



April 7, 2026

**Re: Evaluation of Potential Revocation of Chaco Withdrawal
NEPA No. DOI-BLM-NM-F010-2026-0002-EA**

The National Trust for Historic Preservation¹ is strongly opposed to the proposal by the Bureau of Land Management (“BLM”) to revoke Public Land Order (“PLO”) No. 7923² and the 10-mile protective buffer it established surrounding Chaco Culture National Historical Park. The 10-mile protective buffer is necessary to protect Chaco Culture National Historical Park’s landscape, which is an internationally significant tribal cultural property and UNESCO World Heritage Site. There are also numerous individually significant archaeological sites within the 10-mile buffer zone that are protected by the National Historic Preservation Act (“NHPA”). Chaco Canyon and the surrounding landscape hold remarkable examples of ceremonial buildings, distinctive great houses, and an elaborate network of engineered roads that link Chaco Canyon with outlying sites. This landscape was designated a World Heritage Site in 1987 for preserving outstanding elements of Chacoan culture, which dominated the region from the mid-9th to early 13th centuries. and the area cannot be opened for mineral, oil, and gas extraction without significant adverse effects to historic, religious, and cultural resources.

The development and enactment of the Chaco Cultural Heritage Area Protection Act of 2019 (H.R. 2181), and the subsequent issuance of PLO No. 7923, resulted from years of public engagement and advocacy. BLM’s current proposal to revoke the PLO—after only a 7-day comment period over a holiday weekend, and no tribal consultation—is grossly inadequate, and stands in stark contrast to the thoughtful and deliberate process that led to its creation. We urge BLM to pause, slow down, and engage in a process of public dialogue, tribal consultation, and additional study prior to taking any action.

Beyond the significant threat to Chaco Canyon’s cultural and historic resources, there is no legitimate need that justifies opening these lands to drilling. In fact, in July, BLM scaled

¹ The National Trust for Historic Preservation in the United States is a private nonprofit organization chartered by Congress in 1949 to “facilitate public participation” in the preservation of our nation’s heritage, and to further the historic preservation policy of the United States. *See* 54 U.S.C. § 312102(a). With more than 750,000 members and supporters around the country, the National Trust works to protect significant historic sites and to advocate for historic preservation as a fundamental value in programs and policies at all levels of government. In addition, the National Trust has been designated by Congress as a member of the federal Advisory Council on Historic Preservation, which is responsible for working with federal agencies to implement compliance with Section 106 of the National Historic Preservation Act. *Id.* §§ 304101(a)(9), 304108(a).

² 88 Fed. Reg. 37,266 (June 7, 2023).

back its forward-looking development projections for northwestern New Mexico and reaffirmed that the withdrawal area “is not a favorable target[] for future development.”³

If BLM were to proceed with revoking PLO No. 7923, the 10-mile buffer around Chaco Culture National Historical Park would likely become a legal battleground. Any mineral, oil, or gas leases will be subject to review under both the NHPA and National Environmental Policy Act. Given the land’s extreme historic, cultural, and religious significance, there will be substantial opposition to any harmful undertakings by tribes and other state and local stakeholders. BLM should not purposefully create a perpetual legal quagmire by hastily removing existing protections from such an important area, with minimal public notice.

Further, BLM proposes that management of the 10-mile buffer post-revocation would be governed by the 2003 Farmington Resource Management Plan. This 23-year-old plan is stale and cannot serve as a reasonable basis for BLM decision-making in 2026 (much less beyond). BLM must update its resource management plan prior to revoking PLO No. 7923 or likely face additional legal challenges.

For these reasons, the National Trust for Historic Preservation urges BLM to adopt the “No Action Alternative” for the proposed revocation of PLO No. 7923. Please respect the historic, cultural, and religious significance of the Chaco cultural landscape, the need for government-to-government tribal consultation, and the right of the public to reasonably participate in important federal decision-making. In addition, it will be important to understand the unfortunate likely outcomes and legal vulnerability if BLM were to proceed with revocation. Chaco Canyon and its surrounding cultural landscape are irreplaceable and internationally significant and should not be denied the critical protections provided to them by PLO No. 7923.

Sincerely,



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³ See <https://www.blm.gov/sites/default/files/docs/2025-07/rfd-oil-and-gas-blm-nm-ffo-071725.pdf>.