



July 29, 2026

U.S. Department of the Interior
Bureau of Land Management
Farmington Field Office
6251 North College Boulevard, Suite A
Farmington, New Mexico 87402

**Re: Comments on Environmental Assessment for Proposed Revocation of
Public Land Order No. 7923: Public Lands Withdrawal Surrounding
Chaco Culture National Historical Park Boundary, New Mexico
DOI-BLM-NM-F010-2026-0002-EA**

The National Trust for Historic Preservation¹ (“National Trust”) objects to the Environmental Assessment (“EA”) issued by the Bureau of Land Management (“BLM”) for the proposed revocation of Public Land Order (“PLO”) No. 7923² and the 10-mile protective buffer it established surrounding Chaco Culture National Historical Park. The purpose and need for this proposed action is cited as “EO 14241— Immediate Measures to Increase American Mineral Production, EO 14154—Unleashing American Energy, and Secretarial Order (SO) 3418—Unleashing American Energy.”³ These three Orders are based on factual and legal misrepresentations and are currently subject to various legal challenges, which have yet to be fully adjudicated. It is irresponsible of BLM to continue to pursue the proposed revocation given this shifting legal landscape, and the EA is inherently inadequate due both to its false purpose and need, as well as its failure to reasonably evaluate the likely impacts of the proposed revocation.

The Chaco Culture National Historical Park is an internationally significant tribal cultural property, and there are also numerous individually significant archaeological sites within the 10-mile buffer zone surrounding the National Historical Park itself. This landscape was designated as a UNESCO World Heritage Site in 1987 for preserving outstanding elements of Chacoan culture, which dominated the region from the mid-9th to early 13th centuries.

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. 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 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).

³ *Environmental Assessment*, Pg. 2, ¶ 1.2.

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.

PLO No. 7923 was issued just over three years ago, in order to protect a 10-mile buffer surrounding the National Historical Park from mining and oil and gas drilling for a period of 20 years. The 2023 PLO withdrew 338,690 acres of BLM-administered land from mineral leasing and extraction – a protective zone that includes more than 4,200 archaeological and cultural sites outside the boundary of the National Historical Park itself. This 10-mile protective buffer established by the PLO is absolutely necessary for the adequate protection of Chaco Canyon’s cultural resources.

Reopening this 10-mile buffer for mineral, oil, and gas extraction would have significant adverse effects on historic, religious, and cultural resources. Due to these ongoing threats, the Greater Chaco Cultural Landscape has been included twice on the National Trust’s annual list of *America’s 11 Most Endangered Historic Places* – in 2011 and again this year, because of the proposed revocation of the current protections.⁴

We strongly disagree with the proposed finding of No Adverse Effect to Historic Properties, pursuant to 36 C.F.R. § 800.5(c)(2)(i).

Among other things, the EA relies on the applicability of Section 106 to future projects within the 10-mile protective buffer as justification for its finding of No Adverse Effect, and as a bulwark against the severe adverse effects that this revocation will cause.⁵ This rationale is fundamentally flawed in several respects.

First, if future oil and gas drilling or mineral exploration within the 10-mile buffer is “reasonably foreseeable,” then it must be “take[n] into account” “prior to” revoking the current protections. 54 U.S.C. § 306108; 36 C.F.R. § 800.5(a)(1). The normal approach to compliance would be through consultation to develop a programmatic agreement, which would outline a binding process for future evaluation and resolution of adverse effects, under 36 C.F.R. § 800.14(b).

In addition, the Advisory Council on Historic Preservation has proposed a radical evisceration of its regulations, which would essentially eliminate future Section 106 review for these activities.⁶ If these proposed regulations were to become final, the existing protective regulations cited in the EA would not be applicable, placing the internationally-significant historic resources of the Greater Chaco Cultural Landscape at risk.

⁴ See <https://savingplaces.org/places/greater-chaco-landscape>.

⁵ *Environmental Assessment*, Pg. 33.

⁶ For example, “ethnographic landscapes” would no longer be considered historic properties under the proposed new regulations. In addition, future permit applicants for resource extraction projects would not be required to provide notice to tribes, state and local governments, nor the public, much less consider their comments.

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 July, BLM scaled back its forward-looking development projections for northwestern New Mexico and reaffirmed that the withdrawal area "is not a favorable target[] for future development."⁷ The EA's statement of purpose and need does not address this reality, and instead exclusively relies on nationwide Executive Orders that are based on questionable premises. 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.

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 was also the result of years of public engagement and advocacy. In contrast, BLM is currently proceeding with revocation at breakneck speed and appears to be ignoring overwhelming public consensus in opposition to revocation. BLM's procedural approach is both substantively and legally flawed.

For these reasons, the National Trust for Historic Preservation urges BLM to withdraw the EA and 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 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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⁷ See <https://www.blm.gov/sites/default/files/docs/2025-07/rfd-oil-and-gas-blm-nm-ffo-071725.pdf>.