



May 5, 2022

Ms. Sarah Scott
CCNHP Area Withdrawal
Bureau of Land Management Farmington Field Office
6251 College Blvd., Suite A
Farmington, NM 87402

Dear Ms. Scott:

I am writing today on behalf of the Society for American Archaeology (SAA) in response to the "Notice of Proposed Withdrawal and Public Meetings; San Juan County, NM" published in the Federal Register (Vol. 87, No. 4, pp. 785-789) on January 6, 2022. We wish to express strong support for the proposed withdrawal of approximately 351,000 acres of public lands in northwestern New Mexico from mineral entry and leasing.

The SAA is an international organization that, since its founding in 1934, has been dedicated to research about and interpretation and protection of the archaeological heritage of the Americas. With more than 5,500 members, the SAA represents professional and avocational archaeologists, archaeology students in colleges and universities, and archaeologists working at tribal agencies, museums, government agencies, and the private sector. The SAA has members throughout the United States, as well as in many nations around the world.

The cultural landscape surrounding Chaco Culture National Historic Park is one of the most important in North America, not only because of archaeological remains, but also because of its continuing importance to many Native American communities who still use and occupy these lands, and who view Chaco Culture National Historic Park and the surrounding archaeological manifestation as their heritage. With that heritage comes a strong sense of stewardship and responsibility to the ancestors who produced that heritage. The mineral withdrawal is an essential step in the protection of these values, and to reaffirm the federal government's trust responsibility to Native Americans.

The significance and importance of the 10-mile zone revolves around its values—spiritual, psychological, emotional, archaeological, and scientific. Chaco Canyon and the surrounding Greater Chaco Landscape constitute a living cultural and ancestral landscape of great significance to the 19 Pueblo Tribes of New Mexico, the Navajo Nation, Ysleta del Sur Pueblo, and the Hopi Tribe. The Pueblos view archaeological sites across the Greater Chaco Landscape as an important part of their history, and continue to maintain ties to these archaeological sites and other traditional cultural places across this rich landscape. Pueblo ancestors lived and

practiced rituals within the boundaries of CCNHP and across the Greater Chaco Landscape for thousands of years. Navajo residents of Greater Chaco have enduring ties to this landscape, as well, and the Navajo Nation identifies many traditional cultural places in the region.

Beyond providing a protective buffer for Chaco Canyon, the 10-mile zone requires protection in its own right. More than 4,200 archaeological and historic sites, and sacred sites lie within its boundary. These places were created by diverse cultural groups—including Paleoindian, Archaic, Pueblo, Navajo, Jicarilla Apache, and others—in time periods from about 10,000 BCE to the present. Because only 15 percent of the area enclosed by the 10-mile zone has been culturally surveyed, the actual cultural resource count is undoubtedly much higher.

We note that the proposed withdrawal does not apply to minerals owned by Native American allottees, and that other uses, including lawful ingress and egress for the purpose of developing mineral leases on the allotted lands, would not be affected. This is a highly complex and contentious issue, one that can only be properly addressed by comprehensive, government-to-government consultation between the BLM and the impacted tribal nations. We urge the BLM to make that consultation a top priority in moving forward. In addition, a Bureau-convened working group of tribal representatives and archaeologists could be productive in developing solutions.

The Chacoan cultural landscape and these special, sacred places deserve the protection that will come from the Federal land withdrawal.

Sincerely,



Deborah L. Nichols, PhD, RPA
President