



January 25, 2021

Mr. Alex De La Garza
Acting Secretary
Department of Interior
1849 C Street, N.W.
Washington DC 20240

Dear Acting Secretary De La Garza,

I am writing today on behalf of the Society for American Archaeology (SAA) **to applaud Secretarial Order 3395, and also** to urge immediate Department of Interior attention to a Federal land use plan intended to facilitate oil and gas development within the Greater Chaco Region of northwestern New Mexico. The matter is urgent because this document will be finalized by April, 2021, and the final Record of Decision is scheduled for June, 2021. Decisions made through this process will govern oil and gas development on Federal, Tribal, and allotted lands for decades to come.

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 nearly 7,000 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 *Farmington Mancos-Gallup Resource Management Plan Amendment and Environmental Impact Statement* is being prepared jointly by the Bureau of Land Management (BLM) and the Bureau of Indian Affairs (BIA). The planning area includes one of the most important archaeological landscapes in North America and likely the Western hemisphere, and it is of tremendous cultural and spiritual significance to multiple Native American Tribes and Pueblos. The plan now being considered was developed under a framework that prioritizes mineral extraction development over other concerns, including historic preservation, humanistic sentiments and traditional Native American uses and values. Without timely involvement by the Department of the Interior, the Federal agencies are all but certain to adopt the development-oriented preferred alternative.

In December, 2019 Congress appropriated funds for a study intended to document traditional Native American uses and values with specific reference to this issue, but results of this critical study are not yet available. Nevertheless, the BLM and BIA maintain that under Secretarial Order 3355, the plan and EIS schedule is fixed, and that they lack the authority to further delay completion of the process.

We note that Secretarial Order 3395 effectively suspends land use planning decisions and many oil and gas related activities for a 60 day period, and we urge the in-coming administration to direct particular attention to the *Farmington Mancos-Gallup Resource Management Plan Amendment and Environmental Impact Statement*. This particular land use planning process should be suspended until the COVID-19 Public Health Emergency has ended, more meaningful tribal consultation that was truncated by the pandemic is obtained, and until proper baseline cultural resources studies, including the tribally-led cultural resources initiatives, have been completed. In the meantime, no new leases should be issued throughout the planning area and affirmative steps should be taken to address concerns from Native American Tribes and Pueblos regarding ongoing and proposed new oil and gas development. Finally, we recommend that these measures be coordinated within the Secretary's office by a person familiar with northwestern New Mexico and the concerned tribal communities.

Sincerely,

A handwritten signature in black ink that reads "Joe E. Watkins". The signature is fluid and cursive, with "Joe E." on top and "Watkins" below it.

Joe E. Watkins, Ph.D., RPA
President