

Protect the Greater Chaco Landscape

U.S. Department of the Interior and Bureau of Land Management threatens to revoke the 10-mile buffer zone surrounding the Chaco Culture National Historical Park

Pueblo Community Commenting Toolkit

May 2026

SUMMARY - WHAT IS HAPPENING NOW

The Bureau of Land Management (BLM) is issuing a Draft Environmental Assessment (EA) that considers revoking or narrowing the protections of Public Land Order No. 7923 (PLO 7923), which protects the public lands within roughly 10 miles equating to a 351,479.97 acre radius surrounding the Chaco Culture National Historical Park.

What the All Pueblo Council of Governors (APCG) is asking Pueblo communities to do: Submit a public comment to BLM during the public comment period, urging the selection of the No Action Alternative — keeping Public Land Order No. 7923 in place, in full.

How long you have: The public comment period is expected to be 14 days. Comments must be submitted before the final deadline via the BLM NEPA Register Portal. We will announce when that period is open and the deadline when available.

Template Comment Options: Three template options accompany this toolkit and are described below to assist you. **First**, consider writing a robust comment using the template linked below to address several areas the Draft EA will analyze. **Second**, if you are short on time, consider writing a shorter public comment. **Third**, if you want to draft your own public comment, in the template linked below, there are prompts and questions for your consideration as you're drafting your own personalized public comment.

Download copies of these templates at: <https://apcg.org/chaco/> or scan:



How to Submit: Public comments have to be submitted directly online:

<https://eplanning.blm.gov/Project-Home/?id=D949F582-402D-F111-8341-001DD804183B> or through the following QR CODE. Your Pueblo may provide you

additional instructions on collecting comments (e.g. dropping off at Governor's Office or during community forums). **IMPORTANT: DO NOT SUBMIT YOUR COMMENT UNTIL**

THE 14-DAY COMMENT PERIOD IS OPEN. QR CODE for Submission:



At the top of the page, when the period is open, there will be a button titled "Participate Now," and once you click, it will take you to the portal to submit a scoping comment/letter. You are able to either write a comment in the portal or upload a document.

Look out for future Pueblo community workshops: Several Pueblos will be hosting in-person community workshops to help community members with drafting their public comments. This toolkit will be updated when future workshops are announced.

BACKGROUND

In 2023, former Department of the Interior (DOI) Secretary Deb Haaland announced [Public Land Order No. 7923 \(PLO 7923\)](#), withdrawing federal public lands within approximately 10 miles surrounding the Chaco Culture National Historical Park (CCNHP) from future oil and gas leasing and development and mineral extraction for a period of 20 years. Shortly after, the NM State Land Commissioner issued an executive order extending a moratorium on new oil, gas, and mineral leasing on state trust land in the buffer zone for a period of 20 years.

Together, these 20 year moratoriums were hard-won federal and state protections produced after years of tribal, state, and federal advocacy and analysis. While not permanent, they presented a step towards permanent and landscape-level protections the Greater Chaco landscape deserves.

Previously, in November 2021, Secretary Haaland initiated the [“Honoring Chaco Initiative \(HCI\)”](#)— a collaborative effort between the Bureau of Land Management (BLM) and Bureau of Indian Affairs (BIA) to create new opportunities for landscape-level management plans for the Greater Chaco Landscape which involved tribal leadership and departments, Indigenous NGOs, and local community members. While Phase I was completed with a [Final Assessment](#) published on November 23, 2022, yet the HCI process was never fully completed.

Years of widespread efforts to protect sacred sites, cultural resources, and public health across the Greater Chaco landscape have persisted, yet oil and gas drilling permitting continues despite the implementation of PLO No. 7923. Impacts have accumulated due to over 91% of the public lands in the BLM’s Farmington Field Office, which includes areas of the Greater Chaco landscape, having already been leased for oil and gas development.

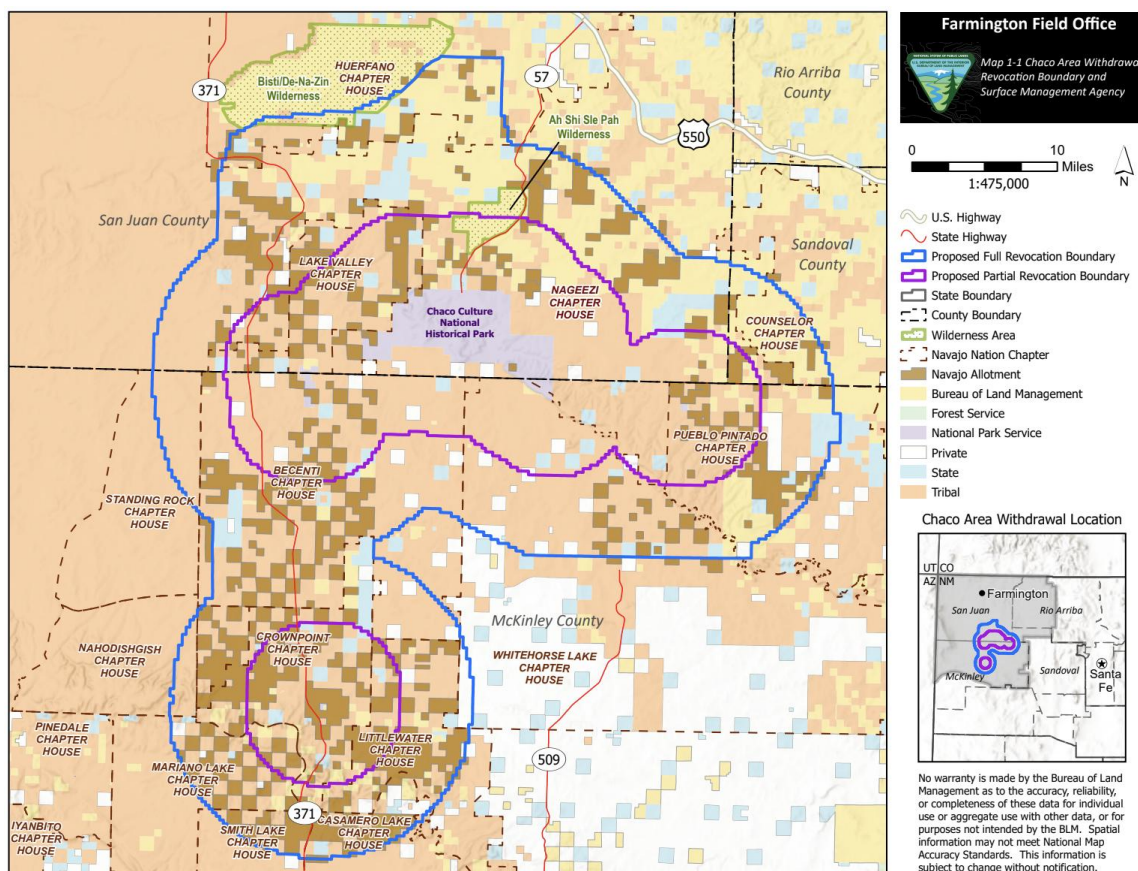
In May of 2025, DOI and BLM initiated the process to revoke PLO No. 7923. Prior to the new administration, the revocation of the 10-mile buffer was already targeted as a policy objective in *Mandate for Leadership: The Conservative Promise* (commonly known as [Project 2025](#)), a published policy blueprint released in 2023, before the current administration took office.

Almost a year later, on March 31, 2026, the BLM publicly announced the beginning of their environmental review for the potential revocation of the 10-mile buffer surrounding Chaco Culture National Historical Park (CCNHP). The BLM only allowed a 7-day timeline for tribes and stakeholders to submit scoping comments that were due on April 7th, 2026. This process involves the BLM collecting scoping

comments/letters to prepare a draft Environmental Assessment (EA) which will inform their decision on the alternatives listed below. According to the National Environmental Protection Act (NEPA) process, once the draft EA is published, there will be a public comment period; another opportunity for stakeholder engagement. The BLM is considering the following 3 alternatives in their draft EA:

1. **No Action Alternative:** 10-mile buffer withdrawal remains in effect.
2. **Alternative 1 (BLM Proposed Action):** Revoke the full 10-mile buffer withdrawal.
3. **Alternative 2:** Rescind the buffer to 5-mile withdrawal to allow leasing and mining.

The All Pueblo Council of Governors supports the No Action Alternative, opposing Alternatives 1 and 2. Either alternative would expose a living cultural landscape to harms that cannot be undone, and would reverse the result of years of tribal consultation and federal analysis.



Map from the Farmington Field Office outlining the area of land that would be open to resource extraction in the case that the full 10-mile buffer zone is revoked in blue and in the case that there is a partial revocation in purple.

The potential revocation of PLO 7923 would undo the work of countless years of Indigenous, frontline and grassroots organizing efforts. Protecting Chaco Canyon reaffirms our core values as Pueblo people to recenter traditional land management practices and the need to address the historic and contemporary impacts of tribal communities that revere this living landscape as sacred, invaluable and critical to our traditional lifeways. Revoking PLO 7923 perpetuates acts of environmental racism and injustice to the Indigenous and frontline communities that live within the Greater Chaco Landscape. This landscape deserves the continued protections of PLO 7923, meaningful tribal consultation, and protection efforts that go beyond a 10-mile buffer zone.

We are calling on our communities to participate in this public comment period in order to maintain the cultural integrity of the entire Greater Chaco Landscape for generations to come.

WHY YOUR COMMENT MATTERS – WHAT MAKES A COMMENT EFFECTIVE

Public comments are part of the official record the federal government must consider before making its decision. They are also part of the record that protects the public's ability to challenge a federal decision that ignores the substance of public concern. Your comment matters in both ways.

But not all comments carry equal weight in the federal record. A short understanding of how the federal government treats comments helps community members write letters that have the most impact.

Identical form letters can be treated as a single comment. When many people send the exact same letter, the federal government may group them together and respond to them as one. Your comment becomes far more powerful when it includes your own words, your own experiences, and your own observations.

A personal voice carries weight. The federal government is required by law to take a "hard look" at the impacts of its actions. The personal knowledge that Pueblo community members hold about this landscape, its cultural significance, the water and plants and animals that live here, the changes you have seen, what would be lost if these protections are removed; is exactly the kind of information the federal government must consider. It cannot be replaced by any agency study.

You do not need to be a lawyer or a scientist. Words from your own experience are strong. The federal government needs to hear from Pueblo people in Pueblo voices.

Even a short comment counts. If you have ten minutes, share a few specific things you know about this landscape. That is a meaningful comment.

Key Points You May Want to Raise:

The points below align with APCG's overall position. You are encouraged to draw on the points that resonate most with your own experience and put them in your own words.

- I Support the "No Action Alternative". I am in full support of keeping the 10-mile buffer zone that protects Chaco.
- I Oppose Alternatives to reduce the 10-mile buffer, either partially or fully.
- The Greater Chaco Landscape is a living cultural landscape, not a collection of isolated archaeological sites. Pueblo communities maintain ongoing cultural, spiritual, and ancestral relationships with this entire landscape.
- Public Land Order No. 7923 was the product of years of consultation, analysis, and federal recognition. Reversing it on a compressed timeline does not match the seriousness of the decision.
- Resource extraction on and near sacred sites makes it dangerous for my Pueblo and other Indigenous communities to access cultural resources,

conduct ceremonial practices and simply enjoy visiting their ancestral sacred sites.

- The extensive oil and gas drilling and infrastructure located in the Greater Chaco Landscape has continuously polluted surface water, groundwater, air, and soil which current residents rely on.
- Negative impacts to community health have become ever present in children, elders, and the overall community residing, working, or attending school in this area. The [Health Impact Assessment - K'é Bee Hózhoggo Iiná Silá](#) (HIA KBHIS) analysis provides insight to public health impacts to the surrounding Diné communities.
- 91% of the public lands in the Greater Chaco Landscape have been leased out for oil and gas expansion, displaying a blatant over development of oil and gas in the San Juan Basin.
- Oppose alternatives 1 and 2 due to the lack of meaningful tribal consultation and public engagement during the NEPA process.
- Under NEPA, BLM should be conducting a full Environmental Impact Statement (EIS) instead of an Environmental Assessment (EA), since the Department of Interior is considering a colossal decision to revoke the 10-mile buffer.
- The scale of the action, the cultural significance of the landscape, the controversy surrounding the proposal, and the foreseeable impacts on water, air, cultural resources, and tribal communities all support full EIS-level review.
- BLM needs to give more time to tribal governments and other stakeholders to submit comments, because the 7-Day Scoping Period and this current 14-day Comment Period on the Draft EA are not sufficient.
- The 14-day public comment period does not give Pueblo communities, local Diné communities, elders, and people without reliable internet access enough time to participate meaningfully.
- Urge the BLM to hold in-person public comment sessions in directly impacted Pueblo and Navajo communities and extend the public comment period.

Attention!

It is important to personalize your comments to ensure a range and diversity of analyses, opinions, lived experiences, and perspectives that the BLM can include in their synthesis.

NEXT STEPS: CHOOSE AMONG THE THREE TEMPLATE OPTIONS:

Choose the one that fits you best. Any of them are meaningful, and any of them goes into the official record.

Option 1 – The Robust Public Comment. A longer template (four pages) that walks through each of the major issues, with space for you to add your own personal observations throughout. Use this option if you want to engage with the full range of issues at stake and have time to fill it out completely.

Option 2 – The Short Public Comment. A one-page template focused on the most powerful content community members can provide. This includes your personal connection to the Greater Chaco Landscape and what you and your family would lose if these protections were to be removed. Use this option if the longer template feels intimidating, if you have less time, or if you want a shorter letter that still carries real weight.

Option 3 – Question Prompts for Writing Your Own Public Comment. A set of questions designed to help you write your own comment in your own words. Use this option if you prefer *not* to use a template and would rather speak in your own voice. Answering even a few of the questions will produce a strong comment.

All three options are available alongside this toolkit.

Trusted Pueblo Partner Organizations:

The following organizations are assisting in this effort. Their social media pages may be a resource for you to access additional information and updates regarding this effort. In addition to your Governor's Office, feel free to

Organization	Contacts	Facebook	Instagram
Pueblo Action Alliance	Primary Contact: Julia Bernal, Executive Director, julia@puebloactionalliance.org Alicia Gallegos, Climate Justice Organizer, alicia@puebloactionalliance.org	Pueblo Action Alliance	@PuebloActionAlliance
Sovereign Energy	Primary Contact: Marissa Naranjo, Deputy Director, marissa@sovereignenergy.org	Sovereign Energy	@Sov_Energy
NAEVA	Primary Contact: Kaitlin Victorino, Indigenous Policy Coordinator, kaitlin@naeva.org Ahtza Chavez, Executive Director, ahtza@naeva.org	NM Native Vote	@NativeVoters
Native Lands Institute	Primary Contact: Keegan King, CEO/President keegan@native-lands.org	Native Land Institute	@NativeLandInstitute
High Water Mark LLC	Primary Contact: Teran Villa teranvilla@high-watermark.com		

contact them if you have any questions.

Please contact these organizations if you have any questions or need assistance filling out your comment letter.

Recommended hashtags for community use:

#FrackoffChaco #ProtectGreaterChaco #ProtecttheSacred #HonorChaco.
#LandBack #WaterBack #WaterProtectors #LandProtectors #DinePuebloSolidarity
#StolenLandsAncestralLand

Resources:

**The Resources Listed below can also be accessed through a digital folder,
just scan the QR Code below!**



[APCG Chaco Webpage](#) – Contains APCG Resolutions, Fact Sheets, and information concerning APCG’s advocacy to protect Chaco Canyon.

[Chaco Zine](#)

[FPIC Zine](#)

[UCLA White Paper](#)

[Frack Off Chaco Press Release](#) (January 6, 2022)

[Greater Chaco Coalition platform and primer](#) – Frack off Greater Chaco Coalition Letter Regarding the Honoring Chaco Initiative to BLM Former Deputy Director of Policy and Programs Nada Culver (April 19, 2023)

[“Our Story: The Indigenous Led Fight to Protect Greater Chaco”](#) – Film is also available on Amazon Prime and Kanopy.

[“Protecting Greater Chaco”](#) – Film from Archaeology Southwest featuring Pueblo leaders and local Dine advocates speaking about the importance of protecting Chaco.

[NM Delegate Letter to Sec. Burgum](#) (June 6, 2025)

[CRR Youth Fellows Op-Ed](#)



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