

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

June 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 opens and the deadline, when available.

Template Options: Comment 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, the template linked below includes prompts and questions to guide your 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-F111-8341-001DD804183>

[B](#) or through the following QR CODE. Your Pueblo may provide you additional instructions on collecting comments (e.g., dropping off at your Governor's Office or during community forums).

IMPORTANT: DO NOT SUBMIT YOUR COMMENT UNTIL THE 14-DAY COMMENT PERIOD IS OPEN.

14-DAY COMMENT PERIOD NOW OPEN AS OF WEDNESDAY JULY 15, 2026.

QR CODE for Submission:



SUBMISSION DEADLINE IS WEDNESDAY JULY 29, 2026 AT MIDNIGHT MDT

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.

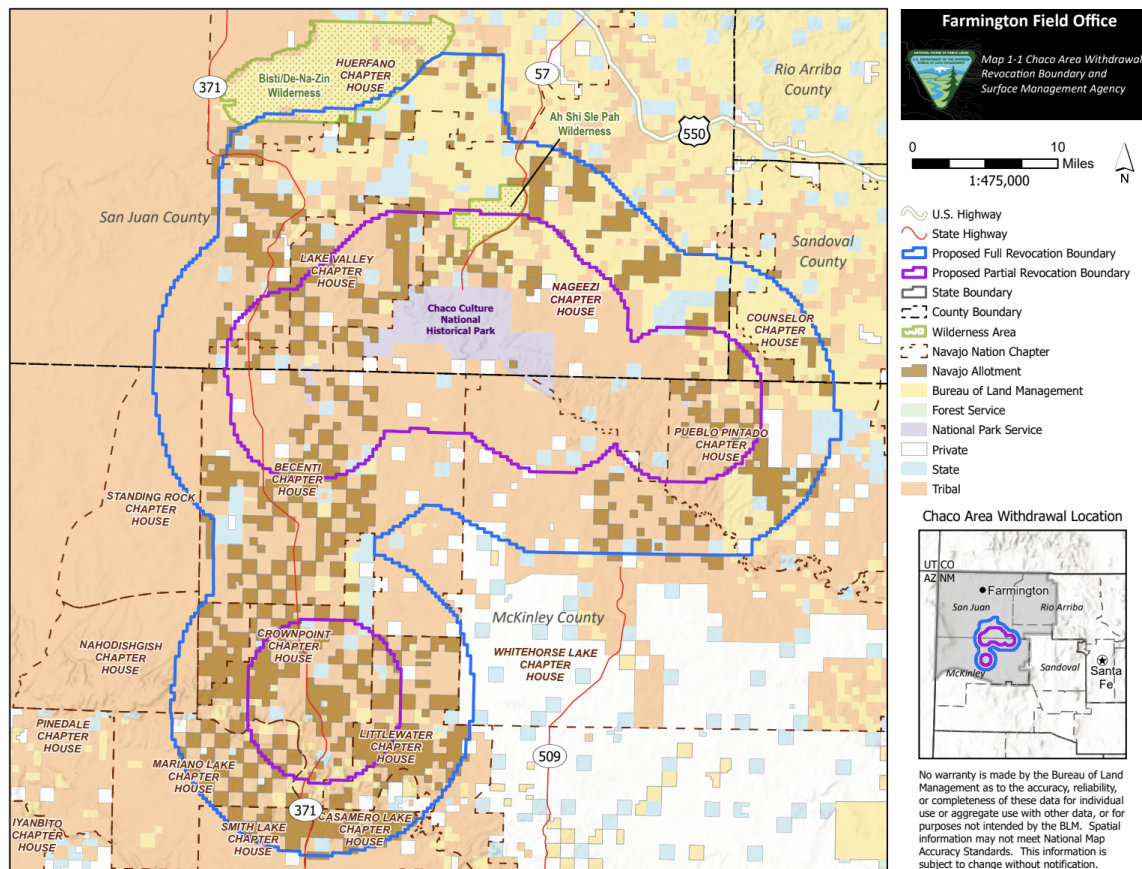
Years of widespread efforts to protect sacred sites, cultural resources, and public health across the Greater Chaco landscape have persisted, yet oil and gas drilling permitting continues despite the implementation of PLO No. 7923. Impacts have accumulated due to over 91% of the public lands in the BLM’s 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 Hózhqogo liná 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:



<https://bit.ly/CHACOSAMPLES>

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. Public Comment Templates are also attached at the end of 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 contact them if you have any questions.

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		

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

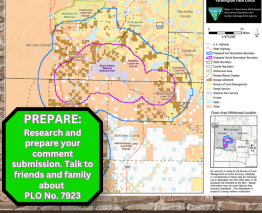
Social media graphics below, are linked in the folder below.

Social Media Graphics

Protect the Greater Chaco Landscape
US Department of the Interior and Bureau of Land Management threatens to revoke the 10-mile buffer surrounding Chaco Culture National Historical Park

The BLM is issuing a Draft Environmental Assessment (EA) that considers revoking or narrowing the protections of Public Land Order No. 7923 (PLO 7923) otherwise known as the 10-mile buffer.

The All Pueblo Council of Governors (APCG) is asking Pueblo community members to submit public comments that urge the BLM to select the No Action Alternative during the public comment period—to keep Public Land Order No. 7923 in place, in full.



PREPARE: Research and prepare your comment submission. Talk to friends and family about PLO No. 7923.

For the Full Commenting Toolkit
Scan the QR Code or visit <https://bit.ly/26CHACOKIT>



IMPORTANT: DO NOT SUBMIT YOUR COMMENT UNTIL THE 14-DAY COMMENT PERIOD IS OPEN. WE WILL ANNOUNCE WHEN COMMENT PERIOD IS OPEN.

Protect the Greater Chaco Landscape
US Department of the Interior and Bureau of Land Management threatens to revoke the 10-mile buffer surrounding Chaco Culture National Historical Park

THREE TEMPLATE COMMENT OPTIONS:

- Consider writing a **robust comment** using the template linked below to address several areas the Draft EA will analyze.
- If you are short on time, consider writing a **shorter public comment**.
- If you want to **draft your own public comment**, in the template linked below, there are questions to help guide your writing for a personalized public comment.

DOWNLOADABLE COPIES OF THESE TEMPLATES CAN BE FOUND AT:
<https://bit.ly/26CHACOSAMPLES>
Or
Scanning the QR Code



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.

Protect the Greater Chaco Landscape
US Department of the Interior and Bureau of Land Management threatens to revoke the 10-mile buffer surrounding Chaco Culture National Historical Park

BACKGROUND

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. Before the current administration took office, 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.



To read more background information visit the toolkit. [Linked in QR Code](#)

Protect the Greater Chaco Landscape
US Department of the Interior and Bureau of Land Management threatens to revoke the 10-mile buffer surrounding Chaco Culture National Historical Park

MORE RECENTLY

On April 7, 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 (CONHP). The BLM only provided 7-days for tribes and all stakeholders to submit scoping letters.

According to the National Environmental Protection Act (NEPA) process, scoping letters will be synthesized and included in the draft EA. Once the draft EA is published, a 14-day public comment period will begin; another opportunity for stakeholder engagement.

The BLM is considering the following 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. Both alternatives would expose a living cultural landscape to harms that cannot be undone, and would reverse years of tribal consultation and federal analysis.

To read more background information visit the toolkit.

Protect the Greater Chaco Landscape
US Department of the Interior and Bureau of Land Management threatens to revoke the 10-mile buffer surrounding Chaco Culture National Historical Park

WHAT MAKES AN EFFECTIVE PUBLIC COMMENT

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.

Not all public comments carry equal weight in the federal record. **Identical comments can be treated as a single comment.** Your public comment becomes far more powerful when it includes your own words, experiences, and observations.

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

WHY YOUR COMMENT MATTERS

Your voice carries weight. 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. This insight cannot be replaced by any agency study.

THE FEDERAL GOVERNMENT NEEDS TO HEAR FROM PUEBLO VOICES.

Protect the Greater Chaco Landscape
US Department of the Interior and Bureau of Land Management threatens to revoke the 10-mile buffer surrounding Chaco Culture National Historical Park

KEY POINTS YOU MAY WANT TO RAISE:

The points below align with APCG's overall position. You are encouraged to use 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 that protects Chaco.
- I **Oppose** Alternatives 1 and 2 that 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 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.

FOR MORE KEY POINTS VISIT THE TOOLKIT.

Protect the Greater Chaco Landscape
US Department of the Interior and Bureau of Land Management threatens to revoke the 10-mile buffer surrounding Chaco Culture National Historical Park

WE ARE CALLING ON OUR PUEBLO COMMUNITIES TO PARTICIPATE IN THIS UPCOMING PUBLIC COMMENT PERIOD TO HELP MAINTAIN THE CULTURAL INTEGRITY OF THE ENTIRE GREATER CHACO LANDSCAPE FOR GENERATIONS TO COME.

In-person workshops to help our Pueblo community members write personalized public comments will be announced soon!

Protect the Greater Chaco Landscape
US Department of the Interior and Bureau of Land Management threatens to revoke the 10-mile buffer surrounding Chaco Culture National Historical Park

Comment Template Options:
Download copies of templates at <https://bit.ly/26CHACOSAMPLES> or scan the QR Code

For full Chaco commenting toolkit visit
<https://bit.ly/26CHACOKIT> or scan the QR Code

Further resources can also be accessed through a digital folder, just scan the QR Code!

Where to Submit Public comments:
<https://planning.blm.gov/Project/Home/?id=D949E582-402D-E111-8341-0001D804183B> or scan the QR Code

IMPORTANT: DO NOT SUBMIT YOUR COMMENT UNTIL THE 14-DAY COMMENT PERIOD IS OPEN.

Recommended hashtags for community use:

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

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)

[PAA Cultivating Roots & Resistance Youth Fellows Op-Ed](#)



**SOVEREIGN
ENERGY**



PUBLIC COMMENT TEMPLATE OPTION 1:

Field Manager
Bureau of Land Management Farmington Field Office
6251 College Boulevard, Suite A
Farmington, New Mexico 87402

**Re: Public Comment on Draft Environmental Assessment — Proposed Reconsideration of
Public Land Order No. 7923, Greater Chaco Landscape**

SECTION 1. WHO I AM AND MY CONNECTION TO THIS LAND

My name is _____ [YOUR FULL PRINTED NAME]. I am a member of
the Pueblo of _____ [YOUR PUEBLO(s)]. I am submitting these
comments as a member of a Pueblo community with deep ancestral, cultural, and continuing ties to the
Greater Chaco Landscape.

My personal connection to this landscape is this:

*[Describe in your own words your connection to Chaco and the surrounding land. You may include any of
the following that are true for you: my ancestors came from this region / my family has traveled to these
places for generations / I was taught about this land by my elders / I visit these places as part of my
cultural and spiritual practice / my clan, society, or religious responsibilities connect me to this landscape
/ I gather plants, medicines, or other resources in this region / the stories I was raised with speak of this
land].*

I am asking the Bureau of Land Management to take my comments seriously and to include them fully in
the administrative record for this decision.

SECTION 2. THE GREATER CHACO LANDSCAPE IS A LIVING CULTURAL LANDSCAPE

Chaco Canyon and the lands around it are not just an archaeological site. They are a living,
interconnected cultural landscape. My ancestors built this place, traveled through it, farmed it, and
maintained relationships with it that continue in my community today. The landscape itself — the mesas,
the washes, the springs, the shrines, the roads, the places where plants and animals live — is part of
who we are.

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and extend across the width of the page. There are no margins, text, or other markings on the paper.

Public Land Order No. 7923 was put in place because the federal government recognized — after many years of consultation with our Pueblos, other Tribes, and the public — that this landscape deserved protection as a whole, not just as scattered sites. That recognition remains correct today. Nothing has changed about why this land is sacred. What may be changing is only the willingness of the federal government to keep its commitments.

I am concerned that the Draft Environmental Assessment does not fully consider the environmental and cultural impacts that would result from changing or removing the protections of Public Land Order No. 7923. The federal government has a legal duty to take a "hard look" at these impacts. Based on my own knowledge and experience of this landscape, I do not believe the Draft Environmental Assessment has done so.

Water:

[Describe what you know or have observed about water in this region — for example, springs or seeps your family has known, washes or drainages you have seen change over time, water sources you or your community rely on or have relied on, concerns about pollution or depletion of water in this area]

Plants, foods, and medicines:

[Describe any plants, foods, or medicines that you, your family, or your community gather or have gathered in this region — for example, specific plants used in ceremony, medicinal plants, traditional foods, or any changes in where or how those plants can be found]

Wildlife:

[Describe any animals, birds, or other wildlife you have observed in this area, especially those with cultural, subsistence, or spiritual significance to your community — for example, deer, elk, eagles, hawks, or others]

Cultural and sacred places:

[You do not need to name or locate specific sacred places. You may say generally: there are places in this landscape that have deep spiritual significance to my community / my community knows of places in this area that are not on any federal map / the landscape itself is sacred, not just the places already listed in federal records]

Air, health, and community impacts:

[Describe any concerns about truck traffic, noise, air pollution, dust, night skies, odors, or other impacts on communities near the Chaco region, or concerns about the health of people who live near existing oil and gas development]

Impacts on my family, community, and future generations:

_____ *[Describe what would be lost for you, your children, or your grandchildren if this area is opened to new oil, gas, or mineral development]*

The Draft Environmental Assessment cannot be considered adequate if it does not take account of knowledge like this. I ask that the Bureau of Land Management include these observations in the record and genuinely consider them.

SECTION 4. THE CUMULATIVE IMPACTS ON THIS LANDSCAPE HAVE NOT BEEN HONESTLY CONSIDERED

The Greater Chaco region has already experienced decades of oil and gas development. The wells, roads, compressor stations, pipelines, and heavy traffic that have been added to this landscape over the years are already causing harm. The question now is not whether a single new well will have an impact. The question is what this landscape will look like after the protections are removed and this development continues and expands.

What I have seen change in this region over time:

_____ *[Describe in your own words any changes you have noticed. Examples you may use if they are true for you: when I was younger the night sky in this area was much darker / I can no longer find plants in places where my family used to gather them / the roads are busier and the traffic is heavier than I remember / the air has a different smell or quality than it used to / I have heard elders describe how this land has changed during their lifetimes / I have seen springs or water sources that are weaker or gone].*

Any environmental review must honestly consider the combined effect of past, present, and reasonably expected future development on this landscape. I do not believe the Draft Environmental Assessment does this. A serious analysis would show that this landscape has already absorbed more than its share of harm.

SECTION 5. THIS ACTION IS SIGNIFICANT ENOUGH TO REQUIRE A FULL ENVIRONMENTAL IMPACT STATEMENT

The proposed action would remove or weaken federal protection for a landscape of more than 336,000 acres surrounding Chaco Culture National Historical Park. That protection was put in place for a twenty-year period, based on years of study, tribal consultation, and federal analysis. An action that reverses that kind of decision is not a minor administrative step. It is a significant federal action.

For this reason, I believe the Bureau of Land Management is legally required to prepare a full Environmental Impact Statement, not only an Environmental Assessment. The impacts of this action on water, air, wildlife, cultural landscapes, tribal sovereignty, public health, and future generations are direct, indirect, cumulative, and long-lasting. They involve a landscape of unique cultural and historical value. They are highly controversial, as the volume and nature of public comment and tribal opposition will show. They set a precedent for how the federal government treats other sacred landscapes. Each of

these factors, on its own, supports the need for an Environmental Impact Statement. Together, they make the need clear.

Why I believe this action deserves the most serious level of review:

[Add your own reasons in a sentence or two. You may say any of the following that fit your view: this landscape is too important to be treated as a routine land-use decision / the damage from oil and gas development near Chaco cannot be undone once it happens / my community has already seen what this kind of development does to land, water, and health / the federal government took years to decide this landscape should be protected and should take that protection just as seriously now].

SECTION 6. THE PUBLIC COMMENT PROCESS HAS NOT GIVEN THE PUBLIC FAIR TIME TO RESPOND

The time the public has been given to review and comment on this Draft Environmental Assessment is too short. A [insert actual length once announced] comment period is not enough time for ordinary people — especially members of tribal communities, elders, and people without reliable internet access — to read the agency's analysis, gather their thoughts, and respond in a meaningful way.

The protection of this landscape under Public Land Order No. 7923 was the result of years of federal work and tribal consultation. It is not reasonable to expect the public to respond to a possible reversal of that protection in a matter of days.

My personal experience with this comment process:

[Add your own words, if you wish. You may describe any of the following if they are true for you: I do not have reliable internet access at home / I learned about the comment period very late / I had to travel or ask someone for help to submit this comment / English is not my first language / the Draft Environmental Assessment is long and difficult to review on short notice / I would have liked more time to speak with elders, leaders, or others in my community before commenting].

I ask the Bureau of Land Management to extend the public comment period and to ensure that communities most affected by this decision have a real chance to participate.

SECTION 8. I SUPPORT THE NO ACTION ALTERNATIVE — PRESERVE PUBLIC LAND ORDER NO. 7923

I urge the Bureau of Land Management to select the No Action Alternative. Public Land Order No. 7923 should be kept in place, in full, without narrowing and without revocation.

Public Land Order No. 7923 protects a living cultural landscape that cannot be replaced. It is the product of years of work, consultation, and careful federal decision-making. The reasons for the protection have

not gone away. The cultural, spiritual, environmental, and community values at stake are just as important today as they were when the withdrawal was put in place.

I oppose any alternative that would revoke, narrow, shrink, or weaken the protections of Public Land Order No. 7923. Once this landscape is damaged by new oil, gas, or mineral development, that damage cannot be undone. The risk is too great and the harm would fall on communities, waters, cultural places, and future generations that deserve better.

Why I support keeping these protections in place:

_____ *[Add your own words. You may say any of the following that fit your view: I want my children and grandchildren to be able to visit this land and know it as I have known it / my community has fought for this protection for many years and it must be maintained / this land holds the stories of my ancestors and cannot be replaced / my elders taught me that we are responsible for this place and that responsibility does not end].*

SECTION 9. CLOSING

I am submitting these comments because I believe I have a responsibility — to my ancestors, to my community, and to the generations to come — to speak up for this land. Our teachings tell us that we are caretakers, not owners, of the places that have been passed down to us. That responsibility does not end when a federal agency opens a short comment period. It continues.

[Add a short closing statement in your own voice if you wish. For example: I ask the Bureau of Land Management to honor its obligations to tribal nations and to the people who depend on this landscape / I hope those who read this comment will understand that this is not an abstract land-use question — it is about places that are alive and that matter / I will continue to speak up for the protection of the Greater Chaco Landscape for as long as it takes].

I ask that this comment be included in the full administrative record for this proceeding and that the Bureau of Land Management respond to the concerns raised here.

Respectfully submitted,

Signature: _____

Printed name: _____

Address (optional): _____

Email (optional): _____

PUBLIC COMMENT TEMPLATE OPTION 2:

Field Manager
Bureau of Land Management Farmington Field Office
6251 College Boulevard, Suite A
Farmington, New Mexico 87402

**Re: Public Comment on Draft Environmental Assessment — Proposed Reconsideration of
Public Land Order No. 7923, Greater Chaco Landscape**

My name is _____ (print name). I am a member of
the Pueblo(s) of _____. I write to oppose any action that
would revoke, narrow, or weaken the protections of Public Land Order No. 7923, and to urge the Bureau
of Land Management to select the **No Action Alternative**.

The Greater Chaco Landscape is a living cultural landscape. It is part of who my people are. My
connection to Chaco Canyon and this landscape is this:

What I, my family, and my Pueblo would lose if these protections are taken away or weakened:

*(For example: cultural or sacred significance that cannot be replaced; the ability to pass this landscape to
your children and grandchildren as you have known it; specific places, plants, waters, or animals that
matter to your family; the health of this region; trust that the federal government will keep its
commitments to Pueblo people.)*

The Draft EA does not fully account for what this landscape means to Pueblo communities or for what
would be lost if it is opened to new oil, gas, or mineral development. PLO 7923 was the result of years of
consultation, study, and federal analysis. It should not be undone in a matter of days. The harm from
new development here cannot be undone, and it would fall on communities, waters, cultural places, and
future generations.

I urge BLM to keep Public Land Order No. 7923 in place, in full, and to include this comment in the full
administrative record for this proceeding.

Respectfully submitted,

Signature: _____

Printed name: _____

Address (optional): _____

Email (optional): _____

PUBLIC COMMENT TEMPLATE OPTION 3:

WRITING YOUR OWN COMMENT LETTER A Set of Questions to Help You Get Started

If you choose to write your own comment letter in your own way, the questions below are here to help you think through what to say. You do not need to answer all of them. Pick the ones that matter most to you. Write what is true for you.

A few practical things first:

Address your letter to:

Field Manager, Bureau of Land Management
Farmington Field Office,
6251 College Boulevard, Suite A,
Farmington, New Mexico 87402.

Include the subject line: Public Comment on Draft Environmental Assessment — Reconsideration of Public Land Order No. 7923.

Include your name, your Pueblo affiliation if you wish, and the date. Sign your letter.

How to Submit Your Comments:

1. **On the federal eplanning website, when the comment portal is open:**
<https://eplanning.blm.gov/Project-Home/?id=D949F582-402D-F111-8341-001DD804183B>;
2. **In person:** Your Pueblo Governor's office per your governor's instructions, and partner organizations who may host community commenting sessions during the comment period. Watch for announcements from your Pueblo, APCG or one of the trusted partners described in the Pueblo Public Comment Toolkit.

***IMPORTANT: DO NOT SUBMIT YOUR COMMENT UNTIL THE 14-DAY COMMENT PERIOD IS OPEN.
ANNOUNCEMENTS, FLYERS, AND NOTICES WILL BE CIRCULATED FOR WHEN THE PERIOD IS
OPEN.***

Questions to help you write:

WHO YOU ARE AND YOUR CONNECTION TO THIS LAND

- Who are you, and what is your connection to the Greater Chaco Landscape? Are you a member of a Pueblo community? Do your ancestors come from this region? Has your family traveled to or maintained relationships with this land over generations?
- What did you learn growing up about Chaco and the surrounding landscape? Who taught you about it? What stories, teachings, or traditions of your community speak of this place?

- Have you visited places in this landscape yourself? What was that like? What do you carry with you from those visits?

WHAT THIS LANDSCAPE MEANS

- Why does this landscape matter to you? Try to put it in your own words, even if it is hard.
- What does it mean to you that this is described as a "living cultural landscape" rather than just a set of archaeological sites? Does that match how your community understands this place?
- Are there ways your community still uses, visits, or honors this landscape today?

WHAT YOU KNOW ABOUT THE LAND ITSELF

- What do you know about the water in this region? Springs, washes, seeps, water sources your family has known? Have any of them changed?
- What do you know about the plants, foods, and medicines that come from this region? Are there things your family or community gathers, or used to gather, here? Have those gathering places changed?
- What do you know about the animals, birds, or wildlife in this area, especially those with cultural or subsistence significance to your community? Have they changed?

CHANGES YOU HAVE SEEN OVER TIME

- What do you remember this region looking, feeling, or sounding like when you were younger?
- What has changed? Have you noticed differences in the night sky, the air, the smell of the land, the sounds, the traffic, the plants, the water, the animals?
- Have your elders described changes they have seen during their lifetimes? Has any of that been passed down to you?

CONCERNS ABOUT WHAT MORE DEVELOPMENT WOULD DO

- What worries you about the possibility of new oil, gas, or mineral development in this landscape around Chaco Canyon?
- What do you think would be lost if this protection is removed or narrowed? For you? For your children and grandchildren?
- Are there impacts you are concerned about that you do not think the federal government has fully considered, for example: to water, to air, to community health, to cultural places, to wildlife, to traditional life?

ABOUT THE PROCESS ITSELF

- The protections in Public Land Order No. 7923 took years of work, consultation, and federal analysis to put in place. The federal government is now reconsidering them on a much shorter timeline. Does that match how serious this decision is? Why or why not?
- Did you have enough time to read, think about, and respond to this proposal? Were there barriers that made it harder for you or your community to participate?

- Do you feel that the federal government has listened to Pueblo voices in this process? Why or why not?

WHAT YOU WANT TO HAPPEN

- What do you want the Bureau of Land Management to do?
- Do you support keeping Public Land Order No. 7923 (10-mile buffer) in place?
- What is the most important reason to keep Public Land Order No. 7923, in your own words?

CLOSING YOUR LETTER

- Why are you taking the time to write this comment? What do you want the people reading it to understand?
- What do you want to say to the Bureau of Land Management about your community's responsibility to this land, and the federal government's responsibility too?
- Is there a final message you want to leave them with?