



Native Plant Society of New Mexico

P. O. Box 35388

Albuquerque, NM 87176-5388

April 4, 2022

Re: Mining and Leasing Withdrawal of Lands Surrounding Chaco Culture National Historical Park

Dear BLM:

NPSNM is a non-profit organization with more than 700 members in seven chapters around the state and in El Paso, Texas. Our mission is to educate the public about native plants by promoting knowledge of plant identification, ecology, and uses; foster plant conservation and the preservation of natural habitats; support botanical research; and encourage the appropriate use of native plants to conserve water, land, and wildlife.

The BLM has formally proposed to withdraw from new leasing more than 351,000 acres of public lands surrounding Chaco Culture National Historical Park (CCNHP). In announcing the proposal, President Biden stated that its purpose is to protect the Chaco Canyon and the greater connected landscape, and to ensure that public land management better reflects the sacred sites, stories, and cultural resources in the region. NPSNM supports this proposal.

Chaco culture extends to a network of archaeological sites in northwestern New Mexico which preserves outstanding elements of a vast pre-Columbian cultural complex that dominated much of what is now the southwestern United States from the mid-9th to early 13th centuries. The sites were linked by an elaborate system of carefully engineered and constructed roads, many of which can still be traced.

Native plant communities were part of this cultural landscape. The large timbers for "Great House" construction were transported huge distances from the Chuska and Zuni mountain ranges. The Chacoans grew corn as a staple food, but other local plants were surely relied on for food (e.g. biscuit-root, wild onions), fuel, fiber, medicines and dyes, and supported wildlife that supplied protein to their diet.

Rare plants will also benefit from the minerals withdrawal. The proposed project area does not have much overlap with Important Plant Areas (IPAs) identified in the NM Rare Plant Conservation Strategy, but it is located so as to provide connectivity between the Bisti Oil Field, Nageezi Badlands, Borrego Pass, and Fallen Timber Ridge IPAs. Conserved or improved habitat will benefit rare plant species by allowing for reproductive connectivity and better resilience to climate change.

A 2017 Natural Resource Condition Assessment of CCNHP, administered by the National Park Service, found that the resources of significant concern were vegetation health, from the impacts of ozone, and the acoustic environment, due to reduction in listening area. Weed impacts were unknown, there being no recent data. Oil and gas drilling is known to produce adverse impacts on vegetation through generation of dust, direct habitat removal, weed introduction, and increases in atmospheric ozone concentration and nitrogen deposition.

Thank you for the opportunity to provide public comment on this proposed action.

Rachel Jankowitz, Conservation Chair
Native Plant Society of New Mexico