



Native Plant Society of New Mexico

P. O. Box 35388
Albuquerque, NM 87176-5388

Sarah Scott, Project Manager
Bureau of Land Management
Farmington District Farmington Field Office
6251 College Blvd., Suite A
Farmington, New Mexico 87402

July 16, 2026

Re: Revocation of the Mining and Leasing Withdrawal of Lands Surrounding Chaco Culture National Historical Park (PLO No. 7923)

Dear Ms. Scott:

The Native Plant Society of New Mexico (NPSNM) respectfully submits the following comments in regard to the BLM Farmington Field Office process to revoke PLO No. 7923. The alternatives under consideration include a no-action alternative in which the 10-mile buffer withdrawal remains in place. NPSNM recommends the no-action alternative, with the current 10-mile buffer remaining in effect.

The NPSNM strives to educate the public about native plants by promoting knowledge of plant identification, ecology, and uses; fostering plant conservation and the preservation of natural habitats; supporting botanical research; and encouraging the appropriate use of native plants to conserve water, land, and wildlife. Our members have been active with landscape restoration and conserving federally threatened and endangered plant species in the state of New Mexico, including on BLM lands.

The purpose of PLO No. 7923 is to protect 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. There are numerous reasons for maintaining the current protections under PLO No. 7923.

It is well-known that the Chaco Culture National Historic Park (CCNHP) is a critically important archaeological site that attracts large numbers of visitors, contributes to increased income for the state, and supports jobs in the surrounding communities. The CCNHP is also a World Heritage UNESCO site with “an ancient urban ceremonial center that is unlike anything constructed before or since”. (<https://whc.unesco.org/en/list/353>) The 10-mile buffer zone ensures that activities, such as those proposed by revoking PLO No. 7923, cannot negatively affect the site or its UNESCO status. The Chaco culture can be traced through a network of archaeological sites that preserve outstanding elements of a vast pre-Columbian cultural

complex. 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. biscuitroot, wild onions), fuel, fiber, medicines and dyes, and supported wildlife that supplied protein to their diet. In part because of exclosure from grazing, this site retains a diverse and likely representative vegetative community. PLO No. 7923 expanded this protection and is key to understanding development and growth in plant communities as conditions change. Loss of this protection will represent a loss on many levels.

Rare plants have also benefited from the minerals withdrawal. While the project area has limited overlap with Important Plant Areas (IPAs) identified in the NM Rare Plant Conservation Strategy, it provides connectivity between the Bisti Oil Field, Nageezi Badlands, Borrego Pass, and Fallen Timber Ridge IPAs. Conserved or improved habitat benefits rare plant species by allowing for reproductive connectivity and better resilience to climate change.

A 2021 Natural Resource Condition Assessment of CCNHP, administered by the National Park Service, found significant concern in air quality, specifically ozone for vegetation. Weed impacts also continue to be poorly assessed although invasives such as cheatgrass and tamarisk are present in the CCNHP. Oil and gas drilling are known to produce adverse impacts on vegetation through generation of dust (particulate matter), direct habitat removal, weed introduction, and increases in atmospheric ozone concentration and nitrogen deposition. Any resumption of such activities will have a negative impact on plant communities and plant health.

The extensive support for the withdrawal in 2023, with well over 150,000 letters at that time, still exists. We encourage the BLM to consider the wishes of the general public, the legal status of the tribes, the economic benefits and archaeological value of the site, and the value of the landscape and native plants. We urge the BLM to leave PLO No. 7923 in place as it is currently written.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Sylvan Kaufman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Sylvan Kaufman
Conservation Chair