



# Archaeology Southwest

May 6, 2022

Ms. Sarah Scott  
CCNHP Area Withdrawal  
Bureau of Land Management - Farmington Field Office  
6251 College Blvd., Suite A  
Farmington, NM 87402

Dear Ms. Scott:

This letter represents Archaeology Southwest's organizational comments to the Bureau of Land Management - Farmington Field Office on the proposed Chaco Culture National Historical Park (CCNHP) Area Withdrawal. Thank you for the opportunity to provide input. For more than three decades, Archaeology Southwest has practiced a holistic, conservation-based approach that we call Preservation Archaeology. By conducting low-impact investigations of big-picture questions, sharing our findings with the public, partnering with, consulting, and advocating for Tribes, and developing powerful site-protection strategies, we create meaningful connections to the past and respectfully protect its increasingly endangered resources.

We offer our full support for the Bureau of Land Management (BLM)'s current initiative to withdraw 351,000 acres of Federal surface and subsurface lands in the 10-mile zone around Chaco from oil-gas development for a period of 20 years. We encourage the BLM to act swiftly and ensure protection.

The significance and importance of the 10-mile zone revolves around its values—spiritual, archaeological, and scientific. Chaco Canyon and the surrounding Greater Chaco Landscape constitute a living cultural and ancestral landscape of great spiritual significance to the 19 Pueblo Tribes of New Mexico, the Navajo Nation, Ysleta del Sur Pueblo, and the Hopi Tribe. The Pueblos view archaeological sites across the Greater Chaco Landscape as an important part of their history, and continue to maintain ties to these archaeological sites and other traditional cultural places across this rich landscape. Pueblo ancestors lived and practiced ritual within the boundaries of CCNHP and across the Greater Chaco Landscape for thousands of years. Navajo residents of Greater Chaco have enduring ties to this landscape, as well, and the Navajo Nation identifies many traditional cultural places in the region.

Archaeology Southwest has carried out specific background and field work to evaluate and better understand the resources and values within the 10-mile zone. Here, we discuss four measures of resources and values within the 10-mile zone:

- Site counts—accumulated by many past researchers;
- 10 Chacoan communities;
- Reconnaissance work in the 10-mile zone with a focus on site clusters;
- Ongoing Tribal cultural-ethnographic research.

### **Site Counts in the 10-mile Withdrawal Zone**

A review by Archaeology Southwest in 2020 revealed more than 4,200 archaeological and historic sites in the protective zone (Reed 2020). These places were created by diverse groups—including Paleoindian, Archaic, Pueblo, Navajo, Jicarilla Apache, and others—in time periods from about 10,000 BCE to the present. Because less than 20 percent of the area enclosed by the 10-mile zone has been archaeologically surveyed, the actual site count is undoubtedly much higher.

### **Chacoan Communities in the 10-mile Withdrawal Zone**

Much previous archaeological study has focused on ancient Chacoan-Pueblo communities. At least 10 such communities are known to lie within and just beyond the 10-mile zone around CCNHP, and they are discussed below. The related sites that comprise these communities merit condition assessments, additional study, and protection from oil-gas development.

- The ancient Pueblo community at Bis san’ni comprises at least 30 sites in a roughly 4 km-square or roughly 1000-acre area. The community lies about 5 miles northeast of Pueblo Bonito. The core of the site is a Chaco great house with about 40 rooms and 5 kivas. Pueblo sites in the community around Bis san’ni contain about 50 rooms and several kivas. In addition, the community contains resource procurement sites and other sites of limited use.
- The Pierre’s site complex is the largest community on Chaco’s Great North Road. Pierre’s contains three small Chacoan great houses with perhaps 50 total rooms, single and second-story, and several kivas. The community also incorporates a watchtower-like feature called El Faro (the lighthouse). In the community around Pierre’s core, at least 75 rooms are present at numerous small pueblo habitation or field house sites. Additional sites include artifact scatters, the Great North Road, and rock features. Additional discussion of Pierre’s is provided below.
- A linear community lies along the Ah-Shi-Sle-Pah road and includes more than 45 sites. The road originates at Penasco Blanco and trends to the northwest for more than 25 kilometers (19 miles). Most of this linear ancient community lies within the 10-mile protection zone.
- Tse Lichii’ is a small great house community, located southeast of Chaco’s boundary, It comprises a small great house and several associated small pueblos.
- Mesa Tierra is a Chacoan great house with 30 rooms and 5 kivas located southwest of Pueblo Bonito. The site was built on a mesatop and includes a small community of surrounding sites with perhaps 20 additional rooms.

- Casa del Rio lies along Chaco's West Road and comprises a great house with perhaps 140 rooms and several large, dense midden areas. An ancient reservoir lies south of the great house. The community around Casa del Rio is largely unknown, due to the lack of archaeological survey.
- Greenlee lies southeast of the CCNHP boundary and consists of a Chacoan great house with 15 rooms and one kiva. It sits on a low mesatop. A Chacoan road segment runs to the east of the site. A probable community of small sites surrounds Greenlee but its nature is unclear due to limited archaeological investigation.
- Bee Burrow is a small Chacoan great house with 11 rooms and 2 kivas located south of Pueblo Bonito and the CCNHP boundary. Chaco's South Road passes by the site to the east. Petroglyphs are present along a cliff face southwest of the great house. The community surrounding Bee Burrow is poorly understood but contains dozens of small pueblo sites and perhaps 500 total rooms.
- The Indian Creek community lies west of Chaco and includes two small Chacoan great houses—Casa Cielo and Casa Abajo—and a community of 20 small pueblo sites with over 100 rooms. In addition to the communities listed above, there are others—clusters of sites that may constitute distinct communities and have not yet received detailed examination.

### **Reconnaissance Work in the 10-mile Withdrawal Zone**

To better understand the nature and extent of cultural resources in the 10-mile zone, in 2020, Archaeology Southwest undertook a reconnaissance project focusing on the northwest, north, and northeast portions of the 10-mile area (Reed 2020). A primary goal of the work was to identify or confirm cultural communities in the 10-mile zone, with the main criterion being spatial proximity. In several cases, the mix of sites across time periods was substantial. For these areas, then, the geographically proximate sites were not described as discrete communities, but rather as site clusters.

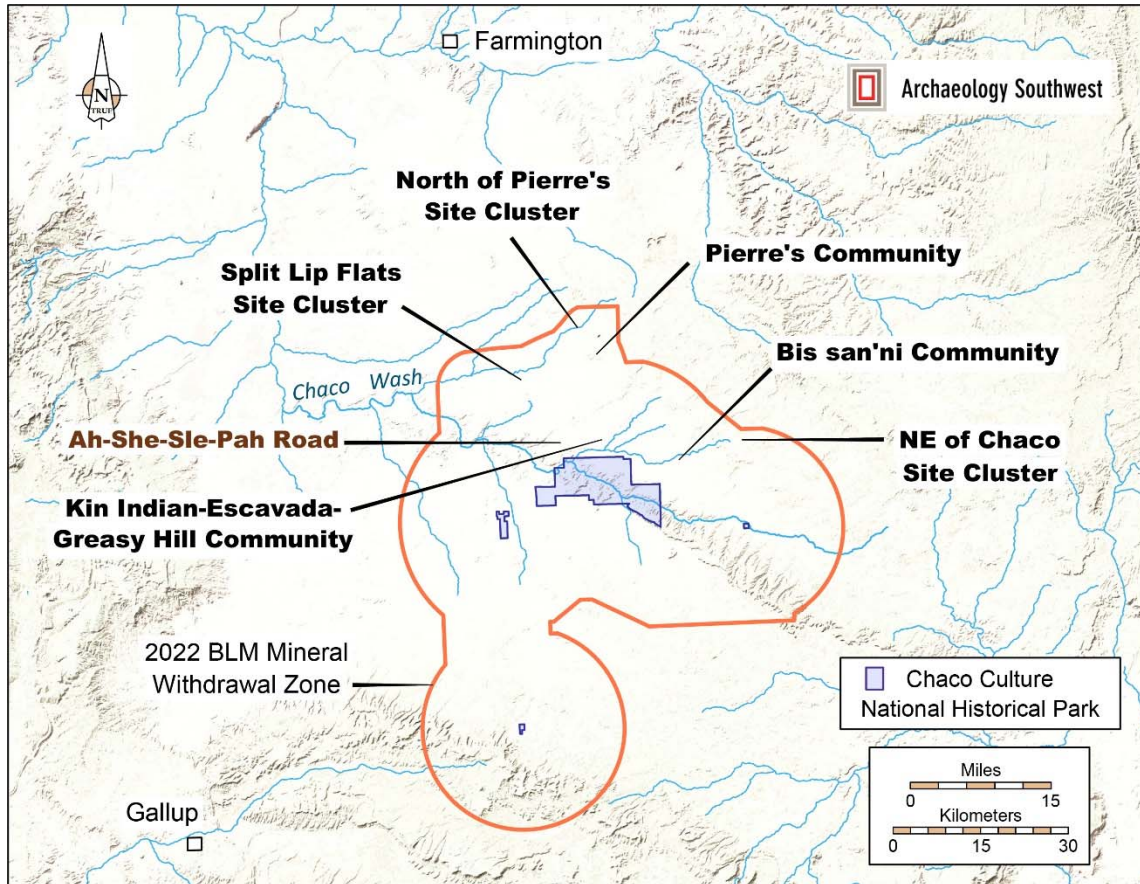
A larger objective in this work was connected to the currently ongoing Resource Management Plan Amendment (RMPA) and Environmental Impact Statement (EIS) planning process undertaken by the BLM and the Bureau of Indian Affairs (BIA). This goal involved looking at the Greater Chaco Landscape at a different scale than is pursued by the agencies. Typically, federal agencies in the western United States treat cultural sites as single phenomena during the Section 106 process. Thus, archaeological contractors identify sites or Traditional Cultural Properties (TCPs) during projects, and the projects are redesigned, in most cases, to avoid the resources by 50–100 feet. In rarer cases, such as road alignments, the decision is made to conduct test excavations to mitigate effects on the cultural resources.

While this avoidance policy has spared many cultural resources from outright destruction, it creates a highly fragmented cultural landscape across many places of the American West, and in particular, across the Greater Chaco Landscape. As a result, substantial indirect and cumulative effects have built up across Greater Chaco, as the ancient Chacoan-Puebloan landscape has been slowly but persistently in-filled by the industrial infrastructure of the oil-gas industry.

In our view, a better perspective looks at cultural sites not in isolation, but as pieces of larger communities on the landscape. This community- or landscape-based approach has been part of

archaeological research for nearly 25 years, but it is rarely followed by Agencies. Although the BLM lands in Greater Chaco are currently leased at more than 90 percent, this landscape-level approach can be implemented to protect communities and site clusters that have not yet seen impacts, such as those seen at the Pierre's Community (see Van Dyke 2017).

Six site cluster/communities were studied: Pierre's Community, North of Pierre's cluster, Split Lip Flat and Ah-She-Sle-Pah road cluster, Kin Indian-Escavada-Greasy Hill Community, Bis san'ni Community, and Chaco Northeast site cluster (see map).



To add to what Van Dyke's study has revealed and what prior BLM GIS-based analysis also showed, we compiled a map of the Pierre's Community and then overlaid the current BLM area of critical environmental concern (ACEC) that was put in place years ago in an effort to protect the community and keep oil-gas development away. Again, as Van Dyke has clearly illustrated, the number and density of oil-gas well pads and other facilities has compromised the viewshed and soundscape around the Pierre's Community. Our study and mapping exercise further amplify this message.

Sites in the ancient Pierre's Community and site cluster encompass at least 160 sites of varying ages (primarily Chacoan with some Archaic, Early Navajo, and Historic Navajo manifestations), with the BLM's ACEC zones of protection shown. The ACECs were designed to protect Pierre's and two sections of the

Great North Road, both north and south of the community. However, the ACECs cut through the middle of the community—protecting some sites but offering no protection for outlying sites that are part of the ancient and historic community. Although the Pierre’s Community is recognized as part of the Chaco Culture World Heritage designation, beyond BLM small ACECs, this amazing place has not been considered holistically and is not adequately protected from oil-gas or other development.

Slightly north of the Pierre’s Community, near the northern margin of the 10-mile zone, is a site cluster described as “North of Pierre’s.” It includes more than 100 sites of primarily historic Navajo and Archaic ages that lie on predominantly BLM lands. Beyond the initial recording of these sites on various projects, little additional research has been completed. At present, we do not know whether these sites constitute one or more discrete cultural communities. Additional research is necessary to better understand this very interesting site cluster. The density of sites in this cluster was the main reason that the withdrawal boundary shows a slight extension in this area. Currently, this cluster of sites has little protection.

West of the Pierre’s Community, we come to another dense cluster of sites identified as the Split Lip Flats cluster, after a local topographic feature. This very dense cluster contains at least 266 sites that are primarily of Middle-Late Archaic, Basketmaker II, and Pueblo I–III origin, located primarily on BLM-managed lands. The Chacoan road known as the Ah-She-Sle-Pah road runs northwest from just below the Chaco Canyon sites of Penasco Blanco and pointing to the core of the Split Lip Flats cluster. Although it has hardly been documented, there is a Pueblo II community in this cluster on the road alignment. More research would help us understand this area northwest of Chaco’s boundary. There is an ACEC that encompasses a small portion of the Ah-She-Sle-Pah road, providing some limited protection. The bulk of this dense and poorly understood site cluster and community lies on BLM lands, and it is not protected in any way.

Next, we move to the east, past Chaco’s boundary and to the community known as Bis san’ni. This Chacoan community was well studied in the late 1970s and early 1980s by Cory Breternitz, Mike Marshall, and others. The community encompasses at least 61 sites that are predominantly Pueblo II in age. Earlier and later Pueblo sites are present, as well as Archaic and Historic Navajo age sites. On the north, the community is largely bounded by the wide swath of Escavada Wash. BLM land is but a small percentage in the Bis san’ni area, mostly on the north end of the Chacoan community. Although Bis san’ni is recognized as a unique Chacoan Outlier, it is afforded no special protection, and oil-gas wells could be placed in close proximity to the community.

Lastly, we move north of Bis san’ni to a location near the northeast edge of the 10-mile zone. This site cluster is the smallest, with 30 sites, and is identified as the Northeast of Chaco site cluster. The sites are split between Historic Navajo camps and settlements dating between 1880 and 1960, and a range of Archaic and likely Archaic camps and artifact scatter sites. Similar to the North of Pierre’s site cluster, these sites are known only through limited, survey-level documentation. Data show the presence of a Navajo community in the area, from 1880 to 1960. Nevertheless, additional research is required to better understand the Navajo community and to tease out the parameters of Archaic period settlement in the cluster, from 5500 to 800 BCE. This site cluster is probably the most at-risk of all discussed here, because companies working in the Mancos Shale oil development have placed many wells in the area just beyond the site-cluster boundary and the 10-mile boundary. If the BLM and BIA do not honor the 10-mile protection zone in this area, it is very likely that the sites in this cluster will become mere islands

of “preserved” remnants of Navajo and Archaic cultures embedded within a highly industrialized modern landscape.

The group of six ancient and historic communities and site clusters discussed here is just a sample of those that lie within the 10-mile protection zone. Along with the 10 previously documented and described Chacoan communities, they clearly illustrate the high density of cultural and historic sites in this area directly adjacent to CCNHP. These findings again reinforce our understanding that the 10-mile zone of protection is not an arbitrary boundary. The 10-mile zone contains irreplaceable ancient and historic sites and communities that merit much more protection than BLM and BIA policy and regulations currently provide.

### **Recent and Ongoing Tribal Cultural-Ethnographic Projects in Greater Chaco**

Two recent projects have provided some ethnographic data on the Greater Chaco Landscape: 1) the Pueblo of Acoma’s 2018 project with Archaeology Southwest (Anschuetz et al. 2019), and 2) the Navajo-Gallup Water Supply Project (NGWSP). Dozens of traditional cultural properties (TCPs) were revealed during the Acoma Project within the 10-mile zone, indicating that there are probably hundreds, if not thousands, of TCPs and other significant ethnographic resources as yet unidentified across the Greater Chaco Landscape. Furthermore, during the NGWSP, Tribes have identified hundreds of traditional cultural properties and other ethnographic resources within the Greater Chaco Landscape and emphasized the continued importance of this landscape within each Tribe's cultural traditions.

Currently, in association with the Chaco Heritage Tribal Association, six Pueblos are working on studies that address their connections to the Greater Chaco Landscape. In addition, the Navajo Nation is also working on a study on its associations with the Greater Chaco Landscape. These studies will add immeasurably to our understanding of the 10-mile zone and the broader landscape. A failure to protect Federal lands in the 10-mile zone would undoubtedly result in loss of sensitive cultural resources.

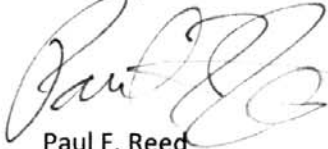
In addition to the archaeological and ethnographic resources within the Greater Chaco Landscape, there are other scientific aspects of the landscape to consider, including the CCNHP’s International Dark Sky designation and the incredible viewsheds and soundscapes Ruth Van Dyke (2017) and other archaeologists are only beginning to document. Additionally, the 10-mile zone encompasses much of the CCNHP’s viewshed, and visitors are able to view and appreciate the significance of the largely-undeveloped landscape surrounding the CCNHP from Pueblo Alto, Pueblo Pintado, and several other locations. Finally, Chaco Culture National Historic Park and several outlying sites are UNESCO World Heritage Sites.

These values plainly underscore that the 10-mile zone of protection is not arbitrary. The 10-mile zone contains irreplaceable ancient and historic sites and communities that merit greater protection than BLM and BIA regulations currently provide. This reinforces the need for permanent withdrawal of the 351,000 acres in Secretary Haaland’s order, as well as the need for legislation to permanently remove the threat of future oil-gas development from this land.

In summary, we offer our full support for the BLM's current initiative to withdraw 351,000 acres of Federal surface and subsurface lands in the 10-mile zone around Chaco from oil-gas development for a period of 20-years. There is every reason to permanently protect these lands.

Thank you for the opportunity to provide commentary on this most important issue.

Sincerely,



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Chaco Scholar at Salmon Ruins Museum  
Preservation Archaeologist  
Archaeology Southwest

#### References

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Cc:

Deb Haaland, Secretary of the Interior  
Tracy Stone-Manning, Director, Bureau of Land Management  
Mark Mitchell, Chairman, All-Pueblo Council of Governors  
Charles F. Sams III, Director, National Park Service  
Nada Culver, BLM, Deputy Director for Programs and Policy  
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