



***NEW MEXICO ARCHEOLOGICAL COUNCIL***  
P.O. Box 25691, Albuquerque, NM 87125

May 6, 2022  
Sarah Scott  
CCNHP Area Withdrawal  
Bureau of Land Management  
Farmington Field Office  
6251 College Blvd., Suite A  
Farmington, NM 87402

Dear Ms. Scott:

Thank you for the opportunity to provide input on the proposed Chaco Culture National Historical Park (CCNHP) area land withdrawal. The New Mexico Archeological Council (NMAC) is a New Mexico-based nonprofit organization whose purpose is to maintain and promote the goals of professional archaeology in New Mexico. NMAC strongly supports this proposal and encourages the Bureau of Land Management (BLM) to act swiftly to ensure protection for the next 20 years for the very culturally sensitive 10-mile zone around Chaco.

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.

A search of the New Mexico Cultural Resources Information System (NMCRIS) database reveals more than 4,200 archaeological and historic sites in the protective zone. These places were created by diverse groups—including peoples of the Paleoindian and Archaic archaeological traditions, 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 cultural site count is undoubtedly much higher.

At least 10 significant ancient Chacoan-style communities are known to lie within and just beyond the 10-mile zone around CCNHP. The characteristics and condition of which merit additional study and protection from oil-gas development, and are discussed in detail below:

- 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 Chacoan 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.
- 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 Chaco Park 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 Park 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.

Recent work by Archaeology Southwest focused on a group of six ancient and historic communities and site clusters that contain hundreds of cultural sites (Reed 2020). These six areas are just a sample of those that lie within the 10-mile protection zone. Along with the ten previously documented and described Chacoan communities, however, they clearly illustrate the high density of cultural and historic sites in this area directly adjacent to Chaco Park. These findings again reinforce the idea that the 10-mile zone of protection is not an arbitrary boundary. The 10-mile zone contains irreplaceable ancient and historic sites, communities, and landscapes that merit much more protection than BLM and BIA policy and regulations currently provide. 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.

The site avoidance policy pursued by the BLM, BIA, and other Agencies has spared many cultural resources from outright destruction but has also resulted in a highly fragmented cultural landscape across many places of the American West, and in particular, across the Greater Chaco Landscape. As a result, many indirect and cumulative effects have built up across the Greater Chaco Landscape as it 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 has not yet appeared in the Agencies' playbook. 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).

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.

### References

Anschuetz, Kurt, Paul F. Reed, Juana Charlie, Kim Charley, Chris Garcia, Damion Garcia, Everett Garcia, Bonnie Leno, Karl Pedro, and Darwin Vallo, 2019. *Pueblo of Acoma Advocacy and Preservation Study of a Portion of the Greater Chaco Landscape*. Draft report to BLM, in progress. Archaeology Southwest Report 2019-103.

Reed, Paul F., 2020. *An Archaeological Reconnaissance of Chaco's 10-Mile Zone of Protection*. Archaeology Southwest Report 2020-102, Tucson.

Van Dyke, Ruth, 2017. *Impacts of Oil and Gas Drilling on Viewscapes and Soundscapes at the Chaco Outlier of Pierre's, San Juan County, New Mexico*. Report submitted to BLM-Farmington Field Office and BIA-Navajo Regional Office as part of Resource Management Plan amendment and draft EIS scoping, February 2017.

Sincerely,

A handwritten signature in black ink, appearing to read 'CK Chavez', written in a cursive style.

Christina Chavez, President  
New Mexico Archaeological Council