

Public Comment Objection to Proposed
Revocation of Public Land Order No. 7923

Submitted by: Concerned Citizen

Agency: Bureau of Land Management,
Farmington Field Office

Project: Evaluation of Potential Revocation of
Chaco Withdrawal

Docket / Project ID: D949F582-[402D-](#)
[F111](#)-8341-001DD804183B

Subject: Objection to revocation of Public Land
Order No. 7923 affecting public lands
surrounding Chaco Culture National Historical
Park

To the Bureau of Land Management:

This comment objects to the proposed
revocation of Public Land Order No. 7923 and
urges the Bureau of Land Management to select
the No Action Alternative.

Public Land Order No. 7923 withdrew

approximately 336,404 acres from mining and mineral leasing for 20 years, subject to valid existing rights. The Bureau is now considering whether those protections should be revoked in full or in part.

The withdrawal should remain in place because Chaco Culture National Historical Park and the greater surrounding landscape contain exceptional cultural, archaeological, and spiritual resources. The 10-mile protection zone was established to safeguard the landscape around Chaco and thousands of identified cultural sites. The current environmental review includes alternatives for full revocation and partial revocation that would reopen lands outside a 5-mile buffer. Reopening lands on that scale would expose the area to irreversible disturbance, even though the broader 10-mile framework was adopted to protect the

surrounding cultural landscape rather than only the immediate park boundary.

The administrative history also weighs against rollback. The 2023 withdrawal followed an extended public and administrative process, while the newer reversal effort has moved on a much shorter timetable, raising concern about whether tribes, residents, and other stakeholders are being given a meaningful opportunity to respond.

That concern matters because effective comments should be evaluated on the facts, analysis, and relevant sources they provide, not treated as a simple tally for or against the proposal. A lawful and reasoned decision should therefore give substantial weight to the protective purpose of the existing order, the sensitivity of the greater Chaco landscape, and the reality that damage from renewed leasing pressure may occur long before later mitigation

measures can be shown to work.

Public Land Order No. 7923 already reflects a balanced approach. It leaves valid existing rights intact while preventing new mineral leasing and mining claims in the 10-mile area previously determined to need protection. That structure preserves legal fairness without discarding the core safeguard.

Revocation is therefore unnecessary and unsound. Instead of improving land management, it would remove a targeted protection that was specifically crafted to shield public lands surrounding Chaco from new mining and leasing pressures.

A partial revocation reducing the buffer to 5 miles should also be rejected. That option would reopen lands beyond the reduced radius to mining and mineral leasing and would undercut the purpose of the existing 10-mile withdrawal established to protect the broader

Chacoan setting.

Accordingly, this comment requests that the Bureau of Land Management:

Reject Alternative 1, the full revocation of Public Land Order No. 7923.

Reject Alternative 2, the partial revocation reducing protection to a 5-mile buffer.

Select the No Action Alternative and keep the 10-mile withdrawal in effect for the full term already established.

Fully explain in the final decision how the agency evaluated impacts to cultural landscapes, archaeological resources, and tribal interests before considering any reopening of these lands. Ensure that the administrative record reflects the strong public interest in maintaining durable protections around Chaco Culture National Historical Park.

Please include this comment in the

administrative record for the above docket. The proposed revocation should be denied, and Public Land Order No. 7923 should remain in force.