

**Counselor Chapter House • Counselor Citizens HIA- Hózhóogó na'adá Committee
Diné Citizens Against Ruining our Environment • Indigenous Cultural Concepts
Laguna Acoma Coalition for a Safe Environment • Southwest Native Cultures
Spotted Eagle Surveying • Tewa Women United
350.org New Mexico • Atrisco Truck Farm • Campaign to End Sacrifice Zones
Chaco Alliance • Earthworks Food & Water Watch • Frack Free 4 Corners
Frack Free NM • Multicultural Alliance for a Safe Environment • New Energy Economy
NM MoveOn.org • New Mexico Story Power • Northern Rio Grande Chapter Sierra Club
Our Revolution New Mexico • PNM Shareholders for a Responsible Future
Rio Arriba Concerned Citizens • San Juan Citizens Alliance • Sierra Club Rio Grande
Western Environmental Law Center • WildEarth Guardians**

January 30, 2018

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**Re: The BLM is Not Considering a Reasonable Range of Alternatives for the
Farmington Resource Management Plan Amendment and Protecting the Greater
Chaco Region**

Dear State Director Seidlitz and District Manager Barr:

We are writing to express serious concerns over the purported range of reasonable alternatives the Bureau of Land Management is attempting to bring forward for consideration as part of amending the Farmington Field Office Resource Management Plan (RMP). We are greatly concerned that the agency's planning process will not effectively resolve conflicts in the Greater Chaco region by appropriately protecting the people of this landscape, its cultural values, and its importance for clean air and water.

On January 24, 2018, we received notice that the agency will only be considering four action alternatives—A, B, C, and D—for the Farmington RMP Amendment. While the BLM

has yet to provide full details to the public regarding the alternatives, what the agency has released so far is very troubling.

First and foremost, the Farmington Field Office has already leased over 91% of available lands for oil and gas development placing us past the point where resource balance can be achieved and making “No Leasing” the only reasonable alternative, yet it is missing from the draft range. This is incredibly discouraging given that the BLM has considered such an alternative in other planning processes, including most recently in the neighboring Tres Rios Field Office of Colorado. It’s further discouraging given that tens of thousands of Americans have urged the BLM to consider a “No Leasing” alternative as part of its RMP Amendment. What’s more, the BLM has discretion to decide when and where to lease for oil and gas under the Mineral Leasing Act, meaning such an alternative is fully consistent with federal law.

Our concern over the BLM’s refusal to consider a “No Leasing” alternative is underscored by the fact that the BLM is apparently moving to consider an alternative that maximizes oil and gas development, Alternative D.

Second, it appears that for every action alternative, the BLM still intends to accommodate a significant amount of oil and gas development in the Farmington Field Office. While the alternatives may provide varying levels of protection for certain resources and values in the Field Office, it seems that every alternative would continue to make oil and gas development the predominant use in the region. Suffice it to say, it does not appear that any action alternative seeks to establish any degree of meaningful balance between oil and gas and other uses in the region.

Thirdly, our concerns are bolstered by the fact that the action alternatives appear to pit non oil and gas-related resources and values against each other. For example, Alternative B appears to prioritize cultural resource protection while Alternative C prioritizes community health. To align tribal, cultural, environmental, and community health interests in conflict with each other bring up deep environmental justice concerns. It concerns us that these values would not be consistently and fully protected in every action alternative. And overall, none of the action alternatives appear to provide any kind of comprehensive protection for the cultural, natural, community, and other values in the Farmington Field Office.

Overall, it appears that every action alternative is about accommodating and prioritizing oil and gas development in the Farmington Field Office at the expense of other resources, values, and public lands and minerals uses. Put simply, as presented to us so far, **it appears the BLM may be moving to use the Farmington RMP Amendment to undermine, not protect, public health, the environment, and the cultural integrity of the Greater Chaco landscape.**

We share with you these concerns in the hopes that the agency will reassess whether the RMP Amendment process is on the right track and will live up to the BLM’s promise to ensure protection of the Greater Chaco region.

Sincerely,

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