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350 New Mexico * Accelerate Neighborhood Climate Action * Cactus Garden Apts * Call to Action Colorado * CAVU * Chaco Alliance * Citizens Caring for the Future * City of Santa Fe * Colorado Businesses for a Livable Climate * Common Ground Community Trust * Climate Change Leadership Institute * Concerned New Mexicans Group * Community for Sustainable Energy * Coyote Cliffs * Do Good * Earth Care * Earth Web at First Unitarian Church * First Congressional UCC Abq * Frack Free Four Corners * Frack Free NM * GreenLatinos * Green House Connection Center * Heartnsole * I-70 Citizens Advisory Group * Jemez Peacemakers * Littleton Business Alliance * Mayfair Park Neighborhood Association Board * Montbello Neighborhood Improvement Association * Multicultural Alliance for a Safe Environment * New Earth Counseling * New Energy Economy * New Mexico Climate Justice * New Mexico & El Paso Region Interfaith Power and Light * New Mexico Environmental Law Center * New Mexico MoveOn * New Mexico Sportsmen * New Mexico State Treasurer's Office * NM LAWS * Next 100 Colorado * North Range Concerned Citizens * Notable Healing Self Care and Sound Healing * PNM Shareholders for a Responsible Future * Pond Foundation * Rio Arriba Concerned Citizens * Rio Grande Indivisible NM Rocky Mountain Wild * San Juan Citizens Alliance * Sierra Club Rio Grande Chapter * Southwest Organization for Sustainability * SouthWest Organizing Project * Sturdevant Music Studio * Terra Advocati * Upper Gila Watershed Alliance Unitarian Universalist Fellowship of Otero County * Unite Metro North Denver * Veterans For Peace Santa Fe Chapter * We Are One River * Western Environmental Law Center * Western Slope Businesses for a Livable Climate * White Mountain Conservation League * WildEarth Guardians

198 methods * 350 Deschutes * 350 Eugene * 350 Hawaii * 350 Mass * 350 Seattle * Businesses for a Livable Climate Catholic Network US * Catskill Mountainkeeper * Citizens' Resistance at Fermi Two * Earthworks * Earth Action * Earth Ethics * Environmental Concerns Committee Kendal at Oberlin * Extinction Rebellion San Francisco Bay Area * Food & Water Watch * Friends for Environmental Justice * Friends of the Earth * Great Old Broads for Wilderness * Greater New Orleans Housing Alliance * GreenFaith * International Marine Mammal Project of Earth Island Institute * Indivisible Ambassadors * Institute for Policy Studies Climate Policy Program * Let's Green CA! * Mental Health & Inclusion Ministries Movement Rights * NJ State Industrial Union Council * North American Climate Conservation and Environment * Occupy Bergen County * Oil Change International * Port Arthur Community Action Network * Progressive Democrats of America RapidShift Network * Small Business Alliance * Save EPA * Stand.earth * Stop the War Machine * Sunflower Alliance System Change Not Climate Change * Waterkeeper Alliance * Wall of Women * Working for Racial Equity * Zero Hour

Feb 22, 2022

Secretary Deb Haaland
U.S. Department of the Interior
1849 C St. NW
Washington, D.C. 20240

Director Tracy Stone-Manning
U.S. Bureau of Land Management
1849 C St. NW
Washington, D.C. 20240

Re: Oil and gas extraction authorizations by the Bureau of Land Management threaten Honoring Chaco Initiative, cultural fabric of sacred Greater Chaco landscape

Dear Secretary Haaland and Director Stone-Manning:

We are grateful for your leadership and commitment around safeguarding the Greater Chaco region of northwestern New Mexico and supporting the Honoring Chaco Initiative. This sacred landscape is in great need of more comprehensive, protective, inclusive, and just land

and resource management. We greatly appreciate the steps President Biden and the Interior Department have taken to both address existential threats to Chaco Canyon, the heart of the Greater Chaco region, and the cultural integrity of the broader landscape.

That said, we are gravely concerned that the U.S. Bureau of Land Management is currently weighing the approval of dozens of new oil and gas development proposals that collectively could lead to the drilling of more than 100 new wells, the construction of miles of new roads, and new irreparable heavy machinery disturbance across hundreds of acres of lands in the Greater Chaco region.

In the interest of meaningfully and genuinely Honoring Chaco, we urge you to:

- **Direct the Bureau of Land Management to temporarily pause the approval of new oil and gas development in the Greater Chaco region.**
- **Direct that this pause be in place until the Honoring Chaco Initiative is complete.**

There is no denying that unchecked oil and gas development has degraded and despoiled the cultural integrity of the Greater Chaco landscape. Over the last several years, a surge in development has brought horizontally drilled and fracked oil and gas wells closer and closer to Chaco Canyon. This development has increasingly encroached upon Navajo communities and irreversibly altered lands that were previously undeveloped. In many cases, this development has impacted sacred landmarks, sites, and cultural resources. This development has increased public health risks and destabilized the region's infrastructure. Importantly, much of this development has occurred with no legitimate Tribal consultation and with complete disregard to environmental justice.

In the face of these impacts and ongoing threats, the Biden administration has endeavored to defend Greater Chaco and chart a new direction for collaborative land and resource management in the region. Under your leadership, the Interior Department has announced the "Honoring Chaco Initiative," which encompasses two unprecedented commitments to safeguard this culturally significant landscape: a withdrawal of unleased federal minerals within 10 miles of Chaco Culture National Historical Park and a new collaborative process to address the need for landscape-level management reforms.

The latter commitment is significant. The Greater Chaco landscape extends far beyond the 10-mile buffer around Chaco Culture National Historical Park. The extent of Chacoan civilization extended across northwest New Mexico and into southwestern Colorado, southeast Utah, and northeast Arizona. Great houses, roads, and extensive artifacts attest to the cultural significance of this land, which is sacred to Indigenous communities, Tribes, and Pueblos today.

The Bureau of Land Management has recently approved over a hundred new permits for oil and gas companies to drill and develop in the Greater Chaco region, including within and near the 10-mile buffer around Chaco Culture National Historical Park. Many of these drilling

authorizations have directly impacted lands and landmarks considered sacred or culturally significant to Navajo, Pueblo, and other Tribes in the region. Additionally, all of these drilling authorizations occurred without adequate Tribal consultation, free, prior, and informed consent, and consideration of environmental justice.

Further, the agency is currently weighing the approval of dozens of additional oil and gas development proposals. These not only threaten the cultural integrity of the Greater Chaco landscape, but threaten the integrity and legitimacy of the Honoring Chaco Initiative.

These pending proposals include, but are not limited to, the following projects under consideration by the Bureau of Land Management:¹

NEPA #, DOI-BLM-NM-	Project Name	County	Description
F010-2022-0016-EA	DJR's Nageezi Unit, E06-2308	San Juan	New oil and gas wells, new access roads
F010-2022-0015-EA	DJR's Lybrook, D21-2207 and E16-2207	Sandoval	New oil and gas wells, new pads, new access roads, flow lines
F010-2022-0012-EA	Lybrook Non-unit Lease Well, I20-2207, B29-2207, A29-2207	Sandoval	New oil and gas wells, new pads, new access roads, new pipelines
F010-2022-0004-EA	Nageezi Unit M25-2409, L26-2409	San Juan	New oil and gas wells, new pads, new access roads, new pipelines
F010-2021-0070-EA	Bisti L01-2512, #100H	San Juan	New pad, new access roads, new pipelines
F010-2021-0032-EA	Vision Hogback Deep 12-40, 41, 42	San Juan	New wells, new pads, new access roads
F010-2021-0032-EA	DJR Bettonnie Tsosie Wash Unit N15-2308 and L14-2308	San Juan	New wells, new pads, new access roads, new pipelines
F010-2021-0027-EA	DJR Gallo Canyon Unit M26-2306	Sandoval	New wells, new pads, new access roads, new pipelines
F010-2021-0007-CX	DJR Nageezi Unit 601H, 602H	San Juan	New wells
F010-2021-0005-EA	DJR Operating Crow Canyon Unit I19,	San Juan	New wells, new pads, new access roads, new pipelines

¹ More information regarding these proposals can be found on the Bureau of Land Management's ePlanning website at <https://eplanning.blm.gov/eplanning-ui/home>.

	P19, C20, E20, Crow Canyon WSW/CLF		
F010-2021-0027-EA	DJR Gallo Canyon Unit, M26-2306	Sandoval	New wells, new pads, new access roads, new pipelines
F010-2020-0040-EA	DJR Good Times Unit 102H, 105H	San Juan	New wells, new pads, new access roads, new pipelines
F010-2019-0089-EA	McDougall and Olson Natural Gas Wells	San Juan	New wells, new well pads, new access roads, new pipelines
F010-2019-0088-DNA	Kimbeto Wash Unit 795H Oil and Natural Gas Well	San Juan	New wells
F010-2019-0076-EA	Canyon Largo Units 2506 and 2507 Project	Rio Arriba	New wells, new pads, new access roads, new pipelines
F010-2019-0020-DNA	Kimbeto Wash Unit #787H Water Recycling Facility	San Juan	Construction of oil and gas wastewater processing facility
F010-2018-0074-EA	Lone Mesa Unit Master Development Plan	Sandoval	New wells, new pads, new access roads, new pipelines, new production facilities and associated infrastructure

In addition to these proposals, the Bureau continues to defend in court the illegal approval of hundreds of drilling permits, many of which are located within the 10-mile buffer around Chaco Culture National Historical Park. On December 16, 2021, Diné Citizens Against Ruining Our Environment, San Juan Citizens Alliance, WildEarth Guardians, and the Sierra Club filed an opening brief with the U.S. Court of Appeals for the 10th Circuit over these recent drilling permit approvals, most of which were authorized by the previous administration.²

The opening brief clearly details that these decisions are contrary to the 10th Circuit's 2019 ruling in *Diné CARE v. Bernhardt*. In that case, the Court found the Bureau of Land Management had illegally failed to address the cumulative environmental impacts of drilling and hydraulic fracturing in the Greater Chaco region. In spite of these legal deficiencies, Interior continues to maintain its support for these drilling authorizations.

Given all this, we are greatly concerned that while the Honoring Chaco Initiative proceeds, the Bureau of Land Management will continue to authorize expanded oil and gas development in the Greater Chaco region. This will have the effect of limiting options for future land and resource management, putting people and communities at risk, and undermining the

² This opening brief is available at https://pdf.wildearthguardians.org/support_docs/20221-12-16-Greater-Chaco-Drilling-Appeal-Opening-Brief.pdf.

cultural integrity of the landscape. More importantly, it will erode trust and confidence in the Biden administration's promises to change course in Greater Chaco.

Accordingly, as the Honoring Chaco Initiative moves forward, we request the following of the Interior Department:

- An immediate pause on all new oil and gas development authorizations, including drilling permits, in the Greater Chaco region. We request this pause remain in place until the completion of the Honoring Chaco Initiative, which must include completion of ethnographic studies in the region and comprehensive updates to the Resource Management Plans for the Farmington and Rio Puerco Field Offices that align land and resource management with the Honoring Chaco Initiative. The Farmington Mancos/Gallup Resource Management Plan Amendment - Environmental Impact Statement must be abandoned so that more comprehensive land and resource management planning under the Honoring Chaco Initiative may take place.
- A commitment to review the legality of all oil and gas development authorizations within the Farmington and Rio Puerco Field Offices that have occurred since 2017. As part of this review, we demand that all illegal authorizations be withdrawn and that all yet-to-be implemented authorizations be withdrawn.
- A commitment to not extend or otherwise suspend drilling permit expiration dates.
- A commitment to not offer more oil and gas leases for sale in the Greater Chaco region and to take steps to reduce the number of existing leases by not granting or renewing any lease suspensions.
- A commitment to meaningfully consult with Tribes and Indigenous peoples with ties to Greater Chaco. In undertaking consultation, we request adherence to principles of free, prior, and informed consent.
- Expedient completion of the mineral withdrawal for federal lands within 10 miles of Chaco Culture National Historical Park.

Again, we are grateful for your leadership and commitment around Greater Chaco. We simply ask that as the Interior Department and Bureau of Land Management follow through with the Honoring Chaco Initiative, that reasonable steps are taken to protect the landscape, communities, and the cultural integrity of the region. Please exercise forbearance and instill in us the trust and belief that the Biden administration is prepared to live up to the President's promises.

Sincerely,

Drew Hudson
198 methods
drew@198methods.org

Diane I Hodiak, Executive Director
350 Deschutes
dhodiak@350deschutes.org

Patricia Hine, President
350 Eugene
president@350eugene.org

Sherry Pollack, Co-founder
350 Hawaii
davidsher@juno.com

Carolyn Barthel, Executive Committee member
350 Mass
carolyncbarthel@gmail.com

Jim Mackenzie, Co-Coordinator
350 New Mexico
jim@350newmexico.org

Selden Prentice, Federal Policy Lead
350 Seattle
seldenpre@comcast.net

Karen Bueno, Leaders Team
Accelerate Neighborhood Climate Action
karenbueno@aol.com

Deborah Jiron, Vice President
AIM Albuquerque Grassroots
deborahjiron61@gmail.com

Beata Tsosie, Organizational Director
Breath of My Heart Birthplace
beata@breathofmyheart.org

Marie Venner, Co-Chair
Businesses for a Livable Climate
marie@vennerconsulting.com

Donna Detweiler, Owner
Cactus Garden Apts
donnadet@gmail.com

Marie Venner, Co-Chair
Call to Action Colorado
marie@vennerconsulting.com

Stefanie Klass, Co-Chair
CatholicNetwork US
stefanie.klass@gmail.com

Wes Gillingham, Associate Director
Catskill Mountainkeeper
wes@catskillmountainkeeper.org

Liliana Castillo, Deputy Director
CAVU
liliana@cavu.org

Taylor McKinnon, Senior Campaigner
Center for Biological Diversity
tmckinnon@biologicaldiversity.org

Anson Wright, Coordinator
Chaco Alliance
ansonw@comcast.net

Tasina Sapa Win, President
Cheyenne River Grassroots Collective
tasinasapawinsmith@gmail.com

Kayley Shoup, Community Organizer
Citizens Caring for the Future
kayley.shoup.ccff@gmail.com

Jessie Pauline Collins, Co-Chair
Citizens' Resistance at Fermi Two (CRAFT)
jessiepauline@gmail.com

Alan Webber, Mayor
City of Santa Fe
mayor@santafenm.gov

Robb Hirsch, Executive Director
Climate Change Leadership Institute
robb@takeresponsibility.us

Marie Venner, Co-Chair
Colorado Businesses for a Livable Climate
marie@vennerconsulting.com

Rev. William C. Renfro, P.G. Co-Founder
Concerned New Mexicans Group
bill.renfro@hotmail.com

Elaine Cimino, Director
Common Ground Community Trust
ecimino10@gmail.com

Fred Kirsch, Director
Community for Sustainable Energy
cforse.fred@gmail.com

Mr. Neal Jones
Coyote Cliffs
coyotecliffs@yahoo.com

Daniel E. Tso, **Chair Health, Education
and Human Services Committee, 24th
Navajo Nation Council**
danieltso@navajo-nsn.gov

Mario Atencio, Coordinator
Diné Allottees Against Oil Exploitation
mpatencio@gmail.com

Carol Davis, Director
**Diné Citizens Against Ruining Our
Environment (Diné CARE)**
carol.davis@dinecare.org

Charles D Goodmacher, Executive Director
Do Good LLC
doingoodconsultant@gmail.com

Elouise Brown, President
Dooda (NO) Desert Rock
thebrownmachine@hotmail.com

Elouise Brown, Secretary
Dooda (NO) Helium Extraction Organization
thebrownmachine@hotmail.com

Kendra Pinto ,Four Corner Indigenous
Community Field Advocate
Earthworks
Kpinto@earthworksaction.org

Mary Gutierrez, Director
Earth Action, Inc.
earthethicsaction@gmail.com

Miguel Angel Acosta, Co-Director
Earth Care
info@earthcarenm.org

Mary Guterrez, Director
Earth Ethics, Inc.
earthethicsaction@gmail.com

Marilyn O'Boyle, Earth Web Chair
Earth Web at First Unitarian Church
marilynlea@aol.com

Ted Wolner, Chair
**Environmental Concerns Committee, Kendal
at Oberlin**
twolner@bsu.edu

Leah Redwood, Action Coordinator
Extinction Rebellion San Francisco Bay Area
leahredwood@icloud.com

Ruth Striegel, Green Justice team leader
First Congregational UCC, Albuquerque
ruth.striegel@gmail.com

Jorge Aguilar, Southern Region Director
Food & Water Watch
jaquilar@fwwatch.org

Shannon Smith, Executive Director
FracTracker Alliance
smith@fractracker.org

Jenni Siri, Coordinator
Frack Free Four Corners
info@frackfreefourcorners.org

Rebecca Sobel, Coordinator
Frack Free New Mexico
rsobel@wildearthguardians.org

Soni Grant, Coordinator
Frack Off Chaco
sgrant@wildearthguardians.org

Elaine Tanner, Program Director
Friends For Environmental Justice
friendsforenvironmentaljustice@gmail.com

Raena Garcia, Fossil Fuels and Lands
Campaigner
Friends of the Earth
rgarcia@foe.org

Shelley Silbert, Executive Director
Great Old Broads for Wilderness
shelley@greatoldbroads.org

Nichelle Taylor, Policy Development &
Implementation Program Director
Greater New Orleans Housing Alliance
ntaylor@gnoha.org

Sara Shor, Organizing and Campaigns Director
GreenFaith
sara@greenfaith.org

Ángel Peña, Public Lands
GreenLatinos
angelpena@greenlatinos.org

Harmony Cummings, Co-Founder
The Green House Connection Center
harmonycharlee1@gmail.com

Nancy Arenas, Founder
HeartnSole LLC
heartnsole3@yahoo.com

Cheryl Barnds, Water Protector
Honor the Earth
cheryl@honorearth.org

Rachael Lehman, Healthy Communities Chair
I-70 Citizens Advisory Group
lehman.rachael@gmail.com

Dallas Goldtooth, KIITG Campaigner
Indigenous Environmental Network
dallas@ienearth.org

Krystal Curley, Executive Director
Indigenous Lifeways
krystal@ourindigenouslifeways.org

Love Sanchez, Co founder
Indigenous Peoples of the Coastal Bend
indigenoupeoplecoastalbend@gmail.com

Philip Beck, Co-Founder
Indivisible Ambassadors
beck.philipr@gmail.com

Mark J. Palmer, Associate Director
**International Marine Mammal Project of Earth
Island Institute**
markjpalmer@earthisland.org

Basav Sen, Climate Policy Director
**Institute for Policy Studies Climate Policy
Program**
basav@ips-dc.org

Rev. Glen Thamert, Coordinator
Jemez Peacemakers
jemezglen@gmail.com

Heidi Harmon, Senior Public Affairs Director
Let's Green CA!
Heidi@romerininstitute.org

Dennis Wilwerding, President
Littleton Business Alliance
djwilwerding@q.com

Debbie Thornburg, Coordinating Committee
**Mayfair Park Neighborhood Association
Board**
debjames323@gmail.com

Amy Petré Hill, Founder
Mental Health & Inclusion Ministries
revamy@mhministires.org

Emmett Hoblely, Co-Chair
**Montbello Neighborhood Improvement
Association**
emmetthoblely@gmail.com

Pennie Opal Plant, Co-Founder
Movement Rights
pennie@gatheringtribes.com

Susan Gordon, Coordinator
Multicultural Alliance for a Safe Environment
sgordon@swuraniumimpacts.org

Kirsten Wolfe, Counselor and Interfaith Minister
New Earth Counseling
newearthcounseling@gmail.com

Mariel Nanasi, Executive Director
New Energy Economy
mariel@seedsbeneaththesnow.com

Anni Hanna, Director
New Mexico Climate Justice
anni.hanna@gmail.com

Dr. Virginia Necochea, Executive Director
New Mexico Environmental Law Center
vnecochea@nmelc.org

Joan Brown, osf, Executive Director
New Mexico & El Paso Region Interfaith Power and Light
joan@nm-ipl.org

Mitch Buszek, Coordinator
New Mexico MoveOn
mitchb@newmexico.com

Oscar Simpson, State Chair
New Mexico Sportsmen
oscarsimpson3@yahoo.com

Tim Eichenberg, State Treasurer
New Mexico State Treasurer's Office
tim.eichenberg@state.nm.us

Alma Sanchez, Co-Chairwoman
The Next 100 Colorado
rsanchez@wildearthguardians.org

Carol Elaine Gay, President
NJ State Industrial Union Council
carolgay747@aol.com

Gail Evans, Attorney
NM LAWS
gailatwork@gmail.com

Jerry Rivers, Environmental Scientist
North American Climate, Conservation and Environment (NACCE)
jerry.rivers13@yahoo.com

Kristi Douglas, Co-Chair
North Range Concerned Citizens
c3kristi@gmail.com

Sheila Fox, Business Owner
Notable Healing Self Care and Sound Healing
notablehealing@gmail.com

Sally Jane Gellert, member
Occupy Bergen County
SJGUU@aol.com

Collin Rees, U.S. Program Manager
Oil Change International
collin@priceofoil.org

Wendy Volkmann, Co-Director
PNM Shareholders for a Responsible Future
pinontrees@gmail.com

Lola Moonfrog, President
Pond Foundation
pondripping@cybermesa.com

John Beard, Jr., CEO
Port Arthur Community Action Network
john.beard901456@outlook.com

Laura Stokes, State Co-coordinator
Progressive Democrats of America Central New Mexico Chapter
stokescorrales@comcast.net

Julia Bernal, Co-Director
Pueblo Action Alliance
julia.bernal@gmail.com

Cheryl Barnds, Co-Chair
RapidShift Network
risewiththesea@gmail.com

William Clark, President
Rio Arriba Concerned Citizens
cebollabill@gmail.com

Oscar Simpson, Public Lands Chair
Rio Grande Indivisible, NM
oscarsimpson3@yahoo.com

Alison Gallensky, Principal Conservation
Geographer
Rocky Mountain Wild
alison@rockymountainwild.org
Mike Eisenfeld, Climate and Energy Program
Director
San Juan Citizens Alliance
mike@sanjuancitizens.org

Hazel James-Tohe, Coordinator
San Juan Collaborative for Health Equity
hazbah4nm@gmail.com

Jeff Hart, Co-Founder
Save EPA
jeffhart@gmail.com

Miya King-Flaherty, Our Wild NM Organizer
Sierra Club - Rio Grande Chapter
miya.king-flaherty@sierraclub.org

Marie Venner, Chair
Small Business Alliance
marie@vennerconsulting.com

Anna Ramirez, Steering Committee
Southwest Organization for Sustainability
afancis@hotmail.com

Alejandría Lyons, Environmental Justice
Organizer
SouthWest Organizing Project
Alejandria@swop.net

Terry Sloan, Director
Southwest Native Cultures
tas@sloancompany.net

Sarah Siqiniq Maupin, Director
Sovereign Inupiat For A Living Arctic
siqiniq@silainuat.org

Nathan Taft, Senior Digital Campaigner
Stand.earth
nathan@stand.earth

Robert L. Anderson, Director
Stop the War Machine
citizen@comcast.net

Ernest W Sturdevant, CEO/Owner
Sturdevant Music Studio
erniews@msn.com
Jean Tepperman, Co-Coordinator
Sunflower Alliance
jeantepper@gmail.com

Maura Stephens, Coordinating Committee
System Change Not Climate Change
maurastephens1@gmail.com

Timothy Edward Duda, Director
Terra Advocati
timduda@aol.com

Donna Stevens, Executive Director
Upper Gila Watershed Alliance
director@ugwa.org

Roxanne Richardson, President
**The Unitarian Universalist Fellowship of
Otero County**
roxanne.richardson12@gmail.com

Fran Aguirre, President
Unite Metro North Denver
jaquirreja@aol.com

Kenneth Mayers, Chapter Secretary
Veterans For Peace - Santa Fe Chapter
kenmayers@vfp-santafe.org

Paddy McClelland, Co-Founder
Wall of Women
paddy@verdedenver.com

Kate Hudson, Western U.S. Advocacy
Coordinator
Waterkeeper Alliance
khudson@waterkeeper.org

Thomas Hollender, President
White Mountain Conservation League
thollender@gmail.com

Mark LeClaire, Organizer
We Are one River
mescladero@hotmail.com

Rose Rushing, Attorney
Western Environmental Law Center
rushing@westernlaw.org

Chris Calwell, Co-Chair
Western Slope Businesses for a Livable Climate
ccalwell@ecosresearch.com

Jeremy Nichols, Climate and Energy Program Director
WildEarth Guardians
jnichols@wildearthguardians.org

Renée Chacon, Executive Director & Co-Founder
Womxn from the Mountain
reneemchacon@gmail.com

Anna Ramirez, Organizer
Working for Racial Equity
afrancis_@hotmail.com

Seneca Johnson, YUCCA Campaign Organizer
Youth United for Climate Crisis Action
yucca@earthcarenm.org

Zanagee Artis, Executive Director
Zero Hour
zanagee@thisiszerohour.org

Tammy Parker, Environmental Specialist
Zuni Environmental Protection
tammy.parker@ashiwi.org

Cc Nada Culver, Bureau of Land Management Deputy Director
 Melanie Barnes, Bureau of Land Management Acting New Mexico State Director