

*Archaeology Southwest* □ *Conserve Southwest Utah* □ *Friends of Cedar Mesa*  
*Grand Canyon Trust* □ *National Parks Conservation Association*  
*National Trust for Historic Preservation* □ *Rocky Mountain Wild* □ *Sierra Club*  
*Southern Utah Wilderness Alliance* □ *Utah Diné Bikéyah* □ *Utah Rock Art Research Association*

March 2, 2021

Dear Acting Secretary of the Interior Scott De La Vega:

We the undersigned represent conservation organizations and heritage preservation organizations concerned about outstanding Bureau of Land Management oil and gas protests and unissued leases in Utah. There are five recent lease sales in Utah for which the protests have neither been granted nor denied and therefore the leases have not been issued. The Department of Interior should grant all outstanding lease sale protests, reject the lease offers, and refund the monies for these lease sales. This is a critical opportunity to address longstanding concerns from Native American Tribes and Pueblos, the National Park Service, elected officials, and conservation and preservation organizations about oil and gas development on public lands in Utah.

In Utah, the pending leases were offered for sale at BLM's September 2019, December 2019, March 2020, September 2020, and December 2020 sales, and total over 160,000 acres. These lease sales were conducted under the direction of IM 2018-034 that led to shortened comment periods, inadequate Tribal consultation, and rushed lease sales. These outstanding protests have created a situation of legal uncertainty for developers, land managers, associated Tribes, and protesting entities. Granting the protests is consistent with the Biden administration's stated climate goals, and would protect wildlife habitat, lands with wilderness characteristics, and cultural resources.

We would like to highlight one specific landscape that would benefit from the resolution of these protests and lease cancellation: the cultural landscape between Bears Ears, Hovenweep, and Canyons of the Ancients National Monuments in southeast Utah. These lands are the traditional and ancestral lands of Hopi, Zuni, Acoma, Jemez, Laguna, the Rio Grande Pueblos, Ute, Diné (Navajo), and Paiute people. They are an integral part of a larger, interconnected cultural landscape of archaeological sites and Indigenous history that bridges Chaco Canyon, Mesa Verde, Bears Ears, and beyond. These lands are currently managed by the BLM Monticello Field Office. The two pending lease sales included 28 leases totaling more than 40,000 acres in this landscape<sup>1</sup>. The cultural significance of the lands within these lease sales cannot be overstated: in fact, the BLM's records show the leases contain 705 known cultural sites while at the same time the parcels have seen as little as four percent cultural survey coverage.

There is a significant need for improved tribal consultation, ethnographic study, and identification and assessment of Traditional Cultural Properties in these lands between Bears Ears, Hovenweep, and Canyons of the Ancients. It is no surprise that the lease sales in this area were protested by multiple Tribal and non-governmental entities including the Pueblo of Acoma and the All Pueblo Council of Governors. We strongly urge the DOI to consider the cultural significance of this landscape in reviewing these outstanding protests.

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<sup>1</sup> BLM Utah State Office September 2019 DOI-BLM-UT-0000-2019-0003-OTHER\_NEPA and December 2019 DOI-BLM-UT-0000-2019-0005-OTHER\_NEPA.

The National Park Service (NPS) also raised concerns about the proposed leasing by Hovenweep National Monument, including potential effects on air quality, dark night skies, scenic values, soundscapes, groundwater quality and quantity, and prehistoric structures from earthquakes<sup>2</sup>. Referencing leases 4-25 miles from the park boundary, the NPS asked the BLM for deferrals and more detailed analyses in the associated Environmental Assessments. Granting the protests will resolve these resource conflicts.

We urge you to expeditiously grant these outstanding protests to honor Tribes and their traditional lands and protect our climate, wild places, and irreplaceable cultural and archaeological resources.

Sincerely,

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**Utah Rock Art Research Association**

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<sup>2</sup> National Park Service, Southeast Utah Group, Superintendent Kate Cannon. Letter to Canyon Country District Manager, Bureau of Land Management. NPS Comments on BLM Canyon Country District Environmental Assessment for March 2018 Oil and Gas Lease Sale. Oct. 23, 2017.

National Park Service, Hovenweep and Natural Bridges National Monuments, Superintendent, Jeannine McElveen. Letter to Sheri Wysong, Dec. 13, 2018.

National Park Service, Hovenweep and Natural Bridges National Monuments, Superintendent, Jeannine McElveen. Letter to Leah Waldner. June 29, 2019.

CC: Nada Culver, *Deputy Director, Policy and Programs, Bureau of Land Management*  
Elizabeth Klein, *Deputy Secretary, Department of Interior*  
Kate Kelly, *Deputy Chief of Staff-Policy, Department of the Interior*  
Shantha Ready Alanso, *Director of Intergovernmental & External Affairs, Department of the Interior*  
Shannon Estenoz, *Principal Deputy Assistant Secretary, Department of the Interior*  
Robert Anderson, *Principal Deputy Solicitor, Department of the Interior*  
Greg Sheehan, *State Director, Utah Bureau of Land Management*  
Mike Reynolds, *Regional Director, National Park Service*  
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Vernon Cody, *Superintendent of Hovenweep and Natural Bridges National Monuments, National Park Service*