

February 2026 email to BLM concerning chip sealing the Chaco Road

Dear Maureen Joe, BLM Field Manager, Jeffrey Tafoya, Assistant Field Manager, Lands and Renewable Resources et al.

Thank you for your response. When the BLM is presented with a project that has been widely commented on, and, in fact, decided in 2012, it is important to present accurate facts and an accurate history. And to explain why this project should even be open to consideration. The opening paragraph of the BLM's email is an affront to the numerous tribes, stakeholders, and organizations that provided extensive input on this topic and project going back to 2006. The primary concern has consistently been the impacts on the World Heritage Site itself, Chaco Culture National Historical Park, rather than the sites in and along CR7950, although there are also concerns about the lack of consultation on those sites. The Hopi, Zuni, and many others, raised numerous areas of concern about chip sealing the road; including, but not limited to, increased visitation, infrastructure overwhelm, archaeological preservation, staffing, the degradation of the visitor's experience, safety on CR7950, and the impact on the park's dark night sky. Even the Farmington News Times presented a more informative history in December of 2012 when San Juan County decided to walk away from the project altogether : "The Hopi refer to Chaco Canyon as "the place beyond the horizon." Because of increasing cost and staunch opposition to a road improvement plan, it will remain the place beyond chip sealing... The Hopi, one of the tribes linked to the ancestral Puebloans who inhabited Chaco Canyon a millennium ago, were "just adamantly opposed to the project," said Dave Keck, the county's public works administrator." (See expanded article in Quote #1 below).

Furthermore, the 2022 letters to the Navajo Nation and other tribes are long outdated and are insufficient as evidence of proper consultation. The letters also pledged an analysis under NEPA, and the project appears to be moving toward an attempted Categorical Exclusion (CE). This is unacceptable when a World Heritage Site sits at the end of the road. In addition, the claim that the roadway was 'not improved' in the letter sent to the tribes is demonstrably false; stabilized aggregate was applied in 2014, and apparently without proper consultation: "We have not been consulted on improvements to CR 7950 since 2012, and understand CR 7950 crosses Bureau of Land Management, Navajo Nation and New Mexico State land. Therefore, we share the Chaco Alliance's concerns that improvements have been made or are about to be made to CR7950 without consultation or compliance. Leigh J Kuwanwisiwma, Director, Hopi Cultural Preservation Office, August 25, 2015 (See expanded quote in Quote #2 below). The letters to the tribes should be corrected and resent.

It is important to reiterate that in 2012, months before San Juan County pulled out of the project, they agreed to a compromise of applying stabilized aggregate to the road instead of chip sealing. The language is informative and telling: "The preparation of an Environmental Assessment (EA)

began in 2009; the draft EA was put on hold and is now being reactivated with important changes. Previous public involvement has provided valuable direction to guide the project team towards a new Preferred Alternative to address diverse concerns about safety and access along CR 7950...The Preferred Alternative is to improve the road surface by applying stabilized aggregate rather than the chip seal paving that was proposed as an earlier preferred alternative....The following are the most common concerns heard regarding this project and its relationship to the CCNHP: Preserve the historically significant culturally sensitive national park and world heritage site...Do not encourage increase in visitor traffic” San Juan County Road 7950 Environmental Assessment for Road Improvements July 2012 Newsletter (See newsletter in Quote #3 below)

Nothing has changed since 2012. This issue was decided, and that decision set a precedent. Anecdotal evidence that precipitation has increased in the area was proposed in a private conversation, but this is false. Precipitation remains extremely low. In the last 25 years precipitation has fallen from an already low nine inches a year to six and a half inches a year. The forecast is for increasing drought.

Please provide copies of the correspondence between the BLM and the NMSHPO regarding this project. Please also provide copies of the ROW application for the chip sealing of the first three miles of CR 7950 in 2006, and also provide copies of the ROW application for the application of stabilized aggregate in 2014. Please resend letters to the tribes with corrected information and with a renewed request for consultation. We would like to receive copies of those letters as well as any response.

We welcome a meeting with the BLM to discuss our concerns and the schedule for this project as soon as possible. The BLM must have years of testimony and comments on file in opposition to the chip seal attempt. Please review the history you already have. Thank you for your consideration.

Sincerely,

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Quote #1: “We have not been consulted on improvements to CR 7950 since 2012, and understand CR 7950 crosses Bureau of Land Management, Navajo Nation and New Mexico State land. Therefore, we share the Chaco Alliance’s concerns that improvements have been made or are about to be made to CR7950 without consultation or compliance, and have or may adversely effect eligible site LA 160521 and three other sites previously identified in the survey report County Road 7950 Improvements Project, San Juan County, New Mexico prepared for URS Corporation, April, 2009, which states: The action-alternatives would have an adverse effect or potential adverse effect on four sites...Subject to consultation and comment, we recommend that the undertaking would have an adverse effect.” Leigh J Kuwanwisiwma, Director, Hopi Cultural Preservation Office, August 25, 2014

Quote #2: The Hopi refer to Chaco Canyon as "the place beyond the horizon." Because of increasing cost and staunch opposition to a road improvement plan, it will remain the place beyond chip sealing. San Juan County commissioners voted Tuesday to pull the plug on a plan years in the making to pave and improve an 8.25-mile stretch of County Road 7950 leading to Chaco Culture National Historical Park. Costs had risen to an estimated \$1.2 million. County officials said they also encountered opposition from environmental groups and reluctant federal officials. The Hopi, one of the tribes linked to the ancestral Puebloans who inhabited Chaco Canyon a millennium ago, were "just adamantly opposed to the project," said Dave Keck, the county's public works administrator.” Farmington New Times, December 2012

Quote #3:
“The use of Federal funds for the road improvements requires compliance with Council on Environmental Quality regulations implementing the National Environmental Policy Act (NEPA). The preparation of an Environmental Assessment (EA) began in 2009; the draft EA was put on hold and is now being reactivated with important changes. Previous public involvement has provided valuable direction to guide the project team towards a new Preferred Alternative to address diverse concerns about safety and access along CR 7950...New Preferred Alternative –Proposed Action Through the analysis of cultural, biological and community resources, and with

consideration of public input received to date, a new Preferred Alternative is being proposed. The Preferred Alternative is to improve the road surface by applying stabilized aggregate rather than the chip seal paving that was proposed as an earlier preferred alternative....What We've Heard from the Public to Date: The following are the most common concerns heard regarding this project and its relationship to the CCNHP: -Preserve the historically significant, culturally sensitive national park and world heritage site. -Do not encourage increase in visitor traffic."