



ART Statement on Department of Interior Records Destruction Request #DAA-0048-2015-0003

The
**Archivists
Round Table**
of Metropolitan
New York,
Inc.

November 26, 2018

National Archives and Records Administration (NARA)
request.schedule@nara.gov
fax: 301-837-3698
NARA (ACRA), 8601 Adelphi Road, College Park MD 20740-6001

P.O. Box 151
New York
NY
10274-0154

Subject: In regards to Department of the Interior: Records Destruction Request #DAA-0048-2015-0003

To Whom It May Concern,

The Archivists Round Table of Metropolitan New York (ART), a diverse group of more than 400 archivists, librarians, and records managers in the New York metropolitan area, respectfully submits the following written statement regarding the Request for Records Disposition Authority (DAA-0048-2015-0003) submitted by the Department of the Interior (DOI).

As information professionals, we are profoundly concerned by the DOI's request to change the schedule to destroy records going back 50 years as well as date forward from every agency within the DOI including the Bureau of Land Management, National Park Service, US Fish & Wildlife Service, US Geological Survey, Bureau of Safety and Environmental Enforcement, Bureau of Indian Affairs, and others. These important records touch on a range of subjects including oil and gas leases, mining, dams, wells, timber sales, marine conservation, fishing, endangered species, non-endangered species, critical habitats, and land acquisition. In the August 2, 2018 National Archives and Record Administration (NARA) appraisal memo, most of these records have been defined as "temporary" with the justification that they have "little to no research value."¹

We understand that NARA has been working with the DOI for several years to update the DOI's records retention schedule and that this work does not represent a significant break from past practice. But we disagree with NARA's appraisal of the value of many of these records, particularly those concerned with endangered species recovery, oil and gas extraction, and water quality. Many of these public records include years of compiled data that could be very important to agency employees, as well as to outside researchers. We urge NARA to gather public input,

¹ U.S. Department of the Interior, DAA-0048-2015-0003, by Jessica E. Blessman, College Park, MD: National Archives and Records Administration, 2018, https://altgov2.org/wp-content/uploads/DAA-0048-2015-0003_Appraisal_Memo.pdf (accessed November 26, 2018).



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including the input of specialists in these fields, about the long-term importance of these records, and we ask them to consider other methods of retention, such as keeping the records in an electronic format.

In addition, we strongly recommend that NARA deny the proposed change of “disposition authority”² from individual bureaus to the office of the Secretary of Interior, a cabinet-level political appointee, which could overly politicize records retention across the entire agency going forward. This is a centralization of authority that seems unnecessary; the bureau heads, who may have different priorities than the Secretary of the Interior and from each other, and who deal with widely different areas of activity and subsequent records creation, need to be able to make records disposition requests separately, in the service of the public interest.

Finally, we urge NARA to make this process far more accessible, transparent, and user-friendly in the future. While we understand that all records cannot and should not be retained, and that the appraisal process is complex and has been developed over many years of dealing with government records, NARA’s system as it stands does not ensure that the public is appropriately informed about these crucial decisions. As Department of Interior records comprise the very core essential evidence of the National experience, we request that NARA revisit their proposed appraisal and justification and appraise this request in line with NARA’s appraisal objectives defined in its own appraisal policy.

Thank you for your attention to this matter.
Sincerely,

Archivists Round Table of Metropolitan New York

² U.S. Department of the Interior, *Request for Records Disposition Authority*, DAA-0048-2015-0003, National Archives and Records Administration, 2018, https://altgov2.org/wp-content/uploads/DAA-0048-2015-0003_10-24-18_correct-version.pdf (accessed November 26, 2018).