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November 26, 2018

Submitted Via Email: request.schedule@nara.gov

National Archives & Records Administration
8601 Adelphi Road
College Park, MD 20740-6001

RE: DAA-0048-2015-0003

To Whom It May Concern:

Western Values Project (WVP) is writing to express concern with the Department of Interior Records Request for Records Disposition Authority, Records Schedule Number DAA-0048-2015-0003, the department's request to the National Archives to destroy records related to oil and gas leases, timber sales, endangered species recovery, and dams and land purchases. WVP urges the National Archives to deny this request. The request covers documents going back more than 50 years from every agency within the Department of Interior (Interior). The loss of these records would significantly jeopardize Interior's transparency and accountability to the American public.

As an organization that brings transparency to the public lands debate, WVP relies on Interior's records to ensure high-ranking officials are following applicable laws and to hold the agency accountable to its mission of conserving the nation's natural resources. WVP is concerned that this request to destroy older records could open the door for the destruction of similar types of records from the current administration, preventing the American public from ever determining whether high-ranking Interior officials, including Secretary Ryan Zinke and Deputy Secretary David Bernhardt, acted in the public interest or on behalf of their own personal and political agendas.

Interior's Lack of Transparency Under Zinke and Bernhardt

This request to destroy records is concerning but hardly surprising in light of Secretary Zinke and Deputy Secretary Bernhardt's history of hiding the details of their activities. Zinke's Interior Department has only fulfilled 10.53 percent of FOIA requests that WVP submitted, resulting in ten lawsuits. Of the 171 FOIA requests WVP has sent to Interior, 132 are still outstanding. Additionally, WVP discovered Secretary Zinke's use of a secret calendar to schedule meetings with industry groups, including Peabody Energy, the International Association of Drilling Contractors, and Dominion Energy, omitted from the official calendars. These efforts to hide meetings with industry groups, combined with Interior's failure to fulfill many of WVP's FOIA requests, demonstrate a culture that allows for corruption at the expense of America's public

lands. Giving Interior permission to destroy its records would only push the agency further into the dark.

Impact

Much of Interior's work involves ensuring government activities involving public lands follow applicable laws and are carried out effectively. This would not be possible without extensive documentation and record keeping. The importance of records holds especially true for the Interior's Office of Inspector General, which acts as internal audit and accountability mechanism, and relies on documents that facilitate the accountability process from each individual Interior agency. If this records destruction request is granted, the Inspector General cannot fully ensure that Interior employees are following the law. The records can never be accessible once they are destroyed.

WVP opposes the Department of Interior Records Request for Records Disposition Authority, Records Schedule Number DAA-0048-2015-0003. Interior cannot be held accountable without complete and total access to its records. WVP urges the National Archives and Records Administration to deny this request.

Sincerely,

Chris Saeger
Executive Director
Western Values Project