

November 26, 2018

Mr. David Ferriero
Archivist of the United States
National Archives and Records Administration
via e-mail: david.ferriero@nara.gov

Dear Mr. Ferriero:

The federal government performs a central role in the regulation of the environment and the management of natural resources. For historians and others with a need to understand the decisions, policies, and actions pursued by government and industry in such management, the records of these activities are vital. Given the consequential and potentially devastating long-term impact of climate change, for example, the ability to understand the history of policy related to the environment will have great consequences for the future of the United States and the wider world.

The current records disposition request from the Department of the Interior (DAA-0048-2015-0003) covers over 50 years and includes records from several bureaus and agencies within the Department of the Interior. We encourage NARA to use utmost care in the review of this request, and reconsider the potential historical value of records that cover the management of such vital natural resources as water use, endangered species, and critical habitats, among others. Historians of the environment, as well as those who study commerce, technology, agriculture, and many other areas of our history have strong interests in records that detail the workings of the Department of the Interior. Research on these topics is relevant for many areas of national life, including future policy making.

Another historically consequential activity covered in these records is the Department of the Interior's role related to indigenous affairs. Consider, for example the inclusion in the disposition request of the landmark case, *Cobell v. Salazar*. This class action suit, which lasted over 10 years, was brought against the Department of the Interior by Eloise Cobell and others claiming that the federal government had miscalculated the income from Indian trust assets. The case settled in 2009 for \$3.4 billion and has implications for the long and fraught history of relations between the US government and Native Americans.

While we understand that most federal government records are routine and few require long-term preservation, these records require judicious consideration, including consultation with historians in the fields relevant to the materials. The AHA is happy to provide NARA with the names of qualified scholars in these fields.

We also appreciate that this request is not unusual, and that confusion has arisen about both the nature of the schedule and the process. In order to avoid such misinformation the AHA also requests that NARA consider greater transparency in the records review process. While federal departments have been encouraged to present requests as "big buckets" to facilitate review, this makes it much more difficult for researchers and others with an interest in the records to obtain more information on records that

are being scheduled as temporary. Although we understand the need for efficiency, stakeholders need open processes to ensure government accountability and avoid confusion about what is contained within the series. Moreover, review by these knowledgeable scholars will help NARA staff to make informed decisions.

Sincerely,

A handwritten signature in black ink, appearing to read "James Grossman". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

James Grossman
Executive Director