



ASEH comment regarding NARA **Records Schedules; Availability and Request for Comments**

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The American Society for Environmental History (ASEH) wishes to register its concern about the recent Department of the Interior (DOI) Request for Records Disposition Authority. We recognize that NARA handled the DOI's request appropriately, but the scale of the request and the brevity of the public comment period have underscored fundamental obstacles to thoughtful and timely public participation in this process. As a scholarly organization, ASEH shares NARA's dedication to the preservation of historically important materials, and believes that opportunities remain for improving the system by which federal documents are handled.

ASEH is particularly concerned with the question of which documents might or might not possess "high potential research value." Researchers' views on this matter often differ from the initial appraisals of an agency like DOI, and so researchers must be afforded every opportunity to weigh in on agency decisions about document disposition. Given the scope of the DOI's "big bucket" request, the initial and even subsequent deadlines for public comment were insufficient. And misunderstandings in this case about whether NARA was in fact following proper procedure point to the need for better information—even among scholars—about what the procedure involves and where the public fits within it. Researchers could be better informed about specific requests as well as about the overall process for disposing of and preserving documents.

Achieving these aims will require that researchers and public agencies work together whenever possible. Many ASEH members have especially strong interest in DOI records, and so particular concern with whether those records are lost to posterity. Our strong preference, as a group of scholars concerned with people and nonhuman nature, is for maximum feasible protection of documents produced by entities such as DOI. ASEH urges NARA to consider how disposition schedules might be better made public, and how researchers such as ourselves could be better integrated into the decision-making process.

AMERICAN SOCIETY FOR ENVIRONMENTAL HISTORY