

February 27, 2020

Russell Vought
Acting Director
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Emily Murphy
Administrator
General Services Administration
1800 F Street, NW
Washington, DC 20405

Adam Bodner
Executive Director
Public Buildings Reform Board
1800 F Street, NW, Room 5116
Washington, DC 20405

David Ferriero
Archivist
National Archives and Records Administration
8601 Adelphi Road
College Park, MD 20740

Dear Acting Director Vought, Administrator Murphy, Director Bodner, and Archivist Ferriero,

We write as the chief librarians of the largest research universities in the Pacific Northwest to express how the sale of the **Federal Archives and Records Center located at 6125 Sand Point Way NE, in Seattle, Washington**, would damage our institutions and the communities and states we serve. The sale of the center, initially proposed by the Public Buildings Reform Board and recently approved by the Office of Management and Budget, would hurt and diminish the mission and activities of our institutions. Moreover, we are also deeply concerned by the process by which the decision to sell the facility was reached. We ask that you reconsider the decision to sell the facility until after further consultation with impacted communities to take public concerns into consideration.

Loss of Access to Historical Information and Records for Students, Researchers and the Public

The federal government has been entrusted with these historical archival documents. Access is essential, particularly for those most interested in ensuring that these documents help to tell and preserve our national and regional history, for learning, and teaching. The proposed relocation will make these documents even less accessible to scholars and the public, especially our tribal partners.

Pacific Northwest student and faculty research and scholarship will be harmed by this closure. As public universities, access to archives is essential to our ability to educate scholars and the public as well as our mission to preserve and enhance knowledge.

Access to original records in their context – While it has long been a goal to make more records accessible through digitization, digital representations cannot always replace the importance of the original documents. Some documents are important primarily because of their informational value, whereas others also have artifactual value which cannot be reproduced. Moreover, physically handling records and being able to understand each document in connection with other related documents will be a potential loss as those communities losing their records will be further distanced from their histories.

The concerns about the closure of the facility and the relocation of the records are not hypothetical. The following examples illustrate the real impact that would be caused by the relocation of the records.

- **University of Washington (UW)**

Service to and utilization by UW and the public: The Seattle NARA facility is used on a regular basis by University of Washington students, faculty, and staff as well as the broader public in the Northwest.

Researchers of all levels have a complex of regional history available to them in the Seattle area. Individual and groups of researchers planning trips to Seattle can consult with a multitude of archival resources relating to the Pacific Northwest region including those at the University of Washington Libraries Special Collections, the Museum of History and Industry (MOHAI), the Seattle Municipal Archives, and the National Archives, just to name a few. Removal of the National Archives at Seattle will sever the National Archives and Records Administration (NARA) from this network of rich resources for Pacific Northwest research. Researchers—local, national and international—rely on the proximity of NARA’s federal records to other complementary, related collections held in these regional facilities; closing NARA would greatly limit their ability to access important historical records on a wide range of subjects.

In addition, UW librarians are contacted by researchers, students, and faculty who are often searching for primary documents and records. The staff work with them—who are physically located in the Northwest—to determine the location of the materials that are needed to ensure that the time and resources spent going to different libraries and facilities, including the NARA facility, are minimized. The topics of research vary, from law and civil rights to military records and family history and other areas in between. Both UW-affiliated individuals and members of the public are referred to the NARA facility on a regular basis. Even UW librarians use the facility for their own research, for both current and past efforts.

Impact on Students: More locally, most of graduate students studying U.S. history at UW make use of these archives at some point in their careers, for research papers, journal articles, or their dissertations. In addition, having substantial local archival resources has helped the university to recruit top applicants who are interested in pursuing research based in the Western United States. Because graduate students, including those at UW, have very little travel funding, losing this major local resource would be nothing short of devastating to students’ development and potential for success in the field.

- **Washington State University (WSU)**

Making Historical Documents Accessible: WSU’s Center for Digital Scholarship and Curation (CDSC) is currently planning to digitize documents held at the NARA facility in Seattle for the [Plateau Peoples’ Web Portal](#) making them easily accessible to the public.

The curriculum in the Plateau Peoples’ Web Portal has been created by Tribal representatives from each of the partner Tribes. The basis of the curriculum is primary source material from national and regional repositories including the Smithsonian Institution, the Library of Congress, Washington State University’s Manuscripts, Archives and Special Collections, Gonzaga University Archives and Special Collections and the Northwest Museum of Arts and Culture. The curriculum is meant to aid educators and learners in various settings both formal and informal and to help Washington State’s public comply with Senate Bill 5433, which requires tribal histories be taught in every grade.

Providing our educators access to these records exposes them to information on the history of the Plateau tribes throughout the inland northwest. These materials will be selected by our tribal partners and will include the work WSU faculty and students are doing with the Colville and Yakima Nations. However, this work will be cost prohibitive if the collections are moved out of state.

In addition, WSU's Dr. Melissa Parkhurst used the student records at NARA extensively to chronicle the powerful uses of music in the assimilation-based curriculum at Chemawa Indian School, the oldest continuously operating federal boarding school. Stories from Chemawa students, 1880-2014, are documented in the book, *To Win the Indian Heart: Music at Chemawa Indian School*. Over 30,000 students have attended Chemawa, an institution that has intimately impacted tribal families and communities across the west. This project would not have been possible without access to the archives at Sand Point.

Learning from History: The cultural and multigenerational effects of Indian boarding schools on one family's history is the subject of a new exhibit in WSU's Manuscripts, Archives and Special Collection. Dr. Robbie Paul curated the current exhibit in the WSU Libraries department of Manuscripts, Archives, and Special Collections (MASC) titled "Grandfather's Trunk, Spirit of Survival: Three Generations of the Paul Family's Native American Boarding School Experience." Through access of the public documents at NARA, Dr. Paul pieced together key details of her family's experience by consulting boarding school records in Seattle's Sand Point facility. Connecting our community to their native heritage, Dr. Paul is able to highlight the experiences of her family in Indian boarding schools where trauma occurred and share the early history of her great-great-grandfather, Chief Ut-Sin-Malikan, the first to see the loss of the old Native American ways and of Nez Perce identity in his lifetime. Highlighting these experiences are not only connecting the community to the lives of the native people, but educating on the actions of our past so they don't happen again. Without access to the NARA records, this exhibit at WSU's Terrell Library would not have happened.

- **Oregon State University (OSU)**

Critical resource for faculty research. Oregon State University faculty researchers in the liberal arts fields of history and anthropology have relied on the Seattle NARA facility over the past 20 years. For example, the Seattle NARA facility served as a critical resource, providing a rich trove of sources, for the writing of *American Forestry: A History of National, State, and Private Cooperation* (1985), a work focused on federal fire policy and relations between federal agencies, state governments, and private corporations in the Pacific Northwest. Among the many archives, both national and regional, providing primary source materials, the Seattle Branch was the equal of regional materials for the Southeast Region in Atlanta, the Rocky Mountain Region in Denver, and the forestry related materials in the Pacific Region offices, then in San Bruno, California.

Relocation Impact on Research Costs and Expenses: OSU faculty describe the Seattle NARA archivists as exemplary, with the necessary in-depth knowledge of the collections. The demonstrated knowledge of the archivists has proven essential time and again to assist visiting researchers efficiently and effectively navigate the collections to review and recover missing parts of the region's tribal histories from the 19th and 20th centuries. The archivists' deep familiarity with the facility help faculty understand how the archives are structured to help them prepare in advance and to optimize their time reviewing the collection at the facility itself. Based on faculty experiences at the Seattle NARA facility, there is a

common sentiment that the value of the Seattle facility would best be measured by the importance of regional access to the comprehensive collection of records to be accessed when needed, and the importance of knowledgeable archivists with deep familiarity of the structure and content of the collections to facilitate review and public engagement, not by the amount of time that researchers spend at the facility itself. Relocating the facility will disrupt these essential values of the Seattle NARA facility and further challenge the cost-effective access of these important public records for understanding and communicating Northwest history.

Impact on Students. Just as important, as a result of its relative proximity to campus, countless numbers of Oregon State University graduate students with very limited travel funds have made important use of the Seattle archives over the decades.

- **University of Oregon (UO)**

Impact on Undergraduate Research: Undergraduate classes have conducted research on Northern Paiute History and the indigenous people of the Great Basin, which includes southeastern Oregon. In recent years, more than twenty undergraduate students have traveled to Seattle to perform research on-site, some supported with fellowships and grants, as an integral experience in their development as scholars. Their work at the NARA Seattle facility has supported their publication of peer-reviewed articles; presentations at local, regional, and national academic conferences; and completion of independent, faculty-mentored undergraduate research projects submitted as writing samples for successful graduate school applications. The loss of this regional archive will diminish opportunities for student development and learning across many disciplines. It will become prohibitively expensive for undergraduate training to include experience working with the National Archives, the most significant archive of historical materials in the nation.

Threatening doctoral training: The University of Oregon and the Coquille Indian Tribe developed the Southwest Oregon Research Project (SWORP) in collaboration with the Smithsonian Institution. Access to materials housed in Seattle not only documented tribal governance and the history of Oregon's Southwestern tribes but also enabled nearly twenty people to earn graduate degrees, including fourteen PhDs and six master's degree, from the University of Oregon. Access to archival materials and the ability to collaborate easily with tribal leaders was essential. Moving the materials from the region, which is already geographically isolated in terms of travel costs, will harm advanced students' access to materials, scholars, and tribes. In an era when the public has rightly expressed concern about the increased cost of higher education, moving archival materials to two distant archives, each more than one thousand miles away, will dramatically increase research costs for those studying the history of the Pacific Northwest and the development and administration of federal policy in the region, adding to the financial burden of graduate education. About a third of current UO graduate students in history have research activities that depend upon the archives.

University-Public Collaborations: A faculty member has for more than twenty years worked closely with the Basque communities in Oregon, Idaho, and Nevada, sharing extensive source materials housed in Seattle. This work, and similar project to broaden public access to archival materials, will no longer be possible if the collections in Seattle are spread to archives in southern California and Missouri. The very act of moving these records to distant archives means that researchers studying the history of the Pacific Northwest will have no access to vital records for a period of years, while they are readied for shipment, shipped, unpacked, and inventoried. Thus, even ignoring the additional cost and time

involved in traveling to distant archives, for a long period of time, none of these vital records will be available at all. That means important research cannot be done, which will impact graduate students who are currently researching and writing dissertations and faculty scholars who are writing books on the history of the Pacific Northwest. At present, the archives in Seattle are vital resources for the research of nine doctoral history students at the University of Oregon, who are depending on the Seattle records center to be able to graduate and launch their careers. Moreover, a faculty research project about Oregon's public lands, which has engaged rural community members throughout the state, will be significantly delayed. Moving the archives will have a dramatic impact on the ability of these scholars to complete their research within externally imposed deadlines and thwart the research of even more scholars of the Pacific Northwest moving forward.

- **University of Alaska (UA)**

Making Alaska records more inaccessible: The National Archives facility in Anchorage, Alaska, was closed in 2014 and the records from that location were relocated to Seattle. This was a blow to the region and researchers interested in the history of Alaska, which was a federal territory between its purchase from Russia in 1867 and when it achieved statehood in 1959. With the pending move of materials from Seattle to California as a result of this sale, Alaska records will now be even further away from their source. Since Seattle is the repository for records created by Federal agencies in Alaska, Idaho, Oregon, and Washington, citizens from all of these states, including the students and faculty at the University of Alaska, will be impacted as they will have to travel much further to see most records since only a small percentage of these are digitized.

The removal of records from the state to a location even farther away, will make it much more challenging for Alaskan researchers to access all of the resources they need. Alaskans also express discontent with the move, which exports our own history to facilities where there are no subject specialists to assist those in need of information, making it harder to find. Locking up information in far-flung repositories is the opposite of the current trend of making archives more accessible and usable to everyone.

Alaska records have been moved before: We must also note that, when the decision was made in 2014 to close the Anchorage facility, NARA leadership indicated at that time that the records would be digitized, and that an effort would be made to reach out to stakeholders to prioritize records for processing. To date, no update has been provided regarding the digitization process.

If the sale of the property and the relocation of the materials do occur, the University of Alaska recommends that portions of the proceeds from the sale of the facility be used to subsidize researcher travel costs and for digitization of archival collections to make them publicly on line.

Lack of Consultation with Stakeholders

In addition to the negative impact the sale would have on our institutions collectively, as noted above, we are also troubled by the lack of local consultation with communities in Seattle and in the Pacific Northwest more broadly. The PBRB's own initial submission dated October 31 states, in part, that

"The Board has undertaken extensive effort to work with local and state officials [emphasis added] as well as Members of Congress for each recommended property to ensure the Board's solution and the ultimate sale meet the needs of the local community and return value to the federal government..."

Furthermore, the board's amended recommendation list from December 27 states as Step 5 of the process to developing the list of targeted facilities that the PBRB, "*Solicit[ed] input from stakeholders and public,*" [emphasis added] including seeking municipal engagement.

As members of the stakeholder community—both in physical proximity as well as being the users of the facility—we respectfully disagree that the stakeholders were appropriately consulted. While we acknowledge that the legislation that created the PBRB does not call for a public comment period, we believe that the stakeholders should have been engaged in a public and meaningful manner.

By contrast, the final December 27 recommendations state that, with respect to future outreach:

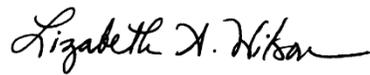
The PBRB and GSA will actively solicit input from the developer community [emphasis added] and work with city officials to understand and clarify redevelopment plans for this site. By reducing uncertainty around future entitlement, and increasing certainty around transaction timelines, qualified developers can increase the amount paid for the property.

We further note that while the public meeting held in the Los Angeles area on July 24 was actually held at the very same Laguna Niguel facility that was targeted for sale and included representatives from the City of Laguna Niguel on the agenda, no outreach of that kind occurred in the Pacific Northwest. As the federal records facility representing four entire states, we believe that similar outreach and consultation efforts should have taken place.

Conclusion

While we can appreciate the desire and need to consolidate federal facilities, for the reasons outlined above, we ask that you reconsider your decision to close the Federal Archives and Records Center and request that you engage in a more consultative process with the stakeholders.

Sincerely,



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Cc: Washington Congressional Delegation
Oregon Congressional Delegation
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