

January 14, 2019

David Bernhardt  
Acting Secretary  
U.S. Department of the Interior  
1849 C St. NW  
Washington, D.C. 20240

**Re: Request for Extension of Public Comment Period on Interior Department's Proposed Revisions to Freedom of Information Act Regulations, Docket No. DOI-2018-0017, Request for Public Hearings**

Dear Acting Secretary Bernhardt:

On December 28, 2018, the U.S. Department of the Interior proposed significant, expansive, and novel revisions to its Freedom of Information Act regulations that appear to undermine government transparency, defy the Freedom of Information Act, and erode the public's trust in the Department. *See* 83 Fed. Reg. 67,175 (Dec. 28, 2018). Worse, the proposed revisions have come amid a government shutdown, the holiday season, and a time of immense transition within the Interior Department with Secretary Zinke's departure.

**In light of these considerations, we request that Interior provide at least 120 days for the public to submit comments, with the 120-day comment period beginning when the government shutdown is resolved.<sup>1</sup> We further request that the Interior Department hold public hearings regarding its proposed rule changes.**

An extension of the public comment period and public hearings are imminently justified. In light of the government shutdown, which began on December 21, 2018, there are currently no Interior Department staff available to receive and review public comments. Furthermore, there is no certainty that public comment can even be submitted. Although Interior has directed the public to submit comments via the website, [regulations.gov](https://www.regulations.gov/), that site indicates that "continued systems operations cannot be guaranteed." *See* <https://www.regulations.gov/> (accessed Jan. 2, 2019). Although the public can mail comments, we have grave concern that Interior is likely to misplace mailed comments that are stockpiled during the shutdown.

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<sup>1</sup> At a minimum, we request the Department of Interior provide an additional 60 days for the public to comment on this complex rulemaking, which has the potential for limiting and adversely impacting important public rights under FOIA. Under similar circumstances, the Department of Interior has generally provided at least its "usual 60 days" for comments, and regularly grants requests for an extension time for comments. *See e.g., Application and Permit Information Requirements; Permit Eligibility; Definitions of Ownership and Control; the Applicant/Violator System; Alternative Enforcement Actions*, 63 Fed. Reg. 70,580 (Mar. 21, 1998) (providing the "usual 60 days"). Indeed, in its 2016 revision of the FOIA regulations, the Department provided 60 days for comment. *Freedom of Information Act Regulations*, 81 Fed. Reg. 11,124 (Mar. 3 2016); *see also Resource Management Planning*, 81 FR 89580-01 (Dec. 12, 2016) (90 day formal comment period); *Waste Prevention, Production Subject to Royalties, and Resource Conservation*, 81 Fed. Reg. 19,110 (Apr. 4, 2016) (60 days); *Waste Prevention, Production Subject to Royalties, and Resource Conservation; Rescission or Revision of Certain Requirements*, 83 Fed. Reg. 49,184 (Sept. 28, 2018) (60 days).

Additionally, given the shutdown, the public currently has no opportunity to gain a more robust understanding of Interior's proposal in order to provide informed and meaningful comments. There are no Interior staff currently available to answer questions regarding the proposed revisions. Although the proposal indicates that the public can contact Ms. Cindy Carfaro with the Office of Executive Secretariat for further information, Ms. Carfaro is not currently available due to the shutdown. What's more, although organizations have submitted Freedom of Information Act requests to obtain more background records regarding the proposed revisions, the Interior Department is not currently accepting Freedom of Information Act requests.

Finally, given the nature of Interior's proposed revisions, an extension and an opportunity to engage in public hearings is fully warranted. Interior is proposing revisions to its Freedom of Information Act regulations that appear to stretch beyond what any other federal agency has ever adopted or proposed in direct circumvention of the Act's purpose. Interior is proposing revisions that would allow it to deny Freedom of Information Act requests that may require what it calls "unreasonably burdensome" searches, to more easily deny fee waiver requests, and to delay providing responsive records. Such revisions are without precedent and diverge significantly from the Department's current regulations and the Freedom of Information Act itself.

Given the circumstances and the gravity of Interior's unprecedented proposed rule changes, an extension of the public comment period and public hearings is warranted.

We request the Department of the Interior acknowledge receipt of this letter as soon as possible and provide a written response to our requests. Thank you in advance for considering this request.

Sincerely,

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