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# Will the Last Archivist in Seattle Please Turn Out the Lights: Value and the National Archives

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## ABSTRACT

With the abrupt announcement in late January 2020 that the National Archives at Seattle—placed on 10 acres in the Sand Point neighborhood since 1963—would be “eventually” closed and the records moved to facilities in Riverside, California and Kansas City, Missouri, the surprised dismay from state archivists, researchers, and Native American tribal leaders and Alaska Natives who see their ancestors and heritage directly depicted in the records was quick and loud. The facility holds one million cubic feet of federal records which are accessed by over 700 people visiting its research rooms, and which grow by about 1300 cubic feet annually. In this examination of the National Archives at Seattle’s collections use—integrating staff perspectives with data from recent reports, budgets, and the accounting framework that informed the decision—we contribute an analysis of the digitization work proposed to replace in-person viewership, and an Indigenous and land-development view on the archival value assessments within the decision.

## Introduction

When news broke of the planned closure of the National Archives at Seattle (NAS) location, a number of organizations and communities mobilized against the decision through social media, online petitions, and resource-sharing through websites. Politicians, tribes, and cultural heritage institutions across Washington, Idaho, Oregon, and Alaska wrote letters to the Office of Management and Budget (OMB) condemning the decision, urging for a delay so alternative facilities could be assessed and the state could raise money to keep the archives local. A protest was staged outside NAS during a meeting between the National Archives and Records Administration (NARA) executives and Native American Tribe members.<sup>1</sup> All eight members of Washington’s Congressional Delegation and State Representatives sent a

1. Feliks Banel, “National Archives Tries ‘Re-Set’ with Tribes about Seattle Closure,” *MyNorthwest*, February 11, 2020, <https://mynorthwest.com/1715022/national-archives-tries-re-set-seattle-closure/>.

letter urging the OMB to reconsider the decision.<sup>2</sup> Those efforts were not successful. On January 24th, 2020, just one month after the initial announcement, the OMB officially approved recommendations to close NAS.

Efforts to reverse the decision have continued. The State Attorney General Bob Ferguson was quick to announce his office was reviewing the legality of the decision and issued an ultimatum threatening a lawsuit on the basis of several departures from the law. They include Executive Order 13175 which requires agencies to seek input from tribal officials before making decisions that would impact Native Americans, and to provide detailed plans and yearly progress reports on how each agency is complying with the order.<sup>3, 4</sup> Ferguson listed several additional issues in the Public Buildings Reform Board's (PBRB) report, including the fact that the committee neglected to work with the GSA as required to develop standards and criteria for evaluating properties, the absence of an explanation for how data about NAS was collected and evaluated, and lack of input from local public officials on the impact the sale of the building would have on their constituents.<sup>5</sup> Ferguson continues, stating the decision to "wholly ignore the impact that removing tribal records from the region would have on tribes located in the Pacific Northwest is inexcusable and unacceptable."<sup>6</sup> After meeting with NARA officials about a month after issuing the ultimatum, Ferguson proposed a compromise that would allow a selection of the region's most important historical records to stay in Washington, perhaps at the Washington State Archives in Olympia, along with a request for federal funding for operating and remodeling the facility.<sup>7</sup> That development came on the heels of the COVID-19 pandemic which complicates matters and raises questions of whether there will be time, public pressure, or funds to move the archives to the Olympia location. As it stands, NAS is operating business as usual until the building in which NAS operates is sold in the next one to three years.

2. Letter to Office of Management and Budget Acting Director Russ Vought regarding Seattle Archives, signed by US Senators and Representatives, January 24, 2020, <https://www.cantwell.senate.gov/imo/media/doc/Letter%20to%20OMB%20Director%20Vought%20re%20Seattle%20Archives.pdf>.
3. Executive Order No. 13175, "Consultation and Coordination with Indian Tribal Governments," November 6, 2000, <https://www.federalregister.gov/documents/2000/11/09/00-29003/consultation-and-coordination-with-indian-tribal-governments>.
4. The White House, "Presidential Memorandum on Tribal Consultation," November 5, 2009, <https://obamawhitehouse.archives.gov/the-press-office/memorandum-tribal-consultation-signed-president>.
5. Bob Ferguson, "Ltr from AG Ferguson Re Seattle Archives," February 25, 2020, <https://www.scribd.com/document/449015024/Ltr-From-AG-Ferguson-Re-Seattle-Archives>, 7.
6. Ferguson, "Ltr from AG Ferguson," 5.
7. Feliks Banel, "State AG Ferguson Seeks Compromise on Seattle National Archives Closure," *MyNorthwest*, March 24, 2020, <https://mynorthwest.com/1784267/ferguson-national-archives-closure-compromise/>.

In attempting to understand the decision, a number of questions arise: how was the decision to close NAS made? Who was involved in the decision? How to understand what the loss of the archives would mean for the Pacific Northwest (PNW) region: who would be impacted, and in what ways? As this is a current and evolving issue, what would happen to the records going forward? Informing this research are the PBRB final recommendation report and NARA's yearly budgets which shed light on the decision-making process. News articles reveal the reactions of the local community and timeline of events. Physical closure of the NAS facility due to the COVID-19 outbreak was a challenge to this research and made requesting and conducting interviews more difficult. While unable to speak about the decision to close the building, NAS staff provided their perspectives on NAS history and collections, their work at the archives, and the archival profession. Staff requested to remain unnamed.

In this paper, the justifications for recommending the facility be closed are analyzed within the context of the history of the land the NAS building occupies. First, the major collections in NAS and a brief history of the land is described. The PBRB's process for making its recommendation is analyzed with a focus on the problematic use of accounting and utilization standards. NARA's role in the process is considered in light of its obligations to advocate for the archives and to ensure equitable access to public records. The closing of the National Archives at Anchorage in Alaska offers a basis for comparison to the situation in Seattle which sheds light on the potential impacts of this decision on Seattle researchers.

Closing NAS without consulting the public or considering the historical importance of the records held by the NAS is especially harmful for the communities who use NAS records for knowledge about their history. The decision to close NAS is a result of failure at multiple levels of government—from federal policymakers, to the PBRB, to NARA—to ensure people are able to access public archival records fairly and equitably. Deemed a fourth pillar of public administration, the National Academy of Public Administration (NAPA) Standing Panel on Social Equity in Governance defines social equity as “the fair, just and equitable management of all institutions serving the public directly or by contract, and the fair and equitable distribution of public services, and implementation of public policy, and the commitment to promote fairness, justice, and equity in the formation of public policy.”<sup>8</sup> Discussions of social equity in public administration began in the 1960s when social unrest led to a wider recognition among public administration researchers and practitioners that American policy disadvantaged some groups more than others.<sup>9</sup> In reviewing the process for

8. Tyrone P. Dooley, “Searching for Social Equity Among Public Administration Mission Statements,” *Teaching Public Administration* 38, no. 2 (July 2020): 113-125, <https://doi.org/10.1177/0144739419867121> (full article at <https://www.napawash.org/standing-panel-blog/social-equity-resources>).

9. Susan Gooden and Shannon Portillo, “Advancing Social Equity in the Minnowbrook Tradition,” *Journal of Public Administration Research and Theory* 21, supplement 1 (January 2011): 161-176, <https://doi.org/10.1093/jopart/muqo67>.

how the decision to close NAS was made, it is clear that social equity was not prioritized, if considered at all, as a factor in the decision-making process. The neglect on the part of the PBRB to consider the value of the archives to marginalized communities and the failure of NARA to communicate that value led to a decision that will make access to the archives more difficult for the entire region.

## About NAS

NAS is located in the Seattle Federal Records Center, or FRC, in the Sand Point neighborhood of Seattle. Originally a naval warehouse during World War II, FRC was converted in the 1960s to hold national archival records.<sup>10</sup> Today, the 73-year-old facility holds one million cubic feet of federal records, over 58,000 cubic feet of which are permanent archival records from federal agencies in the PNW and cannot be destroyed.<sup>11</sup> Some of the most requested documents include those related to the U.S. District Courts, the Bureau of Indian Affairs, Forest Service, Bureau of Land Management, U.S. Army Corps of Engineers and the U.S. Coast Guard.<sup>12</sup> The records held at the FRC are used by state, city, and municipal agencies, making this facility an important resource for a variety of stakeholders in the PNW including government agencies, businesses, law practices, research institutions and universities, as well as the public, who rely on the records for their research.

Tribes are especially interested in NAS remaining in Seattle, as the facility contains important treaty and census documents relating to the 272 federally recognized tribes in Washington, Oregon, Idaho, and Alaska—the state with the highest concentration of Native People in the country.<sup>13</sup> Bureau of Indian Affairs records created by Indian agencies in Idaho, Oregon, Alaska, and Washington represent a significant portion of the archival space, taking up more than 6,600 cubic feet alone.<sup>14</sup> The tribes rely on these records to demonstrate their tribal rights, enforce treaties, and trace their ancestry using documents from Native schools and allotment records.<sup>15, 16</sup> A particularly important collection is the Boldt Decision of

10. Feliks Banel, "Officials, Historians Slam 'Horrendous' Plan to Close Seattle National Archives," *MyNorthwest*, January 22, 2020, <https://mynorthwest.com/1680107/officials-historians-seattle-national-archives-closure-horrendous/>.

11. Personal communication with staff member 3, June 24, 2020.

12. Personal communication with staff member 1, February 14, 2020.

13. Erik Lacitis, "Frustrated': Tribes Finally Get Hearing With National Archives About Sand Point Facility Closure," *The Seattle Times*, February 11, 2020, <https://www.seattletimes.com/seattle-news/frustrated-tribes-finally-get-hearing-with-national-archives-about-sand-point-facility-closure/>.

14. Interview with staff member 1, February 14, 2020.

15. Ferguson, "Ltr from AG Ferguson."

16. Interview with staff member 1, February 14, 2020.

1973, a landmark case which upheld the Treaty of Point Elliot signed in 1855 and which affirmed the rights of Native People to make a living off of fishing and to protect waterways in the State.<sup>17</sup> Because many aspects of this case are still open in the Western District of Washington Court, the NAS has yet to receive the case. The alternative for legal researchers is NAS' more than 21 cubic feet of the Boldt Decision Litigation Background Files covering years 1974 through 1978 received from the U.S. Fish and Wildlife Service.<sup>18</sup> These files are useful for court cases related to the Boldt Decision today. In 2018, for example, Washington State was ordered to fund reconstruction of culverts along the Columbia River which have blocked Salmon runs to the Pacific Ocean.<sup>19</sup> This case was won in part due to the precedent set by the Boldt Decision.

Among other frequent researchers at the NAS is a historian with a passion for researching shipping vessels in the Puget Sound during World War II; another is a writer who uses the archives to learn what it was like in the 1900s Pacific Northwest to give authenticity to her murder-mystery book series set in that time period.<sup>20</sup> Judging by web presence alone, the archives are well-used. The Facebook page for the Seattle Archives in the past five years has several community posts sharing resources for research projects such as Seattle's LGBTQ bar scene, naturalization records, and ancestry.<sup>21</sup> Community members also post about research successes, pass along opportunities for learning and workshops, and share findings from history projects.<sup>22</sup> The Seattle archives contributed heavily to the 150th Anniversary of the Alaskan Purchase, providing 150 images to a Flickr page culled from the Alaska Digitization Project.<sup>23</sup> The images are digitized versions of maps, diagrams, photographs, and art featuring wildlife, Native Alaskan art, and landscapes, among other images of Alaskan culture and history. Each of these projects relies in whole or in part on the records held at NAS and makes the near-certain loss of the archives that much more painful to local communities.

Seattle's immigrant and Indigenous communities have been vocal in their opposition to the decision to close the NAS as the facility houses records crucial to

17. Ibid.

18. Ibid.

19. John Eligon, "This Ruling Gives Us Hope': Supreme Court Sides with Tribe in Salmon Case," *The New York Times*, June 11, 2018, <https://www.nytimes.com/2018/06/11/us/washington-salmon-culverts-supreme-court.html>.

20. Interview with staff member 1, February 14, 2020.

21. National Archives at Seattle (Facebook community page), <https://www.facebook.com/nationalarchivesseattle>.

22. Ibid.

23. The U.S. National Archives, "150th Anniversary" (Flickr album page), <https://www.flickr.com/photos/usnationalarchives/sets/72157681637406605>.

understanding and uncovering their communities' pasts. Included in the Seattle archives are records of the Chinese Exclusion Act, which registered Chinese immigrants to the United States. Access to the roughly 50,000 case files, including photographs and transcripts of interrogations conducted at the time of entry, are critical to researchers of the Chinese experience in the Pacific Northwest and tracking family history, in some cases back to the village whence an ancestor came.<sup>24</sup> Records of the internment of Japanese Americans during World War II are contained in NAS as well, which helps researchers and family historians understand the impact of forcible removal and incarceration of Japanese Americans during this time. Removing these records from the PNW would impede the ability of descendants of immigrants to learn about and discover family history and genealogy.<sup>25</sup>

This decision strikes particularly hard for Native People. The records at NAS are more than inert paperwork, they connect Native People with their ancestors and history. The ability to handle the government documents of their history and see the signatures of their ancestors in person is irreplaceable by digital technology.<sup>26</sup> At a protest outside the NAS, a member of the Wyam tribe of Celilo Falls, which is unrecognized by the federal government, called the decision to remove the documents that affirm her right to exist a "paper genocide."<sup>27</sup> The records contained in NAS have special importance to the local community. NAS collections are priceless resources housed within a building on a tract of land with a complex and painful history for people of color and marginalized communities. The history of the land itself highlights the ways in which the PBRB's decision fails to address the communities' concerns.

## Land Value and the NAS

The PBRB recommended Seattle's Federal Records Center (FRC) be sold based on an equation that grants a veneer of objectivity to the decision. PBRB Executive Director Adam Bodner explained the PBRB "proposed that property [NAS] to NARA... as a potential because it appeared to be underutilized, and it's in a[n] area where the

24. Lisa Peet, "Seattle National Archives Threatened with Closure," *Library Journal*, March 4, 2020, <https://www.libraryjournal.com/?detailStory=seattle-national-archives-threatened-with-closure>;  
Chetanya Robinson, "Concerns Raised About Closure of National Archives in Seattle, which contains Chinese Exclusion Act Records," *International Examiner*, February 4, 2020, <https://iexaminer.org/concerns-raised-about-closure-of-national-archives-in-seattle-which-contains-chinese-exclusion-act-records/>.
25. Robinson, "Concerns Raised About Closure of National Archives in Seattle."
26. Interview with staff member 2, February 14, 2020.
27. Knute Berger, "Closing Seattle's National Archives is a 'Paper Genocide' for Some Natives," *Crosscut*, February 21, 2020, <https://crosscut.com/2020/02/closing-seattles-national-archives-paper-genocide-some-natives>.

property itself would be very valuable.”<sup>28</sup> According to the PBRB’s final report, the yearly cost of operating and maintaining the FRC was higher than the profit would be if the land was sold. Not only does this formula ignore an important variable—the value of the archives—the PBRB’s focus on the financial position of the facility ignores the history of the land the FRC occupies. That the PBRB uncritically used the real estate market in a well-off, majority white neighborhood in Seattle as the primary factor in deciding whether the FRC should be sold is a continuation of the same practices that led to the land the FRC sits on being government-owned in the first place—colonization, internment, racial restrictive covenants, and redlining paved the way for white communities to benefit from the current real estate market while Black, Indigenous, and people of color were systematically excluded from building wealth and capital through land and home ownership for decades. The impact of racist and discriminatory land and mortgage practices echoes through the present day.

Seattle sits on Duwamish land, a 600 years-old tribe that is still not federally recognized. In 2009, a federal judge denied the Duwamish their request for recognition “primarily because of what officials said was a lapse in tribal government and social cohesion from 1916 to 1925.”<sup>29</sup> The City of Seattle Board of Trustees passed an Ordinance in 1865 which prohibited Indigenous People from living within the city.<sup>30</sup> This, and the construction of a ship canal in 1916 between Lake Washington and the Puget Sound, forced the Duwamish into reservations such as Muckleshoot to the South and Tulalip to the North.<sup>31</sup> City ordinances and city planning not only cleared the way for white property owners to own, build on, and reap the rewards of stolen land, these policies created the conditions by which the Duwamish people can be denied tribal recognition. NAS houses the records that document some of this history.

Alien land laws also prevented immigrants from owning land and property in the U.S. The land the FRC sits on was a farm cultivated since 1910 by the Japanese Uyeji family who, along with their Japanese-American neighbors, were removed to the Tule

28. Feliks Banel, “Feds Play Blame Game While Closure of Seattle National Archives Moves Ahead,” *MyNorthwest*, January 27, 2020, <https://mynorthwest.com/1688657/seattle-national-archives-feds-blame-game/>.

29. Chris Grygiel, “Duwamish Tribe Tries for Federal Recognition – Again,” *Seattle PI*, July 14, 2009, <https://www.seattlepi.com/local/article/Duwamish-tribe-tries-for-federal-recognition-1305112.php>; for a broader critique of the recognition process see: Maria Montenegro, “Unsettling Evidence: An Anticolonial Archival Approach/Reproach to Federal Recognition,” *Archival Science* 19, no. 2 (2019): 117-140, <https://doi.org/10.1007/s10502-019-09309-9>.

30. Seattle Planning Commission, “Evolving Seattle’s Growth Strategy,” Winter 2020, [https://www.seattle.gov/Documents/Departments/SeattlePlanningCommission/SPC%20Growth%20Strategy%20White%20Paper%201072020\(0\).pdf](https://www.seattle.gov/Documents/Departments/SeattlePlanningCommission/SPC%20Growth%20Strategy%20White%20Paper%201072020(0).pdf), 5.

31. Grygiel, “Duwamish Tribe Tries for Federal Recognition – Again.”



Lake internment camp in 1942.<sup>32</sup> While the family was interned, the land was seized, condemned, and sold to the Navy in 1945 and used as a warehouse until the building was converted for NARA in 1963. The Uyeji family did not return to Seattle.

Seattle's history is further stamped in the deeds of thousands of homes. From 1923 through 1950, housing developers added racial restrictions to deed provisions or restrictive covenants to ensure a neighborhood remained white and to explicitly exclude people of color from living in that area.<sup>33</sup> In the Hawthorne Hills subdivision, the suburban area surrounding the FRC, at least 520 properties explicitly excluded anyone except white people to buy, rent, or even occupy, properties.<sup>34</sup> The Supreme Court may have made racial restrictions in housing unenforceable in 1948, but it was the practice of redlining brought about by the National Housing Act of 1934 that deepened and entrenched housing patterns that can be seen to this day in Seattle. Redlining was a common practice in which certain neighborhoods "were considered risky for mortgage support and lenders were discouraged from financing property in those areas," a practice which prevented many non-white people from accessing credit, taking out mortgages, and building wealth.<sup>35</sup> As a result, for much of Seattle's history, "people of color had little chance of finding housing except in the central neighborhoods of Seattle" such as the Central District and the International District.<sup>36</sup> Decades later, racial divisions are deeply etched into Seattle's neighborhoods.

The past twenty years have brought economic prosperity to the Seattle region. Strong technology, manufacturing, and software sectors have attracted workers from across the country such that the city population has grown by about 22 percent since 2010.<sup>37</sup> Seattle has had one of the fastest growing economies in the nation for many years.<sup>38</sup> But this growth comes at a cost to many of the cities' marginalized people who are disproportionately burdened with inflated rents and higher costs of living. According to the 2016 Displacement Risk Index, Seattle's historically redlined

32. Ferguson, "Ltr from AG Ferguson."

33. Seattle Civil Rights and Labor History Project, "Racial Restrictive Covenants: Neighborhood by Neighborhood Restrictions Across King County," accessed October 2020, <https://depts.washington.edu/civilr/covenants.htm>.

34. Ibid.

35. Catherine Silva, "Racial Restrictive Covenants History: Enforcing Neighborhood Segregation in Seattle," 2009, accessed October 2020, [https://depts.washington.edu/civilr/covenants\\_report.htm](https://depts.washington.edu/civilr/covenants_report.htm).

36. Seattle Civil Rights and Labor History Project, "Racial Restrictive Covenants."

37. Michael Goldman, "2019 Population Estimates Have Seattle Pushing 750,000 With Steady Growth," *The Urbanist*, July 1, 2019, <https://www.theurbanist.org/2019/07/01/seattle-pushing-750000-with-steady-growth/>.

38. Bill Conroy, "Seattle Ranks as One of the 'Top Boomtowns' in the Country Among Large Cities," *Seattle Business Magazine*, December 5, 2019, <https://www.seattlebusinessmag.com/economy/seattle-ranks-one-top-boomtowns-country-among-large-cities>.

neighborhoods are at high risk of gentrification, pushing people of color out of the neighborhoods to which they were once consigned.<sup>39</sup> For example, a study of the Central District, historically one of the only places people of color could live, showed that in 1990 “there were nearly three times as many black as white residents in the area, but by 2000, the number of white residents surpassed the number of blacks for the first time in 30 years.”<sup>40</sup> Seattle continues to see stark racial inequities in homeownership, employment, education, and health outcomes as a result of discriminatory housing policies practiced up until the recent past, when the Fair Housing Act of 1968 created consequences for using national origin, sex, or race in mortgage lending decisions.<sup>41</sup> White people reserved the Hawthorne Hills neighborhood for white homeowners, and as home values increased, so did their wealth. In 2019, according to Redfin, the average sale price for a home in this neighborhood was \$1.4 million in a very competitive market.<sup>42</sup> The strength of the housing market in this area should not overshadow how that success was come by: decades of enacting and enforcing racist laws and financial practices that excluded all but white people from securing power.

It is impossible to consider the history of this building without acknowledging the racist systems created and used by white people to gain an advantage. The land on which the FRC rests is indeed very valuable. But the value of that land cannot be understood in a vacuum. It cannot be extracted from the historical context which shaped the social conditions in which today’s Seattle residents live. As much as land value or the real estate market may seem like an objective or neutral metric by which to determine the fate of a large portion of the nation’s archives, it is not, as evidenced by the history of that plot of land. The collections within the NAS tell the unique history of the people in this region and should remain in the Pacific Northwest.

Understanding the history of the land the FRC sits on provides a backdrop which brings the PBRB’s lack of consideration for the disproportionate impact of this decision on the region’s historically marginalized communities into stark relief. The history of the land reveals the difficulty in ensuring a fair outcome to a decision based on real estate values, especially of a resource as important as the NAS, but real estate rates were not the only factor used in determining the building’s fate. As social equity

39. Seattle Office of Planning & Community Development, “Seattle 2035 Growth and Equity: Analyzing Impacts on Displacement and Opportunity Related to Seattle’s Growth Strategy,” May 2016, <https://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/SeattlesComprehensivePlan/FinalGrowthandEquityAnalysis.pdf>.
40. Seattle Office of Planning & Community Development, “Seattle 2035 Growth and Equity,” 6.
41. Gene Balk, “Seattle Schools Have Biggest White-Black Achievement Gap in State,” *Seattle Times*, May 9, 2016, <https://www.seattletimes.com/seattle-news/data/seattle-schools-have-biggest-white-black-achievement-gap-in-state/>; Seattle Planning Commission, “Evolving Seattle’s Growth Strategy,” 3.
42. Redfin, “Hawthorne Hills Housing Market: Market Insights,” accessed October 2020, <https://www.redfin.com/neighborhood/9353/WA/Seattle/Hawthorne-Hills/housing-market>.

was hardly considered in this decision, efficiency was overly emphasized. Profitability and utilization rates as proxies for efficiency is an approach in national policy designed to reduce staffing and squeeze productivity out of every inch of federally owned and managed space. To understand how and why the NAS came to be a target for closure, the legal basis of the creation of the PBRB and the major justifications the PBRB gives for making their decision, which we examine next, raise additional concerns for how public services are analyzed and assessed in the context of national policies which prize agency efficiency above all else.

## The PBRB's Decision

In 2015, the Office of Management and Budget (OMB) released two sets of policies regarding federal real property. The National Strategy for the Efficient Use of Real Property provides a framework to improve the federal government's real property management by halting acquisition of property and reducing the size of the inventory, and the Reduce the Footprint (RTF) Policy was written to improve government efficiency by reducing the total square footage of office and warehouse space.<sup>43</sup> Lastly, in 2016, the Federal Asset Sales and Transfer Act (FASTA) was passed into law, which created a committee called the Public Buildings Reform Board (PBRB). The committee consists of five members tasked with identifying underutilized federal buildings, or High Value Assets (HVAs), that would be eligible to bypass the usual, more cumbersome, asset disposition process and be fast-tracked for sale to "significantly reduce [the federal government's] inventory of civilian real property and thereby reduce costs" of running the federal government.<sup>44</sup> The importance of space efficiency is evidenced by the experience required of members selected for the committee: commercial real estate and redevelopment, space optimization and utilization, or community development transportation and planning.<sup>45</sup> The PBRB was tasked with developing standards by which to assess properties including an accounting system to analyze the costs and returns of selling the facility, a system to calculate space utilization rates, and evaluating how the ability of the public to access services would be impacted by the closure of the facility.<sup>46</sup> Several of the PBRB's stated reasons for choosing to add the NAS to their list of recommended closings have been heavily criticized. Reporting from news

43. "The National Strategy for the Efficient Use Of Real Property and the Reduce The Footprint (RTF) Policy," U.S. General Services Administration, January 29, 2018, accessed October 2020, <https://www.gsa.gov/policy-regulations/policy/real-property-policy/asset-management/the-national-strategy-for-the-efficient-use-of-real-property-and-the-reduce-the-footprint-rtf-policy>.

44. "Home," Public Buildings Reform Board, accessed October 2020, <https://www.pbrb.gov/>.

45. Federal Assets Sale Transfer Act of 2016, Public Law 114-287, 130 Stat. 1463, December 16, 2016, <https://www.congress.gov/114/plaws/publ287/PLAW-114publ287.pdf>; Ferguson, "Ltr from AG Ferguson," 7.

46. Public Buildings Reform Board, "High Value Assets Report as Required by FASTA," December 27, 2019, <https://www.pbrb.gov/assets/uploads/20191227%20High%20Value%20Assets%20Report%20as%20Required%20by%20FASTA.pdf>.

outlets and letters sent to the PBRB by local government offices call into question the PBRB's argument that NAS sufficiently meets any of these criteria, discussed in turn.

First, the PBRB was to develop a standard accounting system to analyze the financial position of each HVA. As discussed earlier, the PBRB's decision to recommend the FRC be sold was based in part on the annual cost of operating the facility compared to real estate values of the local area. The PBRB used real estate market-wide data, market rent data, and estimates from real estate experts to assess the sale price of the NAS,<sup>47</sup> and determined that selling the ten-acre plot of land would bring a profit if sold to residential property developers.<sup>48</sup> The potential profits from selling the Seattle facility to developers and the removal of both the \$2.4 million maintenance backlog and approximately \$357,000 in annual operating costs from NARA's yearly budget made NAS an attractive addition to PBRB's list and an easy way for NARA to balance a tight budget.<sup>49</sup> However, as noted by Washington State's Congresspeople and Representatives, the PBRB neglects to account for a number of financial aspects of their recommendation to close the facility. Murkowski succinctly sums up the report's deficiencies in financial reasoning, noting the report does not explain:

how much funding NARA will need to transport the records to the California and Missouri facilities. There is also no explanation of how much it will cost for NARA to renovate its facility in Riverside, California to house the records from the Seattle facility. The PBRB also does not estimate how much the short-term occupancy agreement will cost as NARA prepares the alternative facilities to receive the records, pack them, and re-locate them.<sup>50</sup>

Additionally, regarding the building's maintenance backlog, one staff member explains FRC needs upgrades to the system that maintains the correct temperature required to preserve the records but recalls working at other NARA facilities known to incur expensive operating and maintenance costs.<sup>51</sup> This raises the question of how and why the Seattle location was targeted for closure over other NARA facilities with similar or more extensive problems. The PBRB argues in their report that the land the NAS occupies could bring a profit if sold to developers, but considering the unacknowledged costs associated with closing, moving, renovating, and relocating the records to Missouri and California, the PBRB has failed to demonstrate that the sale of the facility will result in a profit or reduce the federal deficit as the Board is required to do. The Board's analysis of the use of space within NAS is another

47. Public Buildings Reform Board, "High Value Assets Report," 11.

48. Public Buildings Reform Board, "High Value Assets Report," A-68.

49. Public Buildings Reform Board, "High Value Assets Report," A-69.

50. Letter to Office of Management and Budget Acting Director, January 24, 2020, para. 3.

51. Interview with staff member 1, February 14, 2020.

problematic aspect of the addition of NAS to the list of recommended building closures.

Utilization rates are calculated as the square footage of a building divided by the number of employees working in that building and its simplicity in expression belies its complexity in application. The ratio is meant to be used to determine whether a facility is used efficiently. Theoretically, disposing of federal properties that are inefficient decreases the “footprint” of the federal government and therefore costs to the taxpayer. The PBRB’s calculation of utilization rates as a measure of efficiency with regard to the NAS facility has several flaws, including inconsistent data reporting, unclear application of the standard to the NAS, and the appropriateness of such a metric to a profession such as archiving.

The first issue with utilization rates is the accuracy of the data used. The PBRB used the 2018 Federal Real Property Profile (FRPP) as the primary source of data to identify federally owned real property for disposal. The database, created in 2004, collects data about each federally owned, leased, or controlled property in or outside the U.S.<sup>52</sup> The 2018 FRPP Data Dictionary defines three categories of utilization: unutilized, underutilized, or utilized.<sup>53</sup> As the PBRB report states, the Data Dictionary offers no guidance on how to determine which category an asset belongs to.<sup>54</sup> Each agency is advised to calculate “utilization based on the programmatic purpose for which the asset is used”, or, the mission of each agency.<sup>55</sup> This creates uncertainty in a process that the PBRB is expected to systematize. The PBRB report laments that “while OMB and GSA [General Services Administration] did develop utilization rate recommendations for office buildings, data in most buildings is currently inadequate to accurately track utilization.”<sup>56</sup> Determining an accurate headcount, for example, is difficult to derive, as questions such as whether to include contractors or seasonal workers may be handled differently from one agency to the next. Another complicating factor is whether square footage was reported in terms of gross square footage, which includes all physical space a building occupies, or total usable space, which subtracts space that is not usable by employees for work, such as an underground parking garage. To address this discrepancy, the PBRB created its own system for converting gross square footage of assets into total usable square footage. The PBRB applied a 15 percent negative adjustment to the FRC to arrive at an estimation of total square feet available for use by NAS staff. The adjustment seems arbitrary as the PBRB does not explain how the adjustment factor was determined let

52. Federal Real Property Council, “2018 Guidance for Real Property Inventory Reporting,” June 12, 2018, <https://www.gsa.gov/cdnstatic/FY%202018%20FRPP%20DATA%20DICTIONARY%20ofinal.pdf>, 4.

53. Federal Real Property Council, “2018 Guidance for Real Property Inventory Reporting,” 20.

54. Public Buildings Reform Board, “High Value Assets Report,” C-2.

55. Federal Real Property Council, “2018 Guidance for Real Property Inventory Reporting,” 20.

56. Public Buildings Reform Board, “High Value Assets Report,” 10.

alone whether it was standard industry practice to do so. The workspace available to staff is in reality far less than 85 percent of the warehouse.

Besides the inconsistencies in data received from reporting agencies, complications in using utilization rates are further compounded by the nature and mission of archival institutions. As the PBRB report notes, “utilization analysis is often focused on office properties because that is where most Government employees perform work.”<sup>57</sup> In many other agencies, utilization rates might accurately reflect how space is used, but most corporate and government office workers use workstations at desks in cubicles, offices, and conference rooms to complete their work. In archiving, space and its use are less straightforward. NARA collects permanent records from government agencies including the White House, Congress, and Federal agencies in a variety of formats. While NARA has worked since 2008 to use the Electronic Records Archives (ERA) system to move government recordkeeping into a digital environment, most agencies lag far behind in adopting electronic recordkeeping practices.<sup>58</sup> Nationally, NARA received over 12,000 transfer requests for textual records in 2016 alone that must be processed through ERA by NARA staff.<sup>59</sup> In Seattle alone, NAS collected around 1,300 cubic feet of government documents in 2019 and was on track to bring in a similar amount this year, complications from the pandemic aside.<sup>60</sup> The amount of space is necessary—in fact, the facility only has “a bit of room” to continue collecting documents for the next few years.<sup>61</sup> The 58,000 cubic feet of records stored on 14-foot-tall shelving units take up a majority of available space in NAS.<sup>62</sup> NAS staff complete their day-to-day tasks in far less than the total building space—although they need access to the stored records to serve their patrons. Yet, the PBRB claimed the NAS was underutilized.<sup>63</sup> In an attempt to recreate how this determination was made, one might visit the NAS and see that even if the 22 employees completed their regular work in a 5,000 total square foot space (well above the usable office space available to NAS employees), the utilization rate would be about 227 square feet per person. By the PBRB’s own definition, a potentially inefficient use of space is defined as more than 425 usable square feet per person.<sup>64</sup> It is unclear from the report what data was used by the PBRB to conclude

57. Public Buildings Reform Board, “High Value Assets Report,” C-5.

58. Interview with staff member 2, February 14, 2020.

59. “About ERA,” National Archives and Records Administration, accessed October 2020, <https://www.archives.gov/era/about>.

60. Interview with staff member 3, June 4, 2020.

61. Interview with staff member 3, June 4, 2020.

62. Interview with staff member 3, June 24, 2020.

63. Banel, “Feds Play Blame Game.”

64. Public Buildings Reform Board, “High Value Assets Report,” C-3.

the NAS was underutilized—one of the main reasons the Board cites as the reason the FRC came to their attention in the first place. As reported by the PBRB, the data do not allow for the unique needs of the agency to which these standards are applied.

As a benchmarking tool, a utilization rate can provide helpful information about whether space is being used efficiently, but there are limits to what that information says about the agency over time. The NAS workforce has decreased by at least one or two employees since the 1990s while holdings have grown and the size of the building has of course remained the same.<sup>65</sup> On paper, the agency appears to have reduced efficiency over time simply because square footage per employee has increased. Calculating utilization rates in this way says nothing of NAS' contributions to research projects, the numbers of questions answered, or the volume of documents scanned, digitized, and delivered. The only reference to mission fulfillment mentioned in the PBRB final report notes that "NARA has determined that it can fulfill its mission needs at the target relocation facilities."<sup>66</sup> There is no supporting information for how the PBRB came to determine or accept this conclusion. NARA's efficiency should be measured by agencies' adherence to and successful support of their missions and goals. A one-size-fits-all formula applied across agencies with vastly different missions and space requirements inaccurately represents the work of federal agencies—especially those with warehousing and storage as their main operational function.

Discussions with NAS staff paint a different picture about how well the Seattle facility is used and are drawn from data about visitors to the facility rather than space. At least one or two people are present in the research rooms any given weekday, and the rooms are packed several days per week.<sup>67</sup> With 12 seats available before the pandemic closed research rooms, that is a significant level of foot traffic. From fiscal year October 2018 to September 2019, 712 people visited NAS to use original records—busy, according to NAS staff present when the Alaska archives were moved from Seattle to Anchorage in December of 1990 and when they made the return journey back to Seattle in 2014.<sup>68</sup> Comparatively, the Alaska National Archives had 223 users in fiscal year 2013 and for several days during the winter months, there were no visitors to the Anchorage research rooms.<sup>69</sup> The decision to close the archives in Alaska was justified in large part by very low foot traffic and cost. Asked about the community's reaction to the news that the Alaska records would be moved back to Seattle, records show that in the five months before the announcement was made, 112 researchers used the facility; this jumped to over 300 visitors in the four

65. Interview with staff member 3, June 4, 2020.

66. Public Buildings Reform Board, "High Value Assets Report," A-69.

67. Interview with staff member 1, February 14, 2020.

68. Interview with staff member 3, March 6, 2020.

69. Interview with staff member 3, June 4, 2020.

months before the facility was closed, still less than half the amount of visitors to NAS in one year.<sup>70</sup> In addition to accounting and utilization, the PBRB was required to consider how public access to agency services is maintained or enhanced by the recommendation to sell the NAS. From the reactions of community leaders and stakeholders, it is clear that the PBRB did not do its due diligence in making that assessment.

The PBRB report claims that the Board reached out to Congressional representatives prior to recommending an HVA for sale.<sup>71</sup> Seattle City Councilmember Alex Pedersen did not receive any such notification and spokesperson for Congresswoman Pramila Jayapal explained that while the PBRB had contacted her office, the PBRB told her that public opinion would be sought before a final decision was made.<sup>72</sup> This never occurred. According to the PBRB's website and final report, public meetings were conducted in four cities across the U.S., none of which were in the PNW.<sup>73</sup> Sand Point neighborhood residents were not consulted for their input in how that land should be used. According to Executive Order 13175 (2000), government agencies must consult with tribes when developing policies that affect them.<sup>74</sup> This did not occur, either. Chairmen of the Port Gamble S'Klallam Tribe and Puyallup Tribe of Indians stated in letters to the OMB that they were not contacted at all.<sup>75</sup> To add insult to injury, NARA executives met with tribal leaders at NAS, but the invitation came on short notice and was timed when many leaders were in D.C. for the National Congress of American Indians.<sup>76</sup> Tribal leaders feel that their perspectives were completely ignored throughout this process and have lost trust in the agency as a result.<sup>77</sup> The PBRB report all but admits to insufficient communication with local officials: "while time constraints limited the number of offices contacted about individual properties, collaboration and transparency between the PBRB and Congressional Representatives informed the PBRB's decisions on *many* [emphasis added] of the property candidates."<sup>78</sup> In an interview, PBRB

70. Interview with staff member 3, June 4, 2020.

71. Public Buildings Reform Board, "High Value Assets Report."

72. Banel, "Feds Play Blame Game."

73. Public Buildings Reform Board, "High Value Assets Report," 4.

74. Executive Order No. 13175, "Consultation and Coordination with Indian Tribal Governments."

75. Letters to Office of Management and Budget Acting Director Russell Vought from the Puyallup Tribe Chairman David Z. Bean and Port Gamble S'Klallam Tribe Chairman Jeremy Sullivan, January 2020, <https://www.documentcloud.org/documents/6671516-National-Archives-Puyallup-and-Port-Gamble.html>.

76. Banel, "Feds Play Blame Game."

77. Ibid.

78. Public Buildings Reform Board, "High Value Assets Report," 4.



member and government contracts lawyer Amanda Styles said the PBRB was “not required by statute to seek public input first.”<sup>79</sup> This claim is disputed by Washington State Attorney General Bob Ferguson, and the text of the law itself: “(f) Public Hearing.—The Board shall conduct public hearings.”<sup>80</sup> The PBRB failed to reach out to the local community and stakeholders as required by law, instead taking at face value NARA’s claim that access to services would be maintained through digitization of the NAS records at the facilities in Missouri and California.

After the PBRB submits their recommendations to the OMB, the OMB has final authority on whether the HVAs will be sold. Once approved, the list is sent to Congress, and the PBRB works with the GSA to begin the process of carrying out the PBRB’s recommendations, including closure, consolidation, or sale of the facility. Despite the many flaws in the PBRB’s review process including incomplete accounting, inaccurate data, the dubious usefulness of utilization rates for archival facilities, and the lack of public process, the deal is done. There is no appeals process within the FASTA (2016) law, the purpose of which, after all, was to streamline the otherwise bureaucratic process of selling federal property. Communications with local officials, public hearings, and other considerations are assumed to have been completed by the PBRB before final recommendations are made. Sound budgeting, accurate data, and open and transparent public hearings are some of many mechanisms that government agencies employ to ensure efficiency, hold government accountable, and uphold public trust. These tools were not properly employed by the PBRB, nor are any of the committee members archivists. The value of the facilities may not be immediately apparent to them; it should be to NARA. The role that NARA has played in this process, including NARA’s handling of the announcement and the agency’s assurances that digitizing records will alleviate the loss of physical access to NAS records, is concerning for those whose records are entrusted to the agency’s care and frustrating for those knowledgeable of the realities of archiving.

## NARA’s Role

A number of missteps from NARA has led to distrust of the agency among researchers, community members, and other users of the NAS records. The lack of communication from NARA about the plans for the archives has left many in doubt of NARA leadership and State officials scrambling for solutions to keep the archives local. The unwillingness of NARA to advocate for the Seattle facility to remain in the PNW and lack of transparency about the process have frustrated those in the region who rely on access to the archives. From an archival practice standpoint, there are

79. Erik Lacitis, “‘Terrible and Disgusting’: Decision to Close National Archives at Seattle a Blow to Tribes, Historians in 4 States,” *The Seattle Times*, January 25, 2020, <https://www.seattletimes.com/seattle-news/terrible-and-disgusting-decision-to-close-national-archives-at-seattle-a-blow-to-tribes-historians-in-4-states/>.

80. Federal Assets Sale Transfer Act of 2016; Ferguson, “Ltr from AG Ferguson,” 7.

many concerns about the limitations of digitization, the logistics of relocating the records to other states, and the wisdom of removing them from the region in which they were created.

NARA's interactions with local media give the impression that NARA has been, if not active participants in the decision to close the Seattle location, at least more involved than the agency suggests. In an interview with *MyNorthwest*, Bodner stated the PBRB worked with the agency to add NAS to their list and that NARA "consented that they had the ability to relocate those files, or they felt that relocating those files was appropriate, and keeping them in the current facility, which is extremely in poor condition and expensive to operate and maintain, made good sense to them."<sup>81</sup> According to the PBRB report, NARA approved the decision, stating "the agency has indicated its willingness and desire to consolidate operations at more modern existing NARA facilities."<sup>82</sup> In attempting to understand why the agency would approve the decision, or why it seems NARA was disinclined to advocate to keep the FRC open, one potential explanation is the financial reality of the agency. NARA's budget has taken a particularly heavy hit over the last decade. In 2010, NARA's budget was \$467 million. By 2020, that number was reduced to \$358 million, a 25 percent reduction over ten years not accounting for inflation.<sup>83</sup> Budget hits have put a strain on NARA's resources and selling the Seattle facility would free up funds that could be used elsewhere. Additionally, the selection of the FRC through the expedited process under FASTA would relieve NARA of the responsibility of answering to the public for closing the facility, as the matter would in effect be out of that agency's hands. NARA seems to have played a part in the lack of public process as well, though NARA later declined to confirm the statement from Bodner that it was NARA that insisted on keeping the discussions between the agency and the Board quiet until one month before the OMB's approval of the selected HVAs for sale—when launching a sustained, organized, campaign against the decision would be much more difficult.<sup>84</sup>

NARA has attempted to assuage concerns about the loss of physical access to the archives with assurances that the records will be digitized. In the press release announcing the closure of NAS, NARA explained: "some of our most popular records have been digitized and are available online.... We are planning to expand our digitization efforts to make more records available free of charge and regardless of

81. Banel, "Feds Play Blame Game."

82. Public Buildings Reform Board, "High Value Assets Report," 68.

83. National Archives and Records Administration, "2010 Performance Budget—Congressional Justification," <https://www.archives.gov/files/about/plans-reports/performance-budget/2010/2010-performance-budget.pdf>, 1-1; National Archives and Records Administration, "FY 2020 Congressional Justification," March 11, 2019, <https://www.archives.gov/files/about/plans-reports/performance-budget/fy2020-performance-budget.pdf>, 2.

84. Banel, "Feds Play Blame Game"; Banel, "National Archives Tries 'Re-Set'."

location.”<sup>85</sup> This is in line with NARA’s first strategic goal: “Make Access Happen.”<sup>86</sup> Statements such as these are less reassuring for those who understand the time, money, and labor that go into digitizing records.

In 2014, when the National Archives in Anchorage, Alaska was closed, the Congressional Delegation of Alaska was promised by NARA that one hundred percent of the Alaska records would be digitized and that they would go no further than Seattle.<sup>87</sup> At the time, researchers in Alaska were concerned about their ability to access the records. According to staff who were working for NAS during this time, once the Alaska records were back on Seattle shelves, there was a huge influx of people requesting Alaskan records both in-person, over the phone, and through email—a demand that has sustained over time. While researchers in Alaska mourned the loss of physical access to their archives, “offsite research from Alaska is still strong” in part due to the systematic digitizing of those records that was negotiated by their political leaders.<sup>88</sup> Moving the state’s records to Seattle, though unpopular, seems to have been minimally disruptive to Alaska’s researchers and has made the records more accessible as the digitization efforts of NAS staff bring more documents online. Despite the success of the Alaska Digitization Project, the process of digitizing Alaska’s records is very far from completion.<sup>89</sup> Less than 1 percent of the 7,800 cubic feet of the Alaska National Archives have been completed since the project started in 2014, including documents that cannot be digitized.<sup>90</sup> For reference, a cubic foot box in which records are stored can hold up to 3,000 documents.<sup>91</sup> The volume of documents that staff must work through explains why, when discussing the progress made thus far, staff seem pleased. In almost any other field, calling a 1 percent completion rate after almost six years of work a snail’s pace would be an understatement. To an archivist, the pace “is pretty good considering the number of people (2-4) who have been assigned to work on [the Alaska Digitization Project]. But we’re nowhere near where interested people would like us to be.”<sup>92</sup> As for the rest of the archives held at NAS, less than 0.05% of the approximately 58,000 cubic feet of

85. National Archives and Records Administration, “Seattle Facility Approved for Closure,” January 27, 2020, <https://www.archives.gov/press/press-releases/2020/nr20-37#:~:text=Press%20Release%20%C2%B7%20Monday%2C%20January%2027%2C%202020&text=The%20National%20Archives%20and%20Records,for%20eventual%20closure%20and%20sale>.

86. “Mission, Vision and Values,” National Archives and Records Administration, accessed October 2020, <https://www.archives.gov/about/info/mission>.

87. Interview with staff member 2, February 14, 2020.

88. Interview with staff member 3, June 4, 2020

89. Interview with staff member 2, February 14, 2020.

90. Ibid.

91. Interview with staff member 1, February 14, 2020.

92. Interview with staff member 3, June 4, 2020

permanent records have been digitized. Insights into the digitization process make clear how unlikely NARA could deliver on a similar promise to digitize the records of the other three states whose records are held at NAS. The planned removal of Alaska's records from the PNW is a sharp blow for Alaskan researchers who would have to travel much farther to view non-digitizable records and calls into question NARA's commitment to its promises.<sup>93</sup>

Digitization is a major undertaking. According to staff, the process takes so long because it is a matter of balancing the volume of materials and the resources available.<sup>94</sup> A powerful way to share and improve access to information, digitization comes with financial, physical, and ethical limitations. Before scanning can begin, an archivist reviews the entirety of the series to understand what it is and what it contains. The technician must ensure the documents do not have personally identifiable information, or PII, which cannot be made available electronically because artificial intelligence programs could be used to collect Social Security numbers and other private information.<sup>95</sup> Technicians then scan each document, ensuring the image quality meets NARA standards. The document is described with metadata and cataloged by an archivist to ensure the series is discoverable in a digital environment.<sup>96</sup> The digitization process takes time, and in the end, does not guarantee improved access to records, especially if the NAS is shuttered and moved out of the state.

NARA might argue that access to records is maintained even if records are removed from the region through digitizing the records and making them available online, but conversations with staff reveal obstacles in removing in-person viewership as an option for researchers. If the NAS is shut down, NARA may increase their digitization efforts, but for those who want access to records that aren't yet digitized, researchers would have to "pay according to a fee schedule available online" for digital copies or physical scans to be mailed on an ad hoc basis.<sup>97</sup> In addition to cost, another downside is that "the number of scans or photocopies may be limited due to volume of the request, staff size and time available."<sup>98</sup> A visitor can make copies or scans for free, but if records are moved out of state that would take money, time, and travel that some do not have.<sup>99</sup> Additionally, the NAS research room is the only way to view records that cannot be digitized and made available electronically. Some

93. Peet, "Seattle National Archives Threatened with Closure."

94. Interview with staff member 2, February 14, 2020.

95. Interview with staff member 3, March 6, 2020.

96. Interview with staff member 1, June 15, 2020.

97. Interview with staff member 2, February 14, 2020.

98. Interview with staff member 1, June 15, 2020.

99. Interview with staff member 1, February 14, 2020.

materials are too fragile to be sent through a scanner, others may not render a high-quality image. The NAS houses maps from the Bureau of Land Management and the Bureau of Public Roads that are too wide or long to fit into scanners. Some maps are up to 100 feet long.<sup>100</sup> An in-person visit is the only way some researchers can view the documents that cannot be emailed or scanned, and the best way to avoid the additional costs of emailed or mailed copies—and this is assuming the researcher has access to a computer and internet on which to view and order records. Online access to records is an important public service, but the realities of the digitization process constrain the ability of the agency to make digitization happen and this is only one aspect of an archivist's work. An archivist's job is not limited to scanning and digitizing documents. Fielding requests and questions from researchers that call, email, or drop in is another area where expertise plays an important role in how information is accessed by those NAS serves.

For a reference interaction to be successful, the archivist must be familiar with more than just the collections in their care. Current NAS staff have an established sense of what is important to local communities, whether that be an historical event, an influential figure, or local industry and culture, and the institutional knowledge of where to find that information if it is not available at NAS. When people call with a question about where to find records that may not be in the collection, staff can refer them to other agencies in the region that may have what they are looking for: "that kind of intellectual control takes years to develop."<sup>101</sup> After the Alaskan National Archives were returned to the NAS, staff in Seattle who were familiar with the records were available to provide guidance and assistance to newer archivists. It took a year for staff to be functionally comfortable with Alaska's records, and staff are still learning new things every day.<sup>102</sup> Staff emphasize the importance of the archivist having local or regional context for service quality considering "how long it takes to get even a baseline handle on things."<sup>103</sup>

Another concern to be raised with the current plan for the archives is the risk this brings to the collection. Decentralizing national records into facilities across the U.S. reduces the extent of damage to priceless, irreplaceable records from environmental damage or natural disaster; e.g., staff say they frequently get calls asking for records that no longer exist.<sup>104</sup> Centralizing records by reducing the number of facilities increases the potential loss of records. In 1973 for example, a fire damaged 80 percent of Army and Air Force records at the National Personnel Records Center in St. Louis

100. Ibid.

101. Interview with staff member 2, February 14, 2020.

102. Interview with staff member 3, June 24, 2020.

103. Interview with staff member 2, February 14, 2020.

104. Ibid.

and the loss still affects people today.<sup>105</sup> The process of moving the records may also be cause for concern, although there was no damage to Alaska records during the trips to either Anchorage or Seattle.<sup>106</sup>

Improving access to resources through digitization will require a massive investment in time, money, and planning that the NARA does not have. Instead of promising access through digitization, closing the NAS will ultimately reduce access for the communities who need these resources most, put irreplaceable records at physical risk, and delay the digitization of records. The lack of community outreach, over-promising digitization as a solution, and potential disruption of service lead one to question whether the communities NARA serves are being prioritized in this decision. According to the PBRB report, “NARA has determined that it can fulfill its mission needs at the target relocation facilities” though how closing the NAS facility drives openness, cultivates public participation, or strengthens democracy is an open question.<sup>107, 108</sup> NARA may not have had the final say as to whether the FRC would end up on the PBRB’s chopping block. However, NARA chose to wait months to announce the decision to the public, neglected to advocate on behalf of the public about the facility’s utility and value to the region, and has repeatedly ignored requests for comment from the media. NARA accepted the PBRB’s framing that the value of the NAS should be expressed in efficiency, footprint, or utilization rate measured against the going rate for land in the Seattle real estate market rather than the value the archives bring to the region. NARA administration should understand the value that archives bring to the communities they serve, know how to assess that value, and be ready to communicate and advocate for their archives, a topic with enduring interest in the archiving profession.

## Value of Archives

The profession has long explored how to assess the value of archival institutions, and work in this area is ongoing. Archivists previously attempted to tie public confidence to building-level metrics. In the *Principles of Institutional Evaluation* that first appeared in 1977, archivists argued that “the evaluation of institutional services through application of standards inspires public confidence by verifying that archival objectives are met.”<sup>109</sup> In a later report, the same archivists committee explicated a set of 17 principles “derived from the theoretical elements that support archival work and

105. Ibid.

106. Interview with staff member 3, March 6, 2020.

107. Public Buildings Reform Board, “High Value Assets Report,” 60.

108. “Mission, Vision and Values,” National Archives and Records Administration.

109. “Report of Committee on Institutional Evaluation,” *SAA Extra* (August 1978): 7, <https://www.archivists.org/node/21119>.

a questionnaire that elucidates the statements of principle. The statements and questionnaire are designed to facilitate both the self-assessment and evaluation stages of this proposal.<sup>110</sup> Principle 7, “Physical Facilities”, asserts that space must be adequate and suitable along seven related measures, such as space for secure storage, provisions for accommodating patrons with disabilities and special needs, and space for the necessary equipment to provide access to “all the record forms among its holdings.”<sup>111</sup> By the time such measures were comprehensively surveyed at a national level in 1985, the results were disappointing if not confirmatory: “fire-protected storage space was clearly a problem.”<sup>112</sup> Probing whether such concerns were circumstantial, Mark Greene then urged archivists to see that “power is grounded in values. Power ... is a mechanism for supporting and implementing values”, and those words remain true across the spectrum of positions archivists inhabit.<sup>113</sup> In fact, archivists have redoubled their efforts to convey the value of their work by enhancing advocacy resources and building skills around communicating with non-archivists.<sup>114</sup> Dennis Meissner, in his presidential address to the Society of American Archivists in 2016, reasserted the necessity of metrics and of routinized research studies such that the value of archivists is immediately visible and easily comprehended by external audiences. The resultant Committee on Research, Data, and Assessment (CORDA) is actively working to broaden the collective knowledge base through gathering and laying groundwork to conduct, such as through A\*CENSUS II, studies that will express the value of an archives not only in space utilization rates but by principles-driven examination of services and programs—in reading rooms and remote learning environments alike and ever evolving.<sup>115</sup>

110. “Report of the Task Force on Institutional Evaluation,” *SAA Newsletter* (January 1980): 7, <https://www2.archivists.org/node/21118>.

111. “Report of the Task Force on Institutional Evaluation,” 10.

112. Paul Conway, “Perspectives on Archival Resources: The 1985 Census of Archival Institutions,” *The American Archivist* 50, no. 2 (1987): 186, <https://americanarchivist.org/doi/pdf/10.17723/aarc.50.2.1211240g46238078>.

113. Mark Greene, “The Power Of Archives: Archivists’ Values and Value in the Postmodern Age (with an Introduction by Dennis Meissner),” *The American Archivist* 72, no. 1 (2009): 20, <https://americanarchivist.org/doi/pdf/10.17723/aarc.72.1.k0322xop38v44153>.

114. Vince Lee and Rachel Seale, “Recap of ‘Carpe Media! Communications and Media Training for Archivists’ Workshop at ARCHIVES\*RECORDS 2018,” ArchivesAWARE!, September 6, 2018, <https://archivesaware.archivists.org/2018/09/06/recap-of-carpe-media-communications-and-media-training-for-archivists-workshop-at-archivesrecords-2018/>; Sarah Buchanan, Jane Gruning, Ayse Gursoy, and Lecia Barker, “Surveying Archivists and Their Work Toward Advocacy and Management, or ‘Enterprise Archiving,’” *The American Archivist* 80, no. 2 (Fall/Winter 2017): 268-295, <https://americanarchivist.org/doi/pdf/10.17723/0360-9081-80.2.268>.

## What's Next

FASTA is not over yet. There will be more opportunities for the PBRB to list buildings for fast-tracked disposition: “in two future FASTA rounds over a five-year period, the PBRB is responsible for another round of recommendations for sales, consolidations, property disposals or redevelopment worth up to \$7.25 billion.”<sup>116</sup> The PBRB report lists several recommendations for how their work can be made easier. One of which is to identify HVAs in “high value real estate markets,” or in “metropolitan areas with the highest value real estate assets.”<sup>117</sup> NAS is able to serve a significant number of researchers and community members in a variety of projects. The contributions of this facility to creative and intellectual pursuits in Seattle and the PNW cannot be understated. Despite this, the facility was deemed inefficient, not for its ability to carry out its mission, but for having a small workforce in a large facility located in a metropolitan area with a competitive real estate market. This is not the first time a National Archives facility has been closed or threatened with closing due to financial problems, either real or perceived. The Georgia State Archives experienced a series of budget cuts that led to severe risk of closure, as well. The newly constructed building for the Georgia State Archives led many to believe the state had mishandled public funds, when in fact, the building was completed within budget and on schedule.<sup>118</sup> Despite this, the organization spent the next eight years combating budget cuts. Only after concerted effort, strategic planning, and coordination with a coalition of stakeholders and organizations, did the Georgia State Archives manage to keep their facility open, albeit at a reduced budget and staff.<sup>119</sup> For NAS, activism has led to the U.S. House Committee on Appropriations, which funds the PBRB, to require the Board to submit a report on how NARA will maintain access to records for PNW residents although Congresswoman Pramila Jayapal, in whose district NAS resides, believes there is no possibility for reversal.<sup>120</sup> The PBRB

115. Paul Conway and Jennifer Gunter King, “Framing Research as Evaluation and Assessment: Introducing CORDA” presented at 2019 SAA Research Forum, <https://www2.archivists.org/am2019/research-forum-2019/agenda>.

116. Public Buildings Reform Board, “High Value Assets Report,” 2.

117. Public Buildings Reform Board, “High Value Assets Report,” 19.

118. David Carmicheal, “The Georgia Archives Budget: An Unfolding Crisis,” *Provenance: Journal of the Society of Georgia Archivists* 31, no. 1 (2013): 8, <https://digitalcommons.kennesaw.edu/provenance/vol31/iss1/4/>.

119. Carmicheal, “The Georgia Archives Budget.”

120. H.R. Report No. 116-XXX, “Financial Services and General Government Appropriations Bill, 2021,” <https://appropriations.house.gov/sites/democrats.appropriations.house.gov/files/FSGG%20Report%20Full%20Print.PDF>, 93; House Committee on Appropriations, “Appropriations Committee Approves Fiscal Year 2021 Financial Services and General Government Funding Bill,” July 15, 2020, <https://appropriations.house.gov/news/press-releases/appropriations-committee-approves-fiscal-year-2021-financial-services-and>.



will work with the GSA to sell the properties as a portfolio, rather than individually as originally planned, due to the pandemic.<sup>121</sup>

## Conclusion

Twelve buildings were identified for sale in the PBRB report. None have caused the uproar that this one has inspired.<sup>122</sup> For good reason: NARA is entrusted with safekeeping priceless, irreplaceable public records. Public access to such records allows citizens to “claim their rights of citizenship, hold their government accountable, and understand their history so they can participate more effectively in their government”—activities critical to a functioning democracy.<sup>123</sup> Both the PBRB and NARA failed to consider the painful and exploitative historical context of the FRC by conditioning access to national archival records on the economic climate of the area the archives happen to be located. When the PBRB focused their analysis on the cost of the space itself, rather than that which occupies that space, they made a judgement on behalf of the public that the contents of the cubic foot boxes were less valuable than another housing development. The value of the archives in Seattle should not be compared to, based on, or subject to, the value of the land the building sits on.

In a political environment that favors austerity and demands efficiency, NARA has had to make difficult choices about how to allocate the resources they have. Lack of funding, however, is not an excuse to keep communities in the dark about the future and safety of their archives, devalue the archives, or ignore the historical context of the archives which reveals injustices that permeate Seattle’s communities today. Attention to principles in archiving theory and practice could have allowed NARA to avoid the pitfalls of prioritizing bottom lines over public service. NARA should prioritize social equity as much as efficiency in policymaking.

The decision to close NAS was made through an accounting framework that subjected the value of the archives to an analysis inappropriate for the industry studied and which ignored the benefits NAS brings to the people of the region: the potential for discovery, the preservation of history, contributions to research in a variety of industries and universities, and the decades of experience NAS archivists and technicians bring to their work. Had the public been given advance notice or opportunity for input, it is doubtful the PBRB or NARA could have ignored their concerns. Ultimately, the decision to close the archives erodes the trust communities place in NARA to manage the records of history, cultural identity, and heritage. If

121. “Home,” Public Buildings Reform Board, <https://www.pbrb.gov/>.

122. Banel, “Feds Play Blame Game;” Erik Lacitis, “Despite Pleas, It Looks Like National Archives in Seattle Still Set to Close,” *The Seattle Times*, August 2, 2020, <https://www.seattletimes.com/seattle-news/6-months-later-as-national-archives-closure-still-set-for-seattle-a-lament-were-pretty-small-fry/>.

123. “Mission, Vision and Values,” National Archives and Records Administration.

Seattle's national archives can be closed based on utilization rates or real estate markets, so too might any other archives facility. The purpose of FASTA, the law which created the PBRB, is to quicken the disposition of properties deemed inefficient in order to "maximize the return to the taxpayer."<sup>124</sup> One is left to wonder what returns are worth losing the archives over.

124. Federal Assets Sale Transfer Act of 2016, 1.