



United States Department of the Interior

OFFICE OF THE SECRETARY

Washington, DC 20240

April 15, 2026

Via Electronic Mail: jruch@peer.org

Jeff Ruch
Public Employees for Environmental Responsibility
248 3rd Street #311
Oakland, CA 94607

RE: *Public Employees for Environmental Responsibility v. Department of the Interior, Office of the Secretary*, 1:25-cv-03971 (D.D.C.), Freedom of Information Act (FOIA) Request No. 25-007053

Dear Jeff Ruch:

This responds to your FOIA lawsuit captioned as *Public Employees for Environmental Responsibility v. Department of the Interior, Office of the Secretary*, 1:25-cv-03971 (D.D.C.) and your FOIA request, dated June 9, 2025, in which you sought the following:

“Recent news reports generally describe a plan by Interior Secretary Burgum to consolidate human resources, information technology, communications, finance, and other administrative functions throughout Interior agencies. See, for example: <https://www.govexec.com/management/2025/04/interior-department-consolidate-functions-across-country-leading-widespread-layoffs/404438/>

Pursuant to the Freedom of Information Act (5 U.S.C. 552) Public Employees for Environmental Responsibility (PEER) requests information detailing the plans for this consolidation. Specifically, we request:

1. A summary itemizing the reallocation of staff and other resources to accomplish the proposed consolidation;
2. A roster by location (i.e., national park, BLM field office, or other Interior Department unit) of those positions being reassigned from Department of Interior (DOI) agencies into DOI itself to accomplish this consolidation;
3. The timeline for the transfer referenced in #2, above;
4. The latest estimate of, and basis for, any overall cost savings to taxpayers as a result of this consolidation; and

5. Internal costs assessed to individual DOI bureaus or agencies, such as the National Park Service (NPS) for each employee subject to the consolidation, by the DOI, including
 - a) whether such costs assessments are one-time or ongoing; and
 - b) whether such assessments are levied on each NPS unit or against NPS as a whole.”

In February, we stated that there were 1,771 pages left to review. We have completed review of all these pages and have determined that 895 pages were duplicates and 269 pages were non-responsive. On March 16, 2026 we produced 251 pages.

At this time, please find a partial release consisting of 25 files including a total of 356 pages and 23 spreadsheets. At this time, please find a partial release consisting of 24 files including a total of 356 pages and 23 spreadsheets. These pages are responsive to points 1, 2 and 3 of the request. We have completed our search of the records and have determined that we do not have any records responsive to points 4 and 5.

In reviewing the 356 pages and 23 spreadsheets of released records, you will find that the government has made certain redactions pursuant to the FOIA Exemption found at 5 U.S.C. § 552 (b)(5):

Exemption 5

Exemption 5 allows an agency to withhold “inter-agency or intra-agency memorandums or letters which would not be available by law to a party ... in litigation with the agency.” [5 U.S.C. § 552\(b\)\(5\)](#). Exemption 5 therefore incorporates the privileges that protect materials from discovery in litigation, including the deliberative process, attorney work-product, attorney-client, and commercial information privileges. We are withholding pages in part under Exemption 5 because they qualify to be withheld both because they meet the Exemption 5 threshold of being inter-agency or intra-agency and under the following privilege:

Deliberative Process Privilege

The deliberative process privilege protects the decision-making process of government agencies and encourages the frank exchange of ideas on legal or policy matters by ensuring agencies are not forced to operate in a fish bowl. A number of policy purposes have been attributed to the deliberative process privilege, such as: (1) assuring that subordinates will feel free to provide the decisionmaker with their uninhibited opinions and recommendations; (2) protecting against premature disclosure of proposed policies; and (3) protecting against confusing the issues and misleading the public.

The deliberative process privilege protects materials that are both predecisional and deliberative. The privilege covers records that reflect the give-and-take of the consultative process and may include recommendations, draft documents, proposals, suggestions, and other subjective documents which reflect the personal opinions of the writer rather than the policy of the agency.

The materials that have been withheld under the deliberative process privilege of Exemption 5 are both predecisional and deliberative. They do not contain or represent formal or informal agency policies or decisions. They are the result of frank and open discussions among employees of the Department of the Interior. Their contents have been held confidential by all parties and public dissemination of this information would expose the agency's decision-making process in such a way as to discourage candid discussion within the agency, and thereby undermine its ability to perform its mandated functions.

The deliberative process privilege does not apply to records created 25 years or more before the date on which the records were requested.

Karl Bloom, OS Government Information Specialist is responsible for processing these records.

Cindy Cafaro, Attorney-Advisor, Office of the Solicitor, Department of the Interior, Washington, D.C. was consulted on this production.

Finally, please be assured that the Office of the Secretary is working to release all responsive records at issue in this lawsuit consistent with the contours of the Freedom of Information Act, 5 U.S.C. § 552. Should you have concerns about our production, we will timely communicate through our attorney of record in the U.S. Attorney's Office, Brian Levy.

Sincerely,

**KARL
BLOOM**

Digitally signed
by KARL BLOOM
Date: 2026.04.15
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Karl Bloom
Government Information Specialist
Office of the Secretary
FOIA Office