

U.S. House of Representatives
Committee on Natural Resources
Washington, DC 20515

June 26, 2024

The Honorable Deb Haaland
Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Ms. Heather Gottry
Director and Designated Agency Ethics Official
Departmental Ethics Office
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Secretary Haaland and Ms. Gottry:

The House Committee on Natural Resources (Committee) is particularly concerned with ensuring departmental officials' impartiality is not compromised. As such, the Committee seeks information from the Department of the Interior (DOI) and its Departmental Ethics Office (DEO) regarding how DOI plans to implement the updated guidance for the *Standards of Ethical Conduct for Employees of the Executive Branch (The Standards)*, recently issued by the Office of Government Ethics (OGE).¹

As you are aware, the updated guidance comes in the form of a final rule issued by OGE on May 17, 2024, to take effect on August 15, 2024, titled, *Modernization Updates to Standards of Ethical Conduct for Employees of the Executive Branch (Final Rule)*.² Subpart E of the Final Rule, 5 C.F.R. § 2635.502(b)(1)(iii) was updated as follows:

“By removing the qualifier “dependent” before “child,” meaning that, for purposes of the impartiality provisions, an employee will have a covered relationship with persons for whom any of their children are, to the employee’s knowledge, serving or seeking to serve as an officer, director, trustee, general partner, agent, attorney, consultant, contractor, or employee.”³

¹ Modernization Updates to Standards of Ethical Conduct for Employees of the Executive Branch, 89 Fed. Reg. 43686 (May 17, 2024) (to be codified at 5 C.F.R. Part 2635).

² *Id.*

³ Shelley Finlayson, *Key Highlights of Final Rule – Modernization Updates to Standards of Ethical*, OFFICE OF GOVERNMENT ETHICS (May 17, 2024),

OGE justified this change by claiming that “[t]his change acknowledges that certain business relations of an employee’s child may raise impartiality concerns regardless of that child’s dependency status.”⁴ The Committee is deeply interested in how DOI will implement the Final Rule, given the ethical concerns surrounding Secretary Haaland’s close relationship with radical environmental groups like the Pueblo Action Alliance (PAA), which employs Secretary Haaland’s adult child, Somah Haaland. In fact, on June 5, 2023, the Committee sent a letter spotlighting the conflict created by Somah Haaland, given the activist group’s close relationship with key DOI employees, including the Secretary, and subsequent potential influence over DOI policies.⁵

Pursuant to the Committee’s oversight authority, please provide to the Committee the following information and items in your possession, custody, or control, in complete and unredacted form, as soon as possible, but no later than July 11, 2024:

1. Identify and explain how DOI will implement the *Modernization Updates to Standards of Ethical Conduct for Employees of the Executive Branch* Final Rule, which takes effect on August 15, 2024. Include an explanation of how DOI will treat covered relationships with non-governmental organizations, particularly organizations employing children of DOI employees.
2. All documents and communications—including but not limited to all draft documents, legal opinions, and memoranda, emails, messages, and meeting or calendar invitations—related to the *Modernization Updates to Standards of Ethical Conduct for Employees of the Executive Branch* Final Rule, which takes effect on August 15, 2024.

An attachment to this letter provides additional instructions for responding to this request from the Committee on Natural Resources. Please contact the Majority staff for the Oversight and Investigations Subcommittee at (202) 225-2761 or HNRR.Oversight@mail.house.gov with any questions. Under House Rule X, the Committee on Natural Resources has “general oversight” of any matter relating to its jurisdiction, including all matters concerning the Department of the Interior.

[https://www.oge.gov/Web/oge.nsf/Legal%20Docs/9A61D9731DA08D9485258B200048C986/\\$FILE/LA-24-06.pdf?open](https://www.oge.gov/Web/oge.nsf/Legal%20Docs/9A61D9731DA08D9485258B200048C986/$FILE/LA-24-06.pdf?open).

⁴ *Id.*

⁵ See Letter from Rep. Bruce Westerman, Chairman, H. Comm. on Natural Resources, and Rep. Paul A. Gosar, Chairman, Subcomm. on Oversight & Investigations, to Deb Haaland, Secretary, U.S. Dept. of the Interior, and Heather Gottry, Director and Designated Agency Ethics Official, Departmental Ethics Office, U.S. Dept. of the Interior (June 5, 2023), https://naturalresources.house.gov/uploadedfiles/2023.06.05_haaland_ethics_compliance.pdf.

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Sincerely,

Handwritten signature of Bruce Westerman in blue ink.

Bruce Westerman
Chairman
Committee on Natural Resources

Handwritten signature of Paul A. Gosar in blue ink.

Paul A. Gosar, D.D.S.
Chairman
Subcommittee on Oversight and Investigations