

July 13, 2022

The Honorable Michael Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, D.C. 20460

Dear Administrator Regan,

On behalf of the Environmental Protection Network, I am writing to express our concerns about EPA's plans to retire its online archive this month. This archive serves an important public service by providing historical information on key environmental issues and past agency actions and we urge the agency to reconsider its path forward on this issue.

We applaud and strongly support EPA's commitment to transparency. Its online archive stands as an important example of the agency's leadership in enhancing transparency by equipping the public with important information resources needed to address today's pressing environmental and public health challenges. We are concerned that the agency's planned sunset of this archive will undermine EPA's credibility and slow its progress in advancing transparency more broadly. We believe it sends the wrong message at this critical juncture and may open the door to future efforts aimed at restricting access to important agency information.

We know that the agency takes its stewardship of EPA's information seriously and works hard to effectively manage its website. Under OMB Policy M-17-06, EPA, like all federal agencies, is required to have reasonable management controls and a review process to ensure that online information, and links to any external information, are accurate and meet quality standards. The agency has established a systematic process to periodically review its web content, including determining what information is current, outdated, and obsolete. We appreciate that overseeing EPA's online presence requires significant resources, which can be challenging in these times of tight resources.

We've learned from media reports that EPA's online archive is deployed on outdated technology that is no longer cost effective to maintain. Further, EPA indicated that it never intended the archive to be a permanent public repository of information. It is our understanding that the agency adopted its current plan to review its online content and sunset the archive this month based largely on these factors.

While we appreciate the desire to move forward, we strongly encourage the agency to pause and engage with key stakeholders to explore possible alternatives before abandoning the online archive. In addition to

providing an opportunity for EPA to more fully explain and discuss its rationale with interested parties, we believe there are a number of issues that would benefit from further consideration and discussion, including:

- External Input: In reviewing its online content and making decisions on its disposition, we recommend that the agency consider soliciting input from users on what information is most useful or relevant to them. This dialogue may reveal alternative approaches to target and protect information deemed most valuable by stakeholders;
- Costs: Further discussion may assist the agency in identifying possible creative funding approaches and options for continuing access under the current platform, while exploring longer term options; and
- Timing: More broadly, additional time would provide an opportunity to explore benchmarking with other federal agencies or organizations.

As a national organization of over 550 former EPA employees, we fully appreciate the challenges the agency faces in moving forward with initiatives that chart new and expanded ways to support enhanced transparency and public engagement. We encourage the agency to build on the success of EPA's online archive, recognize the critical importance of preserving the past, and set a new bold path forward.

Sincerely,

Michelle Roos
Executive Director
Environmental Protection Network

cc: Jennie Campbell, Director, Office of Information Management
John Lucey, Special Assistant to the Administrator
Vaughn Noga, Chief Information Officer and Deputy Assistant Administrator for Environmental Information