

**To:** EPA National Dialogue

**From:** The Access Initiative Staff, World Resources Institute

**Re:** Public Comment - US EPA Draft Information Access Strategy

**Date:** November 14, 2008

This document suggests improvements in the EPA's Draft Information Access Strategy as identified by staff of The Access Initiative, a project of the World Resources Institute<sup>1</sup>. In all, we find the document to be an exciting new step for the EPA and applaud the efforts of the Agency to spearhead innovation in information release.

## **I. Addressing the Digital Divide**

Improving access to information requires efficient dissemination of practical, quality information. The Internet is a productive platform for e-governance that is cost-effective and, increasingly accessible to the wider American public. However, low-income communities and socially marginal communities without easy Internet access require agency actions beyond the online strategy.

Our research in a number of countries, including the U.S., has shown that many people living in poverty do not have equal access to online forms of communication<sup>2</sup>. These obstacles may have one or more of the following causes:

- a lack of basic computer literacy skills;
- linguistic or cultural barriers;
- poor financial capacity to partake in computer-based activities;
- high travel costs to obtain relevant environmental news and information;
- low awareness about relevant environmental concerns in their region or existing mechanisms to address these concerns

### **Don't forget low technology solutions**

We commend the EPA on being a leader not only among federal agencies, but also internationally, in highlighting the importance of making it easy to find, understand and use information. In this spirit, *the EPA should make a greater effort to find non-technical solutions to many environmental information problems*. The EPA's strategy to improve access to information should scale up efforts to inform the public using mediums beyond the Internet. This includes print media — posters, advertisements on public transportation, newspapers, magazines, fliers, pamphlets — as well as, town meetings, local television commercials, and radio announcements. Air and water quality data, as well as periodic environmental status reports, can reach more marginalized communities (and the broader public) better when it flows through well-used and free channels such as electronic billboards, or bus stop advertisements. This could be facilitated through formal partnerships with local governments, other agencies, NGOs, and the media to increase exposure to environmental information. We encourage the EPA to include a scaling of such partnerships as a central aspect of its access to information program.

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<sup>1</sup> For more information on the Access Initiative and the World Resources Institute, see the note on the last page.

<sup>2</sup> Foti, J. and L. de Silva. 2008. Poverty sensitizing the access initiative methodology. Access Initiative Working Paper No. 1. Available online at:

<http://www.accessinitiative.org/sites/default/files/Poverty%20Paper%20for%20Public%20Review.pdf>

## **Enabling intermediaries to implement both high-tech and low-tech information solutions**

EPA can do more to build the capacity of sub-national government agencies and other agencies to help make information more intelligible. This might, at one extreme, mean that EPA Regional Field Offices might organize regular face-to-face meetings with interested parties to understand data such as the toxics release inventory, or at another extreme, might include long-term collaboration projects with local government agencies, such as public libraries, public schools, and secondary educational institutions. EPA can train volunteers in the skills of accessing and featuring specific environmental information that relates to the communities. Again, while many or most citizens have access to Internet, many get official information through intermediary organizations, and these intermediary organizations need training. We applaud the EPA's proposed Help for Helping Hands program, and hope that, if the program goes forward, it will include training for intermediaries, not just in high-technology applications, but also in awareness.

## **II. Helping the public find information**

### **Make Environmental Impact Assessment information easy to find**

As it stands, the EPA's environmental impact assessment database is clean and easy to read, but does not make EIA documentation readily accessible to the general public.

#### *Automatically publish all EIA documentation:*

At present, most federal agencies carrying out an EA or EIS make such documentation available upon request. We suggest that such documentation be made readily available automatically upon publication. Extra steps, such as requesting information from individual officers lessens the chance that individuals will engage in the EIA process.

#### *Centralize documentation for specific project EIAs and PEIAs:*

In addition to the above, all EIA documentation, including Draft EIS documents, Final EIS Documents, EAs, RoDs, FONSI, public commentary and agency response should be located at one location (the Environmental Impact Statement Database). This database should be maintained on the EPA website.

#### *Centralize EIA information across all agencies bound by NEPA and federal, state, local, and tribal jurisdictions*

Many members of the public do not know which agencies are conducting activity across agencies and in particular regions. While the EPA's EIS Database has made it easier for the public to find out what federal EIA activities are occurring within their states or regions, it should do so by locality. A customizable "push" system such as a Really Simple Syndication (RSS) feed which alerted a member of the public anytime that an EA was being prepared within an (adjustable, customizable) number of miles of any chosen locale(s) would be a central component. Again, while this component would be helpful on its own, in combination with the full, centralized, automatic publication of all EIA documentation, such tools would be invaluable.

#### *Systematizing documentation numbering system or categories*

As it stands, the system for EIA documentation is opaque. By making such documentation readily searchable through a transparent numbering system, interested citizens could more readily find corresponding documentation. For example, the Ruralville Highway Project would

be given a code number. For example, let us give it 12345. Each relevant document would be numbered in a transparent way, which would be detailed on a corresponding website. The EA documentation would consistently be 12345 – EA – I (for a first draft), and the FONSI, could be 12345 – FONSI – I, and these would be located within the corresponding URL (Uniform Resource Locator) so that individuals could, in theory find all relevant documentation, predictably, regardless of their use of a search engine.

### **Layering multi-level local, state, and federal data**

Beyond EIA documentation, the EPA information strategy should include actions to link up access to databases and search mechanisms from other Federal agencies as well as state and tribal agencies, non-governmental organizations, and the private sector with targeted environmental expertise, as a cost-effective way of instantly expanding the availability of information. Allowing the public to easily search within such a range of resources builds trust and invites transparency between the private, public, and government.

### **Online librarians**

In addition to staffing various regional, specialized libraries, as detailed in the draft strategy, the EPA should maintain a coterie of online librarians available through a number of electronic channels, including chat services, hot lines (including a “night owl” service, as many people do environmental research in their spare time), and email for quick responses to front-line information disseminators as well as end users.

### **Search engine optimization**

One of the problems the public faces with regard to access to information, generally, is that once information becomes available, we face the problem of information over-saturation. Thus there is a link between two goals highlighted in the Draft Information Strategy is the need to organize EPA information and data into formats that promote better understanding and the need to enable people to find environmental data. Search engine optimization would help the public find the data and information that they are looking for more quickly. Currently, information access is limited by the fact that many relevant documents and explanatory notes rank very low on Google (2<sup>nd</sup> or 3<sup>rd</sup> pages) or on Yahoo! search engines. Experience suggests that most individuals do not go beyond these first few pages and that few use internal search engines. As a result, investment in search engine optimization would pay considerable dividends.

## **III. Access Implementation Plan**

The Access Implementation Plan referenced in Section 4 of the Draft Information Access Strategy will require a sustained effort from both EPA officials and the public if it is to be successful. While the document lays out a vague procedure for the development of the Access Implementation Plan, we suggest that the EPA include in its outline of the planning process explicit reference to public participation in the collaborative spirit of both the current document under review and past participation.

The Access Implementation Plan will be a crucial stepping stone for improved access to information. Establishing a system for monitoring progress on access to information comprises one of the major duties of this task force. A valuable addition would be to include provisions for third party civil society monitoring of the Plan’s implementation.

#### **IV. Incorporating the EPA's leadership role in civil society engagement internationally**

Since its creation, the EPA has been an international leader in providing expertise around issues of public participation and access to information in matters affecting the environment. This includes its role in advising the State Department in international processes as well as in direct contacts with officials and members of the public overseas. We suggest that the Office of Information Affairs make explicit in its strategy plans to energize the broader EPA to ramp up existing efforts in this area.

##### *Leading by example*

We encourage the EPA to continue and to re-invigorate this tradition, especially with regards to access to information, where there have been some setbacks in recent years. To that end, the Draft Access to Information plan should outline efforts at international dissemination the cutting-edge tools and programs the EPA under development. While we understand that this is not the only mandate the EPA has, we believe that it has historically been an important role and will continue to be.

##### *Leading through partnerships*

The EPA can continue to foster collaboration with the international environmental community and international organizations at a relatively small cost. The Office of Information Affairs already partners with international institutions and multilateral organizations, including the Asian Development Bank, World Bank, UNEP, OECD, WHO, that have expertise on a comprehensive range of environmental topics, but which could benefit from greater collaboration and harmonization with the EPA's efforts. Given the international nature of many environmental problems, and corresponding issues of legitimacy of environmental decision-making processes (such as transparency, corruption, and non-compliance), it is critical that the EPA and cooperating agencies continue to spread initiatives such as the advanced Information Access Strategy across borders.

##### *Leading through international processes*

Given the impending shift in administrations it is likely that there will be changing emphasis to re-engage international process. In the EPA's role as an advisor to the State Department, we recommend that the Office of Information Affairs press to include environmental information and public participation where relevant.

#### **V. Concluding Notes**

We applaud the Office of Information Affairs efforts regarding the Draft Information Access Strategy. While we are impressed with the efforts to make more the Agency's information systems more searchable, understandable, and useable, we hope that you will consider the needs of the public, especially the less fortunate, as you review our commentary. Thank you for the opportunity to comment. We look forward to continued engagement in this process.

## **About the World Resources Institute and the Access Initiative**

The World Resources Institute (WRI) is an environmental think tank that goes beyond research to find practical ways to protect the Earth and improve people's lives.

Our mission is to move human society to live in ways that protect Earth's environment and its capacity to provide for the needs and aspirations of current and future generations. Because people are inspired by ideas, empowered by knowledge, and moved to change by greater understanding, WRI provides—and helps other institutions provide—objective information and practical proposals for policy and institutional change that will foster environmentally sound, socially equitable development.

The Access Initiative (TAI), a project within WRI's Institutions and Governance Program, is an international coalition of civil society groups collaborating to promote national-level implementation of commitments to access to information, participation, and justice (access rights). Part of TAI's strategy is to establish common guidelines for national-level access rights in decision-making affecting the environment and to develop and promote the use of a toolkit and common methodology to quantify and assess the performance of government institutions.

These common guidelines and the toolkit were assembled in the context of TAI's experience and research in comprehending barriers to these access rights, formulating how best to institute policy reform that advocates accountability and transparency, and carrying out the analysis of several case studies, which resulted in the organization of specific indicators to determine the existence of laws and the extent to which the effort and success of the implementation of such laws effect positive change.<sup>3</sup>

It is with this perspective WRI offers this public comment. Thank you for taking the time to read our input.

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<sup>3</sup> TAI Website, [www.accessinitiative.org](http://www.accessinitiative.org)