



The Honorable Michael Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460
michael.regan@epa.gov

Re: Retiring the EPA Online Archive

Dear Administrator Regan,

We the undersigned write to express our opposition to EPA's plan announced in February to sunset its online archive in July 2022. The vast majority of our government's interaction with the public comes through digital channels; public digital archives such as the EPA's are of enormous value to historians as well as to the public.

This EPA archive has already proven immensely useful to environmental historians.¹ Not only are citations to it regularly featured in traditional scholarly venues, it has greatly facilitated projects such as "[A People's EPA](#)", a website and Twitter feed through which historians help explain the work of the EPA to a broader public.

Not just historians but those from a variety of academic disciplines as well as the public rely on the EPA digital archive for information, insight, and analysis. The site has provided resources for others working in ecology, biology, toxicology, and other environmental sciences as well as geography, law, sociology, political science, and public health. Professors and teachers at various levels, from K-12 schools to the graduate level utilize the archive as a pedagogical resource, directing students to

¹ Works that cite <archive.epa.gov> include: Bahng, Aimee. "The Pacific Proving Grounds and the Proliferation of Settler Environmentalism." *Journal of Transnational American Studies* 11, no. 2 (2020); Cronin, John. "The Cuyahoga fire at fifty: a false history obscures the real water crisis that never ceased." *Journal of Environmental Studies and Sciences* 9, no. 3 (2019): 340-351; Elmore, Bartow J. "Roundup from the ground up: A supply-side story of the world's most widely used herbicide." *Agricultural History* 93, no. 1 (2019): 102-138; Fredrickson, Leif, Christopher Sellers, Lindsey Dillon, Jennifer Liss Ohayon, Nicholas Shapiro, Marianne Sullivan, Stephen Bocking et al. "History of US presidential assaults on modern environmental health protection." *American journal of public health* 108, no. S2 (2018): S95-S103; Gillam, Carey. "An Award-Winning Discovery." In *Whitewash*, pp. 23-41. Island Press, Washington, DC, 2017; Gutkowski, Andrew. "The Evolution of Environmental (In) Justice in Spartanburg, South Carolina, 1900-2000." *Journal of American History* 106, no. 4 (2020): 923-948; Hepler-Smith, Evan. "Molecular bureaucracy: Toxicological information and environmental protection." *Environmental History* 24, no. 3 (2019): 534-560; Rankin, William. "The Accuracy Trap: The Values and Meaning of Algorithmic Mapping, from Mineral Extraction to Climate Change." *Environment and History* (2022); and Spears, Ellen Griffith. *Baptized in PCBs: Race, Pollution, and Justice in an All-American Town*. University of North Carolina Press, 2014, and *Rethinking the American Environmental Movement Post-1945*. Routledge, 2019.

pages that offer authoritative records of the geographies they are exploring. Not least among those who have relied on the EPA's online archive are those working with and living in more marginalized or environmental justice communities, a stated priority of current EPA leadership.

Having easily accessible documentation of the extensive EPA's investigations and records of decision for Camp Lejeune, North Carolina, for instance, has helped overcome local doubts about the agency's effectiveness, yielded greater understanding of chemical exposures, and otherwise significantly supported the agency's efforts at clean-up. Here and elsewhere, residents faced with a potential environmental hazard can more easily access the agency's past work in their locale as an aid to understanding prior investigations at the site.

The importance of EPA's online archive is perhaps best illuminated by considering what will be lost when this archive is taken down. The many mentioned uses of EPA documents will become much more difficult for those who cannot travel to EPA's print collections, and with any pandemic recurrence, well-nigh impossible. A tremendous gap will also open up in what more recent historical records are accessible, as it takes many years for any preserved documents to be transferred to and made available through the National Archives. It will become much more difficult for historians to assess and interpret this agency's recent past, much less to situate it within longer histories and larger contexts.

We understand that the EPA's provision of a public archive of its own documents and deliberations is voluntary and that online maintenance entails some costs. But those need to be factored against the better and broader understanding it has nourished of the vital work done by this federal agency, whose own future hinges on greater public awareness of and support for what it does. Instead of doing away with the EPA archive, the Biden administration should promote it as a model for other parts of the Executive Branch. In our digital age, agencies *should* make their own publications and other public interactions more quickly, thoroughly, and durably accessible, both to historians and to the larger publics our government serves.

Sincerely,



Sarah S. Elkind
President
American Society for Environmental History

The following organizations have cosigned this statement:

American Historical Association
College Art Association of America
Environmental Historians Action Collaborative
National Council on Public History
Society of Architectural Historians
World History Association