Information accessibility needs to be part of the plan

Comment by the Environmental Data and Governance Initiative Website Monitoring Team
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Introduction

The Environmental Data and Governance Initiative (EDGI) Website Monitoring Team welcomes the opportunity to comment on the Environmental Protection Agency (EPA) Fiscal Year 2022-2026 Strategic Plan (Docket Number EPA-HQ-OA-2021-0403). EDGI is a multidisciplinary, cross-professional organization that has been documenting, analyzing, and contextualizing environmental governance actions since January 2017. EDGI's Website Monitoring Team works at the intersection of information and environmental policies, tracking changes to thousands of federal web pages related to climate, energy, and the environment in order to assess shifts in public access to or federal presentation of environmental science and policy information. Websites are the primary means by which the federal government communicates with the public,[1] and web resources can directly affect public knowledge and participation in democratic processes, and state, local, and Tribal governments' knowledge and capacities as well. With the EPA's emphasis throughout this strategic plan on community and partner engagement, we focus this comment on the critical role that accessible, approachable, useful web-based information plays in stakeholder engagement. We urge the EPA to **incorporate into its strategic plan clear and actionable steps toward improving its website information** to facilitate public learning and participation in environmental governance.

EDGI fully supports the six stated goals of the plan, as each is critical for environmental and human health. We also fully support its four guiding principles, but recommend that the EPA go further than transparency and **hold accessibility as a co-equal guiding principle**, which from our perspective, is essential for advancing justice.

We are glad to see several mentions in this strategic plan about increasing the accessibility of information and the involvement of communities. We are particularly encouraged by the objective to build climate literacy of EPA employees and partners (p 16), and would encourage EPA to **make building the general public's environmental and climate literacy a top agency objective as well**. It is also heartening to see public information provision as part of several objectives, including those relating to the climate crisis (p 10),

environmental law enforcement (p 36), ensuring clean and safe water (p 46), and ensuring the safety of chemicals (p 70). However, while many of these passages suggest improving resources or making them more accessible, they do not offer details regarding how that might occur or what form more accessible resources might take. There are also a few places (e.g. pp 26, 89) that convey the importance of community engagement, but don't describe steps to foster that engagement. Elsewhere, the strategic plan refers to the importance of providing tools to state, local, Tribal and community partners (e.g. pp 8, 12, 16, 90), for example stating that the "EPA will continue to provide tools, data, and technical expertise to help subnational governments implement clean energy policies and programs that reduce emissions, maximize cobenefits, and prioritize overburdened and underserved communities" (p 12). However, there is a distinct need to evaluate whether the current provision is adequate. The EPA strategic plan does identify stakeholder feedback with respect to customer experience of information management design (p 85), but we encourage the EPA to comprehensively **expand its stakeholder feedback research to include feedback regarding web resource content as well as design**, with a specific focus on content accessibility and approachability.

Stakeholder involvement requires critical knowledge as well as engagement. While the EPA mentions the desire to make information more accessible, it neglects to include actions to achieve that aim. **Our public comment focuses on recommendations for how the EPA can improve the accessibility and approachability of its web resources**.

Build scientific and environmental literacy

The primary and overarching recommendation EDGI's Website Monitoring Team offers, based on five years of studying the EPA website, is to **design the EPA website to be a tool to build public scientific and environmental literacy**. Ladders of information should be created for each topic, such that members of the public with various levels of background knowledge can find information at the appropriate level of detail and complexity for their starting point, and increase their knowledge of a subject through engaging with the agency websites.[2] The National Climate Assessments and EPA's Climate Indicators website provide excellent examples of ladders of information, though even these resources could be improved by encompassing related or contextual information, such as relevant regulations or adaptation strategies. We recommend that each primary topic page link to and explain the relevance of related pages, from similar topics to specific case studies. Treating the

agency website as a nimble tool for learning will facilitate greater public knowledge and greater public engagement with environmental governance.

The EPA should **create webpages for each of its regulations, and include their environmental, scientific, technical, and legal context**. The scientific basis for each regulation should be clearly documented and presented through ladders of information such that the public can learn the purpose and presumed effectiveness of regulations in achieving goal environmental outcomes. The regulatory context, including the history of litigation for a given regulation or related regulations should also be provided such that the public can learn about the regulatory landscape surrounding critical environmental issues. Ensuring visible relationships between regulations and environmental issues they affect is essential for expanding public understanding of and participation in rulemaking processes.

Center civic engagement

In addition to designing the infrastructure and content of the EPA website to foster scientific and environmental literacy, we recommend that the EPA **center civic engagement through its web resources** as well. The EPA website is the agency communication tool that is most widely accessed by the public, and any effort to expand participation in agency proceedings should include concerted attention to promote those opportunities on the website. Information about upcoming events, such as public meetings of advisory councils, public comment periods for proposed regulations, or public comment periods for proposed permits should be broadly advertised on all related subject matter pages on the EPA website. Further, opportunities for civic engagement should be aggregated not only in regulations.gov, but also on the EPA website itself, where the EPA can readily link related subject matter information for each proposed action.

In addition to advertising opportunities for civic engagement regarding agency actions, **the EPA website should provide an avenue for public feedback about the design and content provided on the website**. Inviting the public to request further information, clarification, or correction of information is likely to yield improvements to EPA's web resources.

Conclusion

EDGI's Website Monitoring Team is encouraged by the goals, objectives, strategies, and intentions of the EPA's FY2022-26 draft strategic plan. We are heartened to see multiple references regarding making information more accessible to stakeholders, including community partners and the public at large. However, we see an opportunity for the EPA to provide considerably more detail regarding that accessibility and the means to achieve it. EDGI offers this set of recommendations to underscore the importance of designing the EPA website to serve as an instrument for teaching scientific literacy and to promote public engagement. Based on the results of our monitoring of the EPA website over the past five years, we hope these recommendations will resonate and, in turn, be incorporated into the EPA's strategic plan.

References

1. OFFICE OF MANAGEMENT AND BUDGET. Policies for Federal Agency Public Websites and Digital Services. Nov 8, 2016. Available from: https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2017/m-17-06.pdf
2. Gehrke G, Beck M, Paz A, Wilson A, Nost E, Poudrier G, EDGI. (2021) Access Denied: Federal Website Governance Under the Trump Administration. Available from: https://envirodatagov.org/publication/access-denied-federal-web-governance-under-the-tru mp-administration/