Statement to the National Advisory Council for
Environmental Policy and Technology

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Members of the National Advisory Council for Environmental Policy and Technology, thank you for inviting me today to speak on behalf of the American Library Association (ALA). I sincerely appreciate the opportunity to comment on the closure of libraries in the EPA network during this public comment period.

My name is Leslie Burger, and I am the President of the American Library Association, the oldest and largest library association in the world with some 66,000 members, primarily school, public, academic, and some special librarians, but also trustees, publishers, and friends of libraries. The Association provides leadership for the development, promotion, and improvement of library and information services and the profession of librarianship to enhance learning and ensure access to information for all.

I would like to talk today about two things --
First, the importance of access to scientific, environmental, legal, and other government information for EPA employees and the American public.
Secondly, the recent closure of several regional libraries in the EPA Library Network, as well as reduced access in other EPA library locations. Given ALA’s mission to promote and foster the public’s access to information, it should come as no surprise that ALA finds these closings troublesome.

The closing of these libraries initially took place under the guise of a proposed $2 million budget cut – initially suggested by the EPA and included in President Bush's budget proposal for Fiscal Year (FY) 2007. Though recently, the EPA has backed away from the financial angle in favor of the approach that the process of digitization will help a "broader audience" in gaining access to these materials, as EPA spokespeople mentioned in a teleconference on Monday, but many scientists, EPA staff, and librarians continue to dispute this contention.

Is EPA's library plan based on the end users' needs? Apparently not. Our sources tell us that there has been no outreach to the EPA Library User community – the thousands of scientists, researchers, and attorneys that use these resources on a daily basis as well as
members of the public who have benefited greatly from access to these unique collections. There has been a lot of talk about getting information to a "broader audience," but how do the steps being taken here speak to that effort? ALA doesn't see what's being done as connected to users' needs in any way.

EPA has already begun closing libraries and restricting public access to the few libraries that are still open. Thus far, we have seen the closing of three regional libraries – in Chicago, Dallas, and Kansas City – and the Prevention, Pesticides & Toxic Substances (OPPTS) and headquarters libraries in Washington, DC. The regional library in New York City has announced that it is scheduled to close its doors on January 2.

Thus, we have two primary concerns about these closures:

1) in the course of shutting down these libraries, valuable, unique environmental information will be lost or discarded, and
2) because there are fewer libraries and professional library staff, scientists and the public will have limited access to this information.

**Let me first address the loss of valuable environmental information.**

In their haste to close down libraries by arbitrarily established deadlines, hundreds of valuable journals and books have been destroyed. Materials that are unique to EPA and in some cases materials that exist nowhere else in the world are no longer available.

In a plan that is best described as “convoluted and complicated,” materials from closed libraries are being boxed and sent to other locations where they are slowly being re-cataloged and then sent back to the Headquarters Library in D.C., where there is no room to house these resources. Other resources have been sent to Cincinnati to NEPIS where they are slowly being digitized.
Further, ALA is troubled by the "dispersing" of materials from the closed regional libraries and the OPPTS library here in Washington, D.C. What this "dispersement" entails isn't exactly clear at this point and what concerns ALA is how this information will be handled, and therefore what type of long-term damage has been done to the effectiveness of EPA and the ability of the American public to find important environmental and government information.

Unfortunately, there is a lot we don't know: what the materials are, whether there are duplicate materials in other EPA libraries, whether these items have been digitized, and whether a record is being kept of what is being dispersed and dumped.

Will digital documents be listed in OCLC? Is there metadata or cataloguing being created for digital documents? What will happen to the OCLC holdings for closed libraries? How are "help desks" and other "library" functions being organized so that trained professionals are available to help the users of EPA library and information services?

Without more information about the EPA's digitization project, we cannot assess whether they are digitizing the most appropriate materials, whether there is appropriate meta-data or cataloguing to make sure that people can access the digitized materials, etc. In the age of digital media it has become easier and easier for information to simply get lost in the shuffle, and there is no way of knowing if that's the case here.

The details mean a lot. Certainly, not all parts of each EPA library collection can be digitized; they probably have some materials that are copyrighted, for example. But there is so much specialized and unique material – including databases and reports already paid for by taxpayers – and we do not know if these are part of the digitization projects. Further, we do not know about how their maps or other specialized formats have fared, formats that are very difficult and time-consuming to digitize.

Since each EPA library had a specialized mission, these groups of materials are now, seemingly, gone.
EPA also claims to have been following ALA guidelines in its reorganization of holdings. While we would be pleased to meet with EPA to discuss digitization plans for the EPA network of libraries, EPA has not contacted ALA at any point in this reorganization process.

**We have a deep concern with limitations these closings would place on the public’s access to EPA library holdings.**

As one recently retired EPA librarian described it, the EPA libraries have been functioning like a virtual National Library on the Environment. (Indeed, the EPA was at one time a leader in providing public access to critical information in their collections.) The "virtual" national EPA library system functioned as a type of single national system. Because of its networking (both technical and human) and inter-library loan and mutual reference services, users in any EPA library had access to the collections at all other sites. This type of structure is generally very cost-effective and provides wide public access for staff and for the public.

Now that some of these regional libraries and the pesticide library are closed, key links have been removed from the chain, thus weakening the whole system, not just for those users closest to the closed facilities.

The ALA understands that we are living in the 21st century, an age when users can access much of what they need from their own desk. We also understand how complicated and costly the move to digitization can be. But the bottom line is that libraries still need skilled professionals to a) assist users, b) organize Internet access, and c) determine the best way to make the information available to those users.

Further, there are still traditional library users out there. Not everyone does their searching via web-based search engines. Many would still rather put their trust in the hands of a knowledgeable library professional, someone who knows the materials inside
and out. It has been argued that the time of librarians is vanishing with the rise of the Internet, but this is a case in point where that is just not so. The EPA's environmental holdings are vast and dense, and a simple search engine just isn't enough. With the loss of the brick-and-mortar facilities comes the loss of the most important asset in the library: the librarian. After all, what good is information if you can't find it?

The future, it seems, calls for a hybrid, where not every single item or service is online, nor is everything confined to a physical structure. And the backbone of it all is a profession of skilled, knowledgeable, and, most importantly, helpful information specialists: librarians.

**In closing:**

ALA asks that this Council recommend to the administrator that the EPA:

- a) halt all library closures;
- b) discuss a plan with your stakeholders on how best to meet user needs and plan for the future;
- c) stop dispersing and dumping of any of their library materials immediately;
- d) stabilize and inventory the collections that have been put in storage;
- e) reestablish library professionals – inherently governmental library professionals.

Further, we would ask for library specialists to assist in any investigations, such as that conducted by the Government Accountability Office (GAO) study, or other inquiries, as to what is happening to these materials. Those EPA staff who are willing to talk (or retired and not at risk) tell us that these materials are being at best dispersed and, at worst, discarded. Also, and just as importantly, without trained librarians, users are having a very difficult time accessing what does remain of the EPA library system.

We appreciate your responsiveness and look forward to determining how we can save these collections, stabilize the library services for users and understand how best to
maximize public access for staff, scientists, and the public at large to important environmental information.

Thank you again for this opportunity to speak on behalf of the American Library Association, and I am happy to take any questions from the Council.