



November 12, 2024

To: U.S. Open Government Secretariat
General Services Administration

From: Katie Hoeberling, Cathy Richards, and Emelia Williams, Open Environmental Data Project ([OEDP](#))

Comment in response to Request for Information on the 6th U.S. Open Government National Action Plan (Docket No. GSA-GSA-2024-0016)

Thank you for the opportunity to submit comments on this important matter. Through research, convenings, and collaborative pilots, OEDP creates multi-sector strategies that strengthen the role of data and civic voice in environmental and climate governance. We see tremendous opportunity in the Open Government National Action Plan to advance more robust and equitable environmental strategies using open government principles, as well as to improve public participation in policymaking, by (i) making regulatory information not just open, but broadly more usable and (ii) creating processes to better integrate community data into environmental governance.

I. Prioritize the understandability and broad usability of open regulatory and research data.

1. **The problem:** Modernization initiatives within federal public agencies like the Environmental Protection Agency (EPA),¹ as well as the Office of Science and Technology Policy [2022 memorandum](#) on “Ensuring Free, Immediate, and Equitable Access to Federally Funded Research” offer opportunities to bring public environmental data in line with the [U.S. Open Data Policy](#). However, while regulatory and research information is becoming increasingly available, these datasets are rarely standardized or contextualized, and tend to be stored in fragmented databases, creating barriers for their reuse by researchers, communities, and public agencies themselves in answering critical environmental health questions.
2. **Opportunities to build on existing work:** OEDP co-convenes the Beyond Compliance Network, which collaborates to enhance the openness, accessibility, and interoperability of regulatory environmental data and infrastructure. We created an [Advocacy toolkit](#), offering recommendations for agencies publishing environmental data. Key recommendations are highlighted below, with further details available in the linked document above. We recommend that the Open Government National Action Plan include these recommendations in relevant regulatory agencies' reporting policies.
 - **Data Quality:** Include structural and reference metadata with all published data to allow users to assess the context and quality of data collection.
 - **Data Accessibility:** Host agency regulatory data in a central location instead of dispersing it across multiple websites, and provide data in formats that support easy integration into databases, such as APIs, .csv files, or bulk download options. Agencies should also clarify data ownership and usage terms, using clear licensing language from standards like [CC BY 4.0](#) or [ODbL](#) to eliminate ambiguity.
 - **Data Timeliness:** Release data on a rolling basis in alignment with its collection frequency, ensuring that necessary regulatory quality checks are maintained. Agencies should also publish anticipated release schedules.
 - **Data Standardization:** Use a consistent data format across types and agencies, with crosswalks for any differences in standard, to facilitate interoperability.
 - **Data Care:** Ensure that agency staff and institutional resources are equipped to maintain data systems. This includes establishing minimum commitments for data storage and preservation, building in-house expertise on evolving best practices, and developing new infrastructure as needed to accommodate additional data and metadata.

II. Build capacity and create processes for better integrating community data into environmental governance.

1. **The problem:** Frontline communities bear the greatest impact from climate change and environmental pollution. They are also increasingly generating their own data, adding vital social and environmental context often missing from traditional research or agency data. However,

¹ See, for example, the [Integrated Compliance Information System \(ICIS\) Modernization Board](#).

these community data collectors encounter significant challenges when trying to integrate their knowledge into federal systems. They must navigate complex local and federal policies within dense legal frameworks, and even when there is interest or clear need, agencies and researchers may lack the capacity to locate or responsibly integrate this data.

2. **Opportunities to build on existing work:** Several federal initiatives offer a foundation on which to integrate equity, civic participation, and open science practices. Agencies like [EPA](#), [NASA](#), and [NSF](#) increasingly support collaborative research that require or incentivize community partnerships, which could be expanded to include capacity building and technical assistance components. EPA's newly established Office of Environmental Justice and External Civil Rights ([OEJECR](#)) and NASA's Transform to Open Science ([TOPS](#)) program are both well-positioned to support such capacity building.² EPA also maintains the Environmental Information Exchange Network ([EN](#)) which facilitates "data sharing among EPA, states, tribes and territories."
3. **Innovative approaches:** To enhance the use of community-generated data in regulatory processes, agencies that support environmental data collection should strengthen internal capacity to recognize, integrate, and collaborate around this data. By aligning data standards, supporting community connections, and addressing barriers, agencies can ensure that community insights inform policy and action. The Open Government National Action Plan should prioritize incorporating these approaches into agency strategic plans and policies. Key recommendations include:
 - **Establish and communicate clear channels for community-generated data to prompt regulatory attention when relevant,** ensuring community ownership of data and active involvement in setting terms for data use and protection. See Figure 1 in the NACEPT 2016 Report: "[Environmental Protection Belongs to the Public, A Vision for Citizen Science at EPA](#)" for recommendations for how community data can be applied.
 - **Work to understand community needs and capacities with respect to meeting agency data quality standards, and support community actors in meeting them.** Assessments could focus on data and digital literacy, quality control measures, monitoring instrument availability, and how communities wish to use the data they collect. Regional technical assistance centers, such as EPA's, could be expanded to help communities meet agency data standards and build community digital literacy.
 - **Initiate a collaborative co-design process for data standards that protect sensitive information and accommodate community data.** An interagency working group could create and curate resources such as data-sharing agreements templates to safeguard privacy and prevent harm.
 - **Support the incorporation of community-generated data into tools such as EPA's Climate and Economic Justice Screening Tool ([CEJEST](#)) and EN platforms** through mechanisms such as grant funding, to ensure that public datasets reflect community needs and priorities. An advisory council that includes representatives from community organizations and data-sharing agencies could make recommendations for how federal databases like EN can accommodate community-generated data, as well as how data governance processes can center community priorities.
 - **Establish internal capacity building programs that develop translational and intermediary roles.** These roles could facilitate connections and responsible sharing between data holders and seekers. Any such program should be designed with data-collecting communities.

Additional resources:

- [Environmental Data as a Public Good](#), an Opportunity Brief from OEDP
- [Beyond Compliance: Findings from an Investigation of Environmental Health Data Systems](#)
- [GovLab's Data Responsibility Journey](#)
- [IF's Data Patterns Catalog](#)

² [OEJECR](#) is tasked with "engag[ing] with communities with environmental justice concerns, and provid[ing] support for community-led action." [TOPS](#) is tasked with advancing open science culture across agencies, and lists "broadening participation by historically excluded communities" as a requisite part of its strategic objectives.



We welcome the opportunity to further discuss these recommendations with your team. Please contact OEDP Director of Policy Initiatives Katie Hoeberling (katie@openenvironmentaldata.org), Research and Policy Manager Emelia Williams (emelia@openenvironmentaldata.org), or Data Inclusion Specialist Cathy Richards (cathy@openenvironmentaldata.org) with any questions.