

Statement of
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Committee on Science and Technology
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Good morning, Chairman Miller, Congressman Sensenbrenner and members of the Subcommittee on Investigations and Oversight. I thank you for this opportunity to appear before you today to present AFGE Council 238's views about the closure of EPA's libraries.

INTRODUCTION

My name is Charles Orzechoskie. I am President of the National Council of EPA Locals# 238 of the American Federation of Government Employees (AFGE). I have worked for EPA for over 37 years as a professional engineer in the construction grants program, facilities planning, and 208 plans under the Clean Water Act, and served as Chief of EPA Region 5's Wetlands Enforcement Program. Over 20 years of my EPA service has been as a supervisor, including two years on an Interagency Personnel Agreement to the Indiana Department of Environment Management as Chief of their Facilities Development Branch. I am a Licensed Attorney in the State of Illinois, and have been a Registered Professional Engineer in the States of Indiana and Illinois.

Additionally, I served two terms as the Vice President of the Illinois Society of Professional Engineers, and have been a member of both the American Bar Association and the Chicago Bar Association.

AFGE COUNCIL 238

AFGE Council 238 represents almost 9,000 employees of the Environmental Protection Agency (EPA) who are first and foremost, committed to the protection of human health and the environment, and ensuring that our nation's environmental acts, laws and regulations are carried out. AFGE Council 238's mission is to strive to improve workplace conditions so that EPA employees have the opportunity, support and tools needed to accomplish EPA's mission and advance in their chosen field and respective careers.

AFGE Council 238 does this as our employees' exclusive legal representative in national labor negotiations, and works to obtain agreements which provide our members with a supportive work environment and improved opportunities to work more effectively and efficiently for the protection of human health and the environment.

EPA'S MISSION AND WHY LIBRARIES ARE IMPORTANT

EPA's mission is to protect human health and the environment. To carry out that mission requires a deep understanding of environmental science and technology. EPA engineers, risk assessors, and scientists rely heavily on EPA technical information and have over the years utilized EPA libraries to perform their jobs in an effective and efficient manner. EPA library staff provide Agency professionals with the latest research on cutting-edge environmental, homeland security and public health issues.

In addition, EPA libraries conduct business searches for EPA inspectors, investigators, and enforcement officers, providing a host of other resources that cannot be found with a standard internet search. EPA technical library staff provide vital support services that allow EPA employees to spend more time conducting inspections, writing public health and environmental policies and reports, and enforcing and implementing EPA regulations.

EPA LIBRARY CLOSURES

Sadly, EPA library services are no longer available to EPA staff or the general public at two EPA Headquarters libraries and three Regional libraries (Region 5 in Chicago, Region 6 in Dallas, and Region 7 in Kansas City) - which serve 15 states. EPA libraries in Regions 1 (Boston), 2 (New York), 9 (San Francisco), and 10 (Seattle) have reduced hours. The closure of EPA Headquarters' Office of Prevention, Pesticides and Toxic Substances (OPPTS) library was a particularly severe loss to the public, research institutes, as well as EPA engineers, risk assessors, and scientists.

CLOSURE OF OPPTS HEADQUARTERS LIBRARY

The EPA Headquarters OPPTS Chemical Library was shut down on October 20, 2006. It provided research services to EPA scientists who review industry requests for the introduction of new chemicals into the environment. Among other holdings, the library contained unique toxicological studies on the potential effects of pesticides on children, up-to-date research on genetically engineered chemicals and other biotech products, and extensive literature on emergency planning and chemical risk assessments.

EPA scientists often begin their reviews by looking at the effects of similar chemicals or analogues – a technique hampered by closing the library housing research on chemicals and their effects. Headquarters EPA scientists now have fewer resources to conduct thorough analyses on hundreds of new chemicals for which companies are clamoring for “EPA approval.”

When it was closed, the OPPTS library’s valuable, paper-only collection was moved into boxes, and stored in a Headquarters basement cafeteria. EPA made no public announcement concerning its dismantling of the OPPTS Library, nor was it mentioned in the “EPA FY 2007 Framework” as one of the several libraries slated to be shuttered. It is a travesty that EPA closed this all important library critical to the Agency’s mission and the general public.

We concur with Leslie Burger, President of the American Library Association and Director of the Princeton Library, when she testified before the Senate Environment and Public Works Committee on February 6, 2007, *“In an age of global warming and heightened public awareness about the environment, it seems ironic that the Administration would choose this time to limit access to years of research about the environment.”*

WHY PUBLIC ACCESS TO EPA LIBRARIES IS CRUCIAL

Public access to EPA libraries is crucial because without it, organizations such as the Lake Michigan Federation may never have come into existence. While raising four children in Chicago's Hyde Park neighborhood in the 1950s and 1960s, Lee Botts became involved as a volunteer in several local issues leading up to taking a leadership role in the

campaign which in 1966 resulted in the creation of the Federal Indiana Dunes National Lakeshore. In 1971, Ms. Botts founded the Lake Michigan Federation. The Lake Michigan Federation was the first independent citizens' organization dedicated to the protection and preservation of a specific Great Lake. Part of the reason for Ms. Botts' success was her frequent visits to the EPA Region 5 library in Chicago. Today, the Lake Michigan Federation is known as the Alliance for the Great Lakes, and has been instrumental in the effort to restore the sixth largest lake in the world. EPA Region 5's library is now closed, so I am concerned for the new Lee Botts of this country who may not have access to a world-class environmental library.

IMPACT OF EPA LIBRARY CLOSURES ON STAFF

On February 6, 2007, EPA Administrator Stephen L. Johnson testified before the Senate Committee on Environment and Public Works, stating in part, *"We discontinued walk-in services at five of our 26 libraries and reduced the hours of operations at some other libraries. However, the services provided remain unchanged."* AFGC Council 238 does not understand Administrator Johnson's statement based upon the fact that there are no libraries in Region 5 (Chicago), Region 6 (Dallas), and Region 7 (Kansas City) or at EPA Headquarters, particularly the OPPTS library. In Chicago, the space is vacant; even the furniture has been sold. How have *"...the services provided remain unchanged..."*?

We surveyed some of our bargaining unit and they indicated adverse impacts due to the closure of the EPA Library in their location. High on the list of concerns and complaints was the loss of quick and direct access by EPA Ecologists, Environmental Engineers, Environmental Health Scientists, Environmental Scientists, Risk Assessors, and Toxicologists, among others, to EPA studies, reports, and reference materials. Many

of our top engineers, risk assessors and scientists find themselves either purchasing their own expensive reference texts, or spending time in university libraries that might otherwise be better spent if we had our libraries back.

High on the list of concerns in Chicago was the loss of the specialized reference materials for the Great Lakes National Program Office. Yet on February 6, 2007, EPA Administrator Johnson testified that, *“Let me also assure you that unique EPA material has been retained, catalogued, and is available to EPA and the public.”* Our bargaining unit employees tell us they cannot access some of these materials. Does EPA management know where all of the Great Lakes National Program Office material is? Can they assure us that ALL of the *“...unique EPA material has been retained, catalogued, and is available to EPA and the public?”*

Administrator Johnson also testified on February 6, 2007, *“EPA saw a decline in the walk-in traffic at many of our libraries,”* implying that the public’s demand for information had decreased. EPA libraries were used as repositories for information on Superfund Sites, among other things, which the general public has now lost access to in at least four major metropolitan areas (Chicago, Dallas, Kansas City and Washington, DC). The decline in walk-in traffic may be due in part to increased security measures at Federal buildings since 9-11. We also believe that EPA budget reductions in public outreach programs have contributed to a decline in walk-in traffic. However, I do believe that the general public’s interest in environmental issues is still strong. I am left with the question as to whether or not EPA wants walk-in traffic and a public engaged in environmental decision-making. If the Agency really wanted to find out what the public wanted or needed from EPA libraries, it should have publicly noticed its proposed

changes to library services AND held information sessions in the locations where the libraries were either going to be closed or the hours reduced.

EPA employees have already experienced significant decreases in the support necessary to maintain their ability to work effectively and efficiently due to decreases in travel and training dollars. Now with the decreases in networking support EPA libraries offered, their ability to perform their jobs has been further diminished. The loss of institutional memory, as well as the loss of expertise from professional librarians in the Regions, hampers the scientific decision-making process. The current Administrator maintains that he wants decisions that are scientifically based, yet the ability of EPA staff to accomplish sound science continues to be impaired. Is the real goal to have even more of the technical assistance and evaluations contracted out at higher cost to the taxpayer?

How much money can EPA possibly save by taking away reasonable access to newswires and reports that inform Agency technical staff of so many issues that impact EPA's mission, in a condensed and summarized form? The idea of taking away EPA staffs' easy access to important environmental journals is appalling. Certainly, it can be said that EPA's library plan was not based on an assessment of the end-users needs. On February 6, 2007, Leslie Burger testified, "*Is EPA's library plan based on the end users' needs? Apparently not...ALA doesn't see what's being done as connected to users' needs in any way.*" AFGE Council 238 agrees with Ms. Burger's testimony.

The Council tried to work with EPA management but was stonewalled. Management was apparently not interested in what the Agency engineers, risk assessors, and scientists had to say about EPA libraries. The Administration's action in shuttering EPA Libraries appears penny wise, pound foolish and a step backwards in protecting the

environment. Unfortunately, so many of the Administrator's decisions appear to be based on the President's Management Agenda, and not on the mandates of Congress, the will of the American people or what would be in the best interest of accomplishing EPA's mission.

AFGE COUNCIL 238 IS CONCERNED:

- Because the \$2 million budget cut for EPA libraries was proposed by the President and the Office of Management and Budget, but carried out without Congressional approval by EPA management. AFGE Council 238 believes that the EPA library closures reduces the effectiveness of EPA, and continues to demoralize its employees.
- About the sudden, draconian manner, in which EPA libraries were closed, with little regard to protection of unique collections of technical reports and documents, such as the Great Lakes collection. We consider it one more example of suppressing information on environmental and public health-related topics.
- Because we consider the EPA library closures to be an "environmental justice" (EJ) issue. At least four major metropolitan areas have lost EPA libraries – Chicago (Region 5), Dallas (Region 6), Kansas City (Region 7), and Washington, DC (Headquarters). It is an EJ issue because people of color and lower economic means have been impacted disproportionately by these library closures since they rely more heavily on publicly accessible services.
- In the interim, until digitization is completed, the ability of EPA to respond to emergencies may well be reduced because important reference materials are not

available or will take a significant time to be retrieved from storage or another library.

- That the public will no longer have convenient access to many of EPA's past reports and technical documents, even though EPA management has indicated that the public will get their information either from EPA hotlines, program staff (which would require a *Freedom of Information Act* or *FOIA* request), or from the EPA website.
- EPA management has assured Agency personnel and the general public that all documents will be available "on-line," for easy retrieval. Yet, EPA's own National Environmental Publications Information System has indicated that thousands of documents have yet to be "digitized."

EPA'S RATIONALE – TO PROMOTE INCREASED EFFICIENCIES

Senior EPA managers touted the message that the \$2 million budget reduction, and subsequent library closures, would promote increased "efficiencies," with virtually all EPA reports being available in an electronic format. These "savings" were illusory, and nothing could have been further from the truth. Here are some sobering facts regarding the EPA library closures:

- EPA's Office of Environmental Information (OEI), in a cost-benefit analysis completed in 2004 ("Business Case for Information Services: EPA's Regional Libraries and Centers," EPA-260-R-04-001, January 2004), estimated that EPA's library network saved Agency professional staff more than 214,000 hours - a cost

savings of approximately \$7.5 million. The benefit to cost ratio was conservatively estimated at 4.4-to-1. Despite this study indicating cost savings by maintaining these specialized environmental libraries, EPA shuttered those same libraries in a “cost savings” move. It is interesting to note that this report stated, *“Librarians are found to save professional staff as much as 16 hours “per question answered.” Patron surveys also suggest that librarians save professional staff approximately 1 hour “per document delivered.”* That adds up to huge hidden costs in wasted salary dollars when you multiply EPA staffs’ time to do their own library searches. The report even explains why this happens: *“Library patrons do not always come with well-formed questions or clearly articulated requests for specific information resources. Rather, research is frequently a joint venture between the patron and the librarian.”*

I find it pretty sad that Agency management apparently ignored this report in its frenzy to shutter EPA libraries. The Agency’s own report stated, *“Many of EPA’s mission activities entail the need for rapid and/or repeated access to relatively specialized collections of data, scientific information and methods, and legal and legislative information. Similarly, it is necessary for EPA scientists, economists, attorneys, financial analysts, and other professional staff to stay abreast of cutting-edge developments and state-of-the-discipline information. The establishment of these collections enable EPA professionals to save time during the research phase of their activities, to conduct rapid turnaround research projects in response to evolving events, and to complete research projects that might have been stymied were unique and appropriate references not immediately*

available.” The report concluded that EPA libraries were “...clearly a source of substantial value to the Agency, its stakeholders, and the public. Even employing the most conservative of assumptions, benefit-to-cost ratios for core library services indicate that libraries “give back” far more than they take in terms of Agency resources....”

As a result of the EPA library closures, we have literally thousands of EPA staff conducting their own library searches. This is not a cost-effective use of EPA employees’ time. We find the February 6, 2007, testimony of Ms. Leslie Burger particularly on point regarding the need for librarians when she stated, *“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. ... 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. When searching the EPA site, one retrieves thousands of hits for a topic such as “water.” When qualifying the search by a date range the results include items outside the date range. The user will wonder about the veracity of the data and will need the assistance of the librarian.”*

- Some of EPA's library collections were dispersed without establishing any standard procedures or criteria to ensure that important documents were not lost. For instance, the EPA Region 5 library in Chicago closed on September 30, 2006, and its collections were offered to other libraries. Ms. Leslie Burger in her February 6, 2007, testimony stated *“What this “dispersment” entails isn’t exactly clear at this point and what concerns us 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.” Can EPA management account for ALL of the documents and materials from, for example the Great Lakes collection?

- The National Environmental Publications Information System, EPA's repository of electronic documents, currently holds over 25,000 documents. But the Agency has thousands more documents that should be retained; most of these are not yet available in any electronic format. EPA management has not addressed the issue of how much it will cost to digitize these thousands of reports, where the money will come from, or how long it will take to complete the task.
- EPA's approach did not consider how university, school, and municipal libraries will borrow paper copies of EPA's documents through the inter-library loan process.
- EPA's approach has deprived working-class people of a user-friendly, well-staffed EPA library system that could provide them with environmental and public health information.

MODERNIZATION OF EPA LIBRARIES

EPA management has stated that shuttering its libraries was an act of modernization. As the saying goes, “the devil is in the details.” If AFGE Council 238 had been tasked with modernizing EPA’s libraries, we would have first consulted with the experts such as the American Library Association, the Association of Research Libraries, and the American Association of Law Libraries. We would have

acknowledged upfront that not all parts of each EPA's library collection could be digitized, since much of it is copyrighted. We would have acknowledged the abundance of specialized and unique materials to the EPA collection – including reports paid for by taxpayers, maps and other specialized formats, which would be and are very difficult and time-consuming to digitize.

Ms. Leslie Burger stated on February 6, 2007, *“Before we begin the costly digitization process, we always consider the needs of the current and future user communities. Digital content must be created in a fashion assuring that it will be usable 25 and 50 years from now. We need to capture cataloging information, or what we call metadata, about the digital resource so that we can find the digital object now and in the future, or so that if we have to recreate it we know how we created it the first time.”*

Second, if we were tasked with digitizing EPA library materials, we would have piloted the project; testing it out and discovering problem areas and processes, as well as procedures that would need to be followed to ensure accuracy and completeness of the digitization process. Third, we would have ensured that all materials had first been digitized and made available electronically, and only then would we have considered whether the redundancy of hard copies was necessary or in the best interest of the general public. All this and more we would have done prior to declaring “mission accomplished,” shuttering EPA's libraries, and tossing out documents – which in fact is what EPA did when it shuttered its libraries.

Despite Administrator Johnson's testimony that *“...our library modernization effort has and will continue to provide more people with more access to EPA information, both online and through traditional library services,”* feedback from

bargaining unit employees has indicated just the opposite. To date EPA's modernization effort has not provided more people with more access to EPA information.

AFGE COUNCIL 238'S RESPONSE TO EPA'S LIBRARY CLOSURES

Administrator Johnson testified on February 6, 2007, "*We also plan on continuing a strong network of physical libraries. Some will serve as repositories to hold hard copies of our collection and some will continue to provide walk-in services.*" The Agency's actions in closing EPA libraries, reducing hours at other libraries and how they went about accomplishing those changes were the reasons we wanted to sit down and negotiate with EPA management and find a solution that would be in the best interest of EPA and the employees we represent.

AFGE Council 238 tried to have an impact on this issue internally by negotiating with EPA management. Senior Agency management rebuffed the Council, saying that the topic was "premature" to negotiate because no formal FY 2007 library plan had yet been adopted. On March 13, 2006, the EPA Region 5 Regional Administrator announced that the Region 5 Library would close "*...in the near future.*" Therefore, on March 16, 2006, AFGE Council 238 demanded to bargain procedures and appropriate arrangements over the closing and major reorganization of EPA's libraries. In spite of AFGE Council 238's Demand to Bargain, EPA management went ahead with its dismantling of EPA libraries unchecked, with no coherent plan in place.

On August 16, 2006, AFGE Council 238 filed a grievance against the Agency for failure to negotiate with the Council over the closure of the libraries. Since the Agency

made no real effort to resolve the grievance, on October 17, 2006, AFGE Council 238 invoked arbitration. On February 5, 2007, the Council filed an Unfair Labor Practice (ULP) with the Federal Labor Relations Authority (FLRA) because the Agency refused to pick an arbitrator. On September 25, 2007, FLRA Administrative Law Judge Richard A. Pearson ruled on the ULP and ordered the Agency, among other things, “...to cease and desist from ... Failing or refusing to proceed to arbitration...” and “...in any like or related manner, interfering with, restraining or coercing its employees in the exercise of their rights assured by the Federal Service Labor-Management Relations Statute.” The September 25, 2007, FLRA Order also required EPA to post at its facilities where bargaining unit employees represented by the Council are located, copies of a notice to all employees that the EPA had committed a ULP and their agreement to abide by the FSLMRS. EPA management has dragged its feet complying with FLRA’s Order to post the settlement agreement nationwide. AFGE Council 238 continues to work with FLRA to resolve this matter.

Coincidentally, on September 25, 2007, the arbitration was heard by Arbitrator George E. Larney. On February 15, 2008, Arbitrator Larney found that the Agency had violated applicable provisions of the Master Collective Bargaining Agreement (MCBA) when it acted to forestall and preclude engaging the Council in impact and implementation bargaining pertaining to issues attendant to the reorganization of its Library Network. The Arbitrator ruled to sustain the substance of the grievance and ordered the Agency to engage the Council in impact and implementation bargaining over issues attendant to the reorganization of the Agency's Library Network in a timely manner. Such bargaining should include all issues that directly affect and may

potentially have an adverse impact on the working conditions of bargaining unit employees. Arbitrator Larney stated in his ruling last month, *“Thus, the record evidence establishes with great clarity and without contravention that from the very beginning of its initiative in FY 2003, to consider making changes to its Library Network and continuing up until midway through FY 2006 when the Agency began laying the groundwork to effect the changes that had already been determined by it to implement, Management had precluded the Union, both on a national and local level, from assuming any role in the planning and decision-making stages relative to the reorganization of its Library Network and, consideration of the possible potential impacts such a reorganization would have on its bargaining unit employees.”*” [p. 60 of 81, February 15, 2008, OPINION and AWARD, EPA v AFGE Council 238 (FMCS Case No. 07-50725)]

Arbitrator Larney went on to state that *“...the record evidence reveals that the Agency stonewalled the Union with regard to permitting commencement of negotiations let alone allowing the Union a real and viable consultative role in the library reorganization process....”* [p. 61 of 81, February 15, 2008, OPINION and AWARD, EPA v AFGE Council 238 (FMCS Case No. 07-50725)]

Arbitrator Larney continued by stating *“...As if the Agency’s conduct as evidenced by the above enumerated four (4) instances was not bad enough, the fact that, in addition to precluding the Union from entering into impact and implementation bargaining pursuant to its contractual right to do so as provided for in Article 45 of the Master Collective Bargaining Agreement (Jt.Ex.1), pertaining to the reorganization of its*

Library Network, the Agency compounded the err of its ways by instituting changes attendant to its reorganization initiative unilaterally without the benefit of legitimate Union input. Such unilateral changes were implemented over much of the time period the Union was seeking to enter into impact and implementation bargaining with the Agency up to and including the period of time leading to this arbitral proceeding.”

[p. 66 of 81, February 15, 2008, OPINION and AWARD, EPA v AFGE Council 238 (FMCS Case No. 07-50725)].

As of this date, we have not yet been able to schedule a meeting with the Agency to discuss this ruling or Arbitrator Larney’s Order. AFGE Council 238 is concerned that EPA’s actions tend to limit not only EPA staffs’ access to information, but also discourages the public’s access to EPA libraries and information.

NATIONAL PARTNERSHIP COUNCIL

On April 14, 2003, Administrator Christine Todd Whitman signed the “EPA Labor-Management Partnership Strategic Plan and Operational Guidance,” which stated, among other things that: *“The overarching goal of the Partnership Council is to increase collaboration between EPA’s labor unions and management thereby furthering the accomplishment of the Agency’s mission through improving job satisfaction and working conditions for all employees and managers at all organizational levels and locations.”* The Strategic Plan stated that: *“Rather than having management make decisions and then negotiate with the union, the PDI process involves the union early in the decision-making process, when issues are at the formative stage. When PDI is used,*

the union and management work together as a team to resolve issues to their mutual satisfaction and interest.”

EPA management not only repeatedly refuses to adopt the principles of pre-decisional involvement (PDI), but also refuses to engage the unions in meaningful negotiations such as library closures, even though they are required to do so by law and contract. For at least six years, EPA management has repeatedly said that it wanted to engage Unions in PDI as part of the NPC activities. Yet as of this date, AFGE Council 238 is unaware of any PDI activities emanating from the NPC, despite numerous requests.

As a result of the failure of EPA management to work with us on the library closures, as well as on a multitude of other issues, AFGE Council 238 served notice on February 28, 2008, along with our Union partners, that we were suspending any further involvement with the National Labor-Management Partnership Council with EPA management. AFGE Council 238 is particularly incensed by EPA’s refusal to discuss, let alone negotiate with us on the closure of EPA’s libraries.

SOME OF THE LOWLIGHTS OF EPA’S LIBRARY CLOSURES INCLUDE:

- EPA's library collections were dispersed before establishing any standard procedures or criteria to ensure that important documents were not lost.
- EPA did not have a complete inventory of all documents prior to the closures, nor do we believe that they have one now. Can EPA management account for the whereabouts of ALL unique library documents prior to the day of shuttering?

- EPA's approach to closing its libraries has deprived working-class people of a user-friendly, EPA-staffed library system that provided them with environmental and public health information. The general public, particularly minorities in four major metropolitan areas have been impacted – Chicago, Dallas, Kansas City and Washington, DC.
- AFGE Council 238 finds it ironic that EPA shuttered its libraries when its congressionally mandated mission is to protect human health and the environment; a scientific and legal mission that requires ready access to the latest research and information in the many scientific and technical fields.
- EPA failed to fulfill its contractual obligations under the MCBA, as well as its statutory obligations under the Federal Service Labor-Management Relations Statute (5 U.S.C. 7101 *et seq.*), by failing to negotiate with AFGE Council 238 on these closures.

CONCLUSION

EPA policy makers, managers and senior executives should depend on impartial, peer reviewed research and science to make informed decisions. A valuable resource and research tool is a first class EPA Library Network. AFGE Council 238 would like to see all EPA libraries reopened and library services fully restored by the end of fiscal year 2008.

AFGE Council 238 thanks Congress for providing \$1,000,000 (\$983,500 after rescission) in the fiscal year 2008 budget to reopen the closed EPA libraries. However, we are concerned that the funding may be insufficient to get all of the closed libraries

back to full service, and will not address the reduced service at the remaining libraries, nor the reduced periodical subscriptions. Unfortunately, much of the funding will need to be spent on construction and repurchasing library furnishings, such as shelving. For example, EPA Region 5 excessed its library furniture in 2006, selling it for about \$350. That furniture was originally purchased in 1990-1991 for approximately \$35,000, and to replace that furniture now in 2008 could easily approach \$100,000.

Most importantly, AFGE Council 238 points out that there was no funding to rehire research librarians, a critical aspect of any library, let alone a state-of-the-art environmental library. Ms. Leslie Burger appears to support this position when she stated on February 6, 2007, *“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?”*

AFGE Council 238 believes that reopening EPA libraries will require aggressive oversight by Congress to ensure that the Agency successfully reopens and restores them in a timely and effective manner. We urge Congress to include explicit instructions that funding must be used to reopen shuttered EPA libraries. AFGE Council 238 is also

concerned that authorizing the reopening of EPA libraries to provide public access should include providing EPA staff with ready access to the latest research and information in their respective scientific and technical fields.

AFGE Council 238 offers its services to Congress to review and comment on the plan that EPA is required to submit to the Committee on Appropriations regarding actions the Agency will take to restore publicly available libraries to provide environmental information and data to each EPA region. The Agency is to submit its report to Congress within 90 days of the signing of the appropriations bill on December 26, 2007.

We are also concerned about EPA's library closures since it appears to be a phenomenon not restricted only to EPA. Library closures are, in fact, happening at other Federal Agencies and Departments. For example, the National Institute on Drug Abuse closed its library in 2007 for "budgetary reasons." The Housing and Urban Development Headquarters Library was decreased in size by 60 percent; periodicals and monograph materials were reduced by over 16 percent. The General Services Administration Headquarters library closed in October 2006. We understand that at the U.S. Geological Survey, budget constraints have created concerns about the future of their library services as well.

Finally, I must state that in my over 37 years as a dedicated Federal civilian employee, I have never experienced such an unprecedented level of political consideration in the performance of EPA's mission. I express my sincerest concern that this political influence threatens the integrity of EPA's Principles of Scientific Integrity, and undermines the very mission of the Agency, which is to protect human health and the

environment. EPA must make decisions based upon the best reasonably obtainable economic and technical information, as well as sound science that has been peer reviewed. By initiating these changes now, it would not only improve EPA staff morale, but also help accomplish EPA's mission and strengthen the faith of the American people in this world-class Agency.

Thank you again for this opportunity to speak on behalf of AFGE Council 238 and the almost 9,000 EPA employees that we represent. I am happy to take any questions from the Committee.

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