

however, the editors missed an opportunity to counterbalance the excellent introductory chapters with an epilogue.

Digital Preservation Metadata for Practitioners is a practical guide to selecting, using, and managing metadata vital to the long-term preservation of digital objects. In the past thirteen years since the Data Dictionary was first released, PREMIS has become the de facto standard for preservation metadata, thanks in large part to the work of the editors of this book. PREMIS is a resilient standard that has grown and adopted to changing practices and challenges in the digital preservation field and that remains connected to its community of practice. Preservation metadata can be as unique as the content it describes, and Dappert, Guenther, Peyrard—in collaboration with their knowledgeable contributors—do an excellent job addressing the nuance in an approachable and pragmatic fashion.

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Environmental Information: Research, Access and Environmental Decisionmaking

By Sarah Lamdan. Washington, D.C.: Environmental Law Institute, 2017. 342 pp.
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The regulatory landscape is not terrain often visited by archivists, despite the fact that it produces a stunning variety of records, documents, and data. One of the most highly contested areas of regulation and deregulation is the environment. Navigating the information associated with environmental regulation is difficult for specialists, let alone interested members of the public. Given the confusion and complexity of this area, Sarah Lamdan's *Environmental Information: Research, Access and Environmental Decisionmaking* stands out as a critical guide.

I have an existing collegial relationship with Lamdan, as we have overlapping interests concerning the environment, climate change, archives, and recordkeeping. She is a law librarian at the City University of New York School of Law and has published on the implications of Freedom of Information Act (FOIA) access to environmental information. In addition to her training as a librarian, Lamdan attended law school and specialized in environmental law. Having previously worked in law firms, and now as a university law librarian, her writing is authoritative and illuminating in helping nonlawyers understand how to identify, access, and locate environmental information. The volume

is a unique contribution to a conversation more frequently found within law reviews or on environmental advocacy websites.

Environmental Information is arranged into several thematic and instructive chapters. The book is primarily concerned with environmental information, data, and records created, collected, or mandated due to federal laws and regulations. Lamdan starts with a broad overview of environmental law, basic legal research methods, and the major environmental laws that mandate creation and collection of environmental information. The middle of the book considers FOIA, other open records and meetings laws, and the rule-making process. The final chapters consider unusual sources of environmental information, state and local environmental information access, and the context of international and foreign law. The book is illustrated by several helpful graphics and charts that present unwieldy information in understandable formats.

A major challenge of locating environmental information is that data, documents, and records pertinent to a given topic may be found in both the private and public sectors. Within the public sector, environmental information may be found in local, state, and federal agencies. For this reason, Lamdan spends chapters 2 and 3 (“Overview of Environmental Law” and “Researching Environmental Law”) reviewing cooperative federalism, statutory authorities of major environmental laws, and basic legal research methods. It is critical to know which agencies have authority to regulate which issues. For instance, the Clean Water Act is a federal law overseen by the Environmental Protection Agency (EPA), which delegates much of its program implementation to the states. Therefore, if I were concerned about pollution in the Miami River, I would work with the Ohio Environmental Protection Agency, the entity with the authority to administer the Clean Water Act at the state level. However, not all water issues are covered by the EPA. For example, the Army Corps of Engineers handles issues related to dredging navigable bodies of water. Understanding which agencies are responsible for which issues and in which jurisdiction is the first major step in identifying the appropriate source for relevant information.

Chapter 4, “Environmental Laws and Information Access,” describes the basic access provisions associated with the most prominent environmental laws. Chapters 5 and 6 (“Environmental Information and the Freedom of Information Act” and “Federal Transparency Laws Beyond FOIA”) move on to a detailed look at the techniques of accessing federal agency environmental information. Users of environmental information have two methods of access: finding information via proactive disclosure (i.e., information shared through government websites or publications), or public records requests facilitated by transparency laws, such as FOIA. As FOIA is one of the most prominent recordkeeping laws in existence, these chapters serve as an excellent refresher for archivists on its history, importance, and limitations.

FOIA has provisions requiring proactive disclosure of certain groups of records, including “general information about agency organization and process, final administrative adjudication orders and opinions, agency guidance materials (policy statements and interpretations adopted by the agency but not published in the *Federal Register*), administrative staff manuals and instructions to staff that affect the public, and copies of all records that have been released via previous FOIA requests” (p. 113). FOIA does not dictate that *all* agency information is subject to request. For example, corporations can mark information they are legally required to disclose to agencies as confidential business information, thus shielding it from subsequent FOIA release. Lamdan describes the major exemptions to FOIA disclosure and outlines best practices for filing a successful FOIA request. No central FOIA portal exists for filing or reviewing previous requests from all agencies. However, several agencies, including EPA, participate in a government website called FOIAonline. FOIAonline allows users to file FOIA requests, search previous requests, and run reports (such as the backlog at each agency). Users seeking information from agencies that do not participate in FOIAonline will have to review each agency’s guidelines for how to submit a request (p. 113).

In addition to FOIA, lesser-known laws affect public access to information and records. Lamdan considers laws covering federal meetings (Sunshine Act and Federal Advisory Committee Act); the creation, management, and quality of federal records and information (Federal Records Act, Presidential Records Act, Federal Information Quality Act, and Paperwork Reduction Act); and laws that restrict access (records classification, regulatory national security exemptions for energy infrastructure information, and the Privacy Act). These laws can sometimes complicate access to records, even those originally passed to encourage transparency. For example, federal open meeting laws do not apply to all agencies equally; the Sunshine Act does not apply to meetings of agencies headed by a single secretary, like the EPA (p. 143). The Federal Records Act limits the ability of private citizens to file suit if records are “wrongfully removed from government custody” (p. 154). Several exemptions to information availability have been passed since 9/11 in the name of domestic security.

One of *Environmental Information’s* most valuable sections (chapter 7, “Rulemaking Documents”) concerns the federal rulemaking process. Rulemaking is a major component of the regulatory process, and regulations provide the specificity for how congressional laws (statutes) and presidential executive orders will be carried out. Since environmental legislation is “broad and overarching” (p. 67), this means that agencies must develop significant regulations (rules) to implement laws. Lamdan writes, “The rulemaking record is especially important as most federal environmental laws require federal agencies to create regulatory programs, processes, and projects to grapple with conservation and pollution

issues" (p. 169). There are several stages in the rulemaking process, each with varying levels of transparency and disclosure. This chapter details the methods by which users can access the voluminous records associated with the rulemaking process, many of which are rich sources of information relevant to public interest.

Chapter 8, "Grey Literature," considers environmental information created by agencies without an explicitly environmental mission (for example, Securities and Exchange Commission filings that disclose corporations' environmental impacts) and additional sources such as court rulings, congressional hearings, and nongovernmental organizations' research. Lamdan recommends basic starting points for research at local and state levels (chapter 9, "State and Local Environmental Information Access"), as well as the laws of other countries, and international law (chapter 10, "Finding Environmental Information in Other Countries"). The book concludes with a brief guide (chapter 11, "Making Sense of Environmental Information") on how to synthesize the highly technical content found in environmental information.

Environmental Information has two weaknesses. The first is that it should include more discussion of environmental information associated with agencies beyond the EPA, particularly the energy sector. Lamdan acknowledges this early in the book, noting "Despite the EPA-heavy nature of this book, be aware that EPA is not the sole agency dealing in environmental matters" (p. 6). Much of the environmental information collected by the EPA is related to conservation and pollutants. Agencies outside of the EPA are responsible for supporting economic and energy development with significant environmental impacts, especially within the context of climate change. For example, the Federal Energy Regulatory Commission (FERC) regulates major interstate oil and gas pipeline projects.¹ Many environmental information seekers want to monitor not only the after-effects of industrial infrastructure (i.e., air and water pollution), but information about the permitting and construction of such infrastructure in the first place. As the "keep it in the ground" climate movement to end all new fossil fuel development accelerates, information concerning the development and transmission of energy is just as critical as information concerning pollution.

The second issue is that much of the book concerns what archivists might consider "active records."² Lamdan largely ignores the role of NARA within the federal recordkeeping environment, except beyond its role in carrying out the Federal Records Act and the Presidential Records Act (pp. 152–55). Some seekers of environmental information may need to access inactive records that have been subsequently transferred to NARA custody, and unfortunately the book offers little guidance on how to access records at NARA repositories.

Following the 2016 election, public interest in federal environmental information, data, and records has increased. This culminated in many "data rescue"

efforts that saw scholars, activists, librarians, and archivists downloading and saving federal agency websites and datasets. Public interest groups, like DataRefuge and Environmental Data and Governance Initiative (recipient of the Society of American Archivists' 2017 J. Franklin Jameson Archival Advocacy Award,³ and with which Lamdan has previously worked) have continued to raise public awareness about federal environmental data governance issues. As archivists consider how recordkeeping affects all facets of civil society, *Environmental Information* is an essential guide for both information professionals and the general public in these tumultuous times.

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NOTES

¹ While many of FERC's records are exempted from FOIA and only partially disclosed under the Critical Energy Infrastructure Information policy (pp. 163–64), many other FERC records are available at <https://elibrary.ferc.gov/>.

² Richard Pearce-Moses, *Glossary of Archival and Records Terminology*, s.v. "active records," Society of American Archivists, <https://www2.archivists.org/glossary/terms/a/active-records>.

³ "J. Franklin Jameson Archival Advocacy Award Recipients," Society of American Archivists, <https://www2.archivists.org/governance/handbook/section12-jameson>.

Displaced Archives

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In Shakespeare's *Hamlet*, the prince of Denmark intones: "Ay, thou poor ghost, While memory holds a seat / In this distracted globe. Remember thee? / Yea, from the table of my memory / I'll wipe away all trivial fond records, / All saws of books, all forms, all pressures past."¹ In *Displaced Archives*, James Lowry, a lecturer at the Liverpool University Centre for Archive Studies, assembles a tested troupe of academics, who, in a series of twelve penetrating essays, analyze the problematic and pressured past of displaced archives caused by military conflict and European colonialism. Lowry asserts that the complex dilemmas caused by this pressured past of archival displacement make attempts to arrange the chapters according to such general categories as technical, theoretical, or legal issues lead only to artificial divisions. The chapter arrangement, he declares, therefore, is loosely structured, and both cross-references and footnotes have been supplied