Dear friends,

This year marks my third year as Executive Director of Public Employees for Environmental Responsibility. During these three years, I have been consistently amazed at how productive and valuable PEER is as an organization. This effectiveness is due to the passion and deep knowledge of our team and supporters, and the unique role that PEER plays in the environmental, public health, and public lands movement.

I trace PEER’s continuing effectiveness back to its unique founding principles of helping public employees speak the truth, protect science, and stand up to powerful economic interests to protect the environment.

These principles were on display back in the 1980s when Forest Service managers asked one of PEER’s founders, Jeff DeBonis to change his “biological opinion” on an upcoming timber sale because it “sounded” like the comments from the environmental community. Although he changed his comments, he gave original draft to a local conservation group. Convinced he would be fired, Jeff came out openly against Forest Service clearcuts and urged his colleagues to join him. Thousands did, and from Jeff’s original act of defiance, the Association of Forest Service Employees for Environmental Ethics (AFSEEE) was born. Soon AFSEEE had requests for help from government employees coming from beyond the Forest Service. In 1992, PEER was formed from this growing demand for an organization supporting employee activism and providing legal counsel to environmental whistleblowers.

Over the past 29 years, PEER has grown, evolved and changed, while staying true to its founding principles. We have remained an assertive, non-partisan watchdog, relentless in our mission to expose corruption and wrongdoing.

So, where do we see ourselves headed in the next ten years? Accelerated climate change, biodiversity loss, and increased levels of toxic pollution in our environment all point to the need for engaged employee activism and organizations that are unafraid to challenge government actions. That is why we will continue our work with renewed vigor and sense of purpose. We want to make sure the activism and courage that led to PEER’s founding remain as relevant as ever.

Timothy Whitehouse
Executive Director
PEER MISSION STATEMENT

PEER supports public employees who protect our environment, natural resources and public health. We work with environmental and public health professionals, land managers, scientists, enforcement officers and other current and former civil servants dedicated to upholding environmental laws and values.

PEER is partnering with the Center for Biological Diversity, the Global Indigenous Council, and a coalition of 25 other Native American, conservation, and animal welfare groups to pressure the Department of the Interior to stop the flow of federal funds that support the senseless slaughter of large predators, including wolves.

STAFF

Tim Whitehouse, Executive Director
Paula Dinerstein, General Counsel
Peter Jenkins, Senior Counsel
Kevin Bell, Staff Counsel
Hudson Kingston, Policy and Litigation Attorney
Monica Mercola, Legal Fellow
Claire Turner, Donor Outreach Associate
Helen Jenkins, Director of Development and Communications
Elizabeth Duan, Communications & Office Associate
Kyla Bennett, Director of Science Policy and Northeast and Mid-Atlantic PEER
Chandra Rosenthal, Director, Rocky Mountain PEER
Jeff Ruch, Director, Pacific PEER
Barry Sulkin, Technical Consultant
Jerry Phillips, Director, Southeast and Gulf Coast PEER

BOARD OF TRUSTEES

Louis Clark, Chair
Christine D. Berg, M.D.
Frank Buono
Darrell Carrington
Zoe Kelman
Ben Lomeli
Edward Patrovsky
Richard G. Steiner
Tim Whitehouse

GROWTH, EVOLUTION, AND CHANGE
Supporting Whistleblowers—We use whistleblower and other laws to defend public employees who get into trouble for protecting the environment. At PEER, we know that retaliation against whistleblowers is widespread and poses a significant barrier to government accountability.

Shining the Light—Too often agency officials and elected leaders try to withhold information from the public. PEER works with government employees, usually anonymously, to address issues through official channels and to bring hidden information into the light of day. We file document requests, conduct employee surveys, advocate for policy and regulatory reforms, issue press releases and background papers, and publish documents that the government wants to keep hidden. A transparent government is good for the environment.

Improving Laws and Regulations—Issues such as climate change, species collapse, and toxic pollution are becoming increasingly urgent, while political leadership remains unwilling to boldly pursue needed reforms. That is why PEER engages in litigation and administrative processes not only to protect the rights of employees, but also to ensure the application of science and sound policy to decision-making, the enforcement and implementation of environmental laws, and the protection of our planet for future generations.

Working Together—Lasting change requires collaboration. PEER fills a unique niche as a liaison to employee-activists, that allows us to partner with other groups on projects and litigation. We also provide advice and counsel to non-profit organizations on issues within our areas of expertise.

“As an attorney with over 20 years of experience, it was at PEER where I found a fascinating variety of cases and clients with compelling stories. Our clients are our experts and our guides. They are the ones who know their agencies inside and out, and are the ones who have a deep knowledge of the issues we work on. It’s with their help and collaboration that we are able to achieve so much in environmental protection. Because of them, there is never a dull day at PEER.”

Paula Dinerstein, General Counsel
Whistleblower File: Evi Emmenegger

For nearly 30 years, PEER has provided legal representation for government scientists. Few have been as courageous and conscientious as Eveline (Evi) Emmenegger. Evi is a microbiologist, working for the U.S. Geological Survey in its Seattle-based Western Fisheries Research Center (WFRC). For more than a decade, she managed its highest biosafety level containment laboratory studying aquatic pathogens. In recent years she became increasingly concerned about maintenance and equipment failures at WFRC that threatened external release of deadly viruses and in some cases endangered the health of both researchers and research subjects.

In late 2017, Evi discovered that the lab had been releasing pathogen-contaminated wastewater into the wetland adjoining Seattle’s Lake Washington over a period of six months. This had gone undetected because the lab’s chlorination system had broken down, but lacked an alarm to indicate the breakdown. This breach compromised research results and may have spread dangerous diseases to local aquatic life.

Evi felt both legally and morally compelled to report the violations to the state and file a Scientific Integrity complaint against managers at WFRC. She contacted PEER for help. For months, USGS ultimately dismissed her complaint because, while conceding that “science produced at WFRC may have been adversely affected,” there was no “intentional misconduct.”

That 2019 dismissal triggered a new downward spiral of reprisal familiar to many whistleblowers. After removing Evi from committees and prohibiting her from inspecting lab equipment, the same supervisor cited in the complaint began a process for her removal. The fast-track dismissal process ordered by ex-president Trump has since been repealed by President Biden. On her behalf, PEER challenged the basis for the proposal by pointing out the clear retaliatory motives behind it.

In March 2021, the presiding official issued a decision to remove her in March 2021. PEER filed another challenge with the U.S. Merit Systems Protection Board (MSPB). Then, something very unusual happened: USGS threw in the towel. USGS reported to the MSPB that her removal had been “rescinded,” her record cleared, she was awarded back pay, and returned to work. Once Evi went back to work, she found herself without a working computer, her official email address deactivated, no working keys or entrance codes, and her lab closed with no reopening date. Furthermore, she had no permission to resume research, and faced new fundraising requirements.

Never Giving Up

PEER has gone back to the MSPB to seek restoration of all her prior work conditions. Unfortunately, another, even larger issue remains—the agency has not improved its biosecurity practices, meaning that the same safety issues for which Evi risked her career could recur. Since USGS labs are not subject to outside accreditation, it cannot be held accountable for biosecurity lapses. To remedy this, Evi is working with PEER to persuade Congress to require that USGS submit to outside accreditation as other federal science agencies already do. So, while Evi’s employment case is almost concluded, PEER will not be leaving her side until all of her concerns are addressed.
Whistleblower File: The Case of Colorado

Colorado suffers from severely degraded air quality as urban areas are on track to experience the most ozone spikes in over a decade. PEER is working to address the critical air quality by advocating for stronger regulations on coal plants, oil refineries, and highway expansions, particularly in low-income areas.

Currently, PEER represents three state employees in their fight to reform the state air permit division. The employees are modelers, who use critical assessments under the National Ambient Air Quality Standards, as required by the Clean Air Act, to review permit applications and predict the amount of pollution that an applicant will emit. The process, when it works, may lead to requirements that an applicant—most often an oil and gas company looking to open a new well—allocate additional funds to address production and pollution concerns. Rather than enforce requirements, Colorado’s air program has been in the habit of asking modelers to overlook violations or modify their findings so that industry can continue to operate without restriction.

Since management declined to change their practice, three current and two former state employees came to PEER. PEER filed a complaint with the Environmental Protection Agency presenting 11 examples of permits that had been improperly granted. This complaint generated extensive media and public outcry, which resulted in a special investigation by the Special Assistant Attorney General. The investigation found conflicts of interest and inadequate policies in the state’s air permitting program. PEER is monitoring the situation closely and looking forward to true reform at the agency.

Correcting EPA’s Failed Pesticides Program

Did you know that more than two billion pounds of pesticides are sold annually in the United States and that the EPA has registered more than 18,000 different pesticide products—far more than any other country?

That poses a problem because pesticide exposure has been linked to cancer, endocrine disruption, reproductive effects, neurotoxicity, kidney and liver damage, birth defects, and developmental changes in a wide range of species, including humans, bees and birds. To make matters worse, EPA routinely approves toxic pesticides because of industry lobbying and political pressure and suppresses the opinions of its scientists that raise human health and environmental concerns.

To change this dynamic, PEER has organized 38 groups to urge the Biden administration to adopt reforms within EPA’s pesticide office. PEER and our partners are calling for systematic changes and have listed twenty outcomes we expect EPA to achieve in the coming year. We won’t let up in our effort to prioritize human health and the environment over pesticide industry profits in 2022.
Whistleblower File: Scientists at the EPA

Scientists are the backbone of the EPA’s ability to protect us from toxic pollution, which is among the agency’s core functions. This is especially critical for vulnerable populations such as pregnant people, children, the elderly, workers that handle chemicals, and people who live near industrial facilities. That is why recent revelations by five EPA scientists have been so shocking. The scientists, represented by PEER, have made a series of disclosures to Congress and the EPA’s Inspector General highlighting how industry has thoroughly co-opted EPA’s chemical risk assessment program. Our clients have disclosed that both during and after the Trump administration, EPA managers routinely accessed completed chemical risk assessments to:

- Delete language identifying potential adverse effects, including developmental toxicity, neurotoxicity, mutagenicity, and/or carcinogenicity;
- Prioritize cases and make changes when industry submitters are upset with identification of chemical hazards or when politicians contacted EPA on behalf of industry; and
- Reassign risk assessments to inexperienced employees in order to secure their agreement to delete sections of the assessments that would be protective of human health.

These whistleblowers have also detailed how managers routinely lean on and intimidate staff to reach certain conclusions, and how key managers move back and forth between jobs at EPA and the chemical industry. All of this with scant revolving door or conflict-of-interest scrutiny. Of even greater concerns is the manner in which this malfeasance has trickled down from political appointees and career employees.

That is why our clients felt they had a moral duty to step forward and tell their story at great personal and professional risk. With tremendous support from scientists both in and outside the agency, these brave scientists have prompted EPA’s Inspector General to launch a widespread investigation that is currently ongoing. In the coming year, we will be with them every step of the way, working to protect scientific integrity, reform the chemicals program, and ensure that there are consequences for those who commit scientific malfeasance at EPA.

PEER Board member Rick Steiner, an international conservation and sustainability expert, admires PEER’s tenacity and determination in fighting for their clients.
In August 2021, the Intergovernmental Panel on Climate Change (IPCC) issued a “code red for humanity” detailing how human actions are causing the earth to warm and the catastrophic consequences that will result if we don’t act now. That is why PEER has stepped up its efforts to support approaches to reducing greenhouse gas emissions, protect nature and biodiversity, and improve our agricultural practices, all of which are essential to protecting our climate.

Our country needs strong federal climate legislation and policies, and federal agencies will need the capacity and workforce to implement them on the ground. This is especially true at federal land agencies such as the Bureau of Land Management (BLM), which has long favored the oil, gas, and livestock industries over conservation efforts. Federally owned lands currently contribute about 23 percent of the entire nation’s carbon dioxide emissions, though with proper management, public lands can become sinks for greenhouse gas emissions. To engage agency staff on this and other critical disconnects facing the BLM today, PEER conducted an agency-wide survey which concluded in the 2021 Bureau of Land Management Employee Survey Report. Survey participants identified obstacles including staffing shortages and turnover; political influence and corruption; disparate enforcement of the law; lack of transparency and the dwindling use of science; retaliation and employee intimidation; and inching extremism. In the coming year, our job is to make sure the BLM addresses these obstacles by adopting the internal reforms that their staff recommends and becomes an agency that can be trusted to protect our climate, nature, and biodiversity.

We also know that federal agencies, such as the National Park Service, will need to green their operations. One way they can do this is to reduce their plastic waste: our national parks are drowning in a rising tide of plastic waste and plastics production is a significant contributor to climate change. We petitioned the National Park Service to ban the use of single-use plastic water bottles in parks, reduce plastic waste in parks by 75 percent, and ensure that there are adequate sources of free potable water available for park visitors. Our petition, organized with Green Latinos and Beyond Plastics, has resulted in thousands of signatures and meetings with National Park Service leadership to plan a path forward.

Keeping the Climate Conversation Honest

Fighting Climate Scams

The climate crisis has given rise to scams, both in federal and state programs. We are determined to expose these scams. Our report, It’s Time to Clean up Maryland’s Clean Energy Program: Dirty “Renewables” Cost Maryland Money and Jobs, revealed that a stunning 40 percent of Maryland clean energy comes from dirty sources such as black liquor (pulp and paper waste), incineration, and burning wood waste, all of which are worse for our climate than burning coal or natural gas. Our exposé helped push the Maryland General Assembly to remove black liquor from their definition of clean energy. That means more money for real clean energy like solar and wind programs.
Whistleblowers are among our most valuable citizens, risking personal harm and professional ruin to expose official wrongdoing. But that can only tell part of the story. PEER supports whistleblowers and the goal of government transparency more broadly through aggressive use of the Freedom of Information Act (FOIA). FOIA guarantees PEER access to public records that demonstrate where agencies are failing and succeeding, and where government managers support their staff or suppress inconvenient truths. PEER files roughly 150-200 FOIA requests a year with agencies across the federal government.

FOIA is a magnificent promise that government too often fails to honor. Federal agencies have systematically underfunded FOIA programs, and employees and managers are entrusted to self-regulate their compliance with requests for records. When requests for records are needlessly delayed for months or even years, their relevance diminish as do their ability to hold officials accountable for misdeeds. Agencies also have enacted a pattern of unreasonable exemptions to FOIA, shielding officials from embarrassment by withholding information from the public.

When agencies refuse to comply with FOIA, PEER does not hesitate to bring litigation, and PEER maintains one of the most active FOIA dockets in the nation. Over the past year we have filed FOIA lawsuits to trigger release of documents about:

- Corruption in environmental cleanup of former naval bases,
- Appointment of unqualified political figures under the Trump administration,
- Unregulated expansion of e-bike use on sensitive backcountry trails,
- Transfer of contaminated properties by NASA to avoid environmental liabilities,
- Construction of telecommunications equipment in untouched wilderness areas,
- Release of zoonotic diseases from USGS bio-laboratories, and
- US Park Police’s violent crackdown on Lafayette Square protesters in Washington, DC.

The records we obtain are used to fuel investigative reporting and public discourse on the need for reform of government agencies, by revealing deep-seated problems that may have otherwise gone unnoticed. In the coming year we intend to maintain or accelerate this work, both by filing more requests and litigation and by encouraging Congress to amend FOIA to eliminate bad faith excuses that some agencies use to shield themselves from public accountability.
One essential focus of PEER’s public lands program is supporting the employees charged with protecting national treasures: our public lands and resources. To gain an understanding of how employees are faring at the Bureau of Land Management (BLM), we reached out to our networks and conducted the 2021 Bureau of Land Management Employee Survey Report. We talked to people across the western states in a broad spectrum of positions, ranging from field staff on the ground assessing landscape conditions to wildlife scientists, archaeologists, and headquarters staff leading national policy. We also heard from employees impacted by the controversial move of BLM headquarters from inside the beltway of Washington, DC to the small western town of Grand Junction, Colorado.

Overwhelmingly, employees cited lack of staffing as the number one concern. These staff shortages persist at all levels, from field to state to headquarters. And there is frequent turnover, especially in the rural offices. We heard how the change from the Obama administration to the Trump administration brought chaotic disruption to established systems within the agency. For instance, in Utah, the change in monument boundaries by the Trump administration was accompanied with a huge reduction in staff, especially scientists. This resulted in projects being abandoned. Employees were concerned about political influence and corruption within the agency.

The Trump administration, to cater to the extraction industry, was fast tracking oil and gas leasing permits through the headquarters office. This resulted in local stakeholders and local impacts being ignored and the regional staff left holding the bag.

We heard how headquarters micromanaged planning decisions, requiring every decision to be run through headquarters, sometimes resulting in bottlenecks in getting projects on the calendars. Some of the most disturbing concerns that we heard were of retaliation and employee intimidation. Employees believe that the administration, by officially eliminating diversity training in the agency, ended up marginalizing many employees.

Similarly official statements from top leaders emboldened misogynistic, racist, and extremist behavior. From all of these conversations PEER produced a report detailing employee concerns and suggestions for reform. Additionally, we hosted a webinar to feature the report and publicly present our findings and recommendations. The webinar included a presentation of a conservation group’s review of BLM land use planning documents and the personal feedback of two former BLM employees. The former employees had decidedly different experiences within the agency, but both were led to speak publicly in hopes that they could help with reform. The webinar was well-attended and received widespread media attention.

“The Department of the Interior has some of the most talented, dedicated and purpose-driven employees in the federal workforce. However, over the years, the department has been poorly managed, and increasingly administered for the benefit of private commercial interests. I am proud to be working with conscientious range management specialists, scientists, law enforcement officers to protect our public lands and national heritage.”

Chandra Rosenthal, Rocky Mountain PEER Director
A firefighter was just 38 years old when he was diagnosed with testicular cancer. Located on the small island of Nantucket, Massachusetts, he was 30 miles from the mainland and even farther from Boston’s renowned cancer hospitals. The Town of Nantucket rallied around him, supporting his wife and two small children, while he spent months in Boston dealing with surgery and chemotherapy.

His wife could not believe her young, healthy husband was sick. Suspecting it had to do with his career as a firefighter, she started digging. With the help of a fellow firefighter, she was horrified to discover that his turnout gear—the protective pants and jacket that every firefighter must wear—was probably the culprit.

Cancer is the leading cause of death for firefighters. In 2019, 75% of on duty firefighter deaths were from cancer. Everyone assumed the cancer was from hazardous chemicals in burning buildings, until Dr. Graham Peaslee, a professor at Notre Dame University, discovered in 2020 that turnout gear contains massive amounts of per-and polyfluoroalkyl substances (PFAS). PFAS are so toxic that they are currently regulated in parts per trillion. This is because high levels of PFAS are associated with suppressed immune function, thyroid disease, testicular and kidney disease, cancers, and liver damage. Despite this, scientists found that turnout gear has PFAS in parts per billion, which are then absorbed into the skin. Wearing this PFAS-laden gear results in higher PFAS blood serum levels in firefighters, and, presumably, death from cancer at rates that are 14% higher than other Americans.

All moisture barriers in firefighter turnout gear—the middle layer sandwiched by the thermal barrier and the outer layer—are required, by National Fire Protection Association (NFPA) standards, to be able to withstand harsh ultraviolet light, something that only textiles containing PFAS can do. However, the test imposed on this moisture barrier is nonsensical, because the middle layer is not exposed to ultraviolet light. Moreover, the test was based on a deeply flawed master’s thesis conducted in 2000, and supported by the PFAS industry. Due to this NFPA standard, it is impossible to buy PFAS-free gear for firefighters.

Working with firefighters and other public interest groups, PEER pushed an amendment to this NFPA standard. This amendment would eliminate the requirement that ensures the presence of PFAS in turnout gear. While it was voted down, PEER then helped file three appeals and obtained over 180 letters of support from politicians, other NGOs, and firefighters in the United States and Canada. The NFPA denied all three appeals, so PEER is now turning to legislation and the EPA to get PFAs out of turnout gear. The NFPA is failing to protect firefighters and instead intentionally places them in harm’s way.

Thankfully, the firefighter from Nantucket is back with his friends and family. Despite his arduous journey, every day, he must put his PFAS-laden gear on to fight fires—the very gear that nearly killed him. PEER will continue to work with its firefighter clients until we can give them the option of PFAS-free gear.
“Information is power” is a common adage. That is especially true in government, where regulations and official actions often turn on assembling the requisite supporting data. So, it is no wonder that on projects or programs with millions and sometimes billions of dollars at stake government scientists are often pressured to produce findings that support the politically “right” answer. When scientists face this type of pressure, especially when it is applied through their own chain-of-command, they call PEER. For more than a quarter century, we have provided free legal representation to scores of government scientists, from physicists to entomologists, toxicologists microbiologists, archaeologists, and even economists. Regardless of their discipline, they find themselves under attack for the political implications of their work on topics ranging from climate change to chemical safety to affected species from right whales to Monarch butterflies.

These fights are usually uneven, as these scientists do not control their budgets or their ability to publish research. They are also rarely eligible for legal protection as whistleblowers because they are not blowing the whistle on misconduct but are simply doing their jobs by uncovering inconvenient truths. Often, they have no direct legal recourse when, for example, an agency decides to slow-walk permission to seek publication of research in order to make it untimely.

Furthermore, during the Trump reign of “alternative facts”, federal agencies themselves were used as fountains of disinformation. This shocking experience has deepened the call for rules to protect “scientific integrity”—protections not only for the quality of the data but also for the specialists who conduct the research.

There is a growing consensus that the issues at stake are too important to continue allowing government agencies to concoct their own set of facts. Conversely, the quality of government decision-making depends on how well it is based in reality, rather than serve pre-set talking points.

Recognizing that past efforts have not gone far enough in safeguarding scientific integrity, President Biden commission, as one of his first acts, a task force to determine why existing rules fall short and how to fix them. Given our deep docket of experience, PEER has been a robust participant in this latest effort but with one big caveat—the Executive Branch cannot be trusted to restrain itself and rein in their own political appointees. Congress must adopt standards through legislation that can be judicially enforced – legislation that PEER has drafted.

Our quest is to develop a new branch of law—the Law of Science. These are enforceable rules to protect the scientific enterprise within the halls of power.

Key guardians of scientific integrity are the scientists themselves. PEER is the vehicle by which they are heard in the face of official suppression. In this role, we act as legal guides for traversing intentionally murky restraints placed upon the agencies’ own subject matter experts.

At the same time we aid these individual scientists, we also strive to use their cases as building blocs to create a firmer legal foundation—the cornerstones of an emerging Law of Science—so that those who come after will have a clearer path forward.
Prying Loosing Information on Toxic Sites

To address the threat posed by unregulated toxic PFAS chemicals, EPA announced a PFAS action plan almost three years ago. One of the steps in that plan was the development of an interactive map that would show sources and concentrations of PFAS in the environment. When that map was not produced as promised, PEER sent a records request to EPA for data and information about the map. After months of delay and stonewalling by the Trump administration, PEER sued and finally began receiving documents. We felt EPA was hiding something, and we were determined to find it. Under the Biden administration, we continued our records request. Finally, we received an EPA data set with information on some 120,000 industrial facilities that “may be handling” PFAS, a figure that is over three times higher than outside experts had estimated. These figures show a scale of potential PFAS contamination in this country that is unprecedented. The data PEER obtained will allow communities to begin to understand potential sources of toxic pollution in their neighborhoods and pressure EPA to regulate these dangerous chemicals.

Let’s Not Choose Extinction for the Right Whale

The North Atlantic right whale is one of the most critically endangered whales on the planet. A tragic tale for this iconic whale received substantial new coverage in February 2021 when a 12-year old adult male named Cottontail was found dead off the coast of South Carolina.

Cottontail’s cause of death was most likely from starvation due to entanglement in fishing gear. Virtually all known right whale deaths are from entanglement in fishing gear and ship strikes, activities that can be easily modified or changed. With a current population of about 360 and fewer than 100 breeding females, this whale’s future is bleak.

PEER has been publicizing the plight of the North Atlantic right whale and pushing for solutions that include requiring certain fisheries to move to ropeless fishing gear, expanding fishery closures, and creating mandatory and enforced vessel speed limits when right whales are present.

The North Atlantic right whale can recover if the U.S. takes decisive action to support a balanced use of our oceans. But, unfortunately, we are allowing intelligent, curious, and playful animals like Cottontail to go extinct. PEER is going to do everything in its power to make sure that doesn’t happen again.
I remember exactly why I joined PEER. I worked for the US Fish and Wildlife Service, first as a regional archaeologist then gradually becoming the Regional Historic Preservation Officer. In 1995 I had been asked by the manager of one of the 16 wildlife refuges we managed to provide guidance on proactively managing the heritage of his refuge. I spoke with one of our planners and she suggested preparing Cultural Resource Guides for each refuge. The guides would outline the refuge cultural history and identify known resources, then suggest projects the refuges could undertake when and if money ever became available. Like every federal agency late in the summer, we would be scrambling to spend funds not used during the fiscal year. Our thought was that if we had projects lined-up we could use those year-end funds to do something special for the refuges. My planner colleague and I prepared a couple of these guides. We then went to the Refuge Supervisor to tell him about the project. We were excited to be proactive and helpful in a simple cost-effective way. Both of us had been bureaucrats long enough, we should have known better about what lay ahead, but idealism won out. He listened to us explain what we were doing and then the rant started—“what the heck did we think we were doing…” and on and on. At one point he thundered “If we continued to waste money like this, I will make sure you lose all funding related to this effort” and we would—essentially—be put in our place. I stumbled back to my office royally angry and devastated. My colleague, with more experience, immediately reported him to some higher ups. We were allowed to proceed.

I joined PEER.

I joined PEER because as individuals we have little power or control over how our agencies choose to use our expertise. Sometimes the people who are supposed to support us turn against us. We need help and support to hold our agencies and managers accountable. PEER is just one more guarantee we will be able to do our jobs with integrity and I encourage you to join me and countless others in supporting their work.
PEER is committed to financial transparency and careful stewardship of our supporter’s investment in the organization. We are proud to hold Charity Navigator’s highest rating for fiscal responsibility and ethical practices.

Giving Stock or Distributions from your IRA is Easy!

**Stocks and mutual funds**
When you donate appreciated stock or mutual funds in support of our mission, you can reduce or even eliminate federal capital gains taxes on the transfer. You may also be entitled to a federal income tax charitable deduction based on the fair market value of the securities at the time of the transfer. When you donate securities to PEER, you receive the same income tax savings that you would if you wrote a check, but with the added benefit of eliminating capital gains taxes on the transfer, which can be as high as 20 percent.

**IRA Gifts**
If you are 70 ½ years old, you can give up to a maximum of $100,000 per year from your IRA directly to a qualified charity like PEER without having to pay income taxes on the money. Learn more at peer.org/donate/ways-to-give

---

**GROWTH, EVOLUTION, AND CHANGE**

<table>
<thead>
<tr>
<th>Category</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fundraising</td>
<td>7%</td>
</tr>
<tr>
<td>Legal</td>
<td>31.2%</td>
</tr>
<tr>
<td>Administrative</td>
<td>9.8%</td>
</tr>
<tr>
<td>Communications &amp; Outreach</td>
<td>16%</td>
</tr>
<tr>
<td>Resource Protection</td>
<td>36%</td>
</tr>
<tr>
<td>Total Expenses</td>
<td>1,325,315</td>
</tr>
<tr>
<td>Grants</td>
<td>57.5%</td>
</tr>
<tr>
<td>Program Income</td>
<td>28.2%</td>
</tr>
<tr>
<td>Total Revenue</td>
<td>1,308,999</td>
</tr>
</tbody>
</table>

**ASSETS** $1,446,633.59

**LIABILITIES** $133,665.56

These financial results are unaudited and rounded to the nearest dollar. Please visit our website at www.peer.org for complete audited financials that are GAAP compliant. The October 2020-September 2021 audited financial statement will be posted on our website in March of 2022.
Thank you for Supporting Whistleblowers

This year we’ve had the privilege to defend environmental whistleblowers at an unprecedented scale, but our work is not over. Please consider making a donation to PEER and defending those that defend our natural environment. Thank you for joining us in this effort.