



PEERreview

A Publication of Public Employees for Environmental Responsibility

Climate Integrity Project Targets False Solutions

The world is in a climate crisis. Yet, many of the control mechanisms adopted here and abroad create only the illusion of progress. That is why PEER is launching a Climate Integrity Project that will focus on addressing bogus offsets, keeping clean energy clean and strengthening transparency in climate programs.

Addressing Bogus Offsets

The buying and selling of offsets have become a cornerstone of the global effort to limit global warming. Offsets allow companies to continue to rely on fossil fuels if they buy credits from projects that reduce greenhouse gases elsewhere – such as projects that involve protecting or planting trees or reducing the production of refrigerants.

A central problem with offsets is knowing whether the reduction in greenhouse

gases resulting from the offset is additional (meaning the reduction in greenhouse gases would not have happened anyway). Due to fluctuations in both prices and demand, it is often impossible to predict why a particular project occurs. The unverifiable nature of most offsets creates a false sense of meaningful progress.

Further, the complexity and subjectivity of offsets also render them impossible to certify, regulate or enforce. In some cases, such as forestry projects, the offsets will fail to mitigate demand appreciably. Meanwhile, the polluting activity (such as logging) that is supposed to have been averted will simply shift elsewhere.

California's cap-and-trade program is a prime example. It has failed to produce meaningful reductions because it relies on trading offsets that are not real, permanent, quantifiable, verifiable,

or enforceable. Nor can the state show that any claimed greenhouse gas emission reduction would not have occurred otherwise.

In essence, offsets are commodities based upon guesses about what would have happened in their absence. As such, they constitute a new creative financial instrument that carries the same deceptive potential to bankrupt markets, as did the creative instruments peddled on Wall Street leading to the 2008 crash.

PEER is working with public servants to expose bogus offsets and encourage the adoption of verifiable and enforceable greenhouse gas reduction mechanisms. As a planet, we do not have the luxury to waste time on market ploys that mask continuing destructive practices.

Keeping the Clean in Clean Energy

Another focus of our project is to get the dirty out of clean energy programs. Many states have Renewable Portfolio Standards (RPS) designed to give utilities and other energy providers incentives to switch to "clean energy" sources. Unfortunately, many state definitions of "clean" or renewable are so loose as to defy belief. As a result, these so-called green programs often provide incentives to pollute.

In Maryland, for example, dirty energy sources made up almost one-third of the sources it considered "clean energy." These dirty sources include burning woody biomass, garbage, and other gases



PEER is launching the Climate Integrity Project to bring credibility and transparency to climate programs.



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FROM THE EXECUTIVE DIRECTOR

I am often asked my opinion on how the Biden administration is doing one year into his term.

The answer is complicated. With an unrelenting pandemic and a democracy in peril, it should come as no surprise that the administration is struggling to implement a meaningful and coherent environmental agenda.

On a positive note, the administration has tried to put its best foot forward on climate change, delivering on several promises such as rejoining the Paris climate accord, increasing fuel efficiency standards for cars, and phasing down climate-damaging hydrofluorocarbons. But real change continues to be blocked by the continuing power of the fossil fuel industry in Congress.

The administration has also made improvements in the management of public lands and waters. The President's protections for Bears Ears and Grand Staircase-Escalante National Monuments and Northeast Canyons and Seamounts Marine National Monuments are examples of positive steps the administration has taken to rebalance our country's priorities. The President has also embraced the goals of conserving at least 30 percent of the nation's lands and waters by 2030 (known as 30x30). So far, however, the administration has taken few steps to implement this plan.

One agency that is struggling under Biden is the EPA. The agency continues its decade-long fall under this administration. Perplexingly, it continues to support key mid-level managers who did some of the Trump administration's worst bidding. We are in constant battles with the EPA over their failure to provide basic information to the public, corrupt EPA managers who delete scientific determinations on toxic chemicals without fear of consequences, and a press office that manipulates public perceptions about what the agency is really doing.

The bottom line is that one year after taking office, the administration's efforts to address the environment have not escaped the broader challenges facing this country. And this has greatly complicated our country's ability to address three crises that all of humanity faces: climate change, biodiversity loss, and toxic pollutants in our environment.

We are thankful for the progress we have made, but so much more needs to be done. Please let us know where you think we should focus our efforts as we enter the second year of the Biden administration. I am looking forward to hearing your thoughts.

Thanks, and have a healthy and safe new year,

— **Tim Whitehouse, Executive Director**

About Us

PEER protects public employees who protect our environment. We are a service organization for local, state, federal and tribal public employees, including scientists, law enforcement officers, land managers, and all others dedicated to upholding environmental laws and values. Through PEER, public servants can choose to work as "anonymous activists" so that public agencies must confront the message, rather than the messenger.

WILDLIFE SURVIVAL

Ban Lead from National Parks



Acute and chronic lead poisoning is the leading cause of death in some areas for species such as condors.

PEER is leading an effort to ban lead-based ammunition and fishing tackle from all national parks. While most parks by law do not permit hunting, some 76 of the total 423 national park units allow recreational, subsistence, or tribal hunting. However, those parks with hunting (the largest are in Alaska) cover more than 60% of land within the entire national park system. In addition, more than 85% of parks with fish (213 in all) are open for fishing.

Early in the Obama administration, the National Park Service (NPS) briefly announced such a ban but reversed course under

opposition from the NRA. We think the Biden administration may be more willing to defy the gun lobby.

The stakes are high. The NPS admits lead is a toxic contaminant presenting significant risks to wildlife and the environment. In one memo PEER obtained, an NPS biologist acknowledged the “significant body of science [that] exists on the negative impacts of lead on wildlife and humans...the NPS, as a leader in land management, has fallen behind on this issue.”

Wildlife is most exposed to lead through direct ingestion of lead-based ammo and fragments. Animals do not have well established detoxification mechanisms to biochemically protect themselves from exposure effects.

Birds are particularly susceptible to both acute and chronic lead poisoning, which is the leading cause of death in some areas for species such as condors. Lead fishing tackle left in waters can cause elevated levels of lead in fish and amphibians.

Altogether, more than 130 park wildlife species are exposed to or killed by ingesting lead or prey contaminated with lead. So long as lead-based ammo remains available for purchase and use in national parks, wildlife will continue to be poisoned, with attendant human health risk from eating contaminated animals.

In short, it is high time for national parks to embrace the PEER initiative to “Get the Lead Out.”

Welcome Erin Hendel



We are delighted to welcome Erin Hendel as our Institutional Giving Manager. Erin is a writer and fundraising professional with more than a decade of experience in conservation and education. She comes to PEER from The Nature Conservancy in Montana, where she helped to protect more than 500,000 acres of forests and grasslands over seven years. Erin's career

has blended a commitment to environmental conservation with research, writing and project management expertise. Prior to The Nature Conservancy, Erin taught writing and literature courses and supported the Humanities Institute at the University of California (UC) Davis. She earned a PhD in English with an emphasis in Native American Studies from UC Davis, a master's degree in English and Environmental Studies from the University of Montana and a bachelor's degree in English and French from Grinnell College in Iowa. She also served in the Minnesota Conservation Corps. When she isn't writing grant proposals, Erin spends her time exploring the vast public lands outside her Missoula, Montana home base.



RANGE REFORM

Livestock Grazing's Climate Hoofprint



It's Not Just the Methane. BLM's vast public lands livestock program is a major factor aggravating adverse climate impacts.

Although climate change is a top priority of the Biden administration, the Bureau of Land Management (BLM) issues or renews public lands grazing permits with no consideration of climate impacts, let alone any effort to mitigate those impacts.

This climate blind spot is no small matter. The BLM oversees 21,000 grazing allotments covering 155 million acres of federal rangelands. Just the amount of methane (a gas with a global warming potential 25 times that of carbon dioxide) emitted by

cattle on public lands equals the amount of greenhouse gases from over 3 million passenger cars, or from burning more than 16 million tons of coal.

That impact is dwarfed by dramatically reduced soil carbon sequestration caused by intense livestock grazing. Public lands grazing is the most significant contributor to deteriorating landscape conditions across a vast area of the West, worsening adverse climate impacts of growing desertification, loss of functioning watersheds, increased wildfire vulnerability, and spread of invasive species.

These adverse effects are magnified if grazing is not well managed. However, a PEER analysis shows that a large portion of allotments fails to meet even the BLM's own range health standards. PEER is urging the Biden administration to ensure that all BLM allotment reviews analyze climate impacts, explore mitigation measures, and adopt policies to promote climate-resilient lands.

"Much of BLM's livestock program escapes any kind of NEPA review whatsoever, and what little there is completely ignores climate change," remarked Rocky Mountain PEER Director Chandra Rosenthal. "The global climate emergency necessitates that BLM finally begins to green its massive livestock program."

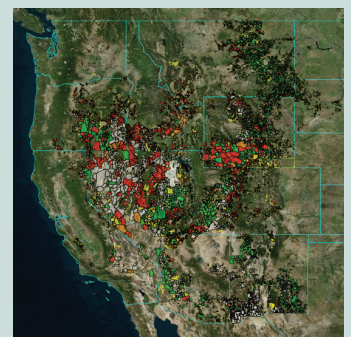
BLM Lost Track of Slow-Moving Cattle

When it comes to tracking the health of public lands, the Bureau of Land Management is leaving important data on the table. BLM range specialists spend valuable field time assessing the health of 21,000 grazing allotments. However, these files are left in the field office filing cabinets as BLM still does not digitize, compile, or analyze some of the paper files.

For the past 25 years, BLM has been required to evaluate whether allotments meet land health standards (LHS) to assure that they have minimum functionality for quality of water, vegetation, and soils, as well as the ability to support wildlife. Yet, BLM's scattered data trove has never been standardized or entered into the agency-wide digital database. Instead, LHS evaluation records are compiled by individual field offices, where they sit. BLM exercises no quality control of records, many of which are incomplete or inconsistent with prior records.

"By using all of the field data, BLM could more accurately assess the health of the range lands and make management decisions to reflect the true carrying capacity of the lands," stated Rocky Mountain PEER Director Chandra Rosenthal.

Through Freedom of Information Act requests, PEER has obtained the entire set of BLM files. We then compiled and cleaned them, combining them with data from other sources, such as the U.S. Geological Survey. When coupled with GPS satellite linkage, PEER's new grazing database provides both the official status, as well as a bird's-eye view of actual conditions on all allotments. PEER has provided a briefing to BLM on our database. If they like it, they are welcome to use it.



Welcome to the 21st Century. PEER has digitized mountains of BLM paper records into a BLM Rangeland Health Map. Visit the map at <https://peer.org/areas-of-work/public-lands/grazing-reform/>.

NATIONAL PARK SERVICE

Park Overflight Controls Off Course

Last year, PEER won a ruling from a U.S. Court of Appeals directing the Federal Aviation Administration and National Park Service to develop long-overdue air tour management plans for 24 national parks, including Glacier, Everglades, Golden Gate, Olympic, Mount Rushmore, and Hawaii Volcanoes. The agencies have until this August to finalize these plans.

Reaping the fruits of this victory is proving problematic, however. The first 11 “Draft Air Tour Management Plans” allow the exact number of overflights currently occurring, which were approved over the years on an interim basis, without any rationale or consideration of alternatives. They also omit any analysis of the environmental effects of noisy air tours – which is the exact purpose of a management plan.

“These drafts do not contain a fraction of the work required by law,” stated PEER General Counsel Paula Dinerstein, who filed an enforcement motion with the court seeking a corrective order. “Grandfathering in the precise number of current flights is the avoidance, not the development, of a management plan.”

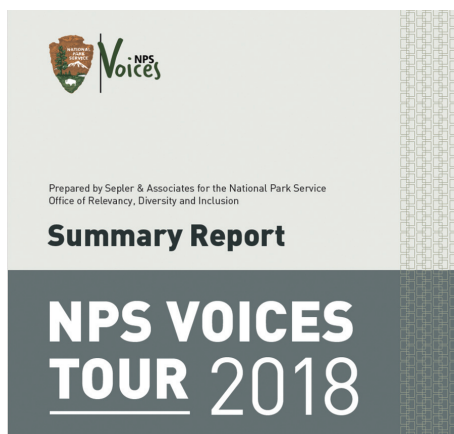


Blight on the Soundscape. Thousands of loud air tours disturb wildlife and park visitors alike.

The PEER suit was based on the failure of the FAA and NPS to complete a single management plan since the enactment of the National Park Air Tour Management Act of 2000, constituting unreasonable delay.

“The months since we won the court order have been a replay of the massive passive resistance the FAA has exhibited for the past twenty years,” added Dinerstein. “We clearly have more work to do before national parks can reclaim their skies.”

The Park Service’s Muffled “Voices”



Disheartening Time Capsule. The “NPS Voices 2018” report was not seen by agency staff until late 2021. It revealed high rates of harassment and the lack of accountability in the NPS.

PEER obtained and posted a copy of a detailed examination of the toxic work culture within the National Park Service that

had gathered dust for the past three years.

Stung by a 2017 survey in which 35 percent of Interior Department employees said they experienced harassment or discrimination within the prior year, NPS commissioned an elaborate outreach campaign called “NPS Voices.” During the four months ending in April 2018, a contractor conducted nearly 100 in-person and web sessions with over 1,200 NPS employees, around 8% of NPS’s entire permanent workforce. Among the key findings were:

- “The pervasiveness of disrespectful and abusive behavior should sound as much alarm as the high rates of harassment that prompted the tour.”
- “Participants express a strong, consistent sentiment that Human Resources does not function effectively or constructively

at every stage of the employment life cycle.”

- A lack of accountability for inappropriate behavior, especially among superintendents.

Ironically, another key finding was that employee cynicism would be aggravated if this attempt at engagement came to naught. Alerted by a reporter, NPS finally posted the report the morning of the PEER press release, blaming the delay on the COVID pandemic.

In a letter to incoming NPS Director Charles Sams, PEER Executive Director Tim Whitehouse advised that “It is not too late to answer the alarm sounded in the NPS Voices 2018 report.” He warned that “Changing the dynamics pervasive within the NPS will take more than words; it will require removing senior leaders who perpetuate this toxic culture.”



ENVIRONMENTAL PROTECTION AGENCY

Redressing Betrayal of First Responders

A ten-year effort to correct a tragic wrong has entered a new phase. In 2011, ten years after the 9/11 attacks, PEER and Dr. Cate Jenkins, a U.S. Environmental Protection Agency chemist (now retired), filed a rulemaking petition for EPA to correct its dangerously lax corrosivity standard.

Corrosive alkaline dust released during building demolition and cement-making can reach levels that can cause chemical burns, especially to respiratory tissue. That was a critical danger facing first responders who responded to the World Trade Center attack without health warnings or any personal protective equipment.

That lapse occurred because the current 40-year-old EPA regulation is ten times less stringent than the levels presumed safe by the United Nations, the European Union, and Canada. The EPA standards are so lax that dangerous levels of corrosive dust are exempt from hazardous waste regulations. As a result, EPA has never issued any warning to the public about alkaline corrosive properties of dust from implosive demolitions of large buildings.

In 2014, after three more years of agency inaction, PEER sought a writ of mandamus before the U.S. Court of Appeals for the D.C. Circuit, which ordered EPA to respond. In 2015, EPA pledged to issue a tentative ruling by the following year. It did so, but then delayed for another five years before issuing its final denial of our rulemaking petition this year. Yet, in its denial, EPA was unable to show that the current lax standard is protective of public health.



EPA Said the Air Was Safe. World Trade Center first responders waded into dust so corrosive it permanently damaged their lungs.

So, after this protracted regulatory Rope-a-Dope gambit, we are taking the agency back to court, challenging the basis of its denial as arbitrary and capricious.

“For this challenge to be successful, we will have to meet a very heavy legal burden, but the moral and environmental stakes are too high to walk away,” stated PEER General Counsel Paula Dinerstein. “EPA will not voluntarily admit it has been wrong, especially when many people have been injured, or even died, as a result of its lax standard. It looks like EPA must be forced to change.”

Superfund: How Clean Is Clean?



Garden Pathways. Disadvantaged communities are often food deserts, unserved by supermarkets. Growing fruits and produce is both an important source of nutrition and community connection.

PEER is working with a growing coalition of groups to persuade EPA to close a major gap in public health protection from toxic chemicals at contaminated sites. These sites being cleaned up under Superfund or Brownfield programs are supposed to meet remediation levels facilitating future land use, as allowed by local zoning.

But at the great majority of contaminated sites where there may be a community desire to grow food, that use is often not considered in setting cleanup standards, as EPA lacks specific guidance to incorporate growing food, aka a “garden pathway.” That means that remediation levels at many sites may be much less

protective than they should be. It also means that disadvantaged communities who consume fruits, vegetables, and other food raised in and on contaminated soils are exposed to pollutants.

Ironically, EPA does have a garden pathway soil calculator for radionuclides, but not for toxic chemicals. Extending the garden pathway to all sites would advance Biden administration environmental justice goals by protecting vulnerable communities. The garden pathway is also a measure of clean-up easily understood by lay people. Best of all, EPA could adopt garden pathways as a measure for all clean-up sites, through the purely administrative action we advocate.

Deconstructing a Corrupt Toxics Shop

For the past several months, U.S. Environmental Protection Agency scientists represented by PEER have disclosed systematic efforts by their managers to remove critical hazard information from assessments of new chemicals before they enter the marketplace. This screening of



Shaken, Not Stirred. EPA's new and existing chemical programs require major surgery.

new chemicals was the main reform from the 2016 amendments to Toxic Substances Control Act.

EPA's Inspector General is now reviewing hundreds of documents related to these revelations. But the disclosures keep coming. The latest involves a new chemical containing roughly 50% of an existing chemical, which was recently discovered to present a cancer risk. EPA managers still employed by the agency deleted cancer risk calculations and directed the new chemical to be classified as "not likely to present risks," claiming that they did not have the authority to include the new cancer information.

The chemical in question, Parachlorobenzotrifluoride (PCBTF), is used in dyes, pharmaceuticals, and pesticides, and as a solvent in paint and

coatings, which are widely used on automobiles and handled by autoworkers. PCBTF is also in household cleaners. With 50 million pounds produced annually, millions of people are exposed to this chemical.

Further, EPA encourages the use of PCBTF as a "green" alternative because it is a volatile organic that is slow to react with nitrogen oxides on hot days to create ozone.

"Most people would assume when EPA becomes aware of toxicity data on a chemical, that it takes action to address – especially a chemical the agency touts as 'green,'" stated PEER Science Policy Director Kyla Bennett. "How EPA handled this one chemical is a microcosm of a broken regulatory program that is managed in an utterly abysmal fashion."

Clueless Cubed

Incredibly, EPA has also stopped heeding hazard advisories sent to it by industry. Under Section 8(e) of TSCA, those who manufacture, import, process, or distribute chemical substances are required to immediately notify EPA when they become aware that these substances present a substantial risk to health or the environment. These notifications are called 8(e) reports.

However, since January 2019, EPA stopped posting 8(e) reports in its public database of chemical information, making them unavailable to the public and generally unavailable to scientists conducting risk assessments of these chemicals. From 2017 to 2018, there were more than 1,000 8(e) submissions. Since 2019, only one has been posted. PEER is trying to get to the bottom of this fiasco. We aim to obtain and post all the missing reports.

Fighting for the Chesapeake Bay



PEER is working with Waterkeeper groups and elected leaders in Maryland to challenge a new 50-year license for the Conowingo Dam on the Susquehanna River. In a sweetheart deal done behind closed doors with Exelon, the State of Maryland waived its right to impose water quality conditions on the license, conditions it has previously said were necessary for the dam to meet state water quality requirements. Without these conditions, the debris and pollution from the dam will continue to pose an existential threat to the water quality and economy of the Bay. Want to learn more? Check out our video at <https://peer.org/video-conowingo-dam-last-chance-for-a-fair-deal/>



AROUND THE COUNTRY

Greenwashing Artificial Turf



From Waste to Waste. Despite manufacturers' claims, old artificial turf is not recycled when it is removed.

Typically composed of thousands of shredded tires inside a plastic rug, artificial turf fields have a design life of eight to ten years. At that point, the old turf is sent to a landfill, incinerated or, sometimes, illegally dumped. There are an estimated 13,000 synthetic turf fields in the U.S. Hundreds of fields installed in the past

decade are at or beyond their life spans, with that number growing each month.

Ironically, shredding old tires was originally thought to solve the nasty solid waste problems that they had posed at landfills, where they serve as mosquito breeding grounds and the source of belching, hard-to-extinguish fires. Now, these same tires are being returned to landfills. They present no less a fire danger and have been made far more bio-accessible, leeching a brew of toxic chemicals, from lead and arsenic to PFAS into local soil and waters.

PEER has collected reports of turf manufacturers claiming that their product will be recycled or is currently being recycled in the U.S. These claims are designed to paint an image of artificial turf as a “green” alternative to natural grass. However, there are currently no complete circular artificial turf recycling facilities located within the U.S. We could only locate two artificial turf recycling facilities on the planet, one in Denmark and one in the Netherlands. PEER is preparing a false advertising complaint to file before the Federal Trade Commission, seeking an end to this deceptive greenwashing.

Is Syn-Turf “Conserved Land”?

One of the Biden administration’s most ambitious environmental goals is its 30x30 plan to conserve 30% of American lands and waters by 2030. Renamed “America the Beautiful,” the plan remains ill-defined, as it is still not clear what qualifies as conserved land.

Disturbingly, we have heard claims by Interior Department officials that “America the Beautiful” embraces everything “from synthetic turf to new wilderness lands.” Further, Interior issued a grant for urban

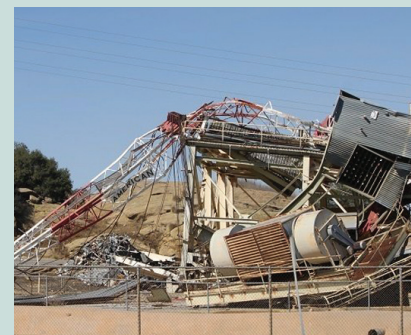
park projects that entailed installation of synthetic turf.

Unfortunately, artificial turf exposes children and athletes to an array of toxic chemicals. In recent years, PEER led a successful campaign to induce both the EPA and CDC to drop their endorsements of shredded tire turf for precisely that reason. We suspect that an industry lobbying effort has infiltrated Interior, and we are taking steps to expose it.

Dynamiting Radioactive Buildings

The U.S. Department of Energy dynamited two radioactive buildings without required dust control to prevent the spread of contamination, and did so without notifying local authorities, who are now investigating a series of complaints filed by PEER and Parents Against Santa Susana Field Lab. The detonation produced plumes of uncontrolled dust, despite requirements for deployment of “water cannons to create a curtain to collect the dust.”

Located just 30 miles from downtown Los Angeles, Santa Susana Lab is the site of a partial nuclear meltdown and numerous other radioactive and toxic chemical releases, making it one of the most contaminated sites in the nation. It has been under a 2007 legally binding agreement with the California Department of Toxic Substances Control (DTSC), requiring restoration of the site by 2017, yet the promised groundwater and soil clean-up has yet to begin – and DTSC (which also allowed this detonation) appears to be backtracking. PEER and the local parents’ group are pressing to get this belated clean-up completed.



Go Boom. DOE dynamited two buildings classified by the EPA as Class 1, for the highest probability of radiological contamination.

U.S. GEOLOGICAL SURVEY

USGS Labs' Scary Bio-Insecurity

The world is in the grip of a pandemic caused by a zoonotic disease that spread between animals and people. For government agencies handling wildlife diseases capable of jumps from species to species, one would expect extraordinary care. At the U.S. Geological Survey, that has not been the case.



Frayed Bio-Safety Net. USGS wildlife disease labs are poorly maintained and suffer frequent equipment failures.

According to whistleblower accounts and documents PEER obtained (mainly from Freedom of Information Act lawsuits), USGS labs handling dangerous pathogens are plagued by repeated releases into the environment and breakdowns, threatening the health of both researchers and research subjects, as well as compromising scientific results. Further, USGS labs frequently do not report environmental releases or other permit violations to oversight agencies.

Unlike every other federal and state agency conducting this type of research, USGS is not independently accredited. That means USGS managers are free to overlook lapses, however dangerous. It also means scientists who report lab breakdowns have no outlet for these issues to be quickly resolved. Instead, they are forced to become whistleblowers. As we have seen – and still see – USGS management is extremely vindictive against scientists who challenge their discretion

to allow lab equipment and maintenance failures to fester.

Adding insult to injury, many of these lab managers have been promoted, some to the top echelons of the agency, thus making redress of this dysfunctional dynamic even harder.

PEER organized a broad coalition of scientific, public health, and environmental groups to formally ask the USGS to voluntarily submit to accreditation for its labs. The acting Director demurred, blandly stating accreditation was not needed because “The USGS continues to invest in [its] facilities to support biosafety and biosecurity.” In other words, the agency refuses to admit it has a problem.

There is, so far, no nominee for USGS Director. When that person is named, PEER will try its level best to make the need for independent accreditation a central issue in the confirmation.

Scientific Integrity Not-Up-To-The Task Force

In one of his first acts, President Biden created a Task Force to fix scientific integrity safeguards that failed badly during the Trump and Obama years.

Within 120 days after being appointed on May 10th, the all-government Task Force was supposed to issue a review: 1) assessing “whether existing Federal scientific-integrity policies prevent improper political interference”; 2) providing “an analysis of any instances in which existing scientific-integrity policies have not been followed or enforced”; and 3) identifying “effective policies that protect scientific independence...” Altogether, a tall order.

To help accomplish this, the Task Force

was directed to reach out to “stakeholders and the public,” but, perhaps ominously, it limited public input, declined to interview scientists whose work had been manipulated or suppressed, and discouraged submissions on reports or alleged offenses in violation of Federal scientific integrity policies.

One January 11, the Task Force finally issued its report. The report admits that current policies do not work and identifies the type of policies that agencies ought to consider adopting.

The report falls short in several respects, however. It lacks specific protocol for how agencies are supposed to investigate or

adjudicate reports of scientific misconduct; omits any discussion of what “added protections” for scientists are appropriate; and fails to explain why agencies have vastly different policies and even different definitions of scientific integrity.

“The report lacks specificity, all but ensuring the Biden administration will fall short on its effort to strengthen federal scientific integrity policies,” stated Tim Whitehouse, PEER’s Executive Director.





PEER PERSPECTIVES

Heavy Meta



Montana Fish, Wildlife & Parks bear management specialist Tim Manley

For nearly four decades, Manley has been the Treasure State's go-to guy when it comes to grizzlies. Since 1993, Manley has participated in captures of 313 grizzly bears, averaging 18 a year. This past year, Manley finished with 33 grizzly captures. His supervisor calls him "one of the best bear managers on the planet." He is not just old school, however, as he developed the GIS mapping system and refined remote camera set-ups with motion- and heat-triggered shutters to better track bears. Knowing when and where grizzlies are about makes it much easier to avoid human-bear interactions, which almost always end badly for either human or bear, or both.



Montana Attorney General Austin Knudsen

A nonprofit called American Prairie has bought up thousands of acres with BLM grazing leases tied to them. The group wants to reactivate these leases, not for cows, but for bison. Feeling somehow threatened, cattle ranchers have raised hell and enlisted Montana's top lawyer to wade in. Knudsen is advancing the odd notion that federal grazing law does not allow for bison – only animals raised for commercial ranching, like cattle and sheep. He claims the plan would "displace Northeastern Montana's livestock industry and replace it with a large outdoor zoo." However, bison have been raised in Montana for commercial production for decades. Experts also point out that Knudsen relies on old or overturned court decisions in making his argument and ignores that even Montana law defines "livestock" to include bison; illustrating just how many ways Knudsen is full of bull.



U.S. Senator Dan Sullivan

The Alaskan Republican is calling for an ethics investigation into top Interior appointees because of their past employment with conservation groups, such as Audubon and National Wildlife Federation (hardly the radical fringe). He says that prior work for any groups that opposed Alaskan energy projects, such as drilling in the Arctic National Wildlife Refuge, "raise dire conflicts of interest." Of course, Sullivan swallowed his ethics whistle when Trump appointed fossil fuel lobbyists who economically benefited from such projects to these same positions.



Acadia National Park Superintendent Kevin Schneider

Schneider is helping to lead the charge against plans by a Norwegian-backed company to build two 60-acre salmon pens in Frenchman Bay next to Acadia National Park, one of the most popular tourist spots in New England. He calls it "an industrial factory just 2,000 feet from the park's boundary," adding that "the scale of the development – the equivalent of 16 football fields – is unprecedented in the United States and incongruous with the existing nature and setting of Frenchman Bay and surrounding lands." It is refreshing to see a superintendent defend against – rather than cheerlead – for industrial development in or near iconic parks.



U.S. Rep. Brian Fitzpatrick

The federal infrastructure bill, which passed Congress this fall, includes \$350 million for wildlife highway crossings. One major advocate for this was Rep. Brian Fitzpatrick, a Republican from Pennsylvania, who said, "The disruption and fragmentation of natural wildlife habitats remain among the greatest threats to biodiversity and conservation efforts, both here in Pennsylvania and globally. As animal extinction continues to accelerate at alarming rates, our focus must remain on establishing a network of wildlife crossings to improve habitat connectivity." Well said. But Fitzpatrick is one of a baker's dozen of House Republicans who crossed the aisle to support the infrastructure bill. For this small bit of bipartisanship, they are being pilloried by their party, proving once again that no good deed goes unpunished.



Maryland State Senator Mary Washington

Senator Washington has distinguished herself as an environmental leader willing to take on entrenched interests. She was an early supporter in the fight to ban fracking and promote clean energy in Maryland. Lately, she has turned her attention to energy scams that prey upon poor and minority communities. She was a leader in the fight to pass a law to make it more difficult for third-party energy suppliers to rip off low-income and elderly customers. While many of these energy companies market themselves as climate champions, they peddle fraudulent and over-priced products to vulnerable customers. Washington's bill is a win for consumers and the climate.



PEER NEWS

PFAS Crisis Growing Worse Under Biden

In mid-October, EPA unveiled an initiative called “PFAS Strategic Roadmap: EPA’s Commitments to Action 2021-2024” that disappointingly points down a road to nowhere.

The reason for the plan is the exploding pollution challenge posed by PFAS, called “forever chemicals” because they do not break down and bioaccumulate in the food chain. PEER recently released an EPA dataset showing some 120,000 industrial facilities “may be handling” PFAS – a figure that is several times higher than outside experts have previously estimated.

Instead of putting forth a series of direct regulatory and clean-up measures, EPA’s “lifecycle approach” entails future promises of planning to plan. Further, it is limited to possible future drinking water

limits on only two PFAS (PFOA and PFOS) and toxicity standards for only seven PFAS. It also relies on voluntary stewardship programs that have consistently failed to work.

By contrast, PEER has formally proposed a plan requiring safe management, generation, transportation, and disposal of all waste contaminated with any form of PFAS. It is a plan that has drawn support from New Mexico Governor Michelle Lujan Grisham, among others.

“EPA’s whack-a-mole approach is a complete dud,” stated PEER Executive Director Tim Whitehouse, a former EPA enforcement attorney. “The PFAS crisis is going to get much worse unless we move far beyond EPA’s terribly timid plan and do so quickly.”

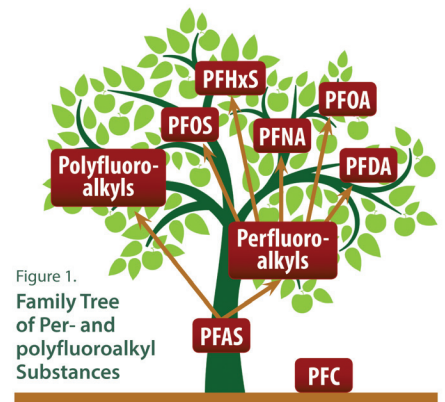


Figure 1.
Family Tree
of Per- and
polyfluoroalkyl
Substances

Fruit of a Poisonous Tree. PFAS is a class of over 12,000 human-made chemicals, according to the latest EPA count, with a carbon and fluorine backbone.

My Resolution to be Grateful



Helen Pent Jenkins
Director of Development and
Communications

With the new year in front of us, like many people, I am looking to my resolutions. Get in shape? Be more mindful? Spend more time with friends and family? Whatever your resolution, it’s time to recommit and double down. One of my resolutions is to be grateful. Grateful for the opportunity to work at PEER and serve public employees that are risking their careers and livelihoods to denounce corruption and malfeasance. Grateful for the incredible show of support from #GivingTuesday to year-end from each of you. From Alaska to Florida, supporters like you gave generously to PEER. As I enter this New Year, I am thankful to all of you and certain that, in 2022, we will accomplish great things. I would like to especially thank Debra Corbett from Alaska for sharing her story in our annual report. Finally, I want to thank the entire PEER community for staying so engaged in the wonkiness of this work and for being advocates in your own right across the country. I THANK YOU.

Thank You!

This quarter, we would like to express our gratitude for the exceptional generosity of the Dudley Foundation, the Klungress Family Foundation, the Martin Foundation, the Tortuga Foundation, the Winky Foundation, the Anderson Rogers Foundation, the Denver Foundation, the Glaser Family Foundation, the Virginia Wellington Cabot Foundation, the New-Land Foundation, ReMain Nantucket and the 822 supporters like you that gave in 2021.



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CLIMATE INTEGRITY PROJECT — Continued from page 1 ►

to produce electricity. Worse yet, records obtained by PEER show that Maryland ratepayers typically pay more for dirty energy sources than clean sources, such as wind and small hydropower, and that these dirty energy facilities have terrible environmental records. Besides the pollution they create, these dirty sources depress the market for truly green sources.

In what must be the most absurd example of a clean energy program going awry in the country, Maryland ratepayers are buying credits from “other biomass gas” to subsidize operations at the Blue Plains wastewater treatment plant in Washington, DC, including its sale of a PFAS-laden fertilizer made from sewage sludge.

PEER is now policing state green energy programs to expose these dirty practices and persuade legislators to tighten up their standards. In Maryland, PEER is calling on

Governor Hogan, Senate President Bill Ferguson, and House Speaker Adrienne A. Jones to work together to get these dirty energy sources out of the Renewable Portfolio Standard (RPS). Removing dirty energy sources from RPS programs would give consumers confidence that the premium they pay for renewable energy reduces pollution and addresses climate change.

Strengthening Transparency

Without transparency, climate programs lack credibility. That is why we are working to bring more transparency to clean energy programs. The lack of transparency in climate programs is a red flag for waste, fraud, abuse, and minimal consumer and climate benefits. Examples of this abound. Some states hide the actual source of the offsets and renewable energy credits sold into their state programs. Others accept

dirty energy sources into their clean energy programs with minimal reporting about the toxic pollutants these sources release into the environment.

Our time is short and the climate math is too rigorous for us to rely on false solutions to the climate crisis. That is why we are launching our Climate Integrity Project. Check our website and PEERMail for periodic updates and let us know if you’d like to get involved.

PEER is working with public servants to expose bogus offsets and encourage the adoption of verifiable and enforceable greenhouse gas reduction mechanisms. As a planet, we do not have the luxury to waste time on market ploys that mask continuing destructive practices.