



Public Employees for Environmental Responsibility | PEER
Strategic Plan: 2022-2025

Approved by Board of Directors on 5/20/22

INTRODUCTION

PEER believes that our nation's public health and environment are best protected by a government workforce that embraces the ideals of transparency, inclusion, and accountability. That is why we vigorously defend environmental whistleblowers in government and partner with current and former government employees who want to make a difference in the world around them.

Our work is urgent. Climate change, biodiversity loss, and toxic pollution are all occurring in the context of governments' weakening ability to address these crises. This has been caused in part by a decline in scientific integrity in government, the capture of many government agencies by special interests, and rising distrust in many parts of the country of government programs and agencies.

This strategic plan charts PEER's course over the next three years. It articulates PEER's vision, mission, and the core values that drive our work, and it outlines our goals, strategies, and initiatives. It also describes PEER's projects and the goals, activities, outcomes, and indicators of success for those projects. This plan will help us continue our work with renewed vigor and purpose while staying true to our mission.

VISION – *What do we strive to achieve?*

We envision a future in which government agencies work to protect the environment, natural resources, and public health in ways that are transparent, legal, based in sound science, equitable, and free of undue political influence.

MISSION – *Why do we exist?*

PEER protects public employees who protect our environment, natural resources, and public health. We support current and former environmental and public health professionals, land managers, scientists, enforcement officers, and other civil servants dedicated to upholding environmental laws and values across federal, state, local, and tribal governments.

VALUES – *What are the core beliefs that guide our work?*

- **Accountability.** We deliver on our promises, and we are accountable to our clients, to our board of directors, to the public, and to the people we serve. We use donated funds effectively and efficiently.
- **Transparency.** We communicate the reasons for our actions, and we operate with honesty.
- **Integrity.** We conduct our work using informed, ethical decision-making and sound science. We hold ourselves to high ethical standards.

- **Commitment to clients.** We stand with our clients and represent them on agreed-upon matters diligently, without charge, no matter how long their case may take to resolve.

OUR COMPETENCIES - *What does PEER bring to the table?*

- A dedicated legal defense team with deep experience and knowledge of public sector employment law and environmental litigation.
- An uncompromising approach to whistleblower defense and environmental litigation.
- Connections to current and former government employees who help guide our work.
- A dedicated, compassionate, and professional staff who represent clients zealously without charge.
- A deep understanding of complex legal and political systems.
- A commitment to elevating diverse perspectives and supporting the environmental justice work of marginalized and historically disempowered communities.

GOALS – *What are the outcomes that we aim to realize?*

- **Support** current and former public employees who seek a higher standard of environmental ethics and scientific integrity within their agencies.
- **Protect and Restore** public lands, wildlife habitats and waters and all of our natural environments.
- **Address** the climate crisis.
- **Minimize** toxic pollution in the environment.
- **Improve** public health.
- **Build coalitions** that will achieve lasting environmental and public health improvements for diverse habitats and communities.

STRATEGIES – *How do we achieve our goals?*

1. **Protect public employees.** We use all legal and administrative means and apply public and political pressure to support employees who suffer retaliation or other negative consequences because of their work protecting the environment.
2. **Increase government transparency.** Maintaining government transparency is essential for environmental protection and to ensure that government serves the public good. PEER works with current and former government employees, usually anonymously, to address issues through official channels and bring hidden information into the light of day.

3. **Improve laws and regulations.** PEER engages in litigation and advocacy to ensure the enforcement and implementation of environmental laws, the use of sound science in decision-making, and adherence to the rule of law. We work to provide solutions to environmental problems both nationally and locally.
4. **Expand collaboration with other groups.** Building lasting change requires coalitions working toward common goals. PEER partners with groups on projects and litigation and provides counsel to other nonprofits within our areas of expertise.
5. **Elevate lesser heard voices.** Finding solutions to environmental problems requires the involvement of marginalized and disempowered communities. PEER works with current and former government employees to elevate the voices of individuals, communities, and local coalitions often unheard.

INITIATIVES – *What are we doing to support our strategies?*

1. **Supporting whistleblowers.** PEER supports public employee whistleblowers by providing specialized no-cost attorney representation. We aim to make government accountable to the public and protect employees who protect the environment.
2. **Improving transparency in government.** PEER works relentlessly to bring visibility to government actions by using freedom of information laws, filing complaints with Inspectors General and the Office of Special Counsel, working with oversight bodies, informing the press, and engaging in litigation.
3. **Strengthening scientific integrity.** PEER works to improve laws and policies addressing scientific integrity and supports agency scientists who suffer from political interference and suppression of their work. We do this by filing scientific integrity complaints, seeking administrative and legal redress, and shining a light on improper government actions.
4. **Protecting public lands and biodiversity.** Public lands, waters, and wildlife are continually under threat, whether from mismanagement, political interference, resource extraction, the changing climate, habitat destruction, or excessive hunting and fishing. PEER works with public employees to identify problems in their agencies to ensure that wildlife and natural spaces are effectively restored and protected.
5. **Addressing the climate crisis.** PEER works to ensure the implementation of ambitious climate actions that increase clean energy and preserve nature and biodiversity. We are a

watchdog for hidden dangers and scams that result from any new climate programs and advocate for systems to evaluate the effectiveness of climate and energy programs.

6. **Reducing toxic chemicals and improving chemical safety.** Government regulatory agencies allow toxic chemicals and dangerous use of pesticides to be released into the environment, negatively affecting communities, public health, and natural spaces. PEER works to expose wrongdoing and challenge the industry capture of our regulatory agencies through litigation and working alongside public employees to protect our health and the environment.
7. **Improving public health.** Air pollution, water pollution, and toxic chemicals adversely impact public health. Under-regulation, under-enforcement, industry capture, and the absence of regulatory standards are to blame. PEER aims to expose government failures, provide constructive solutions to problems, and litigate action to ensure the proper protection of public health across all facets of society. We partner with impacted communities to elevate public health issues of importance to them.
8. **Strengthening enforcement of environmental laws.** Even as the need for strong environmental and natural resource protection is growing, enforcement programs are facing declining budgets, lower staffing levels, and sinking morale. The failure to hold polluters accountable for breaking environmental laws creates an uneven economic playing field and weakens environmental and public health protections. If agencies are poorly staffed and overwhelmed, they cannot uphold their conservation and protection mandates. That is why PEER works to support the enforcement of environmental and natural resource laws at the federal, state, and local levels.

Project: Defend Environmental Whistleblowers and Public Employees

Purpose: Provide pro bono legal representation and advice to public employees who are working to protect the environment and who suffer retaliation or other negative consequences because of their work.

Project Goal: Public employees can work without fear of retaliation. Government works to protect public health and the environment.

- **Key Initiative:** Supporting whistleblowers.
- **PEER's Key Competency:** Dedicated legal defense team with deep experience and knowledge of public sector employment law and environmental litigation.

Three Year Outcomes:

- Stronger whistleblower protection laws and policies.
- Increased public awareness of the important role whistleblowers play in protecting the environment and enhancing, accountability, and transparency in government actions.

Short Term Activities:

- Provide legal representation and counsel to 35 public employees and conduct at least 5 employee-driven campaigns.
- Represent clients before Merit Systems Protection Board and other judicial and administrative forums.
- Represent clients and provide disclosures to Inspector Generals, Occupational Safety and Health Administration, Office of Special Counsel and other administrative bodies.
- Gather information using tools such as public information requests, scientific integrity complaints, data quality complaints.
- Organize public campaigns around employee issues to pressure government agencies to address underlying environmental issues raised by clients.

Success Indicator:

PEER successfully addresses clients' concerns and resolves underlying environmental issues and problems.

Project: Increase Government Transparency

Purpose: Advocate for increased government transparency and use available laws to bring information that governments want to keep hidden into the public domain.

Project Goal: Greater government transparency, improved decision-making processes, and more public involvement in government decision making.

- **Key Initiative:** Improving transparency in government.
- **PEER's Key Competency:** A deep understanding of complex legal and political systems.

Three Year Outcomes:

- Meaningful laws are passed that provide greater protection of government records and public access to information.

Short Term Activities:

- Submit letters of support for statutory changes for three laws
- File 10 Freedom of Information Act (FOIA) Lawsuits
- File 50 FOIA or other public information requests
- Conduct 2 webinars for the general public
- Publish 2 op-eds and 2 blogs

Success Indicator:

Successful release of information in 50 percent of the instances where PEER files a FOIA request.

Project: Strengthen Scientific Integrity

Purpose: Work to implement new scientific integrity policies in federal agencies, which are broken and need to be fixed.

Project Goal: Federal agencies have policies that protect scientific integrity and promote the highest scientific and ethical standards.

- **Key Initiative:** Strengthening scientific integrity.
- **PEER's Key Competency:** An uncompromising approach to whistleblower defense and environmental litigation.

Three Year Outcomes:

- President's Scientific Integrity Task Force, EPA, USDA, Department of Interior, and NOAA adopt scientific integrity policies that provide strong protections for scientists who file misconduct complaints, ensure that supervisors are not evaluating the complaints of their subordinates, and penalize managers who punish whistleblowers.

Short Term Activities:

- File comments with agencies on improving their scientific integrity policies.
- Publish three op-eds
- Hold one PEER webinar
- 15 earned media credits
- Develop model scientific integrity policy; use this model to evaluate scientific integrity task force recommendations and new scientific integrity policies proposed by agencies.
- File scientific integrity complaints on behalf of scientists as needed.

Success Indicator:

All federal agencies adopt robust scientific integrity policies.

Project: Protect the Environment and Wildlife Through Litigation

Purpose: File lawsuits to support implementation of environmental, wildlife, waters, and public land protective laws.

Project Goal: Improve protections for the environment, wildlife, and public land health.

- **Key Initiative:** Protecting public lands and biodiversity.
- **PEER's Key Competency:** An uncompromising approach to whistleblower defense and environmental litigation.

Three Year Outcomes:

- General outcomes will depend on future judicial decisions.
- Current litigation aims include better protections for the Louisiana Black Bear, preventing the improper approvals of e-bikes in National Parks, ensuring that air tour overflight plans for National Parks adhere to the law and minimize environmental impacts, and strengthening hazardous waste regulations to protect worker and public health.

Short Term Activities:

Complete a yearly litigation docket of 3-10 environmental and wildlife protection cases.

Success Indicator:

Success indicators will vary depending on the lawsuits PEER files. Indicators include greater legal protections for fish and wildlife species, improved wild habitats, better protections for visitors and wildlife in parks and other environmental benefits.

Project: Improve Management of Public Lands

Purpose: Ensure the Bureau of Land Management, the National Park Service, the National Forest Service and other land use agencies implement policies that support ambitious conservation and climate targets.

Project Goal: Thirty percent of the land and waters in the U.S. are protected, and U.S. land use agencies support and promote conservation values.

- **Key Initiative:** Protecting public lands, waters, and biodiversity.
- **PEER's Competency:** An uncompromising approach to whistleblower and environmental defense.

Three Year Outcomes:

- Support 30 X 30 goals with meaningful conservation definitions and mapping of progress toward these conservation goals.
- Adequate staffing of National Park Service, Bureau of Land Management and other public lands agencies.
- Increase in wilderness areas and protections for these wilderness areas.

Short Term Activities:

- Share land health geospatial map that is publicly available.
- Challenge agency actions that undermine conservation and climate targets.
- Report on obstacles to the President's 30x30 goals with recommendations to address obstacles.

Success Indicators:

Agencies provide increased protections for public lands, waters, wildlife, and biodiversity.

Project: Address the Crisis of Toxic Pollution

Purpose: Protect public health and wildlife from PFAS and other toxic contamination.

Project Goal: Governments implement science-based laws, regulations and policies that minimize risks from PFAS and other toxic contamination

- **Key Initiative:** Reducing toxic chemicals and improving chemical safety.
- **PEER's Key Competency:** An uncompromising approach to whistleblower defense and environmental litigation.

Three Year Outcomes

- More robust review of the safety of new and existing chemicals at EPA.
- Science-based definition of PFAS.
- EPA regulating PFAS as a class.
- All non-essential PFAS uses banned at federal level.
- Safe management and disposal of PFAS and PFAS-contaminated waste.
- Minimize use of confidential business information status to shield important health information from the public.

Short Term Activities:

- Share knowledge on the extent of PFAS contamination based on EPA data
- Support introduction of legislation to manage waste contaminated with PFAS
- Support getting PFAS out of firefighter gear
- Support getting PFAS out of plastic containers that may contain beverages and other liquid consumer products.
- Share PFAS resources on PEER website with EPA data
- Hold 2 webinars for members of the public
- Publish 5 blogs and 2 op-eds on issues raised

Success Indicator:

Decreasing amount of toxic PFAS released into the environment.

Project: Build Climate Integrity

Purpose: Address the urgent threat of climate change.

Project Goal: Hold governments accountable to ambitious climate goals. Ensure these goals are based on sound science and policy supports holistic approaches to reducing greenhouse gas emissions and building resiliency in our communities.

- **Key Initiative:** Addressing the climate crisis.
- **PEER's Competency:** A deep understanding of complex legal and political systems.

Three Year Outcomes:

- Federal and state agencies engage in more transparent, science-driven decision-making with respect to renewable energy credits, and subsidies for GHG reduction and storage.
- Federal and state renewable energy programs deliver real renewable energy and other climate benefits.
- States begin eliminating dirty sources, e.g., biomass and incineration, from "clean" energy portfolios.
- All levels of government develop more robust biodiversity and land protection initiatives, understanding that land and water protection are key to building resiliency in human and natural ecosystems.

Short Term Activities:

- Pressure public land use agencies to build capacity issues in order to address the Biden administration's climate and conservation goals.
- Release BLM land health and grazing database with recommendations for improving collection to drive policy on BLM lands.
- Produce two reports that expose how offsets and renewable energy credits can be used to greenwash and provide recommendations for corrections.
- Hold two webinars.
- Publish 5 blogs, 3 op-eds on issues raised.

Success Indicator:

Federal and state programs produce verifiable results in reducing CO₂ and greenhouse gas equivalent emissions and/or improve the health of public lands to absorb carbon and improve resiliency.

Project: Reduce Use of Toxic Pesticides

Purpose: Protect public health and wildlife by reducing use of toxic pesticides.

Project Goal: Ensure that decision-making, laws, regulations, and policies are science-based and minimize risks to human health and the environment.

- **Key Initiative:** Reducing toxic chemicals and improving chemical safety.
- **PEER's Competency:** An uncompromising approach whistleblower and environmental defense.

Three Year Outcomes:

- Removal of PFAS from pesticides.
- Improvement in management processes for approving pesticides.
- Better use of science in evaluating risks and greater transparency in government decision-making.
- Better protections for honeybees and other pollinators nationally.
- An end to aerial spraying in at least one state.

Short Term Goals:

- Ban PFAS in pesticides
- Strengthen buffers and label restrictions
- Strengthen pesticide registration process
- Support efforts to tighten emergency exemption process
- Support efforts to improve revocation process
- Support legislative reforms to pesticides laws nationally and at the state level.

Success Indicator:

Improve public and wildlife health by decreasing the amount of toxic pesticides released into the environment.

Project: Address Regional Environmental Concerns

Purpose: Address regional concerns that public employees bring to us, independent of national campaigns and priorities.

Project Goal: Address the concerns of public employees.

- **Key Initiative:** Strengthening compliance with environmental laws.
- **PEER's Key Competency:** Connections to current and former government employees who help guide our work.

Three Year Outcomes: Case and issue specific.

Short Term Activities: Case and issue specific.

Success Indicator:

Indicators will be case and issue specific. Public employees, non-profits, and diverse communities feel comfortable approaching PEER for legal support and advice. PEER is seen as a reliable partner.

Project: Respond to Intakes and Emerging Issues

Purpose: Address issues and concerns public employees bring to us, and respond to emerging topics as needed.

Project Goal: Respond to and address every meritorious issue brought to us by current and public employees.

- **Key Initiative:** Supporting whistleblowers and public employees with environmental and public health concerns.
- **PEER's Key Competency:** A deep understanding of complex legal and political systems.

Three Year Outcomes: Case and Issue specific.

Short Term Activities: Case and issue specific.

Success Indicators:

PEER remains a nimble organization that can respond to the needs of public employees and react quickly to environmental policies and issues.

DEVELOPMENT OPERATIONS GOALS

Addendum A

Development Vision

The goal of the Development Department at PEER is to grow restricted and unrestricted revenue, deepen board and staff engagement in fundraising, and create a cohesive donor experience that is true to PEER’s unique brand.

Supporting Documentation

Each year, the Development Team creates a fiscal Development Operations Plan that states goals, objectives, activities, and metrics. The Plan is updated annually and is tied to organizational outcomes, budget, and strategies.

3-Year Development Goals

At the end of the 3-year strategic plan, the Development team envisions a robust and data-driven development program, a healthy donor pipeline for PEER, a fully-fledged foundation program, an active development committee of the board, a strong but nascent legacy program, and an engaged staff committed to development efforts.

Operational Development Goals

FY 2022	FY 2023	FY 2024	October 2025
Conduct an assessment of legacy prospects	Create and launch formal legacy giving program	Increase legacy giving participation	Fully formed Legacy Program
Grow budget by \$60,000 by building donor pipeline and growing foundation program	Grow budget by \$225,000 by building donor pipeline and growing foundation program	Grow budget by \$225,000 by building donor pipeline and growing foundation program	FY22 Budget = \$1,404,006.00 FY25 Goal Budget = \$1,914,006.00*
Form and staff Development Committee of the Board	Development Committee fulfills year-2 goals	Development Committee fulfills year-3 goals	Development Committee is well-versed in development and feels prepared for legacy/endowment campaign**
Improve data quality and database systems	Carry out ongoing data quality assessments and improvements	Carry out ongoing data quality assessments and improvements	Database is scrubbed and ready for rigorous campaigns

Staff understand the development ops plan	Staff feel motivated and capable of facilitating solicitations	Staff participate in the donor life-cycle	Staff hold a personal prospect list of donors for ongoing stewardship
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*A Note on Increasing the Operating Budget

Summarized are the priority items for increased budget allocation. These line items total \$510,000 raised over three years and sustained thereafter. Increased budget allocation will go to support increasing staffing that supports writing and journalistic efforts, legal services, and administrative support.

**A Note on an Endowment Campaign

Creating an endowment for PEER is a realistic and inspiring goal. However, before launching into a formal endowment campaign, to raise \$1-3 million for example, Development efforts must first focus on creating and growing a legacy program. Only when general operations are fully funded AND we have a cohesive community of legacy donors, can we consider an ambitious endowment campaign. I foresee an endowment campaign launch in the next five years if all funding prerequisites are met.

COMMUNICATIONS AND STRATEGY OVERVIEW

Addendum B

Communications Goal

Grow a dedicated network of current and former public employees and supporters to help protect the environment, natural resources, and public health.

Strategies

1. **Grow** an engaged digital community
2. **Build** up our staff presence as thought-leaders
3. **Strengthen** our communications network

Tactics

1. Create a strong and cohesive brand presence across our digital touchpoints
2. Implement organizational infrastructure to support digital growth/engagement
3. Create and explore more speaking engagements for staff
4. Partner with diverse collaborative organizations to host four webinars per year
5. Update PEER's Newsroom to be more media-focused and allow reporters to easily find our staff experts
6. Launch social media educational campaigns on whistleblowers, environmental health, and policy

Outcomes 2022-2025

1. PEER is positioned as a digitally integrated organization that has an engaged community across owned channels.
2. Organizational infrastructure is in place to support brand and messaging consistency, in addition to increased responsiveness.
3. We have a growing social community with over 15,000 members.
4. PEER has a strong, consistent digital brand presence.
5. PEER's website is a valued resource for the media, public, and potential clients.
6. PEER's webinar attendance has steady participation, growth, social media shares, and ongoing engagement.
7. PEER staff are highly sought after for interviews, frequently invited to speak at events, and are quoted by prestigious media outlets.
8. Donors are aware of PEER's true media impact.
9. Have launched 3-5 social media educational campaigns per year.

TALENT AND OPERATIONAL EXCELLENCE GOALS

Addendum C

Talent and Operational Excellence Vision

PEER is committed to developing a talented, diverse, and engaged workforce to deliver on its mission. Staff will be supported by organizational infrastructure that serves the day-to-day needs of the organization, optimized time and financial resources, and will position PEER to be a strong and stable organization for the decade ahead.

3-Year Talent and Operational Goals

- Recruit talented, diverse, and expert candidates to strengthen the institutional knowledge base and support new initiatives.
- Provide training opportunities for staff and create dedicated professional development goals for each staff person as part of the employee evaluation process.
- Devise and institutionalize better metrics to track operational excellence.
- Position PEER as a virtual-first organization that supports a geographically widespread workforce through improved inter-office communication initiatives and tools.
- Create a technology roadmap to help prioritize and budget for improvements in digital infrastructure.