



PEERreview

CELEBRATING 30 YEARS OF PEER

Defusing Alaska's Heavy Oil Climate Bomb

We are frantically trying to deflect a development that would frustrate all of America's and the world's climate goals.

Fifty years of federally financed research is very close to unlocking vast quantities of high-viscosity heavy Alaskan crude oil for production. U.S. Department of Energy research into polymer flooding, a key element in what is termed Enhanced Oil Recovery, is on the verge of enabling the production of 20 to 30 billion barrels or more of previously inaccessible heavy oil on Alaska's North Slope alone.

The amount of heavy oil in deposits found in four reservoirs across the slope could be bigger than Prudhoe Bay and all other Alaska arctic oil fields combined, making it one of the largest prospective oil developments in U.S. history. It would dwarf the 600 million barrels over 30 years output predicted for the recently approved Willow project.

The greenhouse gas impacts of the next generation of polymer flooding and Enhanced Oil Recovery for heavy oil are staggering. It would certainly exceed the threshold for what is classified as a "carbon bomb" – one gigaton (billion tons) of CO₂ equivalent. Burning 20 billion barrels of oil would release an estimated 8.6 billion tons of CO₂ into the global atmosphere.

"Allowing industry to produce tens of billions of barrels of Alaska North Slope heavy oil through mid-century would be game over for our efforts to combat climate change," stated Rick Steiner, an ecologist and former University of Alaska-Fairbanks professor and Chair of PEER's



PHOTO: WIKIPEDIA, LUCA GALUZZI

Propping Up Oil Flow. Alaska's continuing oil economy is on a collision course with America's climate change strategy.

Board of Directors. "Carbon emissions from this North Slope heavy oil would be orders of magnitude greater than from the Willow project, and it is critical that the Biden administration do everything it can to prevent this next climate disaster."

The Department of Energy has subsidized research on heavy oil recovery through polymer flushing for decades. However, it has recently stopped, effective this fiscal year that began Oct. 1, 2022. Unfortunately, the State of Alaska has stepped in with a \$5 million pledge. Meanwhile, commercial testing on the technology in a North Slope field has commenced.

"Once the heavy oil genie is released, it

will not be kept underground," added Pacific PEER Director Jeff Ruch, noting beyond Alaska, the polymer flooding technology may also increase production of heavy oil fields in places such as California. "At the point when Alaskan heavy oil is officially classified as recoverable reserves, the globe's entire energy calculus will change."

Bringing Alaska's heavy oil to market will require extending the life of the more than 45-year-old Trans-Alaska Pipeline System (TAPS). TAPS has operated long beyond its original 25-year projected lifespan. Its continued functioning is threatened by melting permafrost, a side-effect of fossil-fuel-driven warming. That adds to a



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FROM THE EXECUTIVE DIRECTOR

Thirty Years of Tenacity



One great thing about PEER is our tenacity.

This leads to some wonderful and important victories.

Take, for example, the National Park Service's (NPS) recent decision to curb swarms of commercial air tours rumbling across some of America's most besieged national parks. The NPS's actions only came about after a federal appeals court sided with PEER and local groups and ordered the NPS and the Federal Aviation Administration to implement the National Park Air Tour Management Act of 2000 (see page 5).

Another example is the years we spent representing microbiologist Evi Emmenegger, a biosafety whistleblower at U.S. Geological Survey who was fired and reinstated by USGS. Evi, who was recently featured in a podcast by *Nature*, had raised concerns over the discharge of pathogens from a lab where she worked into a nearby wetland and other related issues.

These victories are reminders of how important our work is and how we can make a difference together.

Of course, not all our work leads to victories, and the results can be disastrous when we lose.

Such is the case of the recent Supreme Court decision, *Sackett v. Environmental Protection Agency*. Since PEER was founded 30 years ago, we have fought vigorously to protect the Clean Water Act from being chipped away by powerful interests wanting to discharge pollutants and fill wetlands without a permit.

The Supreme Court's recent ruling in *Sackett* exceeded all expectations about its disregard for precedent. In *Sackett*, the court ignored previous Supreme Court rulings and held that the Clean Water Act does not cover vast swaths of wetlands and streams throughout the country.

Now that the Supreme Court has issued this devastating blow to clean water protections, we must step up our fight to protect our waters in the courts, Congress, state legislatures, and local governments.

After all, PEER is tenacious. There is too much at stake not to be.

— **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.

PEER PASSAGES

New Institutional Giving Manager



Mer Mietzelfeld

Mer joined the development team at PEER in 2023 as the Institutional Giving Manager. She brings a multi-disciplinary background in science, field research, and business development. Prior to this role, she worked as the Business Intelligence Manager in Corporate Relations at the American Gastroenterological Association. Before joining the nonprofit space, Mer held a series of ornithology field positions with the Belize Foundation for Research and Environmental Education, the North Carolina Museum of Natural Sciences, and the Florida Fish & Wildlife Conservation Commission. Mer holds an MA degree in Environmental Studies from the University of North Carolina Wilmington and a BA degree in biology from Bard College. A lifelong conservationist, she is deeply committed to preserving biodiversity and protecting the environment and public health. In her spare time, Mer is an avid birdwatcher and leads bird walks for several nonprofits in the DC area.

New Board Member



Ewell Hopkins

Since 1982, Ewell has been working in the enterprise application and professional services sales, marketing, and business development fields for software and financial services companies. He currently serves on the Planning Board of the Town of Oak Bluffs, served previously for many years as the Board President of Martha's Vineyard's Habitat for Humanity, and on the Board of his local YMCA. Ewell understands that no societal issue is more important than our relationship with the natural world. The interdependent web of all existence of which we are a part is a life principle by which he was raised. He supports the Environmental Justice movement and believes protecting public employees who protect our environment, natural resources and public health will ensure all voices are heard. Ewell is from Oak Bluffs, Massachusetts.

PEER in the Media

Both national and local news organizations routinely seek out PEER staff for their expert opinions on a wide range of important issues. In fact, since our January edition of PEERreview, PEER has been quoted 137 times in the press on issues such as the effects of pesticides on birds and bees, how the Environmental Protection Agency's staffing crisis affects that agency's mission, and the health of our public lands in the West. Our work has recently appeared in *The Washington Post*, PBS, *The Guardian*, *Nature*, Reuters, *Chesapeake Bay Journal*, *Albany Times Union*, and the *Marin Independent Journal*, to name a few. We invite you to learn more by visiting our news clips page at peer.org or using this QR code.



SCAN QR CODE

Biosecurity Blanket



PEER client, microbiologist Eveline (Evi) Emmenegger is tirelessly pushing her agency, the U.S. Geological Survey, to tighten the biosecurity of its wildlife disease labs. She is not only trying to prevent releases of potentially dangerous pathogens but also to protect both the welfare of animal

subjects and the validity of experimental results. Her efforts have recently been featured in a podcast by *Nature*. Such prestigious coverage has helped make her case a litmus test for scientific integrity improvements under the Biden administration.



ENVIRONMENTAL PROTECTION AGENCY

Woe to WOTUS – and to Us

WOTUS is the acronym for the term Waters of the United States and represents the jurisdictional limit of the federal Clean Water Act. The conservative majority of the U.S. Supreme Court just decided a case that eliminated clean water protections for most wetlands, vernal pools, ephemeral streams, and thousands of other biologically important waterbodies.

This decision constitutes one of the worst environmental reversals of this generation. It is even more restrictive than a 2017 Trump proposal, since rescinded but regarded by many as the most destructive of his nearly 100 eco-rollbacks.

Altogether, more than half of all U.S. waterbodies will lose federal protection, including more than 40 million acres of wetlands and at least 1.35 million miles of streams (due to lack of data, this figure is likely a gross underestimate). As a result –

- As much as 60% of U.S. waters and wetlands, and up to 90% in the arid West, are no longer legally protected. For example, the riparian habitat vital to 80% of New Mexico's vertebrates and 70% of its bird habitat has just lost legal protection;
- Drinking water sources for most of the country are now at risk with the drinking water sources for 117 million people, one out of three Americans, losing legal protections; and
- The millions of acres of wetlands that could be filled or drained would greatly weaken U.S. flood control, strip hurricane buffers, as well as decimate fish and wildlife habitat.

Water scarcity is a growing concern in many parts of the country and has just been made exponentially worse. Meanwhile, the means for preserving the quality of those waters has been significantly hamstrung.



PHOTO: EPA

Wetlands – Nature's Kidneys. They purify polluted waters, but the loss of Clean Water Act protection means that they may be legally filled in, dredged, or polluted without any federal permit.

The Court's decision also undercuts protections for waters still covered by the Clean Water Act. By throwing thousands of water pollution permits and cleanup plans in upstream waters open to challenge and potential pollution, the degradation of these now unprotected upstream waters can lead to the pollution of regulated downstream waters with no clear legal recourse.

Left in the wake is a patchwork of jurisdictional versus non-jurisdictional waters, and PEER is now scrambling to assess the ecological risks posed on a state-by-state basis. Some states, such as California and

Massachusetts, have wetland protections that are not dependent upon federal law while other states lack any such safeguards. We will attempt to draw out a legal roadmap so that states have the tools to protect their own wetlands, pools, and streams.

"Make no mistake, this will cause irreparable damage to clean water and wildlife in the United States" stated PEER Executive Director Tim Whitehouse, a former U.S. Environmental Protection Agency senior enforcement attorney. "That is why we won't give up our fight for more stringent federal, state and local laws to protect wetlands."

Mitigation Banking Collapse



PHOTO: USDA

Prairie Potholes in Peril. These 4.4 million acres of mainly Dakota wetlands are breeding grounds for more than half of North America's migratory waterfowl.

Under the "No Net Loss" of wetlands policy adopted by President George H. W. Bush in 1989, the national goal was to balance wetland losses under the Clean Water Act with mitigation and restoration efforts, so that the total acreage of wetlands in the country remained steady or increased. Ecological restoration of wetlands degraded in the past has been a huge national success story. The Court's decision lands a crushing blow to the mitigation banking and restoration industries, as these measures have lost their legal footing.

NATIONAL PARK SERVICE

Reclaiming National Park Skies

Our years-long litigation against the Federal Aviation Administration (FAA) and the National Park Service (NPS) to enforce the once moribund National Park Air Tour Management Act of 2000 is finally starting to pay substantial dividends. Months after the court-imposed deadline, the two agencies announced draft air tour management plans banning all flights over or within a half-mile of:

- Mount Rushmore National Memorial, which has been averaging nearly 4,000 overflights per year; and
- Badlands National Park, which averages more than 1,400 overflights a year.

On the same day, the FAA and NPS announced draft plans for the two most overflight-besieged national parks, both in Hawaii:

- Overflights at Hawai'i Volcanoes would be limited to 1,565 a year, down from an average of 11,376; and
- Overflights at Haleakalā would be cut by half to 2,412 per year.

The court order we won back in 2020 covered 23 national parks. Notably, these four plans are the first to be prepared with environmental assessments that look at the impacts of hundreds of noisy overflights each year, as required by the National Environmental Policy Act (NEPA).

Unfortunately, the two agencies also recently adopted air tour management plans for 13 other parks without conducting any environmental assessment or otherwise complying with NEPA, such as considering alternatives. For most of them, the two agencies simply took the actual number of air tours over the past three years and adopted that average as the plan. We are arguing in Court that this short-hand approach does not pass legal muster.

Further, as described in the last issue, PEER and allied groups filed a separate lawsuit against the plans for four San Francisco Bay Area parks, including Golden Gate National Recreation Area and Point Reyes National Seashore for this failure to conduct environmental assessments or otherwise comply with NEPA in grandfathering in current overflight traffic.

Apart from legal merits, we believe the plans developed under NEPA are far superior in quality and completeness as compared to the 13 developed without. Thankfully, the last five parks still awaiting plans will have theirs developed under NEPA.

These proposals could change after the public comment period closes. We hope the NPS stands firm and does not backslide. We also hope the Park Service will begin to see the benefit of this type of in-depth planning across a spectrum of issues where the agency is stumbling along on autopilot (see accompanying story).



PHOTO: DOD

Grounded. Tourist overflights are proposed to end at Mount Rushmore and Badlands later this year.

Managing Overcrowding at National Parks

Visitors have flocked back to many major national parks at pre-pandemic record numbers. These crushing crowds are not only detracting from the visitor experience but are also taxing already backlogged infrastructure, damaging resources, such as trails, and driving wildlife further into backcountry.

Some parks have experimented with reservation and/or timed entry systems but have gotten little support from Headquarters against often intense local pushback, including legislation to impede any park

entry restrictions, no matter how jammed.

We are trying to resuscitate a prudent but overlooked law – the National Parks and Recreation Act of 1978. That 45-year-old statute requires every park to have a current general management plan that includes “visitor carrying capacities for all areas” to protect resources and visitors from ruinous overcrowding.

Very few parks have current management plans and almost none establish carrying capacities. Yet, preventing parks from

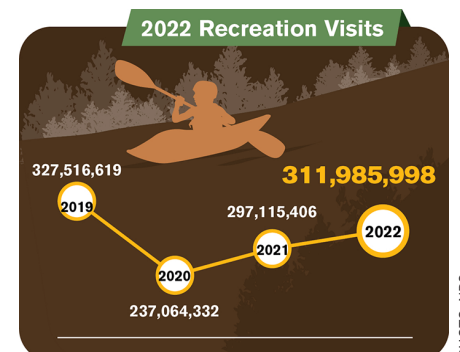


PHOTO: NPS

being loved to death will require this type of thoughtful planning.



PFAS

Fight to Remove PFAS from Plastics

For the past six months, PEER and our partner, the Center for Environmental Health, have waged a pitched litigation battle to stop Inhance Technologies' unlawful manufacture of per- and polyfluoroalkyl substances (PFAS) during its fluorination of hundreds of millions of plastic containers. Nearly three years ago, U.S. Environmental Protection Agency (EPA) testing confirmed the presence of numerous PFAS in plastic containers subjected to fluorine treatment by Inhance to make them impermeable.

These containers are used to ship and store cleaning products, chemicals, including pesticides, personal care products, such as shampoos and conditioners, as well as alcohols, edible oils, and other foodstuffs throughout the world. We want EPA to immediately disallow this practice, because, among other reasons:

- The high levels of PFAS found that have leached into the contents of these containers will cause significant adverse effects to human health;
- Millions of consumers and workers have dangerous dermal, inhalation and ingestion exposure to PFAS during manufacture, distribution, and disposal of these containers; and
- The life cycle of these containers represents a vast but uncontrolled release of PFAS into the environment.

In December, after we filed a Notice of Intent to Sue against Inhance, the Department of Justice, acting on behalf of EPA, filed its own lawsuit against the company seeking only to have the company apply for permission to create PFAS and temporarily halt their process while EPA considered the matter. After we filed suit, EPA moved to have our suit temporarily dismissed because the agency was "diligently prosecuting" the matter. We then successfully intervened in EPA's case.



PHOTO: ADOBESTOCK

PFAS in Plastics is A Major Health Threat. The fluorinated container linings leach PFAS into their contents.

We are forced to litigate because EPA has not moved to stop the manufacture and distribution of these PFAS-laden containers. EPA has a legal obligation to immediately halt these practices altogether since the Toxic Substances Control Act directs EPA "to prohibit or limit the manufacture, processing, or distribution in commerce" of any industrial practice determined to present an unreasonable risk of injury – which this surely is.

"EPA has a legal and moral obligation to immediately stop this PFAS carousel circulating through the heart of America's economy," stated PEER Executive Director Tim Whitehouse, a former senior EPA enforcement attorney. "Unfortunately, too often, EPA assumes a regulatory fetal position that requires the agency be sued in order for it to ultimately do the right thing."

Fouling the Breadbasket

California is by far America's biggest agricultural producer. Yet, more than one-third of agricultural pesticides used in California also contain dangerous levels of PFAS, called "forever chemicals" because they do not break down in the environment. The testing by an independent, certified lab, found PFAS in 3 out of 7 agricultural pesticides.

One widely used insecticide, Malathion, contained PFAS concentration more

than 100,000 times higher than the level EPA considers safe in drinking water. PFAS are associated with immune system suppression, liver damage, thyroid disease, reduced fertility, high cholesterol, and cancer.

"While communities around the country struggle to remove PFAS from their drinking water, we spray millions of acres with the same toxic chemicals," said Science Policy Director

Kyla Bennett, a scientist and attorney formerly with EPA. "It's nonsensical; we can't protect our drinking water unless and until we get PFAS out of all pesticides."

The Center for Biological Diversity and PEER are pressing the California Department of Pesticide Regulation to remove these products from use until such time that contamination can be removed from their supply lines.

Push to Convert Plastics to Fuel Is a Really Bad Idea



PHOTO: WIKIPEDIA COMMONS

Companies burning trash, garbage and plastics call themselves clean and green but refuse to report all of their toxic emissions.

There are a lot of really bad ideas out there to help address the climate crisis. One of the climate ideas is the administration's push to expedite pyrolysis, a process of heating plastic waste to create fuels, to create "clean fuels."

Oil and chemical companies are marketing pyrolysis as "advanced recycling" and arguing that it should be part of the federal Renewable Fuel Standard program, an alternative fuels financial incentives program managed by the U.S. Environmental Protection Agency (EPA) to address climate change.

However, rather than creating renewable or clean fuels, pyrolysis will simply lock the world into a highly toxic carbon future that would be catastrophic for the planet.

Take for example EPA's recent approval of a request by Chevron to create fuel from discarded plastics. According to EPA's own estimates, the emissions from that process are so toxic that 1 in 4 people exposed over a lifetime could get cancer. That risk is 250,000 times greater than the level usually considered acceptable by EPA.

But these big companies aren't stopping there. They are pushing EPA to exempt pyrolysis from the Clean Air Act and have successfully maneuvered to keep from having to report toxic emissions from their pyrolysis plants to the Toxic Release Inventory (TRI), an EPA-managed program that requires industries to report their toxic releases to a publicly accessible database.

What is the solution to this growing problem?

The obvious solution is to reform EPA's broken chemicals program. PEER is advocating for head-to-toe reforms in EPA's new chemicals program. This program has been captured by industry interests and is approving the use of chemicals with astronomical risks to the public, such as fuels derived from plastics. Under no circumstances should EPA be approving chemicals that create a 1 in 4 cancer risk for people living near the facility.

Another solution is to require these facilities to report to the TRI. PEER and the Environmental Justice Network, along with 300 other groups, have petitioned EPA to require all incinerators and waste-to-energy facilities, including those converting plastics to fuels, to report to the TRI. Companies should not be able to get taxpayer subsidies for toxic fuels that they claim fight climate change while refusing to report their toxic releases to the TRI.

Finally, we all need to use less plastics in our life. Humans produce 400 million tons of plastics every year, and about half of that is for single use plastics. Only about 5-10 percent of this plastic is recycled. By 2050, some experts predict the world's plastic production will quadruple.

Government agencies need to lead the way in this effort. PEER, working with a coalition of other groups, is pushing the Department of the Interior to speed up its proposed 10-year phase out of single use plastics on all the lands it manages. Given the crises we are facing, the Biden administration needs to act with the urgency the moment demands.

Looking Forward: Agriculture Goes All in On Offsets

PEER is working with a coalition of groups to prevent public subsidies and other U.S. Department of Agriculture resources from supporting the development of carbon markets that support factory farming operations. In this time of climate crisis, tax dollars should be used to support local and regional food systems and sustainable farming systems. Look for more on this in our Fall issue of PEERreview.

Learn more

Listen to Tim Whitehouse on the episode, "Plastic Burning Pollution Flies Under the Radar", *Living on Earth*. Go to <https://tinyurl.com/y6etxsj7> or scan the QR code here.





BUREAU OF LAND MANAGEMENT

BLM to Assess Rangelands from Outer Space

Without any public announcement or external scientific review, the U.S. Bureau of Land Management (BLM) has introduced satellite imagery as its latest land management tool – with predictably bad results. BLM is now using “remote sensing” as the principal basis for wholesale renewals of hundreds of commercial livestock stock permits in areas failing the agency’s standards for minimal landscape health.

BLM is recommending the renewal of 1,372 livestock permits covering more than a million acres in Montana, based primarily on satellite-generated data. It is also doing similar combined (or “batched”) assessments for hundreds more allotments in other Western states.

BLM’s own experts concede this is no substitute for fieldwork because, among other things:

- Remote systems do not distinguish well between native grasses and exotic plants, treating increased vegetative cover as a sign of landscape health when it may be just the opposite;
- These systems oversimplify ecological changes, such as the inability to distinguish between riparian damage caused by livestock versus weather-induced erosion; and
- The assumptions programmed into the algorithms and modeling have no transparency, meaning that they can result in a systematic failure to recognize deteriorating conditions.

While satellite imagery may be a useful supplement, it is no substitute for good old-fashioned fieldwork – assessing landscape health by looking at it on the ground. More significantly, relying upon satellite data masks the devastating impacts of decades of land abuse BLM has permitted.

The rosy picture painted with satellite data sharply contrasts with BLM’s on-the-ground readings. Agency field data indicates more than half of allotment acres fail land health standards, with livestock overgrazing identified as a significant cause. This means an area of 54 million acres, roughly the size of Wisconsin, does not meet minimum standards for water, soil, and native flora, as well as quality wildlife habitat.

Nonetheless, permits for many of these allotments – including hundreds of those in Montana – have just been renewed for another decade with no pre-conditions.

“Satellite data does not excuse BLM from making a serious commitment to fieldwork and empowering its range staff to address vast areas failing to meet bare minimum standards for landscape functionality,” remarked Rocky Mountain PEER Director Chandra Rosenthal.



PHOTO: NASA

Get Along, Little Sensor. BLM is increasingly using “remote sensing” to replace on the ground assessments of land health.

Climate Blind Spot Persists

Despite claiming climate change is a top priority, the Interior Department continues to operate its largest program – commercial livestock grazing – without even assessing, let alone mitigating, its major adverse climate effects. This program is huge, with 18,000 permits covering an area equivalent to California and Oregon combined.

These lands provide forage for 1.5 million cattle, greatly decreasing these lands’ ability to sequester carbon. Yet, BLM

still conducts environmental reviews that do not assess any climate impacts, contrary to clear legal mandates.

PEER is pressing the Biden administration to follow its rhetoric by mitigating deleterious climate change repercussions and managing rangelands to act as carbon sinks to absorb atmospheric releases. This also means overdue steps to increase soil resilience and to stem livestock’s role in spreading invasive plants, wildfire vulnerability, and desertification.

BUREAU OF LAND MANAGEMENT

To Reap, America Must Sow

The U.S. Bureau of Land Management (BLM) manages approximately 10% of the nation's land base. A key resource in managing these vast tracts is its wildland native seed collections. Yet, BLM insiders are raising concerns about the agency's seed management system, including:

- Systemwide vulnerability to seed theft and poaching;
- Inadequate storage, including poor warehouse conditions threatening seed viability; and
- Lack of protection against overharvest of native seeds by private contractors.

Part of their diagnosis is the agency's "Seeds for Success" program does not have a sufficient budgetary or management commitment. One measure is that BLM employs only a fraction of the number of botanists versus wildlife biologists, yet states handle most wildlife management issues on BLM lands whereas BLM alone is responsible for maintaining its vegetative base.

PEER will be working in the coming months to address these and related concerns. As part of that effort, we will also strive to raise



PHOTO: UNSPLASH

Unsecured Resource. BLM's ability to ensure a reliable supply of native seeds to meet national needs is in question.

the visibility of BLM's native seeds program and the pivotal role these resources play in enhancing the ecology of the West.

Conservation Confusion

BLM has unveiled a dramatic proposal, called the Public Lands Rule, to elevate conservation to equal status with the agency's traditional "multiple uses" of drilling, mining, logging, and grazing. The idea of conservation as a "use" takes some getting used to and raises unanswered questions, such as:

- To measure conservation, BLM wants to extend the land health standards it now uses to assess grazing to all its lands. As seen in the opposite page story, BLM does an abysmal job of range management. It does not require allotments with failing landscape health grades to take steps to improve landscape health. So, why expand a dysfunctional system?
- Leasing public lands for conservation and mitigation purposes is like creating a market for carbon offset. Would this mean oil and mining interests could lease vacant land to "offset" adverse

climate impacts and other damage they are wreaking on their original holdings?

- Does a conservation lease convey privileges or a quasi-property right to a corporation which then controls many aspects of the land's use?
- Will the public have any opportunity to weigh in on conservation leases? BLM now renews many grazing leases (for another ten years) without public notice or comment.
- One of the only things made clear is that BLM will not allow a conservation lease to retire a livestock allotment, no matter how overgrazed. If BLM considers livestock forage as a conservation use, where is the conservation benefit?

Conservation clearly needs a boost at BLM. But the purpose, scope, and implementation of this proposed conservation rule need further clarification. The current

leadership at BLM seems to believe it can run before demonstrating that it can even walk. If it cannot competently manage its grazing program, why should anyone have confidence it can operate a far more sophisticated management regime?

Further, properly implementing this sophisticated new function would take a massive influx of funds that no one is proposing. Additionally, it would require a far greater level of management transparency than BLM has ever exhibited.

BLM historically has been special interest dominated, deservedly nicknamed the Bureau of Livestock & Mining. Giving BLM more discretion may simply trigger a new corporate land grab, leaving little to ensure they are managed to provide real conservation value or public benefit.



PEER PERSPECTIVES

Climate Change is just a Word



Ohio State Senator Jerry Cirino

Chair of the Senate Higher Education Committee, Cirino is a lead sponsor of the “Higher Education Enhancement Act” to combat what he sees as rampant “indoctrination” in the Buckeye State’s public colleges and universities. Among other things, the bill, which is barreling through the Republican-dominated Legislature, would forbid professors from taking official stances on “controversial beliefs or policies.” Climate change is the first topic defined as “controversial,” along with sustainability, systemic racism, gender identity, social justice, abortion, and diversity. Above all, the bill strives to protect what it terms “intellectual diversity.” There is an old saying, “You can’t fix stupid,” but you may soon be able to teach it in Ohio.



Pierre Rabadan, Deputy Mayor of Paris

Considered by many the most romantic river in the world, the Seine is quite fetid. Swimming in the Seine was banned in 1923. But in its winning bid for the 2024 Summer Games, organizers promised a waterway clean enough for Olympic swimmers and divers and later ordinary Parisians. Implementing “the Swimming Plan,” Paris is installing thousands of underground pipes, tanks, and pumps to prevent damaging bacteria from flowing into the river, particularly during storms, at a cost of over \$1.5 billion. Overseeing it all is Deputy Mayor Rabahan, who cautions, “Do we have a 100 percent guarantee? The answer is no. If it rains for a week continually before the races, we know the quality of water –even with all the work that has been done – probably won’t be excellent.” In that case, water events will be postponed until the water is clean enough. As Rabadan points out, there is no alternate plan.



U.S. Navy Vice Admiral John Wade

In what is perhaps the most significant environmental crisis to hit the Hawaiian Islands, major fuel leaks from the Navy’s massive World War II era Hill Bulk Fuel Storage Facility have contaminated the aquifer serving as the primary water source for Oahu. The leaks have poisoned drinking water for thousands of military families, causing illnesses and forcing many from their homes. As the responsible party, the Navy is leading the cleanup and defueling of the facility and has created a “Joint Task Force -Red Hill.” It has even commissioned a campaign emblem for the new unit, featuring a silhouette of the Islands above green mountains and blue sky with a shield embellished with two laurels to signify its “steadfast commitment” to the Hawaiian people. “With our unit patch, I feel like we’re officially unified and one team,” declared task force commander Vice Adm. John Wade. What the Navy has not done is dedicate resources to combat its systemic environmental negligence and misconduct.



Montana State Senator Greg Hertz

The Republican-controlled legislature is pushing any bill to promote fossil fuels, including a proposed tax on nonprofits that file lawsuits to enforce state and federal pollution laws. Authored by Hertz, an accountant, it would impose a 6.75% state tax on expenditures used in any such suit. Opponents pointed out that the bill was an unconstitutional restraint on the ability to petition for redress of grievances and an administrative nightmare. They also cited PEER’s 2009 suit against the U.S. Environmental Protection Agency (EPA), which forced the agency to reveal details about the botched asbestos cleanup in Libby, MT where hundreds of residents died. Nonetheless, Hertz contended that these eco-suits were bad because they are “disrupting lifestyles here in Montana.” Fortunately, his colleagues rejected his view that Montana stands for the freedom to pollute, and his bill died.



U.N. General Assembly President Csaba Korosi

United Nations delegates have agreed on a new high seas treaty protecting 30 percent of the world’s oceans by 2030. Currently, only 1.2 percent of the high seas are protected. The pact among 190 member states took nearly 20 years of talks. While the final text is not complete, the central concept is the creation of new marine protected areas in which vast oceanic swaths would be off-limits to industrial fishing and deep-sea mining. General Assembly President Csaba Korosi called the treaty “a massive success for multilateralism.”



Florida Representative Lawrence McClure

A byproduct of phosphate rock mining for fertilizer, phosphogypsum is nasty stuff. It is the waste from dissolving rock in acid. It then decays to radium which off-gases as deadly radon. For 30 years, EPA has outlawed its use as an “additive” for road building due to risks to construction workers, public health, and the environment. In his last year in office, Trump tried to lift that ban, but after a lawsuit by PEER and other groups, EPA reversed course. Undeterred, Mosaic, a Tampa-based mining company, has pumped money into Florida Republican campaign coffers in an effort to turn this ultra-hazardous waste lemon into Sunshine State lemonade. One of the biggest recipients, Rep. McClure, has moved a bill to authorize “demonstration projects” to test using phosphogypsum on Florida highways. While it is unclear whether this new scheme will pass federal muster, Mosaic has also given a lot of money to Gov. Ron DeSantis, who obligingly signed McClure’s bill into law and now aspires to an office that picks the next head of the EPA.



DEVELOPMENT

This Summer, Make Some Waves, and Double your Impact



Darrell Carrington,
Chair, PEER Board
Development Committee

On behalf of PEER's development committee, I am honored to extend an invitation to you to join supporters from all over the nation in our Double Trouble Campaign this summer.

By participating in this campaign, you can contribute to the support of environmental whistleblowers, scientific transparency, and public employees throughout the country. Thanks to the generosity of dedicated PEER supporters, any gifts made to PEER between June 21st and September 22nd will be doubled!

We encourage you to use the QR code provided to invite your friends to make their first gift to PEER. This way, their support will be leveraged even further, as all new gifts to the organization will be matched 2:1!

Public employees often find themselves facing corruption within their agencies and are compelled to stand up for the truth. Whistleblowers and anonymous activists put their careers and livelihoods at risk to protect the environment. Your gift this summer enables us to provide pro bono legal services, ensuring that governments at all levels are held accountable.

Join us in making waves and doubling your impact!

Here's how you can join the Double Trouble Campaign:

1. Make any gift during the summer, and it will be matched 1:1.
2. Make a new gift during the summer, and it will be matched 2:1.

Double Trouble



<https://peer.org/donate>



We Thank You!

*We want to express our immense gratitude to the **19 new donors** who have supported PEER this quarter. Your investment in our work is deeply appreciated. Additionally, we would like to extend our heartfelt thanks to the following foundations for their continued support:*

- ReMain Nantucket
- The Lisa and Douglas Goldman Fund
- The Joseph Robert Foundation
- CERES Trust
- Park Foundation

PEER Community Survey

We are delighted to inform you that we have received over 250 survey responses from the PEER community. Your feedback, ideas, and suggestions for improving our work with environmental whistleblowers across the country are greatly appreciated. Thank you for your valuable input! To learn more, please check out the survey summary at peer.org/community-survey-2023-results or scan the QR code here.



Celebrating 30 Years of PEER

Help us celebrate our 30th Anniversary by sharing your story and telling us what your hopes are for PEER for the next 30 years. Visit our 30th anniversary page to submit your story, read supporter testimonials and learn more about how PEER began. Join us!

Visit <https://peer.org/about-us/30th-anniversary/> or scan the QR code.





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DEFUSING ALASKA'S HEAVY OIL CLIMATE BOMB — Continued from page 1 ►

mounting maintenance burden on its aging system. A significant percentage of its workforce believes that a serious incident is imminent, according to a recent survey by the consortium of TAPs operators.

In short, how TAPS is managed may hold the key to America's climate future. A massive increase in oil production from Alaska needed to keep TAPS operational through the 2050s is entirely incompatible with our national climate goals under the Paris Agreement. We can no longer afford to wait much longer to prevent the launch of this calamitous climate mega-bomb.

Nonetheless, the U.S. has not seriously assessed the potential impact of climate change on TAPS, nor the impact of TAPS on climate

change. PEER is asking the Biden administration to include consideration of the climate impacts of adding Enhanced Oil Recovery to the nation's climate planning. We cannot continue looking at Alaska on a project-by-project basis, as was done with the Willow Project. We need a holistic overview that considers all of these unexamined factors.

We are also requesting that the Biden administration immediately initiate a Supplemental Environmental Impact Statement process for TAPS, taking into account all potential climate impacts, and specifically assessing the effects of the billions of barrels of heavy oil that would be transported through the massive aging Alaska pipeline through mid-century.



America's White Elephant. By law, Alaska is required to remove all traces of the pipeline after oil extraction is complete.