



**PEER**  
PUBLIC EMPLOYEES  
FOR ENVIRONMENTAL  
RESPONSIBILITY



2023

ANNUAL REPORT





## THANK YOU FOR 30 YEARS OF PEER

Dear Friends,

As we wind up our year-long celebration of PEER's 30th anniversary, I would like to thank all of you who have reached out to share your reflections on what makes PEER a special organization. I'm inspired by the dozens of testimonials that demonstrate PEER is making a difference in the lives of public employees.

PEER is a truly unique organization because of its mission, its passionate and dedicated Board of Directors, staff, and most importantly, the countless civil servants who come to us in need of help or with important ideas about how our institutions can better protect the environment.

This year, together, we have had some remarkable successes and helped lay the groundwork for consequential reforms in many federal and state agencies.

For example, our long-term and relentless work compiling government data on the health of our western lands is exposing big problems in the Bureau of Land Management's stewardship of western rangelands and leading to important reforms at the agency (see page 6). This will lead to greater climate resiliency and help protect biodiversity.

Our chemicals work is challenging the industry's hold on the U.S. Environmental Protection Agency's decision-making process. Working with government insiders at the federal, state, and local levels, we are bringing reforms to the agency that will lead to better health outcomes for both people and wildlife.

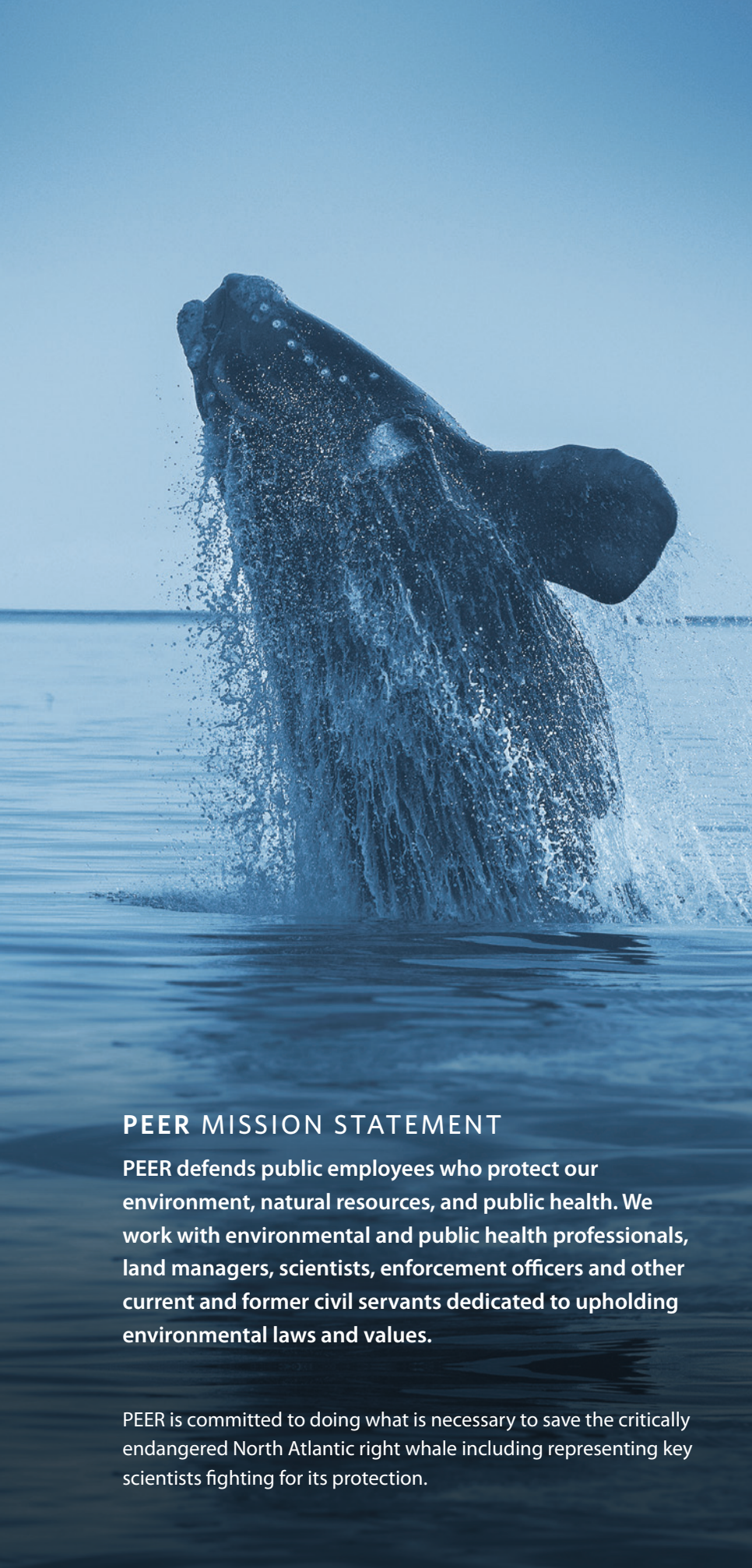
We are particularly proud of our success in helping Dr. David Carpenter, a long-tenured professor and the founding Dean of the University at Albany's School of Public Health, fend off an underhanded effort by the chemical giant Monsanto to impugn his integrity and oust him from his position at the University of Albany (see page 8). Our work not only led to Dr. Carpenter's restoration of teaching privileges but also sent a warning to other universities that PEER is standing up for academic independence.

There is so much more we have accomplished. I hope you will take a moment to read and enjoy our Annual Report.

When I look back on our work and think about our future, it is clear how important our incredible community of supporters has been to our success not only this past year but for the last 30 years. PEER's work requires a high degree of dedication and persistence. We couldn't do it without you. Thank you for being part of our community, for your financial support, and for joining us on our important journey in the years ahead.

A handwritten signature in blue ink that reads "Timothy Whitehouse". The signature is fluid and cursive, with a long, sweeping underline.

Timothy Whitehouse  
Executive Director



## PEER MISSION STATEMENT

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

PEER is committed to doing what is necessary to save the critically endangered North Atlantic right whale including representing key scientists fighting for its protection.

### STAFF

**Tim Whitehouse**, Executive Director  
**Paula Dinerstein**, General Counsel  
**Peter Jenkins**, Senior Counsel  
**Monica Mercola**, Staff Counsel  
**Laura Dumais**, Staff Counsel  
**Colleen Teubner**, Litigation and Policy Attorney  
**Kyla Bennett**, Director of Science Policy and Northeast and Mid-Atlantic PEER  
**Chandra Rosenthal**, Director, Rocky Mountain PEER  
**Jeff Ruch**, Director, Pacific PEER  
**Helen Jenkins**, Director of Development and Communications  
**Claire Turner**, Development Manager  
**Mer Mietzelfeld**, Institutional Giving Manager  
**Elizabeth Duan**, Communications and Office Associate  
**Barry Sulkin**, Technical Consultant

### BOARD OF DIRECTORS

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**Louis Clark**, Vice Chair  
**Darrell Carrington**, Chair Development Committee  
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# 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 nonprofits within our areas of expertise.
- 5 ELEVATE lesser heard voices.** Finding solutions to environmental problems requires the involvement of disadvantaged and disempowered communities. PEER works with current and former government employees to elevate the voices of individuals, communities, and local coalitions often left unheard.



“As a new employee, I was drawn to the wide range of environmental issues PEER takes on from climate change and biodiversity loss to toxic chemicals and pollution. PEER’s unique approach includes national, state, and local initiatives. To achieve our goals, we work with a diverse group of foundation partners who each bring support and awareness to environmental threats at different scales.”

Mer Mietzelfeld, Institutional Giving Manager

## PEER’s Diversity Equity and Inclusion Statement

Explore PEER’s Diversity Equity and Inclusion Statement that informs how we work with individuals and communities across the US.

Explore our DEI Statement at <https://peer.org/about-us/> or scan the QR Code.



# OUR WORK

## Protecting Public Employees Who Protect the Environment

*PEER supports current and former public employees who seek greater environmental protection and scientific integrity within their agencies. This past year, we have continued our defense of environmental whistleblowers and our work with anonymous government activists throughout the country.*

### DEFENDING WHISTLEBLOWERS

Most of PEER's work with whistleblowers is confidential. Our job is to defend employees and address the underlying issues they raise. Here are some important updates on a few of the cases involving whistleblowers represented by PEER:

For the past three and a half years we have represented scientists from the U.S. Environmental Protection Agency (EPA) who have reported in detail how managers regularly delete hazards and risks associated with new chemicals in order to rush these chemicals onto the market. These improper risk assessments have deep implications for human health and the environment. This year, EPA's Inspector General (IG) released a report validating many of our client's concerns. EPA has promised to implement the IG's recommendations for reform. In the coming year, the IG will release additional reports and recommendations concerning the whistleblower complaints made by our clients. We will be working overtime to make sure these recommendations are implemented.

**Get updates on two of our other whistleblower cases by watching these short videos from Evi Emmenegger and Peter Corkeron discussing their experience with PEER.**

Blowing the Whistle on Biosafety, Evi Emmenegger



Fighting to Save the North Atlantic Right Whales, Dr. Peter Corkeron



"In our society, whistleblowers matter now more than ever. They provide an integral part of the free flow of information to the public about government goals and operations at a time when government agencies and civil society are under attack. That is why defending public employees who report wrongdoing is the most important thing PEER does."



Paula Dinerstein, General Counsel

### SUPPORTING ANONYMOUS ACTIVISM

In most situations, whistleblowing may not be the best course of action. There may be effective alternatives for government employees to expose wrongdoing without jeopardizing their jobs. That is why PEER acts anonymously on behalf of employees to:

- File document requests and sue the government when they refuse to release those documents.
- Conduct employee surveys to help identify and address problems in government agencies.
- Publish documents that the government agencies want to keep hidden.
- Ask oversight bodies to investigate illegal government actions.

Much of PEER's work highlighted in this Annual Report is the result of PEER staff working with anonymous government employees to address the failings within their agencies.

# OUR WORK

## Climate Integrity and Combatting Climate Change

*PEER works hard to combat climate change through a wide range of initiatives. In the past year, we have built our Climate Integrity Program to support meaningful efforts to increase clean energy production, expose false climate solutions, and preserve nature and biodiversity.*

### Keeping Clean Energy Clean

In Maryland, we have helped expose and limit the use of dirty energy in the state's renewable electricity program, such as burning trash and wood to produce electricity.

We also successfully petitioned the state to increase the transparency in the state's Renewable Portfolio Standard. This will allow people to better evaluate the success of this program and allow us to advocate for greater transparency in other state clean energy programs by using Maryland as a model for what can be done.

*"PEER's successes in Maryland and Colorado are models for accomplishing tangible climate progress in other states."*

Tim Whitehouse, Executive Director

Nationally, PEER has led a coalition of over 300 other groups who have petitioned the U.S. Environmental Protection Agency (EPA) to require all waste-to-energy incinerators to report their toxic emissions to EPA's toxic emissions database called the Toxic Release Inventory.

This petition is significant because industry often claims that the energy produced from these incinerators should get federal and state subsidies for being "renewable" and is a tool to fight climate change. In fact, burning waste is one of the most toxic ways to make energy and is not clean or green. The public has a right to know the toxic emissions from all energy sources.

### Stopping Fossil Fuel Development

In Alaska, we are working to block the use of enhanced oil recovery, a process that would enable the production of 20 to 30 billion barrels or more of previously inaccessible heavy oil on Alaska's North Slope alone. This would unleash an enormous commitment to a fossil fuel future, bigger than the Willow project, a massive oil drilling venture on Alaska's North Slope. We are also asking the Biden administration to immediately initiate a Supplemental Environmental review of the Trans-Alaskan Pipeline System that considers all potential climate impacts.



"The world is in a climate crisis. PEER recognizes that climate change is the result of ecological overreach that governments must

address by taking decisive action to end our reliance on fossil fuels and protect our ecological systems."

Professor Rick Steiner, Board Chair and Marine Conservation Biologist

### Improving Permitting and Air Monitoring

In Colorado, PEER represented four state whistleblowers who exposed wrongdoing in the state's air modeling program to benefit large, polluting industries. We are watchdogging state and federal agencies to make sure this does not happen again. Parts of Colorado have some of the dirtiest air in the country. Cleaning up pollution and fighting climate change is a win-win proposition. That is why we are pushing the state to continue to reform its air permitting processes, streamline and strengthen its air quality regulations, and address how air pollution permits impact environmental justice communities. We have made notable progress and will continue this work in the year ahead.

PEER also joined with allies in petitioning EPA to regulate flaring on oil and gas wells throughout the state, emphasizing the need to curtail harmful emissions from these sources. Additionally, PEER has joined a national petition asking EPA to strengthen its ambient air quality standards.

*Protecting intact ecosystems is the best tool for fighting climate change. That is why our public lands and wildlife work is so inextricably linked to our climate work.*



# OUR WORK

## Protecting Public Lands and Wildlife

*Conserving natural ecosystems provides a dual benefit of storing carbon from greenhouse gas emissions and protecting biodiversity. Climate change is a major contributor to species extinction, thus effective land management is critical to addressing these interconnected environmental threats.*

### Improving the Health of Our Public Lands

PEER works to improve the land health of America's vast rangelands, which are plagued by a badly mismanaged livestock grazing program and deference to the wishes of the oil and gas industry. We filed a national lawsuit to address overgrazing on lands failing minimum federal landscape health standards for environmental quality. We also stopped a misguided effort by the Bureau of Land Management (BLM) to confine range health assessments to satellite data, which will lead to better ground-truthing of land conditions.

We have also ramped up our efforts to protect the Greater Sage-Grouse and other bird species by exposing how the BLM in Wyoming routinely issues waivers for habitat protections for the benefit of the oil and gas industry. We have asked the Department of the Interior's Inspector General to investigate BLM's actions and are working with our partner organizations to change these practices.

### Protecting Parks for Future Generations

Employees and community groups come to us regularly with concerns about the management of our national park system. Our recent work has focused on protecting parks from excessive commercialization.

Our lawsuits against the National Park Service (NPS) and the Federal Aviation Administration continue to bear fruit as major parks throughout the West and in Hawaii curb or end excessive air flights for tourists in helicopters and small planes over national parks.

We are also fighting the encroachment of telecommunication infrastructure into park wilderness areas and pushing the NPS to rescind Trump-era policies that have cut the

public out of decision-making and minimized environmental reviews of this type of development. We are defending one of America's newest parks – Tule Springs Fossil Bed National Monument by showing that a proposed electric transmission corridor would destroy irreplaceable Ice Age fossils.

### Protecting Marine Mammals and Predators

Three whale species in U.S. waters are on the brink of extinction – the North Atlantic right whale, the North Pacific right whale, and the Rices's whale. These losses would be the first such extinctions in modern times. Working with experts, PEER developed a national strategy to avert whale ship strikes—a major cause of death in these species. We are petitioning the National Oceanic and Atmospheric Administration to implement this plan immediately.

In addition, PEER exposed the biggest aerial shooting of wildlife in Alaska's history including nearly 100 brown bears, five black bears, and five wolves. That revelation sparked a new drive to force the Department of the Interior to adopt PEER's rulemaking petition to end federal subsidies to state game agencies that engage in excessive lethal removals.



"Biodiversity is crucial in providing the resilience our planet needs in the face of the climate crisis. Protecting public lands and stemming the loss of nature are some of the most important ways we can do this."

Chandra Rosenthal, Rocky Mountain PEER Director



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# OUR WORK

## Reducing the Use of Toxic Chemicals

*Government agencies are failing to protect us from dangerous toxic chemicals. We work with concerned scientists to fight for greater protection from chemicals that can harm humans and wildlife. PEER is making steady progress in our work to expose the effects of toxic chemicals on public health and improve the safety net to protect us from dangerous toxins.*

### Stopping the Flow of Forever Chemicals

A significant portion of PEER's chemicals work focuses on closing exposure pathways from a toxic class of chemicals called per- and polyfluoroalkyl substances known as PFAS or "forever chemicals." We believe that the United States should ban all but essential uses of PFAS and regulate all aspects of the production, use, and disposal of these chemicals.

Partnering with the Center for Environmental Health, we sued a major manufacturer to remove PFAS from the lining of millions of plastic containers. The PFAS in these containers leaches into the contents across a spectrum of industrial, agricultural, and consumer products. Our PFAS testing program has revealed extensive levels of PFAS in biosolid fertilizers, pesticides, and artificial turf and helped lead to important actions across the country to stop the spread of this toxic class of chemicals.

We have also partnered with local groups across the country to stop the placement of artificial turf in sensitive ecological areas because of the potential for PFAS contamination from this turf and harm to nearby waterbodies from runoff. We strongly support the use of natural grasses for surfaces in playing fields and parks.

**PFAS** are a class of man-made chemicals widely used in consumer products, industrial processes, and firefighting foams. The chemicals have drawn international concern as high levels of PFAS are showing up in humans and wildlife, drinking water, and food sources.

Local, state, and federal government employees come to us regularly with concerns that their agencies are not working hard enough to protect us from these dangerous chemicals. PFAS are extremely persistent and mobile in the environment and have been associated with a host of serious health effects, from developmental problems to cancer.



### Eliminating Pollinator-Killing Insecticides

PEER is pressing to eliminate potent pollinator-killing insecticides from agricultural use. We worked with the American Bird Conservancy to spearhead a regulatory filing with U.S. Environmental Protection Agency (EPA) on behalf of 65 non-profit groups proposing major reforms in the way the agency regulates systemic insecticides with a focus on the neonicotinoids, which have caused excessive honeybee deaths and bird mortalities since their introduction more than 20 years ago.

### Bringing Transparency to the Environmental Protection Agency

We also helped organize more than 300 groups to join our petition to reduce our exposure to harmful chemicals from 400 incinerators burning industrial, medical, municipal solid waste, and sewage sludge, as well as pyrolysis (the process of burning plastic for energy) and gasification units that spew toxic ash and gases that contaminate lands, waters, and our lungs.

Our petition asks the EPA to require these facilities to report their toxic emissions to the federal Toxic Release Inventory (TRI). TRI tracks the management of toxic chemicals that may pose a threat to human health and the environment and helps support informed decision-making by companies, government agencies, non-governmental organizations, and the public.



# OUR WORK

## Safeguarding Scientific Integrity

*Public agency scientists are often under political pressure to alter, dilute, or suppress their findings on controversial issues. Our work seeks to safeguard scientific integrity at both the individual and institutional levels.*

### Defending Academic Freedom

In one example of our scientific integrity work, we successfully fended off a chemical industry scheme to stop the research of one of the nation's most respected environmental scientists on the health effects of polychlorinated biphenyl (PCB) exposure –Dr. David Carpenter, a long-tenured professor and founding Dean of the University at Albany's School of Public Health.

PCBs are a group of chemicals that cause cancer in animals as well as a number of other serious impacts on the immune system, reproductive system, nervous system, endocrine system, and other health effects.

After Monsanto started requesting documents from the University of Albany, Dr. Carpenter was put on leave by the University without explanation. Our academic freedom complaint to the University Senate resulted in the restoration of his faculty privileges and a complete vindication by the University of any wrongdoing on Dr. Carpenter's part.



Promoting scientific integrity in government is an important priority for PEER supporters

### Protecting Government Science

On an institutional level, we are deeply involved in the effort to strengthen federal scientific integrity policies which have failed to protect scientists from political interference in both Republican and Democratic administrations. We are leading an effort by a group of scientific, environmental, and public health organizations to ensure adequate safeguards are in place to protect scientists in federal agencies whose findings contradict the desired outcomes of agency managers. This is important issue because the Biden administration has proposed a model scientific integrity policy for federal agencies to adopt. The goal of this model policy is to prevent improper political interference of the sort that had occurred during the Trump presidency. While the model policy adapts many of the recommendations made by PEER, it also has many serious problems, such as imposing major restrictions on when scientists can speak publicly about their work. As the only organization that represents scientists in filing scientific integrity complaints, we offer a unique and important perspective on this issue.



### Protecting Academic Independence from Corporate Attacks

Dr. David Carpenter



Watch Dr. Carpenter's testimonial video by scanning the QR code.

# PEER THANKS YOU

## Foundation Partners

Anderson-Rogers Foundation  
Bay & Paul Foundations  
Ceres Trust  
Change Happens Foundation  
Cornell Douglas Foundation  
Denver Foundation  
Dudley Foundation  
Firedoll Foundation  
FJC – A Foundation of Philanthropic Funds  
Glaser Family Foundation  
I.L. Cohen Foundation  
Joseph Robert Foundation  
Lisa and Douglas Goldman Foundation  
Martin Foundation  
New-Land Foundation  
Normandie Foundation  
Park Foundation  
Community Foundation for Nantucket's ReMain Nantucket Fund  
Seattle Foundation  
SWF Immersion Foundation  
Tortuga Foundation  
Virginia Wellington Cabot Foundation  
Winky Foundation

## CAPT. ED DAVIDSON | Florida

After starting out as a country kid boy scout, camping, hunting, and fishing in the hill country of rural western New York state, I went to engineering school on scholarships and became a Navy fighter pilot who survived more than 200 combat missions in the skies over Vietnam, Laos, Thailand, Cambodia, and the South China Sea.

After that aerial survey of millions of acres of subtropical environments in various stages of alteration and development, the Navy sent me to the Florida Keys. I started scuba diving and fishing and became rapidly familiar with the vulnerabilities of that unique subtropical environment which was under heavy and increasing pressure from real estate developers and their political enablers.

After resigning from my commission as a Navy Lt Commander, I became President of the Keys Audubon Chapter, and founded the Florida Keys Citizens Coalition to begin filing lawsuits against the powerful over-development interests, and later became Chairman of the Keys-wide Zoning Board and Comprehensive Plan Drafting Committee.

By the time those development interests ran the County Commissioner who appointed me out of office, I was on the Board of Directors of the Florida Audubon Society, of which I later became the Chairman. During that period, I testified as an expert witness in more than 25 local, state, and federal environmental legal challenges, and held the lead environmental seat on the original South Florida Water Management District Advisory Committee that formulated the Everglades/South Florida environmental restoration master plan.

That led to my initiating the largest Endangered Species suit in Florida history, against condo and resort developers who were attempting to add nearly 45,000 new residents to North Key Largo. During this time, I was I was delighted to discover that there was a national organization gathering teams of issue-knowledgeable former government agency lawyers and whistleblowers to do on a national scale what I had spent years attempting as a private citizen. I started donating to PEER everything I could, to help fund that sorely needed crusade to protect the public eco-inheritance of future generations for the grandchildren of America.

I'm happy to report that my efforts paid off, and with PEER's advice and guidance, roughly 6,000 acres of Key Largo have been transferred to public ownership as part of the Florida Park System and the National Wildlife Refuge System.



**PEER**

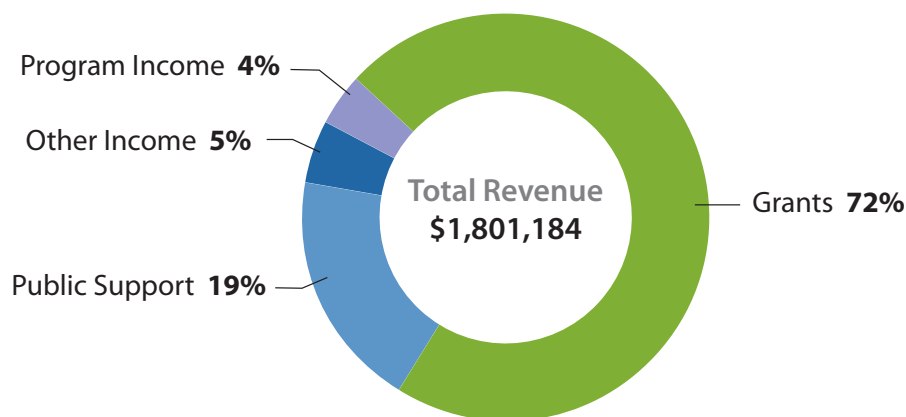
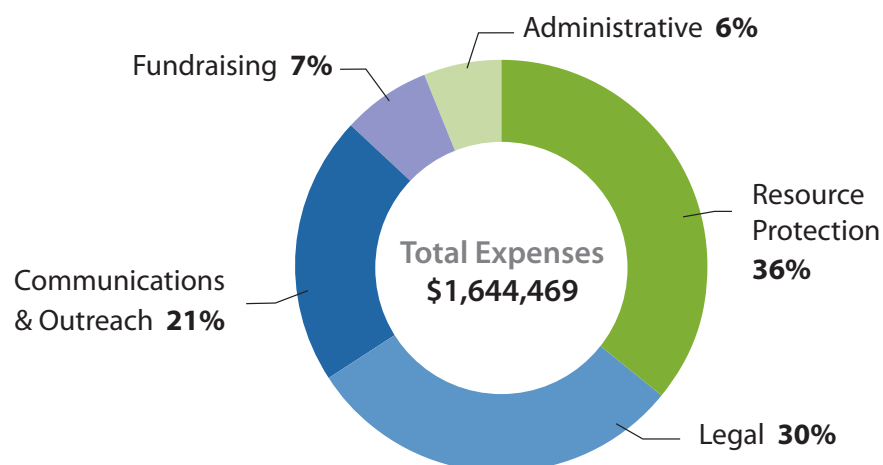
was supported by

**752**

individual donors  
this calendar year



# FINANCIAL STATEMENT



**ASSETS**      \$ 846,006.44

**LIABILITIES**    \$ 136,495.77

These financial results are unaudited and rounded to the nearest dollar. Please visit our website at [www.peer.org](http://www.peer.org) for complete audited financials that are GAAP compliant. The October 2022-September 2023 audited financial statement will be posted on our website in March of 2024.



PEER is committed to financial transparency and careful stewardship of our supporter's investment in the organization. We are proud to hold Charity Navigator's highest rating for fiscal responsibility and ethical practices.

**Platinum  
Transparency  
2023**  
**Candid.**

PEER is proud to hold Candid's Platinum Transparency Rating

## Giving Stock or Distributions from your IRA is Easy!

### IRA Gifts

If you are 70 ½ years old, you can give up to a maximum of \$100,000 per year from your IRA directly to a qualified charity like PEER without having to pay income taxes on the money.

### Stocks and mutual funds

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

Learn more  
at [peer.org/  
donate/ways-  
to-give](http://peer.org/donate/ways-to-give)





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*PEER works to expose agency corruption which leads to the destruction of the fragile habitat of the Greater Sage-Grouse in the American West. © AdobeStock\_Nattapong*

## Thank You for Supporting Environmental Whistleblowers

This year has been unprecedented in the number of cases that PEER took on to expose agency corruption, environmental violations, and the defense of public employees. The PEER community has been generous with its time, expertise, and financial contributions. We are grateful for your steady support and unwavering confidence in PEER.

If you are interested in making an investment in PEER, you can do so at [peer.org/donate](http://peer.org/donate). Thank you for joining us in this effort.

### CONTACT:

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