



PEERreview

A Publication of Public Employees for Environmental Responsibility

The Park Service Is a Stress Test for Democracy

PEEER has been at the forefront of exposing the destruction and self-dealing that are devastating the ability of the National Park Service (NPS) to manage our national parks for all Americans and for future generations.

There are many reasons this is happening — a major one is that, as President Trump races to leave his mark on Washington, NPS, like many federal agencies, is paying the price for his managerial incompetence and vanity.

Trump DC Monument Mayhem

From bulldozing the White House East Wing to build an outsized ballroom to plans for a massive triumphal arch, Trump is determined to reshape the nation's capital before his time in office runs out.

Department of the Interior Secretary Doug Burgum, who has centralized control over all Interior bureaus, including NPS, has worked to make this happen regardless of what the law, regulations, or congressional appropriations require.

He has greenlighted every project and bypassed every review. Here are a few examples:

Lafayette Park

At Lafayette Park, NPS awarded a no-bid contract to renovate the fountain—justified as an “urgency”—to the same contractor working on Trump’s ballroom. The supposed urgency: finish the project by the Fourth of July. The cost has since ballooned to more than three times the government’s own prior estimate of \$3.3 million and is likely to go much higher.

East Wing Debris

Secretary Burgum permitted demolition waste from the White House East Wing—reportedly containing asbestos and other hazardous materials—to be dumped on an NPS golf course. The hazard has yet to be independently assessed.

The Reflecting Pool

The failed upgrades to the Lincoln Memorial Reflecting Pool have become an international embarrassment for the administration as tens of millions of taxpayer dollars are wasted on Trump’s idea to paint the pool blue and get rid of the algae by calling in his “pool guys” for no-bid contracts to do the work.



PHOTO: US SENATE

Tim Whitehouse, PEER Executive Director, testifying before a senate subcommittee on the political and financial hijacking of our nation's anniversary (see page 2).

These are just a small sampling of Trump’s vanity projects. Other projects in the works include the Arc de Trump—a 250-foot-high monument that will stand outside of Arlington National Cemetery; the Garden of Heroes; and the upgrading and privatization of a public golf course near the National Mall.

Robbing Parks to Pay for Vanity Projects

All of this does not come without a cost. According to a recent story in *The Atlantic*, between December 2025 and March 2026, more than 90 percent of NPS’s eligible recreation fee funds went to D.C.-based projects. The diversion amounts to nearly \$1 billion, forcing the cancellation of more than 900 Park Service projects across the country.

Cutting Park Budgets

Meanwhile, the administration has proposed cutting the overall NPS budget by 26 percent— \$760 million—while simultaneously requesting \$10 billion for a “Presidential Capital Stewardship Program” for Washington



PEER DC Headquarters

962 Wayne Avenue, Suite 610
Silver Spring, Maryland, 20910
tel: 202-265-PEER (7337)
fax: 202-265-4192
email: info@peer.org
website: peer.org

PEER Staff

Tim Whitehouse • *Executive Director*
Joanna Citron Day • *General Counsel*
Paula Dinerstein • *Senior Counsel*
Tony Irish • *Senior Counsel*
Aaron Lloyd • *Senior Counsel*
Jeff Ruch • *Senior Counsel*
Laura Dumais • *Staff Counsel*
Colleen Zimmerman • *Staff Counsel*
Kyla Bennett • *Science Policy Director*
Chandra Rosenthal • *Western Lands and Rocky Mountain Advocate*
Barry Sulkin • *Technical Consultant*
Ben Glick • *Litigation Assistant*
Claire Turner • *Development Manager*
Mer Mietzelfeld • *Grants and Special Projects Manager*
Michelle Shaffer • *Digital Media Manager*
Nicole Bracey • *Human Resources & Office Manager*

PEER Board

Chair

Professor Rick G. Steiner (International Conservation and Sustainability Consultant)

Members

Alexandra Bueno (Attorney) • Christine D. Berg, M.D. (National Institutes of Health, retired) • Michele Boyd (former Department of Energy official) • Louis Clark (President, Government Accountability Project) • Ewell Hopkins (software and financial services) • Ben Lomeli (Bureau of Land Management, retired) • Jacob Malcolm (Next Interior) • Maria Brown M.D. (Physician, retired)

PEERreview is the quarterly newsletter of Public Employees for Environmental Responsibility

FROM THE EXECUTIVE DIRECTOR

The Scandal Around America's Birthday

Dear Friend,

The United States just marked its 250th birthday.

Unfortunately, what should have been a nonpartisan celebration in Washington, D.C., has instead become a growing scandal—one involving secrecy, political favoritism, and the diversion of significant taxpayer funds and resources to a private, Trump-run entity operating outside the oversight structure Congress created.

That's why I was honored to testify at the end of June before the Senate Judiciary Subcommittee on the Constitution at a hearing, *American Citizenship IV: America 250 and Reclaiming American Citizenship*.

One question I am often asked is why the executive director of a small environmental nonprofit was asked to testify at a hearing that seems, at first glance, so outside of PEER's mission. The answer is that PEER has been a driving force in uncovering and exposing the growing scandals around Freedom 250 and how it is impacting the mission and function of federal agencies like the National Park Service.

Some quick background—Freedom 250 is the Trump-aligned entity that has largely taken over the work of America250, the Congressionally chartered bipartisan commission set up to organize our nation's semiquincentennial.

Over the past eight months, PEER has helped expose how Freedom 250 is using government money and resources, largely from the National Park Service, to sell access to the president and turn these celebrations into political and fundraising events.

At the hearing, I laid out these pay-to-play politics and spoke about how our nation's 250th anniversary celebration should strengthen public trust in our democratic institutions, not degrade them into a political spectacle. I also emphasized the civic values we urgently need to reclaim as a nation include transparency, accountability, and oversight in government — and that we need to install guardrails against the current pay-to-play system of government and fight against corruption.

This testimony was an important statement on the principles that guide our work together during these unsettled times and our path toward accountability in government. You can watch my testimony at peer.org/freedom-250-testimony.

Tim Whitehouse

Executive Director

P.S. Join our summer of good trouble. Every dollar raised will be matched during our Double Trouble campaign now through August 22nd. See page 11 for more details.

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.

NEW AT PEER

Interior Solicitor Joins PEER

Tony Irish, a longtime attorney at the Department of the Interior (DOI), has joined PEER as its newest senior counsel. As an associate solicitor for general law at DOI, Tony handled the day-to-day administrative, operational, and business legal needs of the agency and provided advice on procurement, contract negotiation, federal grants, ethics, and information laws like the Freedom of Information Act.

This work spanned DOI's components, from land management agencies responsible for nearly one-fifth of America's land, including the National Park Service and Bureau of Land Management, to the Bureau of Safety and Environmental Enforcement, which oversees energy production on the outer continental shelf. Tony's primary client was the Office of the Secretary,

including wildland fire and public health offices, along with DOI leadership.

"Tony brings an unmatched understanding of how the Department of the Interior operates from the inside," said Joanna Citron Day, PEER's general counsel. "His ability to navigate complex legal frameworks and uncover whether internal agency decision processes actually comply with the law will significantly strengthen PEER's work."

"I am excited to join PEER and continue working on issues of transparency and accountability in government," said Irish. "Public service depends on trust, and that trust is built on openness, lawful decision-making, and the ability of employees to raise concerns without fear."



Tony Irish joins a growing cadre of government experts at PEER.

Honoring Whistleblowers



Night Out. PEER's General Counsel, Joanna Citron Day, and Senior Counsels Tony Irish and Aaron Lloyd at the annual banquet for the award of the Ridenhour Prizes for Truth-Telling. This year's awards went to Sharyn Alfonso and Bill Owens, both formerly of 60 Minutes, and Erez Reuveni, a former Department of Justice lawyer who oversaw litigation implicating immigration enforcement.

PEER's Board Welcomes DOE Veteran

We are thrilled to welcome Michele Boyd to PEER's board of directors. Michele brings more than 20 years of experience spanning government, nonprofit, and private-sector work on energy and environmental issues. At the U.S. Department of Energy, Michele held a leadership role in the Solar Energy Technologies Office, where she managed efforts to expand equitable access to solar energy and energy storage.

Earlier in her career, she worked in the private sector on financing and transmission policies that support clean energy development. Michele also spent 12 years leading watchdog and advocacy campaigns on energy and environmental policy in the nonprofit sector. She currently serves as a Senior Resident Fellow at the Solar and Storage Industries Institute.

"Michele's breadth of experience, from federal to private sector to nonprofit, makes her an invaluable addition to PEER's board," said PEER's Board Chair Rick Steiner. "We're excited to have her expertise and leadership as we continue our work to protect public employees and the environment."



Michele Boyd has an extensive background in energy policy, financing, and clean energy development.



NATIONAL PARK SERVICE

Growing Chaos in Understaffed Parks

PEER is playing a critical role in exposing the collapse of the National Park Service (NPS) under Interior Secretary Doug Burgum. We have done this by gathering information, briefing the press, and equipping political leaders with the facts needed to counter administration misinformation on the state of our national parks and their employees.

The situation at NPS is dire. Going into what may be a record-breaking summer visitation season, Burgum has positioned the national parks so that they are facing crippling staff shortages, paralyzing reorganizations, a lack of policies to mitigate overcrowding pressure, and a vacuum of leadership in the agency.

Crippling Staff Shortages

In the past 18 months, NPS lost around 4,000 people, or 22% of its entire workforce—and the number of departures is still growing. As the summer season approached, Secretary Burgum said NPS would hire 7,700 seasonal staff—in part to offset this dramatic drop in the permanent workforce. But it has fallen at least 33% short of that target.

Meanwhile, there are increasing reports of parks lacking the staff needed to hire, do background checks, or even onboard new staff. We have heard from frustrated candidates whose seasonal hirings have been delayed, moved, or simply cancelled. Amid growing confusion, it is hard to determine who is even empowered to make hiring decisions.

And that hiring process has been complicated by all job applicants being asked (but supposedly not required to answer) essay questions about how they would further the Trump policy agenda.

Disruptive Reorganizations and Policies

During this time of great loss, Sec. Burgum's office also absorbed almost all of the human resources, IT, administrative, and communications staff from all Interior bureaus. This has resulted in significant staff departures, compounded by a disruptive and unclear chain of command.



Serenity Now. Many national parks are ill-equipped to handle a big visitation season.

Adding to the chaos of understaffed and underresourced parks, the Trump administration is eliminating all policies to regulate visitor access. For example, this year, Arches, Glacier, and Yosemite announced they were either abandoning or cutting back policies to schedule or space out vehicle reservations. That has spawned traffic jams and congestion not seen since the pandemic era.

An Agency Without Leaders

As we enter the country's midterm elections, NPS is effectively rudderless. There is no confirmed NPS director, no confirmed Assistant Secretary for Fish, Wildlife & Parks, and no filled deputy director overseeing the park system.

NPS headquarters has roughly 70 vacant associate director slots, and more than 100 national park superintendent chairs sit empty across the country. The acting principal deputy, a Texas investment manager, lacks the statutory qualifications for taking the role permanently.

In short, every official currently making decisions about America's national parks, starting with Secretary Burgum, has zero experience managing them.

PEER Documents Lack of Savings and Efficiencies at Interior

Secretary Burgum's consolidation of all Interior communications staff under his office has resulted in chaos. Employees have been plugged into unfamiliar roles with no clear rationale, often without position descriptions and proper training, and with no clear chain of command.

The disruption has been real. At least five communications staffers have been pulled from the National Interagency Fire Center and reassigned elsewhere — a troubling move given

that effective communications during fire season can be a matter of life and death.

This consolidation was justified as an efficiency measure. But in response to a PEER Freedom of Information Act request, Interior said it had no documentation of any savings or eliminated duplication of job functions resulting from this effort. That is a great deal of disruption for no apparent benefit.

OFFSHORE WIND

Challenging Trump's War on Renewables Amid Fossil Fuel Crisis

PEEER has been providing legal analysis to interested parties and public commentary on the Trump administration's war on offshore wind.

President Trump's hatred for wind energy is no secret. Interior Secretary Doug Burgum is the point man to wage this war on wind. Initially, Burgum tried to cancel leases for offshore wind farms. That tactic did not work, as four different courts ruled against halting active construction on five offshore wind lease areas where construction had already begun.

So, Burgum came up with another tactic — buying out leases. This involved secret negotiations, leading to deals drawn up as legal settlements. So far, these deals have canceled eight offshore wind energy leases off both coasts (three affecting New York and New Jersey, two each affecting California and Maine, and one in the Carolinas). More than 20 additional U.S. offshore wind leases lack permits to construct a project and may be targets for similar buyout deals.

These buyouts are framed as settlements of purportedly imminent litigation under the Outer Continental Shelf Lands Act to unlock payments under the Judgment Act—the same act Trump is using as the basis for his outrageous \$1.776 billion (note the 1776 gimmick) “Anti-Weaponization Fund” for payouts to his political allies.

The Anti-Weaponization Fund was supposed to settle Trump's \$10 billion lawsuit against the IRS—Trump suing his own government. On offshore wind, however, there was no suit even filed, making



PHOTO: ADOBESTOCK ZASCHNAUS

Pay Not to Play. In the past three months, Interior Secretary Burgum has bought out offshore wind leases at a cost to taxpayers of more than \$1.8 billion, instructing developers to redirect these funds to U.S.-based oil and gas projects.

these buyouts especially dubious. Since there was no legal basis for litigation, there is no right to compensation. A coalition of northeastern states, led by New York, has filed suit to halt the first of these cancellations.

In addition to illegal machinations, these deals deprive the U.S. of clean renewable energy at a time when the price of oil is driving higher gasoline and other costs up due to Trump's ill-advised attack on Iran. This crisis is causing other countries to redouble efforts to reduce dependence on fossil fuels, while the U.S. goes the opposite direction.

Shining a Light on Massive Alaskan Land Give-Away

This May, Interior transferred 1.4 million acres of public land (an area larger than Delaware) to the state of Alaska. This giveaway is intended to facilitate several big developments, such as the Ambler Mining Road and a proposed liquefied natural gas pipeline.

This follows the February decision by Interior to rescind protections for more than two million acres of public land in Alaska on either side of the Trans-Alaska Pipeline System. State officials want to use these lands, which have

been in protected status since the 1970s, for energy and mining development. Together, they represent one of the biggest losses of federal lands in history and threaten some of the most ecologically significant landscapes in North America.

Lawsuits have been, or soon will be, filed against these moves. PEER is working with concerned public employees to ensure that the damning documents the government is trying to keep out of the official administrative record reach the public domain.



PHOTO: USFWS

Paradise About to be Lost. The 211-mile gravel Ambler Road would cut through large swaths of wilderness to connect the undeveloped mining district to the Dalton Highway.



PUBLIC LANDS

PEER Seeks Answers on Forest Service's "Emergency Designation"

This April, the U.S. Department of Agriculture issued an Emergency Situation Determination following an executive order aimed at expanding domestic timber production. The designation applies to more than 112 million acres of national forest lands, authorizing the U.S. Forest Service to carry out projects on an expedited basis, including fuel reduction and vegetation management activities.

To get answers, PEER has filed a series of Freedom of Information Act (FOIA) requests seeking records on how the Forest Service is implementing this sweeping "emergency" designation that now covers roughly 65% of all National Forest System lands — raising serious questions about whether federal agencies are using emergency powers to fast-track projects unrelated to any genuine emergency.

"Labeling more than half of our national forests as an 'emergency' raises a basic question: What isn't an emergency?" asked PEER Executive Director Tim Whitehouse. "These authorities are meant to be used sparingly and for specific threats — not as a blanket justification to fast-track logging and other projects across tens of millions of acres."



PHOTO: USFS

Get the Cut Out. Nearly two-thirds of all National Forest System lands are now under "emergency" declaration.

Under the Emergency Situation Determination, the Forest Service is permitted to accelerate project approvals that would otherwise be subject to more extensive environmental review and public input.

This move to shortcut environmental reviews is taking place as the Forest Service is shuttering two-thirds of its research stations and eliminating a significant number of forestry scientists. The cuts bring into question whether the agency now retains the expertise needed to conduct expedited reviews.

PEER's Work to Protect Trails and Public Spaces

The Bureau of Land Management (BLM) is advancing the Trump administration's energy dominance agenda by opening public lands to new oil and gas exploration. PEER is challenging some of these new drilling plans that interfere with the public's protected spaces.

In Utah, a recent oil and gas lease sale authorized leasing on three parcels (out of about 50) proximate to the Old Spanish National Historic Trail. PEER, The Coalition to Protect America's National Parks, Western Watersheds Project, and the Southern Utah

Wilderness Alliance used the administrative process to fight the leases by submitting comments and protesting the lease deficiencies. Nevertheless, BLM is moving ahead—so in May, PEER stepped in and filed a notice of intent to appeal and seek review before the Interior Board of Land Appeals.

BLM has two additional lease sales planned that impact the Trail. PEER has commented on and protested both and expects to file additional appeals on approximately 17 parcels.

Fighting EPA's Waiver of Air Pollution Standards

PEER, Earthjustice, the Center for Biological Diversity, and the Natural Resources Defense Council challenged the Trump administration's waiver of air pollution standards for Phoenix in federal court, one of the nation's smoggiest cities. Phoenix claimed that it could not meet Environmental

Protection Agency (EPA) standards due to international pollution.

Our petition claims that the administration illegally granted the waiver based on the alleged impacts from international emissions. While historically this waiver has been limited to cities on international borders, the

administration pointed to emissions as far away as Asia in giving Phoenix a free pass to pollute.

If EPA routinely grants these exemptions, it threatens to undermine efforts to reduce harmful ozone pollution nationwide. Read the petition at peer.org/ozone-waiver.

NATIONAL OCEANIC & ATMOSPHERIC ADMINISTRATION

Helping Fight Morally Reprehensible Decisions on the Rice's Whale

The first large whale species headed for extinction is found only in American waters. Rice's whales are the only baleen whale species that live exclusively in the Gulf of Mexico. Scientists believe there are only around 50 of these whales left in existence.

In recent months, the Trump administration has dealt this whale a double blow. First, the administration convened a rarely used committee of administration officials—dubbed the “God Squad”—to exempt the oil and gas industry from having to follow endangered species protections in the Gulf of Mexico due to the alleged need for more offshore drilling.

Now, the National Oceanic and Atmospheric Administration (NOAA) has questioned whether the critically endangered Rice's whales are in fact a distinct species. This matters because it directly determines their legal protections and vulnerability to extinction.

The National Marine Fisheries Service, an agency within NOAA, is attempting to delist the critically endangered Rice's whale by claiming, at the behest of the Trump administration, that the few remaining Rice's whales are actually not a separate species, but rather a subspecies of a more common whale, the Bryde's whale.

In fact, genetics establish that Rice's whales diverged from their nearest relative in the Bryde's complex somewhere between four and ten million years ago. Rice's whale is genetically distinct from its sister species, but protections under both the Endangered Species Act and the Marine Mammal Protection Act are not dependent on these whales being recognized as a separate species.



PHOTOS: NOAA

Condemned by the “God Squad.” The Trump administration has exempted oil and gas operations in the Gulf of Mexico from the Endangered Species Act and is taking steps that will kill off the last remaining Rice's whales.

The survival of the Rice's whale rests solely in the hands of the United States. As with other endangered species in this country, its survival depends on the ability of the public and the courts to stand firm against the administration's butchering of science and its lies and legal overreach.

Read PEER's comments at peer.org/rices-whale-letter or by scanning the QR code.



Tracking the Newest Marine Agency

In the wake of the BP Gulf oil spill, the Obama administration broke apart the former Mineral Management Service into three agencies: the Bureau of Ocean Energy Management (BOEM) to handle leasing, the Bureau of Safety and Environmental Enforcement (BSEE) to handle regulatory compliance, and the Office of Natural Resources Revenue to collect royalty revenue for the Treasury.

Now the Trump administration wants to recombine the BOEM and BSEE

into a new entity dubbed the Marine Minerals Administration. The new entity would be funded with both net discretionary appropriations and offsetting collections, including cost recovery and inspection fees.

Its mission would include not only overseeing offshore drilling but also mining minerals from the ocean floor. Meanwhile, under the so-called One Big Beautiful Bill Act, offshore drilling in both Alaskan and Gulf waters is slated to grow dramatically.

A key issue is whether the new entity is adequately funded for this bigger task. While the offshore regulators together once employed 1,500 full-time staffers under Biden, there are now only around 1,000 employees left, with proposed FY27 funding slated to further reduce staffing down to 874 people. Most experts say this shrunken, newly combined agency is no match for its greatly expanded portfolio.



ENVIRONMENTAL PROTECTION AGENCY

PEER Obtains Training Video on Push to Approve Toxic Chemicals

The Environmental Protection Agency (EPA)'s chemical review program has long been criticized as being too quick to approve dangerous chemicals for general use.

A video obtained by PEER under the Freedom of Information Act (FOIA) adds further evidence to support that suspicion. The training video shows a senior EPA scientist instructing 80 staff members to keep working a chemical risk assessment until they find a way to approve it, or in the senior scientist's words, to keep studying a chemical "until the answer is affirmative" and to stop "when it passes."

"This video explains how protections of the Toxic Substances Control Act (TSCA) are circumvented to benefit chemical companies," said PEER Science Policy

Director Kyla Bennett. "EPA conducts its reviews to ensure that every chemical passes — like a safety net in reverse."

TSCA was enacted in 1976 and strengthened in 2016 to protect Americans from harmful chemical exposure, but implementation has repeatedly favored industry. Industry introduces roughly 2,000 new chemicals annually, yet none have been blocked from commerce, and only a handful of existing chemicals have been restricted in any way.

With Trump back in office, the chemical industry has gained even more control over EPA.

PEER is proposing a number of reforms to the system—including greater transparency in how EPA makes decisions



PHOTO: ADOBESTOCK HECTOR PERTUZ

Stop When it Passes. EPA staff scientists are being counseled to short-circuit required scientific examinations of hazards posed by chemicals.

and a requirement that industry provide EPA with a minimum data set before the agency begins reviewing the safety of a chemical. Industry and the administration will bitterly oppose these simple reforms, but there is hope—across the country, momentum is building for reform at EPA.

EPA Scientific Output Plummets

The number of peer-reviewed studies published by EPA scientists has dramatically declined over the past year, according to figures released by PEER.

This reflects deep cuts to the agency's research capacity, including the disbanding of the Office of Research and Development and its replacement with a smaller office focused on short-term, statutorily required work. Hundreds of scientists have been

forced out of the agency or been reassigned, and long-term basic research, such as studies on the health effects of chemicals, has been sharply curtailed.

A new "Advanced Notification Policy" now requires pre-approval of significant publications to ensure alignment with "applicable agency policies," raising concerns that findings that conflict with the Trump administration's political goals will

be suppressed.

"EPA Administrator Lee Zeldin is working in lockstep with the Trump administration to crush independent science at EPA," said PEER Science Policy Director Kyla Bennett, who also warns that retreat from publishing will deter early career scientists from joining the agency, further eroding the ability of EPA to conduct independent scientific research.

PEER Defends Environmental Engineer in Microplastics Case

PEER is defending an EPA environmental engineer who was fired for bringing attention to the need to monitor microplastic pollution in the permit for the first aquaculture project in federal waters. His concern is that microplastics from plastic nets used to contain farm-raised fish

could harm the marine environment.

After he included a microplastics monitoring requirement in a draft permit, his superiors ordered that he remove it. He disagreed and, upon the advice of EPA's now-departed Scientific Integrity Officer,

he created a Differing Scientific Opinion, which was entered in the administrative record for the permit. In reaction, EPA placed him on administrative leave for months before removing him for "conduct unbecoming a federal official."

NONDISCLOSURE AGREEMENTS

PEER Calls on OPM to Withdraw Proposed Government-Wide NDA, Warning It Is Illegal, Deceptive, and a Threat to Democracy

PEER has submitted comments to the Office of Personnel Management (OPM) on the administration's proposed model Non-Disclosure Agreement (NDA) for federal employees. The NDAs would cover a broad range of information, including internal operations and pre-decisional material.

The agreement would be effective for five years after the signatory leaves federal service. Violations of the NDA could result in disciplinary action, including terminations or civil and criminal penalties for current and former federal employees.

In our comments, PEER outlines ten specific concerns with OPM's proposal, including:

- The NDA language is extraordinarily broad.
- Whistleblower protections are inadequate.
- It conflicts with existing laws and policies.
- It elevates politics and silences expertise.
- It can be weaponized against federal employees.

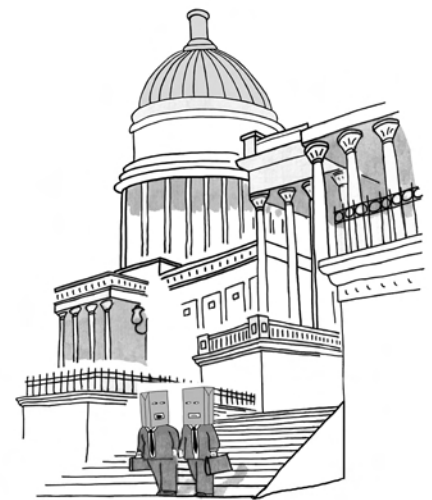
- It treats federal employees like private-sector employees.

OPM's proposal is so hopelessly vague that it would leave current and former federal workers guessing and in fear about what they can and cannot say — with the threat of being fired and with criminal prosecution or civil sanctions hanging over them if they say something about their work that the government in power perceives as threatening to its interests.

This threat will make current and former federal workers reluctant to respond to congressional inquiries, inspector general investigations, media questions, or requests from outside groups — all of which have historically served as checks on executive branch power.

In its comments, PEER also notes that OPM's proposal does not expressly include high-level political officials. This creates a dangerous asymmetry; the people most accountable to the public face no restrictions, while career employees who might contradict or correct the official record are silenced for five years after leaving government service.

When career employees are gagged while



"We can't even admit we work here."

PHOTO: CARTOONSTOCK

Vow of Silence. Federal workers would be forbidden from revealing "non-public information".

political appointees are allowed to speak freely, policy failures will go unchallenged, misconduct will go unreported, and government will be less likely to serve the public interest.

Read PEER's comments at peer.org/nda-comments.

Trump's "Voluntary" Loyalty Oaths Are Not So Voluntary

A year ago, the administration directed most federal civilian job applicants to write an essay on how they would "help advance the president's executive orders and policy priorities." PEER filed a complaint with the U.S. Office of Special Counsel (OSC), calling it illegal politicization of the civil service.

In response to PEER's complaint, OPM promised applicants would be told responses were optional, unscored, and

wouldn't be used as an ideological litmus test. Applicants who skipped the essay, OPM said, wouldn't be disqualified.

PEER is now refiling its complaint with OSC. Major unions are also challenging the loyalty oaths because the guidance is not being followed, and the questions have proven to be mandatory in practice despite being described as voluntary.



PEER PERSPECTIVES

Pump Fiction



Senate Parliamentarian Elizabeth MacDonough

U.S. Senate parliamentarian Elizabeth MacDonough has served under both Democratic and Republican majorities. In May, she ruled that a \$1 billion security funding appropriation for Trump's White House ballroom could not be added to a reconciliation package, which needs only a majority vote. Instead, she ruled that under Senate rules, it must go into legislation, which would require 60 votes and be susceptible to a filibuster, thus dooming the gambit. An enraged President Trump has demanded MacDonough be fired, writing, "Shockingly, Republicans have kept the very important position of 'Parliamentarian' in the hands of a woman, Elizabeth MacDonough, who was appointed, long ago, by Barack Hussein Obama and a vicious Lunatic known as Senator Harry Reid...." President Obama had nothing to do with MacDonough's appointment to this non-partisan legislative post, and neither should the current president.



Homeland Security Secretary Markwayne Mullin

Since 1916, the National Park Service's legal mandate has been to "conserve the scenery and the natural and historic objects and the wildlife therein ... in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." Secretary Mullin has wiped that out by signing an order waiving a long list of environmental laws and regulations so that a border barrier could be built through some of the most pristine and remote areas of Big Bend National Park, setting a precedent for similar action in other parks.



Senators Merkley and Murkowski

"It just seems like this is supreme stupidity and a violation of the fundamental distribution of powers in our Constitution," Sen. Jeff Merkley of Oregon told the AP of the administration's decision to cut the Ocean Observatories Initiative (OOI), a network of more than 900 ocean sensors that tracks ocean circulation, marine ecosystems, climate change, and extreme weather. OOI data is freely available to the public and informs more than 500 scientific publications. Senators Merkley and Lisa Murkowski spearheaded a senatorial letter to the National Science Foundation protesting the agency's dismantling of the network. After pushback from the Senate and the House, the Trump administration said it was backing off its plan—at least for now.



Georgia EPD Deputy Director Anna Truszczynski

For decades, the drinking water in Calhoun, Georgia has absorbed unsafe levels of PFAS from nearby carpet textile mills. Testing by the University of Georgia alerted the industry and state to this fact back in 2008. The Georgia Environmental Protection Division's (EPD) own testing confirmed these results, yet the agency took no action. EPD Deputy Director Anna Truszczynski explained: "We believe that there can be a good balance between environment and economy. We don't have to sacrifice one for the other." Scores of people in Calhoun who now suffer from cancers and other diseases quite understandably fail to see the balance.



Chemical Safety Board Members Steve Owens and Sylvia Johnson

President Trump has repeatedly sought to abolish the Chemical Safety Board (CSB), a small, independent agency whose mission is to investigate the cause of chemical spills, explosions, fires, and other industrial disasters to find ways to prevent their recurrence. The two remaining members of the 5-member board openly oppose an attempt to roll back rules to prevent accidents at thousands of industrial facilities, writing that the current repeal plan is "a significant step backwards." They're urging the Environmental Protection Agency to retain mandatory audits at plants with prior accidents and the "stop work" provision empowering workers to halt unsafe operations. In today's world, disagreements, no matter how principled, require casting a profile in courage. Let's hope Congress continues to fund the CSB.



Wayne Arguin, Head of the U.S. Delegation to the U.N. IMO

Arguin is the point person in the Trump administration's drive against a global carbon tax on shipping, called The Net Zero Framework, in which a carbon-intensity standard would become stricter over time. Ships that fail to meet the standard would pay a fee to help fund the transition to greener fuels and support developing countries' carbon reduction efforts. He circulated flyers at the latest International Maritime Organization (IMO) meeting containing what experts said was a demonstrably false economic analysis exaggerating the Framework's costs to certain countries. Disinformation is quickly becoming America's leading export.



SCIENCE

Political Review Threatens Science Grants

PEER has submitted comments on a Trump administration proposal to subject federal grants to political review at almost any time during the grant process. This politicization of grants would corrupt the peer-review process that has made American science the envy of the world. It also poses serious threats to democratic governance and institutional integrity and jeopardizes America's leadership in scientific research.

Perhaps most dangerously, it establishes a dangerous precedent: that government resources should reward political conformity rather than basic science. That's a hallmark of authoritarian governance, not democracy. Climate science, public health research, and vaccine research have already become casualties of ideological gatekeeping rather than merit-based evaluation. We are helping to give a voice to public employees fighting this corruption of science.

DEVELOPMENT

On the Right Side of History — Supporting PEER



As we approach the midterm elections, we are grateful for your support. It has fueled our efforts to fight one of the most corrupt administrations in this nation's history.

That means everything to us.

We are on the right side of history—the Gilded Age produced the Progressives, Watergate produced landmark reforms, and this era's corruption will generate a new coalition to fix the mess we are in.

We are helping to build a better future and will be an integral part of the work ahead.

We need your help to keep us going in the coming year. This summer, thanks to a generous supporter, our **Double Trouble** campaign will match every donation up to \$70,000. Please consider giving by using the enclosed envelope, visiting peer.org/donate, or scanning the QR code—and bring a friend along.

With gratitude,
The PEER Team



Learn more about the campaign in videos from PEER General Counsel Joanna Citron Day and our clients at peer.org/dt26. Scan the QR code to donate.



SCAN TO DONATE

We Thank You!

*We want to take a moment to thank the **722 individual donors** who have made a donation to PEER this fiscal year. Your commitment to our mission allows us to continue our essential work.*

Thank you to the following foundations for their support:

Cedar Tree Foundation, Curtis & Edith Munson Foundation, Park Foundation, Winslow Foundation



Public Employees for Environmental Responsibility

962 Wayne Ave, Suite 610
Silver Spring, MD 20910

Return Service Requested

*Help the Environment Even More!
...Go paperless with PEEReview
by selecting this preference on the
envelope enclosed*

Printed on Recycled Paper

The Park Service Is a Stress Test for Democracy (continued from page 1)

beautification projects. That figure is more than three times the Park Service's entire budget. NPS has already lost more than 24 percent of its permanent workforce since January 2025.

Creating a Partisan Slush Fund

As part of America's 250th anniversary, rather than work through Congress's official, nonpartisan America250 commission, Trump directed Interior Secretary Burgum to work with a private entity—Freedom 250. That entity has reportedly redirected \$100 million destined for America250 and is co-mingling private and public funds, seeking foreign donations, and selling access to Trump for up to \$2.5 million.

The Guardrails Must Hold

What is unfolding at NPS is not just mismanagement; it is a stress test for democracy.



LOGO: DOT



PHOTO: NPS

Reflections of Waste. While millions were steered toward a controversial no-bid contract for the Lincoln Memorial Reflecting Pool, the National Park Service continues to face staffing shortages, deferred maintenance, and shrinking budgets at parks across the country.

The Constitution vests Congress with the power of the purse for a reason. No president should be able to redirect public funds to personal vanity projects, sideline competitive bidding, or weaponize a beloved federal agency for partisan ends.

Cabinet secretaries also take an oath to uphold the law — not to serve as instruments of executive excess. Secretary Burgum has the authority and

the obligation to say no but never does. Moving forward, Congress must assert its oversight role, demand full transparency, and make clear that agency heads who abandon their legal duties will be held accountable.

Our public lands, our institutions, and our Constitution deserve nothing less. See page 4 for more on what is happening inside NPS.