



PEERreview

A Publication of Public Employees for Environmental Responsibility

The Space Race Is Leaving the Environment Behind

Rocket launches, orbital data centers, and satellites beaming sunlight back to Earth escape meaningful review

Look up on a clear night, and the sky is already changing. In 2015, about 1,400 active satellites circled the planet. As of 2026, there are 15,000, and that number is projected to grow by an additional 58,000 by 2030. Pending proposals would go far beyond that, adding satellites by the hundreds of thousands. Yet the federal agencies that approve these projects are moving to exempt them from any environmental review for their effects on the United States. The consequences will be significant, not only in the sky but also down here on Earth.

PEER is working with a coalition of groups on a three-part campaign: (1) to secure environmental reviews of U.S. space activities, (2) to educate the public on how far-reaching these effects are, and (3) to lay the groundwork for greater public oversight of an industry that is growing much faster than the rules that govern it.

Waiving the Rules for Rockets

Launches and reentries are busier than ever. In fiscal year 2025, the Federal Aviation Administration (FAA) authorized over 200 commercial space operations—the highest annual total in US history—and it expects that number to climb steeply. In July, the FAA proposed a rule that would make selected requirements from 13 federal laws inapplicable to covered commercial space launches and reentries, launch and reentry sites, and experimental permits. The FAA claims these laws are slowing innovation.

PEER, DarkSky International, and the American Bird Conservancy—represented by Earthjustice—filed comments opposing the waiver. We noted that commercial space activities are known to have numerous environmental impacts, including emissions from rocket launches, falling debris, and light and noise pollution that would disrupt and harm wildlife. We are in a 21st-century gold rush to extract profits from space that is being propelled by money, rapid innovations, and a government-wide deregulatory agenda.

A Million Data Centers in Orbit

Tech companies now want to move artificial intelligence computing into space. At least four companies, SpaceX, Starcloud, Blue Origin, and Cowboy Space Corporation, have applied to the Federal Communications Commission (FCC) this year to deploy satellite constellations described as "orbital data centers." SpaceX's proposal alone seeks permission to launch



PHOTO: DARKSKY INTERNATIONAL

Sunlight at Night. Reflect Orbital satellites would illuminate areas up to five kilometers wide at intensities several times brighter than a full moon. The image shown is a representation of the concept and not a real photograph.

up to a million space-based data centers. PEER and its allies have filed comments on the SpaceX application and, separately, objected to the FCC's approval of over fifty thousand Blue Origin orbital data center satellites.

In July, PEER, DarkSky International, and Environment America petitioned the FCC for a comprehensive review of the environmental risks, impacts, and costs of satellite-based data centers in the United States, asking it to pause licensing until it conducts a programmatic environmental review. The FCC has historically authorized satellites without any environmental review and has never considered cumulative impacts. The groups want a public discussion of reflected light in the night sky, pollution from launches, and the effects of burned-up satellites reentering Earth's atmosphere.

Turning Night Into Day

The most startling proposal comes from Reflect Orbital, which wants to sell sunlight at night. Its Earendil-1



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PEERreview is the quarterly newsletter of Public Employees for Environmental Responsibility

FROM THE EXECUTIVE DIRECTOR

Dear Friends:

We couldn't be more excited about some of the changes happening at PEER to help us meet the moment we are in. Over the past year, four new staff members and two new board members have joined the PEER team. Together they bring what this moment demands: a deep understanding of how government works and strong connections to the natural world around us.

You may have read about these changes elsewhere, but it is worth introducing them together here as we head into a new Congress and a deepening political and environmental crisis.

Aaron Lloyd joined as Senior Counsel after more than two decades in whistleblower protection and labor law, most recently at the Council of Inspectors General, where his roles included Acting General Counsel. Few people better understand how to shield truth-tellers from retaliation.

New Senior Counsel Tony Irish spent 21 years at the Department of the Interior, most recently as Associate Solicitor for General Law. He brings deep expertise in the Freedom of Information Act, the Federal Records Act, appropriations law, congressional oversight, and public lands law.

Recently, Isabelle Dietz joined PEER as Staff Counsel and Ben Glick as our new Litigation Assistant. Read more about Isabelle and Ben on page 3.

On our board, Michele Boyd brings more than 20 years of experience across government, nonprofits, and industry, including leadership at the Department of Energy's Solar Energy Technologies Office. She now focuses on nonprofit management and issues of democracy and the environment.

Jacob Malcom comes to our board as a former senior executive in the Interior Secretary's office, a vice president and policy analyst at a conservation nonprofit, and a field biologist with the U.S. Fish and Wildlife Service. He knows firsthand what dedicated civil servants give and what is lost when they are driven out.

Each of them chose to join PEER. That gives us hope. The people who protect our environment are still here, still organized, and still fighting. With colleagues like these, our voice will be stronger than ever. Please join us in welcoming them.

Tim Whitehouse

Executive Director

P.S. We are keeping an eye on the midterm elections and how they might affect our work. We will keep you updated on our next steps.

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.

HELLOS AND GOODBYES

Former DOJ Trial Attorney Joins PEER

PEER is pleased to welcome Isabelle Dietz as Staff Counsel. Previously, Isabelle worked in the Department of Justice's Tax Division, where she served as a trial attorney representing the United States in civil tax litigation in federal district and bankruptcy courts. In 2024, the Tax Division honored her with an Outstanding Attorney Award.

Isabelle clerked for the Honorable William K. Sessions III of the U.S. District Court for the District of Vermont and the Honorable Stephen A. Higginson of the U.S. Court of Appeals for the Fifth Circuit. She earned her J.D. from Stanford Law School, where she

received the school's highest pro bono distinction, and her B.A. from Middlebury College.

"I am excited to join PEER and put my litigation experience to work defending public employees and protecting the environment," said Isabelle.

"Isabelle brings litigation experience and a demonstrated commitment to public service at a time when those skills are needed more than ever to protect public employees and the environment," said Joanna Citron Day, PEER's general counsel.



Isabelle Dietz joins PEER as our newest Staff Counsel.

Ben Glick Joins PEER as Litigation Assistant

We are excited to welcome Ben Glick as PEER's new Litigation Assistant. Ben is a recent graduate of the University of Michigan, where he earned his B.A. in Environment and specialized in environmental law and policy.

Ben grew up in Michigan, and his passion for conservation began on the shores and in the waters of the Great Lakes. In college, he interned with the Sierra Club and the Office of the New York State Attorney General, gaining early experience in both environmental advocacy and public interest law.



Ben Glick brings a range of experience in environmental advocacy and public interest law to his role at PEER.

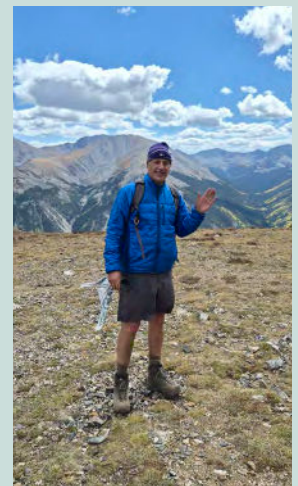
At PEER, Ben supports our legal team as it defends public employees and holds agencies accountable. He has already contributed to PEER's commentary, including a piece asking why federal judges are not bound by the same ethics code as executive branch employees.

"Public employees are on the front lines of protecting our air, water, and public lands, and right now they need more support than ever. I'm proud to be part of a team that stands with them," said Ben.

Peter Jenkins Retires, But Stays in the Fight

After years of service as PEER's Senior Counsel, Peter Jenkins has retired. We're glad to say he hasn't gone far. When not out hiking, Peter remains with PEER as a consultant, helping in our challenge to the illegal elimination of Environmental Protection Agency environmental justice employee positions.

An environmental attorney since 1983, Peter has worked at the Center for Food Safety, Defenders of Wildlife, Conservation International, and Congress's Office of Technology Assessment. At PEER, he brought the law to bear on protecting wildlife, public health, and the public servants who defend them.



Retired Senior Counsel Peter Jenkins enjoys hiking on Hope Pass in the Collegiate Range of Colorado.

So many people are grateful for all that Peter has done for them over the years. Thank you, Peter!



PUBLIC LANDS

Department of the Interior Must Do Better

Once again, the Department of the Interior appears poised for another major reorganization, with employees in the dark. Draft documents obtained by reporters suggest a broad reshuffling of the National Park Service and other bureaus within Interior.

Problem Creating, Not Solving

Reorganizations should begin with a clearly identified problem, evidence that the proposed solution will address these problems, and meaningful input from those who do the work. So far, Interior has done none of this.

In April 2025, Doug Burgum consolidated thousands of administrative, IT, and communications employees under the Office of the Secretary, promising efficiencies and accountability. A year later, Interior told PEER it could locate no records documenting the promised cost savings or the costs to individual bureaus.

This January, Interior established the U.S. Wildland Fire Service, moving operations previously carried out across the land management agencies within Burgum's office. July saw the creation of the Marine Minerals Administration, unwinding reforms made in the aftermath of the 2010 Deepwater Horizon oil spill that killed 11 and decimated the waters and coasts of the Gulf of Mexico.

Amid staffing reductions and disruption, Secretary Burgum appears ready to reorganize again without fully implementing those already underway or explaining why this reorganization is needed. Parks are already struggling with funding, workforce

issues, and a chaotic chain of command. Another poorly planned reorganization could make things worse.

A Troubling Pattern

Interior is not alone. The Forest Service, part of the U.S. Department of Agriculture, is also planning to move its headquarters from Washington to Salt Lake City, with or without congressional approval. Some 6,500 employees were told their jobs would be affected, but not how.

Every disruption carries costs. When the first Trump administration moved the Bureau of Land Management's headquarters to Grand Junction in 2019, few affected employees relocated.

Ensuring Oversight

If Interior reorganizes while cutting career staff and weighing consequential new uses of public lands, then Congress, the employees, and the public must be allowed to give input.

Large structural changes to government agencies should not be designed behind closed doors. In the coming months, we will be working with current and former employees and members of Congress to ensure there is more oversight of the Department of the Interior.

The stakes are too high for another reorganization built on secrecy, disruption, and vague promises of future efficiency.

Protecting Big Bend National Park



"Big Bend National Park is one of the last remaining really wild places in the Lower 48, a national gem. Border security is important — and already working there without the need for massive and destructive new infrastructure." —Bob Krumenaker, Chair of Keep Big Bend Wild and retired NPS superintendent of Big Bend National Park

PEER has asked the Department of Homeland Security Inspector General to investigate billions of dollars in federal contracts for border infrastructure in Texas's Big Bend National Park, citing concerns about political favoritism, wasted taxpayer money, and irreversible harm to one of the nation's most unique landscapes.

The Big Bend region sees the lowest levels of unauthorized crossings on the southern border and is one of the most remote and unique

national parks in the country.

Yet contractors closely aligned with President Trump and the Republican Party have received billions of dollars to work inside and around Big Bend National Park.

PEER wants to know how contractors were selected, what role political connections played, how the projects were deemed necessary, and why environmental and oversight requirements were waived.

AROUND THE COUNTRY

Safety Zones Needed to Protect Whales

The recovery of Pacific gray whales is at risk from accelerating deaths due to ship strikes, reduced food sources, and other threats, according to stranding figures PEER obtained from the National Oceanic and Atmospheric Administration (NOAA).

As of July 6, 145 gray whale stranding deaths had been reported this year. That exceeds the annual totals from the last three years of the 2019–2023 "Unusual Mortality Event."

Gray whales migrate each year between winter calving lagoons off Baja California and Arctic feeding grounds. The route crosses the paths of increasingly large and fast commercial ships. These stranding numbers are only the tip of the iceberg, since most carcasses sink before washing ashore.

"The gray whale appears to be suffering its second Catastrophic Mortality Event this decade," said Rick Steiner, an Alaska marine ecologist and Chair of PEER's Board of Directors. "Gray whales seem to be starving, as Arctic sea ice decline is reducing their Arctic seabed prey resource."

In 2023, PEER and The Ocean Foundation proposed Whale Safety Zones in U.S. waters to prevent ship strikes. In August 2025,



PHOTO: NOAA

Nearly 700 Beach Strandings. In 2019, the gray whale population estimate was 20,500; NOAA's 2025 gray whale population estimate was 13,000 whales, the lowest since the 1970s.

Professor Steiner petitioned NOAA to relist the gray whale under the Endangered Species Act. NOAA has yet to act on either petition. Continued inaction could push the Pacific population toward extinction. PEER and allied groups are preparing their next steps.

A Look at Florida's Water Quality Struggles

A new report by PEER and Waterkeepers Florida shows that most of Florida's waterways fail to meet state water quality standards, while enforcement of environmental laws remains weak. Fecal bacteria and nutrient pollution are the most widespread contaminants in the state's rivers, lakes, and estuaries, driven by agricultural runoff, wastewater discharges, and excess fertilizer.

The report calls for three things: stronger enforcement of existing laws, more protective pollution-control policies, and greater transparency from state and local governments.

PEER and Waterkeepers Florida believe these steps are essential to protect public health, wildlife, and Florida's multi-billion-dollar tourism economy. Read our latest report here: peer.org/florida-report

Aging Trans-Alaska Pipeline Renewal Needs a Real Review

The Trump administration recently initiated an environmental review for renewing the right-of-way for another 30 years of the massive Trans-Alaska Pipeline System (TAPS), allowing public comment for only 15 days.

PEER teamed up with the Center for Biological Diversity, Fairbanks Climate Action Coalition, Pacific Environment, Sierra Club, and Sovereign Inupiat for a Living Arctic to get a small extension on the comment period and to submit comments on the environmental review.

The TAPS carries oil from Prudhoe Bay to Port Valdez. Congress authorized the Bureau of Land

Management (BLM) to grant its first 30-year right-of-way to the pipeline in 1974. A second was granted in 2004 and expires in 2034. The Trump administration now wants a quick, early renewal to sidestep consideration of growing economic and ecological concerns about the pipeline.

After PEER filed a Freedom of Information Act request several years ago with BLM about the climate impacts of the pipeline, BLM said it could not identify a single planning document on reducing the climate-related impacts of TAPS. Nor was it "aware of any assessments concerning climate change" related to maintenance costs or spill risks.



ENVIRONMENTAL PROTECTION AGENCY

Eyes on Environmental Enforcement: A Bold New PEER-led Initiative

In early October, PEER and its partners launched the "Eyes on Environmental Enforcement Project," an online portal that exposes previously hard-to-obtain inspection and notice-of-violation reports from the Environmental Protection Agency (EPA) under the Clean Air Act, the Clean Water Act, and the Resource Conservation and Recovery Act, or RCRA, a law that gives EPA the authority to control hazardous waste from its generation to its disposal.

In initiating this project, PEER has three overarching goals: (1) highlight the importance of environmental enforcement, (2) give the public easy access to important government documents, and (3) create a new paradigm for how EPA should manage enforcement information that the public has a right to see.

The portal, available at www.eyesonenforcement.org, brings together inspection reports, notices of violation, and related documents obtained by PEER from the EPA through the federal Freedom of Information Act. The website:

- Makes enforcement records about inspections and violations searchable in one place.
- Helps communities near polluting facilities understand each facility's local enforcement history.
- Supports journalists and researchers investigating oversight and enforcement trends.
- Sets a standard for data management and transparency that EPA should adhere to in the future.



PHOTO: THANANIT

Read PEER's January 2026 report on the collapse of environmental enforcement under Trump's EPA: peer.org/enforcement-report

- Can help support citizen suits.

"This work is an important part of a larger effort to hold EPA accountable to the public," said Tim Whitehouse, PEER's executive director, "and is an important part of the fight to ensure that environmental laws are enforced." In January 2026, PEER issued a report that documented the collapse of environmental enforcement at the Department of Justice and the EPA.

The data in the portal covers the years 2021 to 2025 and will be updated on a regular basis. The Eyes on Environmental Enforcement Project team is working on exciting future additions to this site.

Background on Eyes on Enforcement

In early 2026, PEER brought two national experts on EPA enforcement and compliance data into the project to organize the data and website. Eric Schaeffer, former director of EPA's Office of Regulatory Enforcement, has been instrumental in curating the files. Mike Barrette, founder and former manager of EPA's Enforcement and Compliance History Online and EPA's National Targeting Center, is taking a lead role in pulling together the technical staff to make this initiative happen.

Mike and Eric have worked with PEER staff, including Colleen Zimmerman and Kaylee Rodriguez, and with Ngan Nguyen, a data scientist. The Environmental Data and Governance

Initiative provided PEER with strategic advice and consultation on building out the database. PEER also received significant technical contributions in developing the system from Merlin Chowkwanyun, an associate professor at Columbia University.

"We hope to work with a new Congress to push EPA into the 21st century on data management," said Zimmerman, PEER's staff counsel, who notes that one of EPA's ten regions already puts almost all the information sought by PEER on its website. "That region should serve as a model for the rest of EPA in making enforcement information available to the public on its website."

ENVIRONMENTAL PROTECTION AGENCY

PEER Challenges EPA Secrets on AI

PEER and the Free Information Group (FIG) are appealing the U.S. Environmental Protection Agency's (EPA) refusal to release its Final Impact Assessments for high-impact artificial intelligence (AI) tools deployed by the agency, after EPA declined to make these and other documents related to its use of AI available as part of a Freedom of Information Act (FOIA) request.

On March 5, 2026, PEER and FIG filed a FOIA request seeking a suite of records relating to EPA's chemical assessments and the use of AI, including the AI screening tools used for seven chemicals. In its response, EPA stated that it found only two types of records responsive to this expansive FOIA request: its 2025 AI Use Case Inventory and its "Final Impact Assessments for high-impact EPA AI tools," which it withheld as part of a deliberative process privilege.

PEER is increasingly scrutinizing how AI is being used at EPA and other agencies and calling for greater accountability and transparency in the federal government, especially as scientists continue to be pushed out the door.



"Shouldn't we hold off on artificial intelligence until we figure out actual intelligence?"

PHOTO: CARTOONSTOCK

EPA 9/11 Whistleblower Vindicated

On the 25th anniversary of the Sept. 11 attacks on the World Trade Center, New York City Mayor Zohran Mamdani released some 170,000 pages of documents concerning the air quality around the site in the months following the buildings' collapse. These documents corroborated the disclosures by Dr. Cate Jenkins, a senior EPA chemist, who publicly charged that, contrary to EPA assurances at the time of this disaster, the air was unsafe to breathe.

PEER successfully defended Dr. Jenkins from an array of retaliatory actions. In May 2012, the Merit Systems Protection Board unanimously vacated Dr. Jenkins' termination and ordered that she be fully restored and given back pay with interest.

While we succeeded in restoring Dr. Jenkins, PEER was unable to convince a federal court that EPA had a duty to tighten its corrosivity standard that is ten times less stringent than safe levels set by the United Nations, the European Union, and Canada, subjecting people to serious harm.

EPA never admitted fault over its 9/11 conduct, and thousands of workers and residents suffered as a result. Unfortunately, today's EPA is again actively deceiving the public about the consequences of increased pollutants now being officially allowed into our air.

EPA Hypes Meaningless Step on Microplastics

EPA recently added microplastics to the official "Contaminant Candidate List" under the Safe Drinking Water Act, calling it a historic action. A PEER analysis reveals, however, that none of the more than 200 chemicals EPA placed on the list since 1998 are currently regulated.

"Even a cursory examination reveals that EPA's action on microplastics is an empty gesture. EPA's Contaminant Candidate List is a regulatory road

to nowhere," stated PEER Science Policy Director Kyla Bennett, a scientist and attorney formerly with EPA. "Unfortunately, microplastics are yet another public health challenge where EPA's actions are meaningless."

A further indication of the vapid nature of EPA's microplastics stance is declining to require public water systems across the country to monitor microplastics in drinking water.



Toxic Dietary Supplement. PEER is representing an EPA whistleblower fired for recommending microplastics monitoring in the first federal aquaculture facility.



FOREST SERVICE

PEER Sues the U.S. Forest Service to Release Non-Disclosure Agreements

PEER recently filed a federal lawsuit against the U.S. Forest Service in the U.S. District Court for the District of Columbia to compel the release of non-disclosure agreements (NDAs) the agency has required employees to sign. The suit was filed under the Freedom of Information Act after the Forest Service failed to meet its statutory deadline to respond to PEER's records request and continued to withhold the documents.

The Forest Service has a troubling track record on NDAs. In October 2024, the U.S. Department of Agriculture Office of Inspector General found that Forest Service NDA policies and forms lacked the legally required anti-gag provisions under the Whistleblower Protection Enhancement Act. The agency agreed to fix the problem and reissue compliant NDAs by October 2025. Whether it followed through remains unknown — because the agency won't release the records.

The lawsuit takes on broader significance given the Trump administration's May

2026 proposal to build a model government-wide NDA that could cover most federal employees. PEER has called on the Office of Personnel Management to withdraw the proposal, arguing it is illegal and designed to silence career civil servants. In our comments, we noted that the proposal was vague enough to frighten employees into silence, broad enough to cover almost any internal government discussion, and structured to ensure that the people who sign it have almost nowhere to turn if they witness wrongdoing.

We are concerned that the growing use of NDAs in the federal government will make federal workers live in fear of being fired, prosecuted, or sanctioned for saying anything about government operations that the administration dislikes. This is troubling — public servants are not corporate employees protecting trade secrets. Their work is funded by taxpayers, and much of it belongs in the public domain.

PEER is asking the court to order the immediate release of all responsive records.

The public deserves to know what federal employees are being asked to sign — and whether those agreements comply with the law.



“Normalizing NDAs across the government doesn’t just silence public servants; it risks turning the machinery of government into a black box accountable to no one except those in power. That is not how democracy is supposed to function.”

– PEER General Counsel Joanna Citron Day

Industrial Accidents Rise as Safety Measures Retreat

The number of U.S. industrial chemical accidents, explosions, and fires is rising, according to statistics being gathered as a result of a reporting system created by a previous PEER lawsuit. Industrial chemical releases have grown by more than half since 2021, while accidents involving injuries or fatalities are up 20% in just the past year.

“Like our public infrastructure, America’s industrial infrastructure is aging, making disastrous failures increasingly likely,” commented PEER Executive Director Tim Whitehouse, noting that most U.S.

refineries were built before 1985. “Serious chemical accidents are becoming an almost daily occurrence.”

Recent emergencies include a ruptured chemical tank in Garden Grove, CA, causing 40,000 residents to evacuate, and the chemical plant explosion in Longview, WA, which killed 11 workers. Yet, the Trump administration wants to reverse recently adopted safety requirements, including a third-party post-accident audit, use of safer technologies, and other worker-safety measures. Trump also wants to zero out the entire \$14 million budget for

the Chemical Safety Board (CSB), the only agency charged with investigating the cause of these accidents.

“Penny-for-penny, the Chemical Safety Board is one of the most cost-effective agencies in government,” added Whitehouse, pointing out that CSB safety recommendations have an almost 90% industry adoption rate. Scan the QR Code to read more about the rise of industrial accidents in recent years.



U.S. FOREST SERVICE

Administration Proposes to Repeal “Roadless Rule” in Forests

One environmentally destructive move of the second Trump administration is its proposed repeal of the Roadless Rule. Since its adoption in 2001, the Roadless Rule has served as a cornerstone of Western public lands conservation. Protecting vast areas from penetration by logging roads has been key to safeguarding clean drinking water sources, critical wildlife habitat, carbon storage, and world-class recreation opportunities.

Claims that the Roadless Rule impedes wildfire management are utterly specious. The Rule explicitly allows for wildfire prevention, suppression, and hazardous fuels reduction. In fact, nearly 2 million acres of roadless lands have undergone fuel treatments in recent years. Further, by limiting road construction, the Roadless Rule reduces ignition risks from vehicles, campfires, and other human activities, which is why wildfire ignitions occur far more frequently in roaded areas.

In addition, the economic benefits of the Roadless Rule are substantial. By avoiding construction and maintenance of new roads, the Rule saves taxpayers millions. The already budget-strapped Forest Service is laboring under a \$6 billion road maintenance backlog.

The Roadless Rule was adopted after one of the most robust public processes in rulemaking history. The Forest Service received 1.6 million comments (95% in support) and held over 600 public meetings. Yet the Trump Forest Service seeks to ram rescission through without any public

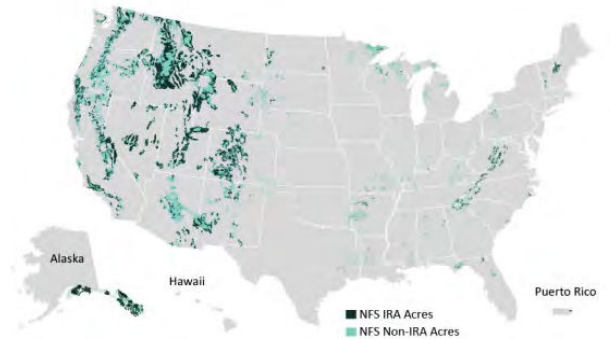


PHOTO: CONGRESS.GOV

Key Habitat Protection. The Roadless Rule shields 44 million acres (an area the size of Missouri) of National Forest System lands across 37 states.

hearings. Even with a truncated public comment period, more than 600,000 comments have been submitted, with over 99% opposing this rollback.

PEER is part of a broad conservation coalition that will be opposing this backdoor effort to open more forests up for logging.

Are More Motorized Vehicles Coming to National Forests?

In addition to repealing the Roadless Rule to open more roads and trails through national forest lands, the Trump administration also wants to increase motorized traffic on existing and new roads and trails. It has proposed to rewrite the travel management regulations governing where motor vehicles may go across the 193-million-acre National Forest System.

Currently, forest managers must apply “minimization criteria” to 1) limit damage to soil, water, vegetation, and wildlife habitat; 2) reduce user conflicts; and 3) identify the minimum road system the agency needs and can afford to maintain. Nearly every national forest (148 of 154) and all 20 national grasslands have completed their maps.

Trump wants to eliminate the minimization criteria altogether. Instead, the administration proposes to reverse the decades-old presumption that routes are closed unless specifically open and replace it with a new rule that routes are presumed open unless mapped as closed. The U.S. Department of

Agriculture, the Forest Service’s parent agency, calls it “a uniform national policy favoring increased access.”

“The Forest Service proposal to open more trails to motorized traffic while eliminating the employees needed to evaluate, maintain, monitor, and enforce against abuse is a recipe for environmental destruction and physical danger in our forests,” said Chandra Rosenthal, PEER’s western lands and Rocky Mountain advocate. Forest fragmentation from roads is cumulative and difficult to undo.

In opposing this plan, PEER has teamed up with an old ally, Forest Service Employees for Environmental Ethics, the organization that helped birth PEER more than 33 years ago. The groups support parts of the proposal, including GIS-compatible digital maps, simpler clerical map corrections, and objective criteria for mobility devices used by people with disabilities.



PEER PERSPECTIVES

Heros and Hazmats



Commerce Secretary Howard Lutnick

As the Census Bureau prepares for the 2030 census, it has become enmeshed in Trump election conspiracy claims. In August, it released a shady report by political appointees decrying voting by non-U.S. citizens, drawing protests from data experts about political interference in the government's largest statistical agency. A day later, the Commerce Department, which also oversees NOAA and the Bureau of Economic Analysis, quietly altered its Scientific Integrity Policy to remove the prohibition against "inappropriate influence" in its data collection, statistical analysis, and technical reports. Under Sec. Lutnick, removing guardrails against political interference is a first step in weaponizing Commerce's data products. We shudder at what the next step might be.



Appellate Court Judge Patricia Millett

In a D.C. Circuit hearing on Trump's unilateral effort to build a White House ballroom, Judge Millett cut to the chase. She grilled the Justice Department attorney about the administration's claimed power to "move fast and break things" without legal challenge. She then asked, "If the government decides, very quickly, to bulldoze the Statue of Liberty—the people whose ancestors that was the first thing they saw coming to this country, but the government moved too fast— nothing can be done?" The Justice attorney's response was, "I think that's right, yes." The notion that courts cannot halt even a clearly illegal project rests on the circular argument that only Congress can stop the President, though Congress has already forbidden it. Positing impeachment as the only remedy for a rogue president is a high-risk gambit with an unintended prophetic quality.



Florida Governor Ron DeSantis

Since July 2025, Florida's infamous Everglades facility known as Alligator Alcatraz has processed and deported 22,000 detainees. The DHS Inspector General found detainees held in outdoor cages less than half the size of the smallest spaces allowed at immigration detention facilities, under conditions that did "not align with standards for humane treatment." Gov. DeSantis said the facility was meant to be temporary: "At some point, we will, of course, break it down. That was always the goal." Good to know that while it resembled hell on earth, it was only intended to be a penal purgatory.



U.S. Representatives Chellie Pingree and Thomas Massie

This past June, the Supreme Court struck down a Missouri failure-to-warn verdict against Monsanto over non-Hodgkin's lymphoma, ruling that federal pesticide law preempted claims about Roundup's missing cancer warning. Reps. Chellie Pingree (D-Maine) and Thomas Massie (R-Ky.) responded with the People Over Poison Act, allowing people who blame pesticides for their illnesses to sue manufacturers in state courts if labels didn't warn them of the risks. "Federal pesticide law was never supposed to be a liability waiver for corporations, and not a permission slip to hide behind insufficient labels while people get sick," Rep. Pingree said in a news release. While it may not go far this session, this bipartisan initiative may find traction in the next.



U.S. Representative Bruce Westerman

Westerman (R-Ark.), chair of the House Natural Resources Committee, along with 15 GOP colleagues, has "launched an investigation into nineteen radical environmental groups' unscrupulous tactics to profit from taxpayer dollars [from building] powerful and profitable litigation machines funded by taxpayer dollars through the exploitation of statutory fee-shifting provisions." Targets include Great Old Broads for Wilderness, Sierra Club, and Wilderness Watch, mostly PEER allies and frequent co-plaintiffs. What Westerman and his legislative posse overlook is that to collect fees, these groups must first prevail in court—that is, show the agency is violating the law. Thus, the most effective way to defund these non-profit "litigation machines" is for federal agencies to start obeying the law.



Former Kenya Chief Justice David Maraga

Kenya's former Chief Justice David Maraga was arrested during a sit-in with hundreds of activists outside Nairobi National Park's main gate while heading to present a petition to the Kenya Wildlife Service protesting planned construction inside the park. The Service claimed the project would improve visitor experience and denied land-grabbing claims. Upon his release, Mr. Maraga stated, "Our national heritage and environment must be safeguarded from greed and unnecessary destruction without public participation." It's comforting to know that national park land could not be given away without public participation in this country.

PLANNING FOR THE COMING YEARS

Facing a Constitutional, Legal, and Moral Crisis

In a new email series, *How We Fight Back*, we identify some of the systemic issues that are driving the attacks on a merit-based civil service and the environment and how we are fighting back to protect what we believe should be protected. We talked about the constitutional crisis facing this country and our work in agencies such as the U.S. Forest Service, the National Park Service, and the Environmental Protection Agency (EPA).

In this new series, we don't mince words. We describe a sweeping pattern of abuse by this administration and how our response

rests on seven broad themes--from sticking to our mission, to using the courts, Congress, and public opinion to defend our public lands, to making corruption costly for this administration.

We want to thank those who have shared their ideas in response to this ongoing series. Please continue to share your feedback with us, especially as we move into a new Congress and new opportunities for rebuilding. We look forward to our continued discussions together. To view this series, please visit our website here: peer.org/how-we-fight-back

DEVELOPMENT

Preparing For the Future as We Approach the Midyears

In this edition of PEERreview, you have seen some of PEER's extraordinary work across a wide range of issues and topic areas. It is an important part of the web of action that has formed to help make a difference in the world around us.

This web involves current and former public employees who bring the technical and insider knowledge to the issues we work on, and to an ever-growing list of individuals and organizations with whom we are partnering in our work.

Hang on, the next two years will be a bumpy ride. But PEER's unique blend of civil service and environmental work means we are well-placed to continue our fight to protect public employees and the environment and to make a meaningful difference in rebuilding efforts that will occur in the very near future.

We hope you will donate to help support this effort by using the enclosed envelope or visiting peer.org/donate. The demand for our work is growing—our goal is to continue to raise funds to help support this work.

Many thanks,
The PEER Team



PEER's client Sarah Sullivan, former Tribal Section Manager at EPA, describes the difficulties she faced after signing a public letter of dissent urging EPA to uphold its mandate to protect human health and the environment. Learn more about her case in this video: peer.org/sarah-epa

We Thank You!

*We want to take a moment to thank the **871 donors** who made a donation to PEER this past fiscal year. Your commitment to our work is both inspirational and deeply appreciated. Thank you for believing in our mission and for standing up for public employees who protect the environment!*



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The Space Race Is Leaving The Environment Behind (continued from page 1)

satellite will unfold a mirror roughly a tenth of an acre wide at 600–650 km altitude and steer reflected sunlight to chosen spots on the ground, with each beam approximately three miles wide. The company calls it a testbed, with publicly stated plans to scale up to 50,000 satellites by 2035.

After PEER and DarkSky filed comments in March, the FCC's Space Bureau granted Reflect Orbital's application on July 9, 2026, finding it served the public interest and fell outside the environmental review requirements of the National Environmental Policy Act. PEER, DarkSky International, American Bird Conservancy, and Environment America have now asked the full Commission to review and reverse that decision.

The Sum of the Parts

Each of these decisions is being propelled

forward by a deregulatory agenda that ignores both the effects of these actions on the United States as well as possible mitigation measures that could be taken to lessen the impacts. Launches, reentries, reflected light, orbital debris, and upper-atmosphere pollution add up. Migratory birds that navigate by starlight, nocturnal wildlife, the ozone layer, astronomers, and anyone who values a dark sky all bear the combined burden. No agency will look at the whole picture, and the public has had no voice in the process.

PEER will keep pressing federal agencies to follow the law, to study these impacts before approving projects, and to give the public a seat at the table on these important emerging issues.

Louisiana: A Preview of What's Coming

The consequences are already visible

on the ground. SpaceX has announced plans to build a 125,000-acre facility that could launch about 30 rockets per day in the coastal marshes of Vermilion Parish, Louisiana. State officials call it a \$100 billion investment, but lawmakers helped ease regulations and negotiations were covered under nondisclosure agreements. Local residents learned the details after the fact.

There are many reasons to be concerned about the impacts of these rocket launches — obvious reasons are the impacts to air, water, and fisheries — another is the millions of migratory birds that use the Mississippi Flyway.

Secret deals, waived reviews, and fast-tracked approvals show how public resources, including our skies, our coasts, and our atmosphere, are being handed over to serve the ambitions of a few very wealthy individuals.