



Alliance of Nurses for Healthy Environments

Bringing Science and Passion to the Environmental Health Movement

STEERING COMMITTEE

Azita Amiri, PhD, RN
Laura Anderko, PhD, RN
Suellen Breakey, PhD, RN
Adelita Cantu, PhD, RN
Lisa Campbell, DNP, RN, APHN-BC
Doriam Camacho Rodriguez, PhD, RN
Anabell Castro Thompson, MSN, APRN, ANP-C, FAAN, FAANP
Cara Cook, MS, RN, AHN-BC
Kathy Curtis, LPN
Tammy Davis, BS, RN
Karen G. Duderstadt, PhD, RN
Tom Engle, MN, RN
Robyn Gilden, PhD, RN
Katie Huffling, RN, MS, CNM, FAAN
Kelly K. Jones, PhD, RN
Jeanne Leffers, PhD, RN
Ruth McDermott-Levy, PhD, RN
Elizabeth Mizelle, PhD, RN-BC, CNE
Tedd M. Potter, PhD, RN, FAAN, FNAP
Aaron Salinas, DNP, APRN, FNP-BC, PMHNP-BC, NRP
Barbara Sattler, RN, DrPH, FAAN
Beth Schenk, PhD, MHI, RN
Daniel J. Smith, PhD, RN, CNE
Lisa M. Thompson, PhD, RN, FNP, FAAN
Nelson Tuazon, DNP, DBA, RN, NEA-BC, CENP, CPHQ, CPPS, FNAP, FACHE, FAAN
Tia Wackerhagen, RN, BSN
Mary Jane Williams, PhD, RN

February 21, 2025

Support: The CHERISH our Communities Act: from Cumulative Harms to Environmental Restoration for Improving Shared Health (SB 978)

The Alliance of Nurses for Healthy Environments (ANHE) supports the CHERISH our Communities Act in Maryland.

Nurses consistently see evidence of the health harms of toxic environmental exposures in our everyday work and are often the “eyes and ears” of the care teams in which we work.

As the only national nursing organization focused solely on the intersection of health and the environment, ANHE supports a cumulative impact analysis and approach. Using a cumulative impacts framework¹ makes regulating over 80,000 chemicals possible, and can potentially reduce disparities² in environmental exposure which is especially important for Black, Brown, and low-income communities who are exposed to higher levels of pollution. Cumulative impact assessment has been endorsed by governments, scientists, and communities as a process that can demonstrate a need for greater environmental protections through its examination of multiple environmental, social, and health burdens and stressors many of which occur at the same time and are concentrated in low-income and communities of color.³

As nurses and healthcare providers, we know that nobody is exposed to one pollutant at a time. Peoples’ actual lived experience includes exposure to multiple pollutants, from multiple sources, interacting with other stressors in real time. Environmental exposures continue to occur at every level of human development and can have a single effect or cumulative effects across the lifespan.

ANHE applauds steps taken in recent years at the federal level on

¹ Ellickson, K. (February 13, 2023). *When it comes to the cumulative impacts of pollution, the science is in.* Union of Concerned Scientists. <https://blog.ucsusa.org/kellickson/when-it-comes-to-the-cumulative-impacts-of-pollution-the-science-is-in/>

² National Environmental Justice Advisory Council (NEJAC). (October 4, 2024). *Reducing cumulative and disproportionate impacts and burdens in environmental justice communities.* <https://www.epa.gov/system/files/documents/2024-11/nejac-recommendations-for-reducing-cumulative-and-disproportionate-impacts-and-burdens-in-environmental-justice-communities.pdf>

³ See citation 2 [NEJAC]



Alliance of Nurses for Healthy Environments

Bringing Science and Passion to the Environmental Health Movement

cumulative impacts.^{4,5,6,7} However, many chemicals which have long been known to be dangerous such as lead, ethylene oxide and vinyl chloride remain in use harming our patients, communities and workers across the nation.

This is a moment in our country for states to take the lead. ANHE supports a cumulative impact approach in all levels of government from the federal, to state, local, and Sovereign Nation governments. States like New Jersey⁸ and Massachusetts,⁹ and local governments have been leading the way¹⁰ in cumulative impacts policies and method developments.

There is a history of cumulative impacts implementation or written protocols for implementation, including the State of New Jersey's rule,¹¹ the Massachusetts rule,¹² and the Minnesota law's process document.¹³ This is certainly not an exhaustive list, and demonstrates a large body of work that deserves continued attention and growth, and implementation in overburdened communities.

Maryland lags behind other states that have passed laws requiring assessment of the cumulative impacts of multiple polluters on the same community. As nurses, we are led by our professional obligations¹⁴ which make addressing health, environment and safety a professional focus. In Maryland, many communities face a barrage of pollution sources. In South Baltimore alone, residents are surrounded by nearly 100 EPA-regulated polluting facilities, including:

- A massive trash incinerator, the nation's largest medical waste incinerator, and multiple landfills.
- A wastewater treatment plant and an animal rendering plant. An open-air coal terminal, a coal ash landfill, and oil and gas tanks.

⁴ Biden, Joseph R., (January 20, 2021). *Executive Order 13985, Advancing racial equity and support for underserved communities throughout the federal government.* <https://www.govinfo.gov/content/pkg/FR-2021-01-25/pdf/2021-01753.pdf>

⁵ U.S. EPA. (April 2022). *Executive Order 13985 Equity Action Plan.* https://www.epa.gov/system/files/documents/2022-04/epa_equityactionplan_april2022_508.pdf

⁶ U.S. EPA, (February 14, 2024). *Equity Action Plan.* <https://www.epa.gov/system/files/documents/2024-02/epa-2023-equity-action-plan.pdf>

⁷ U.S. EPA. (2022). *Cumulative impacts research: Recommendations for EPA's Office of Research and Development.* https://cfpub.epa.gov/si/si_public_record_report.cfm?dirEntryId=357832&Lab=ORD&simplesearch=0&showcriteria=2&sortby=pubDate&searchall=357832&timstype=&datebeginpublishedpresented=05/17/2021

⁸ New Jersey Administrative Code (N.J.A.C.) N.J.A.C. 7:1C *Environmental justice.* https://dep.nj.gov/wp-content/uploads/rules/rules/njac7_1c.pdf

⁹ MassDEP. (March 29, 2024). *Cumulative impact analysis in air quality permitting.* <https://www.mass.gov/info-details/cumulative-impact-analysis-in-air-quality-permitting#regulations->

¹⁰ Tishman Center. (Sept 28, 2022). *Understanding the evolution of 'cumulative impacts' definitions and policies in the U.S.* <https://www.tishmancenter.org/blog/new-research-understanding-the-evolution-of-cumulative-impacts-definitions-and-policies-in-the-us>

¹¹ See citation 8 [N.J. A.C.]

¹² See citation 9 [MassDEP]

¹³ Minnesota Pollution Control Agency. Air permitting in south Minneapolis <https://www.pca.state.mn.us/business-with-us/air-permitting-in-south-minneapolis>

¹⁴ American Nurses Association. (2020). *Nursing: Scope and Standards of Practice (4th ed.)*. Standard 18: Environmental Health. ANA: Silver Spring, MD.



Alliance of Nurses for Healthy Environments

Bringing Science and Passion to the Environmental Health Movement

- Asphalt production plants, chemical manufacturing, and heavy truck routes surround the community's rec center.

Pollution from all of these facilities combine with each other and compound with other inequalities to produce more and worse health impacts. In South Baltimore, failure to act has even led to the involuntary displacement of entire communities.

ANHE supports the work of local advocacy groups such as the South Baltimore Community Land Trust and their efforts to create healthier environments. Communities, which have been long overburdened with pollution and inadequate regulatory practices, need to have their concerns addressed and problems solved.

Maryland must amend its permitting process to incorporate decisions about cumulative impacts. Residents of overburdened and underserved communities deserve a permitting process that recognizes that multiple polluters can create more health harms than individual polluters. Maryland deserves a gold-standard permitting process that learns from the significant environmental justice gains other states have adopted in the past five years.

The Alliance of Nurses for Healthy Environments appreciates the opportunity to support The CHERISH our Communities Act for robust health protective standards for Maryland residents.