



Alliance of Nurses for Healthy Environments
Bringing Science and Passion to the Environmental Health Movement

March 11, 2025

Support: HB 1484 House Environment and Transportation Committee

Position: SUPPORT

Dear Chair Korman and Members of the Committee,

The Alliance of Nurses for Healthy Environments (ANHE) appreciates the opportunity to comment on our support for HB 1484¹ the CHERISH Our Communities Act.

With nurse members in all 50 states, including Maryland, ANHE is the only national nursing organization focused solely on the intersection of health and the environment. Nurses are led by our professional obligations² which make addressing health, environment, and safety a professional focus. 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. 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.

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 framework³ makes regulating over 80,000 chemicals possible, and can potentially reduce disparities⁴ 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.⁵

The CHERISH Act prioritizes Maryland residents’ well-being and ensures that the Maryland Department of the Environment’s (MDE) decision-making processes are transparent and inclusive. The bill will address the disproportionate environmental and public health harms that environmental justice communities in Maryland face from pollution generating facilities. For centuries, these facilities have been disproportionately and deliberately sited in minority and economically distressed communities in Maryland. Low-wealth, Black, and other communities

¹ Maryland General Assembly. (2025). HB 1484. Environmental Permits – Requirements for Public Participation and Impact and Burden Analyses. (Cumulative Harms to Environmental Restoration For Improving Shared Health – CHERISH Our Communities Act). <https://mgaleg.maryland.gov/2025RS/bills/hb/hb1484F.pdf>

² American Nurses Association. (2021). *Nursing: Scope and Standards of Practice (4th ed.)*. Standard 18: Environmental Health.

³ 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/>

⁴ 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>

⁵ See citation 4 [NEJAC, 2024].



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of color in Maryland face greater cancer risks and exposure to air toxics⁶ due to higher pollution burden. The CHERISH Act will cover census tracts with an Environmental Justice (EJ) score of 75 or higher on the Maryland EJ Screening tool, and communities within a 1.5 miles radius around these census tracts. A high EJ score means higher exposure to pollutants combined with sensitive populations and underserved demographics. Maryland Department of the Environment's (MDE) will make information about enforcement actions against permitted facilities in covered areas easily available online and direct 25% of penalties from enforcement actions to the impacted communities. This targeted approach, based on priorities identified by environmental justice communities in Maryland, fills a critical gap in MDE's current permitting authority to protect public health in Maryland's most polluted communities.

This is a moment in our country for states to take the lead. States like [New Jersey](#),⁷ [Massachusetts](#),⁸ [Minnesota](#)⁹ and [local governments](#)¹⁰ have been leading the way in cumulative impacts policies and method developments. Yet Maryland lags behind these other states that have passed laws requiring assessment of the cumulative impacts of multiple polluters on the same community. 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.
- Asphalt production plants, chemical manufacturing, and heavy truck routes surround the community's rec center.

In South Baltimore, failure to act has even led to the involuntary displacement of entire communities.

The CHERISH Our Communities Act amends Maryland's environmental law to provide adequate environmental impact assessment and opportunities for public participation for new, renewed, and expanded environmental permits that are issued by the MDE. Currently, many environmental permit applications do not even include a public engagement process, and do not take into consideration the cumulative harms posed by multiple and historic sources of pollution.

⁶ Apelberg, B.J., Buckley, T.J., & White, R.H. (2005). Socioeconomic and racial disparities in cancer risk from air toxics in Maryland. *Environ Health Perspect.* 2005 Jun;113(6):693-9. <https://doi.org/10.1289/ehp.7609>

⁷ 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

⁸ 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->

⁹ Minnesota Pollution Control Agency. Air permitting in south Minneapolis <https://www.pca.state.mn.us/business-with-us/air-permitting-in-south-minneapolis>

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>



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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.

Sincerely,

Katie Huffling, DNP, RN, CNM, FAAN

Executive Director, Alliance of Nurses for Healthy Environments

katie@enviRN.org