



Alliance of Nurses for
Healthy Environments

ALLIANCE OF NURSES FOR HEALTHY ENVIRONMENTS

BRINGING SCIENCE AND PASSION TO THE ENVIRONMENTAL HEALTH MOVEMENT

February 27, 2026

Senate Education, Energy, and the Environment Committee

Re: Letter of Support for CHERISH our Communities Act: from Cumulative Harms to Environmental Restoration for Improving Shared Health (SB0780)

Dear Chair Feldman and Members of the Committee,

The Alliance of Nurses for Healthy Environments (ANHE) appreciates the opportunity to provide comments in strong support of SB0780, the CHERISH Our Communities Act applying to Certificates of Public Convenience and Necessity (CPCNs) for polluting energy generation.

The Alliance of Nurses for Healthy Environments (ANHE) is the leading global nursing organization focused on the intersection of human health and planetary health. With over 10,000 members nationwide and over 550 nurse members in Maryland, 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.

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

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>



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throughout one's life. 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 cumulative impacts.^{3,4,5,6} However, Maryland can take further action. States like New Jersey⁷ and Massachusetts,⁸ and local governments have been leading the way⁹ 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,¹⁰ the Massachusetts rule,¹¹ and the Minnesota law's process document.¹² 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 pollutants on the same community. As

³ 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>

⁴ 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

⁵ U.S. EPA, (February 14, 2024). *Equity Action Plan.* <https://www.epa.gov/system/files/documents/2024-02/epa-2023-equity-action-plan.pdf>

⁶ U.S. EPA. (2022). *Cumulative impacts research: Recommendations for EPA's Office of Research and Development.*

https://cfpub.epa.gov/si/sj_public_record_report.cfm?dirEntryId=357832&Lab=ORD&simplesearch=0&showcriteria=2&sortBy=pubDate&searchall=357832&fimsType=&datebeginpublishedpresented=05/17/2021

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 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>

¹⁰ See citation 8 [N.J. A.C.]

¹¹ See citation 9 [MassDEP]

¹² Minnesota Pollution Control Agency. *Air permitting in south Minneapolis*

<https://www.pca.state.mn.us/business-with-us/air-permitting-in-south-minneapolis>



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nurses, we are led by our professional obligations¹³ 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.
- 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.

SB0780 is targeted in geography - it will apply to parts of the state that are burdened by disproportionate pollution and it is targeted in scope meaning it will apply only to polluting energy generation (not wind, solar, or geothermal).

¹³ American Nurses Association. (2020). *Nursing: Scope and Standards of Practice (4th ed.)*. Standard 18: Environmental Health. ANA.





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Because of this limited scope, the bill will apply to very few projects each year and will not strain state resources to administer.

SB0780 prevents new polluting energy generation from being built if the Public Service Commission determines, through a deliberative public process with public input, that allowing it to be built would contribute to a disproportionate pollution and health burden on the nearby community. This transparent process allowing for community input is an integral part of environmental justice for communities.

No one should be in favor of forcing environmental justice communities that are already overburdened by pollution to host even more pollution to put more electricity on our regional grid to benefit communities far away - or data center power demands. We urge you to support SB0780.

Sincerely,

A handwritten signature in black ink that reads "Katie Huffling". The signature is written in a cursive, flowing style.

Katie Huffling, DNP, RN, CNM, FAAN

Executive Director

Alliance of Nurses for Healthy Environments



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