



Alliance of Nurses for  
Healthy Environments

## ALLIANCE OF NURSES FOR HEALTHY ENVIRONMENTS

*BRINGING SCIENCE AND PASSION TO THE ENVIRONMENTAL HEALTH MOVEMENT*

March 6, 2026

House Committee on Environment and Transportation

**Re: Letter of Support for CHERISH our Communities Act: from Cumulative Harms to Environmental Restoration for Improving Shared Health (HB1268)**

Dear Chair Korman and Members of the Committee,

The Alliance of Nurses for Healthy Environments (ANHE) appreciates the opportunity to provide comments in strong support of HB1268, the CHERISH Our Communities Act applying to MDE-issued permits.

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 framework<sup>1</sup> makes regulating over 80,000 chemicals possible, and can potentially reduce disparities<sup>2</sup> 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 throughout one's life. Environmental exposures continue to occur at every level

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<sup>1</sup> 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/>

<sup>2</sup> 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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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.<sup>3,4,5,6</sup> However, Maryland can take further action. HB1268 incorporates consideration of cumulative impacts into Maryland's process of issuing permits to pollute, based on laws already passed in New Jersey, Minnesota, and New York. New Jersey's bill<sup>7</sup> has already gone into implementation and won against a legal challenge from polluting industry interests. States like New Jersey and Massachusetts,<sup>8</sup> and local governments have been leading the way<sup>9</sup> in cumulative impacts policies and method developments.

Maryland lags behind other states that have passed laws requiring assessment of the cumulative impacts of multiple pollutants on the same community. As nurses, we are led by our professional obligations<sup>10</sup> 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

<sup>3</sup> 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>

<sup>4</sup> 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](https://www.epa.gov/system/files/documents/2022-04/epa_equityactionplan_april2022_508.pdf)

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

<sup>6</sup> 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&timstype=&datebeginpublishedpresented=05/17/2021](https://cfpub.epa.gov/si/sj_public_record_report.cfm?dirEntryId=357832&Lab=ORD&simplesearch=0&showcriteria=2&sortBy=pubDate&searchall=357832&timstype=&datebeginpublishedpresented=05/17/2021)

<sup>7</sup> 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](https://dep.nj.gov/wp-content/uploads/rules/rules/njac7_1c.pdf)

<sup>8</sup> 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>

<sup>9</sup> 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>

<sup>10</sup> American Nurses Association. (2020). *Nursing: Scope and Standards of Practice (4th ed.)*. Standard 18: Environmental Health. ANA.





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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.

Careful consideration has been given to HB1268 as it is targeted in geography and it applies only to parts of the state that are burdened by disproportionate pollution. The bill is also targeted in scope, meaning it will apply to a specific list of types of permits, mostly air pollution permits, water pollution permits for a narrow list of types of industries, and waste disposal permits. HB1268 will not impact most businesses, and will not impact housing or other construction, unless it is the construction of a facility that would pollute.

Currently, nearby communities have no opportunity to give public comment on several types of permits to pollute, including more than half of air pollution permits. The CHERISH Our Communities Act will ensure public participation in the process and fix this longstanding environmental injustice.

HB1268 prevents new polluters from being built in environmental justice communities. If the Maryland Department of the Environment determines,





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through a deliberative public process with public input, that allowing a facility to be built would contribute to a disproportionate pollution and health burden on the nearby community. The bill will also reduce pollution from existing facilities when their permits are being renewed if MDE determines that facility is contributing to a disproportionate pollution and health burden on the nearby community.

Communities, which have been long overburdened with pollution and inadequate regulatory practices, need to have their concerns addressed and problems solved. We believe HB1268 is a significant step towards this goal and urge you to support HB1268.

Sincerely,

A handwritten signature in black ink that reads "Katie Huffling".

**Katie Huffling, DNP, RN, CNM, FAAN**

**Executive Director**

**Alliance of Nurses for Healthy Environments**



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