

March 16, 2026

**Senator Brooks**

303 James Senate Office Building  
11 Bladen Street  
Annapolis, MD 21401  
via: Maryland Matters article: “benjamin.brooks@senate.maryland.gov

**Senator Harris**

Education, Energy, and the Environment Committee  
302 James Senate Office Building  
11 Bladen Street  
Annapolis, MD 21401  
via: kevin.harris@senate.maryland.gov

**District 27 Team**

Delegate Jeffrie E. Long, Jr.  
Delegate Darrell Odom

**The Maryland General Assembly**

**Education, Energy, and the Environment Committee**  
SB0780 | SB0781  
AA\_EHE@mga.maryland.gov (for the record)  
brian.feldman@senate.maryland.gov

**Environment and Transportation Committee**  
HB 1268 | HB1287  
AA\_ENT@mga.maryland.gov (for the record)  
Marc.Korman@house.maryland.gov

**Re: Notice Regarding MDEnviroScreen, CHERISH Act Bills, and Related Federal Review Requests**

**Referenced:** Federal activity includes EPA’s referral of **Complaint No. 03-26-R3** to the **PHMSA Office of Civil Rights** and EPA’s referral of **Complaint No. 03RA-25-R3** to the **EPA Office of Inspector General**, as well as a separate request for an **Affirmative Compliance Review** submitted to EPA’s **External Civil Rights Division**.

Dear Senator Brooks and Senator Harris, District 27 Team:

We write on behalf of the **Brandywine TB Southern Region Neighborhood Coalition (“BTB Coalition”)**, in alignment with **2Bridge Community Development Exchange (“2Bridge CDX”)**, to place you on formal notice regarding serious concerns surrounding **MDEnviroScreen** and its relationship to the two CHERISH Act measures you sponsor: **Senate Bill 780, Certificate of Public Convenience and Necessity – BURDEN Analysis (CHERISH Our Communities Act)**, and **Senate Bill 781, Environmental Permits – Requirements for Burden Analysis, Issuance and Renewal, and Public Participation (Cumulative Harms for Environmental Restoration for Improving Shared Health – CHERISH Our Communities Act)**.

This notice is necessary because the issues surrounding MDEnviroScreen are no longer confined to a technical mapping dispute. They now intersect directly with proposed legislation that would give the **Maryland EJ Tool** and **EJ Score** real legal and procedural force. As introduced, **SB 780** would use the Maryland EJ Tool in identifying **at-risk census tracts** and in requiring **BURDEN analysis** for certain **CPCN** applications, while **SB 781** would require burden analysis, issuance and renewal findings, and public-participation measures for covered environmental permits in at-risk census tracts. In plain terms, the same screening methodology now under challenge is also being positioned for deeper use in Maryland law.

# Brandywine/TB, Southern Region Neighborhood Coalition

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It is important to state clearly that this issue did not begin with the 2026 bills. The path to CHERISH traces back through the **2019 Title VI / Informal Resolution Agreement process**, the related CPCN public-participation framework, and the long-running debate over what screening methodology Maryland would use to identify burdened communities and trigger protections. From BTB's standpoint, that history matters because the directly affected community made clear from the outset that the screening question was a gatekeeping issue. It would determine how cumulative burden was measured, which communities would be recognized, and what protections would be triggered. For that reason, BTB's insistence on being **at the table** was never symbolic and never optional. It was a substantive demand tied to protection, accountability, and civil-rights compliance. If a community is expected to live with the consequences of the screen, then that community must have a direct role in the design, revision, and operational use of the screen.

## I. THE PEOPLE WHO ELECT YOU SHOULD NOT HAVE LESS ACCESS THAN THE PEOPLE WHO MARKET THEMSELVES AS SPEAKING FOR THEM.

Therefore, the BTB also raises a broader democratic-accountability concern. Directly affected constituents appear to be confined to compressed public-comment windows, while intermediary coalitions and affiliated advocacy actors appear to receive more sustained access, more informal influence, and more meaningful opportunities to shape policy design. That imbalance is not a minor process flaw. It creates the appearance, and potentially the reality, that substitute representation is being privileged over direct constituent accountability. Environmental justice legislation cannot credibly claim to be community-centered if the people most affected are afforded only symbolic participation while others exercise the real shaping power.

## II. BTB'S POSITION IS STRAIGHTFORWARD:

Maryland should not embed **MDEnviroScreen** more deeply into statutory and procedural frameworks unless and until the State can publicly demonstrate that the tool is methodologically sound, transparent, and not materially underprotective when compared with robust cumulative-impacts screens or with the federal disadvantaged-community framework used in **IRA / Justice40** implementation. Our concern is that MDEnviroScreen is being used as if it were simply interchangeable with stronger cumulative-burden models when that equivalency has not been demonstrated on the public record.

## III. THIS CONCERN IS NOT ABSTRACT.

The record now reflects that removal of key factors from MDEnviroScreen lowered **Brandywine's EJ score** and that the score reduction was methodological, not evidence of reduced burden. The practical consequence is serious: once a weakened or underexplained score is used in statutory triggers, BURDEN analysis, permit review, CPCN proceedings, public notice, or environmental-justice outreach, the rollback does not remain on a map. It affects who is recognized, who triggers heightened review, who receives notice, and who may be left carrying the burden.

**BTB further places on record that**, to date, there has been **no direct communication, consultation, or collaboration with your office involving BTB Coalition** on these MDEnviroScreen and CHERISH-related issues, despite the fact that Brandywine is a directly affected frontline community and despite the long history of Title VI, CPCN, and environmental-justice engagement tied to this subject matter. Yet the surrounding advocacy posture has repeatedly suggested the presence of a broader coalition or "community" alignment without clear public disclosure as to **who is actually speaking, on whose authority, and whether directly impacted communities such as Brandywine were meaningfully included**. That is a serious process concern. Environmental justice legislation should not be shaped through intermediary, substitute, or undisclosed coalition representation while the affected community itself is left outside the room.

To be clear, this letter places that concern squarely on the record. If your office has been hearing from organizations, collaborators, or coalition actors presenting themselves as reflecting community alignment on the screening framework or the CHERISH architecture, then BTB is entitled to know whether those actors were treated as speaking for directly impacted communities and on what basis. No one should be writing environmental justice law for Brandywine while bypassing Brandywine.

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We are also advising you that related concerns are being placed before federal offices through separate review requests and companion submissions. Those submissions concern, among other things, whether the protections the community understood would govern **CPCN-related review** after the **Title VI / IRA process** were later narrowed in practice, whether the State moved from an **EJSCREEN- and participation-based framework** toward a narrower screening and faster review structure, and whether those developments are now being carried forward into active policy through **CHERISH-related frameworks**. This is precisely why we are writing to you directly: the issue before federal reviewers and the issue before the General Assembly are now the same issue — **whether Maryland is building environmental justice protection on a weakened screening foundation**.

We therefore respectfully ask that you review these concerns closely before advancing reliance on MDEnviroScreen in CHERISH-related legislation. At minimum, the General Assembly should not assume equivalency where equivalency has not been proven. If the Maryland EJ Tool is to serve as a statutory trigger for BURDEN analysis, permit scrutiny, or CPCN review, then the methodology, exclusions, comparability, and operational consequences should be fully understood on the public record, with direct affected-community accountability built into that process.

Please accept this letter as formal notice that these concerns are active, documented, and material to the CHERISH Act framework. Our purpose is not to weaken environmental justice legislation. It is the opposite. It is to ensure that any law enacted in the name of environmental justice is built on a foundation strong enough to protect the communities it claims to serve.

Respectfully submitted,



**Kamita Gray**

Lead Complainant, President – BTB Coalition | ECCB

ECCB Directorial Chair – ECCB Community Citizens Board, Neighborhood Leadership Council (NLC)

2Bridge CDx: Affected Community Equitable Environmental Mitigation Platform

cc: **External Civil Rights Division / Office of Civil Rights & Adjudication**

**U.S. Environmental Protection Agency**

Washington, DC 20460

**Office of Civil Rights / Pipeline and Hazardous Materials Safety Administration**

**U.S. Department of Transportation**

**Office of the Inspector General**

U.S. Environmental Protection Agency

**Delegate Andre V. Johnson, Jr.**

andre.johnson@house.maryland.gov

## Attachments

- 1.) 16MAR26\_EPA|MDE ReRej&RefLtr\_03a
- 2.) 03\_MDEnviroScreen\_vs\_CalEnviroScreen\_Formal\_Memorandum.pdf
- 3.) 03\_MDEnviroScreen\_vs\_CalEnviroScreen\_One\_Page\_Advocacy\_Summary.pdf
- 4.) State\_by\_State\_EJ\_Screen\_Comparison\_Rapid\_Review.pdf

## Exhibits

- A. Maryland Matters article: “Maryland opens fast-track permitting process for new energy projects.”
- B. Maryland Matters article: “Maryland redrew an environmental justice map; polluted communities feel left out”
  - 1.) September 8, 2025, Written Record Narrative

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## EXHIBIT A

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PART OF STATES NEWSROOM



## MARYLAND MATTERS

GOV & POLITICS ENVIRONMENT HEALTH EDUCATION JUSTICE TRANSPORTATION WORK & THE ECONOMY

ENVIRONMENT GOV & POLITICS

### Maryland opens fast-track permitting process for new energy projects

Some are skeptical that program will attract significant new power generation to the state

BY: CHRISTINE CONDON - OCTOBER 1, 2025 1:11 AM



Maryland House Speaker Adrienne A. Jones (D-Baltimore County) at a Randallstown news conference last week, flanked by the governor and senate president, who gathered to tout an electricity bill refund heading to customers amid soaring energy costs. (Photo by Christine Condon/ Maryland Matters)

Maryland opened the door Tuesday to a program that could fast-track energy projects through the state's regulatory process in hopes of boosting the amount of power generated in the state.

For the [next 30 days](#), the Public Service Commission will accept applications for large-scale power projects or "dispatchable" generation, which can provide energy quickly during periods of peak demand.

Selected applicants will get an expedited PSC review that could lead to a Certificate of Public Convenience and Necessity – a green light for construction – in 295 days, or nine to 10 months.

Lawmakers, utilities and energy companies are expected to watch the 30-day application window closely, with Maryland Senate President Bill Ferguson (D-Baltimore City) at an [event last week](#) calling it a litmus test for the future of energy generation in Maryland.

"That will be very indicative as to what the market may look like for domestic generation here in Maryland," Ferguson said. "We will learn a lot from that open auction to see what merchant generators will put forward."

<https://marylandmatters.org/2025/10/01/maryland-opens-fast-track-permitting-process-for-new-energy-projects/>

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## EXHIBIT B

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## MARYLAND MATTERS

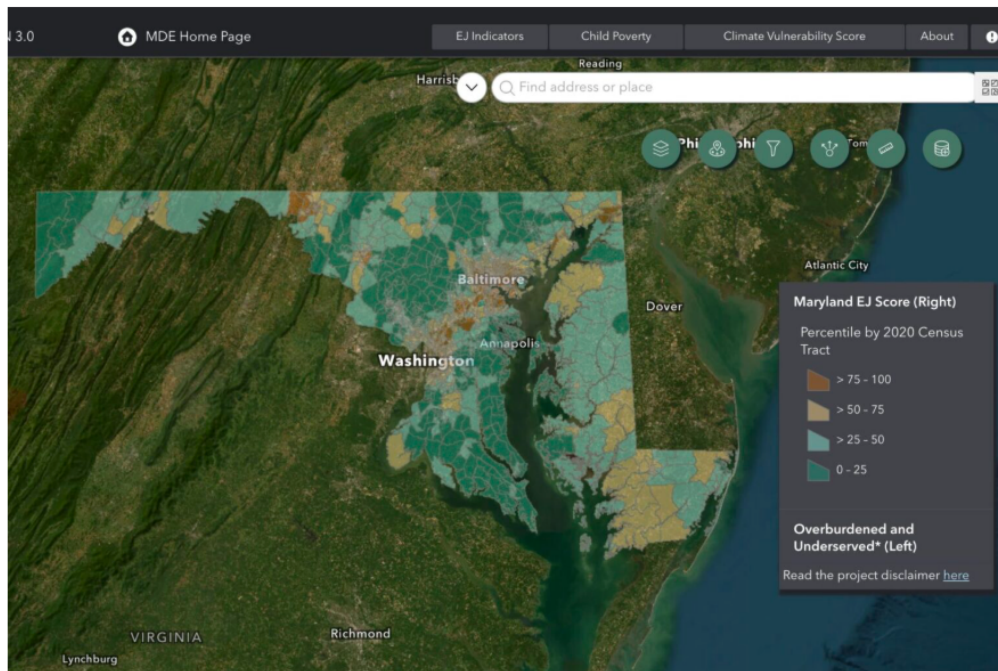
GOV & POLITICS ENVIRONMENT HEALTH EDUCATION JUSTICE TRANSPORTATION WORK & THE ECONOMY

ENVIRONMENT GOV & POLITICS

### Maryland redrew an environmental justice map; polluted communities feel left out

Restored map excludes race, ethnicity and language from formula for setting environmental justice score, leaving advocates dismayed

BY: CHRISTINE CONDON - SEPTEMBER 29, 2025 12:30 AM



A new iteration of the Maryland Department of the Environment's environmental justice map has drawn concern from advocates, who say that some communities facing pollution issues are seeing lowered scores despite continued burdens. (Screenshot by Christine Condon/ Maryland Matters)

A state map showing “environmental justice” communities is back online, after the state lost access, in a Trump administration purge, to federal data about communities considered overburdened by pollution and underserved by government services.

But the Maryland Department of the Environment removed race, ethnicity and language data from the calculus that determines an area's environmental justice score on the [updated map](#), leaving some environmental advocates scratching their heads.

Brandywine – a majority-Black Prince George's County community surrounded by gas-fired power plants, a coal ash dump, a Superfund site and more – has long been considered a poster child for environmental injustice in Maryland. After being ranked above the 75th percentile in the previous map, a qualifier for more careful scrutiny in environmental permitting, it now has a score of 63 out of 100.

“It's just a map change. It's not a reality change,” said Brandywine community leader Kamita Gray. “It just appears to me that MDE blatantly does not want to be accountable in the massive pollution and the overburden of these heavy industrial industries.”

<https://marylandmatters.org/2025/09/29/maryland-ej-map-brandywine-cherish-act/>

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## EXHIBIT B-1

Gmail - Re: Subject: Brandywine's EJ Score Drop: Manipulation, ... <https://mail.google.com/mail/u/3/?ik=4f611dec3f&view=pt&search...>



BTB ECCB <[btb.eccb@gmail.com](mailto:btb.eccb@gmail.com)>

### Re: Subject: Brandywine's EJ Score Drop: Manipulation, Not Justice Urgent Concerns & Formal Letter

1 message

Sacoby Wilson <[swilson2@umd.edu](mailto:swilson2@umd.edu)>

Mon, Sep 8, 2025 at 11:12 AM

To: BTB ECCB <[btb.eccb@gmail.com](mailto:btb.eccb@gmail.com)>

Cc: MDE.Secretary@maryland.gov, adam.ortiz@maryland.gov, ej.mde@maryland.gov, brandon.brooks@maryland.gov, regina.boyce@house.maryland.gov, "Feldman, Brian Senator (District)" <[Brian.Feldman.District@senate.state.md.us](mailto:Brian.Feldman.District@senate.state.md.us)>, michael.jackson@senate.state.md.us, sara.love@senate.maryland.gov, Camille.burke@baltimorecity.gov, meena.seshamani@maryland.gov, mary.lehman@house.state.md.us, monica.nichelle@gmail.com

Hi BTB Team,

Thanks for the email. Sorry for my slow response. MAJC-Maryland leadership and collaborators have also expressed concerns about the removal of race and language in MDEnviroScreen which was done to be in compliance with Trump's anti-DEI and environmental justice EO. Unfortunately, as you rightly mentioned, this has reduced the EJ score for Brandywine and other parts of the state. Fortunately, THE EJ lab team is working on an updated version of MDEJSCREEN3.2 and we are leveraging this work through a collaboration with MDE team members with the goal of improving MDEnviroScreen's domain structure, indicators, and scoring methodology to better represent and visualize environmental justice across the state of Maryland including Brandywine. I suggest that you and your team join other community voices particularly folks from SBCLT and SESH in pushing MDE to address the gaps in the current version of the tool and provide your input on how to improve it.

I support most of the actions (1) to (5), you have outlined in the letter. I am not sure what the independent audit will do because US EPA EJSCREEN is no longer up and available. My team is currently doing a review and comparison of all national and state level environmental justice screening and mapping (EJSM) tools that should be available by the end of September. This could be helpful in looking at the state of the practice of tools across the country and see what indicators should be included that are spatially-relevant beyond current indicators in MDEnviroScreen. As you know, I have been very supportive of BTB regarding the Title VI complaint including connecting Kamita with folks who have submitted Title VI complaints and provided legal support on complaints. I think if there hasn't been compliance with the Title VI agreement, it's your right to fight for it, hold MDE and other agencies accountable (that's representative justice), and seek other remedies as needed- items (3) to (5). I am not sure if you have met with the Secretary and her team about the Title VI Complaint including Assistant Secretary Atkinson. I believe MDE has changed under Secretary McIlwain, bigger focus on environmental justice, and more staffing. Hopefully, your engagement with them will lead to more compliance with the 2016 agreement. And also please do not forget to hold other state agencies accountable who are parties to the agreement.

In response to your rollback comment, I am a little confused. I was a member of the Governor's transition team (Co-Chair of the Climate and Environment Workgroup). I led the development of the EJ section of the Climate and Environment chapter which included a synthesis of feedback from stakeholders who participated in a series of listening sessions. Did BTB participate in any of these sessions? I believe a number of representatives of EJ groups and activists did. In the EJ section, there are a number of items that were included based on my experiences doing EJ work, community feedback over the years, stakeholder feedback from the listening sessions, and best practices including: 1) An Executive Order on Environmental Justice, 2) cumulative impacts legislation, 3) Justice40, 4) Title VI, 5) air quality policy, 6) urban heat and heat-related disparities, and 7) public health and health disparities. I suggest that your team review the EJ section of the transition plan. There are some really good recommendations that ya'll should be fighting for.

Of course, I would be in attendance at an event related to the signing of the Executive Order. That doesn't mean that the job is done. The Executive Order is a means, it's not the end. The end is

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## EXHIBIT B -2

Gmail - Re: Subject: Brandywine's EJ Score Drop: Manipulation, ... <https://mail.google.com/mail/u/3/?ik=4f611dec3f&view=pt&search...>

addressing environmental injustice and related inequities. The Executive Order is only a tool.

Advocates should also be asking for the Governor to do more and hold him accountable for what was outlined in his transition plan including his EJ plan. Additionally, we should be leveraging the Executive Order to hold the new IAC accountable, and hold state agencies accountable as they develop and implement their strategic plans. This would be a great opportunity to request that as a part of the strategic planning process, each agency has a series of listening sessions with impacted stakeholders and co-develop the strategic plans following the collaborative governance approach, one approach that I like to use is EPA's Collaborative Problem-Solving Model. In this way, you or any EJ group, can advocate for Title VI enforcement, NEPA reviews with HIAs, cumulative impacts analysis, regulatory compliance, enhanced permitting, microtargeted interventions, advanced CBAs, emission caps, permit caps, investment stacking, increased workforce development and opportunity structures, and more tracking, accountability, and transparency (scorecards, dollar for dollar tracking, ROI for distributional justice/reparative justice), etc be included in each strategic plan with some sort of advisory council similar to the Prince Georges' County EJ Commission or the Maryland Commission on Environmental Justice and Sustainable Communities.

Last point, I do not believe the current US EPA will be helpful with the enforcement of the 2016 Title VI complaint agreement. I suggest engaging the AG's office. I know the AG's Office has an equity division. That could be a good place to start. Neither the current US EPA or DOJ are friendly to the EJ Movement.

Please again engage with MAJC-Maryland leaders and collaborators about your concerns on MDEnviroScreen. I think they would appreciate your input on the tool and also your feedback and guidance to help strengthen the next version of the CHERISH Act.

Please let me know if you need any additional information.

Thanks and take care!

Sacoby Wilson, PhD, MS  
2022 Sierra Club Robert Bullard Environmental Justice Award Recipient  
Professor and Director, T.H.E. EJ Lab  
Global, Environmental, and Occupational Health (GEOH)  
School of Public Health  
University of Maryland-College Park  
Phone Number: 301-405-3136  
Email address: [swilson2@umd.edu](mailto:swilson2@umd.edu)

"the people's money should be used to fund the people's science to implement the people's solutions"

"Socrates said the unexamined life is not worth living, I say the unapplied life is worth even less!"

On Mon, Aug 25, 2025 at 12:51 PM BTB ECCB <[btb.eccb@gmail.com](mailto:btb.eccb@gmail.com)> wrote:

## Brandywine/TB, Southern Region Neighborhood Coalition

Dear Secretary McIlwain and Deputy Secretary Ortiz,

Please treat this as **formal notice**. Attached is our detailed letter regarding Maryland's downgrade of Brandywine's EJ score to **63/100** and related rollbacks.

### In brief:

- **Methodology, not cleanup:** The lower score results from **removing race, language, and age** from MDEnviroScreen.
- **Federal baseline unchanged:** EPA EJSCREEN still ranks Brandywine ~97th percentile nationally.
- **On-the-ground facts:** MDE's Dec 2024 inspection at Holcim MAR (Gas Light III, SE-22007) found stockpiles, a water truck, and unregistered activity—**with no public notice or community input—yet operations continue.**
- **Title VI backslide:** HSB 937 undercuts COMAR 20.79.01.04 & .05 (public participation/EJ screening) that were put in place after our 2016 Title VI settlement.
- **Systemic inequities + health:** Brandywine is a **majority-Black, low-income** community with documented **asthma**,

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## EXHIBIT B -3

Gmail - Re: Subject: Brandywine's EJ Score Drop: Manipulation, ... <https://mail.google.com/mail/u/3/?ik=4f611dec3f&view=pt&search...>

**respiratory, and cardiovascular burdens;** new pressures (e.g., **CR-80**) increase cumulative harm.

This is not about partisanship or personalities; it is about **civil rights, health, and law**. Our participation was **mandated** by the 2016 Title VI settlement—not granted as a favor. We will not sit at another **“empty table.”**

**Immediate actions we expect (full remedies in the letter):**

1. Publish the record/rationale for dropping race, language, age from MDEnviroScreen.
2. Commission an **independent audit** (with community representation) against EPA EJSCREEN; **suspend use of 63/100 in permitting** pending results.
3. **Pause new/expanded permits in Brandywine**, including **Holcim MAR (SE-22007)**, until a **cumulative impact review** and public hearings occur.
4. **Reinstate/enforce Title VI protections** in COMAR—no exemptions as a workaround.
5. Establish a **Brandywine EJ Advisory Board** with review/oversight authority and quarterly reporting from MDE.

We also ask plainly: **does this rollback carry the sanction of EJ leaders who stood at the EJ Executive Order signing—Vernice Travis-Miller and Dr. Sacoby Wilson?** If so, it signals policy driven by political convenience rather than science and justice.

Absent prompt corrective action, we will escalate to **EPA OCR, DOJ Civil Rights/Environmental Justice, and DOT OCR** for a full review of Maryland's compliance with **Title VI** and the **2016 settlement**.

Respectfully submitted,

On behalf of Brandywine/TB Southern Region Neighborhood Coalition (BTB Coalition),

Kamita Gray, President

The Directorial Chair, ECCB – Executive Community Citizen's Board Neighborhood Leadership Council (NLC), In Solidarity with:

- Brandywine / TB Southern Neighborhood Region Residents
- The Executive Community Citizen's Board (ECCB)
- Concerned Citizens across Prince George's County

**CC (titles for durability):**

Chair, White House CEQ • Director, White House DPC • Director, White House OPE • Administrator, EPA • Regional Administrator, EPA Region 3 • Assistant Attorney General, DOJ Civil Rights Division • Director, DOJ Environmental Justice Office • Director, DOT Office of Civil Rights • Director, OMB Natural Resources & Environment Branch • Attorney General, State of Maryland • Maryland Commission on Civil Rights • Office of the People's Counsel • Del. Mary Lehman • Sen. Michael Jackson • Chairs, MD House E&T and Senate EEE • Chair, PG County Council • PG County Health Director • Chair, M-NCPPC Planning Board • NAACP ECJ • Earthjustice • Sierra Club–MD • Environmental Integrity Project • Friends of the Earth • CEED • BTB Coalition partners

**Attachment:** 22AUG25\_EJScreenLtr(FiNa).pdf

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## EXHIBIT B — NARRATIVE – SEPTEMBER 8, 2025, WRITTEN RECORD

The **September 8, 2025, written response** is significant not merely because of what it said, but because it placed the rollback rationale into the official advocacy and policy record and circulated that rationale to **BTB, MDE leadership, legislators, and other public actors**. In that contemporaneous written communication, **Dr. Sacoby Wilson expressly acknowledged that the removal of race and language from MDEnviroScreen was undertaken to comply with Trump-era anti-DEI and environmental justice directives, and he further admitted that this change reduced the EJ score for Brandywine and other communities**. That written record matters because it confirms that the score reduction was understood at the time to be the product of **methodological rollback**, not a real-world reduction in cumulative burden.

The record also matters for a second reason: rather than restoring direct frontline authority to the affected community, the response redirected BTB to engage through intermediary organizations and collaborators. In that respect, the September 8 email reflects not only a documented rollback in methodology, but also a governance problem. **It was not an invitation to direct community governance; it was a redirection into an intermediary-controlled ecosystem**. The directly impacted community was routed into affiliated networks instead of being treated as the primary rights-holder in correcting the harm.

This record is especially important because Maryland was simultaneously moving toward deeper reliance on **MDEnviroScreen** in policy and legislative structures, including the **CHERISH Act / CPCN framework**. Under that framework, the Maryland EJ Tool and EJ Score would not function as a side reference; they would operate inside the statutory architecture for identifying **at-risk census tracts**, triggering a **BURDEN report**, and shaping **Public Service Commission review** of certain generating-station applications. In that setting, a score reduction caused by the removal of key vulnerability factors is not a harmless technical adjustment. It can alter which communities are recognized, how burdens are characterized, and how strong the legal trigger for scrutiny becomes.

Put plainly, **when CHERISH uses MDEnviroScreen as a trigger, a weakened score becomes a weakened protection**. Once a weakened score is embedded into statutory screening and burden analysis, the rollback does not remain confined to a map. It is translated into **law, procedure, and protection levels**. That is why the General Assembly cannot treat the MDEnviroScreen rollback as a past mapping dispute. **Once tied to CHERISH, it becomes a live statutory-integrity issue**. For that reason, the September 8, 2025, email is a critical part of the record: it documents that the weakening of MDEnviroScreen was known, acknowledged, and circulated before that weakened methodology was positioned for deeper operational use.

For that reason, the September 8, 2025, email is a critical part of the record: it documents that the weakening of MDEnviroScreen was known, acknowledged, and circulated before that weakened methodology was positioned for deeper operational use the realities are:

- 1.) **When CHERISH uses MDEnviroScreen as a trigger, a weakened score becomes a weakened protection.**
- 2.) **That is why the General Assembly cannot treat the MDEnviroScreen rollback as a past mapping dispute; once tied to CHERISH, it becomes a live statutory integrity issue.**
- 3.) **This email was not an invitation to direct community governance; it was a redirection into an intermediary-controlled ecosystem not affected leadership or residents at the table.**