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

February 19, 2025

Federal Register notice at Docket ID No. EPA-HQ-OLEM-2024-0360 on www.regulations.gov

The Alliance of Nurses for Healthy Environments (ANHE) appreciates the opportunity to comment on the EPA's Interim Framework for Advancing Consideration of Cumulative Impacts.

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 framework[1] makes regulating over 80,000 chemicals possible, and can potentially reduce disparities[2] 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 cumulative impacts.[4, 5,6,7] However, many chemicals which have long been known to be dangerous such as

[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]
[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

lead, ethylene oxide and vinyl chloride remain in use harming our patients, communities and workers across the nation.

We urge EPA to use its existing authority to address cumulative impacts and risks. EPA has been voicing its intention to consider cumulative impacts and risk for nearly 30 years but this effort, lasting several administrations, has been characterized by repeated expressions of urgent need, followed by limited or no action. There is urgency in addressing the cumulative impacts experienced by overburdened communities, and EPA's approach does not provide adequate health or environmental protection.

Actions to reduce pollution and improve environmental quality in the U.S. since 1970 have generated significant health benefits for residents of the United States including reductions in deaths and rates of disease. However, not everyone has seen improvements in health and environmental quality and some communities face more and worse harms than they did 50 years ago. There are areas and communities that have been left behind and this needs to be addressed.

The Interim Framework explains how EPA can draw on its resources and knowledge, as well as engage with groups and individuals in highly impacted communities and areas. To consider such steps is an important advance for EPA, bringing it closer to the current state of the science in the field of environmental health and addressing long-standing concerns from communities with excess burdens.

It is a well-documented fact that many communities are exposed to multiple chemicals and hazards from different sources of toxic pollution, exposed to the same chemical from multiple sources, and additionally exposed through consumer products and building materials. Yet most EPA rules, policies, and practices fail to account for this reality. Permits are not properly limited, conditioned or denied to reflect additions of pollution from surrounding sources. Rules under the Toxic Substance Control Act (TSCA) do not properly consider harm to 'potentially exposed or susceptible sub-populations'. The lead National Ambient Air Quality Standard does not include consideration for atmospheric deposition of lead and subsequent ingestion pathways. Multiple governmental agencies do not act efficiently in a whole-of-government approach to address all impacts and exposures, and rather implement programs in disconnected siloes.

Assessments must be rooted in the lived experience of communities and reflect historical findings and real-life exposures. Community validation methods should be

undertaken in partnership with disproportionately impacted communities. The analyses should also include chemical and non-chemical stressors, public health, environmental and sociodemographic factors.

We know that environmental factors, including government policy choices, contribute to health disparities. We strongly urge EPA to continue its work to assess and reduce Cumulative Impacts to improve the lives and health of disproportionately impacted communities throughout our country.

Sincerely,

Katie Huffling, DNP, RN, CNM, FAAN
Executive Director, Alliance of Nurses for Healthy Environments
katie@enviRN.org