

Citizens Advisory Committee
Environmental Justice Advisory Board
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Alice Lu Testimony Re: Cumulative Impacts on Communities

Hello, I'm Alice Lu, the policy analyst for Clean Air Council. Clean Air Council is a member-supported environmental organization serving Pennsylvania and the surrounding regions. The Council is dedicated to protecting everyone's right to a healthy environment. Thank you for the opportunity to provide public comment today.

Cumulative impacts must be a key consideration in the permitting process for new facilities, especially those that seek to break ground in already-burdened communities. Cumulative impacts account for the totality of environmental and social stressors that people experience and describe how these stressors can build off each other to seriously harm human health and wellbeing.

For many Pennsylvanians, compounding environmental and social burdens are a reality and a result of ongoing environmental injustice. In my work at Clean Air Council, I organize with advocates, researchers, and residents in Chester and Marcus Hook to educate on cumulative impacts and advance state-level protections to require its consideration. Within just 20 square miles of southeastern Delaware County, there are at least 11 major polluting facilities, including oil refineries, petrochemical plants, and the largest trash incinerator in the United States. The pollution from these facilities adds up. They should not be viewed as individual sources of pollution, but as a system of pollution sources that harms the people who call that neighborhood home.

Last summer, my colleagues, in collaboration with community co-investigators from Marcus Hook Area Neighbors for Public Health and researchers at Johns Hopkins University, published a community and environmental health study of southeastern Delaware County.¹ The study aimed to document community strengths and stressors with respect to the environmental and social burdens that residents carry. Nearly 90% of participants reported feeling very concerned about pollution in their communities, with noxious odors being the primary environmental concern for nearly all respondents. The reported environmental stressors worsened respondents' physical symptoms and discomfort, and also took a toll on their mental health.

More recently, research by Dr. Lauren Minsky from Haverford College has documented the real, increased incidences of cancers in southern Delaware County. Dr. Minsky's *People's Cancer Incidence Screening Tool* calculates community elevations in cancer incidence and confirms what residents already

¹ Assessing Strengths, Stressors and Environmental Justice in SoutheaStern (ASSESS) Pennsylvania Community and Environmental Health Study Summary Report
<https://drive.google.com/file/d/1ZINtMknMJf9Af7VdbZo3IWKzYFGZOZw0/view>

know to be true: rates of various cancers in the region are consistently higher than county, state, and national averages.² These numbers are not just statistics; they represent families, friends, and neighbors.

Under the Pennsylvania constitution, all Pennsylvanians have a right to clean air and pure water. There is legislation—House Bill 109—that, if passed, would take the first step in requiring the Department of Environmental Protection to consider cumulative impacts in permitting. I urge the DEP to support this legislation. It is time that we start looking at the bigger picture of existing exposures and stop adding to the pollution of already-burdened communities.

² The People's Cancer Incidence Screening Tool (PCIST)
<https://pcist.net/wp-content/uploads/2025/08/CCIR-SE-Delco-Region.pdf> and <https://pcist.net/>