

Vermont Agency of Natural Resources

Office of the Secretary

1 National Life Drive, Davis 2

Montpelier, VT 05620-3901

[Phone] 802-828-1294

Agency of Natural Resources Environmental Justice and Title VI Complaint Report March 15, 2024

The Agency of Natural Resources (ANR) is pleased to provide the Environmental Justice Advisory Council with the following report summarizing complaints alleging Environmental Justice issues or Title VI violations and any agency action taken to resolve the complaints, as required pursuant to 3 V.S.A. § 6004(d).

Overview of ANR's Complaint Reporting Process

[ANR's website](#) and [Notice of Nondiscrimination](#) (which is posted online and available in various formats, such as on a poster) directs the public to send any questions, comments, or complaints related to civil rights, environmental justice, or diversity, equity and inclusion, to ANR's Director of Civil Rights and Environmental Justice, Karla Raimundí, at anr.civilrights@vermont.gov or (802) 636-7827.

In addition to these public notices, ANR established an organizational structure led by ANR's Civil Rights and Environmental Justice Unit (CR-EJ Unit) and created a new network of staff "liaisons" embedded within the Agency to support the implementation of civil rights and environmental justice across the Agency.

In March 2022 and 2023, the ANR Secretary released two internal memos aimed at ensuring compliance with civil rights and coordinating the implementation of environmental justice by reorganizing internal structures and functions across the Agency. The goals of these changes were to (1) promote more consistent compliance, (2) generate efficiencies through the sharing of best practices, tools, and protocols, and (3) increase capacity through staff support from the CR-EJ Unit. The Secretary also created two new networks—one for civil rights and one for environmental justice—to support the development and implementation of civil rights and environmental justice efforts across the Agency.

The CR-EJ Unit is composed of the Director of Civil Rights and Environmental Justice and the two Environmental Justice Coordinators. The Unit provides support in the implementation of civil rights and environmental justice principles and Vermont's EJ Law Act 154 as well as provides guidance on the Agency's community engagement efforts and assists with program review processes.

Civil Rights Liaisons. The Civil Rights Liaison network is comprised of at least two staff from each ANR department and at least one staff from the Secretary's Office. The largest department in the Agency, the Department of Environmental Conservation (DEC), has

designated one staff person for each division to ensure effective communication of information and implementation of compliance priorities. Civil Rights Liaisons are the first point of contact for Department staff to field internal and external questions and can identify and communicate any issues to the CR-EJ Unit. They also coordinate implementation of Department-specific procedures to ensure compliance with civil rights laws and regulations.

Environmental Justice Liaisons. The Environmental Justice Liaison network mirrors the structure and responsibilities of the Civil Rights Liaison network. Each Department has at least two Environmental Justice Liaisons. The EJ Liaisons are the first point of contact for Department staff to field internal and external questions. They also coordinate implementation of Department-specific procedures to implement Act 154 and other environmental justice requirements.

Over the past year, ANR has been focused on setting up these foundational internal structures to provide support to staff in the implementation of environmental justice work.

Title VI Complaints

- The [ANR Civil Rights and Nondiscrimination Grievance Procedure](#) (Grievance Procedure) is posted online, and directs the public to submit civil rights complaints to ANR's Nondiscrimination Coordinator, Karla Raimundi. This Grievance Procedure ensures the prompt and fair resolution of complaints from members of the public alleging discrimination in the operation of ANR's programs, services, or activities.
- ANR has not received any civil rights complaints under the Grievance Procedure.

Environmental Justice Complaints

ANR does not currently have a formal environmental justice grievance or complaint intake and review process. ANR will create a formal environmental justice complaint intake and review process and tracking system in calendar year 2024.

In the absence of a formal EJ complaint process, ANR is sharing a summary of an environmental justice concern and resolution that was shared at a joint meeting of the EJ Advisory Council and the Interagency Committee (July 18, 2023).

A member of the public raised concern by email to ANR and at the joint meeting relating to whether a contract for infrastructure in manufactured housing communities must be secured by a performance bond. The DEC responded to the individual with information about the entities with whom DEC consulted about setting the minimum contract value at which a performance bond is required and the basis for the threshold, aimed at minimizing the risk of an incomplete project that may negatively impact an individual or community. DEC reached out to the individual again several months later to invite any additional input on this topic.