



August 14, 2026

Interagency Committee Response to Comments on the 2026 Civil Rights and Environmental Justice Complaint Summary Reports

Introduction

On May 15, 2026, members of the Environmental Justice Advisory Council (AC) submitted recommendations regarding the 2026 annual Civil Rights and Environmental Justice Complaint Summary Reports. The Interagency Committee (IAC) has carefully reviewed these recommendations. We appreciate AC members' thoughtful review of the reports and the recommendations they've made to strengthen the Vermont Environmental Justice complaint response framework.

We are submitting this letter as a unified response to AC members' recommendations. This letter reflects the collective perspective of the covered agencies. It identifies areas of agreement, ongoing implementation efforts, and opportunities for continued collaboration. The IAC is committed to AC members' recommendation for a unified environmental justice complaint system. In particular, we are committed to developing a coordinated and practical system for receiving, evaluating, and responding to environmental justice complaints.

We recognize that AC members' recommendations shared in May of 2026 need more discussion. This would be helpful to better understand the intention and desired outcomes of these recommendations. We hope that these discussions can help inform the implementation of an environmental justice complaint intake system. We need capacity, expertise, and collaboration to bring this complaint system to fruition. We are looking forward to continuing to partner with the AC on this work.

What is an Environmental Justice Complaint?

On May 7, 2026, the Civil Rights and Environmental Justice Unit hosted optional office hours for the AC. During this time, the following AC members began working on the AC's 2026 recommendations.

- Rich Holschuh,
- Matt Lawless, and



- Mariana Sears

During the office hours, these AC members discussed the distinction between civil rights complaints and environmental justice complaints. They also identified the importance of developing a shared environmental justice complaint framework. They then developed a definition of “environmental justice complaint” as one of their recommendations. We see a definition as key to the creation of a central environmental justice complaint intake system.

The IAC recognizes that the draft definition is the work of three AC members, not the collective body. It is important that the full AC considers and proposes a draft definition to ensure that it is representative. We are looking forward to the full AC taking action to consider and propose a definition for the IAC’s consideration.

We have begun discussing components of a draft definition. During a [public meeting on July 28, 2026](#), we discussed several potential components of this definition and how they could translate into features of an environmental justice complaint intake system. For example, we discussed:

- The importance of designing an intake system that collects information to help us identify:
 - the impacted community, including populations that may face barriers to accessing the complaint process;
 - the environmental burden or benefit at issue;
 - the relationship between the complaint and applicable agency authorities; and
 - any language or disability access needs, including those of individuals who speak languages other than English, New Americans, and individuals with disabilities.
- The importance of creating a simple and transparent system for complainants to navigate.

The considerations above show how the definition of environmental justice complaint can influence system design.

In their response, AC members raised concerns about the human-centered (anthropocentric) nature of the Environmental Justice Law. The IAC is interested in understanding this concern further. We would welcome a joint conversation between the



IAC and AC to explore this issue and how it should inform the complaint intake system and the law more broadly.

Unified Environmental Justice Central Intake System

To help create an environmental justice complaint intake system, the IAC has put together a task group. The Central Intake System Task Group will propose a single environmental justice complaint intake system for all the covered agencies.

This task group will take on developing recommendations for how to intake, screen, evaluate, refer, coordinate, track, and report environmental justice complaints across all covered agencies. This work will need a continuous improvement mindset. We may not get it perfect the first time, so we need to be prepared to improve as we go along.

Consistent with the workplan developed by the IAC, the task group will:

- research issues,
- develop recommendations,
- engage key partners, and
- present findings to the IAC for consideration.

We will also rely on the task group to identify:

- operational and budget needs for this work,
- governance considerations,
- technology needs, and
- opportunities to standardize environmental justice complaint processes across the agencies while still allowing them to comply with their unique requirements.

Task group members currently include IAC members:

- Amy Redman from the Vermont Department of Health,
- Jeffrey Mbarushimana from the Office of Racial Equity, and
- Karla Raimundi from the Agency of Natural Resources.

Environmental Justice Coordinators Kim Barrett and Juliet Birch will support this group. We hope that this membership brings expertise that will encapsulate the collective perspectives of the covered agencies. We welcome and encourage any interested AC members to join this group. Getting participation from both AC and IAC members will strengthen the development of the environmental justice complaint intake system.



Next Steps

We appreciate the AC members' recommendations. They play an important role in advancing the Vermont Environmental Justice Law.

We are looking forward to collaborating with the AC further through the Central Intake System Task Group, with the goal of developing initial recommendations by the end of the first quarter of 2027. Through this continued conversation and sharing of ideas, we will create a complaint response framework that provides meaningful access for the public, supports consistent implementation across agencies, and advances the goals of the Vermont Environmental Justice Law.

Thank you,

Interagency Environmental Justice Committee



This letter was developed by the Interagency Environmental Justice Committee for the Environmental Justice Advisory Council. The Agency of Natural Resources is responsible for coordinating the implementation of the Vermont Environmental Justice Law and related public materials.

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