



1 National Life Drive, Davis 2, Montpelier, VT 05620-3901
(802) 828-1294 | <https://anr.vermont.gov>

Environmental Justice and Title VI Complaint Report

Agency of Natural Resources

Pursuant to the Vermont Environmental Justice Law

March 13, 2026

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ወንጀል ለማግኘት፡ | ADEEGYO LUUQADA AH OO BILAASH AH | خدمات لغة مجانية:
anr.civilrights@vermont.gov or 802-636-7827.

Introduction

The Agency of Natural Resources (ANR) is pleased to provide the Environmental Justice Advisory Council (AC) with the following report summarizing complaints alleging Environmental Justice issues or Title VI violations in the year 2025, and any agency action taken to resolve such complaints, as required pursuant to 3 V.S.A. § 6004(d).

This report provides an update on ANR's Title VI complaint reporting process, summarizes any Title VI complaints received during the reporting period, and describes the agency's contributions to organizing efforts to develop a centralized intake system for environmental justice complaints across the covered agencies. While this work continues, ANR currently responds to environmental justice concerns through its internal Environmental Justice Network, an inter-departmental program staff group that helps coordinate the agency's environmental justice work. The Environmental Justice Network supports information sharing across ANR divisions, helps identify appropriate program staff to respond to community concerns, and assists in coordinating agency engagement with communities experiencing environmental justice impacts.

I. Updates to ANR's Title VI Complaint Reporting Process

Since the completion of ANR's last report in March 2025, ANR has continued to maintain its civil rights complaint reporting process and has continued to receive and consider feedback regarding the accessibility of its complaint materials.

In addition, ANR is currently working to finalize its Grievance Procedure Implementation Manual through the Civil Rights Working Group. This manual is intended to provide additional clarity and guidance regarding the implementation of ANR's grievance procedures and to support consistent application of the agency's civil rights complaint process.

II. Title VI Complaints

ANR did not receive any Title VI complaints in 2025.

III. Environmental Justice Complaints

ANR does not currently have a formal environmental justice grievance or complaint intake and review process. The agency continues to work toward the development of a process through which environmental justice complaints can be received, reviewed, and addressed.

In response to the Environmental Justice Advisory Council's 2024 recommendation that the covered agencies under the Vermont Environmental Justice Law (Act 154 of 2022) develop a uniform interagency complaint intake and review process, ANR collaborated with the Public Utility Commission to develop a workplan to guide the development of such a process for covered agencies. The workplan has since been reviewed and approved by the participating agencies.

To supplement this workplan, ANR developed a proposed implementation timeline that was reviewed by members of the Interagency Committee on Environmental Justice. The workplan was reviewed in a public meeting of the Interagency Committee on January 27, 2026.

In the absence of a formal process, environmental justice complaints and concerns may be directed to the ANR Director of Civil Rights and Environmental Justice at:

ANR.CivilRights@vermont.gov

ANR did not receive any environmental justice complaints or concerns in 2025.

IV. Question for Consideration by the Environmental Justice Advisory Council

ANR respectfully requests guidance from the Environmental Justice Advisory Council regarding the substantive elements that should define an environmental justice

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complaint, including how such complaints may be distinguished from broader environmental justice concerns.

This question has previously been identified as an area for Council consideration in:

- the ANR Recommendations Document (March 2024), and
- ANR's individual response to the Advisory Council's 2024 recommendations (August 2024).

These documents are hereby incorporated by reference, as this remains an important area where guidance from the Advisory Council would assist the covered agencies in implementing a consistent and effective approach.

The substance of a civil rights complaint is clearly defined under federal law, and procedures for the intake, review, and investigation of civil rights complaints are grounded in federal regulatory requirements. Under these requirements, the federal government provides limited discretion to state agencies regarding how such complaints must be processed and resolved.

By contrast, the substantive definition of an environmental justice complaint has not yet been formally established, either in statute or through administrative guidance. As agencies work toward developing an interagency environmental justice complaint intake and review process, clarity regarding the defining elements of an environmental justice complaint will be critical.

In particular, guidance from the AC would assist agencies in identifying:

- the criteria or threshold that distinguishes an environmental justice complaint from a general environmental justice concern,
- the types of agency actions or decisions that may appropriately be reviewed through an environmental justice complaint process, and
- whether the environmental justice complaint process should focus on systemic or policy-related issues affecting environmental justice focus populations, rather than individual disputes more appropriately addressed through existing regulatory or civil rights processes.

Clarification on these issues would support the development of a clear, accessible, and appropriately scoped interagency complaint process, while also ensuring that



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environmental justice concerns raised by members of the public are addressed through the most appropriate mechanisms available.