

Connecting People to Power

Community Engagement Pilot

Report & Planning Recommendations to the Vermont Department of Environmental Conservation



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EJ Public Resources Folder

Cover image by Fransine Nigena from her [Photovoice contest](#) submission.

Report Summary

"There is no power for change greater than a community discovering what it cares about."
- Margaret Wheatley

The work of this contract began in summer of 2021. In response to the Request for Proposals posted by the Vermont Department of Environmental Conservation (DEC), members of Rural Environmental Justice Informed by Community Expertise (REJOICE) coalition from Center for Whole Communities (CWC) and the Vermont Law School Environmental Justice Clinic (VLS EJ Clinic) partnered with Rights and Democracy Institute (RDI) to propose a process to research and develop recommendations and guidance to support DEC in the development of their EJ Community Engagement planning work. We designed an initiative that included research on nationwide public participation and the implementation of a pilot project to put into practice different engagement methodology and tools for public participation and community engagement. The approach allowed us to draw from national best practices, while centering and uplifting community experiences, and testing these methodologies with communities across Vermont.

This report is organized into two main sections. The first half of the report shares our approach and community voices, stories, and findings from the **Pilot Community Engagement Projects** in Bennington, the Northeast Kingdom (NEK), Burlington and Winooski. We have situated the community learning first and foremost to reinforce the importance of rooting any planning and policymaking in the experiences of those who will be impacted by our decisions. We believe community involvement is the foundation of good policy development and implementation.

The second primary section of the report is **Guidance and Recommendations** structured to align with the EPA Recommendations for developing Public Involvement Plans (PIP). This section includes both national best practice recommendations, and Vermont-specific context and recommendations. We hope that this will provide programs across the DEC with a framework to engage in the work ahead to build the capacity of the DEC to center community voice and experience alongside addressing environmental harms.



Community tour as part of the Bennington outreach

Acknowledgements

We are deeply grateful for the brilliance, time and energy that so many have contributed to this project:

- ⇒ First and foremost, **community members** from Bennington’s Willowbrook and Orchard Village (Applegate) neighborhoods; young adults from the Burlington/Winooski BIPOC community; and residents of the Newport area and across the NEK
- ⇒ **Project team members from CWC, RDI, and VLS EJ Clinic:** Jennifer Byrne, Dan Fingas, Grace Gershuny, DeShawn Hamlet, Riziki Kassim, Ruthie Lazenby, Susannah McCandless, Ginny McGinn, Kiah Morris, Alison Nihart, Anushka Saraswat, Cora Smith, Kirthana Vallesi, Britaney Watson, and Michael Weiss
- ⇒ **Partners and collaborators:** REJOICE Coalition members Hayley Jones, Sandrine Kibuey, Ingrid Nelson, Bindu Panikkar; Michael Fernandez with Bennington Natural Resource Conservation District; Laura Gans with Vermont Legal Aid; and staff members from ACT Bennington, Champlain Valley Office of Economic Opportunity (CVOEO), Don’t Undermine Memphremagog’s Purity (DUMP), Northeast Kingdom Organizing (NEKO), and Peace and Justice Center
- ⇒ **DEC project leads:** Carey Hengstenberg, Joanna Pallito
- ⇒ **DEC EJ Team**, including Catie Bartone, Jamie Bates, Anne Bijur, Lindsay Carey, Megan Cousino, Katelyn Ellerman, Pete Kopsco, Dan Mason, Adam Miller, Ellen Parr Doering, Mary Perchlik, Cori Rockefeller, and Chris Rottler
- ⇒ **Staff from across the Agency of Natural Resources (ANR)**, including Kimberly Greenwood, Maggie Gendron, Karla Raimundi, and former DEC Commissioner Peter Walke

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Pilot Project Implementation

One of our top priorities in community engagement was to build trust and rapport. We know it takes vulnerability to share stories, and it was our responsibility to create conditions where community members feel safe enough to share their experiences. Our timeline reflected our intent to build trust through the community engagement occurring in three phases: design/discovery, community ground-truthing, and review and response.

Design/discovery phase: Our team reviewed existing data, conducted agency and community knowledge-holder interviews, researched communities, and created a plan informed by what we learned. Then we shared our plan with knowledge-holders and liaisons in each community for their review and suggestions.

October 2021–May 2022

- Iterative outreach design & planning
- 1:1 meetings with community leaders
- Consultation with existing partners



Community ground truthing phase: Our team engaged with the selected communities.

July 2022

- Community meeting #1: Listen & Inform
- Photovoice challenge
- Neighborhood walk
- Community mapping



June 2022

- Canvassing
- 1:1 meetings with community leaders
- Broad outreach
- Connect with conservation districts, planning commissions

August 2022

- Community meeting #2: Explore Desired Change
- Photovoice challenge
- Neighborhood walk
- Community mapping



September 2022

- Community meeting #3: Continue to Explore Desired Change
- Offer & connect resources
- Focus on commenting, rulemaking, complaint process, drinking water, housing



October – November 2022

- Report back to communities
- Test learning with participants
- Follow up with service providers

Review and response phase, September 2022-January 2023: Our team gathered, synthesized, and tested what we learned with community participants and liaisons, agency staff and partners.

Environmental Justice Community Engagement (EJ CE)

Team members and roles*

Project Partner Organizations:

Center for Whole Communities (CWC)

Center for Whole Communities works with organizations and initiatives in Vermont and across the country to cultivate transformative leadership that weaves together and strengthens movements for justice and the environment. www.wholecommunities.org



Rights and Democracy Institute (RDI)

The Rights & Democracy Institute (RDI) was founded in 2016 to advance human rights and strengthen our democracy through grassroots organizing, transformative policy, and supporting the development of a new generation of leaders from rural communities across Vermont and New Hampshire. www.rights-democracy.org



Environmental Justice Clinic at Vermont Law School (VLS-EJC)

The VLS Environmental Justice Clinic strives to further the environmental justice movement by representing and partnering with environmentally overburdened communities of color and low-income communities. Clinic Fellows and student clinicians participated in the Rural Environmental Justice Opportunities Informed by Community Expertise (REJOICE) project, which conducted outreach to communities and stakeholders throughout Vermont in order to recommend environmental justice policy to the state. <https://www.vermontlaw.edu/academics/clinics-and-externships/environmental-justice-clinic>



Environmental Justice Community Engagement Team

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Grace Gershuny, Northeast Kingdom Community Liaison

DeShawn Hamlet, Bennington Community Liaison

Riziki Kassim, Burlington-Winooski Community Liaison

Susannah McCandless, Special Projects Manager, CWC; Project Administration, Design & Engagement Support

Ginny McGinn, Executive Director, CWC; Project Strategy & Oversight

Kiah Morris, Executive Director, RAD; Project Strategy

Britaney Watson, Environmental Justice Community Engagement & Network Coordinator, CWC & RDI; Project Design & Coordination

Michael Weiss, Environmental Justice Organizer, RDI

** Please see Appendix 2: Project Team for more details on the participating organizations, key personnel, and their roles.*

Engagement practices

We strove to uphold adrienne marie brown's principles of Emergent Strategy¹ and the [Jemez Principles for Democratic Organizing](#)² in each community. We worked with liaisons and trusted community-based organizations (CBO's) to determine event format and location. We offered participant compensation, childcare upon request, food, and times that were accessible, then checked residents' impressions of how arrangements worked, both with event participants and in subsequent rounds of outreach. We also provided multiple compensation options for participating community members including cash, checks, CashApp, Venmo, Zelle, and PayPal (see Appendix - Participant Compensation Framework).

Engagement tools

Our team consulted with Dr. Bindu Panikkar and Dr. Ingrid Nelson, REJOICE members and scholars who work on environmental justice (EJ), community engagement, and environmental social science at the University of Vermont Rubenstein School and Department of Geography. We agreed on the importance of being creative, collecting data in a way that is both engaging and inspiring, and creates knowledge together with communities. This approach meant our team avoided falling back on traditional data collection methods such as surveys and questionnaires. We recognized that where interviews and engagement take place matters, and thought strategically about the location and sequencing of engagement methods. **We asked ourselves, what knowledge do we already have, what do we need, who does it belong to, and with whom will we share it?** Together we created a list of potential methods to be used to engage communities and worked to frame questions in ways that were empowering to community participants.

The community engagement methods we used centered on fostering a process of conversation and story-building. Our goals were to build trust and momentum toward more accessible, just, meaningful, and inclusive participation in the decisions and actions of State government agencies. The methods included neighborhood canvassing, neighborhood walking open interview, neighborhood mapping, neighborhood network diagramming, photovoice contests, coffee hour, and open-ended questions in focus group or community sessions. (See Appendix - Methodology, for descriptions of each method, and a table showing which approaches the team used in each selected community).

Community Selection

Our community selection process was informed by the following sources of information: [Vermont Social Vulnerability Index](#)³, the [EPA's EJ Screen Tool](#)⁴, and [Vermont Environmental Disparity Index](#)⁵. In addition, we drew on previous research and engagement efforts by REJOICE coalition members. Based on the tools, research, and previous work and experience, we initially selected mobile home park elderly residents in the NEK, New American young adults in Winooski/Burlington, and Black, Indigenous, and People of Color (BIPOC) community members in Bennington. Responding to 1:1 conversations with community leaders, we expanded our focus to include residents of low-income housing communities in Bennington; older Vermonters (also known as elderly), mobile home residents, and those with a concern about the health of their communities and environments in the NEK; and BIPOC young adults in Burlington and Winooski.

Communities Engaged

The Northeast Kingdom (NEK) is Vermont's most rural and natural-resource dependent region. It also has some of the state's lowest median incomes and is the site of Vermont's only currently active landfill, in Coventry. Access to services, including health care, social services, public transportation, internet, and food programs, can be difficult. The median age in this region is higher than Vermont's relatively high average. According to the 2020 Census data, some 22% of the NEK's population was aged 65 or older, and projections suggest that this age demographic will continue to grow. We engaged primarily in the Newport area, though outreach and events occasionally included the broader region. Some NEK residents are engaged in ongoing struggles for clean water stemming from pollution associated with the Coventry Landfill.



Road and farm in the Northeast Kingdom

Bennington, like the NEK, continues to suffer from challenges related to poverty, hardship from industries leaving the area, and understaffed government services. Bennington also faces challenges due to high rates of death from opioid and other substance use, water contamination, and inadequate access to health care and desirable food, exacerbated by long distances and limited transportation services. Engagement efforts in Bennington focused on two affordable housing complexes: Willowbrook and Orchard Village. Orchard Village (formerly Applegate) has 106 units that house families, elders, and people with disabilities. Willowbrook is made up of 75 homes inhabited mostly by families. In these communities, residents and institutions faced ongoing gaps and lack of progress despite years of work to increase opportunity and access to services like weatherization, repairs, mortgage and rental assistance, and small business loans and grants. People in Bennington express frustration over inadequate staffing of institutions serving public safety and wellbeing, resulting in lack of responsiveness, or rule-bound responses to residents' needs. Residents continue to work to overcome systemic racism to address undue burdens and unequal access to benefits, including access to healthy, joyful, and dignified work, housing, and information.



Town of Bennington

Burlington and Winooski are home to the largest BIPOC communities in Vermont, including significant populations of immigrants and refugees with primary languages including Arabic, Mai-Mai, Somali, Swahili, Nepali, and Vietnamese. In Burlington and Winooski, 11.8% and 21.5%, respectively, of people surveyed in the US Census American Community Survey from 2015-2019 were listed as 'Foreign Born', while 13.5% and 26%, spoke a language other than English at home. More broadly, Chittenden County also ranked as the youngest county in Vermont, with a median age of 37.4 (US Census 2020) and is more densely populated and urban than most communities in the state.



Burlington bike path

We focused our engagement on BIPOC youth aged 16-29 in an effort to hear voices often marginalized and disconnected from civic processes. Younger individuals can often speak and read English more fluently than their first-generation immigrant elders, and tend to act as cultural interpreters and brokers. They provide language support and facilitate access to all kinds of systems for older generations and family members. Members in these communities have worked to create opportunity and access to resources for years, but often face ongoing structural racism and strong limitations to language access and practical access to government systems at all levels.

More detail about our approach can be found in the [Pilot EJ Community Engagement Plan 2022 for the VT DEC](#) developed December 2021. Our plan was informed by the legal research memo, [Community Engagement Plan Research Memo, prepared by the VLS EJ Clinic team](#) in Fall 2021 (see [EJ Public Resources Folder](#)). Our overall engagement process was informed by team members' previous and ongoing engagements, adrienne marie brown's [Emergent Strategy](#), Rosa Gonzalez's [Spectrum of Community Engagement to Ownership](#)⁶; [CWC's Whole Measures Framework](#); and Kiah Morris's [Guiding Principles for a Just Transition](#)⁷, created in engagement with the Vermont Climate Council. At each site where we engaged, the Environmental Justice Community Engagement and Network Coordinator (Project Coordinator) consulted with two community members or leaders to provide feedback on the community-specific plan.

Participant Numbers and Compensation

The EJ CE team reached over 200 distinct individuals in groups and one-to-one settings. We paid out a total of 305 participant stipends, for participation in meetings and events ranging in size from four to 37 participants, held between October 2021 and November, 2022. In addition, we met one-to-one with over 50 individuals – community leaders, organizational staff, and agency personnel. Please note, this does not add up to 355 unique individuals. We were striving to build relationships across multiple events. Correspondingly, some individuals participated in the full sequence of community meetings and events we offered in a particular engagement location, while others participated in just one.

Table: Community meetings and events, EJ CE team pilot outreach, June-November 2022

	Bennington	Burlington/Winooski	Newport/NEK	Total
Events and meetings held	10	7	5	22
Total participant attendance	174	54	77	305
Age range	Children - elders	Teens, young adults	Adults, elders	
Participant stipends*	\$6,100	\$3,730	\$3,315	\$13,145
Other meeting costs (facility, food, childcare, etc)	\$2,156	\$867	\$256	\$3,279
Total cost of liaisons' time	\$2,850	\$4,305	\$3,915	\$11,070
Total direct outreach costs	\$11,106	\$8,902	\$7,485	\$27,493

*For 1.5-hour meetings, on average; some participant compensation costs covered by RDI Agency of Transportation (AOT) subgrant

Engagement Planning

One-to-one conversations - Planning phase

Outreach began in October 2021 as the Project Coordinator conducted one-to-one conversations with community leaders, community members, organizations, and staff from the DEC. These meetings were designed to build relationships, learn details about each community, receive tips and suggestions on best approaches for engagement, and to identify potential collaborations. The Project Coordinator held 31 conversations and four follow-up conversations, with organizations ranging from Champlain Valley Office of Economic Opportunity (CVOEO), to Northeast Kingdom Community Action, to Bennington Rutland Opportunity Council (BROC) and the Vermont New American Advisory Council. (For a full list of the organizations and groups the team reached out to, see [EJ Public Resources Folder](#)).

Questions for communities

- **What is the most pressing EJ issue in Vermont?**
- **What are your main interests in EJ?**
- **What information would be helpful for us to better address EJ issues?**
- **How would you like to be involved in EJ work?**
- **What types of things could be done to help make this a meaningful process for communities in Vermont?**



Community meeting at O.N.E. Community Center, Burlington, photo by Michael Weiss

To the question, “what is the most pressing EJ issue in Vermont?”, we received the following answers, listed here with bigger font more frequently mentioned:



The themes that arose from the questions often seemed to depend on the interviewee’s motivation for participating in the interview. Community leaders and organizational representatives who provided services and/or efforts to advance EJ responded in alignment with their values, personal experiences, and the ways they wished to advance EJ. Staff from DEC tended to answer based on what their role could accomplish and/or what could support their work. The Project Coordinator observed that DEC staff preferred to provide answers as representatives of the State rather than from the individual’s personal perspective.

Once we began our outreach phase at the three selected sites, we connected with at least two dozen additional community and organizational leaders. We consulted broadly in the NEK, developed close working relationships in Bennington, and made key connections in Burlington and Winooski.



Spectrum of Community Engagement
Created by Rosa Gonzalez, Facilitating Power

Common Themes

Engaging from the interconnected aspects of environment that matter to people's everyday lives

Working across differences to build meaningful participation will require agency personnel to expand their understanding of what the environment means to diverse Vermonters. Environmental justice requires an understanding of the

environment not just as some green places “out there” we might visit and conserve. It is also the spaces where we live, work, eat, play, learn and pray. Our environment is also reflected and recorded in our bodies, through the air we inhale, the food and water we consume, and the chemicals that we absorb.

When community stakeholders were asked about their most pressing environmental issues, participants across all communities consistently emphasized problems with housing and mobility. While neither is technically within the DEC's purview, these issues connect health and environment, and indoor and outdoor—or public and private—space. These issues, and residents and property managers' ability to address them effectively, could be resolved by taking an interagency, interdisciplinary approach that centers community members' most pressing needs and concerns.

For example, participants in all three selected communities reported disproportionate siting of lower-income neighborhoods on or near floodplains and swampy areas, resulting in greater risk of standing surface water from inadequate site drainage. These reports are consistent with the excessive share of mobile homes affected by Hurricane Irene, for example. Connecting outdoor environmental conditions with indoor environmental quality, residents reported that surface water near homes generated higher rates of indoor mold in low-lying areas. Standing surface water also imposed mobility limitations and increased fall risk for elderly and wheelchair-bound community members, especially as standing water turned to ice in winter.

We heard clearly that health, transportation, and access to desirable food operate as a tightly interconnected set of opportunities and challenges. When transportation fails, kids miss school, adults lose jobs, families eat less well, and families are less likely to receive physical and mental health treatment and services. Sometimes, as one Bennington participant pointed out, those failures precipitate state involvement—visits from the Department for Children and Families, or greater reliance on emergency health care—which can be costly both to families and taxpayers. Interpreting that series of connections as EJ issues is consistent with the broadened, holistic understanding of ‘environment’ laid out above. Consistent with an EJ framing, responding to these issues will require an interdisciplinary approach, including coordination, collaboration, and communication within and between agencies and with external organizations.



Country road and farmhouse, NEK

Targeting communication for engagement with diverse constituencies

The EJ CE team tested a wide range of engagement strategies during the pilot projects. Some were highly successful; others struggled or fell flat. A few themes emerged, according to both community participants and members of DEC staff. Currently existing DEC methods of engagement and communication – the [Environmental Notice Bulletin](#) (ENB), the [Rules Portal](#), public comment meetings without interpretation, and notices sent only to adjoining landowners – usually fail to promote meaningful public engagement. Without context-specific outreach and substantial input from those most impacted, resulting actions risk failure in delivering equitable treatment and outcomes.

Consistent with an EJ framing, responding to these issues will require an interdisciplinary approach, including coordination, collaboration, and communication within and between agencies and with external organizations.

For example, residents of low-income housing in Bennington prefer to receive important information delivered to their door, or distributed by housing authority staff to mailboxes, while general information can come from trusted Facebook groups. In contrast, young adult members of the Somali Bantu New American community shared that some elder speakers of Somali and especially of Maay-Maay, a language that is not written, disseminate key information through gender-specific WhatsApp groups.



Working in a field, Burlington, photo by Fransine Nigena

Equitable access to environmental benefits

In keeping with the interconnected character of Vermonter's experience of environmental justice, access to environmental benefits, including green space, is not a given in the communities with whom we worked. It is affected by matters as diverse as access to transportation, residents' sense of safety, how water moves through residential landscapes, and by waste. These connections emerged in front-porch conversations, neighborhood walks, community mapping, and in-person and virtual forums.

A throughline in our conversations with impacted Vermonters is how barriers to accessing environmental benefits, including safe, healthy, and welcoming outdoor space are often layered onto other, social, economic and mobility barriers. Notably, New American elder participants in REJOICE focus groups from early in the pandemic reported neighbors' racialized and xenophobic threats, and calls to police on grandchildren playing just outside their homes. Access to green space is also often limited by transportation. While many participants, especially in Chittenden County, appreciated public transit, families without access to private vehicles reported that bus routes don't necessarily provide ready or timely access to local recreational areas. In Bennington, young families and disabled residents had difficulty accessing Lake Paran, a popular local recreation area. When we asked, "where would you go, if you could go anywhere?", replies included "up to the mountains," and "fishing." Youth participants in Bennington reported having nowhere accessible to swim or hike: several stated they had never hiked and had not gone swimming for many years.

Residents in all communities also often reported that their ability to enjoy and obtain health benefits from the green space nearest their homes—especially critical to children, elders, and others with less independent mobility—was impaired by waste. This included the presence of dog and cat feces and drug paraphernalia and other medical waste in common space and play areas, inadequate or absent residential or recreation waste disposal infrastructure and maintenance, contamination of surface and subsurface waters, and noise and air quality impacts (e.g., waste disposal truck traffic near Coventry Landfill, and emissions from the Burlington-based wood-burning McNeil Generating Station).



Children at a playground with broken equipment and unmaintained green space.

Community–Specific Findings

Bennington

Local Collaborations

We collaborated through the entire outreach process with community liaison DeShawn Hamlet, a local teacher and coach, and Michael Fernandez, Director of the Bennington County Natural Resources Conservation District (NRCD). We also collaborated with ACT Bennington to deliver a youth-focused initial event. We coordinated with Shires Housing and, to a lesser extent, with the Bennington Housing Authority, including to deliver meeting and event announcements. We consulted with the Rutland Area Branch of the NAACP, which serves Bennington; with Good News Garage, BROCC Community Action, and the Bennington Regional Planning Commission.



Sunset over Town of Bennington Vermont
View from Bald Mountain

We engaged with two low-income housing communities in Bennington: Orchard Village, run by non-profit Shires Housing (SH), and Willowbrook, run by the Bennington Housing Authority (BHA). These communities are connected by a walking bridge. They face unique challenges due to the different property ownership and management approaches, yet both are dealing with the overarching issues we can trace back to systemic racial and social inequities that lead to poverty. Two walking tours were conducted in each community, first with the youth and then with adults. We followed the walking tour with a mapping exercise, and community discussions and information sessions.

Community Priorities

The EJ CE Team used door-knocking, neighborhood walking interviews and neighborhood mapping with both youth and adults to gain an initial understanding of Willowbrook and Orchard Village residents' concerns. The team then organized a series of community conversations and training sessions on the identified topics of interest. We also facilitated residents' participation in ANR/DEC decision-making processes. For more detail on these methods, see Appendix 3 - Methodology.

Housing

Participants in the Willowbrook neighborhood reported having poor ventilation, especially in their bathrooms. All participants identified having mold in their homes for more than six months. All participants experienced issues with their plumbing, and had water quality concerns, so much so that most participants reported they do not drink water from the tap.

Participants disclosed issues and distrust with the BHA, including regarding maintenance needs. In the Willowbrook neighborhood, particularly, residents are required by the BHA to report maintenance needs in their home including

lightbulb and other hardware replacements, appliance issues, and structural repairs such as floors. Then, they face long service delays due to understaffing, receive invoices even for minor maintenance repairs, and risk threats of eviction should they not pay, deterring some people from reporting problems. Surveillance cameras are in place, but the BHA has refused to share footage with residents trying to address issues like theft or conduct accusations. “It’s hard to feel comfortable with the housing authority breathing down your neck all the time,” shared one resident.

Participants reported issues with heating and cooling systems. They reported difficulty staying cool in summer, especially in upstairs bedrooms, noting they are charged a monthly fee per air conditioner in their home. All participants informed the EJ CE team of issues with hot water, with most participants reporting being without adequate hot water for months. Others stated that hot water is sporadic and/or that they did not have enough hot water for the entire family in the home to bathe.

Transportation

Participants in the Willowbrook neighborhood identified barriers to accessing better job opportunities due to the limited bus schedule and cited issues transporting middle and high school students to and from school. The community identified having some (though not enough) community members with vehicles willing to assist those without transportation with essential needs such as grocery shopping and transporting children to school. Some also reported having access to state-funded rides to some appointments (though not early morning visits) and being within walking distance to local shops as assets to their location.

No Car, No Sidewalk, No Groceries, No Safety

As the crow flies, Willowbrook and Orchard Village (Applegate) low-income housing neighborhoods appear to be conveniently located close to shops and services. Yet residents are effectively cut off, surrounded by high-speed, multi-lane roads with no sidewalks. One longtime resident described trying to single handedly wrestle a laden cart and stroller the wintry half-mile along the road’s edge, cars whizzing past, until the cart overturned, groceries spilling into the snow and slush.

Neighbors estimate that less than half of residents have access to a car that works. Many residents described walking to the nearest supermarket by crossing an abandoned railway trestle to avoid the highways—then muscling shopping carts back across it. Local buses strictly limit the number of shopping bags each rider and family can bring onboard.

Safety and sense of community

Most residents expressed concern regarding the lack of parental supervision of children in the neighborhood, substance use by members of, and visitors to, the community. Residents feel trapped or stuck in the community by transportation and assistance program structures. While some residents appreciated good neighbors, many reported a lack of sense of community. They had differing opinions about whether that lack stemmed from distrust in housing management or amongst community members.

DEC Areas of Focus

Waste

Participants in Bennington's Willowbrook apartments described waste-causing impacts inside and outside of their homes. Dumpsters in the community are poorly maintained, not changed out, or cleaned regularly, attracting raccoons, bees, flies and maggots. Dumpsters cause unpleasant odors outdoors and some residents in close proximity to the dumpsters can smell the odor in their homes. There are members of the community who do not use the outdoor trash bins and instead leave trash on the ground. Some residents reported frustration with too-small and poorly maintained composting bins near dumpsters. They shared that home composting was not permitted.

Soil

Participants described being limited in their gardening. In Willowbrook, the BHA limits the square footage of garden beds each resident can cultivate in their yard, and the soil quality reportedly does not sustain plant productivity. Participants reported the soil around homes contains construction debris, is dry, and crumbles easily, but forms a hardpan. Drainage issues likely stem in part from—and contribute to—the quality of the soil.

Water

Participants in Orchard Village reported issues with standing surface water and flooding, most notably in parts of the community sited adjacent to a wetland. The flooding is caused by a combination of runoff from rain and snow and overflow from the wetland. Participants reported hazardous walking conditions in the winter due to ice. In the Spring, the ice melts, and the water gets into apartment basements, causing issues like mold and water damage.

When DEC staff attended in-person debrief meetings in Bennington, residents had questions for them about distinguishing between primary (drinking water safety) and secondary (appearance and taste) concerns, and about the sourcing and status of their water supply. That brief conversation illustrated the potential to build understanding, participation, and connection through direct outreach on everyday topics of concern. Twenty-two participant households, all on city water, tested their home water at the faucet for lead and bacterial contamination. All results came back negative for contaminants. While all participants reported being relieved by the findings, few said the tests would convince them to drink their tap water.

Participants in both Bennington and the NEK were keenly interested in, and concerned for, the safety and quality of the water supply in homes and schools. We found—and experienced within our own team—initial lack of understanding and difficulty in accessing geographically-specific information on community drinking water sources, water quality, and how the state regulates and stewards them.

Accessibility, Eviction and Hyper-regulation

The Willowbrook low-income housing neighborhood in Bennington, Vermont has a central shared green space. Its wooded edge, a stream and rail trail bike path are barred by a 6-foot chain link fence with no gate. Accessing the central green space, like accessing other benefits in the neighborhood, is highly regulated by the BHA. Parents of children seen climbing trees are issued a warning letter, accompanied by a threat of eviction. Performing simple tasks—like changing a lightbulb or replacing broken blinds—instead of paying a fee and waiting for overtasked maintenance men to arrive, also generates a threat of eviction. Outside of apartments that overheat in summer, kiddie pools and slip-'n-slides are prohibited, and backyard gardens must be small, to limit residents' water usage. Parents of many of the 75+ children in the neighborhood don't let their kids use the central play area, where trash, including aluminum cans, get mowed in shards into the lawn, sometimes alongside drug paraphernalia.

Fewer than half of neighborhood residents have cars to access lakes, rivers, parks and other recreation opportunities outside the neighborhood, and access by bus is limited. Although shared green space is intended, most residents do not experience it as safe, accessible, or welcoming.

Commenting, Complaints, Permitting and Rulemaking

Vermont Law School's Environmental Justice Clinic led sessions in each selected community on utilizing existing DEC and Agency of Natural Resources (ANR) tools to seek information on water quality or open permits or rules, comment on a proposed permit or rule, or register a formal complaint. To make this information accessible to community members on an ongoing basis, the VLS team created and distributed a well-received [Resource Packet](#) for community members, which is included in the [EJ Public Resources Folder](#).

On Sunday, September 25, 2022, we engaged 53 community members in these Bennington housing communities, mostly parents and long-time residents, as well as the local Conservation District manager in two Community Legal Education meetings. Many residents had heard of the PFAS (Polyfluoral Alkyl Substances) contamination in wells and surface deposits in Bennington, and expressed fear that their water was unsafe to drink. They reported unpleasant smells, taste, and color of their water, all complaints that fall under "[Secondary Drinking Water Standards](#)⁸," according to the EPA, and are not enforceable. This community is on the town's public water supply, so we shared copies of the [2021 Consumer Confidence Water Quality Report for the Town of Bennington](#)⁹, which found no detectable levels of PFAS or other primary contaminants in their water supply. This report is required to be shared with all public water users. None of the attendees had ever seen the report, however, likely because they are all renters and do not pay the water bill directly to the water company. Residents understood that even if the water is tested at the distribution facility, there may be contaminants picked up in pipes along the way, such as lead or fecal coliform. The lead and coliform water testing kits we offered to all attendees were distributed at the conclusion of this event. We offered pickup of completed tests for residents without personal vehicles or work schedules that allowed them to deliver their samples to the Bennington Health Department Office by the midday drop-off deadline. At a follow-up meeting, we returned printed test results and reviewed what they meant.

We then gave a brief tutorial on using the [ANR Atlas](#)¹⁰ to find hazardous sites and PFAS data. People were generally excited to learn of this public portal of environmental information, and wanted it to be more accessible on their phones. We also shared information about the proposed electric vehicle rule open for comment at that time, and how to make a comment via the [Rules Portal](#). Many residents expressed concern over the rule's future restrictions on the purchase of new gasoline-powered cars due to the limited availability and expense of electric vehicles, the unintended consequence of increasing the cost of used cars, and the environmental and financial costs to make and replace batteries. Residents stated they understood the desire for cleaner air, but that these rules would only improve the air for the wealthiest Vermonters. Several residents indicated that they would file comments on the rule.



I appreciate all the time and effort you are all putting into helping families like mine and the community we live in. There is so much that needs to change and until you all started coming down and educating us, I honestly had no idea there was much any one of us could do about any of it, let alone where to even start to look. I very much look forward to becoming more actively involved to help initiate change. I would like to leave this earth knowing it's in better condition for my children and my grandchildren. I am definitely going to leave a comment on the site before the deadline. Thank you for taking the time to enable us to get our voices out there!

- Participant reflection on the training, meetings and resource packet



Community meeting in Bennington

Northeast Kingdom (NEK)

Local Collaborations

The EJ CE team partnered with Slingshot Community Action and consulted, collaborated with, and received support from representatives from CVOEO, DUMP (Don't Undermine Memphremagog's Purity), Northeast Kingdom Community Action, the NEK Collaborative, NEK Council, the three Natural Resources Conservation Districts in the Kingdom, Rural Edge, Newport Regional Planning Council, Rural Community Transportation, Sustainable Montpelier Coalition, and St. Johnsbury Community Hub. We also spoke with key DEC personnel with present and past responsibility for NEK-based community water systems, waste management, and permitting.



Vermont country road and farm

Community Priorities

To understand NEK residents' ideas and concerns, we initially used flyer-ing and canvassing in mobile home parks, and invited residents to an informal, drop-in "coffee hour". We also held brief open-ended conversations over meals at senior centers. We consulted broadly with local organizations and groups, and we compensated organizational representatives for their time. When invited, we collaborated on our outreach and inquiries with their planned in-person gatherings. In addition, team members identified organizations working in the region to co-host a successful NEK-wide online forum with us to highlight solutions to transportation equity issues and discuss their application locally". For more detail on these methods, see Appendix 3 - Methodology

Substance Abuse Treatment, Mental Health, and Healthcare

Healthcare access was a consistent concern and topic of discussion for many community members. Elderly community members often had several medical concerns that needed regular attention and occasional specialist attention. These needs created a financial burden for many who survived primarily on Social Security income. Access to medical care was further impeded by transportation issues, poor cellular and internet connectivity, and the dispersed settlement and limited infrastructure of this rural region.

Many community members shared stories about neighbors, loved ones, and friends who had suffered from substance abuse issues, including death from drug overdose. These stories were sometimes coupled with admissions of fear of or disdain for immigrants crossing the nearby international border, who they accused of perpetuating drug issues. However, others attributed these issues to a lack of adequate mental health services, coupled with issues that compounded mental health challenges, such as poverty, unemployment, and an apparent lack of upward mobility in Kingdom communities.

Transportation

For community members living in rural locations, personal transportation is critical if they are to access essential goods and services. In one mobile home park that had a frequently visited grocery store located across the street, most residents still chose to drive their personal vehicles, especially in colder weather. Income, age, and disability often

complicate transportation access. One participant reported issues with the cleanliness of buses, where companion animals may carry infestations or trigger allergies that affect other riders.

Thirty-one NEK residents turned out for a virtual forum on transportation in September 2022. During the contract period, RDI conducted parallel outreach focused on transportation in all three selected communities, as part of a transportation equity-focused subcontract with the Vermont Agency of Transportation (AOT). Additional information can be found in [RDI's report to the AOT](#) in the Resources Folder.

DEC Areas of Focus

Waste

For NEK residents living in mobile home parks, waste management was a common concern. Those with mobility issues often had difficulty disposing of materials that needed to be taken to a landfill or transfer station, due to lack of appropriate transportation or physical ability. The challenge of yard waste disposal was another frequent discussion point.

Furthermore, many expressed frustration regarding the state requirement to compost food waste, as they lacked disposable income for, information on, and/or access to services that would allow them to do so. At-home composting for some was out of the question due to mobility issues or a lack of information. In densely-packed mobile home parks, residents felt home composting was inappropriate.



Landfill filled with plastic bottles

Separately, the active Coventry Landfill was a common concern among the residents of this area. Leachate and contamination of groundwater and Lake Memphremagog, which many described as a drinking water supply in Canada, was central to these concerns. PFAS contamination was perhaps the most pressing specific concern for community members, though most simply had broad worries about the safety of their community and drinking water in relation to this high concentration of waste. The sounds, smells, and impact on local roadways of waste transport was an additional related concern.

Perhaps inspired by a recent case of corruption in the municipal government of Newport, some speculated that local government corruption led to the Coventry Landfill (and the tax revenue it produced) gaining priority over local health and wellbeing. The existence of this site as the sole active landfill in Vermont led some residents to express that they

were victims of environmental injustice, calling the region a “sacrifice zone,” selected due to poverty and distance from decision-makers and those with power. The landfill’s presence sparked a great deal of mistrust in state and local agencies. It served as a constant reminder that these bodies were willing to allow contamination and harm in their communities while they received little control or benefit.

Water

In mobile home parks, runoff and flooding was a recurring theme in conversation as residents reported persistent difficulties associated with storm runoff and winter ice. Especially in the winter, when floodwaters froze over roads, walkways, and driveways, these issues translated into mobility and transportation concerns.

Flood-prone Mobile-home Neighborhoods

While knocking on doors in an elderly mobile home park outside of Newport, we came upon a large berm built out of stones and soil in front of one home. One of the residents approached us and shared that their home was prone to flooding that dammed up her driveway and posed a safety hazard for her, her kids, and her elderly grandmother, who also lived in the home. Floodwaters caused mold issues, insect issues, and mobility issues as the frozen waters immobilized cars and encased walking paths. Her neighbor, she explained, had even worse luck—rainwater regularly flooded their home. In parks like these, the roads are maintained and established by the park, yet while those roads may be the source of flooding, residents are responsible for their driveways, leaving the burden and cost of repair on them.

Primary infrastructure issues in this community included housing, road conditions, and safe walking and biking infrastructure. Several mobile home residents brought up issues of flooding, ice, and snow that made it difficult to access their vehicles, drive, or walk. They explained that the flooding was typically caused by the design of internal park roads. They suggested that park management should work more closely with state agencies to ensure that roads are built in a responsible manner and to ensure that park owners are accountable to residents.



Dock on a lake

Fishing was a frequently-reported recreational activity in the area, and some wondered about the water quality and its impact on their cherished hobby. Some commented on the proximity of a popular local fishing hole to a wastewater treatment facility.

Safe to Fish?

During their regular weekly gathering at a senior meal center, elderly residents from Newport gathered and ate as we held brief small group discussions. Many concerns were shared about Lake Memphremagog: blue-green algae blooms, impacts of landfill leachate, and the discharge from the wastewater treatment facility. Fishing was a common pursuit. One participant shared that she had frequented a popular fishing spot where the Clyde River meets the lake, until somebody let her know that there was a small sign, out of view, which discouraged fishing due to close proximity of the wastewater treatment facility. She was shocked to learn this information, and felt that the signage was inadequate.

Commenting, complaints, permitting and rulemaking

Some NEK residents we spoke with had been actively engaged with the DEC, especially over the past four years. They had serious concerns for waste management at the Coventry Landfill and throughout its “wasteshed.” Their concerns included the landfill’s presently known and future impacts on soil, and especially on groundwater contamination, lake health and potable water quality, as well as air quality and noise impacts of waste delivery.

A DEC staff member shared an experience where NEK community members were frustrated with the permitting process and verbally expressed their anger, fear, and concern. The staff person further explained that, according to DEC regulations, staff are only allowed to make changes to open permits based on comments that request specific changes or express specific, primarily technical, concerns with the open permit. When community members are interacting with a DEC staff person on a proposed permit, the staff person can only address comments that are made on the permit or on the relevant state rules or laws. Often communities have concerns broader than the specific permit under comment. Staff expressed there should be outreach and support to concerned community members on how to participate most effectively in DEC's public processes.

Similarly, NEK residents reported—and DEC staff confirmed—that DEC technical (permit-writing) staff were not permitted to answer community members’ questions while preparing a permit. While we understand that DEC staff is required to follow the procedures outlined in state and federal law, community members expressed that this results in poor communication and distrust towards DEC staff. The procedures, or adherence to these procedures, pose a significant barrier to developing relationships and trust when residents are face to face with DEC staff throughout the permit development process.

Access to meaningful participation

On Sunday, October 2, 2022, the EJ CE team hosted a meeting at the Old Stone House Museum in Brownington, VT. The meeting was attended by 12 community members, including representatives from local environmental advocacy organizations, political affiliates, Conservation Districts, food security organizations, and other concerned residents. The focus of this meeting was on permitting and the environmental complaint process. The participants of this meeting had been

“You have to have faith in people and organizations you’re making your complaint/comment to. Right now it feels like you make a comment, it gets thrown into the inbox, onto the pile. **Everyone who makes a comment wants to feel they’ve been heard.**”

- NEK resident, emphasis added

heavily involved in previous permitting processes relating to the Coventry Landfill. As noted previously, they consider their community a “sacrifice zone”: an area in which the state’s prison, landfill, asphalt plants, and wind farms are disproportionately located.

We shared information on submitting comments to the open permit for a carbon filter on a portion of the Coventry Landfill. While most attendees were very familiar with the permitting process, none were aware of the environmental complaint process. They expressed interest and relief about having an option to file an environmental complaint relating to PFAS contamination and other pollutants without the need to hire an attorney, and stated it was helpful to be shown a method for communicating with the government about their concerns at any time, not just during public comment periods. We provided a brief tutorial of the [ANR Atlas](#), an informational tool of which none of the participants had been previously aware. We concluded the meeting with a brief visioning session, in which the community members began to design their vision for the future, and contemplate what remediation of the unlined portion of the landfill could entail.

Below are some of the participants’ observations relating to the information shared at this meeting:

Meaningful Involvement: Public comment periods should be the first thing the state does, not the last step in the process. By inviting the public in at the end of the decision-making process it seems as if the decision has already been made and the public comments will not have a meaningful impact on the outcome. The DEC issues the responsiveness report immediately prior to the permit or rule being approved; there is no conversation or ability for the community to ask follow up questions.

“It’s silly that they’re asking for comments on issues when they’ve already made up their mind.”

Pollution: *“I heard we can’t drink the water.”* Lake Memphremagog, although not a direct drinking water source for Vermonters, is a drinking water reservoir for Canada, and yet the state of Vermont does not recognize it as such. There are sandy soils in the region and private wells near the lake, so participants expressed real concern that contaminated water is shared across the water table. [ANR Atlas](#) shows wetlands directly adjacent to the landfill. Under present-day wetland rules, a landfill would likely not be permitted due to its proximity to wetlands. Community members were interested in a hydrogeological survey of the region to understand whether or not the aquifer next to the lake is fed by the lake. Toxic soil is coming into the Coventry Landfill from “big dig” projects.

“We have submitted well-researched public comments opposing landfill actions, but they are dismissed.”

Communication: There was interest among participants to connect with other communities that are facing similar issues. There was a specific request from this community to have a hearing with a large group of staff from the DEC or ANR, not just one or two administrators, to hear from the community directly and seriously consider their fears, concerns, and desires. They expressed that it seems as if the agency sends “higher-ups” to these meetings to absorb and assuage the community’s frustration, but that with a larger audience of scientists and policy experts the community and the agency could build real understanding and solutions. Plans for remediation of the unlined portion of the landfill have existed since 2006, but no action has been taken. Opening a dialogue between the community, Casella, and the state around a plan for remediation of the unlined portion of the landfill would be a tangible next step for this community.

“We need a Citizen Advisory Council with teeth to take action and help the public make decisions before there is something to complain about.”

Decision-making: Participants expressed empathy for DEC representatives as human beings who are trying to do their jobs, and strongly believe that environmental and health decisions must be separated from politics. The siloing of departments makes it difficult to get information flowing. The [new state environmental justice law](#)¹¹ tasks agencies to consider what environmental benefits and burdens are impacting a community; participants wonder if the Casella permits would pass the test if they were considered among cumulative impacts.

“These may be systemic issues, but it seems like government officials are making decisions based on politics rather than science.”

Public Perception: Based on the payments DEC receives from Casella per unit of waste for landfill utilization (part of the Department’s mandated funding structure), participants perceive that the state is benefitting from the relationship with Casella, so it is not in the state’s interest to hold the company to a higher standard. It was noted that Casella was a large donor to the current governor’s campaign. Regarding PFAS testing, it was suggested that the state consider switching auditors every few years to reduce the perception of collusion or corruption. There is also a perception that state agencies do not want to encourage robust engagement, and intentionally limit investment in public outreach. Participants were surprised that this community engagement work and their participation in the meeting was being funded by DEC, although they were skeptical whether it would lead to meaningful change.

“The DEC should not stay with one vendor for too long.”

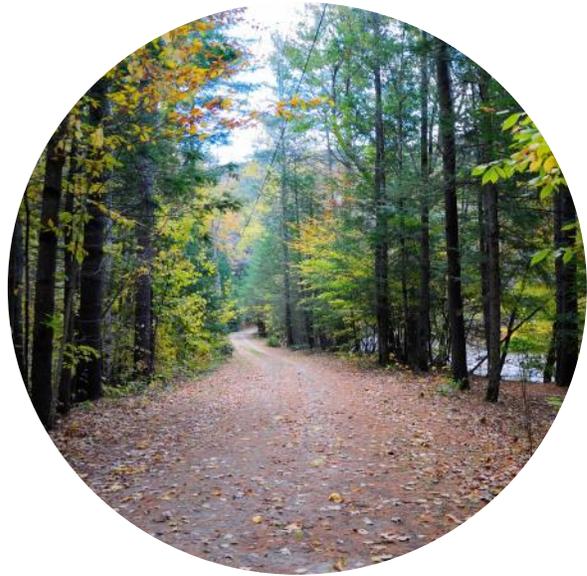
“For the first meeting about the dump they just put a tiny notice in the paper.”

Community member’s suggestions for improvements to public input processes, outreach format and timeline for soliciting and reviewing public comment are incorporated in the Recommendations section of this report.

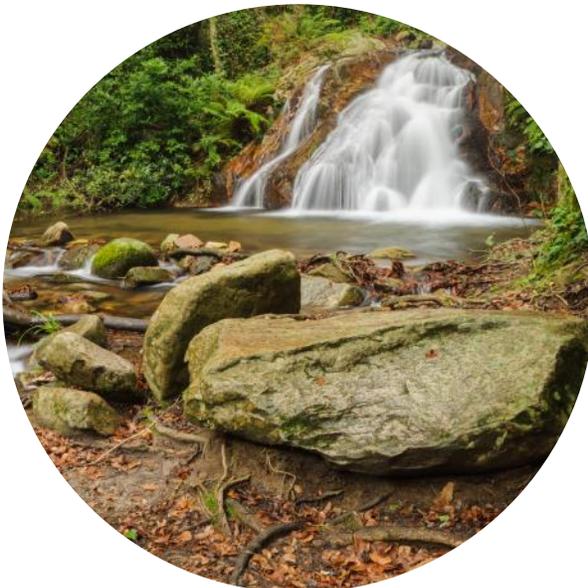
A collaborator from Slingshot Action Collective closed our October 2, 2022 community meeting by asking participants to consider a the following questions: *What does a healthy, thriving NEK look like?* Community members responded, “There is meaningful, ongoing investment in reduction of harm,” and “What would it mean if everyone's waste stays where it is produced?” When asked, *what does your ideal, easy, transparent state decision-making process look like,* one community member wisely suggested the DEC engage, “Early and often, start here, end here.”



Coventry landfill, ANR staff photo
(nolakedump.com/landfill_impact)



Dirt road with autumn leaves



Swimming hole



Girl in leaves, Photo Voice submission
photo by: Fardowsa Ibrahim

Burlington/Winooski

Local Collaborations

In Burlington and Winooski, we collaborated with the Peace and Justice Center and Vermont Legal Aid. We consulted with AALV, the Health Disparity and Cultural Competency Committee (HDCCC), a representative of the New American Council, the Director of Racial Equity Inclusion and Belonging, the City of Winooski's Director of Equity, state representatives, a cultural broker, and a city councilor.

Our collaboration with the Peace and Justice Center allowed us to combine resources for our respective purposes. The Peace and Justice Center was seeking feedback from BIPOC young adults on a specific planned transportation infrastructure development in the Burlington area, which dovetailed nicely with our purpose and provided an opportunity to test collaboration with an organization with a complementary agenda and purpose in engaging the community. In our partnership, we held two meetings, one in person and one virtually. We combined our stipends and were able to offer a higher compensation to attendees. We found the group to be most engaged by tangible exercises such as reviewing and commenting on a particular project or development. Based on participants' expressed concerns, Vermont Law School's EJ Clinic and Vermont Legal Aid created an informative discussion and provided resources on legal avenues both for active public participation in environmental decision-making processes, and for addressing tenants' rights in a shared training session. This allowed us to share key informational resources at a single event, which proved efficient for participants.



Lake Champlain in Burlington

Community Priorities

EJ CE team members conducted outreach to BIPOC young adults in Burlington and Winooski via extensive flyering and canvassing at BIPOC-centered community events including Juneteenth festivities and an EID celebration hosted by the Islamic Society of Vermont. To elicit place-specific images, videos and narrative feedback on DEC areas of focus, the team bookended our engagement in Burlington and Winooski with two photovoice challenges (see EJ Public Resources). Contest themes were environmental benefits and harms; water, air, and soil quality, and waste. For more detail on these methods, see Appendix 3- Methodology.

Housing

Participants expressed frustration with obtaining housing in Winooski and Burlington. In addition to rental costs being high, rental opportunities are few. Participants reported that their youth was a contributing factor to their difficulty in obtaining housing, as they often did not yet have references, credit, or make enough money to afford housing on their own. Some participants resided in low income housing and/or received financial support such as Section 8 vouchers. Participants in these situations expressed concerns with their landlord's lack of attention or action to resolve housing-related issues as they arise. Second-generation New Americans help their families navigate state and other bureaucracies, as evidenced by high school students' attentive engagement with a presentation by Vermont Legal Aid on housing rights in tenant eviction proceedings.

Transportation

Transportation was also an issue of interest in Burlington/Winooski. Participants appreciated that buses were free, however, area residents-and members of all three most-impacted communities we engaged with-reported that bus schedules limited mobility. For example, transit riders struggled to get to work on Sundays, or for late shifts. Bus lines stop short of major employers, such as the Vermont Teddy Bear Company on U.S. Route 7 South, leaving workers to walk along high-speed arteries without sidewalks. At the transit hub, in roadside bus shelters, and on foot, they face exposure to fumes and extreme weather. In Burlington/Winooski, as in the NEK, participants reported issues with the cleanliness of buses, where pests, sometimes carried by companion animals, can torment riders.

In Winooski and Burlington, many members of the BIPOC community expressed appreciation for the presence of goods and services in close proximity to their housing, noting that they could walk across the street to get groceries and other necessities. Typically, walking was a preferred mode of transportation if their destinations were within a few miles, and they saw walking as a healthy and easy option. Bike paths were seen primarily as a recreational resource that is beneficial both to the environment and for participants' social lives. For those who drove personal vehicles, road maintenance was also seen as a major benefit that made driving easier, safer, and more enjoyable. Winooski and Burlington community participants reported that they typically walk and ride the bus as their primary modes of transportation.

DEC Areas of Focus

Water

Participants in Winooski and Burlington discussed drinking water and surface water. Some participants reported they preferred drinking bottled water to water from the tap. Accessing hot water was not identified as a concern. A photovoice participant identified the Winooski River as having both positive and negative impacts on the community. The participant described the river's presence and flow as soothing, particularly in the summer. The participant also noted the river contains waste and agricultural runoff which is harmful to aquatic life and to anyone that interacts with the river outside of admiring the river from afar. Another participant identified the waste in Lake Champlain as being problematic for humans and animals. At the photovoice challenge awards ceremony, the participant shared tips on how to keep Lake Champlain clean. These included, never dump used motor oil or paint on the ground or near a storm drain, never dump trash from a boat on the water, monitor green-blue algae, and volunteer around the community. The Project Coordinator experienced a flash flood in between Burlington and Winooski a small ways away from the Winooski River, and observed trash, and evidence of oil being carried through the rising water. A participant identified that they found litter at North Beach. Some participants identified litter as a cause of air pollution.



Girl drinking a glass of water

Waste

Waste was the most commonly identified environmental issue among the Winooski and Burlington BIPOC residents we spoke with. We saw multiple images of waste and litter in photovoice submissions (for a sampling of submissions see EJ Public [Resources Folder](#)). Participants explained that waste impacts green spaces, can pose safety risks to children at play, and can be harmful to local animals and plants. A participant shared that worldwide, over a million animals die each year after eating or being trapped in waste. Most participants acknowledged littering as a prevalent problem that can easily be seen by walking through neighborhoods. One person identified that homeless people setting up encampments results in littering, as it is difficult for them to properly dispose of waste. Participants drew connections between waste and the health of land, air, and water. They also reported the effects of cigarette smoke, carbon dioxide, and specifically, carbon monoxide emissions from gasoline-powered engines. Residents identified recycling efforts and clean-up efforts in neighborhoods as positive direct actions to address issues with waste. They acknowledged some efforts by their cities that have an indirect positive impact on waste reduction, such as addressing homelessness, composting efforts, and addressing environmental racism.

Commenting, Complaints, Permitting and Rulemaking

On Thursday, September 29th, 2022, we convened a virtual meeting of young mothers from the New American community in Burlington. Laura Gans from Vermont Legal Aid (www.vtlawhelp.org), shared information on housing programs and renters' rights. Jennifer Byrne of the VLS EJ Clinic (<https://www.vermontlaw.edu/academics/clinics-and-externships/environmental-justice-clinic>) presented on rulemaking, permitting, and environmental and civil rights complaint processes. The [ANR Language Access Plan \(LAP\)](#)¹², which will govern DEC language access policy, was open for comment at the time of this and a subsequent training. Unfortunately, not only the draft Plan but also all outreach content were shared only in English. In addition, in conversation with ANR staff, we learned that in order to have the draft Plan translated into any language other than English, a request needed to come to ANR directly from a primary speaker of the requested language. This requirement posed an additional barrier to language access. At each meeting, we shared a brief sample email request format and email contact information to request translation of the LAP.

Takeaways from community meeting:

- The group of parents were largely appreciative of having walkable, quiet neighborhoods, but generally had difficulty finding housing with enough space for their families.
- *“What is Vermont doing to make the process of buying a home easier or more equitable?”*
- They reported having trouble figuring out who to contact at the state when they were concerned about their health or water quality. Many wanted access to water testing for ease of mind.
- When told about the rulemaking and permitting process, they expressed that although it is a lot of information to keep track of, it was *“better to know than to not know”*, and that they would like to be informed.
- Critical environmental health notices such as water information could be shared in a letter via the landlord. These letters could be translated and/or interpreted into their languages as needed (namely Somali, Swahili, Arabic, Bhutanese, and Maay Maay).

On Friday, September 30th, 2022, we held an in-person meeting with high school students aged 14-18 at the Burlington offices of AALV (formerly Association for Africans Living in Vermont). Laura Gans from Vermont Legal Aid spoke briefly about renters' rights and shared contact information if their families were ever served an eviction notice. Jennifer

Byrne shared the [VT DEC Community Engagement Resource Packet](#) and information on how to get the draft ANR Language Access Plan translated into other languages. At the conclusion of the meeting, the director of AALV expressed interest in having presenters return to give the presentation to the full group of students involved in AALV's after-school program.

Key observations and participant responses:

- The youth all spoke English as their second or third language. Many reported having had to translate critical information for their parents. They seemed accustomed to being asked to assume adult responsibilities. As noted above, it was particularly striking to see them taking down information for how to call a lawyer if their family were ever served an eviction notice.
- The students were curious and excited to learn about rulemaking and permitting processes and how they can participate in environmental decision making.
- Participants commented that their parents do not have time to attend public meetings, especially in person, announced only in English, and without interpretation.
- Several attendees wanted to submit a request on behalf of their parents for translating the ANR Language Access Plan into Somali and Swahili, and wanted the Resource Packet translated, as well.
- Participants expressed wanting the State to email/text/call about critical information, similar to the Amber Alert system.

To pilot approaches to facilitating participation in rulemaking among Vermonters who speak languages other than English at home, members of the EJ CE team worked with cultural broker Dr. Mona Tolba. We worked with her to enable Arabic-speaking and other members of the New American community to submit formal comments on the changes to the electric vehicle rule open for comment during our outreach. We translated information on the proposed rule and drafted a statement in Arabic based on key elements of community concern. We then invited individuals to append personal comments on how the proposed changes would impact their personal situations. Finally, we submitted the comments via the portal in the original Arabic, appending an English translation for each.



Participants in Burlington/Winooski community conversations

Guidance and Recommendations



In this section of our report, the EJ CE team presents a set of recommendations for public outreach strategies and practices to include in the DEC's Public Participation/Community Engagement Plan. Their purpose is to increase meaningful public participation in DEC processes. These recommendations are presented using the structure and ordering of [EPA's guidance for public engagement and Title VI compliance](#)¹³, while offering steps to meet those federal recommendations in ways specific to the Vermont context. Our recommendations are based primarily on public input from community engagement carried out throughout the term of our contract with the DEC. They are also informed by our team's experience and knowledge of best practices for community engagement. That includes lessons learned from earlier research, including focus groups held both with members of highly impacted communities, and with DEC personnel.

#1 Develop and implement effective Public Involvement Plans

A Public Involvement Plan (PIP or Plan) lays out a plan of action for addressing the community's needs and concerns, relating to a specific issue or event. It may change from one affected community group to another or for the same community group over time, depending on the types of facilities in the community and the environmental issues faced by the community. An effective Plan keeps the community informed of public involvement opportunities available to them during the decision-making process. PIPs are public documents that should always be available for public viewing. PIPs should be living documents that can easily be revised at any time to effectively address the needs and concerns of the affected community. Hard copies and electronic versions of PIPs should be made available in accessible language for the public in areas that will be easily accessible to the community (e.g., libraries, community centers, town clerks' offices, listservs, and websites of trusted organizations, planning authorities and municipalities, etc.).

An effective PIP includes the following information:

- (1) An overview of the (federal funding) recipient's plan of action for addressing the community's needs and concerns,
- (2) A description of the community (including demographics, history, and background),
- (3) A contact list of agency officials with phone numbers and email addresses to allow the public to communicate via phone or internet,
- (4) A list of past and present community concerns (including any Title VI complaints),

- (5) A detailed plan of action (outreach activities) recipient will take to address concerns,
- (6) A contingency plan for unexpected events,
- (7) Location(s) where public meetings will be held (consider the availability and schedules of public transportation),
- (8) Contact information and instructions for obtaining translation of documents and/or interpreters for meetings,
- (9) Appropriate local media contacts (based on the culture of the community), and
- (10) Location of the information repository.

EPA recommends that an agency start by conducting an internal and external “situation assessment” of the needs and conditions of a decision and most impacted community members and other community-level stakeholders. The goals and assessment questions can be found in the [2021 Community Engagement Plan Legal Research Memo](#) provided to the DEC from the VLS Environmental Justice Clinic as part of this engagement contract.

#2 Training Staff

Build staff capacity for outreach and participatory approaches across the DEC.

According to EPA, in addition to a written plan, a successful public involvement program consists of knowledgeable agency staff who are committed to community engagement. **To understand the importance of building relationships with communities, federal funding recipients like DEC must incorporate these principles into the culture of the Department: how staff are trained and how programs operate.** Environmental justice principles and public participation concepts should be incorporated into job descriptions and the onboarding of new staff. Until staff have been supported, trained, and resourced to partner in engagements themselves, DEC should work through trusted third-party consultants, collaborators, and partners to engage members of impacted communities.

DEC should provide their staff with step-by-step training on:

Effective communication

- How to explain the applicable environmental program regulations to the public in a clear and concise manner.
- Skills and techniques to enable staff to effectively address community questions and concerns in an understandable, prompt, and respectful manner.
- Explaining ‘what to do, how to do it, and when to do it’ for all programs staff work in.
- How to engage in dialogue and collaboration.
- How to build and maintain trust and mutual respect with communities.
- How to hold space for and address conflict when it arises.
- Ensuring there is a thorough knowledge of all applicable public participation requirements as well as how to engage the public throughout the entire permitting and rulemaking process.

- A basic use of available and preferred technological communication tools such as the internet, databases, Geographic Information Systems (GIS) tools and site maps, etc. to help identify and address potential issues in affected communities that may give rise to Title VI and environmental justice concerns.

Working across differences

- How to engage and incorporate different forms of expertise and ways of knowing for staff traditionally trained and working in Western scientific frameworks.
- How to be sensitive to existing cultural and community relations.
- How to navigate tension and hostility when engaging with overburdened community members.
- Alternative dispute resolution techniques to enable staff to design and carry out a collaborative and informal process that can help resolve Title VI and environmental concerns.
- How to actively listen to, respect and value the public's concerns.



Handshake

Enlisting community liaisons and cultural brokers

To enable meaningful, sustained public participation in DEC decision-making, DEC will need to begin to plan, budget for, and hire community liaisons and cultural brokers (or contract with them through partners). These liaisons will:

- Bring to the DEC experience in fields like community outreach and engagement, creative facilitation, and science communication;
- Have lived experience and/or deep knowledge of highly impacted communities;
- Have a strong commitment to centering meaningful community participation in environmental decision-making, and to environmental justice principles;
- Be skilled in building trust and relationships with a variety of actors, particularly communities and organizations that DEC has not typically or historically engaged with;
- Work collaboratively within and beyond the DEC, including with groups who historically find themselves not represented or their identities not reflected among DEC staff.

#3 Focus on early, inclusive, and meaningful public involvement

Increasing access to opportunities for participation in environmental decision-making is a key way to achieve environmental justice outcomes. **Without asking first, listening, and testing methods, it is easy to expend considerable effort, staff time, and funds while reaching out ineffectively.** Achieving meaningful involvement requires outreach that is accessible in its language, content, and delivery through trusted entities and relevant platforms. DEC must seek to collaborate and plan for timely access for overburdened community members who do not typically engage with the Department, including Limited English Proficient (LEP) Vermonters, and develop internal capacity and institutional memory of past strategies that have and have not worked.



Handshake in a field

In Vermont, preferences for platforms and forms of media break down along lines that include socioeconomic class, generation, access to formal education and broadband internet, preferred language, politics and more. See more community-specific preferences from the Rejoice project in the [EJ Public Resources Folder](#). Those closer to power and resources must go out of their way to meet collaborators where they are: with meaningful compensation, in welcoming spaces, with co-created, accessible language, moving at the speed of trust to devise equitable solutions together.

Involve diverse Vermonters early and often throughout the decision-making process

Community engagement is an ongoing conversation and commitment to building and maintaining relationships. In this section, we outline key areas for enhanced public participation.

Prioritize compensation

The people and groups who directly experience environmental injustices or harms, and who are working to resolve and correct those harms, are already overburdened. They face heavy and intersecting burdens on their time, resources, finances; responsibilities to work, family and community; to their own health and wellbeing and that of the land and water they tend. They also hold key understandings of how existing systems impact individuals and communities. The earlier all appropriate parties are identified and brought into decision making processes, the greater the likelihood of reaching effective solutions.

Any effective policy, planning and action must take into account local knowledge and expertise, based in place, experience, and community. Doing so respectfully means compensating people who choose to share their knowledge at a professional rate, one that recognizes how rarely knowledge-holders are well-paid, securely salaried or offered benefits for their community-centered work. While people should not be compensated for formally commenting, testifying, or registering complaints, we strongly recommend compensating individuals and organizations for providing key information, participating in consultations and focus groups, and providing contextual expertise and knowledge based on lived experience. This recommendation extends to members of impacted communities serving on boards, commissions, and councils. Some important steps to take:

- Budget participant compensation into program and initiative planning:
- Work through partners, collaborators, and subcontractors to offer participant stipends or honoraria directly, if current Department policy conflicts with providing payments.
- Identify and advocate for the removal of agency or state policies restricting payments to participants.

See Participant Compensation Table used in 2020-2022 outreach in Appendix 4.

Enhance permitting process

The permitting process in Vermont has mandates for community engagement and public notice, such as posting on the [Environmental Notice Bulletin](#) (ENB; defined below) and providing written notice to adjoining properties. There could, however, be enhancements to this outreach process to invite input from and raise awareness among the wider community earlier in the decision-making process.

In order for comments to be seriously considered, they must be relevant to the open permit opportunity. In the case of the 2018 landfill expansion permit in Coventry, DEC staff reported that only 25% of the comments received were relevant to the actual changes proposed by the permit application. This indicates that the community is interested in participating in environmental decision-making in their community, but do not have the opportunity to contribute to the conversation in a way that is meaningful or relevant to them. This could be remedied as follows:

Invest in connection

- Build funds and staff time into budgets and project timelines for greater public participation.
- Whenever possible, establish and foster ongoing relationships with community-based organizations, prioritizing groups that have built foundations of trust with most impacted communities.

- Plan periodic check-ins with community-based organizations (CBOs) and advocacy groups for mutual updates and dialogue. This will help to establish relationships before a crisis or reason for concern occurs.
- Work with skilled external facilitators to convene concerned stakeholders in two-way dialogue with subject-matter experts and key agency decision-makers, **before** formal comments are due.
- Public notices are reviewed by lawyers and environmental scientists prior to distribution; consider sending notices for review by trained communicators to edit for language accessibility, as well.
- Work to change DEC culture and expectations of what constitutes a meaningful and actionable comment. Commit to honoring and consistently responding to public comments.
- Develop and maintain databases of interested organizations, groups and individuals, and their preferred contact method. Tag each by topics and regions or locations of interest, for use in outreach and follow-up.
- For NEK residents, opening a process for dialogue between the community, Casella, and the State around a plan for remediation of the unlined portion of the Coventry Landfill would represent a tangible next step.

Broaden commenting timeframes and accessibility

- Utilize community liaisons in potentially impacted communities to distribute educational materials detailing the considerations at hand and how to craft relevant public comments.
- Send notices of public participation opportunities to community organizations, listservs, networks, and public notice boards.
- Require permit applicants to hold pre-application meetings with the public prior to submitting their application to the permitting agency to open the dialogue between the permit applicant and the community in the very early stages of the process.
- Open public comment periods earlier in permitting and planning processes.
- Open a secondary comment period after the responsiveness summary report is released.
- Hold community-oriented Q&A sessions with knowledgeable agency staff scientists.
- Host regular open listening sessions throughout the year for impacted communities to speak to their agency representatives.
- Work to incorporate EJ principles into the norms and practices for soliciting, accepting, and integrating public comments, such that a broader range of considerations can be taken into account in siting, permitting and rulemaking, and a broader range of comments can impact decisions.



Listening session in Bennington

Deepen engagement and responsiveness through active follow-up

- Build in more time between the end of public comment periods and the final action, whether issuing a permit or rulemaking decisions.
- Give special focus on community engagement in permit processes that fall under the Permit Expediting Program (PEP), propose changes to PEP times and procedures to add more time for review and for hosting in person and virtual meetings with impacted communities.
- Add at least 2-3 additional weeks, depending on community concerns, to the turnaround in permitting/ rulemaking timelines for in-depth staff review of submitted comments.
 - ⇒ This will give time for staff to review and integrate relevant comments, and also ideally communicate with key commenters.
 - ⇒ This longer turnaround will allow for more dialogue and response to comments submitted, which will in turn increase commenters' sense that their comments were heard and considered.
- Hold follow-up events where the agency can report on what was heard and what policies and resources the community could use to relieve their issues and concerns.
- Encourage and attend community visioning sessions to plan for future remediation efforts.

Update the Environmental Notice Bulletin (ENB)

Invest in upgrades to the [ENB](#), the searchable DEC system that provides the public with information about applications that are under consideration by the DEC. It is updated daily, and includes permit, certification, and registration applications for most DEC programs.

Challenges with the ENB, identified by community participants:

- Hard to use, too many tabs, and outdated user interface;
- Minor and major projects are indistinguishable, no added transparency for larger projects;
- Almost entirely replaced public notices in papers, but most people do not access this website;
- ENB and the PDFs included in permit applications are not translatable into other languages;
- Not accessible to those without internet or computer;
- Not easily usable on a mobile phone;
- No GIS or mapping component.

Recommendations for ENB:

- Invest in upgrades to ENB
 - ⇒ Mobile application with permits viewable on a map,
 - ⇒ Create communication component on map to accept comments through the app;
 - ⇒ Create ability to set phone alerts based on location/proximity/radius;
 - ⇒ Translate critical information, especially summaries and public meeting notices;
 - ⇒ Simplify user interface with public-facing user experience in mind.
- Do not over-rely on ENB
 - ⇒ Continue to send notices to newspapers, mailing notices to residents;
 - ⇒ Send notices of public comment periods and public meetings to local community organizations:
 - ◇ Natural Resources Conservation Districts, Regional Planning Commissions;
 - ◇ Community Action Agencies, Conservation Commissions, Town Selectboards;
 - ◇ Other known community networks, listservs, and organizations.

Encourage robust participation in rulemaking opportunities

Most people do not realize the impact that environmental rules have on their day-to-day lives. In general, historically underserved and overburdened Vermonters do not participate in or are not even aware of rulemaking as an opportunity to have their voice heard. When shown how to participate, many are eager to weigh in on decisions that will directly impact their lives and their community.

- Use accessible language. It is challenging for the average person to read through proposed rules to identify the relevant portions that will have real impact on their lives.
- Summary rule descriptions are sometimes written with a tilt toward a particular bias or desired outcome. Engage community expertise to review for unconscious bias.
- The [Vermont Environmental Justice Advisory Council](#)¹⁴ created by [Act 154, the 2022 Vermont environmental justice law](#), is tasked with reviewing rules with environmental justice implications; DEC should consult the Council on improving the transparency and effectiveness of this process.

NEK community members, especially, reported that the responsiveness reports released by DEC after a public comment period can seem dismissive and/or conclusive; closing the door on further discussion with the impacted communities. This promotes a perception that the comment periods are just a box-checking exercise.

- Avoid unintended impacts by proactively identifying ways in which a proposed rule may directly or indirectly impact individuals and communities, with guidance from the EJ Advisory Council established under Act 154.
- Seek input reflecting different points of view and carefully consider input.

- Allow for a secondary comment period or open hearing, where the community can reflect on the Agency’s final decision and Responsiveness Report.
- Translate proposed rules and summary descriptions into languages other than English.
- Send notices of rulemaking opportunities to community organizations, networks, listservs, and public notice boards.
- Increase accessibility and visibility of the [Rules Portal](#), consider building a mobile app to accept public comments.

#4 Encourage stakeholder and intergovernmental involvement

- Develop and maintain collaborative relationships with organizations and individuals whose programs and initiatives have built trust over time with members of most impacted communities.



We are locked into silos, when we need to be thinking comprehensively and looking at co-benefits and points of intervention.
- Develop and document these relationships with multiple staff members, in case of staffing changes.
- Work across ANR and other agencies to de-silo programming.
- Work across DEC divisions on permit actions; create a clearinghouse for public engagement across DEC programs.
- Connect with the [Interagency Environmental Justice Committee established by Act 154¹⁵](#) to engage across agencies and collaborate on community engagement.
- Make Division roles and responsibilities clear on the DEC website.
- Partner with Conservation Districts and Regional Planning Commissions (RPCs) to access communities.
 - ⇒ Conservation Districts are outreach and engagement experts, with a focus on linking landowners and land stewards, especially farmers, to programs that enhance environmental quality and livelihoods. Conservation Districts chair Local Working Groups, which are longstanding, locally-led information-gathering sessions that allow community members to weigh in on natural resource and environmental funding, policy, and programmatic decisions being made at the local, state, and federal level
 - ⇒ RPCs coordinate municipalities and communities on infrastructure and planning projects that often directly impact frontline communities, and also have an emerging role in implementing the state’s Initial Climate Action Plan.
- Community organizations and liaisons, brokers, or organizers in Vermont are almost always under-resourced. Seek opportunities to resource these partners through grants, contracts, subcontracts, and consultancies, and recognize their contributions to DEC initiatives through stipends, honoraria, and donations or sponsorships to the organizations.

- The reported experience of VDH during the pandemic suggests that these collaborative relationships will enable swifter, more community-connected and effective responses to emergent situations.
- Acknowledge concerns communities have with existing facilities near and/or impacting residential areas and work with those communities to develop outreach strategies to address their concerns.
- Work with the appropriate authorities to ensure that data regarding the demographics and location of existing facilities in communities are considered before making local land-use and planning decisions.

Meaningful engagement, again, requires outreach in accessible language, and delivery through trusted entities and relevant platforms. For the DEC, it will require ongoing collaboration with partners and internal planning to ensure timely, welcoming access for LEP Vermonters, as well as internal DEC capacity-building and sharing institutional memory of successful strategies.

#5 Equip communities with tools to ensure effective public involvement

- Ensure that decision-making processes are open and accessible to all interested groups, including those with limited financial and technical resources, English proficiency, and experience participating in environmental decision-making.
- Plan regular annual or quarterly public meetings to discuss upcoming projects, permits, and processes in each region.
- Hold meetings at neutral locations and in formats that are accessible and welcoming to most impacted communities. Hold public meetings both virtually and in person, at accessible times for the communities in question.
- At in-person meetings, provide childcare, food, and offer avenues for young people to participate. Doing so makes meetings more welcoming and lowers barriers to attendance for those who would otherwise need to spend their time cooking, cleaning and caring.



Kids participate in a youth mapping exercise, Bennington

- Work with engaged community members and paid community liaisons or cultural brokers to set agendas, choose locations, and plan for appropriate food offerings.
- Use skilled facilitation, create spaces of listening, dialogue and open conversation, and two-way information sharing.
- Coordinate with community leaders to visit impacted sites and communities. Bring DEC staff, including technical staff, and partner with the [Vermont Department of Health](#), Agency of Transportation or [Office of Racial Equity](#) as appropriate.
- Make expected and effective format and content for public input clearer and more accessible.



Listening session with food provided

- Use easily accessible guides, templates and other tools to support community members in making public comments and complaints online, in print, and at public forums.
- Collaborate with ANR Civil Rights Compliance Director to improve ANR Atlas outreach and features:
 - ⇒ Create and distribute educational videos and guides for using ANR Atlas;
 - ⇒ Conduct educational outreach in schools using the ANR Atlas;
 - ⇒ Create mobile version with key environmental and health data;
 - ⇒ Add groundwater data to ANR Atlas;
 - ⇒ Add public alerts feature for combined sewer overflows, other water quality or environmental health incidents.
- Ensure Water Quality Consumer Confidence Reports are accessible
- Encourage landlords to share consumer confidence water quality reports with renters.
- Translate reports into other languages.

Public Awareness Campaigns

“These are not simple issues; simply writing a letter or an email does not benefit these communities.”

- Consider creating an information packet with useful information or fact sheets regarding applicable environmental regulations, the public involvement opportunities in environmental permitting programs, and the important role community involvement plays in helping to address community concerns early in the permit decision-making process.

- Host targeted or one-day training sessions on different subject matters relating to public involvement and permitting. These sessions could include presentations/discussions on the importance of public involvement or a walk-through of steps included in the permit review stage, while focusing on public involvement options and opportunities in the permitting process. For example, such a session could consist of discussions on the types of information needed to review a pending permit and pointers on how to prepare effective technical and legal comments.
- Hold specific “how-to” sessions for the public that illustrate through role-playing how they can effectively participate and influence decisions during the public involvement process.
- Engage with lawmakers to share about the time commitment necessary for community engagement, and give examples of community engagement leading to positive outcomes, saving time and money in the long run by investing in strong relationships.
- Clearly articulate to the public what type of input is being solicited, what impact or influence the input may have on the project and, just as importantly, what decisions or aspects of the project cannot be influenced by public comment.

Language Access and Accessibility

DEC should incorporate the provisions included in ANR’s Language Access Plan, and:

- Build in language translation and accessible language into project timelines and budgets for website content, notices and announcements, processes, and public forums.
- Work with advisors, cultural brokers, and outreach specialists to make concepts and definitions accessible and relevant.
- Develop simple English-language content, for reading abilities below a high-school level and for facilitating translation.



Family bike ride, Burlington, photo by Fransine Nigena

- Use ample blank space when designing flyers and informational documents to make documents more accessible to elders and those with traumatic brain injury (TBI).
- Create a Zoom video recording of a training on how to use DEC engagement tools that can be cut into short, accessible topic-specific segments in all relevant languages for the state.
 - ⇒ Meet with qualified interpreters in advance to plan accessible meeting content, vocabulary, pacing, flow, and test technical aspects.
 - ⇒ Then, use the multiple-language audio line capacity of the Zoom platform to cost-effectively record the training video along with simultaneously-interpreted accompanying audio in all desired languages.
 - ⇒ Work with locally-recommended and respected interpreters, not national services where interpreter quality, dialects and regional linguistic differences can create more barriers. Vermont Language Justice Project, AALV, and USCRI may be good potential partners.



Computer laptop with virtual meeting interface



A word bubble with several different languages

- When relevant, include American Sign Language (ASL), using pairs of interpreters and best practices for online forums, or call-in options that let Deaf speakers utilize the most effective technologies from their home, like Video Relay Service.
- Collaborate and plan for timely access for LEP Vermonters, and develop internal capacity and institutional memory of successful strategies.
- Provide signage in other languages.
- Provide easily accessible interpretation options by phone and website.
- Use platforms and forms of media to effectively reach members across socioeconomic classes, generations, education, geography, language, and more.

#6 Make assistance/grants available to the public

The importance of community engagement is grounded in the understanding that governing structures were designed to elevate the rights and access to resources of some people at the expense of others and that systems cannot change without the direct involvement of the communities that bear the weight of systemic disparities. Intentionally and consistently enhancing access to resources for all community members is critical to achieving equity in Vermont's resource distribution system.

Drinking Water Resources

- Deepen communication between Vermont Department of Health (VDH) and DEC drinking water divisions.
- Increase transparency and outreach on water quality concerns in drinking water. Ensure public drinking water notices are distributed in accessible language and locations.
- Collaborate with VDH to exchange data and resources, and create an internal notification process for when VDH identifies issues in the community. Connect maps and information to target resources in a coordinated fashion.
- Collaborate with VDH to make filters easily accessible to low-income communities to address primary and secondary contaminants.
- Increase outreach to private well owners on how to test their water and seek to expand funding for private well testing and broadly communicate its availability.
- Make data on community drinking water systems more readily available and searchable.
 - ⇒ Make water testing kits clearly available and affordable, and free for low-income residents on DEC and VDH websites.
 - ⇒ Review and update existing public data portals to improve useability and data availability.
 - ⇒ Consider running a “know your source, protect your source” media campaign to educate public water system users on the source of their water. Engage students and teachers.
- Offer water tests at community gatherings and celebrations.
- Make PFAS test kits available to concerned citizens.
- Coordinate with local housing authority personnel to facilitate accessible drop-off of water samples for residents with mobility issues, or who work during local drop-off hours.
- Create sample drop-off opportunities at county Health Department offices outside of standard work hours.



Water samples dropped into beakers in a lab

Grants and Contracts

- Consolidate grant access into one web portal.
- Communicate state contract opportunities via newspapers, trusted organizations, community liaisons, local listservs.
- Consider giving ranking preference to applicants with relationships in local impacted communities.
- Strive to broaden access to contract bid websites by local businesses and organizations.
- Continually conduct public outreach campaigns on how to access the Rules Portal, Environmental Notice Bulletin, Contract Bid Website, and DEC Grants.

#7 Use alternative dispute resolution

EPA strongly encourages recipients of federal funds to consider and use Alternative Dispute Resolution (ADR) techniques where appropriate to prevent and address concerns regarding public involvement in the permitting process, such as those detailed in the NEK section of this report, for example. ADR refers to voluntary procedures used to prevent and settle controversial issues by developing and implementing an outcome agreeable to all parties, using facilitation, mediation, and joint fact-finding. The goal of ADR is for stakeholders to collaborate and resolve issues acceptable to everyone involved.

Increase knowledge of the environmental and civil rights complaint processes

“The bottom line is that you need faith in the people you’re making a complaint to.”

Most community members we met with, even those who had participated actively in commenting on permits and rules, were completely unaware of the existence of environmental or civil rights complaint processes. Communities with environmental concerns particularly appreciated being shown a process by which they could communicate with their government at any time of the year, not just during open public comment periods. The environmental complaint process and Title VI complaint process are equally difficult to find or engage with using current Vermont state websites.

Encourage robust involvement in the development of Corrective Action Plans

Bring in community voices early and often if a Corrective Action Plan will likely be developed to deal with a contamination issue or event. Conduct outreach to community outlets, organizations, listservs, and networks when a contract is posted for Corrective Action Plan development. Conduct outreach to community organizations, listservs, and networks when public comment periods are open for Corrective Action Plans.

- Create a clear path to file complaints on the front page of all Vermont state websites.
- Update the Environmental Enforcement Officer contact information regularly.
- Allocate additional enforcement services in potentially vulnerable communities.
- Educate community organizations on the complaint process.
- Publish enforcement actions, send out quarterly reports/bulletins.
- Use storytelling to increase public trust in the complaint resolution process.

Conclusion

Policy development, including rulemaking and enforcement, which is not grounded in the lived experience of those who are currently suffering most, will ultimately fail. This report offers a window into the lived experience of some of the communities most impacted by environmental injustice in the state. To effectively increase the equitability of benefits, and decrease the disparity of harms, DEC and other agencies must take the time to listen and understand which facets of environment and environmental health are relevant to different Vermont residents' everyday lives. In other words, start where people are at. This will require new approaches, tactics and procedures developed over time with diverse input from environmental organizations, community-based organizations and groups, social and environmental justice organizations, activists, public health and health equity organizations. Throughout our community engagement efforts, we emphasized centering community voices as the starting place, the foundation of future environmental justice work in Vermont.

It is important to state that the work of addressing environmental injustice in Vermont today is happening in myriad ways, by different organizations, neighborhood groups, faith communities, and state and local government agencies. This effort is one among many. To the extent we are able to share learning and strategies from this report, we will accelerate the implementation of good policy, and find solutions and pathways that will create access and redress to those who continue to be harmed by environmental injustices. To accomplish this, it will be important to share information and power across agencies, to work in more coordinated and interdisciplinary ways to create holistic responses to the needs of Vermont communities.

There are two immediate opportunities for us to do just that. The first is by doing all we can to keep pushing for incorporating and practicing [just transition principles](#) (outlined by former state legislator and Rights and Democracy Executive Director Kiah Morris) in our Global Warming Solutions Act climate policy implementation. The second opportunity is work in coalition to ensure equitable implementation of Vermont's new [EJ law - Act 154](#). As we write this report in early 2023, the Agency of Natural Resources is standing up an interagency working group and an EJ Advisory Council, as well as hiring two new EJ staff. We are aware of leaders at the Vermont Department of Health and the Agency of Transportation who are also exploring how they can and will better address equity in their work.

This is a powerful time in Vermont's history—and we are reflecting what is happening across the country and globally. We need interdisciplinary work across race, class, accessibility, language, and socio-economic differences. Our hope is that the work that this report represents, along with other vital grassroots and agency initiatives, moves us further toward that goal.

"If you have come here to help me you are wasting your time. But if you have come here because your liberation is bound up with mine, then let us work together."

-Lilla Watson, Aboriginal Artist and Activist

Glossary and Acronyms

Glossary

Environment: “Where we live, work, play, learn, and worship as well as the physical and natural world.” - Dr. Robert Bullard (<https://drrobertbullard.com/>)

Environmental benefits - Practices and aspects (things people do and parts) of the natural and social, and built environment that positively contribute to health, wellbeing, resilience and joy. Examples include access to desirable food, dignified housing, clean air and water, safe and welcoming green space. Green and built infrastructure that promotes mobility, accessibility and protection from the impacts of natural disasters and climate change, such as hurricanes, flooding and wildfires.

Environmental harm(s) - Practices and aspects (things people do and parts) of the natural and social, and built environment that put people and other living beings at risk, negatively affecting health, quality of life, and wellbeing. Examples include siting of polluting facilities, industries, and infrastructure (like major roads) that increase exposure to levels of air and water pollution, contaminated soil, and waste. Other examples include failure to protect people and the environment from those contaminants, and practices and decisions that have the effect of excluding or making it harder for certain groups or classes of people to access benefits and wellbeing. Environmental harms in the United States have been shown to be connected to systemic or institutional racism and poverty.

Environmental justice - “Environmental justice embraces the principle that all people and communities have a right to equal protection and equal enforcement of environmental laws and regulations.” - Dr. Robert Bullard

“Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.” -US EPA (epa.gov)

Environmental racism - “any policy, practice or directive that differentially affects or disadvantages (where intended or unintended) individuals, groups or communities based on race.” Dr. Robert Bullard

Equity, equitable - The term “equity” refers to fairness and justice and is distinguished from equality: Whereas equality means providing the same to all, equity means recognizing that we do not all start from the same place and must acknowledge and make adjustments to imbalances. - National Association of Colleges and Employers <https://www.naceweb.org/>

[also]

Equity, in its simplest terms as it relates to racial and social justice, means meeting communities where they are and allocating resources and opportunities as needed to create equal outcomes for all community members. - United Way of the National Capital Area (<https://unitedwaynca.org/blog/equity-vs-equality/>)

Fair treatment - In the Agency’s implementation of environmental justice, EPA has expanded the concept of fair treatment to include not only the consideration of how burdens are distributed across all populations, but also how benefits are distributed.

(<https://www.epa.gov/sites/default/files/2015-02/documents/team-ej-lexicon.pdf>)

Meaningful involvement - Meaningful Involvement means that: (1) potentially affected community members have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health; (2) the public's contribution can influence the regulatory agency's decision; (3) the concerns of all participants involved will be considered in the decision-making process; and (4) the decision makers seek out and facilitate the involvement of those potentially affected. (<https://www.epa.gov/sites/default/files/2015-02/documents/team-ej-lexicon.pdf>)

Most impacted communities (sometimes referred to as Frontline communities) - Those groups or places who experience more than their fair share of harms, and/or less than their fair share of environmental benefits.

Neighborhood walk, neighborhood walking interview - See Appendix 3 - Methodology

Per- and Polyfluorinated Substances (PFAS) - PFAS are a group of chemicals used to make fluoropolymer coatings and products that resist heat, oil, stains, grease, and water. Fluoropolymer coatings can be in a variety of products. (<https://search.cdc.gov/search/?query=pfas>)

Photovoice - See Appendix 3 - Methodology

Sited, siting - The process of deciding where to locate something, like a factory, facility, landfill, park, prison, school, or waste processing plant, and getting permissions and permits to do so.

Structural racism, systemic racism - Systemic and structural racism are forms of racism that are pervasively and deeply embedded in systems, laws, written or unwritten policies, and entrenched practices and beliefs that produce, condone, and perpetuate widespread unfair treatment and oppression of people of color, with adverse health consequences. They reflect both ongoing and historical injustices. Examples include residential segregation, unfair lending practices and other barriers to home ownership and accumulating wealth, schools' dependence on local property taxes, environmental injustice, biased policing and sentencing of men and boys of color, and voter suppression policies. [also]

Systemic and structural racism are forms of racism that are pervasively and deeply embedded in and throughout systems, laws, written or unwritten policies, entrenched practices, and established beliefs and attitudes that produce, condone, and perpetuate widespread unfair treatment of people of color. They reflect both ongoing and historical injustices. (Braveman and colleagues, 2022; <https://www.healthaffairs.org/doi/10.1377/hlthaff.2021.01394>)

Acronyms

ACT Bennington - Alliance for Community Transformations - Bennington (Non-profit organization)

ANR - Vermont Agency of Natural Resources (State Agency)

AOT - Vermont Agency of Transportation (State Agency)

BIPOC - Black, Indigenous, and People of Color

CAP - Community Action Partners

CVOEO - Champlain Valley Office of Economic Opportunity

CWC - Center for Whole Communities (Non-profit organization)

DEC - Vermont Department of Environmental Conservation (Department of ANR)

DUMP - Don't Undermine Memphremagog's Purity (civil society organization)

EJ - Environmental Justice (See definitions below)

EJ CE Environmental Justice Community Engagement

ENB Environmental Notice Board (DEC information tool)

EPA Environmental Protection Agency (U.S. Federal Agency)

HA - Housing Authority

LAP - Language Access Plan

LEP - Limited English Proficiency

NEK - Northeast Kingdom, region of Vermont made up of Essex, Caledonia and Orange Counties

NRCD - Natural Resources Conservation District

PEP - Permit Expediting Program (Program of the DEC)

PIP - Public Involvement Plan (EPA best practice tool)

PFAS - Per- and Polyfluorinated Substances

Per- and Polyfluorinated Substances (PFAS) The per-and polyfluoroalkyl substances (PFAS) are a group of chemicals used to make fluoropolymer coatings and products that resist heat, oil, stains, grease, and water. Fluoropolymer coatings can be in a variety of products.

RDI - Rights and Democracy Institute (Non-profit organization)

REJOICE - Rural Environmental Justice Opportunities Informed by Community Expertise Project

RPC - Regional Planning Commission

VLS EJ Clinic - Vermont Law School Environmental Justice Legal Clinic

The Environmental Justice Community Engagement (EJ CE) Team

Project Partner Organizations

Center for Whole Communities (CWC)

Center for Whole Communities works with organizations and initiatives in Vermont and across the country to cultivate transformative leadership that weaves together and strengthens movements for justice and the environment. Our Whole Thinking Practices – awareness, working with difference, dialogue, and story – and Whole Measures framework form the foundation of our approach to leadership development, holistic design and facilitation, and collaborative partnerships. We bring an ecological mindset, valuing principles of interdependence, emergence, and adaptation that guide and inform our work across networks, sectors, and ideologies. www.wholecommunities.org

Rights and Democracy Institute (RDI)

The Rights & Democracy Institute (RDI) was founded in 2016 to advance human rights and strengthen our democracy through grassroots organizing, transformative policy, and supporting the development of a new generation of leaders from rural communities across Vermont and New Hampshire. The majority of our work falls into two areas: advancing public policies that protect human rights; and leadership development. We work at local (municipal, school district), state, and federal levels. RDI's community engagement relies heavily on social movement theory of change. Using a broad array of "tools in the social movement toolbox," RDI runs strategic issue campaigns to: create concrete policy change in our communities; bring marginalized community members into leadership roles; and build a broader social movement within our states. www.radvt.org

Environmental Justice Clinic at Vermont Law School (VLS-EJC)

The VLS Environmental Justice Clinic strives to further the environmental justice movement by representing and partnering with environmentally overburdened communities of color and low-income communities. The EJ Clinic seeks to enforce civil rights in the environmental context, while providing technical assistance and sharing resources to develop and implement other legal strategies. To that end, the clinic trains students to be ethical and effective advocates for their clients while adhering to the Principles of Environmental Justice. Clinic Fellows and student clinicians participate in the Rural Environmental Justice Opportunities Informed by Community Expertise (REJOICE) project, which conducts outreach to communities and stakeholders throughout Vermont in order to recommend environmental justice policy to the state. <https://www.vermontlaw.edu/academics/clinics-and-externships/environmental-justice-clinic>

Environmental Justice Community Engagement Team Members

Project Leader; Design, Coordination and Implementation

Britaney Watson attended the University at Albany where she received a Bachelor's degree in Public Policy with a concentration in Public Sector Economics and a minor in Psychology. Determined to effect change within the foster care system, she spent six years serving children and their families as a caseworker and a supervisor. Following the tragic death of George Floyd, she joined a racial equity work group, which ignited her passion to be an advocate for the BIPOC community. She now serves as the Environmental Justice Chairperson for the Rutland NAACP branch and the Social Justice representative for the EJ Advisory Council and is dedicated to providing advocacy and support around racial justice, equity and discrimination. She is an empathetic leader with sincere interest and skill in learning about and assisting others to share their stories. She believes in the value that stories bring and their power in impacting important decisions.



Britaney Watson,
Environmental Justice
Community Engagement
and Network Coordinator,
CWC and RDI;
Project Leader, Design,
Coordination and
Implementation



Jennifer Byrne, VLS EJ
Clinic; Project Community
Legal Education

Jennifer Byrne is the Director of the White River Natural Resources Conservation District, a citizen-led, local unit of government developed in 1939 to protect natural resources and implement conservation on the local level. From 2011-2016 Jennifer worked and volunteered for the USDA-Natural Resources Conservation Service (NRCS) in over 15 states, comparing targeted conservation efforts and local and regional water quality improvement programs by assisting with conservation planning, rural and urban soil surveys, wetland delineations, tree plantings and monitoring, and engineering surveys. From 2019-2022 she was an Environmental Masters Fellow in the Environmental Justice Clinic at Vermont Law School working on the REJOICE project. Jennifer holds a Master of Environmental Law and Policy from Vermont Law School, a B.S. in Agriculture Science from Oregon State University, and an A.A.S. in Alternative Energy Technology from Lansing Community College.



Dan Fingas joined RDI after spending 5 years as the Organizing Director for the Long Island Progressive Coalition, a regional community organization committed to fighting for social, racial, and economic justice. Dan started his career organizing in Michigan. There he worked as a political and internal organizer for the Michigan Laborers District Council, as the Hospital Organizing Coordinator for SEIU Healthcare Michigan, as a Community Organizer for Michigan Organizing Project, and in several political organizing roles, including as a Campaign Manager for State Senate. Dan is a 2004 graduate of Albion College and has been married to wife Mo Lynch since 2015.



Dan Fingas, Vermont
Movement Politics Director,
RDI; Project Consultation



Grace Gershuny has made the NEK her home since 1973. She is an educator, trainer and the author of *Organic Revolutionary: A Memoir of the Movement for Real Food, Planetary Healing, and Human Liberation*, now in its third edition. An organic farmer, writer, and leader in the organic farming movement, she is the author of books and articles on soil management and composting. She was editor of the *Organic Farmer: The Digest of Sustainable Agriculture*. She serves on the faculty of the Institute for Social Ecology.



Grace Gershuny,
Northeast Kingdom
Community Liaison



DeShawn Hamlet,
Bennington Community
Liaison

DeShawn Hamlet was born and raised by his mother in Hartford Vermont in low-income housing. DeShawn provides turkey meal kits annually to 25+ families for Thanksgiving and holds an annual toy drive for Christmas in Bennington. DeShawn owns and operates *Battle of the Future: Dreams to Reality*. This program provides strength, conditioning and skills training and is available for all ages. “The most pressing Environmental Justice issue in Bennington is not enough help for the BIPOC and low-income [communities].”



Riziki Kassim is a Muslim woman of color from the Somali Bantu community who came to the United States in 2006 through the Vermont Refugee Resettlement Program. Riziki co-led an international fundraising effort that provided food to more than 300 families in Kakuma, Kenya during Ramadan. Her efforts were covered in a [story on VPR](#). She shares, “The most pressing environmental justice issue in my community is the language barrier (information not being translated in people’s native language); and basic necessities (living in a crowded home, relying on 3 Squares and not being able to afford heat and electricity).”



Riziki Kassim,
Burlington-Winooski
Community Liaison



Susannah McCandless,
Special Projects Manager,
CWC; Project
Administration, Design
and Engagement

A political ecologist, Dr. **Susannah McCandless** holds degrees in Geography, Biology, Francophone and Latin American studies. After college, she accompanied smallholder Costa Rican farmers, who raised questions about conservation-as-usual. Back on unceded Western Abenaki territory, she studied labor and access in Vermont’s iconic working landscapes. She still collaborates with farmworkers, whose grassroots advocacy changed terms of access, mobility, and self-determination in the state. A Fulbright Scholar, Ford Community Forestry and Switzer Fellow, Susannah taught at University of Vermont and Mount Holyoke College. She has worked on land and food sovereignty, community forestry, ethnobiology, environmental justice, migrant labor, and community health. In her previous role with Global Diversity Foundation, she supported Indigenous- and community-led initiatives and co-organized convenings to strengthen connection, resilience and wellbeing. Susannah is committed to strengthening viable landscapes and dignified livelihoods.



Ginny McGinn (she/her) is a mother, artist, and nonprofit leader. Throughout her career, she has been deeply involved in the work of social and organizational change and in building partnerships across lines of power and privilege. Ginny has a profound interest in how change happens, from the level of individual transformation through the level of entire communities or systems, and it is this process of change that she seeks to continue to study and facilitate in her leadership at Whole Communities. Cultivating practices that support whole communities (lower case intended) and bringing those practices into our daily lives is the focus of her current work. Ginny facilitates and consults on organizational change around the country, using the Whole Thinking Practices and the tools she and her colleagues have helped evolve at Center for Whole Communities.



Ginny McGinn, Executive Director, CWC; Project Strategy and Oversight



Kiah Morris, Executive Director, RAD; Project Consultation

Kiah Morris served in the Vermont general assembly as a State Representative from 2014-2016 and 2016-2018. She is the first African-American and person of color elected from Bennington County and the second African-American woman to be elected to the legislature in Vermont history. She helmed the historic establishment of board and cabinet-level, director position to address systemic racism in state government; the establishment of the most comprehensive ethnic and social equity in schools bill in the nation and medical monitoring for victims of corporate pollution. In addition to her leadership of Rights and Democracy, Kiah is an award-winning, in-demand trainer, speaker and presenter. She sits on the Board of United Children's Services, is a Sisters on the Planet Ambassador for Oxfam America and is on the advisory councils for Emerge Vermont and Black Lives Matter Vermont.



Michael Weiss is a young organizer with a deep commitment to making systemic change. While studying Sustainable Development at Appalachian State University in the mountains of North Carolina, Michael helped create an environmental justice organization, where he worked for 3 years. Michael is also an advocate for cooperatives and the solidarity economy, working in agriculture and housing sectors to create an economy that benefits and is owned by workers and our communities. Michael sees all of his work as an effort to distribute power and build systems of radical democracy in all parts of our communities.



Michael Weiss, Environmental Justice Organizer, RDI; Project Outreach



Methodology

Approach

Our methodology integrated RDI's tactics of door-to-door canvassing, virtual or in-person community meetings, one on one conversations, and public events with Center for Whole Communities' (CWC) facilitation expertise and use of [Whole Measures](#), a planning and evaluation framework for program design engaging communities in imagining and defining success collaboratively. CWC and Rights and Democracy Institute (RDI) built on existing engagement, research and policy work carried out by REJOICE, including survey tools, mapping, and community engagement work to understand environmental justice impacts across the state. We received technical and community legal education assistance from and shared resources with the VLS EJ Clinic, another REJOICE member. We collaborated with the DEC monthly and as needed to iteratively share learning around our ongoing work. We strove to hold community leadership development at the core of our outreach efforts, in which community members were supported to build their capacity as leaders and grassroots organizers. We learned from, trained and invited members of the communities to co-design and carry out this work with us.

The EJ CE team approached this work by forming our partnership and creating agreements outlined in an MOU between our organizations, and jointly interviewing and hiring selecting the Environmental Justice Community Engagement and Network Coordinator (EJCENC), Britaney Watson. After an initial day-long planning session, our EJ CE team met for at least an hour each week to continue to build relationships and to discuss, plan and support the EJ work. Members of the team set weekly, bi-weekly, and monthly meetings outside of EJ CE team weekly meetings as necessary to continue to build on the work.

More detail about our approach can be found in the [Pilot EJ Community Engagement Plan 2022 for the VT DEC](#) developed December 2021. Our plan was informed by legal research on engagement plans around the United States, the [Community Engagement Plan Research Memo](#) prepared by the VLS EJC Clinic team in Fall 2021. Our overall engagement process was informed by EJ CE team members' previous and ongoing engagements, adrienne marie brown's *Emergent Strategy*, Rosa Gonzalez's [Spectrum of Community Engagement to Ownership](#), and Kiah Morris's [Guiding Principles for a Just Transition](#), created in engagement with the Vermont Climate Council, as well as CWC's Whole Measures. At each site where we engaged, the EJCENC invited two community members or leaders to provide written feedback on the community-specific plan and met with them to discuss their input.

Use of information gathered

Knowledge presented in this report was co-produced with communities. Within the limited scope of this contract, the EJ CE team learned about environmental injustices, potential and existing harms communities face, and the need to make government and other relevant actors aware of how issues are playing out in place. Throughout this process, we took initial steps and supported community members in building connection with one another to seek resolution, relief or improvement where possible. We did not promise to fix things, but we committed to relay concerns and where possible to follow up in specific ways. We listened, made records of what we heard, made what was shared anonymous unless people wished to have their name or their identifying details included, and checked back to see if we had heard and understood correctly whenever possible.

Engagement practices

We upheld the principles of meaningful participation in each community. We worked with liaisons and trusted organizations to determine event format and location. We offered participant compensation, childcare upon request, food, and times that were accessible, then checked residents' impressions of how arrangements worked, both with participants and in subsequent rounds of outreach. We provided different payment options for community members including CashApp, Venmo, Zelle, check and cash.

Engagement tools

Our team consulted with Dr. Bindu Panikkar and Dr. Ingrid Nelson, REJOICE members and professors who work on Environmental Justice, community engagement and social science at the University of Vermont Rubenstein School and Department of Geography. We agreed on the importance of being creative in how we collected data, desiring to collect data in a way that is both engaging and inspiring. This approach resulted in our team avoiding traditional data collection methods such as surveys and questionnaires. We recognized that where interviews and engagement take place mattered and found the need to be strategic in where information was collected and the sequence of engagement methods. We asked ourselves, what knowledge do we already have, what do we need, who does it belong to, with whom will we share it? Together we created a list of potential methods to be used to engage communities and agreed on framing questions in a way that is empowering. The methods decided on are centered in fostering a process of conversation, and story-building. Our goals are to build trust and momentum toward a more accessible, just, meaningful and inclusive participation in the decision and actions of (especially) State government agencies. The methods used for meaningful participation were neighborhood canvassing, neighborhood walking open interview, neighborhood mapping, neighborhood network diagramming, photovoice, coffee hour, and open-ended questions in focus group or community sessions. Descriptions of these methods follow a summary presented in Table 1, below. Methods that were considered, but ultimately not used in the present outreach were asking participants to keep a health diary, and surveying community liaisons.

Table 1: Engagement methods considered.

Potential methods	Timing	Purpose
One-to-One Conversations (targeted interviews)	Throughout	To inform and support the development of an outreach plan that will serve community needs, as well as to test learning during the course of an engagement process.
Community meetings	all stages	Build relationships, assess concerns
Neighborhood walking open interview	early/mid	Perspective on community experiences of a site - ground truthing
Photo voice (taking, uploading pics w/ descriptions)	mid and late	Document non-dominant perspectives, experience of place, harms, benefits
Health diary (notes daily x 2 weeks)	mid	Document individual experiences of env. harms, identify potentially shared ones
Survey or in-depth interviews of community liaisons	early/post	Gain contextual understanding of communities, barriers and issues to be engaged, next steps

One to One Conversations - Planning phase

The EJ CE Coordinator held individual conversations (semi-structured interviews) with DEC personnel and other key knowledge-holders across Vermont and in selected pilot engagement communities.

Neighborhood canvassing

This is a systematic approach to interviewing residents, and others who frequently spend time in the community. To understand how a community relates to their environment, it is crucial to gain some context. Gaining familiarity with a place in an embodied and personal way can significantly aid in one's understanding of the place and peoples experiences interacting with these places.

In Rutland, one EJ CE team member delivered flyers and explored neighborhoods, riversides, bus stops, food shelves, and more by walking and skateboarding. This gave our team member familiarity with streets, neighborhoods, underpasses, green spaces and their relationships to each other. This familiarity added color and context to the conversations and comments shared by community members during our later meetings.

Neighborhood walking open interview

This ongoing process of inquiry with the community is a walking group interview technique, where up to 8-10 community members walk through a neighborhood, commenting on harms, benefits, concerns, and desires for shared spaces.

Neighborhood mapping

We used this participatory mapping technique, as an immediate follow-up to neighborhood walks. In response to topics that came up on the walks and a series of prompts, youth and adult participants placed their observations, concerns, needs and desires for the neighborhood on a large map of the neighborhood, which can then be shared as a basis for further discussion, identifying shared priorities, or planning for action. Different base map views (satellite, roads and buildings, hand-drawn) and labeling materials (pins, post-its, markers, overlays) promote different kinds of shared learning.

Photovoice

Invites participants to respond to prompts to make and share images (photos and/or videos) of positive and negative environmental aspects of their neighborhoods and communities by photographing them, captioning those photos, and uploading them to a shared repository. This is a combined visual and written storytelling technique, which works to build a visual culture, share examples, and get people listened to.

Open-ended questions in focus groups or community sessions

Following convening and community organizing practices established by Center for Whole Communities, Rights and Democracy Institute, and other REJOICE partners such as Slingshot Action, meetings were convened after targeted outreach in accessible language, media and locations, in a setting readily accessible to and welcoming to members of a community or group. Meetings encouraged co-creation of knowledge by promoting listening over organizers' talking, creating a well-facilitated, welcoming, engaging space of dialogue and shared inquiry.

Coffee hour

An informal drop-in opportunity to assess topics and themes of interest. Held in an easily accessible neighborhood space—for example, the community room of a mobile home park—at a convenient time for residents, offering coffee and pastries, and the opportunity for open-ended conversation on environmental issues of interest and concern to residents and the convenor.

Participant Compensation Table

Vermont DEC Community Engagement Team Contract #41825, 2021-2022

Participant category	Compensation	Notes
Knowledge-holder	\$100/interview or conversation	Honorarium, if not well-compensated by virtue of their paid work
Community liaisons	\$50/hour	For ongoing/collaborative work
Language professionals	\$60-80/hr	Depending on agency rate (AALV, USCIS, ASL interpreters)
Focus group participants	\$50/person	Based on a 90-minute meeting
Community meeting participants	\$20-\$40/person	1-2 hour meeting, +/- childcare, refreshments/a meal, interpretation
Survey respondents	\$10-\$20	Online, phone, mailed or in-person survey, depending on length
Other costs: childcare, meals, transportation	variable	Generally only for in-person engagements

Provenance: This model was developed by Center for Whole Communities and representatives of Rights and Democracy Institute and the Vermont Law School EJ Clinic. The Vermont Department of Environmental Conservation approved its use in community engagement. It is based on a compensation model tested statewide by the Rural Environmental Justice Opportunities Informed by Community Expertise (REJOICE) Coalition in 2019-2020 for in-person community meetings, consultations, & on-line focus groups. REJOICE members endorsed that precursor model; multiple Vermont-based funders supported elements of it.

Rationale: The people and groups who directly experience environmental injustices or harms, and who are working to resolve and correct those harms are overburdened. They face heavy and intersecting burdens on their time, resources, finances; responsibilities to work, family and community; to their own health and wellbeing and that of the lands and waters they tend. They also hold key understandings of how existing systems impact individuals and communities. As such, any effective policy, planning and action must take into account their knowledge and expertise, based in place, experience, and community. Doing so respectfully means compensating people who choose to share their knowledge at a professional rate, one that recognizes how rarely knowledge-holders are well-paid, securely salaried or offered benefits for their community-centered work. It means that those closer to power and resources go out of their way to meet collaborators where they are: with meaningful compensation, in welcoming spaces, in co-created, accessible language, moving at the rate of trust to devise equitable solutions together.

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