

**Public Meeting of the Vermont Interagency Environmental Justice (EJ) Committee
(IAC)
Hybrid Meeting Minutes
November 17, 2025**

Note to reader: These draft minutes were compiled by staff from the Agency of Natural Resources. If you would like to see any changes to these draft minutes, please reach out to anr.ejcoordinator@vermont.gov

Meeting Information:

Date: November 17, 2025

Meeting Time: 12:00 PM to 3:00 PM EST

Attendees:

Advisory Council (AC): Trey Martin, Jennifer Byrne, Mariana Sears, Britaney Watson, Victor Davila, Walter Brownridge, Xusana Davis

Interagency Committee (IAC): Karla Raimundi, Dave Pelletier, Abbey Willard, Jenny Ronis, Elizabeth Schilling, Claire McIlvennie, Amy Redman, Grace Vinson, Stephanie Smith, Xusana Davis

State of Vermont: Juliet Birch, Kim Barrett, Sarah McIlvennie, Collin Smythe

12:00 PM

Welcome & Introductions

- Consent to [Community Agreements](#)
 - Consent received, no comments.
- Approve [November 12, 2025 Meeting Minutes](#)
 - Minutes approved, no comments.
- Approve November 17, 2025 Agenda
 - Agenda approved, no comments.

12:10 PM

Orientation to Cumulative Environmental Burden Rulemaking and Q and A (two sections from agenda blended)

- Kim B.: Introduces Rachel Stevens, Associate General Counsel from the Agency of Natural Resources
- Rachel S.: Describe what the EJ Law says about Cumulative Environmental Burden Rulemaking and provide a brief introduction to prepare for future work
- Rachel S.: A Rule has the force of law – Rulemaking is the process of adopting or amending a rule, usually provides additional details on how a rule should be applied
- Rachel S.: To adopt a rule, there is a description in the Vermont Administrative Procedure Act. The EJ Law, in addition, has additional requirements for the Cumulative Environmental Burden Rule. Interagency Committee on Administrative Rule (ICAR) and Legislative Committee on Administrative Rule (LCAR) review the rulemaking process and the rule itself
- Rachel S.: Role of the AC in this work – AC must be consulted prior to drafting to discuss scoping and proposed content. AC can review and comment on draft rulemaking concepts. AC will be notified before the proposed rule is submitted to ICAR. AC can vote and record individual members' support or objection to the proposed rule, votes will be filed with ICAR
- Rachel S.: Role of the IAC – consult the AC, early input is important. Once ANR adopts the rule, other covered agencies will have one year to adopt the rule. ANR must adopt by July 1, 2027. Other covered agencies must conform by July 1, 2028.
- Rachel S.: Reviews Vermont EJ Policy – 3 VSA Section 6003
- Grace V.: "each agency probably has their own policy/process for updating documents/policies/procedures- how is that being accounted for in the 1 year deadline?"
- Rachel S.: This is not accounted for in the 1-year deadline, but we should continue to discuss in an IAC meeting
- Rachel S.: Reviews the Law's language around what the Cumulative Environmental Burden Rule is expected to achieve
- Rachel S.: Reviews the Law's timeline and requirements for the Cumulative Environmental Burden Rule. Consideration refers to incorporation in decision-making, but is not necessarily defined. What we mean by "consideration of cumulative environmental burdens" will be discussed further in a scoping meeting, which will come in the future. Today's meeting is introductory only and we will continue this discussion in other public meetings!
- Rachel S.: The first goal of this deliverable is to define "cumulative environmental burdens". The Law already defines "environmental burdens" but now we need to determine what "cumulative" means.
- Rachel S.: Lots of other states have done this work, and there is a database of all of these examples that Rachel will share. Biden administration definition was

“Total burden of exposure to combinations of multiple stressors and their effects on health, wellbeing and quality of life.” Examples could be:

- Exposure to multiple environmental burdens or sources of pollution
- Exposures to multiple pollutants
- Pollution burdens and social vulnerability
- These are only examples from other states. We will continue to discuss as public bodies in further meetings.
- Britaney W.: Is there opportunity to prioritize burdens?
 - Rachel S.: This is certainly a topic on the table. The use of the word “significant” in the environmental burdens definition allows us to explore this
- Grace V.: Social vulnerability framework from VDH could be a helpful resource. Have we thought about what information to use to determine the burdens? State framework?
 - Rachel S.: This is an important consideration, especially for the Mapping Tool
 - Karla R.: The Mapping Tool RFPs ask the contractor to assess pre-existing tools, such as the Social Vulnerability Index, to support informed development of the tool
- Rachel S.: The rule will require covered agencies to consider cumulative environmental burdens and adopt or amend policies and procedures, etc. to implement this chapter (deadline July 1, 2028 for covered agencies)
- Rachel S.: The rule will impact the public by informing how the agencies consider cumulative environmental burdens and use the Mapping Tool, including burdens that impact the public – ensuring that burdens are not felt disproportionately throughout the state.
- Mariana S.: “cumulative burdens are currently not considered already in any way / law?”
 - Rachel S.: Actually there are many existing ways where cumulative impacts are considered. ANR is trying to inventory these places where cumulative impacts are relevant. This rule will broaden the applicability of consideration of cumulative environmental burdens to apply to more decisions than it already does.
- Britaney W.: How will these burdens be made public and accessible for public to view?
 - Rachel S.: The Environmental Justice Mapping Tool will publicly map environmental burdens, but it still remains to be seen how the mapping tool could depict cumulative burdens. CalEnviroScreen and EPA EJScreen are interesting pre-existing tools that show examples of how this work is already being done.

- Karla R.: Unclear if this will be one of the things that can be done with the tool. But at minimum, the burdens that make it into the tool can be layered in map layers. This is a way to glean cumulative burden even if we do not have a formal cumulative burden assessment report
- Jennifer B.: Permits in the context of data collection of burdens – having the EJ Mapping Tool depict all permits across the state could be helpful.
 - Rachel S.: The New Jersey EJ Mapping Tool primarily identifies permits throughout the state. This is definitely a consideration for Vermont.
- Claire M.: Are there examples of time scale over which burden is experienced? Factoring in historical or ongoing burden exposure?
 - Rachel S.: This has been an ongoing discussion internally. There is not guidance in the EJ Law on this, but we should definitely discuss timescale when considering what constitutes as cumulative
- Abbey W.: Has there been an effort to potentially capture cumulative impact across agency efforts? How does the Mapping Tool fit in here?
 - Rachel S.: Cross-agency impacts is an interesting concept. The Land Use Review Board may be a good resource here.
- Karla R.: Next steps: Get familiar with the deliverable and ask questions. CREJU will host technical assistance sessions with AC and IAC to help get people comfortable with this topic in time for the scoping conversations (next year). AC members please share important values and items you'd like to see folded into the rule.
 - Rachel S.: There will be a formal scoping meeting with the AC and IAC. This is just an introductory conversation. Materials will be circulated in advance of a scoping meeting.
- Abbey W.: "I feel that each of those TA sessions needs to include our legal counsel from each covered agency. They would benefit from this level of presentation during those sessions as well"
 - Rachel S.: Having the legal counsel of each agency get together would be great. We can think about how to organize and facilitate that.
- Karla R.: AC can ask for tailored support prior to scoping to get connected and familiar with the material as needed.

1:05 PM

Public Comment

- No comments

1:10 PM

Break

1:15 PM

ANR Recaps Executive Sessions

- Rachel S.: Recaps what the purpose and requirements of executive session are according to the Open Meeting Law. This could be a useful tool to have a conversation about legal issues related to the environmental justice focus population definition in a confidential setting.
- Rachel S.: Describes procedure for entering into executive session.
- Jennifer B.: Why is the executive session being proposed warranted?
 - Rachel S.: To further discuss legal issues related to the EJFP definition in a confidential setting.
 - Jennifer B.: Why can't this be talked about publicly?
 - Rachel S.: Discussing the information publicly could make the EJ Law vulnerable to legal challenge.
- Rachel S.: This conversation pertains to confidential topics that are considered attorney/client privileged conversations. ANR legal counsel would like to provide legal information to AC and IAC. If, after executive session, you believe this information should be made public, this can be discussed with ANR legal counsel.

1:20 PM

AC and IAC Deliberate and Vote on Entering into Executive Session

- Mariana S.: Moves to bring AC into Executive Session: I, [name], move to enter into Executive Session for the purpose of discussing confidential legal information with an attorney pursuant to 1 V.S.A. Section 313(a)(1)(F). The Executive Session will be limited to discussing the definition of Environmental Justice Focus Populations (EJFP) and associated legal issues with an attorney. Sharing this information with the public prematurely will put the AC and IAC at a substantial disadvantage because they need to understand confidential legal risks to implement the EJ Law. I move for ANR staff, including attorneys, to be present.
 - Trey M.: Second
 - Vote: 5 of 6 present AC members present voted yes. 1 no vote.

- Dave P.: Motion
 - Abbey W.: Second
 - Vote: 9 of 9 IAC members present voted yet.

1:30 PM

Executive Session Begins or Joint Public Meeting Ends

- The public bodies entered into Executive Session. This section of the meeting is closed to the public. This section of the meeting will not be recorded. Minutes were not taken.

3:00 PM Close Out