May 18, 2026

To: Members of the Vermont General Assembly
Re: Community Engagement Funding and Environmental Justice Implementation in S.325

Dear Members of the Legislature,

The Environmental Justice Advisory Council (EJAC) appreciates the Legislature's continued work on S.325 and the ongoing conversations about land use, housing, conservation, natural resources, and public participation in Vermont.

We write to encourage the Legislature to view any proposed community engagement planning funding this session as an opportunity to strengthen the Environmental Justice implementation work already underway across State government under 3 V.S.A. chapter 72.

At its core, **environmental justice is about how decisions are made, where projects and development are located, and who is included in those decisions**. Questions about land use, siting, housing, infrastructure, conservation, transportation, and public health are all connected to community voice, access to decision-making, and the long-term stewardship of place.

The Environmental Justice Law of 2022 already created a statewide structure to improve how State agencies engage with communities. That work is happening now.

The Environmental Justice Advisory Council (EJAC) and the Interagency Committee on Environmental Justice (IAC) have been meeting regularly for several years to implement Vermont's Environmental Justice Law across State government. **This work has made meaningful progress, particularly given the scale of the task: coordinating long-term systems change across more than 10 State agencies while building new approaches to community engagement, public participation, and interagency coordination.** That work is necessarily iterative and takes time. While the Agency of Natural Resources has dedicated staff supporting implementation, the Council itself has operated with very limited direct resources despite its significant responsibilities under the law.

The Environmental Justice framework already includes rural voices, conservation perspectives, and a broad range of community representation. The Environmental Justice Advisory Council was intentionally created by the Legislature to include representatives from:

- municipal government;
- social justice organizations;
- mobile home park residents;
- environmental justice focus populations;
- food security organizations;
- immigrant communities;
- statewide environmental organizations; and

- State-recognized Native American Indian tribes.

The Council also includes representation from:

- the Vermont Housing and Conservation Board;
- the State Natural Resources Conservation Council (Conservation Districts); and
- the Office of Racial Equity.

Likewise, the Interagency Committee on Environmental Justice brings together representatives from:

- the Agency of Natural Resources;
- the Agency of Agriculture, Food and Markets;
- the Agency of Commerce and Community Development;
- the Agency of Transportation;
- the Agency of Education;
- the Department of Health;
- the Department of Public Safety;
- the Department of Public Service;
- the Public Utility Commission;
- the Land Use Review Board; and
- the Office of Racial Equity.

Together, these structures were intentionally created to support coordination between agencies, communities, and local expertise within one statewide process.

The EJAC, the IAC, and ANR are currently meeting weekly through a subcommittee process to develop a statewide guidance document for community engagement planning. This work builds on the Core Principles for Community Engagement developed under 3 V.S.A. § 6006 and is intended to help agencies carry out the law in a practical and consistent way.

These covered agencies are required under the law to develop community engagement plans, and the guidance document currently being developed is intended to help make those plans meaningful, accessible, and consistent across government.

Importantly, S.325 is also currently proposing changes to Environmental Justice implementation timelines and deadlines. Because the Legislature is already revisiting those timelines, we believe any community engagement planning funding considered this session is directly connected to, and should support, the implementation work already in motion through the Environmental Justice Law.

If Vermont is going to invest public funding in community engagement this session, we respectfully encourage that the funding support this broader statewide effort rather than creating a separate or overlapping process.

Using the funding this way would:

- support implementation of the Environmental Justice Law already enacted by the Legislature;
- strengthen community engagement practices across State government;
- support meaningful engagement with communities across Vermont;
- improve coordination between agencies, local communities, and existing public institutions;
- support engagement around land use, housing, conservation, climate resilience, and infrastructure together rather than through disconnected processes; and
- create long-term systems change rather than another short-term planning exercise.

We believe Vermont is at an important moment. Significant implementation work has already begun through the Environmental Justice Law, including development of the Environmental Justice Mapping Tool and future community engagement efforts connected to that tool. Supporting the current guidance and implementation work now would help ensure those future efforts are grounded in strong engagement practices and meaningful public participation.

Importantly, this approach would also provide meaningful support for engagement work already being carried out by the Environmental Justice Advisory Council and Interagency Committee, rather than creating separate processes competing for limited time, funding, and public attention.

The guidance document currently being developed is intended to give agencies practical tools for improving how they engage with Vermonters across rulemaking, permitting, grantmaking, land use, public meetings, and other decision-making processes.

The guidance focuses on helping agencies identify impacted communities early, improve accessibility and plain language communication, reduce barriers to participation, coordinate engagement across agencies, avoid repeatedly overburdening the same communities for feedback, and build stronger systems for responding to and incorporating public input into decision-making.

The Environmental Justice Law envisioned ongoing, meaningful, and accessible public participation in State decision-making. **The work currently underway is focused on helping agencies move beyond one-time hearings and toward more durable and community-informed engagement practices across government that do not continue to place the burden of participation on the same overburdened communities again and again.** The goal is to build systems that make participation more accessible, coordinated, and meaningful, while respecting people's time, capacity, and lived experience.

We encourage the Legislature to build upon that existing work and ensure that any community engagement investments made this session strengthen the statewide Environmental Justice implementation framework already established in Vermont law.

Thank you for your consideration and for your continued commitment to meaningful public participation in Vermont.

Sincerely,

Vermont Environmental Justice Advisory Council