

Environmental Justice in Fenceline Communities in Virginia

Analysis for Dominion Energy
by Claire Geith

Master of Public Policy candidate at University of Virginia



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Disclaimer

The author conducted this study as part of the program of professional education at the Frank Batten School of Leadership and Public Policy, University of Virginia. This paper is submitted in partial fulfillment of the course requirements for the Master of Public Policy degree. The judgments and conclusions are solely those of the author, and are not necessarily endorsed by the Batten School, by the University of Virginia, or by any other agency.

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Honor Pledge

On my honor as a student at the University of Virginia, I have neither given nor received unauthorized aid on this assignment.

A handwritten signature in black ink, reading "Claire Leith". The signature is written in a cursive, flowing style with a large initial 'C' and 'L'.

Glossary

Fence line: means an area that contains all or part of a low-income community or community of color and that presents an increased health risk to its residents due to its proximity to a major source of pollution (*Code of Virginia Code - Article 12. Virginia Environmental Justice Act, 2020*).

Environmental Justice (EJ): means the fair treatment and meaningful involvement of every person, regardless of race, color, national origin, income, faith, or disability, regarding the development, implementation, or enforcement of any environmental law, regulation, or policy (*Code of Virginia Code - Article 12. Virginia Environmental Justice Act, 2020*).

Virginia Environmental Justice Act (VEJA): Passed in 2020, lays forth the Commonwealth's definitions for EJ and fence line communities (*Code of Virginia Code - Article 12. Virginia Environmental Justice Act, 2020*).

General Assembly (GA): The state government in Virginia which consists of the Senate and the House of Delegates.

Executive Summary

The Commonwealth of Virginia does not coordinate environmental justice effectively, exacerbated by fragmented efforts that fail to protect communities disproportionately impacted by pollution. The lack of a centralized approach and a broad, ambiguous definition of EJ create inconsistencies throughout state agencies and private corporations, furthering environmental and health inequality. Fence line communities, the areas directly affected by increased pollution, are frequently left out of the decision-making processes, leaving them without a voice in shaping policies that directly impact EJ communities. To develop an effective strategy, the main question remains: Who needs to take action to improve environmental justice governance in Virginia, and how can policy changes ensure equitable outcomes?

To address this issue, first this report will complete a background and review existing evidence to provide information on what environmental justice and fence line communities are, Dominion Energy's role in the current system, and how meaningful change can happen in Virginia. The report will address the impacted parties and potential challenges as well as discussing examples of successful approaches from across the United States and the lessons learned from research. To address the issue of environmental justice in Virginia, this report offers the following three alternatives as potential courses of action by Dominion Energy:

- 1) Strengthening the Virginia Council on Environmental Justice
- 2) Support Increased Community Engagement
- 3) Support a Mandate System on Councils

This report evaluated the alternatives to the criteria of effectiveness, administrative feasibility, political feasibility, cost, and equity for fence line communities. Ultimately, it is recommended by this paper that Dominion Energy follow Option 3: Support an EJ Mandate for Councils Across Virginia.

Problem Statement

The lack of coordinated state government action, exacerbated by a broad definition of Environmental Justice in Virginia, hinders effective support for communities disproportionately impacted by pollution. This ambiguity leads to fragmented efforts from private and public institutions, weakening protection for affected populations. Furthermore, the exclusion of fence line communities from decision-making processes prevents those most affected from having a voice in policies that shape their environment. *Without structural changes from both public and private actors to ensure meaningful EJ representation and accountability, responses will continue to be disjointed and ineffective in addressing environmental injustices.*

Introduction

Throughout the United States, the most vulnerable communities often face disproportionate impacts from the development of projects such as energy production facilities, mining or resource extraction areas, and waste management sites. In 1994 President Clinton, issued Executive Order 12898 on Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations, establishing a federal definition of EJ (United States Commission on Civil Rights, 2003). The Environmental Protection Agency (EPA) defined environmental justice as “the just treatment and meaningful involvement of all people, regardless of income, race, color, national origin, Tribal affiliation, or disability, in agency decision-making and other Federal activities that affect human health and the environment” (EPA, 2014). However, this definition was contingent upon political support at the federal level and is subject to change with different administrations. Under the Trump Administration’s Executive Order known as "Ending Illegal Discrimination and Restoring Merit-Based Opportunity," the EPA’s EJ definition was removed as of January 2025 (*Ending Illegal Discrimination And Restoring Merit-Based Opportunity*, 2025).

Virginia faces a variety of EJ challenges across the state, with 29 sites listed as Superfund sites under the EPA’s National Priorities List (NPL) as seen in Figure 1. These areas pose serious risks to public health and require remediation (US EPA, 2015). Addressing these challenges requires not only a structured policy response, but action from both the public and private sector.

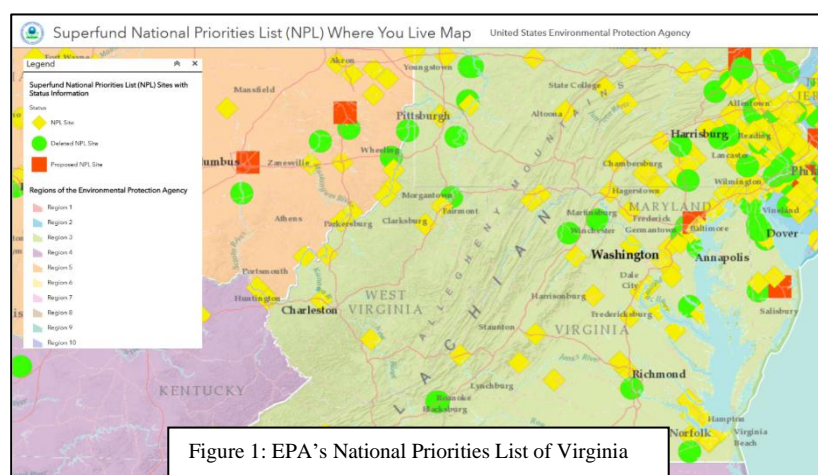


Figure 1: EPA’s National Priorities List of Virginia

Client Overview

My client is the Environmental Justice Division at Dominion Energy. The Environmental Justice Team's role is engaging with community members and various stakeholders throughout new development projects. Dominion Energy is Virginia's largest utility provider and has a natural monopoly to provide residents across the state with reliable energy.

In Dominion Energy's 2024 Integrated Resource Plan (IRP), the Environmental Justice plan spanned Chapter 7 clarifying the way that Dominion Energy engages federal, state, local and tribal stakeholders to mitigate environmental impacts through the required permitting, approval, or consultation processes. (*IRPs / Dominion Energy*, 2024).

Currently Dominion Energy provides energy through 17 different natural gas, coal, or petroleum sites (*Power Stations / Dominion Energy*, 2024). Dominion Energy is undergoing expanding renewable energy sources across the Commonwealth with development of offshore wind and small modular reactors being in the beginning stages (Wolfe, 2024).

Dominion Energy's Environmental Justice Team has a unique position to make a stance on EJ that prioritizes the utility company engaging with the community in a beneficial way. The EJ Team has the power to shape policies statewide that acknowledge the benefits of listening to the stakeholders while providing a service, while also acknowledging the need for an actionable definition of EJ from the state government. With Dominion Energy's position as a natural monopoly in the state providing energy, the importance of engaging with the different levels of stakeholders is critical to bettering the corporation in the local communities they reside in.

Background

The movement surrounding environmental justice has a long history with roots tying back the civil rights movements. The inequities seen have prompted environmental justice advocates and grassroots organizations to fight for fairer policies and practices since the 1980s (Office of Legacy Management, n.d.). The first state to pass legislation on environmental justice was California in 1999 (Chiu, 2013).

Enforcement of the Clean Air Act reveals disparities in the implementation, which tends to increase in predominantly African American communities but declines in areas with high proportions of poor and Hispanic populations, underscoring the nuanced challenges faced by EJ communities (Konisky, 2009). These findings demonstrate the complexity of addressing pollution within specific EJ populations.

Legislation in Virginia on codifying environmental justice into law passed in 2020 with the General Assembly putting forward the Virginia Environmental Justice Act. The Virginia Environmental Justice Act reads that it is "It is the policy of the Commonwealth to promote environmental justice and ensure that it is carried out throughout the Commonwealth, with a focus on environmental justice communities and fence line communities" (Code of Virginia Code - Article 12. Virginia Environmental Justice Act, 2020). The definition set forth in the VEJA features vague language which is loosely applied across the Commonwealth. Below in Figure 2, is the outline of the current environmental justice definition across the state. The broad definition does not focus on those most affected, known as fence line communities. As per a conversation with Danielle Simms, the current director of EJ at DEQ, defining fence

line communities is difficult for the state because of pollution being harmful at different mileages within the varieties. For example, one approach for limiting pollution in a certain mileage of landfills may not be the best approach for air pollution.

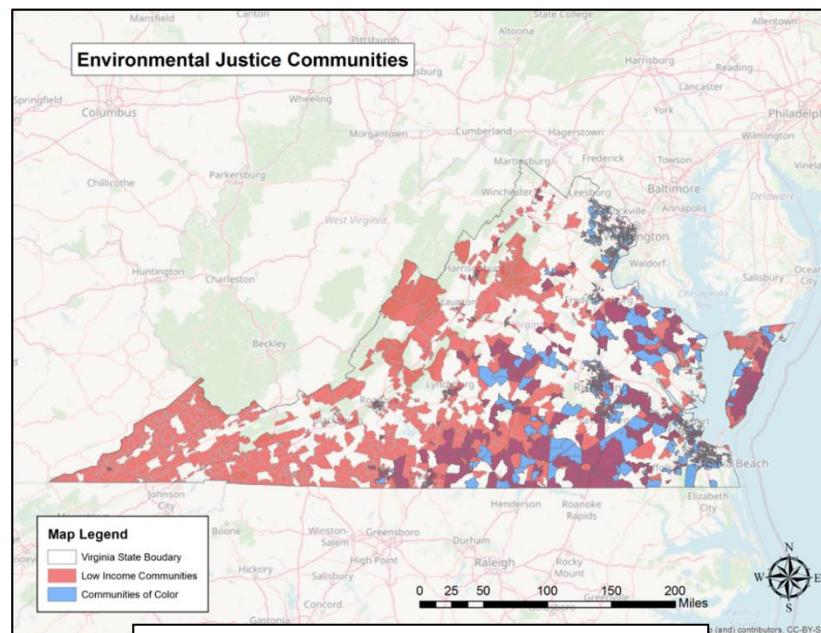


Figure 2: Mock-up of Virginia Definition of EJ Communities

Political Influence

Environmental justice remains a highly contentious policy area. When considering actions to address environmental justice in Virginia, policymakers must prioritize political action at the state level. The political landscape in Virginia is mixed with Governor Youngkin, a Republican, currently leads the Commonwealth. Meanwhile, the General Assembly, composed of the Senate and the House of Delegates, holds a slim Democratic majority (*Party Control of Virginia State Government, 2024*).

Dominion Energy plays a unique role in Virginia politics. The utility provider is the highest campaign donor across the state. In 2024, which was an off-cycle year for state-level elections, Dominion Energy donated \$2,788,279 to various campaigns. In the 2021 Gubernatorial race, Dominion Energy donated \$6,544,113 towards campaigns (VPAP, 2024). However, Dominion Energy does not support it on a partisan basis, splitting most of the funding in a bipartisan way. Although, the campaign donations shifted in 2021 to support more Democrats, as seen in Figure 2, the support has shifted between the Republicans and Democrats in the years between a gubernatorial election (Oliver, 2021; VPAP, 2024).

Dominion Energy's political donations surge

The electric company's campaign contributions to state politicians by political party, 2001-2021

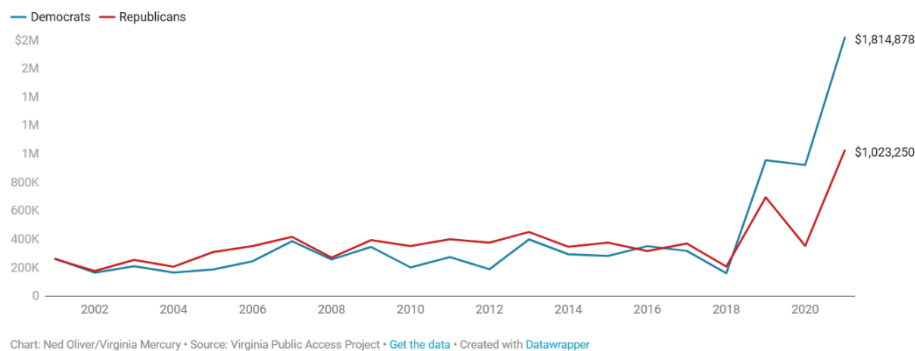


Figure 3: Dominion Energy political donations 2000-2021

It is important to note that the amount of influence that Dominion Energy has in state politics can lead to beneficial change in the realm of Environmental Justice, as explored below with the alternatives.

Key Stakeholders

Virginia's environmental justice landscape involves multiple key stakeholders, including government agencies, industries, local governments, and advocacy groups. Dominion Energy is Virginia's largest utility provider and has a significant role in environmental policy and energy infrastructure development. Dominion Energy has been critiqued in the past for environmental practice, such as coal ash disposal and pipeline projects, which have disproportionately impacted vulnerable fence line communities (SELC, 2022).

The Virginia General Assembly is vital in shaping environmental policies, like the Virginia Environmental Justice Act and participation in regional initiatives like the Regional Greenhouse Gas Initiative (Barakat, 2024). Cities and counties are responsible for implementing state environmental policies at the local level, directly impacting the people within fence line communities. Many local governments face challenges in addressing pollution and enforcing environmental protections with limited resources (Morrison, 2025).

The public plays an important role advocating for stronger environmental protection for EJ communities. The history of EJ is the civil rights movement and grassroots activism and public participation in policy discussions continue to influence key environmental justice decisions (Funes, 2023). In addition to the public, non-profits, such as the Southern Environmental Law Center, play an essential role in legal advocacy and policy reform. SELC has successfully challenged environmentally harmful projects, such as the now-canceled Atlantic Coast Pipeline (SELC, 2022).

There are many polluting facilities across the Commonwealth, including manufacturing and industrial sites, which contribute to air and water pollution in Virginia. Regulatory oversight from government agencies, such as the Environmental Protection Agency and the Virginia

Department of Environmental Quality (VDEQ), is crucial to mitigating their environmental impact (VDEQ, 2025). Lastly, the Governor's Office holds significant influence over Collaboration among these stakeholders is essential for achieving equitable and sustainable environmental policies in Virginia.

Within the ecosystem of various stakeholders, and the polarization of environmental policies, the EJ policies have stalled. While the VEJA was passed in 2020, it was done under a Democrat Governor. With Virginia being served by a Republican Governor, there has not been any meaningful investment in EJ. In addition to the inaction, or action being stalled in the state government, Virginia has a lack of actions for state agencies as compared to other states on the Eastern Coast of the United States. States like New Jersey, who have not only codified EJ into law, but have included EJ rules to reduce pollution in vulnerable communities in the permitting process (State of New Jersey, 2023). The localities that are considered EJ communities may not have the right to deem themselves EJ or determine which areas are fence line communities because of Virginia being a Dillion Rule state, which deems that localities can only wield powers explicitly authorized to them by the state (Williamson, 2020).

Current Legislation

Legislation addressing concerns surrounding environmental justice is a recent development in Virginia. In 2020, the Environmental Justice Act was passed it was done in the Senate and the House of Delegates with slim majorities and was signed into law under Governor Northam (Environmental Justice; Definitions, Agency Regulations, Virginia Environmental Justice Act, Policy, 2020). Listed in the Code of Virginia, the VEJA sets forth a range of definitions that serve as base level understanding for EJ. The official policy is grounded in the state prioritizing promotion of environmental justice with a focus on fence line communities (*Code of Virginia Code - Article 12. Virginia Environmental Justice Act*, 2020). However, the VEJA creates a gap between defining EJ concerns and providing entities with actionable items.

Although the Virginia Department of Environmental Quality (DEQ) requires the Virginia Environmental Impact Report Procedure (VAIER) on development projects, there are no specifications for the impacts for environmental justice communities instead outlining the process for all communities (*See How Virginia Is Addressing Environmental Justice*, n.d.). DEQ highlights the agencies responsibility to further environmental justice while increasing public participation in the regulatory and permitting processes (*Current Air Quality and Forecast / Virginia DEQ*, n.d.). The Office of Environmental Justice was established in 2021 for VDEQ to provide an outlet for the state to connect with the fence line communities.

In recent years there have been attempts to further solidify the role of the Virginia Environmental Justice Act from the General Assembly. In 2020, a budget bill passed that supported an increase in finances going towards the Interagency Environmental Justice Working Group, which was to be comprised of 10 environmental justice coordinators representing each of the Governor's Secretaries underneath the VEJC (Budget Bill - HB30 (Chapter 1289), 2020). However, due to the COVID-19 pandemic, these funds were dissolved from VEJA and allocated in different areas and have not returned to the budget. In 2024, a range of bills were introduced that varied from establishing an Environmental Justice Task Force to requiring electric utilities to report to the Environmental Justice Council

(Electric Utilities; Integrated Resource Plans, Grid-Enhancing Technologies and Advanced Conductors., 2024). A bill in the 2024 session aimed to establish a task force that would consist of the Secretary of Natural and Historic Resources, the Secretary of Health and Human Resources, the Secretary of Commerce and Trade, the Secretary of Agriculture and Forestry, and the Secretary of Transportation, or their designees to aid in the mission seen in the VEJA (HB1000Environmental Justice Task Force; Establishes, Report., 2024). Although the bill failed, it outlined a new group of Secretaries brought together to focus on environmental justice as a collective issue.

During the 2025 Session, the General Assembly continued to acknowledge the importance of existence of the Environmental Justice Council by crafting legislation that aimed to increase the responsibility of the council. This was seen multiple bills; one that called for the creation of an EJ Taskforce for various state agencies and another that wanted an air quality monitoring program for certain communities, both reporting to the VEJC. Another bill introduced in 2025 was centered around cities with populations exceeding 20,000 and counties with populations over 100,000 incorporate an environmental justice strategy into their comprehensive plans, further clarifying EJ communities for Virginia (SB1254 Comprehensive Plan; Environmental Justice Strategy., 2025)

The issue of environmental justice is not an issue that Virginia alone faces. Action on EJ has occurred in California, New Jersey, and Colorado which have included environmental justice in legislation with varying degrees of success. California changed legislation regarding the requirements of the South Coast Air Quality Management District to include a desire for environmental justice experts to serve on the board (AB 2522- CHAPTERED, 2024). New Jersey attempted to include environmental justice initiatives in transportation bills, as documented in the New Jersey Target Zero Commission, which stalled in the state legislature (NJ Legislature, 2024). Colorado included initiatives that resulted in an appropriation to target research into air pollution (Cumulative Impacts & Environmental Justice, n.d.). The response to environmental justice communities is a guide into what policies Virginia can take, but the effectiveness of the legislation must also be accounted for, like in New Jersey with legislation not passing or failing.

Harmful Pollutants

There are many different harmful pollutants to environmental justice communities across Virginia. These range from stormwater, solid waste, noise pollution, and air pollution.

- Stormwater is the water that runs off from the surface of the earth and can contain harmful substances like chemicals, pathogens, and even human waste (University of Nebraska, 2017).
- Solid waste is defined under the Resource Conservation and Recovery Act (RCRA) as “any garbage or refuse, sludge from a wastewater treatment plant, water supply treatment plant, or air pollution control facility and other discarded material, resulting from industrial, commercial, mining, and agricultural operations, and from community activities” (US EPA, 2016).
- Noise pollution is the harmful effect that loud noise can have on human health. The European Environmental Agency ranks noise pollution second to air pollution as the environmental exposure most harmful to public health (Dutchen, n.d.).

- Air pollution is contamination of the indoor or outdoor environment by any chemical, physical or biological agent that modifies the natural characteristics of the atmosphere (World Health Organization, 2025). Research shows that exposure to pollutants such as airborne particulate matter and ozone has been associated with increases in mortality and hospital admissions (Brunekreef & Holgate, 2002). In addition, air pollution and climate change have a complex effect on health because of the wide responses that a state can have without acknowledging every aspect of change, like air pollutants (Tran et al., 2023).

Consequence of the Problem

The consequences of inaction on EJ are the continuation of discrimination promoted by a vague policy within the Commonwealth. Research shows that the communities that suffer from poor environmental conditions due to air pollution are more likely to suffer poor health conditions with an elevated risk for heart attacks, severe asthma, and death (Revesz, 2022). The Center of Disease Control (CDC) insists on the need for protection of communities from disproportionate human health due to environmental effects and hazards. While acknowledging the cumulative impacts of environmental burdens, and the legacy of racism or other structural or systemic barriers that prevent certain communities from having equitable access to a healthy environment (CDC, 2024). If Virginia continues to operate without a strong definition of EJ then there will be rising public health concerns in the EJ communities.

Alternatives

Alternative One: Strengthening the Virginia Council on Environmental Justice
The status quo in Virginia is the Environmental Justice Council, which was established in 2020 under the VEJA. Increasing financial support for the VCEJ allows beneficial change within the state and works towards a more defined future within environmental justice.

The Virginia Council on Environmental Justice was formed in 2019 by Governor Northam through an Executive Order, which centered around the council's ability to generate proposals for consistent approaches to evaluate environmental justice (Secretary of Natural and Historic Resources, 2019). While VCEJ has been operating for five years, there is currently no funding for the positions on the council or ways to expand the roles that a member plays, the funding is limited to travel expenses for meetings. Beneficial expansion of the roles can take on a variety of actions, such as increasing the staff of the VCEJ. Specifically, a position for a grant writer that would engage with EJ and fence line communities to search for funds to promote health and wellbeing in the affected areas. The GA and the Governor's Office would take on the cost for this alternative. Updating the language around the Virginia Environmental Justice Act would be necessary to amend the Act, therefore time would be taken from the GA. The Governor's Office would take on the rest of the cost for the functioning and future funding of the VCEJ, including the increased financing in the bicentennial budget.

Since environmental justice affects a variety of people, many researchers observe benefits in a governance board to bring together a diverse group of stakeholders to the table, especially environmental justice (Ansell & Gash, 2008; Callahan et al., 2011). The Virginia Council on

Environmental Justice has members from Black Family Land Trust Inc, Climate and Clean Energy Equity Fund, Virginia Natural Gas, and many local advocates (Secretary of Natural and Historic Resources, 2024). Although, the VEJC is not unique in the formation of appointed members from diverse backgrounds; collaborative governance boards in Virginia cover a range of topics such as the Agriculture Council to the Commissioner's Advisory Council on Health Disparity and Health Equity.

However, it is not enough to create the board to address the issues that environmental justice communities face, but to have the board create mechanisms for meaningful participation by the affected population (Farrell, 2012). A study done by Siddiki and Ambrose investigated the impact of EJ councils, specifically a Midwest EJ council and the Mid-Atlantic EJ council to evaluate the impact of EJ councils (2022). The study sample was two years, and the results centered around the growing number of vacant positions. This was seen in the later years of the study for both of the councils with state-level politicians leaving the council after the first year arguing that the attention of the stakeholders shift to new focusing events (Imperial, 2023; Siddiki & Ambrose, 2023). While Ambrose and Siddiki stress the importance of an EJ council, the study warns against a lack of concentrated and sustainable effort.

Research highlights significant challenges in addressing environmental justice (EJ) impacts through governance boards. Scholars argue that efforts to build community groups focused on environmental issues often occur too late, leaving vulnerable populations, such as Indigenous communities, without adequate protection (Whyte, 2020). Governmental actions frequently emphasize forming EJ task forces, advisory groups, and researching the existence of disparities rather than actively working to eliminate them (Callahan et al., 2011). Due to the nature of EJ, it is difficult to produce actionable items without financial backing for support of mitigation or adaptation for EJ communities. Furthermore, some studies question the effectiveness of collaborative governance boards, suggesting that even when actors coordinate, these efforts do not always lead to environmentally sustainable or socially equitable outcomes (Ravikumar et al., 2018). Dominion Energy would benefit from EJ communities having access to resources from the VEJC, such as increased education for areas before developments. Dominion Energy may work to appoint an internal member to the VCEJ to further understand the benefits and changes seen within the council.

Alternative Two: Support Increased Community Engagement

Community engagement being required under a shift in legislation would be beneficial for EJ projects across the Commonwealth. Although it may seem that requiring community engagement has potential to be a counter-intuitive process, this is not true. Research shows that it is more effective to consider the issue from the perspective of communities engaging with the government rather than the government engaging the community (King & Cruickshank, 2012). With the community engagement delegated back to the community, it is important to build the capacity of the community to more effectively engage government or private sector developers in an effort to strengthen their own community (King & Cruickshank, 2012). As seen in Oregon, there was a mandate under the Environmental Justice Task Force that called for public participation (Ambrose, 2024). Any meetings that were held

in Oregon without a significant amount of public participation were not considered satisfactory for the task force.

Another way to enhance community engagement would be a Community Benefit Agreement (CBA), which is a contract between developers and community groups, which outlines the benefits the community will receive from a project (Office of Energy Justice and Equity, 2022). A CBA would be a private-public partnership that encourages community engagement directly with developers throughout the process to find a solution outside of the potentially harmful impacts (Salkin & Lavine, 2008). These benefits might include improvements in infrastructure, healthcare services, or environmental remediation efforts that directly address community needs. Sometimes the CBA is a documented bargain outlining a set of programmatic and material commitments that a private company makes prior to development to benefit residents of a development area (Wolf-Powers, 2010). Companies are motivated to participate in CBAs to enhance their public image through positive actions.

In the case of Dominion Energy, a CBA could be used to ensure that environmental justice communities suffering from particulate matter pollution receive targeted interventions, such as air quality monitoring, access to air filtration systems, or health programs to address issues caused by pollution. While air quality monitoring is done by the DEQ, CBAs offer a way to ensure that projects benefit not only the company but also the local communities impacted by environmental degradation. By collaborating with local stakeholders and incorporating their needs, Dominion Energy could improve relationships with these communities and reduce the disproportionate health impacts they face due to air pollution (Gunton & Markey, 2021). Directly engaging with the fence line communities allows Dominion Energy the opportunity to impact the most affected populations across the Commonwealth. In the case of CBAs Dominion Energy would absorb the cost of this alternative, as it is private action to the EJ issue across the state.

Alternative Three: Support a Mandate System on Councils

A mandate system to engage a more diverse amount of people is common across many different policy areas and across different levels of governments. It would be beneficial to require EJ experts to serve terms with other councils to share interdisciplinary knowledge. In California, amendments addressed the need for EJ experts in the appointment processes for the San Diego County Air Pollution Control District governing board. Within the amendments there was the inclusion of members with expertise in public health, environmental justice, and scientific or technical backgrounds related to air pollution (AB 2522- CHAPTERED, 2024).

California is not alone with a mandated system of expertise for councils. Rhode Island in 2014 required that there be four members appointed who have expertise in economic policy or workforce development, protection of natural and cultural resources management, energy planning and development, and engineering and design. In addition to four members with expertise in education, public health and safety, housing, or from organizations representing or serving youth or the elderly (S.B. 2952 (2014 Regular Session): Relating to State Affairs and Government, 2014). While Rhode Island did not specifically require EJ expertise in 2014, the inclusion of specific expertise is a road map for Virginia to expand the inclusion of expertise of EJ statewide.

Currently the state of Virginia has a range of councils across the Commonwealth that focus on the environment. The councils are the Environmental Sustainability Council (ESC), Virginia Council on Environmental Justice (VCEJ), Chesapeake Environmental Improvement Council (CEIC), Piedmont Environmental Council, and Virginia's United Land Trusts (*Environmental Sustainability Council / Falls Church, VA - Official Website, 2025; Virginia Council on Environmental Justice, 2025*). Changing the language to the bills that set up each of the individual councils across the state would be necessary, whether that was in the General Assembly or at the local level. The importance of including EJ experts on a range of different task forces is evident for a future that is facing worse climate change conditions. The cost of this alternative would put on the state and localities and depend entirely on if the councils are financially incentivized.

Criteria

Effectiveness

This criterion evaluates how well an alternative improves environmental justice governance by reducing fragmentation and increasing coordination among state actions. It assesses whether the alternative leads to concrete, measurable improvements in addressing environmental justice issues, as opposed to symbolic or superficial efforts. Given the historical pattern of minimal impact from previous initiatives, this criterion focuses on ensuring that proposed alternatives result in genuine, long-term improvements. For example, including environmental justice in Dominion Energy's Integrated Resource Plan (IRP) demonstrates that aligning state action with corporate goals can produce measurable outcomes. Estimates of effectiveness will be drawn from case studies of similar interventions in other states, along with insights gathered from expert interviews in the field.

Administrative Feasibility

This criterion assesses the administrative complexity of each alternative. Because governance structures often require sustained engagement and institutional support, this criterion will measure both the ease of initial implementation and the likelihood of long-term viability for the EJ fenceline communities. This evaluation will be completed based on informational interviews from experts in the field since administrative feasibility must be understood from an internal point of view. This will be measured on a scale of low, medium, and high based on how likely Dominion Energy would be to meet the increased demand for an alternative.

Political Feasibility

This criterion evaluates whether an alternative is likely to gain support from key policymakers and stakeholders, as well as whether it has the potential to disrupt or reinforce the status quo. Given the role of the private sector in environmental justice governance, it is important to assess how different interest groups may respond. It is important to acknowledge that Dominion Energy is very engaged in the policy making process at the state level. Measuring that an alternative would have political feasibility in addition to administrative feasibility is crucial. This will be measured on low, medium, high political feasibility. I will review EJ legislation proposed in the VA GA in recent years. I will analyze the votes for and

against to understand the breakdown of Democrats and Republicans that support the bill. To further understand this criterion, I will meet both state and local elected officials.

Cost

This criterion measures the financial sustainability of each alternative by assessing its cost and funding source. Given the constraints on state and private-sector funding, an alternative's possibility depends heavily on whether it has a viable financial model for the state to consider the change. The cost will be measured in the real dollar (\$), or the current dollar amount, for each alternative.

Equity

This criterion examines whether an alternative ensures fair distribution of benefits and meaningful inclusion of fenceline communities in decision-making. A major challenge in Virginia's current governance structure is the exclusion of those most affected by environmental injustice. This criterion prioritizes alternatives that increase local agency and representation. Some environmental initiatives measure equity through financial incentives being distributed to a specific amount of underserved populations, like Project40 under the Biden Administration (*Justice40*, 2021). However, this project will be using equity of access based on geographic location, or fenceline communities within the context. This will be measured on a scale of low, medium, and high and will be evaluated using the expert interviews from DEQ officials on equity measurements for fence line communities in the state.

Policy Alternative Evaluation

Alternative 1: Strengthening the Virginia Council on Environmental Justice

The current status quo in Virginia is the Environmental Justice Council, which was established in 2020 in connection with the Environmental Justice Act. Expanding on the current operations of the Commonwealth allows for a beneficial change within the state and works towards a stronger future for environmental justice.

Effectiveness

The council could improve coordination, with effectiveness depending on the ability to influence meaningful policy decisions both at the local level within the EJ communities and across the Commonwealth. However, some studies show that many advisory councils struggle to transition from recommendation to enforcement (Callahan et al., 2011). A clear definition of fenceline communities within the Code of Virginia and funding towards the VEJC has the possibility to increase the actions possible from Dominion Energy and the state of Virginia. *This ranks medium in effectiveness because strengthening the VCEJ has potential to benefit the fenceline community but avoids targeting the issue of disjointed efforts in the EJ system.*

Administrative Feasibility

Dominion Energy has a mission statement that directly relates to the inclusion of environmental justice with the current system. In the most recent International Registration Plan, or IRP, Dominion Energy says that the company is committed to making environmental justice considerations part of our everyday decision making as they work to deliver reliable, affordable, and increasingly clean energy to the 2.7 million customers in Virginia and North Carolina (*IRPs / Dominion Energy*, 2024). Within the current system, Dominion Energy has a representative to the Environmental Justice Council and would be content keeping the system the same, with no additional action needed from them. Expanding the existing council is administratively easier than creating a new entity. However, without funding or full-time staff, effectiveness remains limited. Some research does show that EJ councils struggle with long-term sustainability due to shifting political attention, and not administrative feasibility (Siddiki & Ambrose, 2023). *This ranks medium in administrative feasibility because Dominion Energy would not have to change under current operations but could be subject to change with internal shifts in leadership for the company and the possibility of new goals away from EJ.*

Political Feasibility

Change to the current system would be done by expanding on the Virginia Environmental Justice Council that currently operates. As seen in legislation proposed during the session in 2025, reliance is growing on the VEJC within other initiatives. Both VA S.B. 1021 and VA S.B. 1254 focus on expanding the reach and responsibilities of the VEJC. In the most recent session, Senate Bill 1254 was passed which requires cities with populations exceeding 20,000 and counties with populations over 100,000 incorporate an environmental justice strategy into their comprehensive plans starting July 1, 2025 (SB1254 Comprehensive Plan; Environmental Justice Strategy., 2025). The political feasibility of change for the VEJC is timely and in line with actions seen by the General Assembly. *This ranks medium in political feasibility because it has a score of 4 out of 8 with the sheet seen in Appendix 2.*

Cost

The addition of positions and new requirements for the council would come with additional expectations and compensation. New roles like a grant writer and an outreach coordinator would have to be given a salary to work for the council year-round. There would also be a financial incentive to perform as a council member. When the EJ Council was originally proposed in the first draft of the VEJA in 2020 by Delegate Keam, there was a request put in the budget for administrative and support services at \$748,431 and general support at \$640,939 and Federal Trust at \$107,492 (Environmental Justice; Definitions, Agency Regulations, Virginia Environmental Justice Act, Policy, 2020). The funding source would likely be the Virginia state budget appropriated through the General Assembly.

Equity

Changing the current system has the potential to increase equity within the system by increasing the representation seen on the council. The board would be able to create mechanisms for meaningful participation by the affected population (Farrell, 2012). Beneficial expansion of the roles could look like adding more staff to the VCEJ, including a grant writer that would be able to partner with EJ and fenceline communities to search for funds to promote health and wellbeing in the affected areas. *This ranks as a medium on equity because changing to the VCEJ has the potential to expand the access of the council to more fenceline EJ communities but may fall short of increased collaboration between the different stakeholders.*

Alternative 2: Community Engagement

Direct community engagement being required under a shift in legislation would be beneficial for projects being developed across the Commonwealth within fenceline communities. Research shows that it is more effective to consider the issue from the perspective of communities engaging with the government rather than the government engaging the community (King & Cruickshank, 2012). With the community engagement delegated back to the community, it is important to build the capacity of the community to more effectively engage government or private sector developers in an effort to strengthen their own community (King & Cruickshank, 2012). In Oregon there was a mandate under the Environmental Justice Task Force that called for public participation (Ambrose, 2024). Another way to increase community engagement would be a Community Benefit Agreement (CBA), which is a contract between developers and community groups, which outlines the benefits the community will receive from a project (Office of Energy Justice and Equity, 2022). A CBA would be a private-public partnership that encourages community engagement directly with developers throughout the process to find a solution outside of the potentially harmful impacts (Salkin & Lavine, 2008).

Effectiveness

Some research on CBAs shows that a community benefit agreement can lead to tangible community benefits, including air quality improvements, job creation, and infrastructure investments (Wolf-Powers, 2010). A study on environmental justice found that engaging local communities leads to stronger environmental and economic outcomes (Gunton & Markey, 2021). Requiring community members to be a part of the conversation starts to aim at reducing the fragmented efforts on environmental justice seen across the state. *This ranks high in effectiveness because the increased community engagement targets the need from public and private action on environmental justice.*

Administrative Feasibility

From the viewpoint of Dominion Energy, the administrative feasibility becomes harder with community engagement. An increased burden is put on the company to be actively engaged and a part of the community that they are developing in. Implementing mandatory

community engagement and CBAs can require major structural shifts within the project approval processes and developer obligations. Research done by Wolf-Powers found that CBAs require strong local oversight to ensure compliance, which increases administrative burden (Wolf-Powers, 2010). In addition to the complexity of garnering support from the private corporations, many CBAs lack standardized enforcement, making them complex to manage (Salkin & Lavine, 2008). *This ranks low in administrative feasibility because of the increased burden on Dominion Energy and the changes that would be required with the current process of community engagement in the planning process, but not afterward.*

Political Feasibility

While it is possible that community groups, EJ advocates, and local governments strongly support engagement mandates, developers and business associations often oppose them due to concerns over project delays and increased costs (Gunton & Markey, 2021). On the opposite side the EJ lead at Dominion Energy is skeptical of CBAs and operates under the assumption that the people who would advocate against development would not accept a CBA as fair treatment (“personal communication” 2024). Research done in Oregon found that mandated public engagement improves long-term trust but requires sustained political backing to be effective, which can be complicated for politicized issues like environmental justice (Ambrose, 2024). *This ranks medium/ low in political feasibility because it has a score of 2 out of 8 with the sheet seen in Appendix 2.*

Cost

The additional cost for community engagement would begin with the regulation increased manpower necessary with a Compliance Inspector salary range of \$59,000-\$86,000 at the Virginia Department of Environmental Quality, which has a median of around \$72,000 (Glassdoor, 2025). The state would need at least three individuals to manage the new regulations, meaning that there would be \$216,000 in salaries. There would also be the cost of legal and administrative costs in the form of contract enforcement for CBAs and local government coordination. The funding source would be a shared responsibility between private developers for the CBA agreements, state government, and local government. The total cost would be in the range of \$650,000 - \$800,000.

Equity

An increase in community engagement directly empowers fenceline communities by requiring meaningful participation in the decision-making process. Studies show that CBAs and engagement mandates help historically marginalized communities access resources that would otherwise be unavailable (Salkin & Lavine, 2008). Although, the strength of the equity increase can depend on a strong legal enforcement to prevent CBAs from becoming symbolic agreements (Wolf-Powers, 2010). *This ranks high on equity because increased community engagement benefits the traditionally underserved EJ communities.*

Alternative 3: Mandate System on Councils

A mandate system to engage a more diverse perspective from a wider range of people has been seen in many different policy areas and across different levels of governments. In the case of EJ, there is a possibility it would be beneficial to require EJ experts to serve terms on other councils. In California, amendments addressed the need for EJ experts in the appointment processes for the San Diego County Air Pollution Control District governing board. Within the amendments there was the inclusion of members with expertise in public health, environmental justice, and scientific or technical backgrounds related to air pollution (AB 2522- CHAPTERED, 2024).

Effectiveness

Mandating EJ expertise improves the likelihood of stronger EJ policy outcomes and continued engagement internally, but the effectiveness depends on how much influence these experts have over final decisions (Konisky, 2009). In San Diego, mandated EJ expertise on the Air Pollution Control Board led to more stringent environmental regulations, demonstrating potential positive impacts (AB 2522- CHAPTERED, 2024). However, without enforcement mechanisms put in place when the mandates are formed, expert recommendations could be overridden by political shifts seen in the state or federal government. *This ranks medium/high in effectiveness because a mandate system increases the core ideal of expanding the access of actions to EJ communities and leadership.*

Administrative Feasibility

Implementing mandated EJ expertise on councils is simple compared to creating new entities or modifying the current structures through the General Assembly. It requires changing the existing council appointment criteria, which involves amending state and local legislation or executive orders. This was successfully done in Rhode Island with S.B. 2952 in 2014 to change the council on climate change to include members from different expertise, including an environmental justice expert (S.B. 2952 (2014 Regular Session): Relating to State Affairs and Government, 2014). In addition to Rhode Island's action, California also has mandated EJ experts on councils across the state, which shows that this model is viable with proper legislative support (AB 2522- CHAPTERED, 2024). The administrative feasibility from Dominion Energy is clear, as they would continue to put a member of the EJ team that they have on the council. *This ranks high in administrative feasibility because Dominion Energy can internally support a mandate system without being required to restructure operations.*

Political Feasibility

The mandate system would be easier to pass than regulatory measures because of the focus on expert representation rather than imposing new environmental restrictions. In California, AB 2522 was successfully implemented without major opposition due to its focus on scientific expertise rather than enforcement authority (AB 2522- CHAPTERED, 2024). Similar policies in Rhode Island have also received bipartisan backing (S.B. 2952 (2014 Regular Session): Relating to State Affairs and Government, 2014). In Virginia, supporting

representation on the council should be easy as there are already a range of people serving on it such as members from Black Family Land Trust Inc, Climate and Clean Energy Equity Fund, Virginia Natural Gas, and many local advocates (Secretary of Natural and Historic Resources, 2024). *This ranks high in political feasibility because it has a score of 6 out of 8 with the sheet seen in Appendix 2.*

Cost

The mandate system would increase costs similarly to the alternative one, by giving stipends to the council experts. Stipends for EJ Experts can be assumed to be \$50,000 per year. Necessary training and support for EJ Representatives would also increase costs. Within the training there would be workshops and administrative oversight costing around \$100,000 - \$500,000 depending on the program. The funding source would be the state and local governments, which would be integrated into the existing council by increasing the finances across the state.

Equity

Increases representation of EJ perspectives within key decision-making bodies, ensuring that EJ issues are considered in broader environmental policies. However, this does not guarantee direct community representation, as appointed experts may not always align with local concerns (Whyte, 2020). While procedural justice can improve with a mandate for experts to serve on the council, it does not necessarily translate into better environmental outcomes for marginalized groups unless paired with strong community engagement. The room for error in equity is increased when reasoning that environmental justice and frontline communities are surrounding the most vulnerable populations in Virginia, and the mandate would mainly serve as a tool for having experts on councils across the state councils. *The mandate system on councils ranks medium on equity because while it increases the EJ expert's ability to serve on councils, it can limit the communities themselves from being a part of the process.*

Outcomes Matrix

Table 1: Outcomes Matrix

Outcomes Matrix			
	Alternative 1: <i>Strengthening the Virginia Council on Environmental Justice</i>	Alternative 2: <i>Support Increased Community Engagement</i>	Alternative 3: <i>Support a Mandate System on Councils</i>
<i>Effectiveness</i>	Medium	High	Medium/High
<i>Administrative Feasibility</i>	Medium	Low	High
<i>Political Feasibility</i>	Medium	Medium/Low	High
<i>Cost</i>	\$335,000	\$650,000 - \$800,000	\$450,000
<i>Equity</i>	Medium	High	Medium

Recommendation

Mandate System on Councils

The mandate system is the most feasible alternative because it enhances environmental justice (EJ) representation without creating new bureaucratic hurdles. By embedding EJ experts into existing environmental councils, this policy ensures that decision-making bodies incorporate EJ perspectives at a structural level rather than relying on advisory boards with limited authority. This alternative is politically viable because it does not introduce new regulatory burdens, making it less likely to face opposition from industry stakeholders or legislators. Additionally, it is the most cost-effective option, with an estimated annual cost of \$250,000 - \$750,000, compared to \$3M - \$6M for community engagement mandates. The presence of EJ experts strengthens policy recommendations, leading to better environmental enforcement outcomes, particularly in air quality and climate adaptation efforts (Konisky, 2009). Dominion Energy has an incentive to support this policy, as it reduces regulatory uncertainty and allows for proactive industry engagement in environmental governance. Unlike CBAs, which impose financial obligations on private companies, this system keeps costs predictable while improving public trust. By institutionalizing EJ expertise in decision-

making bodies, the mandate system creates a more equitable, effective, and administratively feasible approach to addressing environmental justice in Virginia.

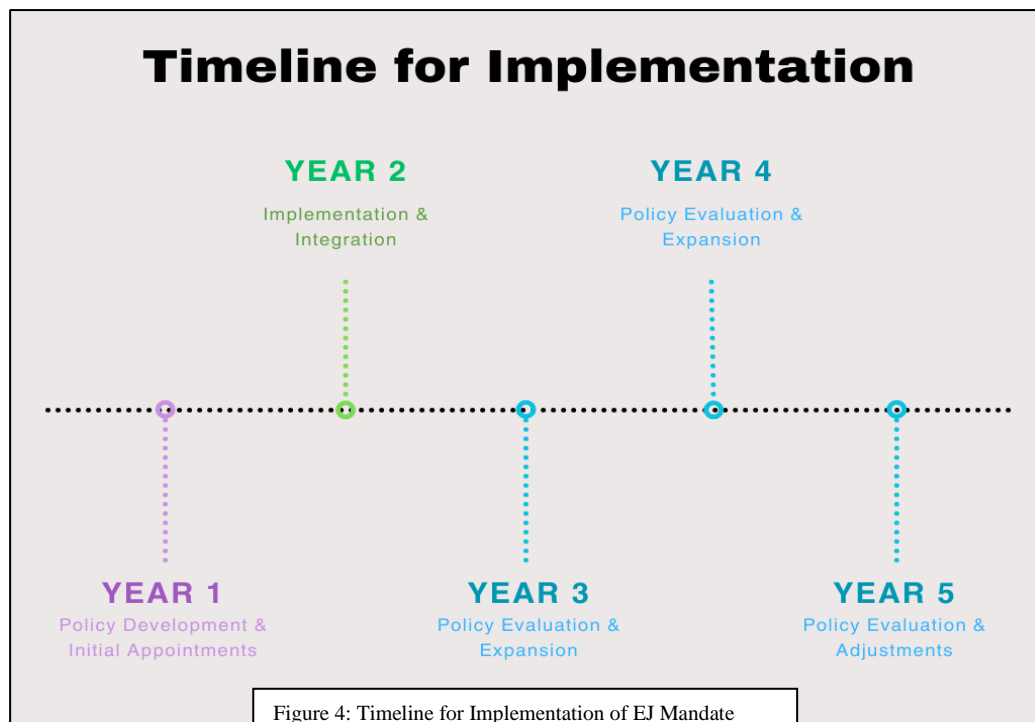
Implementation

Implementing the EJ Council mandate system ensures stronger environmental justice representation in Virginia's decision-making processes. By including EJ experts in existing councils, this approach enhances policy effectiveness, minimizes the current fragmented efforts in the state, and has low costs associated with it. This section outlines a phased implementation plan to integrate EJ expertise while maintaining political and administrative feasibility. To create a successful implementation, it is necessary to set a timeline, consider the stakeholders roles, and evaluate the worst-case scenario.

Timeline

The implementation of the EJ Council mandate system will occur in three separate phases over the course of five years. In the first year, policymakers will draft and approve legislation with action taken from the executive level, appoint EJ experts to existing environmental councils, and establish procedural guidelines. The second year will focus on integrating EJ experts into decision-making, standardizing EJ assessment criteria, and evaluating the early impacts of actions. In the third and fourth year, policymakers will assess policy outcomes, refine processes, and note any gaps in the process. The fifth year, a comprehensive impact report will be published, with recommendations for scaling the model to additional councils or scaling down if the implementation is seen to be harmful. This phased approach ensures effective integration while minimizing administrative and political challenges.

In the first year the major milestone would be passing the legislation during the first quarter and opening the nominations process for EJ experts throughout quarters two and three. In quarter four of year one, the approval process would begin with initial appointments. During the second quarter the focus remains on integration of the mandate policy, with quarters one and two focusing on EJ experts' appointments to councils. To finish year two the councils should develop standardized EJ assessment criteria and decision-making frameworks. Years three and four focus on the policy evaluation and expansion; major milestones include identifying gaps in the integration process and conducting a review on EJ expert participation within council meetings. In year five prior to the comprehensive impact report, in quarter one, there will be stakeholder workshops held to gather data on the effectiveness of the mandate system from the fenceline communities.



Key Stakeholders in Virginia’s Environmental Justice Landscape

Virginia's environmental justice landscape involves multiple key stakeholders, including government agencies, industries, local governments, and advocacy groups. As highlighted in the background, Dominion Energy is Virginia's largest utility provider and has a significant role in environmental policy and energy infrastructure development. Dominion Energy’s role in the implementation would be critical in the year two of implementation of aiding in the expert additions to EJ on councils.

The Virginia General Assembly is vital in shaping environmental policies, like the Virginia Environmental Justice Act and participation in regional initiatives like the Regional Greenhouse Gas Initiative (Barakat, 2024). Cities and counties are responsible for implementing state environmental policies at the local level, directly impacting the people within fenceline communities. Within the mandated system, the General Assembly would take on the role of crafting the legislation to require the new addition to the current system for councils. The legislation process would happen in year one, with the help of different advocacy groups or environmental lobbyists. The Virginia General Assembly operates on a part-time basis and would craft the policy and pass it into law from January-March (Center for Politics, 2025). After the Governor takes action to approve the new EJ mandate, then the appointment process for the EJ experts would open from April-November to receive nominations from across the Commonwealth.

The Governor’s Office plays a significant role in appointments and would begin implementation of the EJ mandate on councils in year one. The Governor would appoint EJ experts based on the nominations and review process seen in year one, bringing the policy into year two. While initial appointments would happen in year one, the appointments ebb and flow and would continue throughout the entire five years. The Governor’s Office would

ensure that appointed experts reflect diverse perspectives within the environmental justice space, including public health, equity, and scientific expertise. The Virginia Department of Environmental Quality (VDEQ), is crucial to monitoring environmental impact in Virginia and would be the best state agency to oversee the vetting and qualification process, ensuring that experts meet established criteria to aid in smooth implementation for the mandate policy. In addition to vetting the nominations to councils, VDEQ would play a lead role in overseeing compliance with the mandate, ensuring that EJ experts actively participate in council meetings and contribute meaningfully to policy decisions through year three to year five.

The public is a critical stakeholder advocating stronger environmental protection for EJ communities. The history of EJ is the civil rights movement and grassroots activism and public participation in policy discussions continue to influence key environmental justice decisions (Funes, 2023). In addition to the public, non-profits, such as the Southern Environmental Law Center, play an essential role in legal advocacy and policy reform. To engage the public and non-profits, the General Assembly should require the input of different stakeholders in the form of an advisory panel requirement within the mandate requirement legislation in year one. This advisory panel would consist of EJ advocates, local government officials, and community leaders who could provide recommendations on candidate selection. The public's role would be seen in year one and then reevaluated in year five for adjustments if the policy is deemed to be too public focused or too far from the public.

Worst Case Scenario

The worst-case scenario for environmental justice (EJ) policy changes is that clarifying fenceline communities within EJ may unintentionally harm the very communities it aims to protect. Former Director of Environmental Justice Renee Hoyos highlighted concerns that being labeled an EJ community could carry a stigma if no substantive action follows. This designation, without accompanying resources or policy interventions, could place an added burden on localities to combat negative perceptions rather than receiving meaningful support.

Moreover, some scholars frame environmental justice as a human rights issue, yet the United States has historically resisted categorizing domestic concerns under this framework (Global Exchange on National Human Rights, 2010; Mehdi & Khomami, 2015). Without an explicit legal obligation to act, designation alone risks being symbolic rather than transformative.

Mandating EJ experts on environmental councils could also have unintended consequences. Many EJ leaders are already overburdened, serving on multiple councils and committees at the local level. Expanding their obligations to advisory bodies statewide risks spreading them too thin, reducing their effectiveness. Additionally, reliance on EJ experts may lead policymakers to engage less critically with the issues. Research suggests that when decision-makers defer to specialized experts, they may become less receptive to new perspectives and less willing to reconsider their positions, even when presented with strong evidence (Lundin & Öberg, 2014).

The slow pace of policy implementation presents another risk. If integrating EJ experts into governance structures takes years to materialize, amid shifting political priorities, the effort could lose momentum. As Perls (2023) highlights, changes that challenge deeply entrenched beliefs and precedents can face prolonged resistance, delaying meaningful progress.

The 2025 Trump Administration's rollback of environmental justice (EJ) initiatives poses significant challenges and can disrupt Virginia's ability to implement EJ mandates effectively. The Environmental Protection Agency's cancellation of \$1.7 billion in EJ grants and the Department of Transportation's exclusion of EJ considerations in infrastructure projects hinder state-level EJ efforts, potentially exacerbating environmental disparities (Singh, 2025; St John, 2025). Executive Order 14151, signed in 2025, directed the termination of all Diversity, Equity, and Inclusion (DEI) and EJ programs within federal agencies (The White House, 2025). The rescission of these programs eliminated critical funding streams and continued to have a downstream effect on EJ policy within Virginia. Without this federal support, Virginia would need to fully absorb the financial burden of EJ initiatives, potentially delaying or scaling back implementation efforts. If an Executive Order was passed specifically targeting EJ efforts across the country, then the odds of a mandate system requiring an EJ expert would be rolled back at the stake of protecting federal funding.

The likelihood of the Trump Administration targeting EJ is high and would mean reframing the expert mandate on councils in a different light in the state. However, there is a way to still recruit the same type of representation to the council to benefit EJ if the policy can account for the federal shift. Virginia's legislators need to proactively mitigate these risks by diversifying funding sources, securing state-level legislative protections, and engaging industry partners to ensure continued commitment to EJ policies. The General Assembly can incentivize compliance with the mandate policy from private entities, like Dominion Energy by offering tax credits or other financial incentives to companies that exceed EJ performance targets or invest in community-based projects. Gaining support from stakeholders beyond the federal level provides a layer of protection that helps safeguard the EJ mandate within the state.

Conclusion

The lack of coordinated environmental justice efforts in Virginia remains harmful to fence line communities disproportionately affected by pollution. Without a clear and unified approach, the state fails to provide adequate protection and representation for these vulnerable populations. By implementing a more inclusive and structured system, Virginia can better address the needs of the fence line communities and ensure that all residents have a voice in shaping their environment. The recommended solution, Dominion Energy's support for an Environmental Justice mandate on councils, offers the most effective path forward for achieving meaningful, equitable outcomes.

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Appendix A: Cost Matrix

Cost Matrix	
Alternative 1: <i>Expanding on the Status Quo</i>	<p>Average salary for a grant writer, according to Government Salaries is \$69,554/yr, with benefits can jump up to around \$80,000. Average salary for an Outreach Coordinator \$78,854 in February 2025 (Salary.com, 2025).</p> <p>Council Member Compensation (if paid \$5,000/year x 27 members = \$135,000).</p> <p>Administrative Expenses are around \$40,000 for office space, tech, travel, and engagement sessions for the council meeting quarterly throughout the year.</p> <p>Total= ~ \$335,000</p>
Alternative 2: <i>Community Engagement</i>	<p>Compliance Inspector salary range of \$59,000-\$86,000 at the Virginia Department of Environmental Quality, which has a median of around \$72,000 (Glassdoor, 2025). The state would need at least three individuals to manage the new regulations, meaning that there would be \$216,000 in salaries.</p> <p>Legal costs seen in the form of contract enforcement and compliance monitoring to ensure that developers adhere to the terms of CBAs, including periodic audits, site visits, and stakeholder interviews. This includes handling disputes and enforcing penalties for non-compliance. The legal costs are estimated to be high, with a range of \$300,000-\$450,000 a year depending on the amount of projects (Salkin & Lavine, 2008)</p> <p>Local government coordination in the form of engaging with the community and the space required. Space can be estimated at \$100,000 a year. Facilitating multiple public hearings and workshops costs approximately \$5,000 - \$10,000 per meeting for materials, space rental, and public notice requirements. Larger municipalities in Virginia spend \$40,000 - \$50,000 annually on community outreach and stakeholder engagement for environmental projects.</p> <p>Total= \$650,000 - \$800,000</p>
Alternative 3: <i>Mandate System on Councils</i>	<p>Stipends for EJ Experts (assume \$5,000 x 10 council appointments = \$50,000).</p> <p>Training & Support for EJ Representatives (workshops, administrative oversight: \$100,000 - \$500,000).</p> <p>Total= ~ \$450,000</p>

Appendix B: Political Feasibility Matrix

Political Feasibility Matrix	
<i>Question</i>	<i>Point Value</i>
1. Does this policy require new legislation or regulatory changes?	Yes (1) No (0)
2. Does this policy have support from key political stakeholders?	Yes (1) No (0)
3. What level of government involvement is required for implementation?	(1 = Low, 0 = High)
4. Are there existing models or precedents for this policy in Virginia?	Yes (1) No (0)
5. How complex is the implementation process? (1 = Low, 0 = High)	(1 = Low, 0 = High)
6. Are there major barriers to administrative feasibility?	(1 = No major barriers, 0 = Yes, significant barriers)
7. Does this policy require significant public engagement?	Yes (1) No (0)
8. Can this policy be implemented quickly?	Yes (1) No (0)