

# 2019 MUNICIPAL POLICY DRAFT

## MUNICIPAL GUIDING PRINCIPLES

### **VLCT supports:**

1. a robust ongoing partnership between state and local governments;
2. local decision-making including the adoption of fees and taxes; full implementation of municipal charter provisions upon local voters' adoption; and a home rule amendment to the Vermont Constitution;
3. including local officials in discussions regarding changes governing local response to emergency situations;
4. enabling implementation of local planning decisions and collaboration between the state and municipalities to support policies that best meet the needs of cities and towns;
5. substantial deference to municipal planning, zoning, and siting decisions when state entities make permitting decisions;
6. maximum flexibility regarding how cities and towns implement state regulatory and statutory requirements;
7. providing local flexibility in pursuing economic development activity;
8. state collection of fees and taxes assessed to implement statewide goals;
9. locally initiated and approved regionalization of services, and
10. providing for inter-municipal cooperation to achieve cost savings and eliminating statutes or rules that prohibit or hinder cooperation;

**State Mandates.** VLCT opposes all unfunded mandated programs, pre-emption of municipal programs, regulatory overreach by agencies of state government that is not supported in statute, and cost shifts to local government. We support full reimbursement of costs for any mandated programs and the preparation of fiscal impact statements that show any potential shift in cost prior to any action being taken by the legislature or administration.

**State Funding Policy.** VLCT supports using state funding efficiently, effectively, and fairly for the specific purposes for which it is appropriated. We oppose diverting those funds to other programs.

VLCT supports funding and incentives for:

- A. payments in lieu of taxes (PILOT) based on fair market value;
- B. all transportation and municipal highway programs;
- C. programs to spur economic development at the local level;
- D. required stormwater management infrastructure;
- E. Department of Corrections' (DOC's) programs and initiatives to avoid adverse local government impacts resulting from criminal justice system decisions;
- F. sufficient beds, support services, and mobile crisis units to serve those with long- and short-term mental health or addiction needs;
- G. local government recovery of costs incurred in providing services to individuals lodged in state-owned or funded facilities and costs to comply with federal, state, or court-ordered licensing, registration, or testing of those individuals;
- H. housing and transportation of persons who present a danger to themselves or the public;
- I. reimbursing the cost to train municipal law enforcement officers who are hired by the state.

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## 1.0 FINANCE, ADMINISTRATION AND INTERGOVERNMENTAL RELATIONS (FAIR)

### 1.01 K – 12 EDUCATION FUNDING

#### Policy.

VLCT supports:

1. ~~a simple and transparent education finance system that reduces and reforms the property tax burden over the long term; and that more closely links voters' actions in approving budgets to the taxes they pay to fund their school districts;~~ and a simplified finance system to make it transparent, and reasonable to implement.
2. a legislative assessment to determine if Act 46 has resulted in cost reductions in school district budgets and per-pupil expenditures without affecting educational quality;
3. using Education Fund monies *only* for pre-K-12 education (No new obligations should be shifted to the Education Fund); and
4. reforming the education funding system so that the education property tax no longer severely constrains capacity to fund vital municipal services and priorities.
- ~~4. maintaining billing and collection of the state education property tax at the local level.~~
45. allowing proceeds from the state's portion of local options taxes to fund only PILOT for state-owned property specified in 32 V.S.A. § 3701(1) ~~as of 2017~~. Retain all local option taxes in the state-owned property PILOT and use only to increase PILOT for those state-owned buildings specified in 32 V.S.A. § 3701(1) ~~as of 2017~~ and in the event of a surplus, for state-owned lands on which state buildings are located.
5. the local legislative body appointing a replacement member to a consolidated school board in the event of a vacancy, until an election is held.

### 1.02 VERMONT TAX STRUCTURE OVERHAUL

#### Policy.

VLCT supports:

1. legislation to reform Vermont's income, sales, and property taxes that ensures simplicity, equity, balance, and sustainability; and
2. providing sufficient revenue for local government initiatives and reimbursing municipalities for all state-mandated property tax exemptions, or providing local voters with the authority to impose municipal service fees on such properties.
3. Extension of locally implemented tax stabilization agreements to education tax obligations, -to encourage and promote economic growth.
4. Providing every municipality the authority to adopt local option taxes through a vote of the local voters..

VLCT opposes any new state imposed property taxes.

### 1.03 OPEN MEETING, PUBLIC RECORDS, AND ELECTIONS LAWS

#### Policy.

VLCT supports:

1. applying the Open Meeting and Public Records Laws to the legislative and executive branches of state government and to entities that receive state or municipal funding except those exempted based on a constitutionally-protected religious purpose; and
2. making the following changes to the law:
  - increasing the requirement for posting minutes from five days to ten business days;

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- limiting ~~mandatory application of the 2014 amendment establishing~~ posting requirements and penalties requirements to statutorily- and charter-required public bodies;
- 3. ~~assuring that clarifying that~~ municipalities may charge for the actual cost of staff time associated with complying with a request to inspect or copy public records and to require pre-payment for the cost of that staff time to ensure the availability and stewardship of public resources;
- 4. amending the Public Records Law to allow individuals or entities the right to request the same materials no more than twice during a 12-month period, and allowing a five-day initial response time;
- 5. providing the option of posting legal notices on electronic web-based news media to comply with requirements for open meeting, public records, and legal notices laws; and
- 6. allowing a gap-day without early voting or new voter registrations on the day before Election Day.

### 1.04 PROTECTING AND ENHANCING MUNICIPAL FINANCES

#### Policy.

VLCT supports:

- ~~1. adjusting local fees set in statute on a minimum three year cycle upon recommendation of local officials;~~
12. developing a partnership with municipalities and regional entities to implement a state economic development strategy at all levels of government;
- ~~23.~~ state payment of costs associated with defending the grand list and property tax collections, including appeals, attorneys' fees, and abatements, in proportion to the state share of the overall property tax; and
34. paying taxpayers directly for education property taxes and interest required to be reimbursed when a property value is adjusted due to an appeal beyond the board of civil authority;
45. requiring municipal ratification of the county budget; ~~and~~
56. eliminating the mandate that local governments take over non-municipal cemeteries; ~~and~~
6. continued state funding of education for listers and assessors.

VLCT opposes any new or increased state agency fees assessed against municipalities unless the agency shows a comparable increase in costs, quality, or quantity of the services provided.

**2019 Draft Municipal Policy  
Transportation Committee Edits  
July 16, 2018**

**2.0 TRANSPORTATION**

**2.01 PRIORITY ISSUES FOR IMPLEMENTATION**

**Policy.**

VLCT supports:

1. simplifying and streamlining funding and program administration to maximize all state and federal dollars and alleviate burdensome processes at both the state and local level;
2. increasing the gas tax and dedicating new revenues to ~~meeting municipal stormwater obligations~~ general support of municipal transportation obligations;
3. funding the Transportation Alternatives Program with state money; and
4. applying Accelerated Bridge Construction (ABC) and design-bid-build process efficiencies to other programs and to all bridge projects unless there is a compelling reason not to use them; and;
5. encouraging adoption of fully funding the “Complete Streets” program, and ~~providing state money to fund portions of paving and rehabilitation projects in combination with other funding sources;~~ encouraging the incorporation of Complete Streets principles into projects.~~and~~

VLCT opposes:

1. ~~using any money from the Transportation Fund for non-transportation purposes;~~
2. using dollars from the Transportation Fund to pay for Agency of Natural Resources projects;

**2.02 ADDITIONAL FUNDING PRIORITIES**

**Policy.**

VLCT supports:

1. ensuring that the level of funding for the Town Highway Emergency Fund is sufficient to cover municipal costs resulting from natural or manmade disasters, whether or not a federal disaster has been declared;
2. finding new state and federal funding for clean water initiatives so on-going transportation programs don't subsidize those mandates;
3. streamlining Municipal Assistance Bureau programs and establishing performance standards for all programs within VTrans;
4. ~~reimbursing any project using federal dollars at the federally allowed rate if it includes undergrounding of utilities or moving water, sewer, and similar infrastructure; and~~
7. ensuring that town highways and bridges are adequately engineered to achieve resiliency and stormwater standards. ~~mitigate any impacts of future weather-related disaster.~~

**2.03 STATE AND LOCAL COOPERATION**

**Policy.**

VLCT supports:

1. restoring District Transportation Administrators' flexibility and authority to work with local governments;
2. finalizing/developing road design and traffic standards to better define approaches to downtown areas and enhance traffic and infrastructure needs for Vermont's villages and downtowns;
3. expanding VTrans painting operations to include painting all lines on paved Class 2 highways each year;

4. providing incentives to municipalities to take over state highways that function as main streets; [and](#)
5. [cooperation between agencies and departments to implement community centered objectives of the Long Range Transportation Plan](#);

## 2.04 COMMERCIAL VEHICLES

### Policy.

VLCT supports:

1. substantially increasing the overweight permit fee or instituting a statewide process for permitting overweight or oversized vehicles on local roads ~~and authorizing municipalities to fine vehicle owners who violate or fail to obtain such a permit~~; and
2. requiring commercial and agricultural custom service vehicles to comply with all motor vehicle laws when operating on state and local highways.

## 2.05 RAIL

### Policy.

VLCT supports:

1. all railroad-related projects complying with environmental regulations, especially water quality requirements;
2. requiring rail companies to notify municipalities of hazardous materials they are transporting through or storing within a municipality's borders;
3. restricting funds allocated for rail or related projects to those specific projects;
4. working with railroad companies to prohibit trains from speeding in downtown areas;
5. extending passenger rail service to Burlington on the western side of the state by 2021~~0~~; and
6. providing authority for municipalities to extend municipal water or wastewater lines under railroad tracks to serve citizens, ensuring access to maintain them, and protecting municipalities from liability for accidents caused by the railroad that affect those lines;
7. [policies that empower municipalities to reduce local emissions, plan for and increase resiliency to the effects of climate change and participate in the transition to a cleaner energy economy](#);

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- D. required stormwater management infrastructure;
- ~~D-E.~~ the recruitment, retention, mental health and wellness needs of all public safety personnel, both paid and volunteer;
- ~~E-F.~~ Department of Corrections' (DOC's) programs and initiatives to avoid adverse local government impacts resulting from criminal justice system decisions;
- ~~F-G.~~ sufficient beds, support services, and mobile crisis units to serve those with long- and short-term mental health or addiction needs; and
- ~~G-H.~~ local government recovery of costs incurred in providing services to individuals lodged in state-owned or funded facilities and costs to comply with federal, state, or court-ordered licensing, registration, or testing of those individuals; ;
- ~~H.~~ housing and transportation of persons who present a danger to themselves or the public [GZI];
- ~~I.~~ reimbursing the cost to train municipal law enforcement officers who are hired by the state.

# 2019 MUNICIPAL POLICY DRAFT

## PUBLIC SAFETY COMMITTEE EDITS

### 3.0 PUBLIC SAFETY

#### 3.01 PRIORITY ISSUES FOR IMPLEMENTATION

##### Policy.

VLCT supports:

- ~~1.~~ 4. ~~initiatives that address the state-wide shortage of public safety personnel, and creating new ways to recruit and retain those individuals;~~
- ~~2.~~ Law enforcement implementing principles of procedural justice and continued efforts to support:
  - building trust and legitimacy in communities;
  - creating sound policy and oversight mechanisms;
  - best practices in the use of technology and social media;
  - embracing community policing principles to include crime reduction strategies;
  - providing ongoing training and education to employees;
  - emphasizing officer wellness and safety; and
  - providing sufficient funding to make these goals successful.
- ~~3.~~ providing public safety officials with the technology, authority, information, ~~and funding, and revenue-sharing~~ to combat drugged driving and other drug-related crimes; ~~and~~
- ~~3.~~ ~~developing a transparent and comprehensive planning process and collaborative governance structure that includes a broad spectrum of stakeholders to resolve technology issues;~~
4. providing statewide access to complete, affordable cellular and fiber optics service that benefits public safety first responders, and builds the economy; ~~;~~
- ~~5.~~ ~~creating new ways to recruit and retain public safety personnel, both paid and volunteer.~~

~~Recreational marijuana should be taxed and regulated at the local level to address public safety, public health, and local regulatory and budgetary concerns.~~

#### 3.02 CORRECTIONS, MENTAL HEALTH, AND ADDICTION

##### Policy.

VLCT supports:

- ~~1.~~ 4. ~~collaborative solutions to handle incapacitated persons among all affected stakeholders;~~
- ~~2.~~ 30 days' notice to local officials from the DOC of changes in offenders' status, particularly those at risk to re-offend, and collaboration with local officials in placement of a released person;
- ~~3.~~ ensuring that offenders housed in community settings receive reasonable DOC supervision and access to support services that ensures the safety of the community;
- ~~4.~~ adherence to municipal zoning in approving housing for offenders and locating adequate supervision and support services where offenders are lodged near the general population;
- ~~5.~~ clarifying in Title 24 Chapter 117 that temporary housing for offenders is not a "group home"; ~~and~~
- ~~6.~~ authorizing corrections officers to serve citations and domestic abuse orders to offenders in a correctional facility in lieu of municipal police serving such paperwork; ~~and~~
- ~~6.~~ ~~collaborative solutions to handle incapacitated persons between all affected stakeholders.~~

#### 3.03 PUBLIC SAFETY FUNDING

##### Policy.

VLCT supports:

- ~~1.~~ 4. ~~funding to increase the availability of on demand drug abuse and mental health treatment services;~~

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### PUBLIC SAFETY COMMITTEE EDITS

- ~~1.2.~~ authorizing local emergency service agencies to recover all costs associated with complying with any federal, state, or court-ordered licensing, registration, or testing requirement;
2. a moratorium on unfunded training requirements for volunteer first responders;
3. providing funding to municipalities to undertake drug investigations at the local level;
4. the state increasing the Medicaid reimbursement rates to better cover the actual cost of care;
5. providing funding to municipalities that choose to explore consolidate, integrate or regionalize public safety services; and
6. creating a systemic approach that financially supports both call handling and dispatch emergency services.

#### 3.04 PUBLIC SAFETY TRAINING

##### Policy.

VLCT supports:

1. providing adequate funding and resources to the Vermont Fire Academy, Police Academy and the Department of Health for certified training programs and activities for all ~~firefighters that address the needs of volunteer firefighters and~~ emergency services ~~personnel~~[GZ2];
- ~~2. providing adequate funding and resources to the Department of Health for certified training programs and activities for all emergency services personnel;~~
- ~~23.~~ determining if current statutorily mandated training mandates and the associated impacts on public safety personnel and agencies remain current and necessary;
- ~~34.~~ exploring flexible alternatives to the residential Vermont Police Academy recruiter training program; and
- ~~45.~~ providing tuition credits to municipalities that send students to the Vermont Police Academy if those municipalities also contribute instructors or training assistants; ~~and~~

#### 3.056 SAFE DRIVING INITIATIVES

##### Policy.

VLCT supports:

1. directing resources to developing and implementing reliable roadside testing for law enforcement when enforcing incidents of drugged driving;
2. enacting primary enforcement of the seat belt law; and
3. providing for sanctions levied upon a driver under 18 charged with a motor vehicle violation to continue past the driver's 18<sup>th</sup> birthday until the case is adjudicated; ~~and~~
- ~~4. the state's initiatives to address highway safety, particularly with respect to bicyclists, pedestrians, and workers in the highway right of way.~~

#### 3.067 LAW ENFORCEMENT ISSUES

##### Policy.

VLCT supports:

1. allowing a Vermont law enforcement officer to make an arrest based on a warrant from another state;
- ~~2. indemnifying any law enforcement agency that provides field training to a constable;~~
- ~~3. prosecuting as a crime possession of bath salts and, synthetic and designer drugs above a specified quantity;~~
- ~~24.~~ in any discussion of marijuana regulation, addressing the impacts on cities, towns, and villages, including those on school populations, municipal first responders, municipal regulations, and municipal budgets; and
- ~~35.~~ maintaining the independent status and function of the E-911 Board; ~~and Vermont Communications boards.~~



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## 4.0 QUALITY OF LIFE AND ENVIRONMENT

### 4.01 HOUSING

#### Policy.

VLCT supports:

directing incentives and programs to designated downtowns, village centers, new town centers, growth centers, and other areas designated in the adopted municipal plan for growth and development near jobs, services, and amenities.

### 4.02 ACT 250 AND ~~STATE PERMITS~~REGULATORY PROGRAMS

#### Policy.

VLCT supports:

1. delegating responsibility for Act 250 to municipalities ~~demonstrating the professional capacity and willingness to assume responsibility for administration;~~with duly adopted local zoning and subdivision regulations;
2. defining “local impact” and “regional impact” for development projects in Act 250;
3. assigning to district commissions review of only projects with regional impact and projects in municipalities which have adopted neither zoning nor subdivision bylaws; ~~and~~
4. retaining Act 250’s Criterion 10, conformance with a duly adopted local or regional plan or capital program adopted pursuant to 24 V.S.A. chapter 117; ~~and-~~
5. eliminating so-called “legacy only” Act 250 jurisdiction over properties that would not otherwise trigger current Act 250 jurisdiction.
6. using an objective standard based visual impact assessment in place of the Quechee analysis to determine aesthetic value in municipal plans, Act 250 and Section 248.

### 4.03 GROWTH AND LOCAL LAND USE

#### Policy.

VLCT supports:

1. ~~recognizing that~~ adopted regional plans ~~being used as~~ only as guidance documents whose function is to help municipalities implement duly adopted plans at the local level; and
2. balancing environmental standards for relocation of lightly contaminated urban soil with state policy to ~~locate or redevelop~~encourage economic development and housing projects, ~~in compact centers with access to wastewater, water supply, and transportation options instead of in greenfields.~~

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## 4.046 TELECOMMUNICATIONS

### Policy.

#### VLCT supports:

1. —active participation by local governments in a transparent governance structure regulating development of fiber optics service and alternative connectivity solutions; and
2. service that is complete, statewide, and affordable to municipalities, ~~for both the use of public safety first responders, and for,~~ building Vermont's economy, and makes Vermont hospitable for a remote workforce. ~~building Vermont's economy.~~

## 4.054 WASTEMATERIALS MANAGEMENT

### Policy.

#### VLCT supports:

1. holding municipalities harmless from liability for any hazardous material incident at any facility that conforms with all state and federal permits and regulations;
2. regulating complete treatment processes for materials such as wastewater, solid waste, and recyclables through single permits that address the entire treatment cycle at a facility, and issuing permits for facilities based on the useful life or capacity of the facility;
- ~~43. stimulating needed infrastructure investments~~ in downtowns, new town centers, villages, and areas in which state and local policies encourage economic development.

## 4.065 AIR QUALITY AND ENERGY AND ENVIRONMENT

~~Climate change is real, manmade, and affects the environment in the State of Vermont, threatening much of its traditional agricultural, rural, and recreational economy.~~

### Policy.

#### VLCT supports:

1. policies that empower municipalities to reduce local emissions, plan for and ~~improve~~increase resiliency to the effects of climate change, and participate in the transition to a cleaner energy economy;
2. reducing ~~the~~ consumption of fossil fuels;
3. ensuring ~~the~~ reliability of Vermont's energy supply and restoring balance between transitioning to renewable energy and protecting land use priorities established in municipal plans and state land use goals;
4. encouraging the use of solar panels and renewable or energy-efficient measures on buildings where appropriate, installing them without detracting from a building's structural or design integrity, and ensuring that such installations are subject to existing ~~local~~ building and electrical codes and standards;
5. establishing state mechanisms to ensure statewide compliance with Vermont's building codes for energy efficiency without imposing further mandates on municipalities; ~~and~~
6. moving all renewable energy generation projects ~~determinations for facility siting~~ to Act 250 jurisdiction; ~~and-~~
7. the Public Utility Commission giving priority to renewable energy projects whose Renewable Energy Credits remain in Vermont for use by Vermonters.

## 4.06 TELECOMMUNICATIONS

### Policy.

#### VLCT supports:

- ~~—active participation by local governments in a transparent governance structure regulating development of fiber optics service that is complete, statewide, and affordable to municipalities for both the use of public safety first responders and for building Vermont's economy.~~

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## 4.07 HEALTH CARE

~~Opioid addiction is a tremendous and growing crisis that affects municipalities' ability to provide quality of life and municipal services to Vermonters.~~

### **Policy.**

VLCT supports:

1. universal availability of opioid addiction treatment on demand and without delay and the identification of funding sources to provide such services;
2. empowering municipalities to respond to ~~local public health and~~ opioid addiction induced crises in appropriate ways;
3. requiring medical providers to rigorously adhere to medical community-developed and evidence-based protocols and best practices for the prescription of opioids;
4. the “whole population” health care model, which engages partners across many sectors to improve the individual experience of care, reduces per capita cost of care, and improves the health of ~~the~~ populations;
5. refining the health care system to improve the health of Vermonters and manage costs that lead to lower health insurance premiums, allowing more Vermonters to afford health insurance;
6. pursuing universal health care coverage;
7. reducing cost shifts, such as from Medicaid;
8. ensuring health care mandates are paid with public funding and are accessible to all; ~~and~~
9. continuing and expanding health promotion and wellness activities that promote healthy lifestyles and the appropriate use of medical care; ~~and~~;
10. community hospitals capacity to maintain existing medical services.

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## 5.0 WATER RESOURCES

### 5.01 VERMONT CLEAN WATER ACT FUNDING AND IMPLEMENTATION

#### Policy.

VLCT supports:

- ~~14— assuring that funding sources are sufficient to pay for priorities related to the federal and Vermont Clean Water Acts;~~
- ~~accounting for the capacity of potential funding sources to pay for priorities related to the Vermont Clean Water Act in conjunction with programs to which that funding source is already dedicated;~~
2. no risk funding dedicated to early project development including project implementation based upon research, planning, design and scoping—to ensure implementation of a successful projects to implement mandates such as Municipal Separate Storm Sewer System General Permit (MS4), Vermont’s Stormwater Total Maximum Daily Loads (TMDL), Combined Sewer Systems and Municipal Road General Permits (MRGPs).
- ~~Match requirements for funds to support design and scoping should be as attractive and low as possible;~~
3. a statewide authority for centralized collection of impervious surface or per parcel fees, development, and implementation of clean water projects; and
4. using clean water funds to assist municipalities with project planning, development, programming, design, maintenance, scoping, and implementation to ensure proper implementation of clean water programs and mandates, such as the Municipal Separate Storm Sewer System General Permit (MS4), Vermont’s Stormwater Total Maximum Daily Loads (TMDL), and Municipal Road General Permits (MRGPs).

### 5.02 TOTAL MAXIMUM DAILY LOADS (TMDLs)

#### Policy.

VLCT supports:

1. fair, effective, and efficient spending of local, state and federal dollars to achieve TMDL goals ~~and mitigate phosphorus and other TMDL-regulated discharges;~~
2. subjecting potential mitigation efforts to a cost-~~effectiveness~~benefit analysis, with implementation based on that analysis;
- ~~3. directing the Agency of Natural Resources (ANR) to work closely with the U.S. Environmental Protection Agency (EPA) to implement reasonable TMDLs for Lake Champlain and other Vermont waters;~~
- ~~34.~~ reducing runoff from non-point sources of pollution on all property by state and local governments, developers, farmers, and other stakeholders;
- ~~45.~~ requiring ANR to automatically re-issue municipal permits for five-year terms if they have been expired without renewal for more than 180 days~~three years~~; and
- ~~6.~~ ensuring wastewater facility discharge limits are based upon permitted waste load allocations and
- ~~57.~~ timely responses from ANR at all levels and in all programs regarding conditions required in permits, and clear guidance for implementing conditions.

VLCT opposes

1. re-opening facility permits so as to amend them before their five-year terms expire; and
2. adjusting wastewater treatment facility permit discharge limits to reflect their historical performance.

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## 5.03 POTABLE WATER AND WASTEWATER SYSTEM PERMITTING

### Policy.

VLCT supports:

1. ANR enforcing the provisions of the Wastewater System and Potable Water Supply Program, including requirements to repair or replace failed on-site septic systems;
2. increased funding to assure public health by ensuring high quality potable water supplies;
3. in-state solutions to handling wastewater residuals and bio-solids ~~by, particularly~~ providing for continued land application while preserving valuable and limited in-state landfill space;
4. ~~redefining the term “waters of the state” to exclude constructed waterworks, sources of public water supplies, reservoirs, settling ponds and any infrastructure related to water supplies;~~
4. ~~developing standards for the Combined Sewer Overflow rule that recognize the benefits of combined sewers; and~~
5. managing drinking water treatment residuals ~~separately from outside of~~ wastewater residuals rules.
6. ~~addressing emerging contaminants in a science-based manner.~~

## 5.04 PRIORITIZATION TO IMPLEMENT ENVIRONMENTAL PROJECTS

### Policy.

VLCT supports:

1. ~~ANR and EPA implementing the Integrated Planning Approach Framework~~ so municipalities can prioritize and schedule municipal Clean Water Act responsibilities and investments in compliance activities according to greatest need, notwithstanding statutory limits;
2. requiring ANR to use a system similar to the Integrated Planning Approach Framework that provides for allows municipalities to prioritize permitting requirements and schedule municipal investments in achieving compliance based on financial ability, ~~notwithstanding statutory limits~~; and
3. limiting the rights of third parties to appeal approved integrated planning and implementation schedules.