

TOWN OF WEATHERSFIELD

LAND USE ADMINISTRATOR'S OFFICE

802)674-2626

P.O. BOX 550 ASCUTNEY, VT 05030

landuse@weathersfield.org

Planning Commission Agenda Martin Memorial Hall – 5259 Route 5, Ascutney, Vermont 05030 Remote option – Zoom details below Monday, April 10, 2023 – 6:30 PM

- 1. Call to Order
- 2. Agenda Review
- 3. Comments from the Chair and Land Use Administrator
- 4. Comment from citizens regarding items not on the agenda
- 5. Approval of Meeting Minutes March 27, 2023
- 6. **PUBLIC HEARING Town Plan Amendment Energy Section:** No update Rev. 8 03.08.2023
- 7. **Bylaws PUD Review:** No update Rev. 5 02.22.2023
- 8. Helipads, Airstrips, and Airports: Information and inquiry from MARC
- 9. Vermont Planners Association Legislative Report: 04.04.2023
- 10. Discussion of items for future agendas
- 11. Any other business that can be legally discussed
- 12. Adjourn

The next regularly scheduled meeting of the Planning Commission will be **Monday**, **April 24**, **2023 - 6:30 PM**, Martin Memorial Hall.

Due to public demand and COVID-19; the Town has changed its public meeting platform from GoToMeeting to Zoom. For computer access, please go to this website, where you will find instructions and links to the meeting: https://www.weathersfieldvt.org/home/news/public-meetings-zoom

To join any public meeting via phone, dial (929) 205-6099. When prompted, enter meeting ID 542-595-4364. You will not have a participant ID. Please press # when prompted to skip this section. The passcode for all meetings is 8021.

RE: Solar

Jason Rasmussen < jrasmussen@marcvt.org >

Wed 2/22/2023 1:53 PM

To: Land Use <Landuse@weathersfield.org>

Cc: Martha Harrison < mharrison@marcvt.org>

I have heard arguments on either side of that question. However, I think exempt means exempt from <u>all</u> zoning provisions, including setbacks.

Please note that statute has setbacks for Section 248 projects (see below).

Jason

- (s) This subsection sets minimum setback requirements that shall apply to in-state ground-mounted solar electric generation facilities approved under this section, unless the facility is installed on a canopy constructed on an area primarily used for parking vehicles that is in existence or permitted on the date the application for the facility is filed.
 - (1) The minimum setbacks shall be:
- (A) from a State or municipal highway, measured from the edge of the traveled way:
 - (i) 100 feet for a facility with a plant capacity exceeding 150 kW; and
- (ii) 40 feet for a facility with a plant capacity less than or equal to 150 kW but greater than 15 kW.
 - (B) From each property boundary that is not a State or municipal highway:
 - (i) 50 feet for a facility with a plant capacity exceeding 150 kW; and
- (ii) 25 feet for a facility with a plant capacity less than or equal to 150 kW but greater than 15 kW.
- (2) This subsection does not require a setback for a facility with a plant capacity equal to or less than 15 kW.
 - (3) On review of an application, the Commission may:
 - (A) require a larger setback than this subsection requires;
- (B) approve an agreement to a smaller setback among the applicant, the municipal legislative body, and each owner of property adjoining the smaller setback; or
- (C) require a setback for a facility constructed on an area primarily used for parking vehicles, if the application concerns such a facility.
 - (4) In this subsection:

- (A) "kW" and "plant capacity" shall have the same meaning as in section 8002 of this title.
- (B) "Setback" means the shortest distance between the nearest portion of a solar panel or support structure for a solar panel, at its point of attachment to the ground, and a property boundary or the edge of a highway's traveled way.

From: Land Use <Landuse@weathersfield.org>
Sent: Wednesday, February 22, 2023 11:57 AM
To: Jason Rasmussen <jrasmussen@marcvt.org>
Cc: Martha Harrison <mharrison@marcvt.org>

Subject: Re: Solar

It does, thank you. In any case, do setbacks apply?

From: Jason Rasmussen < jrasmussen@marcvt.org>
Sent: Wednesday, February 22, 2023 9:11 AM
To: Land Use < Landuse@weathersfield.org>
Cc: Martha Harrison < mharrison@marcvt.org>

Subject: RE: Solar

Hi Ryan,

Essentially, if a project is grid-tied and needs approval by the PUC, it is exempt from local zoning. See the statutory excerpt below. In those cases, the Town Plan would be referred to by the PUC and the town could intervene in the PUC proceeding. I have found that the most influence a town has, is usually when a solar project seeks a letter of support for so-called "preferred site" designation under the state net-metering rules. There are different thresholds under the net-metering rules; see: https://puc.vermont.gov/document/commission-rule-5100-rule-pertaining-construction-and-operation-net-metering-systems.

The town (i.e. both the Selectboard and Planning Commission) should be notified in the case of any PUC proceeding.

For smaller or non-net-metered projects, local zoning may be required, as specified in your bylaws.

I hope that helps.

Jason

24 V.S.A. § 4413 Limitations on municipal bylaws

(b) A bylaw under this chapter shall not regulate electric generation facilities, energy storage facilities, and transmission facilities regulated under 30 V.S.A. § 248 or subject to regulation under 30 V.S.A. § 8011.

From: Land Use <<u>Landuse@weathersfield.org</u>>
Sent: Wednesday, February 22, 2023 8:15 AM
To: Jason Rasmussen <<u>jrasmussen@marcvt.org</u>>

Subject: Solar

Hi Jason,

Would you be able to share anything with me to explain how solar is regulated and how municipalities are limited? I think I understand the larger 150Kw+ projects that are subject to sec 248 and review by the PUC but what about smaller units? Are they exempt from zoning; can we require permits or notification? What statutes are applicable?

Thanks, Ryan

<u>Key</u>

Black: Original remaining text

Red stricken: Original removed text

Green underlined: New added text

Yellow highlighted: Changes since last revision

Article 5: Development Review

5.1 Application Submission Requirements

An application for a zoning permit shall be filed with the Administrative Officer on form(s) provided by the municipality. Required application fees, as set by the Legislative Body, also shall be submitted with each application.

5.1.3 PUD Review Application

Applications for PUDs shall include the following, in addition to the information required for subdivisions:

- a) **Application Form**: Supplied by the Administrative Officer; signed by the owner of record and, in the case of a non-owner applicant, by the applicant:
- b) **Site Plan**: A site plan shall meet all of the requirements of Section 5.1.2(b) of these bylaws.
- c) **Project Narrative**: A description of the proposed project shall be required as part of a complete application. Also required is a narrative that is clear and succinct and includes:
 - 1. SUMMARY: A brief summary of the project and how it meets the PUD standards in this section;
 - 2. EXCEPTIONS: A statement describing all proposed modifications, changes, or supplements to requirements in the Zoning Bylaws. Any such modification approved under this section shall be specifically set forth in terms of standards and criteria for the design, bulk and spacing of buildings and the sizes of lots and open spaces which shall be required and these shall be noted or appended to the plat;
 - 3. MANAGEMENT: A sound proposal for the financing and membership of the management organization which will maintain and operate the property in common ownership, such as community facilities, private roads, and/or open spaces; and,
 - 4. PHASING PLAN: Projects that will take more than 24 months to complete must present a description and clear plan for the project's phasing, including the area, uses, and timing of each phase. In any case, the sketch plan shall show the complete project.
 - 5. Additional information required by the Planning Commission to determine whether the proposed mix of uses, density and scale and intensity of uses will meet the standards set forth in these Zoning Bylaws.
- d) **Application Fees**: All applicable fees must be paid as part of a complete application.
- e) PUD applications may involve single or multiple parcels and one owner or multiple owners under a common application.
- f) PUD applications are subject to approval by the Planning Commission in accordance with the requirements of Section 5.4 in these Bylaws.

5.45 Planned Unit Development

An applicant for PUD approval applies to the Administrative Officer, who in turn notifies the Planning Commission. The Commission has up to sixty days to hold a public hearing, and sixty after that to approve, approve with conditions, or disapprove the application based on Standards of Review in these Bylaws. Failure to act within sixty (60) days of the hearing shall be deemed approval. Prior to filing a formal application, the applicant is encouraged to meet with the Commission to discuss the project. Notice for a combined review hearing shall be made in accordance with 24 V.S.A. §4464(a)(1).

The hearing notice shall include a statement that the hearing will be a combined review of the proposed project and list each review process that will be conducted at the hearing. As applicable, the combined review process shall be conducted in the following order:

- a) Site Plan Review
- b) Access by right-of-way
- c) Requests for Waivers
- d) Requests for Variances
- e) PUD Review
- f) Subdivision Review (preliminary and final)
- g) Conditional Use Review

All hearing and decision requirements and all deadlines applicable to each review process shall apply. Separate written decisions may be issued for each review conducted as part of the combined review, but shall be coordinated where appropriate.

In accordance with the provisions set forth in Section 4417 of The Act, Planned Unit Developments (PUDs) are allowed to permit flexibility in the application of the Zoning Bylaws for the purposes of Section 4302 of The Act and in conformance with the Weathersfield Town Plan.

5.4.1 *Purpose*

- a) To allow for multiple principal uses on a single parcel of land.
- b) To encourage compact, pedestrian-oriented development and redevelopment, and to promote a mix of residential uses or nonresidential uses, or both, especially in downtowns, village centers, new town centers, and associated neighborhoods.
- c) To implement the policies of the municipal plan, such as the provision of affordable housing.
- d) To encourage any development in the countryside to be compatible with the use and character of surrounding rural lands.
- e) To provide for flexibility in site and lot layout, building design, placement and clustering of buildings, use of open areas, provision of circulation facilities, including pedestrian facilities and parking, and related site and design considerations that will best achieve the goals for the area as articulated in the municipal plan and bylaws within the particular character of the site and its surroundings.
- f) To provide for the conservation of open space features recognized as worthy of conservation in the municipal plan and bylaws, such as the preservation of agricultural land, forest land, trails, and other recreational resources, critical and sensitive natural areas, scenic resources, and protection from natural hazards.
- g) To provide for efficient use of public facilities and infrastructure.
- h) To encourage and preserve opportunities for energy-efficient development and redevelopment.

5.4.2 Applicability

- a) The PUD provisions may be applied to any land development in any zoning district within the Town of Weathersfield at the request of the applicant.
- b) Uses shall be limited to those permitted and conditional uses within the district in which the PUD is proposed.

5.4.3 PUD Review Procedures

- a) Complete applications for PUDs must include the information specified in Section 5.1.
- b) PUD applications shall be reviewed under the Subdivision Application Procedures set forth in Weathersfield's Subdivision Regulations, as most recently amended.
- c) Approval granted under this section for a PUD that involves the development of one or more uses requiring approval under conditional use review (Section 5.3) does not exempt the proposed development from both review processes, although various reviews by the ZBA for PUDs may be reviewed separately or concurrently.
- d) The order of PUD review will be:
 - 1. Planning Commission Sketch Plan Review
 - a. Planning Commission shall determine the bylaw modifications to be used in further reviews
 - Zoning Board of Adjustment Site Plan Review, Conditional Use Review, other reviews administered by the ZBA
 - 3. Planning Commission Preliminary Review (if required by PC)
 - 4. Planning Commission Final Plat Review

5.45.41 General Standards

In addition to the standards set forth in Weathersfield's Subdivision Regulations, the following general standards must be met in order for the Planning Commission to approve a PUD application:

- a) PUD is consistent with Town Plan.
- b) All Site Plan Review requirements in Section 5.23 have been met.
- c) The PUD is an appropriate and unified singular treatment for the proposed development.
- d) The development is designed so as to be compatible with the character of the area. Particular attention will focus on the aural and visual impacts.
- <u>d)e)</u> State and local standards for fire and safety regulations by local fire and police officials are in compliance.
- e)f) Adequate water supply and sewage disposal facilities are provided.
- flg) The development will not place an undue burden on municipal services.

5.4.5 Standards for Non-residential PUDs

- a) <u>DENSITY:</u> The density requirements do not exceed the number of units permitted if the land were subdivided in accordance with district regulations.
 - 1. For PUDs not requiring a subdivision, the number of uses or units of the same use will be equal to the number of subdividable lots pursuant to 5.4.5(a) of these bylaws.
- b) USE: All compatible uses allowed in the sites district are allowed as part of a non-

- residential PUD. The ZBA may determine if any proposed uses are not compatible. A non-residential PUD may include residential dwelling units.
- c) OPEN SPACE: At least 1 acre of open space shall be dedicated for the use of the residents, owners or employees.

5.4.6 Standards for Residential PUDs

- a) DENSITY: The total number of dwelling units in any Residential PUD must not exceed 125% of the number of lots into which the parcel could be legally subdivided and developed based upon minimum lot size requirements and all other applicable bylaws.
- b) USE: Only residential and residential accessory uses shall be permitted within a Residential PUD.
- c) DEVELOPMENT: Of the land left open within the Residential PUD for common usage or ownership, no more than 25% shall be developed for community facilities (excluding subsurface installations), access road, parking areas, or recreational structures.
- d) OPEN SPACE: A minimum of 33% of the total applicable property shall be designated for open space or community facilities.
 - 1. Open space shall be designated as private (for the benefit of the residents of the PUD), or public (for the benefit of the municipality and its citizens).
 - 2. Land set aside as open space shall be of a size, type and location to meet its intended use.
 - 3. Open space should be contiguous to other existing or potential open space areas.
 - 4. Ownership of open space should be consistent with the best means of maintaining the resources on site.

5.5.2 Modification of Zoning Regulations

After a duly-warned public hearing (per Section 6.3), simultaneously with subdivision approval, and subject to the standards and conditions set forth in this section, the Planning Commission may modify the zoning district regulations for the proposed PUD as to the following requirements only:

- a) Setbacks, including provision for zero lot lines;
- b) Height, Bulk and Spacing of Buildings;
- c) Type of Building, including a mix of residential and commercial uses in one building, a variety of residential structures (one, two, and multi-family structures).
- d) Location of buildings; and
- e) Size of lots.

Any modification of the Bylaws for the proposed PUD granted by the Planning Commission shall be noted on the subdivision plat.



February 10, 2021

Re: Permitting Helipads and Airstrips

Dear Municipal Manager & Planning Commissioner:

The Vermont Transportation Board serves as the state permitting authority for airports and restricted landing areas. Restricted landing areas include private helipads and airstrips but do not include regulation of drones. Over the last few years, the Board has seen a significant increase in applications for private helipads and airstrips, often serving a single home in an existing subdivision or neighborhood. These private facilities can dramatically change the character of an area and can have negative impacts while providing a private benefit to few.

The State, as part of its permit process, requires that a proposed helipad or airstrip first receive municipal approval. But in the vast majority of cases that come before the Board, the host city or town has no regulatory mechanism to review such applications. In these cases, court guidance tells us the State must accept the application and proceed as if municipal approval has been granted. While this allows the application to proceed, it essentially shorts the permit process because the Transportation Board has no authority to review land use. This means that private helipads and airstrips often gain approval without any kind of local process that determines whether the proposed location is compatible with the surrounding area.

In short, the State's permitting process for a helipad or airstrip is designed to have three review components: 1) the local municipality reviews land use, 2) the State reviews ground-related safety to determine if aircraft can take-off and land safely, and 3) the U.S Government reviews the airspace to ensure safety once the aircraft is airborne. Given this regulatory structure, if the host municipality has no policy language in its adopted plan or no established regulatory mechanism, such as zoning bylaws that deal with aviation or a stand-alone municipal bylaw that deals with aviation, land-use issues and neighborhood concerns go unchecked.

Realizing this, the Board convened a committee comprised of municipal planers, regional planners, VTrans staff and a representative of the Vermont League of Cities and Towns to develop guidelines to help municipalities understand what they can do to establish a local, regulatory mechanism that deals with helipads and airstrips should one be proposed within your municipality.

The committee, as well as the Transportation Board, encourages all Vermont cities and towns to consider adopting municipal plan policies and/or bylaws regarding aviation facilities as recent history shows that applications for private helipads and airstrips are increasing. Vermont is regularly seeing



applications all across the state, and often for locations within or close to village settings or in existing residential neighborhoods in rural communities.

What follows are some suggestions on what to consider should your community wish to better prepare itself for such an application. Transportation Board Executive Secretary John Zicconi is willing to meet with any town (municipal manager, selectboard, planning commission, etc.) to discuss this issue further. Inquiries can be made directly to him at 802-343-7280 or at john.zicconi@vermont.gov.

MUNICIPAL PLANS

Municipal plans establish the policy basis for zoning bylaws, but they also have regulatory effect in state permitting processes, such as Act 250 (land use) and Section 248 (energy generation and transmission). Including explicit, prescriptive policy language in the municipal plan about where private helipads and airstrips are and are not allowed establishes a policy basis for municipal approval. Prescriptive policy language uses words such as will and must as opposed to more passive words such as consider, should, support, and encourage. If a municipality uses a municipal plan to either approve or deny a helipad or airstrip, the Transportation Board requires a letter from the municipality explaining its decision with reference to the section of the municipal plan used.

ZONING BYLAWS & ORDINANCES

Many Vermont towns have zoning, but not all zoning regulations capture helipads and airstrips. The Transportation Board encourages municipalities to review their zoning regulations to determine if they cover private aviation facilities which can be proposed in residential as well as commercial districts. Detailed zoning regulations may take the following tools into account.

Setbacks – establish a minimum for helipads and airstrips, which may vary depending on the zoning district. There is no magic number of feet a setback should be.

Lot Size – there is no common or recommended lot size. Helicopters can land in very small spaces. Appropriate lot sizes also may vary by type of zoning district as one size may be appropriate for a commercial district while a different minimum size may be more appropriate for a residential district. For airstrips, the U.S. Government sets minimum runway lengths necessary depending on the class of aircraft to be flown.

Noise – federal law prohibits states or municipalities from considering or regulating aircraft noise. Aircraft noise is the sole domain of the federal government. However, municipalities can regulate land uses and the character of an area so long as they are not used as a proxy for limiting aircraft noise.



For example, courts have held that regulating hours of an airport's operation is a proxy for regulating aircraft noise.

Permitted Use – if a community wishes to allow helipads and airstrips they can be allowed in some or all zoning districts.

Conditional Use – can address the character of the area, performance standards, and land uses so long as they are not a proxy for noise.

Accessory Use – helipads and airstrips can be allowed as incidental or subordinate uses to the property's primary use.

Prohibited Use – municipalities with proper regulatory tools can prohibit helipads and airstrips throughout town, or they can prohibit them only from specific areas of town or within specific zoning districts.

Exemptions – zoning can prohibit helipads and airstrips but also exempt certain aviation uses – such as crop dusting and insect control – from needing a local permit. The State and the U.S. Government may still be required to review such uses, but municipalities if they wish can exempt specific uses from needing local approval. None of this, however, would prohibit an aircraft that must land due to an emergency as federal law for safety purposes allows that to occur anywhere necessary.

Screening & Visual Impact – while planting trees and shrubs to screen certain development is commonplace within zoning, keep in mind that aircraft require specific glideslopes with specific ground-to-air clearance ratios (helicopters require an 8-to-1 horizontal to vertical clearance) to land and takeoff safely. Thus, trees or other structures cannot be placed too close to the actual landing facility. Also, zoning can establish how aircraft can be parked and other associated visual parameters.

Surface Type – certain aircraft can land on almost any kind of surface. Some towns require helipads to be paved and maintained free from dust, dirt and other loose material that could be blown onto adjoining properties by the air wash.

Runway Length – while helicopters can land in very small spaces – including on top of buildings – specific class of airplanes require specific runway lengths. As a result, zoning must understand what type of aircraft class is acceptable and then ensure the regulations allow for proper runway length.

Additional Permitting – Vermont statute requires that municipal approval be obtained <u>prior</u> to applying for a State Aviation permit, so local regulations should not require State approval be obtained



first. Local regulations can, however, require that obtaining a State Certificate of Operation is required prior to the commencement of local flights.

STAND-ALONE MUNICIPAL BYLAW

Municipalities that do not have zoning can still regulate helipads and airstrips. Statutes allow for a standalong bylaw under Title 24 Chapter 117. As another option, statute allows for an ordinance under Title 24 Chapter 59. The above zoning guidelines also can be used to help guide communities wishing to establish such bylaws or ordinances.

QUESTIONS

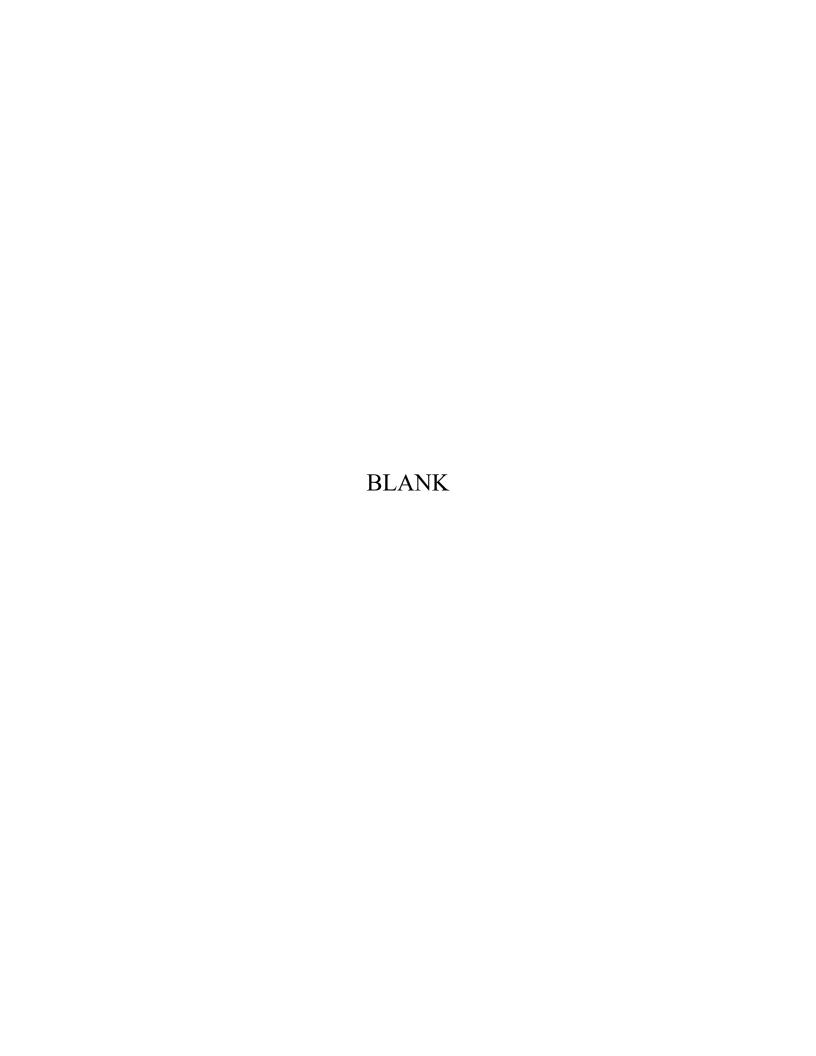
In closing, the Transportation Board emphasizes that its executive secretary is happy to answer any questions you may have regarding helipads and airstrips, and is willing to meet with your local planning commission, selectboard or whatever other entity is responsible for drafting local zoning regulations and municipal ordinances. The Board has seen many examples of Vermont communities being caught off guard when application for a Restricted Landing Area is made and witnessed the shock local residents have when they learn the municipality has no way to determine for itself if such a facility is appropriate for their community.

As a result, the Board encourages all Vermont communities to discuss this issue and decide if its local permitting processes is adequate when it comes to siting helipads and airstrips. The Board hopes you find the enclosed information helpful, and it is happy to assist any city or town to help it better understand the issue.

Sincerely,

John B. Zicconi

Executive Secretary, Vermont Transportation Board



Airport Overlay

Otis Munroe <omunroe@marcvt.org>

Tue 3/28/2023 1:22 PM

To: Land Use <Landuse@weathersfield.org>

Hi Ryan,

I was at a Springfield Airport Commission meeting last week and they were wondering what the status was of Weathersfield's airport approach overlay district. I remember there was talk of adopting one some time ago but we lost track of that conversation over here. Is that still in the works?

Thanks, Otis

Vermont Planners Association (VPA) Legislative Report – April 4, 2023

Reported by Alex Weinhagen, Kati Gallagher, Kerry Brosnan, and Darren Schibler

We are still waiting for the crossover dust to settle, and updates to the Legislature's website to reflect bills that passed. Discussions will continue on key bills moving from one chamber to committees in the other chamber - e.g., S.5, S.100, H.126, etc.

No new bills with a planning nexus were introduced.

<u>Updates on planning bills</u>

- **S.100 Omnibus Housing Bill** This bill passed the full Senate on Friday (3/31) with a few amendments. We are still waiting for the version as passed to be published on the Legislature's website. Some problematic provisions related to municipal zoning pre-emption (e.g., parking minimums, residential density minimums) are still in the bill, so it will be important for planners to engage with their legislators and key committees on the House side to recommend revisions. The bill appears to be landing first in the House Committee on General and Housing. They will get an introduction to the bill on Tuesday (4/4), with substantive discussion and testimony to follow next week or thereafter. This is likely to be the committee most receptive to the concerns VPA and individual planners have raised. Once the bill makes it through this committee, it will likely head to the House Committee on Environment and Energy.
- **S.115 Misc.** Ag & Stormwater Provisions This bill is scheduled for a third reading and final vote in the Senate on Tuesday (4/4). As reported las week, this bill includes a provision to exempt agricultural operations from regulation and fees by municipal stormwater utilities with the intent of better aligning with statutory limits as interpreted by the Agency of Agriculture. After concerns were raised by several municipal officials, the problematic sections were amended to study the issue and report back on necessary solutions by the end of the year, so that action can be taken in 2024 if necessary.
- **S.5 Affordable Heat Act** As reported last week, this bill passed the Senate on March 3, and is now being considered by the House Environment and Energy Committee. The committee has a full week of testimony and discussion planned for this week.
- **H.126 Biodiversity & Conservation** As reported last week, after some amendments, this bill was approved by the full House on 3/24, and now is now waiting to be taken up by the Senate Natural Resources & Energy Committee.
- **H.276 Rental Registry Study** This greatly revised bill passed the House on Thursday (3/30), and is now awaiting consideration by the Senate Committee on Economic Development, Housing, and General Affairs. VPA will be submitting a letter of support for the rental registry concept, in the hopes that it can actually be enacted in 2024. As reported last week, this is now a study bill. The study would assess cost, design, and implementation of a registry and consider the different possible ways to do it. Two frameworks were laid out to be explored; one using an existing framework with landlord certificate and

associated data and one using a new framework for an annual registration requirement for long term and short term rental housing. The report will be due Dec 15th, 2023.

H.222 – Reducing Overdoses / Recovery Residences – This bill passed the House on Wednesday (3/29), and is now awaiting consideration by the Senate Committee on Health and Welfare. As reported last week, one portion of this bill would require municipalities permit recovery residences as a single-family dwelling, similar to residential care homes and group homes. H.222 includes extensive details on how recovery residences would operate internally, which has evolved over the past few sessions. It was amended to include the definition of "recovery residence" that was part of H.241.

H.31 – Aquatic Nuisance Control – This bill passed the House on Wednesday (3/29), and is now awaiting consideration by the Senate Committee on Natural Resources and Energy. As previously reported, this bill creates a study committee to look into the use of pesticides for the control of aquatic nuisances (e.g., Eurasian water milfoil).

Online Resources

<u>Bill, Act and Resolution search page</u>, past <u>VPA Legislative Reports</u>, upcoming <u>House / Senate Committee</u> <u>Meetings</u>, and the weekly <u>VLCT legislative report</u>.