

**WARNING TOWN OF HARDWICK
SPECIAL TOWN MEETING MAY 19, 2026**

The legal voters of the Town of Hardwick, Vermont are hereby notified and warned to meet at the Hardwick Town House in said Town of Hardwick on Tuesday, May 19, 2026 at 6:30 o'clock in the evening to act on the following business:

Article 1. Shall the Town contribute \$25,000, to be matched by more than \$700,000 of other public and private funds, toward the acquisition of +/- 329 acres of land on Buffalo Mountain to become a Town Forest to protect recreational access, fish and wildlife habitat, forestry, and Lamoille River water quality, and to provide outdoor educational opportunities for schoolchildren?

Article 2. Shall the Town vote to require that all future voting at Annual and Special Town Meetings be conducted exclusively by Australian ballot?

Article 3. To transact any other nonbinding business proper to be brought before said meeting.

The legal voters of the Town of Hardwick are further notified that voter qualifications, registration, and absentee voting relative to said Special Town Meeting shall be as provided in Chapters 43, 51 and 55 of Title 17, Vermont Statutes Annotated.

Dated at Hardwick, Vermont this 13th day of April, A.D. 2026.

Ceilidh Galloway-Kane, Chair

Shari Cornish, Vice Chair

Timothy Ricciardello

Larry Fliegelman

Derek Richardson

Hardwick Town Clerk's Office. Received for record this 13th day of April, A.D. 2026 at _____ a.m., the instrument of which the foregoing is a true copy.

Attest: Tonia L. Chase, Town Clerk: _____

FEMA Funding Options for Wastewater Plant

Background

The Town's wastewater treatment plant experienced flooding in 2023 and 2024. FEMA has provided multiple funding pathways for recovery and future mitigation.

Since initial evaluation, discussions with a third-party consultant have clarified strategy and sequencing options.

Option 1: FEMA 428 (Fixed Cost / Alternate Procedures)

Overview:

- Fixed funding amount: **\$8.2 million**
- Provides flexibility in project design and location
- Allows combination with other funding sources

Advantages

- Maximum flexibility (relocation, redesign, or elevating facility)
- Ability to combine with other funding sources (grants, loans, USDA, etc.)
- Potential to use leftover funds for additional hazard mitigation
- Reduced administrative burden compared to standard FEMA process
- More predictable total funding amount

Disadvantages / Risks

- Town is responsible for all cost overruns above \$8.2M
 - Estimate is over a year old and may not reflect current construction costs
 - Inflation risk (potential 20–30% increase in costs)
 - Locks the Town into a funding cap immediately
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Option 2: FEMA 406 (Standard Public Assistance) Recommended Starting Path

Overview:

- FEMA reimburses up to *90% of actual eligible costs*
- Designed to restore facility in-kind (with code and standard upgrades)

Advantages

- Significantly reduced financial risk to the Town
- Protection against inflation and cost increases
- FEMA shares in cost overruns
- Allows time to fully design the project before committing to a capped amount
- Provides a strategic off-ramp to an Improved Project if needed

Disadvantages / Limitations

- Limited flexibility (typically must rebuild in current location unless amended)
 - High administrative and documentation burden
 - Slower project timeline due to FEMA oversight
 - Cash flow gap: Town must front project costs before reimbursement – we might need to get a line of credit for this
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Option 3: 406 Improved Project (Future Conversion Option)

Overview:

- Can be pursued *after starting under 406*
- Applies FEMA funding to an alternative project (e.g., relocation)
- Funding becomes capped at the revised estimate of the in kind codes & standards repair

Key Insight

- The total cost of the codes & standards repair would be capped
- This makes it functionally similar to a 428 but decided later with better cost certainty

Limitations

- Must maintain same function and capacity
- More administrative tracking than 428
- Mitigation funding may not transfer if relocating

Consultant Comparison Table

Category	Section 428 (Fixed-Cost / Alternative Procedures)	Standard FEMA PA Process	Improved Project Process
Funding Basis	Fixed-cost amount set upfront	Reimbursement based on actual costs	Reimbursement capped at amount of eligible codes and standards (C&S) repair
Funding Certainty	Guaranteed capped amount	Adjusts as costs are incurred	Capped at C&S repair or actual costs of Improved Project, whichever is lower
Cost Overruns	Applicant responsible for overruns	FEMA may cover eligible overruns	Applicant responsible for overruns
Cost Savings	Applicant can keep savings	Savings reduce reimbursement	Savings reduce reimbursement
Flexibility of Scope	High flexibility to modify project	Must follow approved scope of work closely	Must follow approved scope of work for approved Improved Project
Scope Changes	Limited after approval; must notify FEMA	More flexibility to revise with approval	Limited after approval; must notify FEMA
Hidden Damage	No additional funding allowed	Can request additional funding	No additional funding after approval of Improved Project
Appeals	Very limited appeal rights	Full appeal rights available	Full appeal rights available
Time Extensions	No appeals on time extensions	Extensions and appeals may be allowed	Extensions and appeals may be allowed
Hazard Mitigation Funding	Must complete or funds are deobligated	More flexible handling	Can be included to protect damaged elements only and does not apply to Improved portion.
Environmental (EHP)	Full EHP review and compliance for actual project performed	Full EHP review and compliance for actual project performed	Full EHP review and compliance for actual project performed
Administrative Burden	Lower (less documentation after award)	Higher (ongoing documentation & tracking)	Higher (ongoing documentation & tracking)

This table reflects detailed cost scenarios, assumptions, and funding comparisons across 428, 406, and Improved Project options.

Key Strategic Takeaway

Start with 406, preserves flexibility:

- If costs stay reasonable → remain in 406 and FEMA shares cost risk
- If costs escalate → convert to Improved Project (cap applies at that time)
- Avoids committing early to a potentially outdated \$8.2M estimate

Recommendation

Based on updated analysis and consultation, the recommended approach is:

- ➔ Begin with FEMA 406 (Standard Public Assistance)
- ➔ Maintain the ability to convert to an Improved Project after design is complete if needed

Rationale

- Allows the Town to complete design and obtain accurate cost estimates before committing to a capped funding structure
 - Provides protection against inflation and cost escalation during early project phases
 - Preserves flexibility to:
 - Remain in 406 if costs are manageable
 - Convert to an Improved Project if relocation or redesign becomes necessary
 - Avoids locking the Town into an outdated \$8.2M estimate too early
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