

MEMORANDUM

To: Northeast Kingdom Regional Planning Commission Staff

From: Kristen Leahy, Zoning & Floodplain Administrator / Resilience & Adaptation Coordinator, Town of Hardwick

Re: Housing Capacity and Buildout Analysis for Municipal Plan Housing Targets

Date: June 2026

The Town of Hardwick appreciates NVDA's willingness to assist in developing a housing capacity and buildout analysis to support the Municipal Plan update and the State-required housing target assessment.

As discussions move forward, the Town would like to clarify its expectations regarding the scope and purpose of the analysis.

The primary objective is to develop a defensible, planning-level assessment of Hardwick's housing capacity that can be incorporated into the Municipal Plan and used to evaluate the Town's ability to accommodate assigned housing targets. The analysis should document both opportunities and constraints affecting future housing development and provide a transparent methodology that can be understood by municipal officials, residents, and State agencies.

The Town is seeking a housing capacity analysis rather than a simple zoning yield calculation. While zoning capacity is an important component of the analysis, the Town believes that realistic housing capacity must also consider environmental constraints, infrastructure limitations, redevelopment potential, local development conditions, and long-term community resilience considerations.

At a minimum, the analysis should include the following components:

1. Existing Housing Conditions

- Existing housing inventory
- Recent housing production trends
- Housing units lost through demolition, flooding, and buyouts
- Current development proposals and known housing projects

2. Development Constraints Analysis

The analysis should identify and quantify lands affected by:

- FEMA Special Flood Hazard Areas
- Floodways
- River Corridors
- Wetlands
- Steep slopes
- Conserved lands
- Public lands
- Other significant environmental or physical constraints

Where possible, constrained acreage should be distinguished from potentially developable acreage.

3. Infrastructure Assessment

The analysis should evaluate:

- Water service availability
- Wastewater service availability
- Known infrastructure limitations
- Areas requiring significant infrastructure investment to support growth
- Stormwater considerations where relevant

The presence of municipal water and wastewater infrastructure should not automatically be assumed to indicate unlimited development capacity.

4. Resilience and Adaptation Considerations

The Town requests that the analysis evaluate housing opportunities through the lens of long-term flood resilience and community adaptation.

The analysis should identify:

- Areas that may be suitable to accommodate future residential growth outside of significant flood and erosion hazard areas ("receiving areas")

- Areas where future housing development would support long-term community resilience objectives
- Opportunities to align future housing development with existing or planned municipal infrastructure investments
- Areas where floodplain restoration, property acquisition, or other resilience initiatives may reduce future housing capacity
- Potential relationships between future housing opportunities and ongoing flood recovery, hazard mitigation, and resilience planning efforts

The Town recognizes that housing development decisions involve numerous factors beyond flood resilience. The purpose of this assessment is not to restrict development but to better understand how future housing opportunities may support long-term community adaptation goals.

Where feasible, the analysis should identify areas that may be well-positioned to accommodate future housing growth while reducing exposure to known flood and erosion hazards.

5. Parcel-Level Capacity Assessment

The analysis should identify:

- Vacant developable parcels
- Underutilized parcels
- Redevelopment opportunities
- Infill opportunities
- Potential locations for missing-middle housing
- Potential accessory dwelling unit opportunities

The Town requests that local staff be provided an opportunity to review preliminary parcel-level findings before the analysis is finalized.

6. Housing Capacity Scenarios

The Town recommends that the analysis include multiple capacity estimates, including:

- Theoretical zoning capacity
- Constrained capacity after environmental and infrastructure limitations are considered

- A realistic planning-level capacity estimate

Providing multiple scenarios will improve transparency and help distinguish between theoretical zoning potential and likely development outcomes.

7. Housing Target Assessment

The final report should compare the resulting housing capacity estimates to State-assigned housing targets and identify:

- Areas where capacity exists
- Barriers to development
- Infrastructure investments that could increase capacity
- Policy actions that could facilitate additional housing
- Potential receiving areas for future residential growth
- Infrastructure, planning, or policy actions that could support development within identified receiving areas

The purpose of this comparison is not to demonstrate compliance with a predetermined outcome, but rather to provide an objective assessment of the Town's ability to accommodate future housing growth.

The Town of Hardwick supports additional housing opportunities and has undertaken numerous housing-supportive actions, including zoning updates, housing-related bylaw amendments, village center planning efforts, infrastructure investments, flood recovery initiatives, and long-term resilience planning. The Town's capacity analysis should accurately reflect both these efforts and the unique challenges associated with flood recovery, buyout programs, floodplain management, and long-term community adaptation.

The Town looks forward to working collaboratively with NVDA to develop an analysis that is technically sound, transparent, and suitable for inclusion in the Municipal Plan. The Town also hopes the analysis will help inform future discussions regarding where housing growth can most effectively support both community needs and long-term resilience objectives.