

To: Chair Alison Clarkson,

Cc: Members of the Senate Economic Development, Housing and General Affairs Committee

From: Josh Hanford, Director of Intergovernmental Relations; Samantha Sheehan, Municipal Policy and Advocacy Specialist

Date: March 10, 2026

RE: S.328, Section 1: Planning for Housing Targets

Thank you for supporting and championing the interests of so many communities throughout Vermont. VLCT appreciates our partnership with you to help Vermont's cities and towns meet the obligations and functions of today's local government and take the action needed to solve the challenges of the 21st century.

The purpose of this memo is to provide final recommended changes to S.328 Section 1 that would enable all municipalities to comply with the new required elements of a municipal plan regardless of their professional planning capacity and resources.

VLCT Recommendations

1. **4388(1) Strike "and provide regulations that allow for" to read:** (1) The municipality shall identify and analyze existing and projected housing needs for the projected population of the jurisdiction and the rehabilitation, improvement, or development of the number of housing units needed, as identified in the land use plan and future land use map, including:

Reason: Municipal Plans are not regulatory documents.

2. **4388(1)(A) Strike "including location, age, condition, and occupancy required to accommodate existing and estimated population projections;"**

Reason: The current age, condition, and occupancy or existing housing units is not readily available data. Age and condition of structures would be reported on assessors card for the purpose of reappraisal or grand list maintenance but would not be current between reappraisal cycles. Municipalities are not currently required to record occupancy or vacancy and there are no clear current standards or definitions to follow.

3. **4388(1)(B) Strike all: (B) an inventory of sites, including zoned, unzoned, vacant, underutilized, and potential redevelopment sites, available to meet the jurisdiction's needed housing types;**

Reason: These metrics are more appropriate for a full housing needs assessment or feasibility study, which requires a far more expensive and intensive inventory, research, and analysis

beyond the scope of most citizen planning bodies capabilities and may not be useful or necessary to conduct municipality wide in most scenarios in order to support new, future local policy actions that enable new home construction.

4. **4388 (1)(D) Strike : “a detailed description of” to read : *what actions the jurisdiction may take to accommodate the projected needed housing types identified in subdivision (A) of this subdivision (1), including:***

Reason: Municipal Plans should, at a high level, guide ongoing planning, zoning, and bylaw adoption and revisions that advance the long-term planning vision and housing needs of the municipality. Detailed proposals or guidance for future changes to local land use regulation should be made by resolution of the municipal legislative body, not in the municipal plan, and adopted through normal planning processes. In the case of planning for infrastructure investment, that should appropriately be addressed in a separate Capital Plan which is a component of the Municipal Plan. This is not useful or appropriate material for the Housing Targets section of a Municipal Plan.