Town of Norwich Board of Civil Authority Tax Assessment Appeals

Tuesday, October 14, 2025 5:30pm

Elizabeth Wilson

Appellant Evidence Packet

Contents:

- 1. Appeal letter
- 2. Grievance Letter from 7/10/25

To: Town Clerk Norwich Town Offices Tracy Hall Norwich, VT 05055

From: Elizabeth Wilson
40 Norwich Meadows Drive, Unit #11
Norwich, VT 05055
elizabethjoanwilson@gmail.com

Date: 7 October 2025

Re: Appeal to the Board of Civil Authority – Norwich Meadows Condominium #11, Parcel ID 15-055.011

Dear Members of the Board of Civil Authority,

I respectfully request that the Board of Civil Authority hear my appeal of the 2025 property tax assessment for my home at 40 Norwich Meadows Drive, Unit #11. Having appealed to the Norwich Board of Listers, I now seek review under 32 V.S.A. § 4404.

Grounds for Appeal

The Board of Lister's adjustments created drastic inequities within identical properties the Norwich Meadows Condo Association. Identical or functionally identical units are now assessed at levels that differ by over \$170,000—an outcome that is procedurally problematic and unfair. These outcomes result in values which appear to be arbitrary, capricious, and contrary to the principle of uniformity. The procedural inequities introduced during the re-evaluation are the basis for this appeal.

Background: The 2025 reassessment increased my property's value far beyond both the townwide average and the average for similarly valued homes. The Town of Norwich's overall increase averaged 62%, while homes in my valuation bracket increased on average only 52% (see previous correspondence). Although the Board of Listers reduced my unit's valuation by \$61,400 after my grievance, its valuation remains 120% above its prior value, nearly double the town-wide average increase.

The Vermont Constitution's proportional contribution clause requires that "[t]axes shall be uniformly assessed on the lists of the persons taxed" (32 V.S.A. § 4601). Listers are further bound by oath to "list the same without discrimination on a proportionate basis" (32 V.S.A. § 3431). Vermont case law emphasizes that once fair market value is determined, it must be equalized so that comparable properties bear comparable tax burdens (*Kachadorian v. Town of Woodstock*, 149 Vt. 446 (1988)).

Evidence of Inequity

Figure 1 compares 2024 and 2025 assessments and Board of Lister Adjustments for six units in Norwich Meadows that are either identical or functionally identical:

- Point 1: Units 2, 3, 11, and 12 share the same floor plan (1,472 sq. ft., 1.5 baths). In 2024 the assessed values of these four units differed by only \$4,500. In 2025, without any structural changes, the initial grand list assessment differed by \$22,200. After the Board of Lister evaluation increases ranged from 37% to 131%, producing differences of over \$175,600 in valuation. Units 11 and 12 (slab construction, facing Highway 5) were historically valued at slightly less than Units 2 and 3 (with basements and not facing the highway). Unit 2 is now assessed at \$143,200 LESS than Unit 11 and Unit 3 is now assessed at \$31,400 MORE than Unit 11.
- Point 2: Units 6 and 7 are structurally identical in floor plan, but with basements, windows on three sides and only sharing one wall. In 2024, Unit 7 was assessed \$62,300 more than Unit 11. In 2025, despite no structural change, Unit 7 is now assessed \$88,500 less than Unit 11; a swing of more than \$168,500.

These disparities cannot be explained by condition, structure, or market evidence. They reflect unequal treatment of like properties, in violation of Vermont law. Additional figures are presented in Attachments 1 and 2 to show the data in other forms.

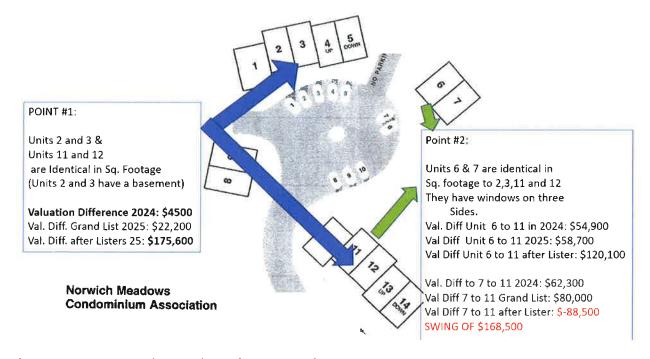


Figure 1: Supporting data with configuration of units at NWM.

Request for Relief

Because credible evidence has been presented that Unit #11 and other identical units are not equitably assessed, the presumption of validity in the grand list no longer applies (*New England Power Co. v. Town of Barnet*, 134 Vt. 498 (1976)). The burden now rests with the Town to justify the current assessments.

As a temporary remedy, I respectfully request that the Board adjust Unit #11's assessment to align with the town-wide average increase of 62%, pending a more consistent and equitable equalization of all Norwich Meadows units. This adjustment would mitigate the most severe inequity while ensuring proportional contribution.

Alternatively, if the Board determines that equity cannot be achieved through averaging, I request that my assessment be reverted to its 2024 listed value until such time as a constitutionally sound, uniform reassessment process can be completed. This remedy would avoid locking in arbitrary disparities across Norwich Meadows properties that undermine confidence in the fairness of municipal operations.

I ask that the Board of Civil Authority:

- 1. Review the attached evidence and hear my appeal.
- 2. Require that assessments for identical and functionally identical Norwich Meadows units be equalized consistent with Vermont law.
- 3. Adjust the assessment of Unit #11 in a manner that reflects both fair market value and proportional treatment relative to peers, whether by aligning with the town average or, if necessary, reverting to the prior value until fairness is ensured.

I also want to acknowledge the Board's responsibility to apply the law and to maintain a process that the public perceives as fair, consistent, and trustworthy. My appeal is brought in the spirit of strengthening confidence that municipal operations adhere to established standards, and to ensure that all taxpayers are treated with equity and integrity. I am grateful for the Board's careful reflection on this matter and for its role in safeguarding the integrity of our town's processes.

Thank you for your service in ensuring a fair and uniform tax system for the Town of Norwich. I look forward to presenting my evidence at the hearing.

Sincerely,

Elizabeth Wilson

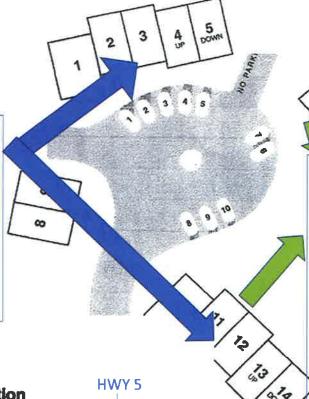
Owner, Norwich Meadows Unit #11

POINT #1:

Units 2 and 3 &
Units 11 and 12
are Identical in Sq. Footage
(Units 2 and 3 have a basement)

Valuation Difference 2024: \$4500 Val. Diff. Grand List 2025: \$22,200 Val. Diff. after Listers 25: \$175,600

> Norwich Meadows Condominium Association



Point #2:

Units 6 & 7 are identical in Sq. footage to 2,3,11 and 12. They have windows on 3 sides and basements.

Val. Diff Unit 6 to 11 in 2024: \$54,900 Val Diff Unit 6 to 11 GL 2025: \$58,700 Val Diff Unit 6 to 11 after Lister: **\$120,100**

Val. Diff to 7 to 11 2024: \$62,300 Val Diff 7 to 11 Grand List: \$80,000 Val Diff 7 to 11 after Lister: **\$-88,500**

SWING OF \$168,500

Attachment: Exhibit A – Norwich Meadows Assessment Disparities (Grouped Identical Units)

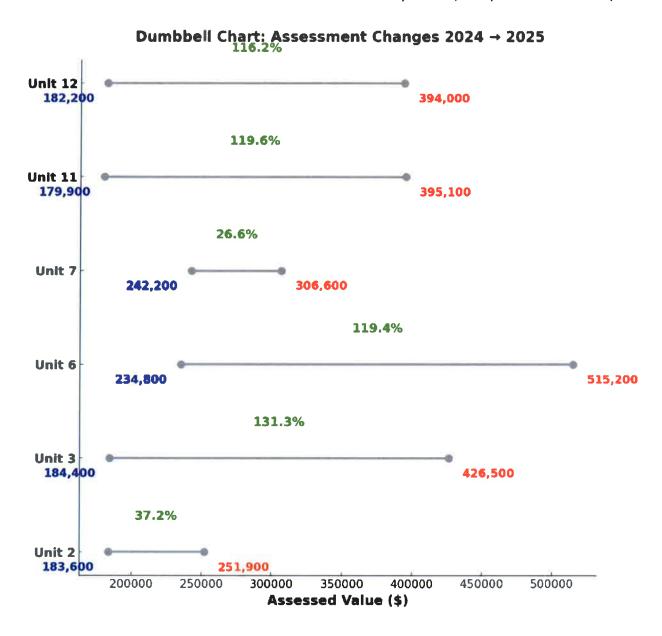


Figure 1: Assessed Values, Blue is the value in 2024, Red is the Value in the 2025 reassessment and Green is the percent change.

Side-by-Side Bar Chart: Assessments 2024 vs 2025

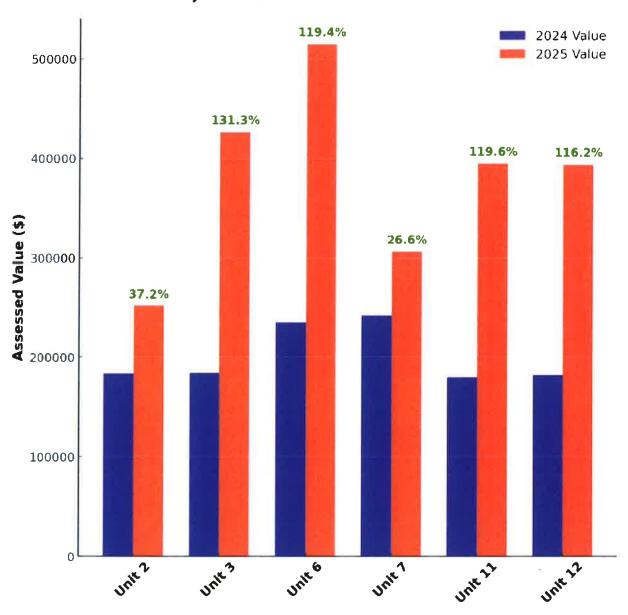


Figure 2: Assessed value changes. Note that before the assessment, Units 2, 3, 11 and 12 were less than \$4500 apart in assessed value. (Units 2 and 3 have basements). After the reassessment, the difference between functionally identical is over \$170,000. Before the assessment, Units 6 and 7 were similarly valued and valued at more than units 2,3,11 and 12. In the 2025 re-assessment, Unit 7 is now valued at \$88,500 less than Unit 11, a swing of \$168,500.

TOWN OF NORWICH - 2025 GRIEVANCE DOCUMENT

Property Owner: Elizabeth Wilson, Elizabeth Wilson Revocable Living Trust

Property Address: 40 Norwich Meadows Drive, Unit #11, Norwich, Vermont 05055

Parcel ID: 15-055.011

Contact: 651-357-6056 | elizabethjoanwilson@gmail.com

Date: July 10, 2025

To: Norwich Board of Listers Norwich Town Offices Tracy Hall, Norwich, Vermont 05055

Subject: Appeal for 2025 Property Tax Assessments – 40 Norwich Meadows #11, Parcel ID 15-055.011

Dear Members of the Board of Listers,

I respectfully submit this grievance to contest the 2025 reassessment of Norwich Meadows Unit #11 (Parcel ID 15-055.011), which rose by 154%—more than twice the average increase across Norwich (50–70%). This dramatic increase does not reflect fair market value and violates statutory principles of equity and uniformity. I am appealing on the following grounds:

- The reassessment overstates fair market value
- The assessment is **not equitable** compared to similar units and similarly valued properties

This grievance focuses on the dwelling assessment. According to the Vermont Department of Taxation's *A Handbook on Property Tax Assessment Appeals*¹ (by Charles Merriman, Esq. and Vermont Secretary of State Deb Markowitz, 2009), Vermont law (32 V.S.A. § 4601) requires: "Taxes shall be uniformly assessed on the lists of the persons taxed..."

The Handbook also affirms: "Once the fair market value of the property is established, it must be equalized to ensure that the subject property is being equitably assessed."

Unit 11's reassessment exceeds that of:

- Comparable units within Norwich Meadows
- Other Norwich properties recently sold
- Similarly valued homes in the 2024 Grand List

¹ https://morristownvt.civicpluswebopen.com/media/2706

1. Unit 11 Specifics

Unit 11 is a 1,472 sq. ft., two-story condo built in 1985, with the following features:

- 2 bedrooms, 1.5 bathrooms
- Open-plan living room and kitchen
- 10' x 10' wooden rear deck
- No basement (built on slab)
- Attic used for work/storage
- Shared walls on two sides, with neighbor noise
- No attached garage, carport access only
- Directly facing VT State Highway 5, with road noise

2. Fair Market Value Comparison: National Association of Realtors growth vs. actual increase

While the last reassessment occurred in 2016, national data from the National Association of Realtors (NAR) suggests an average annual appreciation of **5% per year**, which would reasonably justify a 50–60% increase. However, the assessment of unit 11 has increased by **2.54 times that**—despite no structural improvements or additions since the time of purchase. If the assessment had followed inflation, the increased assessed amount would be \$243,593, if it had followed the 5% average NAR, it would be \$279,000. I purchased Unit 11 in January 2019 for \$241,000. If instead, the Unit 11 2019 purchase price is used as a base, the NAR 5% year on year growth would lead to an assessed value of \$307, 583 or a 53% increase.

3. Inappropriate Use of Disparate Norwich Meadows Sales

During the 2022-2025 period three Norwich Meadows units have sold.

- 1. Unit #14 \$392,000, 2 bedrooms, two full bathrooms
- 2. Unit #1 (Sold twice, first for \$387500, then flipped for \$455,000, end unit, **two bedrooms, two bathrooms, full basement**
- 3. Unit #10 \$599,000, end unit, three bedrooms, three bathrooms

Units #1 and #10 are not comparable to Unit #11 which has

No basement

² National Association of Realtors, Understand Market Behavior Research and Statistics, June 2025, https://www.nar.realtor/research-and-statistics

- 1.5 bathrooms
- No third-side windows
- Structural issues (foundation crack)
- Less privacy, direct road noise and fewer upgrades

Yet, Unit 11 was assessed \$4,200 higher than its imputed average value.

From the 2025 Value, it appears that the adjustment was made by (+/-) by averaging these four sales (See Table 1).

	Unit	Sq. ft.	Sale Price	\$/Sq	ft.	2024 List	2025 List	
	#1	1408	387500	\$ 2	75.21	\$232,100		\$541,300
		1408	455000	\$ 32	23.15			
	#14	1334	392000	\$ 29	93.85	\$163,300		\$363,600
	#10	1778	599000	\$ 33	36.90	\$238,900		\$568,900
	AVERAGE			\$ 30	07.28			
Imputed								
Value	#11	1472	n/a	\$ 30	07.28	179,900		\$452,314

Table 1: Sales of other Norwich Meadows Units. From this the imputed property increase to Norwich Meadows #11 was calculated. NOTE: the Unit #11 2025 Value is \$4,200 higher than the calculated average at \$456,500.

4. Comparison to Identical Units: Unit #11 Compared to Norwich Meadow Units #2, #3 and #12:

Units #2, #3, #11, and #12 in Norwich Meadows are functionally identical, each with 1,472 sq. ft. and 1.5 baths. Notably, Units 2 and 3 have basements and they do not directly face the road, Unit #12 is a mirror image—yet all three units are assessed lower than Unit 11, which is built on a concrete slab (See Table 2). This inconsistency highlights the lack of equitable valuation.

Unit	Basement	2025 Assessment	Difference vs. Unit 11
#2	Yes	\$444,600	-\$11,900 (-3%)
#3	Yes	\$453,600	-\$2,900 (-1%)
#12	No	\$443,300	-\$13,200 (-3%)
#11	No	\$456,500	N/A

Table 2: Similar Unit Values Compared to Unit 11. Note: Two of these identical units have basements, yet they are assessed lower than Unit #11. Unit 12, which is identical, is assessed 3% less—highlighting inconsistencies.

5. Comparison to Town of Norwich Sales (2022–2024)

Properties sold in Norwich 2022-2025 between \$205,000—\$470,000 saw 2025 assessments increase 15–50%, not 154%. Many of these had more land and amenities. Table 3 shows all properties with sales prices from \$205,000 to \$470,000 sold in the Town of Norwich from 2022 to 2025 listed on Zillow.

Address of Sold Property	Sq ft.	Acreage	Sale Price (2022- 2024)	P	rice per Sq. ft	2024 Grand List Value	2025 Proposed Value	Percent Change
1528 US RT 5 N	1848	1	205000	\$	111	218000	256000	15%
373 Town Farm Road	1515	6.1	275000	\$	182	204000	407900	50%
1649 US RT 5N	1506	1.6	289000	\$	192	231100	274100	16%
366 Union Village Rd	1802	1.6	297500	\$	165	322500	652200	51%
27 Rigewood Hill	1740	10.1	306000	\$	176	254200	334700	24%
859 Tigertown	1568	39	360000	\$	230	235200	362800	35%
152 Hawk Pine	1956	1.1	375000	\$	192	360600	460400	22%
91 McKenna Road	1732	0.4	380000	\$	219	263100	526400	50%
74 Carpenter St	1162	0.4	380000	\$	327	300500	514500	42%
21 Jones Circle	1273	0.2	410000	\$	322	275300	484900	43%
571 New Boston	1194	2	410000	\$	343	217500	288500	25%
317 Hopson	1344	1.4	417000	\$	310	319500	374300	15%
27 Bullock Rd	1390	2	419000	\$	301	247000	416100	41%
207 Chapel Hill Rd	2250	1	420000	\$	187	272600	520000	48%
937 Union Village Rd	2658	4.4	450000	\$	169	315200	434200	27%
1737 Turnpike Rd	1320	2	451000	\$	342	224400	447100	50%
714 Upper Turnpike rd	1440	10.4	455000	\$	316	323900	498800	35%
49 Turnpike Rd	1565	0.4	470000	\$	300	307100	483200	36%
47 Bullock Rd	3136	12	470000	\$	150	316600	651900	51%

Table 3: Zillow Sold Properties in the Town of Norwich 2022-2025. NOTE: All of the 2024 Grand List Values were substantially HIGHER than the \$179,900 Value for #11 Norwich Meadows.

6. Comparison to Similarly Valued Properties in 2024 Grand List

However, as all of the other sold properties listed here had a substantially higher 2024 Grand List Value than #11 Norwich Meadows, the next analysis examines these similarly valued properties. In reviewing 37 other Norwich properties with 2024 Grand List values between \$140,000 and \$250,000—a range encompassing the \$179,900 2024 Grand List Value—the average 2025 assessments increased by an average of just **52%**. By contrast, **unit 11 was**

³ As I had no access to property improvement data, outlier increases of more than one standard deviation from the mean were excluded from data analysis.

assessed with an increase of 154%, highlighting a stark and unjustified discrepancy in how similarly valued properties were treated. Since then there have been few sales and market conditions have changed substantially: interest rates have risen, affordability decreased, and times are different. Yet the reassessments appear to lock in those high-water mark sales prices from an anomalous period—ignoring the current market correction.

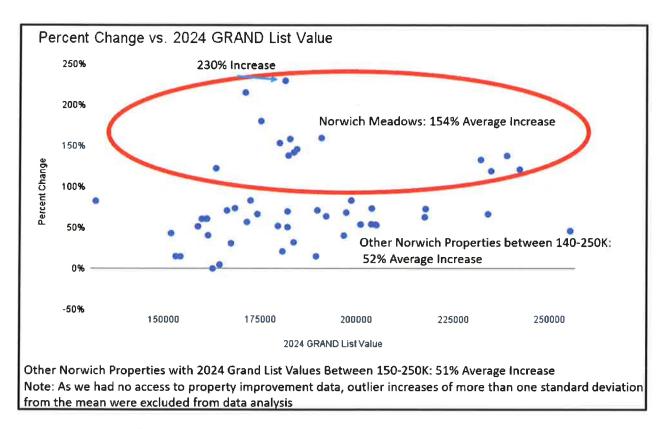


Figure 1: Percent change v. 2024 Grand List Value. Norwich Meadows average is almost three times the average Norwich increase. Unit #11 value increased 154%.

In summary: Unit #11 is *over assessed* compared to a) similar units within the Norwich Meadows development; b) its increase in valuation is proportionally much higher than any other recent sales within the Town of Norwich; and much higher than c) similarly valued 2024 homes within the Town of Norwich. Per 32 V.S.A. § 4601, taxes must be uniformly assessed. Norwich Meadows Unit #11 property's valuation—substantially higher than those of identical or superior units—undermines this statutory obligation.

7. Absence of Appropriate Norwich Comparables

There are no comparably priced multi-family condo or townhome properties within the Town of Norwich aside from our own development. Zillow and Realtor.com list no recent sales of similar housing types in Norwich. As such, benchmarking Unit 11 against a few peak-period, heavily upgraded units within Norwich Meadows skews valuation and fails to meet equity standards.

Moreover, it appears that multi-family developments like ours have been overvalued due to structural and locational differences that should have warranted downward adjustments rather than systemic penalization.

8. Hartford Regional Comparables

While Norwich lacks internal comparables, similar multi-family condo developments exist in nearby Hartford along Route 5. These units share similar size, age, and layout characteristics, but are selling at significantly lower prices per square foot than Unit 11's assessed rate.

#	Address	Year Built	Sale Price	Beds/Baths	Sq. Ft.	Price/Sq. Ft.	Sale Date	Zillow Link
1	36 Juniper Drive #6H, Hartford, VT	1989	\$322,500	2 beds / 2 baths	1,225	\$263.27	May 2025	<u>Link</u>
2	64 Azalea Circle #15, Hartford, VT	1994	\$350,000	2 beds / 2 baths	1,013	\$345.54	Apr 2024	Link
3	189 Woodhaven Drive #3J, Hartford, VT	1985	\$305,000	2 beds / 2 baths	1,048	\$291.43	Jan 2025	<u>Link</u>
4	40 Heather Drive #1E, Hartford, VT	1989	\$340,000	2 beds / 2 baths	1,225	\$277.55	July 2024	Link
5	55 Heather Drive #7C, Hartford, VT	1989	\$315,000	2 beds / 2 baths	1,225	\$257.14	Sept 2023	<u>Link</u>
6	99 Heather Drive #8G, Hartford, VT	1989	\$309,000	2 beds / 2 baths	1,243	\$248.40	May 2023	<u>Link</u>

Table 4: Hartford Comparables to 11 Norwich Meadows. The properties on this list benefit from city water and sewer. Additionally, properties 1, 2, 4, 5 and 6 have a city road, and shared swimming pool and tennis courts.

9. Site-Specific Factors That Reduce Property Value of Norwich Meadows #11

There are several tangible, value-reducing factors that were not sufficiently accounted for in Norwich Meadows #11 assessments:

- Norwich Meadows #11 directly faces Vermont State Highway 5, a noisy high-traffic corridor that lacks a sidewalk, making the area less safe and desirable for families, seniors, and pedestrians. Road noise can be heard from the inside of the unit.
- Norwich Meadows does not have access to municipal water or sewer services. Instead, our condo association manages its own shared well, septic system, and private access road, including ongoing snow removal and maintenance costs. Maintaining this aging infrastructure results in higher-than-average homeowner fees, compared to other multifamily developments.
- The burden of infrastructure management falls entirely on the association and its residents, unlike homeowners elsewhere in town who benefit from town-managed utilities and roads.

All of these factors raise Norwich Meadows monthly dues (currently \$625 per month) and lower the units' market appeal and should correspondingly reduce their assessed value.

As mentioned, Unit 11 is built on a slab and has no basement. Unfortunately, it also has a large foundation crack running through the unit from settling which cannot be easily repaired.

- Unit 11 is a two-story unit with windows on two sides only.
- Poor sound insulation means that neighbors can easily be heard.

These factors affect the value and resale potential of the unit.

10. Conclusion & Legal Basis

Given the evidence above, I respectfully request that the Board of Listers:

- Reevaluate Unit 11's assessment in light of comparable market values and physical condition
- Adjust for lack of municipal services and site-based burdens
- Avoid overreliance on atypical, peak-period internal sales
- Consider regional comparables from Hartford to establish fairer benchmarks

The 154% increase for a unit without upgrades or enhancements violates the principle of equitable taxation and overstates market value. Per 32 V.S.A. § 4601, taxes must be uniformly assessed. My property's valuation—substantially higher than those of identical or superior units—undermines this statutory obligation. I urge the Board of Listers to apply principles of fairness, proportionality, and realism—as outlined in state law and guidance—in reassessing this property.

I welcome the opportunity to provide further documentation or meet in person.

Thank you for your consideration.

Sincerely,

Elizabeth Wilson

Owner, Unit #11, Norwich Meadows

Norwich Condominium Unit #11

elizabethjoanwilson@gmail.com

Appendix 1: Valuation of Norwich Meadows Properties Units 1-14

Unit	2024 Grand List Value	2025 Proposed Grand List Value	Increase Amount	Percent Increase (Increase/2 024 Value) *100	Multiple
1	\$232,100	\$541,300	\$309,200	133%	2.33
2	\$183,600	\$444,600	\$261,000	142%	2.42
3	\$184,400	\$453,600	\$269,200	146%	2.42
4	\$170,900	\$539,300	\$368,400	216%	3.16
5	\$182,600	\$472,400	\$289,800	159%	2.59
6	\$234,800	\$515,200	\$280,400	119%	2.19
7	\$242,200	\$536,500	\$294,300	122%	2.13
8	\$175,000	\$491,100	\$316,100	181%	2.22
9					
10	\$190,800	\$496,000	\$305,200	160%	2.6
	\$238,900	\$568,900	\$330,000	138%	2.38
11	\$179,900	\$456,500	\$276,600	154%	2.54
12	\$182,200	\$434,300	\$252,100	138%	2.38
13	\$181,300	\$598,300	\$417,000	230%	3.3
14	\$163,300	\$363,600	\$200,300	102%	1.86
AVERAGE for All Norwich Meadows Properties	\$195,857	\$493,686	\$297,829	153%	2.52
CBI Increase	\$195,857	\$265,122	\$69,265	35%	1.35
5% Annual Real Estate Increase	\$195,857	\$300,088	\$104,231	53%	1.63