

**Sandra Vitzthum, Architect, L.L.C.**  
14 Loomis Street Montpelier, Vermont 05602 (802) 223-1806

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Susan Baird, District Coordinator  
District 5 Environmental Commission  
10 Baldwin Street  
Montpelier, VT 05633-3201

Dear Ms. Baird,

I am writing on behalf of the new owner of Goddard College's campus in Plainfield. Before any planning or design is done, we would like to assess permitting requirements for new house construction.

**Plainfield has applied for NDA designation from the Agency of Commerce and Community Development. Staff has recommended approval. The decision will come between July 10 and 21. I'm writing now to get into your queue, and will update you as soon as the decision is made.**

Goddard's tract or property is composed of two parcels, 117 acres in Plainfield and 13 acres in East Montpelier. (See the attached form for more details.) As you can see from the attached NDA map, the Plainfield parcel is entirely in the Village District and only part of it is in the proposed NDA due to a 200 ft rule for sewer service. The East Montpelier parcel is outside both the village district and the proposed NDA. Both parcels have public water and sewer, and both towns have permanent zoning and subdivision bylaws.

The property is subject to at least two previous Act 250 permits, 520040, 5W0042 (2012) and 500006 (1970). It's not clear to me if both parcels are subject to all three permits, or if there are any limitations; I have not been able to review the permits. There is one wastewater permit plus one general stormwater permit on file.

After a preliminary walk of the property, I have identified three promising spots for housing. These are shown as letters A, B, and C on the NDA Map 2 and also sketched on aerial images. We are not sure yet how many units would be proposed, but I assume something between 10 and 60 units. All three sites are easily serviced by water and sewer.

These are my jurisdiction questions:

- 1) Is either or both parcels disqualified from any housing exemptions because it is subject to an existing Act 250 permit?
- 2) Of the three identified sites - A, B, and C - two are just outside the proposed NDA and one is inside the proposed NDA. I believe A and B qualify by this criterion: *At least 51% of the parcel is within the ½ mile boundary of a Neighborhood Development Area, in an area with permanent zoning and subdivision bylaws served by public sewer or water services.* Would you agree all three identified sites qualify for priority housing?
- 3) Does the East Montpelier parcel get considered in this calculation? Its maximum distance from the proposed NDA is 0.21 mile (less than ½ mile). And if I have calculated incorrectly: *For those tracts with parcels beyond the 1/2 mile buffer area, at least 51% of the priority housing project parcel must be within the 1/2 mile buffer area.*

- 4) Does the qualification in #3 apply even if the housing development were to be located on the East Montpelier parcel, as long as 51% of the housing project is inside the ½ mile buffer area? Just north of site A is a very good place to build. I have colored it lime green and labeled it with red "Possible Site in E. Mplr."
- 5) And I correct to interpret the limit for housing units to be 75 because of Plainfield's NDA designation? And this is the total for new units; it would not count existing dormitories that get converted to apartments, correct?
- 6) Do I understand correctly that these new units can be lots for sale as long as the homes meet this criterion? *≥20% of housing units have annual ownership costs (principal, interest, taxes, insurance, and condominium association fees) that do not exceed 30% of the gross annual income of a household at 120% of affordable housing standard.*
- 7) Site C is located in an historic district; there are no existing buildings in that area so no modification or demolition of historic buildings. From reading the footnote on the Priority Housing flowchart, I assume being in an historic district does not disqualify that site as long as the proposed project complies with Plainfield's historic district zoning review. Is this correct?
- 8) I do not see the definition for "a discrete project." I assume the project I describe would meet this criterion, but am not sure. Can you help me?
- 9) Lastly, I hope I interpret "tract" correctly as the sum of contiguous parcels owned by one entity. Please let me know if I am incorrect because it is a condition for priority housing exemptions.

Thank you very much, Ms. Baird; we look forward to your opinion. **I will forward the NDA decision as soon as I get it.**

Sincerely yours,



Sandra Vitzthum  
Principal, Sandra Vitzthum Architect LLC

Cc: Mike Davidson, Ledgeworks (Owner)  
John Baker, Ledgeworks (Manager)