



August 15, 2025

Peter G. Gregory  
Executive Director  
Two Rivers-Ottauquechee Regional Commission  
128 King Farm Road, Woodstock, VT 05091

Dear Mr. Gregory

We are Board members of Homes for Norwich, a nonprofit based in Norwich, VT that seeks to increase the affordability of housing in Norwich through education and advocacy.

We are writing to encourage TRORC to consider Norwich's proximity to major job centers in designating areas as Village Areas or Planned Growth Areas (which collectively make up the state "Neighborhood" designation) under the Future Land Use Map for Norwich that TRORC is preparing for the Regional Plan. To help meet the state's housing and climate goals, it is important to locate housing close to where the jobs are. By designating the parts of Norwich that are not part of the Village Center but are within a close commuting distance of major job centers, as Village Areas or Planned Growth Areas, to the extent permitted by statute, TRORC will help to advance these important goals.

The following provides more detail about our request:

**Why consider proximity to jobs in designating areas as Village Areas and Planned Growth Areas?** Under Vermont's new land use designation system, areas designed as Centers (e.g., Downtowns and Village Centers) or Neighborhoods (areas surrounding Centers, including areas identified in the Regional Plan's Future Land Use maps as Village Areas and Planned Growth Areas) are expected to provide most of the housing needed to meet Vermont's demand. Among other things, these areas receive priority consideration for state affordable housing and infrastructure funding and consideration for Act 250 Tier 1A or Tier 1B categories, which facilitate new development.

In light of the desire for Centers and Neighborhoods to provide most of the housing that Vermont needs, it is important to ensure these designated places are matched up well with the main sources of demand for new housing, including and especially employment. In other words, we should put housing where the demand for housing is highest, which is close to employment centers. This will help minimize the number and length of necessary car trips, reducing vehicle miles traveled and helping the state achieve its ambitious climate goals, which include reducing greenhouse gas emissions to 26% below 2005 levels by 2025, with further reductions required

by 2030 (40% below 1990 levels) and 2050 (80% below 1990 levels) (Vermont's Global Warming Solutions Act (Act 153).

**How should proximity to jobs be considered in designating areas within Norwich as Village Areas and Planned Growth Areas?** As reflected in the Appendix to this letter, our research suggests that three census tracts in the Upper Valley are among the 13 tracts with the largest concentration of jobs in Vermont or close commuting distance to Vermont: one each in Lebanon, White River Junction, and Hanover. All three are close to Norwich. There are a number of different ways to consider Norwich's proximity to these three job-rich tracts as part of the Future Land Use mapping process. As a starting point for discussion, we propose that TRORC draw a circle with a radius of six miles around the centroid of the Lebanon tract (which has the greatest number of jobs and thus merits the largest commuting shed) and circles with a five-mile radius around the centroids of the White River and Hanover tracts.<sup>1</sup> The areas within these circles – i.e., the commute sheds for these job-rich census tracts – that fall within Norwich and are not already designated as Centers would then receive special consideration as either Village or Planned Growth Areas.

Under our proposed approach, areas within the circles that are not already a Center would be prioritized for consideration as either a Village or a Planned Growth Area. They would of course also need to meet the statutory requirements, notably for publicly available water or wastewater (or for Village areas, soils with good wastewater capacity). Adjustments could then be made – for example, to extend a Village area beyond the bounds of the circle where it makes sense to do so, or to omit parts of the circle that are in major forest blocks. To the extent that large portions of the Norwich area within these circles are conserved land or otherwise unsuitable for development, it would make sense to consider expanding the Village area beyond the circles to ensure there remains adequate space to accommodate the development Norwich and the broader region need to support working families and others.

We understand that TRORC is concerned about sprawl and we share that concern. That is why we are focused on the immediate commute shed around major job centers. Facilitating development in areas in close proximity to major job centers will relieve pressure on outlying areas, reducing rather than increasing sprawl. Another point to consider is the need to allow enough space within areas designed as Villages, Village Centers or Planned Growth Areas to account for the many different decisions that land owners will make and the diversity of parcel conditions. Not all owners will want to develop their land and not all parcels will be equally well suited to development. We need a balance between encouraging compact development and ensuring adequate space for development to keep rents and home prices in check. Our main point is that proximity to major job centers should be considered in drawing the maps that reflect this balance.

To be clear, we are not proposing that areas outside of the circles be excluded from consideration as Village or Planned Growth Areas. There may well be good reasons to

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<sup>1</sup> If desired, the process could be extended to draw smaller circles around the centroids of census tracts that have somewhat fewer jobs, meriting a smaller commuting radius to meet the demand.

designate such areas in locations that are further from major job centers. In this letter, we are focused mainly on what happens within the circles rather than on what happens outside of them.

### **How would this affect Norwich's section of the Regional Plan's Future Land Use Map?**

While we do not have capacity to do the formal mapping needed to identify the precise boundaries of these commute sheds, we suspect they would likely include all or most of the part of Norwich served by public water as well as some areas beyond the boundaries of the water system that might have good soils for wastewater and thus merit consideration as a Village area.

We expect that the parts of Norwich designed as a Village Center, Village, or a Planned Growth Area, would still represent only a small portion of Norwich's land area. The parts of Norwich that are further from employment centers are more rural and merit consideration for other designations, such as Hamlets and any of the several Rural designations.

We would be pleased to discuss this proposal with you at a mutually convenient time. Please let us know what dates work best for you.

Thank you for considering this proposal.

Sincerely,

Members of the Board of Directors of Homes for Norwich  
(listed alphabetically)

Susan Barrett, Vice President  
Linda Gray  
Barbara Landau  
Brian Loeb, Treasurer  
Karen Lubell, Secretary  
Jeffrey Lubell  
Marsha Price, President

Cc: Jaan Laaspere, Chair, Norwich Planning Commission  
Jeff Goodrich, Vice Chair, Norwich Planning Commission  
Steven True, Norwich Planning Director and Zoning Administrator

## Appendix

### Census tracts with the most jobs in Vermont or close commuting distance to Vermont

Jobs	Tract	County	City/Town/Village
12,449	9617.01	Grafton	Lebanon, NH
11,216	31.01	Chittenden	Williston, VT
9,842	10	Chittenden	Burlington, VT
8,399	9656	Windsor	White River Junction, VT
7,595	39	Chittenden	Burlington, VT
6,849	40.02	Chittenden	South Burlington, VT
6,494	9633	Rutland	Rutland, VT
5,967	9616.04	Grafton	Hanover, NH
5,735	9608	Addison	Middlebury, VT
5,690	22.01	Chittenden	Winooski, VT
5,276	9545	Washington	West Berlin, VT
5,120	33.04	Chittenden	South Burlington, VT
5,114	9685	Windham	Brattleboro, VT

Source: Data for all jobs in Vermont and Grafton County, NH by census tract, U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (2020). This list consists of the top ten Vermont tracts, plus two tracks in Grafton County that fall within this same range, plus a tract manually added from Windham County because it is very similar to the 10<sup>th</sup> highest Vermont tract.