



November 20, 2023

Mr. Craig Bolio  
Commissioner  
Vermont Department of Taxes  
133 State Street  
Montpelier, VT 05602

Dear Commissioner Bolio:

The Vermont League of Cities and Towns, the Vermont Assessors and Listers Association, and the Vermont Municipal Clerks' and Treasurers' Association are concerned that legislative efforts to reform Vermont's property tax valuation system will rush to the assumption that a statewide consolidation is the only solution to any property valuation shortcomings. While the Department implements Act 68 of 2023, we encourage you to better empower local officials with influence over the Department's legislatively-required recommendations, consider and recommend alternative solutions other than state consolidation in the report to the Legislature, and conduct a full cost-benefit analysis of any solutions compared to the existing system.

The maintenance of Vermont's grand list is a shared responsibility between municipal officials, private reappraisal firms, and the Vermont Department of Taxes. It is therefore distressing that the Legislature charged only the Department with the consideration of recommendations to improve the efficiency, consistency, and fairness of our property valuation system. We applaud the Department for including a meaningful effort to engage municipal officials in their workplan by conducting a "Field Research Strategy" in the scope of work of the recently issued "Research on Property Tax Administration Valuation Practices" request for proposals. And we appreciated Deputy Commissioner Sameroff's comments at a recent VLCT Board meeting that there will be several other meaningful opportunities for municipal officials to be heard. However, this listening should be followed by an empowering action that allows municipal stakeholders to help shape your recommendation to the Legislature. We request that you charge a committee of stakeholders -- to include listers, assessors, private reappraisal firms with experience in Vermont, municipal legislative body members, clerks and treasurers, state officials and others -- with forming the ultimate recommendation for improving our state's property valuation system.

Further, Act 68 directs the Department to provide only one solution to improving our state's property valuation system: the creation of "...a statewide system to conduct reappraisals...administered by the State...". We appreciated hearing from Deputy Commissioner Sameroff that the Department intends to broaden their analysis to include alternate solutions that increase efficiency, consistency, and fairness of

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the system, including recommendations that may maintain municipal involvement in the reappraisal system. We acknowledge that our current property valuation system has weaknesses, most notably a decreasing availability of people to do the work, heightened awareness of the detrimental impacts property valuation has on minority populations, and potential inequities in valuation from community to community. We'd welcome ideas, resources, and efforts to improve these weaknesses, and are interested in offering our own.

Act 68 calls for the Department to consider how much a centralized system would cost, and how to pay for it. However, it does not call for other solutions other than centralization, and therefore does not call for cost comparisons or a cost-benefit model comparing the current system to any proposed solution. Currently, municipalities and the state share the cost of maintaining the grand list. While the state provides a per-parcel fee that helps municipalities conduct reappraisals, regular maintenance of the grand list is increasingly absorbed by local budgets. Any recommendation to improve the current property valuation system should be accompanied by a cost-benefit analysis of the existing system, the new statewide proposal, and ideally, maintaining the municipally-led system with changes.

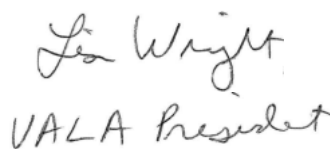
We also intend to work closely with the Legislature to amend the charge of Act 68 to include these requests. However, we hope you agree that making these changes could improve the likelihood of finding implementable solutions to the challenges facing our property valuation system.

Thank you for your consideration. Please feel free to contact us directly at [tbrady@vlct.org](mailto:tbrady@vlct.org), [wrightapprco@aol.com](mailto:wrightapprco@aol.com), or [holland1805@hotmail.com](mailto:holland1805@hotmail.com) with any questions or to discuss this issue in detail.

Sincerely,



Ted Brady  
Executive Director  
VLCT



VALA President

Lisa Wright  
President  
VALA



Diane Judd  
President  
VMCTA

Cc: Deputy Commissioner Rebecca Sameroff