

October 14, 2025

**City of Madison Planning Division** 215 Martin Luther King Jr. Blvd, Suite 017 Madison, WI 53703

Re: Comments on Proposed Development at 139 W. Wilson Street

Dear Members of the Planning Division:

While adding affordable housing downtown is a worthy goal, this proposal's approach—over **320 micro-units** on fifteen levels—raises serious livability and safety concerns. The density, lack of amenities, and minimal outdoor space risk repeating the failures of past high-rise public housing models. Madison deserves a higher-quality, more balanced solution.

# Major Issues:

- **Design:** Minimal façade relief, unresolved structural support for the "green element," and no contribution to the city's skyline or street character.
- Code Compliance: Missing secure vestibule, noncompliant stairs, no ADA units, inadequate fire separation, undersized electrical and mechanical spaces, and no emergency power system.
- Access & Parking: Only three compact stalls for 320 residents, no handicap parking, and excessive congestion for deliveries, egress, and bike access.
- **Livability:** Two elevators for all residents, long windowless corridors, undersized laundry and trash rooms, and no on-site management or security presence.

Given these deficiencies, I urge the City to deny approval of this project in its current form.

Sincerely,

T. Wall Enterprises Mgt, LLC

By: Terrence R. Wall, President

## **Opinions:**

1. There has been considerable time expended in developing what are incomplete planning documents for the concept at 139 W. Wilson. It appears the applicant is working to get a 'toe hold' in the City approval process in order to claim the start of some entitlement rights. At the same time after many months of efforts there remains the same major planning, design issues, and details that either do not meet codes or are left to be worked out at some unknown later time.

The goal of providing affordable housing is a laudable goal but the impression is placing 320 apartment units that are only a couple hundred square feet in size per unit on fifteen of the proposed sixteen levels is creating Madison's version of Chicago's Cabrini-Green development. This original high-density high-rise development, Cabrini-Green multi-family residence buildings have all been demolished after a short life attempting to serve as moderate income housing in Chicago. Due in part to the density, lack of amenities, and outdoor space the life of the Cabrini-Green development was characterized by ongoing social and crime driven issues. Do not allow this same scenario to occur in Madison. Madison developers and City staff can and should do better for its residents than allowing a high-rise people warehouse intended to squeeze out a return level on investment that exceeds the capabilities of the property.

The developer has taken the easy route to pack the most bodies in a building form that does not provide:

- A fraction of the parking needed for residents or building services
- A fraction of the needed activity/meeting/business space for over 320 residents
- Multiple challenging code issues left unresolved
- A design that does not add to the skyline or the urban fabric of the City in any manner

The City should acquire the property for much needed downtown park area and a smart access addition to the proposed development being planned for John Nolen Drive.

### **Exterior Design:**

- 1. An effort is made to add a minimal base and top at the West Wilson and John Nolen facades while offering no design relief to the large side facades.
- 2. It is assumed all units will require exterior mechanical grilles. The floor plans show no indication of any mechanical system.

- 3. The exterior materials do not offer relief in form or texture. Simply one material with one detail repeated.
- 4. If the front adhered 'green element' is illuminated then a lighting study is required. If this element is seen as an art installation separate City approvals are required.
- 5. Not clear how the overhang is supported at the 'green element'. Previous designs indicated a column element to provide support. Eleven stories of load extending over clear space is indicated at this time.
- 6. At four/five stories in height the 'green element' does not provide a sense of human scale at this urban street.

#### Code Issues:

- 1. No secure entry vestibule is provided. A vestibule is required per the energy code.
- 2. A five foot 'green' strip is shown along West Wilson. The City intends to widen this public sidewalk. Confirm City future requirements are being met.
- 3. Exit stair does not meet code requirements:
  - Exit door requires 'jumping' from a landing as it is in mid-level even though the building elevation shows it on the ground.
  - Size and clearances do not meet codes
- 4. Guest bike parking does not meet City standards.
- 5. Car parking may not be a requirement in this portion of Madison, but access by individuals with a physical impairment is. The development will require remote parking for people with a disability who will be required to travel along city streets.
- 6. The fire rating and distances from the existing adjacent Adria development will be an issue as the proposed building is five feet from the property line. Fire ratings need further study and code confirmation.
- 7. Generator or an extensive battery system is required by code. This is not indicated nor is space indicated to accept an emergency power system.
- 8. Electrical service room is undersized, doors do not swing in the direction of egress and if they did the doors then swing across circulation from the bike area.
- 9. Once mechanical units are added to the small apartments required clearances will be further reduced.
- 10. No units meeting ADA handicap requirements are currently shown.
- 11. No indication of roof or buried elements to control major rain events are indicated.

## Site development:

1. The nearest major city parking is at the Capitol Square South Parking Ramp approximately two blocks away. A minimum of three street crossing would be

- required to access the proposed development. Are handicap accessible stalls being guaranteed at this site for use by residents?
- 2. Three vehicle parking stalls for over 320 residents is not adequate. In addition, the three stalls are sized for compact cars and do not meet handicap parking requirements.
- 3. The mixing of the long travel path for emergency egress along John Nolen Drive, minimal site open area, parking for three vehicles, building services such as trash removal and deliveries, bike ingress/egress will be points of constant ongoing conflict. Too much in to small of a space!

### Livability:

- 1. The lack of a secure vestibule would allow anyone to follow a resident into the building when the single exterior doors are open.
- 2. Two elevators to provide services to 320 units will not function well. The recommendation is one for every 50/60 residences or about five for this development. It is also recommended not to exceed 150' to an elevator which the proposed design does not meet.
- 3. An approximately 200' long narrow corridor is the major circulation on each resident level with no relief, light, inset doors
- 4. Trash room size is inadequate for the number units wanted. The only method to remove waste is across a resident corridor through a water service room
- 5. No property management office or security is provided near the entry.
- 6. Parcel/mail area is undersized for the size of the development.
- 7. People at all economic levels own vehicles as a part of their life needs. Street parking is at a premium in this neighborhood, and is limited to relatively short periods of time. Public parking in a ramp is two blocks away and does not provide for the long-term parking that residents will require.
- 8. With approximately 21 units per floor laundry facilities are seen as not adequate at about two washers and two dryers per floor. How this space is vented out the side of the building is not indicated.
- 9. The addition of a common room overlooking Lake Monona provides no indication of size or intended amenities.