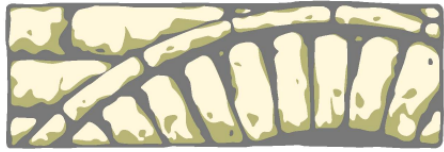


MADISON TRUST



for Historic Preservation

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August 13, 2010

City of Madison Economic Development Commission
Madison Municipal Building
350 S. Hamilton St.
Madison, WI 53703-3861

Ms. Yessa:

The Madison Trust for Historic Preservation and the National Trust for Historic Preservation submit the following comments on the city's development review process in response to the June 30 memorandum issued by Economic Development Director, Mr. Tim Cooley.

Owing to our constituency and expertise, our comments are focused on the review process as it relates to the Landmarks Commission and their review of projects that affect historic places.

Survey of historic places

The single most productive thing the city could do to improve the process for review of development proposals affecting historic places (landmarks or districts) is to conduct a broad survey of historic places in the city – one that includes areas developed through 1970. This would give everyone involved (developers, neighbors, interested residents) common information about which historic resources are most valued in Madison. A preemptive and comprehensive accounting of historic places using established criteria (either from the Landmarks Ordinance or from the National Register of Historic Places) would provide a predictable, common-ground starting point for negotiation of the approval process when it comes to historic places. Right now we are operating with a patchwork of small-scale surveys. One was done in the 1970s and focused on the downtown and the isthmus. The survey data is old and did not include places that were designed and built after World War II (the often used 50-year mark is now at 1960). Other surveys have been conducted in scattered areas of the city. The most recent was done internally in the mid-1990s and resulted in the Downtown Historic Preservation Plan. This plan is still valid, but is focused only on downtown and did not include areas of the city where the predominance of development took place after World War II.

The Landmarks Commission has begun the process of applying for a state grant to hire a professional consultant to conduct a broader survey outside of downtown. The city should support this effort wholeheartedly and, if needed, contribute to the project cost to allow as broad a geographical range to be surveyed as possible.

Amend the Landmarks Ordinance

Revise the Landmarks Ordinance to make it easier to interpret, in ways that do not diminish its effectiveness. For example, amend some of the language that fostered troublesome arguments in the Edgewater process. The Landmarks Commissioners have already undertaken a scrutiny of the ordinance in an effort to make changes that improve its clarity while maintaining its effectiveness. We support this work of the Commission and suggest the city does as well. The Commission is comprised of professionals who have worked more closely with the ordinance than anyone else and have the knowledge needed to make appropriate changes.

Our Landmarks Ordinance has strength to protect those places that are special enough to warrant official designation – places that contribute, more than any other to our city's unique sense of place. Our ordinance was crafted to protect the places in our city that convey a sense of Madison's history and culture in a way that no book or plaque can convey. It was crafted to protect those places against short-sighted decisions to mutilate or destroy culturally significant places based on short-term goals. We believe strongly that this ordinance is one of the best in the nation and caution against reactionary or ill-advised changes that would negatively affect protection of places that matter to Madison.

Validate or refute the city's reputation for difficult negotiations

The perception that development approval in Madison is difficult should be examined and changes made to increase the efficiency of all approval processes. However, it's important to remember that the Landmarks Commission had a 96% approval rate in 2009. The Commission reviewed 47 proposals for projects on HIST-designated parcels. Of those, 45 were approved or received a favorable advisory recommendation (the Edgewater proposal was counted among the 2 proposals that were denied). Figures like this paint a picture of development approval that is much more friendly than the reputation suggests. All land use review agencies should be required, if they are not already, to synthesize their deliberations and decisions monthly and annually. This data should be used by other city agencies to promote a clear picture of the city's record of approving proposals. The data should include easy-to-interpret facts and figures, such as

- number of proposals reviewed relative to the number approved and denied,
- number of agenda appearances before approval was secured,
- number of administrative approvals relative to number actually reviewed by commission,
- number of referrals prior to approval.

Enable Communication among review agencies

In consulting with Preservation Planners in other cities, communication arises as a critical, albeit subjective, element of an efficient review process. Anything that planning administrators can do to facilitate communication across review agencies would be beneficial. As an example, during the review process for the Edgewater proposal, the Landmarks and Urban Design Commissions held a joint meeting where the two commissions could discuss key questions in this process, like which of them should review the proposal first. Also, anything that can be done internally within the MMB offices of the Planning Dept. to facilitate open communication would be beneficial.

The Madison Trust for Historic Preservation and the National Trust for Historic Preservation applaud the work you are doing to improve the city's development process and we thank you for affording us an opportunity to present our views. If we can be of any further assistance, please do not hesitate to let us know.

Sincerely,



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The Madison Trust for Historic Preservation is a non-profit membership organization founded in 1974 with a mission of advocacy for and education about Madison's important historic and cultural resources in order to encourage and facilitate their long-term viability and continued contribution to our city's unique sense of place.

The National Trust for Historic Preservation is a non-profit membership organization bringing people together to protect, enhance and enjoy the places that matter to them. The National Trust for Historic Preservation helps revitalize neighborhoods and communities, spark economic development and promote environmental sustainability. With headquarters in Washington, DC, 9 regional and field offices, 29 historic sites, and partner organizations in all 50 states, the National Trust for Historic Preservation provides leadership, education, advocacy and resources nationally.