

**From:** [Becky Leidner](#)  
**To:** [Plan Commission Comments](#)  
**Subject:** Raemisch Farm development  
**Date:** Monday, August 29, 2022 10:04:39 AM

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Dear Parks Commissioners,

In February, the City Council voted 14-6 to place the zoning changes needed to greenlight the Raemisch Farm development project on file without prejudice, and voted 15-5 to also place a proposal for a land plat on file without prejudice. These zoning approvals are now on your Monday 8/29 meeting agenda. I urge you to reject them.

The Council's vote was taken due to concerns about the noise created by the F-35 jets due to arrive in early 2023, and about issues of public health and safety and environmental justice. None of these concerns are adequately addressed in the revised plan. The actual noise impact of the new jets won't be known until they arrive and start flying, but we already know that this area, including Lakeview Elementary School, will be in or close to the worst part of the projected sound map as measured by the Air Force. We should not allow ourselves to be seduced with promises of "sound mitigation," which even at best will do nothing to address the adverse health effects of excessive noise on people who are working or playing outside, trying to carry on a conversation with their neighbors over the back fence, or opening their windows on a warm summer day.

Pushing environmental preservation to the bottom of the priority list, as is typical with plans for development in Madison, the revised plan provides for 5.1 acres of park land or open space, a whopping 7.8% of the roughly 64-acre site. Long-standing natural habitats, already vanishingly rare within city limits, will be destroyed or fragmented to the point where they will no longer be part of viable ecosystems. Eighty-five percent of the current farmland acreage will also be lost, along with any possibilities for future urban agriculture. Most importantly, it's time for Madison to stop, deliberately and with your stamp of approval, locating low-cost housing in undesirable neighborhoods, in effect using economic coercion to force people to compromise their health and safety in order to be able to afford a place to live. We all know that wealthy white Madisonians will not be buying these homes. Please re-examine your priorities in light of your responsibility to make our city a safe, healthy, pleasant place for all its residents. This may involve belatedly realizing the economic harm, in the form of lost development opportunities, as well as the promised benefits, of bringing the F-35's to Truax.

Thank you,

Rebecca Leidner

**From:** [CD](#)  
**To:** [All Alders](#); [Plan Commission Comments](#)  
**Subject:** Vote No - Items 19&20  
**Date:** Monday, August 29, 2022 8:49:22 AM

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Dear Planning Commission members  
Please vote no on items 19&20 - hit pause on this until noise levels// true conditions can be ascertained!!!

This has already been decided by city council so Im not quite understanding why are we coming back to this same question yet again. The new plan does not address the concerns in any fashion. Im appalled that the interests of low- moderate income people (the targeted residents for this development) continue to be so blatantly disregarded in this city. The developer has been told already - wait til the impact becomes known. Risk is part of the game these folks have chosen - there are no guarantees re: return on investment.

Thank you  
Cathy Debevec  
East Main Street / Madison, WI

**From:** [Joan A Bell-Kaul](#)  
**To:** [All Alders](#); [Plan Commission Comments](#)  
**Subject:** Cart Before the Horse??  
**Date:** Sunday, August 28, 2022 11:46:18 AM

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Dear Alders:

A few months ago, it was decided that it would be premature to “set in stone” any actual plans (which I’m assuming would include zoning) for the future of the Raemisch Farm Acreage bordered by North Sherman Avenue and Packers’ Avenue—until such time as the F-35’s arrive here in Madison and do fly-overs, so that we can accurately determine whether or not the NOISE LEVELS produced by them over that area will be suitable for housing of any kind.

So we are puzzled as to why this zoning item has appeared on the meeting agenda NOW---we have NOT yet seen any announcements about the arrival of F-35’s or actual noise-level measurements over that property....

SO are we not “putting the cart ahead of the horse” here?

Joan Bell-Kaul  
Lead, Environmental/Nature/Wildlife Group-Nextdoor (now 750+ members and still growing)

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**Subject:**

# put the cart before the horse

— to do things in the wrong order, kick to front —



Many don't know about a putting the cart before the horse.

August 27, 2022

TO: Madison Plan Commission Members  
FR: Marsha Cannon, 5 Cherokee Cir. - #202, Madison, WI 53704  
RE: #72365 – Raemisch Farm Proposed Plat  
#72876 – Raemisch Farm Proposed Zoning  
August 29, 2022 Meeting

I am a member of the volunteer Raemisch Farm Work Group. I urge you not to recommend approval of the proposed plat and rezoning submitted by Green Street Development of St. Louis, Missouri. As you evaluate this third tweak to an intensive development plan for 63.5 acres of farmland, please consider the following comments.

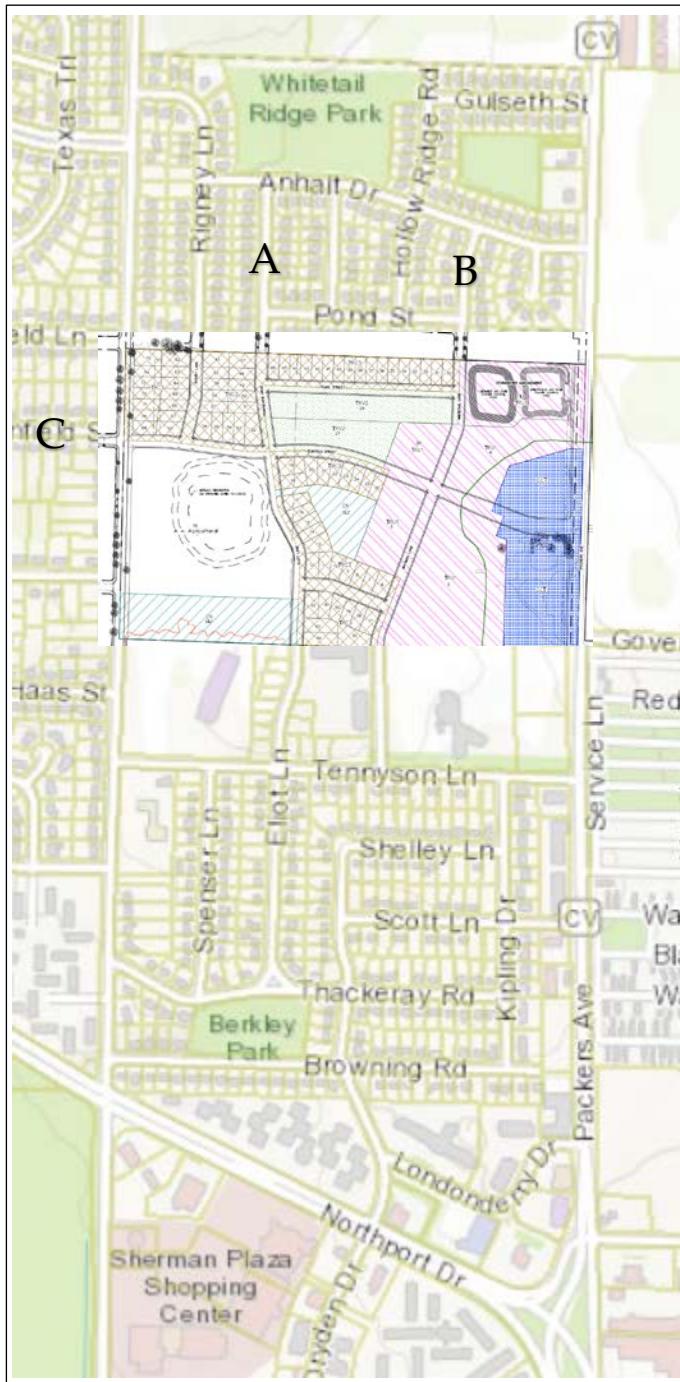
**Bike lanes should be incorporated into thru streets** anticipated to be bicycle routes that may have marked bicycle lanes. Please see map, Page 2. It illustrates three streets—all shown as 60 feet wide on the proposed plat—that likely would become preferred bike routes to Lake View Elementary School and the N. Sherman Ave. bike route, for students residing at Raemisch Farm and in Whitetail Ridge to the north.

One transportation strategy in the Comprehensive Plan is to “expand and improve the city's pedestrian and bicycle networks to enable safe and convenient active transportation.” This proposed development has the potential to create many new residences, particularly within the TR-U1 and CC-T properties at the eastern edge. However, none of the proposed street widths are wide enough to have a dedicated bike lane. MGO 16.23(8)(a) 8.vi sets minimum street widths for streets with marked bicycle lanes (ranging from 62-74 feet, depending on whether street parking is not allowed or allowed on one side or allowed on both sides). One or more streets should be widened to provide bike lanes that connect to the N. Sherman bike route and Lake View School.

**Two important notes on Sheet 1 of the June 27, 2022 proposed plat are not enforceable.**  
“**Note 2:** In CCT (Lots 1 & 3) no residential will be constructed before 1/1/2027.”  
“**Note 3:** Any residential built within the projected 65 decibel area will utilize HUD guidance on sound attenuation methods.”

In the August 29, 2022 Planning Staff Report, Recommendation 32, p. 13 reads: “Add text to note three clarifying that the restriction is in regard to noise generated by aircraft operating within the Dane County Regional Airport”

Both Note 2 and Note 3 should include text to clarify the purpose for these restrictions. The City has no control over the Raemisch Farm site. The applicant has said they would use measures to attenuate the airport noise. However, the City has no ability to enforce that promise. The applicant told the Council last February that they would prohibit any residential uses inside the 65 dB contour until at least 2027. But even with this revised plat proposal, and if the applicant still has no plans to have residences within the 65 dB contour, the City cannot enforce either Note 2 or Note 3.



<https://dcimapapps.countyofdane.com/dcmapviewer/>

**Bike lanes should be incorporated into thru streets.**

Three streets likely would become preferred bike routes to Lake View Elementary School and the N. Sherman Ave. bike route, for students residing at Raemisch Farm and in Whitetail Ridge to the north.

**Thru streets are labeled as follows:**

**North-South thru streets from Anhalt Drive to Tennyson Lane:**

- A - Prairievie Drive/Eliot Lane**
- B - Whitetail Lane/Whitman Lane**

**East-West thru street from N. Sherman Ave. to Packers C/V**

- C - Sunfield Street**

None of the proposed street widths are wide enough to have a dedicated bike lane. MGO 16.23(8)(a) 8.vi sets minimum street widths for streets with marked bicycle lanes, (ranging from 62-74 feet, depending on whether street parking is not allowed or allowed on one side or allowed on both sides).

**NOTE:** On the map, Lake View Elementary School appears as a diagonal rectangle where Tennyson Lane meets North Sherman Ave. to the west.

**Covenants and Restrictions are unclear.**

**"Note 9:** Lots will be "subject to covenants and restrictions."

- a. What restrictive covenants are anticipated? Will there be a homeowners' association?
- b. Will covenants be time-limited, renewable, or run with the land?

**Noise Compatibility: A study is underway—decibel contours are uncertain.**

Dane County is updating the Noise Compatibility Plan for Dane County Regional Airport, which will identify noncompatible land uses. The plan includes a Noise Exposure Map (NEM)—see map, Page 5, where Raemisch Farm appears near the center of the study area—and Noise Compatibility Program (NCP). The NEM is scheduled to be submitted to the Federal Aviation Administration for final approval in December, 2022. A document detailing the Noise Compatibility Planning Study process and scope can be found online at <https://www.msnairport.com/documents/pdf/MSN-20220426-Public-Mtg1-Boards-Final.pdf>

The Plan's documentation must address two time frames:

- (1) Data representing the year of submission, and
- (2) A forecast year that is at least five years following the year of submission.

Two factors are likely to require changes in the current decibel contour map that the developer refers to in Note 3, on plat Sheet 1:

- (1) Arrival of F-35 fighter jets in Spring 2023
- (2) Anticipated expansion of Dane County Regional Airport with more flights and larger planes being accommodated through airport improvements and expansion.

The eastern edge of Raemisch Farm (the CC-T zoned parcels and some of the TR-U1 zoned areas) are within the currently estimated 65 dB contour. With the new NEM being prepared, that contour line may expand or contract. The federal government has this to say about residences within the 65dB contour:

Where the community determines that residential or school uses must be allowed, measures to achieve outdoor to indoor Noise Level Reduction (NLR) of at least 25 dB and 30 dB should be incorporated into building codes and be considered in individual approvals. Normal residential construction can be expected to provide a NLR of 20 dB, thus, the reduction requirements are often stated as 5, 10 or 15 dB over standard construction and normally assume mechanical ventilation and closed windows year round. However, the use of NLR criteria will not eliminate outdoor noise problems.

[https://angf35eis.com/Resources/Documents/Draft\\_F35A\\_EIS\\_August\\_2019\\_Vol\\_1\\_Part\\_1.pdf](https://angf35eis.com/Resources/Documents/Draft_F35A_EIS_August_2019_Vol_1_Part_1.pdf)

Since we currently do not know what parcels may come within the 65 dB contour estimate, but will know within the next few months, perhaps it would make sense to have this additional information before determining appropriate land uses through rezoning.

## Raemisch Farm is not Bimbo Bakery

The applicant has resubmitted a proposed plat that does not differ from the plat submitted to the Common Council last February—except now the proposed agricultural land is identified and there are 21 fewer single-family lots.

The one situation that has changed since February is City approval of affordable housing development at the former Bimbo Bakery, 3401 E. Washington Ave., which is within the 65 dB contour. As listed in the table below, there are significant differences between the Raemisch Farm site and the Bimbo Bakery site. Regarding how to address airport noise, the City has some level of control over noise at the Bimbo site. As stated in the disposition letter for 3401 E Washington:

The developer is strongly encouraged to incorporate noise mitigation strategies during construction of the buildings. Note: This would likely be required as part of an agreement for financial support from the City of Madison, and such strategies would be reviewed prior to issuance of building permits and inspected at appropriate stages of construction by Building Inspection staff.

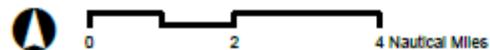
<https://madison.legistar.com/View.ashx?M=F&ID=11134959&GUID=3EBA26AA-D845-434F-BD00-04803B82E589>

The Bimbo Bakery project is different from Raemisch Farm		
<b>Site type</b>	Industrial site, abandoned in 2019 Redevelopment of blighted land.	Productive farmland. New development of rolling landscape.
<b>Developer</b>	WI Housing Preservation Corp., a (501)(c)(3) nonprofit located in Madison, WI	Green Street Development, part of Green Street Real Estate Ventures, a privately held corp., St. Louis, MO
<b>Site size</b>	6.4 acres	63.5 acres
<b>Transportation</b>	On Bus Rapid Transit line	Not on Bus Rapid Transit line
<b>Residential Component</b>	<b>245 subsidized apartments in 4 buildings</b>  77 apts in a 5-story bldg. 110 apts in a 5-story bldg. 46 apts in a 3-story bldg. 12 town-homes in a 2-story bldg.	<b>Between 600-1,300 housing units</b> , per Aug. 29, 2022 Planning Staff Report.  <b>Developer proposes “workforce” market-rate</b> housing in unspecified number of buildings of undetermined size and height.
<b>Density</b>	<b>Unspecified in staff report.</b>	<b>9.7 to 21.5 dwelling units/acre</b> (Whitetail Ridge = 3.1 units/acre)
<b>Financing</b>	WHEDA tax credits. Possible tax increment financing district.	No public financing requested; looking into forming tax increment financing district.
<b>Sound mitigation</b>	<b>Developer committed to sound mitigation \$5,000/unit.</b> City funding might be available.	<b>No sound mitigation required.</b> Note on proposed plat conveys goodwill but no way to enforce.



**Dane County Regional Airport**  
**M a d i s o n , W i s c o n s i n**

Figure:  
Project Study Area



*Draft Study Area Map*

## Noise Exposure Map

<https://www.msnairport.com/documents/pdf/MSN-20220426-Public-Mtg1-Boards-Final.pdf>

August 27, 2022

Project Address: 4000-4150 Packers Avenue and 4201 N. Sherman Avenue, Raemisch Farm

Agenda Items #19 and 20 , Legistar # 72876 and # 72365

Alder District: Alder Myadze, District 18

Prepared by: Beth Sluys, District 18

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**“The Oscar is loaded with a goldmine of amenities to enhance your unique lifestyle.”**

~The Oscar Apartments website, a Greenstreet Community



The above image is the “rustic playground” amenity that was provided to the residents of the apartment complex built by Greenstreet in Sheboygan, WI. This is the quality of effort put forward in creating home places and community spaces. I visited The Oscar apartment complex in June while in the Sheboygan area on vacation. I wanted to experience the development that has been mentioned at public meetings by Joel Oliver of Greenstreet. The buildings seemed to be mostly rented, but the grounds were mostly dirt and weed covered, the amenities lacking, as you can see by this image. I can only say that I found the place to be depressing and it did not seem like care was being given towards place making and creating a sense of Home. No real effort to complete the project.

As it clearly states in our Comprehensive Plan, “Feedback through the Imagine Madison process highlighted the importance of infill/redevelopment and compact edge growth to reduce the loss of farmland...and to reduce the rate at which farmland is developed” (Strategy 6, Land Use and Transportation). The Comprehensive Plan clearly states “peripheral growth should first occur in areas already served by utilities, followed by other areas already within the Central Urban Service Area (CUSA).” This project **does not** “steer peripheral growth towards priority areas with a focus on land already served by utilities.” **There are no utilities on this land.** This project does not “accommodate a majority of growth through infill and redevelopment.” **This plat continues to be about urban sprawl.**

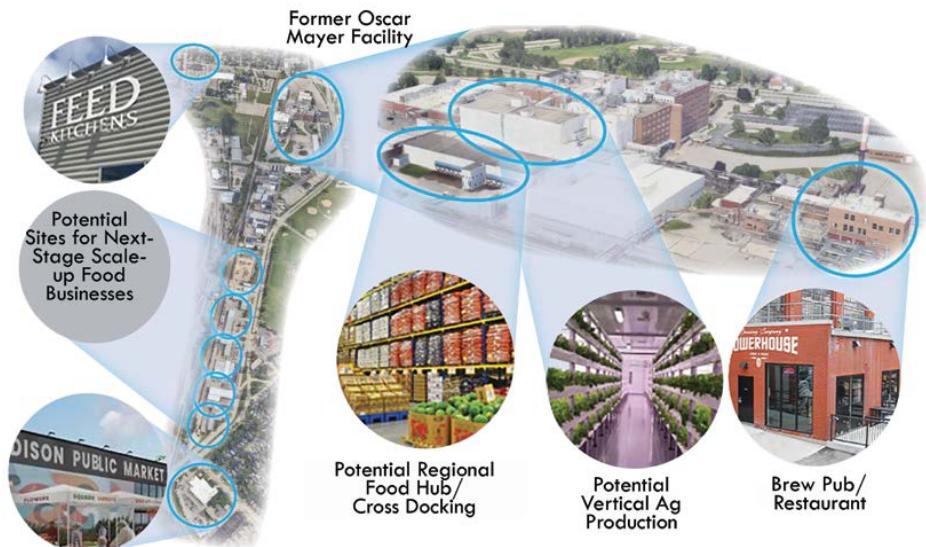
The post-industrial area immediately to the south along Commercial Avenue and the Oscar Mayer area is slated for significant redevelopment and infill. There is a major affordable housing development for 2,000 people being planned now. This area and the area along Packers Avenue to the south (previously the Hooper’s property) is now zoned with the highest density zoning

(RMX) that is allowable in Madison. No green space required, high density. Thousands of people. These areas are also within the proposed Transportation Oriented Development corridor. Residents living in this area will be provided with the best public transportation via the Northbound bus route that was determined during the Metro Redesign process, and being described by Metro as the future North Bus Rapid Transit route. These residents would likely love to have community garden plots that are accessible via bus located right up the road at the farm.

The Raemisch Farm could tie in as a local food source both for community gardens and for small-scale commercial farmers. Food growers that could support a local food hub and produce processing facility on the north side, perhaps host a farm stand supported by area youth engaged in a farming training programs. Keeping all 63 acres of land as farmland would make our urban farm one of the largest in the country and provide land access to our diverse community. Troy Gardens is a combination of community gardens and commercial gardens operated by Rooted WI, Inc. Rooted WI, Inc. conducted research to determine demand for land access in Madison and found that in 2019 there were land requests from 83 growers representing 122 acres of needed farmland. Tillable farmland is not the same as green / open space or wetlands. The 10 acres being presented again on the plat as being available for agriculture are, however, not all tillable acres. Current farmers leasing this land for agricultural uses understand this and do not use this area for crops because of the wetland.

Our Comprehensive Plan and neighborhood plans are the backbone of our current system of planning. While there is work underway for a district-focused planning process, our current system draws from these community-based planning tools. Thousands of people, and thousands of people hours have gone into this process. I ask that we honor the plans created in community, the future visions and the absolute necessity for planning for providing more local land access for a diverse group of food producers to provide food for our community. The Northside has a history of food innovation with our FEED Kitchen and many new young entrepreneurs opening restaurants and grocery stores. Food is the key.

There is language in the Comprehensive Plan and the subarea plan, the Oscar Mayer Special Area Plan, for a food innovation corridor as both a source of local food and an economic driver along Packers Avenue. Let's consider the public market on First Street, Raemisch Farm and Troy Gardens as the anchor points for a food innovation network that will include food growers, food preparation and food consumers. Is it really so hard to imagine this land providing local food and committing it to food production? It only makes sense in terms of our decisions made during the planning process and the desire for all local food growers to have access to farmland. It makes sense in light of climate change and the challenges we will be facing as water shortages in our country's food production areas are put under stress. We can grow a lot of food locally on 63 acres to feed ourselves.



Strategy #8 of the Neighborhoods and Housing section of Comprehensive Plan states that we need to “ensure access to food that is affordable, nutritious, and culturally specific.” The actions required include: 1) Continue initiatives to support the introduction of neighborhood-serving grocery stores into under-served established neighborhoods, 2) identify public and private spaces suitable for community gardens and explore expansion of existing gardens to meet demand, 3) Improve access to fresh foods by encouraging and facilitating the equitable distribution of farmers markets and farm stands and 4) Encourage initiatives that support the emergency food system and facilitate donation of near-expired, but high quality, foods.

Strategy #7 of the Economy and Opportunity section of the Comprehensive Plan states “Support efforts for businesses and consumers to produce and buy local food, products and services. How? Three actions are listed: 1) Foster a Northside Food Innovation District, 2) Continue implementation of the Madison Public Market and MarketReady Program and 3) Expand the street vending program. Let’s do this!

Strategy #5 in the Effective Government section of the Comprehensive Plan expects that we will “ensure that new development occurs in locations that can be efficiently served to minimize costs on the community as a whole” by “being judicious with outward expansion of utilities and community facilities.”

If we are not intentional about dedicating this land to for feeding our community, we will lose it forever. According to the 2018 Comprehensive Plan, between 2005 and 2017, “the number of acres used for agriculture or sitting vacant has declined by 1,700 acres, meaning a large amount of land already within Madison city limits is being converted to other uses primarily residential, commercial and parks and open space.” We are losing urban farmland within our city limits but have the opportunity to conserve these 63 acres of active urban farmland today.

Through the Urban Footprint process, a key part of the Comprehensive Planning process, the community’s preference was for “growth to be largely infill and redevelopment.” This means focus on the missing middle housing and redeveloping already disturbed or previously developed lands. **Our Comprehensive Plan states that “redevelopment projects frequently have access to existing transit service, the road and utility networks have already been constructed, no additional roads need to be maintained to serve redevelopment, the area is already covered by emergency services, and property tax values are substantially higher for most redevelopment projects, among other factors. All this adds up to redevelopment generating more tax revenue for the City while creating fewer costs to be borne by property taxpayers. Not only is that better in the short term, but redevelopment also helps sustain the fiscal health of the City over the long term – fewer maintenance liabilities are generated, and the City doesn’t have to depend as much upon revenues from new growth to pay for maintaining existing services and infrastructure.”**

Our Comprehensive Plan and the OMSAP are grounded in the reality that community members have committed to protecting urban farmland, we can create a food innovation network for the Northside and provide local land access for our diverse community, and housing is better on lands that require *redevelopment* rather than breaking new ground. The proposed dense housing proposed for redevelopment in a post industrial area will provide thousands of units of housing for families that will look for places to spend time outdoors as well as places to grow their own food.

There are new Northside restaurants, small ethnic grocery stores, the Public Market, MarketReady businesses, The River Food pantry and area churches that offer food pantries, area food carts vendors, a planned coffee cart at the Tiny House village, and our Farmers’ Market. Some of these businesses have expressed interest in locally grown food and commercial spaces for meat processing and sales, a tortilla manufacturing facility, and a produce cleaning and preparation facility. Once the commitment is made to creating the food innovation network, we will get to work to make it a reality!

We have done an amazing job with all manner of planning, we have heard that food growing and land access, particularly for our BIPOC community is a demand that is not being met, and we have a great opportunity to let the recently proposed Farmland Preservation Taskforce determine the best uses for this last piece of Northside urban farmland.

Growing food creates an emotional bond between people and the land. Helping people to get rooted to place. It is this very connection that is described in the Knight Foundation’s “Soul of the Community” report from 2010. The report stated that “people consistently give higher ratings for elements that relate directly to their daily quality of life: an area’s physical beauty, opportunities for socializing, and a community’s openness to all people. Remarkably, the study also showed that the communities with the highest levels of attachment had the highest rates of gross domestic product growth. Discoveries like these open numerous possibilities for leaders from all sectors to inform their decisions and policies with concrete data about what generates community and economic benefits.”

We as a community speak to sustainable development. The Sustainable Madison Committee has the following goals in their plan: 1) Develop a mechanism for creating community gardens, 2) Prioritize infill development to maximize use of existing infrastructure and facilities, 3) Encourage in-town agricultural opportunities that are appropriate in a well-populated urban area, 4) Support existing Community Gardens and find places to establish new ones, 5) Increase by 200% the public and private land set aside for local food production, 6) Support efforts to develop distribution and processing centers for local food. By keeping this farm in food, we can actively work towards meeting these goals.

In the recent issue of the Willy Street Co-op newsletter, and article entitled, "State of the Food Economy" states the following: "As domestic and global food chains have broken down, consumers are looking to more resilient local food networks from which to procure safe, quality food." We are at a moment in our history where conserving this land for farming could be a source of food resiliency on a real scale that can impact local land and food access, immediate emergency food supplies and easy distribution for our city.

### **Public Health and Safety**

As we have heard from Representative Mark Pocan's office, the F35 jets are slated to arrive in April 2023. In past meetings, the developer has shared that the buildings located within the preliminary 65dB area on the East side of the parcel would be commercial property, a proposed outdoor venue for people and dogs is being considered. To the west of this imaginary line of sound demarcation, multi unit apartments and single family homes are being proposed for an area that will likely see sound levels of over 110 dB. **The public health and safety issue has not gone away.** While the Council approved building within a 65 dB zone located directly in the flight path of the airport at the Bimbo Bakery site, it also created a tax incentive district and then committed over a million dollars towards sound mitigation. A real gift to the developer to help keep their costs down. We do not yet know the impact of the jet noise on our city but have a clear understanding of the lives of people in VT that are living under and near the airport in South Burlington and Winooski. Life is horrid. Please spend 12 minutes and watch the film Jetline – Voicemails from the Flight Path ([jetlinefilm.com](http://jetlinefilm.com)).

There is a large mobile home park along CV that needs to be considered. No Federal funds will be spent on mitigating those homes as they are not considered permanent structures. **Will the city contribute over a million dollars to those low income and working poor homeowners to mitigate their homes for sound?**

In the past, Greenstreet has claimed that they will build to HUD recommendations for sound mitigation. In the center of the proposed plat, we see a large green circular area with proposed central green space zoned CN. The building lots encircle the green space and are facing the airport. In reviewing the HUD Noise Guidebook, the multi-family building locations as proposed are exactly what should **not** be done. The layout as presented will only capture, bounce and amplify the already extreme noise levels. Should this plat be approved, please address the issue of building direction as to not add to an already unlivable situation for all residential units of housing on this plat. Please review the attached noise guidance document provided by HUD. Based on the commitment by the developer to not build residential within the 65dB but rather immediately adjacent to the imaginary line of demarcation for the intense sound, we need to consider building placement and sound abatement for all residential housing, most importantly the high rise, multi unit buildings. If built as lots are shown on the recent plat, they will not be built according to HUD guidelines.

As part of the sound study currently being conducted at our county airport as it relates to noise from aircraft, Federal Aviation Regulations Part 150 noise compatibility program indicates that agriculture and forestry are allowed land uses in areas that are 65dB or louder. Residential is not allowed at levels above 80dB and mobile home parks at any level of noise above 65dB are not allowed. Schools, churches and nursing homes are not allowed at 75dB DNL or above and no commercial uses are allowed at 80dB or greater. (see tables included below). Until we know for sure what our noise levels will be, we are making promises now that may cause undue harm to our neighbors in years to come. Why not wait and get the data we need to make clear and public safety focused decisions. Chances are good that none of the land shown as below the 65dB level will actually be at that level in real time measurements. People who live in the area near the airport already report 110dB noise levels.

The Federal Aviation Regulations Part 150 study for our community is underway. We as a community need to understand what the intense sound levels are going to be in this area. While the 65dB line has been established, it does not represent data that is grounded in reality, but rather a calculated model. It is a line on paper. Even the Wisconsin Department of Transportation describes the contour maps in this way: "Noise levels are then indicated by a series of contour lines superimposed on a map of the airport and its environs. Although lines on a map tend to be viewed as definitive, it is only a planning tool."

The 2011 WisDoT Airport Land Use Guidebook states the following:

*Aircraft noise has implications on airport neighbors. A number of studies have attempted to capture the effects of aircraft noise and some of the primary effects of aircraft noise include:*

**Speech interference:** Aircraft flying overhead can produce prolonged loud noises that can overwhelm normal voice levels and make conversations difficult.

**Difficulty learning:** Aviation noise can affect learning abilities, including reading, speech, memory, and motivation. Speech interference is likely the cause for learning difficulties.

**Sleep interference:** Aircraft noise could cause people to shift to a lighter stage of sleep or awaken and therefore interfere with the sleep patterns of some people. It is important to note that sleep interference varies from person to person based on a number of factors.

**Health Effects:** Some studies suggest that chronic exposure to high levels of noise can have adverse effects on one's health, including hearing loss. However, research is largely inconclusive at this time.

**House vibrations:** Evidence suggests that aircraft can create house vibrations for residences near airports.

We see these impacts and more in South Burlington and Winooski in Vermont where the F35s have been wreaking havoc in peoples' lives since 2019. Life near and under the flight path of the F35s is miserable and unsafe. The results of sound measures in real time in Vermont have shown that the boundaries of the 65dB line were much wider than originally modeled. In April 2023, when the F35s roar into our city, we can stand out on the land and measure sound from the F35s (and the F16s, as they will both be flying). Then we will know what levels are where, and can then plan to best protect our neighbors. We need not speculate. We will have the information we need in a short amount of time.

**Vote to keep the land at the Raemisch Farm in Agriculture for community land access for food production.**

We can do better.

Thank you for your service to our community.

**F.A.R. PART 150 LAND USE COMPATIBILITY GUIDELINES**

LAND USE	Yearly Day-Night Average Sound Level (DNL) in Decibels					
	Below 65	65-70	70-75	75-80	80-85	Over 85
<b>RESIDENTIAL</b>						
Residential, other than mobile homes and transient lodgings	Y	N <sup>1</sup>	N <sup>1</sup>	N	N	N
Mobile home parks	Y	N	N	N	N	N
Transient lodgings	Y	N <sup>1</sup>	N <sup>1</sup>	N <sup>1</sup>	N	N
<b>PUBLIC USE</b>						
Schools	Y	N <sup>1</sup>	N <sup>1</sup>	N	N	N
Hospitals and nursing homes	Y	25	30	N	N	N
Churches, auditoriums, and concert halls	Y	25	30	N	N	N
Government services	Y	Y	25	30	N	N
Transportation	Y	Y	Y <sup>2</sup>	Y <sup>3</sup>	Y <sup>4</sup>	Y <sup>4</sup>
Parking	Y	Y	Y <sup>2</sup>	Y <sup>3</sup>	Y <sup>4</sup>	N
<b>COMMERCIAL USE</b>						
Offices, business and professional	Y	Y	25	30	N	N
Wholesale and retail-building materials, hardware and farm equipment	Y	Y	Y <sup>2</sup>	Y <sup>3</sup>	Y <sup>4</sup>	N
Retail trade-general	Y	Y	25	30	N	N
Utilities	Y	Y	Y <sup>2</sup>	Y <sup>3</sup>	Y <sup>4</sup>	N
Communication	Y	Y	25	30	N	N
<b>MANUFACTURING AND PRODUCTION</b>						
Manufacturing, general	Y	Y	Y <sup>2</sup>	Y <sup>3</sup>	Y <sup>4</sup>	N
Photographic and optical	Y	Y	25	30	N	N
Agriculture (except livestock) and forestry	Y	Y <sup>6</sup>	Y <sup>7</sup>	Y <sup>8</sup>	Y <sup>8</sup>	Y <sup>8</sup>
Livestock farming and breeding	Y	Y <sup>6</sup>	Y <sup>7</sup>	N	N	N
Mining and fishing, resource production and extraction	Y	Y	Y	Y	Y	Y
<b>RECREATIONAL</b>						
Outdoor sports arenas and spectator sports	Y	Y <sup>5</sup>	Y <sup>5</sup>	N	N	N
Outdoor music shells, amphitheaters	Y	N	N	N	N	N
Nature exhibits and zoos	Y	Y	N	N	N	N
Amusements, parks, resorts, and camps	Y	Y	Y	N	N	N
Golf courses, riding stables, and water recreation	Y	Y	25	30	N	N

See next page for symbol Key.

## F.A.R. PART 150 LAND USE COMPATIBILITY GUIDELINES

### KEY

Y (Yes)	Land Use and related structures compatible without restrictions.
N (No)	Land Use and related structures are not compatible and should be prohibited.
NLR	Noise Level Reduction (outdoor-to-indoor) to be achieved through incorporation of noise attenuation into the design and construction of the structure.
25, 30, 35	Land Use and related structures generally compatible; measures to achieve NLR of 25, 30, or 35 dB must be incorporated into design and construction of structure.

### NOTES

- 1 Where the community determines that residential or school uses must be allowed, measures to achieve outdoor-to-indoor Noise Level Reduction (NLR) of at least 25 dB and 30 dB, respectively, should be incorporated into building codes and be considered in individual approvals. Normal residential construction can be expected to provide a NLR of 20 dB; thus, the reduction requirements are often stated as 5, 10, or 15 dB over standard construction and normally assume mechanical ventilation and closed windows year round. However, the use of NLR criteria will not eliminate outdoor noise problems.
- 2 Measures to achieve NLR of 25 dB must be incorporated into the design and construction of portions of these buildings where the public is received, office areas, noise-sensitive areas, or where the normal noise level is low.
- 3 Measures to achieve NLR of 30 dB must be incorporated into the design and construction of portions of these buildings where the public is received, office areas, noise-sensitive areas, or where the normal noise level is low.
- 4 Measures to achieve NLR of 35 dB must be incorporated into the design and construction of portions of these buildings where the public is received, office areas, noise-sensitive areas, or where the normal noise level is low.
- 5 Land use compatible provided special sound reinforcement systems are installed.
- 6 Residential buildings require a NLR of 25.
- 7 Residential buildings require a NLR of 30.
- 8 Residential buildings not permitted.

Source: *F.A.R. Part 150*,  
Appendix A, Table 1.

**LAND USE COMPATIBILITY WITH YEARLY DAY-NIGHT AVERAGE SOUND LEVEL AT A SITE FOR BUILDINGS AS COMMONLY CONSTRUCTED**

LAND USE	Yearly Day-Night Average Sound Level (DNL) in Decibels			
	50-60	60-70	70-80	80-90
Residential - Single Family, Extensive Outdoor Use	Compatible	with Insulation	Incompatible	Incompatible
Residential - Multiple Family, Moderate Outdoor Use	Compatible	with Insulation	Incompatible	Incompatible
Residential - Multi-Story, Limited Outdoor Use	Compatible	with Insulation	M marginally Compatible	Incompatible
Transient Lodging	Compatible	with Insulation	M marginally Compatible	Incompatible
School Classrooms, Libraries, Religious Facilities	Compatible	with Insulation	M marginally Compatible	Incompatible
Hospitals, Clinics, Nursing Homes, Health-Related Facilities	Compatible	with Insulation	M marginally Compatible	Incompatible
Auditoriums, Concert Halls	Compatible	with Insulation	M marginally Compatible	Incompatible
Music Shells	with Insulation	with Insulation	Incompatible	Incompatible
Sports Arenas, Outdoor Spectator Sports	Compatible	with Insulation	Incompatible	Incompatible
Neighborhood Parks	Compatible	with Insulation	Incompatible	Incompatible
Playgrounds, Golf Courses, Riding Stables, Water Rec., Cemeteries	Compatible	with Insulation	Incompatible	Incompatible
Office Buildings, Personal Services, Business and Professional	Compatible	with Insulation	Incompatible	Incompatible
Commercial - Retail, Movie Theaters, Restaurants	Compatible	with Insulation	Incompatible	Incompatible
Commercial - Wholesale, Some Retail, Ind., Mfg., Utilities	Compatible	with Insulation	Incompatible	Incompatible
Livestock Farming, Animal Breeding	Compatible	with Insulation	Incompatible	Incompatible
Agriculture (Except Livestock)	Compatible	with Insulation	M marginally Compatible	Incompatible
Extensive Natural Wildlife and Recreation Areas	Compatible	with Insulation	M marginally Compatible	Incompatible

**LEGEND**

Compatible      with Insulation      Marginally Compatible      Incompatible

Source: ANSI 1980. Cited in Kyster 1984, p. 624.

**TO: Madison Plan Commission Members**  
**FR: Marsha Cannon, 5 Cherokee Cir. - #202, Madison, WI 53704**  
**RE: #72365 – Raemisch Farm Proposed Plat**  
**August 29 Meeting**

For the third time, the developer is presenting their plan for 63.5 acres at Raemisch Farm. As you evaluate the plan (which appears nearly identical to the plat presented to you in February), please consider the following:

**(1) Bike Lanes** should be minimum widths of from 62-74 feet if a street is anticipated to be a bicycle route that may have marked bicycle lanes.

One of the transportation strategies in the Comprehensive Plan is to “expand and improve the city’s pedestrian and bicycle networks to enable safe and convenient active transportation.” This proposed development has the potential to create many new residences, particularly within the TR-U1 and CC-T properties at the eastern edge. However, none of the street widths are wide enough to have a dedicated bike lane. MGO 16.23(8)(a) [8.vi](#) sets minimum street widths for streets with marked bicycle lanes (ranging from 62-74 feet, depending on whether street parking is not allowed or allowed on one side or allowed on both sides). One or more streets should be widened to provide bike lanes that connect to the N. Sherman bike route and/or Lakeview School.

PLEASE SEE MAP, NEXT PAGE

**(1) Notes on the Proposed Plat**

Note 2: In CCT (Lots 1 & 3) no residential will be constructed before 1/1/2027

Note 3: Any residential built within the projected 65 decibel area will utilize HUD guidance on sound attenuation methods.

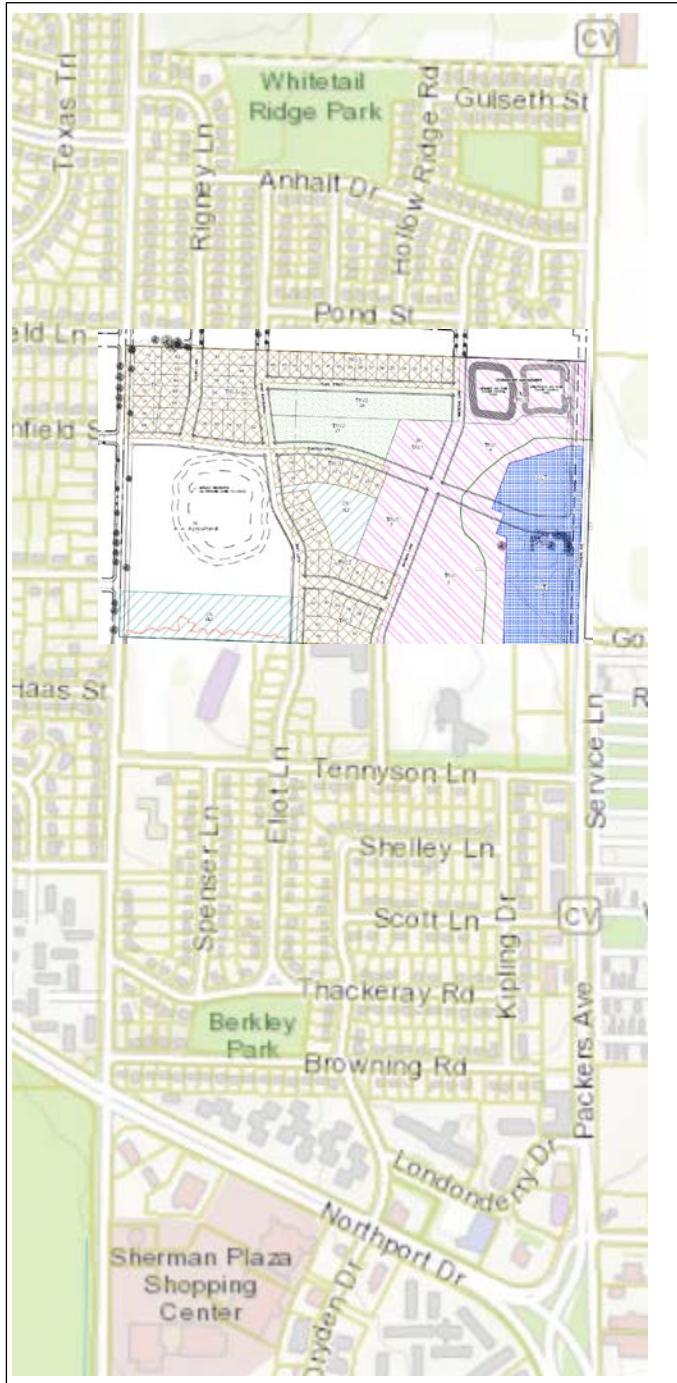
How will these notes be monitored and enforced with current or future developers?  
What is the penalty for violation?

The City has no control over the Raemisch Farm site. The applicant has said they would use measures to attenuate the airport noise. However, the City has no ability to enforce that promise. The applicant told the Council last February that they would prohibit any residential uses inside the 65 dB contour until at least 2027. Even if the applicant still has no plans to have residences within the 65 dB contour, that cannot be enforced by the City.

**(2) Covenants and Restrictions**

Note 9: Lots will be “subject to covenants and restrictions.”

- a. What restrictive covenants are anticipated?
- b. Will covenants be time-limited, renewable, or run with the land?



The 3 thru streets would likely be a preferred bike route to Lakeview Elementary for students residing at Raemisch Farm as well as those living in Whitetail Ridge homes to the North.

**Consider 62-74 foot widths for these streets:**

- Eliot/Prairieview (N-S)
- Whitetail/Whitman (N-S)
- Sunfield (E-W)

Lakeview Elementary School is shown as a (diagonal rectangle where Tennyson Lane meets North Sherman Ave. to the west.

## Noise Compatibility

Dane County is updating the Noise Compatibility Plan for Dane County Regional Airport, which will identify noncompatible land uses. The plan includes a Noise Exposure Map (NEM) and Noise Compatibility Program (NCP). The NEM is scheduled to be submitted to the FAA for final approval in December, 2022.

<https://www.msnairport.com/documents/pdf/MSN-20220426-Public-Mtg1-Boards-Final.pdf>

PLEASE SEE MAP, NEXT PAGE

The plan's documentation must address two time frames: (1) data representing the year of submission, and (2) a forecast year that is at least five years following the year of submission. Raemisch Farm appears near the center of the study area.

Two factors are likely to require changes in the current decibel contour map that the developer refers to:

- (1) Arrival of F-35 fighter jets in Spring 2023
- (2) Anticipated expansion of Dane County Regional Airport with more flights and larger planes being accommodated through airport improvements and expansion.

The eastern edge (the CC-T zoned parcels and some of the TR-U1 zoned areas) are within the 65 dB contour. With the new NEM currently being prepared, that contour line may expand or contract. The federal government has this to say about residences within the 65dB contour:

Where the community determines that residential or school uses must be allowed, measures to achieve outdoor to indoor Noise Level Reduction (NLR) of at least 25 dB and 30 dB should be incorporated into building codes and be considered in individual approvals. Normal residential construction can be expected to provide a NLR of 20 dB, thus, the reduction requirements are often stated as 5, 10 or 15 dB over standard construction and normally assume mechanical ventilation and closed windows year round. However, the use of NLR criteria will not eliminate outdoor noise problems.

[https://angf35eis.com/Resources/Documents/Draft\\_F-35A\\_EIS\\_August\\_2019\\_Vol\\_1\\_Part\\_1.pdf](https://angf35eis.com/Resources/Documents/Draft_F-35A_EIS_August_2019_Vol_1_Part_1.pdf)

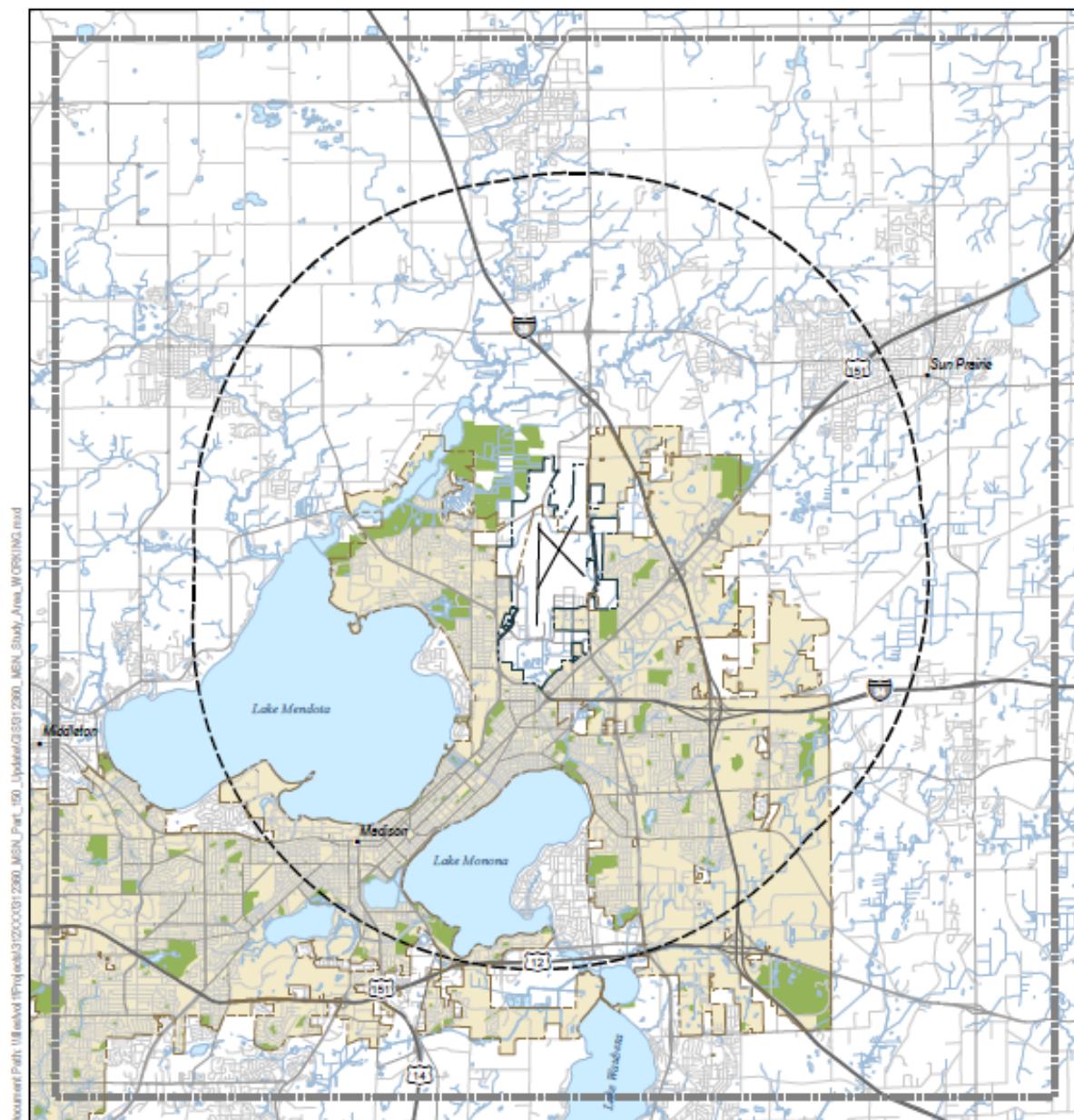
Since we currently do not know what parcels may come within the 65 dB contour, but will know within the next few months, perhaps it would make sense to have this additional information before determining appropriate land uses through rezoning.

The applicant is resubmitting a proposed plat that does not differ from the plat submitted to Council last February (at Council the applicant identified the proposed agricultural land). The only thing that has changed in the meantime is the approval of the development at the former Bimbo bakery which is also within the 65 dB contour. However, there are a number of differences between the Raemisch farms site and the Bimbo site – including how to address airport noise. The City has some level of control over noise at the Bimbo site. A stated in the disposition letter for 3401 E Washington:

The developer is strongly encouraged to incorporate noise mitigation strategies during construction of the buildings. Note: This would likely be required as part of an agreement for financial support from the City of Madison, and such strategies would be reviewed prior to issuance of building permits and inspected at appropriate stages of construction by Building Inspection staff.

<https://madison.legistar.com/View.ashx?M=F&ID=11134959&GUID=3EBA26AA-D845-434F-BD00-04803B82E589>

<b>Bimbo Bakery project is different from Raemisch Farm</b>	
Industrial site, abandoned since 2019	Productive farmland
Nonprofit developer, 501(c)(3) WI Housing Preservation Corp., Madison	For-profit developer Green Street Development, St. Louis, MO
6.4 acres	63.5 acres
On Bus Rapid Transit line	Not on Bus Rapid Transit Line
<b>Residential component:</b> <b>245 subsidized apartments in 4 buildings</b> 77 apts in a 5-story bldg. 110 apts in a 5-story bldg. 46 apts in a 3-story bldg. 12 town-homes in a 2-story bldg..	<b>Residential component: Uncertain, but estimate about 450 total residential units.</b> 76 detached single-family lots per plat, plus estimated 374 multi-family units. Details have not been provided for lots zoned CCT, TRV2 and TRU1 but developer has suggested “workforce” market-rate housing in buildings of unspecified number, size and height. <b>Marty Rifken’s original 2020 proposal</b> had 7 lots for multi-family or mixed use with 58 condos and 312 apartment units ( $76 + 58 + 312 = 436$ ).
<b>WHEDA tax credits</b> <b>Possible Tax Incremental Financing Dist.</b>	<b>No public financing</b>
<b>Developer committed to sound mitigation</b> <b>\$5,000/unit.</b>	<b>No sound mitigation required. Note on plat conveys goodwill but no way to enforce.</b>



- Airport Boundary
- Study Area
- FlightTrack Analysis Boundary
- Major / Minor Roads
- Lake / Pond
- Recreation / Open Space

0 2 4 Nautical Miles

**Dane County Regional Airport**  
Madison, Wisconsin

Figure:  
Project Study Area



[www.mh](http://www.mh)

*Draft Study Area Map*

**TO: Mayor Rhodes-Conway, the Madison Common Council, and Plan Commission**  
**FROM: Groundswell Conservancy**  
**RE: Preserving Agricultural Land Use and Community Opportunities on Raemisch Farm Property**  
**Legistar #72876 and #72365**  
**DATE: August 25, 2022**

In winter 2022, Green Street St Louis invited us to discuss conservation opportunities for a portion of the Raemisch property. Groundswell's interest is three-fold. We operate two urban farms serving Farmers of Color and New American farmers engaged in subsistence and market growing. In 2017, we partnered with Lake View Elementary School to add approximately one acre of woods to the school's campus and worked with Operation Fresh Start to build a nature exploration area on the property for students and the community. We also have a long history of protecting wetlands.

Green Street asked us to consider purchasing approximately 10 acres of the southwest corner of the Raemisch property adjacent to the approximately three acres identified as an expansion of Lake View's campus to operate an urban farm, manage the wetland, and expand our partnership with Lake View. Unfortunately, given the size of the wetland (and a conservation buffer around it), the amount of land needed to efficiently operate an urban farm, and the goals of the expansion of the outdoor education programs at Lake View, the area offered by Green Street did not provide us with adequate acreage for urban farming.

#### **Providing Equitable Access to Land for Farming**

Everyone depends on farmland, but many people who need land to grow food do not have access to it. New American farmers and Farmers of Color face many barriers to owning the land required to grow their own food or crops to sell. Community farmland helps solve this challenge and provides agricultural training and entrepreneurship opportunities. Groundswell helps overcome existing barriers by protecting and creating equitable access to agricultural land in high-need areas of Dane County.

At Groundswell's Pasley's Swan Creek Farm in Fitchburg, we partner with Neighborhood Food Solutions (NFS) and its founder, Robert Pierce. NFS runs two programs at the farm: PEAT (Program for Entrepreneurial Agricultural Training for teenagers) and FAIR (Farming After Incarceration Release). Participants learn how to grow crops and gain entrepreneurial business skills in budgeting, marketing, and sales.

At our Westport Farm in Waunakee, we have permanently secured 10 acres of farmland for Hmong farmers to grow vegetables and flowers for themselves and to sell. In 2021, we piloted the Lifting Hearts Therapy Garden for Hmong elders. Many Hmong elders in Madison were refugees who fled persecution because of their allegiance to the U.S. during the Vietnam War. Since agriculture is central to Hmong culture, engaging in gardening can often calm the lingering stress of wartime and immigration. Being able to contribute food to the family also boosts self-worth.

The Raemisch property is ideally situated for urban farming and programming supporting historically excluded groups:

- The property is close to where many low-income users live. It's within walking distance of users living at Packers Townhouses, Northport Apartments, the Brentwood Neighborhood, and Habitat for Humanity of Dane County Homes.
- Subsistence farming plots (size starts at  $\frac{1}{4}$  acre) on the site would allow families facing food insecurity to grow culturally relevant food free of chemical pesticides, fertilizers, and herbicides.
- Market farming plots (between 2 to 5 acres) would allow farmers to contribute to the local economy and supply vegetables to local consumers.
- Public transportation along Sherman Avenue creates access for users who may not own a vehicle or do not drive. Farmland on the outskirts of Madison or surrounding areas aren't accessible to users who may not own a vehicle or do not drive.
- There is opportunity for a hyperlocal food supply chain. The produce grown at the property can be sold directly to consumers at farmers markets, and wholesale to food aggregators and ethnic grocery stores, to local nonprofits seeking to procure from local farmers, and to value-added food entrepreneurs.
- Growing food adds value to people's lives. "Our family is stuck here. We can't afford to pick up and move elsewhere. [Groundswell] is adding value to our lives by making land accessible to our family." – Alley Chang, Habitat for Humanity Homeowner.
- The property provides opportunities to work with BIPOC organizations in need of land access for agricultural programs that focus on cultural food preservation, cultivating the next generation of agricultural entrepreneurs, cultural holistic approaches to maternal and child wellness, and healing through land from pain inflicted through war and immigration.

### **Nature Makes Learning Easier**

Only one-third of U.S. 8th graders are performing at or above academic standards for science and math. We need to improve. One way is to reconnect children with nature through outdoor learning and recreation. Research shows that children perform better academically, across all subjects, when they regularly spend time in natural environments. Schoolyards with green areas offer outdoor hands-on learning experiences that can be applied to all curriculum subjects.

Madison's Lake View Elementary School is an example of how nature makes learning easier. A majority of Lake View's students come from low-income families, typically living in apartments with no yard or nearby parks. This lack of connection with nature puts them at an educational, physical, and social disadvantage. In 2016, Susie Hobart, Lake View Elementary Outdoor Classroom Coordinator, approached Groundswell about purchasing a parcel of wooded greenspace to expand the school's existing School Forest. Working with Operation Fresh Start and the school, Groundswell removed invasive shrubs from the forest and built a new nature course with five large-scale stations that allow kids to learn through climbing, jumping, balancing, observing, reflecting, and working together to build reconfigurable structures and environments.

A natural extension of the school forest would be the connection all the way to the wetland on the Raemisch property, connecting to new habitat (wetland), and providing another connection for students and their families. Lake View Elementary School could also expand its school garden onto the property, and families of kids attending the school could grow food at the farm.

### **Raemisch Conservation Vision**

Groundswell envisions an approximately 35 acre community conservation landscape on the west half of the Raemisch property. This area would include land for urban farming, community conservation, and recreation that builds upon the successful programs at Lake View Elementary School. Similar to our two other urban farms, we would secure and manage the best farmland on the site for market and subsistence growers. Ideally, our farmers could connect with food processing concerns and take advantage of marketing opportunities on the eastern portion of the property. We would also be willing to expand our partnership with Lake View to restore and maintain forest, prairie, and wetland habitat north of the existing school campus.

Other opportunities include possible sites for early childhood services to low-income children aged 0-5 in our community, and affordable housing for first time homebuyers at or below 80% of median income in the Madison and Dane County area.

Finally, Groundswell works with willing landowners and has a very successful history of acquiring land for conservation purposes. Since our inception in 1983, we have permanently protected more than 13,000 acres of land in and around Dane County. We have spoken with Mr. Raemisch about our vision for his property. Should the opportunity come to work with him, Groundswell would explore acquisition opportunities directly with him.

**From:** [bilena\\_baldacchino@yahoo.com](mailto:bilena_baldacchino@yahoo.com)  
**To:** [Currie, Jael](#)  
**Cc:** [Plan Commission Comments](#)  
**Subject:** Green Street Development Proposal for 4150 Packers Avenue - Meeting of August 17, 2022  
**Date:** Tuesday, August 16, 2022 4:32:02 PM

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Caution: This email was sent from an external source. Avoid unknown links and attachments.

Dear Alder Myadze,

I have two concerns related to the above mentioned development:

1. We do not yet have actual measures for the loudness of the F35. The Common Council prudently postponed action on this development proposal until the F35s sounds can be determined. Let's hope that you will do the same. Development for economic / financial reasons, without consideration for actual health risks that may be involved, seems imprudent.
2. The 1.5 acre being reserved as 'undeveloped space,' is too small. A larger tract needs to be preserved for existing wildlife habitat, and not only that - green spaces also benefit humans, by offering free recreation and exercise areas in urban settings – something that the advent of COVID has invited us to take seriously into account in all public planning.

Thank you for your work as an Alder.

Sincerely Yours,

Rita Cairns  
1622 Lake View Avenue  
Madison, WI 53704