

Alex Saloutos

3318 Hammersley Avenue
Madison, WI 53705
Phone: 608/345-9009
E-mail: asaloutos@tds.net

October 4, 2021

Email: pccomments@cityofmadison.com

Plan Commission
City of Madison
Madison Municipal Building Suite 017
215 Martin Luther King Jr Blvd
Madison, WI 53703

Re: Deficiency of Draft South Madison Plan Related to Historic Preservation

Dear Commissioners:

The purpose of this letter is to call to your attention to what appears to be a significant deficiency with the current draft of the South Madison Plan (SM Plan), which is agenda item number 3 (Legistar [67570](#)) on the Plan Commission agenda today, October 4, 2021. The draft of the SM Plan fails to address historic resources located in the plan area and historic preservation goals or strategies, which is contrary to city policy.

Please note, the current draft of the SM Plan states:

“The South Madison neighborhood became one of the city’s first suburbs and home to historic culture and diversity not seen anywhere else in the city.”

However, the draft of the SM Plan is silent on historic resources located in the plan area and fails to include any recommendations for preserving them. As documented in the City of Madison Comprehensive Plan (Comp Plan), city policies embrace and support historic preservation. One of 12 goals in the Comp Plan states, “Madison will be a vibrant and creative city that values and builds upon its cultural and historic assets.” Strategy 2 in the Culture and Character section of the Comp Plan is, “Preserve historic and special places that tell the story of Madison and reflect racially and ethnically diverse cultures and histories.” Specific actions in the Comp Plan under Strategy 2 include, “Identify ways to retain older buildings and places that contribute to the special character of an area, or are associated with diverse cultures, through the adoption of sub-area plans prior to redevelopment pressures.” Finally, the Comp Plan states, “Sub-area planning efforts should identify the older buildings that should be retained and recommend the most appropriate means for doing so.”

I am currently traveling and unable to appear or speak at your meeting today about this important issue. Please give this deficiency in the draft of the SM Plan serious consideration and request that planning staff correct it by including, with meaningful community input, a section on historic preservation that identifies historic resources in the plan area with goals and strategies for their preservation.

Sincerely,



Alex Saloutos

pc: Landmarks Commission
Madison Trust for Historic Preservation

To: Plan Commission

From: South Madison neighbors listed below

Re: Request to Extend Completion of Portions of the SMP Update to Allow for Adequate Discussion About Latest Draft Plan

Date: October 4, 2021

Planning staff's last-minute addition to the draft South Madison Plan Update—proposed changes in land use and the creation of height limits throughout South Madison—were presented to the public for the first time on September 29, 2021. The proposed departure from the 2018 revised Comp Plan and Generalized Future Land Use (GFLU) map will directly impact South Madison residents; yet the public has not yet been offered the opportunity to discuss and comment on the new maps “up front” in either community meetings or with Planning staff. Instead South Madison citizens will be allowed to comment only “after the fact” when those draft documents are presented to the Plan Commission and the Common Council, without the opportunity for the give and take of meaningful discussion regarding the content of those documents.

We urge the Plan Commission to correct this aberration of the South Madison community planning process by directing the Plan Department to extend the completion date for all portions of the new South Madison Plan Update except those dealing with the Town of Madison. A bifurcated approval process will allow for the timely authorization of land use designations and zoning for the Town parcels, while ensuring that the city engages the South Madison community in the extensive public discussion and input process that is supposed to be a part of the South Madison Plan Update and revisions to the Comp Plan.

We further urge the Commission to direct Planning staff to include residents of Bay Creek (District 13) in these conversations. The Bay Creek Neighborhood was not included in the South Madison Plan Update planning process based on the assumption that the Update would not have any impact on Bay Creek and that the portion of the 2005 South Madison Neighborhood Plan that pertained to Bay Creek would carry over to the plan Update. However, the proposed changes in land use and the new height map extend to the wedge of land bounded by John Nolen, East Olin, and Wingra Creek. This wedge is technically in District 14, but it is immediately adjacent to the Bay Creek neighborhood, and the changes proposed on September 29, 2021, for the wedge would have their most direct impact on Bay Creek residents. Even before this date, South Madison residents have been requesting a plan for the wedge inclusive of community input, a request that seemed to be taken seriously for the first time at the Plan Commission meeting of July 26, 2021, Plan meeting in connection to imminent development of 222-232 East Olin.

Lastly we urge the Commission to direct the Plan Department to create a comparative GFLU map that highlights the proposed land use changes by presenting them alongside the land uses established by the 2018 Imagine Madison Comprehensive Plan and GFLU. This comparison will enable viewers to see more precisely whether the proposed changes fulfill the SMP Update's explicit charge to “preserve single family homes; additional opportunities for community wealth building, affordable housing; opportunities to age in place in South Madison, preserve the mobile home park; preserve affordable spaces for businesses, preserve existing local businesses, and provide spaces for neighborhood serving retail” as well as promote equitable healthy food access and living-wage/long-term employment for, and use of the area's parks/recreation by the community.

We also request an explanation and discussion of the following:

1) Regional Mixed-Use Zoning (RMX) and Regional Mixed-Use Land Use (RMU): Adopted 2/21, the RMX zoning designation is “intended to provide opportunities for high-intensity mixed-use centers supporting a variety of multifamily housing options and commercial activities that serve the needs of the regions. These areas typically include **large-scale sites**,..” according to the Drafter's Analysis. The draft SMP Update changes the small area comprising the wedge to an RMU land use. This area is much smaller than other existing RMU areas in the GFLU. However on page 10 of the draft SMP Update the wedge continues to have SE zoning.

- What is the relationship between RMX zoning and RMU land use?
- Is the intent to change the zoning of the wedge from SE to RMX?
- Would this small site qualify to meet the intent of RMU land use and/or RMX zoning?

2) Height map: The proposed changes in land use designation and zoning along with the newly proposed height map is for the entire area covered by the SMP Update. Other existing height maps cover much smaller areas (Downtown, a portion of the Willy Street corridor, etc.).

- Why is a height map proposed for the entire area covered by the SMP Update?
- Would this height map make it more likely for a developer to request and receive a CUP for stories beyond the number allowed by right by arguing that the city anticipates such requests via the height map?

3) Reference to “approved AEC Campus Master Plan”: Contrary to the resolution authorizing the South Madison Plan Update stating that “the planning process will not include the Alliant Energy Center property since Dane County recently approved a master plan for this area,” the Master Plan has not been “approved” by Dane County. On 12/17/18, the AEC Comprehensive

Master Plan Oversight Committee received the final version of the AEC Campus Master Plan from the consultant but took no action. On 12/20/18, Perkin + Will, the county's consultant, presented the Plan to the Dane County Board Committee of the Whole, but no action was taken. On 02/21/19, the County Board established the AEC Redevelopment Committee but did not adopt or approve the AEC Campus Master Plan. We request that the Plan Commission direct planning staff to either: 1) provide evidence that the County Board has, in fact, "approved a master plan" for the AEC Campus; or, 2) remove all references to, and reliance on, such an approved master plan from the subject draft plan.

By exploring these and other questions that citizens will bring to the additional Update meetings that we request, we can ensure that the South Madison Plan Update is grounded in community support and contains what's best for the community.

Signed,

Richard Attix (506 Pine)
Barb Bailly (540 W Olin)
Linda Baumann (718 W Lakeside)
John Beeman (540 W Olin)
Clarence Cameron (633 Cedar)
Dave Davis (210 Kotter)
Steven Davis (813 W Lakeside)
Brian Kaye (217 Van Deusen)
Laurel Kinosian (629 Cedar St)
Lisie Kitchel (225 Potter)
Joe Koss (606 W Lakeside St)
Robert Lockhart (633 Cedar)
Janelle Munns (818 W Lakeside)
Judy Robinson (523 W Olin)
Carrie Rothburd (830 W. Lakeside)
Charlene Sweeney (114 E Lakeside)
Daniel Thurs (830 W Lakeside)
Stefan Westman (818 W Lakeside)

Plan Commission
Meeting of October 4, 2021
Agenda #3, Legistar #67570, Update on the South Madison Plan

I am not a South Madison resident, but the proposed heights are of concern to a broader part of the City.

12 Stories

The draft South Madison Plan would create a fringe of 12-story buildings along the northeast side of John Nolen and on East Olin -- including the site of the recent proposal for 222-232 E. Olin that was placed on file.

At the Plan Commission meeting on 222 E Olin, residents spoke (via Zoom or via written comments) about the value of Olin Park and Turville Point Conservation Park – this is one of the few places residents can go and get away from the City, that an 18-story building will likely loom over the park and change residents’ ability to get away from the City and to relax, that at night there will be intrusion of light pollution, an issue for people and for wildlife and migrating birds. Alder Evers (minute 3:25) spoke to this 18-story building being able to be seen from many vantage points throughout the City, including parks that are vital urban oases and were included in our founders’ vision for the City with the natural beauty in and around the isthmus as essential to human health, and spoke to the need to seek to minimize light pollution and preserve the night sky.

A 12-story building on John Nolen is an issue because of the location. About 70% of this 12-story stretch abuts the Turville Point Conservation Park, the other portion abuts the lake (with the railroad tracks intervening). A conservation park, per City ordinances, is a “designated parkland within the City of Madison, operated and maintained by the Parks Division for education and passive recreational purposes compatible with the preservation of the City’s natural resources.” The intent of the ordinance: “The Common Council declares that it is important to the residents of Madison that the City preserve Madison’s native landscapes, its plant and animal populations for residents’ careful use and full enjoyment. The following regulations are enacted to secure this natural beauty and the concomitant recreational opportunities for current and future generations.”

What effect will 12-story buildings have on the wildlife (particularly housing with lights on at night)? How much will residential enjoyment of the park be impeded by a 12-story building looming at the edge of the park, almost certainly visible from the prairie? What of views from the lake or other natural areas, areas that would no longer seem to be an oasis from the city? Currently, this stretch of John Nolen contains 8 buildings: 2 one-story; 1 two-story; 1 three-story; 2 four-story; 1 five story (with a 6th story that has a floor area of about 20% of the lower floors); and 1 seven-story (with an 8th story that has a floor area of about 30% of the lower floors). Currently, any building portion above 2 stories has a rear yard setback of at least 100 feet. Under SE zoning, this goes down to 30 feet (or to 20 feet if rezoned to TE).

Page 33 of the draft plan states: “The building heights relate to the proposed land use and zoning classification for properties.” Yet there is not an explanation of how 12 stories along John Nolen relates to the SE zoning classification (5 stories for mixed-use and 4 stories for residential, with additional height as a conditional use). There is a large portion of SE south of the Beltline which is limited to 5 stories, so why is there a difference?

Olin Triangle

Page 44 of the draft plan addresses the Olin Triangle. This triangle consists of 3 parcels and is proposed for a Regional Mixed Use land use category. The Comprehensive Plan States that RMU "includes existing and planned high-intensity centers supporting a variety of multifamily housing options and commercial activity serving the needs of the region. These areas typically include large-scale sites supportive of multistory buildings up to twelve stories in height, subject to recommendations in adopted sub-area plans. ... As regional destinations for retail and jobs, RMU areas should be well connected with the adjoining street network and be transit-oriented."

Is the Olin triangle a "large scale" site? This triangle consists of about 7 acres, 4 of which would be available for 12 story development. Compare that to the other "large scale" sites where RMU has been assigned. The draft Greater East Towne Area Plan has a RMU designation at the core of the mall area - for about 85 acres. The Odana Area Plan designates 4 sections as RMU, the smallest of which is 14 parcels and 18 acres. The Oscar Mayer Special Area Plan has no RMU.

During the Comprehensive Plan process, it was often remarked that the GFLU map is *generalized* land use. For example, "staff has generally tried to avoid such small stand-alone designations to maintain the generalized nature of the GFLU map." Yes, there are small sites on the GFLU map that consist of under an acre, so it is not unheard of to have small area with a different land use designation. But the RMU designation is reserved for the most intensely developed areas outside of the downtown. Does this triangle qualify on its own for RMU? What commercial activity on this triangle will be "serving the needs of the region"? What "variety of multifamily housing options" will be supported in this small area? It is not as though the Alliant Energy Center has a RMU designation and this triangle would merely be an expansion of that RMU. Or why should this triangle be RMU when the stretch of potential 12-story buildings along John Nolen remains SE?

The justification is: "The proposed Regional Mixed-Use (RMU) recommendation is consistent with a recommendation in the Destination District Vision and Strategy (DDVS) adopted by Dane County in 2018 as part of its Alliant Energy Center Campus Master Plan efforts, which identifies the area for mixed-use redevelopment in taller buildings to take advantage of views of Lake Monona."

Neither the Alliant Energy Center Campus Master Plan nor the Destination District Vision and Strategy have been adopted by the City, so they are not exactly relevant. But if one chooses to use them:

- (1) The DDVS has 16 acres labeled as "Lakeview Area." If the DDVS is relied on to justify RMU, should not all sites in the Lakeview Area be deemed RMU?
 - This includes the area north of Wingra Creek. Though the draft plan does not cover the area north of the creek, if RMU is accepted for the triangle based on the DDVS, does that mean the area north of the creek will also become RMU and 12 stories? That Goodman Park, and the City's traffic building will become RMU?
 - This includes the area north of Willow Island, a site the AEC Master Plan pegs for a mixed-use office building. Yet the draft plan does not address this area. The DDVS says: "Take advantage of the lake and Capital views by developing the AEC north of Willow Island with office use."
 - The DDVS statement on page 20: "Analyze the placement of development to maximize the views while also being sensitive as to not obstruct the views of others." If the triangle gets 12 stories, does the area north of Willow Island get more stories so that they, too, can have a view?

- (2) What of the DDVS statement about serving a mix of incomes in the Lakeview Area? Page 20: "Develop variety of housing types north of Olin Avenue with lake oriented views that serve a mix of incomes." Yet the draft plan does not reflect the goal of serving a mix of incomes in this triangle area.
- (3) The AEC Master Plan, page 46, reflects building heights. Along John Nolen there are 3 residential buildings (205 units, 90 units, and 180 units), all 8 stories in height. The mixed-use buildings along Rimrock are 2 stories in height, and the three retail buildings are at 1 story. So, if the AEC is 8 stories, why should surrounding properties be more intensely developed?

AEC Campus Master Plan

The draft plan says: "The Alliant Energy Center is excluded from the study area because at the time the resolution was introduced, City policy makers felt it was not an efficient use of limited planning resources to plan for an area that recently had gone through a public planning effort led by Dane County." The resolution authoring a South Madison Plan update said: "the planning process will not include the Alliant Energy Center property since Dane County recently approved a master plan for this area."

Dane County has not officially approved the master plan.¹ Had it done so, it would be possible to reflect land use and zoning in the in the draft South Madison plan based on the master plan. Instead, it looks like Dane County is counting on planned development zoning – or at least that is what the appraisal was based on. (Page 11 of the RFP)

The area north of Willow Creek, the area along John Nolen south of Willow Creek, and about 75% of the Rimrock Road frontage are slated for private development. The master plan states that the likely redevelopment scenario for the private development sites will be a land lease with the

¹ - The Alliant Energy Center Comprehensive Master Plan Oversight Committee held its final meeting on December 17, 2018. The agenda had one action item, final recommendations of the AEC Campus Master Plan. No minutes are available.

- On November 19, 2018, the Committee received a Destination District Vision and Strategy update. No action was taken. The master plan mentions the Destination District process and strategies and has this to say about the Destination District: "2018 Destination District Vision and Strategy (Ongoing study by Vandewalle & Associates)."

- The County Board, at its meeting of December 13, 2018, received a presentation on the master plan. No vote was taken.

- The Board adopted Resolution 2018 RES-498 on February 22, 2019, creating the Alliant Energy Center Redevelopment Committee. The only duties of this committee listed for this committee were "addressing financing and governance issues associated with campus redevelopment as well as review of public and private investment in the Alliant Energy Center." The Board may have implicitly endorsed the master plan as it said in its resolution: "While the multi-year robust planning process provides a road map for transforming the Alliant Energy Center to serve the community for generations to come, the county now must turn to the work of prioritizing recommendations and making choices for the next steps."

- An RFP was issued in March: "The Alliant Energy Center of Dane County campus is seeking a professional, highly experienced, master developer to create an award-winning, comprehensive, full campus redevelopment designed to be the destination district of Dane County and Madison, WI as well as the gateway to the beautiful and highly traveled corridor of John Nolen Drive as the entrance to downtown Madison."

- This RFP was, apparently, under the purview of the Alliant Energy Center Redevelopment Committee. The Committee will be holding a meeting tomorrow (October 5), one agenda item is: "Alliant Energy Center Developer Selection Process Update."

County maintaining ownership of the land (but the RFP does leave open the possibility of land sale.) Doesn't the intensity of development around the Alliant Energy Center campus depend, at least to some extent, on what is going to be built on Dane County's property?

It also worth considering Dane County's planning efforts. What was that public engagement? Appendix A of the Alliant Energy Center Mater Plan ("AECMP") states:

"The Alliant Energy Center hosted an information meeting for area neighbors on June 6, 2018 to gain their perspective on the biggest concerns and greatest opportunities for the area going forward as the Alliant Energy Center and surrounding non-residential areas grow and develop.

There were 25 registered participants at the meeting."

There was also a "Destination District Vision and Strategy on September 12, 2018 with 49 attendees signing in at the meeting.

<https://aecstudy.countyofdane.com/documents/DESTINATION-DISTRICT/DestinationDistrict-Keypad-Polling-Results-9.13.18.pdf>

There were apparently 7 outreach meetings held in 2014, and the AEC Campus Master Plan says that "feedback was also obtained via POLCO online polling, at Brat Fest, and at other public events."

It is questionable the extent to which the AEC Campus Mater Plan reflects even that limited public engagement. Some resident comments included: "For future commercial development, don't want very high end, or "McDonalds". Focus on locally owned, unique establishments; significant high rise commercial development adjacent to existing neighborhoods (should that take place) would negatively impact the community." And there were many comments about noise.

<https://aecstudy.countyofdane.com/documents/CSL%20Notes%20from%20July%2025%202014%20meeting.pdf>

Miscellaneous comments on maps

The residences along Badger Lane/E Badger Road are being zoned SR-C1, or perhaps TR-C1, which have a maximum height of 2 stories/35 feet. Yet the height map shows about half this area at 3 stories and about half at 5 stories.

For the properties east of Badger Lane, the Access Dane site contains the following notation: "Some portion of this parcel either contains or is in close proximity to sensitive environmental features (i.e. shorelands, floodplains, or wetlands), and Dane County regulations may apply. Please contact the Dane County Zoning Division at (608) 266-4266 for additional permitting information." Should this be factored into what is appropriate zoning for this area?

Respectfully Submitted,
Linda Lehnertz