

**From:** [Alex Saloutos](#)  
**To:** [Plan Commission Comments](#)  
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**Subject:** Public comment regarding 415 W Gilman Street, Legistar ID Nos. 91234 and 90614  
**Date:** Monday, April 13, 2026 5:09:25 PM  
**Attachments:** [260413 LEGISTAR91234 MEMORANDUM PLANCOMMISSION.pdf](#)

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Commissioners:

Attached are my public comments regarding the demolition permit and conditional use permit applications at 415 West Gilman Street, which are on tonight's agenda. The staff report has three deficiencies that prevent the Plan Commission from making the findings required by law. I respectfully request that the Plan Commission refer these applications and direct staff to prepare a supplemental report.

Cheers,

A handwritten signature in black ink, appearing to be the letter 'A' with a horizontal stroke extending to the right.

Alex Saloutos  
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Email: [asaloutos@tds.net](mailto:asaloutos@tds.net)

## M E M O R A N D U M

**Date:** April 13, 2026

**To:** Plan Commission

**From:** Alex Saloutos

**RE:** **415 W Gilman Street—Consideration of a demolition permit (Legistar ID No. 91234) and conditional use permit (Legistar ID No. 90614) (District 2)**

The staff report for the demolition permit and conditional use permit applications at 415 West Gilman Street (Legistar ID Nos. 91234 and 90614) has three deficiencies that prevent the Plan Commission from making the findings required by law.

The plan consistency analysis omits the Historic Preservation Plan. The demolition permit approval standard in MGO § 28.185(6)(c) requires the Plan Commission to consider the City's adopted plan recommendations. The Common Council adopted the Historic Preservation Plan in May 2020, directing staff to implement its recommendations.<sup>1</sup> The Historic Preservation Plan does not appear anywhere in the staff report's plan consistency analysis. The Landmarks Commission unanimously found Master Hall to have Category A historic value, and the staff report's plan consistency analysis does not engage with a single goal, strategy, or recommendation in the Historic Preservation Plan.

The plans the staff cited were read selectively. The staff report acknowledges, in passing, that the Downtown Plan requires consideration of historic resources when determining whether a building may be built to the maximum height for a given site. It does not analyze what that means for the proposed demolition of Master Hall, a Category A historic building with potential eligibility for listing on the National Register of Historic Places. The Comprehensive Plan's Culture and Character element establishes that Madison will be a vibrant and creative city that values and builds upon its cultural and historic assets, and that Madison will have a unique character and strong sense of place in its neighborhoods and the city as a whole. It includes a strategy to preserve the historic and special places that tell the story of Madison and reflect racially and ethnically diverse cultures and histories. The staff report's plan consistency analysis does not address any of these.

The staff report applies the wrong legal standard to the conditional use. Wisconsin Statutes § 62.23(7)(de) requires the applicant to demonstrate through substantial evidence that all requirements and conditions of the conditional use ordinance are satisfied. The staff report acknowledges this, noting that "state law requires that conditional use findings must be based on 'substantial evidence' that directly pertains to each standard and not based on personal preference or speculation." It then substitutes staff conclusions for that examination. Stating that staff believes the Plan Commission can find a standard met is not a finding that the applicant has demonstrated compliance. It is a statement of the staff's opinion.

For the foregoing reasons, the Plan Commission should:

1. Refer this application to a future meeting and direct staff to prepare a supplemental report that addresses the three deficiencies described above.
2. Direct the supplemental report to analyze the application's consistency with all applicable plans in their entirety, including the Historic Preservation Plan, with a complete and even-handed reading of all relevant goals, strategies, and recommendations.

3. Direct the supplemental report to examine the record for substantial evidence of compliance with each applicable conditional use approval standard.
4. Consider adopting standards for the preparation of staff reports that require: (1) analysis of all applicable plans, including supplements to the Comprehensive Plan; (2) a complete and even-handed reading of each plan's relevant goals, strategies, and recommendations, including those that weigh against approval; and (3) identification of the evidence in the record supporting each applicable approval standard, with staff's conclusions distinguished from that evidence.

<sup>1</sup> The Historic Preservation Plan was adopted by the Common Council on May 27, 2020, Legistar File No. 59575.

**Relevant Links**

Legistar ID File No. 91234:

<https://madison.legistar.com/LegislationDetail.aspx?ID=7780134&GUID=9C8D3173-B7A2-4E4E-9EF5-F68F65FAAA63&Options=&Search=>

Comprehensive Plan Part 1: <https://plans.cityofmadison.com/interactive-comprehensive-plan?document=1#page=1>

Comprehensive Plan Part 2: <https://plans.cityofmadison.com/interactive-comprehensive-plan?document=2#page=1>

Historic Preservation Plan: [https://www.cityofmadison.com/dpced/planning/documents/historic-preservation/historic-preservation-plan/Historic\\_Preservation\\_Plan.pdf](https://www.cityofmadison.com/dpced/planning/documents/historic-preservation/historic-preservation-plan/Historic_Preservation_Plan.pdf)

Staff Report: <https://madison.legistar.com/View.ashx?M=F&ID=15314309&GUID=61BAA3AD-77BA-4A79-ADA0-93CC333734BF>

Landmark Nomination:

<https://madison.legistar.com/View.ashx?M=F&ID=15315810&GUID=D3871B3A-44B7-4B4F-BBB5-96F520D19286>

<sup>1</sup> The Historic Preservation Plan was adopted by the Common Council on May 27, 2020, Legistar File No. 59575.

**From:** [David Noel](#)  
**To:** [Plan Commission Comments](#)  
**Subject:** Master Hall - Planning Commission  
**Date:** Monday, April 13, 2026 1:22:15 PM

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You don't often get email from davidnoel1010@gmail.com. [Learn why this is important](#)

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Dear City Planning Commission,

After listening to a recent planning commission meeting, I felt compelled to voice my opposition to the historic designation of Master Hall.

Having spent 25 years in the State Street area, I find the claim that this building holds major value to be inaccurate. The structure lacks any curb appeal or historic charm; in its current state of disrepair, it is more of an eyesore than a landmark.

Thank you for your consideration.

Sincerely,

David Noel

4/13/26

Master Hall  
415 W. Gilman St.  
Madison, WI. 53703

Personal comments and observations for Planning Commission meeting on  
4/13/26-Agenda Item #91234:

I am writing these comments and observations as a resident of the city of Madison for 41 years, a volunteer of the Madison Trust for Historic Preservation, and a retired builder with 40 plus years of experience. After reviewing the Owner's condition report, I wish to provide the following comments and observations informed by my experience as a builder.

Based on my street-view observation of the exterior of the building ( I was unable to inspect the interior of the building), it is evident that the building is in very sound structural condition. After reviewing more than 50 years of Building Inspection records/violations for this property I found the majority to be nuisance/maintenance related. I saw no records or violations that address any structural concerns.

Without knowing the motivations of the building owner with respect to making major improvements to Master Hall listed in the developer's condition report, there doesn't appear to be any immediate urgency to make such improvements, especially when one considers the Building Inspection records over 50 plus years. The building can certainly operate into the foreseeable future with minimal ongoing maintenance and improvements rather than embarking on a major renovation, if the owner so chooses.

Upgrading existing buildings can be challenging to say the least. During major upgrades or alterations, everything from interior finishes, mechanical, electrical and plumbing systems, to safety and accessibility concerns are considered in the planning process. Upgrades on existing buildings require a highly specialized and experienced design/build team who know how to integrate a creative vision, working within the building code and specific nature of the building, in order to compete in the rental market.

I believe that if the owner chose to renovate the building with the goal of long term maintenance and preservation, including appropriate life safety and accessibility upgrades, this goal can be achieved under either a Level 2 or 3 classification of the 2021 International Existing Building Code (IEBC). Although a comprehensive fire

suppression system would need to be installed under either classification, other alternations governed by the code, including accessibility improvements, have more design flexibility under the code. Section 306.7 (Accessibility for Existing Buildings) of the IEBC, which would govern any such renovation, states that an alteration shall comply with accessibility requirements **“unless technically infeasible”** and where a requirement is infeasible, the alteration **“shall provide access to the maximum extent technically feasible”**. Energy code compliance for existing buildings offer similar flexibility.

Unfortunately I am unable to comment on repairing or replacing the existing elevators as I have not looked at the interior of the building. However, installing a new Limited Use/Limited Application elevator (LULA) to allow accessibility at the first floor split-level may be feasible. Looking at the photo in the condition report it appears that with some creative design and rebuilding of the existing half-flight stairs, a LULA may in fact fit into the existing space.

With skilled, experienced planning and a willingness of the owner to see it through, a building's finishes, mechanical systems and safety concerns can be vastly improved. There are hundreds of other renovations and adaptive-reuse projects throughout Madison that exemplify this. Master Hall has the ability to join the ranks of other historic buildings that are now very popular apartments and retail destinations.

Respectfully submitted,  
Sam Breidenbach