

October 5, 2024

To: Madison Landmarks Commission

From: Patrick McDonnell

Re: Legistar #85180

The Wiedenbeck Apartments consists of two buildings on the landmarked parcel at 619 W Mifflin St. Together with a third, non-landmarked, building at 699 W. Mifflin St. they comprise a three-building rental complex linked by two courtyards. The 619 parcel contains the landmarked warehouse and a newer 1987 building. The third building on the smaller 699 parcel is also from 1987.

The developer is proposing to replace the two 1987 buildings with a single, larger structure.

In anticipation of this, they are requesting that the city divide the landmarked parcel, transferring over approx. 60% of it to the 699 parcel, which is not landmarked. This division would segregate the landmarked structure onto a much smaller, legally separate, parcel.

This proposal is not in the interest of the city as it jeopardizes the long-term prospects for the preservation and maintenance of the historic landmark. A better approach is the simple combination of the two parcels. Here's why:

The developer has indicated that the historic structure is in need of significant upgrades and redress of deferred maintenance. They suggest that the more profitable new building that they are proposing will provide the funds necessary to preserve the landmark well into the future. While the city may be willing to accept this economics-of-stewardship model for historic preservation, the only way to assure that the bargain will be kept in perpetuity is to keep the old and new buildings on the same parcel.

If the current 97-unit complex does not generate enough income to adequately maintain the historic structure, then segregating it as a stand-alone 24-unit apartment building (that could be sold off at any time) would only diminish its already precarious economic viability by depriving it of 60% of its income-producing land. While the developer currently expresses no interest in spinning off the historic structure, the proposed re-drawing of the 619 parcel would enable this outcome at any point in the future either by them or a subsequent owner. Indeed, it makes it the most likely outcome.

Therefore, the reduction of the 619 parcel is not a trade-off the city should accept. The better approach is to expand the landmarked parcel by combining 619 and 699. The city could then approve replacement of the two 1987 buildings with one new, more profitable building that would both meet the Secretary of the Interior's Standards and assure the long-term preservation of the landmarked structure.

Bailey, Heather

From: Kurt Stege <kurt.stege@gmail.com>
Sent: Sunday, October 6, 2024 11:21 PM
To: Madison Landmarks Commission; Latimer Burris, Amani; jmorrison@knothebruce.com; knkaliszewski@gmail.com; Taylorm@firstweber.com; rba@stonehousedevlopment.com; Bailey, Heather
Subject: 10.7.24 Landmarks Comm. meeting, Agenda Items 2, 3, 4
Attachments: Trinitas lot redivision size comparison.pdf; Southeast Elevation of Trinitas proposal with landmarks.jpeg

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

This email and attachments relate to the various proposals being advanced by Trinitas being considered by the Madison Landmarks Commission, Legistar File 84154, 85180, 85181.

I am submitting this on behalf of the Madison Trust for Historic Preservation.

A couple of comments regarding the Trinitas slide submission titled: 85180 - 85108 - 619-699 W Mifflin Submittal:

1. Slide 55 fails to reflect the relative scale of the locally landmarked Wiedenbeck-Dobelin Warehouse with the proposed Trinitas building. The slide only includes about 6.5 floors (about 70 feet) of the 10 floors (plus mechanical screen which makes a total of 125.5 feet) of the proposed building. It makes no attempt to reflect the entire front facade of the proposed building in relationship to the landmarked structure. In addition, the slide fails to reflect the balconies and the apparent 4th floor terrace pergola, details that are not missing on Slide 43.
2. Slide 61 identifies the proposed building height as approximately 108' to 112'. However, Slide 43 shows a "roof level" of 111.5', which does not include either the masonry parapet above the roof, or the mechanical screen above the masonry parapet. The total height to the top of the mechanical screen that extends about half way across the 209' width of the 10-story tower.

Enclosed are two additional documents:

1. A "Trinitas Lot Redivision Size Comparison" which includes a chart on page 2.
2. A "Southeast Elevation" (to scale) comparing outlines of the southeast facades of three relevant buildings in their relative positions. Note that the 1903 Milwaukee Road Depot is set at an angle relative to the other two buildings, and that I did not have its measurements. The representation is an estimate from Google Map images.

I will be offering public comment at Monday's Commission meeting on behalf of the Madison Trust for Historic Preservation. Because I am submitting these materials late in the day before the meeting, because I will have no way to know whether they have been carefully examined by the Commissioners before the meeting, and because the meeting is being held virtually, **I would like to have images of both the "Southeast Elevation" and the chart on page 2 of the "Trinitas Lot Redivision Size Comparison" projected during my public comments.**

Thank you.

Kurt Stege

Advocacy Committee Co-chair
Madison Trust for Historic Preservation

Trinitas lot redivision size comparison

Relevant language in the ordinance:

- **41.18 - STANDARDS FOR GRANTING A CERTIFICATE OF APPROPRIATENESS.**

A certificate of appropriateness shall be granted only if the proposed project complies with this chapter, including all of the following standards that apply. . . .

(4) Land Divisions and Combinations. **The commission shall approve** a certificate of appropriateness for land divisions, combinations, and subdivision plats of landmark sites and properties in historic districts, **unless it finds that the proposed lot sizes adversely impact the historic character or significance of a landmark, are incompatible with adjacent lot sizes**, or fail to maintain the general lot size pattern of the historic district.

* * *

Proposal: Trinitas proposes that the parcel containing the Wiedenbeck & Dobelin Warehouse be reduced from 45,648 square feet to 14,797 square feet (Lot 2 of CSM).

Lot sizes drawn from DCi map of parcels.

Current lot of Wiedenbeck & Dobelin Warehouse, Parcel 070923229095: 45,648 square feet. Lot 2 would be **32%** of this size.

Art lofts, Parcel 070901156009: 188,622 square feet. [Not a landmark, unchanged size.] Lot 2 would be **8%** of this size.

Washington School, Parcel 070923229300: 116,037 square feet. [Landmark, but not adjacent.] Lot 2 would be **13%** of this size.

The Lark, Parcel 070923229334: 37,794 square feet. [Not a landmark, adjacent?] Lot 2 would be **39%** of this size.

U-Haul, Parcel 070923229102: 65,644 square feet. [Not a landmark, unchanged size.] Lot 2 would be **23%** of this size.

699 Station, Parcel 070923229285: 16,672 square feet. [Not a landmark, and **will no longer exist.**] Lot 2 would be 89% of this size.

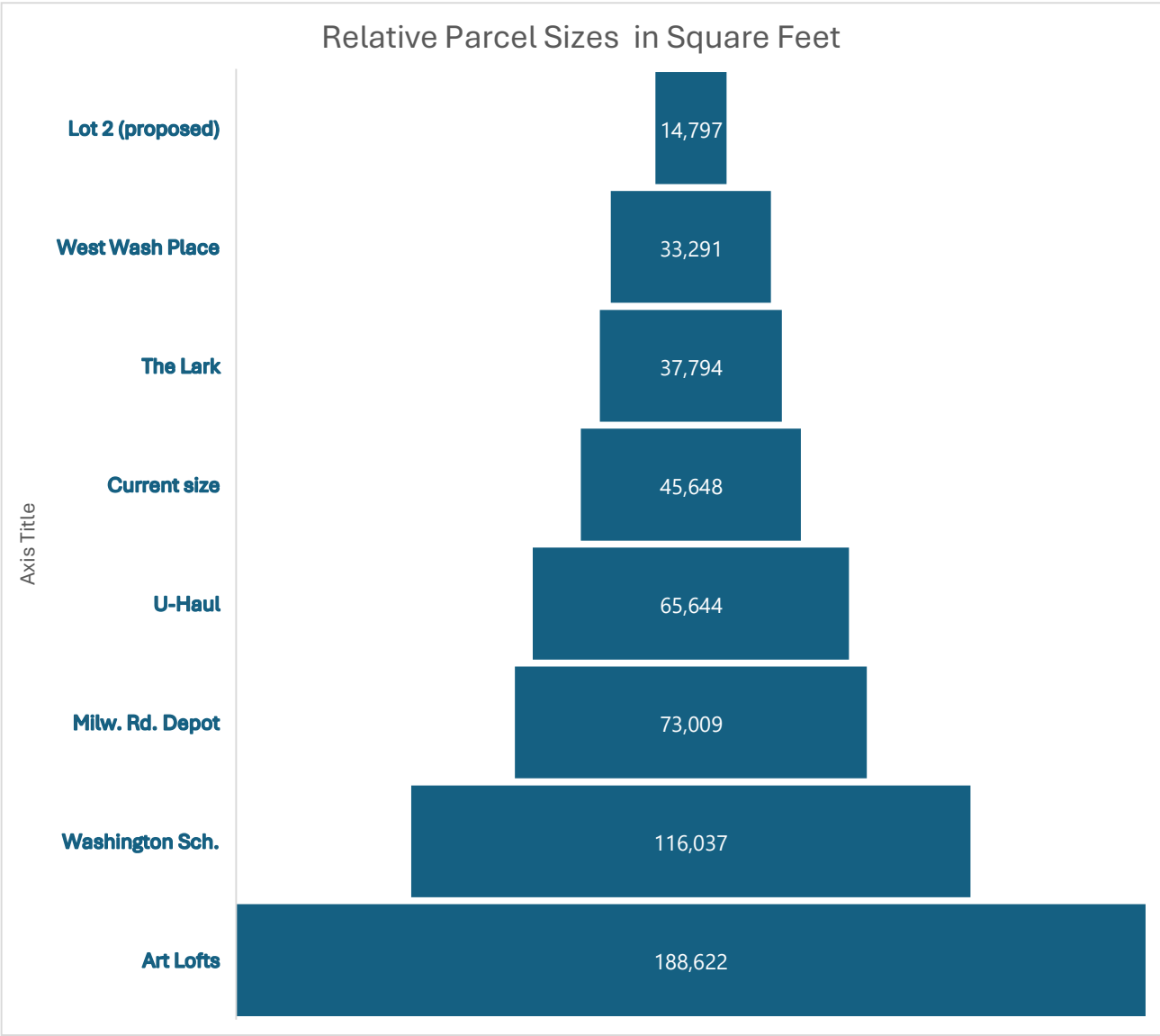
Milwaukee Road Depot, Parcel 07092322925: 73,009 square feet. [Landmark, but not adjacent.] Lot 2 would be **20%** of this size.

West Washington Place, Parcel 070923229342: 33,291 square feet. [Not a landmark, unchanged size.] Lot 2 would be **44%** of this size.

New lots proposed in CSM submitted by Trinitas:

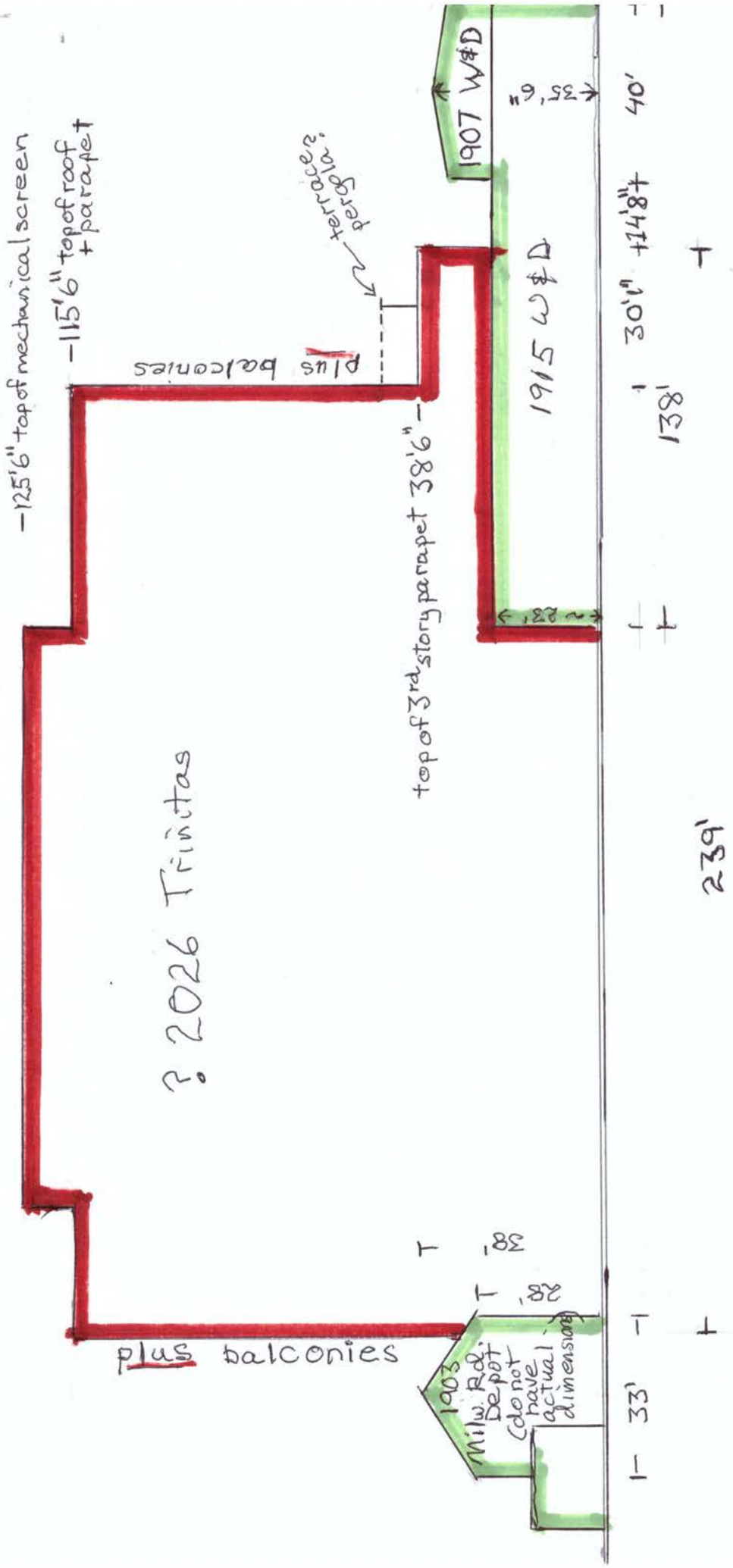
Lot 1 (location of proposed new building): 47,540 square feet. Lot 2 would be **31%** of this size.

Lot 2 (proposed location of Widenbeck & Dobelin Warehouse): 14,979 square feet.



For: October 7, 2024 Landmarks Commission meeting
 Agenda items 2, 3, 4

Madison Trust for
 Historic Preservation
 October 6, 2024
 Kurt Stege



Southeast Elevation
 (to scale unless otherwise noted)

Landmarks Commission
Meeting of October 7, 2024
Agenda #2 and #3, Legistar #85180 and #84154

The staff report for agenda item #3 states: "Previous lot reconfigurations of landmark sites did not also include an amendment to the landmark nomination to reflect a boundary adjustment, which has resulted in challenges in correctly administering the preservation ordinance."

Certainly the Council Crest new construction was a challenge. But Landmarks specifically decided to retain the two lots as part of the landmark site. The adopted motion, Legistar 72243, stated: "retaining the landmark designation on the western lot will ensure preservation of the historic structure on the eastern lot by allowing for review of potential adverse impacts of the new construction on the historic structure."

Ensuring preservation of the historic structure is one of the purposes of the Historic Preservation ordinance: "Accomplish the identification, protection, promotion, preservation, conservation and use of the City's historic resources ..." Thus, looking at the potential risks to the Wiedenbeck-Dobelin Warehouse under this proposed boundary change is important.

1. The boundary change will require a new application for a National Register listing. (36 CFR §60.14(a)(1): A boundary alteration shall be considered as a new property nomination. All forms, criteria and procedures used in nominating a property to the National Register must be used.)

Will the Wiedenbeck-Dobelin Warehouse be able to obtain a new National Register listing with the proposed boundaries? Historical integrity is required.

Integrity is the ability of a property to convey its significance. The evaluation of integrity is sometimes a subjective judgment, but it is always grounded in an understanding of a property's physical features and how they relate to its significance.

Integrity is conveyed through a place's location, setting, design, materials, workmanship, feeling, and association. Through a combination of these aspects of integrity, we can better understand a place.

https://www.nps.gov/subjects/nationalregister/upload/Info-sheet-NR-integrity-2024-05-02_508.pdf

If the warehouse is not approved for a new Federal Register listing, substantial federal tax credits will be lost for any future rehabilitation.

As a side note, it is interesting that the applicant's paid consultant, Heritage Consulting Group, entirely skipped over the "spatial relationships" requirement. (Item #9, pdf page 11 of the application).

2. If the proposed boundary is approved, Landmarks would no longer have control as to what is built on the rest of the currently landmarked lot. Rather than having control, Landmarks' opinion would merely be advisory to Plan Commission.

3. If a split in the ownership of the two lots is desired at some point in the future, how marketable would the warehouse be with an irregular lot that only has 10-11 foot setbacks on the westerly sides?
4. The application speaks to shared spaces, e.g.: "By building a new project next door with shared common area spaces indoor and outdoor the Wiedenbeck rental units are enhanced from their existing arrangement." What is not clear whether this arrangement is just for the present or is permanent (i.e., an easement). And, should the landmark be separately sold, there would likely be issues with landmark residents having access to the interior spaces of the new construction.
5. The 1915 addition at the back of the original warehouse will not be visible to the public except for a peek at the corner through the U-Haul parking lot. And, someday, when the U-Haul property is redeveloped, it can be redeveloped with a 5 foot side yard setback, which would result in the only publically visible portion of the resource being the 40 foot wide front façade and, perhaps, a slice of the easterly side façade. One could argue that the public cannot see the back building at this point in time which, through true, is not a reason to continue to hide a landmarked building.

The staff report also states: "When the preservation ordinance was updated in 2015, it included a new provision to amend landmark nominations to address new information when it became available and to provide for boundary adjustments. To date, no landmark nomination has proceeded through the amendment process."

While the ordinance change did not specifically address boundary adjustments, such changes can come within amending a landmark designation. A question to ask is how a decision on this particular lot will affect other landmark sites where a lot split has occurred. No particular reason is provided for why the landmark boundary needs to be changed for this landmark site, particularly when changes have not been made for other landmark sites. Will this result in boundary changes for those other landmark sites? Is having an advisory capacity better than having control?

Respectfully Submitted,
Linda Lehnertz