

Bailey, Heather

From: Bailey, Heather
Sent: Tuesday, November 11, 2025 2:03 PM
To: 'Kurt Stege'
Subject: RE: Most recent "Housing Forward" proposal as it relates to historic preservation

Kurt,

I think that you and I have very different definitions of what “historic preservation” means. In our ordinance you’ll find the following definitions:

Historic District means an area designated by the Common Council pursuant to Subchapter G of this ordinance. Historic Resource means any building, structure, sign, feature, improvement, site, or area having significant architectural, archaeological, anthropological, historical, or cultural value. Historic Resources include properties designated as landmarks or historic resources in this chapter. (Am. by [ORD-22-00042](#), 6-4-22)

And changes in zoning and land use do not prevent historic preservation. Please see Mansion Hill where buildings that were once large single-family homes are now multi-unit buildings. That is typical historic preservation. The Secretary of the Interior’s Standards for Rehabilitation say “**Rehabilitation** is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.” People adding ADUs or modifying their single-family residence to become a two or three unit building to their National Register-listed property does not destroy its historic value. In fact, those changes are eligible for Federal Preservation and State Preservation Tax Credits. I wish those property owners well in making use of those incentives to introduce gentle density into these established neighborhoods.

And the Landmarks Commission agreed when they discussed the creation of the TOD Overlay in 2022:

Legistar [75070](#)

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Historic preservation is not a tool for exclusionary zoning or to prevent density. Our standards are about how these properties evolve to accommodate new and ongoing uses. If we want to conserve the historic and architectural design of a property or neighborhood, then we do that through local historic designation. But that architectural design review will not prevent density or prevent rezoning. As former Alder Furman said at the 2022 meeting, historic character does not equate to density.



Heather L. Bailey, Ph.D. *(she/her)*

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From: Kurt Stege <kurt.stege@gmail.com>

Sent: Tuesday, November 11, 2025 12:54 PM

To: Bailey, Heather <HBailey@cityofmadison.com>

Subject: Re: Most recent "Housing Forward" proposal as it relates to historic preservation

I am unconvinced that the use of "historic preservation" in Sec. 33.19(2)(h) is somehow limited to local landmarks and local historic districts, and that the Landmarks Commission is precluded from offering a "historic preservation" perspective on proposed city ordinances that would make wholesale changes to the zoning for properties in National Register Historic Districts.

I am unaware of anything in the Madison ordinances that would narrow the term "historic preservation" to exclude properties beyond local designations. Certainly the scope of the Madison Historic Preservation Plan extends beyond properties that already have a local designation. Area plans encompass properties of historic interest that are not already locally designated. These instances argue against a narrow reading of historic preservation. I would think that during the long history of the Madison Landmarks Commission, its focus has strayed beyond already designated local landmarks and local historic districts.

In addition, Sec. 44.31, Wis. Stats., includes two definitions that support a more expansive reading of "historic preservation":

(2) "Historic preservation" means the research, protection, restoration and rehabilitation of historic properties.

(3) "Historic property" means any building, structure, object, district, area or site, whether on or beneath the surface of land or water, that is significant in the history, prehistory, architecture, archaeology or culture of this state, its rural and urban communities or the nation.

Which entity, other than the Landmarks Commission, is responsible for ensuring that the City is not constraining its interest in protecting historic properties?

Kurt
(608)772-7614

On Tue, Nov 11, 2025 at 9:35 AM Bailey, Heather <HBailey@cityofmadison.com> wrote:

Kurt,

I don't think that this should have been referred to the Landmarks Commission. The LC does not regulate National Register neighborhoods. If we as a City want to ensure preservation of these areas, then they must have a local historic designation.

There's nothing in this text amendment that will change how the historic preservation ordinance completes design review. Historic preservation is the story of adaptive reuse. Allowing for greater density in areas is not contrary to historic preservation. There is not an inherent conflict here. The Landmarks Commission does not weigh in to the change of use to a property. We only regulate and comment on how a property physically evolves so that it is able to continue to convey its historic associations.

I think that it is erroneous to pit historic preservation against affordable housing and increased density. It's a false narrative.



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From: Kurt Stege <kurt.stege@gmail.com>

Sent: Sunday, November 9, 2025 8:58 PM

To: Bailey, Heather <HBailey@cityofmadison.com>

Subject: Most recent "Housing Forward" proposal as it relates to historic preservation

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My reading of the action by the Common Council on October 28 is that they referred the proposed ordinance in Legistar file 90552 to both the Housing Policy Committee and to the Plan Commission, but not to the Landmarks Commission.

In light of the language in Sec. 33.19(2)(h), MGO, and the potential consequences for "historic preservation" (including consequences for National Register properties and districts) if the proposed ordinance is adopted, shouldn't the Commission carry out such a review?

Kurt

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