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**Subject:** Oppose Agenda item 5 - Legistar 88916  
**Date:** Friday, February 13, 2026 12:14:34 PM

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Feb. 12, 2026

Urban Design Commission members,

Please oppose Agenda item 5, Legistar 88916. The Annex Group's revised project plan does not adequately address the referral document's items 3 and 7.

Thank you.

Don Lindsay

#### INTRODUCTION

The Annex Group has proposed a 241 unit housing project at 2150 Commercial Avenue, which is at the corner of Commercial Avenue and Packers Avenue. The name of the project is Central at the Forge Affordable Housing. On Dec. 3, 2024, the UDC referred approval of the Annex Group's plans to a later meeting. The referral mentions nine issues to be resolved before approval [1].

This message will focus on two of those issues:

"\* The applicant shall provide additional design details related to the landscape, amenities and programming in the open spaces/courtyards." [1]

...

"\* The Commission encourages the applicant to continue to explore an at-grade pedestrian connection or other ways to provide further separation/distinction between the buildings and to break down the overall perceived mass and scale." [1]

A third issue, residual toxic contamination at the site, has important design implications.

On January 16, 2026, the Annex Group released a revised set of project plans. The UDC will vote on the revised project plans on Wednesday February 18, 2026.

#### THE CORNER OF COMMERCIAL AND PACKERS AVENUES

"\* The applicant shall provide additional design details related to the landscape, amenities and programming in the open spaces/courtyards." [1]

Annex Group has responded,

"1. a. The Landscape Plan has been updated to incorporate more perennial plantings and shrubs throughout the development.

1. b. The building was moved north approximately 7'-0" to allow more activation at this southern intersection of Commercial, Packers and Oscar Ave to align with the Oscar Mayer Special Area Plan. Plantings and an elevated interactive public space have been incorporated into the surrounding experience. [2; p. 2 of 6 ~ 6 of 90]

"3. a. The landscaping has been increased in these areas. See 3D renderings for additional programming in the open spaces." [2; p. 2 of 6 ~ 6 of 90]

The Annex Group's project plans include an illustration from the Oscar Mayer Special Area Plan. [2; p. 5 of 6 ~ 9 of 90] The picture shows what the corner of Commercial and Packers Avenues might look like. In this artist's concept, the buildings are smaller than those in the proposed plan and there is more open space around them. The Oscar Mayer Special Area plan is also quoted in the Annex Group's project plan,

"Urban Design Recommendations – (F) Commercial Ave Corridor

" 2 – Create a signature multi-use urban gathering place that fronts Commercial Ave and activates building 20, supports daily activities and events.

" 5 – Ensure all development fronting the Packers/Commercial intersection addresses the corner with active entries, architectural features, urban space and ample pedestrian amenities to redefine the intersection identity and improved pedestrian safety." [1; p, 5 of 6 ~ 9 of 90]

The project plan document left out the Oscar Mayer Special Area Plan's recommendation F. 1:

"1. Orient development to Commercial Avenue with entries, active retail and service uses on the ground floor to create a pedestrian scale and incorporate stepbacks to reduce building mass." [3; p. 41 of 61]

The proposed plan does not "incorporate stepbacks to reduce building mass." [2; A201; p. 49 of 90]

The revised plan does not "Create a signature multi-use urban gathering place that fronts Commercial Ave and activates building 20, supports daily activities and events" as the Oscar Mayer Special Area calls for. On Commercial Avenue, the distance from the sidewalk to the wall of the five story building is only 24 feet. [1; C 303 on p. 27 of 90] The ten foot area nearest the building is elevated and separated by a four foot wide barrier from the ten feet nearest the sidewalk. It seems that the ten foot area nearest the building is intended for customers of the

retail stores. A strip just ten feet wide is available for the public gathering place. There is little room for benches, tables, or pavilions that public gatherings would need.

Illustrations A956 and A957 [2; pp. 57 - 57 of 90] show a plot on the project's land with lawn and flowers. This area is right on Packers Avenue, a six lane divided highway that carries thousands of cars, trucks, and buses. Noise from the highway will echo off the walls of the five story building. This open space should be moved around the corner of the apartment building.

The corner of Commercial and Packers Avenues is a gateway to the Oscar Mayer Special Area. The proposed project plan produces an uninviting entrance.

#### SEPARATION/DISTINCTION BETWEEN BUILDINGS

The building in the proposed project plan creates an 800 foot long, five story tall wall along Packers Ave. Development of this 4.248 acre [4; p. 8] site should complement rather than conceal the 50 acres behind the proposed apartment building. Potential retail businesses will be discouraged from locating on the 50 acre site if their stores are not visible from a high traffic road like Packers Avenue.

"\* The Commission encourages the applicant to continue to explore an at-grade pedestrian connection or other ways to provide further separation/distinction between the buildings and to break down the overall perceived mass and scale." [1]

The Annex Group responded,

"a. The at-grade pedestrian connection through our private site was looked at in great depth. As we studied the site and the Oscar Mayer Special Area Plan (OMSAP) we felt that the areas needing the most pedestrian friendly experiences were at the intersection of Oscar, Commercial and Packers Ave. on the south side of the site as well as the intersection of Packers, Coolidge and Oscar Ave. on the north side of the site. Packers is such a busy 6 lane highway that if we encouraged pedestrian traffic through the middle of our site, it would also encourage jaywalking across Packers Ave at locations other than those two prominent intersections.

"b. The diagram below illustrates the pedestrian circulation around our site including urban public spaces, activated ground-floor uses and our proposed outdoor gathering areas. At this time, there is no singular destination intended to draw pedestrians through the site."

"c. Residents can enter the building in the middle of the site on the east side and pass through to the west side. Allowing the public to pass through a narrow opening between buildings wouldn't be safe. This dark hidden path could encourage homeless people or criminals to loiter.

"d. A narrow opening between two five story buildings wouldn't allow for a very well-established garden due to limited sun exposure.

"e. This five-story structure of varying heights has been separated into three different buildings visually by using different colored materials, recessing certain areas, and providing courtyards and walk-up units.

"f. This WHEDA project isn't financially feasible if there needs to be multiple buildings." [2; p. 3 of 6 ~ 7 of 90]

The jaywalking problem mentioned in point "a" could be easily solved by a fence in the median of Packers Ave.

The Annex Group's reply repeatedly mentions a narrow opening between the buildings. Visually breaking up the monolithic, 800 foot long building, means that openings totalling about 25% would be needed. 25% of 800 feet totals 200 feet of open space. Even a gap of only 10% would be 80 feet wide. Concerns about a narrow gap are misplaced.

The Annex Group complains that "This WHEDA project isn't financially feasible if there needs to be multiple buildings." [2; p. 3 of 6 ~ 7 of 90] This complaint is another way of saying that the Annex Group paid too much for the land. The Oscar Mayer area is full of smaller scale housing because developers once knew better than to overpay for land.

#### CONTAMINATED SOIL AND WATER

The UDC referral did not mention toxic contamination on the site. The Wisconsin DNR knows that this site is contaminated [5]. The Wisconsin DNR closed its investigation of the site, but there are continuing obligations:

"The continuing obligations for this site are summarized below. Further details on actions required are found in the section Closure Conditions.

"Groundwater contamination is present at or above ch. NR 140, Wis. Adm. Code enforcement standards.

"Residual soil contamination exists that must be properly managed should it be excavated or removed.

"Pavement, an engineered cover or a soil cover must be maintained over contaminated soil and the DNR must be notified and approve any changes to this barrier.

"Remaining contamination could result in vapor intrusion if future construction activities occur. Future construction includes expansion or partial removal of current buildings as well as construction of new buildings. Vapor control technologies will be required for occupied buildings, unless the property owner assesses the potential for vapor intrusion and the DNR agrees that vapor control technologies are not needed." [6; pp. 1 - 2]

The project plans show no provisions for dealing with the site's toxic contamination. A place for vapor control technologies might be needed. Soil vapor extraction equipment is not very large, but it must be carefully placed and vented to keep fumes out of inhabited spaces. Special landscaping might be needed to cap the residual contamination. The site is currently completely paved in order to cap contaminated soil and prevent direct human contact with toxic chemicals. Access to monitoring wells might be needed. No project plans should be approved until thorough testing allows the Wisconsin DNR to determine what soil and water remediation is required.

## CONCLUSION

The Annex Group has taken some measures in response to the issues raised in the UDC's referral document, but they do not go far enough. The corner of Commercial and Packers Avenues needs more open space and amenities for public gatherings. The apartment building needs to be redesigned so that it complements rather than conceals development on the 50 acres behind it. No plan is complete without provisions for dealing with residual toxic contamination on the site.

Thank you for considering this comment.

Don Lindsay

## SOURCES

[1] UDC Referral

20260202

<https://madison.legistar.com/LegislationDetail.aspx?ID=7451268&GUID=4A4F9D79-6A0A-4804-8FCC-C5A7E424509C&Options=ID%7CText%7C&Search=2150+Commercial>

then click on Action details of meeting 12/3/2025

Accessed 20260203

[2] Project Plans 1/16/2026

<https://madison.legistar.com/View.ashx?M=F&ID=15180353&GUID=6DCF8FEC-39E0-4C4D-B0B7-4D421A8F6457>

Accessed 20260211

[3] Oscar Mayer Special Area Plan

<https://www.cityofmadison.com/dpced/planning/documents/OscarMayerSpecialAreaPlan.pdf>

[4] Certified Survey Map

<https://madison.legistar.com/View.ashx?M=F&ID=14922890&GUID=260EE6DA-E94C-480C-BE3C-CC54FC7E4AFC>

Accessed 20251121

[5] Site Closure with Obligations

<https://apps.dnr.wi.gov/rrbotw/download-document?docSeqNo=190613&sender=activity>

Accessed 20251126

[6] Site Closure

<https://apps.dnr.wi.gov/rrbotw/download-document?docSeqNo=188217&sender=activity>

Accessed 20251126