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**Subject:** Public comment on 3205 Stevens Street, Legistar ID No. 90615, agenda item no. 7, December 17, 2025  
**Date:** Wednesday, December 17, 2025 4:39:15 PM  
**Attachments:** [251217 LEGISTAR90615 MEMORANDUM UDC V2.pdf](#)

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Dear Commissioners,

The attached memorandum details why the Woodland Reserve expansion at 3205 Stevens Street (Item 7) fails to meet multiple Urban Design Commission standards. The applicant proposes to shoehorn four new buildings into the remaining open spaces of a 60-year-old apartment complex—a piecemeal approach that cannot achieve "the highest quality of design" or create "an environment of sustained aesthetic desirability." Your standards require that you look at the big picture, not just building-by-building details. I respectfully urge the Commission to recommend that this application not be approved in its current form and that the applicant develop a comprehensive master plan worthy of this exceptional site.

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A handwritten signature in dark ink, appearing to be the letter 'A' with a stylized flourish extending to the right.

Alex Saloutos

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# M E M O R A N D U M

**Date:** December 17, 2025

**To:** Urban Design Commission

**From:** Alex Saloutos

**Re:** **3205 Stevens Street, Woodland Reserve Expansion, Legistar ID No. 90615, Agenda Item No. 7, December 17, 2025**

This memorandum constitutes my public comments on the conditional use application for Woodland Reserve Apartments, 3205 Stevens Street (Legistar ID 90615),<sup>1</sup> which is Item 7 on the agenda for today's Urban Design Commission meeting, December 17, 2025. These comments are submitted for the Commission's review and advisory recommendation to the Plan Commission.

## SUMMARY

This application fails to meet multiple Urban Design Commission standards, which require the Commission to recommend that the applicant pursue a comprehensive master-planned approach to meet or exceed them. The 8.41-acre site is designated Medium Density Residential in the Generalized Future Land Use Plan, which contemplates 20 to 90 dwelling units per acre. Instead of comprehensive redevelopment, the applicant proposes to shoehorn four new buildings into the remaining open spaces of a 60-year-old apartment complex, achieving a nominal density of just 22.7 DU/acre while perpetuating the asphalt-dominated site plan of the original 1965 development.

As a result, this piecemeal approach fails to meet the following standards:

- "To assure the highest quality of design for all public and private projects in the City."
- "To protect and to improve the general appearance of all buildings, structures, landscaping and open areas in the City."
- "To encourage the protection of economic values and proper use of properties."
- "To encourage and promote a high quality in the design of new buildings, developments, remodeling and additions so as to maintain and improve the established standards of property values."
- "In all other ways possible assure a functionally efficient and visually attractive City in the future."
- "[C]reates an environment of sustained aesthetic desirability compatible with the existing or intended character of the area" (MGO 28.183(6)(a)8).

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<sup>1</sup>Legistar ID 90615, Application Materials and Staff Report, City of Madison.  
<https://madison.legistar.com/LegislationDetail.aspx?ID=7133178>

## THE COMMISSION'S SCOPE AND STANDARDS

The Urban Design Commission's standards not only allow, but require, the Commission to look at the big picture. Before addressing the specifics of this application, it is worth recalling the Commission's purpose and the standards it is charged to uphold. MGO 33.24(2) declares:<sup>2</sup>

*It is hereby declared a matter of public policy that the design, appearance, beauty and aesthetics of all public and private buildings, structures, landscaping and open areas are a matter of public concern and as such must be controlled so as to promote the general welfare of the community.*

The ordinance establishes the Commission's purpose as:

- "To assure the *highest* quality of design for all public and private projects in the City"—not merely adequate or better design, but the highest quality.
- "To protect and to improve the general appearance of all buildings, structures, landscaping and open areas"—with particular attention to how individual projects contribute to the larger urban fabric.
- "To encourage the protection of economic values and *proper use* of properties"—which I interpret to mean the highest and best use of a site's potential.
- "To encourage and promote a high quality in the design of new buildings, developments, remodeling and additions so as to maintain and improve the established standards of property values."
- "To foster civic pride in the beauty and nobler assets of the City, and in all other ways possible assure a *functionally efficient* and visually attractive City in the future."

With respect to residential building complexes specifically, MGO 33.24(4)(c) charges the Commission to "review the exterior design and appearance of all principal buildings or structures and the landscape plans of all proposed residential building complexes" and report findings and recommendations to the Plan Commission.

These standards establish an aspirational mandate. The Commission is not simply asked whether a proposal is acceptable; it is asked whether it achieves the highest quality, protects and improves the urban environment, and assures a functionally efficient and visually attractive city—the proposal before you must be evaluated against these standards. As detailed throughout this memorandum, the current proposal falls short of these standards—it does not represent "the highest quality of design," it does not encourage "proper use" of this exceptional property, and it does not "assure a functionally efficient" outcome for this site.

The current proposal and staff analysis evaluate the project at a granular level—building materials, dimensional standards, and individual site relationships- but do not address the overall project design against the Commission's standards. This approach deflects the discussion from what should be addressed first. Whether inserting new buildings into remaining open spaces around 60-year-old

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<sup>2</sup>Madison General Ordinances, Section 33.24, Urban Design Commission.  
[https://library.municode.com/wi/madison/codes/code\\_of\\_ordinances](https://library.municode.com/wi/madison/codes/code_of_ordinances)

structures can ever achieve “the highest quality of design,” create “an environment of sustained aesthetic desirability,” or “assure a functionally efficient and visually attractive City in the future.”

### **AN UNPRECEDENTED REDEVELOPMENT OPPORTUNITY**

The subject site presents a unique opportunity due to its size and prime location. At 8.41 acres, it is one of the largest redevelopment parcels on Madison’s near west side. It is located 1.2 miles from UW Hospital and 3.4 miles from the Capitol Square. It is on a bus line and blocks from the BRT. Most significantly, the site is straddled by two large, heavily wooded city parks: Quarry Park (16.89 acres) to the north and Hoyt Park (22.63 acres) to the south.

This combination of size, urban location, and natural setting constitutes an unprecedented redevelopment opportunity. How the Urban Design Commission guides the development of this site will determine its character for the next 50 years or more. The Commission’s standards require evaluating this project at a high level, not just the details of individual buildings, to determine whether the proposal realizes the site’s potential.

### **THE PROBLEM: SHOEHORNING NEW BUILDINGS INTO AN OUTDATED SITE PLAN**

The applicant proposes shoehorning four new buildings into a low-density residential complex built in 1965. The new buildings will occupy spaces where open areas or outbuildings previously stood. Consistent with planning practices of that era, the existing complex features extensive surface parking, private drives, and impervious surface—conditions that the proposed infill does nothing to address.

The existing complex has 129 units, for a density of 15.4 dwelling units per acre. The applicant calculates the post-development density at 22.7 DU/acre.<sup>3</sup> However, the Comprehensive Plan’s designation of Medium Residential contemplates 20 to 90 dwelling units per acre. The proposed 22.7 DU/acre represents a nominal increase that barely crosses into the Medium Residential range while perpetuating the site’s fundamental design deficiencies. A density of at least mid-range, approximately 55 dwelling units per acre, would be required to represent the “proper use” of this property and meet the Commission’s standards.

The Comprehensive Plan describes Medium Residential areas as follows:

*Medium Residential (MR) areas may include a variety of relatively intense housing types, including rowhouses, small multifamily buildings, and large multifamily buildings... MR areas should be interconnected with surrounding development as part of a complete neighborhood, and should be transit-oriented... Special attention must be paid to design within MR areas where the use adjoins less intense residential development—architectural features such as a step back may be needed to transition MR development to less intense surrounding development.*

The proposed design does not reflect these aspirations and, therefore, is not a “proper use” of the site. There are vast expanses of asphalt, and more than half of the units overlook surface parking. The design does nothing to address the flaws of the 1960s-era site plan. Ground-floor units will face

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<sup>3</sup>City of Madison Comprehensive Plan, Generalized Future Land Use Categories.

existing parking lots, service drives, and the backs of older buildings rather than the thoughtfully designed courtyards and landscaped buffers that comprehensive site planning enables.

### **DESIGN INCOHERENCE: THE INEVITABLE RESULT OF PIECEMEAL INFILL**

Critically, the application includes no renderings showing multiple buildings from the original phase alongside the proposed new buildings. Without such renderings, the Commission cannot evaluate how contemporary structures will appear in the context of the existing 1965 buildings. All we can determine from the submitted materials is the quality of the new buildings' design in isolation. Evaluating how they will relate to the current built environment is pure conjecture.

The existing 2-story mansard-roof buildings in red and cream brick represent a coherent, if dated, architectural vocabulary. The proposed new buildings, 4-story contemporary structures with buff masonry, dark brown metal siding, and grey horizontal siding, represent a different era, different materials, and a different design philosophy.

The resulting complex will exhibit:

- **Material discontinuity:** Warm red/cream brick alongside buff masonry and grey siding—a juxtaposition that will persist for 40-50 years.
- **Height discontinuity:** Existing 2-story buildings (25-30 feet) are interspersed with 4-story buildings at 48 feet, creating an unpredictable visual rhythm.
- **Architectural vocabulary discontinuity:** Mansard roofs alongside pitched contemporary roofs; 1960s proportions alongside 2020s massing.
- **Foreclosed future:** Once constructed, the site plan is effectively locked in, with comprehensive redevelopment geometrically and financially constrained for decades.

The question for the Commission is whether this patchwork—two incomplete developments sharing a site—constitutes “an environment of sustained aesthetic desirability” as required by MGO 28.183(6)(a)8.

### **APPLICATION DEFICIENCIES**

The application lacks information necessary for the Commission to evaluate the proposal:

- **No combined renderings:** No renderings or elevations show both the old and new buildings together. Without these, the Commission cannot visualize how the disparate architectural vocabularies will relate. I would consider the application incomplete without such renderings.
- **No impervious surface data:** Despite the extensive surface parking, driveways, and private roads, the application provides no information on the total impervious surface area of these.
- **No shadow study:** MGO 28.183(6)(a)11 requires consideration of shadows for excess height. No shadow analysis has been provided for the 48-foot buildings.

## THE ALTERNATIVE: PHASED COMPREHENSIVE REDEVELOPMENT

Professional planning literature documents an alternative model: phased redevelopment of aging residential complexes that achieves design coherence while maintaining housing continuity. Urban Land Institute case studies—including Regent Park (Toronto), Mariposa District (Denver), and Encore (Tampa)—demonstrate that this approach is feasible and produces superior outcomes.<sup>4</sup>

Key principles from these case studies include:

- **Master plan first:** Comprehensive design standards established before construction begins.
- **Phased replacement:** Existing buildings systematically replaced rather than supplemented with infill.
- **Resident continuity:** Residents relocate within the development with guaranteed right of return.
- **Integrated infrastructure:** Streets, stormwater, and pedestrian connections redesigned comprehensively.
- **Parking below grade:** Common practice now places parking on a level underneath housing, amenities, and green space—enabling full-size trees and quality outdoor environments.

## SECONDARY ISSUES

While the fundamental project concept is the primary concern, several secondary issues warrant the Commission's attention:

### Pedestrian Pathway Removal

The application proposes to remove the southern half of the north-south path connecting Bluff Street and Stevens Street—and by extension, Hoyt Park and Quarry Park. This is the most-used path by the general public, providing a direct pedestrian connection between two major parks. The proposed replacement is a circuitous route through the development that approximately doubles the walking distance.

Ken Raffa, past president of the Sunset Village Community Association (the neighborhood association where the project is located), stated: "It doubles the length and would discourage me from using it."<sup>5</sup>

The circuitous nature of the proposed path and its routing through the housing complex will negatively impact the public's willingness to use it. Users will feel they are walking through private property rather than a publicly accessible connecting path. Approximately 25 public comments on this application express concern about the pathway elimination.

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<sup>4</sup>Urban Land Institute Case Studies: Regent Park (Toronto), Mariposa District (Denver), Encore (Tampa). <https://casestudies.uli.org/>

<sup>5</sup>Ken Raffa, Past President, Sunset Village Community Association, public comment on Legistar 90615.

## HEIGHT TRANSITIONS

The Comprehensive Plan requires “special attention” where Medium Residential development adjoins less intense residential development. While Buildings 4 and 5 (2-story carriage houses) are positioned adjacent to single-family homes on McKinley Street, no transition analysis addresses the relationship between the 4-story Buildings 1 and 2 and the adjacent properties or the existing 2-story structures within the complex.

## RECOMMENDATIONS

This memorandum respectfully requests that the Commission’s advisory comments acknowledge the following ways the proposal fails to meet the Commission’s standards:

1. **Fails to assure “the highest quality of design”:** Piecemeal infill that perpetuates a 60-year-old asphalt-dominated site plan does not represent the highest quality of design for this exceptional site.
2. **Fails to “protect and to improve the general appearance of all buildings, structures, landscaping and open areas”:** The proposal inserts contemporary buildings into a dated context without addressing the site’s existing design deficiencies, resulting in visual discontinuity rather than improvement.
3. **Fails to encourage “proper use of properties”:** The proposal achieves only 22.7 DU/acre on a site designated for 20-90 DU/acre, representing a nominal increase rather than the proper use of this prime urban location.
4. **Fails to “maintain and improve the established standards of property values”:** The mixing of incompatible architectural vocabularies, materials, and scales will create enduring visual dissonance that does not improve property value standards.
5. **Fails to “assure a functionally efficient and visually attractive City in the future”:** The site plan locks in 1965-era inefficiencies for another 50 years, foreclosing comprehensive redevelopment that could achieve a functionally efficient layout.
6. **Fails to create “an environment of sustained aesthetic desirability”:** The juxtaposition of 2-story mansard-roof buildings with 4-story contemporary structures, mixing red/cream brick with buff masonry and grey siding, will not sustain aesthetic desirability over the 40-50 year lifespan of the new buildings.
7. **Fails to demonstrate compatibility with “the intended character of the area”:** The Comprehensive Plan’s Medium Residential designation envisions interconnected, transit-oriented development at 20-90 DU/acre. This proposal does not reflect the intended character.

Based on these deficiencies, this memorandum recommends:

- The Commission recommends to the Plan Commission that this application not be approved in its current form and that the applicant be directed to develop a comprehensive master plan for the site that meets the Commission’s standards. The UDC recognizes that the applicant has invested significant time and resources in the current proposal. Still, the decisions made

today will shape this site for the next 50 years or more and are necessary to meet or exceed the relevant city ordinance standards.

- If the Commission recommends the current development plan, consideration should be deferred until the applicant provides: (a) renderings showing old and new buildings together; (b) shadow studies for the 48-foot buildings; (c) impervious surface calculations; and (d) a detailed pedestrian connectivity analysis.

### **CONCLUSION**

This site deserves better than piecemeal infill that locks in a 60-year-old site plan for another half-century. The Commission has the opportunity—and the mandate—to encourage design excellence commensurate with this site's unique potential. The standards call for the highest quality, civic pride, and a visually attractive city. This proposal does not meet those standards.

I appreciate your consideration of these comments.



### FACT VERIFICATION

The following table documents key facts cited in this memorandum and their sources:

Fact	Value	Source
Site acreage	8.41 acres	Letter of Intent
Existing units	129 units	Letter of Intent
Proposed new units	62 units (5 buildings)	Letter of Intent
Existing density	15.4 DU/acre	Calculated
Proposed density	22.7 DU/acre	Letter of Intent
Medium Residential density range	20-90 DU/acre	Comprehensive Plan
Year original buildings constructed	1965	Staff Report
Proposed building height	48'-2"	Letter of Intent
Lot coverage	49%	Application materials
Surface parking stalls	171	Application materials
Quarry Park acreage	16.89 acres	City of Madison Parks
Hoyt Park acreage	22.63 acres	City of Madison Parks
Distance to UW Hospital	1.2 miles	Measured (approximate)
Distance to Capitol Square	3.4 miles	Measured (approximate)