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**Planning Division**

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**DATE:** April 28, 2011  
**TO:** Jeanne Hoffman, Facilities and Sustainability Manager  
**CC:** Madison Plan Commission  
**FROM:** Michael Waidelich, Principal Planner  
**SUBJECT:** Comments on Draft Sustainability Plan

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Several members of the Planning Division staff have had an opportunity to review the draft Madison Sustainability Plan recently introduced to the Common Council for adoption. This memorandum presents the merged comments compiled from the reviewing staff.

### **General Comments**

- As the Sustainability Plan staff team has also noted, the plan is very wide in scope and probably includes too many goals and actions. Many of its policies, recommendations and initiatives are currently underway and well-covered in other planning documents, and it may be counter-productive to have so many action recommendations made outside of other relevant plans that address the same issues. Coordinating and integrating all these recommendations into the appropriate other plans will be a major undertaking.

Reducing the number of goals and actions and prioritizing them would make it more likely that adequate resources can be dedicated to implement the recommendations, and would also help communicate the plan to the public and help them better understand the plan and participate in achieving its goals. Including more information about the City's existing sustainability policies and efforts, and some of its successes, would provide added perspective and facilitate setting priorities for recommended additional actions.

- There is overlap and duplication within the Sustainability Plan itself. Very similar recommendations are often made under several different Sustainability Categories. This makes it more difficult to discern the number of discrete recommendations, or to place responsibility for advancing the recommendations with specific lead agencies or partners. Reducing this duplication could be addressed as part of reducing the overall number of goals and recommended actions.
- Some agencies are listed as having lead or partner responsibility in a great many of the recommended actions. While consideration of creating additional staff positions is suggested for several specific identified tasks, the potential amount of staff work that some of the recommended actions would require is significant, and the resources available to produce this additional work will almost certainly be limited. Setting real priorities will be essential to effective implementation.

- Within almost every Sustainability Category, the plan recommends creating and maintaining a wide array of new data bases, baselines, indexes, monitoring procedures, ranking systems, matrices, etc., often with an associated need to identify and develop appropriate methodologies. Creating and maintaining these new systems will require significant staff time and resources. As noted above, resources are likely to be limited and it may be necessary to prioritize which of these recommended data systems are most essential and will have the most real impact on the City’s ability to achieve the recommended goals.
- Throughout the plan, there are multiple references in the recommended actions to “creating incentives,” usually without indicating what types of incentive may be intended (are they public financial incentives, for example). Because incentives are mentioned so frequently, it would be helpful to be more specific about this.

### **Specific Comments**

Many reviewer comments noted proposed goals that were already established City policy and recommended actions that were already underway, as well as the duplication within the plan. Questions were also raised regarding the precise meaning and intent of some of the plan’s recommended goals and actions. The general comments above point out overall concerns about the plan, and these are repeated in the following comments regarding specific recommendations only in cases where it seemed particularly useful. The comments are referenced to the corresponding page and/or goal number in the draft plan.

### **Natural Systems**

#### ***P. 10 Goal 3: Improve Surface Water Quality.***

##### ***Meet the NR 151 and Dane County Chapter 14 Standards***

The goal to meet NR 151 and Dane County Chapter 14 standards seems to contradict the recommendation under **Goal 7** to develop more stringent standards.

#### ***P. 11 Goal 4: Increase Water Conservation.***

The action item to investigate and implement use of grey water systems should recommend exploring Building Code and public health policies and ordinances for initial changes. Zoning has relatively little to do with implementing grey water systems.

#### ***P. 12 Goal 5: Prevent solid waste from entering landfill[s].***

Composting is already permitted in residential zoning districts. Is the action item to develop guidelines to permit well-managed home composting in subdivisions and condominium plats meant to suggest the *promotion* of well-managed composting?

#### ***P. 13 Goal 6: Restore and maintain natural habitat.***

The intent of the action item to redesign streetscapes and other built areas to incorporate non-traditional green space to create more open space seems unclear. Some examples of what is intended would be useful.

**P. 14 Goal 7: *Improve stormwater management.***

***Develop more stringent requirements than those outlined by NR 151 and Dane County Chapter 14 standards.***

This goal should be cast in terms of desired outcomes regarding water quality, water usage and supply, etc., not in terms of creating more stringent requirements. This is more of an action item.

**Planning & Design**

In general, this section of the Sustainability Plan seems to cover several fairly distinct policy areas--- transportation, land use, buildings and infrastructure, and local food systems--- united primarily by the fact that they all involve “planning.” It might be useful to consider moving at least the pure transportation goals and actions (for example, operational recommendations such as “provide additional bus trip planning resources”) into the Transportation section (which currently focuses mostly on alternative transportation), and focus this section more on land use and physical development issues--- which include integrating land use and transportation planning.

**P. 16 Goal 1: *Improve transportation planning.***

The relationship between the Sustainability Plan’s transportation goals and the multiple transportation planning processes, initiatives, and plans that already exist should be clarified.

Several action items under **Goal 1** overlap recommendations in the Transportation section (Sustainability Category) of this plan.

The action item to implement further planning efforts to create efficient transit hubs should reference working with the Dane County Regional Transit Authority and Madison Metro.

The action item to strengthen the “Complete Streets” policy needs to be more specific.

**P. 17 Goal 2: *Foster holistic land use.***

***Ensure that all Madison residents have access to daily needs within ½ mile of [their] residence or within ½ mile of public transit access.***

While this is a laudable goal, it isn’t clear that this level of access is required for sustainability. Many more sustainable societies than ours walk farther than this every day as part of daily life. Having all daily needs within one-half mile is unrealistic even in an urban environment. Being within one-half mile of transit service (that can take you to needed goods and services) is more reasonable, but will be difficult to achieve in edge neighborhoods, particularly in the early stages of development, unless willingness to support low-ridership service increases.

***Reduce sprawl growth by 25 percent by 2015.***

The meaning of this goal is unclear (as are references to sprawl elsewhere in this plan), and because sprawl isn’t defined, it is also unmeasurable. It may or may not be an appropriate or reachable goal, depending on what “sprawl” means.

Many of the recommended actions are already being addressed as part of implementing adopted City plans. Other comments on specific actions:

- ***Create an inventory of undeveloped land parcels... (P. 17)***

Infill and redevelopment of underutilized land parcels is recommended generally in adopted City plans, and recommendations for specific potential redevelopment locations are included in many more-detailed neighborhood and special area plans. Identification of underutilized parcels already occurs as part of these planning activities or through special planning studies, as required.

- ***Implement a Transfer of Development Rights Program within the County. (P. 17)***

It could be argued that a county-wide TDR program would primarily benefit the owners of large properties in the townships at the edges of the city and increase their ability to develop the scattered pockets of exurban sprawl that eventually make orderly urban development more difficult and costly. County-wide TDRs could also create a disincentive to the higher-density urban development that the City wants to encourage in its growth areas by requiring developers to purchase development rights from rural landowners. Recommend that this recommended action be removed from the plan.

- ***Advocate for creation of a metropolitan planning agency... (P. 17)***

It is not clear if this is a transportation planning recommendation or also a land use planning recommendation. If the former, the distinction from the existing Madison Area Transportation Planning Board (MPO) should be clarified. If the latter, Madison experience with county or regional planning oversight is that it hasn't always been especially useful in implementing adopted City plans. The reference to "sprawl" suggests that there may be a predisposition to oppose the orderly urban expansion that has been critical to maintaining Madison's economic and fiscal health. Good regional planning is critical to Madison's success as well as the region's, but creation of a new agency shouldn't be a focus of the effort.

- ***Develop guidelines for developers and committees to follow when creating and reviewing plans to reinvent shopping malls... (P. 17)***

The policies and recommendations included in adopted City plans currently provide adequate guidelines for this type of redevelopment as a general case, and developers and reviewing committees should use those plans in the review. Reinventing a shopping mall will require a detailed plan for the redevelopment site and perhaps a City-adopted special area plan, and those plans can include additional site-specific guidelines for the redevelopment, as required. Development of additional guidelines is not needed at this time.

Note also that shopping "malls" may not be the worst offenders. Old strip centers, highway-commercial corridors, and the "big box" development surrounding the malls may be poorer and less-sustainable land uses.

The Comprehensive Plan recognizes this issue and recommends Neighborhood, Community, and Regional Mixed Use and Transit Oriented Development as the long-term land uses for many locations now characterized by less-sustainable commercial developments.

- ***Grant vacant and derelict properties conditional use for community gardens. (P. 17)***

The new Zoning Code lists community gardens as a permitted use in all zoning districts (except Conservancy, where it is a conditional use). Establishment of more community gardens is constrained by issues related to property owner desires, cost, site management and financial responsibility, the effect on eventual transition to alternative recommended uses, etc., rather than on the need for zoning approvals.

- ***Expand data collection to track sprawl growth annually using various applicable metrics. (P. 17)***

Existing data can track the amount, location and type of annual urban development.

***Pg. 19 Goal 4: Promote and foster local food systems***

***The City of Madison will identify and commit 4 percent [of its] land area, including its own property, to urban agriculture by 2020.***

Four percent of Madison’s current land area is more than three square miles. Committing to this amount of urban agriculture by 2020, or perhaps ever, seems unrealistic. Unless the concept included larger agricultural tracts maintained within the city at the municipal edges, although this might stretch the concept of “urban agriculture.” It would be more effective to focus on increasing the proportion of locally consumed food produced in the surrounding region than on the amount produced within the City limits *per se*.

**Transportation**

The definition of an “alternative transportation system” should be included when this is first mentioned in the first paragraph of the introduction. It becomes clear in subsequent paragraphs from context, but should come earlier. Similarly, references to “alternative transportation plans” should be more specific when the term is first used.

***Pg. 21 Goal 1: Implement existing City, County and regional alternative transportation plans***

**Actions**

- ***Measure mode share objectively throughout [the] city during all seasons.***

This recommendation implies a staff-intensive, time-consuming process of continual monitoring. More information is needed on how this will be done, who will do it, and what meaningful additional benefits will be provided compared to *ad hoc* measurements conducted as needed.

The Dane County Regional Transit Authority and Madison Metro should be included among the Lead Agencies and Partners listed for **Goal 1**, and also for **Goal 2** and **Goal 3**.

***Pg. 22 Goal 2: Expand the number of neighborhoods where sustainable transportation choices enable mobility without a car.***

**Actions**

- ***Create policies and procedures that require all new developments to include a Transportation Demand Management Plan that prioritizes all transportation modes. (P. 22)***

- ***Require events that are granted either a park use or street use permit, and that anticipate attendance over 200 people, have a TDM plan. (P. 22)***

Both of these action recommendations seem excessive. Not every development necessarily has any significant transportation impact. In addition, creating a TDM Plan requires knowing the specific uses that will be included in the development, and working with the owners/managers of those uses to design and implement the plan. At the development stage, the specific users of the project may be undetermined.

In any case, the threshold requiring preparation of a TDM should be established at a level commensurate with the actual potential impacts of the increased transportation demand and/or in consideration of the number of persons that might benefit from wider transportation choices. “All” new developments (or all new uses) seems much too sweeping. Given the complexity of preparing a good TDM, it also seems that the threshold for “one-time” events should be higher than 200 persons--although it may be reasonable to require some level of planning in situations where access limitations or limits on available parking at the event venue suggest that it is warranted.

***Pg. 24 Goal 4: Establish uniform, consistent evaluation methods for understanding sustainable transportation usage and goal achievement.***

**Actions**

- ***Create a city-wide transportation evaluation plan that establishes methodology and standards for tracking mode-share, VMT (Vehicle Miles Traveled) and other important transportation data. (P. 24)***

While it is good to be able to measure success in achieving quantified goals, the cost of collecting and maintaining some types of data may be high compared to its value. If this transportation evaluation plan is pursued, it should focus on the most important data that is relatively easy to collect, reliable, and which measures the factors that are most important to the goals of the underlying policies. This recommendation also partially duplicates data collection recommendations in other sections of this plan.

The Madison Area Transportation Planning Board (MPO) should be included on the list of Lead Agencies or Partners for this item.

**Carbon & Energy**

In this section generally, there is some mixing of the concepts of reducing energy use, reducing fossil fuel use, reducing emissions and reducing carbon impacts. While these are all related, they aren't identical, and narrative explaining how they are related and how the multiple goals and recommended actions combine to address the overall issue could be useful.

It would also be useful to include some information demonstrating that the energy conservation goals are reasonable.

***Pg. 28 Goal 1: Influence reductions in transportation related carbon impacts***

***Reduce car miles traveled and increase low-carbon fuel use, so that Madison achieves 10 percent emissions reduction every five years to get to a goal of 40 percent by 2030.***

It isn't clear if this is a community goal or a *per capita* goal. It also isn't clear how emissions will be measured and tracked, particularly in the private sector, or by whom.

One of the action recommendations under **Goal 1** is to “research impacts of downtown toll zones (with electronic monitoring) that target reducing numbers of vehicles and resulting emissions from [the] central city.” City plans seek to promote downtown as a place to work, live, shop and recreate, and to increase the supply of suitable housing and support services downtown so that more downtown workers will choose to also live there, rather than commute. However, downtown is a major employment center and an important retail, cultural, educational and entertainment destination, and facilitating travel to downtown is critical to maintaining this role. Alternative transportation to the downtown area via bus, bicycle and walking already comprises significant component of downtown travel, but driving also is an important, and often the only, option for many. Tolls on vehicle travel to downtown could discourage many of those who drive from coming downtown at all. Over the longer-term, it could encourage employers and businesses to choose another location---one that perhaps would involve more, rather than less, driving. The more effective way to decrease vehicular use would be continued progress in improving the convenience and efficiency of alternative modes, as recommended elsewhere in the plan.

***Pg. 29 Goal 2: Systematically upgrade existing buildings, equipment and infrastructure.***

***Reduce overall energy consumption by 50 percent (kWh and Therms per square foot or equivalent unit of measure) in the public and private sectors.***

Even if **Goal 3** is achieved for new buildings (zero net energy use by 2030), the vast majority of city structures present in 2030 will be those that are currently present. While the recommended actions include further studies, it would be useful for the plan to include some examples demonstrating that this amount of energy use reduction in older buildings is realistic---particularly in the case of building heating.

***Pg. 31 Goal 3: Improve new buildings and developments.***

***Create a target for new buildings and developments to meet zero net energy standards by 2030.***

The concept of zero net energy standards should be clarified since it seems to require on-site energy generation of all the energy needed as well as very high energy use efficiency. See additional comment below.

#### **Actions**

- ***Incorporate Zero Net renewable energy infrastructure into neighborhood development plans where applicable. (P. 31)***

This recommendation suggests that the target of zero net energy use might be partially achieved at the “neighborhood” level, rather than by each individual building---such as by use of neighborhood-scale solar collectors or wind generators, shared geothermal heating generation and distribution, etc. It would be useful to clarify this since in at least some cases, there may be more potential to reach this target collectively than within individual buildings.

- ***Adopt a green roof requirement in the Zoning Code requiring a minimum 50 percent vegetated green roof... (P. 31)***

This requirement could be acceptable because it allows consideration of alternative energy-saving approaches with more (and presumably also with equal) impact. In general, the plan should avoid recommending specific regulations that may represent only one of many potentially successful approaches to achieving the underlying goals.

**Pg. 33 Goal 5** *Obtain 25 percent of electricity, heating and transportation energy from clean energy sources by 2025.*

#### **Actions**

- *Work with utilities, institutions and businesses to authorize, facilitate and design district-scale sustainable energy systems.*
- *Rewrite zoning codes and other regulations to permit district and decentralized energy generation and distribution systems.*
- *Permit and create incentives for decentralized renewable energy utilities...on public and private structures...*
- *Encourage wind power generation on-site, where appropriate, for larger PUD-type and commercial projects...*

This group of recommended actions is related to the comment under Goal 3 regarding neighborhood-scale (shared) energy-generating facilities. Based on these recommended actions, such facilities are clearly encouraged, but whether these collective approaches can count toward achieving the Zero Net Energy goals recommended for all new buildings in Goal 3 should be explained.

Suggest replacing “larger PUD-type and commercial projects” with “larger development projects”.

#### **Economic Development**

**Pg. 36 Goal 1:** *Encourage sustainable business practices.*

#### **Actions**

- *Create a taskforce to review Planning, Zoning, ordinances and Code requirements to reduce obstacles to sustainable business practices and to offer incentives to encourage sustainable business growth.*

These issues were considered as part of the current Zoning Code rewrite process, and we do not believe a separate task force to consider additional planning or zoning ordinance revisions is needed at this time.

**Pg. 42 Goal 7:** *Support [a] diversified economy*

The link between this goal and sustainability isn't explained.

#### **Affordable Housing**

**Pg. 58 Goal 2:** *Build affordable housing on sites that are currently underutilized or unsightly to revitalize neighborhoods and provide housing for the vulnerable.*



## **Actions**

- ***Working with Madison Neighborhood Associations, locate eyesores and/or underutilized buildings, work with developers to rehab or tear down old buildings and convert the space into new affordable housing, and partner with non-profits to obtain grants to build affordable housing for clients. (P.58)***

While any potential redevelopment site should be at least considered when seeking locations for new affordable housing projects, replacing or rehabilitating “eyesores” and underutilized buildings to create additional affordable housing may or may not be a good strategy for stabilizing and/or revitalizing the neighborhoods where these buildings are present. Other potential reuses of these sites might be more effective in revitalizing the neighborhood, thereby benefiting all its residents. In addition, these specific sites may or may not be good locations for residential development generally, or for low-income residential development particularly.

### **Pg. 62 Goal 6: *Provide more green affordable housing.***

## **Actions**

- ***Develop a pilot project to locate new affordable rental units in a stable neighborhood near mass transit lines in order to transform an underutilized, unsightly space into new housing units and provide low-income tenants permanent housing with easy access to support services and mass transit.***

This appears to be a similar recommendation to the action recommendation in **Goal 2**, only applied to a “stable” neighborhood rather than to a neighborhood requiring revitalization. Similar caveats apply, however, in that what some may consider an underutilized, unsightly space may or may not be the most appropriate location for affordable housing; and affordable housing may or may not be the most appropriate alternative use for that site. Many of the actions recommended in the Sustainability Plan combine large numbers of not-necessarily-linked ideas into a single action.

Since the action is described as a “pilot project,” the presumption is that there could be other similar projects to follow. It is important that these initiatives not occur outside of the City’s other well-established neighborhood and land use planning processes---which already seek to address issues related to developing balanced, mixed-use neighborhoods, providing a variety of housing choices, including affordable housing, and encouraging the improvement or redevelopment of unsightly or underutilized properties.

The Planning Division appreciates the amount of effort required to put together a plan of this scope, and hope that these comments will be useful in helping to refine the draft plan and focus its recommendations. If you have any questions about these comments or would like to discuss them further, please let us know.