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Members of the Task Force on Farmland Preservation:

Smart Growth appreciates that many of the draft recommendations of the task force are focused on making land the city government already owns available to lease for urban farming. For example, parts of existing parks and other preserved green spaces that the city government does not have the capacity to maintain could be converted to urban agriculture without decreasing the amount of prime developable land within or immediately adjacent to the city limits that is available for development.

In addition, new development projects are already required by the zoning code to include green space, and garden plots for residents of a new development could be included within that already required green space.

Smart Growth also appreciates that incentives are mentioned in the recommendations focused on preventing the development of prime developable land within the city limits so it can be preserved for urban agriculture. These incentives appear to be ones that do not involve direct outlays of city government funds, but rather provide “bonuses” above and beyond what is permitted by the zoning code and which would have a financial benefit to developers. Smart Growth would welcome an opportunity to participate in future discussions of what those incentives might be. It also is reasonable to question whether such zoning-code-based incentives would provide a sufficiently large value to entice a landowner or developer to agree to permanently commit to no development of the land.

If the city government wants to preserve part of a large parcel for urban agriculture, the city government or nonprofit organizations should pay fair market value to acquire that part of the parcel and construct the street, sidewalks, water main, parking lot, etc. to provide access and utilities to the urban agricultural parcel, since the developer of the rest of the large parcel cannot generate any revenue from the urban agricultural parcel to pay for acquiring that land and providing the infrastructure.

Furthermore, Smart Growth questions the wisdom of preserving farmland within the Madison city limits at the expense of farmland outside the city limits. Preserving farmland within the

Madison city limits does not result in an overall preservation of farmland. For every acre of farmland preserved within the city limits, at least another acre of farmland elsewhere in Dane County will be converted from farming to development because of the demand for new development created by a steadily growing regional population.

From the perspective of promoting farmland preservation and minimizing green-house gas emissions, relatively dense new development should occur within the city limits or on land immediately adjacent to the city limits, not further out in the county. See the Capital Area Regional Planning Commission's document entitled, "Greater Madison Grows Together: 2050 Regional Planning Framework." Preserving farmland within or immediately adjacent to the city limits does the opposite; it pushes more development further out into the county. Preserving farmland within the current or future Madison city limits will reduce the number of housing units constructed within Madison and increase the number of housing units constructed elsewhere in Dane County, because the preservation of farmland in Madison will not reduce the demand for more housing units in the county.

In addition, Smart Growth hopes the task force's report and recommendations will answer the following operational questions.

1. Which source of funds will pay for acquiring land for urban agriculture and providing the infrastructure for that use?
2. Which organizations will administer who receives access to new community gardens and larger parcels for urban farming? If the city government will own the land and administer access to the land, what is the source of funds to pay for the administrative expenses?
3. Will farmers using the preserved urban farmland be allowed to keep more chickens than city ordinances currently allow for a homeowner (8 chickens)?
4. Will farmers using preserved urban farmland be allowed to keep other barnyard animals on the land?
5. Will nearby residents tolerate the pesticides, dust, and animals smells emanating from the preserved urban farmland?
6. How will users of the preserved urban farmland travel to and from the land they are using? If they must drive a vehicle because it is not practical to use transit to reach the land they are using, will a parking lot be provided or will on-street parking be permitted?

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