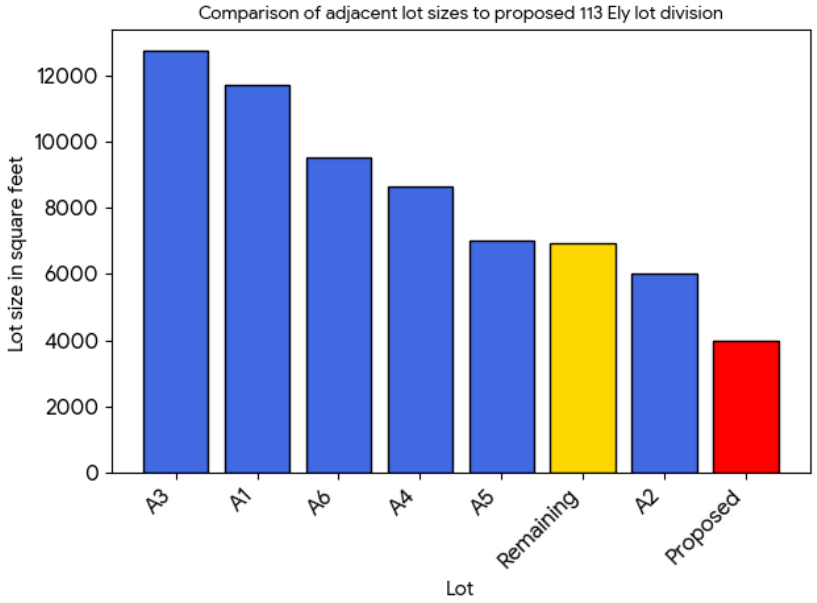
File #93071, Landmarks Commission, objection submitted June 4, 2026

Dear Landmarks Commissioners,

We live at 202 N Spooner St, on the same block as the proposed new lot, but **not** adjacent to it. We believe that two of the three criteria in Landmarks's mandate 41.18(4) are violated by the proposal. For these and other reasons below we respectfully oppose the proposal.

(1) The wording in 41.18(4) is clear: the applicant's *"proposed lot size is **not** compatible with **adjacent** lot sizes*." The numbers[1] speak for themselves.

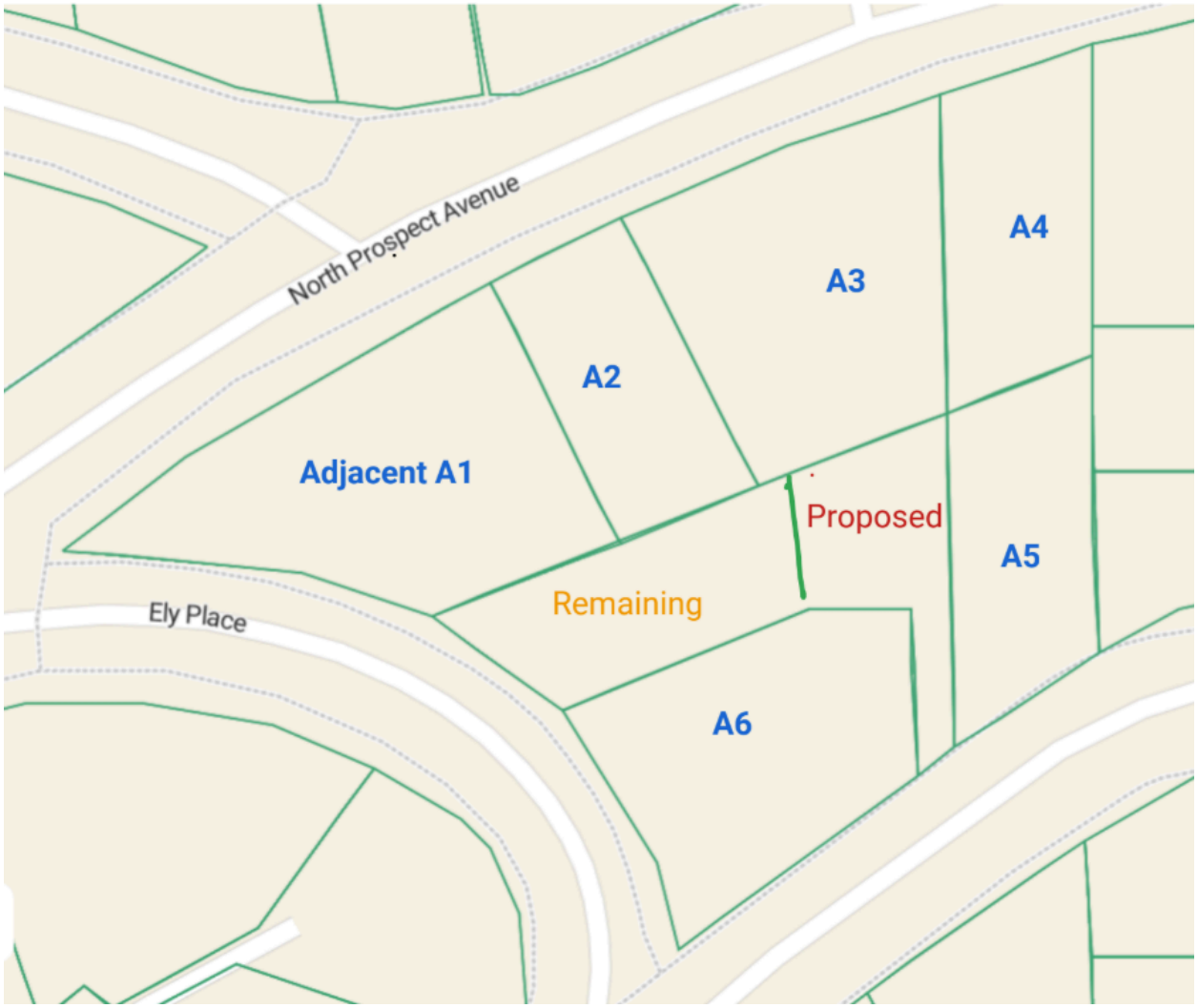
- Proposed new lot: 4,001 sq ft
- Proposed remaining lot: 6,937 sq ft[2]
- Adjacent lots A1 through A6:
    - A1: 11,726 sq ft
    - A2: 6,029 sq ft
    - A3: 12,737 sq ft
    - A4: 8,647 sq ft
    - A5: 7,000 sq ft
    - A6: 9,531 sq ft
- Visualizing these sizes:



[1] Square footages from the City Of Madison's assessor data

[2] We calculated 6,937 sq ft from the City of Madison's assessor data, namely 10,938 - 4,001. The applicant's survey is discrepant at 7,347 sq ft.

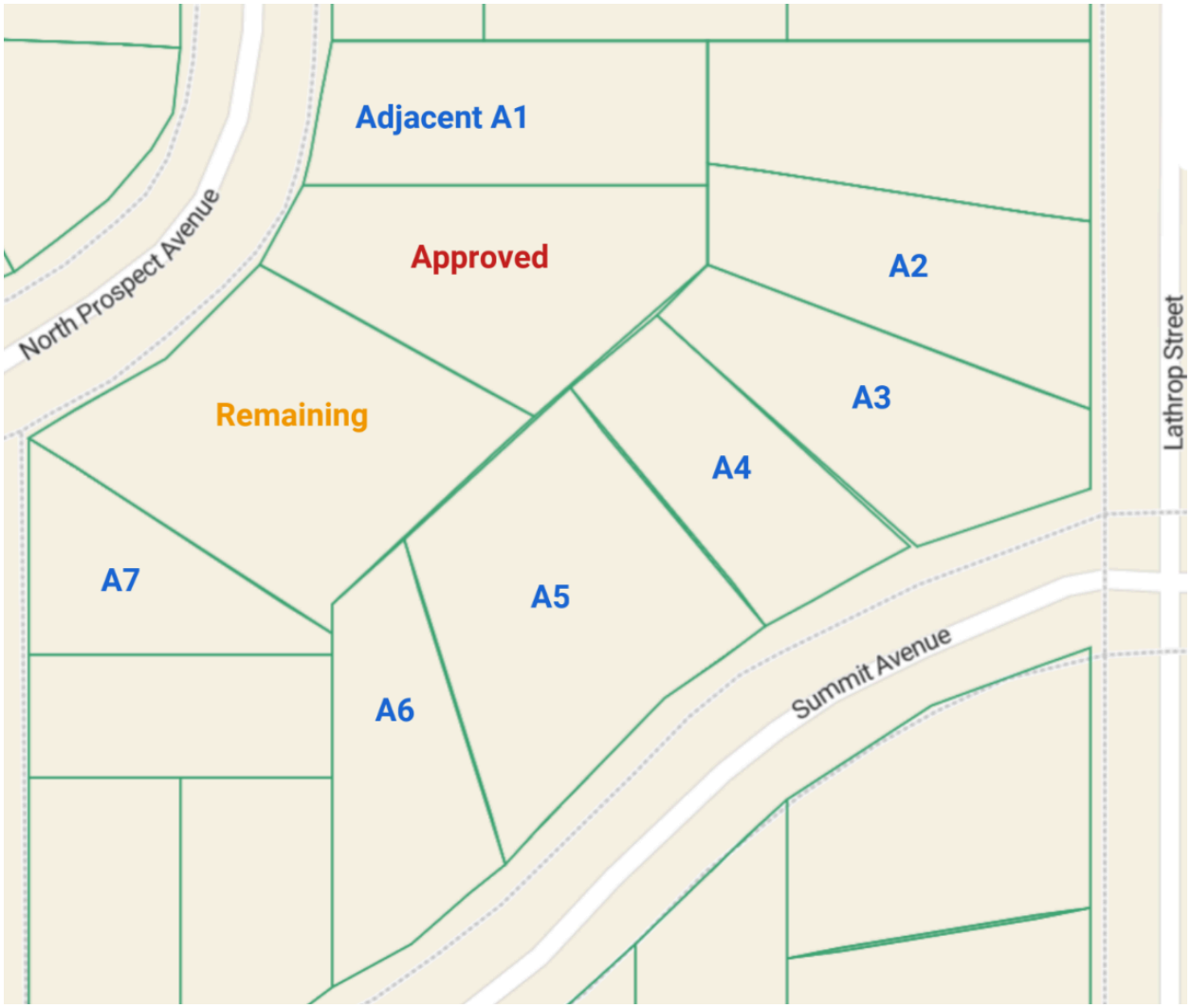
One doesn’t necessarily even need numbers. Here's a visual[3] showing how anomalous the proposed new lot size is compared to the adjacent lots:



The proposed new lot is significantly smaller than every adjacent lot. This fact alone suffices to reject the proposal.

[3] Plot boundaries from https://www.acres.com/plat-map/map

Furthermore, here is a visual[4] of a lot subdivision that was approved, at 209 N Prospect Ave. in the next block east of the subject block:



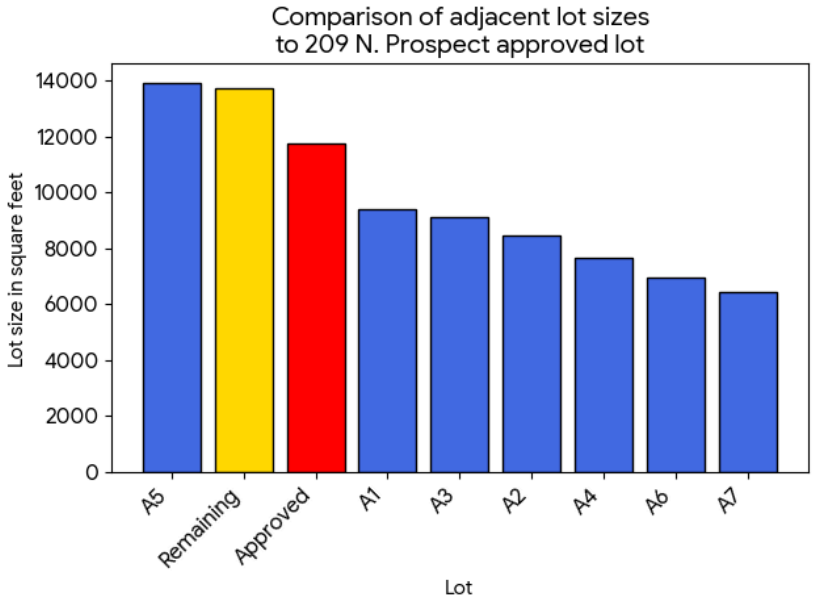
Again, one doesn't need the numbers to notice that the approved lot size isn't "not compatible." Indeed, rather than being substantially smaller than every **adjacent** lot (like the applicant's proposed lot would be); it is actually larger than most of them. Nevertheless, for completeness, here are the numbers[5]:

- New lot 11,761 sq ft
- Remaining lot 13,721 sq ft

[4] Plot boundaries from https://www.acres.com/plat-map/map

[5] Square footages from the City Of Madison's assessor data

- Adjacent lots:
    - A1: 9,418 sq ft
    - A2: 8,490 sq ft
    - A3: 9,130 sq ft
    - A4: 7,658 sq ft
    - A5: 13,930 sq ft
    - A6: 6,957 sq ft
    - A7: 6,434 sq ft
- Visualizing these sizes:



Please also note the applicant's own words: "Importantly, the Landmarks Commission's review under MGO 41.18(4) does not require that new lots be identical to **adjacent** lots in size — only that they be compatible." The applicant is 100% correct ... so far. But he continues, "Given the established range of lot sizes in University Heights, and the TR-C2 minimum as a baseline, the proposed configuration falls well within the range of what is **characteristic of this district.**"

He has deftly shifted the reading of the size clause in 41.18(4) from adjacent lots to non-adjacent lots. Either a lot is adjacent or not; wishful thinking does not transform non-adjacent lots into adjacent ones.

(2) We urge the Commissioners to pay a site visit and view the lot from the entrance to its proposed driveway on Summit Ave. and to imagine typical vehicles driving or parked on the driveway. We believe it would "*adversely impact the historic character*" [41.18(4)] of the home at 1806 Summit Ave (built in 1923) for residents to look upwards at occupants of those vehicles peering downwards at them.

These photos are what the passenger of a vehicle might see through the windshield as they enter the proposed lot through the driveway. We are not claiming scientific accuracy. Both photos were taken as the passenger reaches the front edge of the house at 1806 Summit, about 41 feet in from the sidewalk.

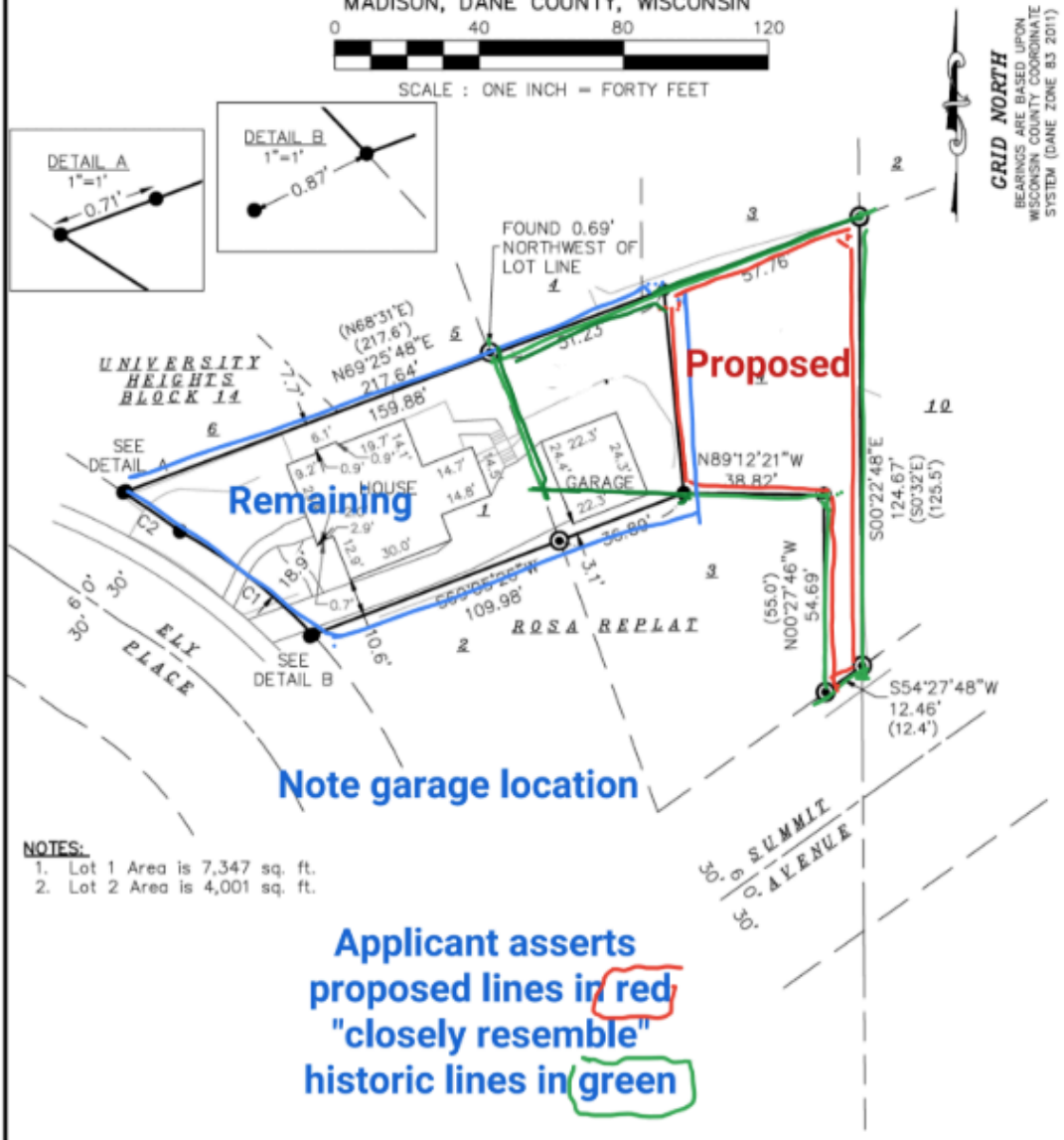
Taken from a passenger's viewpoint, assuming the driveway is leveled by lowering its west edge. (This would entail lowering ground level at the base of the historic retaining wall at 101 Ely Pl. One wonders if this is even feasible without compromising the wall.)

Taken from a 10” higher viewpoint to account for the possibility of leveling the driveway by raising its east edge, i.e. raising the walkway wall of 1806 Summit Ave, assuming permission from the owner.

(3) The applicant cites a "close resemblance" to historic 1924 and 1950 plat lines. This is either disingenuous or a blatant untruth, unless the submitted diagrams of those historic lines are erroneous. Note that the applicant's current garage falls on the wrong side of the **historic** line. In other words, if the applicant wanted to truly honor that historic line, his garage and house would be on separate lots. The following visual shows that the applicant’s “close resemblance” is bogus:

CERTIFIED SURVEY MAP No. _____

ALL LOTS 1 AND 4 AND PART OF LOT 3, ROSA REPLAT OF LOTS 7, 8 AND 9, BLOCK 14 UNIVERSITY HEIGHTS, AS RECORDED IN VOLUME 2 OF PLATS, ON PAGE 5A, AS DOCUMENT NUMBER 436762, DANE COUNTY REGISTRY, LOCATED IN THE SOUTHEAST QUARTER OF THE NORTHWEST QUARTER OF SECTION 22, TOWNSHIP 07 NORTH, RANGE 09 EAST, CITY OF MADISON, DANE COUNTY, WISCONSIN



NOTES:
1. Lot 1 Area is 7,347 sq. ft.
2. Lot 2 Area is 4,001 sq. ft.

Applicant asserts proposed lines in red "closely resemble" historic lines in green

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SURVEYED FOR :
Robert Louis Quintana

MAP NO. _____

DOCUMENT NO. _____

VOLUME ____ PAGES _____

Date: April 20, 2026
Plot View: CSM 1
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(4) The applicant describes the existing residence as a "single-family home." But we are unsure, since the applicant has also applied to create two distinct street addresses (111 as well as 113) within the existing structure. We ask the Commissioners to at least double-check the applicant's veracity on this point, as we are uncertain of the status. Given the pattern of misleading statements we've detected in the current application, we wonder how credible the application is elsewhere, where we have not had the time to scrutinize it. We trust the Commissioners are able to perform thorough due diligence where we have not.

(5) We also have a selfish concern, possibly out of scope. The topography of the block slopes down toward our property. When we moved in, in 2000, our basement flooded during heavy rainfalls. We mitigated by (a) landscaping and (b) laying under-slab drain tile after jackhammering the slab. We are concerned that additional buildings and non-permeable surfaces on the hillside above us would renew the likelihood of flooding, and wonder whether the onus of future mitigation would fall on us or on the owner of new buildings on the proposed lot.

Respectfully yours,
Chamond Liu and Ruth Kearley