# MEMO

To: City of Madison Landmarks Commission
From: John Rolling, Ph.D.
Date: 6/8/2026
Subject: Landmark Nomination for Master Hall (415 W. Gilman Street)
Legistar # 93082

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I am writing in response to a memo recently sent to you by Brad Mullins of Master Hall Associates, in which the property owner expresses objection to the pending landmark nomination.

1. Landowner Objects to Designation

   First, let us be clear that while the landowner has the right to object to landmarking, the landowner's approval or assent is not required to designate a landmark.

   Section 41.07(3) states: "Any person may nominate a site, improvement, or site with improvements for designation as a landmark."

   Section 41.06(3) (a)(1) requires that the landowner be notified my mail 14 days in advance of the Landmarks Commission hearing of a nomination and 41.07(5) requires that the Commission notify the landowner of its recommendation to the Common Council. Finally, Section 41.08(2) permits the landowner of a landmark, present or future, to petition the Common Council for rescission of the landmark designation subject to specific standards for rescission specified in 41.08(3)(a) and (b).

   Nothing in the Landmarks ordinance gives the landowner special standing to object to designation. The ordinance recognizes that the community's interest in the historic resource may well trump the landowner's preference.

2. The Nomination is Meant to Thwart Redevelopment

   Sadly, it is often the case that it takes a pending demolition threat to focus attention on a worthy historic resource. It is physically and financially impossible to "pre-landmark" all the properties that deserve such status. The work necessary to prepare a landmark nomination is daunting. I wrote the Master Hall nomination. I spent a good 40-60 hours in research and writing it. While I did this as a volunteer, the Madison Trust's cost for consultant-prepared nominations over the past several years have ranged $3,500-$7,000 per case.

   Mr. Mullins argues that a goal of the Downtown Historic Preservation Plan was to inform property owners of potential landmarks so as to "eliminate late-arising surprises" for redevelopment projects. Therefore, he implies, the fact that Master Hall was not identified in the plan serves as a green light for demolition. Note that the Downtown Historic Preservation Plan dates from 1998. Much has changed in the intervening 28 years, not least that Master Hall has in the meantime attained and exceeded the 50-year

rule of thumb for historic recognition. I also question Mr. Mullins suggestion that identification in the plan warns developers away. The Stratford Apartments at 433 West Gilman was so identified (Downtown Historic Preservation Plan, p. 21), but is now to be demolished as part of the same redevelopment that involves Master Hall.

3. Master Hall Does Not Merit Landmark Status

   In response to our initial submission, the development team hired Legacy Architecture of Sheboygan to render a negative opinion on Master Hall's historic value. Suffice it so say that your own City of Madison professional staff has rendered a contrary opinion.

4. The Building is in Poor Condition

   The landowner and/or developer obtained a property condition report portraying the Master Hall building as "functionally obsolete." This report avoided any suggestion that the building is currently in disrepair let alone uninhabitable. In fact, the building has been rented out to tenants continuously for over 50 years. Instead, the condition report focused on difficulties in meeting building codes that might be encountered in the event of major reconstruction.

   "Functional utility" is a technical term with which I, a real estate appraiser for over 40 years, am well-familiar. The textbook definition is: "The ability of a property or building to be useful and perform the function for which it is intended according to current market tastes and standards…" (Source: Appraisal Institute, The Dictionary of Real Estate Appraisal, 6th edition, 2015, page 97.) "Market tastes and standards" vary depending on uses and market segments. In the subject's case, standards in the market for naturally occurring affordable housing are much different than those for luxury apartments where quartz-countertop kitchens and rooftop pools ae the norm.

   It is likely that most of Madison's existing landmarked buildings would be considered "functionally obsolete" under the definition the landowner/developers have applied to Master Hall.

   The only condition standard that is appropriate in the evaluation of a prospective landmark is whether the building retains enough integrity to tell the story of its time and place. Master Hall clearly retains its historical appearance and so meets that condition standard.

5. Landmarking is Superfluous: The Building is Already Approved for Demolition

   Landmarking Master Hall now will not void the demolition permit approved by the Plan Commission at its April 13, 2026 meeting. However, landmarking at the present time would protect the building against demolition should the project currently proposed somehow fail to be constructed, due, for example, to inability to secure financing, discovery of some physical impediment (e.g., contamination) or simply a change in the developer's business plans. Recent examples of projects which have failed to consummate are the former MATC/Central High property project(s) on Wisconsin Avenue and the student apartment project planned for the 600 block of West Mifflin between the railroad depot and the Wiedenbeck-Dobelin building, two landmarks.

Section 29.15(2) MGO states: "Razing permits shall lapse and be void unless the work authorized thereby is commenced within six (6) months from the date thereof or completed within thirty (30) days from date of commencement of said work."
In sum, the existing demo permit is specific to this developer and would not survive a six-month delay in the project. It is well possible that this demo permit could expire.

In conclusion, your staff report advises the Landmarks Commission to inform the Common Council that Master Hall meets the criteria for designation as a Madison landmark but to recommend that, in light of the existing demolition permit, that the nomination be placed on file. Doing so would allow the Common Council to revisit/approve this landmark nomination should the current proposed redevelopment project not proceed. I urge the Landmarks Commission to adopt the staff recommendation.

**From:** Nicholas Davies
**To:** Madison Landmarks Commission
**Subject:** Opposition to Master Hall landmark designation (93082)
**Date:** Sunday, June 7, 2026 6:43:50 PM

Caution: This email was sent from an external source. Avoid unknown links and attachments.

Dear Landmarks Commission,

At a previous meeting, I heard the owners of the Master Hall building speak about how the current building functionally cannot be made accessible.

The ground floor lobby is actually recessed and requires going down steps. There's an old elevator for which parts and service are scarce. The apartments themselves have inaccessible doorways and tiny bathrooms; getting those compliant with zoning code would require shifting walls so that the bathroom takes up a large portion of each living unit, but the concrete walls could not be easily moved to expand or combine units. I think there was also draining issues on the upper floors.

Hopefully the applicant will cover this at your meeting. I found it persuasive: this building has a very limited capacity, and that will only dwindle with age. It's already not the building it once was, it already isn't performing the full function it was built for, and that will only continue.

It's my understanding that Landmarks Commission can find the building as historically significant--and that can prompt redevelopment on the site to pay tribute to its design--while designating it as a landmark would limit any possibility of putting this site to the same amount of use that Master Hall originally did, at the very least.

Thank you,

Nick Davies
3717 Richard St