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March 12, 2012

Mr. Bradley J. Murphy, AICP
Director
Planning Division
Department of Planning & Community & Economic
Development
P.O. Box 2985
Madison, WI 53701-2985

Re: Consideration of National Guardian Life Property at 2 E.
Gilman Street in Downtown Plan and Zoning Map

Dear Brad:

This letter concerns the treatment of the National Guardian (“NGL”) property at 2 E. Gilman Street in the proposed Downtown Plan and zoning map. As recognized on pages 29 and 57-58 of the November 2011 draft Downtown Plan (“Draft Plan”), the open land between the National Guardian office building and Lake Mendota (“the NGL Site”) is one of the largest remaining potential redevelopment/infill sites in downtown Madison and maybe the only remaining private vacant land on Lake Mendota in the downtown area.

The NGL Site has great potential for infill development, contributing to the downtown economy and the City’s tax base. In addition, the NGL Site’s substantial Lake Mendota frontage creates an opportunity for lakefront access and amenities, which can contribute greatly to the experience of people who live, work and visit in downtown Madison. As such, planning for the site should allow maximum flexibility to both realize the economic potential of the site and its unique ability to contribute to downtown Madison.

The specific aspects of the Draft Plan which NGL asks be modified are:

- the maximum building height map on page 42 authorize two bonus stories (5+2) for the NGL site;
- the NGL Site be referenced as a mixed-use node on pages 39 and 57; and
- Recommendation 83 be changed to recognize potential nonresidential uses on the NGL Site, with an Urban Office Residential (“UOR”) zoning designation applied to the entire site, including any portion that is released from a Planned Development designation.

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The requested change in the height limitation reflects the unique features of the NGL Site, which, as shown on page 37 of the Draft Plan drops approximately 75 feet from Gilman Street to Lake Mendota. The NGL Site is bordered by the Edgewater Hotel, the NGL office building, Kennedy Manor and the Corcoran apartment building on Pinckney Street, all of which are 5-7 stories tall. While no development is contemplated today, we anticipate the development of the NGL Site will likely involve multiple buildings or building elevations. Allowing increased height on some portions of the site maximizes the flexibility to preserve some open space and desirable view corridors while still allowing for substantial high value infill development on the interior of the NGL Site that complements the surrounding neighborhood.

In addition, any redevelopment will be largely hidden behind the existing adjacent buildings – especially our home office building. Any height restriction should reflect the heights of adjacent properties and allow flexible redevelopment. An unduly restrictive height limitation could require a monolithic building along the lake to achieve an economically viable density. Along these lines, NGL favors the methodology proposed on page 42 of the Draft Plan of measuring height from the street frontage, rather than the averaging of the perimeter method set forth in the current zoning code, as this methodology best accommodates the steep slopes of the NGL Site.

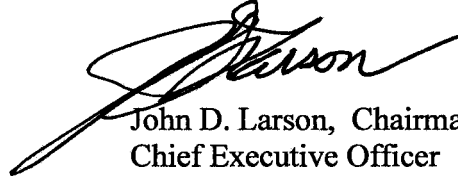
The unique lakefront location and the nature of the NGL Site favors allowing mixed, rather than exclusively residential, uses. The range of beneficial uses of the NGL Site may be dramatically altered depending on what happens with the Edgewater hotel and the proposed bike/pedestrian walkway along Lake Mendota. The January 24, 2012 draft City of Madison Proposed Zoning Districts Downtown Plan Area (“Zoning Map) recommends UOR zoning for the NGL Site. While residential uses likely will be a substantial part of any development of the NGL Site, UOR zoning would allow a range of service, entertainment or retail uses (such as along the rivers in Milwaukee or San Antonio), which would maximize the potential of the site, and is consistent with the existing office building and the neighboring Edgewater hotel and Kennedy Manor restaurant.

NGL recognizes that the long term use and potential redevelopment of the NGL Site is of interest to many downtown stakeholders. NGL takes pride in being a good downtown neighbor and is committed to a use of the NGL Site that benefits downtown and the city as a whole. NGL is very interested in the views and comments of persons who are interested in the future of the NGL Site, and ask that you forward this letter to City Staff, Plan Commissioners and Common Council Members. NGL also invites interested persons to personally tour the NGL Site and meet with us to discuss any concerns. Finally, we request that any other community feedback be forwarded or directed to NGL for our consideration.

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Thank you for considering NGL's request and concerns. We look forward to addressing these issues and responding to questions from your office and others involved in the downtown planning process.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Larson", with a long, sweeping underline that extends to the left and then curves back to the right.

John D. Larson, Chairman &
Chief Executive Officer