

**From:** Susan Millar <sbmillar@gmail.com>

**Sent:** Monday, December 14, 2020 9:29 AM

**To:** Planning <planning@cityofmadison.com>; Kathryn Pensack <Katpen7@gmail.com>; Susan Millar <sbmillar@gmail.com>

**Subject:** Re Legistar #63303 on 12/14/2020 Plan Commission agenda

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Dear members of the Planning Department and the Plan Commission, regarding Legistar 63303 on the 12/14/2020 Plan Commission agenda,

I thank Director Strouder and her staff for proposing a new framework for land use sub-area plans for the City, and providing an initial planning framework for review and comment by the Commissioners. I also appreciate the opportunity to comment as a Madison citizen.

The overview provided in the Director's memo and the staff's presentation slides make clear that the focus of this proposed new framework is to get the city's sub-area plans integrated, coherent, and updated. It also is clear that the Department is bringing an equity lens to this project, has been attending to community voices, and is looking forward to hearing Plan Commissioners responses to their proposal. I applaud all of this,

At the same time, I notice that these documents do not address how this sub-area planning process will help achieve the City's stated climate goals. I also notice that the slide about the Planning Department's listening process, which states that the proposed new framework is "Informed by ongoing Voice of the Customer process; Broader, more standardized approach; consulting with community; centering Racial Equity and Social Justice," does not mention the voices of those of us who have been asking that proposals for new land use developments include strategies for reducing GHG emissions and mitigating other kinds of environmental degradation.

I understand and agree that the equity challenges facing the city now deserve high priority. I also believe that the climate crisis and social equity are deeply intersectional, and that the impact on our climate must be a primary factor when conducting city land use planning. The climate crisis, with its negative impacts on low-income and BIPOC communities, is here, getting more serious with each day. We can't wait.

I therefore ask if you would be willing to add the phrase "*Need to reduce GHG emissions and mitigate other kinds of environmental harm*" to the 7 critical issues that Director Strouder lists on the second page of her memo.

FYI, that portion of her memo currently reads as follows:

"With the overarching goal of an equitable, sustainable, and "right-sized" approach, some of the most critical issues we recognize the need to balance are:

- Accommodation of projected growth

- Increased housing & transportation choices for current and future Madison residents across the city
- Inclusive public participation opportunities
- Equitable land use policies and major public investments
- Timeliness, predictability, and clarity regarding sub-area planning
- Transparency regarding City roles and limitations for plan implementation
- Budget and staff limitations (cannot simply “add another layer” to existing sub-area planning efforts)"

Thank you for considering my concerns and request.

Susan Millar  
2233 Rowley Ave. 53726  
Member, 350 Madison

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I was born when CO2 PPM was 310.5.  
When my youngest grandchild was born, PPM was 400.0 (2015)  
At current rates, when he is 20, PPM will be 430.

See the [data provided by climate.gov](https://data.climate.gov).

Plan Commission

Meeting of December 14, 2020

Agenda #14, Legistar #63303, Planning Division presentation of a potential new framework for land use/sub-area plans.

The staff memo invites Plan Commissioner questions. I am writing to provide my questions.

1. What would district plans achieve?

Page 1 of the presentation lists having "more standardized plans relating to broader, citywide perspective." The Comprehensive Plan, adopted just two years ago, set forth the City objectives for the next 10 years: "This Plan will guide the City of Madison's policies, budgets, growth, and direction for the next generation and beyond." (page 2) Those objectives don't need to remain stagnant for the full 10 years. However, if the objectives change, or if the Comprehensive Plan does not allow for the achievement of the established objectives, shouldn't the Comprehensive Plan be amended?

Page 1 also refers to the amendment/retirement of sub-area plans that "do not reflect current City policy/priorities." Page 125 of the Comprehensive Plan already addresses this issue. The Plan Commission/Common Council can determine that a sub-area plan is inconsistent with the Comprehensive Plan. If that determination is made, then (1) the sub-area plan would be amended or (2) the GFLU map amendment, or Comprehensive Plan text amendment, would be added to a list of amendments to be incorporated into a single, larger update. In the past two years, have there been any such inconsistencies identified?

It seems that development of district plans would be a fairly intensive effort. Thus, it seems worth knowing what specific deficiencies would be fixed by their development.

2. Can/should the GFLU map be separated from the decennial comprehensive plan update?

A big part of the decennial update is the GFLU map. In 2018, a majority (most?) of resident comments were focused on that map. Wis. Stats. 66.1001(2) lists the elements of a comprehensive plan. "Maps" is listed in 5 elements (in relation to housing, transportation, utilities and community facilities, agricultural and natural and cultural resources, economic development, land use). The land use element states:

"The element shall also include a series of maps that shows current land uses and future land uses that indicate productive agricultural soils, natural limitations for building site development, floodplains, wetlands and other environmentally sensitive lands, the boundaries of areas to which services of public utilities and community facilities, as those terms are used in par. (d), will be provided in the future, consistent with the timetable described in par. (d), and the general location of future land uses by net density or other classifications."

Under state law, can the GFLU map be separated from the decennial updates? Even if it can, is it wise to do so or is there an advantage of looking at the City as a whole when updating the Comprehensive Plan?

3. What would a district plan look like?

Page 14 of the presentation states Neighborhood Development Plans (plans for the growth and development of the City's peripheral urban expansion areas) would be "absorbed" into district plans. Other sub-area plans would be "aligned with District Plans, but with different contents." This suggests district plans would follow the formatting of NDPs. Two NDPs, Nelson and

Rattman, were adopted in 2019 (Rattman was an amendment). Both of these plans used the same description for "housing mix 3." Is that the intent of district plans – that there would be standardized categories across all districts for the various uses? Or would district plans look more like the Mifflandia plan, adopted November 5, 2019, which aligns the various recommendations with Comprehensive Plan goals and strategies?

#### 4. Would district plans be a replacement for sub-area plans or be an added layer?

Page 16 of the presentation states: "Where a District Plan overlaps an existing sub-area plan in geography and content, District Plan supersedes and existing plan would be amended/retired." Since district plans would cover every part of the City, only content remains as a reason to keep parts of a sub-area plan.

This could mean that elements of sub-area plans would be deleted (perhaps changed) and moved into a district plan. Other elements could potentially remain in sub-area plans. The recently adopted Triangle Monona Bay Neighborhood Plan is 73 pages long and contains much that would not be likely to be incorporated into a district plan - for example, there is a page about designing dementia-friendly neighborhoods, and there is a recommendation to have a mid-block sidewalk connecting West Main to West Washington. Where would this type of detail be placed, if anywhere? What would, in general, be lost if the City moves to district plans?

#### 4. Does using Census Tracts make sense?

Would it be better to create districts based on more cohesive uses? For example, proposed district #7 is primarily long-established single family dwellings with development along corridors. Yet district #7 would also include the Oscar Mayer plan area, an area with no low or low-medium residential uses.

#### 5. What of community involvement?

Page 2 of the staff memo discusses the need for "deeper public participation" in low and moderate-income areas. What would be the level of public participation in other areas of the City?

How would district plans impact resident voices on a development project? For example, if NDP-type language is used to form the basis for what a district plan looks like, and if there are standardized housing categories, would a project approved in district #4 as a "housing mix 3" be able to be used as precedent for a "housing mix 3" in district #7? Or even in the same district, could a 12-story high-density residential project approved along Roth and the railroad tracks (Oscar Mayer Plan) be used as precedent for approving a 12-story project in one of the Tenney-Lapham areas that allows for high-density residential (since the district plans would also include zoning changes per page 15 of the presentation materials)?

#### 6. Are the growth numbers (page 10 of the presentation materials) accurate?

The Comprehensive Plan was based on a projection of "40,000 new housing units" by 2040 (page 2), so that would mean 40,000 new units starting in 2017 (when the process started) or 2018 (when the Plan was adopted). Yet the map for "projected increase in households" reflects a total of 34,172 households.

That map is also reflects growth for the period of **2010-2050**. From 2010 through November 2020, approximately 17,000 housing units were added in the City, per issued building permits

(about 5,000 of those were added since the start of 2018). Does that mean the current growth projection is approximately 17,000 units since 17,000 have already been built?

Proposed district #7 reflects a growth of 2,660 units for the period of 2010-2050. This area has added approximately 2,300 units from 2010-2020 (buildings with 5 or more units), leaving a growth gap under 400 units. Yet the Oscar Mayer plan claims the potential to add over 2,500 new housing units.

Proposed district #9 has a projected growth of 392 units. Yet that area includes East Towne, an area designated in the Comprehensive Plan as a regional activity center, an area for mixed-use infill and redevelopment. Certainly East Towne alone can support more than 400 new units (see page 148 of the Comprehensive Plan). Or perhaps that is no longer being considered as a regional activity center?

#### 7. Do BUILD plans remain relevant?

The Marquette neighborhood has three plans prepared as part of Better Urban Infill Development, a program that plans and implements infill development through planning grants. (Other neighborhoods also have sub-area plans developed through BUILD.) The BUILD program goals are:

- Promote infill development, redevelopment and efficient use of existing infrastructure
- Stabilize and enhance existing neighborhoods, downtowns and business districts
- Revitalize communities
- Avoid converting productive farmland on urban fringes
- Provide viable options to auto trips by supporting walking, biking and transit
- Attract private investment
- Improve the lives of those of low to moderate income living in the community
- Lead to the clean up of contaminated sites
- Encourage improvements that promote healthy living

Those goals substantially overlap with Comprehensive Plan goals. In some cases (e.g., the Capitol Gateway Corridor Plan) a goal was to create an inviting, vibrant boulevard while protecting the capitol view and respecting/strengthening existing neighborhoods. In some cases (e.g., the Design Guidelines & Criteria for Preservation, Williamson Street 600-1100 blocks) the goal was to address "increased pressure for new development that has the potential to threaten the unique character of the Third Lake Ridge Historic District." In general, BUILD plans specifically planned for development before development occurred so that the development would be appropriate to the neighborhood.

Should plans that were specifically created to address development while maintaining neighborhood character be respected and followed? Or have development pressures increased such that the neighborhood character is of less (or no) importance?

#### 8. Timing?

The Comprehensive Plan is only two years old. Should the possibility of districts plans only be explored at this point, for possible incorporation into the new comprehensive plan?

Respectfully Submitted,  
Linda Lehnertz