



MEMORANDUM

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PLANNING DEPARTMENT

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TO: Greenfield Neighborhood Plan Steering Committee
FROM: Brad Sippel, Community Development Planner
DATE: 2/21/2025
SUBJECT: Responses to Greenfield Neighborhood Plan Petition and Friends of Waubesa Wetlands letter to steering committee

Background

On December 2nd, 2025 the City of Fitchburg received a petition regarding the Greenfield Neighborhood Plan signed by 181 Fitchburg residents. On the same day the Friends of Waubesa Wetlands also submitted a letter to the Greenfield Steering Committee and project staff. Both were received on the day before the scheduled December 3rd Greenfield Steering Committee meeting to discuss utilities, stormwater, and traffic. Staff made the difficult decision to postpone the Greenfield Steering Committee meeting until city staff and MSA could address the requests made in the petition and the letter, many of which are about stormwater, water quality, and utilities. This memo lists the request of each and provides the recommendations by staff to address the requests.

Staff comments and recommendations are *italicized in blue* below each request.

Recommendations by the Friends of Waubesa Wetlands

1. Utilize the attached map developed by Joanne Kline to ensure development within the Greenfield Neighborhood Plan maximizes the preservation of wetland resources, including the restoration of wetland area as shown and adequate buffer zones (again as shown) to preserve the wetlands in the area and the Murphy's Creek watershed.

The final document will reference the Kline study in the existing conditions. It will also include language similar to McGaw Neighborhood about restoring wetlands. In the document, we created a map identifying where wetlands could be restored based on the potentially restorable wetlands in the Kline study. Some of the identified restorable wetlands in the Kline study are conveyance ditches within farm fields - generally considered low-quality wetlands with buildup of contaminants. Low-density development with properly designed and constructed stormwater best management practices (BMPs) will improve current conditions and will convey the stormwater that is treated prior to releasing some of the stormwater (that is not infiltrated into the soil) to higher quality wetlands. The final document will prioritize wetland restoration in areas contiguous with Swan Creek and Murphy's Creek (priority 1) and existing high-quality wetlands (priority 2).

2. Estimate watershed impacts of development and require all development meet the goal

of a zero increase in overall runoff through the use of permeable surfaces, rain gardens, settling ponds and other means as was done for the McGaw Neighborhood Plan.

An option is to require 100% stormwater stay-on rather than the typical 90%, as was done in the McGaw Park Neighborhood urban service area amendment. In 2017, State Statute 281.33(6)(a)(1) was changed to limit the ability of local governments to adopt higher standards for runoff quantity. The Capital Area Regional Planning Commission (CARPC) will need to include a 100% stay-on requirement as part of the urban service area amendment for this to be enforceable by the City. 100% stay-on will increase the amount of stormwater management needed for new developments, but this is good practice to reduce stormwater flows in new development considering the importance and sensitivity of the Waubesa Wetlands and the existing stormwater issues in Greenfield. The conceptual stormwater management plan uses a 100% stay-on goal and pre-settlement conditions as the baseline for the stormwater modeling, rather than the existing conditions (agriculture) that is typically used.

The City Engineer also has authority granted by City ordinance to require additional stormwater management to ensure runoff from new construction is discharged at non-erosive rates and does not exceed the flow capacity of downstream stormwater infrastructure.

3. Retain ample open space for native vegetation, wildlife, and human well-being, including plans for citizen involvement in nature restoration and hands-on education and citizen science.

There are approximately 308 acres of protected open space included in the preferred land use concept, compared to approximately 122 acres of currently protected open space in the Greenfield study area. With support of the steering committee, staff is willing to add a recommendation that encourages volunteer restoration, education, and citizen science on public land. (Note: this does not include staff time and resources).

4. Installation of a USGS monitoring station at the intersection of Murphy's Creek and Lalor Road, similar to that located at the intersection of Swan Creek and Lalor Road. The USGS, Town of Dunn and other partners may be available to work with the City and developers to fund the installation and operation of this station (as occurred with the Swan Creek USGS station).

The City could explore the installation of a USGS monitoring station at Lalor Road and Murphy's Creek. This location is in the Town of Dunn. The Swan Creek/Lalor Road monitoring station is funded jointly by USGS, City of Fitchburg and Town of Dunn.

5. Consider recycling wastewater to reduce demand for new high-capacity wells.

This is broader policy direction that is not appropriate in a neighborhood plan. Planning staff believes that the City will have limited ability to implement this request. The plan can encourage developers to explore using graywater recycling systems in new developments.

6. Use adaptive implementation: Phase development projects, assess each phase; determine which objectives were and were not met; solve problems and correct flaws to adopt solutions that are shown to be effective.

While this may be a good idea, adaptive implementation as proposed presents some practical difficulties that would need to be worked out. How are development projects phased, and what parameters are used to determine that phasing? Who assesses each phase to determine which objectives were not met? What changes can be made between development phases, and what will be our enforcement mechanism?

We can change a neighborhood plan through a minor comprehensive plan amendment or a sub-area plan. Such amendments are not designed for adaptive implementation. This is a policy document. It is poorly adapted for implementation like a strategic plan. These amendments are rarely used and only to address significant inconsistencies or major development shifts. Changes can be difficult for neighbors, the City, and the development community. The City needs to balance flexibility with the community's shared expectations set by the neighborhood plan.

Requests by Greenfield Neighborhood Petition

1. Conduct professional hydrologic and environmental assessments on development impacts to the area's natural springs, wetlands, and waterways before designating any land areas for development opportunities. Assessments should include stormwater and flooding impacts to safeguard properties. Evaluations should include input from expert engineers and the Wisconsin Department of Natural Resources.

The neighborhood plan is created to guide future development, but it is not a development plan in and of itself. The planning team has developed high-level – at an appropriate scale – hydrologic and environmental assessments to locate future land uses and stormwater facilities. These analyses were performed by professional engineers at MSA and reviewed by professional engineers on City staff.

More detailed assessments are not particularly helpful at the neighborhood planning scale and would likely not change the final neighborhood plan. More detailed professional hydrologic and environmental analyses must be done as part of all development projects, such as new subdivisions and new business parks, prior to any new roads and infrastructure. Site level development is the appropriate scale for more detailed engineering and planning.

Staff believes that the 100% stay-on requirement would address concerns regarding natural springs, wetlands, and waterways. The other options proposed above to manage stormwater and infiltration further improves the condition of these hydrologic features. Staff has reviewed the plan with Wisconsin DNR water resource specialists.

2. Ensure curb, gutter, sewer, and sidewalk are not installed on properties within the developed neighborhood, due to implications on stormwater drainage, costs, and disruption to homeowners.

The plan is not proposing curb and gutter, sidewalks, or sanitary sewer for most of the existing neighborhood. Sanitary sewer in the existing developed area is proposed only where necessary to serve new development on the west side of the neighborhood (and potentially further west toward Fish Hatchery Road). These locations are along Irish Lane and Old Indian Trail. Planning staff cannot "ensure" that infrastructure will never be installed in the neighborhood. At some point, for example due to failing septic systems, the neighborhood property owners may request sanitary sewer. Current practice is to install curb, gutter, sidewalk, and sanitary sewer where necessary due to new development, safety, stormwater, or sanitary issues.

3. Create Low Density Residential buffers adjacent to existing single-family homes. Ensure building heights are compatible in scale with existing properties. The height of any proposed structure shall not exceed two (2) stories above ground level in height within two hundred (200) feet of an existing single-family or duplex lot.

Fitchburg's existing R-L, R-LM, and R-M (Low Density Residential, Low-Medium Density Residential, and Medium Density Residential) zoning districts allows up to three stories or 35 feet. The preferred land use concept already includes low-density buffers adjacent to existing low-density development. A two-story maximum requirement as a design guideline in the plan will not be enforceable through the City's existing zoning code. In practice, low density residential rarely exceeds two stories, so this would likely have little impact on the plan. A map showing the proposed 200-foot buffer is included.

The land included in the 200-foot buffer is predominantly low-density residential, park and open space, and agrihood. There is a small section of medium-density residential on the north side of Irish Lane, but there is a greenway proposed on the north side of the road in part to buffer the existing low-density residential from any new medium-density residential. There is one corner of a lot of medium density residential shown inside the buffer in the northwest portion of the neighborhood, but this section is not within 200 feet of any existing structure. Finally, there is a corner of neighborhood mixed use included in the buffered area on the northeast side of the neighborhood. The adjacent proposed low-density residential was intended to create a buffer between the residences along Bydawee Trail. The boundaries of those two future land uses could be altered to follow the buffer and would result in slightly more neighborhood mixed use in the area.

4. Ensure streets within the developed Greenfield Neighborhood are not connected to new development areas. Remove extension of Old Indian Trail. Connect the southern bike/pedestrian path at Gold Drive instead of Old Indian Trail. Remove the bike/pedestrian path connection at West Hill Drive.

*Staff believes the east-west connections are essential for neighborhood connectivity, consistent with Fitchburg's Comprehensive Plan, and an improvement in emergency services access and road maintenance efficiency. The connections at West Hill Drive and East Hill Drive are proposed as multi-use paths. Old Indian Trail is the only street connection proposed between Irish Lane and Byrne Road. There is **one mile** between Byrne Road and Irish Lane, which far exceeds the typical distance between streets in urban and suburban neighborhoods. A typical urban neighborhood might have 200-1,000 feet between streets, while a typical suburban neighborhood might have 300-1,500 feet between streets. The proposed street connection at Old Indian Trail still leaves **over 3,000 feet** between Irish Lane and Old Indian Trail, and **over 2,000 feet** between Old Indian Trail and Byrne Road.*

The Old Indian Trail right of way is public and it was clearly intended to continue to the west as the Greenfield Neighborhood continued to develop. The likely route for a sanitary sewer extension to serve the southwest portion of the study area runs west along Old Indian Trail. Regardless, the Old Indian Trail extension will host public utilities, and the land will either remain a public right-of-way or have a public utility easement.

The connections at West Hill and East Hill Drive are important to connect residents and amenities between the existing and new parts of the neighborhood, e.g. Greenfield Park and future new park and open space amenities to the west. A multi-use path would maintain connectivity for bicycle and pedestrian travel and could provide for emergency

access if needed. The City owns the narrow strip of land west of West Hill Drive that would allow for connecting the multi-use path with no impact to existing properties. We understand concerns about traffic increases on streets without sidewalks. We believe that a multi-use path connection as proposed at West Hill Drive and/or East Hill Drive will have no undue burdens on the existing residents.

5. Further reduce land areas assigned as Business Park and High Density or Medium-High Density Residential.

The business park and higher density land uses were kept to the east side of the neighborhood for this reason. The neighborhood plans must be consistent with the Fitchburg comprehensive plan, Growing Fitchburg 2030. The plan states that Fitchburg will grow by developing and maintaining attractive and dynamic neighborhoods that have diverse housing options, a variety of businesses, and inviting gathering spaces (page 1-3). A future Greenfield Neighborhood consistent with the comprehensive plan would provide a variety of housing types, include retail, service and jobs appropriately placed and sized, and reduce automobile dependency and increase transportation options.

Higher densities allow Fitchburg to meet several of its comprehensive plan goals. Higher densities reduce the amount of new land needed to meet the growing population of the region, meaning more farmlands can be preserved while accommodating the same population growth. Higher densities can create more compact and walkable communities, and establish viability for future transit service, as ridership thresholds need to be met to ensure cost-effective transit. Planning for a mix of densities provides a range of housing options in the city, which facilitates the diversity of neighborhoods and allows for aging in place.

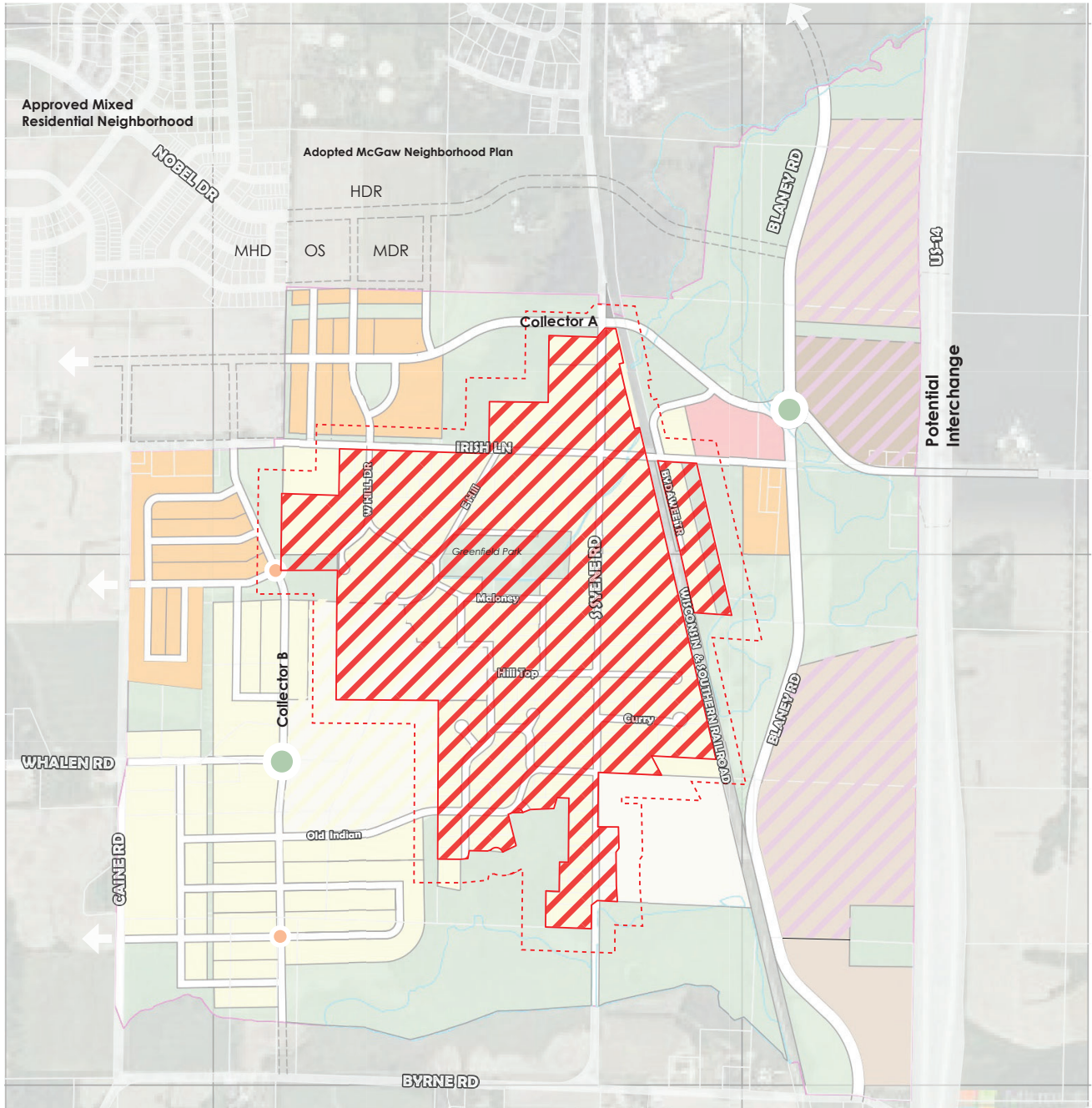
Further reducing residential density and employment opportunities would have a long-term impact. Studies have repeatedly shown that low density residential costs more in public services than it generates in tax revenue. Land costs in the Dane County region are high and the initial investment in infrastructure is expensive, meaning that low density residential costs significantly more to build than higher densities. Although this initial cost is passed onto future occupants of the new homes, the long-term maintenance of streets and utilities is carried by all residents of the City, including the existing Greenfield property owners.

6. Preserve existing agricultural lands on key properties as Farming/Agriculture to maintain the historical nature of the community and respect property owner intentions.

Nothing in the plan requires the agricultural areas to develop. Existing agricultural land uses can continue if the property owners wish, for as long as they wish. This plan helps guide decisions should a landowner decide to develop or sell their land for development. Densities have been reduced adjacent to the existing neighborhood through this planning process, and areas have been identified for agrihood, allowing this use to continue and/or include clustered homes.

Fitchburg's future urban development areas (FUDAs) were created to concentrate development in specific areas, which is part of the City's strategy for preserving farmland. If the City requires the preservation of specific farms within the Greenfield area, it restricts the landowners from doing anything other than what is allowed in agricultural zoning districts, even if development occurs around the farms and the operation of a farm in that location becomes unviable. Doing this does not reduce the development pressures adjacent to the existing urban service area and development will

occur elsewhere in the area, potentially at much lower densities in adjacent towns (thus consuming more farmland for the same population increase). Since the center portion of the Greenfield study area is already developed, it is a more strategic area for development to maximize the preservation of farmland in Fitchburg.



LEGEND

-  Core Neighborhood
-  200ft buffer

