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August 6, 2026

Bridgit Van Belleghem  
Senior Planner  
Dane County Planning and Development  
Room 116, City County Building  
Madison WI 53703

Re: County Board Ordinance Amendment 2026-OA-009: Incorporating amendments to the Town of **Verona** Comprehensive Plan into the Dane County Comprehensive Plan

Dear Ms. Van Belleghem,

This letter is in response to the memo regarding incorporating amendments to the Town of Verona Comprehensive Plan into the Dane County Comprehensive Plan. The town would like to address several points made in the memo for clarification and comprehension.

The Town of Verona is and has been under extreme development pressure from urban neighbors and Dane County to create natural areas. In the last six years, the town has lost more than 10% of its land to the Cities of Verona, Madison and Dane County. These pressures and ETJ from the cities of Madison, Verona and Fitchburg, as well as the ever-expanding land needs of Epic Systems are at the forefront when the Town considers Comprehensive Plan amendments that are not landowner driven. Of equal weight is the fiscal viability of the town. For more than two decades, the Town has been debt-free and relies on moderate expansion of the tax base to stay fiscally solvent and maintain a high level of service. The process of Comprehensive Plan Amendments submittal and approvals is carefully administered and considered by Town Staff, the Plan Commission and the Town Board.

With regard to the staff memo, the Town would appreciate careful consideration of the following points when discussing incorporation of the Town of Verona Comprehensive Plan Amendments into the Dane County Comprehensive Plan.

### **I Summary**

*The Land Use Element now identifies several parcels for potential use for mineral extraction and the map has seen substantial expansion of areas planned for rural development.*

Town Response: The amendment seeks to add language to Chapter 9 acknowledging the presence of a nonmetallic mineral deposits for four parcels located in the southwest portion of the town. These four parcels are already included in the Dane County Comprehensive Plan Mineral Resources Map. Additionally, the subject property is a registered WI DNR NR135 Marketable Mineral Deposit. It should be noted that the addition of this language provides consistency with the Dane County Plan but does not in any way, indicate support of mineral extraction projects by the town board,

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plan commission or any other town body.

*City of Verona staff have expressed concerns that the proposed amendments are contrary to provisions of the town/city inter-governmental boundary agreement (IGA) and have requested that the town pause further action on the changes.*

Town Response: The City/Town Boundary Agreement expired in June 2026. The concerns of the city regarding this are no longer relevant.

#### IV Background

A. 1. a. *Seventy-three acres were annexed to Verona in the north west.*

Town Response: The total acreage due to annexation in the northwest is 276 acres. This includes the new Veridian neighborhood and lands annexed into the City by Epic Systems.

d. *Dane County purchased 720 acres that is being converted to Natural Resources and Recreation. This removes several parcels from being developed ...*

Town Response: 280 acres of these purchases were designated as RR 2-4 acres in the 2018 TOV Comp Plan Future Land Use Map. An additional 80 acres were designated at RR4-8 in the 2018 Comprehensive Plan.

e. ii. *Because this area is in the City of Verona ETJ ,any new residential development will likely be contested. Thus, the property owners in the town who wish to develop their land and remain in the town will likely pursue condominium plats because they cannot be vetoed by the City of Verona. Typically, condominium plats do not include sidewalks, curb and gutter, or other amenities common in Urban Service Area.*

Town Response: The majority of Area 4 is in the City of Fitchburg ETJ portion of the Town (see attached map) and is therefore not subject to the City of Verona ETJ. Additionally, the TOV Land Division and Development Ordinance requires the use of Conservation Subdivision Design principles for new developments in the Town. There is not a distinction between subdivisions that are platted and condo developments in terms of design, whether that be streets, stormwater facilities or other amenities. The application of design elements typical of Urban Service Areas does not make sense for rural developments. There are, however, several Town neighborhoods that have curb and gutter because that design element was most appropriate for the stormwater conditions.

Table 1: Estimates of Land Conversion and Housing Unit Impacts of Future Land Use Map Changes  
*Map Key Area 9 -*

Town Response: There is no area 9 depicted on the map.

Total lands annexed to the City of Verona since 2018 is 1323 acres. This is **more** than the total acres requested to be changed to Rural Residential categories since the 2018 TOV Comprehensive Plan was adopted.

#### 2. Consistency with other provisions of the Dane County Comprehensive Plan

*Housing: Potential conflict with smart growth goals to direct residential development to urban service areas and minimize land converted from agriculture for non-farm uses*

Town Response: Smart Growth goals are by design, in conflict with rural residential goals. The town requires a Conservation subdivision design for new neighborhoods, unless they are under

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20 acres in size and adjacent to an existing City of Verona or City of Fitchburg neighborhood. Conservation subdivision design requirements include at least 30% Open Space preservation, a stewardship plan for the open space, and at least 90% infiltration rates. As noted before, the Town of Verona is unique in terms of Towns located in Dane County due to its proximity to the Cities of Madison, Fitchburg and Verona. The strict application of Smart Growth goals in this context is not appropriate.

*Transportation: Potential conflicts since development at this scale and density would likely impact demand on local and county transportation infrastructure. Traffic impacts could require improvements to existing infrastructure.*

Town Response: The vast majority of traffic in the Town of Verona is pass-through traffic and not Town generated. Further, the Town requires independent Traffic Impact Analyses of new developments to determine any potential impacts that a development might have on adjacent roads, and improvements suggested as a result of the analyses are required as part of the approval process for the development.

*Agricultural, Natural & Cultural Resources: If the designated areas are developed into 2 and 4 acre lots, significant amounts of farmland would be converted out of agricultural use. However, the majority of these areas were previously designated as Agricultural Transition in the 2018 Future Land Use Map, indicating the intention to allow for more intense development over time. The Town of Verona Comprehensive Plan states that “the primary intent of this classification is to conserve rural use lands that may someday be used for rural residential development or lot splits in the next 20 years.” The density policy for this designation is stated as “the highest default density for planned Transitional Agriculture areas shall be 1 residence per 8 acres, unless the development meets the Town’s standards for a conservation subdivision, a land condominium development or a Planned Unit Development, or public water and sewer are available.”*

Town Response: A CSM is the only vehicle by which lots can be created at 2 or 4 acres. The Town’s Land Division and Development Ordinance governs lot and unit sizes for plats and requires the use of Conservation Subdivision design principles. Lot/Unit sizes range from 1.2 to 1.5 acre minimum using these principles, with 30% total open space preservation in the development. Maintaining rural character is a cornerstone of the Town’s vision statement.

***Economic Development: No significant conflicts found.***

***Land Use: Conflict with goal to remain rural/agricultural with this greater interest towards residential development. Developing at rural residential densities of 2-4 acres in Area 4 conflicts with county plan objectives calling for efficient land use. Higher density development with the full complement of urban services would lead to more efficient and compact land use pattern.***

Town Response: County Plan objectives calling for “efficient land use” by nature make it difficult to allow for town growth. The Town of Verona, as mentioned previously, is under development pressure similar to those of adjacent municipalities. The town carefully considered what areas of the town made the most sense for farmland preservation and prioritization when creating the Comprehensive Plan and when evaluating Comprehensive Plan Amendments. To that point, an amendment requesting a change from 4-8 to 2-4 in the southwest portion of the town was denied in this application cycle. If the criteria of “efficient land use” was strictly and broadly applied, towns in Dane County would not be able to grow at

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all.

***Intergovernmental Cooperation:*** *The City of Verona was notified and responded with concerns over various aspects of the proposed changes. See attached memo from the City of Verona for details. The City of Verona particularly objects to the draft Future Land Use Map amendment area 4. The City anticipates growing into this area, has a neighborhood plan for this area, and anticipates service demand for the major road ways to exceed the capability of town resources. The City does not have growth plans west of the Sugar River. The City of Verona and Town of Verona Joint Planning Agreement expires June 20, 2026. A new agreement has not been reached.*

Town Response: The Joint City/Town Boundary Agreement has expired. The town has made numerous attempts to begin discussions regarding a successor agreement and the City of Verona has been unwilling to negotiate to date. In fact, the City of Verona incorporated all of the Joint City/Town Planning Area as defined in the expired Boundary agreement as their growth area in the Draft Envision Verona Plan. Correspondence regarding a proposed successor agreement is attached. The Town should not be subject to objections from the City of Verona that are no longer relevant. The Town remains willing to negotiate a successor Boundary Agreement in good faith with the City of Verona.

The City of Fitchburg was also included in the request for comments on the amendments. They did not respond.

#### 1. Other Considerations

- a. *The Dane County Comprehensive Plan is required by state law to include the plans of cities and villages. Adopting the Town of Verona Comprehensive Plan in its entirety would create contradictions in within the Plan.*

Town Response: Similarly, adopting the City's Draft Envision Verona Plan would create contradictions. It is unclear how the County establishes priority of land use goals in these situations.

- b. *The Town of Verona has a formal review window that invites property owners to request changes to the Town of Verona Comprehensive Plan every three years. Several of these changes were initiated through this process.*

Town Response: The process is on a two-year cycle.

- c. *Residents and natural resource interest groups are concerned of the impacts from mineral extraction operations in and near the Sugar River Corridor.*

Town Response: The Comprehensive Plan Amendment regarding additions to the text of Chapter 9 merely acknowledge the presence of nonmetallic materials – in a location already included in the Dane County Comprehensive Plan. This does not in any way imply approval of any future nonmetallic mineral mining. In fact, the most recent submission for nonmetallic mineral mining via a CUP was denied by the Town.

## V. COMMENTS BY OTHER LOCAL GOVERNMENTS OR STATE AGENCIES

A. *City of Verona: General opposition to shift towards rural residential, particularly Area 4. See City of Verona South East Neighborhood Plan here: [Map Text](#) (2010).*

Town response: The City of Fitchburg declined to comment. It should be noted that the reason that the

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City of Verona is against a shift towards rural residential is because they want to reserve Town land for their own growth, whether it be 10 or 50 years in the future, planned or unplanned, rather than provide an opportunity for the town to add rural residential developments in the form of conservation subdivisions.

Thank you for consideration of these comments. These amendments were considered carefully over several months and multiple meetings of both the Plan Commission and the Town Board. The Town would like to see the proposed amendments adopted by the County to ensure that the Town of Verona remains viable, debt-free and with no reduction in services required by Town residents.

Respectfully,

Sarah Gaskell, Planner/Administrator  
Town of Verona

Cc: Mark Geller, Town Board Chair

