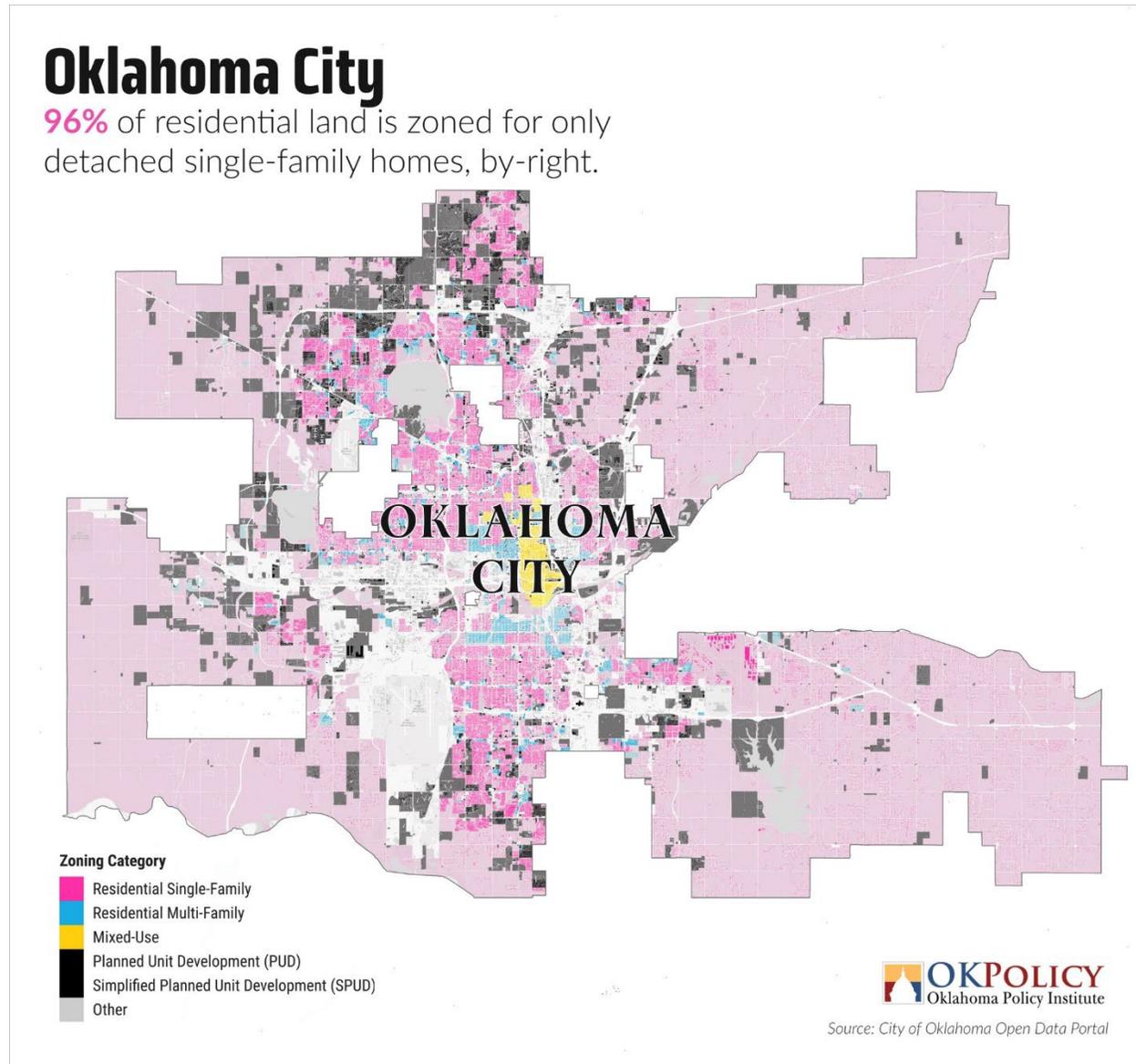


Regarding Infill Housing, Specifically SPUD 1581 and 1596



I own and live in the 110 year-old house at 1620 NW 17th Street, directly east of the subject property of SPUD 1596. I am also architect and infill developer practicing in the core of Oklahoma City, though I have no affiliation with either project here.

I write to express my conditional support of SPUD 1581 (30th and Hudson) and SPUD 1596 (17th and Blackwelder). Perhaps more importantly, I write to protest the regulatory capture that small groups of well-organized homeowners have achieved in regards to land use Oklahoma City. The NIMBYs of Jefferson Park, Crown Heights, Linwood, Heritage Hills, and Helm Farms do not

represent the democratic public opinion or the public interest. When staff and the commission show deference to these groups and deny housing in these locations¹ they act at the expense of:

1. **Public school enrollment.** The population of these neighborhoods has declined dramatically as American average household size has been nearly halved over the last 50 years. Unless the OKC allows more homes in these areas, there are simply not enough children left to keep the neighborhood schools open. We have already seen the closures of Gatewood, Putnam Heights, and Edgemere elementary in the past few years. All schools that had plenty of demand, yet enrollment dwindled over decades, because Oklahoma City Zoning would not allow enough new house units to compensate for falling household size within the district. This pattern, seen nationally, means the abandonment of existing school buildings, but more importantly it means students have to travel further and further to school. 50 years ago most American students walked to school, now less than 10% do.
2. **Local businesses and property tax collection.** Local business depend on local shoppers. People living in these core neighborhoods are likely to spend a higher proportion of their money at locally owned businesses. These dollars have a higher multiplier effect, that is, they recirculate locally more times than money spent at non local businesses. Local business is also good for tourism and property values.
3. **Property tax collection** – Every housing units denied by OKC costs the Public over \$1000/ year in property tax collection, most of this is money would have gone to OKC public schools.
4. **Public Infrastructure** – blocking housing close to existing jobs and infrastructure necessitates people to live further away and thus more infrastructure and vehicle miles traveled per tax payer.
5. **Public Health** - which is bettered by more people living in walkable and socially active neighborhoods.
6. **Citizens making less than the Area Median Income.** Oklahoma City has banned multi-unit housing in 96% of residential land in the city, this de facto prohibition on rental housing means higher rents and less desirable locations for renters. Almost everywhere the city requires a lot of a least 6,000 SF to build a single housing unit. Lots of this size run over **\$60,000** even in cheaper portions of the UM area. Since developers cannot operate profitably selling a finished property for less than 5 times what they paid land, we have, by default, banned the construction of new homes selling for less than **\$300,000** throughout the UM, and nearly throughout nearly the entire city. Consider that at current interest rates and 10% down, ~\$270,000 is the most that a household making the Area Median income can afford without paying more than 30% of their income toward housing. This city's land use policies

¹ Examples included SPUD-1140 (January 19, 2028)

have apportioned 96% of the residential land for building housing for its richer half and 4% of the land for building housing for everyone.

7. **The Climate.** building housing in places with nearby services and jobs decreases emissions associated with driving and the construction and maintenance of public infrastructure

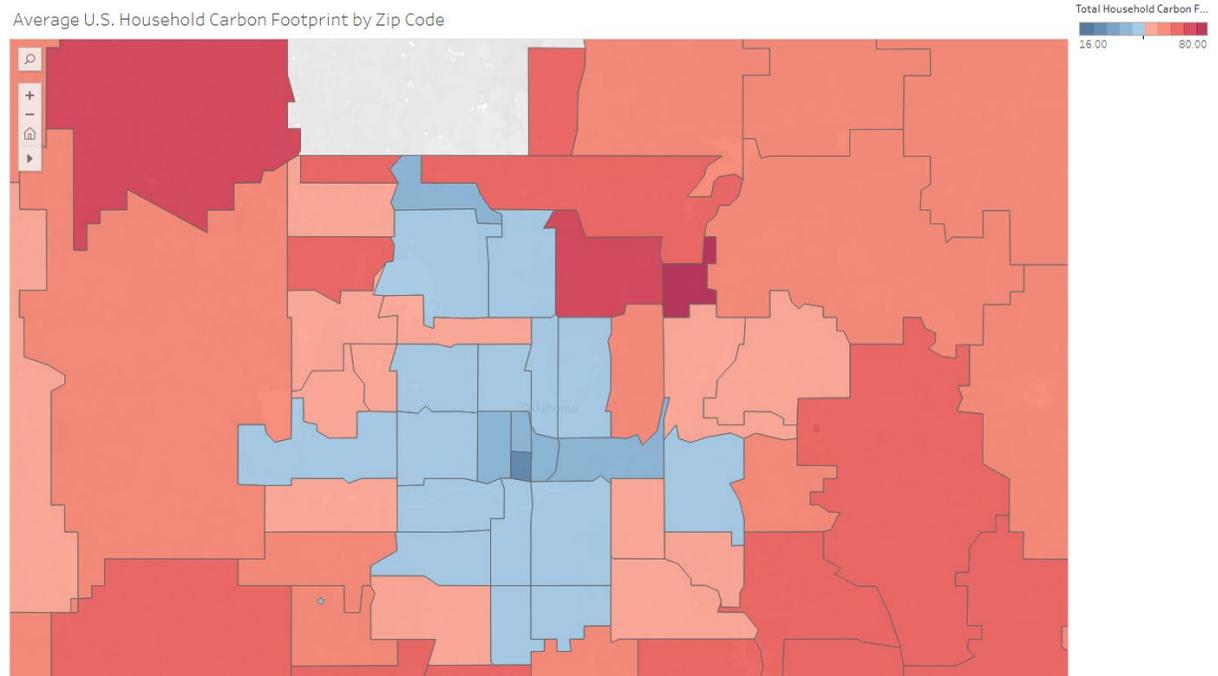


Figure 1 Household Carbon Emission by Zip Code in Oklahoma City.

Citizens advocating for these public interests rarely show up for Planning Commission meetings, they never come to neighborhood workshops and townhall to discuss the development code update.

It is the duty of the Planning staff and the commission to advocate for the public interest even though it does not align with the expressed desires of selection biased crowd of NIMBYs that show up every time someone proposes building anything near a wealthy neighborhood. We can already assume that Spud 1596 is likely to be approved and 1581 be differed, significantly modified or denied simply because the neighbors surrounding the latter location are wealthier, better organized, and assume (perhaps rightfully) that their voice has more weight with government than do the poorer residents on 17th street. As the organizing email sent to Jefferson Park residents stated: *Large Turnouts at these meetings have prove to be the single most impactful way to influence the commission.* To which I ask, why is the commission so easily influenced to vote against the public interest by wealthy groups representing less than .01% of the OKC populous?

Regarding Spud 1581:

The developable site here sits in LUTA Urban Medium, which is assigned a 10-40 unit/acre gross density by Plan OKC. The developable site is .48 acres, but to arrive at the allowable gross density, we should consider the site to extend to the centerline of adjacent right of ways.² Hudson is a 90' ROW, 30th is a 50' ROW. The Gross area of the site is 185 x 175' or .74 acres. Up to 29 units are allowed by the Comprehensive plan here. I have heard argued that we should not include existing right of ways and common areas in density calculations. Nonsense, should a new plats in the UM be allowed higher net density than an existing plats simply because they former are creating new right of ways? We should build density where we already have the infrastructure. The existing neighborhoods of Jefferson park and Edgemere currently have total gross densities less than the 10 Dus/acre floor established by the comprehensive plan, and this development (barely) moves the needle towards their conformance with Plan.

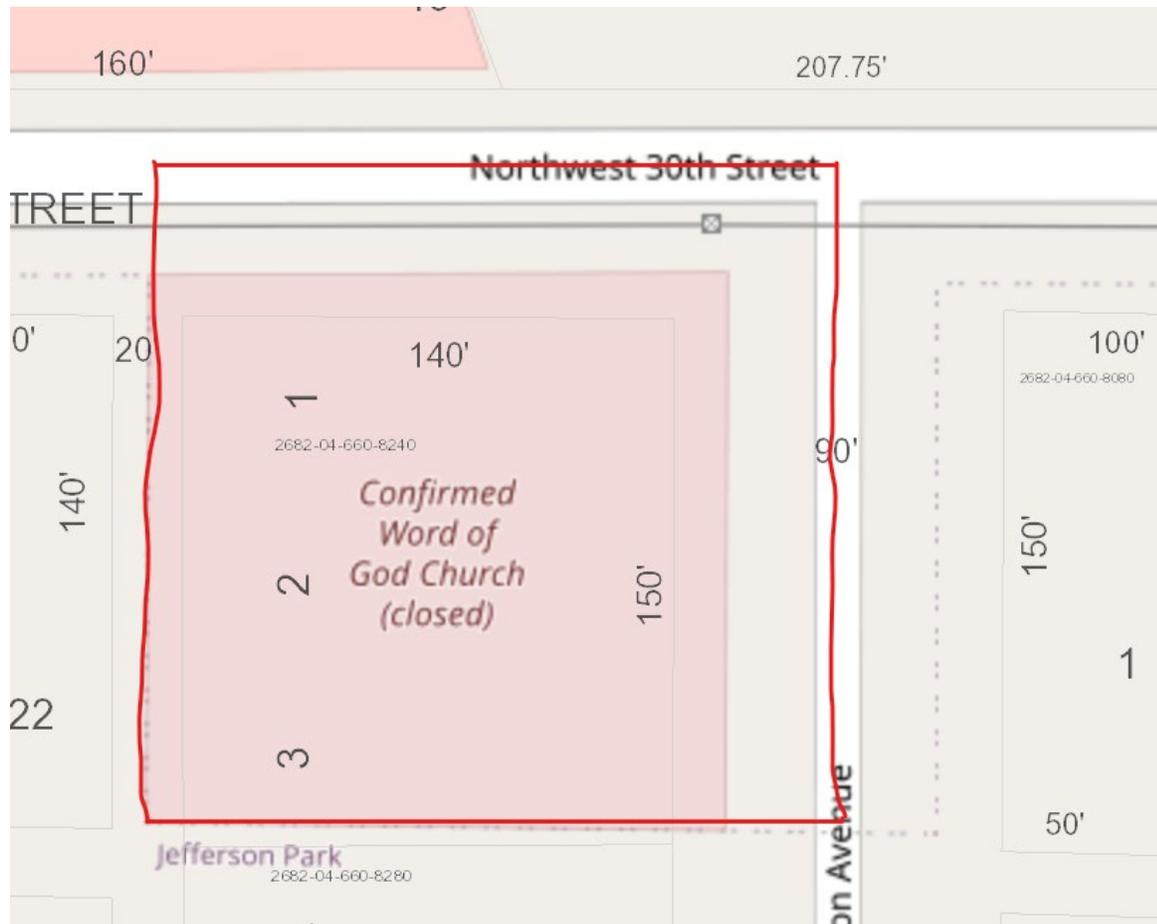


Figure 2 Site which should be considered for Gross density calculations

² "Densities shown in the LUTA descriptions are expressed in gross terms unless otherwise indicated. Gross density is the sum of all residential units divided by the entire site area including all common areas, rights-of-way, etc. and is expressed in dwelling units per acre." – Page 50 Plan OKC

The site at 30th and Hudson is ideal for a multifamily development such as this and the public should not be deprived of the benefits it would include. My only concern here is for the neighbor directly south of the development. The parking lot should be required to include a 5' landscape buffer on its south edge planted with trees every 25'. The parking lot should be screened from Hudson as well, and no parking lot lighting should be over 10'-0" above ground or 1500 lumens. I would also recommend that the site be required to be at least 40% permeable in order to nudge the developer towards a more attractive parking strategy.

Regarding Spud 1596:

Again, I support this development next door to me with the following considerations.

1. Setbacks.

1.1 Front (north) setbacks (not including porches) should be 30'-0" to match the existing pattern on the south side of street. If the commission allows a smaller setback it prevents neighbors sitting on their front porches from seeing one another on the same side of the street. Such is the case for SPUD-930, this building was allowed a 20'-0" setback, and it now blocks me from seeing and conversing with my neighbor AJ when we are both sitting on our porches. Infill buildings (corner lots excepted) should maintain the existing street wall, if a 25'-0" set back is allowed here my porch will have blinders on both sides.

1.2 Side setbacks. The grain of 17th street is established so that driveways occupy the north side of each lot and each house is setback 10-15 feet from the north property line and 3-5 feet from the south property line. This 13'-20' separation between houses allows for many east and west facing windows without too much concern for privacy or lack of light. My home has nine windows on its west facade, 3 feet north of the property in question. In order to strike a compromise between maintaining the original grain of the neighborhood and accommodating additional density, I think the north setback could reasonably be set at 8'-0". However, to ensure that the west facing windows of my house maintain at least some daylighting, I request that the set back plane sloping inward at 45-degree angle begin at 22'-0" (approximate 2 stories) above the ground plane and continue to the maximum building height of 35'. A side setback is less critical on the south property line since the homes to the south are set back 14' feet off the line. Still, to avoid subjecting the residents there to a massive blank facade, the project should be limited to 600 SF of exterior wall built from 0'-5' of the property line, and the remainder of the building setback at least 5' to allow for some windows or articulation at the very least. In lieu of the setback plane I would consider a requirement that the material on the west facade maintain a light reflectance value of 75 or greater.

1.3 Parking Buffer. Beginning 20' North of the rear property line. I request a 5'-0" buffer from a parking lot or driving surfaces. The buffer should be planted with irrigated, medium to large trees no more than 25'-0" on center. If all parking stalls are accessed directly from the alley, then I do not think such a buffer is required

2. Density.

1.1 The proposal would be within the 10-40 units per acre are permitted in the urban medium LULA, but I think the proposed density, in of itself, is completely appropriate here. However, I am becoming increasingly concerned about developers demolishing rather affordable family oriented housing and replacing it solely with one beds and studio apartments targeted at one or two person households. In the last few years the family homes at 1612 NW 17th and 1625 NW 16th were both demolished to make way for more expensive, but smaller units. The last thing I want is the slow disappearance of children and families from 17th street. Furthermore, this case sets a precedent that might engender the demolition of many of the existing homes in the neighborhood, the vast majority of which are worth less than this developer paid for this property. If land is really worth \$30,000 per develop-able unit here on 17th street (as is suggested by the developer's three separate purchases of 1612 NW 17th St, 1616 NW 17th Street, and 1612 NW 17th ST) then allowing eight units per city lot makes lots worth \$240,000. This is more than the Zillow estimates for most homes in the neighborhood. I think we should approve this SPUD, but be mindful of this in the future.

3. Parking. No more than 4 spaces should be required. Ideally this development can be parked directly off the alley so that it can maintain a landscaped backyard whose trees would be a greater amenity to the neighborhood than a parking lot would be

4: The site should be at least 40% permeable.

Thank you for your consideration,

Sam Day

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