

March 24, 2022

City of Oklahoma City  
Development Services Department  
420 W. Main Street, 9<sup>th</sup> Floor  
Oklahoma City, OK 73102

Attention: Mr. Jared Martin

**RE: The Wheeler District: Request for Docketing**

Dear Jared:

On behalf of our client, Wheeler District, LLC, we are submitting a request to vary section 3.4.1.A of the Oklahoma City Subdivision Regulations to allow for the continued development of the Wheeler District. This portion of the subdivision regulations prevents a property owner from splitting off multiple pieces of property within platting. The intent is to ensure an orderly subdivision of land with adequate access and infrastructure. All of this information for the Wheeler District has been previously submitted and approved. This request is necessary as the development is seeking approval of six lot splits currently filed with the City of Oklahoma City on a currently platted portion of the development. In an effort to allow for future flexibility, Phase 1 and Phase 2 of the Wheeler District reserved portions of the property as larger lots until final development plans were completed. However, all of the infrastructure (streets, alleys, water, sanitary and storm sewer lines) were all installed leaving a development ready site. This flexibility was sought to respond to changing market conditions. The Wheeler "Shop Homes" have been a very popular product which is a live/work unit. These units are proposed for a portion of this request. In discussions with the City Staff, it became clear that the flexibility sought in the initial filing of the plat did not exist as originally anticipated. Due to that, we are requesting a variance to Oklahoma City Subdivision Regulations for the remaining lots to allow for their development.

This request is specific to the Phase 1 (Block 17, Lot 8) and Phase 2 of the Wheeler District Development. The request and reasonings are outlined below:

1. Platting is typically required for the subdivision of land into more than three parcels to allow for proper planning and dedication of public infrastructure. This process prevents conflicts with future landowners and provides the City certain assurances in regards to utilities, roadways, access, drainage, easements and many other necessities. In this case, the application of this section is not necessary. The previously approved Wheeler District Final Plats provided for all these items and conditions. It was always envisioned that the lots in questions would be fully developed but rather than putting lot lines that would need to be moved or adjusted, large lots were created. Ultimately, this decision created the need for this variance request.
2. As part of Phase 1 and Phase 2, all the public/private infrastructure has been installed to City standards. If approved, these newly created lots will be fully accessible by all the necessary infrastructure. This makes this a particularly unique request. In many cases, lot splits are sought on properties intended for a single home or commercial users and splits are later sought that likely need public water or sewer extensions. This is not the case for Wheeler.
3. Allowing this variance simply permits for the previously planned type of development to occur. If this variance was denied, the developer would need to file a re-plat for every existing platted lot to subdivide. This process involves a review of existing conditions, a hearing by the Planning Commission and ultimately acceptance by the City Council. This is a lengthy process that ultimately results in the exact same outcome as the proposed lot splits.

**Jared Martin**

**RE: The Wheeler District: Request for Docketing**

**March 24, 2022**

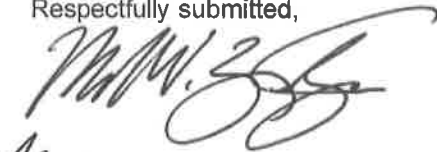
**Page 2**

---

4. This request for a variance is to the number of lots that can be created through the administrative lot split process. The lots sought to be created are in conformance with the previously approved plat. These tracts of land were always intended for subdivision.
5. It is not uncommon for a unique project like the Wheeler District seek special accommodations as the Subdivision Regulations did not anticipate a development like this to occur. This was the reason for a PUD and why many Cities (currently the City of Oklahoma City) have or are in the process of updating their development codes.
6. This process and this request will be the only one needed for Wheeler District. As we work to complete the development plans for Phase 3 of the Wheeler District, remedies are being discussed with staff to prevent this from needing to occur in the future.
7. With the approval of this variance, no negative extraneities will be created for the City, the District, or the neighbors. These are fully serviced lots that always had the intention of development.

Please place this final plat and requested variances on the Planning Commission docket for **April 7, 2022**. Should you have any questions or comments, please feel free to contact this office.

Respectfully submitted,



Timothy W. Johnson, P.E.  
**JOHNSON & ASSOCIATES**

TWJ/rw

Attachment(s)

cc: Mark W. Zitzow, AICP, Johnson & Associates  
[4371 000 / PA]



**Wheeler District**  
 Lot Split Variance Request