

## PUD-1917 – FORMAL OPPOSITION PROTEST

Kayla Kuri

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Edmond, OK 73013

### Oklahoma City Planning Commission

420 W. Main Street, Suite 900  
Oklahoma City, OK 73102

Dear Commissioners,

I have received notice of a PUD application (the "**Proposed PUD**") submitted by Sitelab Land Partners LLC ("**Sitelab**") for a development located at 5500 NW 164<sup>th</sup> Street (the "**PUD Site**") under Case No. PUD-1917. I serve as the President of Monarch Ridge HOA, Inc., the homeowner's association for the residents of the Monarch Ridge neighborhood ("**Monarch Ridge**"). Monarch Ridge is a 67-home single-family residential neighborhood located directly to the east of the PUD Site. On behalf of Monarch Ridge HOA, Inc. and the residents of Monarch Ridge, I hereby submit this letter in formal opposition to the Proposed PUD as in its current form. The rationale for this objection is set forth as follows:

#### The Objectives of a PUD; Consistency with Existing Developments

§ 59-14100.2 of the Oklahoma City Municipal Code provides that a PUD shall achieve the following objectives:

1. **Minimize adverse effects upon surrounding property, the character of the neighborhood, traffic conditions, parking, utilities or any other matters affecting the public health, safety and general welfare.**
2. Contribute to the revitalization and/or redevelopment of areas where decline of any type has occurred.
3. Promote infill development that is **compatible and harmonious** with adjacent uses, both existing and planned.
4. Maintain consistency with the City's comprehensive plan, this [Oklahoma City Municipal Code], and other applicable plans, policies, standards and regulations.
5. Provide development that contributes more to the **general prosperity, health, safety and welfare of the community** than would otherwise be provided through the standard development process.

The Proposed PUD, as designed, does not achieve these objectives. The PUD Site is located directly to the west of Monarch Ridge and to the north and east of a residential subdivision called "Still Meadows". To the north of the Proposed PUD, there is vacant, undeveloped land. Monarch Ridge consists of approximately **20 acres** and has **67 predominantly one-story single-family homes**, having a density of **3.35 dwellings per acre**. Still Meadows consists of approximately **115 acres** and has approximately **315 homes** (both single and two-story), having a density of **2.7 dwellings per acre**. Both Monarch Ridge and Still Meadows, as well as the directly adjacent Lone Oak Subdivisions fall within the **R-1** zoning classification. In contrast, the Proposed PUD is for a R1-ZL zoning district and reflects **140 residential lots within 20 acres** of land, thus resulting in a density of **7 dwellings per acre** within the PUD Site. § 59-14200.4(A) of the Oklahoma City Municipal Code requires that a PUD be allocated in a manner, or at a scale, **that is compatible with the existing, established adjacent developed neighborhoods**. However, the density of homes in the Proposed PUD is more than **double** that of its neighboring developments, Monarch Ridge and Still Meadows. § 59-14200.4(D)(1)(a) of the Oklahoma City Municipal Code requires that a PUD complement **existing development on adjacent properties by similar placement and proportion**. Not only are the 2,500 sq. ft. lots reflected in the Proposed PUD **almost half of the size** required by R1-ZL zoning districts (4,000 sq. ft.), but they are **not even half of the size** of the smallest lots (6,000 sq. ft.) in the neighboring subdivisions.

Further, the Proposed PUD is in a rural area of Oklahoma City; so rural in fact that the land located directly north of 164<sup>th</sup> street is entirely undeveloped. A high-density residential development, like the one in the Proposed PUD, would deviate greatly from the characteristics of the surrounding developments and the vacant land located directly north of the PUD Site. 164<sup>th</sup> Street has not experienced decline of any type; in fact, it has seen tremendous growth in the last decade. The development of a residential neighborhood is completely in line with the type of development seen along 164<sup>th</sup> Street, but development of a neighborhood with the density levels shown in the Proposed PUD would not be. **The Proposed PUD does not promote infill development that is compatible and harmonious with adjacent uses, both existing and planned, and the Proposed PUD does not contribute to the general prosperity, health, safety and welfare of the community to any extent greater than a standard R1-ZL or R-1 neighborhood would.**

#### Appropriate Uses of a PUD

§ 59-14100.3(A) of the Oklahoma City Municipal Code provides that a PUD is used appropriately when flexibility is required that is not allowed under the zoning code in return for a coordinated development that provides greater public benefits, and § 59-14100.3(B) provides that a PUD is not to be used to circumvent policies or to be used in lieu of seeking variances to regulations. For the reasons set forth above, the neighborhood reflected in the Proposed PUD is not a coordinated development that provides greater public benefits; rather, it is inconsistent with neighboring developments and provides no benefit to the general public. The neighborhood reflected on the Proposed PUD does include an "Amenity Center"; however, there is no reference to what this facility is, what it contains, or who would receive the benefit of it. The Proposed PUD reflects various deviations from the Zoning and Planning Code and the Subdivision Regulations; rather than seek approval for each of these variances, Sitelab has opted to use the PUD process to bypass seeking individual variance approvals. This is an inappropriate use of the PUD process under § 59-14100.3(B) of the Oklahoma City Municipal Code.

#### Missing Elements

The Proposed PUD is missing multiple elements which are required under § 59-14100.3 of the Oklahoma City Municipal Code. These elements are itemized and set forth on **Attachment A**, attached hereto and made a part hereof.

#### Zoning Classification

The Proposed PUD states that the PUD Site is currently zoned as an AA Agricultural District. However, only part of the PUD Site is zoned as AA, **with approximately 5 acres along the eastern boundary being zoned as R-1**. See **Attachment E**. An open records request has been made to the City of Oklahoma for the re-zoning application for Monarch Ridge, but we believe it is very likely that the additional area outside of the Monarch Ridge neighborhood (and within the PUD site) was **intentionally zoned R-1 to ensure compatibility of the neighborhood with Monarch Ridge** (and we believe the requested documentation will show that intent). Not only does the Proposed PUD wrongfully classify the zoning of the PUD Site, but it fails to account for the fact that approximately 25% (or 5 acres of the 20 acre PUD Site) is currently zoned R-1; the same zoning as neighboring subdivisions Monarch Ridge and Still Meadows.

#### Violation of Rule Against Double Frontage Lots

**Section 5.2.4** of the Oklahoma City Subdivision Regulations provides that "through" or "double frontage" lots shall be avoided except where necessary to provide separation of residential development from traffic arterials to overcome disadvantages of topography or orientation. Of the 140 proposed lots within the PUD Site, 80 lots indicate through their planning that they are "double frontage" lots.

#### Reduction of Lot Size

The Proposed PUD is requesting a reduction of the R1-ZL minimum lot areas as established by the Oklahoma City Municipal Code **Table 6100.2** from **4,000 sq. ft.** to **2,500 sq. ft.** and a reduction in minimum

lot width from **40' (50' Corner) to 25' minimum**. These reductions from minimums will result in **extremely narrow lots and allow for a very limited number of design planning options and will be incompatible with established existing context**. Even with variation in lot scale, only 7 of the proposed 140 lots meet even the City's minimum lot requirement of 40'x100'. Please see **Attachment B** for graphical information further illustrating this point.

Additionally, with the Proposed PUD reducing the front yard setback from 25' to 15', it is at variance with **Section 10250.8** of the Oklahoma City Municipal Code which requires that single family structures have a **minimum paved area of 8.5'x18' (15'<18')** adjacent to the structure to comply with adopted parking area construction standards.

### Safety Risk

With the Proposed PUD using R1-ZL as the basis of design, **2015 International Residential Code Chapter R302.1(1)** requires any structure placed along a property line adhere to a **two-way 1-hour rating of the entire wall assembly**. Additionally, **no openings in walls (windows/doors) are allowed within 3 feet of property line**. This will significantly impact the design planning as it will **require an entire side of a home to become a completely blank wall** as it sits along the property line. Without these provisions in place, it will create a grave fire danger risk for the development and surrounding areas. No reference to these standards is given within the proposed PUD. This has been confirmed through conversations with the City of OKC Fire Protection Specialist. See **Attachment C and D** for additional information.

With the removal of any openings along the fire wall, **any bedrooms located along said wall will not have windows, therefore they will not achieve the required 2 means of egress out of every habitable space per 2015 IRC R310 and R311**. The review of these plans in detail is crucial for compliance prior to construction.

In addition to the safety risks outlined above, the Proposed PUD reflects a connection to Monarch Ridge through N.W. 163<sup>rd</sup> Terrace. The residents of Monarch Ridge are greatly concerned about this connection since the community playground is directly northeast of such street. **There are many children that reside in Monarch Ridge and that use the community playground, and increased traffic volume in that area would create a safety concern**. The residents of Monarch Ridge would like to request that the Planning Commission consider vacating N.W. 163<sup>rd</sup> Terrace and creating a bike path instead, or alternatively, installing speed bumps along Monarch Field Road to reduce safety issues caused by increased traffic and potential speeding.

### Street Plan

The Proposed PUD has an extremely rigid and straight plan. This often leads to higher speeds throughout the neighborhood and can create unsafe conditions, especially for children. This is at variance with the approved **Oklahoma City Subdivision Regulations Article III (D)(1)(d)** where a **rigid rectangular gridiron road pattern is discouraged**. Further, this site development layout, as conceptually demonstrated, shows little to no recognition or appreciation of the existing natural topography of the proposed site. This is directly at variance with **§59-14100.1(C)**. The Proposed PUD should be redesigned to add relief within its circulation corridors around the site to decrease this effect.

### Increased Traffic

The Proposed PUD will require a Traffic Impact Analysis ("TIA") to be completed to conform to the re-zoning application which requires such a study on a site that is projected to **create 100 or more residential lots per Article V Appendix D (B)(1)(a)(5)** of the Oklahoma City Subdivision Regulations. There are **multiple housing developments along 164<sup>th</sup> Street**, including an elementary school, and a new housing development is being built along 164<sup>th</sup> Street near Portland Avenue. The addition of another development along 164<sup>th</sup> Street, especially one at this density, would greatly increase the traffic along 164<sup>th</sup> Street which

is already often overburdened. We request that the City of Oklahoma City consider widening 164<sup>th</sup> Street to accommodate the new developments and increased traffic in accordance with the results of the TIA.

#### Drainage Issues

Monarch Ridge has suffered from significant stormwater runoff issues along its western boundary, even while the PUD Site remained undeveloped. Considering this, the Proposed PUD will require a stormwater drainage plan to be produced by a qualified third party to determine the impact of any runoff from the PUD Site to adjacent established sites and represent conditions relating to 2-, 10-, 25-, and 100-year frequency storm. Per **Article III Section 5 (A)(2)(e)** of the Oklahoma City Zoning Regulations, the proposed development within the PUD Site shall not result in additional identifiable adverse flooding and erosion on other property, including Monarch Ridge, or anyone further downstream. We request that Sitelab commission qualified parties to perform all drainage studies necessary to ensure that no adverse conditions are created on any Monarch Ridge's resident's home during and after the initial construction phases through the ultimate completion of the subdivision. **If the drainage study concludes that adverse effects are unavoidable, the PUD must be rejected per OKC Subdivision Regulations Art III Sect 5(A)(1)(a).**

The residents of Monarch Ridge have always anticipated a future residential development on the proposed PUD Site and are excited about such a possibility. **However, we would like to ensure that all minimum established codes and regulations are met within the new development so that both neighborhoods can achieve their maximum potential.** With the adjacency and possible shared drive, our two neighborhoods will be entwined both literally and figuratively, so we ask that we make the future development as safe, harmonious, and congruent as possible.

We consider all these issues critical to the impact of the proposed PUD and surrounding existing neighborhoods. We respectfully submit 34 signatures, representing 32 homes (48%) within our neighborhood, to this document to illustrate our unified protest position within this matter. See **Attachment F**.

Sincerely,

**Kayla Kuri**

President of Monarch Ridge HOA, Inc.

#### **Enclosures:**

Attachment A – Missing Elements within PUD Application

Attachment B – Lot Reduction Planning Impact

Attachment C – IRC 2015 R302.1(1) Fire-Resistant Construction / Exterior Walls

Attachment D – Correspondence with Mike Willson (OKC Fire Protection Specialist)

Attachment E – Zoning Classification

Attachment F – Formal Petition Signatures

## **ATTACHMENT A**

### **Missing Elements within PUD Application**

1. Proposed PUD is missing the following elements which are required under **§59-14150(B) of the Oklahoma City Municipal Code**:
  - a. Contact information for the owner and developer (including e-mail addresses) (**§59- 14150(B)(1)(a)(2)**)
  - b. A legal description of the land subject to the PUD (**§59-14150(B)(1)(a)(5)**)
  - c. A table setting the minimum and maximum total dwelling units and non-residential square footage, and the minimum acreage for common open space, natural resource areas, public uses, and any other planned uses. (**§59-14150(B)(1)(a)(7)**)
  - d. A description of the elevation, slope analysis, soil characteristics and tree cover characteristics of the PUD Site (**§59-14150(B)(1)(a)(11)**)
  - e. Drainage information describing the basic stormwater management methods for the PUD Site (**§59-14150(B)(1)(a)(12)**)
  - f. A statement specifying the number, type, height, and display area of signs within the PUD Site (**§59-14150(B)(1)(a)(14)**)
  - g. A description of lighting for the development (**§59-14150(B)(1)(a)(15)**)
  - h. A statement describing the guarantees and assurances to be provided for the perpetual maintenance of common open space, drainage areas, recreation areas, sidewalks, parking, private streets, and other privately owned but common facilities serving the PUD Site (**§59- 14150(B)(1)(a)(19)**)

## ATTACHMENT B Lot Reduction Planning Impact

Per PUD-1917, page 5

### 9.14 ..... SETBACK REGULATIONS

Front: 15 feet  
 Side: 0 feet from one interior lot line and 10 feet from the opposite line  
 Corner Side: 10 feet  
 Rear: 10 feet

### 9.15 ..... LOT SIZE REGULATIONS

Lot sizes within this PUD shall be a minimum of 2,500 square feet.

## Per Oklahoma City Municipal Code

TABLE 6100.2: AGRICULTURAL AND RESIDENTIAL ZONING DISTRICTS BULK STANDARDS	
BULK STANDARDS	R-1ZL <sup>1, 10</sup>
Minimum Lot Size	4,000 sf
Maximum Lot Coverage	—
Density	1du/4,000 sf
Minimum Lot Width	Single-Family: 40 ft Single-Family Corner Lots: 50 ft Other: 100 ft
Maximum Height <sup>5, 6</sup>	2½ stories or 35 ft
YARDS (Additional applicable yard regulations are found in Section 59-12100.3)	
Front Yard	25 ft <sup>8</sup>
Side Yard	Single-Family: Zero ft from one interior lot line and 10 ft from opposite line Corner Side Yards: 10 ft
Rear Yard	10 ft

# ATTACHMENT B, cont. Lot Reduction Planning Impact

Per PUD-1917, page 6



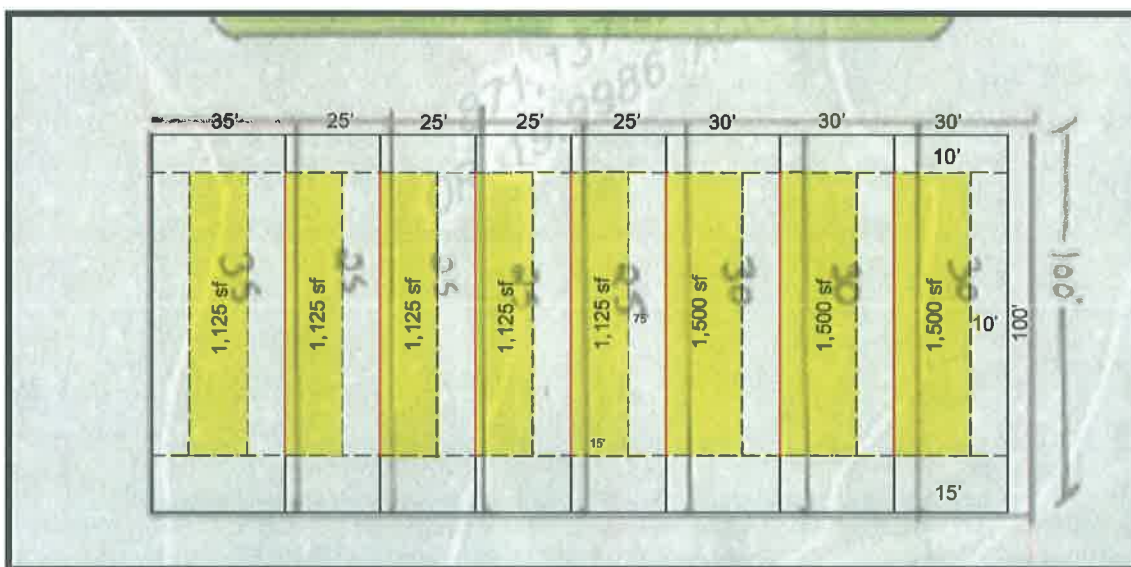
1"=400'

See Plan Below for Detail of Typical Block

## PUD 1917 - Lot Plan Detail

Buildable Lot Area:  
25' x 100' Lot - 1,125 sf (15'x75')  
30' x 100' Lot - 1,500 sf (20'x75')  
\*35' x 100' Lot - 1,125 sf (15'x75')

\* May vary due to final setback requirements

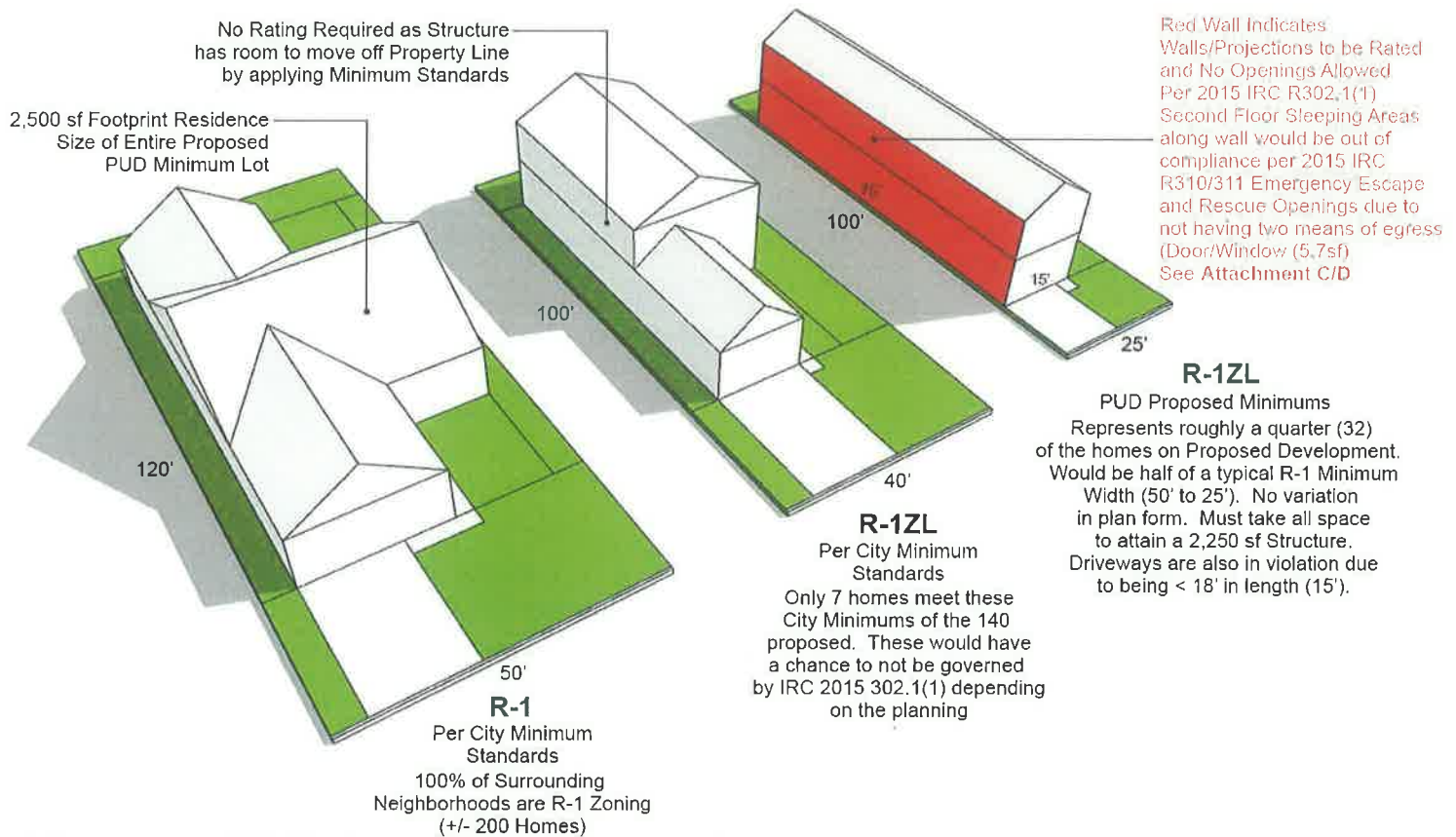


Red indicates where Structure sits directly on Property Line and is thus subject to IRC 2015 Table R302.1(1) Exterior Wall Fire Rated Assemblies and No Projections or Openings (Windows/Doors) Allowed

1"=50'



## ATTACHMENT B, cont. Lot Reduction Planning Impact



Red indicates where Structure sits directly on Property Line and is thus subject to IRC 2015 Table R302.1(1) Exterior Wall Fire Rated Assemblies and No Projections or Openings Allowed

**Proposed PUD Development**



## ATTACHMENT C

### IRC 2015 R302.1 Fire-Resistant Construction / Exterior Walls

<https://codes.iccsafe.org/s/IRC2015/chapter-3-building-planning/IRC2015-Pt03-Ch03-SecR302.1>

#### R302.1 Exterior walls.

Construction, projections, openings and penetrations of exterior walls of dwellings and accessory buildings shall comply with Table R302.1(1); or dwellings equipped throughout with an automatic sprinkler system installed in accordance with Section P2904 shall comply with Table R302.1(2).

##### Exceptions:

- 1 Walls, projections, openings or penetrations in walls perpendicular to the line used to determine the fire separation distance.
- 2 Walls of dwellings and accessory structures located on the same lot.
- 3 Detached tool sheds and storage sheds, playhouses and similar structures exempted from permits are not required to provide wall protection based on location on the lot. Projections beyond the exterior wall shall not extend over the lot line.
- 4 Detached garages accessory to a dwelling located within 2 feet (610 mm) of a lot line are permitted to have roof eave projections not exceeding 4 inches (102 mm).
- 5 Foundation vents installed in compliance with this code are permitted.

✦ This section provides details for issues related to building location on the property, including the fire rating of exterior walls, permitted openings and projections. Tables R302.1(1) and R302.1(2) provide a tabular overview of the requirements of this section.

Concerning exterior wall protection, the code assumes that an owner has no control over an adjoining property. Thus, the location of buildings on the owner's property relative to the property line requires regulation. In addition, Section R302.6, which lists the separation requirements for garages and carports, specifically requires garages located less than 3 feet (914 mm) from a dwelling unit on the same lot to have not less than 1/2-inch (12.7 mm) gypsum board applied to the interior side of the walls. Opening protection for these walls is regulated by Section R302.5.

The property line concept is a convenient means of protecting one building from another as far as exposure is concerned. Exposure is the potential for heat to be transmitted from one building to another during a fire in the exposing building. Radiation is the primary means of heat transfer.

Table R302.1(1) specifies the exterior wall elements, fire separation distance and fire-resistance rating for dwellings without sprinkler systems. Walls less than 6 feet (1525 mm) from the property line must be of 1-hour fire-resistant construction. The fire-resistance rating also requires the rating exposure to be for both sides. The exterior rated walls are required to be an assembly that has been tested in accordance with either ASTM E119 or UL 263. This is not intended to limit fire-resistance-rated assemblies solely to the test criteria contained in these standards. Section R104.11 still allows the building official to approve alternative fire-resistance methodologies, such as those described in Section 703.3 of the IBC. This would still allow a builder to use acceptable engineering analysis, calculations in accordance with Section 721 of the IBC or prescriptive assemblies permitted by Section 720 of the IBC as alternatives to the standards contained within the code.

Projections cannot be closer than 2 feet (610 mm) from the lot line. Projections that have a fire separation distance of less than 5 feet (1525 mm) from the lot line in unsprinklered buildings, or less than 3 feet in sprinklered buildings, are required to be protected on the underside with 1-hour fire-resistant construction in accordance with Tables R302.1(1) and R302.1(2), respectively [see Commentary Figure R302.1(1)]. Footnotes to the tables allow the underside protection to be omitted where fireblocking is provided or gable vents openings are not present.

Unlike the IBC, the code does not set a distance from the property line at which openings must be protected. Openings are not permitted in exterior walls where the exterior wall has a fire separation distance of less than 3 feet (914 mm) from the lot line. Openings in a wall with a fire separation distance that is equal to or greater than 3 feet (914 mm), but less than 5 feet (1525 mm) from the lot line, cannot exceed 25 percent of the maximum wall area [see Commentary Figures R302.1(2) and R302.1(3)]. The consensus as to the minimum distance necessary to provide a sufficient buffer against the spread of fire has changed somewhat over the years. For example, the 2000 and 2003 editions of the IRC required a 3-foot (914 mm) minimum fire separation distance for unrated exterior walls. In the 2006 edition, that distance was increased to 5 feet (1525 mm) to provide a higher level of safety and to correlate with the provisions for residential occupancies regulated by the IBC. The 2009 IRC introduced requirements for automatic fire sprinkler systems in all new one- and two-family dwellings and townhouses. Table R302.1(2) permits nonrated walls that have a 3-foot (914 mm) minimum fire separation distance, a dimension previously prescribed in earlier editions of the code. The 3-foot (914 mm) dimension specified in Table R302.1(2) is the new threshold for exterior wall construction, projections, openings and penetrations for dwellings that are sprinklered in accordance with Section P2904 or NFPA 13D. For dwellings without sprinkler systems, the 5-foot (1525 mm) separation distance still applies.

The reduced clearances are intended to provide design flexibility and reduce costs associated with fire-resistant construction, while maintaining a reasonable level of safety based on past performance of dwelling fire sprinkler systems. A dwelling automatic sprinkler system installed in accordance with Section P2904 or NFPA 13D aids in the detection and control of fires in residential occupancies regulated by the IRC. The design criteria of these sprinkler systems are for life safety to buy time for occupants to escape a fire; dwelling fire sprinklers are not designed for property protection. Sprinklers in accordance with Section P2904 or NFPA 13D are not required throughout the dwelling; they generally may be omitted in concealed spaces, closets, bathrooms, garages, and attics and crawl spaces without gas-fired appliances, for example. However, the automatic sprinkler system is expected to prevent total fire involvement (flashover) in the room of fire origin if the room is sprinklered. In addition to increasing the likelihood of occupants escaping or being evacuated, sprinklers often provide some measure of property protection as well.

Note a to Table R302.1(2) allows exterior walls in subdivisions where all dwellings are equipped with sprinkler systems to be placed on the lot line if the adjacent lot maintains a 6-foot (1829 mm) setback for buildings on the opposite side of the lot line. This provision allows flexibility in placing buildings on the lot for maximum effective use of the buildable area while still maintaining a minimum 6 feet (1829 mm) of clearance between buildings. Commentary Figure R302.1 summarizes the fire separation distance requirements for exterior walls that are not fire-resistance rated.

Exception 1 permits walls, openings, projections or penetrations that are 90 degrees (1.57 rad) (perpendicular) to the line used to determine the fire separation distance to be exempt from the requirements of Tables R302.1(1) and R302.1(2). Section R302.4 describes through penetrations and membrane penetrations in detail (see the definition of "Fire separation distance" in Chapter 2) [see Commentary Figures R302.1(2) and R302.1(3)].

Exception 2 allows dwellings and accessory structures, on the same lot, to be considered one building such that the requirements of Tables R302.1(1) and R302.1(2) will not apply to the exterior walls facing each other. This exception eliminates the imaginary line between two buildings on the lot when measuring the fire separation distance. Tables R302.1(1) and R302.1(2) will apply to the other exterior walls of the buildings.

Exception 3 applies to detached tool and storage sheds, playhouses and similar structures that are exempt from permits. Projections from these structures, however, are not permitted to extend over the property line.

Exception 4 will allow roof eave projection for detached garages to be closer than 2 feet (610 mm) from the lot line, but limits the roof eave projection to 4 inches (102 mm). This projection cannot extend over the property line.

Exception 5 allows foundation vents installed in compliance with the code in areas where openings are otherwise prohibited.

\*Exterior Wall Elements must be rated if within 3' of the Property Line Minimum as Defined By OKC Supplemental Residential Code. See Attachment D for more information.

\*Projections must be rated if within 3' of the Property Line Minimum as Defined By OKC Supplemental Residential Code. See Attachment D for more information.

# ATTACHMENT C, cont.

## IRC 2015 R302.1 Fire-Resistant Construction / Exterior Walls

<https://codes.iccsafe.org/s/IRC2015/chapter-3-building-planning/IRC2015-Pt03-Ch03-SecR302.1>

\*Exterior Wall Elements must be rated if within 3' of the Property Line Minimum as Defined By OKC Supplemental Residential Code See Attachment D for more information

TABLE R302.1(1) EXTERIOR WALLS

EXTERIOR WALL ELEMENT		MINIMUM FIRE-RESISTANCE RATING	MINIMUM FIRE SEPARATION DISTANCE
Walls	Fire-resistance rated	1 hour—tested in accordance with ASTM E119 or UL 263 with exposure from both sides	≤ 5 feet < 3'
	Not fire-resistance rated	0 hours	≥ 5 feet
Projections	Not allowed	N/A	< 2 feet
	Fire-resistance rated	1 hour on the underside <sup>a, b</sup>	≥ 2 feet to ≤ 5 feet < 3'
Openings in walls	Not fire-resistance rated	0 hours	≥ 5 feet
	Not allowed	N/A	< 3 feet
	25% maximum of wall area	0 hours	3 feet
Penetrations	Unlimited	0 hours	5 feet
	All	Comply with Section R302.4	< 3 feet
		None required	3 feet

For SI: 1 foot = 304.8 mm.

N/A = Not Applicable.

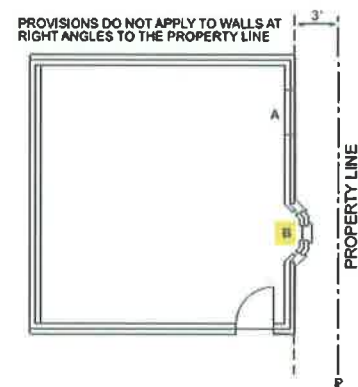
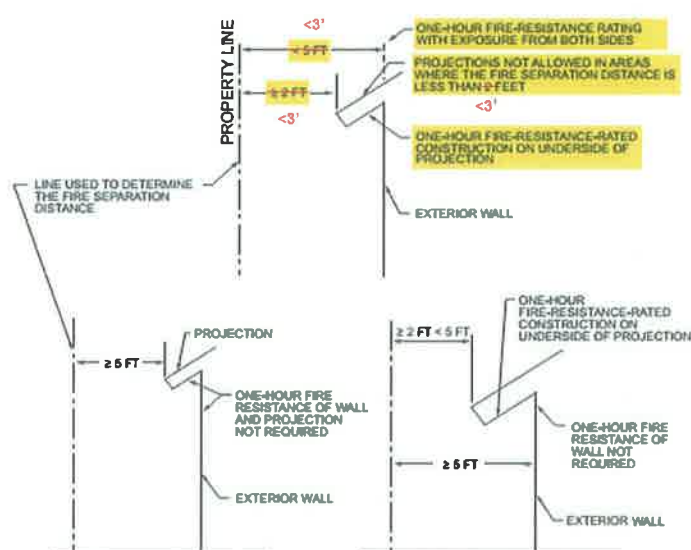
- a. Roof eave fire-resistance rating shall be permitted to be reduced to 0 hours on the underside of the eave if fireblocking is provided from the wall top plate to the underside of the roof sheathing.  
b. Roof eave fire-resistance rating shall be permitted to be reduced to 0 hours on the underside of the eave provided that gable vent openings are not installed.

\*Projections must be rated if within 3' of the Property Line Minimum as Defined By OKC Supplemental Residential Code See Attachment D for more information

Figure R302.1(3)

### EXTERIOR WALL FIRE-RESISTANCE-RATED REQUIREMENTS AND PROHIBITED OPENINGS FOR DWELLINGS WITHOUT AUTOMATIC SPRINKLER SYSTEMS

EXTERIOR WALL ELEMENT (Not fire-resistance rated)	MINIMUM FIRE SEPARATION DISTANCE		
	Without Sprinkler System	With Sprinkler System	With Sprinkler System in all Dwellings of Subdivision and 6-foot Setback for Building on Adjoining Lot
Walls	≤ 5 feet < 3'	3 feet	0 feet
Projections	≤ 5 feet < 3'	3 feet	0 feet
Unlimited openings in walls	5 feet	3 feet	0 feet
Penetrations (no restrictions)	3 feet	3 feet	0 feet



THE WINDOW LABELED A IN THE PLAN IS ACCEPTABLE BECAUSE THE EXTERIOR WALL IS 3 FT OR MORE FROM THE PROPERTY LINE. THE BAY WINDOW LABELED B WOULD NOT BE ACCEPTABLE BECAUSE IT HAS A FIRE SEPARATION DISTANCE OF LESS THAN 3 FEET. THE EXTERIOR WALLS ADJACENT TO THE PROPERTY LINE WOULD NOT BE REQUIRED TO BE FIRE-RESISTANT RATED EXCEPT FOR THE PORTION THAT FORMS THE BAY WINDOW BECAUSE THE REMAINDER OF THE WALL IS AT LEAST 3 FT FROM THE PROPERTY LINE.

## ATTACHMENT D

### Conversation with Mike Willson, City of OKC Fire Protection Specialist

**From:** Willson, Michael R <mike.willson@okc.gov>  
**Sent:** Wednesday, October 19, 2022 2:44 PM  
**To:** Chris Pritchard <CPritchard@beckdesign.com>  
**Subject:** RE: Pritchard - Beck Design - PUD - IRC Fire Question

The Residential building code will require a 1 hour fire rating in both directions with no openings allowed for any construction less than 3 foot from a property line. The zoning regulations will have no affect on the building code requirements for this addition. Projections are only allowed if 2 foot back from the property line with a 1 hour rating on the underside. # these are OKC amendments to the adopted 2015 IRC code. R302.1(1).  
So essentially with 0 lot line homes no openings or overhangs from the roof are allowed.

**From:** Chris Pritchard <CPritchard@beckdesign.com>  
**Sent:** Wednesday, October 19, 2022 1:35 PM  
**To:** Willson, Michael R <mike.willson@okc.gov>  
**Subject:** Pritchard - Beck Design - PUD - IRC Fire Question

Mr. Willson,

Good afternoon. My name is Chris Pritchard and I am an Architect with Beck Design. I had a fire protection question come up on a personal matter and I wanted to share with you and your group to help decipher what is acceptable for a new Residential Housing Development that is up for PUD rezoning.




Essentially, a developer group wants to rezone a site area near 164<sup>th</sup> and MacArthur from AA to a PUD. The PUD states that the development will be based on R1-ZL (Zero Lot Line). They are calling to reduce the minimum lot size from 4,000 sf to 2,500 sf and reduce the front yard setback distance from 25' to 15'. The structure will sit on one property line and have a 10' setback on the other side. This arrangement ends up leaving a buildable area of 15'x75' (1,125 sf) in the worst lot condition (25' x 100'). Extremely tight lots. The development lacks any provisions for fire suppression as well.

My question is with the structure sitting along the property line, does the 2015(2018) IRC R302.1(1) require for the wall to be 1hr rated for both interior and exterior (since it is within 3' of the property line)?  
Additionally, by the same measure, wouldn't all projections need to be rated at the soffit as well?  
And any openings along this wall would be prohibited, correct?

If you could help shed some light on this, I would greatly appreciate it.

Thank you,



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o: 405.232.7007  
New York | Oklahoma City | Tulsa  
collaboration driving innovation  
  

## ATTACHMENT D, cont.

### Conversation with Mike Willson, City of OKC Fire Protection Specialist

#### Oklahoma City Supplemental Residential Code Resolution

<https://www.okc.gov/home/showpublisheddocument/21968/637511420835930000>

**Table R302.1(1) EXTERIOR WALLS** has been modified to change most of the requirements in the column entitled "Minimum Fire Separation Distance" and to delete certain sub-rows under the column "Exterior Wall Element". The table description with modifications, is listed below:

There are three columns in the table entitled "Exterior Wall Element," "Minimum Fire-Resistance Rating," and "Minimum Fire Separation Distance."

Under the column entitled "Exterior Wall Element" the first row, entitled "Walls – Fire-resistance rated," has been modified to change the requirement in the column "Minimum Fire Separation Distance" from "less than 5 feet" to "less than 3 feet."

Under the column entitled "Exterior Wall Element" the second row, entitled "Walls – Not fire-resistance rated," has been modified to change the requirement in the column "Minimum Fire Separation Distance" from "greater than or equal to 5 feet" to "greater than or equal to 3 feet."

Under the column entitled "Exterior Wall Element" the third row, entitled "Projections – Not allowed," has been stricken from the table.

Under the column entitled "Exterior Wall Element" the fourth row, entitled "Projections – Fire-resistance rated," has been modified to change the requirement in the column "Minimum Fire Separation Distance" from "greater than or equal to 2 feet to less than 5 feet" to "less than 3 feet."

Under the column entitled "Exterior Wall Element" the fifth row, entitled "Projections – Not fire-resistance rated," has been modified to change the requirement in the column "Minimum Fire Separation Distance" from "greater than or equal to 5 feet" to "greater than or equal to 3 feet."

Under the column entitled "Exterior Wall Element" the sixth row, entitled "Openings in walls – Not allowed," has not been modified from the requirements in the existing table.

Under the column entitled "Exterior Wall Element" the seventh row, entitled "Openings in walls – 25 percent maximum of wall area," has been stricken from the code.

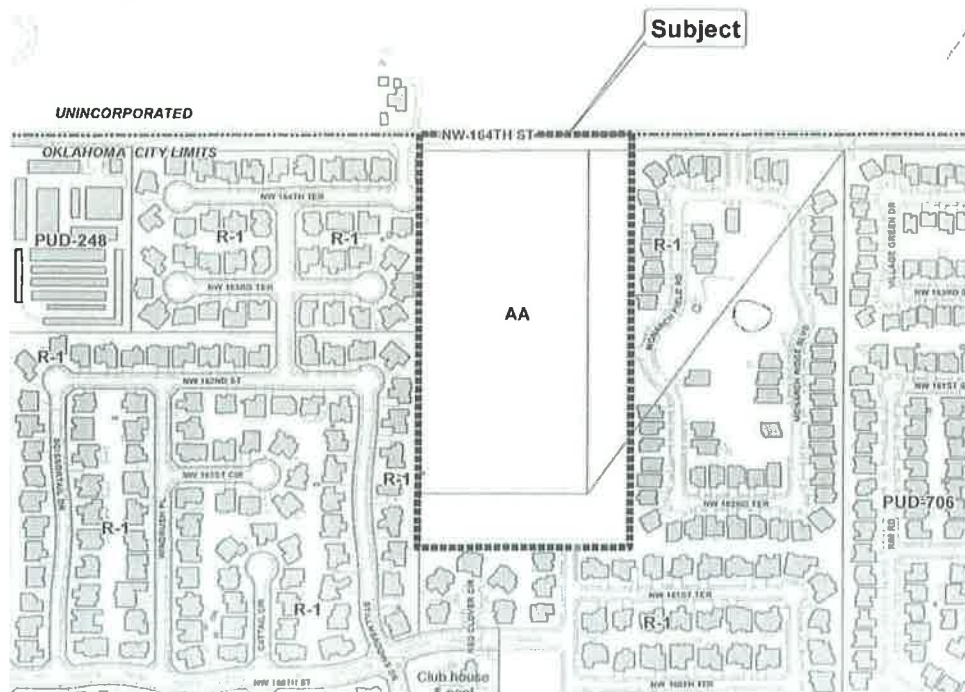
Under the column entitled "Exterior Wall Element" the eighth row, entitled "Openings in walls – Unlimited," has been modified to change the requirement in the column "Minimum Fire Separation Distance" from "5 feet" to "greater than or equal to 3 feet."

Under the column entitled "Exterior Wall Element" the ninth row, entitled "Penetrations – All," has been modified to change the requirement for the second sub-row in the column entitled "Minimum Fire Separation Distance" from "3 feet" to "greater than or equal to 3 feet."



## ATTACHMENT E Zoning Classification

### PUD Site

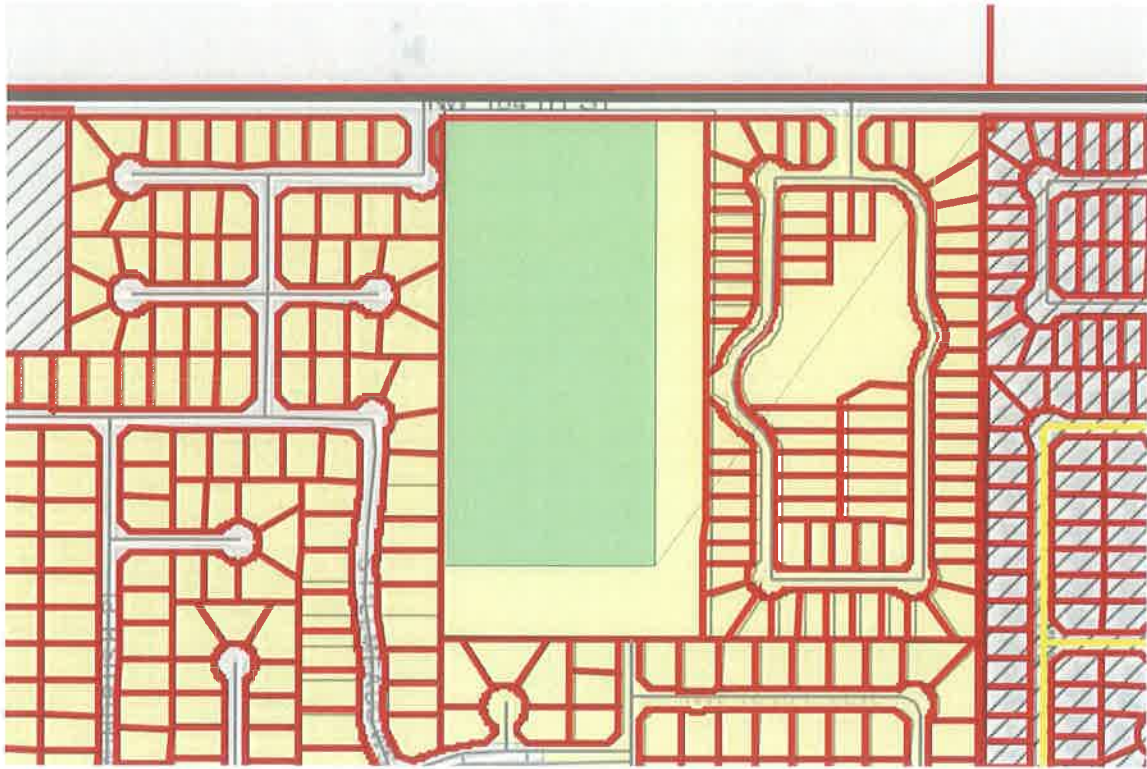


### Zoning Map





Zoning Overlay



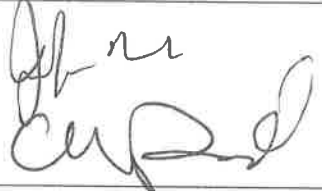

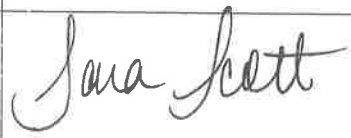


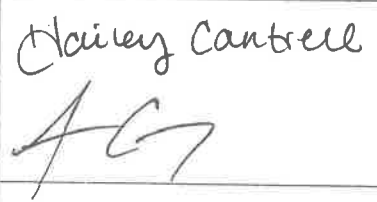

**ATTACHMENT F**  
**Monarch Ridge Protest Petition Signatures**

See attached

# MONARCH RIDGE HOMEOWNERS

Name	Address	Signature
Kyle McCloud Kevin Evans	16304 Monarch Ridge Blvd 73013	Kyle Kevin
Ryne Hoef	5318 NW 164th Ave Edmond, OK 73013	RH
Vickie Huxon	16321 Monarch Ridge Boulevard 73013	Vickie Huxon
Zach & Gina Runnels	16301 Monarch Ridge Blvd 73013	Zach
Jim & Beth Edwards	5301 Newlath Terr. 73013	Beth Edwards
Heather Lacy	16413 Monarch Ridge Blvd. 73013	Heather Lacy
PYAN AND JULIE HARRIS	16200 Monarch Ridge Blvd	Pyan

# MONARCH RIDGE HOMEOWNERS

Name	Address	Signature
Jennifer + Chris Pritchard	5200 NW 162 <sup>nd</sup> Ter Edmond OK 73013	
GARY GARLAND	16208 Monarch Ridge Blvd EDMOND, OK 73013	
Sara Scott	16416 Monarch Field Rd. 73013	
Dennis Downs	16409 Monarch Field Rd, Edmond, OK 73013	
Joshua & Paulina Chang	16360 Monarch Ridge Blvd Edmond, OK 73013	
Hailey & Austin Cantrell	5209 NW 162 <sup>nd</sup> Terr Edmond, OK 73013	
JOEL UBER	5304 NW 162 <sup>nd</sup> Terr Edmond, OK 73013	

# MONARCH RIDGE HOMEOWNERS


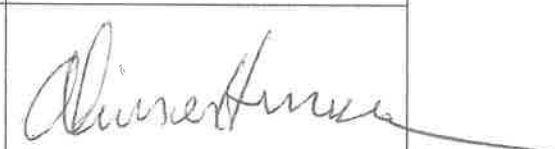



Name	Address	Signature
Joel + Julie Uber	5304 NW 162nd terrace	Julie Uber
Natalie Cox-Eckman & Kyle Eckman	16305 Monarch Field Road Edmond, OK 73013	N. Cox-Eckman Kyle Eckman
Mohamed + Nicole Daadawi	16209 Monarch Field Edmond, OK 73013	<del>DAADAWI</del>
Nicholas + Megan Hutton	16313 Monarch Field Rd Edmond, OK 73013	Megan Hutton
Cory + Jessica Jenkins	5301 NW 162nd	
Jim + Donna O'Hern	16309 - Monarch Ridge Field Rd.	Donna O'Hern
KENNETH & SHANNA FOSTER	16320 Monarch Field Rd Edmond, 73013	Shanna Foster



# MONARCH RIDGE HOMEOWNERS

Name	Address	Signature
ROBERT CHIN	16316 Monarch Ridge Blvd	RChin
Ryan & Sara Scott	16416 Monarch Field Rd.	RS
Richard & Nancy Wasson	16308 Monarch Ridge Blvd	Jwasson
Dan & Keri Daniels	16305 Monarch Ridge Blvd	Daniels
Franklin & Hannah Van Beckum	16309 Monarch Ridge Blvd	FV
Russell Swillis	16416 monarch. ridge	Russell Swillis
Monica Jenkins Chris Tagua	16420 Monarch Ridge Blvd	CT

# MONARCH RIDGE HOMEOWNERS

Name	Address	Signature
Kevin Hermansen	5213 NW 164th Terrace Edmond, OK 73013	
Alina Hermansen	5213 NW 164th Terrace Edmond, OK	
Kelly Graham	16304 Monarch Field Rd Edmond OK 73013	
Brenda Larson	16313 Monarch Ridge Blvd Edmond, OK 73013	
Michele Diesselhorst-Reese	16212 Monarch Ridge Blvd Edmond, OK 73013	
Kayla & Hyelee Kuri	16204 Monarch Ridge Blvd Edmond, OK 73013	