

Vision Statement

- P. 45 – 3rd Paragraph; 2nd & 3rd sentences should be deleted.
 - We do not believe that bringing the planning commission “in house” in the City of Tulsa is wise.
 - Currently, the City pays 41% of the TMAPC budget; yet 92% of all land development cases are in the City of Tulsa. This would make it financially unwise to remove the TMAPC from INCOG.

Land Use Chapter

- We endorse the change suggested by Fregonese to p. 33 as shown on the Consolidated Log.
- P. 51 – Last sentence under the section “Population and Job Growth” should be deleted.
 - There seems to be heavy reliance on small area plans in this plan. We believe that small area plans can be an important tool when used judiciously. The use of small area plans for new development seems excessive.
 - The NAHB reviewed the Final Draft of this plan at our request, they stated the following about the Small Area Plans in the PlaniTulsa Final Draft:
 - *“One should be aware that small area plans, regardless of their specificity, can end up being used to delay or protest against development in a designated small area plan area rather than encourage it. In this respect, the small area plan almost always provides for an additional layer of uncertainty in the zoning approval process. This point should be made very clear to the City.”*
 - *“The language in this section reads: ‘The primary means of implementing the PLANiTulsa comprehensive plan should be through small area and neighborhood planning process. This process can apply to existing neighborhoods in need of revitalization, main streets or other corridors, and vacant areas where new communities are envisioned.’”*
 - *“What is so troubling about this language is the scope in which small area planning can take place within the city. Essentially, all development, redevelopment, greenfield development could be subject to a small area plan. This is not typical of how small area plans are conducted.”*
 - *“An example definition given to a small area plan by the American Planning Association is as follows: ‘A plan.... That covers specific*

subareas of a (jurisdiction). These plans provide basic information on the natural features, resources, and physical constraints that affect development of the planning area. They also specify detailed land-use designation used to review specific development proposals and to plan services and facilities...”

- *“Limits on regulatory powers should be placed on them and their geographical locations should be limited to specific areas identified by the community as having special needs and goals.”*
- *“Small Area Plans have a role in Tulsa’s overall planning process, but they should be limited to areas where redevelopment is most targeted. Also, Small Area Plans should encourage private investment and development, not established to give neighbors unreasonable control over the development review process.”*
- We endorse the change suggested by Fregonese to p. 52 as shown on the Consolidated Log.
- P. 53 – Last sentence of 1st paragraph should be deleted.
 - We recommend that small area planning be limited to Areas of Change. Such a revision would make this final sentence irrelevant. Since revitalization in Areas of Stability is not anticipated by the plan, Small Area Plans, which by definition are designed to facilitate revitalization would have no place in such areas.
- P. 53 – The final sentence of the page should be replaced with: “The ideal for the Areas of Stability is to identify and maintain the valued character of an area while accommodating redevelopment, rebuilding and reinvestment as permitted through setback, height, and other objective development standards of the zoning code. While new and development will be encouraged and promoted in Areas of Change, it is not the intention of the Comprehensive Plan to prohibit redevelopment, rebuilding and reinvestment in Areas of Stability.”
- P. 53 – The map should be updated to show the two distinct categories of Areas of Stability (Established Areas vs. Reinvestment Areas) discussed on Page 54.
- P. 54 – First paragraph should be deleted.
 - This paragraph intimates that Areas of Stability are “watered down” versions of the protections which historic preservation district offer. This is not true and is a misleading implication.
- P. 54 – 2nd Column, 2nd paragraph, final sentence should be replaced with: “The challenge in these places is to preserve character without preventing property owners from reinvesting in, rehabilitating or rebuilding their homes.”
- P. 55 – Delete first paragraph on the page. (“This plan does not identify which areas are Established and which are Reinvestment Areas. . .”)
 - Since we are suggesting that the map DOES highlight the differences in these areas, this sentence would no longer make sense.

- We endorse the change suggested by Fregonese to p. 56 as shown on the Consolidated Log.
- P. 57 – Final paragraph, second sentence (“When possible, rezoning should be conducted under the auspices of a small area or neighborhood planning process.”) should be deleted.
 - As noted above, small area plans are over-used in this proposed plan.
- P. 57 – Final sentence under Parking Management Districts (“It is most likely that parking management and mixed-used zoning districts should be applied concurrently under the guidance of a small area or neighborhood planning process.”)
 - See comments above on the overusage of small area plans.
- P. 62 – First paragraph should be revised as follows: “One of the means of implementing the PLANiTULSA comprehensive plan should be through the small area and neighborhood planning process. This process can apply to existing neighborhoods in need of revitalization, main streets or other corridors, and vacant areas where new communities are envisioned.”

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- We endorse the change suggested by Fregonese to p. 74 as shown on the Consolidated Log.
- We endorse the change suggested by Fregonese to p. 75 as shown on the Consolidated Log.
- P. 76 – Delete Goal 3.8.
 - See comments above on overusage of small area plans.
- P. 77 – Goal 4.3 should be amended to read: “Ensure that adequate land to accommodate desired development is zoned and ready for development through implementation of city initiated zoning cases.”
 - Removing references to small area plans.
- We endorse the change suggested by Fregonese to p. 77 as shown on the Consolidated Log.
- P. 78 – Goal 5.3 – Does this mean that all new subdivisions in Tulsa must be done under a small area plan with “robust” involvement by the public? If so, developers will reject this and the suburbs will thrive. If our reading of this is accurate, this goal should be deleted.
- We endorse the change suggested by Fregonese to p. 81 as shown on the Consolidated Log.

Housing Chapter

- We endorse the change suggested by Fregonese to p. 11 as shown on the Consolidated Log.
- We endorse the change suggested by Fregonese to p. 13 as shown on the Consolidated Log.