

TULSA PRO HOUSING INITIATIVE

FY24 Pathways to Removing Obstacles to Housing (PRO Housing) <u>DRAFT</u>

Presented to the U.S. Department of Housing and Urban Development Oklahoma City Field Office September 2024

<u>Public Comment Period:</u> The draft application is available for public comment through Sunday, October 6, 2024. You can provide feedback by emailing **grantsadmin@cityoftulsa.org**, or during the public meeting on September 25, 2024.

Public Hearing: A public hearing will be held on **Wednesday, September 25, 2024, at 5 p.m.,** Council Chambers, 2nd Floor – 175 E. 2nd St., Tulsa, OK 74103 to gather feedback on the City's proposed application. This hearing is an opportunity for community members to share their thoughts on the application, which will help shape the final version submitted to HUD.

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Executive Summary for the Tulsa PRO Housing Initiative Proposal

The City of Tulsa's PRO Housing Initiative represents a pivotal step in addressing Tulsa's acute affordable housing crisis by integrating comprehensive stakeholder collaboration, strategic resource coordination, and policy reform. Building on the existing **Path to Home** strategy and guided by **Mayor G.T. Bynum's 3H Task Force**, this initiative seeks to unite stakeholders—including residents, business leaders, and advocates—under a shared vision of equitable housing development. It not only accelerates affordable housing production and preservation but also lays the groundwork for permanent removal of systemic barriers that have hindered progress.

Tulsa's housing shortage, as reported in the 2023 Tulsa Citywide Housing Assessment, requires the city to increase its annual housing production by 55% to meet the demand for 12,900 new units over the next decade. The PRO Housing Initiative will ensure that at least 51% of all newly produced or preserved units directly benefit low- and moderate-income (LMI) individuals, aligning with HUD's national objectives to increase affordable housing and reduce displacement.

Key Barriers and Solutions: This initiative is a critical piece of the broader Tulsa Housing Strategy, tackling major **barriers** to housing production through targeted components, including:

- 1. Housing Strategy and Project Coordinators: These key roles will align housing initiatives across city departments and stakeholders, ensuring efficient coordination and oversight to streamline housing development.
- 2. **Voluntary Vacant Property Acquisition Program**: By acquiring and preparing vacant lots in high-opportunity areas, this program reduces land acquisition costs for developers and paves the way for the creation of 40 new affordable units (20 rehab, 20 new construction).
- 3. **Affordable Housing Priority Program**: This program fast-tracks approvals for affordable housing developments and provides developers with technical and financial support.

This proposal will directly address three key barriers: limited developer capacity, outdated zoning and land use policies, and financial gaps that make affordable housing projects economically infeasible.

Creating Mechanisms for Long-Term Change: While immediate housing production and preservation are central to this proposal, it also solidifies long-term mechanisms that will permanently eliminate barriers to affordable housing development. Policy reform activities within the proposal will update zoning code regulations to unlock housing density and innovative housing types, such as ADUs and missing middle housing. These systemic improvements will ensure that Tulsa's housing ecosystem remains flexible, resilient, and accessible to LMI populations, even beyond the grant period.

Aligning with Local and National Objectives: The Tulsa PRO Housing Initiative complements existing local plans, such as the 2020-2024 Consolidated Plan and the Tulsa Housing Strategy, by expanding affordable housing opportunities in well-resourced areas. Additionally, it aligns with HUD's strategic goals, including:

- **Goal 1A: Advancing Housing Justice** by promoting equitable development and addressing longstanding housing inequities.
- Goal 2A: Increasing the Supply of Housing by addressing regulatory and financial barriers to housing production.
- **Goal 3A: Promoting Homeownership** through initiatives that help LMI families access homeownership opportunities.

Conclusion: By leveraging the leadership and coordination of Mayor Bynum's **3H Task Force** and the **Path to Home** strategy, the Tulsa PRO Housing Initiative unlocks the potential for both immediate and sustained affordable housing production. Through strategic investment in zoning reform, developer capacity-building, and vacant property redevelopment, this proposal positions Tulsa to meet its housing needs, while fostering long-term, equitable growth. The initiative provides the structure necessary to ensure permanent solutions, uniting key stakeholders under a shared vision and creating pathways to inclusive, sustainable, and affordable housing development.

Exhibit B. Threshold Requirements and Other Submission Requirements.

The City of Tulsa (applicant) has reviewed the threshold eligibility requirements and confirm that our application meets all necessary criteria. There are no outstanding civil rights matters, and we are in compliance with all applicable fair housing, civil rights, and non-discrimination laws. Our organization has no unresolved charges, lawsuits, or findings related to systemic violations, as specified in the NOFO. Additionally, this application has been submitted on time and in accordance with all deadlines and submission guidelines. As an eligible applicant, we are submitting only one complete application in line with the NOFO requirements.

Exhibit C. Need

Need: i.a.) Improved laws, regulations, or land use policies (10 points)

The City of Tulsa has made significant strides in addressing systemic barriers to affordable housing through regulatory reforms. These reforms focus on modernizing zoning regulations, simplifying land use policies, and facilitating increased density and housing diversity. This approach aligns with HUD's Pathways to Removing Obstacles to Housing (PRO Housing) initiative and ensures that housing production can meet the city's growing demand for affordable units.

Zoning Code Amendments for Housing Feasibility

In 2023, Tulsa Panning Office drafted a series of targeted zoning reforms that facilitate affordable housing. These **Housing Feasibility Amendments** would:

- Allow Duplexes, Multi-Unit Houses, Apartments, and Cottage House Developments by right in more Office and Commercial Districts
- Accommodate the conversion of vacant commercial buildings and hotels to housing, and facilitate cottage house development on smaller lots
- Allow manufactured housing approved by special exception to remain on a lot for more than one year, to which they are currently limited
- Reduce regulatory barriers to the construction of ADUs, providing affordable rental opportunities within established neighborhoods
- Reduce and simplify mandatory parking requirements for all uses citywide by approximately 23%, and for housing by up to 50%

An AARP audit of the Tulsa Zoning Code conducted alongside the Housing Feasibility Amendments identified key barriers that limited the development of affordable housing. These barriers were largely due to outdated zoning laws, including excessive reliance on single-family zoning and restrictions on multi-unit housing types. The findings highlighted that such regulations impeded the development of affordable housing types such as duplexes, triplexes, and accessory dwelling units (ADUs). To address these issues, the following amendments were proposed:

- Allowing increased density in Office and Commercial Districts, making it easier to build housing in areas with employment opportunities.
- Simplifying the development process for duplexes, multi-unit houses, and cottage housing, reducing regulatory hurdles and costs for affordable housing developers.
- Reducing parking requirements near public transit hubs, which lowers development costs and encourages transit-accessible housing options.
- Expanding the legal permissibility of ADUs without requiring variances, creating more affordable rental opportunities within established neighborhoods.

These amendments are projected to create new affordable housing units over the next five years, particularly focusing on workforce housing and providing options for low- to moderate-income families.

Neighborhood Infill Overlay (NIO)

In 2021, the **Neighborhood Infill Overlay (NIO)** was introduced to promote higher-density housing in areas previously restricted to single-family homes. The NIO permits the construction of duplexes, triplexes, quadplexes, apartments, cottage homes, townhouses and ADUs, addressing both density and Naturally Occurring Affordable Housing (NOAH). Initially applied to neighborhoods around downtown Tulsa, the overlay was expanded to the **Dawson neighborhood** in 2023, further increasing housing options.

The NIO promotes affordable housing production through reduced regulatory restrictions, contributing directly to Tulsa's goal of fostering diverse housing choice in high-opportunity areas.

Streamlining Permitting Processes

In 2023, Tulsa enacted permitting reforms specifically for affordable housing developments. These reforms included:

- Revised permitting guidelines aimed at reducing approval times
- Simplified application requirements, particularly for small-scale and nonprofit developers

Since these reforms were implemented, permitting times have decreased by 15%, allowing developers to move more quickly from planning to construction.

Small Area Plans (SAPs)

Tulsa has also adopted **Small Area Plans (SAPs)** to establish policy support for housing production barriers on a neighborhood-specific level. These plans integrate zoning, infrastructure, and land use policies with the unique needs of each area, such as the **Kendall-Whittier Small Area Plan**, **36**th **Street North Small Area Plan**, **Crutchfield Small Area Plan**, **Unity Heritage Neighborhoods Plan**, **and others**. The SAPs encourage the development of diverse housing types like townhomes, duplexes, and multi-family units.

Ongoing and Future Impact

The comprehensive zoning and permitting reforms adopted by the City of Tulsa—such as the Housing Feasibility Amendments, Neighborhood Infill Overlay, and Small Area Plans—have laid a strong foundation for expanding affordable housing production. These efforts align with HUD's goals of increasing housing access, promoting racial equity, and advancing sustainable community development. However, further scaling these initiatives will be essential for Tulsa to fully meet its housing needs.

The PRO Housing proposal seeks to build on these successes, providing the necessary infrastructure and funding to ensure that the city can continue to remove barriers and facilitate affordable housing production well into the future.

Need: i.b.) Other Recent Policy Changes, Housing Strategies, and New Initiatives to Increase Housing Supply or Lower Costs (5 points)

The City of Tulsa has developed a multifaceted approach to address its critical housing shortages and rising housing costs. Grounded in the findings of the 2023 Tulsa Citywide Housing Assessment, Tulsa's strategy leverages a combination of innovative housing policies, funding mechanisms, and public-private partnerships. These efforts aim to overcome barriers to housing production and preservation, increase affordability, and provide housing options that meet the city's diverse needs.

Affordable Housing Trust Fund (AHTF)

Since its creation in 2021, the Affordable Housing Trust Fund (AHTF) has been central to Tulsa's affordable housing strategy. Seeded with \$4 million in city funds and \$7.5 million in private contributions, the AHTF provides no-interest and forgivable loans for housing development. Additionally, it offers grants for rental assistance, landlord incentives, down payment assistance, and homeownership training. The AHTF has been instrumental in supporting the development of 80 affordable housing units and providing rental assistance for 240 tenants. A recent Request for Proposals (RFP) yielded 16 proposals, with a potential output of nearly 1,600 units.

Public-Private Partnerships and Capacity Building

Tulsa's approach includes strategic partnerships with nonprofit developers and financial institutions. Green Country Habitat for Humanity and its affiliate, Boomtown Development Company, are key examples. These organizations have increased their production capacity from 20 homes annually to over 85 homes per year, focusing on workforce housing and attainable rental properties. The city has also seen substantial investment in downtown housing through partnerships funded by the Downtown Development and Redevelopment Fund (DDRF) and Tax Increment Financing (TIF) districts. Since 2020, over 600 new units have been added, with an additional 1,000 units under construction or planned.

Preservation and Mixed-Income Development

Preservation of affordable housing is another priority for Tulsa. The city's **Choice**Neighborhoods Initiative (CNI) grant has helped facilitate mixed-income developments, such as the \$200 million 36N community, which will include 545 rental units. The **River West** development—Tulsa's first intentional mixed-income community—leveraged \$35 million in HUD CNI funds, alongside local and philanthropic contributions, to replace a distressed public housing property with 435 rental units. These developments are part of the city's larger efforts to integrate subsidized, workforce, and market-rate housing to reduce concentrated poverty and promote long-term housing affordability.

Targeted Investments in Underserved Communities

Recent initiatives have focused on preserving affordability and improving housing quality in underserved areas. For example, the Peoria-Mohawk TIF, established in North Tulsa, allocates \$35 million to support neighborhood rehabilitation and homeownership. Additionally, PartnerTulsa, in collaboration with the Tulsa Development Authority, has sold 23 parcels for the development of 167 new housing units, with seven more parcels in the process of being sold to further boost production. Tulsa's **Neighborhood Investment Trust**, implemented by Growing Together in the Kendall-Whittier neighborhood, is another innovative model that utilizes shared equity to preserve affordable housing and ensure long-term affordability in high-opportunity areas.

Capacity Building and Financing Mechanisms

Tulsa has worked to expand the capacity of its housing development ecosystem through initiatives such as **CDFI Friendly Tulsa**, which increases access to fair and patient lending for affordable homeownership and rental housing. This initiative targets historically underserved communities, providing awareness and connections between developers and regional and national CDFIs, who provide access to critical financial support on projects that serve low- and moderate-income families. Additionally, the city's focus on financing mechanisms includes programs that provide gap funding for developments, such as the \$42.6 million TIF passed near the Peoria-Mohawk Business Park. Of this, \$35 million is dedicated to supporting neighborhood rehabilitation and homeownership over the next 25 years.

Addressing Structural Challenges and Infrastructure Barriers

Recognizing that outdated infrastructure often hampers new development, Tulsa has taken steps to overcome these barriers. The **Downtown Office Conversion Study**, for example, identifies vacant office buildings suitable for conversion into housing, with a focus on affordability and workforce units. These efforts are aligned with the city's broader goal of increasing housing supply while addressing the specific needs of underserved populations.

Anti-Displacement Initiatives and Community Resilience

Tulsa's efforts also include a range of anti-displacement strategies aimed at preserving affordable housing and maintaining community stability in gentrifying areas. Programs like the AHTF's rental assistance and landlord incentives help mitigate the impact of rising housing costs. Additionally, the city is actively working to strengthen eviction prevention programs and financial empowerment initiatives, which offer foreclosure prevention services and down payment assistance to low- and moderate-income families. These programs are crucial for keeping vulnerable households in their homes and stabilizing neighborhoods.

Need: ii.) Acute Need for Housing in Tulsa and Remaining Affordable Housing Needs (10 points)

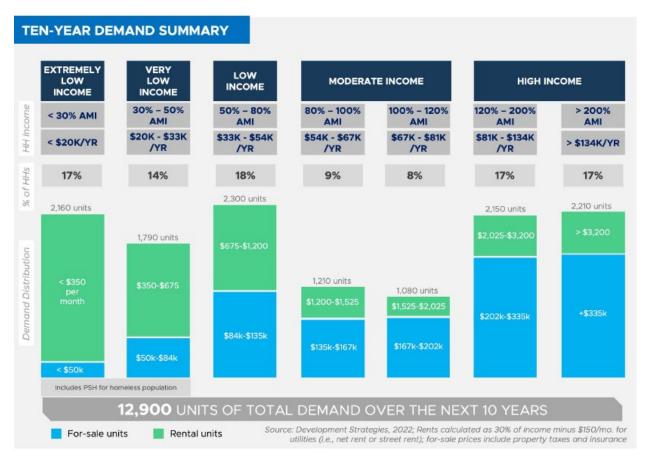
Tulsa's housing crisis has reached critical levels, with substantial gaps in the availability of affordable, accessible housing, particularly for low- and moderate-income families. Based on the **Tulsa Citywide Housing Assessment** (March 2023), the city faces an immediate and urgent need for housing production and preservation across the entire affordability spectrum, but especially for families earning less than 80% of AMI.

Housing Supply Deficit and Cost Burden The assessment reveals that Tulsa is projected to need 12,900 new housing units over the next 10 years to meet current and future demand. Of these, 6,100 units are required for rental housing, with demand most acute in the 0-50% AMI range, which represents the city's most vulnerable populations. In 2022 alone, 46% of renters in Tulsa were cost-burdened, paying more than 30% of their income on housing, while 45% of the housing stock is over 50 years old, exacerbating safety and affordability issues.

Tulsa's rental vacancy rate hit a **20-year low of 6.6%** in 2022, which has driven rents upward at a pace that outstrips both wage growth and inflation. The average rent in Tulsa increased by **22% between 2018 and 2022**, further burdening renters. While citywide rents averaged **\$840 per month**, fair market rent for a two-bedroom apartment was **\$987**, requiring a housing wage of nearly \$19 per hour—well above the income of many Tulsa residents.

Shortage of Affordable Units There are approximately 63,600 households earning at or below 60% of AMI, but only 14,600 dedicated affordable housing units exist in the city. This leaves 49,000 households reliant on market-rate housing, which, in many cases, is unaffordable or inadequate. Additionally, 16,200 of these households face acute risks such as living in substandard housing or being at risk of eviction or displacement. The significant pressure on the rental market, paired with aging housing stock and rising costs, contributed to the more than 1,300 individuals experiencing homelessness in the 2024 Point In Time (PIT) count.

The city's urgent need for affordable housing is reflected in the demand for 2,730 units to achieve functional zero homelessness, primarily concentrated in the <30% AMI and 30-50% AMI income ranges. This need includes 1,400 units of Rapid Rehousing, 1,200 units of Permanent Supportive Housing, and 130 units of Transitional Housing. The shortage of affordable housing has also directly contributed to a homelessness system that continues to strain under unmet needs.



Displacement Risks and Inequities The housing crisis is particularly severe in Tulsa's most underserved neighborhoods, such as **North Tulsa**, where median household incomes are **less** than half of the city average and home values lag far behind. The **North Tulsa subarea** saw median home prices of just \$110,000, compared to \$260,000 in southern parts of the city, highlighting the significant geographic disparities in housing availability and affordability.

The city's revitalization efforts, such as the **Choice Neighborhood Initiative**, have begun to address these inequities by targeting housing redevelopment in historically underserved areas. However, rising home prices citywide, driven in part by **Tulsa Remote** (a program that offers stipends to encourage remote workers to move to Tulsa) and **increased migration**, have put further pressure on low-income residents and risk displacing vulnerable communities. Tulsa welcomed over **850 Afghan refugees** and 1,700 remote workers in recent years, further increasing the demand for affordable housing in an already tight market.

Aging Housing Stock and Inadequate Housing Conditions The aging housing stock in Tulsa presents a significant challenge. Nearly half of Tulsa's housing units were built before 1970, and many are in disrepair. Long-term homeowners on fixed incomes, particularly in low-income areas, face the financial burden of maintaining these aging properties. Additionally, the housing stock in North Tulsa includes many Class C rental properties, which are older and more likely to have deferred maintenance issues, further compounding the affordable housing crisis.

The acute need for preservation and rehabilitation of the existing housing stock is essential, as these units represent a critical portion of naturally occurring affordable housing. Without intervention, these homes will continue to deteriorate, resulting in further displacement of low-income families.

Immediate Action Required To address these acute needs, Tulsa must increase its housing production by 56% over historical levels, requiring an aggressive strategy to overcome entrenched barriers in the housing market. The City of Tulsa has already begun implementing key zoning reforms and streamlining processes to accelerate housing development. However, additional funding and resources are urgently needed to scale these efforts, preserve existing affordable housing, and prevent further displacement in at-risk communities.

By focusing on increasing housing access, preserving existing affordable units, and addressing the deep inequities within the housing market, Tulsa can begin to tackle the acute housing needs facing its most vulnerable residents.

Need: iii.) What Key Barriers Still Exist and Need to Be Addressed to Produce and Preserve More Affordable Housing? (10 points)

Despite Tulsa's progress in regulatory and land use reforms and capacity building, several critical barriers continue to impede the production and preservation of affordable housing. These barriers directly affect the City's ability to meet the acute need for affordable housing across income levels, particularly for low- and moderate-income households. Each barrier identified below is

supported by findings from the 2023 Tulsa Citywide Housing Assessment and the 2024 Tulsa Housing Strategy.

Barrier 1: Developer Capacity Limitations

Tulsa's affordable housing ecosystem remains constrained by the limited capacity of local nonprofit and national developers, compounded by the underrepresentation of minority- and women-owned developers. This significantly hinders the city's ability to meet affordable housing needs. Some key nonprofit developers have increased their production capacity, such as Green ountry Habitat for Humanity scaling from 20 homes annually to over 85 homes per year, and Tulsa Housing Authority which is the state's most active LIHTC developer having preserved over 1700 units and built over 500 units since 2020. Still, there is a notable gap in the development pipeline necessary to meet the projected demand for 12,900 new housing units over the next 10 years. Minority and women-owned developers face additional financial and operational challenges, limiting their participation in housing projects. Tulsa's Housing Strategy highlights the importance of expanding capacity, especially among nonprofit and underrepresented developers, to scale up equitable, community-informed housing production across income levels.

The proposed **Tulsa PRO Housing Initiative** addresses these capacity issues by bringing in national expertise and providing technical assistance to both minority developers and local nonprofit organizations. This approach will also prioritize capacity building through key stakeholder groups like **TEDC and PartnerTulsa**, empowering these groups to overcome financial barriers and operational challenges. This directly supports HUD's goal of increasing the supply of affordable housing while advancing racial equity and economic inclusion.

- Limited Capacity of Local Nonprofit Developers: Tulsa's affordable housing ecosystem is limited by the small number of nonprofit developers with the experience and capacity to scale housing production.
- *Underrepresentation of Minority Developers*: Minority- and women-owned developers face significant financial and operational challenges limiting their ability to participate in housing development projects.
- Challenges in Attracting National Developers: Decades of challenges in attracting national developers to Tulsa's affordable housing market have exacerbated production limitations. This is primarily due to financial barriers and limited incentives for developers to enter the local market.

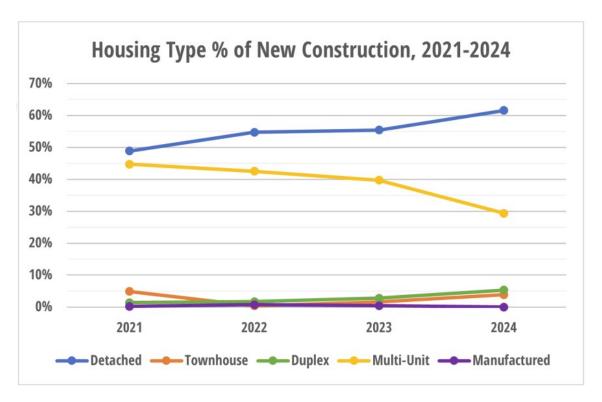
Barrier 2: Outdated Zoning and Land Use Policies and Development Procedures

Despite recent reforms, Tulsa's outdated zoning laws continue to restrict the development of multi-unit housing and missing middle housing types such as ADUs and duplexes citywide. High-opportunity areas remain constrained by low-density zoning, limiting the development of necessary housing options. While the introduction of the Housing Feasibility Amendments and the Neighborhood Infill Overlay has begun to address these issues, regulatory requirements and

the permitting and approval process remain a barrier, causing delays and raising development costs. Stakeholders report that multiple review cycles and inconsistent requirements across City departments increase complexity and deter developers from engaging in certain projects.

Missing Middle housing options, neighborhood-scale buildings that include duplexes, triplexes, quadplexes, courtyard apartments, cottage courts, townhouses, and small apartment buildings, are few and far between in Tulsa and are illegal to build in 84% of the city's land despite resident preferences. In **two citywide housing preference surveys** from 2019 and 2020, 63% of respondents favored townhouses, 50% supported duplexes, triplexes, or quadplexes, and 52% preferred apartments with 10 or more units. While 71% preferred detached houses, nearly 30% favored other housing types. In the second survey, 63% supported allowing more duplexes, 48% favored triplexes and quadplexes, 67% backed townhouses, 60% supported courtyard apartments, 49% wanted more walk-up or mixed-use apartments, and 68% supported ADUs or backyard cottages.

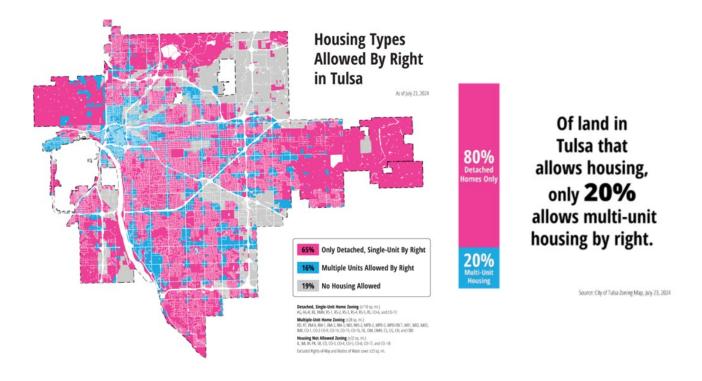
Duplexes, triplexes, and quadplexes comprise only 7% of our existing housing stock, and townhouses only 3%. In addition, new multi-unit housing units as a percentage of all housing construction in Tulsa has decreased in the past four years, as the share of detached homes has increased.



The **Housing Feasibility Amendments** (poised for final approval in Q4 2024) have begun addressing this issue, but further zoning reforms are necessary to increase density and flexibility for housing types built in traditional neighborhoods before 1945. Additionally, **lengthy permitting and approval processes** create delays that increase development costs and slow

down affordable housing production. Through the proposed **System Coordination and Policy Reform Activities**, Tulsa will streamline permitting procedures, implement zoning reforms, and introduce pre-approved plans for affordable housing, ensuring that the City's zoning and regulatory processes no longer serve as barriers to development.

- Restrictive Zoning Regulations: Outdated zoning laws continue to limit the development of multi-unit housing, especially in high-opportunity areas where density is needed most.
- Lengthy Permitting Processes: Lengthy approval times and complex permitting procedures raise costs and delay development, particularly for smaller and nonprofit developers.
- *Underutilized "Missing Middle Housing" Opportunities*: While reforms have started, there is still a significant need to unlock the development of missing middle housing types like ADUs, townhomes and duplexes, particularly in high-opportunity and transit-accessible neighborhoods.



Barrier 3: Infrastructure and Financial Gaps

Another significant barrier is the financial feasibility of affordable housing projects. Rising land acquisition costs and outdated infrastructure increase development expenses, while the availability of gap funding remains limited. According to the 2023 Tulsa Housing Assessment, there is an annual funding gap of \$37 million to fully meet the city's housing demand, especially for low- and moderate-income families. 50% of Tulsa's housing stock was built before 1970,

requiring costly updates that impede affordable housing preservation. Without addressing these financial gaps, affordable housing development will continue to lag behind demand.

The **Voluntary Vacant Property Acquisition Program** is a key solution to this barrier, as it will leverage city-owned vacant properties for redevelopment, particularly prioritizing minority developers. By providing financial support through gap funding mechanisms, this initiative will help address the economic feasibility challenges that have historically limited housing production.

- *High Development Costs and Infrastructure Barriers*: Rising costs associated with land acquisition, construction, and infrastructure improvements are significant obstacles for developers, particularly in distressed neighborhoods.
- Limited Gap Funding Availability: The lack of sufficient gap funding prevents developers from closing financial gaps, especially in projects aimed at affordable housing for lower-income families.
- Aging Infrastructure: Outdated infrastructure further complicates and increases the cost of developing affordable housing, particularly in older parts of the city where essential services (e.g., sewer, water) need upgrades.

System Coordination for Planning and Policy Activities:

- City Capacity Building: Hiring a *Housing Strategy Coordinator and Housing Project Coordinator* (PRO Housing Funded) will accomplish one of the 2024 Housing Strategy's core recommendations that will support planning and implementation for each activity proposed under the Tulsa PRO Housing Initiative. These two critical City staff additions will be led by the Housing Manager to implement policy improvements and initiate scalable city-wide strategies that will addresses the limited capacity of local developers and support HUD's goal to increase the supply of housing.
- **Promising Practices Technical Assistance**: Smart Growth America (SGA)'s Technical Assistance (Leveraged Funds) to develop and implement evidence-based promising practices in a multitude of areas will result in permanent mechanisms for stakeholder coordination, impact measurement, regulatory and policy improvements, and more. PRO Housing-funded staff additions will coordinate with SGA to plan and implement the resulting recommendations and strategies.

Development Activities to Produce and Preserve Affordable Housing:

- Voluntary Vacant Property Acquisition Program: The acquisition and redevelopment of vacant properties will increase affordable housing production in high-opportunity areas (PRO Housing Funded). This targets both infrastructure barriers and financial gaps by leveraging city-owned vacant land to lower development costs, resulting in at least 40 affordable housing units during the grant period (20 rehabilitation, 20 new construction) to be sold to targeted underserved community members with incomes below 100% AMI.
- Affordable Housing Priority Program and Pre-Approved Plans: Providing technical assistance to affordable or nonprofit developers through pre-approved plans will

accelerate the development process, addressing zoning and permitting barriers (Leverage Funded). PRO Housing-funded staff will coordinate development and implementation for these programs that will complement the Voluntary Vacant Property Acquisition program and will contribute to a significant increase in affordable housing production and preservation through streamlined processes, developer capacity building, and development cost reductions.

Exhibit D Soundness of Approach.i. Vision for PRO Housing Funds (15 points)

Vision for the Tulsa PRO Housing Initiative | The City of Tulsa's vision for the PRO Housing program is to create a comprehensive and sustainable housing ecosystem that increases the production and preservation of affordable housing while addressing key systemic barriers to housing development. Through targeted interventions—such as zoning reform, financial and technical assistance for developers, and property acquisition in high-opportunity areas—Tulsa aims to foster inclusive growth, reduce displacement, and promote long-term community resilience.

This proposal is driven by the city's commitment to providing equitable housing opportunities for low- and moderate-income households, particularly in areas that have historically been inaccessible due to high land costs and regulatory barriers. The initiative seeks to expand housing choices across diverse neighborhoods, promote racial equity in housing development, and ensure that underserved communities benefit from new economic opportunities.

Proposed Activities Aligned with Identified Needs | The proposed activities are directly aligned with the findings of the 2023 Tulsa Citywide Housing Assessment, which identified an immediate need for 4,000 additional housing units and a projected demand for 12,900 units over the next 10 years. By increasing annual housing production by 55%, Tulsa will address the significant shortfall in housing availability, with **at least 51% of the new or preserved units benefiting low- and moderate-income individuals.** Each of the proposed activities addresses one or more barriers to housing production, including outdated zoning, developer capacity limitations, and high land acquisition costs.

PRO Housing Program Activities

Tulsa faces several barriers that impede the production and preservation of affordable housing, which this proposal directly addresses through targeted program components:

1. Housing Strategy Coordinator (PRO Housing Funds)

This role ensures that housing initiatives align with broader city strategies and HUD's goals, providing **oversight and coordination** of policy reforms, zoning updates, and development plans. The Housing Strategy Coordinator will reduce barriers to affordable housing production by working across city departments, external partners, and developers to ensure efficient and

equitable development. This role addresses issues such as **outdated zoning code regulations** and land use policies that limit density and housing options, drives process improvements, and implements mechanisms for permanent systems change and stakeholder & resource coordination across Tulsa's housing ecosystem.

National Objectives: Benefiting Low- and Moderate-Income (LMI) persons **HUD Strategic Goals:** 1A: Advance Housing Justice (Promoting equitable access to affordable housing in underserved communities) 2A: Increase the Supply of Housing (By aligning zoning and planning updates to increase housing density and production)

2. Housing Project Coordinator (PRO Housing Funds)

The Housing Project Coordinator will serve as a **single point of contact** for developers, guiding them through newly reformed zoning, permitting, and regulatory processes. By streamlining communications between city departments and providing direct support, this position will **reduce delays**, ensure regulatory compliance, and **accelerate project timelines** from concept to completion. The role is critical in reducing the time and cost burdens that traditionally hinder affordable housing production. Will also lead PRO Housing core pilot programs including the Affordable Housing Priority and Voluntary Vacant Property Acquisition Programs.

National Objectives: Benefiting LMI persons

HUD Strategic Goals: 2A: Increase the Supply of Housing (By improving the efficiency of the development process to accelerate housing production) 1C: Invest in the Success of Communities (By supporting small developers in navigating complex city processes and providing better access to development opportunities)

3. System Coordination and Planning Activities (PRO Housing Staff & Leveraged T.A.)

The <u>System Coordination and Planning Activities</u> will ensure that Tulsa's housing ecosystem functions efficiently over the long term. With <u>Technical Assistance</u> from <u>Smart Growth America (SGA)</u>, the new PRO Housing staff (Housing Strategy Coordinator and Housing Project Coordinator) will identify and address gaps in zoning, permitting, and development processes. This will involve:

- Comprehensive zoning code assessments to promote higher density and innovative housing solutions.
- Housing suitability mapping to target high-opportunity areas for affordable housing.
- Coordinated systems for stakeholder engagement, ensuring inclusive planning.
- Economic impact analysis to measure the fiscal implications of the proposed strategies.

These activities will be monitored and driven by an advisory committee of key stakeholders, ensuring long-term coordination and efficiency across the housing ecosystem. Additionally, they align with **HUD's goal** of reducing regulatory barriers to housing production.

<u>Policy Reform</u> will focus on **updating zoning code regulations** to allow higher-density housing and the development of missing middle housing types, such as **ADUs**, **duplexes**, and

triplexes. By prioritizing **affordable housing production in well-resourced areas**, these reforms will unlock development potential in underutilized spaces, ensuring that new housing is built in transit-accessible, high-opportunity areas. **Streamlined permitting processes** will further reduce delays, accelerating housing production.

National Objectives: Benefiting LMI persons

HUD Strategic Goals: 2A: Increase the Supply of Housing (By reforming zoning codes and expanding high-density, affordable housing options) 1C: Invest in the Success of Communities (By supporting equitable planning and removing systemic barriers that limit housing development for underserved populations)

4. Pre-Approved Plans Program (Leverage Funds)

The **Pre-Approved Plans Program** will expedite the **design and approval process** for nonprofit developers and small-scale builders. By offering pre-approved architectural plans for various housing types, including ADUs, duplexes, and triplexes, the program will lower design costs and approval times, making it easier for developers to implement affordable housing projects in **high-opportunity neighborhoods**. This program draws on national models, such as those in **Kalamazoo**, **MI** and **South Bend**, **IN**, where similar programs significantly increased affordable housing production.

National Objectives: Benefiting LMI persons

HUD Strategic Goals: 2A: Increase the Supply of Housing (By reducing design costs and streamlining the approval process for affordable housing) 1C: Invest in the Success of Communities (By creating opportunities for small-scale developers to access affordable housing markets)

5. Voluntary Vacant Property Acquisition Program (PRO Housing Funds)

The Voluntary Vacant Property Acquisition Program will address high land acquisition costs and the legal complexities associated with vacant lots in well-resourced areas. By acquiring and preparing vacant properties in high-opportunity zones, this program removes entitlement risks and lowers land costs, making it more feasible for developers to build affordable housing. PRO Housing grant funds will be used to ensure that these homes are affordable at or below the 100% AMI level and that they are sold to LMI homebuyers from underserved communities. The program prioritizes properties near public transit and employment hubs, aligning with HUD's objectives of expanding affordable housing access in high-opportunity areas. In its pilot phase during the PRO Housing period of performance, this program will produce at least 40 units of affordable housing (20 rehab, 20 new construction). This core program component will utilize the majority of PRO Housing grant funds to subsidize acquisition and predevelopment costs to ensure developers are incentivized to take on these projects that otherwise would be cost prohibitive.

It is important to note that **no program income** will be generated from the transfer of properties under the Vacant Property Acquisition Program. The land will be donated or transferred at a

nominal value, without generating income for the City, in strict compliance with HUD's CDBG regulations. Additionally, **no subgrant program** will be created, as all grant-funded predevelopment costs—including acquisition, legal, demolition, and infrastructure expenses—will be directly managed by the City of Tulsa and the PartnerTulsa (i.e. Tulsa Development Authority (TDA)—see Capacity Section for more detail). This ensures full oversight and avoids the need to pass funds to developers, further preventing any unintended program income while maintaining compliance with HUD guidelines.

National Objectives: Benefiting LMI persons, Preventing/eliminating slums and blight HUD Strategic Goals: 2A: Increase the Supply of Housing (By converting vacant, underused lots into affordable housing) 3A: Advance Sustainable Homeownership (By providing affordable homeownership opportunities for LMI families in well-resourced neighborhoods) 1C: Invest in the Success of Communities (By prioritizing wealth-building opportunities for local, small-scale developers)

6. Affordable Housing Priority Program (Leverage Funds)

The Affordable Housing Priority Program will fast-track approvals for developments that address critical affordable housing needs. By offering technical assistance in affordable housing financing through Housing Forward and streamlining the permitting process, this program will reduce the administrative and financial burdens on developers. Resource-constrained projects will benefit from subsidies and coordinated project reviews, ensuring that affordable housing developments are delivered efficiently and in areas with high community need.

National Objectives: Benefiting LMI persons

HUD Strategic Goals: 2A: Increase the Supply of Housing (By reducing approval times and offering incentives for affordable housing projects in high-need areas) 1B: Reduce Homelessness (By ensuring that affordable housing is prioritized in areas where LMI families are at risk of homelessness or housing insecurity)

Addressing Key Barriers to Affordable Housing Production

Key Barrier: Developer Capacity Limitations

Tulsa's housing ecosystem is constrained by a lack of capacity among **local nonprofit developers** and the **underrepresentation of minority- and women-owned developers**. To overcome this, the following components have been integrated:

- Housing Forward Partnership: This partnership will provide expertise and resources to attract national developers to Tulsa while guiding local developers through complex projects. Housing Forward will also assist in navigating financing barriers, such as accessing Tax Credits and other affordable housing financing products.
- TEDC and PartnerTulsa Capacity Building Programs: These programs will offer technical assistance, training, and financial support to minority- and women-owned

- developers, empowering them to overcome operational challenges and scale their operations.
- Voluntary Vacant Property Acquisition Program: Minority developers will be prioritized in the redevelopment of vacant properties, ensuring underrepresented groups play a key role in transforming blighted areas into affordable housing.

Key Barrier: Outdated Zoning, Land Use Policies, and Inefficient Procedures

Tulsa's zoning regulations restrict housing density and slow down production. The proposal includes:

- Housing Strategy Coordinator and Housing Project Coordinator: These roles will lead efforts to update zoning code regulations, allowing higher density and more flexible land use policies. They will also streamline permitting processes to reduce approval times for affordable housing projects.
- **Policy Reform Activities**: The City will update its zoning code regulations to allow various housing types including **ADUs**, **duplexes**, **and triplexes**, making it easier to build missing middle housing in areas where housing is in high demand.
- **Pre-Approved Plans Program**: This program will simplify and expedite the design process, making it easier for small-scale developers to produce affordable housing.

Key Barrier: Economic Feasibility and Financial Gaps

Financial gaps, deteriorating infrastructure, and high land acquisition costs pose significant barriers. The proposal addresses these through:

- Voluntary Vacant Property Acquisition Program: This program lowers land costs and addresses legal barriers to development by acquiring and preparing vacant properties in well-resourced areas.
- Affordable Housing Priority Program: By fast-tracking approvals and offering financial incentives, this program will make affordable housing developments more financially feasible, especially in areas with high development costs.

Alignment with Local Initiatives

This proposal builds on existing local initiatives, such as the 2020-2024 Consolidated Plan, the 2023 Tulsa Housing Strategy, and the planitulsa Comprehensive Plan. It supports the goals outlined in these plans by:

- Expanding affordable housing in high-opportunity areas through zoning reform.
- **Supporting economic development** by creating housing near employment centers and public transit routes.
- Leveraging \$75 million in sales tax funding dedicated to housing, part of the \$104.2 million Tulsa Housing Initiative, ensuring that Tulsa's housing ecosystem is ready for an unprecedented infusion of resources. This unprecedented funding will become available

starting in 2026 to expand affordable housing production and preservation efforts made possible by the improvements made under the Tulsa PRO Housing Initiative.

Environmental and Community Resilience

The proposal integrates strategies to mitigate flood risks by **prioritizing properties outside flood-prone areas** and utilizing **stormwater management techniques**. These priorities were reflected in the RFP, released in August 2024 for the new Pre-Approved Plans program, which will launch in alignment with the proposed Tulsa PRO Housing initiative in early 2025. Although energy-efficient design features, such as solar-ready infrastructure and high-performance insulation, were encouraged, the focus remained on ensuring resilience and sustainability. These efforts align with Tulsa's Resilience Strategy, supported by the Mayor's Office of Resilience and Equity, and are informed by evidence-based strategies, including HUD's Community Resilience Toolkit, ensuring that affordable housing developments are sustainable and climate-resilient.

Conclusion

Tulsa's PRO Housing proposal integrates systemic policy reforms, capacity-building initiatives, and targeted development programs to increase the production and preservation of affordable housing. By addressing developer capacity limitations, outdated zoning, and financial gaps, this proposal directly aligns with HUD's national objectives. The Voluntary Vacant Property Acquisition Program, Affordable Housing Priority Program, and other components will ensure that Tulsa meets its current and future housing needs, expanding access to well-resourced areas, reducing displacement, and promoting racial and economic equity.

Soundness of Approach: ii.) What is your geographic scope? (5 points)

The City of Tulsa's PRO Housing proposal will have a citywide impact, addressing housing needs across diverse neighborhoods, from North Tulsa to South Tulsa and extending to East Tulsa. Through our Voluntary Vacant Property Acquisition and Redevelopment Program, we will target properties throughout the city, ensuring that development takes place in both underserved communities and high-opportunity areas. By focusing on expanding housing choices for those most in need while aligning with the city's long-term housing strategy, this proposal will help balance growth and address inequalities in access to housing.

Tulsa's **Housing Assessment** reveals key disparities across neighborhoods in terms of economic opportunity, housing quality, and access to amenities such as transit, healthcare, and employment. For example, **North Tulsa** experiences **higher rates of vacancy and blight**, and historically has lacked significant investment in affordable housing. However, **South Tulsa** and other high-opportunity areas present critical access to jobs, quality schools, and healthcare but have higher housing costs that make it difficult for low- and moderate-income families to live there.

Expanding Opportunity in Underserved Communities

The Housing Assessment's Subarea Analysis identifies that areas like North and East Tulsa are home to many low- to moderate-income households and persons of color who face higher barriers to affordable housing access and homeownership. Our proposal will directly address these inequities by promoting housing development that deconcentrates poverty and prevents displacement. By focusing on voluntary participation, the program ensures that properties are acquired with full owner consent, preventing the negative impacts of forced property transfers. Through collaborations with local community development organizations such as the Crossover Community Impact, Habitat for Humanity, Elevate East, and Invest North we will identify properties in these underserved neighborhoods for redevelopment. The redevelopment fund will subsidize site-prep/pre-development costs, including land acquisition, title clearing, and essential infrastructure improvements, ensuring these areas receive the necessary investment without displacing long-term residents. These properties will be rehabilitated or redeveloped as affordable homes and prioritized for local minority, women, and veteran-owned developers to promote equitable growth and community-based development.

Additionally, this program will employ **affirmative fair housing strategies** to market the newly developed homes to households historically denied access to these areas, ensuring that housing opportunities are expanded equitably for protected class groups.

Creating and Preserving Housing in High-Opportunity Areas

Simultaneously, the program will focus on developing housing in high-opportunity areas, as identified through the Housing Suitability Mapping Project. The mapping will provide data on where housing developments can maximize access to jobs, quality education, transit, healthcare, and other critical resources. This will allow for the strategic placement of new affordable housing units in areas that have historically been inaccessible to low-income households.

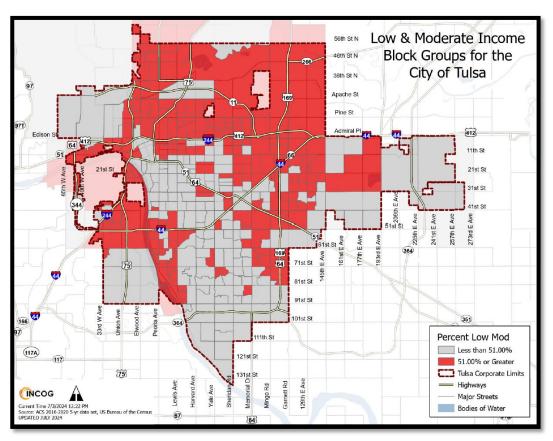
For example, **South Tulsa** offers high opportunity in terms of **employment and education**, but affordability has been a major barrier for underserved communities to access housing. Through the **Pre-Approved Plans Program** and the **Redevelopment Fund**, developers will be incentivized to build affordable housing in these neighborhoods, ensuring that low-income families can access high-opportunity areas. The **redevelopment fund** will cover costs associated with land acquisition and infrastructure improvements, providing developers with the resources necessary to construct housing that meets HUD's affordability standards.

The **SGA-led assessments** of zoning, land-use policies, and community engagement processes will help identify areas where the city's policies could be modified to encourage development in areas previously inaccessible to affordable housing. For example, policies around **density bonuses** and **mixed-use development** will be explored to ensure that affordable housing projects can integrate into **high-opportunity neighborhoods** seamlessly.

By combining **citywide zoning reforms**, community engagement, and targeted property acquisitions, the program will allow Tulsa to create **balanced housing development** across all neighborhoods, addressing both underserved communities and areas with greater economic and social opportunities.

Citywide Impact and Strategic Flexibility

While the proposal highlights specific areas of focus, such as North Tulsa, East Tulsa, and South Tulsa, the geographic scope remains broad. The Voluntary Vacant Property Acquisition and Redevelopment Program will allow for flexibility in selecting sites based on market demand, community input, and geospatial analysis, ensuring that the program's reach is adaptable to emerging opportunities citywide.



Additionally, through collaboration with **SGA** and the city's **Planning Office**, the **Housing Suitability Map** will be refined to reflect the city's evolving housing needs and economic development trends. The goal is to ensure that affordable housing is developed in areas where it can have the most positive long-term effects, whether through increasing access to high-opportunity zones or revitalizing underserved communities.

In terms of **program implementation**, Tulsa will not operate a subgrant program, but will instead develop **direct partnerships** with local developers and community-based organizations. Developers will follow a clear process involving **developer agreements** and **financial documentation** to ensure that projects meet the city's affordability and development standards.

Costs for title clearing, infrastructure improvements, and demolition will be covered by the city before lots are transferred, ensuring that development-ready properties are available without the burden of upfront costs for developers.

Soundness of Approach: iii.) Who are your key stakeholders? How are you engaging them? (5 points)

The development of this proposal is deeply rooted in the extensive stakeholder engagement process conducted throughout the creation of Tulsa's key housing initiatives, including the Tulsa Housing Strategy, planitulsa Comprehensive Plan, Citywide Housing Assessment, and the 2020-2024 Consolidated Plan. These efforts engaged a diverse range of stakeholders from across the city, ensuring that perspectives from all relevant sectors, particularly those most likely to benefit from the proposed activities, were considered and incorporated. Additionally, we will continue to engage these stakeholders and expand outreach throughout the grant's period of performance to ensure responsiveness to emerging needs.

Key Stakeholders and Outreach Efforts

Local and Regional Public Agencies:

- Tulsa Housing Authority (THA), PartnerTulsa, Tulsa Economic Development Corporation (TEDC), and other city agencies collaborated in the city-wide process to identify critical barriers to affordable housing production and preservation. These agencies provided crucial insights into infrastructure needs, zoning challenges, and strategies for leveraging public resources.
 - Example: Input from developers have consistently expressed frustration at the need for more flexible zoning codes to accommodate multi-family and missing middle housing, which has been incorporated into our policy reform activities.

Housing Developers and Builders:

- Engagement with both nonprofit and private developers, including local minority- and women-owned businesses, was central to identifying practical barriers in housing development. Developers like Tulsa Housing Authority, Habitat for Humanity, and professional members of the Greater Tulsa Association of Realtors, and Home Builders Association of Greater Tulsa have offered feedback on permitting inefficiencies and financing gaps that hinder affordable housing production.
 - Example: Through these discussions, the need for **technical assistance and capacity-building** for minority developers emerged, leading to the inclusion of partnerships with PartnerTulsa and TEDC to support these developers.

Community Organizations and Advocacy Groups:

- Organizations such as A Way Home for Tulsa, Mental Health Association Oklahoma,
 Crossover Community Impact, Habitat for Humanity, InvestNorth and Elevate East
 have offered feedback to inform the development of the proposal to address the housing
 needs of vulnerable and underserved populations, including low-income residents, people
 of color, and homeless individuals. Their feedback emphasized the importance of
 maintaining affordability in high-opportunity areas and preventing displacement.
 - Example: A Way Home for Tulsa's involvement directly influenced the proposal's focus on preventing displacement and ensuring that affordable units are created in well-resourced neighborhoods.

Residents and Community Members:

- Engagement through community surveys, town halls, and public forums organized by the **Tulsa Planning Office** during the development of planitulsa and the Citywide Housing Assessment allowed direct input from residents, including those in need of affordable housing and individuals from protected class groups under the Fair Housing Act.
 - Example: Feedback from residents in **North Tulsa** stressed the need for revitalization without displacement, shaping our **Voluntary Vacant Property Acquisition Program**, which ensures properties are acquired through a voluntary, community-centered process.

Strategy for Continued Engagement During the Grant Period

To ensure the ongoing success of the proposed activities, we have established a robust, multifaceted engagement strategy that will be maintained and expanded throughout the grant's period of performance:

- Quarterly Stakeholder Meetings: The City will host quarterly meetings with local developers, community groups, and public agencies to review the progress of the proposal's activities, gather feedback, and adjust strategies based on real-time needs and market conditions.
- Targeted Outreach to Underserved Communities: Through partnerships with community development organizations like Elevate East, InvestNorth, Growing Together, Habitat for Humanity, and Crossover Community Impact, the City will ensure that engagement efforts are inclusive of all people, especially residents in areas of North and East Tulsa. These outreach efforts will provide residents and community leaders with updates on the availability of affordable housing opportunities and ensure that feedback continues to inform the execution of the proposal.
- Capacity-Building for Minority Developers: Through TEDC and PartnerTulsa, the City will offer ongoing technical assistance and training for minority and mission-driven developers, helping them navigate complex projects and financing opportunities. This will ensure that developers from underrepresented groups remain involved in shaping the housing landscape.

Specific Actions to Solicit Input from Stakeholders

Throughout the proposal development process, several specific actions were taken to ensure comprehensive stakeholder input:

- Public Surveys and Focus Groups: As part of the Citywide Housing Assessment and planitulsa, the City conducted several surveys and focus groups. Over 1,400 respondents to the 2020 Housing and Neighborhoods Policy Survey and provided input on key housing challenges, including affordability, access to transportation, and the impact of zoning regulations. This feedback directly shaped the activities proposed in this grant, particularly in addressing housing needs in high-opportunity areas.
- Engagement with the Development Community: The City held workshops with local developers, both nonprofit and private, to identify barriers in the permitting and approval processes. These workshops led to the inclusion of streamlined permitting and preapproved plans as key components of this proposal.
- Collaboration with Advocacy and Service Organizations: Regular consultations with organizations representing underserved populations, such as A Way Home for Tulsa, Mental Health Association Oklahoma, and Crossover Community Impact, ensured that the proposal prioritized the needs of homeless individuals and those at risk of homelessness. Their feedback led to the inclusion of affordable housing strategies that target those earning 80% of AMI or less.

Incorporation of Stakeholder Input

Stakeholder engagement has profoundly shaped this proposal, both in terms of its focus and the structure of its activities. Key examples of how stakeholder input has been incorporated include:

- Focus on Voluntary Acquisition and Preventing Displacement: Input from community organizations in North Tulsa emphasized the importance of preventing displacement in areas experiencing redevelopment. As a result, the Voluntary Vacant Property Acquisition Program was designed to acquire properties only with full owner consent, ensuring that communities are not adversely affected by redevelopment.
- Capacity-Building for Minority Developers: Feedback from minority-owned developers, along with organizations like PartnerTulsa and TEDC, underscored the challenges they face in scaling their operations. In response, we integrated targeted capacity-building programs that provide financial support and technical assistance to minority and mission-driven developers.
- Streamlined Zoning and Permitting Processes: Developers and public agencies highlighted inefficiencies in zoning and permitting that delayed affordable housing projects. Based on this input, the proposal includes zoning code updates and a Pre-Approved Plans Program to expedite the development process, especially in high-opportunity areas.

Affirmatively Furthering Fair Housing (AFFH)

This proposal is fully aligned with HUD's goals of affirmatively furthering fair housing by removing barriers to affordable housing, promoting desegregation, and ensuring equitable access to well-resourced areas of opportunity for protected class groups. Stakeholder input, particularly

from housing advocates and protected class groups, guided the emphasis on affirmative fair housing strategies that will ensure newly developed homes are accessible to communities historically denied access. Our focus on North and East Tulsa ensures that housing developments are created equitably across the city, promoting racial and economic integration in well-resourced areas.

Tulsa has been investing heavily in inclusive growth strategies, particularly in areas like East Tulsa and North Tulsa, which have been historically underserved. These regions have faced systemic challenges, from the aftermath of the 1921 Tulsa Race Massacre in Greenwood to decades of disinvestment and discriminatory housing policies. The construction of highways in the mid-20th century further fragmented these communities, leading to economic decline and displacement. In recent years, however, community-driven initiatives and investments have aimed to reverse these trends (PlaceBasedImpact) (Economic Architecture Project).

East Tulsa, for example, has become a hub for immigrant communities, and organizations like the George Kaiser Family Foundation (GKFF) have been key in supporting inclusive growth through initiatives like the **Elevate East** program. This effort involves partnerships with community organizations to build culturally relevant infrastructure, including small business incubators and affordable housing developments, to ensure long-term growth while preventing displacement (<u>PlaceBasedImpact</u>).

In North Tulsa, efforts have centered on balancing new investments with community preservation. **Invest North** and other local organizations are working to ensure that new housing developments in North Tulsa not only provide affordable housing but also include protections against gentrification that could displace long-term residents. The city has also adopted strategies, such as partnering with **Trust Neighborhoods** and establishing community land trusts, to maintain affordability and control over property values, reducing the risk of displacement caused by rising rents (<u>Economic Architecture Project</u>).

Soundness of Approach: iv.) How does your proposal align with requirements to affirmatively further fair housing? (5 points)

The City of Tulsa's PRO Housing proposal addresses systemic barriers to affordable housing, building upon the Tulsa Housing Strategy and the 2020-2024 Consolidated Plan. By focusing on well-resourced areas, the program ensures that low- and moderate-income households—particularly underserved groups—gain access to essential services such as transportation, quality schools, and healthcare.

Data-Driven Approach to Addressing Housing Needs

Tulsa's **Citywide Housing Assessment** reveals a high vacancy rate in North Tulsa (nearly 23%), contributing to the area's significant housing inequities (2023 <u>Tulsa Equality Indicators</u>) Black homeownership in the city also lags behind at just 36% compared to 59% for white

households, further emphasizing the need for equitable housing interventions (<u>Equality Indicators</u>).

To support fair housing and promote desegregation, the City of Tulsa will work with SGA as part of their Technical Assistance and planning support to pursue strategies that lead to additional land use and zoning reforms that encourage higher density development in traditionally exclusionary neighborhoods. This includes updating zoning codes to allow for the construction of accessory dwelling units (ADUs), duplexes, and triplexes in areas historically limited to single-family homes. These **policy reforms** will expand housing choice for low-income families and protected class groups in high-opportunity areas

Voluntary Vacant Property Acquisition and Development Program

The program will leverage vacant properties in high-opportunity areas for redevelopment into affordable housing, ensuring that historically underserved groups—particularly Black and Hispanic households—have access to these neighborhoods. A **redevelopment fund** will be used to defray costs for site improvements, including **ADA-compliant infrastructure** and upgrades essential to making affordable housing projects financially feasible for developers.

Ensuring Accountability and Community-Led Decision-Making

To ensure community voices are central to decision-making, the City will establish an **Advisory Committee** comprising local residents, developers, housing advocates, and city officials. This committee will oversee zoning reforms, track the progress of affordable housing initiatives, and provide quarterly public reports on outcomes related to racial desegregation and access to opportunity. Working groups will also be established to ensure effective collaboration, streamlined decision-making, and the successful implementation of key project activities.

Performance Tracking and Equity Metrics

The City will evaluate the impact of the program through **equity-based performance metrics**, including:

- Racial and economic diversity of new affordable housing beneficiaries.
- Geographic distribution of affordable housing units, ensuring at least 40% of new units are in high-opportunity areas by year two.
- Compliance with ADA standards for all new developments.

Upon establishing a strategy and associated mechanisms for impact measurement with support from SGA's technical assistance, annual reports, published publicly, will track these outcomes and inform adjustments to ensure that the City is advancing HUD's AFFH objectives. By focusing on underserved communities, preventing displacement, and ensuring that new developments meet the needs of protected class groups, the City of Tulsa will advance HUD's goals of racial equity, accessibility, and affordability throughout its housing ecosystem.

Soundness of Approach: v.) Budget and Timeline Proposals (5 points)

The proposed budget of \$5,758,128.20 for the City of Tulsa's PRO Housing activities supports the core components of Tulsa's affordable housing strategy. It covers acquisition, development, and personnel costs for the Housing Project Coordinator and Housing Strategy Coordinator, both of which are essential for planning and implementation.

The project spans the **5-year period of performance** from **02/10/2025 to 09/30/2030**. The timeline allows for an efficient planning phase, followed by phased implementation. This phased structure allows for real-time assessment, ensuring the project remains cost-effective and adaptive to emerging needs.

PRO Housing Grant Budget Overview

- Acquisition and Development (\$4,000,000):
 - This includes acquiring lots, title clearing, demolition, and infrastructure repairs for 40 units (20 rehabbed and 20 newly constructed).
- Personnel Costs (\$1,234,662):
 - These support key roles over the 6-year project period to ensure strategic execution and coordination.
- Administrative Costs (10% of total budget):
 - \$523,466.20 for administrative overhead to ensure smooth project management.

Item	Per Unit Cost	No. of Rehab Unit	No. of s New Units	otal Development Cost
Lot Acquisition	\$ 30,000.00	20	20	\$ 1,200,000.00
Legal Costs (Title Clearance)	\$ 5,000.00	20	20	\$ 200,000.00
Demolition (New Construction Only)	\$ 10,000.00	0	20	\$ 200,000.00
Infrastructure Repair (50% of units)	\$ 120,000.00	10	10	\$ 2,400,000.00
Total Development Costs				\$ 4,000,000.00

Position	Annual	Total (6 Years)
Housing Project Coordinator Salary (1 FTE)	\$ 79,145.00	\$ 474,870.00
Housing Strategy Coordinator Salary (1 FTE)	\$ 79,145.00	\$ 474,870.00
Fringe Benefits (30%)	\$ 47,487.00	\$ 284,922.00
Total Personnel Costs	\$ 205,777.00	\$ 1,234,662.00

Item	Total Cost
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Development Costs	\$4,000,000.00
Personnel Costs	\$1,234,662.00
Administrative (10%)	\$ 523,466.20
Total PRO Housing Grant Funds	\$ 5,758,128.20

Timeline Overview

The project timeline ensures that activities begin promptly after the start date and progress through a structured and phased process.

Planning and Early Implementation Phase (Q1 2025 - Q3 2025)

- Q1 2025: Hiring and onboarding of the Housing Project Coordinator and Housing Strategy Coordinator. Initial collaboration with Smart Growth America (SGA) to launch zoning assessments and process improvement planning. Stakeholder engagement and community consultations begin.
- Q2-Q3 2025: SGA completes zoning code reviews, process evaluations, and system recommendations. Work with the City Planning Office and key stakeholders to refine implementation strategies for zoning reforms and Vacant Property Acquisition Program. Pre-Approved Plans Program development begins, coinciding with staff hiring and zoning assessment.

Pre-Approved Plans Program RFP Execution (Late 2024 - Q1 2025)

- Q4 2024: Execute the Pre-Approved Plans Program RFP to select a design firm.
- Q1 2025: Design and program development begin alongside the hiring process for the two new coordinators.

Property Acquisition and Development Phase (Q4 2025 - Q4 2027)

- Q4 2025: Property acquisitions and rehabilitation work commence.
- Q1-Q2 2026: Acquisition of 10 properties; title clearing, demolition, and infrastructure work for the first phase of housing developments. Rehab of 10 housing units and construction of 5 new units. The Pre-Approved Plans Program rolls out with a focus on small-scale infill developments.
- Q3-Q4 2026: Scale Vacant Property Acquisitions and continue rehab and new construction. Complete 10 units (rehab and new construction).

Scaling and Strategic Adjustments (2027)

- Q1-Q2 2027: Begin next acquisition round, targeting an additional 10 properties. Make necessary adjustments based on feedback from the advisory committee and stakeholders.
- Q3-Q4 2027: Complete another 10 units, bringing the total to 20 units completed.

Full Project Development (2028-2029)

• 2028-2029: Continue to acquire properties and develop housing units, completing the remaining 20 properties (10 rehabbed and 10 new). Maintain stakeholder engagement and implement any final adjustments to ensure the success of zoning reforms and affordable housing production.

Closeout and Final Reporting (Q1-Q3 2030)

• Q1-Q3 2030: Closeout of all property acquisition, construction, and rehab work. Submit final HUD reports detailing housing outcomes, community impacts, and project successes. Ensure all financials and compliance documentation are completed and submitted.

Budget and Management for Potential Reduced Funding

If HUD awards only 50% of the requested funding, the City of Tulsa will adjust the scale of the affordable housing development under the proposed *Voluntary Vacant Property Acquisition & Development program* while preserving the essential components that drive the program's success. The core personnel—**Housing Strategy Coordinator** and **Housing Project**Coordinator—will remain fully funded to ensure continued alignment with the City's housing strategy and the execution of the broader proposal objectives.

Under the **50% funding scenario**, the City will scale down housing unit development to a total of **15 units**: **7 rehabilitated units** and **8 newly constructed units**. The program will emphasize maximizing cost-efficiency by focusing on rehabilitation where possible, as it tends to be more affordable compared to new construction. Even in this reduced funding environment, the City will ensure that these units meet affordability standards for households earning at or below **80% of the Area Median Income (AMI)**.

Development Costs Breakdown

- Lot Acquisition: A total of 15 lots will be acquired at a cost of \$30,000 per lot, totaling \$450,000.
- Legal Costs: Title clearance for these 15 units is estimated at \$5,000 per unit, amounting to \$75,000.
- Demolition (New Construction Only): Demolition costs are projected for 2 units at \$10,000 per unit, totaling \$20,000.
- Rehabilitation Costs:
 - 4 units will undergo rehabilitation without infrastructure repairs, at a cost of \$75,000 per unit, totaling \$300,000.
 - o **3 units** will require both rehabilitation and infrastructure repairs, at a combined cost of \$195,000 per unit, totaling \$585,000.
- New Construction Costs:

- o 1 new unit without infrastructure repair is estimated to cost \$150,000.
- o 1 new unit requiring both new construction and infrastructure repair is projected to cost \$270,000.

Personnel and Administrative Costs

- Personnel Costs: Personnel costs remain at \$1,234,662 to support the Housing Project Coordinator and Housing Strategy Coordinator, ensuring essential project oversight and successful implementation of all housing initiatives.
- Administrative Costs: Administrative costs, which are calculated at 10% of the total project cost, will be reduced to \$287,906.41 to align with the scaled-back budget.

Total Project Costs:

Development Costs: \$1,305,000
Personnel Costs: \$1,234,662

• Administrative Costs (10%): \$287,906.41

Total Project Cost: \$2,879,064.10

Scaling and Prioritization

Even with a 50% reduction in funding, the City will deliver impactful housing outcomes through a focused and strategic approach. To ensure cost-efficiency, the project will:

- **Prioritize rehabilitation** over new construction, as rehabilitation is often more cost-effective.
- Focus new construction efforts on lots with manageable infrastructure and demolition costs to reduce overall project expenses.
- Retain a **geographic focus** on high-opportunity areas with existing infrastructure to minimize additional costs, while ensuring that affordable housing units are well-placed in transit-accessible, resource-rich neighborhoods.

The **Housing Strategy Coordinator** and **Housing Project Coordinator** are critical to maintaining the overall structure of the proposal and will continue to lead the project's efforts to align with HUD's objectives, engage stakeholders, and oversee the development process. These roles are indispensable for the success of the project, ensuring that even with reduced funding, the City can deliver cost-effective housing solutions that meet Tulsa's affordability goals.

Quarterly Reporting and Financial Monitoring:

The City of Tulsa will comply with all HUD quarterly reporting requirements through the Disaster Recovery Grant Reporting (DRGR) system. This includes tracking milestones, financial disbursements, and project outcomes in compliance with HUD's regulations. The City's Grants

Administration Division will be responsible for ensuring timely and accurate reports and for monitoring project financials in accordance with 2 CFR Part 200.

Conclusion

Under a 50% funding scenario, the City of Tulsa will still successfully develop **15 affordable housing units**, focusing on both **rehabilitation** and **new construction** to ensure that affordable housing remains accessible to households at or below **100% of AMI**. The City's approach will prioritize strategic property acquisitions and cost-efficient development, ensuring that the critical components of the project—such as infrastructure repair and long-term affordability—are maintained. Even with reduced funding, the City will continue to address the urgent need for affordable housing in a way that maximizes impact and efficiency.

Exhibit E Capacity.

Capacity: i.) What capacity do you and your partner(s) have? What is your staffing plan? (10 points)

Organizational Structure and Key Personnel

In addition to the two newly funded roles—the Housing Project Coordinator and the Housing Strategy Coordinator—the City of Tulsa will leverage its existing management structure to ensure the necessary expertise is in place for implementing the Tulsa Housing Ecosystem Transformation Initiative. The Housing Office will collaborate with the Planning Office, Code Enforcement, and Development Services, ensuring that each project component is managed by a team with direct experience in housing development. This cross-departmental collaboration adds significant capacity, ensuring efficient planning, permitting, and execution of housing projects.

Under the leadership of the Housing Officer, the City of Tulsa's **PRO Housing grant-funded** *Housing Project Coordinator* and *Housing Strategy Coordinator* will lead the implementation of the PRO Housing activities, ensuring alignment with HUD objectives. The Housing Project Coordinator will manage day-to-day project execution, while the Housing Strategy Coordinator will focus on integrating recommendations from Smart Growth America and coordinating with city departments and external partners. TEDC and PartnerTulsa will assist in property acquisition and development, but the City will retain full oversight and management of all activities.

The City's acquisition activities, including the Voluntary Vacant Property Acquisition Program, will be managed by PartnerTulsa, the umbrella organization created to consolidate economic and urban development efforts in the city. PartnerTulsa is legally structured as a public trust, which operates in close coordination with the City of Tulsa but remains independent. This structure ensures that it has the legal authority and capacity to manage land acquisition and asset management for public projects, including those funded through federal

programs like PRO Housing. PartnerTulsa staffs and supports the operations of the Tulsa Development Authority (TDA), which will be specifically responsible for acquiring and managing properties under the housing initiative. This relationship provides a streamlined process that ensures compliance with federal guidelines while maintaining efficient control of assets throughout the lifecycle of the program.

Furthermore, **Housing Forward**, a new subsidiary nonprofit launched by the Anne and Henry Zarrow Foundation, will play a key role in capacity building. **Housing Forward** is tasked with attracting larger-scale developers to Tulsa and providing technical assistance to local developers, especially those engaged in affordable housing production. This partnership will be crucial in expanding developer capacity and ensuring that the city can meet its ambitious housing goals.

The City has also planned to contract with **Smart Growth America (SGA)**, a national leader in housing policy and urban development. SGA will provide technical assistance for system-level improvements, including comprehensive zoning code assessments, housing suitability mapping, and the creation of a coordinated stakeholder engagement system. These efforts will be managed through the new Housing Strategy Coordinator, ensuring SGA's recommendations are fully integrated into Tulsa's long-term housing strategy.

Capacity for Project Management, Financial and Procurement Oversight

A critical component of the City's capacity to manage federal grants is the **Grants Administration division**, which handles all HUD-related reporting, monitoring, and financial oversight for the City's entitlement grants (CDBG, HOME, ESG, etc.). The division will play a central role in administering the financial aspects of the PRO Housing program, ensuring compliance with federal regulations and maintaining accurate records for auditing purposes.

The City of Tulsa has robust procurement systems and an internal compliance review process that ensures adherence to **2 CFR Part 200 federal regulations**. These systems, which include selecting contractors and ongoing monitoring of subrecipients, were successfully used for large-scale projects like the administration of federal stimulus funding during the COVID-19 pandemic. The City will leverage these systems for this proposal, ensuring efficient procurement and financial oversight for the program.

The City has an established vendor and partner management process that ensures roles and responsibilities are clearly defined through subrecipient agreements. This includes mechanisms for reporting and performance evaluation, which will also apply to partners such as **TEDC** and **PartnerTulsa** to ensure compliance with federal standards while implementing their parts of the proposal.

Environmental Review Compliance

All proposed activities will undergo environmental reviews per NEPA, HUD Environmental Review Procedures (24 CFR Part 58), and other relevant regulations. The Planning Office, in partnership with the Department of City Experience (DCE), will lead this process. Environmental assessments (EA) and necessary documentation will be prepared to ensure full

compliance before any construction or rehabilitation commences. This ensures all projects meet HUD's environmental standards and protect future residents.

Process for Property Acquisition, Preparation, and Transfer (No Subgrant and No Program Income)

1. Acquisition and Preparation

The Tulsa Development Authority (TDA) will acquire and prepare vacant properties in high-opportunity areas. Pre-development costs—including lot acquisition, title clearing, demolition, and infrastructure repairs—will be funded by the City and handled directly by TDA. Importantly, no funds will be subgranted to developers, ensuring full City control over the acquisition and preparation process, in compliance with HUD regulations. All activities will be managed internally, ensuring no funds are passed directly to private entities, maintaining compliance with HUD's subgrant and program income rules.

2. Developer Selection and Property Transfer

Once properties are prepared, TDA will solicit developers through a formal Request for Proposal (RFP) process. Developers will submit proposals to acquire the pre-developed properties for affordable housing construction under **redevelopment agreements**. The properties will be transferred at nominal costs to facilitate affordable housing production, **ensuring no program income is generated**. The City's goal is to enable housing development in line with HUD's objectives, not to generate revenue from the property transfers.

3. Redevelopment Agreements

TDA will establish legally binding redevelopment agreements with developers, ensuring they meet affordability and construction timelines. Each agreement will include affordability covenants that ensure properties serve low- to moderate-income households for an extended period, promoting long-term affordability.

Partner Capacity and Coordination

The City of Tulsa has a strong history of collaboration with public and private partners, which will be a core strength of this proposal. Key partners include **TEDC**, **PartnerTulsa**, and **Housing Forward**, each of which brings unique capabilities to the table.

- **TEDC**, as a certified Community Development Financial Institution (CDFI), plays a critical role in addressing developer capacity barriers by providing financial resources and assistance to local developers, especially minority- and women-owned firms.
- **PartnerTulsa** will oversee the acquisition of vacant properties through the TDA, ensuring the efficient transfer of development-ready land to developers. This seamless integration between PartnerTulsa's asset management and TEDC's financial capacity ensures that developers have the resources and land needed for project success.
- **Housing Forward** will provide critical capacity-building support to local developers, particularly those new to affordable housing development, and help attract national developers to Tulsa. This will assist the City in overcoming capacity limitations that currently impede housing production.

The City and its partners will utilize clear subrecipient agreements and coordinated project planning to ensure that all partners meet the high standards expected for federal grant management.

Experience with Civil Rights and Fair Housing

The City of Tulsa has long-standing experience integrating civil rights and fair housing into its housing development activities. The **Mayor's Office of Resilience and Equity (MORE)** leads many of these initiatives, working to address disparities in housing access, particularly for communities of color and other protected classes. MORE has also developed and implemented the **Language Access Policy** and the **Equality Indicators Report**, which tracks disparities in housing and economic mobility across Tulsa's neighborhoods.

Fair housing and equity considerations are central to the City's **Tulsa Housing Strategy**, which prioritizes expanding housing choice in high-opportunity areas and preventing displacement. The City's experience in fair housing education and enforcement ensures that the PRO Housing program will comply with the Fair Housing Act, while also advancing racial equity and economic mobility for underserved communities.

Managing Scaling and Reductions in Funding

In the event of partial funding, the City will prioritize the activities with the most immediate and long-term impact on affordable housing production. The two key staffing positions—the Housing Project Coordinator and the Housing Strategy Coordinator—will remain essential and will be maintained under any funding scenario. If HUD awards less funding than requested, the City will scale back certain property acquisition components, particularly the Voluntary Vacant Property Acquisition Program. However, the core activities, such as streamlining zoning and permitting processes, supporting minority developers, and building developer capacity through **Housing Forward**, will proceed as planned to ensure sustained improvements in affordable housing production.

Exhibit F. Leverage

Leverage: i.) Are you leveraging other funding or non-financial contributions? (10 points)

Leverage information and supporting documentation will be provided once letters of commitment from key partners have been fully executed and submitted. This section will be updated accordingly to reflect the confirmed leverage contributions and commitments.

Exhibit G. Long Term Effects and Outcomes

Long Term Effects & Outcomes: i.) What permanent, long-term effects will your proposal have? What outcomes do you expect? (10 points)

The City of Tulsa's PRO Housing proposal is designed to have a lasting impact on the housing ecosystem by addressing deeply embedded structural barriers to affordable housing production and preservation. The long-term vision centers on permanently removing the critical barriers of developer capacity limitations, outdated zoning and land-use policies, and financial feasibility challenges. By removing these barriers, Tulsa will not only increase its current affordable housing production but also ensure sustained development and preservation well into the future.

Upon completion of the grant-funded activities, the City will have significantly enhanced the capacity of both local and national developers to produce affordable housing, reformed zoning and permitting processes to accelerate development, and created a robust pipeline for the acquisition and redevelopment of vacant properties. These achievements will be realized through multiple strategic components of the proposal, each with long-lasting effects on Tulsa's ability to generate and sustain affordable housing at scale.

Permanent Removal of Barriers and Sustained Production

Developer Capacity Limitations The grant will address the long-term developer capacity challenges by building a more resilient network of nonprofit, minority-owned, and national developers. The collaboration with Housing Forward will bring national expertise to Tulsa, attracting new developers while expanding the capacity of local and underrepresented groups through technical assistance and capacity-building programs in partnership with TEDC and PartnerTulsa. This capacity-building infrastructure will ensure that Tulsa has a larger and more diverse pool of developers capable of managing the complexities of affordable housing production. Long after the grant period, these developers will continue to contribute to the city's affordable housing goals, having gained the financial and operational skills necessary to participate in major projects. This expanded developer ecosystem will lead to sustained affordable housing production beyond the grant period, ensuring that the housing pipeline continues to grow even as market conditions fluctuate.

Outdated Zoning and Inefficient Processes The reforms to Tulsa's zoning and permitting processes will provide long-term, structural changes that will support the ongoing production of affordable housing. The Housing Strategy Coordinator, in partnership with Smart Growth America (SGA), will lead efforts to streamline processes, allowing for greater density, expedited permitting, and the introduction of housing types such as accessory dwelling units (ADUs), duplexes, and triplexes. These reforms will make it easier for developers to pursue affordable housing projects without being bogged down by outdated or restrictive regulations. Long after the PRO Housing grant period ends, these zoning reforms will continue to support housing

production, particularly in high-opportunity areas where housing supply has historically been limited due to restrictive zoning.

By reducing permitting times and increasing flexibility for innovative housing solutions, the City will not only meet short-term housing goals but will also position itself for long-term success in producing housing that meets the evolving needs of its population. Over time, these regulatory reforms will facilitate faster and more efficient affordable housing production, allowing the City to meet its target of 13,000 new units in the next decade.

Economic Feasibility and Financial Gaps The proposal's Voluntary Vacant Property Acquisition Program, combined with the Affordable Housing Priority Program, will establish a new framework for affordable housing development that eliminates significant financial barriers. By acquiring and preparing vacant properties in high-opportunity areas, the City will reduce land acquisition costs for developers, which have historically been a major barrier to affordable housing production. The program will also address legal and infrastructure challenges, ensuring that developers have access to development-ready sites that meet the criteria for affordable housing. This approach not only increases housing production in the short term but also provides a replicable model for future property acquisitions and redevelopments.

The Affordable Housing Priority Program will streamline the process of securing subsidies and other financial supports, ensuring that developers have the resources necessary to bridge funding gaps. This will permanently reduce the financial burden on developers, making it more feasible to construct affordable housing in areas where land costs and infrastructure issues have traditionally limited production. By reducing financial barriers, the proposal will ensure that developers can continue to pursue affordable housing projects even after the grant period, increasing the city's housing stock over the long term.

Achievements and Long-Term Outcomes

At the end of the period of performance, Tulsa will have achieved the following:

- 1. The rehabilitation and new construction of 40 affordable housing units through the Voluntary Vacant Property Acquisition Program. This initial phase will create a replicable model for future developments, ensuring that more units are produced over time.
- 2. **Long-term zoning and permitting reforms** that will reduce approval times, allow for higher density, and encourage the development of missing middle housing. This will result in a measurable increase in the number of homes permitted annually and a reduction in the average time to issue permits.
- 3. The establishment of a sustainable developer capacity-building infrastructure, including TEDC and PartnerTulsa's programs for minority developers. These programs will continue to provide technical assistance and financial support, ensuring that local developers can compete for affordable housing projects and contribute to the city's housing goals.

4. The creation of a formalized structure for stakeholder engagement, ensuring that key housing ecosystem partners—developers, government agencies, community organizations, and advocacy groups—remain engaged in the long-term planning and implementation of housing strategies.

Replicability and Model for Other Communities

Tulsa's approach represents a scalable model for other communities facing similar barriers to affordable housing production. By addressing zoning, permitting, developer capacity, and financial feasibility simultaneously, Tulsa's PRO Housing proposal offers a comprehensive, replicable solution to long-standing housing challenges. Other jurisdictions can adopt Tulsa's approach by investing in capacity-building programs, streamlining regulatory processes, and creating property acquisition programs that prioritize affordable housing in high-opportunity areas. The City's use of Smart Growth America's technical assistance and the focus on minority developer inclusion also serve as key components that other communities can replicate to promote equity and sustainability in housing development.

Success Metrics and Target Outcomes

By the end of the performance period, the following metrics will serve as indicators of success:

- 50% reduction in the time required to issue permits for affordable housing developments, resulting from process reforms led by the Housing Strategy Coordinator.
- **40 housing units completed** within the first two years of the program, with a framework in place to replicate and scale these efforts to meet the City's long-term housing goals.
- **Increased participation by minority developers**, with at least 30% of the total units produced under the program developed by women- or minority-owned firms.
- Increase in the number of properties in high-opportunity areas redeveloped as affordable housing, providing low- and moderate-income families with access to better educational, employment, and healthcare opportunities.

Expanding Access and Reducing Segregation

The long-term effect of the proposal will be a measurable reduction in the concentration of poverty and a more equitable distribution of affordable housing across the city. By prioritizing the redevelopment of vacant properties in well-resourced neighborhoods, the program will increase access to high-opportunity areas for protected class groups and vulnerable populations, furthering HUD's goal of promoting desegregation and equitable access to housing. The regulatory reforms, combined with financial and capacity-building supports, will remove barriers that have historically inhibited access to housing in desirable neighborhoods, leading to more integrated communities and increased housing choice for all.

Overall, Tulsa's PRO Housing proposal is a transformative approach that will create permanent, structural changes in the city's housing ecosystem. By addressing key barriers and ensuring that the necessary capacity, regulatory reforms, and financial supports are in place, the proposal will result in sustained affordable housing production and preservation well beyond the grant period.