

TULSA SUBDIVISION REGULATIONS UPDATE

PUBLIC REVIEW DRAFT COMMENT LOG

No.	Source	Section or Page	Issue (Question, Comment or Suggestion)	Response
1	HBA	1-070.3 – Page 1-2	Typo - text 'no', s/b 'not'	Revised as requested
2	HBA	1-080.3 – Page 1-3	County Engineer is included in DEFINITIONS. Should A., B., and D. be included? Or County Engineer stricken from definitions?	Revised as requested; "County Eng." definition deleted
3	HBA	1-080.3.E – Page 1-3	NEW SECTION/SUBSECTION. E.	No change requested
4	HBA	1-100 – Page 1-5	NEW SECTION Typo - text 'if', s/b 'is'	Revised as requested
5	HBA	5-010 – Page 5-1	NEW SECTION Footnote reference- <i>This proposed text reflects a proposal to eliminate the mandatory "platting" requirements</i> – SEE PROPOSED AMENDMENTS TO TULSA ZONING CODE 70-080-B (END OF DRAFT).	No change requested
6	HBA	5-020.3 – Page 5-2	Plan/Plat usage throughout text? March 2017 = subdivision plan May 2017 = subdivision plat	No change requested; "plat" is used throughout
7	GP	5-030.3 A Blocks – length	What is the definition of a major street? Is this a primary arterial? A freeway? Or a secondary arterial street? 1,500 is more than 1/4 mile. This appears to limit street connectivity and could hamper the creation of walkable areas. In some contexts, it's desirable for cars on arterial streets to move slowly. Can we create a context-sensitive solution where smaller blocks are allowed along major streets, especially in conjunction with main streets, mixed-use corridors, neighborhood centers, etc. where walkability is the goal?	"major street" defined in "definitions" chapter—"Street, Major" See also No. 8, below
8	GP	5-030.3 B Blocks – length	Limit block length to 650' to incentivize more efficient land use and encourage walkable, bikeable places. Allowing 1,500 long blocks incentivizes motorists to speed through neighborhood streets, while making other forms of transportation impractical.	New proposed text would establish maximum block length limits ranging from 650 feet to 1,500 depending on the density (i.e., lot width) of development
9	HBA	5-030.3.B and C – Page 5-2	There needs a more favorable process than plat waiver, interpretation issue. Block length of 1,500 feet should be allowed. Shorter length constrains layout and yield, there has to be a different treatment of the subdivision perimeter. Rationale for length? Was cul-de-sac length applied to block length?	Revised text establishes longer minimum block length (1,000 feet) for suburban character development (lots of 60 to 150 feet in width)
9-1	GP	5-030 (Block length)	Maximum block length for minor streets in residential subdivisions should remain at 1,500 feet.	See No. 8, above
10	GP	5-030.3 D Blocks – length	If you need traffic calming on neighborhood streets, the block is too long and the street is too wide. You don't need traffic calming, you need a more appropriate design, including a compact street grid and narrower streets.	Express authorization for decision-making bodies to require provision of traffic calming measures has been retained
11	HBA	5-040.2 – Page 5-3	Prohibition of flag lot is unacceptable. Propose limitation of the number of access points based on lot size that you have to be within 50% (min. width). This will limit new development in infill areas. Anything that increases the peak and access points to an arterial. S/D waiver required for flag lot INCOG is currently receptive to	Prohibition of flag lots is not new; no change made; future flag lot

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			waivers, but what about future. County does not want to build new roads, county allows design flexibility.	requests handled through modification process, as is the case today
12	HBA	5-050 – Page 5-4 thru 5-7	MF isn't the only reason for trip generators, address them all or not at all. City Council directed item, 1 of 4 post-adoption zoning code issues / aka to stormwater improvement requirements for traffic, city should know where they're located. City should be responsible for street improvements. As written this only applies to multi-family (MF) MF=anything more than 3 or 4 dwelling units. Traffic study is \$6,000 and cost increases with complexity, in addition to weeks of delay. Limited credible consultant availability. Interpretation will be restrictive in engineering fashion. Daily peaks account for 1,000 vehicles/day would be easily met for a 100 lot development?? Shopping centers, QTs, churches are major trip generators – why just MF? Limiting TIA doesn't address the overall issue of trip generators NOTE: Section 5-050.7 Improvement Requirements / new text language authorizing city council or board of county commissioners to require that the applicant participate in funding their proportionate fair-share (bridges, street widening, intersections, street lights) of on- or off-site improvements to mitigate traffic congestion and traffic safety impacts resulting from the proposed development. \$5m to widen a one mile stretch of road.	Revised as requested to require traffic studies for all large (residential and nonresidential) projects.
13	GP	5-050.2 Traffic Impact Analyses	Good idea to require transportation impact analysis for large developments generating significant traffic. This analysis could save the city millions of dollars by preventing inappropriate density being added to areas without adequate transportation infrastructure and options. (The upcoming Mingo Ave street widening project is a good example.)	No change requested
14	GP	5-050.3 Level of Service Standards	Is this related to car-only LOS? Is there any way to emphasize and support improvements to pedestrian, bicycle and transit infrastructure "level of service?"	Added language requiring consideration of non-motorized transportation impacts
15	GP	5-050.4	Good	No change requested
16	GP	5-050.6 A-E	Good	No change requested
17	GP	5-050.7	Do these improvements only apply to improvements for auto travel? Could it also include appropriate improvements to pedestrian, bicycle or transit infrastructure? (Sheltered bus stop, crosswalk with light, bike connections, etc)	Added language requiring consideration of non-motorized transportation impacts
17-1	GP	5-050 (TIA)	Opposed. Requiring a TIA at the time of application for rezoning will require that a Site Plan be developed prior to making the application. Requiring that a Site Plan and a TIA be done before one can apply for zoning means the developer is spending considerable funds before he even purchases the property.	TIA requirements have been retained in draft
18	HBA	5-060.2 – Page 5-7	New text added ' <u>an approved means of</u> ' access. What defines an approved means of access?	No change requested; an "approved means of access" is one that complies with all applicable regulations and therefore can be approved
19	GP	5-060.3	This is critical. A connected street grid reduces congestion of automobiles by eliminating bottlenecks, while enhancing ability to walk, bike and use transit.	No change requested

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20	GP	5-060.4	This is critical.	No change requested
21	HBA	5-060.5.A.1 – Page 5-8	Receptive to what has been presented, but should amend ‘150 feet’ to ‘200 feet’ Ex., 150 feet is not enough for ½ acre lot. Is this required by fire code? Code doesn’t specifically address.	Revised as requested; 150 feet increased to 200 feet
22	GP	5-060.5 B	Cul-de-sacs should be prohibited except in very specific cases where they could be allowed by special exception. A cul-de-sac is essentially a publicly maintained private driveway. Cities across the country are discussing abandonment of cul-de-sacs due to the burden of long-term maintenance costs for these streets that serve no public benefit. They also create inefficient routes for trash and utility service providers, while disconnecting neighborhood streets from adjacent areas. This kills walkability and bikeability. A 750 ft street is twice as long as a traditional block in older neighborhoods, and longer than any cul-de-sacs allowed in our neighboring communities today. If cul-de-sacs are allowed, they should be limited to 250' to minimize the long-term maintenance costs to the taxpayers.	Permanent dead-end streets continue to be allowed under the draft regulations, but the maximum length has been decreased from 750 feet to 600 feet to address some of the stated concerns
23	GP	5-060.5 B	Why does the radius increase in conjunction with the length of a cul-de-sac street?	Table with radius requirements deleted; text now requires compliance with IFC (Int’l Fire Code)
23-1	GP	Table 5-1	Change “back of curb” to “face of curb”	Moot point; Table deleted; see 23, above
24	HBA	5-060.5.B.2 – Page 5-9	Delete language “The maximum length of a street terminated with a hammerhead turn around may not exceed 120 feet. The maximum length of a street terminated with a “Y” turn around may not exceed 60 feet.” This will prevent unique layouts and physical impediments; fire code should govern. Text reads <i>“Cul-de-sacs streets may not exceed 750 feet in length”</i> , the only limitation should be the fire code which should govern (alternative turn-around to full length). Without a waiver, you are required to design as cul-da-sac or other turnaround. Table 5-1: Minimum Cul-de-Sac Radius, equations do not allow for flexibility-issue is this should be argued on its merit. Market reality is that cul-de-sac lots are the first to sell, not connectivity.	Revised (partially) as requested; eliminated specific maximum length of hammerhead and Y-turnaround streets; also eliminated cul-de-sac radius requirements, instead defaulting to IFC However, maximum length standard has been decreased rather than increased or eliminated
25	GP	5-060.6	Is there any way to separate out the requirements for roads with bar ditches from curbed streets? Presumably curbed streets require less ROW? Eliminate residential collector as a category.	No change; regulations are based on curb and gutter designs; rural cross-sections may require greater ROW
26	GP	5-060.7	Good	No change requested
27	HBA	5-060.8 – Page 5-10	Subsection A. County still uses PUD Text <i>“Optional or”</i> development plan was deleted because private streets are not allowed in optional development plans as a result of zoning code changes. If not on Major Street and	No changes made; subsection B (20 and 40

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			Highway Plan, then delete Private Streets section, min. 50' width applicable Subsection B. Strike this subsection Subsection G. Strike this subsection DELETE Table 5-2. Limits phasing; should have 40 acres of private street and 80 acres in county. Zoning code is killing private streets (unintended consequence of zoning code). Cookie cutter planning for connectivity and grid design is not what every buyer wants.	acres) is existing
27-1	GP	5.060-8	Delete the restriction on private streets in subdivisions over 20 acres in the City or over 40 acres in the County.	See no. 27, above
28	GP	5-060.9	25' turn radius on neighborhood streets is absurd. Neighborhood streets should have turn radii of no greater than 12 feet. Small curb radii are more pedestrian friendly because they decrease crossing distances and slow vehicles at turns. What is the definition of a "major street?" Is this a primary arterial? How fast of a turn speed are we trying to achieve when a neighborhood street meets a primary arterial? Again, a 30' turn radius is absurd. Consider eliminating section C, which is redundant with the adopted engineering standards of the city/county.	Revised as requested; curb returns are covered by engineering standards and have been deleted from subdivision regulations
29	HBA	5-060-9 – Page 5-11	Subsection A. Addition of language in the subsection authorizing approval of intersection design that are within 15 degrees of a right angle is positive in following subsections since it prevents a strict interpretation of code. POSITIVE ADDITION Re: Arterials	No change requested
30	GP	5-070.1	Good	No change requested
31	GP	5-070.2	Appreciate fee-in-lieu.	No change requested
32	HBA	5-070.3 – Page 5-12	Allows for looser waivers.	No change requested
33	GP	5-070.4	Consider rewording the sentence about "providing a connection between existing sidewalks that are less than required widths..." Instead of matching the existing sidewalks, the new sidewalk should be built to current standards and tapered on both ends.	Revised as requested
34	GP	5-080	Good	No change requested
34-1	GP	5-090	Don't understand what the requirement forbidding the platting of FEMA or Tulsa Regulatory floodplains is meant to accomplish. I believe that the City should want them to be platted (as either a reserve area or an easement on a lot) and whenever possible granted to the City.	Revised; referenced provision not intended to prevent platting as "reserve" or nondevelopment parcel.
35	GP	5-120	Nice job with the entire stream buffers section, including purpose, buffer zones, allowed/prohibited uses within buffer zones, etc. This not only protects investment from flooding, it increases the value of adjacent areas through the creation of attractive greenbelts and recreational trails.	No change requested, but kudos were premature—stream buffer section has been pulled from draft
36	HBA	5-120 – Page 5-13	DELETE ENTIRE SECTION. Nothing exists that can provide accurate mapping; there are no available technologies or funds for natural resource inventory that accurately supports this section. WHO IS RESPONSIBLE FOR DEFINING STREAM? If it's been determined to be a stream, then the Corps already has authority – City input unnecessary.	Revised as requested; stream buffer section has been pulled from draft
37	HBA	5-120.3.A & B – Page 5-14	Streamside and Outer Zone = unintended consequences result in no paving in infill areas Can't build in Outer Zone, no infill.	NA; stream buffer section has been pulled from draft
38	HBA	5-130.1.A – Page 5-16	Dry line installation required inside the City limits.	No change requested
39	HBA	5-130.1.D.4 – Page 5-17	DELETE THIS SUBSECTION. Paying for something that is not platted, too premature for requirement. PERC tests are time sensitive.	Revised as requested; no "perc" test required with plan; instead prior to

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				building permit
39-1	GP	5-130.B	Strike the term “public district.” If an adjacent public district is large and the sewer line only extends 15 feet in to the public district, then this could require an adjacent developer to extend a sewer line much farther than 250 feet.	No change; Title 17 Tulsa Revised Ordinances (Section 906) controls and therefore suggested deletion would have no effect.
40	HBA	5-140 – Page 5-18	Subsection 3. Underground utility install requirement. Has this section been reviewed with PSO? Overhead electric should be allowed for distribution along in ROW or easement Cost is estimated at \$1m/mile.	PSO has noted concerns with proposed requirements for underground utility placement. The regulations have been retained in work session draft for discussion
41	GP	5-140.2	Yes. It's critical that utilities be placed underground. This not only makes Tulsa more resilient in the face of devastating storms; it makes our city more attractive and valuable because it allows us to plant canopy trees along city streets. Shady streets are more welcoming to pedestrians, cyclists and transit users, and more attractive to everyone. In a hot climate like ours, shade is essential to quality of life. Burying utilities before the neighborhood is built is simple and affordable. Providing reliable utilities in a storm can be the difference between life or death.	See No. 41, above.
42	HBA	5-150 – Page 5-18	Easements section is not requiring perimeter easements, allowing up to 17.5 feet and up to 11 feet along rear and exterior lot lines (current S/D Regs). The implementation is that unless you can get everyone to sign off on it that you don't need, you have to do it. Gas in front (not back) restores 2.5 feet. Complicates layouts with internal platting. ADD explicit language that if the property was previously platted no additional easements are required unless documented by utilities in writing.	No changes made
43	HBA	5-160 – Page 5-19	What's wrong with current process that's not in regs? It's not broken PSO is charging for street light cable now. Change text 'is authorized' to 'may be authorized'	This provision is not thought to represent as substantive change from existing practice and has not been changed in the draft
44	HBA	5-170 – Page 5-19	Delete DEVICES and replace with SIGNAGE. What is level of traffic calming? Intersection signalization is \$500k.	Eliminated offending sentence: “ Developers are responsible for installing street name signs at intersections and traffic control devices, as required by the city or county. ”
45	HBA	5-180 – Page 5-19	This is a 3 rd Party issue that does not belong in S/D Regs.	No change made; based on follow-up discussion

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				with HBA
46	HBA	5-180.3 – Page 5-20	LEAN TEAM organized by multiple mayoral administrations (LaFortune and Taylor) have evaluated this process and determined it was not needed; determination was supported by city staff. Will be tied to IDP and Surety requirement up to 110%, but no one will bond to 110%. DELETE ENTIRE SECTION 5-180 – previous administrations have not supported.	No change made; performance guarantee language remains in draft
46-1	GP	5-180	Opposed to proposed performance guarantee provisions.’ ...has been used in the past and was a dismal failure.” It is very costly in terms of both money and time to developers, engineers and regulators.	No change made; see NO. 46, above
47	HBA	5-190 – Page 5-21	DELETE ENTIRE SECTION. What is rationale?	Section is merely a “heads-up” regarding existing IDP practice; no change made
48	HBA	5-200 – Page 5-21	DELETE ENTIRE SECTION. Negatively impacting older HOAs and infill. Additional delay of months for legal approval. Will impact 1 lot/1 block commercial development before getting a permit.	No change made
49	HBA	10-030 – Page 10-4	Over 5 acres. Eliminating lot split County rule clarification. PLAT WAIVERS SHOULD BE ADDED BACK IN. Note new text in 10-030.2 and 10-030.4	See No. 60, below
50	HBA	10-040.4.G – Page 10-8	Footnote 27 – Preliminary plat extensions, increases too many determining factors.	Provision helps ensure predictability and uniformity; no change made
51	HBA	10-040.5 – Page 10-9	Cuts 2 weeks out of the process by not going to TMAPC for final plat.	No change requested
52	HBA	10.040.6 – Page 10-10	Footnote 28 or 29 – Phasing plan determined by market.	No change requested
53	HBA	10.040.6.D.3 – Page 10-11	Footnote 30 – Who proposed change?	No change requested
54	HBA	10.040.6.E.3 – Page 10-12	Infrastructure in ground or surety agreement before you can proceed with plat.	No change requested
55	HBA	10-060.1.B – Page 10-15	Creation of 5 or more lots from parent tract is not permitted (state statute)? Who owned the lot and splits; then owner transfer to avoid SD Regs? County Clerk.	No change requested
56	HBA	10-060.5 – Page 10-17 and 18	Merging of lot split and lot line adjustment procedures – will help? What if PC fails to approve (approval)-no reference in May draft, but in March draft.	No change requested
57	HBA	10-060.6.C.1 – Page 10-19	Footnote 34 – subsection retained at WR request? addition of added text ‘ <i>unless expressly approved by [INSERT OFFICIAL]</i> ’.	No change requested
58	HBA	10-080 – Page 10-22	Footnote 37 – accelerated release procedure proposed for elimination, but the issue has not been fixed for the risktakers; builder/developer or professional builder, or commercial entity building on own lot, not an individual. Different level of sophistication. March DRAFT reference to ‘deferred platting.’ Earth change permit – 30 day vs. 180 day plat process delay.	Accelerated release procedure has been recommended for deletion because under the new regulations the only plats <i>required</i> under the draft regulations are those mandated by state

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				statute. Also, there is no known precedent for subdivision regulations that allow issuance of building permits prior to completion of land division process.
59	HBA	10-080.6.C and D – Page 10-23	DELETE SUBSECTIONS C and D. There are no extenuating circumstances that require these provisions to be applicable. Acknowledge that adequate protections are in place, ex. Certificate of Occupancy Requirement should be tied to no substantial risk to the public.	Moot point; “accelerated release” has been deleted from draft
60	HBA	Page 10-25	Footnote 39 – plat waivers proposed for elimination due to elimination of zoning code requirement. DON'T TAKE AWAY THIS TOOL.	The only plats <i>required</i> under the draft regulations are those mandated by state statute. Since there is no longer a local (non-statutory) requirement for platting, there are no platting requirements that can be waived.
61	HBA	ARTICLE 15 – Page 15-1	Footnote 40 – as work on regs continues, definitions will be added, deleted and/or revised to help provide needed clarity? Use of red text – the majority of definitions have not changed since March DRAFT.	No change requested
62	HBA	DEFINITIONS – Page 15-5	Lot, Flag. Redefine or allow within the S/D Regs Plat? duplicate entries and definitions Pages 15-6 and 15-7.	Removed duplicate entries; flag lot definition and prohibition remains (see also No. 11, above)
63	HBA	PROPOSED AMENDMENT TO TULSA ZONING CODE	This requirement applies to any property for which a. a property owner-initiated zoning map	No change requested
64	HBA	General Comment	City policy? Requirements for amendments to Optional Development Plan, Corridor Site Plan, PUD, and MPD.	No change requested
65	HBA	1-080.3.E – Page 1-3	NEW SECTION/SUBSECTION. E.	No change requested
66	HBA	1-100 – Page 1-5	NEW SECTION Typo - text ‘if’, s/b ‘is’	No change requested
67	HBA	5-010 – Page 5-1	NEW SECTION Footnote reference- <i>This proposed text reflects a proposal to eliminate the mandatory “platting” requirements</i> – SEE PROPOSED AMENDMENTS TO TULSA ZONING CODE 70-080-B (END OF DRAFT).	No change requested
68	HBA	10-060.6.A – Page 10-19	NEW SUBSECTION.	No change requested
69	HBA	10-060.6.B.2.a – Page 10-19	ADDITION SINCE MARCH DRAFT.	No change requested
70	HBA	10-060.1.A.2 – Page 10-15	Footnote 32 – NEW since March 2017. Lot line adjustment procedure is intended to address situations that now require a lot split and a lot combination. Existing lot combination procedure has been eliminated. State statute requirement (never allowed to split more than 5 lots from parent). County Clerk determination-platting.	No change requested

