



# PATHWAYS TO REMOVING OBSTACLES TO HOUSING (PRO HOUSING)

CITY OF NORMAN, OKLAHOMA  
GRANT PROPOSAL





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## ATTACHMENTS

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# EXHIBIT A: EXECUTIVE SUMMARY

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## EXECUTIVE SUMMARY

Home to the University of Oklahoma (OU), newly adopted into the Southeastern Conference of College Football, Norman is a diverse, up-and-coming mid-sized city and the third largest by population and land area in Oklahoma. Anticipated to grow by more than 57,000 persons by 2045, the city shows no signs of slowing down. Residents move to, or stay in Norman for many reasons, but the most important one is that it is a great place to live. Every household: families, young professionals, students, faculty, empty-nester, needs a place to live. That means a home, a neighborhood, a community that is vibrant, supportive, and inclusive. Norman has a lot to offer top-of-the line parks and cultural recreation opportunities, diverse culture, natural beauty.

These wonderful aspects of community, however, can be overshadowed for many when making the difficult choices finding a home can represent. There is a balance of wants – size, condition, location, school districts, commute, and neighborhood services – and affordability. For many, the only option is to be cost-burdened. The median household income in Norman cannot afford a median priced home in the city today, with many of these households able to only afford 50% of the median sale price. For households that rent, there are few affordable options. As a result, many are unable to live, work, and play in Norman, and these issues disproportionately affect Norman’s most vulnerable communities. Neighborhoods with aging infrastructure struggle with distressed home conditions, deteriorating roads and sidewalks, and higher levels of cost burden. The cost of renovating or redeveloping in these areas is cost-prohibitive due to outdated regulations. New residents moving to Norman can help increase availability of resources and address some of these long-standing issues – but it can also raise prices for those who already struggle, and some neighborhoods see an influx of higher-income residents which leads to the displacement of lower-income households and communities.

Every Norman resident deserves to live in a safe, comfortable home they can afford, and neighborhood improvements should not increase displacement. Achieving this vision will call for action at all levels including the City of Norman, its partner organizations, neighboring communities, residents, and State and Federal assistance.

In an effort to further our actions addressing the limited availability of affordable housing in Norman, the City developed the Area & Infrastructure Master (AIM) Norman Comprehensive Land Use Plan and supporting Housing, Water, Wastewater, Stormwater, Park, and Transportation Plans. The idea behind this undertaking was to ensure cohesive plans, focusing not only on protecting our city’s natural resources, but also ensuring the city will be able to accommodate the influx of residents we anticipate over the next 20 years. The Land Use Plan and Housing Plan work in conjunction with one another, outlining the balance between encouraging sensitive development that is responsive to existing neighborhoods, and programming to help maintain affordability and anti-displacement. The results of these planning efforts included a robust list of possible solutions to land use and housing.

Many of the strategies identified in AIM reflect the goals of the Pathways to Reducing Obstacles to Affordable Housing (PRO Housing) Program grant. An award of \$1,000,000 would allow the City of Norman to undertake several actions to develop and implement housing policy plans, improve housing strategies, and facilitate affordable housing production and preservation.



# **EXHIBIT B: THRESHOLD REQUIREMENTS AND OTHER SUBMISSION REQUIREMENTS**

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## **THRESHOLD REQUIREMENTS AND OTHER SUBMISSION REQUIREMENTS**

### **SECTION III.D**

1. The City of Norman is not currently undergoing any resolution of civil rights matters.
2. The City of Norman is submitting this application, in full, on time in accordance with Section IV.D. Application Submission Dates and Times.
3. The City of Norman, in conformance with Section III.A. Eligible Applicants, is a 02 (City or township governments) eligible applicant and is applying as a single entity.
4. The City of Norman is submitting only one application for the PRO Housing Program Grant.

### **SECTION IV.G**

1. The City of Norman has consulted the Final Guidance to Federal Assistance Recipients Regarding Title VI, Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons published January 22, 2007 in the Federal Register (72 FR 2732) and has ensured that all information regarding the planning process and this application is available to LEP populations.
2. All meetings held in person for this application and subsequent activities will be held in facilities that are physically accessible to persons with disabilities. Where physical accessibility is not available, the City of Norman and our partners will give priority to alternative methods of product or information delivery that offers programs and activities to qualified individuals with disabilities most integrated setting appropriate in accordance with HUD's implementing regulations for section 504 of the Rehabilitation Act of 1973 (29 U.S.C.§ 794) at 24 CFR Part 8 and applicable laws and regulations. In addition, all notices and communications during all training sessions and public meetings shall be provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities or provide other means of accommodation for persons with disabilities consistent with 504 of the Rehabilitation Act of 1973 (29 U.S.C.§ 794) at 24 CFR Part 8.6.
3. The City of Norman foresees the projects outlined in this grant application to be exempt from Environmental Review.



# EXHIBIT C: NEED

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## NORMAN’S ACUTE HOUSING NEED

After 20 years under the previous Comprehensive Land Use Plan, Norman leveraged the opportunity to create a new comprehensive plan in conjunction to overhauls of some of our most prominent guiding documents, including Housing, Water, Wastewater, Stormwater, Park, and Transportation Plans known as the Area Infrastructure and Master Plan (AIM) Norman planning process. The idea behind this undertaking was to ensure cohesive plans, focusing not only on protecting our city’s natural resources, but also ensuring the city will be able to accommodate the influx of residents we anticipate over the next 20 years. This process began in late 2023 and is set to be adopted in early 2025. As part of AIM Norman, a housing market study was conducted. The primary findings of this study were astounding:

- There are few housing options for movement within the market.
- Attainable owner and renter options that match people’s incomes, needs, and preferences are increasingly difficult to obtain.
- Aging and changing population demographics are increasing demand for products not provided by the current housing stock.
- The lowest income households face more burdens than in the past, and non-white households struggle more.
- Regulations are misaligned with Norman’s housing vision.
- Many people have perceptions of the housing market that are disconnected from reality.

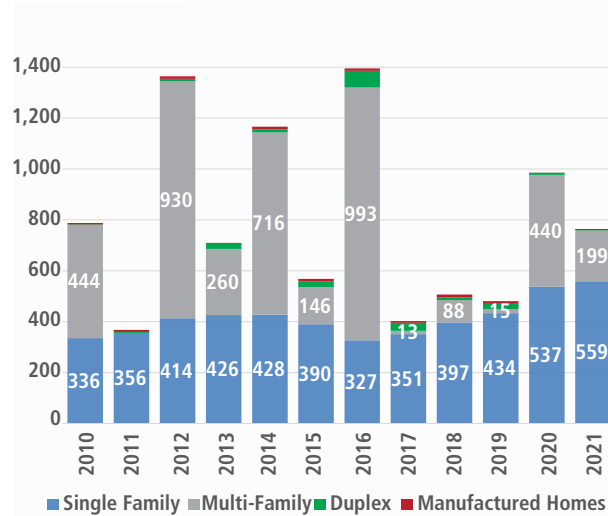
It is anticipated that Norman will continue to grow by 57,733 residents by 2045 – leading to a demand for more than 23,000 new homes and requiring an average development of 900-1,010 new homes every year to keep pace with demand. Historically, less than 800 new homes are developed every year within the city, across all price points. To meet the anticipated need for housing, Norman must find ways to increase the amount of housing stock built within the city.

AIM Norman Home Demand Forecast

	2020	2025	2030	2040	2045	Total
<b>Population at End of Period</b>	128,026	137,920	148,579	172,432	185,759	
<b>Household Population at End of Period</b>	120,227	129,519	139,529	161,929	174,443	
<b>Average People per Household</b>	2.36	2.36	2.36	2.36	2.36	
<b>Household Demand at End of Period</b>	50,944	54,881	59,122	68,614	73,917	
<b>Projected Vacancy Rate</b>	7.4%	8.0%	9.0%	7.5%	7.0%	
<b>Home Needs at End of Period</b>	55,015	59,653	64,970	74,177	79,480	
<b>Replacement Need (total lost homes)</b>		60	100	200	100	460
<b>Average Annual Construction</b>		999	1,083	941	1,081	1,010
<b>Cumulative Need During Period</b>		2,998	5,417	9,408	5,403	23,226

Source: RDG Planning & Design



## Norman Residential Building Permits, 2010-2021



AIM Norman identified a severe need for affordable housing options. Referred to as being “cost-burdened” a household spending over 30% of their total household income can find it difficult, or burdensome, to meet other daily needs. In Norman’s household profile, 75% of very-low-income households are cost-burdened, and 60% of households making less than \$50,000 a year are cost-burdened. For renter households, 44% are burdened by the cost of housing. Additionally, over 200 Low-Income Housing Tax Credit housing units within the city will reach the end of their 30-year compliance term in 2025, risking rising rental rates. Of households that are cost-burdened, black households are most severely impacted. Clearly, Norman’s housing stock lacks options for the most vulnerable of households, creating a disproportionate impact on those who are least able to shoulder that burden.

To afford a median, single-family home in Norman, a household must spend \$298,402 (Zillow, 2024), while the maximum price that a median family can afford is \$117,000. A decade ago, this was not the case: in 2010, home values were 60% lower. While the median sale price is just below three-hundred thousand dollars, the median home value for 2022 was \$192,700, meaning that homes are selling for much more than they are valued at – an implication that the tight market is only accessible to those able to pay more to enter.

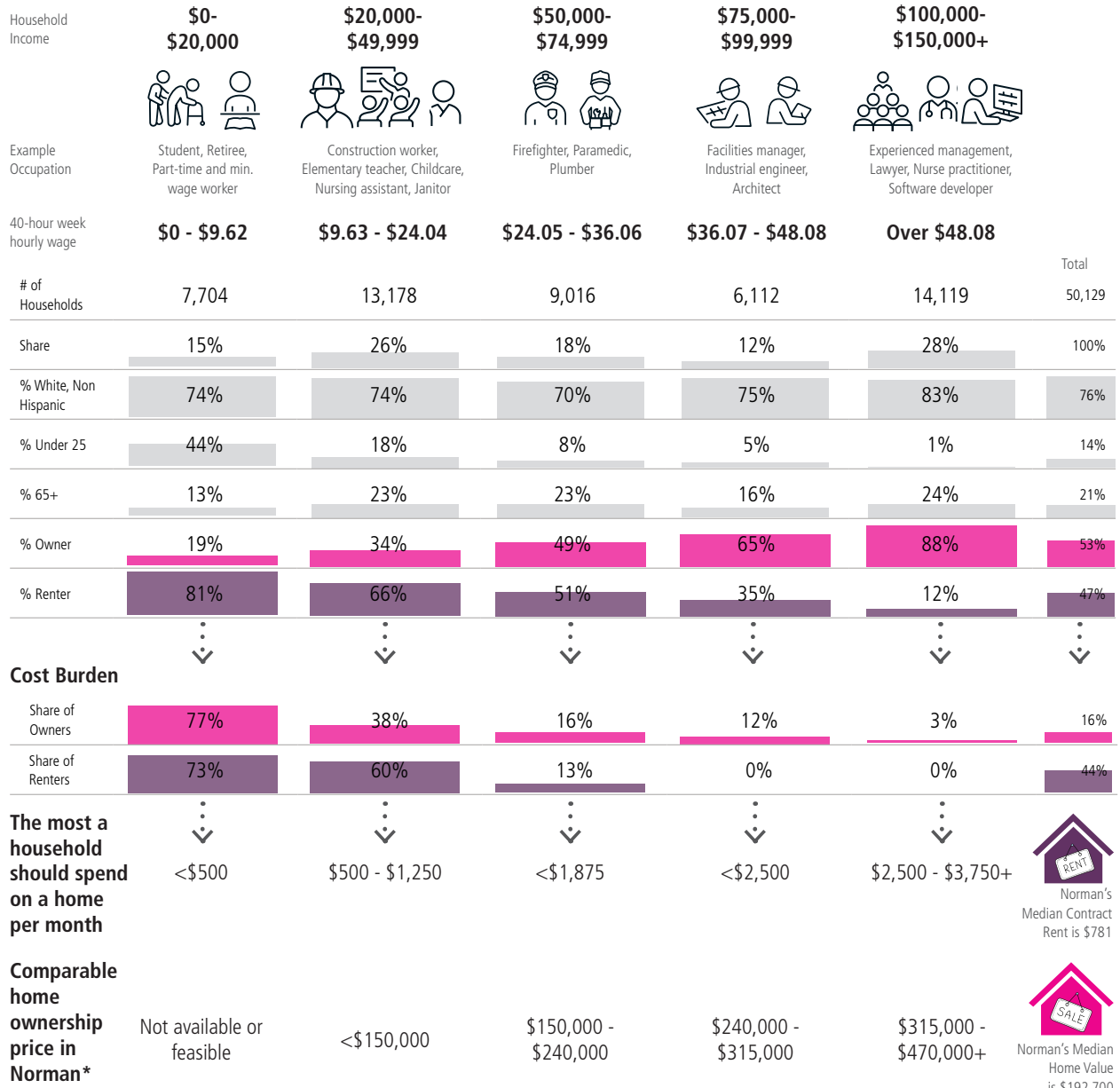
### Changes in Cost of Homes and Rent in Norman and the Surrounding Area

	2010	2021		2010	2020	
	\$143,200	\$192,700		\$568	\$781	Norman
	\$131,800	\$175,700		\$581	\$823	Cleveland County
	\$104,300	\$192,700		\$473	\$679	Oklahoma

Source: American Community Survey

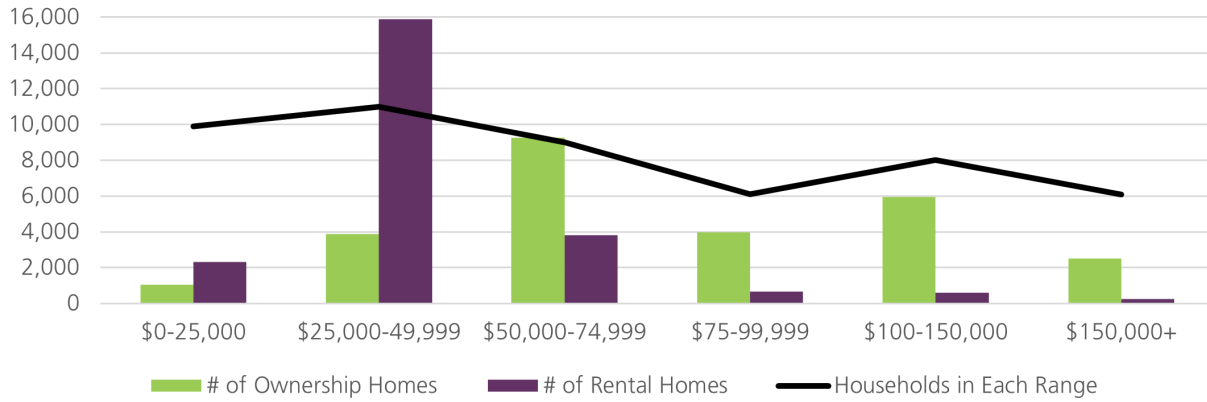
Reported median rent within Norman increased by over 48% from 2010-2022 and 13% from 2020-2022. The city also has a yearly influx of nearly 32,000 students and, while some student housing products are available at affordable prices, these students create additional demand in the rental market. This places an extreme burden on low- and middle- income households across the city trying to find safe, comfortable, affordable housing.

## Norman Household Profile



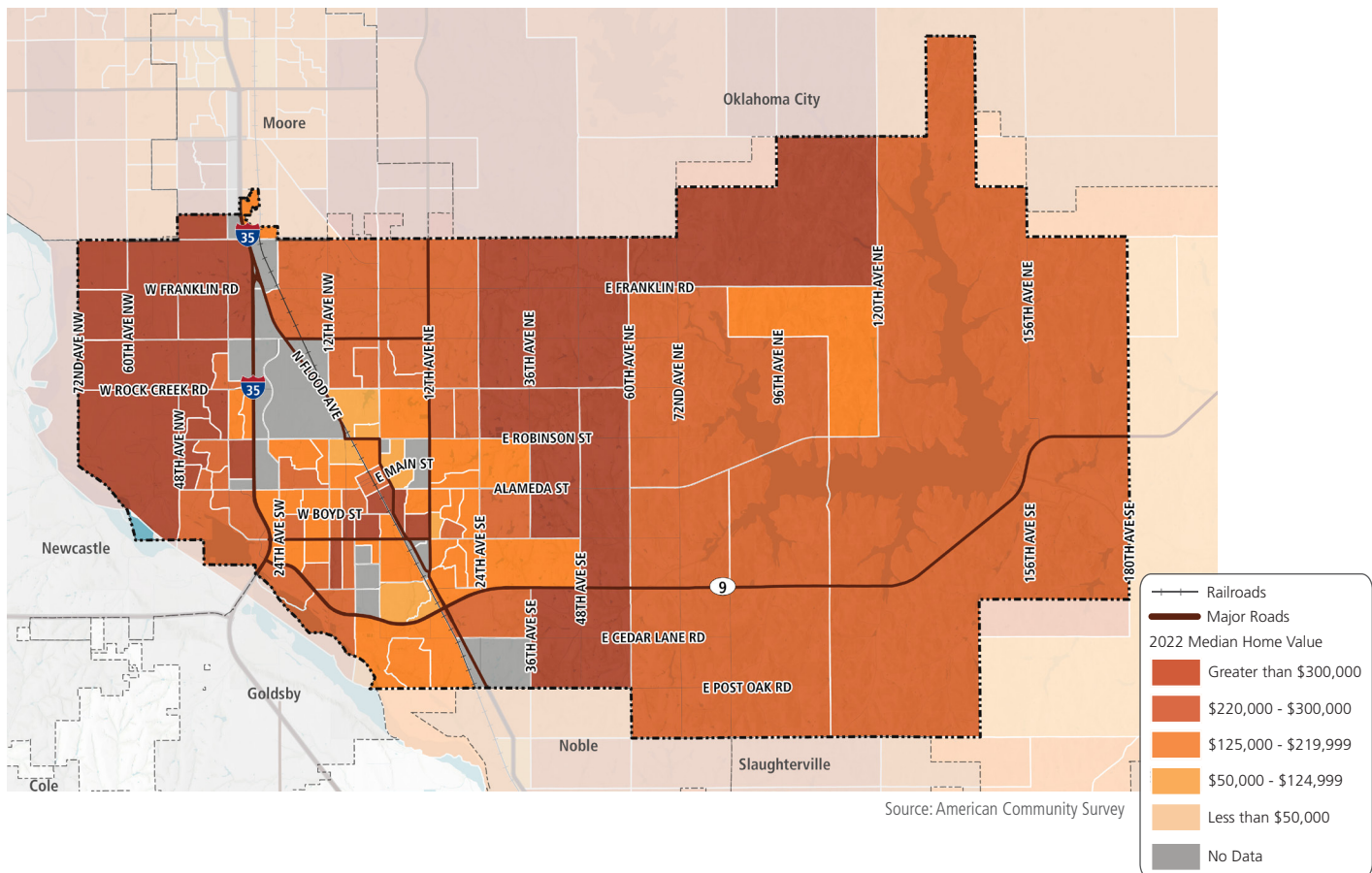
Source: American Community Survey; Paycheck to Paycheck for the Oklahoma City Metro; Zillow.com  
 \*Assumes a good credit score, no downpayment, no HOA fees, comparable local taxes/insurance, and a 30-year fixed rate mortgage at 6.2%. The comparable home price rises considerably with a 20% downpayment

### Norman Housing Stock, by Tenure



As noted, the median income family in Norman cannot afford the median priced home. However, the scale of affordability for homes differs by location within the City, and some areas are more affordable than others. Two-thirds of Norman’s housing stock was developed prior to 2000, with many homes near the city’s core having been developed prior to the 1960’s. While some of these homes are highly controlled historic homes, this area of the city is also home to much of the City’s naturally occurring affordable housing (NOAH) stock. The homes in these areas are already seeing higher levels of displacement, due to development pressure.

### Norman Median Home Value, by Census Tract



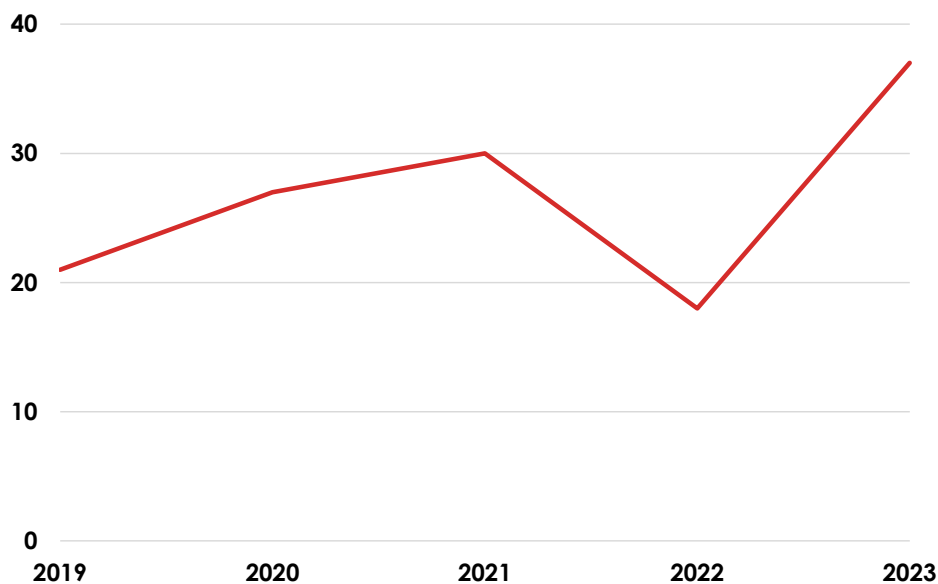
## REASONS FOR THE AFFORDABILITY CRISIS IN NORMAN

Like many Cities in Oklahoma, a lack of clear, consistent development requirements results in the inconsistent application of regulations and “negotiations at the horseshoe,” where City Council can make additional demands or acquiescence of developers up until the last moment, endangering projects and making the development process not only arduous, but also infeasible in some instances.

One of the most substantial regulatory barriers leading to affordable housing production and preservation in Norman is the lack of supportive Zoning Code and Subdivision Regulations. Stakeholders of the AIM Norman process indicated low housing supply and development regulations are barriers to overcome. Adopted in 1954, Norman’s first and current regulations do one type of development very well – greenfield large-lot housing subdivisions, to the detriment of all other forms of housing development, including multi-family and missing middle housing types. The Code includes no flexibility or provisions geared towards existing, non-conforming buildings, infill development, and lacks robust administrative approval processes.

Of land zoned for residential uses within the developed area of Norman, over 80% is single-family, with multi-family housing types requiring additional regulatory hurdles before approval. The existing regulations require an increasing number of variances and requests for Planned Unit Development (PUD) rezoning requests. These requests may take upwards of 90 days to complete and require a minimum of two public hearings placing heavy burdens on smaller developers and households looking to reconstruct. In the past five years alone, Norman has seen a 76% percent increase in the number of rezoning requests with 65% of those requests being for a PUD, many of which contain residential uses.

Zoning Change Applications, 5-Year Trend



Additionally, while parking requirements have been updated to recommendations for many types of development, they remain requirements for single-family housing. State statute only requires 33 feet of right-of-way on either side of the road centerline, so many early neighborhoods were established with minimal room for on-street parking. Further, Oklahoma’s reliance on auto-

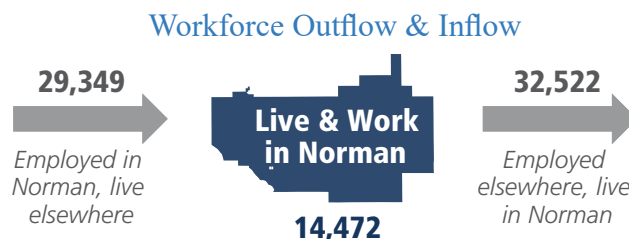
centric infrastructure has created issues where building housing without sufficient parking leads to crowding on public streets, impacting emergency response times and circulation.

Prohibitive building codes also impact the ability for Norman to supply additional housing units. State Code requires any building with four or more units to be considered under the commercial building and fire codes. These requirements can sometimes double the estimated cost of a project, leaving them infeasible for many developers unless the project is of a large enough scale. This leads to a lack of interest in building the missing middle housing that Norman so desperately needs. There is some interest from Norman and neighboring cities to work with the State to make changes to these regulations, specifically for projects where buildings contain six or less homes.

Simplifying processes – allowing more housing types by-right, adding administrative processes, coordinating departmental review, and offering mixed-use, redevelopment, and mixed-income incentives are some of the key items Norman would like to integrate into existing regulations on top of addressing the other, major issues regarding inconsistent application.

Additionally, barriers to affordable housing include infrastructure constraints within the city, specifically in the oldest parts of developed Norman. Near the core of the city, where NOAH is most common, increasingly strained infrastructure will have to be replaced to handle the increase of not just additional persons, but the impervious surface coverage that often comes with increased densities. It is essential that the replacement, as well as expansions, be done with care and sensitivity to residents and our environment.

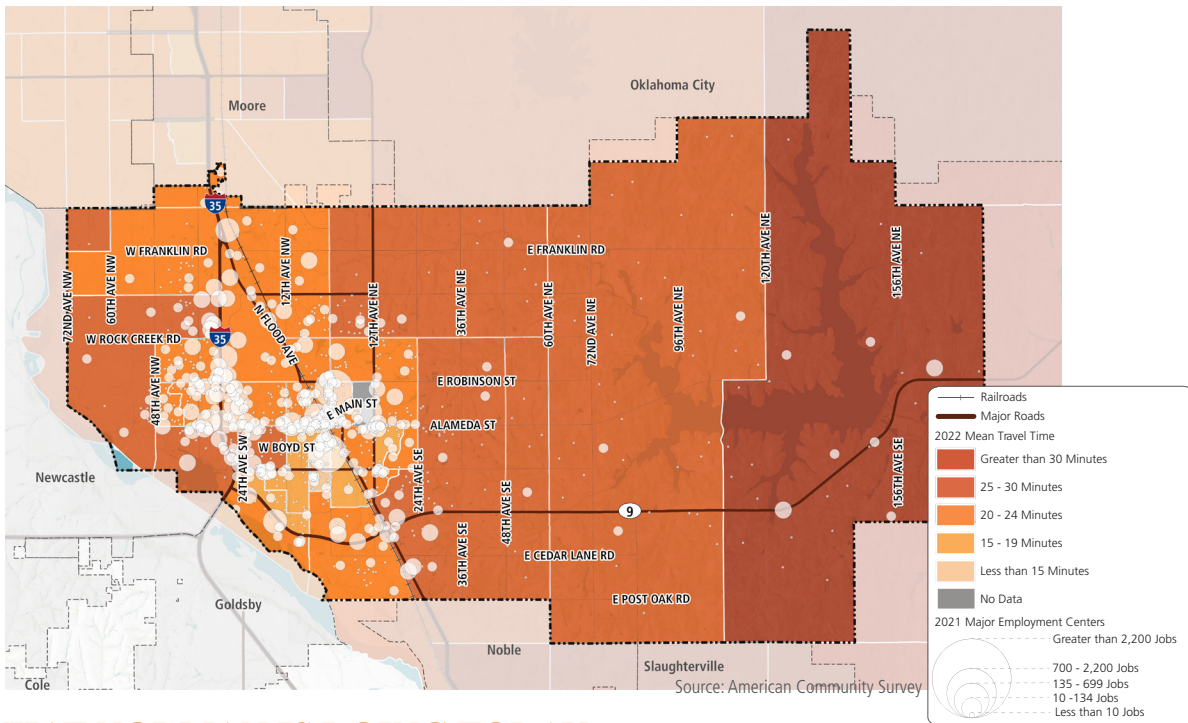
In addition to regulatory and infrastructure hurdles, there are simply not enough jobs in Norman that support living within the City. While it's common for cities in the Oklahoma City Metro Area to have commuters work with the state's capitol city, only 22% of the City's workforce lives and works within the city. The AIM Norman Comprehensive Land Use Plan has identified multiple areas for mixed-use and job center locations with the hopes of attracting new businesses to Norman to support our growing population. In order to support the areas identified, it will be necessary to establish a flexible Zoning Code that also encourages the types of development we wish to see.



Source: Census OnTheMap, 2021

Lastly, once homes are produced at the correct level, residents within the City of Norman may require assistance or support owning, renting, and maintaining their homes. Often, even when a household is not cost-burdened, they may be unable to withstand the cost of other daily needs. Only 44% of Americans would be able to pay for an emergency expense of \$1,000 or more from savings. It is imperative that Norman establish programming to support households of all types, income levels, and abilities – beyond what is being offered today.

## Employment Centers in Norman, By Census Tract



### WHAT NORMAN IS DOING TODAY

The City of Norman currently provides a range of tools to support housing development and preservation including financing, rehabilitation, code enforcement, and zoning reformations. Increasingly, efforts have been made to expand housing options for members of our community by:

	TOOL	IMPACT
SUPPORTIVE PROGRAMMING	<b>Housing Rehabilitation</b>	City of Norman provides the majority their federal HUD programming dollars to the development of housing, infrastructure for housing, and housing rehabilitation. Rehabilitation projects provide up to \$25,000 per eligible household to cover improvements beyond basic systems and structural needs for low-income households.
	<b>Accessibility Modification</b>	These projects may be either owner-occupied or rental properties. Typical projects include ramps, widening of doorways, and installation or grab bars and hand rails. Also available is a program for Non-Profit Agencies needing accessibility modifications.
	<b>Emergency Repair</b>	The Emergency Repair Grant Program is designed to address an area of urgent need which directly affects the immediate health, safety, or sanitation of the occupants of the structure. Typical projects are replacement of the roof, HVAC system, water heater, sewer line, etc.
	<b>Down-Payment Assistance</b>	The CDBG Grant Division offers \$14,999 in mortgage assistance to first time income eligible home buyers. The City recently approved this program in 2023.
	<b>HOME Funds</b>	HOME and CDBG funds can be paired with federal housing tax credits to provide gap financing for affordable housing developments.

PLANNING EFFORTS

**AIM Norman Comprehensive Land Use Plan** After 20 years under the NORMAN 2025 Comprehensive Land Use Plan, Norman leveraged the opportunity to create a new comprehensive plan in conjunction to overhauls of some of our most prominent guiding documents. The idea behind this undertaking was to ensure cohesive plans, focusing not only on protecting our city’s natural resources, but also ensuring the city will be able to accommodate the influx of residents we anticipate over the next 20 years. The Land Use Plan outlines the balance between sensitive development that is responsive to existing neighborhoods and encourages denser development to further affordable housing goals.

**AIM Norman Housing Plan** The Housing Plan portion of the AIM Norman planning efforts included a housing market study for benchmark indicators, an involved public process in establishing Norman’s housing goals for 2045, and outlines key efforts the city must pursue to meet our housing needs:

- The City must modernize development regulations.
- Variety of housing types across more densities and design approaches.
- Attainable, affordable options for all people must be made available.
- Existing neighborhoods should benefit from infill, enhancements, and maintenance.
- Clear, understandable, and reasonable housing incentives and program procedures should be established.

REGULATORY CHANGES

**ADU Regulations** Accessory dwelling units (ADUs), which are additional homes on residential lots. Traditionally, these homes have been known as “granny flats,” “mother-in-law suites,” or “garage apartments.” In 2024, Norman approved ADUs by-right in almost all residential zoning districts, several of which had parking requirements. After reviewing the types of applications coming into the office, and issues people were having, in May of 2024, these sections were updated to allow ADUs of various types within all residential zoning districts, and parking requirements were removed.

**Tiny Home Provisions** Special Tiny Home provisions were introduced, allowing mobile tiny homes to be approved as special uses in rural areas of the city, where access to services are minimal, and multi-generational living is more popular.

**Parking Requirement Reform** In 2022, the City made a bold move. Shifting from parking “requirements” to “recommendations,” except for single- and two-family dwellings, which has allowed larger residential projects to limit parking and focus more on increasing density. Over the past few years, Norman has seen multiple large residential projects developed and has not seen any negative impacts related to parking on these.



**Home Occupation Expansion**

In 2024, Norman relaxed home occupation regulations. These improved regulations allowed additional types of businesses to be conducted as home occupations and expanded home occupations to all residential zoning districts. Additionally, language was improved to allow home occupations within ADUs, which were previously expressly prohibited through language like “primary dwelling,” “main dwelling,” as well as improving language allowing residents, rather than property owners to conduct home occupations. These allowances create more opportunity for Normanites to engage in home occupations and reduce the need for additional space rentals.

**Center City Form-Based Code**

In 2017, Norman adopted the Center City Form-Based Code (CCFBC). Most parcels governed by the regulating map were established early in the City’s history. Its purpose is to provide a mechanism for implementing the following specific goals, using both public and private sector investments:

1. Capitalize on public investment in existing infrastructure.
2. Stabilize and strengthen mixed-use commercial centers and residential neighborhoods.
3. Create a pedestrian-oriented and multi-modal district.
4. Promote, create, and expand housing options.
5. Ensure transit-supportive and transit-serviceable development
6. Ensure a complementary relationship with surrounding neighborhoods.

In the years following the adoption of the CCFBC the area has seen increases in higher density developments.

**Mixed-Use Zoning**

A mixed-use zoning district was established as an option for developers looking to rezone. Unfortunately, almost all rezones related to this zoning also require a land use change. With the upcoming adoption of the AIM Norman Land Use Plan, this will no longer be the case – a testament to Norman’s ever improving processes and commitment to affordable housing goals.

**Lot Requirements**

The City allowed lots platted prior to the adoption of the Zoning Code and Subdivision Regulations to be developed for limited residential purposes without going through Board of Adjustment or variance procedures. This allows smaller, older lots to be demolished and rebuilt, even if they do not conform to current minimum lot size requirements.



# EXHIBIT D: SOUNDNESS OF APPROACH

PATHWAYS TO REMOVING OBSTACLES  
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## SOUNDNESS OF APPROACH

The City of Norman proposes four projects to directly address increasing the amount of affordable housing development and preservation within the city and reduce barriers to housing. Among the Norman households who pay too much for housing, some are far less likely than others to require assistance.

As such, the AIM Norman Housing Plan notes that the City cannot do this work alone. Further, housing affordability must be strategically developed through goals that are responsive to the needs of specific issues and communities in Norman, especially for our most vulnerable residents. The goals of the AIM Norman Housing Plan are outlined below:

- Goal 1:** Modernize development regulations to achieve consistency, efficiency, and outcomes.
- Goal 2:** Add variety in housing types across more densities and design approaches.
- Goal 3:** Increase attainable, affordable and quality housing options for all people.
- Goal 4:** Maintain, enhance, and infill gaps in existing neighborhoods.
- Goal 5:** Have clear, understandable, and reasonable housing incentives and program procedures.

### PRO Housing Project 1: Update the City of Norman Zoning Code and Subdivision Regulations

The City of Norman's current Zoning Code is also its original one. Adopted in 1954, Norman's regulations have received updates throughout the years, but are riddled with inflexibility, contradictions, and no allowances for the types of affordable development that the City is looking to encourage. The Code also includes no provisions geared towards existing, non-conforming buildings, infill development, and lacks robust administrative approval processes. The related Subdivision Regulations, while more recently adopted, are based on the type of development that the Zoning Code was designed for – greenfield development of large-lot, single-family homes. In fact, while most lots platted prior to the adoption of the Zoning Code are 25-feet wide, the Subdivision Regulations require a minimum of 35-feet of street frontage and 50-foot lot width to develop a home on a lot.

Further, the City of Norman would like to plan for the establishment of commuter rail throughout the Oklahoma City Metro area, as outlined by the Regional Transit Authority (RTA). It is anticipated that multiple commuter rail stations will be fully active within Norman in the next five to ten years. As such, the AIM Norman Comprehensive Land Use Plan has established Transit-Oriented Development (TOD) Land Use Designated areas which will require specific Zoning regulations to cater to the unique needs of these areas.

The City of Norman believes that an overhaul of the current Zoning Code and Subdivision Regulations, possibly for the creation of a Unified Development Ordinance (UDO), would lead to consistent, reliable regulations that positively benefit housing production for years to come.

The AIM Norman Housing Plan outlines several key improvements that could benefit housing

production and preservation within Norman. These, as well as additional items the City believes are integral to the production and preservation of affordable housing, include the following changes foreseen within the overhauled regulations:


- Minimum density standards, specifically in TOD and Job Center Land Use Designations.
- New Zoning Districts that broaden by-right residential uses.
- Development standards for additional housing types.
- Clarified standards for home development on infill lots.
- Flexibility for non-conformities in existing neighborhoods.
- Improved ADU and Tiny Home provisions.
- Live-work by-right in all residential Zoning Districts.
- Floor-area ratio requirements and evaluation of all bulk standards.
- Context sensitive landscape requirements.
- Parking Regulation Improvements.
- Setback flexibility to allow for:
  - Replication of successful setback requirements in older neighborhoods throughout the city,
  - Home design variation,
  - Improved drainage, common open space, and trails,
  - Fewer Board of Adjustment requests just for setback adjustments, and
  - Opportunities for developers to design homes at lower price points.
- Administrative approvals for items that advance the goals of the Housing Strategy Plan.
- Offerings for mixed-use and redevelopment incentives, including density bonuses and/or inclusionary zoning.
- Incentives for low-income and workforce affordable housing.
- Provisions for mixed-income or price point projects, including target metrics.

Precedent: Edmond, OK; Oklahoma City, OK


Estimated Cost: \$500,000

Housing Goals (pg. 19) Impacted:

Estimated Timeline: 18-21 Months

Goal 1 

Goal 2 

Goal 3 

Goal 4 

Goal 5 

### **PRO Housing Project 2: Develop and Adopt a Neighborhood Pattern Book of Pre-Approved Housing Designs**

One strategy clearly called for within the AIM Norman Housing Plan is for the creation of a housing typology pattern book including pre-approved plan configurations specifically designed for missing middle housing types and smaller lots. The main goal of this item is to encourage the development of products with affordability guarantees for households making 80%-120% AMI.

A housing pattern book of architectural plans, pre-approved by the City’s Development Services Division, for infill housing in Norman neighborhoods, including single-family homes, duplexes, missing middle (2-12 homes) housing, and ADUs. The Pattern Book project includes the development of housing plans prepared by consulting architects, planners, engineers, as well as building code analysts (some staff, some consultants obtained through a competitive RFQ process). The City of Norman would purchase the intellectual property of the pattern book so that Norman residents can use the plans at low to zero cost and receive expedited approvals through





Development Services if the plans are used.

Depending on the applicable Zoning District, paired with decreased minimum lot sizes and flexible standards (from Project 1) these plans could be used for homeowners to redevelop, add density to existing homes, or fully develop vacant lots. Plans would also be available to our local housing partners, for-profit and non-profit housing developers, for infill housing projects including those with affordability guarantees.

The Neighborhood Pattern Book would have a neighborhood component, consistent with the policies of character areas, as outlined in the AIM Norman Comprehensive Land Use Plan, to be suitable for existing Norman neighborhoods and garner support. The pattern book would live in the Development Services Division and be marketed to homeowners and small developers, like the *Sears, Roebuck & Co.* Catalogue of plans that used to speckle the lots next to Norman’s beloved Burlington North Santa Fe (BNSF) rail line.

Precedent: Bryan, TX; Shawnee, OK Estimated Cost: \$200,000

Housing Goals (pg. 19) Impacted: Estimated Timeline: 12 Months

Goal 1                      Goal 2                       Goal 3                       Goal 4                       Goal 5 

### **PRO Housing Project 3: Conduct a Parking Study to Determine the Impact of Minimum-Maximum Regulations on Housing Affordability**



The City of Norman’s minimum parking recommendations and requirements are often cited as inhibiting the construction of new housing. Required parking is outlined for single-family, duplex, and Center City Form-Based residential development. In 2022, the City updated requirements for all other uses, including multi-family construction to recommendations. While this was a step in the right direction, the City is considering the implications of enacting maximum parking requirements as well.

Large commercial projects often over park – using numbers based specifically on outdated assumptions of peak traffic on holidays and during their busiest hours. This creates a sea of parking that is unused most of the time. The land saved from instilling maximum parking could, incrementally, be used to develop mixed-use housing as well as lower the cost of construction. Additionally, the establishment of less car-dependent development would produce more affordable housing patterns, especially in TOD and Urban Living Center Land Use Designated areas of Norman.

Changes to parking standards can be adopted under the existing Comprehensive Plan and Zoning Code, but will require a comprehensive study to determine the extent to which these should be updated. As such, this project would include a comprehensive evaluation of parking supply and demand near OU campus, downtown, and for typical use categories. Following the study, staff will work with the Project 1 Consultant (to be contracted via competitive RFQ) to implement recommendations from the study into the Zoning Code and Subdivision Regulation update.

Precedent: Iowa City, IA Estimated Cost: \$100,000

Housing Goals (pg. 19) Impacted: Estimated Timeline: 6 Months

Goal 1                       Goal 2                      Goal 3                      Goal 4                      Goal 5 

## PRO Housing Project 4: Produce an Affordable Housing Action Plan

The Housing Plan as outlined in AIM Norman, was the City of Norman’s first ever inclusion of a housing element in the Comprehensive Plan. While the plan outlines some of the essential overarching goals that the City should pursue, as well as clearly define Zoning Code and Subdivision Regulation improvements, there is a lack of specific, prioritized programming outlined within the plan.

As such, following the adoption of the new Zoning Code and Subdivision Regulations, the City of Norman believes that to preserve affordable housing and limit displacement, an affordable housing action plan should be developed concurrently to the production of the Neighborhood Pattern Book. Both products will incorporate the updated regulations to ensure that the City is on the right path to meet affordable housing goals. Further, the affordable housing action plan will allow Norman to use the AIM Norman Housing Plan as a baseline for which to compare progress and provide an opportunity to update key metrics for maintenance and monitoring.

This Affordable Housing Action (AHA) Plan shall explore:


- Defining “affordability” within Norman and determining parameters for affordability requirements for city-backed projects.
- Clearly promoting affordable housing, especially in TOD and Urban Living Center Land Use Designations.
- Creating a pathway for establishing anti-displacement housing regulations, which may include Right-of-return and Right-of-first-refusal Ordinances.
- Providing a road map for supportive programming, and strengthening financing, education, and partnership options for the City including:
  - Development or redevelopment of affordable housing via City-backed projects.
  - Identification of affordable housing stock requiring maintenance and repair.
  - Expansion of the existing Low-Income Housing Tax Credit (LIHTC) program, as well as possible funding sources for future projects, exploration of fee waivers, and related parameters for establishing such programming.
  - Identification of partnership opportunities.
- Detailing the action steps, timelines, responsible parties, and required resources for short- and long-term actions and strategies as defined in the AHA Plan.

Precedent: Edmond, OK; Oklahoma City, OK


Estimated Cost: \$200,000

Housing Goals (pg. 19) Impacted:

Estimated Timeline: 10-12 Months

Goal 1 

Goal 2 

Goal 3 

Goal 4 

Goal 5 

## ALIGNMENT WITH EXISTING INITIATIVES AND SIMILAR EFFORTS

### Zoning Reforms

Many cities have looked towards zoning reformation to establish more equitable, affordable housing patterns. Most prominently, cities have begun to allow multiple housing types within zones by-right, shifting from exclusionary zoning practices to more inclusive ones. Edmond, OK is currently going through a zoning update right now where there are two or three housing zones, excluding their new mixed use zones – low, medium, and high residential. In each zone, there

are multiple housing typologies which are allowed, as well as the integration of ADUs, live/work development, and appropriately scaled commercial and recreational development. California has been leading the housing reform pattern for a long time – adopting ADU standards, reducing parking requirements, and promoting linkage fees, affordable housing projects, and mixed-income projects. In addition, the ONE Atlanta housing plan covers everything from zoning reform to affordable actions such as turnkey renovations for affordable housing stock, community land trusts, and revolving affordable housing funds. This project has been going for several years with successful catalyst projects.

In Oklahoma City, the Strong Neighborhoods Initiative (SNI) works with community partners to build affordable housing projects, such as the PIVOT revitalization of NE 23rd Street. PIVOT, a neighborhood non-profit also recently constructed a tiny home affordability project within Oklahoma City.

### **Existing Initiatives**

The items outlined in this application are the direct result of ongoing policy changes led by the municipality, elected officials, and community sentiment. During the AIM Norman (AIM) process, which included updates to the Comprehensive Land Use Plan and the Housing Plan element, the AIM Norman steering committee was adamant that until zoning and subdivision regulations reflected the goals and efforts of the new plans, we would not be able to produce more affordable housing types within the City. This committee included community members from various stakeholder groups, including developers, the local continuum of care, nonprofits, and REALTOR®s.

The AIM Norman planning efforts account for population growth into 2045 and require a nearly 50% increase in yearly housing development to accommodate the anticipated population change within that time. The Housing element of AIM includes a list of strategies to pursue, including sourcing stronger partnerships, developing housing funds, and expanding programming. An affordable housing action plan would allow the city detail and understanding of the goals and efforts outlined in this element.

The proposed changes to the Zoning Code, neighborhood pattern book, study of parking, and affordable housing action plan will allow the city to prepare confidently for the introduction of regional commuter train routes and expansion of existing regional public transit – as outlined in RTA and Embark regional plans.

With focus on infill and redevelopment, as well as rehabilitation and renovation, the proposed activities under this grant application endeavor to include anti-displacement regulations and long-term housing equity. Tools and processes outlined in the AIM Norman Plans focus not just on increasing affordable housing stock, but also maintaining affordability for existing residents. The increased flexibility of the code and foreseen action plan towards supportive programming endeavor to help keep residents in their homes – with those homes being safe, comfortable, and attainable for households of all shapes and sizes.

The activities proposed within this application are forward-looking, keeping in mind the job centers of the area. The University of Oklahoma (OU) located within the City of Norman, and Oklahoma City are some of the largest employment centers in the area. Updated Zoning Code and Subdivision Regulations, supported by an understanding of the impact of parking patterns; paired with neighborhood level Pre-Approved plans and an Affordable Housing Action Plan will allow the city to focus on affordable housing near public transit and commuter rail – establishing strong

last-mile connections and allowing residents, employees, and visitors safe connectivity between home and work.

### **Environmental Considerations**

The most significant environmental risk facing the City of Norman is the impact of development and human activity on the local watersheds, including Lake Thunderbird and the Garber-Wellington Aquifer. Without substantially protective regulations in place, poor drainage and sprawl development will impact the water supply very quickly. In 2023, the City of Norman suffered from a drought, which impacted the daily water use of residents and visitors. Building in a sustainably resilient manner is at the forefront of the AIM Norman processes, which included an update to the Water, Stormwater, and Wastewater Master Plans. The resulting plans intend to increase density within the most developed areas of the city, while protecting the ecologically sensitive areas surrounding the watersheds and the floodplains. With higher density projects, drainage can be handled at the neighborhood level, as opposed to site-by-site basis, which increases the likelihood that the impact will be mitigated and promotes low impact design. Additionally, reusing existing parking spaces for redevelopment encourages redevelopment to include less impervious coverage, reducing the impact of run off and preventing flooding issues within the City.

### **Possible Roadblocks**

Roadblocks that may impede the implementation of the proposal, including most likely obstacles are changes in City Council members and possible community opposition to the development in affordable housing.

City Council has expressed strong interest in affordable housing and has supported staff-led efforts including the AIM Norman Comprehensive Plan process and AIM Norman Housing Study. However, changes in leadership may impact the ability to codify reforms. Staff believes open and clear communication about the benefits of these changes to constituent lives, along with transparency, fiscal responsibility, and public stewardship will enable these processes to be implemented. As a municipality, City staff is not new to the impact of leadership change, but is cognizant of the obstacle it may propose.

Additionally, while support for affordable and attainable housing has been growing within Norman, there can still be opposition to projects of certain sizes and scales. Staff is confident that working with City Council and City Management will allow for robust public processes that create strategies and implementation towards affordable housing for all people within the City.

### **GEOGRAPHIC SCOPE OF PROPOSED GRANT-FUNDED ACTIVITIES**

The activities proposed within this application are intended to serve the entire geographic scope of the City of Norman. Key portions of the Plan, Neighborhood Pattern Book, and Zoning and Subdivision regulation updates will prioritize historically under-served areas, TOD and Urban Living Center Land Use Designations, and ecologically sensitive areas with specific details.

A map of Norman City Limits is provided on the next page (pg. 25).





## STAKEHOLDERS

Norman has tremendous support from our community stakeholders for building affordable housing in the City. All activities outlined within this application were developed because of the two-year long planning process for the AIM Norman Comprehensive Land Use Plan and related elements for various portions of the city, including Housing. The AIM Norman process included a 14-person steering committee of community members from various backgrounds and representatives of partner organizations, including the local continuum of care (CoC) and non-profit organizations. A sub-committee was convened for the purpose of deep diving into the Housing Need within Norman. This committee met several times and with local groups. Public outreach for this plan also included in-person and virtual input opportunities of multiple kinds – including surveys, mapping exercises, open comments, e-mails, sticky notes, and public comments. Throughout the process, over 17,000 visits to the project website occurred and over 2,300 survey responses were received, with the housing topic receiving more survey responses than any other subject. The resulting direction from these processes was ubiquitously in support of updating the Zoning Code to allow more housing types by-right and additional changes and protections that would help further the goals of creating affordable and attainable housing within the city.

Some of the feedback the City of Norman heard during the AIM Norman Planning Process includes:

*“[Norman] needs more quality, affordable housing for low and middle-income [households]...” – Neighborhood Workshop Participant*

*“Please build a more walkable community that is affordable.” – Survey Respondent*

&

*45% of survey respondents recognized “Increasing attainable, accessible, and quality housing options for all people” as the top of five goals within the proposed housing plan.*

An outline of stakeholders identified for each proposed grant-funded project is shown below.

PROJECT	STAKEHOLDERS
<b>PRO Housing Project 1:</b> Update the City of Norman Zoning Code and Subdivision Regulations	City Staff, Developers, Builders, Financiers, Architects, Engineers, and other development professionals who will ultimately be Code users.
<b>PRO Housing Project 2:</b> Develop and Adopt a Neighborhood Pattern Book of Pre-Approved Housing Designs	City Staff, Small Developers, Property Owners, For- and Non-Profit Partners
<b>PRO Housing Project 3:</b> Conduct a Parking Study to Determine the Impact of Minimum-Maximum Regulations on Housing Affordability	City Staff - Historically speaking, parking studies do not have public engagement components. The results of the study, and regulatory impacts it may have, will go through the stakeholders involved in the Zoning Code update.
<b>PRO Housing Project 4:</b> Produce an Affordable Housing Action Plan	City Staff, Low- to Moderate- Income Households, Non-Profit Partners, CoC Partners, Elected Officials, and Residents in need of resources.

During the planning process for the Zoning Code, stakeholders involved in the planning process will include those most familiar with the code, who will be working with them – local developers, elected officials, committee members, lenders, designers, builders, and engineers. Their expertise will allow the City to craft a Code that ensures ease of use and proper processes. While public engagement for this process will be limited, the directions were crafted from years of public input on multiple projects.

The affordable housing action plan will center these stakeholder groups throughout the process. AIM Norman’s housing plan was developed with community stakeholders, but we acknowledge that there were people missing from the conversation. As part of this plan, we look to complete focused stakeholder engagement with these groups, as well as groups within our CDBG Neighborhoods program. By conducting focus meetings across multiple day and time periods, we can cater to the specific needs of each group. Additionally, we plan to do focused outreach at locations such as the senior center, public libraries, food banks, and on public transportation to increase the probability that we are clearly representing all groups.

## **AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH)**


### **“Building an Inclusive Community.” – Norman City Motto**

The City of Norman is intent on doing more than simply not discriminating in compliance with the Fair Housing Act mandate. Meaningful actions will be undertaken to overcome patterns of segregation, concentration of socioeconomic status, and fostering inclusive communities. Beyond the statutorily protected classes (Race, Color, National Origin, Religion, Sex, Familial Status, Disability), the City further makes concerted efforts to develop housing that includes mixed-income and all income levels. These efforts are not limited to a specific Council Ward or geographic area.

It is anticipated that the proposed project activities will result in the removal of barriers to the development of affordable housing in well-resourced areas of opportunity by cutting through arduous processes and allowing development of more affordable housing products by right, as well as incentivizing affordable housing development. Through the affordable housing action plan, the City intends to pursue priority programming aimed at low-to-moderate income households (80-120% AMI, and below) with regard to not only finding housing, but also staying in safe, comfortable, and affordable housing options within the city. Norman recognizes the need for non-displacement protections and support which affect the most vulnerable of our households. Within Norman, non-white, specifically black renter households are affected the most by cost burdening. Our proposal looks to protect these most vulnerable of persons within our community.

Zoning, especially codes adopted in the mid 1900’s, are vestiges of the redlining practices that furthered segregation. Four years before Norman’s Zoning Code was adopted, the University of Oklahoma enrolled its first BIPOC student. Oklahoma also has a fraught, but ever-improving, history with First Americans. Today, large portions of the far eastern side of the City are Citizen Potawatomi and Absentee Shawnee Tribal Lands. Norman intends to promote desegregation by removing barriers to affordable and attainable housing options throughout the City. The projects outlined within this application are representative of the efforts that Norman believes will promote desegregation within the City.

The naturally occurring affordable housing within the city of Norman is currently experiencing strong development pressures. When redeveloped, the homes going in are neither affordable nor



attainable. It is the City's desire that, by allowing additional housing types, flexibility of standards, and simplified processes would cultivate multiple housing types throughout the city, encourage mixed-income housing development, and remove concentration of affordable housing types, while maintaining anti-displacement standards of care.

The approach to protecting the unique housing needs of members of protected class groups such as persons with disabilities, families with children, and under-served communities of color is two-fold. Throughout the parking study and Zoning Code and Subdivision Regulation update processes, the city intends to incorporate special regulations aimed at protecting housing for these communities, as well as incorporating universal design principles into the final code product. The Zoning Code and Subdivision Regulations will apply a fair, accessible code evenly across the board. While it will be highly flexible, it will also be consistent. The more accessible the code is, the lower cost housing products can be, and the more approachable smaller projects can be for those with less – they can build/maintain more easily without the need for extremely complicated processes.

The affordable housing action plan will center these stakeholder groups throughout the process. AIM Norman's housing plan was developed with community stakeholders, but we acknowledge that there were people missing from the conversation. As part of this plan, Norman looks to complete focused stakeholder engagement with these groups, as well as groups within our CDBG Neighborhoods program. By conducting focus meetings across multiple day and time periods, we can cater to the specific needs of each group. Additionally, we plan to do focused outreach at locations such as the senior center, public libraries, food banks, and on public transportation to increase the probability that we are clearly representing all groups.

The activities proposed within this application, while not providing any actual development of housing units, endeavors to limit and mitigate displacement of future development activities by promoting anti-displacement measures such as the right-of-first-return and first-right-of-refusal. Additionally, outlined in the affordable housing action plan will be programming for housing support and maintenance. Once a household has found an attainable option, the city endeavors to support the household in stability and remaining there. Additionally, all materials (including final products) and outreach efforts will adhere to ADA standards, as well as any other federal, state, and local requirements for such items.

Equity is an ever-growing part of municipal work and the public process. As additional considerations are available from public and professional sources, our office accounts for this information and integrates it into our professional practices. As the activities are outlined within our proposal are intended to be led by the Planning Department; the American Planning Association code of ethics, APA Planning for Equity Policy Guide, and continued research into equitable planning processes serves as the North Star of our efforts.

Each year, HUD invests billions of federal dollars into distressed communities across the country for projects. Projects include:

- Building and rehabilitating housing
- Improving a variety of infrastructures
- Building community centers
- Helping families achieve stability and advancement

The Section 3 program requires recipients of HUD funding to direct employment, training, and contracting opportunities to low-income individuals and the businesses that employ these persons

within their community. Section 3 is a provision of the HUD Act of 1968 and is found at 12 U.S.C. 1701u. The regulations are found at 24 CFR Part 75.

Per this statutory language, recipients of HUD funds (i.e. grantees and contractors) ensure that “to the greatest extent feasible,” when certain HUD funds are used to assist housing and community development projects, preference for construction-related training, jobs, and contracting opportunities go to low- and very-low income people and to businesses that are owned by low- and very-low income persons or businesses that hire them. These opportunities are both gender and race neutral.

Other equity considerations informed by local circumstances include the city of Norman is largely impacted by our student residents as the home to one of the states top universities. It will be important to include student groups during the planning process to ensure housing that meets student affordability needs does not impact other household makeups.

Success of the grant-funded activities efforts on promoting desegregation, expanding equitable access to well-resourced areas of opportunity, and furthering the de-concentration of affordable housing will be determined through the use of key metrics – to be identified based on available data during the Affordable Housing Action Plan phase, but may include:

- Homeownership by race
- Housing cost burden by income
- Homelessness by disability status
- Evictions by race
- Home purchase loan denial by race
- Homelessness by veteran status
- Rent burden by income
- Based on available data

Once determined, an annual report will be produced.

The applicant is not proposing the use of PRO Housing funds to fund housing units, and thus will not be affirmatively marketing units. This will be a consideration of any programming outlined in the affordable housing action plan for items that do result in the development of homes.

# BUDGET AND TIMELINE

## Estimated Costs

Project #	Description	Estimated Costs
1	Zoning Code and Subdivision Regulation Overhaul	\$500,000.00
2	Neighborhood Pattern Book	\$200,000.00
3	Parking Study	\$100,000.00
4	Affordable Housing Action Plan	\$200,000.00
-	Contingency	\$100,000.00
-	Administrative Costs	\$100,000.00
-	Staff Time	\$163,000.00
<b>TOTAL</b>		<b>\$1,363,000.00</b>
Total City of Norman Contributions		\$363,000.00
<b>TOTAL AWARD REQUEST</b>		<b>\$1,000,000.00</b>

The \$1.2M budget was developed based on quotes from previous plan experiences and projects funded by other local entities. For Example, in 2023, Edmond, Oklahoma contracted out for a Unified Development Ordinance update to their Zoning Code for roughly \$490,000.00. Based on the costs of previous plans and municipalities operating similar activities, we anticipated expenses. Each proposed amount is in alignment with industry standards and is cost-effective. Additional contingency dollars are included in the event prices for these items have increased. Ten percent administrative costs were assigned consistent with the practices and policies of Norman, Oklahoma.

The budget will be managed through the Development Services Department, GDBG Grants Division. Funding will be allocated to individual divisions to conduct related activities as deemed necessary.

While the City of Norman has proposed an application in the amount of \$1.2M, it is understood that funding may be awarded at a lower levels. All proposed activities outlined within this application are high priority items for the City of Norman. In the event that HUD is unable to award all funds or programming efforts, the City intends to pursue them to the best of our abilities. Ideally, all projects would be funded through the PRO Housing programming and the City’s supporting leveraged funds. In order to be most effective, estimated activities may be scaled back to conduct the activity at a lower estimated cost based on awarded funding.

## Timeline

Below is a tentatively proposed schedule based on the activities requested within the application. The schedule may shift based on how long it takes for the grant to be awarded as well as when meetings are available for certain items, such as the acceptance of the code update will be dependent on when it can go to a meeting. However, the length of time associated with each portion of the plan is clearly based off the typical project time associated with these items. All items are intended to be completed by 2027, well before FY2030.

ACTIVITY	TIMELINE
Notice of Funding & Contract Drafting – HUD and Local Contract Approvals	3 Months – February 2025
Notice of RFP/RFQ for Zoning Code and Parking Study released	30 days – May 2025
RFP/RFQs closed; finalist interviews; consultants chosen	15 days – May 2025
Projects awarded & Contracts Draft; Contracts approved by City Council	15 days – June 2025
Kick-off for Zoning Code and Parking Study	18-20 Months – June 2025 6 Months – June 2025
Parking Study Completer – Informing Zoning Code Update	December 2025
RFP/RFQs for Neighborhood Pattern Book and Affordable Housing Action Plan released	30 days – June 2026
RFP/RFQs closed; finalist interviews; consultants chosen	15 days – July 2026
Project awarded & Contract Draft; Contracts approved by City Council	15 days – August 2026
Zoning Code Adopted	December 2026 - February 2027
Kick-off for Neighborhood Pattern Book and Affordable Housing Action Plan including influence from Zoning/Parking Efforts	12 Months – August 2026 10-12 months – August 2026
Neighborhood Pattern Book and Affordable Housing Action Plan Adopted	August 2027
Maintenance and Monitoring	September 2027 onward



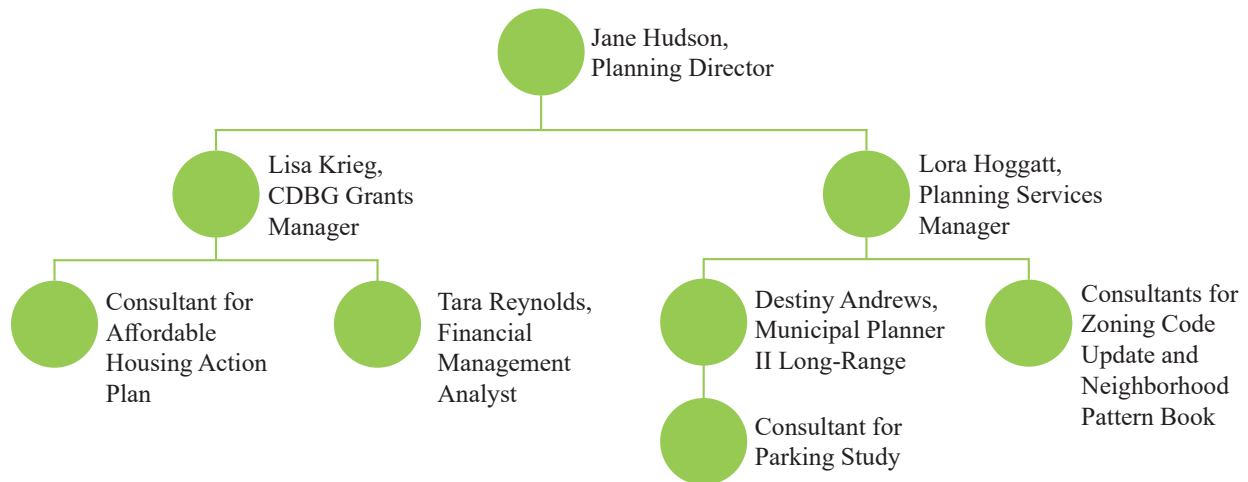
# EXHIBIT E: CAPACITY

**PATHWAYS TO REMOVING OBSTACLES  
TO HOUSING (PRO HOUSING)  
CITY OF NORMAN, OKLAHOMA  
GRANT PROPOSAL**



## CAPACITY

The City intends to have four full-time staff commit expansive amounts of time to the projects, including the following as outlined in the below chart:




- Lora Hoggatt will oversee the Zoning Code update process and coordinate with the consultant.
- Destiny Andrews will oversee the consultation process for the parking study and will report directly to Lora Hoggatt.
- Lisa Krieg will manage the process for the affordable housing action plan, as well as oversee grant administration through Tara Reynolds.
- Tara Reynolds will report to Lisa Krieg and will maintain all associated reporting documentation with regards to the projects.
- All parties will report to Jane Hudson, Planning Director, regularly to ensure a timely product.

There is no position within the city that is contingent upon the award of this grant.

The City of Norman Planning Services Division will be the lead agency or entity for all projects within this application. The role of the city will be to liaison between consultant groups and the public, while guiding the policy and regulation creation. City Staff will work with partner agencies during the stakeholder process and will manage consultants for these projects. City Staff have experience in contracting with consultant organizations in order to complete large-scale planning efforts, most recently with the AIM Norman process. The AIM Norman planning process resulted in the drafting of the new Land Use Comprehensive Plan, as well as additional plan updates to the Water, Wastewater, Stormwater, Transportation, Parks, and Housing Plans. Norman has effectively leveraged City dollars for this, and other similar projects in the past and has ample experience with procurement procedures. Further, the City of Norman is an entitlement municipality within the CDBG program, has worked on projects receiving HOME funding, and has experience leveraging grants and working with federal dollars. The City is confident in its ability to quickly launch and implement these major projects within the required time frame for the PRO Housing grant.

One the projects are completed, The City of Norman, with power established by the State of Oklahoma, as governed by the City Council has the ability and experience to effectively implement the proposed reforms as detailed in this application. No additional government entities are necessary for implementation.

This proposal does not include partnership organizations outside of the stakeholder engagement



process. While the City will be working with consultant firms or organizations for the activities outlined within this application, the City of Norman has ample experience working with these types of partners, including past iterations of all plans most recently updated with the AIM Norman process. There is no foreseen dependency on partner capacity to design, plan, or remove barriers to housing within this application.

This application was prepared by applicant staff, specifically those who will be involved with the implementation process, if awarded.

Applicant staff engaged with this application include:

- Destiny Andrews, Municipal Planner II – Long-Range, City of Norman
- Lora Hoggatt, Planning Services Manager, City of Norman
- Lisa Krieg, CBDG Grant Manager, City of Norman
- Tara Reynolds, Financial Management Analyst, City of Norman

City staff has experience working with and analyzing data regarding economic or racial disparities on previous planning projects.





# EXHIBIT F: LEVERAGE

**PATHWAYS TO REMOVING OBSTACLES  
TO HOUSING (PRO HOUSING)  
CITY OF NORMAN, OKLAHOMA  
GRANT PROPOSAL**

# LEVERAGE

The City of Norman proposes to leverage city dollars to support the ongoing efforts to remove obstacles to affordable housing. Specifically for this grant, Norman intends to leverage 20% of awarded funds, or \$200,000.00 towards projects outlined within the grant application, as well as \$163,000.00 in staff time, for a total City contribution of 36.3%, or \$363,000.00, of total project costs.

In addition, Norman will continue to leverage city dollars to support the production and preservation of affordable housing within the city by continuing the efforts outlined in Exhibit B, under existing initiatives.

Resources for this project are firmly committed to by City Council, via Resolution R-2425-51, as supplied. Resources were firmly committed on October 8, 2024.

**Resolution**  
R-2425-51

A RESOLUTION OF THE COUNCIL OF THE CITY OF NORMAN, OKLAHOMA, AUTHORIZING THE CITY MANAGER OR HIS DESIGNEE TO SUBMIT A GRANT APPLICATION TO THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT PATHWAYS TO REMOVING OBSTACLES TO HOUSING GRANT PROGRAM FOR FUNDING TO UPDATE THE ZONING CODE AND SUBDIVISION REGULATIONS, CREATION OF A NEIGHBORHOOD PATTERN BOOK AND ASSOCIATED PRE-APPROVED PLANS, A PARKING STUDY, AND CREATION OF AN AFFORDABLE HOUSING ACTION PLAN; EXPRESSING ITS COMMITMENT TO SEEK FUNDING FOR LOCAL LEVERAGE (\$200,000) IF SUCH GRANT IS AWARDED AND PROJECTS APPROVED.


NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF NORMAN, OKLAHOMA:

§ 8. THAT the City of Norman, Oklahoma, hereby authorizes the City Manager or his designee to submit a grant application to the U.S. Department of Housing & Urban Development's Pathways to Removing Obstacles to Housing (PRO Housing); and

§ 9. THAT the City of Norman, Oklahoma, expresses its commitment to seek funding for the local match through either the General Fund, Capital Fund, or any other available local funding source allowed by law if the City receives such grant and the project is selected.

PASSED AND ADOPTED this 8<sup>th</sup> day of October, 2024.

ATTEST:  
*Brenda Hall*  
City Clerk



1



Phone: 405-307-7112  
www.normanok.gov

October 8, 2024

U.S. Department of Housing and Urban Development  
Office of Grant Programs  
451 7th Street, S.W.  
Washington, DC 20410

RE: Letter of Commitment for the PRO Housing Notice of Funding Opportunity

Dear Sir or Madam:

We the City Council would like to express our strong support for the grant application submitted by the City of Norman. We believe that the proposed projects, which involve a Zoning and Subdivision Regulation Update, Neighborhood Pattern Book & Pre-Approved Plans, Parking Study, and Affordable Housing Action Plan, will have significant positive impacts on the availability of affordable and attainable housing, which will directly increase quality of life for the residents of Norman. The City of Norman is committed to providing \$200,000 in local funds to be used as leverage in support of this application.

As an elected Council responsible for overseeing capital funds and promoting a more inclusive city, the City Council has directly contributed to the grant application through the AM Norman Comprehensive Land Use and Housing Plans. These Plans include analysis of current housing market studies, regulatory barriers, and prioritized actions designed to improve attainability and reduce disparities.

The City Council fully supports this grant application and will ensure that local funding is prioritized for its projects. The Council will also help ensure that the City of Norman will carry out this project with the utmost professionalism, efficiency, and effectiveness.

We are committed to supporting the City of Norman staff in any way we can, and believe that this grant will provide the necessary resources and support needed to make this project a success. We would like to extend our heartfelt gratitude to the Office of Grant Programs for considering the City of Norman's request.

Thank you for your time and consideration.

Sincerely,

*Brenda Hall*  
Larry Hebbala  
Mayor, City of Norman, Oklahoma | City Council

Building an Inclusive Community

Full size copies of the resolution and support letter are available as attachments to this application.



# EXHIBIT G: LONG-TERM EFFECT

**PATHWAYS TO REMOVING OBSTACLES  
TO HOUSING (PRO HOUSING)  
CITY OF NORMAN, OKLAHOMA  
GRANT PROPOSAL**


## LONG-TERM EFFECT

One of the most prominent barriers identified to affordability (pg. 13) was the impact of outdated regulations on current development. There is an identified mismatch between market requirements, building codes, and the Zoning and Subdivision Regulations which each of the other items rely on. Updates to the regulations would allow the city to get out of its own way and promote the types of affordable, attainable housing that we would like to see within our city. Underproduction, as a result of regulatory misalignment has affected many parts of the country, but is prominently felt in Oklahoma where a high influx of migration from other states has increased the need for housing on a previously unforeseen scale. A successful program would allow the City of Norman to adjust our processes to directly address identified barriers in such a way that would enable building practices within the city to change for years to come. The current lifetime of the AIM Norman plan is until 2045, but the City endeavors to build a more inclusive city, resiliently for years to come. Paired with the Affordable Housing Action Plan, to be developed on the tail end of the zoning regulation updates, this plan will help us (knowing that our regulations for the type of development we'd like to see are in place) attack the more programmatic side of these practices – including but not limited to additional anti-displacement efforts, housing affordability efforts, rehab, maintenance, and monitoring efforts. The Affordable Housing Action Plan will identify how to strengthen partnerships to create and maintain additional funding mechanisms which will in turn create capacity within the city to operate these programs in perpetuity.

One perceived outcome from a result of grant-funded activities is the decrease in concentration of low-income households and increased production of mixed-income housing. Mixed-income housing, whether it is in one building or sprinkled throughout a neighborhood or district, offers many social advantages to all residents. When low-income individuals and families are concentrated in one area, that area is often disinvested, and the residents are less likely to have access to quality grocery stores, distinguished schools, or favorable job options. Rather, in a mixed-income neighborhood, low-, middle-, and high-income residents all have access to the same spaces and places as one another, giving a more even playing field for all who call the neighborhood home. Mixed-income housing also provides mental benefits to residents. Lower-income individuals have expressed that they are more comfortable in a mixed-income neighborhood, that they feel safer and more confident leaving home. They also feel greater pride in their neighborhood and are more likely to keep their owned or rental property better maintained. Middle- and high-income residents build an appreciation for income diversity among neighbors. These neighborhoods also provide benefits to children, giving them the opportunity to play with and learn from other children who may live differently than their own family.

Upon completion of the grant-funded activities, the City of Norman will have – a) a completed Parking Study extrapolating foreseen effects of min/max parking requirements on housing supply with results incorporated into, b) an updated Zoning Code and Subdivision Regulation section of the code which will encourage desired development patterns including mixed-use, live-work, and traditional neighborhoods, d) a Neighborhood Pattern book and associated Pre-Approved Plans, and d) an Affordable Housing Action Plan set to attack more long-term, programmatic issues within the city pertaining to affordable housing .

Norman is uniquely positioned, not just as the home of a land-grant university in a growing metro area, but also as a mid-sized American city, to set the standard for what it means to plan and grow



as an affordable city. Norman is the third most populous city within Oklahoma, behind the City of Oklahoma City and City of Tulsa, and our population of roughly 130,000 still means, we are comparatively small. The development pattern of the city is consistent with many railroad cities within the Midwest. While we have many unique features, Norman deals with challenges that face almost all American cities on a daily basis; drought and water concerns, infrastructure in need of updates, a tight housing market with many missing middle products, and other influential factors that Norman can set the stage for.

A successful outlook for the end of the performance period will be that the city is poised to produce housing at the required rate to meet the anticipated need for 2045. This will happen, in tandem with anti-displacement and supportive housing programming as established through the Affordable Housing Action Plan. There is a delicate balance between producing affordable and mixed-income housing throughout the city and limiting displacement and segregation within our borders. A successful use of PRO Housing grant funds for the programming as outlined within this application will address the needs for affordable housing today, tomorrow, and for years to come, while allowing people to live, work, play, and age-in-place in their homes here comfortably.





## ATTACHMENT A: SUMMARY OF COMMENTS RECEIVED ON PUBLISHED APPLICATION AND LIST OF COMMENTERS BY NAME/ ORGANIZATION

- **Question on how application is approaching gentrification, specifically regarding aging in place. Provided an anecdote about a redevelopment where an existing tenant was able to move back into a unit once redeveloped.**

*Staff responded with intent to include Right-to-Return in exploration of Zoning Code update.*

**Question on if pre-approved plans will account for accessibility.**

*Staff responded with direction from AIM Norman Housing Plan to include universal design in Pre-Approved Plans.*

**Question on how these plans will protect the naturally affordable housing that does exist.**

*Staff responded with the intent to explore Right-to-Return and Right-of-First-Refusal, inclusion of flexibility in the code making renovation and rehabilitation easier, as well as promoting the protection of affordable housing through the Character Area policies developed in AIM being folded into the Zoning and Subdivision Regulation update.*

**“If you guys just provided the plans, then we could get this thing done!”**

David Boeck | Architect | Public Hearing October 2, 2024

- **“You’ve addressed so many of the things we’ve been discussing over the last couple months [in the AIM Steering Committee Meetings].”**  
**“Just the fact that we are dovetailing this with all of the work that is coming out really demonstrates that we have already set us up to do this work now... And this is really just excellently thought out.”**

**“I’m excited. We’ve been talking about this pattern book concept, for at least three or four years.”**

Lee Hall | AIM Norman Steering Committee Member | Public Hearing October 2, 2024

- **Expressed desire to include tools like inclusionary zoning and community land trusts in these processes.**

*Staff responded that these items can be explored in the Zoning Code update and in the Affordable Housing Action Plan respectively.*

Helen Grant | Norman City Councilmember | Public Hearing October 2, 2024

- **“When you change legislation, when you change the way things are done from the beginning, that is what actually creates affordable housing.”**

Shavonne Evans | AIM Norman Steering Committee Co-Chair | Public Hearing October 2, 2024

## ATTACHMENT B: CERTIFICATION OF COMPLIANCE WITH NOFO PUBLIC PARTICIPATION REQUIREMENTS

The City of Norman provided for public participation in the following ways:

- Notification of public participation opportunities were noticed in the Journal Record on September 26, 2024 (see pg. 44).
- The application was readily available on the City’s website at: <https://www.normanok.gov/your-government/departments/planning-and-community-development/grant-programs/pro-housing-grant>
- Physical copies of the application materials were made available at the Norman Public Library and at the City of Norman Development Center in downtown Norman.
- A public hearing for comment hosted on October 4, 2025. The meeting included a short presentation describing the PRO Housing Grant Program, and Norman grant application.
  - Flyers for the meeting were posted at various locations throughout the City including: laundromats, health clinics, grocery stores, the food bank, and libraries.
  - Flyers were also provided to Norman’s public transportation, EMBARK, and Norman’s Mobile Meals partner for distribution.
- An article was printed in the Norman Transcript local newspaper on October 5, 2024 with a write-up of the October 4, 2024 meeting and with additional contact information for public comment (see pg. 44)
- The PRO Housing Application was on the City Council agenda for the October 8, 2024 meeting.
- All comments outlined within Attachment A were considered by staff, and included as necessary.

The City of Norman is confident that our compliance with public participation requirements meet and/or exceed those requested by HUD.



Flyer, as posted at Sooner Wash Laundromat.



Flyer, as available at Norman Public Library, West Branch.



Flyer, as available at Norman Public Library, Santa Fe Branch.

Additional examples of public outreach are available on pg. 44.

(MS2653914)

**NOTICE OF PUBLIC HEARING**

NOTICE is hereby given that the City of Norman's proposed Funding Application for the PRO Housing - Pathways to Removing Obstacles (FR-6800-N-98) in the amount of \$1,000,000 is available for a 15-day public review beginning September 26 through October 11, 2024. More information regarding this funding opportunity is available at [www.hud.gov/program\\_offices/comm\\_planning/pro\\_housing](http://www.hud.gov/program_offices/comm_planning/pro_housing). A Public Hearing will be conducted on October 4, 2024 from 11 A.M. to 1 P.M. in Conference Room A of the Development Center at 225 N Webster Avenue. The item will appear on October 8, 2024 at the regularly scheduled City Council Meeting on the consent docket.

This application for funding includes strategies for the City of Norman actively taking steps to remove barriers to affordable housing development. Copies of the draft of the proposed application are available for review from 8:00 a.m. to 5:00 p.m. Monday through Friday in the Department of Planning & Community Development at 225 N Webster. Hard copy drafts will also be available at the Norman Public Library at 121 S Santa Fe Ave, Suite 119. A draft is also available on the City of Norman website [www.NormanOK.gov](http://www.NormanOK.gov).

Any comments or views of citizens received in writing during the comment period, or orally at the public hearing, will be considered in preparing the final application. A summary of the comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the final amendments. The proposed use of funds is hereby published below.

Zoning Code and Subdivision Regulation Overhaul - \$500,000.00  
Neighborhood Pattern Book - \$200,000.00  
Parking Study - \$100,000.00  
Affordable Housing Action Plan - \$200,000.00  
Contingency - \$100,000.00  
Administrative Costs - \$100,000.00  
TOTAL - \$1,200,000.00  
Total City of Norman Contributions - \$200,000.00  
TOTAL AWARD REQUEST - \$1,000,000.00

Comments must be received prior to October 11, 2024. For additional information please contact Destiny Andrews at 405-366-5302 or [destiny.andrews@normanok.gov](mailto:destiny.andrews@normanok.gov). (9-26-24)

*Public Notice, as printed.  
Courtesy of Journal Record.*

# Norman Seeks \$1M HUD Grant for Affordable Housing

**KATRINA CRUMBACHER**  
FOR THE TRANSCRIPT

To further the city of Norman's long-term goal to generate more affordable housing, the planning department will \$1 million from the U.S. Department of Housing and Urban Development.

The city hopes to take advantage of HUD's Pathways to Removing Obstacles to Housing grant initiative, which is designed to support "communities who are actively taking steps to remove barriers to affordable housing," according to the grant website.

"Every Norman resident deserves to live in a safe, comfortable home they can afford, and neighborhood improvements should not increase displacement," the grant proposal reads. "Achieving this vision will call for action at all levels including the city of Norman, its partner organizations, neighboring communities, residents, and state and federal assistance."

If approved, the \$1 million grant is set to be appropriated to fund the following four projects:

- Update Norman's zoning code and subdivision regulations, estimated to cost \$500,000
- Develop and adopt a neighborhood pattern book of pre-approved housing designs, estimated to cost \$200,000
- Conduct a parking study to determine the impact of minimum to maximum regulations on housing affordability, estimated to cost

See HUD on A3

*October 5, 2024 article on PRO Housing grant application, as printed.  
Courtesy of Norman Transcript.*

## HUD

CONTINUED FROM A1

\$100,000

- Produce an affordable housing action plan, estimated to cost \$200,000

The grant proposal is part of a larger push by AIM Norman, an area and infrastructure master plan dedicated to capitalizing on the "community's strengths and identify fresh opportunities, all aimed at enhancing the overall quality of life in Norman," according to the AIM Norman website.

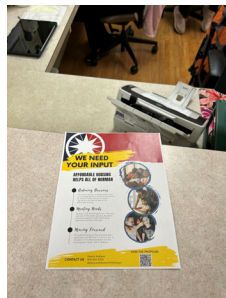
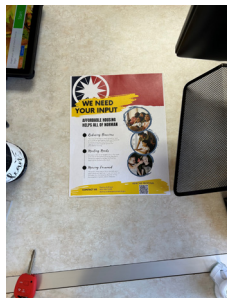
On Friday, Norman city planner Destiny Andrews held a public hearing for the grant proposal application, and six people showed up: Helen Grant, council member representing Norman's Ward 4; Shavonne Evans and Lee Hall, both members of the AIM Norman Steering Committee; former University of Oklahoma associate professor of architecture David Boeck and two others.

"I think one of the biggest things is the steering committee and staff want to be very responsive to the existing character of the areas, what's already on the ground, and we want to do that through providing flexibility," Andrews said. "It's really hard to redevelop on a smaller scale, so having a code that provides that flexibility allows you to build smaller, to build less expensive housing, as well as strengthening protections."

If the \$1 million grant proposal is approved, the city of Norman intends to contribute \$363,000 to the development of the PRO Housing projects, the last of which is expected to be complete by August 2027. The deadline to submit the grant proposal is set for Oct. 15.

"I like to look through the glass half-full," Hall said. "It sounds like if we move in this direction, it gives you as a planning department a more holistic way of looking at projects and being able to move them through."

As required by HUD, the city of Norman's planning department must allow a 15-day period for public comment, which ends on Oct. 11. Any public comment must be directed to Norman municipal planner Destiny Andrews, who can be reached at [destiny.andrews@normanok.gov](mailto:destiny.andrews@normanok.gov).



*Flyers from left to right, as available at Variety Care Porter Avenue Location, Norman Public Library East Branch, Variety Care Alameda Street Location, and Highlander Laundromat.*

## ATTACHMENT C: ADVANCING RACIAL EQUITY NARRATIVE

As part of the AIM Norman planning process (described in detail on pages 5, 9, 19, and 26 of the application materials) a market study was conducted by the consultant. The market study accounted for various metrics of disparity, including race, income, household makeup, and ability. The recency of this study allows the City of Norman to pair information from the market study with our most recent Analysis of Fair Housing Choice, completed in September of 2020, to curate a complete picture of the racial composition of the persons and households that will benefit, directly or indirectly, from the proposed award activities. Selected detailed results from these studies are available on the next page (pg. 45) of this attachment.

Due to the nature of the proposed award activities, primarily planning functions, associated barriers to persons or communities of color equitably benefiting from the activities are:

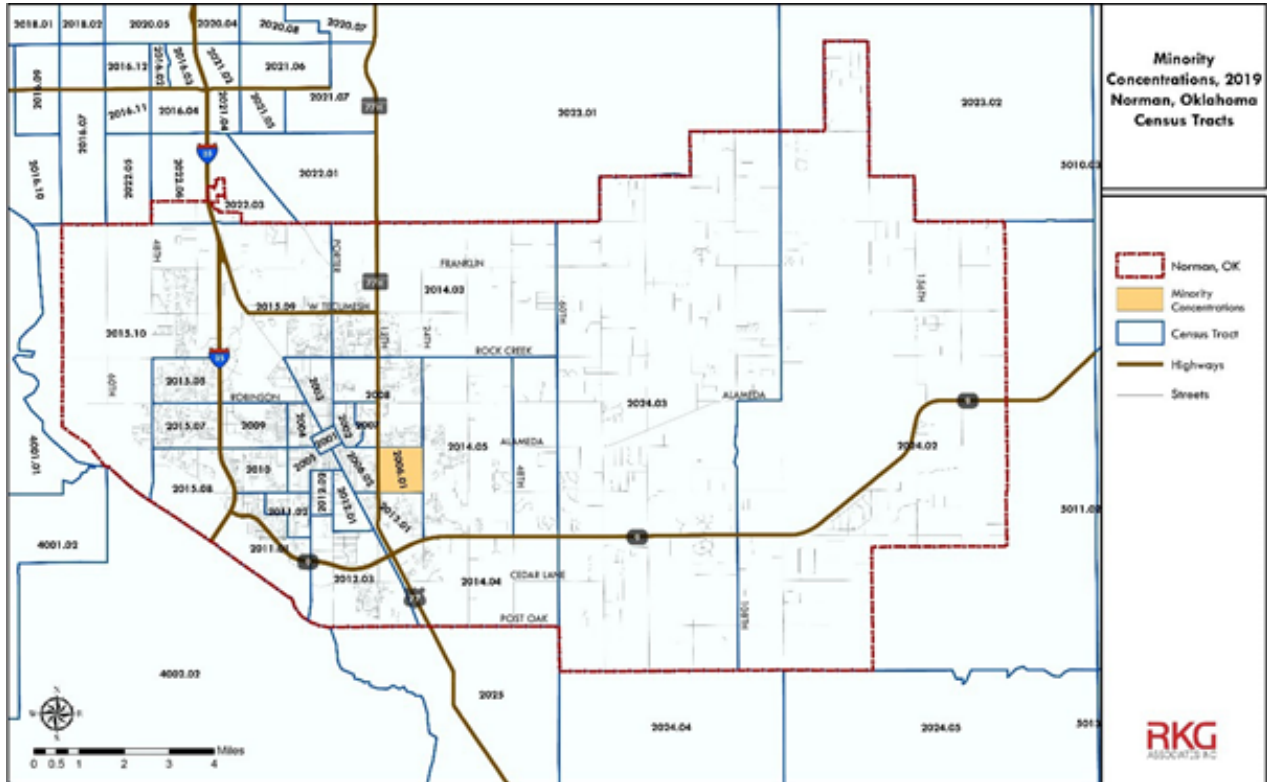
- Fewer voices at the table, lessening the impact of benefits for these communities.
- Black families in Norman are more likely to be cost burdened and less likely to be homeowners and may be least likely to benefit directly from Zoning Reform and Pre-approved plans in the short-term, while construction of affordable housing is less common.
- Black and Hispanic and/or Latiné communities within Norman are more likely to be exposed to poverty and may be less likely to benefit from planning activities. However, the anticipated long-term impacts of reducing barriers to affordable housing, and continuation of efforts after the proposed award activities are intended to prioritize these communities.

In order to prevent, reduce, or eliminate the barriers minority communities within the City of Norman will have regarding the proposed award activities, it will be imperative that the stakeholder involvement process meet minority communities where they are at. By conducting focus meetings across multiple day and time periods, we can cater to the specific needs of each group. Additionally, we plan to do focused outreach at locations such as the senior center, public libraries, food banks, and on public transportation to increase the probability that we are clearly representing all groups.

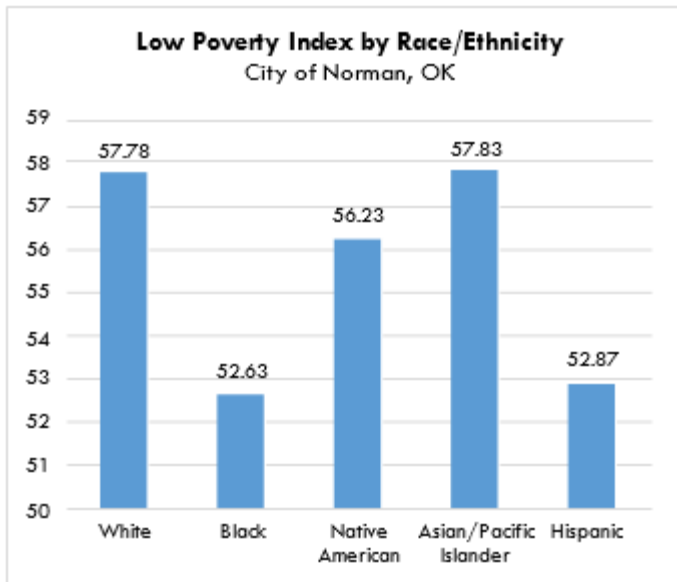
Success of the grant-funded activities efforts on promoting desegregation, expanding equitable access to well-resourced areas of opportunity, and furthering the de-concentration of affordable housing will be determined through the use of key metrics – to be identified based on available data during the Affordable Housing Action Plan phase, but may include:

- Homeownership by race
- Home purchase loan denial by race
- Housing cost burden by income
- Homelessness by veteran status
- Homelessness by disability status
- Rent burden by income
- Evictions by race
- Based on available data

Once determined, an annual report will be produced.



In Norman, only one census tract has a minority concentration. This census tract is included in the City’s CDBG qualified census tracts and is one of the priority locations outlined in the Stakeholder Section of Exhibit D, where increased efforts for public participation will occur.



Source: HUD AFFH Data Version AFFHT0004a and RKG Associates, Inc., 2020 Low poverty index by race/ethnicity. From Norman’s 2020 Analysis of Fair Housing Choice.

RACE	PERCENT OF NORMAN
White Alone	74%
Black or African American	5.3%
American Indian & Alaska Native	4.5%
Asian	4.3%
Native Hawaiian & Other Pacific Islander	0.1%
Some Other Race	1.1%
Two or More Races	10.7%

Hispanic or Latiné 9.2%

Source: American Community Survey

## **ATTACHMENT D: AFFIRMATIVE MARKETING AND OUTREACH NARRATIVE**

It is crucial to the City that all award activities outlined within this grant application are marketed equitably to stakeholder groups who may benefit from said activities. As such it is imperative that marketing activities effectively communicate information about opportunities for involvement with the planning processes to groups of all races, income levels, abilities, and ages. The City intends to market materials for proposed award activities via, though not limited to, the following actions:

- Providing flyers in intentional spaces such as libraries, clinics, laundromats, public transit centers, food banks, and the senior center.
- Flyers and program information will be provided to community partners and organizations such as Meal on Wheels of Norman, Norman neighborhood alliance groups, and others.
- Meetings will be held multiple dates and times; special consideration for meetings within the qualified census tract outlined in Attachment C will be made.
- Materials will be presented and/or printed in accessible fonts with high contrast for low-vision and dyslexic persons.
- Materials may be made available in multiple languages, consistent with Title VI Low English Proficiency (LEP) obligations. The most commonly spoken language in Norman, besides English, is Spanish.

For all contracted services regarding the award activities, as outlined, the City of Norman will adhere to the same standards of marketing contracting opportunities as it does with all other work - adhering to the RFP/RFQ practices at the City of Norman, including requiring Contractors to comply with a certificate of nondiscrimination. Further, each year, HUD invests billions of federal dollars into distressed communities across the country for projects. The Section 3 program requires recipients of HUD funding to direct employment, training, and contracting opportunities to low-income individuals and the businesses that employ these persons within their community. Section 3 is a provision of the HUD Act of 1968 and is found at 12 U.S.C. 1701u. The regulations are found at 24 CFR Part 75.

Per this statutory language, recipients of HUD funds (i.e. grantees and contractors) ensure that “to the greatest extent feasible,” when certain HUD funds are used to assist housing and community development projects, preference for construction-related training, jobs, and contracting opportunities go to low- and very-low income people and to businesses that are owned by low- and very-low income persons or businesses that hire them. These opportunities are both gender and race neutral.

## **ATTACHMENT E: EXPERIENCING AND PROMOTING RACIAL EQUALITY NARRATIVE**

The City of Norman is an entitlement municipality within the CDBG program and has previously worked on projects receiving HOME funding. City staff has experience within these programs addressing the needs of underserved communities within our City.

As described within the narrative section Exhibit D: Soundness of Approach, Stakeholder and Affirmatively Furthering Fair Housing (AFFH) items (pgs. 26-29), Attachment B: Certification of Compliance with NOFO Public Participation Requirements, Attachment C: Advancing Racial Equity Narrative, and Attachment D: Affirmative Marketing and Outreach Narrative, staff is well versed in soliciting, obtaining, and applying input from such groups when designing, planning, or implementing programs and activities, and has seriously considered the impact of proposed grant funded activities on such communities.

Key aspects of serving historically marginalized communities are conscientious and meaningful efforts towards inclusion. This may include purposefully organizing outreach opportunities in partnership with community cornerstone organizations and persons, such as schools, places of worship and community representatives, as well as ensuring that public participation opportunities are open and available to people of many backgrounds. Holding meetings at places where children are able to be safely supervised while parents are actively engaged in public processes, serving food during meal times, or working with local employers to hold meetings or table in break rooms are additional ways to engage with members of the public who may otherwise be disenfranchised with regards to public input.

City of Norman staff intend to use these types of strategies to ensure we effectively address the needs of underserved communities, particularly Black and Brown communities throughout the proposed grant funded activities.