

November 4, 2025

RECEIVED IN THE OFFICE
OF THE CITY CLERK
ON 11-7-25

Norman Planning Commission
225 N. Webster Avenue
Norman, OK 73069

RE: Premium Land, LLC
Requested Amendment of AIM Norman Comprehensive Land Use Plan

From: Urban Reserve Designation and Urban Low Density
To: Urban Low Designation and from A-2, Rural Agricultural District, to a PUD

Planning Commission:

Thank you for allowing the Public the opportunity to express our sincere input into whether this proposed change to the AIM Norman Comprehensive Land Use Plan (Plan) should be approved. I encourage you to consider deeply this decision as it represents "precedence" in how future applications will be evaluated and decided. **I am opposed to the requested Amendment of the AIM Plan and the proposed PUD resulting in densifying an area of rural east Norman that is not currently an established need or consistent with the character of the area.**

I am not located within the required 350' notification radius, my residence is approximately 2000' from the proposed development (see attached Map & required Trust identifying myself as Trustee with authority to sign this protest). However, our subdivision (Burlwood Country Estates - 10 acre minimum) has parcels located within the required Public Notice radius of the proposed development. I encourage you to consider each letter of comment seriously. One of the problems in rural Norman is that our voices seem very small since our area of notification only includes around 10 property owners due to current parcel size of 10 acres and larger. **I request that my protest, and any other protests within the recently expanded "Urban Reserve Designation" also be shown on the protest map, even though we may be beyond the 350' radius required notification. The results of this application in front of the Commission will significantly affect all property owners in this area. This is a precedence setting action on how the new AIM Plan will be interpreted and implemented by the Commission on every subsequent application whether the Turnpike comes through this area or not.**

I have been a resident in this location for over 25 years and have been keenly aware of the historical City planning for rural east Norman throughout the last 35 years. I am a civil engineer and land surveyor who has worked extensively on development projects throughout Norman and fully understand the process. The developer has the right to pursue a requested change in the land use designation and rezoning. However, **approval of that request is not in any way an obligation associated with the AIM Plan.** I am pro-development, but also for the logical progression of extending our development core at the right time and in the right locations to promote in-fill,

redevelopment, and the natural progression of development with reasonably congruent transition development.

I would like to remind you of a few items as you consider this application:

1. **Historical Planning & Cultural Preservation** – The City of Norman has consistently and repeatedly expressed a desire to preserve the cultural diversity and natural environment of rural east Norman, most notably by consistently and consciously allowing developments consisting of 10-acre parcels or larger.
2. **Recent AIM Plan Approval** – As you are aware, the City of Norman recently approved the AIM Plan. The City chose to extend and create the potential to “encroach” into rural east Norman by designating this subject property as “Urban Reserve”. However, **the Plan does not guarantee that a proposed development warrants any specific change from “Urban Reserve” to “Urban Low”** since many other factors are required to be satisfied to be consistent with the overall expressed intent of the AIM Plan.
 - a. The Plan itself talks extensively about encouraging in-fill development, avoiding urban sprawl, avoiding unnecessary extensions of infrastructure and preserving and protecting the natural environment.

Contiguous development and developing on infill sites reduces costly infrastructure extensions and improves communities. With the extension of any service, the long-term costs, both fiscal and environmental, should be considered.

GOALS

- Identify key mixed-use priority areas that enhance neighborhoods and reuse urban services.
- Balance new development with infill development to reduce infrastructure extensions and promote connectivity.
- To reduce infrastructure extensions and promote connectivity, maintain and improve existing services necessary to support infill development.

The proposed development represents a “leapfrog” development that does not represent “contiguous development”, provides no transitional development, will unnecessarily extend City infrastructure and services, and will promote, by precedence, other similar, premature encroachments into east Norman.

Perhaps the time will come, and maybe by 2045 as the Plan suggests, that some encroachment into rural east Norman may be a logical need.

However, that sequence should be driven by need and transitional progression after encouraging in-fill, redevelopment, and contiguous growth rather than “leapfrog” development. That time is not now.

- b. The Generalized Land Use Map is not intended to be absolute and is intended to consider the local uses, cultural & environmental sensitivity, transitional development, and “character” of the local area in making land use and zoning changes.

3. GENERALIZED MAP

The Land Use Map should be interpreted generally and is not intended to include the specificity or the rigidity of a zoning map or engineering document. The map is meant to show:

- Generalized land use locations and transitions: The boundaries between land uses on the map are meant to show approximate areas for transition, rather than rigid boundaries.
- Collector and Arterial Street connections: Critical arterial and collector street connections are specified on this map, though the exact routes will depend on detailed engineering studies. Local streets will be determined as development occurs.
- Preservation or protection of sensitive areas: The map identifies the largest sensitive areas, where non-recreation oriented development should not occur. The policies within the AIM Norman Master Plans and the Character Areas provide a neighborhood level of detail for sensitive areas and local circulation that apply with the land use categories.

The proposed development is on the extreme eastern edge of the newly mapped Urban Reserve Designation. The AIM Plan encourages that the exact mapping is not considered an absolute rigid boundary. The Planning Commission is given the latitude within the AIM Plan to consider whether the requested change in designation and zoning is appropriate for this specific parcel, at this place in time.

Timing of expanding urban development is relevant within the AIM Plan. Just because the Plan recognizes there “may” be a need by 2045 does not signify that it is appropriate to exercise that potential need today. Things change over time that could accelerate the need or reduce the need. However, once the land is changed, it is changed forever.

- c. To be consistent with the AIM Plan, “Character Areas” is a major item of consideration for the Planning Commission. The location specific character of the area is a major point of emphasis within the AIM plan for decision making.

The character of not only the specific parcel but of the larger surrounding area is one well established as rural. The 10-acre minimum of this area has been fiercely protected by residents and City leaders who recognize the value of preserving this “planned” rural area for decades. Only a very few, “Grandfathered” developments of less than 10 acres exist in the general vicinity of this specific property. This proposed development is not

consistent with the character of history and planning for this area or contiguous development.

Environmentally, this area is within the corridor of 1 of only 2 significant rose rock formations in the world. I personally have significant rose rocks on my property within the same corridor, and it is highly likely that this parcel is within that rose rock band also.

Years ago, when the area had been plagued by erosion and loss of topsoil, the land was stabilized through construction of planned terracing to prevent erosion of the vulnerable soils on this parcel, the vegetation has since been stabilized for decades for the current agricultural use. There are no established channelized stormwater conveyances to the west of this property and stormwater from this development will not be able to reach City controlled drainage easements or rights of way without crossing neighboring parcels to the west whose Owners are also protesting this change in land use and proposed PUD.

3. **Unnecessary Expansion of Infrastructure and Service Area** - The AIM Plan has a major theme of avoiding unnecessary expansion and extension of infrastructure and service areas. This expansion of Infrastructure and Service Area is frequently overlooked with developments as it ultimately discourages infill while placing future financial burdens on the City. It is typical for a new development to have Publicly Dedicated infrastructure such as roads, water lines, sewer service, drainage improvements etc.
 - a. The proposed development density is made possible by the availability of potable water from the existing water well field in east Norman and the water lines along Robinson Avenue that bring the water back to urbanized Norman. It is important to note that this water line and well field was not put in for the purpose of densifying the development in rural east Norman but to provide additional potable water to urbanized Norman that cannot adequately be served by individual water wells. The existing land use designation imposes no water utility burden on the City of Norman. The proposed development will have internal water lines dedicated to the City of Norman requiring maintenance and service.
 - b. The proposed development will have Publicly Dedicated roadways that will be the responsibility of the City of Norman for maintenance. However, the most significant infrastructure burden with densifying development in rural east Norman is roadway safety. Anyone living, or traveling through east Norman knows firsthand how hazardous driving is beyond 24th Avenue NE. Roadway designs, excessive speeds, and distracted or disoriented drivers make it a daily hazard.

If Norman approves this request, many similar densification requests will follow. The City will likely have to accelerate arterial roadway improvements to these areas due to increased major traffic accidents. The section of Robinson Avenue, which will be the frontage road for this development, has significant vertical curve issues and blind spots for a subdivision entrance in that location. Significant vertical curve realignment for the current speed limit would likely be required and is typically a burden born by the City due to complete roadway reconstruction being outside the limits of the proposed development.

- c. Other City Services such as trash, fire, police, water, roadway maintenance, etc. will also have response increased unnecessarily when "leap-frog", non-contiguous developments densify populations further than necessary from those responding providers.

Finally, I would like to remind the Commission of the repeated efforts and actions of others to change rural east Norman for their benefit. These interests once implemented take rural property away forever. This is their right to pursue, and the American way, **we as individual property owners rely on representatives such as yourselves to consider the overarching picture, including smart development progression, when the timing for encroachment of densifying development is right, protection of individuals, conserving resources and culture, and making Norman good for ALL.**

The time may come when Norman must grow into some of the Reserve Urban designation. That time does not seem appropriate for many years, and certainly not for this parcel at this particular time.

I appreciate your consideration of my comments. If you would like to discuss any of these comments, please feel free to call me at 405.740.9777 or email at wrsokswain@gmail.com.

Sincerely,



Bill Swain, PE, PLS
Trustee – The Bill & Diane Swain Revocable Trust
1501 Burlwood Road, Norman, OK 73026

Attachments:

Parcel Map showing Proximity to Proposed Development

Trust excerpts showing signatory as authorized Trustee of Parcel Ownership

