

Tulsa Housing Ecosystem Transformation Initiative
PRO Housing Program

City of Tulsa

September 20th, 2024

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EXECUTIVE SUMMARY

The City of Tulsa's Tulsa Housing Resilience and Equity Initiative PRO Housing proposal is designed to address the critical housing shortages and barriers that have constrained affordable housing production and preservation for decades. Through a combination of strategic, community-driven initiatives and targeted investments, this proposal seeks to permanently remove key barriers, create a more resilient housing ecosystem, and significantly expand housing opportunities for low- and moderate-income residents.

Tulsa faces significant challenges in meeting the affordable housing needs of its residents. With over 13,000 housing units needed in the next decade, the city's existing housing market has been strained by limited housing development, outdated zoning regulations, and underdeveloped capacity among local developers, particularly minority- and women-owned businesses. Furthermore, existing infrastructure deficiencies, high land acquisition costs, and complex regulatory hurdles have compounded these barriers. To address these issues, the City of Tulsa has developed a comprehensive strategy rooted in the Tulsa Housing Strategy, the 2020-2024 Consolidated Plan, and the PLANiTULSA Comprehensive Plan. These foundational documents outline the pressing need for affordable housing in high-opportunity areas, the preservation of existing affordable units, and the expansion of capacity within Tulsa's development ecosystem.

The Tulsa Housing Resilience and Equity Initiative proposal focuses on three key areas:

1. **Developer Capacity Limitations:** Tulsa's affordable housing ecosystem has been historically limited by the small number of nonprofit developers and the significant underrepresentation of minority- and women-owned developers. These groups face financial and operational challenges that limit their ability to scale housing production and engage in meaningful projects. The proposal addresses these capacity issues by partnering with Housing Forward, TEDC, and PartnerTulsa to attract national developers and build local developer capacity through technical assistance, training, and financial support. By prioritizing minority developers in the Voluntary Vacant Property Acquisition Program, the city will ensure that underrepresented groups are equipped to contribute to the city's housing goals.
2. **Outdated Zoning, Land Use Policies, & Inefficient Procedures:** Tulsa's zoning and permitting processes have long been barriers to affordable housing development. The city's zoning codes limit density and flexibility, particularly for non-traditional housing types such as accessory dwelling units (ADUs), duplexes, and triplexes. The proposal outlines a comprehensive plan to streamline the permitting process, reform zoning policies, and introduce pre-approved plans for affordable housing developments. These efforts will be supported by the Housing Project and Housing Strategy Coordinators, who will ensure that developers can navigate these reformed processes efficiently. Technical assistance from Smart Growth America (SGA) will also be leveraged to identify inefficiencies and recommend best practices for long-term improvements.

- 3. Economic Feasibility & Financial Gaps:** The high cost of developing affordable housing, particularly in underserved areas with deteriorating infrastructure, presents a significant barrier to production. The proposal's Voluntary Vacant Property Acquisition Program will acquire and prepare vacant properties in high-opportunity areas, removing entitlement risk and reducing land costs for developers. Additionally, the Affordable Housing Priority Program will fast-track approvals for projects addressing critical affordable housing needs, providing much-needed financial and administrative support to ensure that resource-constrained projects can succeed. By focusing on reducing infrastructure repair costs and offering financial incentives to developers, this proposal will ensure long-term feasibility for affordable housing projects.

The vision behind this proposal aligns directly with HUD's goals of increasing the supply of affordable housing, advancing racial equity, and promoting sustainable, resilient communities. The City of Tulsa's strategy prioritizes expanding affordable housing options in well-resourced areas, improving access for protected class groups, and creating a more equitable, inclusive housing market. By addressing barriers that perpetuate segregation and limit access to high-opportunity neighborhoods, this proposal will ensure long-term housing stability and economic mobility for Tulsa's most vulnerable populations.

At the end of the grant's period of performance, the City of Tulsa will have built a robust pipeline for affordable housing production, prepared over 40 vacant properties for development, and successfully implemented a range of systemic reforms that will continue to drive housing production and preservation long after the grant's conclusion. The measurable outcomes of this proposal include an increase in affordable housing units, reduced permitting times, expanded developer capacity, and sustained collaboration across key stakeholders. Success will be defined by the ability to not only meet Tulsa's immediate housing needs but also to create a resilient, equitable housing ecosystem that serves as a model for other communities facing similar challenges.

Threshold Requirements and Other Submission Requirements

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

C. Need

C.i. Previous and Ongoing Efforts to Remove Barriers

i.a. Improved laws, regulations, or land use local policies.

Tulsa’s Strategic Approach to Overcoming Local Barriers to Affordable Housing Production and Preservation

The City of Tulsa has demonstrated significant progress in removing the regulatory and systemic barriers that have historically constrained the development and preservation of affordable housing. Leveraging a data-driven approach aligned with HUD’s **Pathways to Removing Obstacles to Housing (PRO Housing)** objectives, Tulsa has prioritized implementing reforms to streamline its zoning, permitting, and land-use policies in order to facilitate the production of affordable housing at scale. These actions are part of an ongoing commitment to align with HUD’s goals of removing barriers, increasing housing production, lowering costs, and addressing long-standing inequities in housing access.

Citywide Housing Zoning Code Amendments: Modernizing Policies to Increase Density and Housing Options

In 2023, Tulsa partnered with AARP to audit its zoning and land use policies. This comprehensive review revealed significant barriers embedded in outdated zoning regulations, such as an over-reliance on single-family zoning, restrictive lot size requirements, and the exclusion of diverse housing types like duplexes, triplexes, and accessory dwelling units (ADUs). These findings led to the creation of the citywide zoning **Housing Feasibility Amendments**, a targeted set of reforms aimed at removing these barriers to affordable housing production and enabling greater housing flexibility.

Barriers Addressed: The zoning codes previously restricted the development of multi-family housing and ADUs, limiting housing diversity, particularly for low- and moderate-income families. High development costs further exacerbated the problem, as minimum lot sizes, setback requirements, and parking mandates inflated per-unit housing costs. Additionally, nearly 65% of Tulsa’s land was zoned exclusively for single-family homes, restricting housing options in many neighborhoods.

The **Housing Feasibility Amendments** are designed to expand housing diversity by simplifying residential uses and building forms, allowing duplexes, multi-unit houses, apartments, and cottage house developments by right in Office and Commercial Districts. ADUs will be easier to

build without additional variances, offering affordable rental opportunities within established neighborhoods, while relaxed site regulations will reduce minimum lot sizes and setbacks, enabling greater housing density in urban areas. Reduced parking requirements near public transit hubs will lower development costs and encourage higher-density, transit-accessible housing.

Timeframe and Impact: These amendments, which are expected to be fully adopted by the end of 2024, will allow Tulsa to better meet its growing housing needs. While specific projections are still being developed, the reforms are expected to facilitate the production of hundreds of new housing units over the next five years, with a particular focus on affordable and workforce housing.

Neighborhood Infill Overlay (NIO): Promoting Density and Preventing Displacement

The **Neighborhood Infill Overlay (NIO)** was introduced in 2021 to target areas that were previously restricted to single-family homes, allowing for the development of higher-density housing such as duplexes, triplexes, and townhomes. The NIO addresses density restrictions and the risk of displacement that had limited housing diversity in key neighborhoods. Originally applied to the areas surrounding downtown Tulsa, the NIO was expanded to the Dawson neighborhood in 2023, offering a framework for increasing housing density while safeguarding long-term residents from displacement.

Barriers Addressed: The NIO directly addresses **density restrictions** by permitting multi-family and mixed-use housing developments in areas that were traditionally limited to single-family housing. It also tackles the **risk of displacement** by including provisions to maintain affordability, ensuring that low-income residents can remain in their communities even as development increases.

Impact: Since its adoption, the NIO has enabled the development of affordable housing units in a variety of historic urban neighborhoods in the city's core. The recent expansion into the Dawson neighborhood is projected to yield several hundred more units by 2025, further contributing to Tulsa's goal of creating diverse, affordable housing options. The NIO supports HUD's emphasis on fostering housing equity and affordability in high-opportunity areas.

Small Area Plans (SAPs): Neighborhood-Specific Revitalization

Tulsa has adopted **Small Area Plans (SAPs)** to address barriers to housing production and preservation at the neighborhood level. These plans align zoning, infrastructure, and land use policies with the unique needs of specific areas, allowing for more targeted and effective housing solutions. One prominent example is the **Kendall-Whittier Small Area Plan**, which has been instrumental in encouraging mixed-use development and increasing housing density in an area with high demand for affordable housing.

Barriers Addressed: The SAPs overcome **zoning restrictions** by establishing policy support for more flexible zoning that accommodate diverse housing types, including duplexes, townhomes, and multi-family units. Additionally, SAPs streamline development by aligning zoning and planning policies, thereby reducing **development complexity** and simplifying the approval process for developers.

Impact: Since the adoption of SAPs, neighborhoods like Kendall-Whittier have seen over 120 new affordable housing units developed in the past two years. The SAP model also incorporates

robust community engagement processes, which have built local support for higher-density developments and helped address **neighborhood opposition** to affordable housing projects.

Streamlined Development Processes: Reducing Costs and Delays

Recognizing that permitting delays and administrative barriers had historically slowed housing production, Tulsa implemented reforms in 2023 to **streamline the development process**. The city introduced revised permitting guidelines specifically for affordable housing developments, aimed at reducing approval times and simplifying requirements for developers.

Barriers Addressed: Lengthy and complex **permitting delays** were a significant barrier to affordable housing production, particularly for smaller developers. By clarifying requirements and providing more predictable timelines, the streamlined process reduces **development uncertainty**, lowering risks and costs for affordable housing projects.

Impact: Since these reforms were implemented, permitting times for affordable housing projects have decreased by 15%, enabling developers to move more quickly from planning to construction. This accelerated timeline has contributed to an increase in the production of affordable units and reduced the overall costs of development.

Unlocking the Full Potential of Recent Reforms

Tulsa's legal, regulatory, and land use reforms have already begun to address the city's most pressing barriers to affordable housing production and preservation. The citywide Housing Feasibility Amendments, Neighborhood Infill Overlay, and Small Area Plans are all essential components of Tulsa's comprehensive housing strategy, each contributing to the creation of diverse, affordable housing options. The **streamlined permitting processes** further enhance these efforts by reducing costs and accelerating project timelines. Despite these significant advancements, challenges remain in fully scaling these initiatives to meet Tulsa's housing needs. The PRO Housing proposal will build on these reforms, providing the necessary funding, coordination, and infrastructure to unlock the full potential of Tulsa's housing ecosystem. Together, these efforts will ensure that Tulsa continues to make substantial progress toward its goal of creating a more equitable, affordable, and resilient housing market for all residents.

C. i.b. Other recent actions taken to overcome barriers to affordable housing

Tulsa is at a pivotal moment in addressing its affordable housing challenges, leveraging a comprehensive ecosystem of initiatives, investments, and partnerships. The **Tulsa Housing Strategy** and the **Path to Home** initiative together provide the city with a robust framework aimed at fostering affordable housing development and preservation. These programs have begun to reshape the landscape, but significant barriers remain that hinder scaling housing production to the level required to meet community needs. The initiatives undertaken so far have laid the groundwork, yet the PRO Housing proposal is necessary to bridge existing gaps and unlock the full potential of these efforts, addressing lingering development barriers, streamlining housing production, and increasing access to affordable housing across Tulsa.

The **2023 Citywide Housing Assessment** identified an urgent need for 12,900 housing units over the next decade, with current construction trends falling far short of this target. To

overcome these barriers, Tulsa has deployed various strategies that include both public and private investments, strategic financial initiatives, and a coordinated effort across city agencies and community partners. However, challenges such as complex permitting processes, outdated infrastructure, increased development costs, and access to land continue to slow progress. **PRO Housing activities will directly address these barriers, furthering the city’s commitment to streamlining affordable housing production** by utilizing both existing and new resources.

Key Examples of Recent Initiatives and Housing Strategies

- 1. Affordable Housing Trust Fund (AHTF):** Established in 2021 with \$4 million in city funds and \$7.5 million in private contributions, the AHTF plays a critical role in expanding access to financing for affordable housing development. By offering no-interest and forgivable loans, as well as grants for housing services such as rental assistance and down payment support, the AHTF has already helped finance the construction of over 80 affordable homes and provided rental assistance to 240 households. The demand for these resources is substantial, with a recent Request for Proposals attracting nearly 1,600 units and over \$31 million in requests. **The AHTF continues to mitigate financial barriers for developers, supporting smaller projects that contribute to the broader housing ecosystem.**
- 2. Green Country Habitat for Humanity and Boomtown Development Company:** These two organizations have collaborated to scale their efforts significantly. Habitat's mission of affordable homeownership has expanded alongside Boomtown’s focus on middle-income rental and for-sale homes. Together, they have grown from producing 20 homes annually to more than 85 homes, with plans for continued increases. **This partnership has been essential in expanding workforce housing, filling the gap for affordable housing in underserved areas.**
- 3. River West and 36N Mixed-Income Communities:** The Tulsa Housing Authority (THA) has led the development of two intentional mixed-income communities, transforming formerly distressed public housing into thriving neighborhoods. **River West** replaced dilapidated public housing units with 435 rental homes, combining subsidized, workforce, and market-rate apartments. Meanwhile, **36N**, Tulsa’s second mixed-income development, is set to produce 545 rental units and 8 single-family homes, alongside investments in community infrastructure. These projects were made possible through HUD’s **Choice Neighborhoods Initiative (CNI)**, Low-Income Housing Tax Credits, and other sources of public and philanthropic funding. **These developments offer a model for future mixed-income housing that promotes social integration and economic resilience.**
- 4. CDFI Friendly Tulsa:** This initiative represents a targeted effort to expand awareness and access to equitable lending practices for Black-owned businesses and housing projects. By working with regional and national community development financial institutions (CDFIs), including the Housing Partnership Network, Tulsa is enhancing access to patient capital for affordable homeownership, rental housing, and small-scale real estate development. **CDFI Friendly Tulsa is a vital mechanism to expand CDFI**

utilization in Tulsa, closing the financing gap for marginalized communities and ensure that all Tulsans have access to fair lending opportunities.

- 5. Rental Assistance and Landlord Incentive Programs:** The City of Tulsa, in collaboration with community organizations such as Restore Hope Ministries and the Global District, has distributed significant rental assistance funds to prevent eviction and stabilize households. More than 95% of rental assistance payments in 2022 and 2023 went to families facing eviction, with 44% of these households being BIPOC and 51% being Hispanic or Latino. **Landlord incentive programs have also been restructured to better align with housing strategies, encouraging landlords to maintain affordable rental units in exchange for financial incentives.**

Infrastructure and Financial Initiatives

The **Improve Our Tulsa (IOT) Bond Package**, approved in 2023, includes \$75 million dedicated to housing development as part of a broader \$104.2 million Tulsa Housing Initiative. This initiative will help alleviate critical development barriers, potentially addressing outdated water, sewer, and transportation infrastructure. By funding infrastructure improvements alongside housing investments, Tulsa is building the capacity to develop more units in areas with high housing demand. **The IOT initiative demonstrates Tulsa’s commitment to addressing housing challenges by ensuring that infrastructure keeps pace with housing production.** Additionally, the **CDBG and HOME-ARP** programs have been instrumental in financing affordable housing projects. These funds have supported everything from rental assistance programs to major housing developments such as River West. Together, these resources address both the production of new housing and the preservation of existing affordable units, making a tangible impact on housing outcomes for low-income residents.

Ongoing Coordination and Systemic Support

A key element of Tulsa’s strategy is enhanced coordination across city departments and with external stakeholders. The creation of the **Department of City Experience** in 2023 has streamlined housing policy coordination, placing planning/zoning, code enforcement, and community development all under one umbrella. This restructuring allows for **more efficient processing of housing development applications** and improved responsiveness to developers’ needs. Meanwhile, the **Mayor/Council 3H Task Force** continues to focus on solutions for homelessness and mental health, driving initiatives that intersect housing, social services, and public health.

Conclusion

Tulsa has made substantial progress in addressing housing barriers, establishing a strong network of public and private partners, financial mechanisms, and strategic investments. These efforts have begun to transform the city’s housing landscape, yet the magnitude of Tulsa’s housing challenges requires continued intervention. The PRO Housing proposal will leverage these achievements to unlock further development by addressing gaps in financing, infrastructure, and coordination that continue to inhibit large-scale housing production. By building on existing

efforts, Tulsa is poised to create a more equitable, inclusive, and resilient housing ecosystem that meets the needs of all residents.

C.ii. Acute Need for Affordable Housing

Acute Need for Affordable Housing in Tulsa

Tulsa faces a significant and growing crisis in affordable housing, underscored by several objective indicators. According to the **2023 Tulsa Citywide Housing Assessment**, Tulsa must add **12,900 housing units** over the next decade to meet current and future demand, particularly for households earning below 100% of the area median income (AMI). Of these, an estimated **6,100 units** are needed for rental housing, with **4,000 units** representing pent-up demand due to production shortfalls in previous years(Tulsa-Citywide-Housing-...)(Tulsa-Housing-Strategy).

1. Affordable Housing Supply Not Keeping Pace Tulsa's housing market is not keeping pace with demand, especially for low-income households. From 2010 to 2022, while the city added 9,800 housing units, the overall production rate still leaves a gap of **12,900 units** to meet equitable growth goals. Moreover, housing permitting rates have historically fallen short of what is required to meet future demand. Tulsa's permitting activity averages just **830 units per year**, well below the necessary **1,290 units annually** needed to match the projected growth(Tulsa-Citywide-Housing-...). This disparity means the city faces a shortfall of nearly 460 units annually, resulting in continued housing insecurity, rising costs, and increased homelessness.

2. Insufficient Affordable Housing and Cost Burden A significant number of Tulsa's low- and moderate-income residents struggle with housing affordability. The assessment shows that **46% of renters** in Tulsa are cost-burdened, meaning they spend more than 30% of their income on housing(Tulsa-Citywide-Housing-...)(Tulsa-Housing-Strategy). Many of these households, especially those earning less than 80% of AMI, are unable to find housing that is both affordable and adequate in condition. Compounding this, the **median home sale price** increased by **40%** from 2018 to 2022, while the median rent rose **22%**, far outpacing wage growth. The **fair market rent** for a two-bedroom apartment now stands at **\$987**, requiring a minimum housing wage of \$19 per hour, which **30% of Tulsa households** do not earn(Tulsa-Housing-Strategy).

3. Widespread Housing Cost Burden and Substandard Housing Nearly half of Tulsa's housing stock is more than 50 years old, and **45% of homes were built before 1970**, exacerbating maintenance issues, safety hazards, and contributing to housing insecurity(Tulsa-Citywide-Housing-...)(Tulsa-Housing-Strategy). Low-income households, especially those earning less than 50% of AMI, often live in substandard housing due to the lack of affordable options. The city's older housing stock is more susceptible to disrepair, and long-term homeowners face challenges in maintaining these properties due to fixed incomes. This situation contributes to further displacement risks as older, naturally affordable housing is lost due to gentrification and redevelopment pressures.

4. Homelessness and Housing Insecurity Tulsa also grapples with a high rate of homelessness, driven largely by the acute lack of affordable housing. The city needs an additional **2,730**

housing units over the next decade specifically to address homelessness and reach **functional zero**. Most of these units are required for households earning less than 30% of AMI, for whom market-rate solutions are not viable. In addition, the need for **permanent supportive housing** is critical, with **1,200 units** required to stabilize the chronically homeless population. Failure to meet this need will result in continued strain on emergency shelters and transitional housing programs, which are already insufficient.

5. Displacement Pressures Tulsa's affordability challenges are compounded by displacement pressures. The city has welcomed more than **850 Afghan refugees** and **1,700 new households** through the **Tulsa Remote** program in recent years. While these new residents contribute positively to Tulsa's economy, they also increase demand for housing, particularly in neighborhoods where naturally occurring affordable housing is already limited. This trend risks displacing long-time residents, particularly in north Tulsa, where median incomes are lower, and housing cost burden is higher than in other parts of the city(Tulsa-Housing-Strategy).

In conclusion, Tulsa faces an acute need for affordable housing across all income levels, but especially for households earning below 100% AMI. The data clearly shows that without a substantial increase in affordable housing production and preservation, the city's housing crisis will only deepen. Significant gaps in housing supply, a large cost-burdened renter population, and escalating home prices and rents underscore the critical need for funding and support to address Tulsa's affordable housing shortage. Addressing these challenges is essential to ensuring equitable growth, reducing homelessness, and fostering long-term economic stability in Tulsa.

C.iii. Key Existing Barriers to Affordable Housing

Through targeted reforms to zoning and land use policies, streamlined permitting processes, and innovative housing initiatives, the City of Tulsa has demonstrated a **commitment to overcoming the local barriers** that have long inhibited the production and preservation of affordable housing. These actions, informed by comprehensive housing assessments and public input, reflect Tulsa's alignment with HUD's priorities to **expand housing production, preserve affordability, and increase access to opportunity for low- and moderate-income families**. The proposed activities outlined in this application build on these foundational reforms and represent a critical next step in achieving **equitable housing outcomes** for all residents of Tulsa. Tulsa's progress to date exemplifies HUD's overarching goal to **empower communities to take concrete steps to remove barriers to affordable housing and increase housing production**.

Key Barrier: Developer Capacity Limitations

Barrier Sub-Components Addressed:

- **Limited Capacity of Local Nonprofit Developers:** Tulsa's affordable housing ecosystem is limited by the small number of nonprofit developers with the experience and capacity to scale housing production.

- **Underrepresentation of Minority Developers:** Minority- and women-owned developers face significant financial and operational challenges, limiting their ability to participate in housing development projects.
- **Challenges in Attracting National Developers:** Decades of challenges in attracting national developers to Tulsa's affordable housing market have exacerbated production limitations. This is primarily due to financial barriers and limited incentives for developers to enter the local market.

Program Components:

- **Housing Forward Partnership:** This partnership will bring in expertise to attract national developers and increase capacity in Tulsa. Housing Forward will also provide guidance on removing procedural and financial barriers that hinder national developers from participating in local projects.
- **TEDC and PartnerTulsa Capacity Building Programs:** These programs will focus on providing technical assistance, training, and financial support to minority- and women-owned developers, empowering them to overcome financial constraints and operational challenges.
- **Voluntary Vacant Property Acquisition Program:** Through collaboration with TEDC and PartnerTulsa, the city will prioritize minority developers in the redevelopment of vacant properties, ensuring that underrepresented groups play a key role in transforming blighted areas into affordable housing.

HUD Alignment:

These activities align with HUD's strategic goals of increasing the supply of affordable housing (Goal 2A) and promoting racial equity and economic inclusion (Goal 1A). By addressing the underrepresentation of minority developers and the capacity limitations of local nonprofit developers, these initiatives will increase housing production while advancing equity in the development process. The focus on local capacity building and national developer attraction aligns with HUD's emphasis on leveraging innovative solutions and fostering collaboration to increase housing production and preservation.

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

Barrier Sub-Components Addressed:

- Outdated Zoning Codes and Land Use Restrictions:** Tulsa's zoning regulations limit density, prohibit the development of missing middle housing, and slow down housing production, especially in high-opportunity areas.
- Lengthy Permitting and Approval Processes:** Inefficiencies in the permitting and approval process create delays for developers, increasing the time and cost associated with affordable housing production.
- Limited Flexibility for Non-Traditional Housing Types:** Current zoning policies make it difficult to implement innovative housing solutions such as accessory dwelling units (ADUs), duplexes, and triplexes in various neighborhoods.

Program Components:

- **Housing Strategy Coordinator:** This role ensures that housing initiatives align with broader city strategies, providing oversight and coordination of policy reforms, zoning updates, and development plans to promote equitable housing solutions. The coordinator works across departments and with external partners to ensure that housing projects meet strategic goals, reducing barriers to affordable housing and ensuring efficient, inclusive development efforts.
- **Housing Project Coordinator:** This position will actively facilitate the development process by guiding developers through reformed zoning, permitting, and regulatory procedures. By serving as a single point of contact, the coordinator will streamline communications between city departments, helping developers navigate the complexities of affordable housing projects. The role will focus on reducing delays, ensuring compliance with city regulations, and accelerating project timelines from initial concept through completion. This support will lower the time and cost burdens that traditionally hinder affordable housing production, fostering faster and more efficient development.
- **System Coordination and Planning Activities:** With sufficient capacity to receive and implement Technical Assistance and system-level improvements via the two PRO Housing staff, Smart Growth America (SGA) will work with our new team on to identify gaps and inefficiencies and opportunities for improvement by providing **Technical Assistance** to plan and implement best practices in housing suitability mapping, comprehensive zoning code assessment, coordinated systems for stakeholder engagement, streamlined permitting and review processes, housing incentive program review, and economic impact analysis. This will result in a new planning and oversight structures including but not limited to an advisory committee of key stakeholders that will monitor and drive the implementation of the 33 Tulsa Housing Strategy priority activities, and maintain coordination and efficiency mechanisms that benefit the housing ecosystem long term.
- **Policy Reform Activities:** This initiative will streamline permitting processes and reform zoning codes to allow higher density and missing middle housing types, such as ADUs, duplexes, and triplexes. Zoning reforms will prioritize affordable housing production in well-resourced areas and make it easier to develop in high-opportunity zones.
- **Pre-Approved Plans Program:** By introducing pre-approved architectural plans for affordable housing developments, this program will expedite the design and approval process for non-profit developers and small-scale builders, particularly for ADUs, duplexes, and triplexes.

HUD Alignment:

These activities align with HUD’s goals of reducing barriers to affordable housing production and preservation by addressing inefficiencies in zoning and permitting (Goal 2A). Streamlining processes, updating codes to allow higher density, and reducing approval times will expand affordable housing opportunities in well-resourced areas. This reform supports HUD’s objective to locate affordable housing near transit and services, increase resilience, and promote sustainable, equitable development.

Key Barrier: Economic Feasibility & Financial Gaps

Barrier Sub-Components Addressed:

- a. **Deteriorating and Inadequate Infrastructure:** In many underserved neighborhoods, outdated infrastructure (sewer, water, roads) makes it difficult to develop new housing or rehabilitate existing properties. Over half of all housing in Tulsa was built prior to 1970.
- b. **Lack of Financial Resources for Development:** The high cost of developing affordable housing, including infrastructure repairs, often creates a funding gap that makes projects financially unfeasible without significant subsidies. The complexities of obtaining affordable housing financing products such as Tax Credits are often deterrents to developers as well.
- c. **High Land Acquisition Costs:** The cost of land, particularly in well-resourced areas, poses a significant barrier to developing affordable housing, further exacerbating supply shortages.

Program Components:

- **Voluntary Vacant Property Acquisition Program:** This program will acquire and prepare vacant properties in high-opportunity areas, removing entitlement risk and lowering land costs for developers. By addressing legal, structural and infrastructure barriers and deficiencies, the program will prepare these sites for affordable housing development using PRO Housing grant funds to ensure homes can be affordable at or below the 100% AMI level for homeownership and are guaranteed to be sold to low to moderate income homebuyers from underserved communities.
- **Affordable Housing Priority Program:** This initiative will fast-track approvals for developments addressing critical affordable housing needs, providing affordable housing financing technical assistance in partnership with Housing Forward, and streamlining the permitting process for developers. This ensures that resource-constrained projects receive the necessary subsidies and administrative support.

HUD Alignment:

These activities align with HUD's goals of increasing the supply of affordable housing (Goal 2A) by addressing infrastructure barriers that limit development and preservation. The focus on repairing and upgrading infrastructure, combined with financial incentives and fast-tracking approvals, will ensure that projects are completed in areas with high need and opportunity. By preparing sites in high-opportunity areas for development, this program supports HUD's commitment to expanding access to well-resourced areas, increasing housing choice, and ensuring long-term affordability.

This PRO Housing proposal will use funding to catalyze major systemic improvements that will be sustained as permanent fixtures in the Housing Ecosystem. After engaging with various partners and stakeholders in preparation for this proposal, the City of Tulsa determined that there is an urgent need to implement several specific activities that fall under three of the Tulsa Housing Strategy's four core areas of focus. The strategy includes priority actions, which need to be implemented in the next three years to support housing development, and supportive actions that are needed to foster long-term success. These include Strategies 1: Fund the gap for new development preservation, rehab, & renovation, Strategy 2: Facilitate housing development and redevelopment, and 4. Advocate, align policy, and make process improvements. PRO Housing funds will unlock essential activities that will not only coordinate Tulsa's housing pipeline in a

more city-wide and efficient way, but it will allow key stakeholders to prepare for an unprecedented infusion of \$75 million in bond funding that was voted on in 2022 to housing funds that will be made available starting in 2026. The **Improve Our Tulsa** plan allocates **\$95 million** to housing and neighborhoods, with \$75 million dedicated to housing initiatives. This is combined with funds from several sources to create the **\$104.2 million Tulsa Housing Initiative**.

Need: ii. Acute Need for Affordable Housing

Tulsa faces a significant and growing crisis in affordable housing, underscored by several objective indicators. According to the **2023 Tulsa Citywide Housing Assessment**, Tulsa must add **12,900 housing units** over the next decade to meet current and future demand, particularly for households earning below 100% of the area median income (AMI). Of these, an estimated **6,100 units** are needed for rental housing, with **4,000 units** representing pent-up demand due to production shortfalls in previous years.

1. Affordable Housing Supply Not Keeping Pace Tulsa's housing market is not keeping pace with demand, especially for low-income households. From 2010 to 2022, while the city added 9,800 housing units, the overall production rate still leaves a gap of **12,900 units** to meet equitable growth goals. Moreover, housing permitting rates have historically fallen short of what is required to meet future demand. Tulsa's permitting activity averages just **830 units per year**, well below the necessary **1,290 units annually** needed to match the projected growth (Tulsa-Citywide-Housing-...). This disparity means the city faces a shortfall of nearly 460 units annually, resulting in continued housing insecurity, rising costs, and increased homelessness.

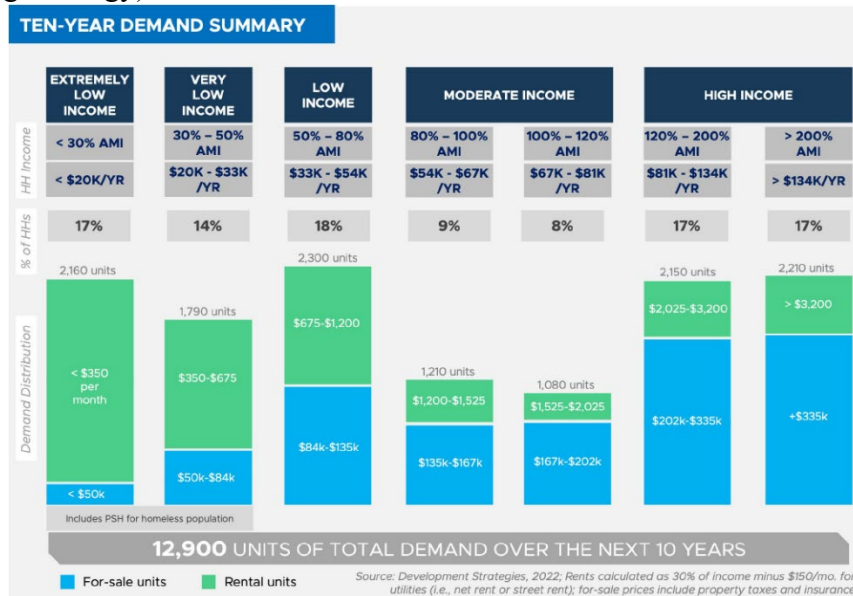
2. Insufficient Affordable Housing and Cost Burden A significant number of Tulsa's low- and moderate-income residents struggle with housing affordability. The assessment shows that **46% of renters** in Tulsa are cost-burdened, meaning they spend more than 30% of their income on housing. Many of these households, especially those earning less than 80% of AMI, are unable to find housing that is both affordable and adequate in condition. Compounding this, the **median home sale price** increased by **40%** from 2018 to 2022, while the median rent rose **22%**, far outpacing wage growth. The **fair market rent** for a two-bedroom apartment now stands at **\$987**, requiring a minimum housing wage of \$19 per hour, which **30% of Tulsa households** do not earn.

3. Widespread Housing Cost Burden and Substandard Housing Nearly half of Tulsa's housing stock is more than 50 years old, and **45% of homes were built before 1970**, exacerbating maintenance issues, safety hazards, and contributing to housing insecurity. Low-income households, especially those earning less than 50% of AMI, often live in substandard housing due to the lack of affordable options. The city's older housing stock is more susceptible to disrepair, and long-term homeowners face challenges in maintaining these properties due to fixed incomes. This situation contributes to further displacement risks as older, naturally affordable housing is lost due to gentrification and redevelopment pressures.

4. Homelessness and Housing Insecurity Tulsa also grapples with a high rate of homelessness, driven largely by the acute lack of affordable housing. The city needs an additional **2,730 housing units** over the next decade specifically to address homelessness and reach **functional**

zero (Tulsa-Citywide-Housing-...). Most of these units are required for households earning less than 30% of AMI, for whom market-rate solutions are not viable. In addition, the need for **permanent supportive housing** is critical, with **1,200 units** required to stabilize the chronically homeless population (Tulsa-Citywide-Housing-...). Failure to meet this need will result in continued strain on emergency shelters and transitional housing programs, which are already insufficient.

5. Displacement Pressures Tulsa’s affordability challenges are compounded by displacement pressures. The city has welcomed more than **850 Afghan refugees** and **1,700 new households** through the **Tulsa Remote** program in recent years (Tulsa-Citywide-Housing-...). While these new residents contribute positively to Tulsa’s economy, they also increase demand for housing, particularly in neighborhoods where naturally occurring affordable housing is already limited. This trend risks displacing long-time residents, particularly in north Tulsa, where median incomes are lower, and housing cost burden is higher than in other parts of the city (Tulsa-Housing-Strategy).



Conclusion

In conclusion, Tulsa faces an acute need for affordable housing across all income levels, but especially for households earning below 100% AMI. The data clearly shows that without a substantial increase in affordable housing production and preservation, the city’s housing crisis will only deepen. Significant gaps in housing supply, a large cost-burdened renter population, and escalating home prices and rents underscore the critical need for funding and support to address Tulsa’s affordable housing shortage. Addressing these challenges is essential to ensuring equitable growth, reducing homelessness, and fostering long-term economic stability in Tulsa.

Need iii. Key barriers needing to be addressed to produce and preserve more affordable housing.

Key Barrier: Developer Capacity Limitations

Barrier Sub-Components Addressed:

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

Program Components:

- **Housing Forward Partnership:** This partnership will bring in expertise to attract national developers and increase capacity in Tulsa. Housing Forward will also provide guidance on removing procedural and financial barriers that hinder national developers from participating in local projects.
- **TEDC and PartnerTulsa Capacity Building Programs:** These programs will focus on providing technical assistance, training, and financial support to minority- and women-owned developers, empowering them to overcome financial constraints and operational challenges.
- **Voluntary Vacant Property Acquisition Program:** Through collaboration with TEDC and PartnerTulsa, the city will prioritize minority developers in the redevelopment of vacant properties, ensuring that underrepresented groups play a key role in transforming blighted areas into affordable housing.

HUD Alignment:

These activities align with HUD's strategic goals of increasing the supply of affordable housing (Goal 2A) and promoting racial equity and economic inclusion (Goal 1A). By addressing the underrepresentation of minority developers and the capacity limitations of local nonprofit developers, these initiatives will increase housing production while advancing equity in the development process. The focus on local capacity building and national developer attraction aligns with HUD's emphasis on leveraging innovative solutions and fostering collaboration to increase housing production and preservation.

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

Barrier Sub-Components Addressed:

- a. **Outdated Zoning Codes and Land Use Restrictions:** Tulsa's zoning regulations limit density, prohibit the development of missing middle housing, and slow down housing production, especially in high-opportunity areas.
- b. **Lengthy Permitting and Approval Processes:** Inefficiencies in the permitting and approval process create delays for developers, increasing the time and cost associated with affordable housing production.
- c. **Limited Flexibility for Non-Traditional Housing Types:** Current zoning policies make it difficult to implement innovative housing solutions such as accessory dwelling units (ADUs), duplexes, and triplexes in various neighborhoods.

Program Components:

- **Housing Strategy Coordinator:** This role ensures that housing initiatives align with broader city strategies, providing oversight and coordination of policy reforms, zoning updates, and development plans to promote equitable housing solutions. The coordinator works across departments and with external partners to ensure that housing projects meet strategic goals, reducing barriers to affordable housing and ensuring efficient, inclusive development efforts.
- **Housing Project Coordinator:** This position will actively facilitate the development process by guiding developers through reformed zoning, permitting, and regulatory procedures. By serving as a single point of contact, the coordinator will streamline communications between city departments, helping developers navigate the complexities of affordable housing projects. The role will focus on reducing delays, ensuring compliance with city regulations, and accelerating project timelines from initial concept through completion. This support will lower the time and cost burdens that traditionally hinder affordable housing production, fostering faster and more efficient development.
- **System Coordination and Planning Activities:** With sufficient capacity to receive and implement Technical Assistance and system-level improvements via the two PRO Housing staff, Smart Growth America (SGA) will work with our new team on to identify gaps and inefficiencies and opportunities for improvement by providing **Technical Assistance** to plan and implement best practices in housing suitability mapping, comprehensive zoning code assessment, coordinated systems for stakeholder engagement, streamlined permitting and review processes, housing incentive program review, and economic impact analysis. This will result in a new planning and oversight structures including but not limited to an advisory committee of key stakeholders that will monitor and drive the implementation of the 33 Tulsa Housing Strategy priority activities, and maintain coordination and efficiency mechanisms that benefit the housing ecosystem long term.
- **Policy Reform Activities:** This initiative will streamline permitting processes and reform zoning codes to allow higher density and missing middle housing types, such as ADUs, duplexes, and triplexes. Zoning reforms will prioritize affordable housing production in well-resourced areas and make it easier to develop in high-opportunity zones.
- **Pre-Approved Plans Program:** By introducing pre-approved architectural plans for affordable housing developments, this program will expedite the design and approval process for non-profit developers and small-scale builders, particularly for ADUs, duplexes, and triplexes.

HUD Alignment:

These activities align with HUD's goals of reducing barriers to affordable housing production and preservation by addressing inefficiencies in zoning and permitting (Goal 2A). Streamlining processes, updating codes to allow higher density, and reducing approval times will expand affordable housing opportunities in well-resourced areas. This reform supports HUD's objective to locate affordable housing near transit and services, increase resilience, and promote sustainable, equitable development.

Key Barrier: Economic Feasibility & Financial Gaps

Barrier Sub-Components Addressed:

- a. **Deteriorating and Inadequate Infrastructure:** In many underserved neighborhoods, outdated infrastructure (sewer, water, roads) makes it difficult to develop new housing or rehabilitate existing properties. Over half of all housing in Tulsa was built prior to 1970.
- b. **Lack of Financial Resources for Development:** The high cost of developing affordable housing, including infrastructure repairs, often creates a funding gap that makes projects financially unfeasible without significant subsidies. The complexities of obtaining affordable housing financing products such as Tax Credits are often deterrents to developers as well.
- c. **High Land Acquisition Costs:** The cost of land, particularly in well-resourced areas, poses a significant barrier to developing affordable housing, further exacerbating supply shortages.

Program Components:

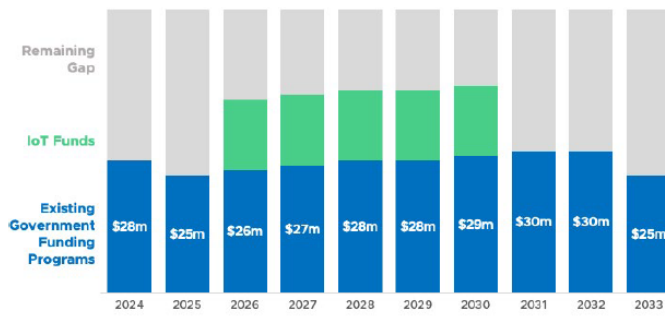
- **Voluntary Vacant Property Acquisition Program:** This program will acquire and prepare vacant properties in high-opportunity areas, removing entitlement risk and lowering land costs for developers. By addressing legal, structural and infrastructure barriers and deficiencies, the program will prepare these sites for affordable housing development using PRO Housing grant funds to ensure homes can be affordable at or below the 100% AMI level for homeownership and are guaranteed to be sold to low to moderate income homebuyers from underserved communities.
- **Affordable Housing Priority Program:** This initiative will fast-track approvals for developments addressing critical affordable housing needs, providing affordable housing financing technical assistance in partnership with Housing Forward, and streamlining the permitting process for developers. This ensures that resource-constrained projects receive the necessary subsidies and administrative support.

HUD Alignment:

These activities align with HUD's goals of increasing the supply of affordable housing (Goal 2A) by addressing infrastructure barriers that limit development and preservation. The focus on repairing and upgrading infrastructure, combined with financial incentives and fast-tracking approvals, will ensure that projects are completed in areas with high need and opportunity. By preparing sites in high-opportunity areas for development, this program supports HUD's commitment to expanding access to well-resourced areas, increasing housing choice, and ensuring long-term affordability.

- c. **Underrepresentation of Minority Developers:** Minority- and women-owned developers often face financial and capacity challenges, limiting their ability to participate in housing development projects.

INVESTMENT: HOW COULD THIS LOOK OVER THE NEXT 10 YEARS?



The Housing Assessment was released before the announcement that \$75 million in new funding would be included for housing in the Improve our Tulsa bond package, and additional public resources have been announced since then, including HOME-ARPA, ARPA, and other dollars. Thus, the projections have been revised and should be evaluated annually. The graphic at the top of the page demonstrates our best understanding of current and future resources, as well as the remaining gap.³

Housing Ecosystem Analysis

The housing ecosystem analysis focused on identifying barriers and other challenges within the housing ecosystem that limit the community’s ability to meet housing needs. The purpose of this analysis is to help focus the strategy on programs, policies, and funding that directly address ecosystem shortcomings.

Most of the individuals interviewed said that the shortage of housing units is the key limitation of the community’s ability to make progress on other housing issues. Five additional themes were reported by most ecosystem participants:

1. There is a need for more gap funding of all types (incentives, low-interest/favorable loans, grants, equity options, etc.).
2. There is a need for a more clear and consistent development process.
3. There is a need for strengthening the workforce pipeline and capacity building within the housing ecosystem, particularly for minority contractors and developers.
4. There are challenges around zoning—particularly re-zoning—which creates uncertainty around the feasibility of projects and deters developers from certain projects.
5. There is a need for broader awareness of Tulsa’s housing needs in order to build stronger community and governing body support for citywide policy and neighborhood-level housing development.

D. Soundness of Approach

D.i. The Vision for PRO Housing Funds

i. What is your vision? (15 points)



Tulsa’s housing ecosystem has laid a solid foundation for addressing the city's unmet housing needs, yet remains hindered by several systemic barriers that limit affordable housing production and preservation. Over the past five years, Tulsa has developed key strategies through collaborative efforts from public agencies, nonprofit organizations, developers, and advocacy groups, all dedicated to addressing housing challenges for residents of all income levels, especially low- and moderate-income individuals and protected classes under the Fair Housing Act. Despite these efforts, a lack of cohesive, city-wide coordination has impeded progress in removing entrenched barriers, such as outdated zoning regulations, capacity limitations of developers, and financial gaps in housing production. This **PRO Housing proposal** presents a critical opportunity to **unlock systemic improvements** that will build on these existing efforts, creating sustainable mechanisms for streamlining development processes, expanding developer capacity, and implementing essential policy reforms. This proposal represents Tulsa’s commitment to fostering long-term growth in affordable housing production while addressing the root causes that have long hindered equitable access to quality housing for all residents.

The City of Tulsa’s vision for addressing the critical barriers to affordable housing production and preservation hinges on aligning the city’s current resources, strategic priorities, and community assets with the necessary systemic improvements to unlock the housing ecosystem’s full potential. Leveraging the momentum of the City’s recent housing strategies, including the **2020-2024 Consolidated Plan**, **2023 Tulsa Housing Strategy**, and **the PLANiTULSA Comprehensive Plan**, our proposal seeks to address persistent gaps in affordable housing availability. Through this proposal, we intend to remove the regulatory, procedural, and financial barriers that have historically slowed housing development while ensuring that the housing pipeline grows sustainably to meet current and future demand.

Tulsa’s proposed activities are targeted to overcome three core barriers: developer capacity limitations, outdated zoning and land use policies, and financial gaps that make affordable housing production economically infeasible. These barriers have been identified through extensive stakeholder engagement, market analysis, and lessons learned from previous initiatives. The key components of this proposal—capacity building, system coordination, policy reform, and streamlined development processes—are designed to maximize the immediate impact on housing production while laying the foundation for long-term growth.



The first set of activities focuses on addressing *developer capacity limitations* by providing targeted support to minority- and women-owned developers and nonprofit housing organizations that have historically faced barriers to scaling their operations. Through partnerships with organizations such as TEDC and PartnerTulsa, we will provide technical assistance, training, and financial support to empower these developers to participate more fully in Tulsa’s housing ecosystem. Additionally, the *Housing Forward Partnership* will bring expertise to attract national developers to Tulsa, which has been a long-standing challenge due to financial and operational barriers in the local housing market. By engaging these local and national developers, we will increase the pipeline of housing projects that can address Tulsa’s unmet affordable housing needs.

Outdated zoning, land use policies, and inefficient procedures present the second major barrier to housing production in Tulsa. The City’s zoning regulations currently limit density, prevent the development of missing middle housing, and slow down approvals for new projects. The proposed *Housing Strategy Coordinator* will provide oversight and ensure that policy reforms are aligned with the City’s strategic goals, including updating zoning codes to allow for more flexible, higher-density housing solutions. These efforts will be complemented by the *Housing Project Coordinator*, who will guide developers through newly reformed permitting processes, ensuring that projects move quickly from concept to completion. In collaboration with Smart Growth America, we will also implement system-level improvements, such as a comprehensive zoning code assessment and a streamlined permitting process, to reduce approval times and remove regulatory bottlenecks that have traditionally hindered affordable housing projects.

Finally, the *economic feasibility and financial gaps* related to affordable housing development represent a significant obstacle in Tulsa’s housing ecosystem. High land acquisition costs, deteriorating infrastructure, and a lack of financing options for affordable housing have created insurmountable hurdles for many developers. The *Voluntary Vacant Property Acquisition Program* will address this by acquiring and preparing vacant properties in high-opportunity areas for development, thus lowering land costs and eliminating entitlement risks for developers. By rehabilitating or redeveloping these properties into affordable housing, the program will provide critical support for low- and moderate-income families and individuals. Additionally, the *Affordable Housing Priority Program* will streamline approvals and fast-track developments that

address critical housing needs, ensuring that resource-constrained projects receive the necessary administrative and financial support. This will be complemented by technical assistance from Housing Forward, helping developers navigate affordable housing financing products, such as Tax Credits, that can close funding gaps and make projects viable.

Each of these activities directly addresses one or more national objectives under the Housing and Community Development Act of 1974, particularly by benefiting low- and moderate-income persons and preventing or eliminating slums and blight. Our proposal aligns with HUD's strategic goals of increasing the supply of affordable housing, promoting racial equity and economic inclusion, and advancing sustainable communities through smart growth initiatives and resilience planning.

Through these coordinated efforts, Tulsa's proposal is expected to deliver significant outcomes within the first two years of the grant period. We anticipate the completion of 40 new and rehabilitated affordable housing units through the *Voluntary Vacant Property Acquisition Program*, with long-term potential to scale this model for additional housing production. The capacity-building programs will enable local minority developers to take on larger, more complex projects, while the policy reforms and streamlined processes will make Tulsa more attractive to national developers. Together, these activities will create a robust, sustainable housing pipeline that addresses current needs while preparing the City for future growth.

This proposal will also ensure that new housing opportunities are created without inviting displacement. By prioritizing community engagement and voluntary property acquisition, the City will ensure that property owners are treated fairly and equitably, preventing the kind of forced displacement that has plagued past redevelopment efforts. Additionally, by focusing on expanding affordable housing in well-resourced areas, the proposal will help deconcentrate poverty, increase housing choice, and promote racial and economic integration across Tulsa's neighborhoods.

In sum, Tulsa's vision for its PRO Housing proposal is to establish a housing ecosystem where all stakeholders—from developers to residents—are empowered to contribute to the production and preservation of affordable housing. By addressing the key barriers of developer capacity, outdated policies, and financial gaps, this proposal will unlock the City's full potential to meet the housing needs of its most vulnerable populations, while laying the foundation for equitable, sustainable growth in the future.

Comparison to Similar Efforts and Lessons Learned

The City of Tulsa's PRO Housing proposal incorporates key lessons learned from past local initiatives and successful national programs, leveraging both previous experiences and external resources to ensure long-term, scalable success. This proposal integrates new and innovative approaches, with significant technical assistance and system-level coordination improvements

driven by *Smart Growth America (SGA)*, while also complementing ongoing local efforts to produce and preserve affordable housing.

Local Lessons Learned and Adjustments for Success

Voluntary Vacant Property Acquisition and Development Program

Tulsa’s experience with property acquisition dates back to efforts initiated over 50 years ago during the *Urban Renewal Era*, where properties were acquired through **eminent domain** to address blight and spur redevelopment. However, while this approach successfully accumulated land for redevelopment, it lacked an explicit focus on affordable housing production or ensuring equitable outcomes, particularly for communities that had been historically marginalized. The current program managed by *PartnerTulsa* has successfully repurposed these legacy properties, resulting in the sale of 23 parcels that will support the development of 167 new housing units, with seven more parcels in the process of being sold. While this has contributed to housing production, it hasn’t focused on three critical HUD goals: **expanding affordable housing in a manner that promotes desegregation, expanding housing in well-resourced areas for protected class groups, and deconcentrating affordable housing to increase housing choice**. The *Voluntary Vacant Property Acquisition Program* proposed in this PRO Housing application builds on lessons from past approaches by shifting away from eminent domain and adopting a **community-driven, voluntary acquisition model**. This ensures that property owners are fairly compensated and not displaced. Our program prioritizes acquiring properties in **high-opportunity areas**, as defined by HUD, with an explicit focus on **increasing housing choice** and **expanding access to well-resourced areas**. This equity-driven model aligns with HUD’s affirmative fair housing objectives and avoids the inequitable impacts of past practices.

Path to Home Initiative and 3H Task Force

The *Path to Home Initiative* and the *3H Task Force* were well-intentioned efforts that sought to address housing affordability and homelessness in Tulsa. However, these efforts are hindered by fragmented coordination among various city departments, including *Development Services* and *Tulsa Planning Office*. The absence of dedicated coordination and interdepartmental collaboration has led to duplication of efforts and a slower implementation process. Building on this experience, the **Tulsa Housing Strategy (2024)** recommended the creation of two key staff positions: the *Housing Strategy Coordinator* and the *Housing Project Coordinator*. The PRO Housing proposal directly implements these roles, ensuring that future efforts are **centrally coordinated and streamlined across departments**. These new staff members will work closely with the *Housing Manager* to provide oversight and collaboration across city agencies, ensuring that all programs align with HUD’s priorities for **streamlined, equitable, and coordinated housing development**.

Successes from Other Cities and How Tulsa Will Emulate Them

Pre-Approved Plans Program

Pre-approved plans programs have been highly successful in cities like **Kalamazoo, MI** and **South Bend, IN**. Kalamazoo’s program, implemented in 2022, allowed for the development of 48 homes in its first year, helping 106 residents buy or significantly improve their homes. Similarly, South Bend’s program provided critical support to small-scale developers—many of

whom are women and people of color—working in neighborhoods with a history of disinvestment.

Tulsa’s *Pre-Approved Plans Program* will emulate these successes by introducing pre-approved building plans that fit the unique context of Tulsa’s neighborhoods, with a focus on **missing middle housing** such as ADUs, duplexes, and triplexes. These plans will lower design costs and reduce approval times, making it easier for small-scale developers and nonprofits to build affordable homes. The program will support **infill development in high-opportunity areas** and align with HUD’s goal of **expanding affordable housing in well-resourced areas**.

Greenville Housing Fund’s Land Reserve Bank Program

In **Greenville, SC**, the *Greenville Housing Fund (GHF)* has used its *Land Reserve Bank Program* to acquire parcels in rapidly appreciating neighborhoods and hold them for future affordable housing development. This ensures that land remains available for community-centric development goals and prevents displacement of vulnerable populations.

The *Voluntary Vacant Property Acquisition Program* in Tulsa will similarly focus on acquiring and holding vacant properties for development, ensuring that these properties are used for **affordable housing** that promotes **deconcentration of poverty** and **housing choice** in well-resourced areas. The voluntary nature of the program ensures that property owners are compensated fairly and that the development aligns with both community and HUD goals.

Affordable Housing Priority Program

Cities like **Fort Worth, TX** and **Austin, TX** have successfully implemented fast-track housing approval programs to expedite the development of affordable housing. Fort Worth’s *Expedited Plan Review Team* and Austin’s *Fast Track Process* allowed developers to begin site preparation while construction approvals were still pending, reducing overall project timelines.

Tulsa’s *Affordable Housing Priority Program*, while informed by these models, represents an innovative approach that has not yet been fully tested locally. By offering **pre-development consultations, fast-track approval, and coordinated project review** across departments, the program will help developers navigate the city’s permitting and regulatory process more efficiently, reducing delays and increasing the production of affordable units. This program will also benefit from the comprehensive **zoning assessments and permitting process reviews** that will be conducted with technical assistance from *Smart Growth America (SGA)*, ensuring that the fast-track process is built on a foundation of best practices.

Leveraging External Expertise for Systemic Improvements

A critical element of this proposal is the **leveraging of technical assistance from Smart Growth America (SGA)**. SGA’s work will help drive system-wide improvements, including:

1. **Zoning Code Assessments** to identify barriers to housing development and promote regulatory reforms that streamline the process.
2. **Spatial Analysis** to evaluate current and future housing density, ensuring that new developments align with HUD’s goals for equitable access to resources and transportation.
3. **Comprehensive Systems Analysis of the Plan Review and Permitting Process** to identify inefficiencies and streamline approvals, particularly for affordable housing projects.

4. **Community Engagement Evaluation** to ensure robust, inclusive stakeholder involvement in housing decisions.
5. **Housing Incentive Program Review** to assess existing incentive structures and recommend changes that better support affordable housing development.
6. **Economic Impact Analysis** to measure the fiscal implications of proposed housing strategies and ensure long-term sustainability.

SGA has led similar system and policy evaluations across the country, including major initiatives in **Vermont** and the development of HUD's **Thriving Communities Program**. Their expertise in assessing zoning barriers, conducting fiscal impact analyses, and advising municipalities on smart growth strategies ensures that Tulsa's proposal is **backed by national best practices** and will be implemented efficiently.

Innovative Nature of the Proposal

The **Affordable Housing Priority Program** represents a unique, innovative approach that Tulsa has not yet tested. By combining lessons learned from Fort Worth and Austin's fast-track approval processes with SGA's comprehensive system assessments, this program will address one of the most significant barriers to affordable housing development in Tulsa: the lengthy, complicated permitting process. Additionally, the program will integrate technical assistance from *Housing Forward* to support minority, female, and veteran-owned developers, providing the necessary capacity-building resources to ensure that diverse developers have the tools to participate in Tulsa's housing development ecosystem.

Complementary Leverage of Existing Resources

Tulsa's proposal will leverage existing city and partner resources to complement the activities proposed under the PRO Housing grant. These include:

1. The **existing properties managed by *PartnerTulsa*** that were acquired over the last 15 years, which will continue to be sold and redeveloped as affordable housing.
2. The **ongoing efforts of the Tulsa Development Authority**, which will align its asset management expertise with the proposed vacant property acquisition program.
3. The **citywide assessments** to be conducted by *SGA*, which will leverage existing data and resources from the **Tulsa Planning Office** and **Department of Development Services** to streamline housing development processes and zoning regulations.
4. The **technical expertise** of *Housing Forward*, which will be leveraged to build developer capacity and implement long-term strategies for affordable housing production.

Tulsa's PRO Housing proposal is deeply rooted in the lessons learned from previous efforts, both locally and nationally. By shifting away from inequitable practices like eminent domain, leveraging national best practices through SGA's technical assistance, and addressing key systemic barriers, this proposal is poised to transform Tulsa's housing ecosystem. The innovative nature of the *Affordable Housing Priority Program* and the integration of coordinated, cross-departmental strategies will ensure that Tulsa meets HUD's priorities for **equity, streamlined processes, and expanded access to affordable housing**.

Alignment with and Advancement of Existing Planning Initiatives

The City of Tulsa’s PRO Housing proposal directly advances and complements existing planning initiatives outlined in the **2020-2024 Consolidated Plan** and the **Tulsa Housing Strategy (2024)**, as well as ongoing efforts such as the *Path to Home Initiative* and the city's broader development strategy. This proposal builds on existing efforts to streamline housing development, align land use regulations, improve access to key services, and increase community resilience through strategic housing and infrastructure investments. The proposed activities also account for Tulsa's **expected population growth** and evolving housing needs over the next decade.

Addressing Housing Gaps and Expanding Affordable Housing

The *Tulsa Housing Strategy* identified an unmet housing demand of **13,000 units** over the next 10 years, particularly for affordable and workforce housing. The PRO Housing proposal is designed to address this gap through activities such as the **Voluntary Vacant Property Acquisition Program** and the **Affordable Housing Priority Program**, both of which align with the *Tulsa Housing Strategy*'s recommendations to expand affordable housing opportunities in **high-opportunity areas**. The acquisition program, in particular, is tailored to bring **development-ready sites** to the market by offering **subsidies to developers through a redevelopment fund**, ensuring that the **development funding gap** is closed, and incentivizing the construction of affordable units.

These programs are also strategically linked to **existing efforts by PartnerTulsa** to repurpose legacy properties acquired through urban renewal efforts. By providing subsidies to developers, the proposal not only accelerates housing production but ensures that housing is **affordable for LMI households** and located in areas that promote **economic mobility and access to services**.

Advancing Key Land Use and Zoning Reforms

Zoning Code and Land Use Simplification

The proposal’s focus on **zoning code updates** is informed by ongoing work from the *Tulsa Planning Office* and the *Department of Development Services*, which are working to implement zoning reforms aimed at reducing barriers to affordable housing. Tulsa is already in the process of adopting the **Housing Feasibility Amendments** and expanding the **Neighborhood Infill Overlay**, which allows for increased density and the development of missing middle housing types such as duplexes, triplexes, and ADUs. The **Voluntary Vacant Property Acquisition Program** will build on these amendments by targeting properties in areas where zoning updates have made affordable housing development more feasible, ensuring that these properties are aligned with the City's broader land use goals.

Through the **Smart Growth America (SGA) technical assistance**, the proposal will include comprehensive **zoning assessments** that identify opportunities to further simplify land use regulations, expedite the permitting process, and remove barriers that currently hinder affordable housing development. This includes conducting a **Comprehensive Systems Analysis of the Plan Review and Permitting Process**, which will help streamline project approvals and reduce bottlenecks that developers currently face. These system improvements will lead to faster, more efficient development while ensuring that affordable housing is built where it is most needed.

Supporting Transportation and Access to Community Assets

Regional and Local Transportation Planning

The proposal is closely aligned with *Tulsa's Regional Transit Plan* and the expansion of the *Bus Rapid Transit (BRT) Routes*, which have been prioritized as key transit corridors for increasing mobility across the city. The *Voluntary Vacant Property Acquisition Program* will prioritize properties near **transit-accessible areas**, especially along these high-frequency routes, ensuring that residents have easy access to public transit, jobs, healthcare, and educational opportunities. In this way, the proposal directly contributes to HUD's goal of **locating affordable, accessible housing near transit** and **bolstering access to services and opportunities**.

Infill Development in High-Opportunity Areas

Through the *Pre-Approved Plans Program*, the proposal will facilitate infill development in **high-opportunity neighborhoods**, which were identified in the *Housing Strategy* as areas with access to high-quality schools, employment centers, healthcare services, and other community amenities. By expediting the approval process for pre-approved plans, the program will promote **affordable infill housing** in neighborhoods that have historically lacked affordable housing options, aligning with HUD's objective of **expanding affordable housing in well-resourced areas**.

Alignment with Anti-Displacement Strategies

Targeted Anti-Displacement Measures

The *Voluntary Vacant Property Acquisition Program* is designed with a robust strategy to prevent displacement of long-time residents and support community stability. A common occurrence in Tulsa is that owners inherit properties or move elsewhere without selling them, leaving them burdened with **clouded titles, liens, and back property taxes**. These vacant or blighted properties often go untended, creating housing and safety issues for surrounding residents. Through this proposal, the City will partner with **Code Enforcement** to identify properties in violation of codes or those flagged for potential demolition. The approach focuses on **engaging with property owners** to provide them with fair options while ensuring the revitalization of properties and communities.

Collaborative Process with Code Enforcement

The city's **Code Enforcement department** has a well-established process for flagging properties that may be in violation of building or safety codes. When a property is flagged, the city posts a notice, giving the owner **30 days** to either provide a plan for rehabilitation or request that the city demolish the property. If the owner responds with a rehab plan, the city will monitor the property's progress and provide access to available **subsidy programs** to help with rehabilitation costs. In cases where owners are uninterested in keeping the property, the grant program will work directly with them to **acquire the property**, clear any **liens**, and rehabilitate or redevelop it.

This ensures owners are treated fairly and not pressured into losing their property, providing a **voluntary, community-centered approach** to property acquisition that prevents displacement. For those who do not respond to notices, the property will eventually go through the city's demolition process. Once a property is demolished and becomes a vacant lot, the grant program

will then acquire the lot for redevelopment, ensuring that these lots are **redeveloped into affordable housing** in alignment with HUD’s goals.

How This Approach Prevents Displacement

By working closely with **property owners and Code Enforcement**, this program offers a **multi-tiered approach** to property acquisition, ensuring that owners have ample opportunity to engage in rehabilitation efforts before any demolition occurs. This collaborative process allows for the preservation of existing housing where possible, and where not, provides fair compensation and support for owners wishing to part with their properties. The **Voluntary Vacant Property Acquisition Program** therefore avoids the negative consequences associated with more aggressive acquisition methods, such as eminent domain, and aligns with HUD’s goals of **deconcentrating poverty, expanding housing choice, and ensuring equitable access to housing opportunities** in well-resourced areas.

By ensuring that **community engagement** is at the heart of the process and that property owners are not displaced unfairly, this proposal represents a significant improvement over past methods of property acquisition in Tulsa. The proposal aligns with HUD’s objectives by **expanding affordable housing in a manner that promotes desegregation** and providing **affordable units in high-opportunity areas** through a **voluntary and equitable process**.

Alignment with Job Creation and Economic Development

Supporting Job Creation and Retention

The proposal is closely tied to Tulsa’s broader economic development goals, including job creation and retention. By expanding affordable housing options, particularly in areas near **employment hubs** and **public transit**, the proposal ensures that low- and moderate-income workers can access jobs and educational opportunities. The *Tulsa Housing Strategy* highlighted the need for affordable housing near employment centers to reduce commuting times and support **workforce stability**, which is critical for job retention and economic mobility. The housing developments proposed through the **Voluntary Vacant Property Acquisition Program** and **Pre-Approved Plans Program** will specifically target areas where access to jobs is prioritized, ensuring that housing investments contribute to **regional economic development**.

Alignment with Workforce Housing Goals

Additionally, the **Affordable Housing Priority Program** will play a significant role in supporting workforce housing development by fast-tracking the approval of mixed-income and affordable housing projects. This will not only increase housing stock but also ensure that the developments support Tulsa’s growing workforce needs, particularly in sectors such as healthcare, education, and technology, where housing affordability is a significant barrier to worker retention.

Leveraging Existing Assets and Complementary Efforts

The proposal will **leverage ongoing efforts and resources** from several key stakeholders and city departments to amplify its impact. These include:

- **PartnerTulsa:** Existing properties managed by *PartnerTulsa* will be incorporated into the broader framework of affordable housing development, particularly in areas where zoning reforms and new housing incentives are being implemented.
- **SGA’s Zoning and System Assessments:** The **zoning code assessments, spatial analysis, and incentive program reviews** conducted by *SGA* will build on work already underway in the *Tulsa Planning Office* and *Department of Development Services*, ensuring alignment with HUD’s goals for **streamlined, efficient housing production**.
- **Housing Forward:** Technical assistance from *Housing Forward* will ensure that Tulsa’s affordable housing ecosystem is aligned with best practices for developer capacity building and long-term sustainability.
- **Bus Rapid Transit Expansion:** By targeting development near **BRT routes**, the proposal aligns with Tulsa’s broader **regional transportation plans**, ensuring that affordable housing is built in areas with easy access to transit and jobs.
- **Energy Efficiency and Climate Resilience:** The proposal will explore partnerships with existing energy-efficiency incentive programs and leverage *Tulsa’s Office of Resilience and Equity* to incorporate **resilient and energy-efficient features** into new housing developments.

Tulsa’s PRO Housing proposal is a comprehensive strategy that directly advances and complements existing planning initiatives, zoning reforms, and transportation investments. By targeting high-opportunity areas, promoting anti-displacement strategies, aligning with job creation and retention efforts, and leveraging complementary resources from SGA, Housing Forward, and PartnerTulsa, the proposal is positioned to significantly expand Tulsa’s affordable housing stock in a sustainable, equitable, and coordinated manner. This approach directly supports HUD’s goals of promoting desegregation, expanding housing choice, and streamlining the housing development process while ensuring that Tulsa’s long-term housing needs are met.

Tulsa’s Environmental Risks and Community Resilience Efforts

Tulsa faces several significant environmental risks that have shaped the city’s resilience planning efforts. The **most prominent environmental risks** include **flooding**, particularly in low-lying areas near the **Arkansas River**, and **extreme weather events**, such as severe storms, tornadoes, and the increasing impacts of **climate change**. In response, Tulsa has developed comprehensive plans, through initiatives such as the **Mayor’s Office of Resilience and Equity** and partnerships with **Tulsa’s Public Works Department**, to mitigate these risks and build a more resilient community.

Alignment of the Proposal with Community Resilience

The PRO Housing proposal is fully aligned with **Tulsa’s broader resilience efforts**, ensuring that housing production and preservation activities promote long-term community resilience. The proposal integrates **energy-efficient features**, stormwater management strategies, and site selection that mitigates flood risk. These efforts align with the city’s **Resilience Strategy** and HUD’s **Community Resilience Toolkit**, ensuring that Tulsa’s affordable housing developments

not only address immediate housing needs but also contribute to a more sustainable and climate-resilient future.

Flood Risk Mitigation and Site Selection

Floodplain Management and Site Selection

Tulsa's **flood risk** is exacerbated by its location along the Arkansas River and its history of significant stormwater events. As part of the **Voluntary Vacant Property Acquisition Program**, the City will prioritize acquiring properties outside of **flood-prone areas**. The **Tulsa Planning Office**, in collaboration with **Code Enforcement**, will work with **SGA** to leverage the **Spatial Analysis and Housing Suitability Mapping Project** to ensure that properties selected for redevelopment are located in areas that are **resilient to flood risk**. The analysis will account for **flood zones**, ensuring that new developments are located in safer, more resilient areas that are not prone to repetitive flood damage. This approach will help protect both the city's housing stock and its most vulnerable residents from environmental hazards.

The proposal will also integrate **stormwater management strategies**, working closely with **Tulsa's Stormwater Management Department** to incorporate stormwater drainage improvements and **green infrastructure solutions** where necessary. This includes using **permeable surfaces** and **rainwater retention systems** to manage stormwater runoff and mitigate the effects of heavy rain.

Energy-Efficient and Resilient Housing Design

Energy-Efficient Features

Tulsa's extreme weather conditions, including severe storms and extreme heat, require housing that is both energy-efficient and capable of withstanding adverse conditions. The proposal will incorporate **energy-efficient design elements** into new housing developments, including the use of **high-performance insulation, energy-efficient HVAC systems, Energy Star-certified appliances, and solar-ready infrastructure** where feasible. These features align with HUD's **Community Resilience Toolkit** recommendations and will ensure that newly developed homes are **energy-efficient**, reducing both utility costs and carbon emissions.

Additionally, the proposal will encourage the use of **native vegetation** in landscaping to reduce water usage and increase the resilience of housing developments to extreme heat. This approach will help reduce the demand for irrigation and promote biodiversity, while also mitigating the **urban heat island effect**, which is a growing concern in Tulsa.

Green Building Standards and Incentives

The PRO Housing proposal will leverage existing **energy-efficiency incentive programs** such as the **OG&E Positive Energy Program**, which provides financial incentives for energy-efficient new construction, and the **Oklahoma Weatherization Assistance Program** for low-income homeowners. These partnerships will allow developers to access the resources needed to implement **green building standards**, ensuring that homes are designed to meet both **affordability** and **sustainability** goals. Where applicable, new construction will follow **LEED (Leadership in Energy and Environmental Design)** standards, incorporating **renewable energy systems, high-efficiency windows, and sustainable building materials**.

Addressing Climate Change and Promoting Long-Term Resilience

Climate Change Mitigation

Tulsa’s growing vulnerability to the impacts of **climate change**—including rising temperatures, more frequent and severe storms, and potential disruptions to infrastructure—requires a proactive approach to resilience. The City’s PRO Housing proposal incorporates key climate resilience strategies, such as **locating housing developments in low-risk areas** and **designing homes to withstand extreme weather events**. The **Pre-Approved Plans Program** will include design elements that are adapted to **Tulsa’s unique climate risks**, such as reinforced roofing materials, impact-resistant windows, and flood-proofing measures for homes near water bodies.

Community Resilience Planning

The proposal is also aligned with **Tulsa’s Office of Resilience and Equity**, which leads the city’s efforts to develop long-term strategies for environmental sustainability and equity. The office focuses on **building climate resilience**, particularly for vulnerable populations, by promoting **energy efficiency** and **climate-adapted infrastructure**. The new housing developments proposed under the PRO Housing plan will integrate the office’s recommendations to build climate-resilient, affordable housing that is both **environmentally sustainable** and **socially inclusive**.

Leveraging Existing Resilience Resources

The PRO Housing proposal will leverage several existing citywide resources and initiatives to enhance community resilience, including:

- **Tulsa’s Flood Hazard Mitigation Program:** This program has been recognized nationally for its comprehensive floodplain management efforts, and the PRO Housing plan will align with these efforts by ensuring that new housing developments are located outside of floodplains and designed with resilient infrastructure.
- **Resilient Tulsa Strategy:** The proposal will also leverage the *Resilient Tulsa Strategy*, which focuses on creating an equitable and resilient community. By incorporating energy-efficient and resilient features into housing developments, the proposal supports the broader resilience goals of this strategy.
- **Oklahoma Housing Finance Agency’s Weatherization Program:** This program will provide critical resources to ensure that new affordable housing developments meet energy-efficiency standards, making them more resilient to extreme temperatures and reducing long-term utility costs for residents.

Tulsa’s PRO Housing proposal is fully aligned with the city’s efforts to build a **resilient, sustainable housing ecosystem** that promotes community resilience and mitigates the effects of climate change. By integrating **energy-efficient features, flood risk mitigation strategies, and resilient housing designs**, the proposal ensures that Tulsa’s most vulnerable populations are protected from environmental risks while also contributing to long-term sustainability goals. Through partnerships with **Code Enforcement, the Office of Resilience and Equity, and existing energy-efficiency programs**, the proposal not only addresses Tulsa’s current housing needs but also positions the city for a more climate-resilient future.

Potential Roadblocks to Implementation

While Tulsa’s PRO Housing proposal is designed to efficiently expand the city’s affordable housing production and preservation, there are several potential roadblocks that may arise during implementation. These challenges span legislative, financial, procedural, and operational issues. However, the proposal also includes strategies to mitigate these risks and ensure the success of the proposed activities.

1. Legislative and Policy Challenges

Delays in Zoning and Land Use Reforms

One potential roadblock is the **delayed adoption of zoning reforms**, which are critical to enabling increased density and the development of affordable housing in underutilized areas. While the City has already made progress by adopting the **Neighborhood Infill Overlay** and is currently advancing the **Housing Feasibility Amendments**, there could be challenges in securing broader zoning reforms that are necessary for the **Affordable Housing Priority Program** and the **Voluntary Vacant Property Acquisition Program**. These reforms include **expanding density allowances**, updating **land-use permissions**, and enabling **ADUs and duplexes by-right** in certain neighborhoods.

Additionally, resistance from **neighborhood associations** or other community groups could delay rezoning processes, particularly in areas where affordable housing may face **Not In My Backyard (NIMBY)** opposition. This could slow down progress on **infill housing** and **redevelopment efforts**.

Mitigation Strategy

To address this, the proposal includes the creation of the **Housing Strategy Coordinator** position, which will work closely with stakeholders, including the **Tulsa Planning Office**, **City Council**, and community groups, to advance these zoning reforms. The Coordinator will ensure that community engagement is proactive and that zoning changes are informed by **stakeholder input** to build broader consensus. **SGA’s technical assistance** will also provide a detailed **zoning code assessment** to recommend best practices and solutions for overcoming local zoning challenges.

Additionally, the City’s **Path to Home Initiative** and **3H Task Force** have begun to address some of these challenges by facilitating dialogue between housing advocates, developers, and local government. This proposal builds on these efforts and aims to formalize **consistent stakeholder engagement processes** to navigate any legislative challenges that arise.

2. Procedural and Bureaucratic Barriers

Complex and Lengthy Permitting Process

One of the key barriers to housing development in Tulsa is the **complexity of the permitting process**, which involves multiple departments, reviews, and approvals. Feedback from developers indicates that the **plan review process** is inconsistent and often causes significant delays, particularly for affordable housing projects. Although the City has begun making improvements—such as adopting an **online permitting system**—this system is still being rolled out, and inefficiencies persist.

Mitigation Strategy

The **Housing Project Coordinator** will play a critical role in addressing these procedural

challenges by serving as a **liaison between developers and city staff**, ensuring a more streamlined and collaborative permitting process. Additionally, the proposal includes the implementation of a **fast-track approval process** specifically for affordable housing and other catalytic projects, which will significantly reduce permitting timelines for developers participating in the **Voluntary Vacant Property Acquisition Program** and the **Pre-Approved Plans Program**. The City will also leverage **SGA's Comprehensive Systems Analysis** of the permitting and development review processes to identify bottlenecks and recommend process improvements.

3. Funding and Financial Constraints

Development Funding Gaps

A major challenge to implementing affordable housing projects is the **development funding gap**, especially in projects where the cost of building affordable housing exceeds the affordable sales price or rental income. This funding gap has previously stalled or delayed projects in Tulsa, particularly for **minority-owned developers** who have fewer financial resources.

Mitigation Strategy

To counteract this barrier, the proposal includes the creation of a **Redevelopment Fund** that will offer **subsidies to developers** to bridge the funding gap. This will ensure that developers are incentivized to participate in the **Voluntary Vacant Property Acquisition Program**, with financial support to make affordable housing projects feasible. In addition, the proposal will leverage **complementary funding streams** from programs such as **CDBG, HOME, and energy-efficiency incentive programs** to support redevelopment efforts. The program will also work closely with **TEDC and PartnerTulsa**, which have experience supporting minority developers and bridging financial gaps through technical assistance and training programs. Furthermore, the **Housing Forward partnership** will provide strategic guidance to help secure additional funding for affordable housing development and leverage public and private financing tools such as **tax credits and bond financing**.

4. Stakeholder Coordination and Engagement

Fragmentation of the Housing Ecosystem

Tulsa's housing ecosystem is currently characterized by **fragmented and siloed efforts**, with multiple departments, agencies, and organizations involved in housing development and preservation. This lack of coordination has led to **duplication of efforts** and inefficiencies in achieving housing production goals. While the City launched the **Path to Home Initiative** to address this issue, the structures and systems necessary to support true collaboration and accountability are still lacking.

Mitigation Strategy

The proposal addresses this by introducing a **formalized structure for stakeholder coordination**, led by the Housing Manager and the two new positions funded by this grant. **SGA's Community Engagement Evaluation** will provide a framework for engaging a diverse set of stakeholders, including developers, community groups, business leaders, and government agencies, in a **coordinated, streamlined approach** to housing development. The establishment of an **advisory committee and working groups** will ensure that key stakeholders are involved

in both the planning and implementation phases, preventing the miscommunication and duplication that has hindered previous efforts.

Additionally, the **Affordable Housing Priority Program** will introduce a system for prioritizing and fast-tracking affordable housing projects, ensuring that resources and efforts are concentrated on the most critical projects. By creating formal channels for communication and decision-making, the proposal will eliminate fragmentation and improve **inter-agency coordination**.

5. Community Opposition and Public Perception

Community Resistance to Affordable Housing

As with many communities, Tulsa may face **resistance from local residents** regarding the development of affordable housing, particularly in areas perceived as high-opportunity or well-resourced. Concerns about property values, increased density, and changes to neighborhood character can create obstacles to the development of affordable housing.

Mitigation Strategy

To address community resistance, the proposal includes a strong emphasis on **community engagement** and **public education**. The **Housing Strategy Coordinator**, working closely with **SGA's Community Engagement Evaluation**, will lead efforts to inform and educate the public about the benefits of affordable housing and how it can be developed in a way that aligns with community values. This will include **outreach campaigns**, **public forums**, and **stakeholder meetings** to build support for the housing initiatives proposed in the PRO Housing plan.

The proposal will also utilize **data-driven impact assessments** to demonstrate how affordable housing development aligns with **community resilience**, **economic development**, and **long-term sustainability** goals. By proactively addressing concerns and involving the community in decision-making, the proposal will reduce opposition and build broad-based support.

Addressing Post-Implementation Challenges

Even after successful implementation, the proposal anticipates that there may be lingering challenges, particularly around ensuring **long-term sustainability** and **ongoing stakeholder collaboration**. To counteract these barriers, the proposal includes the following strategies:

- **Continuous Monitoring and Evaluation:** The proposal includes a system for tracking the progress of all programs and activities through **performance metrics** established during the planning phase. These metrics will allow the City to identify and address any remaining inefficiencies or challenges in the housing development process.
- **Leveraging Technical Assistance from SGA:** The continued partnership with **Smart Growth America** and **Housing Forward** will ensure that the City has access to expert guidance on zoning reforms, funding strategies, and systems improvements.
- **Ongoing Community Engagement:** The City will establish regular **feedback loops** with community members and stakeholders to ensure that the affordable housing programs remain responsive to community needs and continue to promote equity and resilience.

Tulsa's PRO Housing proposal is designed to anticipate and overcome several potential roadblocks, from zoning and legislative challenges to procedural inefficiencies and community opposition. By implementing a coordinated, evidence-based approach, leveraging technical

assistance, and focusing on collaboration, the proposal ensures that these challenges are addressed head-on. The proposal's emphasis on **zoning reforms, fast-tracked permitting, and financial incentives** will mitigate key barriers to affordable housing production, while its **community-centered approach** ensures long-term success.

D.ii. Proposed Geographic Scope

Geographic Scope of the Proposal

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

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

Expanding Opportunity in Underserved Communities

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

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

Creating and Preserving Housing in High-Opportunity Areas

Simultaneously, the program will focus on developing housing in **high-opportunity areas**, as identified through the **Housing Suitability Mapping Project**. The mapping will provide data on

where housing developments can maximize **access to jobs, quality education, transit, healthcare, and other critical resources**. This will allow for the **strategic placement of new affordable housing units** in areas that have historically been inaccessible to low-income households.

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

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

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

Citywide Impact and Strategic Flexibility

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

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

In terms of **program implementation**, Tulsa will not operate a subgrant program, but will instead develop **direct partnerships** with local developers and community-based organizations. Developers will follow a clear process involving **developer agreements** and **financial documentation** to ensure that projects meet the city's affordability and development standards. **Costs for title clearing, infrastructure improvements, and demolition** will be covered by the city before lots are transferred, ensuring that development-ready properties are available without the burden of upfront costs for developers.

D.iii. Commitment to Community Engagement

Key Stakeholders and Outreach in Developing the Proposal

The development of this proposal is rooted in the extensive stakeholder engagement that occurred throughout the creation of the **Tulsa Housing Strategy, Comprehensive Plan (PLANiTULSA), Citywide Housing Assessment, and the Consolidated Plan**. Each of these strategic documents reflects Tulsa's ongoing commitment to addressing the unmet housing needs of its residents, and this proposal directly aligns with their recommendations and priorities. The outreach efforts were conducted across a broad spectrum of stakeholders to ensure that all relevant voices were heard and incorporated into the design of this proposal. Additionally, continued engagement will ensure that the proposal remains responsive to emerging needs during the grant's period of performance.

The **Tulsa Housing Strategy** was informed by a comprehensive, community-informed process that engaged a wide range of housing ecosystem stakeholders. This included local government representatives, developers, financial institutions, housing advocates, and philanthropic organizations. Input was sought from community organizations representing underserved communities, residents of affordable housing, persons with unmet housing needs, and protected class groups under the Fair Housing Act.

A critical aspect of stakeholder engagement came through **PartnerTulsa**, the city's lead agency for economic development, which brought together **local public agencies, developers, and business leaders** to discuss key barriers to affordable housing development and strategies for overcoming them. Through PartnerTulsa's leadership, entities such as **the Tulsa Housing Authority (THA), Tulsa Economic Development Corporation (TEDC)**, and local developers like **Boomtown Development** were key contributors in helping us understand the specific challenges they face in developing affordable housing in Tulsa.

During the development of the **Tulsa Housing Strategy**, input was solicited from a wide array of stakeholders. **A Way Home for Tulsa**, led by **Housing Solutions**, engaged deeply in this process to ensure that the needs of Tulsa's most vulnerable populations—such as the homeless and those at risk of homelessness—were considered. In addition, the **Mayor's 3H Task Force** and **Tulsa's Path to Home Initiative** were instrumental in building support for this proposal among business and civic leaders. These task forces work across various sectors, including public health, mental health, housing, and economic development, to create comprehensive solutions for housing challenges.

Strategy for Continued Engagement During the Grant Period

Throughout the grant's period of performance, the City of Tulsa will maintain and expand its ongoing engagement strategy. This will include working closely with local community development organizations such as **Crossover Community Impact, Habitat for Humanity, and Growing Together**, alongside agencies like **THA and PartnerTulsa**. By engaging **protected class groups** and underserved communities, the proposal will ensure that new affordable housing units are accessible to those most in need.

In particular, the city will collaborate with **local affordable housing developers and minority developers** through organizations like TEDC to prioritize minority-owned and mission-driven developers for the housing initiatives outlined in this proposal. Community outreach will be targeted to **North Tulsa and East Tulsa**, areas of significant housing need, to ensure that residents are aware of the opportunities available to them under this program. Engagement

efforts will be coordinated with **local community land trusts**, such as the **Kendall Whittier Neighborhood Trust**, to ensure long-term affordability for new housing developments.

Specific Actions Taken to Solicit Input from Stakeholders

The City of Tulsa relied heavily on the input gathered during the development of the **Citywide Housing Assessment** and the **Tulsa Housing Strategy**. These documents reflect the community's priorities regarding housing development and affordability. Throughout the strategy's development, stakeholders like **A Way Home for Tulsa**, **Greater Tulsa Association of Realtors**, **Tulsa Housing Authority**, **Mental Health Association Oklahoma**, **Habitat for Humanity**, and the **Home Builders Association of Greater Tulsa** provided input on housing production, affordability, and the barriers faced by developers.

Public engagement events and surveys conducted by the **Tulsa Planning Office** shaped this proposal by identifying the areas of greatest unmet housing need. Through engagement efforts conducted as part of **PLANiTULSA**, the comprehensive plan process, residents provided feedback on critical issues such as zoning and land use regulations, which directly informed the recommendations and activities proposed in this grant.

Incorporation of Stakeholder Input into the Proposal

This proposal integrates stakeholder feedback to ensure that all perspectives are reflected in the planned activities. Stakeholder input shaped the proposal in several significant ways, including the decision to focus on acquiring vacant and blighted properties, addressing housing affordability in high-opportunity areas, and ensuring equitable access to new housing opportunities through **affirmative fair housing strategies**. The proposal also reflects the community's call for greater collaboration between public agencies and private developers, with a focus on addressing **development gaps**, expanding capacity for minority developers, and ensuring that development supports **affordable housing for households earning 80% of AMI** or less.

Additionally, the engagement process underscored the need for **technical assistance and capacity-building** for minority developers, which has been incorporated into the proposal through partnerships with organizations like TEDC and **PartnerTulsa**. These organizations will help ensure that the proposal not only increases the production of affordable housing but also supports local economic development and expands the diversity of housing developers involved in the process.

The result of this stakeholder engagement is a well-rounded, inclusive proposal that reflects the needs of Tulsa's most vulnerable populations while addressing the systemic barriers to affordable housing production. The city will continue to prioritize stakeholder engagement and collaboration throughout the grant's period of performance to ensure that the proposal's activities remain responsive and impactful.

To affirmatively further fair housing (AFFH), the City of Tulsa's proposal is designed to align with HUD's goals of removing barriers to affordable housing, promoting desegregation, and ensuring that protected class groups have equitable access to well-resourced areas of opportunity. The proposal emphasizes addressing systemic issues of segregation, increasing housing choice, preventing displacement, and providing affordable, accessible housing to underserved communities. Each aspect of the proposal is informed by HUD's AFFH objectives and specific

feedback from community stakeholders, with strategic activities designed to ensure compliance with federal nondiscrimination requirements.

D.iv. Affirmatively Furthering Fair Housing

Affirmative Fair Housing: Removing Barriers to Affordable Housing in Well-Resourced Areas of Opportunity

The City of Tulsa’s PRO Housing proposal directly addresses barriers to affordable housing production in high-opportunity areas, building upon insights from the **Tulsa Housing Strategy** and the **2020-2024 Consolidated Plan**. These areas are defined by their access to amenities such as transportation, quality schools, healthcare, and employment opportunities. By focusing on well-resourced areas, the program ensures that low- and moderate-income households—particularly underserved groups—have access to the same benefits as more affluent residents. A key component of this strategy is the **Voluntary Vacant Property Acquisition and Development Program**, which will leverage vacant properties in high-opportunity areas, ensuring they are developed into affordable housing. This approach ensures that individuals from underserved communities, particularly **Black and Hispanic households**, will have access to housing in areas traditionally dominated by higher-income residents. To further expand opportunity, the proposal includes a **redevelopment fund** to subsidize infrastructure costs, thereby lowering the financial barriers for developers willing to build affordable housing in these areas.

Housing choice vouchers and other tools will be prioritized for these developments, helping low-income families move into these communities. The **Housing Project Coordinator** will work with **Smart Growth America (SGA)** to identify zoning regulations and procedural barriers that disproportionately limit affordable housing in well-resourced areas and collaborate with local agencies to address these issues.

Promoting Desegregation and Addressing Policies that Perpetuate Segregation

Tulsa's history of racial segregation is a major challenge in achieving equitable housing. The proposal recognizes that restrictive zoning policies and land-use regulations have perpetuated this segregation by limiting the development of affordable housing in predominantly white, affluent neighborhoods. **SGA’s zoning code assessment**, in partnership with the **Tulsa Planning Office**, will focus on identifying and reforming these barriers, creating a more inclusive housing environment.

The **Pre-Approved Plans Program** will streamline the approval process for affordable housing in mixed-income and historically segregated areas, providing a clear path for small developers to create housing that meets AFFH requirements. By proactively addressing exclusionary zoning policies and simplifying the development process, the proposal promotes housing production in areas that have previously resisted affordable housing development.

The racial composition of beneficiaries will be diverse, but it is expected that **Black, Hispanic, and Native American households**, who have historically been excluded from well-resourced areas, will benefit significantly from these activities. The proposal will foster greater racial integration, increasing housing choice across the city.

Expanding Housing Choice and Preventing Concentration of Affordable Housing in Low-Opportunity Areas

To prevent further concentration of affordable housing in low-opportunity areas, our proposal focuses on **geographic diversity** in the placement of new affordable units. By using data from the **Citywide Housing Assessment** and SGA's comprehensive systems analysis, the proposal identifies both high-opportunity and underserved areas, ensuring affordable housing is not disproportionately concentrated in areas with existing housing challenges.

Through the **Affordable Housing Priority Program**, the city will prioritize the development of affordable units in areas with access to transit, employment, and public services. Developers will be incentivized to build in areas that promote upward mobility for low-income residents, ensuring that housing choice expands to neighborhoods that have historically lacked affordable options. By including these affordable units in mixed-income developments, the city will avoid further concentrating poverty in any one neighborhood.

Addressing the Unique Housing Needs of Protected Class Groups

The proposal takes a targeted approach to address the housing needs of **people with disabilities, families with children, and underserved communities of color**. In compliance with the **Americans with Disabilities Act (ADA)** and **Fair Housing Act** accessibility requirements, all new housing developments will incorporate **universal design principles**, ensuring that people with disabilities have full access to affordable housing options.

The **Housing Strategy Coordinator** will work closely with organizations like **A Way Home for Tulsa** and member agencies, including **Mental Health Association Oklahoma**, to ensure that housing developed under this proposal meets the needs of people requiring supportive services, enabling independent living. Family housing units will also be a priority, with larger units designed for families with children and developments located near schools and childcare facilities.

Addressing Displacement Risks

The proposal includes comprehensive **anti-displacement measures** to prevent the involuntary displacement of residents, particularly those in communities of color. One of the primary anti-displacement strategies is engaging property owners through **Code Enforcement** and offering subsidies to rehabilitate homes before they fall into severe disrepair, as detailed in the **Voluntary Vacant Property Acquisition Program**. Owners who are unwilling or unable to rehabilitate their properties will have the option to sell voluntarily, allowing the city to clear titles and redevelop the properties as affordable housing.

Additionally, the program will ensure that affordable units created through this proposal are not removed from the affordable housing stock by imposing **affordability preservation clauses**. These clauses will ensure long-term affordability by placing covenants or land-use restrictions that prevent developers from selling units at market rates after development, which has been a common source of displacement in other cities.

Supporting People with Disabilities and Promoting Independent Living

To address the housing needs of **people with disabilities**, the proposal will work closely with developers to ensure that a significant percentage of the newly created affordable units are fully accessible. In collaboration with **Housing Solutions**, the lead agency for the Tulsa County HUD funded Continuum of Care, the city will provide access to **supportive services** for people with

disabilities, ensuring that they can live independently in the community while maintaining access to transportation, healthcare, and employment.

The **Pre-Approved Plans Program** will incorporate accessible designs, making it easier for small developers to build housing that meets the needs of people with disabilities. Additionally, the proposal includes plans to engage ADA experts to ensure compliance with accessibility standards across all new developments.

Engaging and Supporting Minority-, Women-, and Veteran-Owned Businesses

The proposal includes a plan to **actively engage minority-, women-, and veteran-owned businesses** during the housing production process. Through partnerships with **TEDC**, **PartnerTulsa**, and **minority business advocacy groups**, the city will offer technical assistance and capacity-building opportunities to these businesses, ensuring they are well-positioned to participate in the **Affordable Housing Priority Program**.

The city will also establish a **diversity and equity plan** to ensure that all contractors, developers, and service providers involved in the program reflect the community's diversity. This plan will promote racial and gender equity in the housing development process and ensure that minority- and women-owned businesses receive priority consideration during the RFP process for housing projects funded by this proposal.

Promoting Racial Equity and Tracking Progress

The proposal will evaluate its impact on promoting racial equity and desegregation by implementing **equity-based performance metrics**. This will include tracking the racial composition of beneficiaries, the geographic distribution of affordable housing units, and the extent to which new developments promote desegregation and de-concentration of poverty. The **Housing Strategy Coordinator**, in collaboration with SGA, will be responsible for collecting and analyzing data to assess the proposal's success in furthering racial equity and AFFH goals. Additionally, affirmative marketing strategies will be employed to ensure that **low-income households of color**, people with disabilities, and other protected class groups are aware of the affordable housing opportunities created through this proposal. These marketing efforts will be designed to reach demographic groups that have been historically underserved by the housing market and least likely to apply for housing without such outreach.

This proposal is designed to affirmatively further fair housing by addressing systemic barriers to affordable housing, expanding housing choice, and promoting desegregation. By focusing on underserved communities, preventing displacement, and ensuring that new developments meet the needs of protected class groups, the City of Tulsa will advance HUD's objectives of racial equity, accessibility, and affordability throughout its housing ecosystem.

D.v. Budget and Timeline

v. Budget and Timeline Proposals (5 points)

The proposed budget of \$5,758,128.20 for the City of Tulsa's PRO Housing activities is carefully designed to support the key components of the City's housing ecosystem. The budget encompasses acquisition and development costs, as well as personnel costs for two key roles—

Housing Project Coordinator and Housing Strategy Coordinator—that are critical to the planning and implementation of the proposed programs.

The acquisition and development component, which totals \$4,000,000, includes costs for acquiring lots, clearing titles, conducting demolition, and repairing infrastructure. The rehabilitation of 20 housing units and construction of 20 new units will be executed in phases, ensuring cost-effective implementation and allowing time for strategic oversight. The personnel costs are essential to the sustainability of the project, with a total cost of \$1,234,662 for the 6-year grant period. These two positions will ensure the successful coordination and alignment of Tulsa's housing strategy with HUD priorities, while supporting the entire housing ecosystem's transformation efforts.

The timeline for these activities is planned over a 6-year period, starting with a detailed planning phase of six months, during which the City will hire the necessary personnel and work closely with Smart Growth America (SGA) to conduct process analysis, review, and implement best practices. During this time, core programs like the Pre-Approved Plans Program, Vacant Property Acquisition Program, and Affordable Housing Priority Program will be prepared for full implementation. Once this initial stage is complete, the next six months will focus on implementing the strategic recommendations, formalizing the stakeholder engagement structure, and launching key policy and process reforms that will scale up citywide.

The property acquisition program will begin after the first year of planning and continue in phased stages. Each phase will include the acquisition and development of 10 properties, with milestones established at each completion phase. This phased approach will allow for real-time adjustments based on feedback, assessment, and ongoing collaboration with stakeholders.

The City will also prepare for regular HUD reporting, ensuring that compliance is maintained with all performance tracking, financial monitoring, and reporting requirements as laid out in the HUD guidelines. This will include quarterly reports on milestones, challenges, and progress made in affordable housing production and preservation.

In terms of scaling the project, if HUD were to award less than the requested amount, the City would focus on scaling down specific components such as the Vacant Property Acquisition Program, reducing the number of units constructed or rehabilitated while still maintaining the overall program structure. If the budget were reduced by 50%, the City could still achieve the goals of establishing key personnel roles, launching the Pre-Approved Plans Program, and scaling down the acquisition and development efforts to complete 10 units rather than the full 40.

This strategic and phased approach, combined with the strong capacity for planning and implementation, ensures that the proposal will not only meet HUD's objectives but also create a sustainable and efficient affordable housing pipeline that will last well beyond the duration of the grant.

Acquisition & Development	Per Unit	Rehab (20 units)	New Const. (20 units)	Total
Lot Acquisition	\$ 30,000.00	20	20	\$ 1,200,000.00
Legal Costs (Title Clearance)	\$ 5,000.00	20	20	\$ 200,000.00
Demolition (New Construction Only)	\$ 10,000.00	0	20	\$ 200,000.00
Infrastructure Repair (50% of units)	\$ 120,000.00	10	10	\$ 2,400,000.00
Total Development Costs				\$ 4,000,000.00

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

Total PRO Housing Program Costs	\$ 5,234,662.00
<i>Administrative (10%)</i>	<i>\$ 523,466.20</i>
Total PRO Housing Grant Request	\$ 5,758,128.20

E. Capacity and Staffing Plan

Organizational Structure and Key Personnel

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

Furthermore, the City has plans to contract with Smart Growth America (SGA), a national leader in housing policy and urban development, to provide technical assistance in planning and implementing best practices. SGA will assist with system-level improvements, including housing suitability mapping, comprehensive zoning code assessments, and coordinated systems for stakeholder engagement. These efforts will be managed through the new Housing Strategy Coordinator, ensuring that recommendations from SGA are fully integrated into the city's long-term housing strategies.

Capacity for Project Management, Financial and Procurement Oversight

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

The City of Tulsa has robust procurement systems and an internal compliance review process that ensures adherence to 2 CFR Part 200 federal regulations. This includes not only the process of selecting contractors but also ongoing monitoring to ensure that all subrecipients comply with program guidelines. The City has successfully utilized these procurement and financial oversight systems for large-scale projects, including federal stimulus funding related to the COVID-19 pandemic, and will continue to leverage these systems for this proposal.

The city also has a well-established vendor and partner management process, utilizing subrecipient agreements to ensure clarity in roles, responsibilities, and performance expectations. This includes clearly defined reporting mechanisms and performance metrics, which will be extended to partners such as TEDC and PartnerTulsa to ensure they meet federal compliance standards while implementing their parts of the proposal.

Partner Capacity and Coordination

As a further demonstration of capacity, the City of Tulsa has a history of successful collaboration with public and private partners. This proposal will build on those partnerships, including with TEDC, PartnerTulsa, and the Tulsa Development Authority (TDA). TEDC's role as a CDFI will be critical in overcoming the developer capacity barriers outlined in this proposal. TEDC's extensive network of local developers and its ability to provide financial assistance will allow the City to scale up development activities and provide critical resources to minority- and women-owned developers, addressing a key barrier to equitable housing development.

PartnerTulsa, which oversees the Tulsa Housing Strategy, has demonstrated its capacity to manage large-scale real estate development projects, including its role in the acquisition and disposition of vacant properties. Its partnership with the Tulsa Development Authority ensures that properties can be efficiently transferred to developers once they are acquired. These entities have decades of combined experience in handling the complexities of property acquisition, legal issues related to title clearance, and urban renewal, making them ideal partners for the Voluntary Vacant Property Acquisition Program.

Housing Forward, which brings national expertise in housing development, will help the City attract larger-scale developers and implement technical solutions to streamline the permitting and development process. Housing Forward will also work with the City to provide capacity-building assistance to local developers, particularly those who are new to affordable housing development or those who have faced financial and operational challenges.

Experience with Civil Rights and Fair Housing

Building on the strong foundation laid by the Mayor’s Office of Resilience and Equity (MORE) and the annual Equality Indicators Report, this proposal integrates equity and fair housing principles into its design and implementation. MORE has spearheaded several initiatives aimed at addressing disparities in housing access, including programs that work directly with immigrant populations, communities of color, and other protected class groups. The City's experience with fair housing education and enforcement ensures that the PRO Housing program will be implemented in full compliance with the Fair Housing Act, while also prioritizing racial equity in housing development.

Through its Language Access Policy and work on racial disparities in housing, the City has shown its ability to design and implement programs that reduce economic and racial inequities. The Tulsa Housing Strategy, which emphasizes housing equity and economic mobility, will guide this program’s focus on expanding access to affordable housing for low-income and minority populations in well-resourced neighborhoods.

Managing Scaling and Reductions in Funding

In the event of partial funding, the City will prioritize the activities that can have the most immediate and long-term impact on affordable housing production. The two key staffing positions, the Housing Project Coordinator and the Housing Strategy Coordinator, will remain essential to the program’s success, even at reduced funding levels. If HUD awards less funding than requested, the City will scale back some of the property acquisition components, particularly the Voluntary Vacant Property Acquisition Program, and focus more heavily on streamlining zoning and permitting processes, which can yield substantial gains with fewer financial resources.

To ensure flexibility, the City will also phase its property acquisition activities based on available funding and can adjust the number of units targeted for rehabilitation or new construction accordingly. However, the core activities—streamlining processes, supporting minority developers, and enhancing the capacity of local developers—will proceed as planned to ensure sustained improvements in affordable housing production.

F. Leverage

LEVERAGE (MAXIMUM 10 POINTS)

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

G. Long Term Effects and Outcomes

LONG TERM EFFECT (MAXIMUM 10 POINTS)

- i. What permanent, long term effects will your proposal have? What outcomes do you expect? (10 points)

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

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

Permanent Removal of Barriers and Sustained Production

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

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

Long after the PRO Housing grant period ends, these zoning reforms will continue to support housing production, particularly in high-opportunity areas where housing supply has historically been limited due to restrictive zoning.

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

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

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

Achievements and Long-Term Outcomes

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

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

developers can compete for affordable housing projects and contribute to the city's housing goals.

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

Replicability and Model for Other Communities

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

Success Metrics and Target Outcomes

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

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

Expanding Access and Reducing Segregation

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

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