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December 23, 2014

Honorable Cindy Rosenthal Mayor of Norman P.O. Box 370 Norman, OK 73070 OF THE CITY CLERK ON 12-29-14

RE:

Page Circle Rezoning

University House aka Bishops Landing Rezoning

Dear Mayor Rosenthal:

This letter expresses my opposition to the Page Circle and Bishops Landing applications for rezoning and redevelopment as recently presented to the Norman Planning Commission on December 11, 2014. The key reasons for my opposition follow.

The University Student Market

As we are all well aware, Norman is a university town, and its prosperity and economic development needs are related to the growth of the university. That growth may be measured in several ways; however, the best way is the growth in student headcount on the Norman campus over time.

According to the most recent *University of Oklahoma Fact Book* (March 2014), the number of students on the Norman campus increased from 21,512 in the Fall, 1983 to 23,944 in the Fall, 2013. This is an increase of 2,432 students over the thirty-year period – a simple arithmetic average of only 81 students per year. That increase is a mere 0.36% compound annual growth rate over the period.

Over the most recent ten year period for which data exists, the number of students on the Norman campus actually decreased from 24,500 to 23,944 – a decrease of 556 students.

These data show (1) the long-run, thirty-year growth rate in the number of students on the Norman campus was positive but anemic, and (2) actually negative over the last ten years. This has serious implications and calls into question the need for additional student housing.

The Broader Development Context

According to the report entitled *Norman Student Housing Analysis 2011 / 2012* by CRRC, a well-known Oklahoma firm specializing in the multifamily market, the number of beds in the "Per Bed" market has grown dramatically in recent years. Specifically, the number increased from 1,296 beds in 1999 to a projected 6,398 in 2013. That was an increase of more than 5,000 beds. While that increase is large, it actually understates the addition to the stock of student housing because it does not include other types of housing options added over the period or projects currently in development. To put that in context, the combined number of existing beds in Adams Center, Couch Center and Cate Center is 2,449. So, the conclusion is the aforementioned increase in the private Per Bed market is analogous to adding two Adams Centers, two Couch Centers and two Cate Centers over the same period.

Alarmingly, that compares with an increase in the number of students on the Norman campus of only 2,605 (*OU_Fact Book*) over the same period. So, it is clear that the number of beds added over the period far exceeded the increase in number of students especially when all housing types are considered. And, additional projects are either proposed or under construction. The implication is the student housing market is currently well served, and no additional student housing stock is justified on the basis of actual need – particularly with respect to megaprojects such as these. Indeed, an excellent argument may be made that the market is or soon will become saturated and overbuilt.

Page Circle and Bishops Landing Area

The proposed Page Circle and Bishops Landing projects are generally situated east of Trout Avenue, south of Boyd Street, north of Brooks Street and west of the BNSF RR. Those projects were presented and discussed at the December 11th meeting of the Planning Commission as individual, independent projects. For very good reasons, *each of those very large projects was denied by the Commission*.

Although the Commission's decisions were correct for each individual project, a much better way to debate the merits of such projects is by using a broad comprehensive approach as opposed to considering them one at a time. One reason why such projects should be considered using a holistic approach is to ensure that the effects of multiple megaprojects can be estimated and discussed before it's too late.

Rational for Objection

First, these proposals are at variance with the Norman 2025 Plan which may only be amended if there has been a change in circumstances resulting from development of properties in the general vicinity suggesting the proposed change will not be contrary to the public interest; and, if there is a determination that the proposed change would not result in

adverse land use or adverse traffic impact to the surrounding properties or the vicinity. Neither of these conditions has been met for either of these projects nor for the projects taken as a whole.

Second, the scale of these projects is extreme. The heights of the proposed Page Circle buildings range from over 40 feet to over 80 feet excluding rooftop structures and equipment. Moreover, those structures are adjacent to narrow streets and a narrow alley, thus making them appear even larger and more imposing. The structures at Bishops Landing are described as 5 stories high for habitable structures and 6 stories for the parking garage, excluding other structures and/or equipment on the roof. However, the garage is designed to be more that 80 feet high, and such structures are commonly referred to as 8 stories.

According to City staff, Page Street will be at 26' in width, Trout Avenue is at 30' in width and Brooks Street is 34' in width.... the alley will more than likely be 12' in width....

Such large buildings in close proximity to relatively narrow streets and alleys, not to mention other structures in the area whose height is typically no more than two stories, will be visually overwhelming and intimidating. Either one of these structures will clearly be out of place, but if both are built will be even more imposing. If both projects were built, Page Street would literally become a concrete canyon similar to other densely-populated urban city centers. The sheer magnitude of these projects cannot be overstated. That is not the vision of Norman that most Norman residents have.

Third, these projects are simply too dense. The Page Circle proposal as presented replaces twenty-six, single-family homes constituting a wonderful, treed neighborhood on 4.2 acres with a megaproject consisting of 865 beds and a concrete parking garage. On a closely related matter, construction is planned over a three-year period. That schedule, of course, assumes there are no negative economic events that would postpone or cancel the project in midstream. The impact on the neighborhood resulting from such a long construction cycle would be extremely detrimental to the lives of those living in the area.

Bishops Landing currently has 340 bedrooms situated on 7.36 acres, and the current design increases the number of bedrooms to 950. It also calls for a large parking garage; however, the number of spaces is less than one per bedroom. While that density is clearly extreme, it is actually much denser than presented. The reason is because almost half of the site is a flood plain; so, the actual density is 950 bedrooms over approximately 4 net, usable acres. Moreover, the fact that the proposed redevelopment would change the natural flow of the creek and flood plain is a matter to which serious, expert objections were raised at the December 11th meeting.

To put either the Page Circle project's 865 beds or the Bishops Landing project's 950 beds into context, try to visualize the fact that each of these projects has more beds than the Adams Center's 816 beds. Clearly, this density is extreme. Worse yet, if both were to be built, the addition of 1,815 beds to the existing student housing stock would satisfy more than twenty years of growth in the student population. Recall, as earlier shown the average growth in Norman's student population is only 81 students per year.

Fourth, at the December 11th meeting of the Planning Commission, Commissioner Pailes discussed traffic problems in Norman in general and the Campus Area in particular. Her concerns, with which I agree, were discussed at length for areas around campus already experiencing moderate congestion, severe congestion or over capacity. Common sense and intimate knowledge of the area requires the conclusion that the addition of projects of this magnitude will simply make a bad situation worse.

Ingress and egress to the project proposed for Page Circle is from a dead-end street. That is, Page Street only runs from Jenkins to the BNSF railroad tracks. The implications are profound not only for ordinary traffic but also for public safety vehicles, particularly fire trucks. In the event of a fire or other public safety incident, residents and vehicles would funnel onto the narrow Page Street then to Jenkins, Trout, or the 12 foot wide alley to the west of the site thereby creating severe bottlenecks. Although the Bishops Landing project does not dead end at the BNSF RR tracks, traffic backs up at the tracks when a train comes through (about one train every 15 minutes or so) and at the busy intersection at Brooks and Classen.

The alley, located immediately west of and adjacent to the proposed Page Circle project is already very congested with pedestrian and vehicular traffic and even more congested when trash and dumpster trucks transit the alley to service the area. Moreover, Trout Street is routinely clogged with traffic. In short, the entire area within which these projects are being proposed is already heavily congested and will become worse if built.

Fifth, the development of very-high density projects on the proposed sites would profoundly and adversely affect the area due to their extreme scale, adverse impact on traffic, noise and privacy, increased demand on utilities and other public services – particularly public safety. Even if only one of these projects were built now the effect would be the same. And, if only one were built now, who is to say that another one or more would not be built in the future?

Since nothing similar to the proposed design in terms of scale and adverse impact exists in the area, its addition would be profound, particularly on Page Circle. Its negative impact on the area would be especially damaging because it would forever destroy a wonderful, unique

neighborhood of smaller residences only to be replaced by another very large complex – one better suited for a large, major urban city center.

On a personal note, my wife and I lived at 429 Page Circle in 1969-71 when we were newly married and finishing our undergraduate degrees at OU. We thoroughly loved living in that little house and still have fond memories of that time. This wonderful, unique, tree-lined neighborhood should be preserved, perhaps as an historic district. Once destroyed, it can never be recreated.

The above reasons provide more than sufficient grounds to forever deny these ill-conceived, extreme megaprojects.

If you have any questions, feel free to contact me at your convenience.

Sincerely,

Hild Man.
Hilding Gene Swanson

President

Cc: Terry Floyd, Development Coordinator

Hilding Gene Swanson, selected facts

Born in Norman, OK

As a kid, I lived at 823 Monnett (corner of Monnett & McCullough) and 504 E. Boyd (corner of Boyd & Classen), so I am very familiar with the area proposed for rezoning and redevelopment

NHS Alumnus Married in Norman, OK BS, Engineering, University of Oklahoma, 1970 MBA, Finance, University of Oklahoma, 1978 PhD, Finance, University of Oklahoma, 1988

Professional experience in residential and heavy construction Faculty positions at Cornell University and Johns Hopkins University Principal in Rayco Investment Corp., dba Ray Apartments, since 1970s