



March 6, 2020

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Williamson County Commission
Williamson County Regional Planning Commission
1320 W Main Street
Franklin, TN 37064

Re: Williamson County 2040 Comprehensive Land Use Plan (the "Plan")

Harpeth Conservancy is a science-based conservation organization whose vision is clean water and healthy ecosystems for rivers in Tennessee championed by the people who live here. Since 1999, for 20 years, we have employed scientific expertise and collaborative relationships to develop, promote and support broad community stewardship and action. The Harpeth Conservancy has over 2000 members and donors, many of which live and work in Williamson county. We have worked on planning and development that has included an EPA grant with Williamson County and the city of Franklin as partners along with two developments to design stormwater management that was customized to the varying growth plans to meet water quality improvement goals.

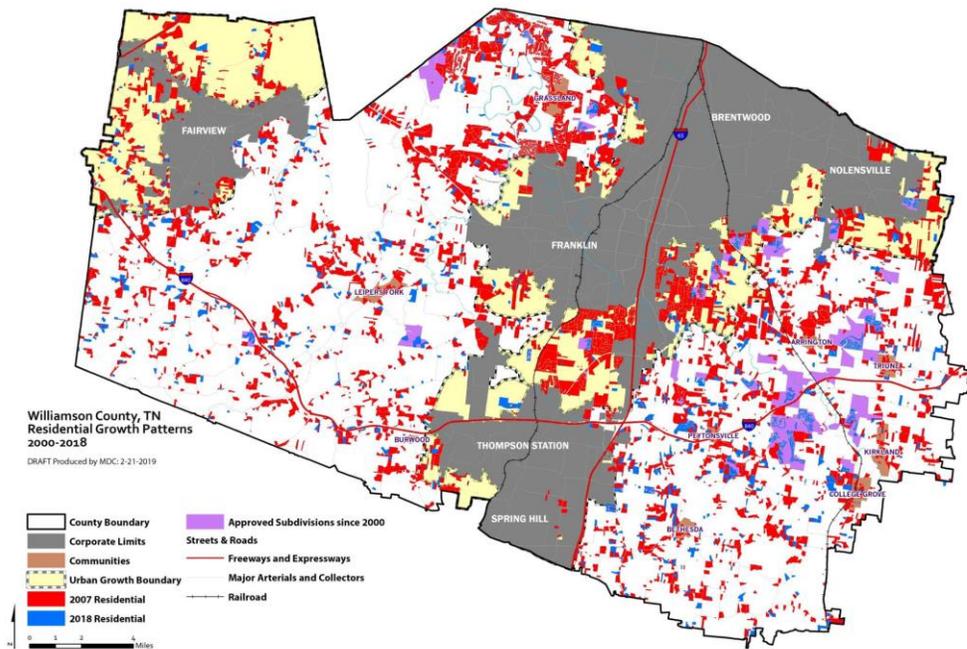
We applaud the efforts of Mayor Rogers Anderson, Planning Director Mike Matteson and the many county commissioners and others involved in their hard work in reviewing the past 15 years of development trends and preparing the many recommendations in the Williamson 2040 plan. We urge the County Commission to endorse it and the Regional Planning Commission to adopt it.

As is noted in the draft Williamson County Plan and in other documents and presentations with analysis presented by Mayor Anderson and planning staff, the Williamson 2040 plan will not be able to achieve the goals of rural preservation and working farmland in the county without establishing critical programs that financially incentivize agricultural and rural land uses, developing legal agreements between the county and cities on where annexation occurs into the cities, and clearly defining where infrastructure like sewer and transportation to support high density development occurs and where infrastructure is not permitted or publicly funded.

For Williamson county and the middle Tennessee region to continue to have highly successful economic growth, it is vital to work with cities and other counties to put these multi-governmental programs in place. Otherwise, the recommendations in the plan that the county is able to adopt within its own zoning and ordinances on their own will not be successful to achieve the Williamson 2040 plan goals.

Tennessee’s population is expected to grow by one million by 2040, from approximately 6.8 million in 2018, to 7.8 million in 2040.¹ Much of that growth is projected to take place in the 10 counties of Middle Tennessee, and much of that in the Williamson County area. Williamson County is expected to grow by **149%** from 2018 to 2045, from 220,000 to 548,000 people.²

This has resulted in a dramatic loss of 260,000 acres of farmland since 2002 across Middle Tennessee’s 10 counties³. While the 2007 Comprehensive Land Use Plan had a key goal to preserve the rural character of Williamson County, analysis of the last 15 years of growth shows “hopscotch” high density development in the eastern part of the rural county (shown in the purple, below) versus being focused in the yellow areas near the cities as intended by the Urban Growth Boundary statute. A primary reason, as explained by Planning Director Mike Matteson’s memo of June 3, 2019 to the County Commission, was that the proposed re-zoning to 1 unit to 5 acres proposed in the 2007 plan for the Southeastern unincorporated area of the county was not adopted.⁴



Caption: Williamson County Residential Growth Patterns, 2000-2018. The purple areas in the eastern part of the county show how much of the new residential growth has not been in the cities as the 2007 Comprehensive Land Use Plan Update intended.

The new Plan has several key components that are intended to focus the continued growth into the cities, where infrastructure is focused, to reduce the real loss of working farms and rural character that is a key component to the economic health of

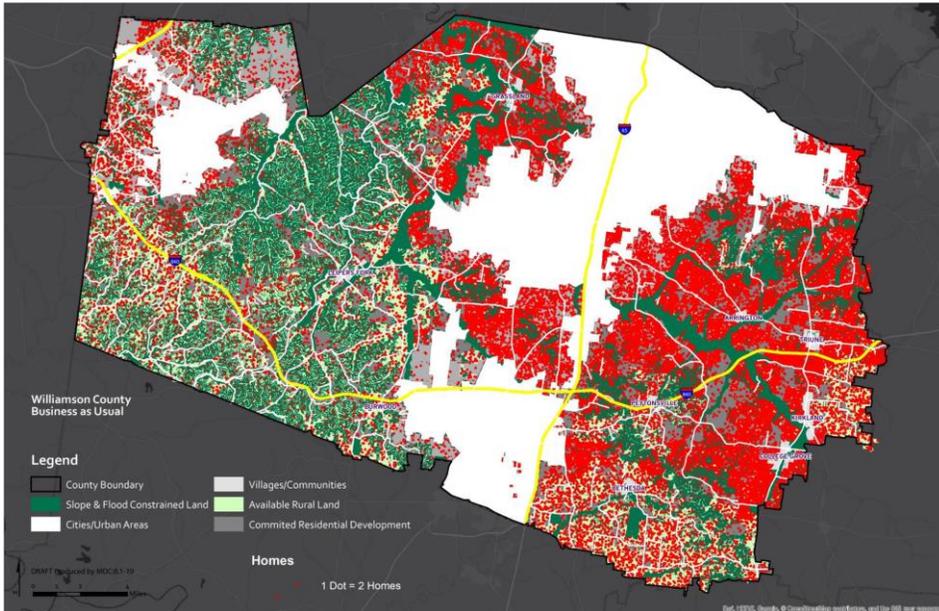
¹ <http://onthehill.tnjournal.net/tennessee-population-projected-to-grow-by-1-million-over-next-20-years/>.

² <https://www.williamsoncounty-tn.gov/DocumentCenter/View/20456/Joint-County-City-Growth-Policy-012920?bidId=>. Rutherford and Wilson counties are also expecting significant growth in that period.

³ https://96a11dc4-790d-4304-88a7-c4780d29a12d.filesusr.com/ugd/4781b5_dfd3844ebf674095a55901282f0c9d49.pdf.

⁴ http://www.harpehconservancy.org/sm_files/June%202019%20Will%20planning%20staff%20memo%20on%20comp%20plan%20update.pdf

the area. The Plan provides maps showing the stark loss of remaining farmland if the Plan's proposed changes are not implemented.



Caption: This map shows the predicted 82,700 new homes across the Southeastern and Northwestern areas of the county without adopting the proposed changes in the Williamson 2040 plan. The plan would reduce the number to approximately 48,400.

Growth such as this does NOT pay for itself.⁵ Williamson County, as of 2018, was over \$650 million in debt, making the County carry the second highest debt load per capita in the state, and that more debt increases could imperil the County's credit rating.⁶ Because new development does not cover its own costs, Williamson County schools are constantly having to search for more funding, including through such methods as property AND sales tax increases, and imposition of impact fees and privilege taxes.⁷

Recent studies that suggest that growth pays for itself are subject to significant question because they, among other flaws:

- Overstate the income of people to the county, thus inflating tax revenues from growth.
- Ignore the costs of growth (while looking only at the "benefits" of growth), such as:
 - Congestion

⁵ See re Nashville, <https://www.tennessean.com/story/opinion/columnists/david-plazas/2020/01/31/nashville-growth-costs-not-paying-for-itself/4597662002/>.

⁶ See, e.g., <https://www.tennessean.com/story/news/local/williamson/franklin/2019/10/15/despite-opposition-williamson-increases-education-impact-fee/3976831002/>, <https://www.tennessean.com/story/news/local/williamson/franklin/2019/06/29/williamson-county-school-funding/1587335001/>.

⁷ <https://www.tennessean.com/story/news/local/williamson/franklin/2019/06/29/williamson-county-school-funding/1587335001/>.

- Sprawl
- Higher housing prices
- Stormwater / flooding / water quality issues
- Do not factor in decreases in tourism due to degradation of the rural character of the County.⁸

Moreover, unplanned and unmanaged growth can interfere with the property rights of County residents by creating traffic problems, over-crowding schools, requiring taxes increases to pay for costs developers don't pay, causing water quality degradation, and causing other quality of life issues.

Williamson County's rural lands and open spaces have real value and increases property values for all County residents. Cumberland Region Tomorrow funded a regional study by Dr. Sims team at the University of Tennessee in 2018, entitled, The Economic Value of Open Space in the Cumberland Region.⁹ According to study that broke statistics out by the counties, open spaces in Williamson County provide:

- Over \$63.2 million annually in total health-related cost savings.
- \$350.6 million in annual cost savings and economic benefits through the provision of vital services such as: water supply, water quality, flood mitigation, wildlife habitat, pollination, air pollution removal, and carbon sequestration.
- Over \$367 million in annual revenue from agriculture and forestry, which supports over 2,800 jobs.
- Generate \$692.8 million in tourist output, many of whom come to enjoy the beauty of our open spaces and rural lifestyle, which supports 3,000 jobs in the County.
- Increase the total value of the housing stock in Williamson County by \$1.15 billion.

These benefits flow not only from proximity to forests, wetlands, agricultural lands, shrub-scrub, and developed open space, but also from large residential lots.

The new Plan is not the entire solution to preserving real farmland or to address growth pressures related to traffic, schools, and sewer infrastructure, but it is an important next step. The new Plan also highlights other key needs that must be addressed to make working farms and rural character an equal priority in the region. These include:

- Creating a task force to develop an agricultural protection program,
- Updating conservation subdivision regulations, and

⁸ Email available upon request.

⁹ <https://www.cumberlandregiontomorrow.org/openspace>.

- Enhancing and maintaining meaningful urban growth boundaries between the cities and county and agreements needed for regional financing of infrastructure needs.

We support such efforts and believe the County should also consider other ways to support rural preservation and agricultural production by such things as:

- Supporting local farm-to-table programs,
- Providing offsets / payments to farmers for enhancing our area and providing necessary services,
- Requiring that efforts to mitigate the effects of development be done locally, with fair payments for mitigation efforts,
- Transfer of development rights.

Harpeth Conservancy has a long history of being involved and providing expertise to and working with decision-makers, business leaders, landowners and others to integrate approaches that improve water quality and quality of life into numerous land use plans, local ordinances that shape development design, and more. We worked actively with Mary Brockman, former County Commissioner of the 9th district, and over 50 large property owners on the first voluntary down-zoning efforts in the County in the Harpeth River Valley along Old Hillsboro Road in 2012.¹⁰

We appreciate all the hard work that went into the Plan and look forward to working with County leaders, business leaders, agricultural land owners, citizens and other stakeholders who deeply care about the future of the county and the region to formulate and implement the tools necessary to make the recommendations in the Plan a success.

Sincerely,



Dorie Bolze
Harpeth Conservancy
President & CEO

¹⁰ http://www.williamsonherald.com/communities/article_9816585e-c4e1-11e3-9495-001a4bcf6878.html