

Dorie Bolze

From: Dorie Bolze
Sent: Thursday, June 24, 2021 3:10 PM
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Subject: Extensive Harpeth floodplain alteration in Brownland Farm/CCC proposal- Items 6-8 on Franklin Planning Commission tonight
Attachments: Harpeth Conservancy letter to PC re Brownland Farm proposal- Aug 25-2020.pdf

Dear: Franklin Municipal Planning Commission
Franklin Board of Mayor and Aldermen
Eric Stuckey, Vernon Gerth, Planning and Engineering Staff

RE: EXTENSIVE FLOODPLAIN Alteration of Harpeth at Brownland Farm/CCC- items 6—8 on 6/24 Franklin PC agenda

At the August 2020 Planning Commission meeting, Harpeth Conservancy provided input, data in the form of photographs and video of flooding in the vicinity of this proposed development, and recommendations. These are below and attached. The proposed development plan and zoning, items 6-8, continue to rely on extensive floodplain alteration, including fill of a floodway in a uniquely challenging area of the Harpeth river with respect to flooding.

Harpeth Conservancy supports the staff recommendation to deny this proposal because the extensive alteration of the floodplain does not comply with the Conservation Design Concept in Envision Franklin that applies to about 85% of the property which is in the floodplain. The conservation design concept “*contemplates as little development as possible in order to protect sensitive land and environmental features*” such as floodplains. “*The preservation of floodplains has a direct public safety purpose and helps to minimize property damage during periods of flooding. Disruption should be limited to preserve the form, function and character of the area.*” (p. 32).

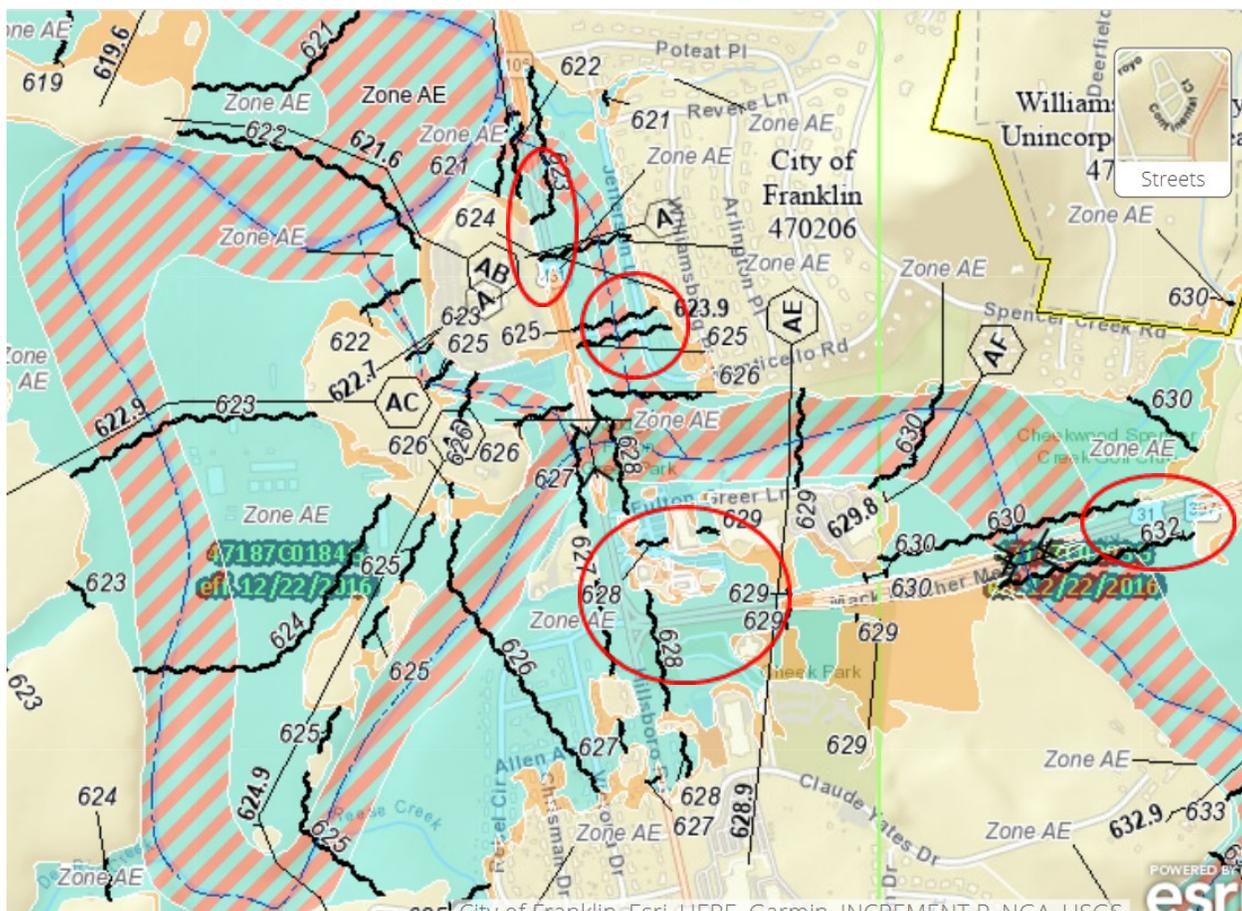
Essentially the proposed residential development plans involve too extensive alteration of the floodplain and is not able to address the existing safety issues with flood waters covering portions of every road that could be used to get in and out of this proposed development in this unique river bend of the Harpeth. Some new maps are provided below while others are in the email form last August that is below this one.

We are supportive of the property owners who are interested in developing this property. It might be that a different design concept from conservation subdivision to one that is not predominantly residential would be more appropriate in this area to reduce the safety concerns tied to the existing flooding constraints in the area. This would mean an

amendment to Envision Franklin for a different vision for this area than high density residential within a flood prone area.

Below are some details and maps of two key points:

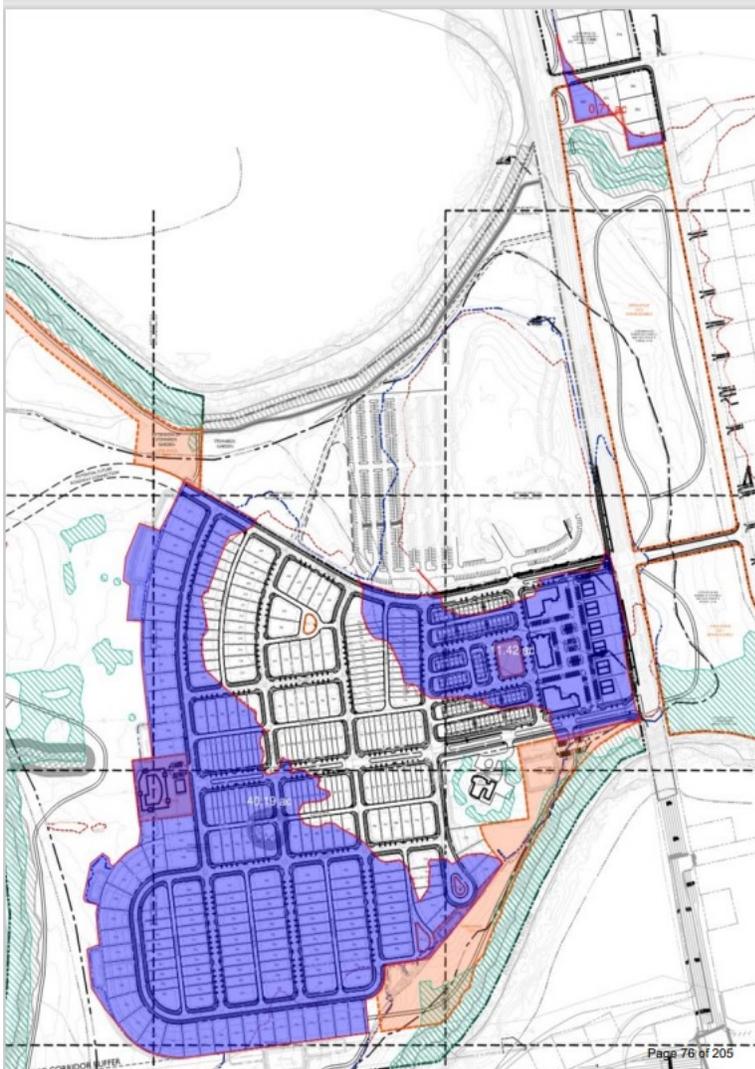
1. SAFETY ISSUES RELATED TO FLOODWATERS ARE AN EXISTING LIMITATION, especially for high density residential in this area.
 - The city has to sign off on any floodplain alteration proposal that is then sent to the state and/or FEMA for review. This sign-off states that states the city believes that public safety can be protected. This seems unlikely to be met. This proposal will require both state and federal review.
 - While the development proposal will build interior roads and elevate houses to comply with city and federal rules, the floodplain alteration proposal does NOT reduce any current existing flood risk on the Hillsboro Road, Jefferson Road (Monticello), and Mack Hatcher Parkway. So residents in the subdivision can experience times when they cannot get in or out until flood waters recede.
1. The current roads in the area DO NOT meet the city's requirements that "existing roadways, and critical service roads (Hillsboro and Mack Hatcher) not be inundated by more than 3 inches over one-half roadway width under a 100-year flood event." See map with RED CIRCLES around 100 year floodplain waters on these roads.



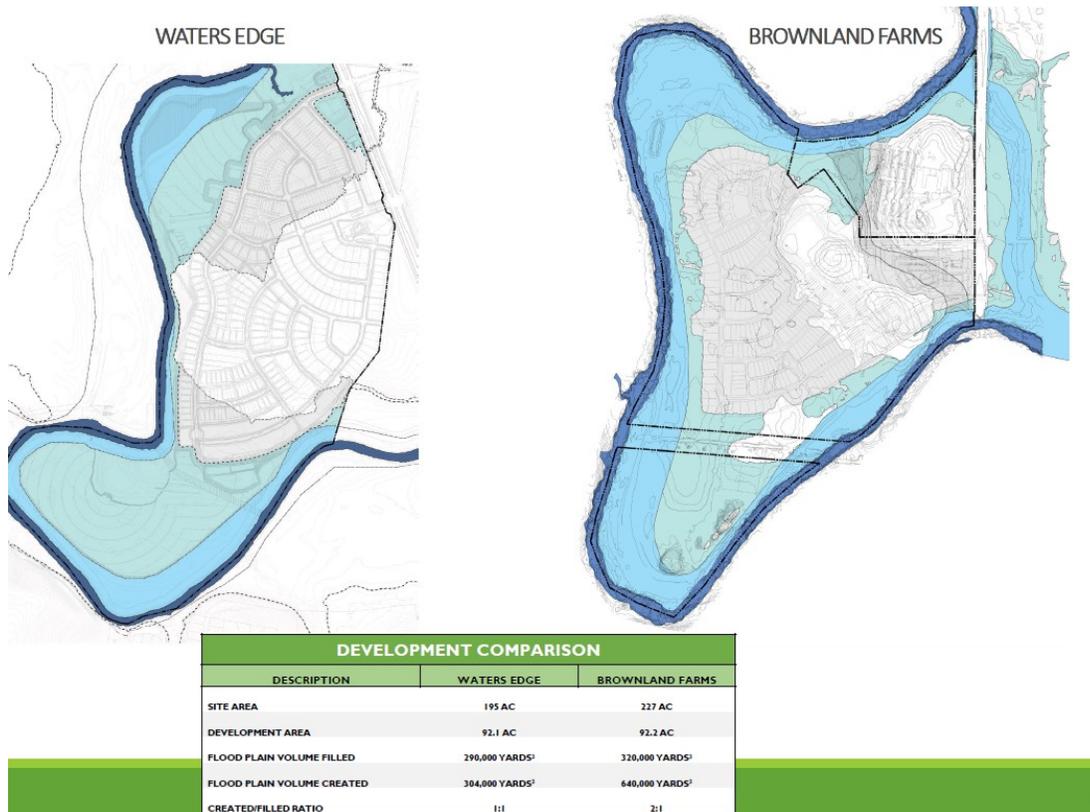
FEMA map showing 100-year floodplain (blue), floodway (orange hatch/blue), and 500-year floodplain (orange). Red circles mark all roadways with floodwaters at 100-year floodplain event. These block getting in and out of the proposed development in Brownland/Church of Christ with both entrances to the proposed development located between the two circles on Hillsboro Road.

2. THE FLOODPLAIN and FLOODWAY ALTERATION IS EXTENSIVE;
 - Of over 220 acres less than 15% is outside of floodplain and floodway!

- This is the most extensive floodplain alteration proposal the city has seen in many years and is affecting a large natural floodplain and floodway area of the Harpeth.
- The acreage of alteration is more than 52 acres shown on the city staff map provided (p. 76). The purple (see map below) is just the FILLED area. The fill is coming from excavating dirt from the floodplain to the south of the developed area. More acreage is being altered than the 52 fill acres.



- The floodplain alteration proposal will remove the ability of this area of the Harpeth to let flood waters spread out and slow down. The proposal as I understand it from the site visit last week with the development team is to reshape the natural elevations in this whole bend in the river. I understand there will be several feet of excavation down into the natural floodplain to build the “storage” and use this dirt for the fill for the purple areas. This means the loss of the extensive shallow floodplain that slows water down. Slowing floodwaters down is one of the KEY FUNCTIONS OF A FLOODPLAIN that is being removed.
- This proposal is much different from the floodplain alteration at Waters Edge by the same developer on the Harpeth upstream of downtown: 1) There was no floodway alteration at Waters Edge. 2) Waters Edge has major roads not in the floodplain so there is not a safety issue.



- The development plan proposes to alter the 100-year floodplain so that it runs UP TO THE BACKYARDS of most of the outer lots (Blue line on map C 2.6). This leaves little room or margin of safety, especially with the increased high intensity rain events that this part of the country is experiencing from climate change.
- Floodplain and Floodway lines are not permanent, non-changing lines. These are PROBABILITIES and do not factor in climate change driven increasing rain events such as the March 28 flooding.
- There are HIGH DENSITY RESIDENTIAL DIVISIONS along this section of the river and just downstream that were not built with the latest floodplain and stormwater regulations or latest floodplain mapping information. This proposal pushes to the edge of the mathematical models and does not help to reduce risk in the immediate area and downriver in the city and county. Developments include REBEL MEADOWS, RIZER POINT, MONTICELLO, FIELDSTONE FARMS, in FRANKLIN and COTTONWOOD, and RIVER LANDING in the county.



This is a complicated area of the Harpeth River with existing flooding constraints on major arterial roads. A development in this area is possible, but not with this extensive floodplain alteration and will likely need to be something that is different from the current Envision Franklin land use plan. Let us know how the Harpeth Conservancy can help the city, property owners, and community with determining the future of this area of the Harpeth.

I have a personal affinity for this area of the Harpeth as my daughter has completed in horse shows out on Brownland Farm. It has been a wonderful equestrian center for so many years. The Andertons have provided an incredible asset to Franklin. They are ready to move to their next chapter in life. We want to be a part of helping them with that while also ensuring the safety of the community. Our priority is to ensure that the increasing flood risks are built into development plans for this and others in this important area of the Harpeth that has high density residential neighborhoods built with older requirements that need to be considered beyond the narrow requirement to not elevate the floodway elevation in the vicinity.

Again, below this email is the one sent in August 2020 with floodplain maps, videos and photographs. Also attached are our comments from provided to the record in August with more detail on some topics such as data on the increasing flood risks for this region of the state.

Sincerely,

Dorie Bolze
President and CEO



Dorene Bolze
President/Chief Executive Officer

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From: Dorie Bolze

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Subject: Input on Plan Amendment and Floodplain alteration proposal for Brownland Farm on Harpeth-- item 4 on PC agenda for August

Dear Franklin Planning Commission
Franklin Board of Mayor and Aldermen,
Eric Stuckey, Vernon Gerth
Planning and Engineering Departments

The Harpeth Conservancy has been interested in the floodplain alteration proposal that is the foundation of the Plan Amendment proposal for higher density concepts for Brownland Farm that lies in a bend in the Harpeth River just north of downtown Franklin. This proposed plan amendment is based on a significant alteration to the natural floodplain and floodway channels in this unusual bend in the Harpeth that creates unique constraints for traffic, flood management, and public safety. There are complex issues in this proposal for this area of the Harpeth which is reflected in this proposal being deferred two times since June. We appreciate the time the city's planning and engineering staff have spent to provide us with input on the city's review process. We have also reached out to the community and to state and federal experts on floodplain alteration review processes to understand this proposal. We also appreciate the time that Kevin Estes at Land Solutions, Barge Design Solutions and Greg Gamble provided in late July to discuss their floodplain alteration concepts with us.

Please find attached our letter to the Planning Commission with our thoughts, recommendations, and information that we have provided to the city's staff that we hope will be useful in the city's deliberations on not just

this proposal, but the larger issue of floodplain management and flood resiliency planning. Also here is a [link to the page on our web site](#) with more photos, video and documents that are referenced in this letter as well.

Harpeth Conservancy believes that this Envision Franklin plan amendment for higher density for this flood constrained river bend needs to be turned down. We support the staff concerns for traffic, public safety and emergency response because of the environmental constraints of the river and Hillsboro Road and lack of other access for people to get in and out of this area. This area was extensively flooded in 2010 including on Hillsboro Road. The maps from FEMA below show clearly that this area is completely surrounded by floodway which leaves the higher ground in the bend of the river isolated as an island until access out of flood waters is provided from the West as well as flooding issues along Hillsboro Road are addressed.





The first photo above is at the site in Monticello at Hillsboro Road and Poteat Place where the floodway called the “East Split” on the FEMA map covered Hillsboro Road. Across the street is Christ Community Church. There is also a [video](#) linked on our web site that shows the swift moving water during the flood over Hillsboro Road. The staff asked us to see if we could find images on the ground of flooding along Hillsboro Road that corroborates the FEMA maps. We reached out to people in the community who found numerous images on facebook. The other two photos show the second floodway that starts at the Brownland Farm entrance and the extensive flooding on the farm’s show grounds.

The floodplain alteration proposal is extensive and involves filling one of the floodways and extensive cuts along the main river that will substantially change the natural floodplain. During the joint BOMA and Planning Commission meeting in July when the developer/applicant presented an overview of this proposal, Planning Commissioner Roger Lindsay noted that this could be the first significant floodplain and floodway cut and fill proposal the city has seen in recent times. The process of the state and federal FEMA review of this proposal will take several months and will involve outside expert review from the engineering firm, AECOM, that did the work with the federal agencies to update the FEMA floodplain maps for the Harpeth. As of last week, we understand that the developer’s floodplain alteration proposal has not been submitted to the city staff. This submittal starts the formal state and federal review process.

We understand that there are more of these floodplain alteration proposals around the state each year and that the expert review process has been valuable in revising and correctly problems in the proposals. It doesn’t seem appropriate to consider a plan amendment that would establish entitlements that cannot be used if the floodplain alteration proposal they are based on have not been reviewed and approved by the state and national FEMA review process.

The proposed floodplain alteration concept includes removing 64.2 acres from the floodplain based on the applicant’s presentation in the August Planning Commission package. The reduction of over 25% of the floodplain on the property goes counter to the city’s Conservation Design Concept that applies to all the floodplain in [Envision](#)

[Franklin](#). The Conservation design concept “contemplates as little development as possible in order to protect sensitive land and environmental features” such as floodplains. “The preservation of floodplains has a direct public-safety purpose and helps to minimize property damage during periods of flooding. Disruption in any Conservation area should be limited to preserve the function, form, and character of the area.” (p. 32).

The May 2010 flood was caused by two intense rain events that set new historic records for the Nashville region. The entire Harpeth River flooded with the all-time rainiest day and third rainiest day coming back to back on the weekend of May 1 and 2. We have details of various analyses on [our web site](#). The press coverage of the May 2010 flood has extensive aerial footage of the flooding of residential sections in Monticello, Fieldstone Farms, Cottonwood and River Landing. We have photos of the flooding in this bend in the river on the farm and church as well as these aerials from the press.

The floodplain maps were updated for the entire Harpeth several years ago after the May 2010 flood. However that work and FEMA models used to propose changes to the floodplain DO NOT include projections of increased rainfall intensity that is occurring in this area from climate change. Nor do FEMA requirements incorporate targets to reduce downstream properties from the 100-year floodplain. New flood prediction models, called [Flood Factor](#), received national coverage (see story in [the New York Times](#)) and front page coverage in the [Tennessean](#) in early July this year with their focus on how to incorporate climate change predictions into FEMA’s work.

The city has updated and added important additional requirements for new construction so homes are elevated above 100-year flood levels and additional requirements to account for some of the increased flood volume. However, the city does allow cut and fill in the floodway and floodplain in its stormwater ordinance. With the intent of Envision Franklin to preserve the function and form of floodplains by calling for limited disruption, the city will want to review how to limit the use of cut and fill in the floodway and for what purposes, such as limiting it to rectifying an existing man-made flooding condition.

At the same time as this plan amendment proposal for higher density development for Brownland Farm is the proposed annexation of the 58-acre Campbell property for a residential subdivision in the middle of rural land. The proposal is adjacent to the Gentry and Short farms, both TN Century Farms, and two home sites listed on the National Register of Historic Places that are north of Highway 96 West near the West Harpeth. We support the Heritage Foundation’s recent recommendation as well for the city to not annex the Campbell property at this time.

Both of these development proposals highlight the need for a special plan for this last rural area of Franklin. This Northwest quadrant, from Brownland Farm in the East to Gentry Farm in the West north of highway 96 West, contributes greatly to the historic agricultural heritage of the city and county. As several aldermen noted in a recently discussion on the major thoroughfare plan for this rural area, “this area needs a different feel” from West Haven and “we need to go back to the drawing board on how to get this area developed more in keeping with the area North of 96.”

This updated plan would honor and invest in the historic and rural character that includes the deep history tied to the equestrian industry in Franklin, Williamson county and the region. This special plan also needs a specific floodplain risk reduction and resiliency plan that addresses current made-made flooding and reduces the risk to current property owners from flooding in the city and county downstream of downtown Franklin. There needs to be an intentional effort to have new development upstream in a floodplain reduce the number of existing properties in the floodplain that now have increased flood risk from the pattern of prior development and earlier requirements. Just like the city and county requires new development to provide funds through various means to cover costs of roads, schools, sewer and drinking water upgrades, any floodplain alteration plan needs to specifically analyze how it will reduce existing flood risk that is in this high density residential area of the Harpeth.

We would like to work with the city, county and agencies on a floodplain resiliency plan for the Harpeth River and West Harpeth river from downtown Franklin to Highway 100 Davidson county line as a key need for any future development in the rural Northwest quadrant of Franklin. A floodplain resiliency plan would have a goal to reduce

property in the 100-year floodplain in subdivisions like Rebel Meadows, Fieldstone Farms, Monticello, Cottonwood, River Landing and others that were designed under prior rules and conditions. A floodplain resiliency plan needs to include climate change predictions to prevent future flooding, address current flooding caused by man-made conditions (such as roads, bridges, culverts and older development requirements), and protect the natural river floodplain by limiting cut and fill. Designing resilient communities is planning for the future and is a major lesson from the May 2010 flood, especially as this region continues to grow.

Sincerely,

Dorie Bolze



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President/Chief Executive Officer

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