



City of Franklin

Mailing Address:
109 3rd Ave S
Franklin, TN 37064
(615) 791-3217

Meeting Agenda

BOMA & FMPC Joint Conceptual Workshop

Thursday, April 24, 2025

5:30 PM

Williamson County
Auditorium

MEETING LOCATION

Williamson County Auditorium
1320 West Main Street

Notice is hereby given that a joint, non-voting workshop of the Board of Mayor and Aldermen and the Franklin Municipal Planning Commission will be held on the date, time and in the location stated above. Additional information can be found at www.franklintn.gov/planning. For accommodations due to disabilities, contact the Human Resource Department at 791-3216, at least 24 hours prior to the meeting.

The typical process for discussing an item in this workshop setting is as follows:

- 1. Applicant / staff presentation, and*
- 2. BOMA and FMPC comments*

CALL TO ORDER

NEW BUSINESS

1. (5:30 - 5:45 PM) Zoning Ordinance Update Potential Topics: Halo Signs
2. (5:45 - 6:30 PM) Zoning Ordinance Update Potential Topics: Cumulative Timeframe in the Floodplain

OTHER BUSINESS

ADJOURN

Zoning Ordinance Update
BOMA/FMPC Topics
Halo Lighting



Joint Conceptual
Workshop
April 24, 2025



Halo Lighting

- Described as: A source of illumination, not directly visible, lighting only the background upon which the individual letter is mounted.
- Current ZO regulations do not allow for halo lighting. Property owner would have to get rezoning and MOS to allow for halo lighting.
- Other communities that define and permit Halo lighting:
 - Gilbert, AZ
 - Chattanooga, TN
 - Henderson, NV
 - Plymouth, MA

Halo Lighting Potential ZO Amendments

- Define halo-lighting
- Provide any additional clarity on external, internal, indirect illumination standards
- Identify areas where Halo Lit signs may or may not be appropriate

Staff will do additional research with these potential amendments if BOMA and FMPC wish to proceed.

Floodplain Substantial Improvement and Substantial Damage Requirements

Tom Marsh, Director Building and Neighborhood Services
Alex Brown, Assistant Director Development Services
Shanna McCoy CFM, Zoning and Floodplain Administrator
William Holcomb CFM, Zoning Enforcement Planner



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April 24, 2025

Agenda

1. Reasons for regulations
2. Statistics
3. National Flood Insurance Program (NFIP) Regulations
4. Context and Background
5. Benefits of Floodplain Regulations
6. Reducing the SI/SD Threshold
7. Benefits of Reducing SI/SD
8. Drawbacks to Reducing SI/SD



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Reasons for Regulation

1. To protect human life, health, safety and property.
2. To minimize expenditure of public funds for costly flood control projects.
3. To minimize the need for rescue and relief efforts associated with flooding.
4. To minimize prolonged business interruptions.
5. To minimize damage to public facilities and utilities such as water and gas mains, electric, telephone and sewer lines, streets and bridges located in flood prone areas.
6. To help maintain a stable tax base by providing for the sound use and development of flood prone areas to minimize blight in flood areas.
7. To ensure that potential homebuyers are notified that property is in a flood prone area.
8. To maintain eligibility for participation in the NFIP.



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Statistics

- The State of Tennessee has had 19 flood related presidential disaster declarations.
- Since 2022, Tennessee alone, has had 17,088 claims.
 - 4,442 being repetitive loss claims and \$445,688,108 in paid claims.
 - This information does not include the most recent flooding events in East TN with Hurricane Helene, Clarksville or flooding just two weeks ago.
- The NFIP currently owes the United States Treasury over \$20 billion because the number of claims being paid do not balance with insurance premiums.
- When homes are brought into compliance, the number of claims and the amount paid out on those claims drastically decrease.
- The overall goal is to create vibrant, sustainable homes and businesses that will not be devastated in flood events and reduce the risk to life and property.



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Key NFIP Regulations

- Per 44 CFR 60.3(b)(1) and the City of Franklin Zoning Ordinance: “Require permits for all proposed construction and other developments including the placement of manufactured homes, within Zone A on the community's FHBM or FIRM.”
- 44 CFR 59.1 and the City of Franklin Zoning Ordinance, define “development” as any man-made change to improved or unimproved real estate, including but not limited to buildings or other structures, mining, dredging, filling, grading, paving, excavation or drilling operations or storage of equipment or materials.
- If a community starts exempting certain development activities from floodplain permitting, the community is no longer in compliance with the NFIP.
 - Doing this can lead to probation and ultimately suspension from the NFIP.

Context and Background

- The City of Franklin participates in the Community Rating System (CRS), a voluntary incentive program that recognizes and encourages community floodplain management practices that exceed the minimum requirements of the National Flood Insurance Program (NFIP). Over 1,500 communities participate nationwide.
 - 12 in the State of TN.
 - 1 is rated at a 6.
 - 9 are rated at an 8.
 - 2 are rated at 9.
 - The City of Franklin and Williamson County are both rated at an 8.

Context and Background

- One of the credits the City of Franklin receives for scoring in the CRS is for the adoption of a 5-year cumulative tracking of substantial improvement and substantial damage (hereafter SI/SD).
 - The City, specifically Building and Neighborhood Services, monitors the dollar amount of improvements either done voluntarily, or necessary repair after damage.
 - If at any point over 5 years the value of work equals or exceeds 50% of the structure value only, then the structure must be brought up to currently adopted floodplain requirements.



Benefits of Floodplain Regulations

- The City of Franklin has achieved Class 8 in the Community Rating System. (1,000-1,499 CRS Credit Points)
 - Property owners that have flood insurance receive a 10% discount on premiums. (5% for every class rating under 10)
- Currently the City has 1334 CRS Credit Points.
- There are certain minimum requirements for each class, regardless of cumulative points, such as for class 8:
 - maintain at least a 90% accuracy rating for its construction elevation certificates every year.
 - A minimum of 1' of freeboard regulation is required.
- Floodplain regulations exist for new construction and SI/SD thresholds and are designed to bring non-conforming structures into compliance over a period of time.
- Floodplain compliant homes are statistically more flood resilient and less likely to incur expensive damages in a flood event.



Reducing the Cumulative SI/SD

- Currently The City of Franklin has Substantial Improvement/ Substantial Damage tracking that is cumulative over a 5-year rolling period (after 5 years, a project falls off from tracking).
- The minimum requirement is that SI/SD is tracked over a 1-year rolling period. This is a FEMA minimum standard.
- The 5-year cumulative SI/SD is worth 90 CRS points. With our current scoring, this threshold could be lowered without effecting our CRS class rating.
- Important to note that over the past 3 years, we have not had any homes trigger SI/SD using this metric.
- We have had many homes come into full compliance via teardown/rebuilds, Army Corps uplift grants, and LOMR.



Benefits of Reducing SI/SD

- Make home improvements and renovations easier on citizens.
- Make tracking easier and less burdensome on City staff.
- Allow for homes to be improved over a shorter period.
- CRS score would still be high enough to maintain a Class 8 rating (1000-1,499 CRS Points), leaving homeowner insurance rates unaffected by this change.
 - Results from an ISO/CRS Audit on March 27, 2025 shows we have 1334 CRS credits Cumulative SI/SD is worth 110 Points Maximum.



Drawbacks of Reducing SI/SD

- Homeowners will piecemeal their major projects over a longer period to avoid the 1-year cumulative mark.
 - This will lead to construction projects dragging out longer than needed.
 - This will also lead homes to remodel over a larger period to avoid reaching full floodplain compliance, leading to expensive homes that are subject to flooding with significantly less resilience.
 - Flood insurance coverages cover up to \$250,000 of flood damage, and content policies cover up to \$100,000 of flood damage.
 - The average home price in Franklin according to Zillow is \$873,782, including land.
- Less compliant structures in the floodplain lead to higher claim amounts and a greater burden on the NFIP and insurance companies.
- Potentially increase the number of emergency rescues during a flood event.
- Loss of Community Rating System Credits



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Questions and Guidance