

September 15, 2015

TO: Franklin Municipal Planning Commission

FROM: Amanda Hall, Preservation Planner c/o Franklin Historic Zoning Commission

SUBJECT: Recommendation for Consideration of Ordinance 2015-53, "Minimum Lot Frontage Requirements for Residential Detached"

Purpose: The Franklin Historic Zoning Commission (HZC) respectfully requests that the Franklin Municipal Planning Commission consider favorable recommendation of the proposed Ordinance 2015-53, "Minimum Lot Frontage Requirements for Residential Detached."

Background: Increased infill development within the Central Franklin area has prompted the City to create an Infill Working Group to provide guidance to the staff in respect to neighborhood context and transitional features. One specific concern is the creation of new infill lots with incongruent lot frontages. The HZC has consulted the Executive Director of the Tennessee Historical Commission and State Historic Preservation Officer, E. Patrick McIntyre, Jr., to provide comment on the subject. The attached letter, dated August 27, 2015, notes that the increase of infill structures within National Register Historic Districts may compromise the balance between contributing structures (those that are fifty years old or older and retain their historic features) and non-contributing structures (those that are less than fifty years old or older buildings that have been substantially altered). If National Register Historic Districts undergo too many changes, they may lose eligibility for listing.

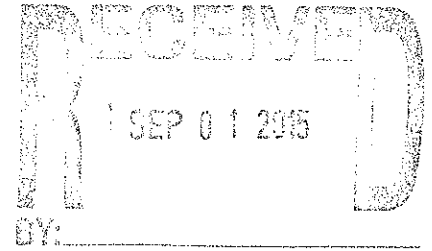
National Register Historic Districts are listed on the National Register of Historic Places (NRHP), the federal government's official list of places worthy of recognition and preservation. In addition to the honorific status placement on NRHP provides, listed properties may also be eligible for federal preservation tax credits. All listed properties are afforded additional protections, as any potential federal projects within the vicinity of the properties must undergo Section 106 Review by the State Historic Preservation Office and the Advisory Council on Historic Preservation. The City of Franklin hosts seven historic districts, four of which are listed on the NRHP:

- Adams Street Historic District
- Hincheyville Historic District
- Lewisburg Avenue Historic District
- Natchez Street Historic District

Recommendation: The HZC requests that the Franklin Municipal Planning Commission recommend approval of Ordinance 2015-53 to the Board of Mayor and Aldermen since the adoption of a minimal lot frontage will maintain the character of the historic districts through the reinforcement of the traditional lot widths, curb cuts, and building siting and orientation.



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August 27, 2015

The Honorable Ken Moore
Mayor, City of Franklin
109 Third Avenue South
Franklin, Tennessee 37064

Dear Mayor Moore:

Mary Pearce of the Heritage Foundation asked the State Historic Preservation Office to comment on the subject of flag lots being approved in Franklin's National Register-listed historic districts. My understanding is that these lots allow new construction of any size to be erected on individual lots within the districts. If this construction is larger than the historic resource on the lot, it changes the sense of time and place in the district—a key defining characteristic. New construction also introduces a non-contributing resource into the district. If there are too many non-contributing resources--or more non-contributing resources than contributing-- the district may be removed from the National Register, as it no longer meets the criteria for which it was listed.

Historic districts are listed in the National Register of Historic Places for their architectural and/or historic significance. A National Register district is typically composed of resources (generally houses or commercial buildings) that are fifty years old or older and retain their historic features, including materials, design, and workmanship. These resources are considered contributing to the character of the district. Districts also contain non-contributing resources--those that are less than fifty years old, or older buildings that have been substantially altered.

Sometimes a National Register listed historic district undergoes so many changes that it ceases to meet the National Register criteria, and at which point it is no longer eligible for listing. This is a concern with the flag lots in Franklin's historic districts. I know that Franklin-- a community recognized across the nation for its stewardship of its historic neighborhoods—does not want to erode the character of this special city, and so that is why I am reaching out today. Thanks for your consideration, and please do not hesitate to contact me any time our office may be of service to you.

Sincerely,

E. Patrick McIntyre, Jr.
Executive Director and
State Historic Preservation Officer

Cc: Amanda Hall, Preservation Planner, City of Franklin
Eric Stuckey, City Administrator, City of Franklin
Mary Pearce, Executive Director, Heritage Foundation