



# CITY OF CHARLESTON PLANNING COMMISSION

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## PUBLIC COMMENT MARCH 23, 2023

A special meeting of the Planning Commission will be held on **Thursday, March 23, 2023** at **5:00 p.m.** in the **second floor auditorium of the Charleston County Main Library**, located at 68 Calhoun Street.

The following comments will be provided to the board members 24 hours in advance of the meeting. The comments will also be acknowledged into the record and summarized. The public is encouraged to attend the meeting in person to speak in order for comments to be fully heard.

For additional information, please visit [www.charleston-sc.gov/pc](http://www.charleston-sc.gov/pc) or contact:

**DEPARTMENT OF PLANNING, PRESERVATION & SUSTAINABILITY**  
**2 George Street, Suite 3100, Charleston, SC 29401 | 843-724-3781**

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### 26 Comments Submitted

- **Valerie C., Charleston, SC:**

*Submitted on Innovation website Mar. 15, 2023 3:28 PM*

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An interesting perspective on waterfront development that is mostly residential and walking paths/parks <https://www.youtube.com/watch?v=7EYf-S5yTEk> "Boring" Do we want Union Pier to be all multi-million dollar condos along a passive park that's boring, dark and unsafe at night? Union Pier should be a beautiful open place that has relaxing parks and walking paths but also shops and restaurants and activities along the water that is vibrant and fun and safe and interesting at all times of the day and night for everyone. We don't need more late night bars like upper King St, but I think a lot of thought and brain storming should go into designing the waterfront to be more than just a park, but a public area that stimulates life and culture.

- **Benjamin Cruzan, Charleston, SC:**

*Submitted on Innovation website Mar. 15, 2023 12:06 PM*

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It's been said already many times, but it's worth repeating, this is a once in a generation opportunity for the city of Charleston and it's people, and even the world. Charleston is a unique and historic city that this project must not only reflect, but also improve and enhance. For a city that is surrounded by water, it too often feels disconnected from the waterfront. Easy and Natural access and pedestrian flow to the Union Pier Waterfront must be a priority. The design should include a wide Promenade Park leading from city center to a wide open public plaza on the waterfront. The north end should connect seamlessly to Liberty square and the aquarium, and the south end to Joe Riley waterfront park. Charleston has a couple waterfront parks, but they don't feel like a place to BE, merely a place for a nice stroll. Social spaces, Art, Activities, and Restaurants should be included in the plan. Downtown Charleston has one single restaurant on the waterfront, and the views of the water from it leave a lot to be desired. A "restaurant row" should be included in the plan, not just large, expensive ones, but also small quaint eateries or pop-ups with plenty of outdoor water views. It might be helpful to partner with other organizations that study public space such as the Project for

Public Spaces. Charleston is a waterfront city that currently isn't. The Union Pier project is the opportunity to fix that. <https://www.pps.org/> <https://www.pps.org/article/greatwaterfronts>  
<https://www.sociallifeproject.org/pop-up-waterfront-restaurants/>  
<https://www.sociallifeproject.org/capitalizing-on-the-appeal-of-waterfronts/> Make Charleston's Union Pier Waterfront not just Great. Make it Iconic! Make it Charleston.

- **Brian Turner, 147 King Street:**

*Submitted via email and on Innovation website Mar. 20, 2023 5:12 PM*

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See attached letter.

- **Avery Kepple, 37 Hasell Street:**

*Submitted on Innovation website Mar 21 2023 2:53PM*

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I would like to understand how this development will affect stormwater and drainage in surrounding neighborhoods. Specifically, will this development (improve, have no affect, or increase) drainage issues on east bay street?

- **Peter Stockman, 12 Airy Hall, Johns Island, SC 29455-5720:**

*Submitted on Innovation website Mar. 21, 2023 4:35 PM*

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The water management measures and the water management best practices described in the City Plan must be made mandatory, rather than optional, in the plan for Union Pier.

- **Kelly Davoren, 5 Gadsdenboro St:**

*Submitted on Innovation website Mar. 21, 2023 5:44 PM*

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I live at The Gadsden (building between Laurens, Concord & Gadsdenboro streets). My neighbors & I are deeply concerned about increased water/flooding to surrounding streets, our street level parking garage & building lobby as Union Pier is developed. How is this concern being provably addressed?

- **Susan Lyons, 7 Gadsden Street, Charleston 29401:**

*Submitted on Innovation website Mar. 21, 2023 5:58 PM*

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The timing of the Union Pier application is troublesome. This enormous proposal should not be considered before the Charleston Comprehensive Water Plan and the updated Downtown Peninsula Plan have been completed. Much has changed since the zoning and planning governance now in force were enacted. Given the vast climate developments and the livability issues that threaten quality of life here, this proposal should wait until the conclusion of the two plans now under way -- and the public response to them. Additionally, establishing a massive new riverfront neighborhood in and around a marsh at this time seems a folly. Charleston is combatting serious land subsidence and sea level rise. The entire peninsula is at risk. This project would only magnify that risk -- not only for the adjoining neighborhood, but for the entire downtown community. Knowledgeable scientists, resilience officers, and concerned citizens in communities around the country are working to LIMIT the risk of flooding; this proposed Union Pier development does the exact opposite. I oppose approval of this project. Efforts to preserve this special city should primarily focus on protection, safety, and sustainability. This project does none of these.

- **Zac Viscidi, 59 Cypress St:**

*Submitted on Innovation website Mar. 21, 2023 7:22 PM*

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The city needs to push for a large, inland public park that can accommodate and attract feature events. The island idea is fantastic, but a Marion-Square sized park around the Bennett Rice Mill Facade would do more to support business and commerce in the area than any one (or two or three) buildings could. Large public spaces attract world class events and

would allow us to bring back Food & Wine, expand SEWE, and develop more downtown events.

- **Jordan Sandlin, 1273 Winchester Dr. Charleston SC 29407:**

*Submitted on Innovation website Mar. 21, 2023 9:25 AM*

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The Union Pier redevelopment plan, as it has been shown, does not have the historic fabric of Charleston in mind. Massive buildings take up entire blocks with very little access to public community spaces. The historic Bennett Rice Mill is sandwiched between enormous buildings with little room to showcase its beauty and historic context. As a Charleston resident, the importance of developing our historic waterfront properties is paramount, and this plan leaves out the thoughts and concerns of residents. We want access to enjoy the waterfront without obstructive views from large block buildings. We want sensitive development that caters to the historic nature of our city. I am asking the TRC to hold the developers accountable for making this once-in-a-lifetime property a destination that works for all of us by including more public green space, accessible access, and less density. Thank you, Jordan Sandlin Project Manager, HW Exhibits (Brockington and Associates)

- **Tommie Robertson, 2 Lauren's St., Unit 2C, Chas 29401:**

*Submitted on Innovation website Mar. 21, 2023 10:33 AM*

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Good design (as demonstrated by Lowe) must NOT stop at Laurens St.!! The Lowe designed waters-edge promenade must continue to connect with existing wall/walk in front of Maritime Center, IAAM and beyond, extending to Irish Park. The proposed Army Corps of Engineers wall along Concord St would be a disaster! The Lowe promenade will provide flood protection to condo homes along Laurens St. (VERY necessary based on damage experienced at Dockside condos). Extension of Lowe water-side promenade will also protect valuable tourist sites along waterfront, extending from Laurens St to Irish Park. Consider the very negative stigma of Army Corps wall along Concord St leaving the IAAM OUTSIDE wall and exposed to flood damage...NOT good symbolically nor functionally! Lowe has demonstrated in earlier projects exceptional design expertise in addressing water issues while still creating aesthetically beautiful properties. Their design, NOT Army Corps of Engineers, must prevail! And City must assure seamless interface from Union Pier to existing neighborhood streets/communities for cohesive, unifying design.

- **Ellen Harley, 23 Wentworth St Charleston SC 29401:**

*Submitted on Innovation website Mar. 22, 2023 5:25 AM*

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Environmental Sustainability should rank above all else as this project moves forward. Consistency of use with the historic Ansonborough neighborhood as the agreed upon mandate for Union Pier inclusion of single family housing must be a part of the plan. Chasing TIF funding and an insistence by developers to construct as many units as possible for maximum profit should not be the goal. Other tax revenues rather than TIF funding and infrastructure monies should be used to fund this project so that a true neighborhood emerges rather than maximizing for profit.

- **Rebecca Lovett, Weims Court, Charleston:**

*Submitted on Innovation website Mar. 22, 2023 5:27 AM*

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The project's initial draft renderings set the stage for an innovative space that will benefit the city and its residents, but so far, the details to make that happen are missing. Please ensure the promising vision set forth by the project team will become a reality. Thousands of hours of community input went into Charleston's recently adopted comprehensive plan, known as the City Plan, and its world class Land and Water Analysis. Specific water management measures and best management practices like the use of green infrastructure and nature-

based solutions that are called for in the City Plan must be required in the plan for Union Pier. In the current draft plan, they are only optional. This must be changed. I encourage commissioners to make sure the Union Pier project aligns with the City Plan. This will help ensure solid solutions for water management as well as improve mobility, extend the historic urban grid, and create new public greenspaces. We have one chance to get this project right. Thank you for listening to the citizens of Charleston and not only the developers.

- **William Kee, 64 Society Street:**

*Submitted on Innovation website Mar. 22, 2023 5:48 AM*

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The Union Pier Plan must be required (not just optional) to align with the city plans for water management and development. The Plans should require green infrastructure and nature based solutions for flooding and water management. The height of the buildings must be lowered and the density of the buildings reduced.

- **Fred Palm, not City of Charleston:**

*Submitted on Innovation website Mar. 22, 2023 5:53 AM*

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Remove the SPA. The land was let to the SPA free and clear for its use. The land must be returned free of ground leases, and design stipulations. SPA in the money extraction game. It will continue to distort city policy through a redevelopment authority. Get SPA out.

- **Eldon Brown, 2092 Promenade Ct.:**

*Submitted on Innovation website Mar. 22, 2023 9:19 AM*

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As Charleston approaches this once in a multi-generational opportunity to develop an extraordinary piece of land on the peninsula, I am praying that they will put the best interests of the residents who not only live downtown, but all the residents who live in Charleston County. It can be a wonderful project that will allow Charleston to show the rest of the country, that it values the history of the city, it values the live ability of their residents over the ultimate greed of developers need for profit. Our entire county has been devastated by over development, please do not let this happen again to this outstanding piece of property on the peninsula.

- **Vince DiMauro, 5 Gadsdenboro St., Apt 417 Charleston, SC 29401:**

*Submitted on Innovation website Mar. 22, 2023 9:54 AM*

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1..I am concerned that, when complete, the Union Pier Development Stormwater system will push water to the South of the Development during King Tides and Tropical/Hurricanes. Their wall will be at least 9' and possibly 12'. It seems to be very well planned to protect the Pier, but at the same time it magnifies the risk of flooding to the North and South of the development. 2. Laurens will be widened and what appears to be garden like structures will be located along Laurens to collect runoff - the development or city has to take responsibility for maintaining these very pretty catch basins. 3.If the mosquito fleet is located at the end of Laurens, the road will not have a barrier to hold back any water from King Tides, storms etc. there has to be a better place to locate the fleet. Thank you for listening.

- **Elizabeth Hagood, 25 Wappoo Creek Pl, Charleston, 29412:**

*Submitted on Innovation website Mar. 22, 2023 11:06 AM*

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3 Questions: 1. How can you require PUD compliance with both the Water Plan and Peninsula Plan when they are both in the middle of being developed? Given the existential threats of flooding and sea level rise and the cumulative impacts of over development, over-tourism and the affordable housing crisis that those plans must address at a city-wide level, will you require that the UP PUD meet all requirements of both city plans and not be considered by Planning Commission or Council until those plans are finalized? To do otherwise would be to

give preferential treatment to an outside developer at the peril of residents and to make a mockery of the city's planning efforts. Furthermore, the principles of the Dutch Dialogues will be permanently lost if they are not applied to Union Pier. The City must control this process and set the vision (and subsequent development requirements), not allowing the tail to wag the dog. Proper sequencing is the only way the City's needs and vision can be realized. A current, applicable Water Plan and Peninsula Plan must be viable and complete before the City considers this PUD for Union Pier. 2. How can you consider a PUD strategy based on "Fill and Build" given the obvious legal and environmental impacts of such a strategy? 3. This PUD is developed to maximize financial returns based on maximum development which requires the most intensive capital infrastructure. There are other creative, resilient, community-based alternatives that have not been considered and will not be allowed to be considered if this PUD is approved without an opportunity to consider more resilient, less costly alternatives. Other financing tools for a plan more focused on the public realm (resilience, open space, access, quality of life, cultural integrity) are available if the City would require vetted, world-class standards for resilience, water management and cumulative impacts to existing neighborhoods.

- **Cynthia Bledsoe, 1281 Camerton St Charleston 29407:**

*Submitted on Innovation website Mar. 22, 2023 11:09 AM*

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Please make sure the Union Pier project aligns with the City plan. Specific water management measures and best management practices like the use of green infrastructure and nature-based solutions that are called for in the City Plan must be required in the plan for Union Pier, and not be optional.

- **Pamela Watson, 34 Society Street, Unit C:**

*Submitted on Innovation website Mar. 22, 2023 11:13 AM*

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Charleston has been an example thoughtful stewardship of a history for centuries. This outcome is by no means an accident with Historic Charleston Foundation and other organizations ensuring entire historic neighborhoods were nurtured back to health. Charleston is a very delicate ecosystem and a 60 acre development has the potential to change the entire city. The sheer density of the proposed plan is alarming for this delicate ecosystem. This is a wonderful opportunity to be thoughtful about use, scale and environmental impact. Thoughtfulness requires time and it seems this proposal is moving at lightning speed. Lets get this right so the next century isnt spent remediating the substantial impacts of this proposal.

- **Katie Zimmerman, 478 King Street, Suite F:**

*Submitted on Innovation website Mar. 22, 2023 11:21 AM*

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Dear Chairman Karesh and Members of the Planning Commission, Thank you for the opportunity to submit comments regarding the Union Pier Redevelopment Plan put forth by Lowe Enterprises and the South Carolina State Ports Authority (SPA). Charleston Moves echoes the comments from our colleagues at the Coastal Conservation League, Historic Charleston Foundation, and Preservation Society of Charleston regarding the trajectory this project seems to be taking. First, the redevelopment of Union Pier is a once-in-a-lifetime opportunity that will require substantial public support and financing in order to not only serve and connect the community, but to even break ground. We expect to see a City-led public process to ensure transparency and success. Second, the City of Charleston's Zoning Code (Section 54-254(a)) requires the Planning Commission and City Council to find each Planned Unit Development (PUD) application to be "consistent with the City's adopted comprehensive plan and all adopted plans for sub-areas of the City." The first draft of the PUD submitted by the applicant also asserts they are pursuing consistency with the City Plan goals and with the City's master roads plan. Because the current City Plan lists the Union Pier property as a "Future Planning Area," the applicant concedes in their first PUD submission that an updated

comprehensive plan for this sub-area of the City is necessary to ensure “consistency” and satisfy 54-254(a). A comprehensive planning process must be completed by the City before the rezoning request for Union Pier is considered. In addition to those points, we at Charleston Moves believe the process of rezoning and redeveloping Union Pier has so far been backwards. Because of the substantial public investment required for this property, the tax increment financing (TIF) district should be hashed out now. There has been no public presentation of how much financing is needed to design, construct, and maintain world-class resiliency and stormwater infrastructure, complete streets and transit infrastructure, and affordable housing on this property. For example, the applicant has listed green infrastructure as “optional” in the first draft of the PUD, presumably to give the City the opportunity to pursue based on the taxpayers’ investments later. This redevelopment project could be transformative, so let’s get the investment formula set from the beginning in order to design the best possible new neighborhood for Charleston as a whole. We look forward to submitting more detailed comments at the next special Planning Commission session. Sincerely,  
Katie Zimmerman Executive Director Charleston Moves

- **Richard Land, 55 Laurens St:**

*Submitted on Innovation website Mar. 22, 2023 11:39 AM*

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building height should be limited so as not to block the view of the harbor by the mansions in Ansonborough

- **Joseph Hall, 1622 Battery Island Dr, 29412:**

*Submitted on Innovation website Mar. 22, 2023 11:40 AM*

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Regarding redevelopment of Union Pier: strict height limits should be called for and enforced. 3 stories at the street, 4th story possible away from the street so that natural light can reach more of the street for more hours of each day.

- **John Adams, 58 Society Street:**

*Submitted on Innovation website Mar. 22, 2023 11:40 AM*

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Why is the 15 foot build up of the site necessary? Section 54-251 of the PUD statute explicitly states that its intent is “to insure compatibility of developments with surrounding areas.” The 15 foot build up of the site will be approximately the same level as Ansonborough streets, and thus would seem to increase the risk of flooding in Ansonborough. What will be done “to insure” that this does not happen as contemplated by the statute? The 15 foot build up of the site is intended to integrate with the flood wall in order to mitigate storm surge. These two are not integrated in their construction timing in the PUD application. Shouldn’t their integration be required in order to adequately deal with the stormwater issue on a comprehensive basis? The construction of the stormwater system requires selection of a contractor with substantial financial resources. Shouldn’t a payment and completion bond be required as a condition of entering into this construction contract so that its completion is guaranteed by a financially reputable insurance company?

- **Jay Williams Jr., 81 King Street, Charleston:**

*Submitted on Innovation website Mar. 22, 2023 11:45 AM*

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It’s my understanding that the cruise terminal location will remain exactly where it is next to Fleet Landing—except that a new, larger terminal will be built in its place—and that port-of-call cruise ships will continue to visit Charleston. My question is will the entire 2500-foot pier that can dock at least two average-sized ships simultaneously remain in place, and could the SPA still host as many as 104 ships per year here in the future if they choose to come?

- **Gerry Schauer, 24 Menotti Street, Charleston, SC 29401:**  
*Submitted on Innovation website Mar. 22, 2023 11:50 AM*

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Dear Planning Commission, I am a resident of Ansonborough and also a boat slip owner at Laurens Place Marina, immediately North of Union Pier. My question is about the water today. The UP plan shows activation of the waterfront adjacent to the boat slips and also an open waterway/new creek heading south from there, which will make an 'island park' on the harbor. If the developer and/or the owner shift the silt and change water flow, it could add silt at the slips, make the water more shallow and reduce our ability to safely come and go from our slips. What assurances do we have that the creation/activation of these components will not have a negative effect on slips at Laurens Place Marina? Specifically, can we be assured, through a commitment attached to the PUD, that the work they do and the resulting waterway and its use will not make our water more shallow? And confirm that if there is a problem, they will be required to address it? Thank you for your consideration, Gerry

- **Betsy La Force, 131 Spring Street:**

*Submitted on Innovation website Mar. 22, 2023 11:59 AM*

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March 22, 2023 ATTN: Mr. Charlie Karesh, Chair Mr. Harry Lesesne Ms. Loquita Bryant Jenkins Ms. Donna Jacobs Ms. Sunday Lempesis Mr. Jimmy Bailey Ms. Erika Harrison Ms. Angie Johnson Ms. McKenna Joyce City of Charleston Planning Commission Department of Planning, Preservation & Sustainability 2 George Street, Suite 3100 Charleston, SC 29401 RE: Union Pier Informational Session on Resiliency & Stormwater (Plan Number: PUD 2023-000025) Dear Chair Karesh and members of the Planning Commission, Thank you for the opportunity to comment on the proposed Union Pier Redevelopment Plan. The Coastal Conservation League is a nonprofit advocacy organization working to protect the health of the natural resources of the South Carolina coastal plain and ensure a high quality of life for all of the people who live in and love this special place. We appreciate the special information session to discuss the resilience and stormwater management aspects of the proposed redevelopment in this public forum. However, we urge the city 1) to continue to pursue a robust public engagement process that this redevelopment opportunity warrants and 2) to ensure the resilience and stormwater aspects are in compliance with existing and ongoing city planning efforts. We recognize and applaud the city's ability to host meaningful public engagement sessions like we experienced during the recent City Plan update, the Dutch Dialogues process, and the Plan West Ashley public engagement processes. Similar significant public engagement is needed for Union Pier to ensure the redevelopment process is inclusive, captures the vision of the community, and is aligned with the positive new direction the city has committed to taking to address rising seas, increased rainfall, increased heat, and other resilience related impacts that the city is experiencing. In the current draft PUD that was reviewed by TRC on March 2, 2023, we are concerned that the green infrastructure elements are not specifically listed as required components of the infrastructure plan and reflected in the PUD. If the common parks and open spaces are to be designed and built to city standards in order to be conveyed to the city to own and maintain in perpetuity, the city must ensure the financing and maintenance plan for the critical green infrastructure components are in place before the project is approved to ensure it will successfully function into the future post construction. The plan relies on grey infrastructure such as pipes and outfalls to convey stormwater from the site. However, the system should be designed for redundancy and supported by natural green infrastructure elements that perform critical functions to protect us when other parts of the system fail. Diverse components of a connected system create a stable whole. Thousands of hours of community input and research went into Charleston's recently adopted City Plan and its world class Land and Water Analysis. As was stated in our joint letter submitted in conjunction with the Preservation Society of Charleston and the Historic Charleston Foundation, we feel strongly that a separate planning effort is needed to amend the comprehensive plan and

address the Union Pier site which is designated as a future planning area. Specific water management measures and best management practices like the use of green infrastructure and nature-based solutions that are called for in the City Plan must be required in the plan for Union Pier in order to ensure those elements are built by the eventual owners. Currently, the draft PUD states “The stormwater management design for the proposed site includes increasing the elevation of the area along the proposed Concord Street corridor to an increased elevation which will become the maximum elevation of the site (“high point”). It goes on to state that “the main components of the proposed stormwater management system include enlarging the two main systems along Society and Hassel Streets draining the Ansonborough Neighborhood through the site. These two systems – elevation and new main lines – will continue to drain off-site areas” There is no mention of green infrastructure for the stormwater management design for Union Pier in the draft PUD. There is also no resilience appendix included in the draft PUD, making it difficult to assess the details in this forum with no clear commitments to the design, financing, implementation or maintenance of these systems. Considering the Union Pier site is mostly comprised of asphalt, any green infrastructure implementation will create less runoff than is occurring now. The proposed design of this site should be required to meet the 20-percent impervious cover reduction target, at a minimum. To help achieve this target, green infrastructure details such as native roof meadows and raingardens should be incorporated and required throughout the design. Green rooftops, presumably flat, can capture two or more inches of rainfall, create new habitat, and improve energy efficiency of the new buildings. Floodable parks to capture, filter, and store water before it is released back into the harbor should also be a key focus of the open space planned for this development, pulling from the Dutch Dialogues report. We are not asking for anything more than what this commission worked diligently and collaboratively across departments and with City Council to approve and uphold in the City Plan, the Dutch Dialogues, and the stormwater manual. The groundwork has already been laid for successful resilient urban developments to be built in the city. It is the city’s responsibility to ensure this new “city on a hill” — to be built in the vulnerable 100-year floodplain on historic peninsula is compatible with adopted and pending city plans, like the water plan, and does not negatively impact existing neighborhoods by increasing flooding and runoff associated with new development on this site. The success of resilience and stormwater aspects for the plan hinge on specific financing and ownership details that are largely missing from the draft PUD that was submitted to TRC before its meeting on March 2, 2023. We urge the Planning Commission to require those details be clearly articulated and included in the plan before approving the request to rezone. Additionally, we encourage the Planning Commission to address the following questions in the public forum during the informational session: How will the redevelopment of Union Pier serve as a local and national model for resilient development? How will the construction be considered resilient if the large-scale use of fill material will be used to elevate the entire site, raising the height to 16’ in the center of the development? How will the Union Pier Plan incorporate the proposed seawall? How will the infrastructure associated with this project contribute positively to the surrounding community by supporting needed stormwater management in adjacent neighborhoods? How will a reduction of stormwater runoff from the site be achieved? How will current stormwater regulations for Special Protection Areas be upheld for this site? How will the stormwater infrastructure, both green and grey be funded and maintained? How will the green infrastructure and “marshlet” areas be integrated into an elevated site? Thank you for your thoughtful consideration of these questions and comments. We look forward to continued engagement on this project as it moves forward. Sincerely, Betsy La Force  
Sustainable Communities Program Director Coastal Conservation League





PRESERVATION  
ESTD SOCIETY 1920  
of CHARLESTON



March 20, 2023

Mr. Charlie Karesh, Chair  
Mr. Harry Lesesne  
Ms. Loquita Bryant Jenkins  
Ms. Donna Jacobs  
Ms. Sunday Lempesis  
Mr. Jimmy Bailey  
Ms. Erika Harrison  
Ms. Angie Johnson  
Ms. McKenna Joyce  
City of Charleston Planning Commission  
Department of Planning, Preservation & Sustainability  
2 George Street, Suite 3100, Charleston, SC 29401

Via Web Portal at <http://innovate.charleston-sc.gov/> & Via email to  
Morganc@charleston-sc.gov

Re: Union Pier Redevelopment Plan

Dear Chairman Karesh and Members of the City of Charleston Planning Commission:

Our organizations are united in our desire to create a vibrant, resilient, and inclusive new neighborhood at Union Pier Terminal that is consistent with the scale of the city. We appreciate the applicant's desire to meet the city's infrastructure needs in a sustainable way that does not create environmental damage and harm to the surrounding neighborhoods and the opportunity to comment on that plan.

We welcome the discussion on resilience and stormwater management that will be the core focus of the Special Informational Meeting scheduled for March 23, 2023. Yet we also believe that **this meeting should not be a substitute for the robust public engagement process this opportunity requires.** As you know, there is considerable interest in the project from the community at large – and the community expects a public process of engagement that thoroughly presents and examines alternative potential plans that meet the infrastructure needs of the city and the Union Pier site. It is important that this information be fully vetted prior to its anticipated re-zoning.

Charleston Zoning Code § 54-254(a) requires the Planning Commission and City Council to find each Planned Unit Development (PUD) application to be "consistent with the City's adopted comprehensive plan and all adopted plans for sub-areas of the City." Because the current City Plan lists the Union Pier property as a "Future Planning Area," the applicant concedes in Section 1 of the January 30<sup>th</sup> Submission that an updated comprehensive plan for this sub-area of the City is necessary to ensure "consistency" and satisfy 54-254(a).

We urge the Commission to complete the comprehensive planning process in advance of its consideration of this rezoning request. In fact, we believe that this comprehensive planning update and adoption by Council is required to make the PUD rezoning consistent with the City's ordinance and state law. The comprehensive plan provides the framework for zoning. The pending process is backwards and has the proposed zoning dictating the land use element of the comprehensive plan.

The need to promulgate an update to the City Plan before this PUD is considered gives this Commission and the Department of Planning, Preservation & Sustainability the obligation to sequence its approvals in a manner mindful of its responsibilities under state law and the City's ordinances as well as of the significant community interest in Union Pier. To meet the consistency standard, the City must ensure that the community's values as manifested in the comprehensive plan are the benchmarks for the PUD application. To that end, our organizations are united in our desire for City Council to agree on a strong vision for this new neighborhood prior to, and not concurrent with, the zoning request. Otherwise, the planning commission will simply be rubber stamping the zoning as the land use envisioned by the comprehensive plan without the required comprehensive planning process ever taking place.

There are several critical reasons why a proactive city visioning process is necessary in advance of considering this PUD application. First, at this juncture, the City cannot rely upon previous planning efforts. The 1996 Concept Master Plan for Union Pier and the City's 1999 *Downtown Plan* are significantly outdated and inadequate to rely upon for a re-zoning request for such a large swath of downtown waterfront property twenty-four years later.

There are also obvious and troubling implications of using planning documents that did not address or anticipate urgent issues Charleston faces a quarter-century later, namely: flooding and sea level rise, special zoning districts, the affordable housing crisis, a shortage of parks and public places downtown, the proliferation of large-scale development, and the dramatic impact of hotels, short-term rentals, and other tourism-related commercial uses.

Further, the City has a unique opportunity to set a values-driven vision through the ongoing development of the City's *Peninsula Plan* and the comprehensive *Water Plan*. Union Pier has the potential to have a transformational effect on Charleston, and great care should be taken in its master planning through community engagement to ensure that it contributes to the character and vibrancy of our city. If the PUD is approved in advance of these ongoing planning efforts, it would constrain the ability of consultants the City has already hired to engage in meaningful planning, particularly concerning resiliency and stormwater management in the affected areas.

Finally, a proactive planning effort led by the City, not the property owner or developer, will ensure that public comment and input are directed in a manner that ensures transparency and accountability. While we applaud the applicant's initial efforts to gather public comment on the plan last fall, it is the City's responsibility to ensure that it hears the views of its citizens about a vision for this part of the city, rather than a privately hosted session where attendees are limited to commentary about a highly conceptual plan that has been proposed. Our groups, for instance, would be keenly interested in having a public forum to discuss alternative visions and strategies in a manner that is not simply responsive to an application under active consideration.

We hope that, for the foregoing reasons, this Commission will act to ensure that adequate standards are set for what is easily the most significant development in City history to protect the public and the City's interest. We are eager to work with you in efforts to put forward a values-driven, and community-supported vision for the Union Pier site.

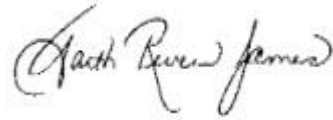
Sincerely,



Brian R. Turner, J.D.  
President & CEO  
Preservation Society  
of Charleston



Winslow Hastie  
President & CEO  
Historic Charleston  
Foundation



Faith Rivers James, J.D.  
Executive Director  
Coastal Conservation  
League