



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 30th 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.

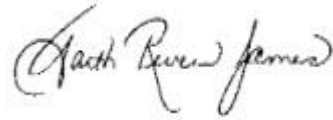
Sincerely,



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