

Lee Higdon, President
Charlestowne Neighborhood Association
P.O. Box 548
Charleston, SC 29402
charlestowneneighborhood@gmail.com

October 7, 2022

Barbara Melvin, President
South Carolina Ports Authority
200 Ports Authority Drive
Mount Pleasant, SC 29464

VIA US MAIL AND EMAIL

Dear Ms. Melvin:

I am the President of the Charlestowne Neighborhood Association ("CNA") and I am responding to the request by the South Carolina Ports Authority ("SCPA") for CNA's views on SCPA's proposed sale, and subsequent development, of the Union Pier site. SCPA has requested that CNA provide its input in October, and we appreciate the opportunity to do so.

Although the plans for Union Pier are not yet clear, the development of the site has raised important concerns, explained below, among CNA's members.

CNA has 556 member households, living on Charleston's peninsula. CNA's members are concerned that the development of Union Pier could adversely affect the city's residents and its historic fabric, if that development: a) adds hotels; b) ignores flooding; or c) clashes with the city's charming character.

The development of Union Pier should not add more hotels on top of those already built and planned for the peninsula.

Charleston's 2015 Tourism Management Plan ("TMP") recognized that tourism had brought a variety of problems to the city and its residents, and that the city must impose some limits.

The city declared, in its 2015 TMP, that it would "[a]ddress concerns over recent substantial hotel room increases" by "moderating future hotel room increases". Nevertheless, substantial numbers of hotel rooms have been added, especially

since 2019, resulting in traffic, crowds, insufficient parking, pollution, noise and other ills. The development of Union Pier should not exacerbate this problem by adding yet more hotels. If, nevertheless, any hotels are included in the plans for Union Pier, they should be consistent with an updated TMP which sets real limits on the proliferation of hotels on the peninsula.

The plans for Union Pier should also include measures to mitigate flooding. The city has been plagued in recent years by increased flooding. The city has thus spent millions on flood control and has stated that it will spend tens of millions more on the design of a perimeter protection system around the peninsula, proposed by the Army Corps of Engineers. Perimeter protection, and other flood prevention measures, should be a required part of the Union Pier plans. To this end, SCPA's contractors working on the plans for Union Pier have already outlined a variety of ways in which flood mitigation could be seamlessly integrated into the design and aesthetic appeal of the area. Elevated buildings and promenades for perimeter protection, wave attenuation devices under the pier, subterranean drainage conduits, and other measures could reduce the flood risk, of both the Union Pier area itself and its surrounding neighborhoods, from all types of flooding. These measures, and/or similar ones, should be studied to ensure that they will provide adequate protection against flooding, and then implemented as part of the Union Pier development.

The new structures to be built at Union Pier should mesh with, not conflict with, the historic character of the peninsula. Not only the facades and ornamentation of the buildings, but also their mass, should be consistent with Charleston's historic fabric, styles and skyline.

The conditions outlined above should be mandatory, not optional, in the development of the property. The documents for SCPA's sale of Union Pier must clearly impose on the buyer: limits on hotels; flood protection requirements; and building standards. If these terms are not specifically delineated up front, by the city and SCPA in the sale process, they will be difficult, if not impossible, to impose on the buyer/developer after the sale.

Given the magnitude both of the potential benefits of the development of Union Pier to CNA's members, and of the potential harms that they could suffer if their concerns are not addressed in the planning of the development, CNA should be included in the planning process. While CNA appreciates the

opportunity to submit comments at this early stage, it is crucial that CNA continue to provide input throughout the process. A formal mechanism should be put in place, to ensure that CNA, and other appropriate stakeholders, are kept informed of the plans and documentation as they are being prepared, and that the views of CNA and those other stakeholders are received and fully considered during that process.

Sincerely,



Lee Higdon

President, Charlestowne Neighborhood

Association

Tel: 860-867-6881

lhigdon@conncoll.edu

cc (via US mail and email):

John J. Tecklenburg, Mayor, City of Charleston

Mike Seekings, District 8 Councilmember, City of
Charleston

Jennifer Cook, Clerk of Council (for distribution to
Charleston City Council)