

January 13, 2023

Planning Commission
Horry County Government
1301 Second Avenue
Conway, SC 29526

Re: Development Resources Group, LLC Rezoning Request 2020-10-003 (TMS Parcel 3960000001); Conway Medical Center Facility

Dear Horry County Planning Commissioners:

I am writing on behalf of the South Carolina Chapter of The Wildlife Society with respect to the above referenced proposed 358.86 acre rezoning request from General Residential (GR) to Inpatient Medical Services (ME1) located on International Drive, Myrtle Beach (Rezoning 2020-10-003). The Wildlife Society's vision is, "*a strong and effective voice in representing wildlife conservation and management, and ensuring sustainable wildlife populations in healthy ecosystems*". The Wildlife Society is the only certifying organization for wildlife professionals and the South Carolina Chapter represents over 100 wildlife biologists from state and federal agencies, NGOs, private firms, and academia. The proposed parcel for rezoning (TMS 3960000001) is surrounded by some of the most biologically diverse and ecologically intact properties in South Carolina—Lewis Ocean Bay Heritage Preserve (LOBHP) and the Independent Heritage Preserve Wetland Mitigation Bank (hereafter, Mitigation Bank). Rezoning and development of this parcel will have direct and adverse environmental and public health and safety consequences. On behalf of the South Carolina Chapter of The Wildlife Society, I respectfully request that Horry County deny rezoning of this parcel in addition to the associated requested change to the Comprehensive Plan. As such, this parcel should be rezoned for land uses aligned with its "Scenic & Conservation" designation in the county's future land use plan, Imagine 2040.

Of great concern is South Carolina Department of Natural Resources' (SCDNR) ability to effectively manage LOBHP with prescribed burning. The 37 rare plant species and associated wildlife known to LOBHP require fire to promote growth and deter aggressive, competing vegetation. Horry County is also prone to wildfires (e.g., the 2009 Horry County Hwy 31 Fire). As such, prescribed burning provides public health and safety benefits by reducing volatile fuel loads. The presence of an adjoining medical facility would create a burdensome smoke-sensitive area; thus, greatly reducing SCDNR's capacity to safely and efficiently conduct prescribed burns. The SCDNR is statutorily obligated to conserve these habitats using best management practices, which includes prescribed fire. The fact that Horry County installed gates to close International Drive during these controlled burns indicates the county understands and acknowledges the importance of prescribed fire in this area for the benefit of wildlife habitat, conservation, and public safety. The proposed medical facility would require relocation of these gates; thus, rendering their intended purpose ineffective and creating undue risks to motorists and SCDNR personnel charged with conducting these burns. Also, given that even with proper planning and considerations, wind directions are always subject to change. This unpredictability will put patients and staff of the proposed medical facility at risk of degraded air quality from

smoke produced during prescribed burning. In addition to LOBHP, the adjoining Mitigation Bank is composed of the same habitats and associated rare plants and wildlife that require prescribed fire. The most qualified long-term steward (LTS) agency for this Mitigation Bank is SCDNR and it is most unfortunate they have rescinded their LTS offer due to this potential rezoning and embarrassing for Horry County.

Also of concern is the negative impact development of this parcel will have on adjoining wetlands and the Waccamaw River watershed. Destruction and degradation of upstream wetlands directly affects associated watersheds. More than 60% of the parcel proposed for rezoning are wetlands, which are not isolated but weave throughout the parcel and connect with the aforementioned adjoining conserved properties. It would be impossible to develop this property without causing significant destruction of these and surrounding wetlands. Aside from their importance as critical habitat for many plant and wildlife species of conservation concern, these wetlands provide ecosystem services to the residents of Horry County by providing clean drinking water and sinks for problematic flooding.

Upon reviewing documentation the Planning Commission has received from SCDNR and other stakeholders, it is apparent that the Commission is fully-informed of the ecological significance of this and surrounding properties and the environmental and public health and safety risks associated with this proposed rezoning. While I understand the need for medical facilities to meet community needs and provide quality, accessible, health care, there is only one LOBHP. Why the Commission would consider rezoning the proposed parcel given better-suited options with less collateral risks, destruction, and controversy is unclear. Especially considering this was identified and designated as "Scenic & Conservation" land use under the county's own Imagine 2040 land use plan developed based on public input. For these reasons and on behalf of South Carolina's wildlife professional community, I do not endorse any rezoning actions resulting in conversion from GR to ME1 for parcel TMS 39600000001 and recommend upholding the previous decision, per Imagine 2040, for scenic and conservation designation. Failure to do so would be contradictory to Horry County's planned land use objectives and demonstrate neglect for the Horry County's and South Carolina's environmental and public health.

Sincerely,



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