

# South Carolina Department of Natural Resources

---



Robert H. Boyles, Jr.  
**Director**

January 6, 2021

Mr. John P. Danford  
Deputy Director, Planning & Zoning  
Horry County Government  
1302 2<sup>nd</sup> Avenue  
Conway, SC 29526

Re: Development Resource Group, LLC Rezoning Request 2020-10-003  
(TMS Parcel 39600000001)

Dear Mr. Danford:

The South Carolina Department of Natural Resources (SCDNR) recently met with leadership of the Conway Medical Center regarding the proposed rezoning of the subject parcel adjacent to the Horry County Mitigation Bank and the SCDNR's Lewis Ocean Bay Heritage Preserve (LOBHP).

The SCDNR appreciates the opportunity to provide further input regarding the rezoning both to the County and to the applicant. In the initial letter dated October 26, 2020, the SCDNR stated that a medical facility, such as a hospital, and the prescribed fire management activities on LOBHP were not compatible. However, the agency respects the rezoning process and the responsibility of the County to make well-balanced decisions in the best interest of the citizens of Horry County. The SCDNR must make similar decisions as stewards of the natural resources of this beautiful state for the more than five million South Carolinians residing here.

In doing so, the SCDNR has an obligation to continue, as we have done for 31 years, to apply prescribed fire management to the LOBHP to promote the growth of sensitive plants and other resources that make this property unique. The SCDNR is proud to protect the rare resources like the Venus flytraps that are found locally abundant at LOBHP that thrive due to the natural resource management and use of prescribed fire applied by SCDNR staff. These same management techniques are what will be employed by Horry County's consultants on the Mitigation Bank, adjacent to the north of the parcel in question, and eventually the SCDNR when the property is transferred to the agency and dedicated into the Corpus of the Heritage Trust as a part of the LOBHP.

In the conversations with Conway Medical Center, we explained our obligations as stewards of the natural resources, as well as our longstanding commitment to be good neighbors in Horry County. Because of our statutory obligations to protect, enhance and preserve the LOBHP in perpetuity under the Heritage Trust statute, the SCDNR wants to make sure that whomever our neighbor may be that they develop and manage their parcel in a way that is compatible with the continued existence of prescribed fire on the landscape and in a way that has a minimal environmental footprint. Our neighbors in this landscape must have an understanding that fire, both natural and prescribed, is part of the ecology.

Each year, it is the goal of the SCDNR to burn at a minimum 1,500 acres of the 10,000 acres of LOBHP. With the addition of the Horry County Mitigation Bank tract into LOBHP, the SCDNR anticipates the frequency of burns and the potential for smoke and road closures to increase. During these prescribed burns, smoke can remain in the area for a few days after the burn, depending on weather conditions that can cause inversion (an atmospheric phenomenon that occurs when climate and meteorological conditions combine to trap smoke close to the ground at night). Some of these prescribed burns, and the incidental inversion that can occur, may require the closure of International Drive, as reflected in the earlier agreement between our agency and Horry County regarding improvements to International Drive. It is important to continue these closures for the safety of those that utilize the roadway due to limited visibility and the safety of the SCDNR staff that also use the roadway to monitor the prescribed burn with ATVs, pumper truck units, and bulldozers.

The SCDNR uses prescribed burns to not only maintain the viability of the habitat that is necessary to sustain threatened and endangered species that occur on LOBHP, but also as a means to reduce the fuel load to help minimize the degree of intensity of future wildfires. The waxy evergreen fuels of Carolina bay and pocosin complexes are a volatile fuel source for wildfires. Peat soil type fires ignited under dry conditions, that are often the result of wildfires, can burn underground for months and often cause smoke management concerns. According to the S.C. Forestry Commission, wildfires are not uncommon on the Horry County landscape around what is now known as the LOBHP. Prior to the most destructive wildfire occurring in 2009, the area formerly known as the Buist tract, that included all of LOBHP, burned as a result of wildfire nine times from 1954 to 2002. The Bombing Range Fire burned 10,162 acres in June 1954. Thirteen years later, a wildfire burned on the Buist Tract in April 1967, known as the Socastee Plantation Fire, burning 6,005 acres. In 1976, the Clear Pond Fire became the largest forest fire in South Carolina history burning 30,000 acres of the Buist tract. Subsequently, there was the Cotton Patch Bay Fire (2,500 acres) in 1981, the Forestbrook Fire (844 acres) in 1996, the Long Bay Fire (1,911 acres) in 2001 and the Legends Fire (1,658 acres) in 2002. Then, the most destructive wildfire occurred in 2009, the Hwy 31 Fire, burning 19,130 acres, of which approximately 9,000 acres was a part of the LOBHP. This fire destroyed 76 homes and damaged 97 others before it was controlled. The most recent wildfire occurred in June 2016, the Golden Triangle Fire, on LOBHP, just across International Drive from the proposed hospital site. Fortunately, this wildfire event was quickly dissipated by a heavy rainfall event.

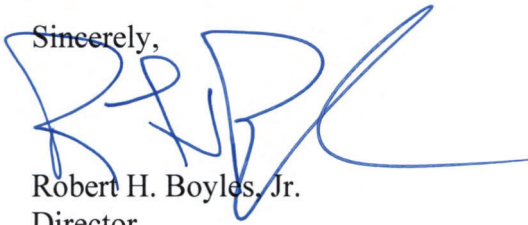
Bottom line, this landscape is not foreign to fire; smoke will be present.

The SCDNR respects the decision-making process of the County and understands the need to provide medical services to the community. We just want to be sure that whomever our neighbor may be at LOBHP, including the future Horry County Mitigation Bank, that they are developing the parcel with an understanding of the fire ecology that occurs naturally in this area of the state. This landscape requires the use of prescribed burns to regularly encourage growth of the species that SCDNR is statutorily required to protect. The SCDNR staff must make decisions on when and where to burn based on many atmospheric factors, including wind, temperature and humidity, and staff must be able to burn when the conditions allow. This means the parcel in question will be inundated with smoke and International Drive may be closed from time to time whether from prescribed fire or wildfire. Any development next door needs to be compatible with the agency's duty to apply prescribed fire. We want the County and our neighbors to understand that the SCDNR has an obligation to the citizens of South Carolina to be a steward of the unique fire-dependent habitats and species that thrive at LOBHP.

We hope that many citizens have a chance to get out and enjoy LOBHP—now and in the future—and we hope that community leaders appreciate the seriousness with which we take our obligations both to be good stewards of and good neighbors in Horry County. LOBHP is a special treasure for the citizens of this state; we hope that everyone has a chance to experience it and connect with our state’s beautiful natural resources. Our goal is to establish a stewardship ethic in all South Carolinians, so that our state can continue to support sustainable use, enjoyment and an underlying appreciation for places like LOBHP and other public lands that make South Carolina such a special place to live, work and recreate.

Thank you for the opportunity to provide these comments. Please do not hesitate to contact Lorianne Riggin regarding further questions. She may be reached at [RigginL@dnr.sc.gov](mailto:RigginL@dnr.sc.gov) or by cell phone at 803-667-2488.

Sincerely,

A handwritten signature in blue ink, appearing to read 'RHB', with a long horizontal flourish extending to the right.

Robert H. Boyles, Jr.  
Director