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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Edward R. Miller, Circuit Court Judge

Appellate Case No. 2023-000144
Case No. 2022-CP-23-03356

Citizens for Quality Rural Living, Inc.,

Appellant,

v.

LyonJay and the Greenville County Planning Commission,

Respondents.

INITIAL BRIEF OF RESPONDENT GREENVILLE COUNTY PLANNING COMMISSION

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STATEMENT OF THE CASE AND FACTS

Appellant Citizens for Quality Rural Living, Inc. (CQRL or Appellant) appealed the Greenville County Court of Common Plea's decision to affirm Respondent Greenville County Planning Commission's (Planning Commission) approval of Respondent LyonJay's (LyonJay) preliminary plan application for a residential community subdivision in Greenville County called River Preserve. On April 6, 2022, LyonJay filed a preliminary plan application seeking to subdivide and develop rural property located a mile south of the intersection of SC-418 and Woodside Road. LyonJay intends to develop the set of unzoned parcels, called River Preserve, and is under contract to purchase the land in question, approximately 220 acres. Pursuant to Article 22 of the Land Development Regulations ("LDR") of the County of Greenville, LyonJay participated in pre-submittal meetings to determine and ensure the plan complied with the LDR. After LyonJay met with planning staff, the application was referred to the Greenville County Subdivision Advisory Committee, which recommended changes and inclusions to the preliminary plan.

LyonJay continued to develop the preliminary plan through revised resubmittals which became part of the River Preserve record maintained by the County of Greenville. The record is available to the public and revisions or updated versions are kept in the physical file as public record. Pursuant to the noticed and publicly available 2022 Subdivision Review Calendar, the Planning Commission held a scheduled monthly meeting on May 25, 2022. At the May 25, 2022, meeting, the Planning Commission considered, and after evaluation of the evidence in the record, discussion, and hearing arguments, approved LyonJay's preliminary subdivision application for River Preserve. Prior to and during the meeting, CQRL representatives opposed the preliminary plan during public comment periods.

After the decision, Appellant appealed to the Circuit Court. Judge Edward W. Miller presided over a hearing on September 23, 2022, after all parties filed briefs. By order filed November 4, 2022, Judge Miller affirmed the Planning Commission's decision.

On November 10, 2022, Appellant filed a motion to reconsider Judge Miller's order. The Circuit Court denied Appellant's motion on January 18, 2023. Thereafter, Appellant filed and served a Notice of Appeal to this Honorable Court on January 30, 2023.

STANDARD OF REVIEW

Appellate courts must uphold a decision by a planning commission unless there is no evidence to support the decision. *Town of Hollywood v. Floyd*, 403 S.C. 466, 744 S.E.2d 161 (2013), *Kurschner v. City of Camden Planning Comm'n*, 376 S.C. 165, 656 S.E.2d 326 (2008). Based on this deferential standard, an appellate court "will uphold the trial judge's decision unless it was based on an error of law or is not supported by the evidence." 744 S.E.2d at 166 (citation omitted), *see Talbot v. Myrtle Beach Bd. of Adjustment*, 222 S.C. 165, 173, 72 S.E.2d 66, 70 (1952) (an appellate court will not substitute its judgment for that of the reviewing body, even if it disagrees with the decision). This Court's review of the Planning Commission's decision requires the same level of deference as that given to a finding of fact by a jury. Commonly referred to as the "any evidence" standard, it is the most deferential standard of review recognized by South Carolina's courts, and planning commissions receive this deference because of the South Carolina Supreme Court's recognition of the "legislature's intent [to grant] broad discretion in this area." *Kurschner*, 376 S.C. at 173-174, 656 S.E.2d at 351; *see Welch v. Epstein*, 342 S.C. 279, 300, 536 S.E.2d 408, 419 (Ct. App. 2000) ("The jury's verdict will not be overturned if any evidence exists that sustains the factual findings implicit in its decision."), S.C. Code Ann. § 6-29-1150.

Appellant advocates for an alleged less deferential standard of review by posturing its arguments weighing the sufficiency and adequacy of evidence available in the record as a matter of law. Planning Commission disagrees and reasserts that, consistent with South Carolina law and recognized during oral argument before the Circuit Court, arguments on the sufficiency or adequacy of evidence are still arguments regarding evidence considered by the Planning Commission. However, even under Appellant's contested standard, the Planning Commission's decision should deferentially be upheld absent the determination of an abuse of discretion based

on an error of law. *Gurganiuous v. City of Beaufort*, 317 S.C. 481, 454 S.E.2d 912 (Ct. App. 1995). The Planning Commission's decision should only "be overturned if it is arbitrary, capricious, has no reasonable relation to a lawful purpose, or if the board has abused its discretion." *Rest. Row Assocs. v. Horry Cty.*, 335 S.C. 209, 216, 516 S.E.2d 442, 446 (1999).

ARGUMENTS

I. The Circuit Court correctly ruled the Planning Commission properly approved the River Preserve preliminary plan based on an appropriate exercise of discretion from the evidence in the record and the approval satisfies the applicable "any evidence" standard of review.

The Circuit Court correctly determined and applied South Carolina law in holding that the Planning Commission's decision was not based on an error of law nor unsupported by the evidence. In order to successfully assault the Planning Commission's decision, Appellant must establish that the decision lacks any evidence in support, or the Commission committed an abuse of discretion. Absent these deficiencies, courts should not become city planners, supplanting planning commissions, and must deferentially avoid second-guessing the decisions of local municipal boards. *See Bear Enterprises v. Greenville County*, 319 S.C. 137, 459 S.E. 2d 883 (1995). Therefore, this Court should affirm the Circuit Court's affirmation of the Planning Commission's decision and dismiss Appellant's appeal.

For the purposes of the appeal to this Court, Appellant seems to concede the Planning Commission's decision is supported by the "any evidence" standard.[1] Planning Commission agrees and asserts the "any evidence" standard is the appropriate standard of review. Under the "any evidence" standard, the Planning Commission's decision is afforded the same deferential weight as that of a jury. "Any evidence" on the record shows that the Planning Commission and Planning Commission Staff had evidence before it for consideration including written public comment, oral public comment, hundreds of pages of applicant submitted preliminary plan data,

[1] "CQRL's arguments accordingly challenge not the sufficiency of the evidence but the preliminary plan's failure to comply with the LDR's legal requirements for wetlands delineation and TIS." (*CQRL Initial Brief*, pp. 10-11). This is in opposition to the position taken at oral argument where sufficiency was also challenged. (*See Transcript*, pp. 35:16 – 36:13).

including a factually uncontested wetlands delineation, and traffic impact study. (*Order*, pp. 2, 5; *Meeting Minutes, May 25, 2022*, pp. 11-14). Under the "any evidence" standard, the record is replete with evidence to support the Planning Commission's decision and should this Court agree, the inquiry for additional sustaining or opposing grounds may end.

Appellant instead attempts to frame the appellate argument within the "error of law" standard as a perceived more beneficial standard to its position arguing against the Planning Commission's decision. Specifically, Appellant alleges the Planning Commission's reliance on a factually sufficient, but legally deficient traffic impact study and wetlands delineation amounts to an abuse of discretion for the entirety of the Planning Commission's decision to approve LyonJay's preliminary plat.[2] As a preliminary matter, Appellant raised the wetlands delineation issue for the first time on appeal to the Circuit Court, having failed to present the issue before the Planning Commission. Therefore, Appellant failed to preserve the wetlands delineation issue for appellate review.

In furtherance of the objective to shift the focus to an error of law standard, Appellant recites the same arguments against the evidentiary sufficiency of the traffic impact study and wetlands delineation it presented to the Circuit Court, but now buries those same arguments within liberally used block quotes of statues, ordinances, and regulations. Between and among these pages of baldly stated law, the true issue on this appeal remains: arguments on the sufficiency or adequacy of evidence in the record to support a Planning Commission's decision are still arguments regarding the evidence considered by the Planning Commission. The fact that this consideration of evidence did not culminate in the result sought by the Appellant does not advance

[2] As a preliminary matter, Appellant alleges legal deficiencies, and previously factual deficiencies, with the delineation and study but failed to produce any delineations or studies of their own in opposition.

its position now that it attempts to focus the consideration of that evidence as legally deficient amounting to an error of law.

The Planning Commission's consideration of the wetlands delineation and the traffic impact study is neither fatal to the decision for approval nor warrants reversal. The evidence in the record shows the Planning Commission and the Planning Commission Staff considered hundreds of pages of documents; written public comment in support and opposition, including from CQRL members; and public oral argument in support and opposition, including from CQRL members. (*Order*, pp. 5, 8). The Planning Commission took the totality of available evidence on the record and the applicable law to balance competing interests and effectuate those competing interests into approving a preliminary plan. Appellant's allegations taken to fruition would have this Court sit as a city planner by determining what evidence the Planning Commission gave weight, instead of the established "any evidence" standard, and considering whether the Planning Commission was legally entitled to rely upon the evidence before it only after determining the legal sufficiency of that evidence.

Appellant candidly provides an example of the absurdity of unnecessarily becoming entangled in legal standards and technical profundity of definitions while arguing for the very same strict legal and definitional adherence. While advocating for required definitional precision of "waters of the United States" in the context of wetlands delineations, Appellant notes the term of art "has a tortured regulatory and judicial history" but that history is "not relevant to this appeal." (*CQRL Initial Brief*, p. 18, n. 8). Deferential standards, as Appellant utilizes and acknowledges for the sake of logical consistency of its arguments, are legally afforded to the Planning Commission's decisions for the same reasoning. Similarly, Appellant recognizes the LDR authorizes a traffic engineer discretion to modify a study area when performing a traffic impact

study but argues for strict compliance to a legal standard that may create a legally sufficient but practically untenable study for the subject rural area. (*Id.*, p. 26; *LDR,* Article 9.2; *Traffic Impact Study*). Practicalities of development and creating informative delineations and studies reflecting the actual realities of proposed developments require deference, as built into the LDR, and recognized by South Carolina law to planning commissions when strict technical compliance would create a result so removed from the realities these delineations and studies attempt to evaluate. *See South Carolina Board of Dental Examiners v. Breeland*, 208 S.C. 469, 480, 38 S.E.2d 644, 650 (1946) ("A choice of language in a act will not be construed with literality when to do so will defeat the lawmakers' manifest intention, and a court will reject the ordinary meaning of words used in a statute when, to accept the ordinary meaning, will lead to a result so plainly absurd that it can not possibly have been intended by the legislature.").

Even accepting Appellant's argument regarding errors of law and the "plain language of the statute" standard, the plain language of the LDR, Article 9 governing traffic impact studies allows the consideration of up to 3 intersections within the study area but *does not require* the consideration of 3 intersections within the study area. Appellant alleges not including 3 intersections renders the traffic impact study legally deficient and considering the deficient study likewise renders the Planning Commission's decision deficient. LDR, Article 9.2(A) states that when a traffic impact study is required, the study area "will be limited to a maximum of 3 peak hours and not to exceed adjacent or nearby 3 intersections within a ½ mile radius from the property boundary." If the Greenville County Council intended to require that a traffic impact study include 3 intersections, Article 9 would state something akin to "and *must* include 3 nearby or adjacent intersections . . . ." Instead, the plain language in Article 9 twice uses the "not to exceed" language. Therefore, a traffic impact study may include any number of intersections up to 3 within the study

area, including zero intersections. As noted during public oral comment before the Planning Commission, how many intersections and which intersections are to be included is determined by the South Carolina Department of Transportation (if state roads are included) and the Greenville County Traffic Engineer. (*Meeting Minutes, May 25, 2022*, pp. 12-13).

Appellant anticipatorily attempts to counter this argument by contending that the language in LDR, Article 9.2(A) giving the Greenville County Engineer discretion to increase the radius from ½ mile to ¾ mile means that 3 intersections are required for a traffic impact study. That language reads: "However, the study area may be expanded in the discretion of the County Traffic Engineer, if 3 intersections are not available within a ¾ mile from the property boundary." If the study area of ½ mile has fewer intersections than the traffic engineer wants for the study, he can expand the radius to ¾ mile to bring in another intersection. This expansion is completely discretionary. The Traffic Engineer is not required to expand the study area if there is only one intersection in that area. Again, if the County Council wanted to force 3 intersections to be included, the ordinance would not have said that the traffic engineer "may" expand the study area – it would express certainty like "must" expand the study area.

Appellant also argues that the study area included two non-existent intersections to comprise the alleged 3 "required" intersections. (*Traffic Impact Study*, pp. 2, 8-10, 12-13). However, these two "intersections" are actually access points for the proposed subdivision. These access points are not intersections as defined or considered as part of the study area. The traffic impact study did not require 3 intersections for legal sufficiency, nor does the inclusion of the access points convert them into intersections to bolster Appellant's argument for the need of 3 intersections. As indicated by the discretion built into the LDR and South Carolina law for local municipal bodies, the traffic impact study process is meant to be local with engineers trained to

determine the best course for a study. Courts, removed from the study area, are not intended to parse out intersections in lieu of local engineers physically present in the study area and second guess every part of the decision process.

Additionally, Appellant cannot show an error of law under the LDR that a required riparian buffer was excluded from the wetlands delineation using either the definition of "waters of the state" or "waters of the United States." LDR, Article 22.3.5(E) establishes a "minimum fifty-foot riparian buffer…on all waters of the state" for delineations. However, Appellant fails to show or allege that a required riparian buffer on any definition of "waters" in the wetlands delineation is missing. Appellant did not raise the riparian buffer issue at the public meeting before the Planning Commission and have not introduced opposing evidence that a riparian buffer is missing through testimony, their own wetlands delineation, or another form of competing evidence. Appellant merely argues that the definition of considered "waters" was in error and therefore any consideration of the delineation as evidence creates error without providing any evidence to support the conclusion that the ultimate requirement for a riparian buffer is nonetheless satisfied. Practically, this project is at the preliminary plan stage. If additional waters are discovered on the land to be developed, the LDR requirement for a riparian buffer for those waters is still applicable and enforceable. In either instance, Appellant cannot show an error of law or abuse of discretion with the consideration of riparian buffers as they cannot show additional buffers are needed. All evidence on the record shows that all waters present have a fifty-foot buffer as contemplated by the LDR.

Whether under an "any evidence" standard or an "error of law" standard, the Planning Commission's decision is still granted deference as it will not be overturned unless Appellant can show no evidentiary support or an abuse of discretion. *Town of Hollywood*, 403 S.C. 466, 744

S.E.2d 161, *Kurschner*, 376 S.C. 165, 656 S.E.2d 326 (reviewing courts should not interfere with a planning commission's decision unless the appellant can show there is no evidence to support it or that the decision is arbitrary and capricious as an error of law). In other words, courts should avoid second-guessing the legislative decisions of the local officials under either standard. The Planning Commission's decisions are made as a collective and decisions made in this fashion are the product of debate and compromise. Again, arguments on the sufficiency or adequacy of evidence are still arguments regarding evidence considered by the Planning Commission. The Appellant's opposing viewpoint to that evidence does not constitute an error of law in the Planning Commission's consideration and determination of that evidence. Whether the standard of review is grounded in fact, law, or fact concealed in law as with this appeal, the Appellant fails to show the Planning Commission's decision is unsupported by evidence nor arbitrary, capricious, had no reasonable relation to a lawful, purpose, nor that the Planning Commission abused its discretion. Therefore, this Court should affirm the Planning Commission's decision and dismiss Appellant's appeal.[3]

II. The Circuit Court correctly concluded that Appellant received due process during the consideration and approval of the River Preserve preliminary plan.

Appellant alleges a lack of due process because of the asserted unavailability of preliminary plan documents prior to the May 25, 2022, public Planning Commission meeting. The Circuit Court correctly rejected this argument as LyonJay's plans and the revisions were a matter of public

[3] Appellant summarily argues the Circuit Court erred by not opining on all issues Appellant raised on appeal. However, this argument is without merit. *See, e.g., Dreher v. S.C. Dep't of Health & Env't Control,* 412 S.C. 244, 250, 772 S.E.2d 505, 508 (2015) ("[A]n appellate court may affirm the lower court's decision for any reason appearing in the record. [T]he prevailing party may—but is not required to—raise additional sustaining grounds to support the lower court's decision."); Rule 220(c), SCACR ("The appellate court may affirm any ruling, order, decision or judgment upon any ground(s) appearing in the Record on Appeal.").

record, available for review and inspection, prior to the meeting. Appellant had the opportunity, and used the opportunity, to oppose the preliminary plan prior to the meeting during the public comment stage and then again at the public meeting before the Planning Commission. Appellant was aware of LyonJay's plans and presented opposition to those plans in writing prior to the public meeting. At the meeting, participants extensively debated the preliminary plan, including CQRL members who appeared, again presenting their opposing position. Appellant's allegation of a lack of due process because of the perceived timely unavailability of supplemental documents that were on public record and available for review is without merit. Appellant had meaningful opportunities to be heard, and used those opportunities, thereby satisfying the fundamental protections of due process.

The broad scope of procedural due process imposes constraints on governmental decisions which deprive individuals of liberty or property interests within the meaning of the Due Process Clause of the Fifth or Fourteenth Amendment of the United States Constitution. *Mathews v. Eldridge*, 424 U.S. 319, 332, 96 S. Ct. 893, 47 L. Ed. 2d 18 (1976). The fundamental requirements of due process include notice, an opportunity to be heard in a meaningful way, and judicial review. S.C. Const. Art. 1, § 22; *Stono River Envtl. Protection Ass'n v. S.C. Dep't of Health and Envtl. Control*, 305 S.C. 90, 94, 406 S.E.2d 340, 342 (1991). Due process does not require a trial-type hearing in every conceivable case of government impairment of a private interest. *First Fed. Sav. & Loan Ass'n of Walterboro v. Bd. of Bank Control*, 263 S.C. 59, 65, 207 S.E.2d 801, 804 (1974) (quoting *Cafeteria and Restaurant Workers Union v. McElroy*, 367 U.S. 886, 894, 81 S. Ct. 1743, 6 L. Ed. 2d 1230 (1961)). Rather, due process is flexible and calls for such procedural protections as the particular situation demands. *S.C. Dep't of Soc. Servs. v. Wilson*, 352 S.C. 445, 452, 574 S.E.2d 730, 733 (2002).

As Appellant acknowledges in briefing, the South Carolina Supreme Court provided guidance on the parameters of due process parties are entitled during a planning commission proceeding. *Kruschner*, 376 S.C. 165, 656 S.E.2d 346. The court reasoned that "due process does not require the full gamut of rules and procedures to which the [interested property holders] claim they were entitled." *Id.,* 376 S.C. at 172, 656 S.E.2d at 350. The court recognized that the South Carolina legislature expressly granted discretionary authority in the area of local planning to the planning commission and recognized that a decision on a subdivision plan, as is at issue in the current case, is "an exercise of discretionary authority, as opposed to adjudicatory power." *Id.* Interested property owners subject to the subdivision plan alleged a due process violation before the court. The court reviewed due process protections and held that "[t]he fundamental requirements of due process include notice, an opportunity to be heard in a meaningful way, and judicial review." *Id.*, 376 S.C. at 171, 656 S.E.2d at 350. The court rejected the parties' allegations and determined they received due process after being afforded "a meaningful opportunity to be heard." *Id.*, 376 S.C. at 173, 656 S.E.2d at 350.

In the current case, Appellant's due process argument hinges on the alleged unavailability of LyonJay's revised plans prior to the May 25, 2022, meeting. Based on the guideposts of established South Carolina law, due process requires only that an applicant to the Planning Commission or, as Appellant is classified, an interested third-party, receive notice and an opportunity to be heard before the Planning Commission makes a final decision. As with the parties in *Kruschner*, Appellant is not entitled to notice and the opportunity to be heard at each level of the subdivision decision review process.

Appellant received, and used, meaningful opportunities to be heard prior to the Planning Commission's decision. Appellant submitted written public comment to planning commission

staff during the public comment period. Parties aligned with Appellant's position joined in written public comment. At the May 25, 2022, meeting, Appellant was represented by multiple members and offered a presentation to the Planning Commission. In addition, the Appellant has been provided judicial review at the circuit court level and now to this Court.

Appellant nonetheless alleges a denial of due process because LyonJay supplemented its preliminary plan prior to the Planning Commission meeting but after the applicant submittal deadline. The original preliminary plan, and prior revisions, were submitted and available prior to the applicant submittal deadline and Appellant opposed those plans as well. Appellant admits that these plan revisions were considered, reviewed, discussed, and accepted at the public meeting on May 25, 2022. (*CQRL App*., ¶¶ 21-22). Practically, the LDR and parties appearing before the Planning Commission, contemplate that an initial subdivision plan will be revised prior to a planning commission meeting. LDR, Article 3.3.3 ("It is the revised plan that is submitted for the Planning Commission's review and approval, hold or denial."). Additionally, LDR Article 1.6.1 specifically allows the Planning Commission to deviate from its subdivision review calendar if "agreed upon by both the applicant and the Commissioners." Despite the LDR, common practice providing for revisions, and the public availability of these revisions, Appellant alleges this perceived lack of timely notice is a foundational due process violation.

Notwithstanding notice of the preliminary plan, provision of a public forum and participation within that forum, Appellant claims that it suffered prejudice as a result of the alleged untimely supplemental revised plan. To establish a procedural due process claim, Appellant must show that the deprivation caused it substantial prejudice. *Tall Tower, Inc. v. S.C. Procurement Review Panel*, 294 S.C. 225, 233, 363 S.E.2d 683, 687 (1987). Appellant fails to show any substantial prejudice, any effect this prejudice exerted, what damages the prejudice caused, or how

any such prejudice rose to the height of a due process violation. Despite the plan having changed from what Appellant may have anticipated would be considered for review at the May 25, 2022, Planning Commission meeting, no participants, including Appellant representatives, contemporaneously raised the issue at the May 2022 meeting. Appellant did not argue to the Planning Commission that the change left them with no meaningful opportunity to be heard or without notice. The actual supplemental plan submitted prior to the May 2022 meeting removed some creeks and water ways that were determined not to exist after LyonJay's environmental consultant visited the property for the wetlands delineation. Appellant cannot now show substantial prejudice since they still have presented nothing that shows that a required riparian buffer is missing.

The Planning Commission did not preclude Appellant from receiving updates or educating itself on the current revisions of the preliminary plan prior to the May 2022 meeting. Affidavit testimony in another Greenville County Planning Commission appeal, which the Circuit Court considered in its order, explains the process for submittal and resubmittal record updates. (*Order*, pp. 6-7; *Jeffers-Campbell Aff.*). A Greenville County Subdivision Administration employee established that accepted subdivision applications generate a file and a distinct file number. The contents of these files are available to the public from the opening of the file. The County Subdivision Administrator and her staff maintain and update these files as public records, which any one can view at the County Square Greenville Offices during the County's normal operating hours. As the application progresses, developers file multiple versions of preliminary plans as they make changes. These changes and updated plan versions are kept in the physical file and are available for review, even if not yet uploaded to the County's website. Appellant or any member

of the public could visit, contact, or call the County's office to confirm plans prior to a Planning Commission meeting.

In sum, as the lower court correctly concluded, Appellant has not demonstrated a due process violation that warrants the reversal of the Planning Commission's approval of the preliminary plan. Therefore, Planning Commission respectfully requests this Court affirm the Planning Commission's decision and dismiss Appellant's appeal.

CONCLUSION

Based on the foregoing discussion and analysis, the Respondent Greenville County Planning Commission respectfully requests that the Court affirm the Order of the Circuit Court Judge Edward R. Miller, which affirmed the May 25, 2022, decision of the Greenville County Planning Commission.

Respectfully submitted,

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