

EXHIBIT W

Identification of Wetlands

Company: United Consulting
Development: Blue Ridge Point
Development Location: 2095 Oakleaf Drive
County: Lancaster Acres: 8.429

 I certify that the development listed above **does not** contain jurisdictional and non-jurisdictional wetlands.

X I certify that the development listed above **does** contain jurisdictional and/or non-jurisdictional wetlands and the proposed development will not disturb the wetlands. The wetlands are ~0.74 (acres) in size, rendering the buildable percentage at 90.98%. * PLEASE REFER TO ATTACHED WETLAND REPORT.

I have provided the following:

1. National Wetlands Inventory (NWI) map
2. My credentials that qualify me to make this determination.

Financial Interest: Neither I nor the company I work for have any financial interest in the proposed LIHTC application other than in the practice of our profession.


Signature and Certification of Wetlands Professional

5/19/25
Date

David Huettner
Name of Wetland Professional

Blue Ridge Family I, LP
Signature and Certification of Development Owner

5/20/205
Date

Wilfals
Name of Developer



UNITED
CONSULTING

REPORT

**For Blue Ridge Family I,
LP c/o Prestwick
Development Company,
LLC**

Preliminary Aquatic Resource
Investigation
Blue Ridge Point
2095 Oakleaf Drive
Lancaster, Lancaster County, South
Carolina



April 7, 2025

Blue Ridge Family I, LP
c/o Prestwick Development Company, LLC
3715 Northside Parkway, NW Building 200, Suite 175
Atlanta, GA 30327

Attn: Mr. Casey Craven

Via Email: casey@prestwickcompanies.com

RE: Preliminary Aquatic Resource Investigation
Blue Ridge Point
2095 Oakleaf Drive
Lancaster, Lancaster County, South Carolina
Project No. PRWCK-25-SC-09301-01

Dear Mr. Craven:

Per your request, United Consulting has completed a preliminary investigation of aquatic resources on the above-referenced property, hereinafter referred to as the Subject Property. The Subject Property consisted of a 8.429-acre tract located southwest of the intersection of Oakleaf Drive and Woodland Drive in Lancaster, Lancaster County, South Carolina. The general site location is shown on Figure 1 of this report.

APPROACH:

United Consulting's evaluation included conducting background research of available topographic, wetland, and soils maps for the Project Site, as well as conducting an on-site investigation of the property for wetlands and other jurisdictional waters of the U.S. in accordance with the U.S. Army Corps of Engineers (USACE) 1987 *Wetland Investigation Manual* and the *Regional Supplement to the Corps of Engineers Wetland Investigation Manual: Eastern Mountains and Piedmont Region*, dated April 2012. Waters were also evaluated in accordance with the current Waters of the U.S. (WOTUS) rule, which was updated in the Federal Register 88 FR 61964, effective date September 8, 2023. According to the Supreme Court decision that resulted in these revised rules, in general, WOTUS must be considered "relatively permanent", and wetlands must have a "continuous surface connection" to relatively permanent waters to be considered jurisdictional. The USACE and Environmental Protection Agency (EPA) are currently updating the WOTUS rules to comply with the Sackett decision.

IN OFFICE RESEARCH:

The U.S. Geological Survey National Topographic Map of the area was reviewed prior to the site visit. No streams or wetlands were mapped on the Subject Property. No prominent drainage swales were mapped on the Subject Property. A stream was mapped off the Subject Property to the west. A copy of the USGS topographic map showing the approximate Subject Property boundaries is attached as Figure 2.

The National Wetland Inventory (NWI) Digital Map was reviewed to determine if any known wetlands or other jurisdictional waters were mapped on the Subject Property. No wetlands or other aquatic resources were mapped on the Subject Property. A copy of the NWI map is attached as Figure 3.

The USDA Digital Web Soil Survey was reviewed to determine if any known hydric soils have been mapped on the Subject Property. The soil survey map indicated three map units located on the Subject Property. These included the following:

- HeC3: Herndon silty clay loam, 6 to 10 percent slopes, severely eroded
- MaB: Masada and altavista soils, 2 to 6 percent slopes
- We: Wehadkee and Chewacla soils

The Wehadkee soils are considered hydric soils. These soils were located on a very small area on the southeastern boundary of the Subject Property. None of the other soil map units are considered hydric soils or contain hydric soil components. A copy of the soil survey map is attached as Figure 4.

Utilizing rain gauges from the area (CATAWBA, SC) United Consulting completed the USACE Rainfall Documentation spreadsheet. Using rainfall data from January, February, and March, the area received average rainfall at the time of the site visit. In the week prior to the site visit, the area received 0.38 inches of rainfall.

FIELD DELINEATION:

A field investigation was conducted on the Subject Property on April 3, 2025. United Consulting walked the Subject Property to find features which may be considered jurisdictional waters. For features which may be classified as jurisdictional, United Consulting conducted limited mapping of the identified features using a Trimble DA2 global positioning system (GPS). At the time of the site reconnaissance, the Subject Property was wooded land developed with a detention pond on the southwestern portion of the Subject Property.

A detention pond was observed on the southwestern portion of the Subject Property. This area contained standing water and wetland vegetation. According to review of historical documents, this detention pond was constructed in an upland area in 2021. Based on this information, this area would not be considered a jurisdictional feature. No other areas of standing water, wet depressions, saturated surface soils, or other characteristics of suspected aquatic features were observed on the Subject Property.

CONCLUSIONS AND RECOMMENDATIONS:

United Consulting has completed a preliminary evaluation of the Subject Property for aquatic resources. This included a field determination and preliminary GPS mapping of the location of the features on the Subject Property. Aquatic features such as streams or wetlands which we believe are regulated as federal jurisdictional waters by the USACE under Section 404 of the Clean Water Act were not observed on the Subject Property. The observed detention pond appeared to be excavated in an upland area and thus should not be considered WOTUS.

LIMITATIONS:

The information provided in this report represents our opinion based on professional experience. Please note that official determinations regarding federal jurisdictional waters are made by the USACE. No warranty is expressed or implied.

We appreciate the opportunity to assist you with this project. Please call if you have any questions concerning this report, including questions regarding permitting.

Sincerely,

UNITED CONSULTING



Jenna R. Forte
Wetland Specialist



David P. Huetter
Director of Ecological Services

JRF/DPH/co

SharePoint: PRWCK-25-SC-09301-01

Attachments:

Figure 1 – Site Location Map
Figure 2 – USGS Topographic Map
Figure 3 – USFWS Wetland Inventory Map
Figure 4 – USDA Soil Survey Map
Figure 5 – Aquatic Features Map
Site Photographs



Subject Property



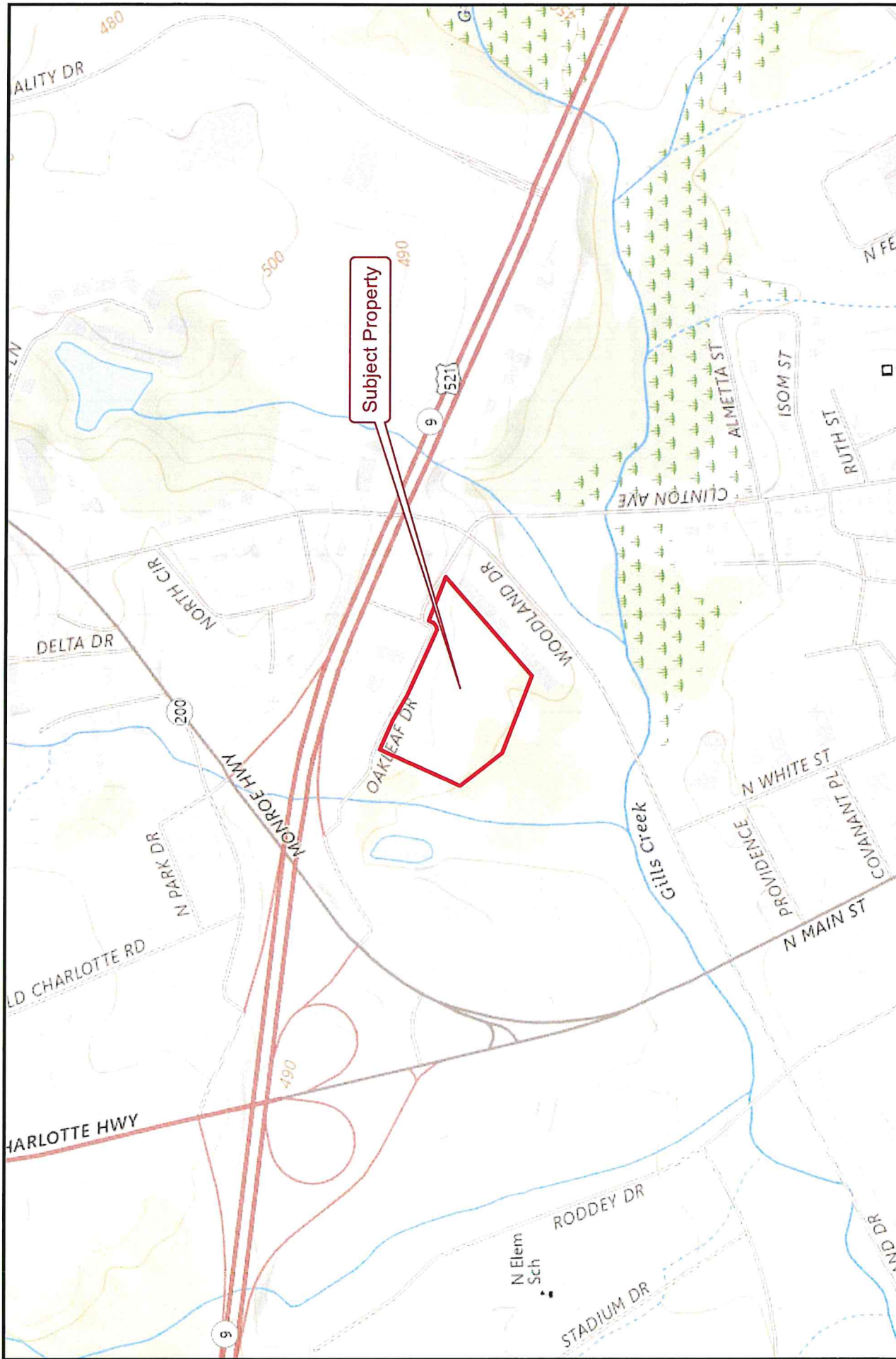



 UNITED CONSULTING	Figure Scale		Prepared: JF		Title: Site Location Map	
	 0 450 900 1 inch = 600 feet		Checked: DH		Project: Blue Ridge Point	
			Date: 03/17/25		Project No. PRWCK-25-SC-09301-01	
					Client: Prestwick Development	

FIG. 1



 UNITED CONSULTING	<div>Figure Scale</div> <div><div><div>N</div><div></div></div><div><div>0</div><div></div><div>450900</div></div><div>1 inch = 600 feet</div></div>	Prepared:	JF	Title:	USGS Topographic Map	FIG. 2
		Checked:	DH	Project:	Blue Ridge Point	
		Date:	03/17/25	Project No.	PRWCK-25-SC-09301-01	
				Client:	Prestwick Development	



 UNITED CONSULTING	Figure Scale		Prepared:	JF	Title:	National Wetlands Inventory Map	FIG. 3
	 N 1 inch = 200 feet		Checked:	DH	Project:	Blue Ridge Point	
			Date:	03/17/25	Project No.	PRWCK-25-SC-09301-01	
					Client:	Prestwick Development	



Map Unit Symbol	Map Unit Name
HeC3	Herndon silty clay loam, 6 to 10 percent slopes, severely eroded
MaB	Masada and altavista soils, 2 to 6 percent slopes
We	Wehadkee and Chewacla soils

Figure Scale



N 0 150 300

1 inch = 200 feet

Prepared:	JF	Title:	Soil Survey Map
Checked:	DH	Project:	Blue Ridge Point
Date:	03/17/25	Project No.	PRWCK-25-SC-09301-01
		Client:	Prestwick Development

FIG. 4



 UNITED CONSULTING	Figure Scale  0 110 220 1 inch = 150 feet	Prepared: JF	Title: Preliminary Aquatic Features Map	FIG. 5
		Checked: DH	Project: Blue Ridge Point	
		Date: 04/04/25	Project No.: PRWCK-25-SC-09301-01	
			Client: Prestwick Development	

Photographic Record



Photo 1: View of the detention pond on the southwestern portion of the Subject Property.

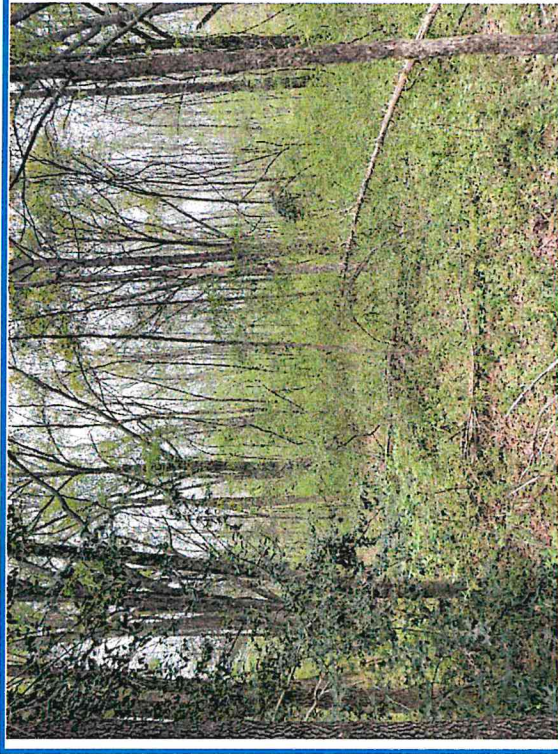


Photo 2: Typical view of the Subject Property.



Photo 3: View of the western adjoining property.



Photo 4: View of the southern adjoining property.

Photographic Record

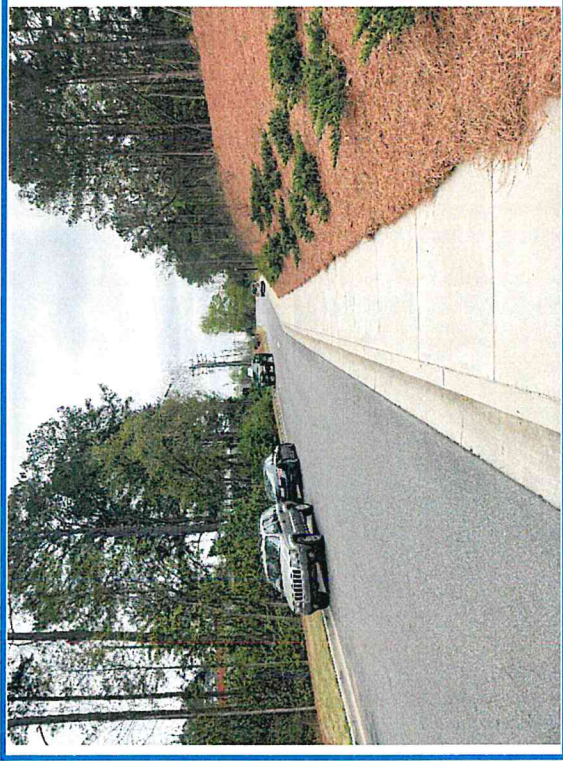


Photo 5: View of Oakleaf Drive to the north of the Subject Property.

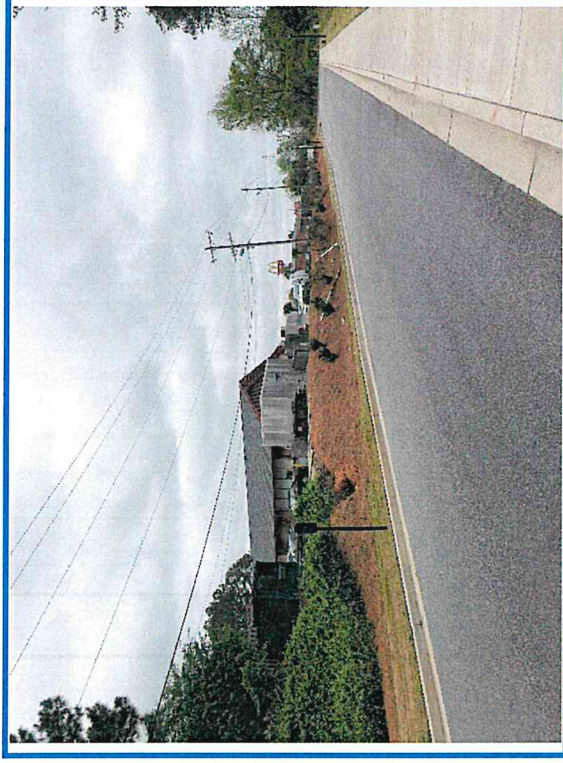


Photo 6: View of the northern adjoining properties.

DAVID P. HUETTER

Location
Norcross, Georgia
Years of Experience
Firm - 30 Total - 31
Certification
GSWCC - Level 1A Certified-00000165284
Education
BS Forest Resources Majoring in Wildlife Biology University of Georgia 1993
Specialized Training
<ul style="list-style-type: none"> • 36 Hour Wetland Delineation Course • Red-Cockaded Woodpecker, Identification and Management • Wetland Plant Identification Course • 40 Hour OSHA Training • Fundamentals of Erosion and Sedimentation Control • Restoring Forested Wetlands Workshop • Applied Fluvial Geomorphology • Stream Restoration Design Principles • NPDES Level 1A Inspector • Stream Restoration Project Implementation and Evaluation • Endangered Species – Section 7 Consultation • Identification of Intermittent and Perennial Streams

Summary

A senior stream, wetlands and ecological authority, Mr. Huetter has conducted stream and wetland assessments, delineations, and permitting throughout the Southeastern US. His experience includes field identification, preparation of stream and wetland permit applications, analysis and development of riparian mitigation plans, implementing stream and riparian restoration mitigation, supervising wetland enhancement and restoration projects, and monitoring wetland and stream mitigation sites. Mr. Huetter has performed vegetation and wildlife research for county, state, and federal government agencies, as well as for private firms and individuals. This includes mapping of wetlands and vegetative communities, monitoring and surveying for protected species, and conducting research of several wildlife species and their related habitat. Mr. Huetter has also conducted watershed assessments to evaluate sedimentation sources, channel scour and erosion control, water quality, stream stability, and general impacts to aquatic systems.

Mr. Huetter has extensive knowledge of standard field assessment protocols including the U.S. Army Corps of Engineers *Wetland Delineation Manual*, the USACE *Regional Supplement: Eastern Mountains and Piedmont Region*, the Georgia Environmental Protection Division guidance – *Field Guide for Determining the Presence of State Waters that Require a Buffer*, and the North Carolina Division of Water Quality – *Methodology for Identification of Intermittent and Perennial Streams and Their Origins*. He has provided several Wetland training seminars to clients and to professional organizations such as the American Consulting Engineers Council and local government entities.

Project Experience

COWETA INDUSTRIAL PARK – NEWNAN, COWETA COUNTY, GEORGIA. Mr. Huetter served as the Team Leader on this project that consists of a large industrial park development located on over 700 acres. The overall project includes a 2.5-mile road through the property along with several industrial buildings. United Consulting was contracted to conduct a field delineation for streams, wetlands, and other aquatic resources. As the parkway has been constructed in phases over many years, United Consulting has been involved with updating and revising the permits as each phase of road construction has occurred. Due to the amount of impacts to waters of the U.S., compensatory mitigation has been required and United Consulting has calculated the required mitigation credits and coordinated the purchase of required credits. Recently, United Consulting was contacted to assist in the evaluation of erosion issues to provide analysis and recommendations relative to apparent sediment loss from the site into the nearby wetland systems. We conducted a field assessment of the area to measure sediment accumulations within the wetland area and provided recommendations for remedial actions and maintenance.

FAYETTE QUARRY – TYRONE, FAYETTE COUNTY, GEORGIA. United Consulting was contracted to conduct a wetland and stream delineation, GPS mapping, and preliminary road layout for the expansion of an existing quarry. Mr. Huetter led the field team that completed the field delineation of the expansion area. The limits of the identified streams, ponds, and wetland systems were mapped using a handheld GPS and the mapping data was then transferred to a base plan. Mr. Huetter then prepared a road layout plan, conducted field measurements on the streams and provided profile drawings for the planned culverts and road crossings. He also prepared the USACE jurisdictional request and permit application, and met with the USACE on the site to confirm the field conditions. Permit approval for the project was obtained without delays.

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DAVID P. HUETTER CONTINUED

BRASELTON INDUSTRIAL SITE, JACKSON COUNTY, GEORGIA. United Consulting was contracted to conduct the field assessments and prepare the permit documents necessary for development of this industrial tract. The property contained several drainage features with various channel conditions. Different reaches of the channels were evaluated in the field to identify the limits of the ephemeral, intermittent and perennial streams. Following the initial field scoring, a site visit with the City assessor was conducted to review the scoring and to discuss the field conditions. A site visit was also conducted with representatives with the USACE to verify limits of the stream features. Mr. Huetter prepared the permit application documents, which were submitted to the USACE for approval. Final approval was received for the proposed impacts and site development was able to proceed as scheduled.

LAKE LANIER ISLANDS – BUFORD, GEORGIA. United Consulting was contracted to assist with the analysis of effects and prepare an EA for proposed improvements and expansion of the Lake Lanier Islands Beach and Waterpark facility as well as other areas within the Lake Lanier Islands property. This included an analysis of the existing conditions and a review of the proposed Master Plan. Mr. Huetter conducted field evaluations of the property to document the existing conditions and then assisted in the analysis of the proposed plan and preparation of the EA report. Mr. Huetter conducted the final review of the EA and also consulted with the USACE regarding review of the EA. The EA was approved and a Finding of No Significant Impact was received.

THE POINTE AT OAKMONT – CENTRE, ALABAMA. Mr. Huetter served as the Project Manager for this proposed multi-family development. The evaluation included conducting a wetland delineation, GPS mapping of wetlands, and conducting a Phase I Environmental Assessment. Mr. Huetter also coordinated with the client and the surveyor, and conducted a follow up field assessment regarding the adjoining wetland systems and evaluation of the property boundaries and site access.

COMMERCIAL DEVELOPMENT – BARROW COUNTY, GEORGIA. Mr. Huetter completed a field delineation for this proposed commercial development property. The delineation included identification of streams, wetlands, and ponds on the property. Mr. Huetter worked with the property owner and design engineer to generate a plan for the site and prepared an initial permit application to the USACE. The initial permit application was approved and the initial phases of development were completed. Following completion of the design for the remainder of the site, Mr. Huetter prepared a Section 404 Individual Permit application, which was submitted to the USACE for additional stream impacts. In addition, a stream buffer variance application was prepared for Georgia EPD approval. The Individual Permit and Buffer Variance were both approved for the development. Mr. Huetter then assisted in coordinating the purchase of compensatory mitigation credits for the impacts and later coordinated the compliance verification with the USACE.

REYNOLDS NATURE PRESERVE – MORROW, GEORGIA. United Consulting was contracted to prepare a Master Plan for long-term management of this 146-acre nature preserve. Our services included the initial data collection phase, which consisted of wetland and stream delineation, lake sedimentation surveys, GPS mapping, stream morphology analysis, protected species surveys, and vegetation surveys. The lake sedimentation surveys included evaluating 5 ponds on the property and providing management recommendations for each. Mr. Huetter was responsible for the oversight of and assisting with the field data collection activities. The field data was then analyzed to present a report outlining the findings of the field investigations and provided recommendations for future use and management of the preserve. Natural resource management recommendations of the plan included dredging of some of the on-site lakes, annual stream surveys to track changes in stream morphology, and exotic vegetation management. Mr. Huetter provided technical information for the lake dredging and was a member of the review committee for the selection of a contractor to conduct the lake dredging.

VILLAGE AT ROCK SPRINGS – AUBURN, ALABAMA. Mr. Huetter served as the project biologist for this proposed development where concerns for impacts to protected bats was identified. Mr. Huetter conducted a field assessment of the property for the presence of bat habitat, specifically focused on roosting trees and foraging habitat. The site conditions were evaluated, including conducting GPS mapping of possible roosting trees and consulting with the U.S. Fish and Wildlife Service. Approval was received from the USFWS that the project would not have a significant effect on bats or bat habitat.

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DAVID P. HUETTER CONTINUED

STREAM RESTORATION – TRUSSVILLE, ALABAMA. Mr. Huetter served as the Project Manager and Team Leader for this proposed stream restoration project. Working with a local engineer and the City of Trussville, Mr. Huetter developed a plan to drain an old impoundment and restore the stream through the valley. Mr. Huetter prepared the design for the restoration and worked with United Consulting's cad manager to generate the design drawings. Following completion of the design, a permit application was submitted to the U.S. Army Corps of Engineers for approval. The permit was approved, and Mr. Huetter relayed the design to the contractor and conducted field visits to assess implementation of the design. Due to unforeseen subsurface conditions, modifications of the design were required and implemented during construction. Mr. Huetter then completed two years of field monitoring to assess the stability of the stream and vegetation regeneration.

RHODES JORDAN PARK – LAWRENCEVILLE, GEORGIA. United Consulting performed a comprehensive environmental and geotechnical evaluations for this proposed park expansion and improvement project. Mr. Huetter was responsible for the oversight of the ecological work on this site. Services includes stream and wetland delineations, lake sediment evaluation, stream restoration, and permitting. The project improvements included restoration of a degraded stream and construction of a loop trail around the lake, which crossed a portion of the lake and wetlands. These improvements required permits from the USACE and the Georgia EPD. Mr. Huetter prepared the permit documents and consulted with the appropriate agencies for project approval.

CEMETERY LAKE – CITY OF PALMETTO, GEORGIA. During construction of a large industrial building, sediment loss was reported from the construction site into a downstream lake. The lake was located within a cemetery and was a serenity feature to the visitors of the cemetery. United Consulting responded quickly to the concerns and Mr. Huetter contacted the site representative of the cemetery to perform an initial site inspection. Mr. Huetter then performed a detailed sediment survey of the lake coves associated with potential source streams to assess the conditions of the lake, the inflow stream(s), and the up-gradient watershed(s). A report was provided to present the findings of the investigation. Mr. Huetter has since conducted a follow-up visit to the site to further assess the conditions of the lake, conduct laboratory analysis of water samples, and to respond to further concerns from the cemetery owners. Mr. Huetter prepared a subsequent report to outline the findings and provided expert witness testimony. He has also prepared subsequent documents to support findings and legal case.

RIVER RIDGE DEVELOPMENT – WESLEY CHAPEL, FLORIDA. Mr. Huetter completed an ecological evaluation for this proposed residential development property. The evaluation included a wetland delineation and GPS mapping of wetlands and other aquatic resources on the site. In addition, an investigation of the site was conducted to evaluate for Federal and State listed species. The field investigation identified two areas of wetlands on the site, and also identified several gopher tortoise burrows across the property. The gopher tortoise burrows were flagged and each burrow was GPS located in order to generate a burrow location map. Mr. Huetter also coordinated with the project surveyor in order to obtain a survey of the wetland boundaries and consulted with the Southwest Florida Water Management District (SWFWMD) to obtain verification of the wetland boundaries. Mr. Huetter then coordinated with a registered gopher tortoise agent and assisted with the excavation of the tortoise burrows, capture, and relocation of the tortoises on the site.