

LOWRYS ENVIRONMENTAL &
ECOLOGICAL SERVICES, LLC
311 Sliding Rock Drive
Pendleton, South Carolina 29670
Phone 803-992-0910

1 May 2026

Mr. Andrew M. Cope
JM Cope Construction, Inc.
199 South Cherry Road
Rock Hill, South Carolina 29732

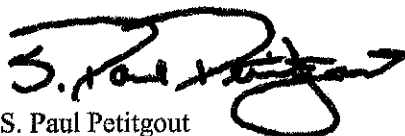
**RE: Jurisdictional Waters of the US (Wetland and Stream) Evaluation
Gaffney Mill Apartments Site
City of Gaffney, Cherokee County, South Carolina**

Dear Mr. Cope:

Lowrys Environmental & Ecological Services, LLC (LEES) has completed a jurisdictional waters of the US (wetland and stream) evaluation for the property known as the Gaffney Mill Apartments Site (Parcel 081-15-00-003.000), located at the intersection of W. Buford Street and S. Oliver Street in the town of Gaffney, Cherokee County, South Carolina. LEES reviewed the site for the presence of jurisdictional wetlands and streams on April 27, 2026. During this evaluation, no jurisdictional wetland or stream features were located within the property. The site is comprised entirely of upland areas that are not subject to Sections 404/401 of the Clean Water Act. We have included all appropriate mapping (USGS 1:24,000 topographic map; local GIS aerial and topographic map; USDA NRCS Soil Map of the area; and the USFWS National Wetlands Inventory map of the area. Additionally, we have included my Curriculum Vitae and Form W for your use.

Should you have any questions regarding the evaluation results, please feel free to contact me. We appreciate you selecting LEES to assist with your environmental consulting needs.

Sincerely yours,



S. Paul Petitgout
President/Managing Member

Attachments



Gaffney Mill Apartments Site
City of Gaffney, Cherokee County, South Carolina
Cherokee County, SC GIS Aerial/Topographic Map

Drawn By: SPP	Date: 05/01/2026	Rev.
Project Mgr. SPP	Scale: Not to Scale	Sheet: 2

Lowrys Environmental & Ecological Services, LLC
311 Sliding Rock Drive
Pendleton, South Carolina 29670
803-992-0910



U.S. Fish and Wildlife Service

National Wetlands Inventory

Wetlands



Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

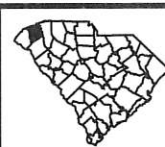
- Lake
- Other
- Riverine

Gaffney Mill Apartments Site

Scale: As Shown

Source: USFWS NWI Mapper (2026)

Disclaimer: The information depicted on this figure is for informational purposes only and was not prepared for, and is not suitable for legal or engineering purposes.



Gaffney Mill Apartments Site
City of Gaffney, Cherokee County, South Carolina
USFWS National Wetlands Inventory Map

Lowrys Environmental &
Ecological Services, LLC

311 Sliding Rock Drive
Pendleton, South Carolina 29670
803-992-0910

Drawn By: SPP

Date: 05/01/2026

Rev.

Project Mgr. SPP

Scale: As Shown

Sheet: 4

S. PAUL PETITGOUT

Lowrys Environmental & Ecological Services, LLC

311 Sliding Rock Drive
Pendleton, South Carolina 29670

803-992-0910
ppetitgout@gmail.com



Education Level:

M.S. Forest Resources
Clemson University 1997

Thesis: Landscape
Ecosystem Classification of
the Lower Terraces within
the Coastal Flatwoods
Region of South Carolina.

B.S. Forest Management
Clemson University. 1990

PROFESSIONAL EXPERIENCE SUMMARY

Mr. Petitgout has over 32 years of experience as a vegetation and landscape ecologist specializing in the areas of landscape modeling, ecological land classification, vegetation ecology, soils, natural stream morphology restoration and forest wetland ecology. Mr. Petitgout's experience as an environmental consultant includes a wide diversity of project experience such as upland and riparian landscape modeling, urban and rural stream restoration, design and construction, soil classification and mapping, wetland mitigation/restoration design, mitigation site construction oversight, mitigation bank permitting, and the preparation of NEPA documentation for several large projects. Mr. Petitgout has successfully completed all levels of training in the Rosgen stream classification and natural channel design.

PRIOR EXPERIENCE

2016 - Present: Lowrys Environmental & Ecological Services, LLC
1993-2016: Environmental Services, Inc.
1991-1993: Clemson University
1990-1991: Stone Container Corporation

LOWRYS ENVIRONMENTAL & ECOLOGICAL SERVICES, LLC

Title: President/Managing Member

Responsibilities

Mr. Petitgout is responsible for directing and managing the operations of Lowrys Environmental & Ecological Services, LLC. He was formerly responsible for directing and managing the Charlotte, North Carolina operations of Environmental Services, Inc (ESI). He has personally been involved with projects throughout the Southeastern United States and has provided project management and staff supervision for a range of natural resource analysis projects. At the project level, his participation may reach into all phases but most essentially includes client contact and quality control. Mr. Petitgout specializes in landscape level ecosystem modeling, NEPA documentation, field botanical assessments, soils mapping and classification, wetland restoration design, stream channel morphology restoration, bio-stabilization, mitigation site construction oversight, mitigation bank permitting, wetland delineation, permitting, and wildlife assessments, including endangered species ecology for many of the listed species in North Carolina, South Carolina and Georgia.

Previous Project Experience

Environmental Due Diligence: Wetland and Stream Delineation and Threatened and Endangered Species Habitat Evaluation for a proposed industrial park site in Colleton County, South Carolina.

Environmental Due Diligence: Wetland and Stream Delineation, Threatened and Endangered Species Habitat Evaluation, Section 404/401 Permitting, and Mitigation

cultural resource investigations, mitigation design and implementation including reforestation of the site, and agency coordination.

James River Wetland Mitigation Bank – Greenbrier Pocosin Site (City of Suffolk, Virginia) Large wetland mitigation bank project. Section 404/401 permitting, endangered species coordination and surveys, mitigation design and implementation including the reforestation of the site, cultural resource investigations and agency coordination.

Satilla River Wetland Mitigation Bank (Camden County, Georgia) Large wetland mitigation bank project. Section 404/401 permitting, endangered species coordination and surveys, cultural resource investigations, mitigation design and implementation including reforestation of the site, and agency coordination.

Soils Mapping for Georgia Pacific Corporation, Southeast Region: Soils Mapping of $\pm 1,000$ acres using Georgia Pacific protocols.

Natural Resource Technical Report Preparation: NEPA reports for the NC Department of Transportation for various projects: US 1 Bypass, Richmond County, North Carolina; Monroe Bypass, Union County, North Carolina; Interstate 485 Widening, Mecklenburg County, North Carolina

Threatened/Endangered Species: Habitat Evaluations for Federally Listed T&E Species for projects throughout the Southeastern United States

Environmental Due Diligence: Wetland and Stream Delineation, Threatened and Endangered Species Habitat Evaluation, permitting, and mitigation services for a ± 250 acre private development in Cabarrus County, North Carolina.

Environmental Due Diligence: Wetland and Stream Delineation, Threatened and Endangered Species Habitat Evaluation, Permitting, and Mitigation services for a ± 175 acre private development in Union County, North Carolina.

Stream Restoration Design and Construction Services – McClimon's Pond Site: Stream Restoration design and implementation of the construction, including reforestation of the mitigation site, located in Spartanburg County, South Carolina, for the South Carolina Department of Transportation.

Upstate MSW Landfill (Union County, South Carolina) – Section 404 Permitting, Endangered Species Coordination and surveys, wetland and stream mitigation, cultural resources coordination and surveys.

CERTIFICATIONS

Natural Channel Design and River Restoration (Rosgen IV), 2001, 2012
River Assessment and Monitoring (Rosgen III), 2001, 2012
River Morphology & Application (Rosgen II), 2000
Applied Fluvial Geomorphology (Rosgen I), 2000

EXHIBIT W

Identification of Wetlands

Development: Gaffney Mill Apartments

Development Location: W. Buford Street Gaffney, South Carolina

County: Cherokee Acres: ±2.2

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

 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 (acres) in size.

I have attached a National Wetlands Inventory (NWI) map identifying the development location.



Signature and Certification of Development Owner

Gaffney Mill Apartments, LLC

Name of Developer

5/4/24

Date