



UNITED
CONSULTING

REPORT

**For Resource Housing
Group, Inc.**

Preliminary Aquatic Resource Investigation
Peaks of Manning II
Kennedy Lane
Manning, Clarendon County, South Carolina



April 16, 2026

Resource Housing Group, Inc.

Mr. Sam Coats, Vice President
3350 Riverwood Parkway, Suite 800
Atlanta, GA 30339

c/o Ms. Sarah K. Niemann
Niemann Consulting, Inc.

Via Email: skn33@bellsouth.net

RE: Preliminary Aquatic Resource Investigation
Peaks of Manning II
Kennedy Lane
Manning, Clarendon County, South Carolina
Project No. RESHG-26-SC-10302-01

Dear Ms. Niemann:

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 4.23-acre tract located to the north and south of Kennedy Lane (West Rigby Street) in Manning, Clarendon County, South Carolina. The general site location is shown in Figure 1 of this report.

APPROACH:

United Consulting's evaluation included conducting background research of available topographic, wetland, and soils maps for the Subject Property, 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 Delineation Manual, Atlantic and Gulf Coastal Plain Region, dated November 2010. Waters were also evaluated in accordance with the proposed Waters of the U.S. (WOTUS) rule, which was published in the Federal Register (Vol. 90, No. 222), dated November 20, 2025. According to the Supreme Court decision in the Sackett case 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 (RPW) and be indistinguishable from the adjoining RPW to be considered jurisdictional. These proposed WOTUS rules are not yet effective but are expected to become effective in mid-2026.

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 streams or wetlands were mapped on the Subject Property. No prominent drainage swales were mapped on the Subject Property.

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 aquatic features were mapped on the Subject Property. A large freshwater wetland was mapped to the west of 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:

- Cd: Clarendon Loamy sand
- DoA: Dothan loamy fine sand, 0 to 2 percent slopes
- Fo: Foreston fine sand

The Clarendon soil and the Foreston soil contained a minor hydric soil component, Rains, which comprised two percent of each soil map unit. These soils were located on a majority of the Subject Property, excluding the southwestern portion. A copy of the soil survey map is attached as Figure 4.

United Consulting utilized the Environmental Protection Agency (EPA) Antecedent Precipitation Tool (APT) version 3.0.8 to assess weather conditions at the time of the site visit. This tool utilizes data from multiple rain gauges from the surrounding area to establish normal weather conditions for the input area and provides results of multiple established climate calculations. Based on the Water-Budget Interactive Modeling Program (WebWIMP) method, the site was visited within the wet season. The precipitation normalcy calculations indicated conditions were drier than normal at the time of the site visit. According to the rain gauge, MANNING, SC, no rainfall was recorded the week prior to the site visit.

Following completion of the in-office research, the Subject Property was then investigated for visual evidence of wetlands and other jurisdictional waters.

FIELD DELINEATION:

A field investigation was conducted on the Subject Property on April 1, 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 and grassed land, with the exception of a vacant single-family home on the southwestern corner.

A narrow wetland area was observed on the eastern portion of the Subject Property beginning at a culvert that discharged from beneath North Boundary Street. The wetland ranged from approximately two to four feet wide and contained hydric soil; however, the vegetation observed was similar to that in the upland areas. The wetland sloped west then turned north along the Subject Property boundaries where another culvert discharged into the wetland. From this point, the wetland was approximately three feet wide and contained hydric soil, and either an ordinary high-water mark (OHWM) or areas of sparse wetland vegetation. Areas of standing water were limited to concave surfaces within the feature.



The wetland then sloped west along the northern boundary of the Subject Property where, yet another culvert discharged into the wetland. The northwestern portion of the feature contained a more defined OHWM than the upgradient reaches of the ditch and portions of this reach may contain more intermittent stream characteristics during times of normal rainfall. The feature continued sloping west and off the Subject Property. Based on the linear nature of the wetland and the unnatural path that slopes along the Subject Property boundaries, it is possible that this feature was excavated in order to carry stormwater and divert surface water from the Subject Property. However, as this feature consists of hydric soils and wetland vegetation, it is United Consulting's opinion that this feature represents a jurisdictional feature under the currently applied WOTUS rules.

CONCLUSIONS AND RECOMMENDATIONS:

United Consulting has completed an investigation of potential jurisdictional features on the Subject Property. This included a field determination and limited GPS mapping of the location of the identified aquatic resources on the Subject Property. United Consulting identified a wetland area which we believe would currently be regulated as federal jurisdictional WOTUS by the USACE under Section 404 of the Clean Water Act.

Under the current rules, in our opinion, the identified wetland would be considered jurisdictional WOTUS. However, in accordance with the new (pending) WOTUS rules and the Sackett decision, the wetland identified on the Subject Property, which did not contain continuous surface water during the identified wet season, would not be jurisdictional under the new WOTUS rule (once it becomes effective). As previously noted, however, weather conditions were drier than normal at the time of the site visit. Based on these weather conditions, another site visit once the new rule becomes effective and during normal weather conditions is recommended.

Minor impacts or disturbances to WOTUS can be authorized under the nationwide permit program. In general, impacts of up to 0.05-acre of stream or 0.5-acre of jurisdictional wetland can be authorized, but requires prior approval from the USACE. In addition, compensatory mitigation will be required for impacts of 0.01-acre stream or 0.1-acre of jurisdictional wetland or more.

LIMITATIONS:

The information provided in this report and shown on Figure 5 represents our opinion based on professional experience and the site observations at the time of our site visit. Limits of aquatic resources can and do change over time. Please note that official determinations regarding federal jurisdictional waters are made by the USACE. We recommend that official determinations and proper permits be obtained prior to disturbance of these areas. 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

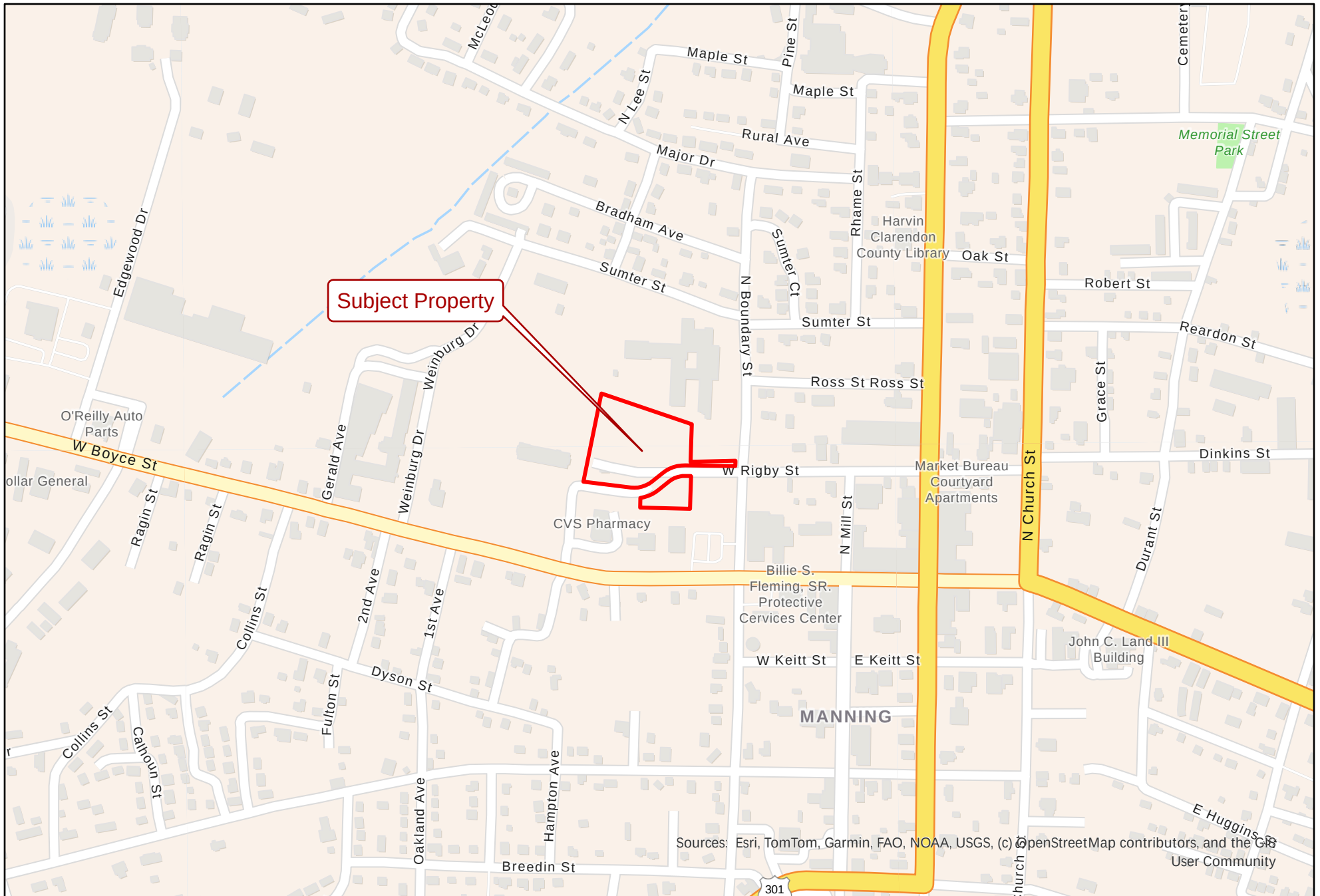
Michael G. Abernathy
Senior Wetland Specialist

JRF/MGA/ms

SharePoint: PRWCK-26-SC-10302-01

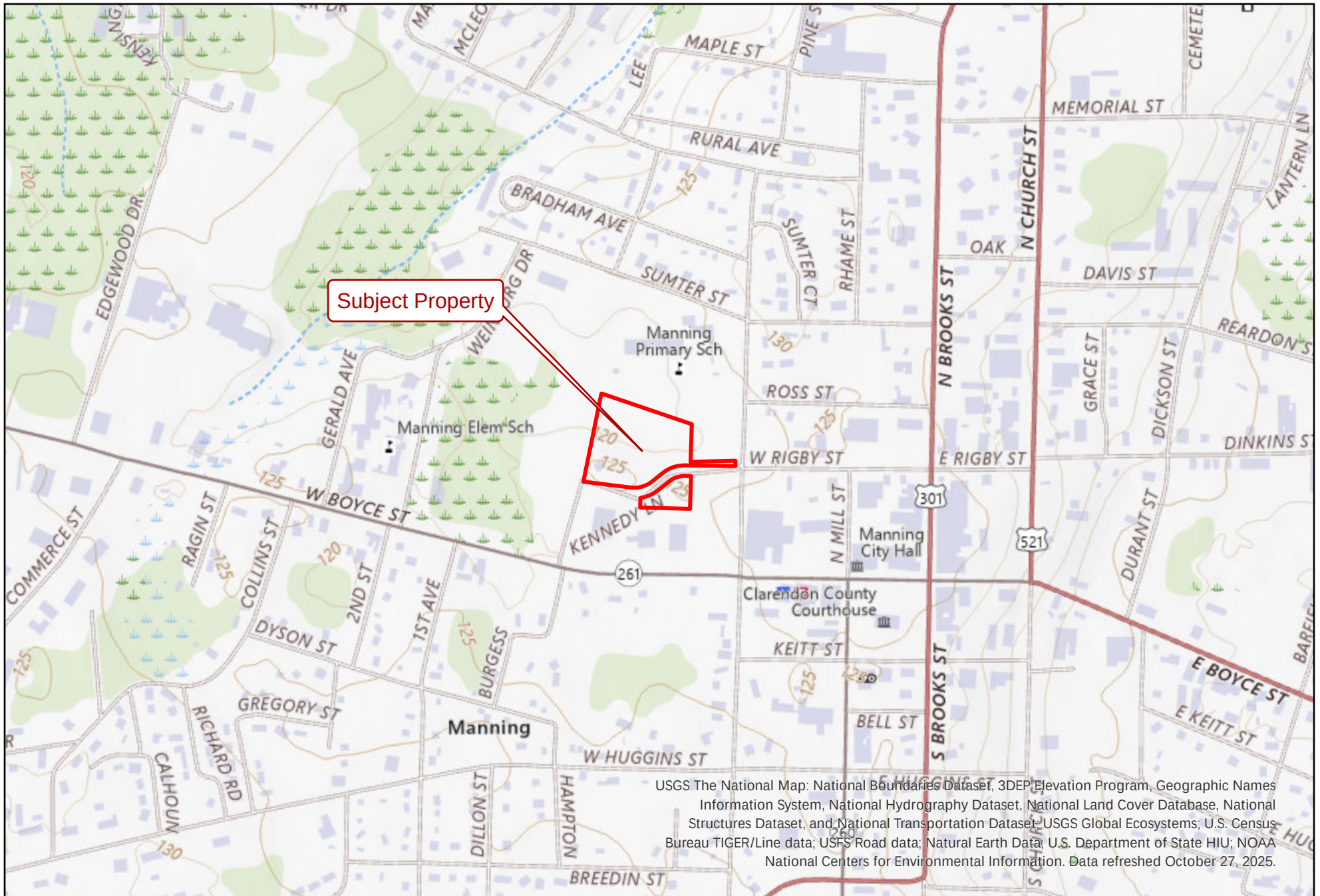
Attachments:

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
Rainfall Worksheet
Exhibit W
Qualifications



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community

 UNITED CONSULTING		Figure Scale  1 inch : 600 ft.	Prepared By: JRF	Figure Title: Site Location Plan	FIG. 1
			Reviewed By: DPH	Project Name: Peaks of Manning II	
			Creation Date: Mar 23, 2026	Project No.: RESHG-26-SC-10302-01	
			Review Date: Apr 6, 2026	Client: Resource Housing Group, Inc.	

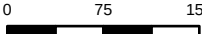


 UNITED CONSULTING	  1 inch : 600 ft.	Prepared By: JRF	Figure Title: USGS Topographic Map	FIG. 2
		Reviewed By: DPH	Project Name: Peaks of Manning II	
		Creation Date: Mar 23, 2026	Project No.: RESHG-26-SC-10302-01	
		Review Date: Apr 6, 2026	Client: Resource Housing Group, Inc.	



Legend

- Subject Property
- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

 UNITED CONSULTING		Figure Scale  1 inch : 150 ft.	Prepared By: JRF	Figure Title: National Wetlands Inventory Map	FIG. 3
			Reviewed By: DPH	Project Name: Peaks of Manning II	
			Creation Date: Mar 23, 2026	Project No.: RESHG-26-SC-10302-01	
			Review Date: Apr 6, 2026	Client: Resource Housing Group, Inc.	





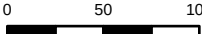
 UNITED CONSULTING		Figure Scale  1 inch : 100 ft.	Prepared By: JRF	Figure Title: Preliminary Aquatic Features Map	FIG. 5
			Reviewed By: DPH	Project Name: Peaks of Manning II	
			Creation Date: Apr 03, 2026	Project No.: RESHG-26-SC-10302-01	
			Review Date: Apr 6, 2026	Client: Resource Housing Group, Inc.	



Photo: Typical view of the Subject Property.



Photo: View of the start of the wetland on the eastern portion of the Subject Property.



Photo: Example of a culvert discharging into the wetland.



Photo: View of the wetland along the northern boundary of the Subject Property.



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625 HOLCOMB BRIDGE ROAD
NORCROSS, GEORGIA 30071
770-209-0029 FAX: 770-582-2900
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Property:	Peaks of Manning II
Location:	Kennedy Lane
Client:	Resource Housing Group, Inc.
Project Number:	RESHG-26-SC-10302-01

**Site
Photographs**



Photo: View of the wetland along the northern boundary of the Subject Property.



Photo: View of the wetland along the northern boundary of the Subject Property.



Photo: View of hydric soil within the wetland feature.



Photo: Example of surface water within the wetland feature.



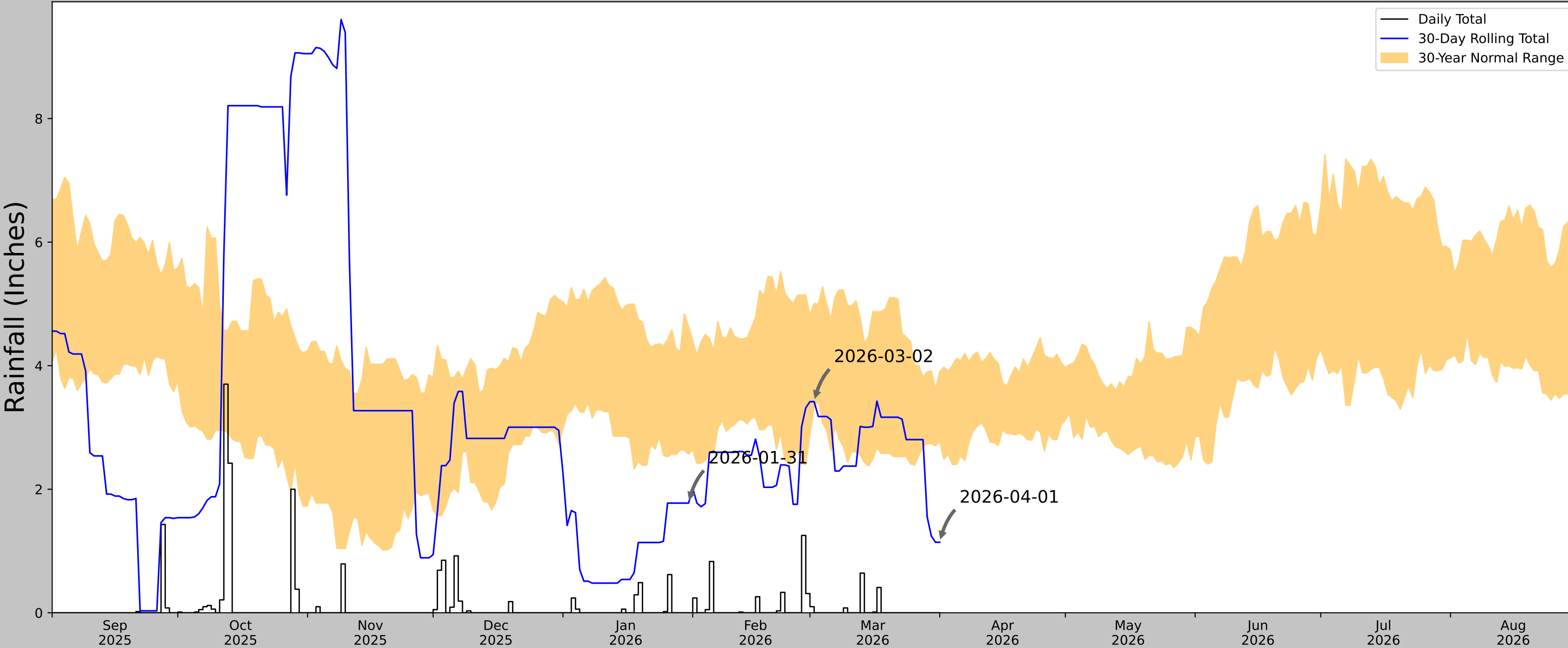
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**Site
Photographs**

Antecedent Precipitation vs Normal Range based on NOAA's Daily Global Historical Climatology Network



Coordinates	33.69689, -80.21504
Observation Date	2026-04-01
Elevation (ft)	118.74
Drought Index (PDSI)	Not available (2026-03)
WebWIMP H ₂ O Balance	Wet Season

30 Days Ending	30 th %ile (in)	70 th %ile (in)	Observed (in)	Wetness Condition	Condition Value	Month Weight	Product
2026-04-01	2.776772	3.901181	1.141732	Dry	1	3	3
2026-03-02	3.343701	5.008662	3.417323	Normal	2	2	4
2026-01-31	2.567323	4.635827	1.775591	Dry	1	1	1
Result							Drier than Normal - 8



US Army Corps
of Engineers.



Figures and tables made by the
Antecedent Precipitation Tool
Version 3.0

Developed by:
U.S. Army Corps of Engineers and
U.S. Army Engineer Research and
Development Center

Weather Station Name	Coordinates	Elevation (ft)	Distance (mi)	Elevation Δ	Weighted Δ	Days Normal	Days Antecedent
MANNING	33.6989, -80.1992	84.974	0.921	33.766	0.446	10849	90
MANNING 1.9 SSE	33.6698, -80.1995	123.031	2.011	38.057	0.981	118	0
MANNING 3.3 WNW	33.7125, -80.2683	140.092	4.081	55.118	2.061	5	0
MANNING 9.4 E	33.7043, -80.0533	76.115	8.395	8.859	3.852	2	0
MANNING 8.2 S	33.5744, -80.2205	76.115	8.689	8.859	3.987	12	0
SUMMERTON 8.4 SE	33.5275, -80.2372	77.1	12.043	7.874	5.514	69	0
GREELEYVILLE 5 N	33.6464, -79.9906	82.021	12.531	2.953	5.676	26	0
KINGSTREE 9.5 NW	33.7456, -79.9629	70.866	13.958	14.108	6.478	1	0
KINGSTREE 7.9 NW	33.7394, -79.9332	70.866	15.541	14.108	7.213	5	0
RIMINI 2 SSW	33.6494, -80.5147	80.052	18.461	4.922	8.398	262	0
CADES 4 W	33.8083, -79.8567	80.052	21.077	4.922	9.588	4	0

EXHIBIT W

Identification of Wetlands

Development: Peaks of Manning II

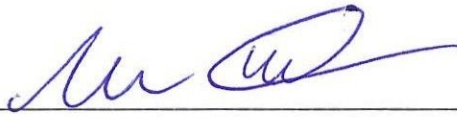
Development Location: Kennedy Lane, Manning

County: Clarendon Acres: 4.23

 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 0.04 (acres) in size.

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



Signature and Certification of Development Owner

Peaks of Manning II Developer, LLC

Name of Developer

4/16/2026

Date

MICHAEL G. ABERNATHY**Summary**

Mr. Abernathy's work experience includes watershed assessments, ecological evaluations, wetland and stream delineations, sediment surveys, and water quality analysis. He has experience in water quality testing and measurement of physical attributes of streams. Mr. Abernathy has assisted in, or personally conducted over 100 wetland and stream delineation projects, and prepared permit applications for U.S. Army Corps of Engineers and Georgia Environmental Protection Division approval. Many of these projects also included determining stream classifications based upon the North Carolina *Methodology for Identification of Intermittent and Perennial Streams and Their Origins* manual. Mr. Abernathy has conducted multiple pond and lake sediment evaluations. He has conducted numerous stream quality assessments, with an emphasis on fish and macro-invertebrate sampling.

Project Experience

WATERSHED ASSESSMENTS - LAFAYETTE, GEORGIA. Mr. Abernathy conducted watershed assessments on sample stretches of streams within and near the city of LaFayette Georgia. The work included measuring chemical parameters utilizing multi-probe, count titration, and color wheel methodology. The streams were also scored using the North Carolina Stream classification manual. Mr. Abernathy also conducted pebble counts, stream velocity measurements, habitat assessments, and riffle and pool counts and measurements. Macroinvertebrate collection was conducted utilizing kick-nets and followed the Georgia DNR Standard operating Procedures. Fish collection was conducted using backpack electro-shocking equipment and seines. Mr. Abernathy utilized the collected specimens to calculate metrics which correspond to stream quality scores. These

metrics included the Index of Biotic integrity (IBI), Index of Well Being (IWB), and other various metrics that provide insight into relative Stream health. Mr. Abernathy performed similar assessments in **Georgetown, Georgia** and **Carnesville Georgia**.

ARC WAY MITIGATION BANK – GWINNETT COUNTY, GEORGIA. Mr. Abernathy conducted macroinvertebrate and fish sampling within an area of impaired streams and wetlands. Sampling was conducted utilizing the Georgia DNR Standard operating Procedures. Collected biological data was utilized to calculate IBI and IWB scores. Additional tasks included delineation of aquatic resources and other visual evaluations of aquatic features. Data was utilized to assist in preparation of the proposed mitigation bank application documents.

FULTON COUNTY SCHOOLS LEARNING CENTER – SANDY SPRINGS, GEORGIA. Mr. Abernathy delineated and flagged a stream flowing through this previously developed property. In addition, Mr. Abernathy took cross sectional and lateral stream measurements for permit application purposes. As part of the work conducted on the property, the stream was also classified using the North Carolina methodology. Mr. Abernathy assisted with preparation of the permit documents for obtaining USACE and EPD approvals for impacts to the stream and stream buffer.

Location	
Norcross, Georgia	
Primary Focus	
Watershed Assessments Stream Bio-assessments Ecological Evaluations Environmental Assessments Wetland/Stream Delineations Sediment Surveys	
Years of Experience	
Firm - 13	Total - 14
Education	
BS Forest Resources University of Georgia 2006	
Licenses	
40 hour Basic Wetland Delineation course Georgia DOT eLearning Course "Environmental Procedures Manual-Ecology."	

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MICHAEL ABERNATHY CONTINUED

COMMERCIAL DEVELOPMENT – ATHENS, GEORGIA. Mr. Abernathy conducted a field delineation for a stream located on a property in Athens, Georgia which was proposed to be purchased for the use of a commercial development. Mr. Abernathy flagged and then used GPS technology to record the boundaries of the stream on the property. Mr. Abernathy also met with the county to receive confirmation of their agreement of the start of the stream for buffer requirements. Mr. Abernathy scored the stream using the North Carolina methodology in order to classify the stream system. Mr. Abernathy also prepared the pre-construction notification documents for submission to the Army Corp of Engineers and buffer variance documents for the State of Georgia, Environmental Protection Division. Approval from both the USACE and the EPD was obtained.

WOODBURY PRESERVE DOWNSTREAM LAKE – FORSYTH COUNTY, GEORGIA. Mr. Abernathy completed a pond sediment evaluation on a pond located in Forsyth County, Georgia. The pond was located downstream of a construction project, and residence neighboring the pond were concerned with runoff from this development. Mr. Abernathy laid out transects across the pond shores, then took measurements of soft sediment and collected sediment cores along the transects.

THE LAKES AT CEDAR GROVE- FULTON COUNTY, GEORGIA. Mr. Abernathy conducted a lake evaluation for an approximate 35.6-acre impoundment located within a residential community consisting of single-family homes in Fulton County, Georgia. This evaluation consisted of a historical aerial review of the watershed of the impoundment. Collecting soft sediment depths along transects across the site and collecting sediment cores within the impoundment. Water quality parameters were also collected which included; pH, temperature, dissolved oxygen, biological oxygen demand, fecal coliform, total phosphorus, nitrite-nitrate, and turbidity. Mr. Abernathy also visually examined the area downstream of the pond to look for evidence of sediment loads within the creek.

SOUTH BERKELEY LAKE SEWER PROJECT – BERKELEY LAKE, GEORGIA. Mr. Abernathy collected sediment data within a pond located downstream of a sewer project. Mr. Abernathy also assisted with the collection of in stream data. This data was collected with the use of automatic water quality monitors equipped with data collectors and telemetry systems. Equipment was placed within streams in the area of the sewer improvements, upstream of the pond.

OVERTON PARK SITE – COBB COUNTY, GEORGIA. Mr. Abernathy conducted a wetland and stream delineation on the property. This included: research available soil surveys and wetland inventory maps; an on-site routine wetlands delineation using guidelines set forth in the USACE 1987 Wetland Delineation Manual and 2012 Piedmont Regional Supplement; and locating and flagging the wetland-upland boundary for the extent of the project site. The delineation identified jurisdictional waters on the property and the limits were located using GPS equipment.

EAST HIGHLANDS – GWINNETT COUNTY, GEORGIA. Mr. Abernathy conducted a wetland delineation of an approximate 45-acre tract in Lilburn, Gwinnett County Georgia. This including flagging and recording GPS points for the streams, wetlands and pond located on the site. Mr. Abernathy also prepared preconstruction notification and jurisdictional request documents for submittal to the Army Corp of Engineers. At the beginning of grading activities for the development, Mr. Abernathy conducted a visual assessment of the streams flowing from the site to look for evidence of recent sediment discharge into the streams. Mr. Abernathy then conducted a sediment survey within an impoundment downstream of the development. This assessment consisted of establishing transects across the inlet of the pond and taking measurements of the water depth and sediment thickness. Core samples were also collected from the pond to look for evidence recent sediment deposition.