



**DEPARTMENT OF THE ARMY
SAVANNAH DISTRICT, CORPS OF ENGINEERS
1590 ADAMSON PARKWAY, SUITE 200
MORROW, GEORGIA 30260**

12 JAN 2017

Regulatory Division
SAS-2016-00641

**JOINT PUBLIC NOTICE
Savannah District/State of Georgia**

The Savannah District has received an application for a Department of the Army Permit, pursuant to Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. § 403) and Section 404 of the Clean Water Act (33 U.S.C. § 1344), as follows:

Application Number: SAS-2016-00641

Applicant: Chris Seward
DCT Industrial Trust, Inc.
3340 Peachtree Road Northeast
Atlanta, Georgia 30326

Agent: Contour Environmental, LLC
4462 Bretton Court Northwest, Suite 14
Acworth, Georgia 30101

Location of Proposed Work: The project site is located on a 57-acre multi-parcel site west of Thorton Road, east of Factory Shoals Road, and north of Douglas Hill Road, Austell, Douglas County, Georgia (Latitude 33.7590, Longitude -84.5988).

Description of Work Subject to the Jurisdiction of the U.S. Army Corps of Engineers:
The work involves the construction of a 925,800 square foot modern logistics warehouse, parking areas, travel lanes, access road into the property, off-line stormwater management, and associated infrastructure. The permanent loss of 1,050 linear feet of perennial stream channel, 97 linear feet of ephemeral channel, and 0.823 acre of forested wetland will occur if the project is constructed as proposed. The applicant has proposed compensatory mitigation using the Savannah District credit calculation worksheet and is proposing to purchase 5,670 stream credits and 6.76 wetland credits from an approved bank within the Middle Chattahoochee primary service area. This Joint Public Notice announces a request for authorizations from both the U.S. Army Corps of Engineers and the State of Georgia. The applicant's proposed work may also require local governmental approval.

STATE OF GEORGIA

Water Quality Certification: The Georgia Department of Natural Resources, Environmental Protection Division, intends to certify this project at the end of 30 days in accordance with the provisions of Section 401 of the Clean Water Act, which is required for a Federal Permit to conduct activity in, on, or adjacent to the waters of the State of Georgia. Copies of the application and supporting documents relative to a specific application will be available for review and copying at the office of the Georgia Department of Natural Resources, Environmental Protection Division, Watershed Protection Branch, 2 MLK Jr. Drive, Suite 418, Atlanta, Georgia 30334, during regular office hours. A copier machine is available for public use at a charge of 10 cents per page. All coastal projects are filed at our Brunswick office and will need to be requested from Mr. Bradley Smith at Bradley.Smith@dnr.ga.gov. Any person who desires to comment, object, or request a public hearing relative to State Water Quality Certification must do so within 30 days of the State's receipt of application in writing and state the reasons or basis of objections or request for a hearing. The application can be reviewed in the Savannah District, U.S. Army Corps of Engineers, Regulatory Division, 1590 Adamson Parkway, Suite 200 Morrow, Georgia 30260.

State-owned Property and Resources: The applicant may also require assent from the State of Georgia, which may be in the form of a license, easement, lease, permit or other appropriate instrument.

U.S. ARMY CORPS OF ENGINEERS

The Savannah District must consider the purpose and the impacts of the applicant's proposed work, prior to a decision on issuance of a Department of the Army Permit.

Cultural Resources Assessment: A Phase I cultural resources survey was conducted and coordination with the State Historic Preservation Office is ongoing. No previously recorded sites were identified within the project area, however, one previously undocumented archeological site and three historic buildings were identified within the project area. Additionally, seven historic buildings were identified within the viewshed of the undertaking.

Endangered Species: Pursuant to Section 7(c) of the Endangered Species Act of 1973, as amended (16 U.S.C. § 1531 et seq.), we request information from the U.S. Department of the Interior, Fish and Wildlife Service, the U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service; or, any other interested party, on whether any species listed or proposed for listing may be present in the area. Coordination with the US FWS has been initiated for potential effects to listed species.

Public Interest Review: The decision whether to issue a permit will be based on an evaluation of the probable impact including cumulative impacts of the proposed activity on the public interest. That decision will reflect the national concern for both protection and utilization of important resources. The benefit, which reasonably may be expected to accrue from the proposal, must be balanced against its reasonably foreseeable detriments. All factors, which may be relevant to the proposal will be considered including the cumulative effects thereof; among those are conservation, economics, aesthetics, general environmental concerns, wetlands, historic properties, fish and wildlife values, flood hazards, flood plain values, land use, navigation, shoreline erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, considerations of property ownership and in general, the needs and welfare of the people.

Consideration of Public Comments: The U.S. Army Corps of Engineers is soliciting comments from the public; federal, state, and local agencies and officials; Native American Tribes; and other interested parties in order to consider and evaluate the impacts of this proposed activity. Any comments received will be considered by the U.S. Army Corps of Engineers to determine whether to issue, modify, condition or deny a permit for this proposal. To make this decision, comments are used to assess impacts on endangered species, historic properties, water quality, general environmental effects, and the other public interest factors listed above. Comments are used in the preparation of an Environmental Assessment and/or an Environmental Impact Statement pursuant to the National Environmental Policy Act. Comments are also used to determine the need for a public hearing and to determine the overall public interest of the proposed activity.

Application of Section 404(b)(1) Guidelines: The proposed activity involves the discharge of dredged or fill material into the waters of the United States. The Savannah District's evaluation of the impact of the activity on the public interest will include application of the guidelines promulgated by the Administrator, Environmental Protection Agency, under the authority of Section 404(b) of the Clean Water Act.

Public Hearing: Any person may request, in writing, within the comment period specified in this notice, that a public hearing be held to consider this application for a Department of the Army permit. Requests for public hearings shall state, with particularity, the reasons for requesting a public hearing. The decision whether to hold a public hearing is at the discretion of the District Engineer, or his designated appointee, based on the need for additional substantial information necessary in evaluating the proposed project.

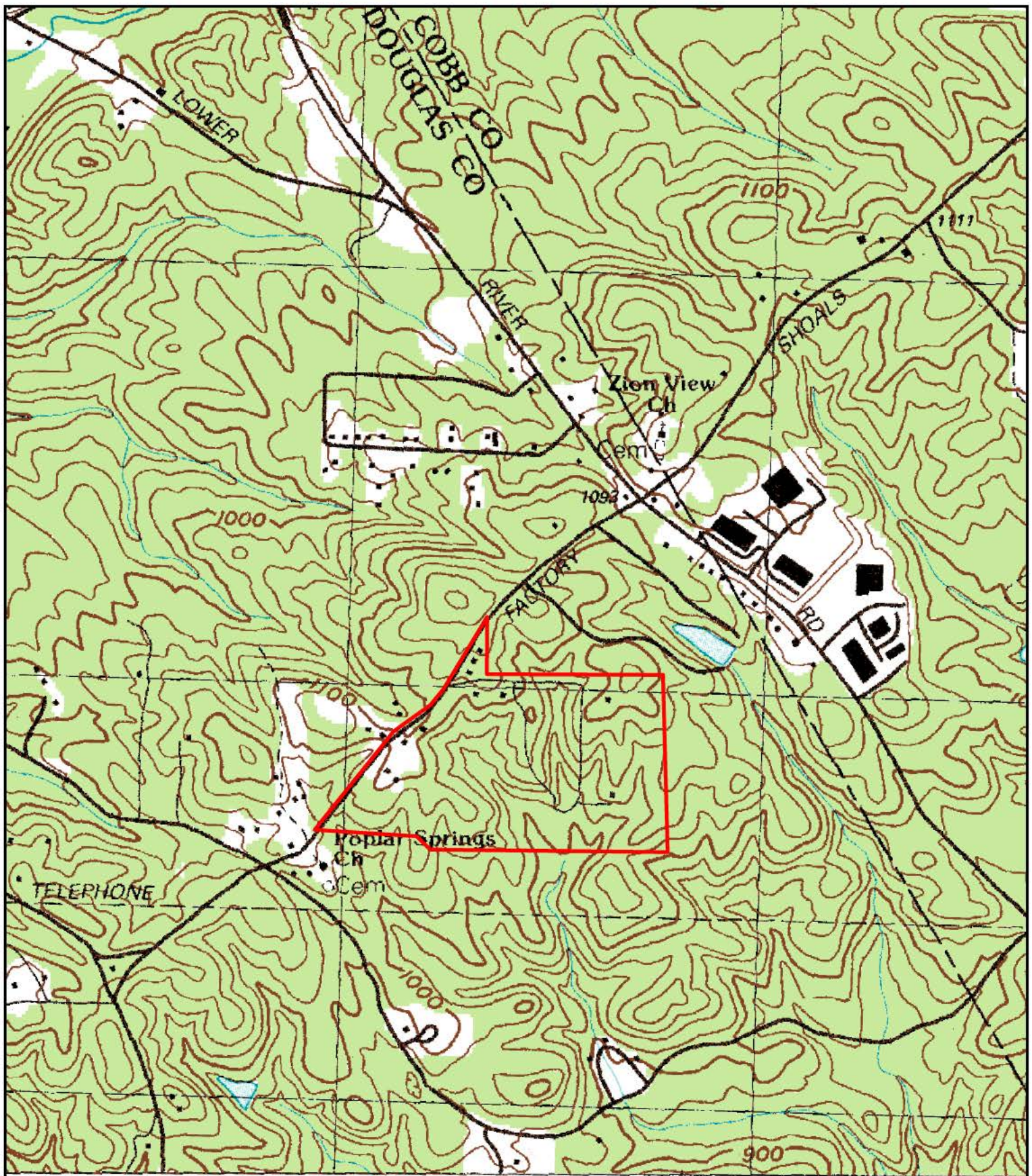
Comment Period: Anyone wishing to comment on this application for a Department of the Army Permit should submit comments in writing to the Commander, U.S. Army Corps of Engineers, Savannah District, Attention: Holly Ross, Project Manager Piedmont Branch, 1590 Adamson Parkway, Suite 200

Morrow, Georgia 30260, or via email to holly.a.ross@usace.army.mil no later than 30 days from the date of this notice. Please refer to the applicant's name and the application number in your comments.

If you have any further questions concerning this matter, please contact Holly Ross Project Manager, Piedmont Branch, at (678) 422-2727 or holly.a.ross@usace.army.mil.

****Enclosures**

1. Project Location Map
2. Delineation of Waters
3. NWI Map
4. Soils Map
5. Project Description (6 pages)
6. Off-Site Alternatives



Produced By:



Contour Environmental LLC
4462 Bretton Court NW, Suite 14
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**FIGURE 1: VICINTY MAP
USGS TOPOGRAPHIC MAP**

Factory Shoals Road Site
Lithia Springs, Douglas County, GA
For
DCT Industrial Trust, Inc.
SAS-2016-00641
November 30, 2016

LEGEND

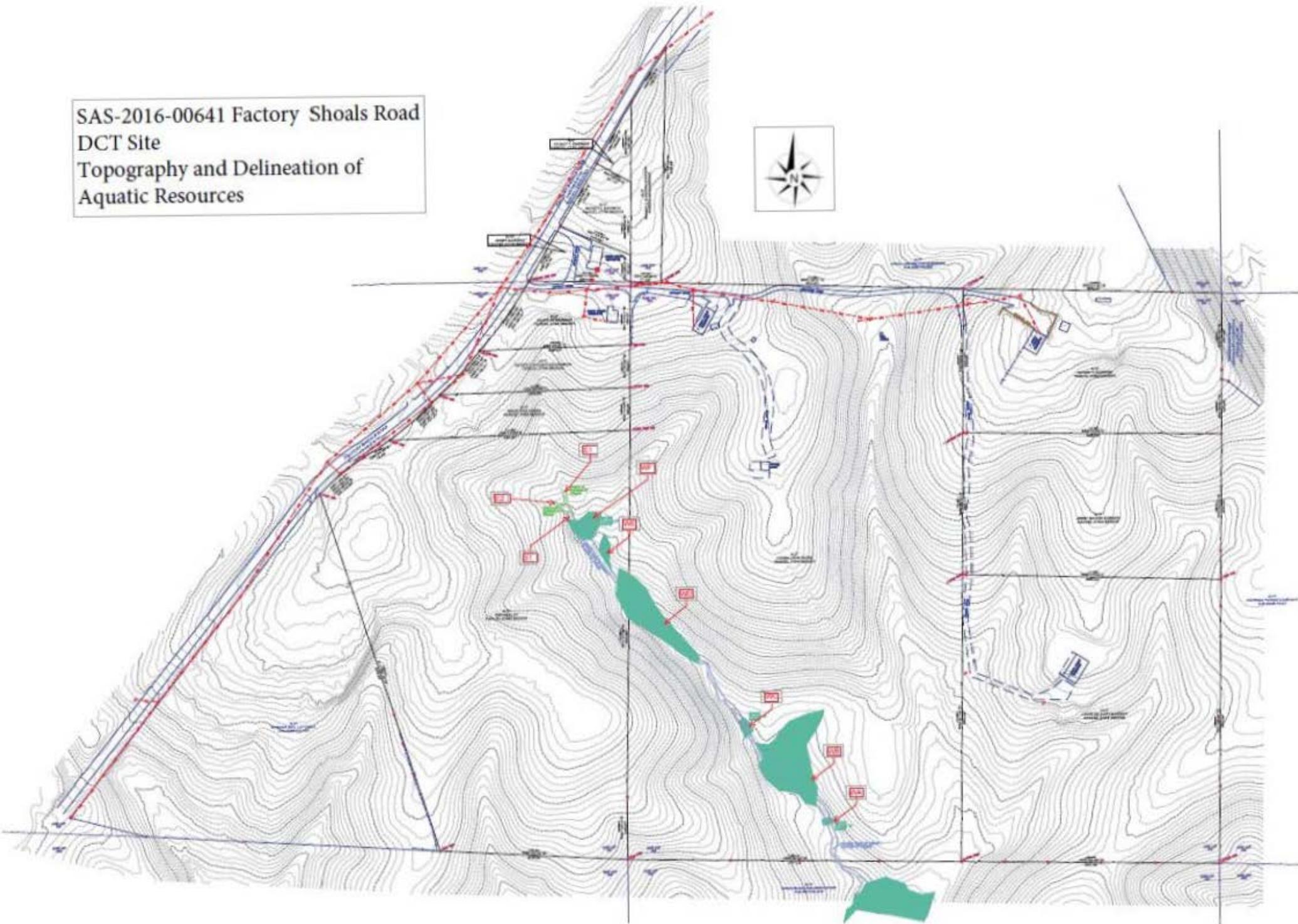
Approximate Property Boundary

1,000

Feet



SAS-2016-00641 Factory Shoals Road
DCT Site
Topography and Delineation of
Aquatic Resources





U.S. Fish and Wildlife Service

National Wetlands Inventory

NWI

Jun 3, 2016



Wetlands

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

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

User Remarks:

Soil Map—Douglas County, Georgia



Map Scale: 1:4,750 if printed on A landscape (11" x 8.5") sheet.

0 50 100 200 300 Meters

0 200 400 800 1200 Feet

Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 16N WGS84



**Natural Resources
Conservation Service**

Web Soil Survey
National Cooperative Soil Survey

6/3/2016
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I. INTRODUCTION

The proposed project property is located on an approximately ±57 acre multi-parcel assemblage of land located west of Thornton Road, East of Factory Shoals Road, and north of Douglas Hill Road in Austell, Douglas County, Georgia (refer to Figure 1 and Figure 2). More specifically, the site property is located within Land Lots 772, 794, and 795 of the 18th land district, City of Lithia Springs, Douglas County, Georgia, and is identified as Tax Parcel Nos. 07721820003, 07951820001, 07941820001, 07941820002 and 07941820004. The property is centered at latitude 33.758926 and longitude -84.598765. The nearest named waterbody is the Chattahoochee River located south of the site property. The property is within the Middle Chattahoochee - Lake Harding Watershed, Hydrologic Unit Code (HUC) 03130002. A Site Location Map is depicted on the USGS topographic quadrangle for “Mabelton SW”, Georgia (refer to Figure 1).

A total of Six [6] wetlands, two [2] ephemeral channels, and one [1] stream channel were identified within the impact areas of the proposed project property (refer to Figure 7: Preferred Site Plan Layout Map). Site limitations, grading limitations, economics, and engineering constraints, as discussed in the Alternatives, Avoidance, and Minimization sections of this document, require the warehouse development to occur within the ±57 acre property. After careful consideration of off-site alternatives, on-site alternative layout plans, and minimizing the proposed site plan design, the resulting project build of 925,800 square foot “modern logistics” commercial warehouse and associated infrastructure will require unavoidable permanent impacts to jurisdictional *waters of the U.S.* including; 1,050 linear feet of perennial stream, 97 linear feet of ephemeral channel, and 0.823 acre of forested wetland. The applicant has made a conscious effort to modify the design of the warehouse development multiple times (both layouts and dimensions) such that the impacts to jurisdictional waters and wetlands incurred have been minimized to the greatest extent practicable.

We are submitting the following and enclosed application materials in support of the requested Individual Section 404 Permit for the proposed project.

II. EXISTING SITE CONDITIONS

As stated above, the project property is located within the 18th land district and is identified as Parcel No's.: 07721820003, 07951820001, 07941820001, 07941820002, and 07941820004 within Land Lots 772, 794, and 795 in Douglas County, Georgia. More specifically, the property is located at latitude 33.758926 and longitude -84.598765, within Georgia Hydrologic Unit Code (HUC) 03130002, which is located within the Middle Chattahoochee River Basin. The site property is presently developed with five [5] residential dwellings along Factory Shoals Road; however, the majority of the site property is heavily wooded containing a diversity of hardwood and softwood tree species, and a moderate amount of vegetative undergrowth.



Jurisdictional Wetland/Waters identified specifically on the proposed site property are discussed below and have been included on Aerial Existing Condition Map (refer to Figure 3) and on Topographical Survey Map (refer to Figure 4).

Stream 1 (S1): Consists of the bed and bank of a southeasterly-trending stream that starts below Wetland F (described below) at an obvious head-cut as intermittent then forms more perennial morphological characteristics further downstream of Wetland D (also described below). All onsite wetlands (described below) are adjacent to this stream. The streambed can best be described as containing muck, sand, gravel, and cobble sized substrate. The average width of the stream is estimated at 2 to 4 feet.

Wetland A through F (WA, WB, WC, WD, WE, WF): Consists of six (6) forested/fringe wetlands located within the riparian zone of Stream 1 (described above). Soils within these wetlands are hydric (anaerobic) consistent of the loamy gleyed matrix and depleted matrix indicators. Saturation, surface water, and seasonal high water table are notable. Other hydrologic indicators include: watermarks, drainage patterns, water-stained leaves, hydrogen sulfide odor, and thin muck surface. Hydrophytic vegetation was prevalent throughout these wetlands and included: *Acer rubrum* (red maple), *Thelypteris palustris* (eastern marsh fern), *Onoclea sensibilis* (sensitive fern), and *Osmundastrum cinnamomeum* (cinnamon fern).

Ephemeral Streams 1 and 2 (E1 and E2): Consists of the bed and bank of two (2) southerly-trending ephemeral channels located north of Wetland F (described above) and the intermittent portion of Stream 1. These channels appear to displace surface water only after precipitation events and are not influenced by seasonal groundwater fluctuation.

All areas/features described above have a hydrologic surface connection with the Chattahoochee River (located to the southeast of the site property). These features are direct components of the Middle Chattahoochee River Watershed (HUC) 03130002; therefore, consist of *Waters of the U.S.*, and regulated under Section 404 of the Clean Water Act (CWA).

For your reference, a copy of the Jurisdictional Wetlands/Waters Delineation Report is attached as Attachment A.

III. PROJECT DESCRIPTION

The applicant, DCT Industrial Trust, Inc. who is known for their extensive portfolio of high-quality, well-located distribution and industrial buildings to meet the specific needs of their diversified customer base, is proposing the construction of a 925,800 square foot industrial warehouse. The proposed warehouse would be located on ±57 acres located west of Thornton Road; east of Factory Shoals Road, and north of Douglas Hill Road in Austell, Douglas County, Georgia. Associated warehouse access drives and parking areas would be connected to Factory Shoals Road by construction of a new access drive north of the proposed warehouse and parking areas. Two [2] proposed stormwater



facilities would be constructed off-line within the southeastern and southwestern corners of the project property.

In order for this to be a viable development, adverse impacts due to site grading and site fill, of **1,050 linear feet** of perennial stream channel, **97 linear feet** of ephemeral channel, and **0.823 acre** of forested wetland is anticipated to occur near the western portion of the project property.

The majority of grading and excavation for the proposed project, within the approximately 57 acre site, are located within non-jurisdictional upland areas. However, avoidance of all of natural resources within the project area is not practicable due to topographic relief, size of the site, and required layout to allow for a viable development. Thus, excavation, fill, and grading associated with the proposed industrial warehouse development would alter/impact the following natural resources (as described above):

- **Ephemeral Channel 1:** Fill of 54 linear feet or 349 square feet (0.008 acre) necessary for structural fill for the warehouse foundation;
- **Ephemeral Channel 2:** Fill of 43 linear feet or 297 square feet (0.007 acre) of necessary for structural fill for the warehouse foundation;
- **Stream 1:** Fill/pipe of 1,050 linear feet necessary for structural fill for the warehouse foundation, parking foundation, and slope stabilization;
- **Wetland B:** Fill of 0.422 acre necessary for structural fill for warehouse foundation;
- **Wetland C:** Fill of 0.018 acre necessary for structural fill for warehouse foundation;
- **Wetland D:** Fill of 0.286 acre necessary for structural fill for warehouse foundation;
- **Wetland E:** Fill of 0.027 acre necessary for structural fill for warehouse foundation;
- **Wetland F:** Fill of 0.07 acre necessary for structural fill for warehouse foundation.

IV. PROJECT NEED AND PURPOSE

A. Background

The following background describes the need for the preferred project and leads up to the applicants project purpose found at the end of this section.

Warehouse buildings are requested by potential applicant clients for specific areas. The first criteria is determine, which area would be the most desired for tenants (geographic location). Occupants of industrial/distribution buildings can generally be broken down into



two very broad categories. First are those looking for “shade and shelter.” Even though the “shade and shelter” occupiers have specific size and location requirements, the overriding objective is low cost of occupancy. The “shade and shelter” occupiers aren’t as concerned with the logistics of imports and distribution or speed of delivery to their end customers. The “shade and shelter” group typically operate businesses whose customers are also very price sensitive and not as sensitive to delivery times of the needed products. The second category of occupiers are those that are interested in locating in “Modern Logistics” warehouse/distribution buildings. Of the 14.7 billion square feet of total industrial space in the U.S., according to CoStar and CBRE-EA’s data bases only 1.8 billion square feet or 13% are considered “Modern Logistics” facilities. “Modern Logistics” warehouse/distribution buildings typically require the following factors and are located in the following areas:

- Constructed after 1995 or newer;
- Located in one of the five U.S. regional markets with excellent logistics infrastructure. Those markets are Atlanta, Chicago, Dallas/Fort Worth, California/Inland Empire, and New Jersey. Also, other smaller markets on a case-by-case basis, for example, Memphis, Tennessee;
- Logistics infrastructure in these markets consists of more than one interstate, more than one Class-A rail line, major growing population base, access to 25% of the U.S. population within a one truck day drive and an international airport. In other words, an occupier can receive and ship their products in a very efficient manor by truck, rail, air, and in most cases ship.
- “Modern Logistics” buildings typically have the following traits:
 - Located within 1.5 miles of a major interstate;
 - Located within 5 miles of a rail intermodal facility;
 - Have access to public water, sewer, and electrical power;
 - Can accommodate car and truck parking requirements that are typically more than double that provided by buildings built prior to 1995. For example, a building of 1,00,000 SF would need to have 400 car spaces for employees and 200 trailer parking in addition to the building’s dock doors.
 - Located within reasonable proximity to major package and shipping hub services like FedEx or UPS.

In the case of this proposed project for a building of 925,800 SF, this size building will be considered a “Modern Logistics” bulk building. According to CBRE-EA and other brokerage groups these distribution centers are typically taller (35 feet to 40 feet clear



height) and deeper (exceeding 550 to 600 feet). Project site design is important because these larger facilities often require cross-docked design, with receiving docks on one side and shipping docks on the other, and trailer parking yards that can accommodate 250 or more parking stalls and expansion capability, all of which hurt lot coverage (building square footage per acre) and mandate larger sites. Leadership in Energy and Environmental Design (LEED) certification is also very common for these type facilities. Some of these facilities are owner occupied, some are leased as credit tenant leases and many are traditional triple-net operating leases.

The first companies to use bulk distribution centers in multiple markets were big retailers with \$50 billion or more in revenue and forward-looking logistics and supply chain leadership companies. Wal-Mart, Target, and The Home Depot topped the list, and others including Ross Stores, Pier 1, and Office Depot followed. These buildings tend to be concentrated in core distribution markets such as Atlanta, GA and Dallas, TX and port and inland-port markets such as Los Angeles, CA and Memphis, TN.

For direct to consumer (DTC) companies such as Amazon.com, bulk distribution centers with proximity to one or more overnight shipping services provide efficiencies in very large buildings. Cincinnati, for instance, is a well-established DTC hub with numerous bulk facilities because companies can use the UPS service in Louisville, the FedEx hub in Indianapolis or DHL service at Cincinnati/Northern Kentucky International Airport.

After shifting some or all of their manufacturing overseas, consumer and industrial product manufacturers such as Whirlpool and Newell-Rubbermaid have optimized their supply chains by leasing bulk distribution centers. With proximity to ports and intermodal rail service being a key site consideration, many were build-to-suit projects, although speculative buildings met the need in several markets.

As you walk through your local grocery store, and the companies you recognize probably occupy space in multiple bulk distribution centers: Colgate-Palmolive, Kraft, Kimberly Clark, Post Cereals, General Mills, Proctor & Gamble, and Unilever. All these companies have consolidated into bulk distribution centers with advanced warehouse, labor and transportation management technology to take costs out of their worldwide supply chains. Bulk facilities are often attractive to occupiers because of the potential to grow earnings by reducing supply chain costs.



B. Why Atlanta, GA

The occupier of a “Modern Logistics” bulk building of 750,000 SF or larger will typically consider the major regional U.S. markets of Atlanta, Chicago, Dallas/Fort Worth, California/Inland Empire, and New Jersey. Depending on the occupier’s business size and needs, they may located in more than one of the major regional markets. Their determination of which markets to locate a facility is typically a product of a logistics study. The logistics study will consider the following factors:

- Transportation cost of inbound product to the customer;
- Transportation cost of outbound product to the customer;
- Time required for product to arrive at the facility and for that product to be transported to the customer from the facility;
- Labor cost and quality personnel to staff the facility.

Once a regional U.S. market is chosen by the building occupier, the occupier will determine which area or submarket within the metro area to concentrate their building search.





Produced By:



Contour Environmental, LLC
4462 Breton Court NW
Acworth, GA 30101

Aerial Alternative Analysis Location Map

Factory Shoals Road IP
Austell, Douglas County, GA
for
DCT Industrial Trust, Inc
USACE File: SAS-2016-00641

1.5
Miles

