

U.S. Department of Transportation Federal Transit Administration

Finding of No Significant Impact

Project: Five Points Station Transformation
Applicant: Metropolitan Atlanta Rapid Transit Authority (MARTA)
Project Location: Atlanta, Fulton County, Georgia

I. Introduction

The Federal Transit Administration (FTA) has determined, in accordance with 23 Code of Federal Regulation (CFR) Section 771.121, that the Five Points Transformation Project (herein referred to as “the Project”), will result in no significant impact on the environment. MARTA proposes to construct the Project in part using grant funding managed through FTA.

This Finding of No Significant Impact (FONSI) is based on the Project’s Environmental Assessment, dated November 2023 (the EA), and incorporated by reference. The EA was prepared in compliance with the National Environmental Policy Act of 1969 as amended (NEPA) (42 United States Code (U.S.C.) §4321 et. Seq.) and FTA’s implementing regulations (23 CFR Part 771). The EA was also prepared in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended; Section 4(f) of the U.S. Department of Transportation Act of 1966, as amended (49 U.S.C. §303 and 23 U.S.C. §138), its implementing regulations (23 CFR Part 774); and other applicable federal statutes, rules and regulations.

The EA and appendices have been independently evaluated by FTA and have been determined to accurately discuss the Project’s purpose, need, environmental impacts of the Project, and appropriate mitigation measures.

II. Project Description

The Five Points Transformation Project will demolish the existing station canopy, construct a new canopy, and demolish and redesign the plaza area entirely within the same geographic footprint of the existing plaza. The Project will improve and modernize the station by opening the plaza slab beneath a new, larger canopy designed to avoid pooling of water and the resulting leaking experienced today, and to maximize access to daylight and air at the plaza and concourse levels. The new design will emphasize visual and physical connections to create a safe, efficient, and spatially captivating station experience. Strengthening the east-west flow of the newly exposed concourse level between the Forsyth and Peachtree entrances provides direct sightlines to fare control, while adjacent walls can be transformed to retail frontages and murals to add activity and color to the station concourse.

The plaza level emphasizes north-south pedestrian connections at Broad Street via two lightweight bridges. The redesign would demolish the existing concrete canopy and replace it with an arched timber roof canopy with solid or glass panels, and deep overhangs. The timber components are completely covered by the panels for weather protection and at the canopy edges, protective caps will be used to

shield the timber ends. The design for the timber beams is a “dry service use” which means it is not directly exposed to the weather elements, and the timber material will be resistant to mold, rot and is also insect repellent. The canopy structure will be supported by structural steel V-shaped columns that will rest on existing station columns, minimizing the impact of the canopy supports on the base station structure. The canopy has been designed to prevent water penetration to the concourse below. The arched roof will be constructed of a series of panels connected with standing seams, an industry standard product with overlapping joints to prevent water intrusion. The new canopy has been designed to address the potential intrusion of driving rain with the canopy structure extending beyond the concourse openings along all of the edges. The new canopy will be curved to promote natural water shedding along the north/south eaves of the canopy. A robust gutter system will be installed and will be easily accessible for maintenance. The sloped top cap, below the finished roof and along the length of the timber girders, will prevent any standing water from accumulating along the top face of the timber girder and will guide any potential water infiltration away from the edges. The new design also includes bird protection along the top of the timber girders to prevent birds from nesting along and damaging the timber members.

The concourse level will feature new station vendor areas and public art, while the plaza level will provide spaces for community activities, greenspace, and additional displays of public art. The existing station soccer field will be relocated within the new plaza space. The Project includes a complete repaving and waterproofing replacement to the plaza level and repaving of the concourse level. Both of these efforts will work with the stormwater management trenches to prevent water penetration onto the tracks and platforms below. Additional improvements include construction of bus loading areas designed in a “sawtooth” pattern along Alabama Street SW and Forsyth Street SW. Construction of the sawtooth bus bays will require demolition and redesign of the existing curbs. Neither street will be widened as part of this project and Alabama Street will continue to be bus only access. Bus layover areas will be temporarily relocated during project construction to nearby rail stations including Georgia State, King Memorial and Civic Center.

III. Purpose and Need

Five Points Station is the hub of the MARTA system where buses and rail connect in the heart of downtown Atlanta. The Project is intended to modernize and improve the station to reflect its importance as a downtown transportation hub reflective of a world class city. The Project will address critical infrastructure needs, improve bus and rail connectivity, and enhance site access, safety and the overall customer experience at the station by increasing natural light and air circulation at the station plaza and concourse levels, with the overall goal to create a welcoming and better functioning station. The purpose and associated needs are:

- Enhance Site Access and Safety
 - Address safety concerns including obstructed sightlines and limited visibility
 - Rectify grade changes and improve site mobility
 - Modify access to improve bus to rail connectivity
 - Simplify site wayfinding
- Increase Natural Light and Air Circulation
 - Plaza level restricts natural air circulation and light to platforms

- Existing roof structure obstructs natural light and limits visibility due to darkness
- Create a more inviting and welcoming environment with more public spaces
- Modernize Facility
 - Integrate station with downtown
 - Correct deficiencies of existing canopy design that retains water
 - Update to meet current design standards

IV. Project Alternatives

The EA evaluated the No-Build Alternative and the Build Alternative. Based on the environmental review and public input, FTA has selected the Build Alternative for the Project.

Build Alternative

The Project is within the existing limits of the Five Points Station property. The Build Alternative will renovate and modernize Five Points Station and reconfigure the site for better mobility, operations, maintenance, and safety. The following physical elements are included in the Build Alternative:

1. Reconfigure plaza level to uncover the concourse level to allow better air flow and provide daylight.
2. Construct new access from new plaza bridges to interior of station at the concourse level.
3. Demolish the existing canopy roof structure.
4. Construct new canopy structure to provide an open-air plaza connected to the concourse level.
5. Install sawtooth bus bays along Forsyth Street and Alabama Street by moving the existing curb line into the property for better bus operations.
6. Reprogram plaza area to activate public space.

The Project will be constructed within the existing footprint of the MARTA Five Points Station and does not propose changes to transit operations for bus or rail service.

No Build Alternative

Under the No Build Alternative, MARTA would not renovate the plaza area and roof of Five Points Station. The No Build Alternative would not modify the plaza area of the station and would not change the canopy roof structure of the station. The No Build Alternative is included to compare the relative benefits and impacts of implementing the Project. The No Build Alternative does not meet the Project purpose and need. It would not improve drainage and stormwater management, upgrade to meet current stormwater management requirements as well as structural, wind and seismic loads, enhance safety and site access, or improve natural light and air circulation.

V. Public Outreach and Agency Coordination

Circulation of the EA and Public Comment Period

Notice of Availability for the EA was published in the Atlanta Journal-Constitution, a newspaper serving Atlanta and Fulton County, Georgia, on December 6, 2023. The EA was available for review in the

following locations: 1) Five Points MARTA Station Ride Store; 2) Fulton County Central Library; 3) MARTA Headquarters and 4) online at www.fivepointstranformation.com and linked on www.itsmarta.com. The comment period was open until January 5, 2024.

On December 14, 2023, MARTA held a public open house meeting to present and receive comments on the findings of the EA and mitigation measures. The meeting was held at the Five Points Station at 30 Alabama Street, SW, Atlanta, Georgia from 4:00 p.m. until 7:00 p.m. Approximately 200 people attended the public open house and 44 comment forms were received at the meeting. The public was also invited to comment online, through the MARTA public hotline, by email and mail. Fifty-four (54) were received online specifically in response to the EA. An additional 143 comments were received in general response to the project during the project comment period. Six (6) email comments were received and one (1) comment was received through the hotline. MARTA received three (3) letters with comments from stakeholders, with responses attached and summarized below.

Comments received were generally supportive of the project and the design elements. Themes of comments included the following with the responses:

- **Accessibility/Connectivity** – ensuring that the project improve access, signing and wayfinding and maintain systems to move between levels.
Response: The project purpose and need includes improving site access and making more seamless connections across the site. The need for better access is discussed in Section 1.2.1 Enhance Site Access and Safety in the EA. The alternatives were compared based on their ability to achieve this objective. Additional comment on access preferences and requests for improved site signing and wayfinding have been passed to the design team for inclusion in the final design process.
- **Amenities** – comments were focused on site amenities including restrooms, vendors and retail elements, more seating, covered shelters for buses, and other features for comfort and convenience.
Response: The project will provide additional amenities, such as community garden space, seating, Station Soccer, and more greenspace on site and existing amenities currently offered at the station will continue to be offered at the station. These comments have been shared with the design team to be considered during final design. This is discussed in Section 1.3: Project Description and Section 1.4: Project Alternatives of the EA.
- **Sustainability** – commentors supported sustainable elements of the design and prefer features that require less maintenance and the use of environmentally friendly materials.
Response: Sustainability principles are included in the conceptual design and are included to help manage stormwater with more vegetative areas on the site. Sustainability elements being considered can be found in the Concept Report in Appendix B of the EA.
- **Value** – a few comments questioned the cost of the improvements and would like to see MARTA use the resources for service expansion and other improvements.
Response: Improvements to the Five Points Station have been identified as a long-standing need, and because of the extent of the improvements needed at this station, MARTA is taking

the opportunity to invest in a more comprehensive renovation of the station to provide a long-term benefit rather than a short-term repair. The upfront capital cost provides long term benefits in reduced operations and maintenance costs from the redesign of the station. Maintenance of the existing station is costly and the life span is unknown because of the series of prestressed precast concrete of the existing canopy. For these reasons, the renovation is more cost effective and will provide ease of maintenance in future years as discussed in the EA in Section 14.4.2.2: Repair Existing Canopy and Plaza. The project is included in the More MARTA Atlanta funding and also has been identified as a need as part of the Station Rehabilitation program as discussed in the EA in Section 1.1: Project Background.

- **Safety** – there were many comments on the need for safety improvements and more police presence at the station and on the system.

Response: Safety is the highest priority to MARTA both during construction and after construction for long term safety and security at the station. The removal of obstructed sightlines that limit visibility is an element of the Project intended to address safety concerns associated with the current station design. In addition, MARTA is required to meet safety and security standards and regulations in the FTA’s Public Transportation Agency Safety Plan (49 CFR Part 673) and National Public Transportation Plan. The Contractor is required to follow MARTA’s SAQ-PL-1006: Safety & Security Certification Program Plan for in depth details along with SAQ-FO-5001C: Safety and Security Certification Required Documentation Form. The Site Specific Safety Plan will include at a minimum: Site Security Plan and Site Safety Plan. This plan will include plans for addressing emergency situations and is discussed in Section 11: Safety and Security in the EA. MARTA police will have a station presence during and after construction.

- **Service** – these comments were generally about frequency of service and the need for better integration of service for rail and bus transfers.

Response: The purpose of this project is to renovate the station and does not make changes to service outside of construction. MARTA regularly reviews service plans and makes updates as warranted. These comments on both bus and rail service have been shared with MARTA’s service planning team. Impacts to service as a result of construction are discussed below. Service changes are addressed separately by MARTA and service modifications are not a part of the project as discussed in Section 2: Transportation. Bus and rail riders will benefit from better connectivity with the station redesign with improved access between the two.

- **Development** – these comments focused on higher density development of the site and including transit-oriented development (TOD) and housing on the Five Points Station site.

Response: The current plan does not include housing or transit-oriented development on the station property. MARTA does collaborate with developers, Invest Atlanta, Central Atlanta Progress, and other partners to support transit-oriented development around our rail station sites. This is discussed in the EA in *Section 1: Indirect and Cumulative Impacts*. To partner with developers on MARTA has developed specific policies and guidelines for Transit-Oriented Development that can be found here: <https://itsmarta.com/guidelines-policies.aspx>.

- **Historic Preservation** – these comments were about options to preserve the historic canopy structure.

Response: While the new design concept may not align with everyone's preferences, we continue to engage to understand community desires. As part of the mitigation for removing the existing canopy, the new station will feature a display detailing the history of the station as well as documenting the current design. A repair alternative was considered as a part of the analysis and discussed in Chapter 14 of the Environmental Assessment. It was determined that the repair options would not support the purpose and need of the project.

- **Unhoused populations** – comments were received on the unhoused populations in and around the station and the comments focused on providing more support for unhoused individuals.

Response: The conditions that lead to both temporary and chronic homelessness in Atlanta are systemic regional and national issues. MARTA is committed to outreach through its Homeless Outreach and Proactive Engagement (HOPE) program that uses trained social workers to connect those who need it with services and shelter opportunities. MARTA enforces a Code of Conduct to ensure a safe and comfortable experience for all our customers. Our Transit-Oriented Development program is building new affordable housing around some of our stations. MARTA will continue to partner with our local jurisdictions and community organizations to improve conditions for our customers and those needing housing near Five Points Station, but housing is not included in the project. MARTA will follow their TOD guidelines and policies as referenced above for partnering on developments near the site.

- **Alternatives** – these comments were about alternatives to reconnect Broad Street with bus bays and developing an onsite or adjacent bus terminal, or additional considerations for mitigation sure of the of required closure of the plaza during construction and other construction impacts.

Response: Please see the discussion below on Alternatives in response to the suggestions received. Alternatives are discussed in the EA in Section 1.4: Alternatives.

- **Concourse and plaza construction closure** – these comments requested more information on the station closure and how riders would be informed of the service changes.

Response: Please see the discussion below about the closure. The project timeline is discussed in Section 1.3 of the EA and impacts as a result are discussed in the impact sections including Section 2. Transportation and Section 11. Safety and Security.

No changes to the contents of the EA were made as a result of the public comments. In addition to the comments received from the public, MARTA received three letters during the comment period sent via email. A joint letter was sent by Natural Resources Defense Council and the Southern Environmental Law Center, and the other letters were from Central Atlanta Progress/Atlanta Downtown Improvement District and the Metro Atlanta Chamber. Copies of these letters and MARTA's responses are included in Appendix B. These letters provided comments on the alternatives considered in the EA, the impacts of the temporary closure of the concourse and plaza levels, and the outreach related to the closure. The following summarizes the responses to these concerns.

- **Alternatives:** MARTA conducted a concept design study prior to the selection of the preferred alternative, which was carried into the Environmental Assessment as the Build Alternative. The guiding principles as stated in the EA were used during the concept development phase of the project to arrive at a preferred concept. MARTA considered 13 concept options, compared them based on the guiding principles, and narrowed the options to three. Based on coordination with stakeholders, two additional options were considered. These options were compared based on the guiding principles, an intermodal transfer experience evaluation, constructability and cost. These options included concepts for, reconnecting Broad Street with bus bays and developing an onsite or adjacent bus terminal. The concepts were compared and coordinated with stakeholders and were not preferred for technical reasons and cost. Specific details on the options that were considered prior to the selection of the preferred alternative is available in the response to the letters attached hereto as Appendix B. The preferred alternative was presented to the MARTA board on March 9, 2023. Throughout the concept development stage, MARTA met with stakeholders and the public to understand community preferences, site needs, and concerns. Input from this process informed the decision on the preferred alternative. *Section 15: Summary of Public and Agency Participation* of the EA summarizes the outreach during the concept development. The EA compares the Build Alternative to the No-Build Alternative and how they meet the project's purpose and need. Additionally, the EA considered a roof repair alternative, but determined that it did not meet the project's purpose and need and is discussed in *Section 1.4.2 Alternative Considered but Dismissed* and *Section 14.4.2 Feasible and Prudent Avoidance Alternatives*.
- **Closure:** MARTA's decision to temporarily close street access to Five Points Station is based first and foremost on the safety of our customers, neighbors, employees, and our construction teams. The design of the existing Five Points Station, with post-tensioned steel and concrete beams across the length of the building, makes it difficult to phase the deconstruction of the existing canopy in a way that would allow MARTA to safely maintain an open entrance. These beams must be removed in a specific order using a very large crane that will swing across the entire site. The deconstruction plan is detailed in *Section 1.4.2* of the draft EA and additional details are provided in *Section 14.4.2.2*.

MARTA has fully considered the adverse effects of the temporary closure on our customers and is developing a robust service detour and outreach plan, with details in Appendix B, to mitigate any effects. MARTA notes that while inconvenient these closures are temporary, and our detour plans provide customers with alternate destinations that fall within an acceptable half-mile walkshed (considered the standard radius for reasonable transit access). Buses that currently pass by Five Points Station will continue to do so, and customers may board and alight adjacent to Five Points Station if they prefer not to walk or are unable to walk from a nearby rail station.

The intent of the EA is to disclose impacts from the project and if warranted, the mitigation. The EA discloses the need to relocate bus operations during construction as well as the mitigation for the impact, which is the preparation of the service detour and outreach plan. The draft EA did not include all of the details of the service and detour plan itself because it requires extensive coordination across all departments of MARTA and with dozens of external stakeholders, work

that is still ongoing. At the time of the drafting of the EA, we disclosed what was known at that time. *Section 2.3.2.2* includes details about the process and tactics we intend to use in developing the service and detour plan and to inform our customers about that plan. Additional detail is provided in the response to the letters in Appendix B.

- **Closure Outreach:** The proposed service detour and outreach plan is the proposed mitigation measure to address the expected temporary construction impacts. In the interest of transparency, we offer the most current details about the plan in the response letters in Appendix B, with the understanding that it will be subject to revision up to the time of closure and beyond, as we assess travel patterns and behavior. Every effort is intended to minimize disruption to our customers and ensure they can reach their destinations quickly and safely. The service detour and outreach plan emphasizes customers most directly affected. Appendix B has details on elements of the service detour and outreach plan to keep customers informed and able to make travel decisions during construction, below lists the affected customers and strategies for bus detours.

Previous Public and Agency Outreach

A Technical Feasibility Analysis of Five Points Station, including potential reconnection of Broad Street from Marietta Street to Alabama Street, was conducted beginning in 2016 and running through June 2019. The purpose of this initial study was to document the existing conditions at Five Points Station through a review of previous studies and new technical analysis to propose feasible concepts for future station improvements and upgrades to enhance user experience.

During this feasibility study process, MARTA engaged the City of Atlanta, and neighboring developers in evaluating the costs and schedule relating to dismantling the existing MARTA Five Points Station canopy and alternatives for connecting the station to Broad Street. MARTA conducted public engagement for the More MARTA program in 2016 and 2017 and conducted community outreach for the programming and financial planning of the More MARTA referendum from October 2018-June 2019. This included the Five Points Station Transformation.

Upon completion of the Technical Feasibility Study, MARTA began the concept design process to further develop the vision. MARTA conducted regular coordination with key stakeholders at project milestones, including the City of Atlanta, Central Atlanta Progress (CAP), Atlanta Downtown Neighborhood Association (ADNA), as well as the primary developers of the adjacent sites, including CIM Group and Newport Development among others through each stage of project development. Public engagement activities for the conceptual design of the Five Points Transformation Project were conducted between September 18, 2022, and December 9, 2022. The public was supportive of the project and generally focused comments on safety and security of the station. The first event was a pop-up event on September 18, 2022, at Five Points Station where the concepts were displayed and participants asked for feedback. Over 200 people were engaged during the event. MARTA held a virtual and in-person Open House on October 18, 2022, with over 120 participants in attendance. MARTA held six additional pop-up events at MARTA end-of-line stations in November 2022 at Indian Creek, College Park, H.E. Holmes, Bankhead, Doraville and North Springs stations. The primary comments received during these events focused on station safety and cleanliness, activation of the station area with more art and better signage, and improved pedestrian accommodations. In total between in-person events and online engagement

approximately 2,012 people were engaged in the process providing 692 comments. Common themes for desired improvements were a more welcoming atmosphere, increased safety, better pedestrian access, and inclusion of local art/artists.

Section 106 Coordination

FTA coordinated with the Georgia State Historic Preservation Office (SHPO) throughout the development of the EA because of the presence of resources that are eligible for the National Register of Historic Places (NRHP). In a letter dated April 27, 2023, the Georgia SHPO found that Five Points Station is eligible for the NRHP. In a letter dated October 4, 2023, the Georgia SHPO concurred with the Adverse Effect determination for Five Points Station. The FTA sent a consultation letter to the Eastern Band of Cherokee Indians and Porch Band of the Creek Indians on September 25, 2023. Neither tribe requested to participate.

MARTA met with SHPO and FTA on October 20, 2023 to discuss mitigation options for the adverse effect to Five Points. This was followed up with a meeting with representatives from consulting parties to present and discuss potential mitigation measures. The following consulting parties met on October 25, 2023:

- Georgia Trust for Historic Preservation
- City of Atlanta Urban Design Commission
- Central Atlanta Progress/Atlanta Downtown Improvement District
- Preserve Atlanta
- Neighborhood Planning Unit – M
- Atlanta Downtown Neighborhood Association

The consulting parties provided input on the mitigation measures which were incorporated into the Memorandum of Agreement to be signed by FTA, SHPO and MARTA (January 9, 2024).

VI. Environmental Documentation and Findings

The FTA is the federal lead agency under NEPA for the Five Points Transformation Project. MARTA will construct the Project in accordance with the mitigation measures presented in the EA. MARTA prepared the EA, with FTA oversight, in compliance with NEPA, 42 U.S.C. § 4321, et. Seq., and 23 CFR Part 771.

After reviewing the EA and supporting documents, FTA finds that the Project will result in permanent or construction impacts to Transportation, Air Quality, Historic Resources, Noise and Vibration, Safety and Security and Section 4(f). The following resource categories will have limited or no adverse impacts related to the Project: Land Use, Hydrology and Water Quality, Environmental Justice, Visual and Aesthetic Conditions, Natural Resources, Hazardous Materials, Utilities or Indirect and Cumulative Effects.

Pursuant to 23 CFR § 771.221, FTA finds that, with mitigation to which MARTA has committed, the Project will have no significant impact on the environment.

Transportation

During construction, existing bus service will need to be temporarily relocated to neighboring stations while the plaza level of Five Points Station is closed. Modifications to bus routes and service changes will be planned prior to closure. Routes that terminate at Five Points Station will be routed to other rail stations including Georgia State, King Memorial and Civic Center. The MARTA service planning team will prepare a temporary service plan for each route and assess each station's ability to accommodate the temporary changes. The temporary service plans will be provided to the public prior to the changes occurring. Standard procedures for informing the public on bus route changes will be followed. Notifications on service changes will be made at least 30 days prior to changes and published with station information signs, at bus stops serving the impacted routes, and through MARTA communication channels including the web site and social media.

MARTA and its partners at the City of Atlanta recognize that the impacts from construction of this project will be disruptive for customers who enter and exit Five Points Station, as well as the surrounding community. MARTA will go beyond the standard procedures to diligently inform both its customers and the public about the project and its impacts through advanced notifications and ongoing communication throughout the construction period. This comprehensive strategy includes system-wide rider alerts, specialized training for bus and service operators, digital and print notifications, strategic signage, wayfinding, and media campaigns.

Air Quality

In general, construction-related effects of the Project will be limited to short-term increased fugitive dust and mobile-source emissions during demolition. State and local regulations regarding dust control and other air quality emission reduction controls will be followed, including Rules and Regulations for Air Quality Control outlined in Chapter 391-3-1, Rules of GA EPD.

Fugitive dust is airborne particulate matter, generally of a relatively large particulate size. Construction-related fugitive dust will be generated by demolition of existing structures and haul trucks, concrete trucks, delivery trucks, and earth-moving vehicles operating around the construction sites. This fugitive dust will be caused by particulate matter that is re-suspended by demolition of concrete structures, vehicle movement over paved and unpaved roads, dirt tracked onto paved surfaces from unpaved areas at access points, and material blown from uncovered haul trucks.

Generally, the distance that particles drift from their source depends on their size, the emission height, and the wind speed. Small particles (30 to 100 micron range) can travel several hundred feet before settling to the ground. Most fugitive dust, however, is comprised of relatively large particles (that is, particles greater than 100 microns in diameter). These particles are responsible for the reduced visibility often associated with this type of construction. Given their relatively large size, these particles tend to settle within 20 to 30 feet of their source.

To minimize the amount of construction dust generated, the mitigation measures below are recommended:

Site Preparation/Demolition:

- Use watering equipment to minimize dust generated from demolition

- Cover trucks when hauling dirt, concrete or other materials
- Stabilize the surface of debris piles if they are not removed immediately
- Use windbreaks and curtains to prevent accidental dust pollution
- Limit vehicular routes to and from the site

Construction:

- Cover trucks when transporting materials
- Minimize unnecessary vehicular and machinery activities

Post-Construction:

- Remove unused material
- Remove debris piles

Historic Resources

In compliance with Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended (54 U.S.C. § 30610 et seq.), and its implementing regulations at 36 CFR Part 800 and in accordance with the Criteria of Adverse Effect described in 36 CFR § 800.5, FTA determined that the Project has an Adverse Effect on one historic property, Five Points Station. This finding is based on project activities that will remove and alter contributing features to this exceptionally significant resource, including the demolition and replacement of the existing station canopy. The Georgia State Historic Preservation Office (SHPO) concurred with this determination on October 4, 2023.

MARTA met with SHPO and FTA on October 20, 2023 to discuss mitigation options for the adverse effect to Five Points. This was followed up with a meeting on October 25, 2023, with representatives from Section 106 consulting parties to present and discuss potential mitigation measures.

The adverse effect to Five Points Station will be minimized through mitigation agreed to in the consultation process under Section 106 of the National Historic Preservation Act of 1966. It would not be possible to design the Project to avoid physical effects to the station canopy and plaza elements. Mitigation for the adverse effect will include that the resources are documented in accordance with the standards and guidelines of the Historic American Buildings Survey (HABS) for Level II Documentation (www.nps.gov/hdp/standards/index.htm). Unless otherwise agreed to by the NPS and the SHPO, MARTA will ensure that all documentation is completed and accepted in writing by the NPS, FTA and SHPO prior to demolition. Additionally, MARTA will make arrangements for the development and installation of interpretive panels regarding Five Points Station and the history of the surrounding area. The purpose of the panels is to inform the public about the Five Points Station and its construction and development and provide historic context as one of the first public transit stations in Atlanta. An additional panel will be used to inform people about the surrounding area and other nearby historic features.

The mitigation measures are incorporated in the Memorandum of Agreement (January 9, 2024) between FTA, SHPO and MARTA, included as Appendix C. Based on the analysis in the EA as well as consultation

with SHPO, and other Section 106 consulting parties, and execution of the MOA, FTA finds in accordance with 36 CFR Part 800, that the Section 106 coordination and consultation requirements for the Project have been fulfilled.

Noise and Vibration

The principal construction activities associated with the Project consist of the demolition of the existing station canopy, the construction of the new canopy, and the demolition and redesign of the plaza area entirely within the same geographic footprint of the existing plaza. Construction activities associated with demolition of the existing canopy and the construction of a new open-air canopy would likely generate outdoor noise that could be perceived and potentially result in some periodic annoyance to outdoor activities within 200 feet of the construction work. The magnitude of noise would depend on the particular construction equipment being used, its duration of use and any intervening shielding by buildings or other obstacles between the noise generating construction activity and the listener. In general, the most intrusive construction noise activity is associated with impact pile driving which will not be necessary for the construction of the new canopy. However, other types of construction equipment likely to be used such as jackhammers, pneumatic tools, cranes and ram hoes are fairly loud activities that can be heard for distances of up to 200 feet and result in temporary annoyance. In addition, other activities, such as dropping debris in dump trucks, loud back-up safety alarms and demolition trucks driving in close proximity to sensitive receptors can result in annoyance to people living or working nearby.

There are means and methods for mitigating unwanted noise from a construction project. The use of quieter equipment and implementation of alternative methods for performing certain tasks will be required. These measures may include using enhanced exhaust mufflers and enclosing the entire construction site with a 12-foot-tall ply-wood perimeter barrier. The perimeter barrier will reduce noise levels by a minimum of 5 to 7 dB(A) and make the construction work less visible to the surrounding communities. The City of Atlanta Ordinance does not allow for construction activities after 8 PM and before 7 AM in the morning so no construction will occur during sensitive nighttime hours. Exclusions outlined in Section 74-132 of the Noise Control Ordinance are only granted in cases of public safety emergencies or restoring water or power to the public caused by natural storm events. Moreover, in the case of MARTA construction related work, the ordinance indicates that MARTA must develop and implement procedures by which contractors conducting planned new construction must be monitored to ensure that the work is performed in a manner that will result in the creation of the least amount of noise disturbance.

In general, utilizing noise control and best management practices measures would ensure exterior noise levels remain below the FTA daytime 80 dB(A) limit near residential properties and below 85 dB(A) near businesses such as the nearby Fairfield Inn & Suites (Site #3) and the active recreation areas (Sites #2 and #4) in the study area. The predominantly non-residential character of the area adjacent areas and the relatively high existing ambient noise levels, it is unlikely there would be adverse noise effects from construction activities. Potential measures and best practices that can be employed include the following:

- Comply with all the requirements of the City of Atlanta City of Atlanta Noise Ordinance Regulations.

- Require the contractor to conduct construction work in a manner that will result in the creation of the least amount of noise which may require periodic ambient noise monitored as to ensure noise levels near residential properties do not exceed 80 dB(A) or 85 dB(A) near commercial properties that are within 300 feet of the construction boundary.
- For back-up alarms, use either audible self-adjusting back-up alarms or manual adjustable alarms.
- If possible, equip all impact and drilling equipment such as jackhammers, hoe rams, core drills, direct push soil probes and rock drills with a muffler.
- Route construction equipment and heavy truck vehicles carrying rock, concrete, or other materials over truck designated routes that will cause the least disturbance to noise-sensitive locations.
- Prohibit slamming of dump truck tail gates and operate equipment in such a manner to minimize banging, clattering, buzzing, and other annoying types of noises.
- To restrict the transmission of noise, construct a temporary 12-foot-tall plywood based noise barrier wall around the parameter of the station reconstruction zone.
- Maintain an honest communication with businesses and residences within the general station area by informing the public of all upcoming construction work.
- Maintain a log of any complaints.

Safety and Security

The plaza and concourse levels will be temporarily closed during construction. The Contractor is required to follow MARTA's SAQ-PL-1006: Safety & Security Certification Program Plan for in depth details along with SAQ-FO-5001C: Safety and Security Certification Required Documentation Form. The Site Specific Safety Plan will include at a minimum: Site Security Plan and Site Safety Plan. The Contractor is responsible for the security of the construction site and the MARTA Police Department will still have responsibility for overall station security. The Site Safety Plan will detail the Contractors safety procedures, provide a Safety Manager and address safety for equipment use and oversight.

Section 4(f)

In general, Section 4(f) of the USDOT Act of 1966, as amended (23 CFR Part § 774, codified in 49 U.S.C. 303 and generally referred to as "Section 4(f)") prohibits the Secretary of Transportation from approving projects that use publicly owned parks, recreation areas, wildlife and waterfowl refuges, or any significant historic sites unless a determination is made that there is not a prudent or feasible alternative to using that land, and that all possible planning has been done to minimize harm.

The existence of potential Section 4(f) resources was evaluated in the EA and Section 4(f) Evaluation. Based on the evaluation in the EA, the Project results in the permanent incorporation through demolition of one historic resource identified as part of the Section 106 process. The demolition of the Five Points Station canopy and plaza was determined to be an adverse effect under Section 106 and

determined to constitute a “use” under Section 4(f). To mitigate these effects, MARTA will implement the measures identified in the executed MOA (see Appendix C) between FTA, SHPO and MARTA. The Section 4(f) Evaluation was sent to the U.S. Department of the Interior on December 4, 2023, and they responded on January 17, 2023, that they have no objection to the approval of the Section 4(f) Evaluation.

VII. Conclusion

Based on the FTA’s review of the analysis presented in this FONSI, the accompanying EA and Section 4(f) Evaluation of the Five Points Station Transformation, dated November 2023, agency and public comments received on the EA and responses to comment, and MOA for mitigation of the adverse effect to Five Points Station, FTA finds that the EA is consistent with the requirements of 23 CFR § 771.121. Therefore, FTA is issuing this FONSI for the Five Points Station Transportation Project. This finding is conditioned upon MARTA complying with the mitigation measures described in the FONSI, the EA and relevant attachments.



Yvette G. Taylor, Ph.D.
Administrator, Region IV
Federal Transit Administration

3-25-2024

Date

Appendices

Appendix A – Environmental Assessment Notice of Availability and Invitations to Comment

Appendix B – Public Comments and Responses

Appendix C – Memorandum of Agreement

Appendix D – Agency Correspondence

APPENDIX A

ENVIRONMENTAL ASSESSMENT NOTICE OF AVAILABILITY AND INVITATIONS TO COMMENT

SPORTS

HOCKEY NOTES

After a death by skate cut, IIHF to mandate neck guards

New rule would apply to Olympics but not pro leagues.

Associated Press

The International Ice Hockey Federation announced it is making neck guards mandatory for all levels of competition in the tournaments it runs, including the Olympics and men's and women's world championships.

The mandate would not apply to professional leagues, including the NHL, which currently does not have any cut-proof safety requirements for players. Any sort of mandate in the NHL would require an agreement between the league and players' union, which have been discussing skate blade safety for years.

The IIHF's move comes after the death of American Adam Johnson, whose neck was cut by a skate blade during a game in England in late October. Johnson's death at age 29 is being investigated, and the on-ice tragedy has sparked significant debate around the sport about the need for more protection of the neck, wrists and legs.

The exact date for the IIHF

neck guard mandate to go into place is still to be determined, based on the supply of neck guards available.

"The IIHF remains in close contact with its suppliers to ensure they are able to respond to the current high demand," the organization said. "Until the rule officially goes into effect, the IIHF continues to strongly recommend that neck laceration protectors are worn by all players performing in an IIHF competition."

Before now, the IIHF initially had neck protection rules only for under-20 and under-18 play, so neck guards were already mandatory in tournaments like the world junior championship. The organization that governs hockey around the world decided to widen the order based on the recommendation of its medical committee.

The English Ice Hockey Association, which governs the sport below the Elite League where Johnson played, reacted to his death by requiring all players in England to wear neck guards beginning in 2024. Similar to the IIHF, the mandate was not immediate because of supply issues.

NHL VP of hockey operations Rod Pasma addressed general managers last month

on cut-proof equipment. Pasma said players have far more options than a decade ago, including 10 or more choices for wrist, body and Achilles tendon/foot protection but fewer options for neck guards.

"In the neck, we're getting there," Pasma said. "We (did not have) many a month ago, but as it sits today, I think there's up to eight companies on my desk waiting to be cleared, and of those eight there's probably 12-14 options to wear, should they choose."

Several NHL players, including Washington's T.J. Oshie and Tampa Bay's Cole Koepke, have donned neck guards for games this season in light of Johnson's death.

NHL draft coming to Las Vegas: The last centralized NHL draft for the foreseeable future is going out with the glitz and bright lights of Vegas. NHL Commissioner Gary Bettman said Tuesday the league is moving forward with holding the 2024 draft at The Sphere in Las Vegas, the new venue that opened in September and bills itself as the largest spherical structure in the world.

Bettman, after the league's Board of Governors wrapped up two days of meetings in Seattle on Tuesday, said

contracts still need to be finalized, but the league is excited about the possibilities for the draft. The draft is expected to be the first sporting event held at The Sphere and a showcase opportunity for the league before the draft decentralizes starting in 2025.

Raising Arizona: Bettman declined to give specifics on reports of the Arizona Coyotes moving closer to finding a possible arena site in the Phoenix area, with the team currently playing at 5,000-seat Mullett Arena on the Arizona State campus. He mentioned the team is hoping something can be finalized soon and in enough time for the league to start on next year's schedule.

As for expansion, Bettman said it is not something that is "front-burner" at this time despite getting regular interest from Quebec City, Atlanta, Houston and Salt Lake City. "We don't envision anytime in the foreseeable future doing what we've done in the past saying, if you want an expansion team, here's the date, file your application. That's not it. We'll listen to expressions of interest, but (will) one of them come to fruition? Presently, I'm not focused on it," Bettman said.

Baker

continued from B1

ently than the rest. Conference realignment starting in 2024 will move the Pac-12 out of that group.

The proposed shift would not require all members of a conference to be part of the new subdivision. Schools would be allowed to make that determination individually.

Baker noted athletic budgets in Division I range from \$5 million and \$250 million annually, with 59 schools spending over \$100 million annually and another 32 spending over \$50 million. He said 259 Division I schools, however, spend less than \$50 million on their athletic programs.

Baker said the difference in the way schools that participate in revenue-generating college sports such as major college football and basketball operate and the vast majority of college sports is complicating attempts to modernize the entire enterprise.

"The contextual environment is equally challenging, as the courts and other public entities continue to debate reform measures that in many cases would seriously damage parts or all of college athletics," he wrote.

Baker and college sports leaders have been pleading with Congress to help the NCAA with a federal law to regulate the way athletes can be paid for NIL deals.

"I am 100% supportive of your efforts. Intercollegiate Athletics needs the proactive and forward thinking you are providing," Ohio State AD Gene Smith said in a post on social media platform X. Smith oversees one of the largest athletic departments in the country with operating expenses of above \$225 million annually.

The NCAA is also facing a

new round of legal threats that could force its members to share some of the billions in revenue generated by major college football and basketball, along with giving athletes employees status. One antitrust case working its way through federal court could cost the NCAA billions in damages.

Baker called on NCAA member schools to create a new framework to make what he called "fundamental changes."

"First, we should make it possible for all Division I colleges and universities to offer student-athletes any level of enhanced educational benefits they deem appropriate. Second, rules should change for any Division I school, at their choice, to enter into name, image and likeness licensing opportunities with their student-athletes," he wrote. "These two changes will enhance the financial opportunities available to all Division I student-athletes."

Currently, school are allowed – though not required – to provide athletes \$5,980 per year in educational benefits under NCAA rules.

Baker said the changes would help level the playing field between men's and women's athletics by forcing schools to abide by gender equity regulations as they invest. He said schools in a new tier of Division I should be allowed, while staying compliant with Title IX, to "invest at least \$30,000 per year into an enhanced educational trust fund for at least half of the institution's eligible student-athletes."

A new D-I subdivision should also allow members to create rules unique rules regarding "scholarship commitment and roster size, recruitment, transfers or NIL," he said.



Georgia and Alabama square off at the line of scrimmage in Saturday's SEC Championship game at Mercedes-Benz Stadium. Alabama won 27-24 and earned a CFP berth. "Only thing we can say is, they whipped us up front," UGA coach Kirby Smart said. "They have big, big humans." HYOSUB SHIN/HYOSUB.SHIN@AJC.COM

Cunningham

continued from B1

that they got," Saban said. "Now, this validates (them). Winning the SEC, beating Georgia, the No. 1 team, kind of validates who they are."

That seemed improbable for much of the season, but the Tide made it happen with their eighth victory in 10 games against top-ranked teams with Saban as coach. Now Alabama can add a second national title to sandwich around Georgia's back-to-back championships. They can prove that outsiders shouldn't be too quick to write them off.

That shouldn't need to be said. Alabama won three of the past eight national titles and was runner-up three times during that span. But the standards are so high in Tuscaloosa that two years without a national title had outsiders searching for the next Alabama. Smart's Bulldogs are the obvious choice for that distinction.

Or at least they were before losing a third consecutive time to Alabama in the SEC Championship game. The Bulldogs won back-to-back national championships finished 8-0 in the SEC for

three consecutive seasons and compiled a 29-game win streak. But they still couldn't escape the Bama bogeyman.

It seems that there can only be one Alabama so long as Saban is coach.

"It's not about me," Saban said. "It's about everybody on the team who contributed to the success of this team, players and coaches alike."

That's true. But players and assistants have come and gone at Alabama. Saban, 72, stays and keeps winning. He's not fading away.

Saban still recruits at an elite level. Alabama's defense has five freshman and sophomores starting and five other underclassmen as primary backups. It's Saban's best defense in years. The Tide have figured out a way to score enough points without the top NFL prospects at quarterback and wide receiver they've had in years past.

When the Tide ended Georgia's national title aspirations before, those great skill players produced explosive offensive plays. This time, Alabama beat Georgia with old-fashioned bully ball. The Bulldogs hadn't faced a defense as good as Bama's, and it showed.

The Tide are ranked eighth nationally in

defensive SP+ (efficiency adjusted for opponent, situation and tempo) and 17th in scoring defense. None of UGA's other 12 opponents rank better than 21st in SP+ or 36th in points allowed. Faced with a foe who could match them physically, the Bulldogs were stopped on four of their six third-and-short plays.

"Only thing we can say is, they whipped us up front," Smart said. "They have big, big humans. People always say, 'Georgia can run the ball.' It's hard to run the ball when they have good size in there. They're a physical front."

That's been the calling card for Georgia's defense under Smart. It's been clear all season that, while they were still very good defensively, the Bulldogs have slipped. That's to be expected when the past two NFL drafts featured six ex-Georgia linemen and linebackers among the first 30 picks. It's difficult to replace so many talented players without a drop-off in production.

Saban knows all about that.

Alabama's defense declined as its best players went on to be paid for their labor. The Tide produced a steady stream of skill players who were

coveted by NFL teams, including two quarterbacks drafted No. 1 overall (Tua Tagovailoa and Bryce Young). Now the Tide are in position to win a national title with a quarterback who'd been benched for performance (Jalen Milroe) and no running backs or pass-catchers who are projected as top NFL prospects.

Georgia will continue to challenge Alabama for college football supremacy. The 12-team CFP that begins next season will provide a larger margin for error. It's hard to imagine the Bulldogs ever being left out of a playoff field that big (of course, the same thing goes for Alabama).

Truthfully, the Tide shouldn't be in this year's CFP field. They benefited from the determination of decision-makers to leave out undefeated Florida State in favor of the one-loss SEC champion. The Seminoles got robbed (the Bulldogs did not). The Tide are fortunate the CFP has a sham selection committee.

None of that will matter for the record books. Saban gets a chance to add another trophy to his case and remind everyone that there can only be one Alabama so long as he's the coach.

DAILY LAW JOURNAL

legal notices

NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL ASSESSMENT FOR THE FIVE POINTS STATION TRANSFORMATION

The Federal Transit Administration (FTA) and the Metropolitan Atlanta Rapid Transit Authority (MARTA) announce that the Draft Environmental Assessment (EA) is available for public review and comment.

The Draft EA analyzes and discloses the potential environmental impacts and proposed mitigation strategies associated with the Five Points Station Transformation in Atlanta, Fulton County, Georgia. MARTA will host an in-person public open house on the Draft EA to be held at Five Points Concourse Level, 30 Alabama St SW, Atlanta, GA 30303, from 4 p.m. to 7 p.m. on Thursday, Dec. 14, 2023. Representatives from MARTA and their consultants will provide information about the Draft EA.

The comment period is open as of Friday, Dec. 1, 2023, and closes on Friday, Jan. 5, 2024, at 11:59 p.m. Comments can be provided to MARTA:

· By Mail: MARTA Five Points Transformation, attn Tracie Roberson, 2424 Piedmont Road NE, Atlanta, GA 30324-3311. By e-mail: publichearinginfo@itsmarta.com · Online: www.fivepointstransformation.com

By phone: 404-848-5299

Written comments must be postmarked, and emails, phone messages and online comments must be sent by no later than 11:59 p.m. (Eastern Time), Friday, Jan. 5, 2024.

The Draft EA is available for review online (www.fivepointstransformation.com). Copies of the EA are available to the public for review at:

· MARTA Headquarters: 2424 Piedmont Road, NE, Atlanta, GA 30324-3311

· MARTA Five Points Station: 30 Alabama Street, SW, Atlanta, GA 30303

· Central Library: One Margaret Mitchell Square, Atlanta, GA 30303

Copies of the EA are available by sending your request to Planning Department at the above address for MARTA Headquarters. Copies of the environmental document will be available at the public open house for public review.

12-6-23

0000816483-01

legal name change

Entity Name: MICHELLE DANIELS
Effective Date: 11/28/23
Name Reservation Number: 26195947
Filer Name: Michelle Daniels
Filer Address: 4218 Sentinel Place NW, Kennesaw Georgia, USA
12-6-23

0000816220-01

legal notice to bid

INVITATION FOR BIDS METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY (MARTA) will accept Bids as follows: RFP P50358 TOD Kensington Station. Pre-Proposal Conference January 9, 2024 at 10:00AM, MARTA Headquarters. Proposal Submittal February 28, 2024 at 2:00PM. For more information contact Consuela Glass at cglass1@itsmarta.com. Solicitation documents and opportunities can be viewed on MARTA's website. Contact MARTA's Contract Control Office at 404-848-5580 to purchase Bid documents or CDs when applicable. Bid documents should be received at MARTA's Annex Building, 2400 Piedmont Road, NE, Atlanta, GA 30324 by the aforementioned date and local time. Envelopes containing bids MUST BE marked with the Bid Number. Contracts are subject to Federal Grant Regulations and to MARTA's Resolution on Equal Opportunity prohibiting discrimination based on race, color, sex, religion or national origin.

View MARTA's Home Page About MARTA http://www.itsmarta.com

0000816393-01

legal public auction

Extra Space Storage, on behalf of itself or its affiliates, Life Storage or Storage Express, will hold a public auction to sell personal property described below belonging to those individuals listed below at the location indicated:

Facility 1: Life Storage, 3600 Welcome All Rd, Atlanta, GA 30331, December 21, 2023, at 12:00 pm

Larry Knowles 1A25 Household Items
Dexter Buford Jr. 1F10 Household Items
Darnell Brown 1F16 Household Items
Virishia Walls 2D01 Household Items
Rashad Majeed 2E11 Household Items
MICHAEL MORGAN 2E16 Household Items
Ashley White 3A19 Household Items
Dedrick Shipman 3B09 Household Items
chiya summers 3C01 Household Items
Phillip Lewis4B04 Household Items
Charles Jones 4G10 Household Items

Facility 2: Life Storage, 3850 Welcome All Rd, Atlanta, GA 30349, December 21, 2023, at 1:00 pm.

Ginnelle Duncan 123 Household Items
Helena Johnson 316 Household Items
Felicia Morton 3A03 Household Items
Andrea Harris 619 Household Items
Kelvin Anderson 639 Household Items
Shawn Maye 730 Household Items
Andrew Reynolds 7522 Household Items
Joanne Collins 802 Household Items
Latagea Wyatt 819 Household Items
Santrella Booker 831 Household Items
Julian Fair 904 Household Items
Dajia Campbell 9207 Household Items
Stephen Larbi-Amoah 939 Household Items
Terrica Bragg 9405 Household Items

The auction will be listed and advertised on www.storageexpress.com. Purchases must be made with cash only and paid at the above referenced facility in order to complete the transaction. Extra Space Storage may refuse any bid and may rescind any purchase up until the winning bidder takes possession of the personal property.

12-6, 13-23

0000816433-01

legal liquor license

NOTICE IS GIVEN THAT AMAN2015 LLC, DBA: NORTHDRIVE BOTTLE SHOP, 1223 CAULEY CREEK OVERLOOK, DULUTH, GA 30097, AND HAS APPLIED FOR A LICENSE TO SELL BEER, WINE, AND LIQUOR AT RETAIL AT 8333 ROSWELL RD., SUITE 200, SPRINGS, GA 30350

12-6-23

0000816186-01

We follow the facts.

ajc.com The Atlanta Journal-Constitution

Comment on Five Points Station Transformation Environmental Review



We invite you to provide comments for the federal environmental review of the Five Points Transformation project. Comments are due by Friday, January 5, 2024.

Please provide public comments online, over the phone, via email, or in person at our open house on Thursday, December 14 from 4 - 7pm at the Five Points Concourse.



Make a comment at
fivepointstransformation.com

 **404-848-5299**
 publichearinginfo@itsmarta.com

To request this information in another language or an accessible format, please call: 404-848-4037

Comente sobre la evaluación ambiental de la transformación de la estación Five Points



Le invitamos a proporcionar comentarios como parte del proceso de evaluación ambiental federal. La fecha límite para comentarios es el Viernes, 5 de Enero.

Pedimos que haga comentarios públicos en nuestro sitio web, por teléfono, por correo electrónico o en persona en nuestra jornada de puertas abiertas el Jueves, 14 de Diciembre en Five Points Concourse.



Haga un comentario en

fivepointstransformation.com



404-848-5299



publichearinginfo@itsmarta.com

Para solicitar esta información en otro idioma o en un formato accesible, llame al: 404-848-4037

APPENDIX B

PUBLIC COMMENTS AND RESPONSES



Draft EA Public Comment Summary MARTA Five Points Station Transformation

March 2024

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LIST OF ACRONYMS

ADNA	Atlanta Downtown Neighborhood Association
CAP	Central Atlanta Progress
EA	Environmental Assessment
MARTA	Metropolitan Atlanta Rapid Transit Authority
NEPA	National Environmental Policy Act
FTA	Federal Transit Administration

1. Introduction

The National Environmental Policy Act (NEPA) public comment period for the Environmental Assessment (EA) of MARTA's Five Points Station Transformation concluded on Friday, January 5, 2024.

2. Circulation of the Environmental Assessment

Notice of Availability for the EA was published in the Atlanta Journal-Constitution, a newspaper serving Atlanta and Fulton County, Georgia, on December 6, 2023. The EA was available for review in the following locations: 1) Five Points MARTA Station Ride Store; 2) Fulton County Central Library; 3) MARTA Headquarters and 4) online at www.fivepointstranformation.com and linked on www.itsmarta.com. The comment period was open until January 5, 2024.

On December 14, 2023, MARTA held a public open house meeting to present and receive comments on the findings of the EA and mitigation measures. The meeting was held at the Five Points Station at 30 Alabama Street, SW, Atlanta, Georgia from 4:00 p.m. until 7:00 p.m. Approximately 200 people attended the public open house meeting and 44 comment forms were received at the meeting. The public was also invited to comment online, through the MARTA public hotline, by email and mail. Fifty-four (54) were received online specifically in response to the EA. An additional 143 comments were received in general response to the project during the project comment period from December 6, 2023 to January 5, 2024. Six (6) email comments were received and no comments were received through the hotline. MARTA received three (3) letters with comments from stakeholders, with responses attached.

3. Summary of Comments

The comments were tracked and collected in a master database that is attached as Appendix A. Each of the comments were categorized by topics. Those topics and the responses are listed below. Comments received were generally supportive of the project and the design elements. Comments were categorized as follows:

- **Accessibility/Connectivity** – ensuring that the project improves access, signing, and wayfinding and maintains systems to move between levels.
Response: The project purpose and need includes improving site access and making more seamless connections across the site. The need for better access is discussed in *Section 1.2.1 Enhance Site Access and Safety* in the EA. The alternatives were compared based on their ability to achieve this objective. Additional comments on access preferences and requests for improved site signing and wayfinding have been passed to the design team for inclusion in the final design process.
- **Amenities** – comments were focused on site amenities including restrooms, vendors and retail elements, more seating, covered shelters for buses, and other features for comfort and convenience.
Response: The project will provide additional amenities, such as community garden space, seating, Station Soccer, and more greenspace on site and existing amenities currently offered at the station will continue to be offered at the station. These comments have been shared with the design team to be considered during final design. This is discussed in *Section 1.3: Project Description* and *Section 1.4: Project Alternatives* of the EA.

- **Sustainability** – commentors supported sustainable elements of the design and prefer features that require less maintenance and the use of environmentally friendly materials.

Response: Sustainability principles are included in the conceptual design and are included to help manage stormwater with more vegetative areas on the site. Sustainability elements being considered can be found in the *Concept Report in Appendix B* of the EA.

- **Value** – a few comments questioned the cost of the improvements and would like to see MARTA use the resources for service expansion and other improvements.

Response: Improvements to the Five Points Station have been identified as a long-standing need, and because of the extent of the improvements needed at this station, MARTA is taking the opportunity to invest in a more comprehensive renovation of the station to provide a long-term benefit rather than a short-term repair. The upfront capital cost provides long term benefits in reduced operations and maintenance costs from the redesign of the station. Maintenance of the existing station is costly and the life span is unknown because of the series of prestressed precast concrete of the existing canopy. For these reasons, the renovation is more cost effective and will provide ease of maintenance in future years as discussed in the EA in *Section 14.4.2.2: Repair Existing Canopy and Plaza*. The project is included in the More MARTA Atlanta funding and also has been identified as a need as part of the Station Rehabilitation program as discussed in the EA in *Section 1.1: Project Background*.

- **Safety** – there were many comments on the need for safety improvements and more police presence at the station and on the system.

Response: Safety is the highest priority to MARTA both during construction and after construction for long term safety and security at the station. MARTA is required to meet safety and security standards and regulations in the FTA's Public Transportation Agency Safety Plan (49 CFR Part 673) and National Public Transportation Plan. The Contractor is required to follow MARTA's SAQ-PL-1006: Safety & Security Certification Program Plan for in depth details along with SAQ-FO-5001C: Safety and Security Certification Required Documentation Form. The Site Specific Safety Plan will include at a minimum a Site Security Plan and a Site Safety Plan. This plan will include emergency situations and is discussed in *Section 11: Safety and Security* in the EA. MARTA police will have a station presence during and after construction.

- **Service** – these comments were generally about frequency of service and the need for better integration of service for rail and bus transfers.

Response: The purpose of this project is to renovate the station and does not make changes to service outside of construction. MARTA regularly reviews service plans and makes updates as warranted. These comments on both bus and rail service have been shared with MARTA's service planning team. Impacts to service as a result of construction are discussed below. Service changes are addressed separately by MARTA and service modifications are not a part of the project as discussed in *Section 2: Transportation*. Bus and rail riders will benefit from better connectivity with the station redesign with improved access between the two.

- **Development** – these comments focused on higher density development of the site and including transit-oriented development (TOD) and housing on the Five Points Station site.

Response: The current plan does not include housing or transit-oriented development on the station property. MARTA does collaborate with developers, Invest Atlanta, Central Atlanta Progress, and other partners to support transit-oriented development around our rail station sites. This is discussed in the EA

in *Section 1: Indirect and Cumulative Impacts*. To partner with developers on MARTA has developed specific policies and guidelines for Transit-Oriented Development that can be found here: <https://itsmarta.com/guidelines-policies.aspx>

- **Historic Preservation** – these comments were about options to preserve the historic canopy structure and plaza.
Response: While the new design concept may not align with everyone's preferences, we continue to engage to understand community desires. As part of the mitigation for removing the existing canopy, the new station will feature a display detailing the history of the station as well as documenting the current design. A repair alternative was considered as a part of the analysis and discussed in Chapter 14 of the Environmental Assessment. It was determined that the repair options would not support the purpose and need of the project.
- **Unhoused populations** – comments were received on the unhoused populations in and around the station and the comments focused on providing more support for unhoused individuals.
Response: The conditions that lead to both temporary and chronic homelessness in Atlanta are systemic regional and national issues. MARTA is committed to outreach through its Homeless Outreach and Proactive Engagement (HOPE) program that uses trained social workers to connect those who need it with services and shelter opportunities. MARTA enforces a Code of Conduct to ensure a safe and comfortable experience for all our customers. Our Transit-Oriented Development program is building new affordable housing around some of our stations. MARTA will continue to partner with our local jurisdictions and community organizations to improve conditions for our customers and those needing housing near Five Points Station, but housing is not included in the project. MARTA will follow their TOD guidelines and policies as referenced above for partnering on developments near the site.
- **Alternatives** – these comments were about alternatives to reconnect Broad Street or additional considerations for mitigation to construction impacts.
Response: Please see the discussion below in *3.1 Substantive Comments*. Alternatives are discussed in the EA in *Section 1.4: Alternatives*.
- **Concourse and plaza construction closure** – these comments requested more information on the station closure and how riders would be informed of the service changes.
Response: Please see the discussion below in *3.1 Substantive Comments*. The project timeline is discussed in Section 1.3 of the EA and impacts as a result are discussed in the impact sections including Section 2. Transportation and Section 11. Safety and Security.

3.1 SUBSTANTIVE COMMENTS

In addition to the comments received from the public, MARTA received three letters during the comment period sent via email. A joint letter was sent by Natural Resources Defense Council and the Southern Environmental Law Center, and the other letters were from Central Atlanta Progress/Atlanta Downtown Improvement District and the Metro Atlanta Chamber. Copies of these letters and MARTA's responses are included in Appendix B. These letters provided substantive comments on the alternatives considered in the EA, the impacts of the temporary closure of the concourse and plaza levels, and the outreach related to the closure. The following summarizes the responses to these concerns.

- Alternatives: MARTA conducted a concept design study prior to the selection of the preferred alternative, which was carried into the Environmental Assessment as the Build Alternative. The guiding principles, as stated in the EA, were used during the concept development phase of the project to arrive at a preferred concept. MARTA considered 13 concept options, compared them based on the guiding principles, and narrowed the options to three. Based on coordination with stakeholders, two additional options were considered. These options were compared based on the guiding principles, an intermodal transfer experience evaluation, constructability, and cost. These options included concepts for reconnecting Broad Street with bus bays and developing an onsite or adjacent bus terminal. The concepts were compared and coordinated with stakeholders and were not preferred for technical reasons and cost. Specific details on the options that were considered prior to the selection of the preferred alternative is available in the response to the letters in Appendix B. The preferred alternative was presented to the MARTA board on March 9, 2023. Throughout the concept development stage, MARTA met with stakeholders and the public to understand preferences, site needs, and concerns. Input from this process informed the decision on the preferred alternative. *Section 15: Summary of Public and Agency Participation* of the EA summarizes the outreach during the concept development. The EA compares the Build Alternative to the No-Build Alternative and how they meet the project's purpose and need. Additionally, the EA considered a roof repair alternative, but determined that it did not meet the project's purpose and need and is discussed in *Section 1.4.2 Alternative Considered but Dismissed* and *Section 14.4.2 Feasible and Prudent Avoidance Alternatives*.
- Closure: MARTA's decision to temporarily close street access to Five Points Station is based first and foremost on the safety of our customers, neighbors, employees, and our construction teams. The design of the existing Five Points Station, with post-tensioned steel and concrete beams across the length of the building, makes it difficult to phase the deconstruction of the existing canopy in a way that would allow MARTA to safely maintain an open entrance. These beams must be removed in a specific order using a very large crane that will swing across the entire site. The deconstruction plan is detailed in *Section 1.4.2* of the draft EA and additional details are provided in *Section 14.4.2.2*.

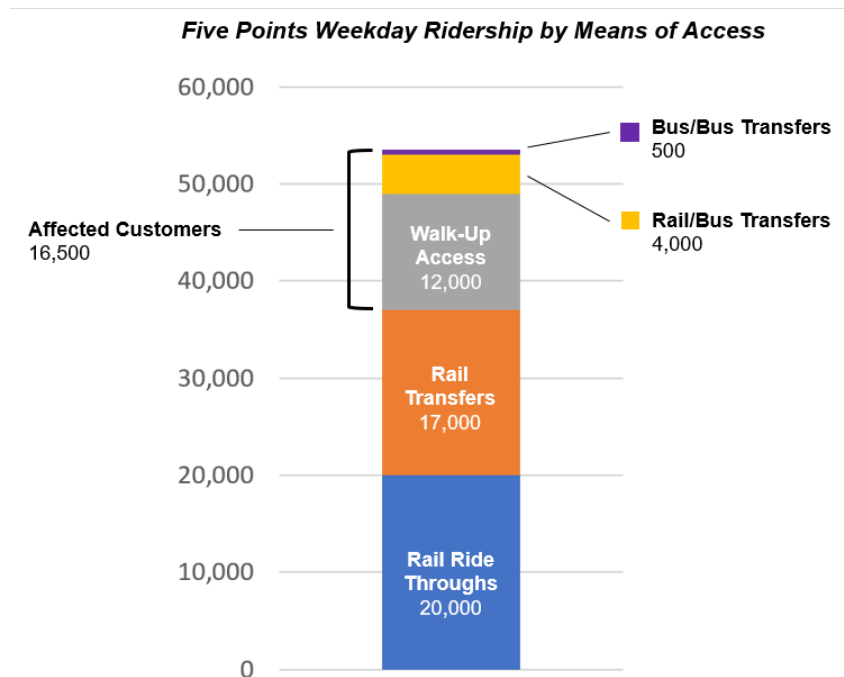
We have fully considered the adverse effects of the temporary closure on our customers and we are developing a robust service detour and outreach plan, detailed below, to mitigate any effects. We note that while inconvenient these closures are temporary, and our detour plans provide customers with alternate destinations that fall within an acceptable half-mile walkshed (considered the standard radius for reasonable transit access). Buses that currently pass by Five Points Station will continue to do so, and customers may board and alight adjacent to Five Points Station if they prefer not to walk or are unable to walk from a nearby rail station.

The intent of the EA is to disclose impacts from the project and if warranted, mitigation. The EA discloses the need to relocate bus operations during construction as well as the mitigation for the impact, which is the preparation of the service detour and outreach plan. The draft EA did not include all of the details of the service and detour plan itself because it requires extensive coordination across all departments of MARTA and with dozens of external stakeholders, work that is still ongoing. At the time of the drafting of the EA, we disclosed what was known at that time. *Section 2.3.2.2* includes details about the process and tactics we intend to use in developing the service and detour plan and to inform our customers about that plan. Additional detail is provided in the response to the letters in Appendix B.

- Closure Outreach: The proposed service detour and outreach plan is proposed mitigation to address the expected temporary construction impacts. In the interest of transparency, we offer the most current details about the plan in the response letters in Appendix B, with the understanding that it will be subject to revision up to the time of closure and beyond, as we assess travel patterns and behavior. Every effort is intended to minimize disruption to our customers and ensure they can reach their destinations quickly and safely. The service detour and outreach plan emphasizes customers most directly affected. Appendix B has details on elements of the service detour and outreach plan to keep customers informed and able to make travel decisions during construction, below lists the affected customers and strategies for bus detours.

Estimate of affected customers (primary audience):

- Approximately 4,500 passengers using buses will be significantly affected by the detours
- Approximately 12,000 walk-up passengers will be within ½ mile of other stations and will have bus options
- Rail ride-through passengers and those making rail transfers will not be affected by detours



Bus Detour strategies:

- Maintain direct Downtown access with stops at Five Points Station on some routes
- Detour bus routes that terminate and layover at Five Points to other nearby stations
- Increase capacity at nearby stations by making temporary transit accommodations such as additional bus bays (coordinated with City of Atlanta)

Rail Station	Five Points Bus Routes Detoured (subject to change)
Georgia State	Route 21 – Memorial Dr Route 42 – Pryor Rd Route 49 – McDonough Blvd Route 55 – Jonesboro Rd Route 186 – Rainbow Dr/South DeKalb
King Memorial	Route 26 – Marietta St/Perry Blvd Route 899 – Old Fourth Ward
Civic Center	Route 816 – North Highland Ave
Through-Routed to Maintain Service to Five Points Area	Route 3 – Martin Luther King Jr Dr/Auburn Ave Route 40 – Peachtree St/ Downtown Route 813 – Atlanta University Center

4. Previous Public and Agency Outreach

A Technical Feasibility Analysis of Five Points Station, including potential reconnection of Broad Street from Marietta Street to Alabama Street, was conducted beginning in 2016 and running through June 2019. The purpose of this initial study was to document the existing conditions at Five Points Station through a review of previous studies and new technical analysis in order to propose feasible concepts for future station improvements and upgrades to enhance user experience.

During this feasibility study process, MARTA engaged the City of Atlanta, and neighboring developers in evaluating the costs and schedule relating to dismantling the existing MARTA Five Points Station canopy and alternatives for connecting the station to Broad Street. MARTA conducted public engagement for the More MARTA program in 2016 and 2017 and conducted community outreach for the programming and financial planning of the More MARTA referendum from October 2018-June 2019. This included Five Points Station Transformation.

Upon completion of the Technical Feasibility Study, MARTA began the concept design process to further develop the vision. MARTA conducted regular coordination with key stakeholders at project milestones, including completion of design stages, changes to project schedules or service disruptions, including the City of Atlanta, Central Atlanta Progress (CAP), Atlanta Downtown Neighborhood Association (ADNA), as well as the primary developers of the adjacent sites, including CIM Group and Newport Development among others through each stage of project development. Public engagement activities for the conceptual design of the Five Points Transformation Project were conducted between September 18, 2022, and December 9, 2022. The public was supportive of the project and generally focused comments on safety and security of the station. The first event was a pop-up event on September 18, 2022, at Five Points Station where the concepts were displayed and participants asked for feedback. Over 200 people were engaged during the event. MARTA held a virtual and in-person Open House on October 18, 2022, with over 120 participants in attendance. MARTA held six additional pop-up events at MARTA end-of-line stations in November 2022 at Indian Creek, College Park, H.E. Holmes, Bankhead,

Doraville and North Springs stations. The primary comments received during these events focused on station safety and cleanliness, function of the station area with better signage, wayfinding, and improved pedestrian accommodations. In total, between in-person events and online engagement, approximately 2,012 people were engaged in the process providing 692 comments. Common themes for desired improvements were a more welcoming atmosphere, increased safety, better pedestrian access, and inclusion of local art/artists.

5. Section 106 Coordination

FTA coordinated with the Georgia State Historic Preservation Office (SHPO) throughout the development of the EA because of the presence of resources that are eligible for the National Register of Historic Places (NRHP). In a letter dated April 27, 2023, the Georgia SHPO found that Five Points Station is eligible for the NRHP. In a letter dated October 4, 2023, the Georgia SHPO concurred with the Adverse Effect determination for Five Points Station. The FTA sent a consultation letter to the Eastern Band of Cherokee Indians on September 25, 2023. Neither tribe requested to participate.

MARTA met with SHPO and FTA on October 20, 2023 to discuss mitigation options for the adverse effect to Five Points. This was followed up with a meeting with representatives from consulting parties to present and discuss potential mitigation measures. The following consulting parties met on October 25, 2023:

- Georgia Trust for Historic Preservation
- City of Atlanta Urban Design Commission
- Central Atlanta Progress/Atlanta Downtown Improvement District
- Preserve Atlanta
- Neighborhood Planning Unit – M
- Atlanta Downtown Neighborhood Association

The consulting parties provided input on the mitigation measures which were incorporated into the Memorandum of Agreement to be signed by FTA, SHPO and MARTA (January 9, 2024).

Appendix A: Comment Database

The following tables list the comments received through the website, by email and at the open house. Website comments were assigned a comment type to direct comments to the appropriate parties to provide a response. Comment types include concerns, general statements, questions and positive feedback. All the comments were categorized by topics to be addressed. The topics have a summarized response in Section 3 of this document. Topics addressed are: Accessibility/Connectivity, Amenities, Sustainability, Value, Safety, Service, Development, Historic Preservation, Unhoused Populations, Alternatives, and Concourse and Plaza Construction Closure. A response is provided for each comment.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
Figure 17 is missing, instead a second copy of Figure 16 is in its place. This important because a large homeless camp exists along the MARTA and CSX tracks east of the location. The entrance to this camp is on Wall Street, just east of the Peachtree St exit from the station. This is an inhabited area where people sleep and noise levels need to be controlled. Furthermore, there is a current construction impact in that all stairways from Concourse Level to the Eastbound platform were closed on Nov. 30. Passengers seeking to exit the facility were told to take the single, small elevator that serves people with handicaps on the concourse and both platform levels.	Concerns	Accessibility Unhoused	This has been corrected and updated online.
Any station improvements that do not include platform screen doors is a waste of taxpayer funds.	General Statements	Safety	Thank you for your comment. This suggestion has been shared with the station rehabilitation design team.
More security, more street cars. Well extend the street cars	General Statements	Safety Service	Safety is important to MARTA. MARTA police will maintain their presence at the station during construction and will continue to have a precinct in the vicinity of the station post construction. Thank you for the comment on streetcars, this has been shared with the MARTA planning team.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
The environmental assessment contains an “environmental justice” section. However this section does not mention inclusion of affordable housing, or retail/office space benefiting communities that have been marginalized. The Five Points renovation should include transit-oriented development directly above and next to the station that will benefit EJ communities. Creating another empty expensive plaza will do nothing to benefit these communities. As part of this process MARTA should partner with developers, Invest Atlanta, Downtown Atlanta Progress, and other relevant partners to create a dense residential development with units reserved for those making a low percentage of the area median income.	Concerns	Housing Environmental justice	Thank you for sharing your thoughts and concerns about the Five Points Transformation project. This project does not include housing or transit-oriented development. MARTA does collaborate with developers, Invest Atlanta, Central Atlanta Progress, and other partners to support transit-oriented development around our station sites.
While you present an exhaustive plan here, perhaps it is so detailed it is hard to follow. Rather than being focused on making the busses off the streets, the plan seems like one big TOD rally, not a transit plan. I would like to see a safe, dry, cool bus stop similar to the Decatur station than to have to continue to be on the street where you are rained on, accosted and roasting without any place to sit and be safe.	Concerns	Safety	Thank you for your comment and your suggestion for covered areas at the bus stops. This has been shared with the design team.
I look forward to many sustainability principles being applied to this once in a lifetime opportunity to transform this space. The potential is huge and the concepts presented have the right bones. It would be great to be a shining example on many facets of sustainability, including workforce development as well as the traditional environmental aspects. A lot of open space is being created, made for programming. Who is going to own the responsibility of doing that programming?	Questions	Sustainability Programming	Thank you for your comments on sustainability. We have passed them along to the design team. MARTA is working with the design team to incorporate sustainability principles into the design. With regard to the programming, as this is MARTA property, MARTA will be leading those efforts. Programming may be provided by others with permit approval by MARTA. We anticipate partnering with neighboring properties, community stakeholders and the City of Atlanta on the type of programming to be included on site.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
The new design looks generic. Nobody likes this. There has to be a better way to redesign the station without stripping away all the original design elements.	Concerns	Historic Structure	Thank you for your feedback. While the new design concept may not align with everyone’s preferences, we continue to engage to understand community desires. As part of the mitigation for removing the existing canopy, the new station will feature a display detailing the history of the station as well as documenting the current design.
I don’t understand why we can’t reconnect Broad Street – which was the original impetus for this study. The amount of money for this study to just refresh the station is not in the best interest of the Atlanta and particularly South Downtown. Re-establishing the street grid is the only choice to improve economic vitality around the station, improve access for all, encourage resiliency and sustainability. I’m disappointed that this concept wasn’t pushed further into what can benefit the entire community instead we are again focusing on the site as this gem in the system – which is what got us here in the first place. We can’t keep doing the same thing and expect different results.	Concerns	Sustainability Connectivity Value	Thank you for your comments with respect to the local community around the station. The reconnection of Broad Street was among the alternatives considered. All alternatives were evaluated against the project objectives. Ultimately, the alternatives that utilized a reconnected Broad Street were eliminated for technical reasons.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
I read through the Assessment and now I understand why MARTA wants to spend \$250 million: the canopy was poorly designed and will eventually fall down and kill us all if it is not fixed or removed. I appreciate that MARTA is concerned for the safety of those of us who use the station and ride the trains. But why does the homepage for the project make no mention at all of the structural danger? The project doesn't really make sense without understanding the structural problems, and it does not make me feel safer when MARTA is not up-front about structural issues. https://www.fivepointstransformation.com/home. It is a terrible idea to create public spaces at the station that are open to the non-riding public. Is there a plan to make sure that the new public space does not resemble what nearby Woodruff Park has become? There was yet another shooting in Woodruff Park recently. It would be *much* safer to have a tall fence around the entire property, with only paying customers allowed into the site.	Questions	Safety	We appreciate your feedback and safety is a primary purpose for completing this project. There is not an imminent danger at Five Points Station, but MARTA is taking the steps to replace the structure and modernize the station before it becomes a critical issue. We will continue to partner with our local jurisdictions and community organizations to improve conditions for our customers and those needing housing.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
The bus bays need to be moved under the station in the gulch with a new direct access to the station from the new bus bay location. Buses can access the new location heading west on MLK Jr. Drive and enter the gulch near the MLK Federal Building. The streets around the station should be for pedestrians only.	Concerns	Accessibility Service	A below-grade bus terminal was among the alternatives considered. All alternatives were evaluated against the project objectives. Ultimately, this alternative was eliminated for budget and technical reasons.
The proposed plans look AMAZING! This will make the Five Points Station so much brighter. Downtown, MARTA and riders deserve this update to the station that is central to our train system and city. THANK YOU to all who are working on this. I can't wait to see it realized.	Positive Feedback	Design Support	Thank you for your comment.
We must take care of the homeless people and encampments in and around "the heart" of Atlanta. More people will not live in ATL DTN - visit ATL DTN - until this issue is addressed and these unhoused residents have other options. There was an excellent article in the 12/1/23 WSJ, "Reno Halves Homeless Living on Its Streets". Please read and get with the mayor and other city and state stakeholders. This is a piece of the puzzle and we must make it fit into the future (success) of downtown Atlanta.	Concerns	Unhoused	The conditions that lead to both temporary and chronic homelessness in Atlanta are systemic regional and national issues. MARTA is committed to outreach through its HOPE program that uses trained social workers to connect those who need it with services and shelter opportunities. We enforce the MARTA Code of Conduct to ensure a safe and comfortable experience for all our customers. Our Transit-Oriented Development program is building new affordable housing at our stations. We will continue to partner with our local jurisdictions and community organizations to improve conditions for our customers and those needing housing.
I don't understand the idea for the plaza here. Why have a nothing space on top of what is supposed to be the busiest station in the whole system? This is an excellent opportunity to build for the density that is needed to truly activate this space. It takes more than programming to make it happen. That's not to mention: higher density is a more efficient use of infrastructure, thereby improving the environmental footprint.	Questions	Development	The current plan does not include housing or transit-oriented development on the station property. MARTA does collaborate with developers, Invest Atlanta, Central Atlanta Progress, and other partners to support transit oriented development around our rail station sites.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
I am encouraged to see a through and well designed assessment. The proposed design effectively addresses complaints and problem areas I have noticed in the Five Points station, as well as others I was unaware of, such as structural defects. I believe the assessment lays out a reasonable and effective solution to an aging station.	Positive Feedback	Design Support	Thank you for your comment.
Five points is one of the greatest stations I've been to and one of the busiest as well with many passing through. I do hope with the development of the new station there will be additional restroom space. But I can't wait to see the finished project	General Statements	Design Support Amenities	Thank you for your comment.
Truthfully, I can't give you a comment in regard to the Environmental Assessment because you have provided no information about what an Environmental Assessment entails, what information you are looking for, and just a general explainer of what an Environmental Assessment is.	General Statements		Thank you for expressing your concern. An Environmental Assessment is a document that is required when federal funding is used to support public projects. It involves the identification and evaluation of potential effects on the surrounding environment, including but not limited to air and water quality, noise levels, wildlife, and community well-being. You can reference more information on the environmental review process at FTA's website at https://www.transit.dot.gov/regulations-and-programs/environmental-policy-and-programs/environmental-review-process
Need covered canopies from the train to the bus. Lots of thunderstorms in Atlanta!	General Statements	Amenities	Thank you for your comment. This suggestion for covered areas at the bus stops has been shared with the design team.
I am very well-pleased with the lack of negative environmental impact of this project.	Positive Feedback	Support	Thank you for your comment.
An enviornmental study on a useless project seems like an unnecessary waste of money.	General Statements	Value	Thank you for your comment.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
This is much needed. I am deeply saddened you all require users to "sign in" to be able to submit feedback!!! DO BETTER	Concerns	Communication	Thank you for your comment.
I think it's wonderful. There's lots of green space and it's more open and inviting than the current station. I think people will really like it and the new style trains will really set it off.	Positive Feedback	Design Support	Thank you for your comment.
Please add elevators to connect the north bound platform to the east bound platform and the southbound platform to westbound platform. Currently bikes and wheel chairs have to go to the street level 3 to access the elevators. Please change the monitors at the northbound platform escalators to show eastbound trains and westbound trains schedule. Please do the same on the southbound platform.	Concerns	Amenities	Thank you for your comment, your recommendation has been shared with the station rehabilitation design team.
Please plan on connecting this to passenger rail. Don't screw it up to where Atlanta cannot once more become the passenger rail center of the Southeast. That would be sooooo shortsighted!	Concerns	Connectivity	Thank you for your comment.
I would like to see less anti-homeless architecture (railed benches, etc.) in the next iteration of Five Points. If the homeless population in Atlanta is a problem, give the unhoused a home. Anti-homeless benches are less comfortable, and don't look as good. Also, I tripped and fell yesterday at the Lindbergh Center station steps because the cleaning solution on the stairs is way too slippery. There were no wet floor signs in sight. The stations don't need be to be deep cleaned nearly as often as they are. When they are cleaned, put out hazard signs and dry up wet surfaces.	General Statements	Unhoused	Thank you for your comment.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
MARTA needs more extensive and more reliable service before spending \$200-plus million to overhaul Five Points. Surely you can improve drainage, lighting and ventilation for less -- and without spending money from the More MARTA program, which should be for expanding the system.	Concerns	Value	Improvements to the Five Points Station have been identified as a long-standing need, and because of the extent of the improvements needed at this station, MARTA is taking the opportunity to invest in a more comprehensive renovation of the station to provide a long term benefit rather than a short term repair. The transformation project is funded with several sources of funds including More MARTA Atlanta, MARTA local funds, federal funds and state funds. The upfront capital cost provides long term benefits in reduced operations and maintenance cost with the proposed station design.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
I'm not sure if it's part of the environmental assessment but I think it's very important to find a way to keep the station open to walk-up riders during the transformation process. This is the primary connection for many people in the area to our transit system and having to shift to another location will cause more time spent/lost in the travel process.	General Statements	Accessibility	MARTA's decision to close street access is based on prioritizing the safety of our customers, neighbors, and our construction teams, first and foremost. The design of station's canopy, consisting of prestressed precast concrete slabs and post-tensioned precast concrete beams, poses challenges to keeping street level access during demolition. Our careful demolition process, following a specific order, is crucial for safely removing the structure and involves construction activity throughout the entire station footprint. These plans impacts are detailed in Sec. 2.3.2.2 titled CONSTRUCTION IMPACTS: "During construction existing bus service will need to be temporarily relocated to neighboring stations while the plaza level of Five Points Station is closed. Modifications to bus routes and service changes will be planned prior to closure. Routes that terminate at Five Points Station will be routed to other rail stations including Georgia State, King Memorial and Civic Center. The MARTA service planning team will prepare a temporary service plan for each route and assess each station's ability to accommodate the temporary changes. The temporary service plans will be provided to the public prior to the changes occurring. Standard procedures for informing the public on bus route changes will be followed. Notifications on service changes will be made at least 30 days prior to changes and published with station information signs, at bus stops serving the impacted routes, and through MARTA communication channels including the web site and social media."

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
A great first step and the move in the right direction. Im in support of Transit Oriented Development and Equity Transit Oriented Development respectively.	Positive Feedback	Development Support	The current plan does not include housing or transit-oriented development. MARTA does collaborate with developers, Invest Atlanta, Central Atlanta Progress, and other partners to support transit oriented development around our rail station sites.
The existing physical plant is likely to be bad for the environment and any changes will likely improve the overall relationship between environment and Five Points. I am confident that the findings of the EA will be true representations of how the project will effect the area. As long as the report is friendly, I will not be concerned.	General Statements		Thank you for your comment.
This design is functionally not much different from the status quo. Instead, I want to see new vertical development above the station. A subway station should not exclusively occupy land above ground. That's the whole point of a subway. This design is a waste of space. Perhaps the effect of this should be considered in the environmental review. I know it should have been considered earlier in the process, but I apparently missed opportunities to comment earlier so I want to make this opinion known now. Thank you!	Concerns	Value	The current plan does not include housing or transit-oriented development. MARTA does collaborate with developers, Invest Atlanta, Central Atlanta Progress, and other partners to support transit oriented development around our rail station sites.
Yes I want look beautiful at five point and look nice I want bathroom neat and walk better inside and outside look neat nice people pay gate and nice train away homeless people need playground soccer people can see and need redevelopment store and marta	General Statements	Design Support Amenities	The current plan does not include housing or transit-oriented development. MARTA does collaborate with developers, Invest Atlanta, Central Atlanta Progress, and other partners to support transit oriented development around our rail station sites. Thank you for your comments on amenities at the station, this comment has been shared with the design team.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
It does not take into consideration the cultural significance of the existing structure. Smaller interventions are not proposed as an option, we are presented with a false "all or nothing" choice.	Concerns	Historic Structure	A repair alternative was considered as a part of the analysis and discussed in Chapter 14 of the Environmental Assessment. It was determined that the repair options would not support the purpose and need of the project.
I'm here for it. Looks outstanding to me!!!		Support	Thank you for the comment.
The best way you can help the environment is by improving service. Increase reliability, increase frequency, and expand. Is it the environment you are concerned with, or a shiny new thing with a ribbon cutting ceremony?	Concerns	Service Value	Thank you for the comment.
I'm definitely all for change. YES!!	Positive Feedback	Support	Thank you for the comment.
I do not understand how rail traffic and transfers can be maintained without a way to exit from the platform level to street level in case of an emergency. It is my opinion that MARTA must develop a clear emergency procedure to address this concern during the concourse level closure (assuming this has yet to be done).	Concerns	Accessibility Closure	MARTA is required to meet safety and security standards and regulations in the FTA's Public Transportation Agency Safety Plan (49 CFR Part 673) and National Public Transportation Plan. The Contractor is required to follow MARTA's SAQ-PL-1006: Safety & Security Certification Program Plan for in depth details along with SAQ-FO-5001C: Safety and Security Certification Required Documentation Form. The Site-Specific Safety Plan will include at a minimum: Site Security Plan and Site Safety Plan. This plan will include emergency situations and is discussed in Section 11: Safety and Security in the EA.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
I appreciate the effort and detail put into the review. However, it was certainly written with this plan—and this plan only—in mind. Black and white. Not necessarily a review of multiple options. I do appreciate safety is paramount in the review, but also that other factors should be considered.	Concerns		A repair alternative was considered as a part of the analysis and discussed in Chapter 14 of the Environmental Assessment. It was determined that the repair options would not support the purpose and need of the project.
There are many benefits to the new station canopy, plaza and renovation of the station. I think it is a loss that a historic structure is demolished and that renovation is not considered, only a build or no-build alternative. The renderings are limited to what is happening above ground so we can't see if the brutalist heritage below grade will be repaired and restored. There is some great architecture at 5 Points and it suffers from neglect. For the plaza design it seems an opportunity to create life through installation of things people want and need: kiosks, retail spaces, cafe/restaurant spaces and for performance and temporary (such as farmer's market) retail has been overlooked and what we are getting is a new, fresh, but vacuous space that is a corridor not a place for people to "be" and to dwell while engaging in a multiplicity of activities. That is sad. What's been wrong with 5 Points MARTA station before has been the absence of things that make public places a magnet for all kinds of people and for a place that is fitting for the center of the city. That is not changing. Outside the south and west facades, the bus bays will mean that we have a bus barrier to experiencing 5 points- no creativity and a hostile exposure to pedestrians. This could have been expanded relocated opposite Forsyth St. and made the station beautiful on all four	Concerns	Amenities Accessibility Historic Structure	A repair alternative was considered as a part of the analysis and discussed in Chapter 14 of the Environmental Assessment. It was determined that the repair options would not support the purpose and need of the project.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
sides. Bad design choice to make buses more important than people.			

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
Put a food, clothes, and hygiene pantry, hot meals, INSTANT power bill assistance sign ups for long term assistance, permanent housing placement center, and a whole mall of healthcare services like mercy care along with FREE transportation tickets, free training classes like self defense, a child care center, free haircuts, upward mobility mall with tools for upward mobility like no interview, cash only job sign ups, free phone access, free skills trainings like hvac tech, etc., free tickets to community events, hiring AMERICAN CITIZENS ONLY, NO QUESTIONS ASKED, and make sure there's a pretty fountain in the middle with the '96 Olympics Izzy mascot coming out of the middle. Play calming jazz music and even feature bubble walls! Make a special stage just for buskers, a baby drop box, and a gun drop box. Order a chaplain. Open a free medical marijuana card issuing service and a dispensary. Have concerts and speeches there.	General Statements	Amenities	Thank you for suggesting community supportive activities. MARTA has partnerships with many community organizations and will share these suggestions through those programs.
Don't do this project (Five Point). You created plenty of concrete that will need pressure washing. Landscaping upkeep is also costly. Allocate more budget money for the pressure washing of all rail stations. This design has nothing to do with delivering better Marta services to the public.	Concerns	Service Value	Improvements to the Five Points Station have been identified as a long-standing need, and because of the extent of the improvements needed at this station, MARTA is taking the opportunity to invest in a more comprehensive renovation of the station to provide a long term benefit rather than a short term repair. The project is included in the More MARTA Atlanta funding and also has been identified as a need as part of the Station Rehabilitation program. The upfront capital cost provides long term benefits in reduced operations and maintenance cost with the proposed station design.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
5 points is fine as is. Sure it's a bit dirty but that's fine. The money would be better spent either A) expanding the transit network or B) increasing service intervals.	General Statements	Service Value	Improvements to the Five Points Station have been identified as a long standing need, and because of the extent of the improvements needed at this station, MARTA is taking the opportunity to invest in a more comprehensive renovation of the station to provide a long term benefit rather than a short term repair. The project is included in the More MARTA Atlanta funding and also has been identified as a need as part of the Station Rehabilitation program. The upfront capital cost provides long term benefits in reduced operations and maintenance cost with the proposed station design.
ExcellenceExcellence Project	Positive Feedback	Support	Thank you for the comment.
I would like to get more information on when this project start and how are they going to do at five point because I work downtown and I need to no how can u access the five point marta are they going to close off the entrance on how u come threw there	Concerns	Closure	The MARTA service planning team will prepare a temporary service plan for each route and assess each station's ability to accommodate the temporary changes. The temporary service plans will be provided to the public prior to the changes occurring. Standard procedures for informing the public on bus route changes will be followed. Notifications on service changes will be made at least 30 days prior to changes and published with station information signs, at bus stops serving the impacted routes, and through MARTA communication channels including the web site and social media."
The project doesn't appear to have a significant impact on the environment, as it is merely a renovation and reconstruction of the existing architecture. If it helps to increase ridership and protect the lower levels of the station from rain,	Positive Feedback	Support	Thank you for the comment.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
then it should have a long-term environmental benefit. I would support this project.			
As a local Downtown resident, the planned closure of Five Points will directly impact my ability to use rail lines. While I understand that the platforms will still be open, being forced to take rail to the station and transfer will create significant time penalties, particularly during single tracking and reduced weekend service periods. There has to be some way to maintain access to platforms from the street during demolition, even if a single route that changes with the progression of demolition work.	Concerns	Closure	The MARTA service planning team will prepare a temporary service plan for each route and assess each station's ability to accommodate the temporary changes. The temporary service plans will be provided to the public prior to the changes occurring. Standard procedures for informing the public on bus route changes will be followed. Notifications on service changes will be made at least 30 days prior to changes and published with station information signs, at bus stops serving the impacted routes, and through MARTA communication channels including the web site and social media.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
The overall design of the project is sufficient to address flood and leak risk from increasing rain events, and marginally opens up the above ground space to more activity. There is no proper discussion of how activity within the station will be improved through better design, wayfinding, or resign of the station. Nor is there discussion of how the inside of the station may be better activated through underground connections with nearby destinations (e.g., Atlanta Underground, apartments, etc.), spaces for retail or art, or community spaces. Appendix C does well to consider options to reroute buses and open Broad Street to traffic. MARTA should commit to reopening Broad Street to bus, bike, and pedestrian activity to better contribute to an urban form of a thriving Downtown Atlanta. This would open up more and better space for bus bays and operations, reduce turning movements, and allow more space for vertical developments and TOD on MARTA property. A Broad Street Plaza with an aesthetic canopy can still exist along with a transit and active-mode focused street. There should be additional consideration of more bus-only lanes, TSP, and camera enforcement (ideally bus-mounted cameras) against private drivers in bus-only lanes.	Concerns	Accessibility Alternatives	Thank you for your comments.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
Regarding Section 5 – Environmental JusticePlease conduct an EJ analysis of bus and rail riders that pass through Five Points Station. This population will be far more affected by construction activities and the final outcome of the project compared to just the limited residences in the study area. Data on the origin Census tracts/block of most bus and rail riders may be useful data for this, and the number of reduced-fare passes used per day to board buses and enter the rail station. Regarding section 13 – Indirect and Cumulative Impacts Work with City of Atlanta and the Atlanta Downtown Improvement District to combine timelines and construction work for the Peachtree Street and Forsyth Street projects. These could have significant benefits for pedestrians, bike riders, and bus operations if done properly. MARTA should endeavour to work with these partners to complete all projects simultaneously, share construction workforces and materials where possible, and limit the cascading public input schedules the public would otherwise endure.	Concerns	Environmental Justice	The framework for the EJ evaluation incorporated in this EA is based on FTA C4703.1, which outlines a methodology that addresses EO 12898. Impacts to riders is considered in Section 2: Transportation. Appendix C has a Bus Connections Memo that also assesses the riders impacted at Five Points Station.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
The businesses around the station, especially along the Broad Street North pedestrian plaza and the grocery store to the south at the intersection of Alabama St and Broad St are likely to be directly impacted by any transformation proposed. The idea to destroy the existing station canopy, make it more open and improve ventilation and circulation are not only beneficial to the station's safety and accessibility, but also to the footfall these businesses could experience. A section dedicated to immediate community input from the business owners / patrons could be beneficial. The character of the station is determined by the frequent users of these stores, who also tend to use the station premises and facilities most often. I recognize that it could be out of MARTA's purview to determine which businesses stay and which would be gentrified, but there will be an immediate impact that they face once the station is done.	Concerns	Accessibility	Thank you for your comment. MARTA will continue to have public engagement through construction phase of the project, including specific engagement with business owners.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
I am extremely concerned about negative impacts on CURRENT user experience due to significant disruptions in normal service during the stated 18-month construction period. I strongly encourage MARTA and their contractors to consider how to mitigate negative impacts more effectively. This seems to be only minimally addressed in the current EA. My past experience with even minor MARTA service disruptions has been abysmal - signs that are incorrect; unhelpful staff, if they're present at all; unclear alternatives; poor communication about closures; the list goes on - and gives me no confidence that they are up to the task of such a major - and long term - disruption to daily service and way-finding. I fear the payoff of a more attractive and safe station without any significant improvement to rail or bus service is not worth the hellish experience current customers have already begun to endure at 5 Points. I for one, will be overhauling my daily commute strategy to avoid MARTA for trips downtown because of this project - and may not return upon completion. I'm fortunate to have this choice. Many do not, and I feel the current scheme unjustly burdens means-limited MARTA users who do not have viable alternatives. I fear this project will be the death knell for a Downtown area that already struggles to attract people to the core of our region. One idea: What would it look like to make MARTA free to ride during this period as a sign of good faith?	Concerns	Closure	We recognize that this temporary change will require an extensive outreach effort that goes above and beyond our normal efforts. We are confident that we will be able to reach the most directly affected customers through aggressive in-person canvassing on the impacted routes and outside of the Five Points fare gates. We estimate that these customers comprise about 30% of the total number of daily users at Five Points. This campaign will include a wide range of tactics - including staff training, MARTA ambassador teams, extensive signage and wayfinding, texting and robo call campaigns, paid media advertising and digital media outreach across all platforms.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
Design looks good. Please don't forget the plan about renovating the restrooms, Police Precinct, and eradication of the rodent problem.	General Statements	Design	Thank you for the comment.
I think we need to to scale down the size of the entrance as it feels to large and not intimate enough to support residential and other non-corporate businesses. It would help people feel safe. It's visually appealing but I want it to last into the future for growth.	General Statements	Design	Thank you for the comment.
Please consider adding more development on top of the station. We need affordable housing in this city. Housing on top of stations will boost ridership.	General Statements	Development	The current plan does not include housing or transit-oriented development. MARTA does collaborate with developers, Invest Atlanta, Central Atlanta Progress, and other partners to support transit-oriented development around our rail station sites. Thank you for your comments on amenities at the station, this comment has been shared with the design team.

Five Points Station NEPA Comments - Comments received via website			
Comments	Comment Type	Topic	Response
I believe MARTA needs to reassess their current plan that will restrict all street access from Five Points MARTA station. If they could keep an entrance open for daily riders during the construction process or improve safety issues at Garnett station that would be much appreciated to both riders and residents in the neighborhood.	Concerns	Closure	The MARTA service planning team will prepare a temporary service plan for each route and assess each station's ability to accommodate the temporary changes. The temporary service plans will be provided to the public prior to the changes occurring. Standard procedures for informing the public on bus route changes will be followed. Notifications on service changes will be made at least 30 days prior to changes and published with station information signs, at bus stops serving the impacted routes, and through MARTA communication channels including the web site and social media.
The project will have significant environmental impact by removing a large portion of the historically-significant canopy structure while not restoring the previous historic condition of an open-air Broad Street traversing the site north-south. Additionally, closing off the station to pedestrian access for 18 months will have significant impact on the nearly 16,000 people per day who arrive/depart the station on foot or by bus.	Concerns	Closure Historic Structure	The MARTA service planning team will prepare a temporary service plan for each route and assess each station's ability to accommodate the temporary changes. The temporary service plans will be provided to the public prior to the changes occurring. Standard procedures for informing the public on bus route changes will be followed. Notifications on service changes will be made at least 30 days prior to changes and published with station information signs, at bus stops serving the impacted routes, and through MARTA communication channels including the web site and social media. A repair alternative was considered as a part of the analysis in lieu of the demolition of the canopy and discussed in Chapter 14 of the Environmental Assessment. It was determined that the repair options would not support the purpose and need of the project.

Five Points Station NEPA Comments - Comments received via email			
Comments	Comment Type	Topic	Response
Very excited to see progress MARTA is making but very disappointed by the design proposed. Please consider that MARTA is an underground subway in this area. There is no need for an enormous surface level concrete park. Please consider using that money in ways that will actually expand or improve service, and minimize the surface level build (or better yet, allow housing to be built above the station)	General Statements	Development Support	The current plan does not include housing or transit-oriented development. MARTA does collaborate with developers, Invest Atlanta, Central Atlanta Progress, and other partners to support transit oriented development around our rail station sites. Thank you for your comments on amenities at the station, this comment has been shared with the design team.
It looks lovely from the AI drawings.	Positive Feedback	Design Support	Thank you for your comment.

Five Points Station NEPA Comments - Comments received via email			
Comments	Comment Type	Topic	Response
Hello I am a native of Atlanta and i approve improvements to 5 points station. It would be great if you add a few farmers market stands for Georgia grown produce and foods. I do appreciate the community garden and other lovely and healthy aesthetics. Thank you	General Statements	Design Support	Thank you for your comment.

Five Points Station NEPA Comments - Comments received via email			
Comments	Comment Type	Topic	Response
Hello Five Points Transformation team, I am an Atlanta resident and MARTA rider who lives near the East Lake MARTA station. Upon reviewing the Five Points Transformation Environmental Impact report, I must ask why the much-needed renovation of this important station feels like an afterthought. While the improvements listed in the report are necessary, the long-neglected station — an important stop for anyone changing lines or traveling to the Atlanta airport — is a ripe opportunity for multi-use development. This site has the potential to be a transformative step in Atlanta’s growth and transition into a truly world-class city. As any resident of (or visitor to) metro Atlanta could tell you, the number one issue affecting quality of life in this city is traffic and sprawl. So why is our most important MARTA station being left off of the table for more extensive development and community engagement opportunities? The East Lake Station plan, with StationSoccer, affordable housing, and an upcoming commercial center that is convenient to neighborhood residents and MARTA riders alike, should be a jumping off point to what could be possible in the Five Points “Grand Central Station” of Atlanta's heavy rail transit system. Vertical development that includes affordable housing and offices, street-level retail spaces that are affordable for local business owners, and public gathering places will help the area become more vibrant, attracting residents and visitors to locally owned businesses in the quickly developing area between the Gulch and Underground Atlanta. Like the Beltline, we could harness the walkability and central location Five Points station to add value to surrounding real estate and create a new urban center of the city that caters to transit riders and residents. Creating a safe space for local businesses to grow, local artists to create, and local residents to live could jumpstart a boom in private development that outpaces the public investment in the station itself to provide value beyond a simple station renovation. Wasting this opportunity and moving forward with a plan that only resets the status quo for the Five Points station will set Atlanta transit back in the decades to come. Creating a destination at our most important heavy rail hub will reinvigorate downtown, encourage MARTA ridership, and create new opportunities for Atlanta to thrive.	Concerns	Development Support	Thank you for your comments. The current plan does not include housing or transit-oriented development. MARTA does collaborate with developers, Invest Atlanta, Central Atlanta Progress, and other partners to support transit-oriented development around our rail station sites. Thank you for your comments on amenities at the station, this comment has been shared with the design team.

Five Points Station NEPA Comments - Comments received via email			
Comments	Comment Type	Topic	Response
Thank you,			

Five Points Station NEPA Comments - Comments received via email			
Comments	Comment Type	Topic	Response
Hi there, I use MARTA to commute from Avondale Estates to Midtown 1-2x per week. So every time, I pass through Five Points while switching train lines. Here are my thoughts on the current station from my perspective: Navigating Five Points is far too difficult. The layout of the station is confusing for anyone who does not use it regularly. I know this from traveling with others who do not use it as much. There are two issues I see that make it confusing: the layout of the station and the lack of clear signage. The layout of the station is what it is to some degree, but the redesign of the station should use this chance to understand what paths users follow through the station and use elements such as walls, railings, and floors to make it easy for people to understand where they are and where they're going. This is something some airports are very good at, and MARTA should look to that style of design. Regarding the signage, this is both referring to the fixed/static signs and the TV's. Both are hard to read and there are not nearly enough in key visual areas. For example, it is 50/50 at best I can see and read the TV's while standing waiting for a train. At the same time, the signs are small, dirty, and almost impossible to read from a train (this is the case system-wide). A complete revamp of signage, utilizing much larger and brighter digital displays along with clearly signposting for users navigating the station and the train lines, would be immensely valuable. Lastly, as someone who switches trains regularly, Five Points should be the hub of the system. Train schedules do not necessarily work for this currently - it would not be difficult to set up trains so that north/south and east/west lines are synced to make for less than 5 minute waits (vs 12 to 15 min at times). Related to this - why on earth does the north-south lines suffer constant delays? MARTA's biggest operational shortcoming is its inability to run its trains on time.	Concerns	Amenities Service Accessibility	Thank you for your comments. The project purpose and need includes improving site access and making more seamless connections across the site. The need for better access is discussed in Section 1.2.1 Enhance Site Access and Safety in the EA. The alternatives were compared based on their ability to achieve this objective. Additional comments on access preferences and requests for improved site signing and wayfinding have been passed to the design team for inclusion in the final design process. The purpose of this project is to renovate the station and does not make changes to service. MARTA regularly reviews service plans and makes updates as warranted. These comments on both bus and rail service have been shared with MARTA's service planning team

Five Points Station NEPA Comments - Comments received via email			
Comments	Comment Type	Topic	Response
To whom it may concern: As a Five Points Station stakeholder, I have reviewed the public assessment. While I agree that the current station is a hot mess (to be polite) and the new station is necessary, I have a small concern about the build being farmed out to the lowest bidder with the worst quality. Please choose a firm that is noted for quality work, not just cheap work. I also want to be clear that access to the station for people who use mobility devices should not be limited to elevators or other mechanical operations that can break down. The transition from the street to the ticket plaza should include correctly graded ramps so that members of our community who use wheeled mobility devices can access the ticket plaza without relying on an elevator or similar that may or may not be in-service. Thank you!	Concerns	Accessibility	The project purpose and need includes improving site access and making more seamless connections across the site. The need for better access is discussed in <i>Section 1.2.1 Enhance Site Access and Safety</i> in the EA. The alternatives were compared based on their ability to achieve this objective. Additional comments on access preferences and requests for improved site signing and wayfinding have been passed to the design team for inclusion in the final design process

Five Points Station NEPA Comments - Comments received and Public Open House		
Comments	Topic	Response
Can't wait for the station improvements. Thanks for being here.	Design Support	Thank you for your comments.

Five Points Station NEPA Comments - Comments received and Public Open House		
Comments	Topic	Response
Yes it would be nice but what would it benefit the tax payers and MARTA Rider	Value	Improvements to the Five Points Station have been identified as a long-standing need, and because of the extent of the improvements needed at this station, MARTA is taking the opportunity to invest in a more comprehensive renovation of the station to provide a long- term benefit rather than a short- term repair. The upfront capital cost provides long term benefits in reduced operations and maintenance costs from the redesign of the station. Maintenance of the existing station is costly and the overall life span is unknown. For these reasons, the renovation is more cost effective and will provide ease of maintenance in future years.

Five Points Station NEPA Comments - Comments received and Public Open House		
Comments	Topic	Response
I think it is very innovative and I like it.	Design Support	Thank you for your comment.
Great idea to let more light and air into the station. It would be great to include more color whether in the form of flowers, art, paint, etc.	Design Support	Thank you for your comments. We will pass along your suggestions to the design team.
Pienso que una corona oportunidad para mostrar al mundo lo que Atlanta tiene que ofrecer al mundo una gran oportunidad para user el sentro un lugar mas economico. [Translation by Google Translate: I think it's a great opportunity to show the world what Atlanta has to offer the world, a great opportunity to make the downtown a more affordable place.]	Design Support	Thank you for your comment.
I think that this project is long overdue. Looking forward to the changes it brings and this its great for the environment.	Design Support	Thank you for your comment.
I feel the transformation has and awful reconstruct due to weather conditions. The reson why I thought it was a bad idea was due to the construction of the station open to the elements which doesn't protect people, meaning the disabled, kids and elderly (slip and falls.) The open constuct can become slipper during cold and wet seasons which will be dangerous for your customers. I hope you use non-slip rubber for the most common areas which have steps or inside elevators. You can use recycled tires (just a suggestion).	Accessibility Safety	Thank you for your comment.

Five Points Station NEPA Comments - Comments received and Public Open House		
Comments	Topic	Response
Its unsafe, rats infestation its pissy all code of conduct violation - I feel like the Marta is a start to clean the areas stations and that includes downtown. This idea is beneficial.	Safety	Thank you for your comments.
I feel like this a very good for the environment to clenod up for the marta. This is going to be good for the downtown area.	Support	Thank you for your comments.
Cleaning up the area is going to be good for the marta. The environment need to be clenod up down and I can't wait to see the new platform.	Safety	Thank you for your comments.
It looks wonderfull and much cleaner. :)	Support	Thank you for your comments.

Five Points Station NEPA Comments - Comments received and Public Open House		
Comments	Topic	Response
Only major concern personally from an environmental perspective is that this project does not to any extent start sacrificing public well-being or future aesthetic value to benefit corporate <<illegible>> please make sure to work with any unhoused individuals on the area and provide them plenty of <<illegible>> to make alternative transportation plans - some signs for the general public. Design looks great. (And please modernize your app :())	Unhoused Design Support	Thank you for your comments. The conditions that lead to both temporary and chronic homelessness in Atlanta are systemic regional and national issues. MARTA is committed to outreach through its HOPE program that uses trained social workers to connect those who need it with services and shelter opportunities. We enforce the MARTA Code of Conduct to ensure a safe and comfortable experience for all our customers. Our Transit-Oriented Development program is building new affordable housing at our stations. We will continue to partner with our local jurisdictions and community organizations to improve conditions for our customers and those needing housing.

Five Points Station NEPA Comments - Comments received and Public Open House		
Comments	Topic	Response
I think progress is important. Just don't leave the homeless out of the equation. This is the permanent upgrade you are undertaking. Please provide a permanent upgrade for all the homeless people who are impacted by this upgrade. P.S. The design is great	Unhoused Design Support	Thank you for your comments. The conditions that lead to both temporary and chronic homelessness in Atlanta are systemic regional and national issues. MARTA is committed to outreach through its HOPE program that uses trained social workers to connect those who need it with services and shelter opportunities. We enforce the MARTA Code of Conduct to ensure a safe and comfortable experience for all our customers. Our Transit-Oriented Development program is building new affordable housing at our stations. We will continue to partner with our local jurisdictions and community organizations to improve conditions for our customers and those needing housing.
I appreciate the concern to update the station, but I think more work needs to be done to assure the general public that this project is actually a priority and that there is a "need" for it. I believe most riders would prefer to see routes extended.	Service Value	Improvements to the Five Points Station have been identified as a long-standing need, and because of the extent of the improvements needed at this station, MARTA is taking the opportunity to invest in a more comprehensive renovation of the station to provide a long term benefit rather than a short term repair.

Five Points Station NEPA Comments - Comments received and Public Open House		
Comments	Topic	Response
Been here all my life and the train system here sucks the train systems in other states I've been to were way better.	Service	Thank you for your comments.
I think the current station functions fine and that the funds spent on such a major remodel could go much farther increasing bus and train frequency. If the project is already happening, I'd like to see: - minimal use of concrete/impervious, more pervious walking area and timber and brick. - reused construction materials. - no turf/native plant plantings. - prioritize integration with street. - less brutalist/more historical style architecture. - LEED	Service Value Sustainability	Thank you for your comments.
I would like to say that there is always still great people in the world and transportation is a must out here and yes modifying access to improve is a must	Accessibility	Thank you for your comments.
I would like to see more increase in lighting and air circulation. Handicap accessibility with a more modernized structure.	Accessibility Safety	Thank you for your comments.
I think its great	Design Support	Thank you for your comments.
I like the idea. It will look very nice once it is finished. Well planned and love the history behind it.	Design Support	Thank you for your comments.
I like marta it helps me get to and from work if not for them I would have no job		Thank you for your comment.
I believe that the new Five Points Transformation should've had a "historical" appearance with restaurants and shops on the inside and I'm not talking about Marta Market.	Design	Thank you for your comments.
Everything		Thank you for your comment.
I think the changes expected to be made well be both environmental and culturally successful and needed all throughout Atlanta.	Design Support	Thank you for your comment.

Five Points Station NEPA Comments - Comments received and Public Open House		
Comments	Topic	Response
An open environment would allow more natural airflow. Adding trees will benefit the quality of air. The timing of construction will also be a benefit in not disturbing the traffic to much. Revamping a staple to ATL is also important. Also, can attract tourist which is good for the local economy.	Support	Thank you for your comments.
Downtown marta was very clean; changes in service is fast; Prepare and Eis	Service	Thank you for your comments.
I love marta how everything gon chang in the further and help with grow and development It a great thing for everybody ampact for the further and beyond	Support	Thank you for your comments.
Improve information about how to ride, like the bus routes	Accessibility	The project purpose and need includes improving site access and making more seamless connections across the site. The need for better access is discussed in Section 1.2.1 Enhance Site Access and Safety in the EA. The alternatives were compared based on their ability to achieve this objective. Additional comments on access preferences and requests for improved site signing and wayfinding have been passed to the design team for inclusion in the final design process.
I love MARTA how they change things...		Thank you for your comment.
It's a beautiful project and commendable	Support	Thank you for your comment.
How can this also be used for functions. The space can be fun corporate functions. By but is like making history		Thank you for your comment.

Five Points Station NEPA Comments - Comments received and Public Open House		
Comments	Topic	Response
I like the idea of it all I rid marta n I think it is exlent		Thank you for your comment.
I feel that this will help the environment. I feel like this will bring a clean and better towards the community		Thank you for your comment.
I think it is a good idea to save energy.	Sustainability	Thank you for your comment.
I think that needs to be more police officers on the train, I also think that the homeless is the biggest problem you have in Atlanta people are afraid to come to events and get off at five points without being rob and shot as I think more need to be done to make these events successful and safe.	Safety	Thank you for your comment. The conditions that lead to both temporary and chronic homelessness in Atlanta are systemic regional and national issues. MARTA is committed to outreach through its HOPE program that uses trained social workers to connect those who need it with services and shelter opportunities. We enforce the MARTA Code of Conduct to ensure a safe and comfortable experience for all our customers. Our Transit-Oriented Development program is building new affordable housing at our stations. We will continue to partner with our local jurisdictions and community organizations to improve conditions for our customers and those needing housing.
I think it's a good idea the transformations will be well needed and overdue	Design Support	Thank you for your comment.
Plaza level light stop the volitsa Marta are very train station	Safety	Thank you for your comment.

Five Points Station NEPA Comments - Comments received and Public Open House		
Comments	Topic	Response
Adding retail fast food vendors (ex chick fil a, subway, McDonalds etc.) on station property	Amenities	Thank you for your comment.
Yes five points need to be remodel due to five points history. It would be great to see five points look better and feel safer like back in the days	Safety	Thank you for your comment.
I, my very happy to see MARTA move forward with the new construction. Very Good.	Support	Thank you for your comment.
I like the idea and love that it is being renovated. I think it is well thought out and will look amazing once it is done.	Design Support	Thank you for your comments.
Hello, I like the added greenspace, however it feels in the end that this project is a nice-to-have rather than a must-have. Signage and wayfinding in the renderings is lacking and must be significantly increased. It is currently not very obvious to find out where things are, which train to take to reach a particular station, let alone finding a particular bus, building or landmark mean the station while inside the station. Thank you.	Accessibility	Thank you for your comments.
I would love to participate in everything please		Thank you for your comment.
I like the Peachtree Design	Design Support	Thank you for your comment.
Awesome work! Keep it up!	Design Support	Thank you for your comment.
Awesome Happy Holidays! To: MARTA From: Me		Thank you for your comment.

Appendix B: Comment Letters and Responses



January 5, 2024

VIA Email and Regular Mail

Collie Greenwood
MARTA General Manager / Chief Executive Officer
2424 Piedmont Road NE
Atlanta, GA 30324
publichearinginfo@itsmarta.com

Yvette Taylor
Region IV Administrator
Federal Transit Administration
230 Peachtree Street, NW, Suite 1400
Atlanta, GA 30303

RE: MARTA Five Points Station Transformation Project Environmental Assessment

Dear Mr. Greenwood and Ms. Taylor:

On behalf of the Natural Resources Defense Council and the Southern Environmental Law Center, we submit the following comments regarding the MARTA Five Points Station Transformation Project's ("the project") Environmental Assessment.

We recognize the vital role MARTA serves in metro Atlanta and the unique challenges it faces. MARTA's heavy rail network is nearly fifty years old and significant investment is required to ensure that it continues operating safely and effectively. We likewise appreciate the Five Points Station's challenging design and architecture, both in terms of the maintenance required and its impacts on rider experience. We have experienced firsthand the station's dripping rainwater, poor ventilation, and limited daylight. We do not question the need for the Five Points Station to be maintained, repaired, and improved. The questions for this project – questions that should be addressed through the Environmental Assessment ("the EA") – are how to best redesign the station to maximize the benefit for MARTA riders and how to do so within constrained fiscal resources. And, perhaps most importantly, how MARTA can engage the public in these important decisions.

It is important to emphasize the National Environmental Policy Act's ("NEPA") twin aims: requiring agencies to disclose the environmental impacts of their actions and ensuring that agencies meaningfully engage with the public in making these decisions.¹ As the Council on Environmental Quality recently explained:

¹ *Baltimore Gas & Elec. Co. v. Nat. Res. Def. Council, Inc.*, 462 U.S. 87, 97 (1983).

[NEPA] codifies the common-sense idea of “look before you leap” to guide agency decision making, particularly in complex and consequential areas, because conducting sound environmental analysis before agencies take actions reduces conflict and waste in the long run by avoiding unnecessary harm and uninformed decisions. It establishes a framework for agencies to ground decisions in sound science and recognizes that the public may have important ideas and information on how Federal actions can occur in a manner that reduces potential harms and enhances ecological, social, and economic well-being.²

Both for this project and for MARTA’s capital program more broadly, the NEPA process should not be dismissed as a mere bureaucratic hurdle to be cleared. Instead, MARTA should embrace it as a framework for evaluating its plans, engaging with its riders, and as a check to ensure that its proposed project best serves the public. This approach requires MARTA to carefully evaluate the full range of feasible alternatives and their comparative merits – both the pros and the cons. Approaching NEPA in this transparent fashion will result in better projects, deeper public understanding of MARTA’s decisions, and more durable support for these decisions going forward.

In this spirit, we submit the following comments and recommendations regarding the Five Points Station Transformation EA.

I. MARTA Must Fully Consider The Impacts Of Prohibiting Street Access To The Five Points Station During Construction, And Identify Ways To Minimize Those Impacts.

The EA should explain the impacts that will occur during the project’s construction phase more clearly and commit to mitigation measures to address these impacts.

The EA notes that the station’s plaza and concourse levels will be temporarily closed during construction, (EA at 17, 43), and that bus service will be relocated to neighboring stations. (EA at 22). The EA does not clarify that these closures will prevent all pedestrian ingress and egress from the station for the entire eighteen months of construction. Instead, this crucial explanation was revealed through media reports.³

The Five Points Station serves approximately 55,000 daily riders, with 29% either walking to or transferring from a bus at the station. (EA at 20). Thus, eliminating street access to the Five Points Station will impact approximately 16,000 riders every day. It may be possible to shift some of these trips to adjacent heavy rail stations (Garnett, GWCC, Peachtree Center, and GSU). But these stations are all approximately 0.5 miles from the Five Points Station and therefore near the outer bounds of the transit “walkshed” that riders are assumed to travel from a transit station.

² Council on Environmental Quality, *Notice of Proposed Rulemaking: National Environmental Policy Act Implementing Regulations Revisions Phase 2*, 88 Fed. Reg. 49924-01 (July 31, 2023).

³ *MARTA’s Five Points overhaul to close station for more than a year*,” Josh Green, Urbanize Atlanta (December 15, 2023) <https://atlanta.urbanize.city/post/marta-five-points-project-will-close-station-more-than-year>

The Five Points Station serves ten local bus routes with seven of those routes terminating at the station. (EA at 20). Additional commuter bus service operated by regional transit providers also runs in the immediate vicinity. Even if these bus riders do not transfer to the heavy rail system at the Five Points Station, the street closures around the station during construction will significantly impact their mobility and transit access in the area.

In short, closing street access to the station will make it difficult to access the Five Points area by transit for the duration of the construction period. In the context of NEPA, this is an adverse impact of the project and the EA fails to address this impact in several ways.

First, NEPA requires FTA/MARTA to consider the scope and scale of these impacts. Understanding a project's potential environmental impacts is NEPA's central purpose.⁴ Further, this information is the basis for determining the significance of a project's impacts and therefore whether an environmental impact statement is required.⁵ Yet the EA's discussion of the transportation impacts during construction (Section 2.3.2.2) only mentions that "bus routes and service changes will be planned prior to closure." (EA at 22). This incomplete and cursory discussion of a critical issue falls short of both the spirit and the letter of NEPA.

The EA does not quantify the number of riders that will be impacted by restricting street access to the station during the construction phase. Nor does it evaluate the number of destinations in the Five Points area that will be affected by reduced transit access or whether these destinations can be adequately served by other heavy rail stations. Understanding the scope and scale of mobility impacts is necessary to establish that the project's impacts are not significant, and this information is absent from the EA. Stated more directly, FTA/MARTA cannot justify a Finding of No Significant Impact without fully understanding the scope and scale of closing the Five Points Station to all street access for eighteen months.

Second, NEPA requires FTA/MARTA to consider whether there are reasonable alternatives that could minimize the project's impacts,⁶ and the EA falls short in this respect as well. The station currently has entrances on all sides of the plaza level. FTA/MARTA should explain why all of these entrances must be completely closed for the duration of construction, and why this outcome cannot be avoided by: (1) phasing demolition and construction to ensure that at least one entrance remains open at all times; (2) modifying the construction schedule to shorten the time period when all entrances are closed; or (3) "hardening" a temporary entrance to allow riders to safely enter the station through active construction. The EA must consider these alternatives or explain why they are technically or economically infeasible.⁷ Comparing the relative merits of different alternatives is the heart of NEPA, and this critical element is

⁴ NEPA's purpose is "to ensure [that] Federal agencies consider the environmental impacts of their actions in the decision-making process. 40 C.F.R. § 1500.1(a).

⁵ 40 C.F.R. § 1501.5(c)(1).

⁶ "Reasonable alternatives means a reasonable range of alternatives that are technically and economically feasible, and meet the purpose and need for the proposed action." 40 C.F.R. § 1508.1(z).

⁷ The EA contains a detailed discussion of the roof's current composition and the maintenance challenges it presents. (EA at 9 and Appx. A, B). But it fails to explain why these conditions prevent all ingress/egress from the station for the duration of the construction period.

essentially absent from the EA.

Third, NEPA requires FTA/MARTA to consider mitigation to reduce a project's detrimental effects.⁸ But the EA again misses the mark. The EA's discussion of mitigation for construction effects focuses primarily on reducing dust. (EA at Section 3.3.2.2). The only discussion of how mobility impacts will be mitigated is the suggestion that a temporary service plan for existing bus routes will be prepared and the ability of adjacent stations to accommodate temporary route changes will be assessed. (EA at 22). This is precisely the type of information that should have been prepared already and should have been disclosed to the public in the EA.

Further, there are additional mitigation strategies that should be evaluated such as increasing the frequency of streetcar service to improve transit access through the Five Points area and operating a temporary circulator bus route to fill any transit voids (particularly in South Downtown). NEPA requires clear identification and evaluation of mitigation strategies like these, but the EA lacks this information.

By failing to acknowledge the project's adverse impacts, failing to consider alternatives that could avoid them, and failing to consider potential mitigation, the EA falls well short of NEPA's standards and the analysis it requires.

II. MARTA Must Consider The Cumulative Impacts Of Construction Projects On Mobility In The Five Points Area.

Given its likely impact on mobility in the immediate vicinity, the EA must consider the synergistic impacts of the Five Points Transformation Project with other projects planned for the area.⁹ Table 7 of the EA lists a number of construction projects that are expected in the immediate vicinity of the Five Points Station during the same time period, including MARTA's Summerhill BRT project and the Centennial Yards redevelopment. For all of these projects, the EA lists "construction, traffic" as anticipated impacts. Yet the EA does not consider the cumulative impact these projects will have on traffic and mobility in the Five Points area, nor does it address how these cumulative impacts will be mitigated.

All of these projects will likely involve street and sidewalk closures, further exacerbating the mobility challenges of closing street access to the Five Points Station. A coordinated mobility plan incorporating all anticipated closures, any re-routing of existing transit service, and any new circulator transit service should be prepared to ensure that the cumulative impacts of these closures on mobility are addressed in an integrated and comprehensive fashion.

⁸ "Mitigation means measures that avoid, minimize, or compensate for effects caused by a proposed action or alternatives as described in an environmental document or record of decision and that have a nexus to those effects." 40 C.F.R. § 1508.1(s).

⁹ NEPA defines "effects" to include cumulative effects, which are "effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." 40 C.F.R. § 1508.1(g)(3).

Failing to prepare a comprehensive mobility strategy for these massive, concurrent projects risks rendering the Five Points area unnavigable for an extended period of time.

III. The EA Must Evaluate An Integrated Bus Terminal At The Station As An Alternative.

Beyond the need to maintain and repair the station, the EA identifies several “guiding principles” the project is intended to achieve: circulation, safety, activation, passenger comfort, and civic heart. (EA at 18). The EA offers additional explanations of the project’s purpose and need elsewhere.¹⁰ But no matter the precise formulation of these goals, there are a myriad of other alternatives that could achieve them but are not considered in the EA. For example, the EA does not address lower-cost options for addressing roof maintenance such as repairing the existing roof or incorporating a new canopy without removing the existing roof entirely.

Likewise, the EA fails to consider other alternatives for improving bus transfers at the station. One particular alternative that meets all five guiding principles but is not considered in the EA is the creation of connected bus terminal to house all bus service at the station. The current plan includes bus bays on two sides of the station, a design that fails to meet the stated goals of improving safety, activation, passenger comfort, and civic heart. A dedicated, below-grade bus directly connected to the rail station would better serve these goals by removing the ring of idling buses that would surround the station plaza under the current proposal.



Rendering of Below-Grade Bus Terminal at Denver's Union Station

The Five Points Station’s existing plaza level is located significantly above grade, so there are various options for incorporating a dedicated bus terminal. One option would be

¹⁰ The EA also states that project’s purpose is to modernize the facility, increase natural light and air circulation, and enhance site access and safety. (EA at 2-5). Elsewhere, the EA summarizes these considerations as “creat[ing] a welcoming and better functioning station.” (EA at 2).

constructing a new facility on the western side of Forsyth Street as part of the Centennial Yards redevelopment project. Another option would be to construct a ramp down from Forsyth or another adjacent street to incorporate the bus facility into the station's existing footprint.

Although this additional construction would increase the project's scope and expense, better integrating bus service into the station would be transformative and clearly serves the project's stated purpose. The EA fails to consider the merits of such an alternative, so it is impossible for the public to consider the merits of such a proposal and whether any additional expense might be justified.

MARTA may have considered other alternatives for constructing the roof, and the current plan may be the best choice. MARTA may have considered other alternative ways for handling bus service at the station, and the current plan may also be the best choice. But because the EA does not consider any of these alternative and does not offer information comparing the relative merits of other options, the public cannot understand why the current plan is the best one. Helping the public to understand how MARTA selected the current plan from all of the competing options is not only required by NEPA, but is essential to establishing trust and goodwill with the public as MARTA embarks on this massive and expensive undertaking.

Conclusion

Thank you for your consideration of these comments. We are excited about this effort and encourage MARTA to approach this Environmental Assessment, as well as the NEPA process for future capital projects, as an opportunity to increase transparency, incorporate public feedback into its decision making, and improve the ultimate design of its projects.

Sincerely,

Patrick King

Southeast Mobility Choices Advocate
Natural Resource Defense Council

Brian Gist

Senior Attorney
Southern Environmental Law Center



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January 5, 2024

VIA Email

Collie Greenwood
General Manager / Chief Executive Officer
MARTA
2424 Piedmont Rd NE,
Atlanta, GA 30324
publichearinginfo@itsmarta.com

Yvette Taylor
Region IV Administrator
Federal Transit Administration
230 Peachtree Street, NW, Suite 1400
Atlanta, GA 30303

Dear Ms. Taylor and Mr. Greenwood,

Thank you for the opportunity to comment on the MARTA Five Points Station Transformation Draft Environmental Assessment (“Draft EA”).

As you know, Central Atlanta Progress has been a participant in the Five Points Station Transformation (the “project”) planning process since the project’s inception. We have watched as the project’s key goals and its need and purpose have shifted from improving the public realm to addressing water incursion.¹ We have consistently requested meetings, convened stakeholder meetings, provided feedback, and participated in the formal process, yet the engagement conducted continues to be a formality— comments of concern from Downtown stakeholders have repeatedly been ignored. There is a disconnect between the purpose and need, the alternatives considered, and the criteria used to evaluate the single alternative considerations; major issues with the current Five Points Station (e.g. on-street bus staging and loading creating a significant barrier, a large, inactivated plaza, a disconnected street grid, etc.) are not being addressed by this proposed \$205 million project.

From our perspective, MARTA has not recognized our feedback to date; however, rather than retreading years of prior feedback on the overall concept and approach, the following comment is intended to respond specifically to the shortcomings in the Draft EA and MARTA’s failure to meet the intent of NEPA.

NEPA aims to ingrain meaningful public participation into decision making by requiring agencies to consider project impacts, share its analysis with the public, consider alternatives, outline mitigation tactics for adverse impacts, and respond to public concern. On each of these points, the Draft EA is lacking.

¹ FTA Environmental Standard Operating Procedures (2019) – “A project’s purpose and need should exhibit continuity from planning, through each project development phase, to project approval.”

NEPA requires MARTA to consider and document alternatives. Despite many calls from stakeholders to consider alternative layouts that would improve the overall public realm and support off-street bus services, MARTA's Draft EA only includes two alternatives: No Build and Build. Stakeholders have repeatedly called for moving bus staging off-street, creating improved pedestrian experience and connectivity. More specifically, stakeholders have requested an in-depth analysis of constructing an off-street, below-viaduct bus facility across Forsyth Street, allowing transferring patrons platform level access. Below viaduct access to the station already exists in the current station, and the unique positioning of Five Points adjacent to viaducts allows for creative placement of bus infrastructure that will not disrupt the pedestrian condition of Downtown. There is no discussion of this—or any other—alternative design, nor is there sufficient analysis or explanation for the decision-making process.² This approach ignores public feedback, undermining the premise of NEPA.³

NEPA also requires agencies to consider connected and cumulative actions.⁴ MARTA has been in the process of developing a Bus Network Redesign since 2021. It is anticipated that this Bus Network Redesign will impact the routing of buses that stage and load at Five Points Station. The currently proposed design for the project includes several on-street bus bays for bus loading and staging; however, MARTA has failed to document the impacts of the Bus Network Redesign on the overall quantity of bus bays needed at the Five Points Station. Similarly, Summerhill BRT is currently under construction, and MARTA has failed to document the cumulative nature of the two projects under construction concurrently and the connected relationship between them. Investing in ADA upgrades and pedestrian amenities on Broad Street between M.L. King Jr. Dr. and Broad Street would serve to connect the two federally funded projects. The failure to consider the project's relationship to both Summerhill BRT and the Bus Network Redesign in the Draft EA is a significant oversight that threatens to undermine the success of all three projects.

In the Draft EA, consideration is given to the impact of the project on historic architecture. However, the project's impact on transit access—arguably the most significant adverse effect—is only mentioned in passing. While heavy rail transfers will remain open, the project will close street access to Five Points Station, which services approximately 55,000 bus and rail customers daily— for 18 months. Agencies must consider environmental justice (EJ) impacts in NEPA review, and MARTA's closure of the Five Points station will have significant EJ implications. As of the last on-board transit survey (2019), 66.9% of MARTA riders were Black and approximately 65% of riders reported income below the average median income for metro Atlanta. In recent years, national trends suggest that transit riders are

² 40 CFR 1502.14 – “Agencies shall: (a) Evaluate reasonable alternatives to the proposed action, and, for alternatives that the agency eliminated from detailed study, briefly discuss the reasons for their elimination. (b) Discuss each alternative considered in detail, including the proposed action, so that reviewers may evaluate their comparative merits.

³ 23 CFR 771.105(d) – “(d) Public involvement and a systematic interdisciplinary approach be essential parts of the development process for proposed actions.”

⁴ 40 CFR 1508.01 – Cumulative effects are “effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions”

increasingly from EJ populations. While the closure will have dramatic impacts on EJ populations, MARTA has failed to document this closure as an adverse effect or to propose any tactics for mitigation.⁵

The Draft EA outlines a project that fails to include stakeholder and public feedback, ignores potential alternatives, lacks consideration of connected projects, and –most notably—fails to propose mitigation tactics for a significant station closure with enormous EJ implications. The Draft EA fails to meet the intent of NEPA just as the project has continuously strayed from its original concept, need, and purpose.

Sincerely,

A handwritten signature in black ink, appearing to read 'A.J. Robinson', with a long horizontal flourish extending to the right.

A.J. Robinson

President

Central Atlanta Progress/Atlanta Downtown Improvement District

⁵ 23 CFR 771.133 – “mitigation includes (a) Avoiding the impact altogether by not taking a certain action or parts of an action. (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation...(e) Compensating for the impact by replacing or providing substitute resources or environments.”



January 5, 2024

Mr. Collie Greenwood
General Manager/Chief Executive Officer
MARTA
2424 Piedmont Rd NE
Atlanta, GA 30324

SUBJECT: Environmental Assessment, MARTA Five Points Station Transformation Project, November 2023

Thank you for the opportunity to comment on MARTA's upcoming Five Points Station transformation.

The Metro Atlanta Chamber has been a longtime, strong supporter of mass transit in metro Atlanta and the counties throughout our region. We are keenly aware of the importance of MARTA and other transit systems throughout the region as they play a key role in economic development and community vitality.

As you are aware, the Atlanta Sports Council, the sports division of the Metro Atlanta Chamber, serves as the lead organization for recruiting and planning major, global sporting events in our region, including the upcoming FIFA World Cup 2026. The 2026 event will mark the largest FIFA World Cup in history and feature 48 teams and more than 100 matches.

Atlanta was selected as one of 11 U.S. host cities and is looking forward to welcoming the world in 2026. Ensuring a successful tournament in our region is a top priority and their experience here and the impression we make will define how Atlanta is perceived globally. A large majority of these visitors will be using MARTA during their stay.

We understand the need to renovate and transform the Five Points Station and support it. As a world-class city, our millions of residents and visitors deserve world-class transportation infrastructure. Effective, seamless transit operations will make a lasting, positive impression on visitors and media from all over the world, who come to Atlanta for the FIFA World Cup 2026.

That said, we want to unequivocally express our opinion that the Five Points station needs to be open to passenger ingress and egress from street level during the duration of the tournament.

We have heard a range of different estimates for the duration of the renovations. If the



work will require impairment/closing of direct passenger access from the street/sidewalks, then we strongly encourage the work program to be modified to accommodate the full functionality of the station from March 2026 through September 2026, at a minimum.

Alternatively, if that is not possible, we support delaying the start of the transformation project until the fall of 2026, after the FIFA World Cup 2026 matches have concluded.

Thank you for the opportunity to share our firm belief on this important issue, and we look forward to continued partnership as we execute a successful FIFA World Cup 2026 in Atlanta.

Thank you,

Dan Corso
President
Atlanta Sports Council

Katie Kirkpatrick
President and CEO
Metro Atlanta Chamber



Patrick King
Southeast Mobility Choices Advocate
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Brian Gist
Senior Attorney
Southern Environmental Law Center
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March 21, 2024

Dear Misters King and Gist:

Thank you for sharing your comments on the draft Environmental Assessment (EA) of the Five Points Station Transformation project. We value the missions of your organizations and your input on this critical regional project. We offer the following responses to the key concerns identified in your letter from Jan. 5, 2024:

I. MARTA Must Fully Consider The Impacts Of Prohibiting Street Access To The Five Points Station During Construction, And Identify Ways To Minimize Those Impacts.

Closure of street access for customers:

MARTA's decision to temporarily close street access to Five Points Station is based first and foremost on the safety of our customers, neighbors, employees, and our construction teams. The design of the existing Five Points Station, with post-tensioned steel and concrete beams across the length of the building, makes it difficult to phase the deconstruction of the existing canopy in a way that would allow MARTA to safely maintain an open entrance. These beams must be removed in a specific order using a very large crane that will swing across the entire site. The deconstruction plan is detailed in *Section 1.4.2* of the draft EA and additional details are provided in *Section 14.4.2.2*.

We have fully considered the adverse effects of the temporary closure on our customers, and we are developing a robust service detour and outreach plan, detailed below, to mitigate any effects. We note that while inconvenient these closures are temporary, and our detour plans provide customers with alternate destinations that fall within an acceptable half-mile walkshed (considered the standard radius for reasonable transit access). Buses that currently pass by Five Points Station will continue to do so, and customers may board and alight adjacent to Five Points Station if they prefer not to walk or are unable to walk from a nearby rail station.

We disagree with your comment that the discussion of the impacts from this temporary street closure is "incomplete and cursory." The intent of the EA is to disclose impacts from the project and

if warranted, the mitigation. The EA discloses the need to relocate bus operations during construction as well as the mitigation for the impact, which is the preparation of the service detour and outreach plan. The draft EA did not include all of the details of the service and detour plan itself because it requires extensive coordination across all departments of MARTA and with dozens of external stakeholders, work that is still ongoing. At the time of the drafting of the EA, we disclosed what was known at that time. *Section 2.3.2.2* includes details about the process and tactics we intend to use in developing the service and detour plan and to inform our customers about that plan.

Consideration of reasonable alternatives (to the temporary street access closure):

As noted, MARTA believes that the closure of the concourse and plaza levels is required to mitigate the risk to public safety. The temporary closure will also minimize disruption by reducing the overall construction timeline. In response to your specific proposals for mitigation of temporary construction impacts, we offer the following responses:

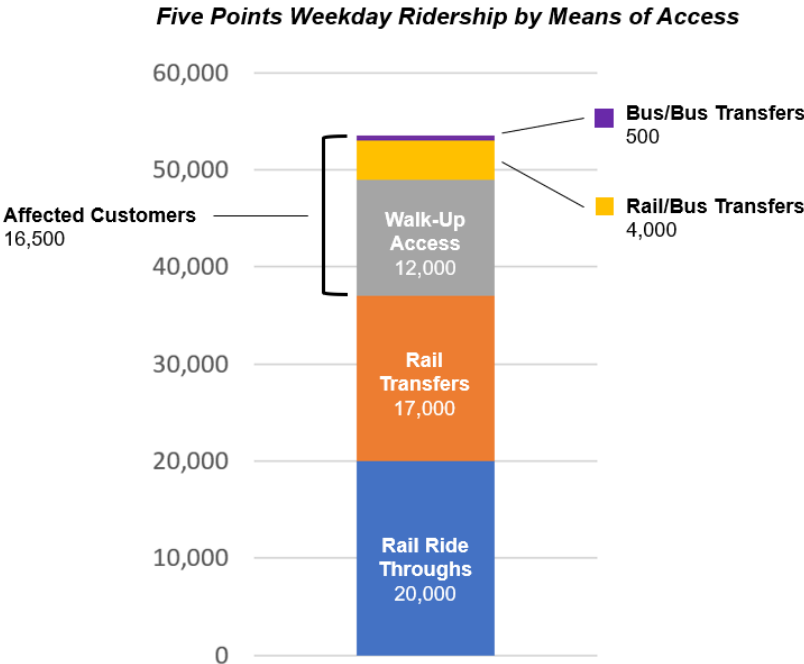
- i. ***Phasing demolition and construction to keep an entrance open:*** It is the judgment of MARTA engineering staff and our design partners that it is not possible to safely deconstruct the canopy without some risk to each of the existing entrances to the station.
- ii. ***Modifying the schedule to shorten closure:*** The proposed schedule in the draft EA is a best effort at shortening the overall construction timeline for the demolition. It is the judgment of the project team and MARTA leadership that it is better for our customers and the surrounding community to endure a shorter complete closure that allows our construction team to work unimpeded rather than a schedule that lengthens the overall project timeline.
- iii. ***Hardening an entrance:*** It is the judgment of our project team and engineers that it is not possible to construct temporary protection for an entrance that can reliably endure the potential impact of a multi-ton steel-and-concrete beam dropped from above. This is primarily a concern during demolition. We are exploring options for restoring street access as soon as possible during construction of the new plaza and canopy.

Mitigating detrimental effects:

As discussed above, the proposed service detour and outreach plan is the proposed mitigation measure to address the expected temporary construction impacts. We appreciate your suggestions for providing additional options for our customers and we will be certain they are considered by the team. In the interest of transparency, we offer the most current details about the plan below, with the understanding that it will be subject to revision up to the time of closure and beyond, as we assess travel patterns and behavior. Every effort is intended to minimize disruption to our customers and ensure they can reach their destinations quickly and safely.

Estimate of affected customers (primary audience):

- Approximately 4,500 passengers using buses will be significantly affected by the detour effort
- Approximately 12,000 walk-up passengers will be within ½ mile of other stations and will have remaining bus options
- Rail ride-through passengers and those making rail transfers will not be affected by detours



Bus Detour strategies:

- Maintain direct Downtown access with stops at Five Points Station on some routes
- Detour bus routes that terminate and layover at Five Points to other nearby stations
- Increase capacity at nearby stations by making temporary transit accommodations (coordinated with City of Atlanta)

Bus detours by Station (subject to change):

Rail Station	Five Points Bus Routes Detoured
Georgia State	Route 21 – Memorial Dr Route 42 – Pryor Rd Route 49 – McDonough Blvd Route 55 – Jonesboro Rd Route 186 – Rainbow Dr/South DeKalb
King Memorial	Route 26 – Marietta St/Perry Blvd Route 899 – Old Fourth Ward
Civic Center	Route 816 – North Highland Ave
Through-Routed to Maintain Service to Five Points Area	Route 3 – Martin Luther King Jr Dr/Auburn Ave Route 40 – Peachtree St/ Downtown Route 813 – Atlanta University Center

Mitigation measures for stations receiving bus detours:

- Temporary bus stop zones outside stations
- Temporary bus layover zones near stations
- Converting some no-parking zones into parking for MARTA vehicles
- Enhanced signage, maps, and wayfinding
- Additional seating, shelter, trash cans
- Additional lighting at new bus locations
- Enhanced security, in form of additional MARTA Police presence and cameras
- Cleaning and cosmetic repairs
- Restroom access plans
- Confirming ADA access and elevator outage plans

Five Points Station signage and wayfinding:

An extensive signage and wayfinding plan is being developed, with two phases:

- **Phase 1 (Preview):** This phase communicates to customers at least 60 days in advance of the closure. It will include all four levels of Five Points, including both platforms, the concourse, plaza, and the exterior on all sides.
- **Phase 2 (Closure):** This phase is intended to last for the duration of the closure. It will have two main elements:
 - **Platforms:** This will be focused on making sure all rail customers are aware that they are not able to exit the station except in emergencies. It will also provide project information and wayfinding for how to reach key destinations via adjacent stations.
 - **Exterior:** This will be focused on communicating to walk-up and bus customers outside the station that they will not be able to enter. It will include wayfinding to adjacent stations, as well as general project information and renderings.

Signage materials:

We anticipate thousands of signs of various types and materials throughout both phases. We're planning to coordinate with an outside design firm to design this signage for consistency and legibility. These include:

- Large-format wall decals and vinyl banners in high-traffic locations both inside and outside the station on construction fencing
- Smaller wall decals on columns at the platform level, where sight distances and wall space in some locations are limited
- Wall decals for the temporary plywood construction barriers on the platform level for the Station Rehab project
- Floor decals on the platform levels to capture attention from customers as they board and alight trains
- (Phase 1 only): A-frames for the concourse and plaza levels that can be moved around to different locations. A-frames cannot be placed on the platform levels for safety reasons.
- Chloroplast (a.k.a. plastic yard signs) that can be tied to lightpoles and other fixtures inside and outside the station

Printed collateral and canvassing:

- Customized flyers to be distributed on each bus route, with specific detour instructions.
- General flyers to distributed to all walk-up customers at the faregates, with a simple map showing the nearest adjacent stations and a QR code for the website.
- Flyers targeted to Customer Services that will be relocated to Ashby Station during the closure: Ride Store, Reduced Fare Office, and Lost & Found.
- Customized map for Georgia State University, providing alternate directions to key campus locations not served by Georgia State Station.

Station and vehicle announcements:

- Station announcements: Recorded messages announcing the closure will be featured in the regular rotation of audio announcements system-wide.
- Vehicle announcements:
 - Recorded messages announcing the closure will be added to all bus routes and trains system-wide.
 - New versions of the Five Points arrival message, which will note the closure instead of the destinations there.
 - New messages for each of the adjacent stations to encourage customers to exit at alternate locations to reach destinations around Five Points Station.

Digital tactics:

- Website: Detour information will be available at itsmarta.com and more detailed project information will be available at fivepointstransformation.com.
- Trip Planning: Internal trip-planning tools will be updated, along with providing closure information to Google, Apple, Transit, and other third-party apps used by customers.
- Social Media: MARTA will leverage its primary platforms: Facebook, Instagram, X, NextDoor, and LinkedIn through regular posts, supported by paid campaigns.
- Email: MARTA will send frequent email updates to its entire Mailchimp audience, which currently has more than 160,000 customers and stakeholders.
- Paid Media: Besides paid social media posts for higher visibility, we are planning to place paid advertising on local TV and radio stations ahead of the closure.
- Earned Media: MARTA will host media briefings for news media and provide availability of MARTA leaders for interviews leading up to the closure.

II. MARTA Must Consider The Cumulative Impacts Of Construction Projects On Mobility In The Five Points Area.

We recognize there are other construction projects coming to Downtown Atlanta, including Centennial Yards and MARTA's own Rapid Summerhill (Bus Rapid Transit) project. We disagree that these projects will cause significant cumulative effects that limit mobility in the Five Points Station area. To address each:

- **MARTA Rapid Summerhill:** This project is currently under construction along Hank Aaron Avenue south of Downtown. We anticipate beginning construction in Downtown in late spring or early

summer of 2024. This work will be limited to lane closures along MLK Jr. Drive, which is a full block south of Alabama Street. This will require installation of a BRT station in the north lane of MLK Jr. Drive at Broad Street and resurfacing of one lane. It is our judgment that this construction will not have a major effect on circulation Downtown for pedestrians or motorists.

- **Centennial Yards:** This is a multi-year, multi-phased major mixed-use private development that is largely taking place below street grade in “The Gulch.” The phasing of this project is still very much in planning. The date when any construction would begin at the eastern portion of the Gulch adjacent to our project is currently unknown. However, the majority of construction activities will be taking place below the viaduct off of public streets. MARTA is in regular communication with this developer and will consider developing additional mitigation measures in the event that construction near Five Points Station moves forward on a timeline that overlaps with the Transformation project.

III. The EA Must Evaluate An Integrated Bus Terminal At The Station As An Alternative.

MARTA conducted a concept design study prior to the selection of the preferred alternative, which was carried into the Environmental Assessment as the Build Alternative. The guiding principles set out in the EA were used during the concept development phase of the project to arrive at a preferred concept. Throughout the feasibility and concept study phases of the project MARTA conducted project status briefings with the City of Atlanta and other key stakeholders, including Central Atlanta Progress. This included a presentation on the alternatives considered and briefing on the preferred option known through the process as Option 9A.

MARTA considered 13 concept options, compared them based on the guiding principles, and narrowed the options to three. All these options are detailed in the attached *Table 1*. Based on coordination with stakeholders, two additional options were considered. These options were compared based on the guiding principles, an intermodal transfer experience evaluation, constructability and cost. These options included concepts for reconnecting Broad Street with bus bays and developing an on-site or adjacent bus terminal similar to what was presented in your comment letter. The concepts were compared and coordinated with stakeholders and were not preferred for technical reasons and cost. The following summarizes why alternatives were dismissed during the planning studies:

- **Broad Street Connection:** Concepts related to this option could create unintended pedestrian flow that may create a roadway crossing safety issue. Wayfinding could be more complicated for people coming out of the station on the wrong side of the street for their bus. The addition of the roadway does not leave additional space for civic spaces or opportunities for future development on the site because it bifurcates the site. Engineering constraints inside the station would reduce the concourse ceiling height and potentially harm the Eiseman Building Façade. The grade of Broad Street across the site would adversely impact bus operations as well as ADA access.
- **Consolidated bus terminal:** Concepts considered included on-site, street-level, and below-ground off-site bus terminals. These options were deemed not feasible because of the increase in construction costs and more extensive construction. The on-site option also does not leave

additional space for civic uses at the station as well as creating additional safe pedestrian access concerns. The off-site options would go beyond the existing station footprint and thus require property acquisition, a substantial increase in cost, and would increase travel time for bus-to- rail connections, leading to equity concerns. MARTA's design team conducted a highly detailed study of how each option would affect transfer times for our customers.

The preferred alternative was presented to the MARTA board on March 9, 2023. Throughout the concept development stage, MARTA met with stakeholders and the public to understand preferences, site needs, and concerns. Input from this process informed the decision on the preferred alternative. *Section 15* of the EA summarizes the outreach during the concept development. The EA compares the Build Alternative to the No-Build Alternative and how they meet the project's purpose and need. Additionally, the EA considered a roof repair alternative, but determined that it did not meet the project's purpose and need and is discussed in *Section 1.4.2 -- Alternative Considered but Dismissed*, and *Section 14.4.2 -- Feasible and Prudent Avoidance Alternatives*.

We thank you again for your detailed concerns and look forward to further engagement with your organization as we move forward on this transformational project.

Regards,

DocuSigned by:

0E80135AB8A5439...
Collie Greenwood
General Manager/CEO

CC:

Dr. Yvette Taylor
Region IV Administrator
Federal Transit Administration
230 Peachtree Street, NW, Suite 1400
Atlanta, GA 30303

Enclosures:

Table 1: Conceptual Design Alternatives Considered During Prior Studies

Table 1: Conceptual Design Alternatives Considered During Prior Studies

Concept	Description	Design Elements & Operational Implications
1	Broad Street Extended with Double-loaded Bus Lanes	• Crossing required for interline transfer or if they came out of the station on the wrong side • Bus queuing takes up plaza area • Significant elevation difference between plaza and sloped new road towards the southern half of the site; ADA access requirements • Significant reduction in usable plaza space • Programmatic and space requirements leave no area for civic space • Breaks the potential for connecting Broad Street experience/environment from north to south • Potential TOD looks at bus station • Complicates access to light and air at concourse level • Prevents central iconic head house
1B	Elevated Plaza over Broad St Bus Plaza	
2	Broad Street Extended with Single Bus Lane	• Complex wayfinding across Forsyth site for interline transfer • Bus queuing takes up plaza area • Significant elevation difference between plaza and sloped new road towards the southern half of the site: ADA access required • Significant reduction in usable plaza space • Programmatic and space requirements leave no area for civic space • Breaks the potential for connecting Broad Street experience/environment from north to south • Potential TOD looks at bus station • Complicates access to light and air at concourse level • Prevents central iconic head house

Concept	Description	Design Elements & Operational Implications
3	Bus Bays on Alabama Street	- No street crossing required for passenger transferring between buses and bus to train - Consolidated bus shelter - Continuation of the lively and pedestrian Broad Street experience/environment from north to south - Clear line of sight for BRT connection from MLK, Jr. Drive - Maximizes central space opportunities - Potential TOD view is of civic space, not bus station - Minimal intervention with possibility for permanent bus station located over the CSX tracks (i.e. Initial Phase) Bus Option 3 Buses on Alabama Street - Idling bus sound and fumes may require addition of soft buffer zone - Bus stop spacing (particularly at the intersection of Alabama and Broad) to be widened to create a clean pedestrian connection south - Enhance Alabama Street experience from east to west
4	Bus Plaza over CSX Tracks	- Consolidated bus station - Ease of access to plaza - Street crossing not required for bus to train transfer - Maximizes central space opportunities - Clear connection to BRT on MLK, Jr. Drive - Continuation of the lively and pedestrian Broad Street experience/environment from north to south - Programming over new bus station (i.e. soccer pitch) - Utilize existing Alabama Street bus staging until CSX site development is completed - Complex construction over rail - Structural analysis for overbuild
4C	Integrated Parking CSX Bus Plaza	
5	On-Grade Bus Plaza at 143 Alabama (East Side)	- Existing headhouses removed - New centralized headhouse with new canopy, New plaza-level fare lines and elevator - Plaza includes recreational space, urban garden, and retail - New bus plaza at 143 Alabama on Forsyth with at-grade and below-ground connections to create transit complex
6	Underground Bus Terminal at 143 Alabama (West Side)	
7	Bus Plaza under Forsyth Street TOD	- West and Alabama Street headhouses removed, combined under Forsyth Street TOD - New plaza-level fare lines and elevator - Bus plaza located below New centralized headhouse on east plaza - Forsyth Street TOD. New plaza to include recreational space, urban garden, and retail

Concept	Description	Design Elements & Operational Implications
AFTER INITIAL REVIEW, BELOW CONCEPTS WERE DEVELOPED AT THE REQUEST OF COA.		
8A	Multimodal Broad Street (2 Headhouses)	• Plaza Space bifurcated and significantly reduced • Nominal area available for site activation • Intermodal transfer requires crossing new Broad Street; compromises pedestrian safety • Introduces multi-modal traffic on Alabama St; compromises pedestrian connectivity to BRT • Plaza opening is closed; smoke evacuation and natural ventilation / lighting may be impacted • Roadway slope reduces head height for a significant area of Concourse • Bus queuing compromises pedestrian connection from North to South Broad Street
8B	Multimodal Broad Street (1 Headhouse)	• Plaza Space bifurcated and significantly reduced/Severely limited area for site activation with the introduction of TOD • Intermodal transfer requires crossing new Broad Street; compromises pedestrian safety • Introduces multi-modal traffic on Alabama Street • Compromises pedestrian connectivity to BRT • Plaza opening is closed; smoke evacuation and natural ventilation / lighting may be impacted • Roadway slope reduces head height for a significant area of Concourse • Bus queuing compromises pedestrian connection from North to South Broad Street
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Concept	Description	Design Elements & Operational Implications
9B	East and West Sides of Forsyth Street	• Requires expansion of sidewalk on the west side of Forsyth Street to accommodate both pedestrian traffic and bus waiting area • East curb line is modified / shifted into the site to accommodate bus layby • Forsyth Street is reduced by 2 lanes to accommodate bus layby lanes on both sides of Forsyth Street • Requires street crossing for station access - safety concerns • Intermodal connection between buses staged on the west side of Forsyth and the trains is significantly compromised • Bus requires lane sharing with private vehicles • Requires traffic re-routing • Explores potential for bus operations only for Forsyth Street and subsequent impact on surrounding streets
9C	Forsyth Street Split Operation	• Forsyth Street is reduced by 2 lanes to accommodate bus layby lane on both sides of Forsyth Street • Split operation on both sides of Forsyth • Complicates and compromises direct station access and wayfinding • Intermodal connection between buses staged on the west side of Forsyth and the trains is significantly compromised • Bus requires lane sharing with private vehicles • Use of west side of Forsyth Street requires coordination with private developer • Explore potential for bus operations only for Forsyth Street



A.J. Robinson
President
Central Atlanta Progress/Atlanta Downtown Improvement District
84 Walton St. NW #500
Atlanta, GA 30303

March 21, 2024

Dear Mr. Robinson:

Thank you for submitting comments in response to the draft Environmental Assessment (EA) for the Five Points Transformation project.

As a threshold matter, we respectfully disagree with your assertion that the comments of concern from Downtown stakeholders have been ignored, even if the proposed design has not fully satisfied all your organization's preferences. We have held numerous engagements with your organization for the life of this project, including in-person site visits, visits by MARTA staff and the project team to your office, multiple virtual meetings, phone calls, and emails. The input of CAP membership has been considered and in some instances is specifically reflected in our current design. For example, a wide raised crosswalk across Forsyth St. opposite of the station entrance has been added to plans at a request from developers at a meeting at your offices in late 2022. The following formal meetings included CAP Participation, not inclusive of other phone calls, ad hoc meetings and emails:

- 11/05/2019 – Kick-off Meeting Feasibility Study
- 02/12/2020 – Presentation on the recommendations for the deconstruction of the canopy
- 05/01/2020 – Broad Street Work Session
- 09/14/2021 – Briefing to Atlanta Downtown Neighborhood Association
- 05/10/2022 – Briefing to Atlanta Downtown Neighborhood Association
- 07/12/2022 – Presentation of Conceptual Alternatives
- 02/24/2023 – Project Briefing to CAP on Option 9A
- 03/01/2023 – Briefing and Station Walk to present selected Option 9A
- 10/25/2023 – Section 106 Consultation Meeting

We offer the following responses on each of the remaining concerns identified in your letter from Jan. 5, 2024:

- **Alternatives:** We have heard the repeated concerns expressed by your organization about the presence of buses on the surface streets surrounding Five Points Station. In coordination with our design team at SOM, we conducted a lengthy and detailed assessment of various bus configurations, including one that would place bus operations in a new facility on property not currently owned by MARTA, across and below Forsyth Street. In addition, we reviewed the demographics of the routes currently terminating at Five Points Station and analyzed the potential impacts that permanently

moving these routes would have on access to key destinations and employment centers. Locating our bus operations across Forsyth Street would require the purchase of property outside the footprint of the existing station and thus would result in our bus customers having to make unacceptably long and circuitous transfers. A change of this magnitude at the station raises significant equity concerns. MARTA is a transit agency that operates multiple modes to connect our customers to essential destinations in our service area. Buses are and always will be an essential component of our system, and our bus customers expect and deserve an experience that is as convenient for them as it is for our train customers.

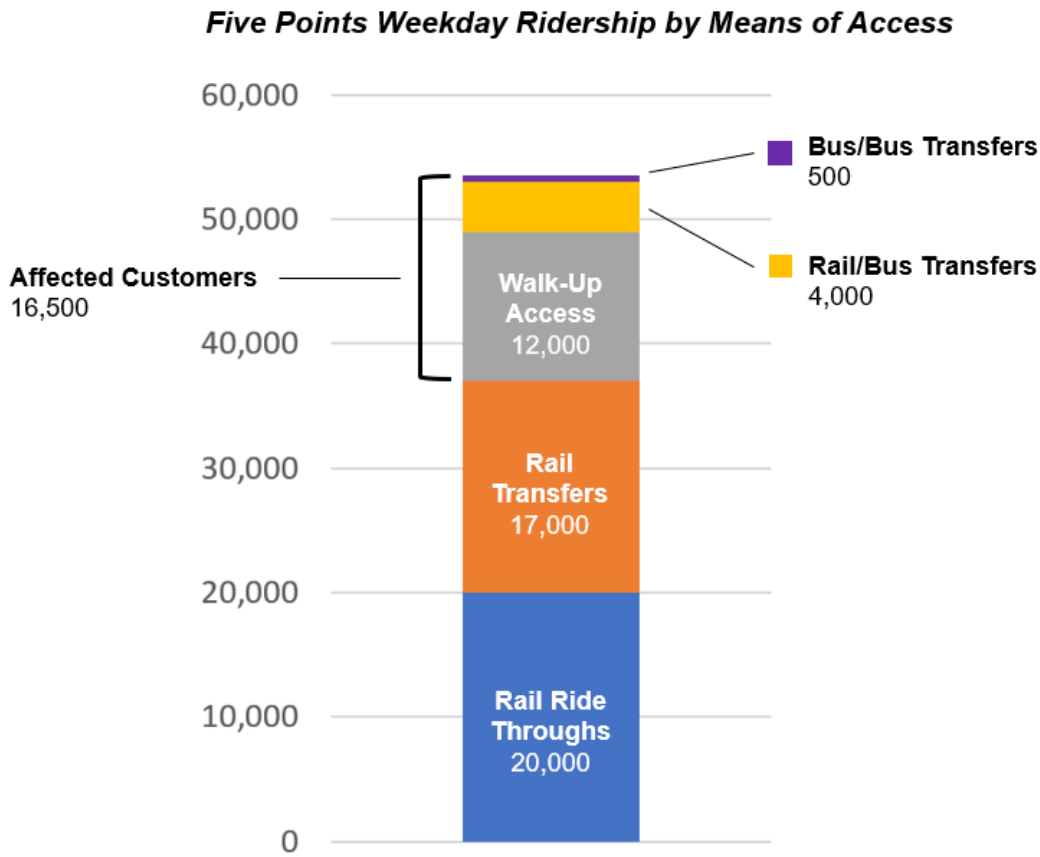
As I believe you are aware, MARTA considered various alternatives during the planning of the Five Points Station Project. We attach a table (Table 1 in Enclosures below) that identifies the 13 options that were considered. Five of these were advanced for rough-order-of-magnitude cost estimates, including one for a below-grade bus terminal at 143 Alabama Street (Option 6) requested by CAP.

- ***Temporary Construction Impacts:*** Your comments express concern about the impacts on MARTA customers from Project construction. First, it is important to understand that the majority of customers who pass through Five Points Station will not be affected by this project. Our ridership data indicates that approximately 55,000 customers pass through the station daily. About 4,500 customers transfer to and from bus and rail at Five Points, while approximately 12,000 customers enter and exit the station. It is that 16,500 subset of customers who will be impacted by the entrance closures and disruption caused by the project. We are preparing a major outreach campaign and service detour plan to prepare those customers and surrounding businesses and institutions for the temporary change.

In the interest of transparency, we offer a summary of the most current version of the service detour and outreach plans, with the understanding that they will be subject to revision up to the time of closure and beyond, as we assess travel patterns and behavior. Every effort is intended to minimize disruption to our customers and ensure they can reach their destinations quickly and safely.

Estimate of affected customers (primary audience):

- Approximately 4,500 passengers using buses will be significantly affected by the detour effort
- Approximately 12,000 walk-up passengers will be within ½ mile of other stations and will have remaining bus options
- Rail ride-through passengers and those making rail transfers will not be affected by detours



Bus Detour strategies:

- Maintain direct Downtown access with stops at Five Points Station on some routes
- Detour bus routes that terminate and layover at Five Points to other nearby stations
- Increase capacity at nearby stations by making temporary transit accommodations (coordinated with City of Atlanta)

Bus detours by Station (subject to change):

Rail Station	Five Points Bus Routes Detoured (subject to change)
Georgia State	Route 21 – Memorial Dr Route 42 – Pryor Rd Route 49 – McDonough Blvd Route 55 – Jonesboro Rd Route 186 – Rainbow Dr/South DeKalb
King Memorial	Route 26 – Marietta St/Perry Blvd Route 899 – Old Fourth Ward

Civic Center	Route 816 – North Highland Ave
Through-Routed to Maintain Service to Five Points Area	Route 3 – Martin Luther King Jr Dr/Auburn Ave Route 40 – Peachtree St/ Downtown Route 813 – Atlanta University Center

Mitigation measures for stations receiving bus detours:

- Temporary bus stop zones outside stations
- Temporary bus layover zones near stations
- Converting some no-parking zones into parking for MARTA vehicles
- Enhanced signage, maps, and wayfinding
- Additional seating, shelter, trash cans
- Additional lighting at new bus locations
- Enhanced security, in form of additional MARTA Police presence and cameras
- Cleaning and cosmetic repairs
- Restroom access plans
- Confirming ADA access and elevator outage plans

Five Points Station signage and wayfinding:

An extensive signage and wayfinding plan is being developed, with two phases:

- Phase 1 (Preview): This phase communicates to customers at least 60 days in advance of the closure. It will include all four levels of Five Points, including both platforms, the concourse, plaza, and the exterior on all sides.
- Phase 2 (Closure): This phase is intended to last for the duration of the closure. It will have two main elements:
 - This will be focused on making sure all rail customers are aware that they are not able to exit the station except in emergencies. It will also provide project information and wayfinding for how to reach key destinations via adjacent stations.
 - This will be focused on communicating to walk-up and bus customers outside the station that they will not be able to enter. It will include wayfinding to adjacent stations, as well as general project information and renderings.

Signage materials:

We anticipate thousands of signs of various types and materials throughout both phases. We're planning to coordinate with an outside design firm to design this signage for consistency and legibility. These include:

- Large-format wall decals and vinyl banners in high-traffic locations both inside and outside the station on construction fencing
- Smaller wall decals on columns at the platform level, where sight distances and wall space in some locations are limited
- Wall decals for the temporary plywood construction barriers on the platform level for the Station Rehab project
- Floor decals on the platform levels to capture attention from customers as they board and alight trains
- (Phase 1 only): A-frames for the concourse and plaza levels that can be moved around to different locations. A-frames cannot be placed on the platform levels for safety reasons.
- Chloroplast (a.k.a. plastic yard signs) that can be tied to light poles and other fixtures inside and outside the station

Printed collateral and canvassing:

- Customized flyers to be distributed on each bus route, with specific detour instructions.
- General flyers to distributed to all walk-up customers at the faregates, with a simple map showing the nearest adjacent stations and a QR code for the website.
- Flyers targeted to Customer Services that will be relocated to Ashby Station during the closure: Ride Store, Reduced Fare Office, and Lost & Found.
- Customized map for Georgia State University, providing alternate directions to key campus locations not served by Georgia State Station.

Station and vehicle announcements:

- Station announcements: Recorded messages announcing the closure will be featured in the regular rotation of audio announcements system-wide.
- Vehicle announcements:
 - a. Recorded messages announcing the closure will be added to all bus routes and trains system-wide.
 - b. New versions of the Five Points arrival message, which will note the closure instead of the destinations there.
 - c. New messages for each of the adjacent stations to encourage customers to exit at alternate locations to reach destinations around Five Points Station.

Digital tactics:

- Website: Detour information will be available at itsmarta.com and more detailed project information will be available at fivepointstransformation.com.
- Trip Planning: Internal trip-planning tools will be updated, along with providing closure information to Google, Apple, Transit, and other third-party apps used by customers.
- Social Media: MARTA will leverage its primary platforms: Facebook, Instagram, X, NextDoor, and LinkedIn through regular posts, supported by paid campaigns.
- Email: MARTA will send frequent email updates to its entire Mailchimp audience, which currently has more than 160,000 customers and stakeholders.
- Paid Media: Besides paid social media posts for higher visibility, we are planning to place paid advertising on local TV and radio stations ahead of the closure.

- **Earned Media:** MARTA will host media briefings for news media and provide availability of MARTA leaders for interviews leading up to the closure.
- ***Impact to disadvantaged populations:*** We take seriously our obligation to provide efficient transportation to disadvantaged populations in the MARTA service area. We recognize that construction at Five Points station will cause temporary inconvenience for some customers, but it also will result in greatly improved service for the same customers well into the future. We are confident in our ability to directly communicate with the estimated 30 percent of Five Points Station customers who are affected by the temporary station entrance closure by aggressively canvassing customers on the bus routes and those entering and exiting the faregates to inform riders of route changes that will accommodate their trips.

A memorandum on bus connection at Five Points was prepared and is included in *Appendix C* of the EA that includes a summary of the affected riders:

- Six routes serve higher-than-average minority populations (3, 42, 49, 55, 186, and 813)
- Seven routes serve higher-than average populations in poverty (3, 26, 42, 49, 55, 186, and 813)
- Seven routes serve higher-than-average disability populations (3, 21, 42, 49, 55, 186, and 813)
- Nine routes serve populations with more-than-average zero-car households (3, 21, 26, 40, 42, 49, 55, 186, and 813)

The memo concludes that communities along these routes benefit from the time savings and access gains of having direct bus connections at Five Points station.

- ***Connected and cumulative actions:*** We acknowledge MARTA's Bus Network Redesign will be making changes to routes throughout the system. While this could result in changes to which routes directly serve the station, we do not anticipate any outcome that eliminates the need for bus transfers at Five Points or modifications to the number of bus bays at the station. It will remain an essential bus hub because it provides efficient transfers to all our rail lines.

It is our judgment that construction of MARTA Rapid Summerhill (Bus Rapid Transit) will not have a major effect on circulation downtown for pedestrians or motorists. This work will be limited to partial lane closures along MLK Jr. Drive, which is a full block south of Alabama Street. This will require installation of a BRT station in the north lane of MLK Jr. Drive at Broad Street and resurfacing of one lane that we do not believe would result in cumulative impacts that would alter any of the conclusions in the EA.

- ***Integration with Rapid Summerhill:*** Throughout the design process of both projects, we have recognized the important of ADA accessibility, clear sight lines, lighting, and wayfinding between Five Points rail station and the new Rapid station on MLK Jr. Drive. The design incorporates improvements to Alabama Street for pedestrian through traffic and aligns entrances to shorten the time and distance for customers making this transfer. We are ready and willing to partner with the City, CAP/ADID, and property owners to make further improvements to Broad Street to ensure a comfortable experience for our customers.

We thank you again for your organizations' close involvement in these important decisions and we feel that your engagement has resulted in a stronger project. We understand that a number of your preferences have not been satisfied with the design to date, but we believe we have balanced the needs of the Authority with the needs of stakeholders to the best of our ability. We look forward to a continued partnership on a compelling project for the future of Downtown Atlanta.

Regards,

DocuSigned by:

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Collie Greenwood
General Manager/CEO
MARTA
2424 Piedmont Rd. NE
Atlanta, GA 30324-3330

CC:

Dr. Yvette Taylor
Region IV Administrator
Federal Transit Administration
230 Peachtree Street, NW, Suite 1400
Atlanta, GA 30303

Enclosures:

Table 1: Conceptual Design Alternatives Considered During Prior Studies

Table 1: Conceptual Design Alternatives Considered During Prior Studies

Concept	Description	Design Elements & Operational Implications
1	Broad Street Extended with Double-loaded Bus Lanes	• Crossing required for interline transfer or if they came out of the station on the wrong side • Bus queuing takes up plaza area • Significant elevation difference between plaza and sloped new road towards the southern half of the site; ADA access requirements • Significant reduction in usable plaza space • Programmatic and space requirements leave no area for civic space • Breaks the potential for connecting Broad Street experience/environment from north to south • Potential TOD looks at bus station • Complicates access to light and air at concourse level • Prevents central iconic head house
1B	Elevated Plaza over Broad St Bus Plaza	
2	Broad Street Extended with Single Bus Lane	• Complex wayfinding across Forsyth site for interline transfer • Bus queuing takes up plaza area • Significant elevation difference between plaza and sloped new road towards the southern half of the site: ADA access required • Significant reduction in usable plaza space • Programmatic and space requirements leave no area for civic space • Breaks the potential for connecting Broad Street experience/environment from north to south • Potential TOD looks at bus station • Complicates access to light and air at concourse level • Prevents central iconic head house

Concept	Description	Design Elements & Operational Implications
3	Bus Bays on Alabama Street	- No street crossing required for passenger transferring between buses and bus to train - Consolidated bus shelter - Continuation of the lively and pedestrian Broad Street experience/environment from north to south - Clear line of sight for BRT connection from MLK, Jr. Drive - Maximizes central space opportunities - Potential TOD view is of civic space, not bus station - Minimal intervention with possibility for permanent bus station located over the CSX tracks (i.e. Initial Phase) Bus Option 3 Buses on Alabama Street - Idling bus sound and fumes may require addition of soft buffer zone - Bus stop spacing (particularly at the intersection of Alabama and Broad) to be widened to create a clean pedestrian connection south - Enhance Alabama Street experience from east to west
4	Bus Plaza over CSX Tracks	- Consolidated bus station - Ease of access to plaza - Street crossing not required for bus to train transfer - Maximizes central space opportunities - Clear connection to BRT on MLK, Jr. Drive - Continuation of the lively and pedestrian Broad Street experience/environment from north to south - Programming over new bus station (i.e. soccer pitch) - Utilize existing Alabama Street bus staging until CSX site development is completed - Complex construction over rail - Structural analysis for overbuild
4C	Integrated Parking CSX Bus Plaza	
5	On-Grade Bus Plaza at 143 Alabama (East Side)	- Existing headhouses removed - New centralized headhouse with new canopy, New plaza-level fare lines and elevator - Plaza includes recreational space, urban garden, and retail - New bus plaza at 143 Alabama on Forsyth with at-grade and below-ground connections to create transit complex
6	Underground Bus Terminal at 143 Alabama (West Side)	
7	Bus Plaza under Forsyth Street TOD	- West and Alabama Street headhouses removed, combined under Forsyth Street TOD - New plaza-level fare lines and elevator - Bus plaza located below New centralized headhouse on east plaza - Forsyth Street TOD. New plaza to include recreational space, urban garden, and retail

Concept	Description	Design Elements & Operational Implications
AFTER INITIAL REVIEW, BELOW CONCEPTS WERE DEVELOPED AT THE REQUEST OF COA.		
8A	Multimodal Broad Street (2 Headhouses)	• Plaza Space bifurcated and significantly reduced • Nominal area available for site activation • Intermodal transfer requires crossing new Broad Street; compromises pedestrian safety • Introduces multi-modal traffic on Alabama St; compromises pedestrian connectivity to BRT • Plaza opening is closed; smoke evacuation and natural ventilation / lighting may be impacted • Roadway slope reduces head height for a significant area of Concourse • Bus queuing compromises pedestrian connection from North to South Broad Street
8B	Multimodal Broad Street (1 Headhouse)	• Plaza Space bifurcated and significantly reduced/Severely limited area for site activation with the introduction of TOD • Intermodal transfer requires crossing new Broad Street; compromises pedestrian safety • Introduces multi-modal traffic on Alabama Street • Compromises pedestrian connectivity to BRT • Plaza opening is closed; smoke evacuation and natural ventilation / lighting may be impacted • Roadway slope reduces head height for a significant area of Concourse • Bus queuing compromises pedestrian connection from North to South Broad Street
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9C	Forsyth Street Split Operation	• Forsyth Street is reduced by 2 lanes to accommodate bus layby lane on both sides of Forsyth Street • Split operation on both sides of Forsyth • Complicates and compromises direct station access and wayfinding • Intermodal connection between buses staged on the west side of Forsyth and the trains is significantly compromised • Bus requires lane sharing with private vehicles • Use of west side of Forsyth Street requires coordination with private developer • Explore potential for bus operations only for Forsyth Street



Mr. Dan Corso
President, Atlanta Sports Council

Ms. Katie Kirkpatrick
President and CEO, Metro Atlanta Chamber
191 Peachtree Street NE, Suite 3400
Atlanta, GA 30303

March 21, 2024

Collie Greenwood
General Manager/CEO
MARTA
2424 Piedmont Rd. NE
Atlanta, GA 30324-3330

Dear Mr. Corso and Ms. Kirkpatrick:

Thank you for your thoughtful and detailed comments submitted in response to the draft Environmental Assessment (EA) for the Five Points Transformation project.

We strongly agree that the FIFA World Cup 2026 is a vitally important event to the region and we are excited for the opportunity to serve as the primary transportation mode for attendees from around the world.

To meet your request, we are working closely with our design and construction teams to phase work in such a way that Five Points station is functional, safe, and welcoming with street access during the 2026 events. We are committed to erecting surfaces around the ongoing construction work to for ingress/egress. Due to safety concerns we are committed to providing one street level access point. Safety structures for access will be aesthetically pleasing and allow for messaging to welcome our global visitors.

The current condition of the station, including the multiple sources of water intrusion, requires immediate action. If this work were to be deferred, a significant investment to chase leaks and mitigate water would be needed, and as stated in the EA documents, would not ensure longevity of the structure. In addition, MARTA was awarded a Rebuilding American Infrastructure with Sustainability and Equity (RAISE) grant from the Federal Transit Administration for the Five Points Transformation and has specific schedule requirements and commitments to progress the project in accordance with the program. As such, MARTA cannot postpone construction activities until after the World Cup events.

MARTA is committed to providing safe and reliable service during the World Cup and will continue to update the public and our partners on the progress of construction and information on using MARTA. We look forward to a productive partnership moving forward to ensure Atlanta presents its best face for the world at these events.

Regards,

DocuSigned by:

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Collie Greenwood
General Manager/CEO

CC:

Dr. Yvette Taylor
Region IV Administrator
Federal Transit Administration
230 Peachtree Street, NW, Suite 1400
Atlanta, GA 30303

APPENDIX C

MEMORANDUM OF AGREEMENT

January 2, 2024

Yvette G. Taylor
Regional Administrator
Federal Transit Administration
230 Peachtree Street NW, Suite 1400
Atlanta, Georgia 30303
Attn: J. Carrie Walker, Environmental Protection Specialist

**RE: Final Memorandum of Agreement
Rehabilitate Five Points MARTA Station, Atlanta
Fulton County, Georgia
HP-230328-006**

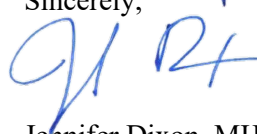
Dear Dr. Taylor:

The Historic Preservation Division (HPD) has received the final Memorandum of Agreement (MOA) for the above-referenced project. Our comments are offered to assist the Federal Transit Administration (FTA) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

HPD has reviewed the final MOA for the proposed project, which our office received December 6, 2023. HPD agrees that the stipulations proposed in the MOA are appropriate to address the adverse effect associated with this undertaking. Therefore, HPD is forwarding the signed agreement to your office for review and processing.

Please refer to project number **HP-230328-006** in any future correspondence regarding this project. If we may be of further assistance, please contact Stacy Rieke, Environmental Review Program Manager, at Stacy.Rieke@dca.ga.gov or (470) 522-7979.

Sincerely,



Jennifer Dixon, MHP, LEED Green Associate
Division Director
Deputy State Historic Preservation Officer

JAD/smr

cc: Mollie Bogle, Atlanta Regional Commission
Tracie Sanchez, DCA Regional Services, Region 3

**MEMORANDUM OF AGREEMENT
AMONG
FEDERAL TRANSIT ADMINISTRATION,
METROPOLITAN ATLANTA REGIONAL TRANSIT AUTHORITY,
AND
GEORGIA STATE HISTORIC PRESERVATION OFFICER
FOR
MARTA FIVE POINTS TRANSFORMATION PROJECT
FULTON COUNTY, GEORGIA
HP-230328-006**

WHEREAS, the Federal Transit Administration (FTA) plans to fund the Metropolitan Atlanta Regional Transit Authority (MARTA) Five Points Transformation Project in Fulton County, Georgia (undertaking) and FTA has determined that the undertaking will affect a property eligible for listing on the National Register of Historic Places (NRHP) and is therefore subject to Section 106 of the National Historic Preservation Act (NHPA) pursuant to 36 CFR § 800 regulations implementing Section 106 of the NHPA (54 U.S.C. § 306108); and

WHEREAS, the undertaking consists of demolishing, redesigning, and constructing a new canopy, reconfiguring/redesigning the plaza at the street level areas, adding retail and vendor frontages throughout the interior of the station, and constructing a bus loading area at the Five Points MARTA Station located at 30 Alabama Street SW in Atlanta (Property); and

WHEREAS, FTA has defined the undertaking's area of potential effect (APE) as consisting of the Five Points MARTA Station, immediately adjacent properties, and viewshed considerations; and

WHEREAS, FTA has determined the undertaking will have an adverse effect upon the Five Points MARTA Station, which is eligible for inclusion in the NRHP under Criterion A in the areas of Community Planning and Development, Engineering, and Transportation and Criterion C in the area of Architecture and under Criteria Consideration G: Properties That Have Achieved Significance Within the Last Fifty Years, in consultation with the Georgia State Historic Preservation Office (GA SHPO), pursuant to 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act (54 U.S.C. §306108); and

WHEREAS, MARTA is a consulting party as an applicant for federal permit and/or assistance and is therefore an invited signatory, pursuant to 36 CFR § 800.2(c)(4); and

WHEREAS, FTA has consulted with the Eastern Band of Cherokee Indians, and the tribe has not requested to enter into this agreement as an invited signatory/concurring party; and

WHEREAS, FTA notified the City of Atlanta Urban Design Commission, Georgia Trust for Historic Preservation, Atlanta Downtown Neighborhood Association, Neighborhood Planning Unit M, Central Atlanta Progress/ADID, Invest Atlanta, Atlanta Preservation Center and CSX regarding the nature of the undertaking and informed those entities of our efforts to identify historic properties and were invited to participate in the Section 106 process. As a result of these efforts, City of Atlanta Urban Design Commission, Georgia Trust for Historic Preservation, Atlanta Downtown Neighborhood Association, Neighborhood Planning Unit M, Central Atlanta Progress/ADID, Invest Atlanta, Atlanta Preservation Center and CSX were consulted as part of the Section 106 process; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), FTA has notified the Advisory Council on Historic Preservation (Council) of its adverse effect determination with specified documentation, and the Council has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii);

NOW, THEREFORE, the FTA, MARTA, and the GA SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on the Property.

STIPULATIONS

The FTA will ensure the following measures are carried out by a professional meeting the applicable Secretary of Interior's Qualifications Standards:

I. MITIGATION

A. Architectural Documentation

- a. Prior to authorizing any demolition or other activity that could damage any building, structure or landscape, MARTA will ensure that the Property is documented in accordance with the standards and guidelines of the Historic American Buildings Survey (HABS) for Level II Documentation (www.nps.gov/hdp/standards/index.htm). Unless otherwise agreed to by the NPS and the GA SHPO, MARTA will ensure that all documentation is completed and accepted in writing by the NPS and GA SHPO prior to demolition.
- b. MARTA will provide NPS and GA SHPO a copy of the Draft HABS II documentation for review and comment. MARTA will submit Final HABS II documentation to the NPS in accordance with requirements in the Secretary of the Interior's Guidelines for Architectural and Engineering Documentation (Federal Register, Vol. 68, No. 139, pp. 43159-43162, July 21, 2003). Once completed and accepted by NPS, the documentation will be placed in the Historic American Buildings Survey/Historic American Engineering Record/Historic American Landscapes Survey Collection at the Library of Congress where it will be available to the public.
- c. The GA SHPO and the FTA will also receive a copy of the final documentation for their files.
- d. HABS documentation for the Property to be demolished or altered will include, but is not limited to:
 - i. The written historical and descriptive data prepared in accordance with outline format guidelines
 - ii. A site plan
 - iii. Digital reproduction of select existing drawings.
 - iv. Photographic reproductions of select historical views.
 - v. Large-format (4" x 5" or larger size) photographs processed for archival permanence in accordance with HABS photographic specifications (www.nps.gov/hdp/standards/photoguidelines.pdf). Views will include:
 1. At least one exterior view that shows the resource in context.
 2. One photograph of each exterior façade of each building or 2 exterior oblique views that capture all facades.
 3. An interior view of each major space.
 - vi. At least one color digital photograph of each resource and its setting. The digital format should meet the NPS NRHP's 75-year permanence standard and higher resolution digital files (www.nps.gov/NR/PUBLICATIONS/bulletins/photopolicy/index.htm).
 - vii. Photo locations keyed to the site plan and included with the "Index to Photographs."

B. Interpretive Panel

- a. MARTA will develop and install two interpretive signs/panels regarding Five Points MARTA Station to be installed at 30 Alabama Street, SW, Atlanta, Georgia. The purpose of the first

sign is to inform the public about Five Points MARTA Station and its construction and development, and to provide historic context as one of the first public transit stations in Atlanta and southeast. The purpose of the second sign is to provide context about the history of the surrounding area, and shall include, at a minimum, both a narrative and images. The interpretive signs shall be developed utilizing primary and secondary sources and images. Each sign/panel will measure 48 inches wide, will be 36 inches high, and will be installed on a wall in the interior of the Five Points MARTA Station.

- b. A draft of the interpretive signs, including proposed images and citations, will be submitted to GA SHPO for review and comment. MARTA or its assignee, will respond to GA SHPO comments regarding the draft narrative. Once the draft sign has been reviewed, MARTA will produce and install the interpretive signs/panels at the above-noted location. Once installed, photographic documentation of the installed signs will be provided to GA SHPO.

II. DURATION

This Memorandum of Agreement (MOA) will expire if its terms are not carried out within seven (7) years from the date of its execution. Prior to such time, FTA may consult with the other signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation VI below.

III. POST-REVIEW DISCOVERIES

If potential historic properties are discovered or unanticipated effects on historic properties found during project construction, and specifically, should human remains be found during data recovery or construction, all work shall stop immediately and MARTA shall contact FTA, GA SHPO, the Office of the State Archaeologist, and federally-recognized Tribal Historic Preservation Officers (THPOs), if the remains are potentially American Indian. MARTA will implement a discovery plan in accordance with applicable state and federal laws (36 CFR Part 800.13; 43 CFR Part 10, Subpart B; Official Code of Georgia (OCGA) 36-72; OCGA 44-12-260, OCGA 31-21-6) in consultation with GA SHPO, the Office of the State Archaeologist, and THPOs, as applicable.

IV. MONITORING AND REPORTING

Annually, following the execution of this MOA until it expires, is completed, or is terminated, MARTA will provide all parties to this MOA a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in FTA's efforts to carry out the terms of this MOA.

V. DISPUTE RESOLUTION

Should any signatory or concurring party to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, FTA shall consult with such party to resolve the objection. If FTA determines that such objection cannot be resolved, FTA will do the following:

A. Forward all documentation relevant to the dispute, including FTA's proposed resolution, to the Council. The Council shall provide FTA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, FTA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the Council, signatories, and concurring parties, and provide them with a copy of this written response. FTA will then proceed according to its final decision.

B. If the Council does not provide its advice regarding the dispute within the thirty (30) day time period, FTA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, FTA shall prepare a written response that takes into account any timely

comments regarding the dispute from the signatories and concurring parties to the MOA and provide them and the Council with a copy of such written response.

C. FTA's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

VI. AMENDMENTS

This MOA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the Council.

VII. TERMINATION

If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other signatories to attempt to develop an amendment per Stipulation VI above. If within thirty (30) days an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.

Once the MOA is terminated, and prior to work continuing on the undertaking, FTA must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the Council under 36 CFR § 800.7. FTA shall notify the signatories as to the course of action it will pursue.

Execution of this MOA by the FTA, MARTA, and the GA SHPO, its subsequent filing with the Council, and implementation of its terms, is evidence that FTA has taken into account the effects of the undertaking on historic properties and afforded the Council an opportunity to comment.

X. EXECUTION OF AGREEMENT IN COUNTERPARTS

This MOA may be executed in counterparts with a separate page for each signatory. FTA will ensure that each party is provided a copy of the fully executed agreement.

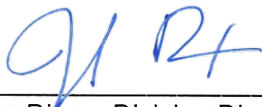
SIGNATORY

FEDERAL TRANSIT ADMINISTRATION

BY: Yvette G. Taylor DATE: 1-9-2024
Yvette G. Taylor, Ph.D., Regional Administrator for Region 4

SIGNATORY

GEORGIA STATE HISTORIC PRESERVATION OFFICER

BY: 

Jennifer Dixon, Division Director, Deputy SHPO

DATE: January 2, 2024

INVITED SIGNATORY

METROPOLITAN ATLANTA REGIONAL TRANSIT AUTHORITY

BY:  DATE: Dec. 4, 2023

Collie Greenwood, General Manager/Chief Executive Officer

APPENDIX D

AGENCY CORRESPONDENCE



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION IV
Alabama, Florida, Georgia,
Kentucky, Mississippi,
North Carolina, Puerto
Rico, South Carolina,
Tennessee, Virgin Islands

230 Peachtree St.,
N.W., Suite 1400
Atlanta, GA 30303
404-865-5600

November 29, 2023

Director Stephen Tryon
Office of Environmental Policy and Compliance
U.S. Department of the Interior
1849 C Street, NW MS 2629
Washington, DC 20240

Dear Director Tryon:

The Federal Transit Administration (FTA) is submitting a Draft Section 4(f) Evaluation for the Metropolitan Atlanta Rapid Transit Authority's (MARTA) Five Points Transformation project in Fulton County, Georgia. The preferred alternative will demolish the existing station canopy, construct a new canopy, and demolish and redesign the plaza area entirely within the same geographic footprint of the existing plaza. The Project will improve and modernize the station by opening the plaza slab beneath a new, larger canopy designed to avoid pooling of water and the resulting leaking experienced today, and to maximize access to daylight and air at the plaza and concourse levels. The new design will emphasize visual and physical connections to create a safe, efficient, and spatially captivating station experience. The preferred alternative will result in a Section 4(f) use of Five Points Station.

For your use, the FTA is providing an electronic copy of the Draft Section 4(f) Evaluation. Please follow the instructions in our accompanying email to download the document.

Please review and comment as required by 23 CFR 774.5. In keeping with the requirements of 23 CFR 774.5, we would appreciate your response within 45 days from receipt of this letter. If you have any questions or require additional information, please contact Julia Carrie Walker, of my staff, at (404) 865-5646 or julia.walker@dot.gov.

Sincerely,

Yvette G. Taylor, PhD
Regional Administrator
Federal Transit Administration – Region IV



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
100 Alabama Street SW, 1924 Building
Atlanta, GA 30303

January 17, 2024

IN REPLY REFER TO:

ER 23/0514

Yvette G. Taylor, PhD
Regional Administrator
Federal Transit Administration
230 Peachtree Street
NW, Suite 1400
Atlanta, Georgia 30303

Re: Comments and Recommendations on the Draft Section 4(f) Evaluation for the
Metropolitan Atlanta Rapid Transit Authority's (MARTA) Five Points Transformation
project in Fulton County, Georgia - Amended

Dear Dr. Taylor:

The U.S. Department of the Interior (Department) has reviewed the draft Section 4(f) evaluation for the Metropolitan Atlanta Rapid Transit Authority's (MARTA) Five Points Transformation project in Fulton County, Georgia.

We welcome this opportunity to cooperate with the Federal Transit Administration (FTA) in evaluating the proposed demolition and reconstruction of the existing station canopy and to demolish and redesign the plaza entirely within the same geographic footprint of the existing plaza in Atlanta, Georgia. As detailed in the draft Section 4(f) evaluation, the purpose of the proposed project is to improve and modernize the station by opening the plaza slab beneath a new, larger canopy designed to avoid leaking and pooling of water, and to maximize access to daylight and air at the plaza and concourse levels. We offer the following comments and recommendations for your consideration.

Section 4(f) Comments

The draft Section 4(f) evaluation describes a range of avoidance alternatives, the affected Section 4(f) resources, and discloses potential project impacts to those resources.

The draft Section 4(f) evaluation identified five National Register of Historic Places (NRHP) eligible listings in the undertaking's area of potential effect (APE) in consultation with the Georgia State Historic Preservation Office (SHPO). They are the Atlanta Constitution Building, First National Bank Building, Five Points Station, Rich's Department Store and the Underground Atlanta Historic District. A finding of adverse effect was found for the Five Points Station. Findings of no adverse effect were found for the other four properties. The evaluation notes that the SHPO has concurred with these findings.

The draft Section 4(f) evaluation discusses an ongoing coordination effort with the SHPO in compliance with Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108), as amended, and codified in its implementing regulations, 36 CFR §800, as amended (August 5, 2004) to resolve the adverse effects through a Memorandum of Agreement (MOA). The MOA is an agreement document that sets out measures to resolve the adverse effects through mitigation measures. Although the draft Section 4(f) evaluation noted there is a draft MOA included with the project's environmental assessment, a copy of the draft MOA was not provided with the draft Section 4(f) evaluation. On January 16, 2024, an executed MOA (HP-230328-006) was provided to the Department. A mitigated finding of adverse effect was found for the Five Points MARTA Station. The FTA, MARTA, and the GA SHPO agree that the undertaking shall be implemented in accordance with the stipulations in the MOA.

Summary Comments

Based on this updated information, the Department has no objection to Section 4(f) approval of this project.

The Department has a continuing interest in working with the Federal Transit Administration to ensure that impacts to resources of concern to the Department are adequately addressed. If you have questions regarding National Park Service interests, please contact Sabrina Henry at sabrina_henry@nps.gov. I can be reached at (404) 852-5414 or via email at joyce_stanley@ios.doi.gov.

Sincerely,

JOYCE

STANLEY

Digitally signed by

JOYCE STANLEY

Date: 2024.01.17

09:47:40 -05'00'

Joyce Stanley, Ph.D.

Regional Environmental Officer

cc: Christine Willis - FWS
Jon Janowicz - USGS
Sabrina Henry - NPS
OEPC – WASH

October 4, 2023

Yvette G. Taylor
Regional Administrator
Federal Transit Administration
230 Peachtree Street NW, Suite 1400
Atlanta, Georgia 30303
Attn: J. Carrie Walker, Environmental Protection Specialist

**RE: Rehabilitate Five Points MARTA Station, Atlanta
 Fulton County, Georgia
 HP-230328-006**

Dear Dr. Taylor:

The Historic Preservation Division (HPD) has received the additional information submitted concerning the above referenced project, including the report entitled, *Historic Resources Assessment of Effects (AOE) Fulton County Metropolitan Atlanta Rapid Transit Authority (MARTA) Five Points Transformation*, prepared by WSP Environmental Consultants and dated July 21, 2023. Our comments are offered to assist the Federal Transit Administration (FTA) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of rehabilitating the circa (ca.) 1979 MARTA Five Points Station located at 30 Alabama Street, SW in Atlanta, including demolishing the existing masonry station canopy and rebuilding it in a transparent, arched, timber-supported design, reconfiguring and redesigning the plaza level/area in the same general footprint to include a flex soccer field, community garden, outdoor seating, terrace, and café, enlarging the exposure of the concourse level of the station to the plaza level, demolishing existing curbs and constructing a bus loading area in a “sawtooth design” along Alabama and Forsyth Streets, adding retail vendor frontages in multiple locations throughout the interior of the station, painting murals in unknown locations, and cleaning the Eiseman façade utilizing unknown methods. It was previously determined that the MARTA Five Points Station, noted as Resource 1 in the above-referenced report, is eligible for listing in the National Register of Historic Places (NRHP), meeting NRHP Criterion Consideration G for exceptional significance under NRHP Criterion A in the areas of Community Planning and Development, Engineering, and Transportation and Criterion C in the area of Architecture, with a state level of significance, as noted in our letter dated April 27, 2023.

The current submitted information includes the above-referenced AOE report, including additional NRHP-eligibility determinations. Based on the information provided regarding eligibility and desktop research, HPD concurs that Resource 3/19 Forsyth Street SW is not eligible for listing in the NRHP. Additionally, HPD concurs that Resources 2/Atlanta Constitution Building/143 Alabama Street SW, 7/1 Peachtree Street SW, and 8/First National Bank Building/2 Peachtree Street SW are eligible for listing in the NRHP and within the proposed project’s area of potential effect (APE). Regarding Resources 4/Rich’s Department Store/41 Broad Street NW, 5/55 Peachtree Street SW, and 6/54 Peachtree Street SW, HPD finds they are within the NRHP-listed Whitehall Street Retail Historic District, which is also within the proposed project’s APE and was not noted in the report. Furthermore, HPD concurs that the NRHP-listed Underground Atlanta Historic District, noted as Resource 9 in the report, is also within the proposed project’s APE.

Regarding the assessment of effects, HPD concurs that the proposed project will have **no adverse effect** on Resources 2, 7 and 8 and the Underground Atlanta Historic District, and finds that it will have **no adverse effect** on the Whitehall Street Retail Historic District, as defined in 36 CFR Part 800.5(d)(1). Additionally, HPD concurs that the proposed project will have an **adverse effect** on the NRHP-eligible MARTA Five Points Station, as defined in 36 CFR Part 800.5(a)(2). Specifically, the demolition and incompatible redesign of character defining features of the NRHP-eligible property and the construction of incompatible new elements is not consistent with the Secretary of the Interior's *Standards for the Treatment of Historic Properties*.

HPD would like to note that this determination of an adverse effect is not the end of the Section 106 consultation process and that the process should be completed prior to commencing the project. The next step in the process is to consider options to avoid or minimize the adverse effect on historic resources associated with this project. If the scope of work (SOW) for this project can be changed so that it conforms to the Secretary's *Standards* (i.e., repair rather than replace intact historic elements, documentation of damage beyond repair, replacement component specifications, location/site changes, vegetative buffer, etc.), forward the updated SOW to HPD for review and comment. If the SOW cannot be changed, provide HPD with documentation explaining the reason(s) why the adverse effect cannot be avoided or minimized (i.e., a cost analysis, funding requirements, etc.).

If the adverse effect remains after avoidance/minimization options have been considered, please complete the following steps, as applicable to this project, to resolve the adverse effect, complete the consultation process, and continue with the project:

- Notify the Advisory Council on Historic Preservation (ACHP): the ACHP must be notified of the adverse effect determination; the federal agency should utilize the ACHP's e-notification system available here: <https://www.achp.gov/e106-email-form>; ACHP notification is separate from the ongoing Section 106 consultation with HPD on this project and can be accomplished concurrently with the next step.
- Determine Mitigation: mitigation is measures that ensure a local preservation benefit, despite the loss or damage to historic properties and can include a variety of components; in consultation with HPD and other consulting parties, the federal agency should determine appropriate mitigation measures and incorporate those measures as stipulations in a draft Memorandum of Agreement (MOA).
- Draft a MOA: a MOA is an agreement document that sets out measures to resolve the adverse effect through mitigation; the federal agency should visit the ACHP's *Guidance on Agreement Documents* webpage, found here: <https://www.achp.gov/initiatives/guidance-agreement-documents> and utilize the MOA template found therein.
- Provide the MOA Draft(s) to HPD for Review: all agreement document drafts are subject to a 30-day review period that begins upon receipt of the document; HPD recommends the agency utilize a similar 30-day period to provide responsive revisions for each draft to HPD to reduce the length of time it takes to finalize the document.

Once appropriate mitigation to resolve the adverse effect is determined, in consultation with all parties, and the MOA has been executed (signed by all parties), the project can commence provided the need for the subject property to accomplish the mitigation outlined in the MOA is complete. If the agency decides

additional discussion of the project or the provided comments is warranted, HPD is available for further technical assistance consultation.

We look forward to working with you as this project progresses. Please refer to project number **HP-230328-006** in any future correspondence regarding this project. If we may be of further assistance, please contact Olivia Kendrick, Environmental Review Historian, at Olivia.Kendrick@dca.ga.gov or (404) 486-6425.

Sincerely, ,



Jennifer Dixon, MHP, LEED Green Associate
Division Director
Deputy State Historic Preservation Officer

JAD/olk

cc: Mollie Bogle, Atlanta Regional Commission
Tracie Sanchez, DCA Regional Services, Region 3

April 27, 2023

Yvette G. Taylor, PhD
Regional Administrator
Federal Transit Administration
230 Peachtree Street NW, Suite 1400
Atlanta, Georgia 30303
Attn: J. Carrie Walker

**RE: Eligibility Determination, Five Points MARTA Station, Atlanta
Fulton County, Georgia
HP-230328-006**

Dear Dr. Taylor:

The Historic Preservation Division (HPD) has received the documentation regarding the above-referenced project, including the report entitled, *Five Points Station, Metropolitan Atlanta Rapid Transit Authority (MARTA)*, prepared by WSP and dated March 15, 2023. Our comments are offered to assist the Federal Transit Administration (FTA) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended.

Based on the information provided in the above-reference report and additional research, including a review of *Modern Downtown Atlanta* (Sullivan and Sims-Alvarado, 2018) and the accompanying National Register of Historic Places (NRHP) Multiple Property Documentation Form *Modern Downtown Atlanta, 1945-1990* (MPDF), the NRHP nomination for the Whitehall Street Retail Historic District (2020), and the NRHP nomination for the Underground Atlanta Historic District (1980), HPD is unable to concur with FTA's NRHP-eligibility determination for the Metropolitan Atlanta Transit Authority (MARTA) Five Points Station located at 30 Alabama Street, SW in Atlanta.

As noted in the references above, MARTA was the first transit system in the southeastern United States and the first in the Southeast to utilize federal funding associated with the Urban Mass Transportation Act. While not the first station constructed in the MARTA system, the Five Points station was constructed within the system's first phase of development and was constructed, and currently serves, as a main transfer station and the only hub station for all MARTA lines. The development of MARTA remains the largest public works project in Atlanta's history and one of the largest in the Southeast since the 1930s.

As noted in the MPDF, MARTA Rail Stations are expressions of Modern-era architecture and engineering in Atlanta with the construction and functional aesthetic relying on the construction materials and methods that defined the period. Additionally, all stations, including Five Points, were designed by significant, known Modern architects and engineers. Although the station did not inspire further development of buildings featuring Brutalistic architecture in the City of Atlanta, the station's unique design and place within its geography underscores its significance. Additionally, while the system itself is significant in engineering as the first of its kind in the Southeast to introduce a new transportation technology, the Five Points Station also met complex design challenges as the central hub serving all train lines, which exceeds the design and engineering requirements of other stations and further underscores its exceptional significance.

Furthermore, the significance of a resource under Criterion Consideration G, according to NRHP Bulletin #15, does not imply only a *positive* impact. As noted in the nominations above, the construction of the Five Points station had a tremendous *negative* impact on the Downtown Atlanta area. First, through the demolition of a significant amount of historic architectural resources and second, by significantly shifting the focus of downtown away from the Hotel Row and Terminal Station areas of Atlanta when the bus routes were rerouted, effectively killing the economic basis for the long-established retail district. Third, the station construction led to the drastic decline of surrounding property values and, to this day, impacts the viability of Underground Atlanta as an entertainment area.

Therefore, based on the information provided in the above references, the Five Points MARTA Station meets NRHP Criterion Consideration G for exceptional significance under NRHP Criteria A and C in the areas of Architecture, Community Planning and Development, Engineering, and Transportation with a local and state level of significance.

Please refer to project number **HP-230328-006** in any future correspondence regarding this project. If we may be of further assistance, please do not hesitate to contact Michelle Bard, Environmental Review Historian, at Michelle.Bard@dca.ga.gov or (770) 212-4888.

Sincerely,

A handwritten signature in blue ink, appearing to read "Stacy Rieke".

Stacy Rieke, MHP
Program Manager
Environmental Review & Preservation Planning

SMR/mlb

cc: Holly Vine, Atlanta Regional Commission
Tracie Sanchez, DCA Regional Services, Region 3