



**BELTLINE CORRIDOR ENVIRONMENTAL STUDY**

**BeltLine Corridor Northeast Zone  
FINAL DECISION DOCUMENT –  
GEORGIA ENVIRONMENTAL POLICY ACT**

**Prepared for:**

**Metropolitan Atlanta Rapid Transit Authority  
and  
Atlanta BeltLine, Inc.**

**Prepared by:**

**AECOM/JJG Joint Venture  
Atlanta, GA**

**August 2009**

**General Planning Consultant Services RFP P5413  
Contract No. 200703566  
Work Order No. 2008-07**

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## **1.0 INTRODUCTION**

This Final Decision Document is prepared in accordance with the Georgia Environmental Policy Act of 1991, (GEPA). This document details the joint decision by the Metropolitan Atlanta Rapid Transit Authority (MARTA) and the Atlanta Development Authority (ADA) on the proposed construction of rail transit, multi-use trails, and ancillary facilities in the Northeast Zone of the BeltLine Corridor, between the existing Inman Park/Reynoldstown and Lindbergh Center MARTA stations. This decision follows the preparation and public review of an Environmental Effects Report (EER) in May 2009 for this proposed action.

The Atlanta Development Authority, a public body corporate of the State of Georgia, registered annually under the state's Local Government Authorities Act (O.C.G.A 36-80-16), is the Redevelopment Agent for the BeltLine Tax Allocation District; it created Atlanta BeltLine, Inc. (ABI) to implement the BeltLine Project. ADA involvement with respect to the proposed action will be delivered through ABI.

### **1.1 Project Name, County**

The BeltLine Corridor Northeast Zone is in Fulton County, Georgia. Figure 1-1 depicts the BeltLine Corridor, while Figure 1-2 represents the Northeast Zone, which is the study area for the GEPA assessment.

#### **1.1.1 Facility Type**

- Existing – None
- Proposed – The proposed project involves construction of a new fixed rail transit guideway and multi-use trails.

#### **1.1.2 Termini**

The Northeast Zone of the BeltLine Corridor begins at the Inman Park/Reynoldstown MARTA station, extends west via DeKalb Avenue NE to the right-of-way (ROW) presently owned by the ADA, then north via ADA ROW to the Armour Drive industrial district and the Lindbergh Center MARTA station at Lindbergh Drive NE. The Northeast Zone is approximately 6.5 miles long.

## **1.2 Alternatives Considered**

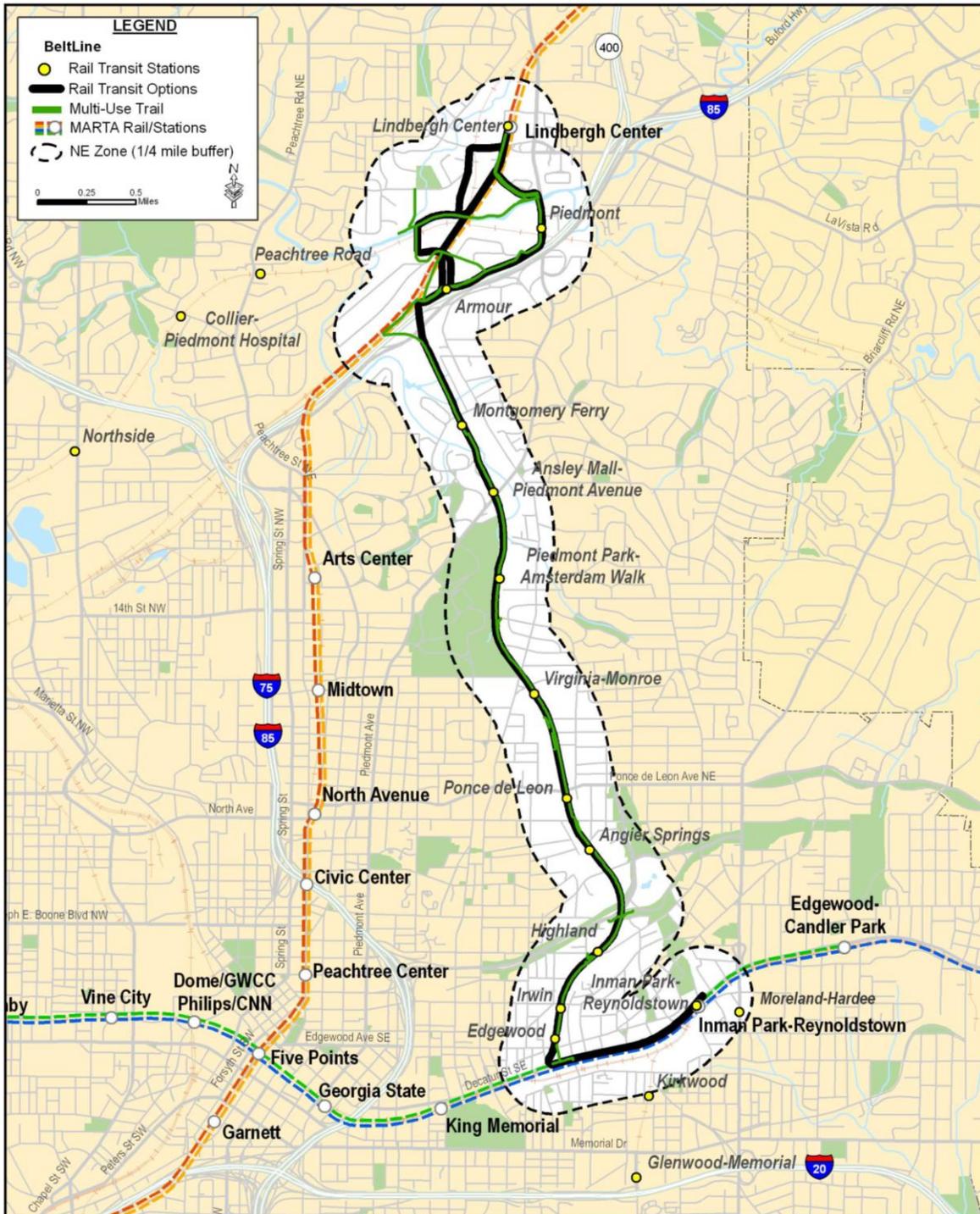
### **1.2.1 Build Alternatives**

The proposed Build Alternative includes a combination of a new Light Rail/Modern Streetcar transit line and new multi-use trails. The conceptual rail transit guideway includes electrically powered vehicles, overhead wires to deliver the power to the vehicles, stations with platforms to accommodate waiting passengers, and access from the stations to adjacent streets, sidewalks, and pedestrian facilities.

Multi-use trails are pathways shared by pedestrians, pet walkers, skaters, wheelchair users, joggers, bicyclists, and other users who do not rely on conventional motorized



Figure 1-2: Northeast Zone Study Area



vehicles for mobility and passive or active recreation. An open space or barrier physically separates a typical pathway from motorized vehicular traffic. Multi-use trails in the Northeast Zone would create a linear park with connections to other parks and recreational areas. Together, the transit service and the trail system would connect neighborhoods in the Northeast Zone with the broader pedestrian and bicycle network for the Atlanta metropolitan area.

South of Interstate 85 (I-85) is a single Build Alternative alignment for transit and a single Build Alternative alignment for multi-use trails, generally within the existing ADA ROW and along DeKalb Avenue NE to the Inman Park/Reynoldstown MARTA station. North of I-85, the Build Alternative includes three sets of transit and multi-use trail alignment options for consideration (Figure 1-3 through Figure 1-5), each connecting to the Lindbergh Center MARTA station.

Option 1 (Figure 1-3) accesses the Lindbergh Center MARTA station via an area west of the MARTA North-South heavy rail line. Option 2 (Figure 1-4) accesses the Lindbergh Center MARTA station via Piedmont Road NE, east of the MARTA heavy rail line. Option 3 (Figure 1-5) provides transit access that is more direct to the Lindbergh Center MARTA station, using more elevated guideway and less in-street right-of-way.

The transit alignment in each option extends north of the Atlanta Development Authority ROW and beneath I-85 to a point south of Mayson Street NE and west of Plasters Avenue NE. Each option also concludes at the Lindbergh Center MARTA station north of Lindbergh Drive NE via Garson Drive NE. Each option includes a rail connection to an approximate 11-acre proposed maintenance facility for the BeltLine, bounded to the south by Armour Drive NE, to the north and west by the existing MARTA Armour Yard, and to the east by Plasters Avenue NE.

Each multi-use trail option corresponds with the transit option of similar number, although the trail and transit alignments within each option are not necessarily adjacent. Each trail option extends north of the Atlanta Development Authority ROW and beneath I-85 to a point along Mayson Street NE parallel to Norfolk Southern railroad, continuing north, then east along Mayson Street NE to a point east of and beneath the MARTA heavy rail bridge. Each option also includes a multi-use trail along the northern edge of Peachtree Creek, with connections to Peachtree Hills Avenue NE via the western boundary of the Garden Brook at Peachtree Hills condominiums property. Each trail option connects to the Lindbergh Center MARTA station via Piedmont Road NE and Garson Drive NE.

### **1.2.2 No Build Alternative**

Under this alternative, MARTA and ABI would take no action to construct the project. The No Build Alternative includes the existing transportation system throughout the corridor study area and the Atlanta region. The No Build Alternative also includes all of the proposed projects listed in the Atlanta Regional Commission (ARC) Transportation Improvement Program (FY 2008-2013) and within the cost-constrained *Envision6* Regional Transportation Plan (FY 2008-2030), excluding the BeltLine transit and multi-use trails.

Figure 1-3: Transit/Trails Option 1 and Transit Option 1A

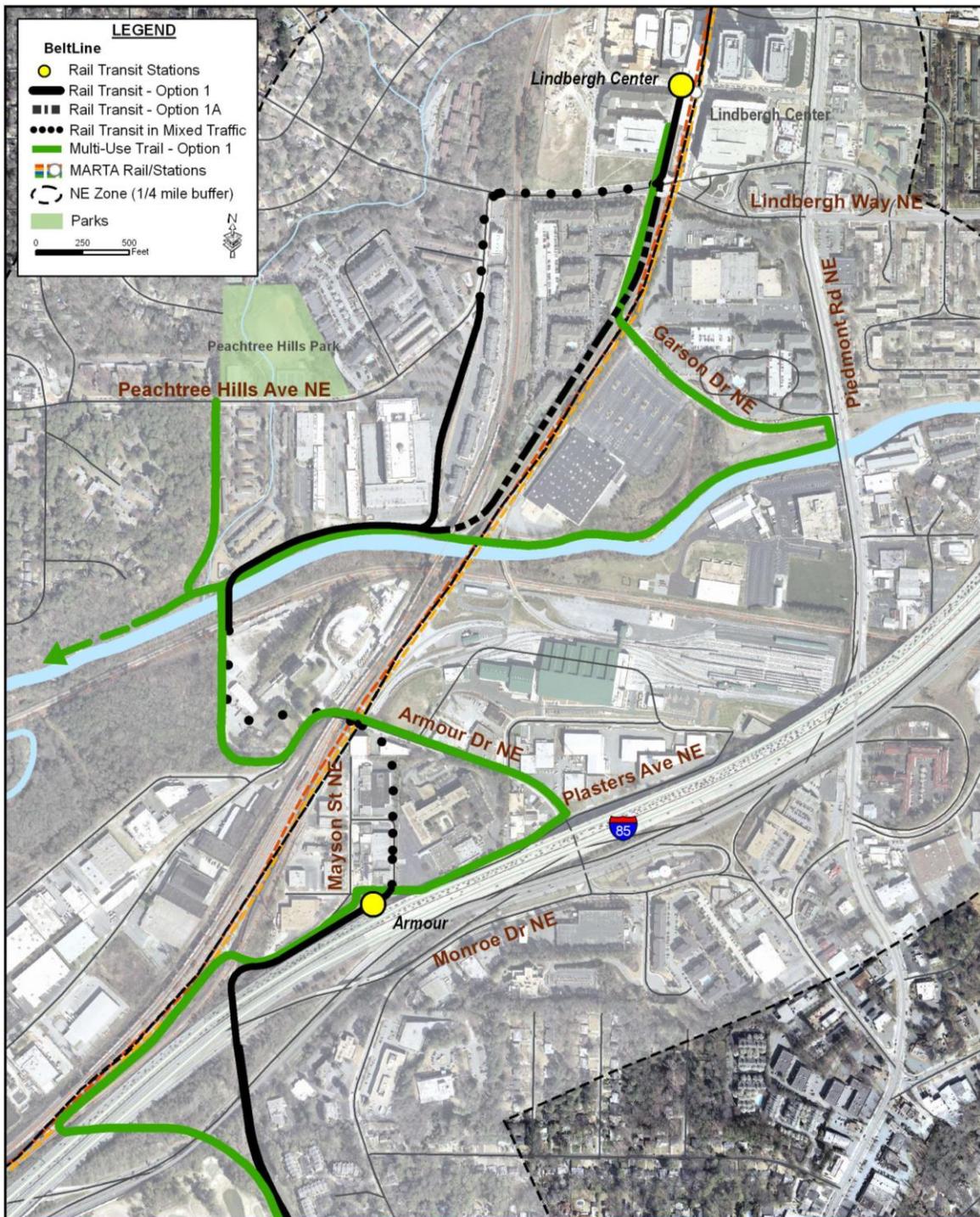


Figure 1-4: Transit/Trails Option 2

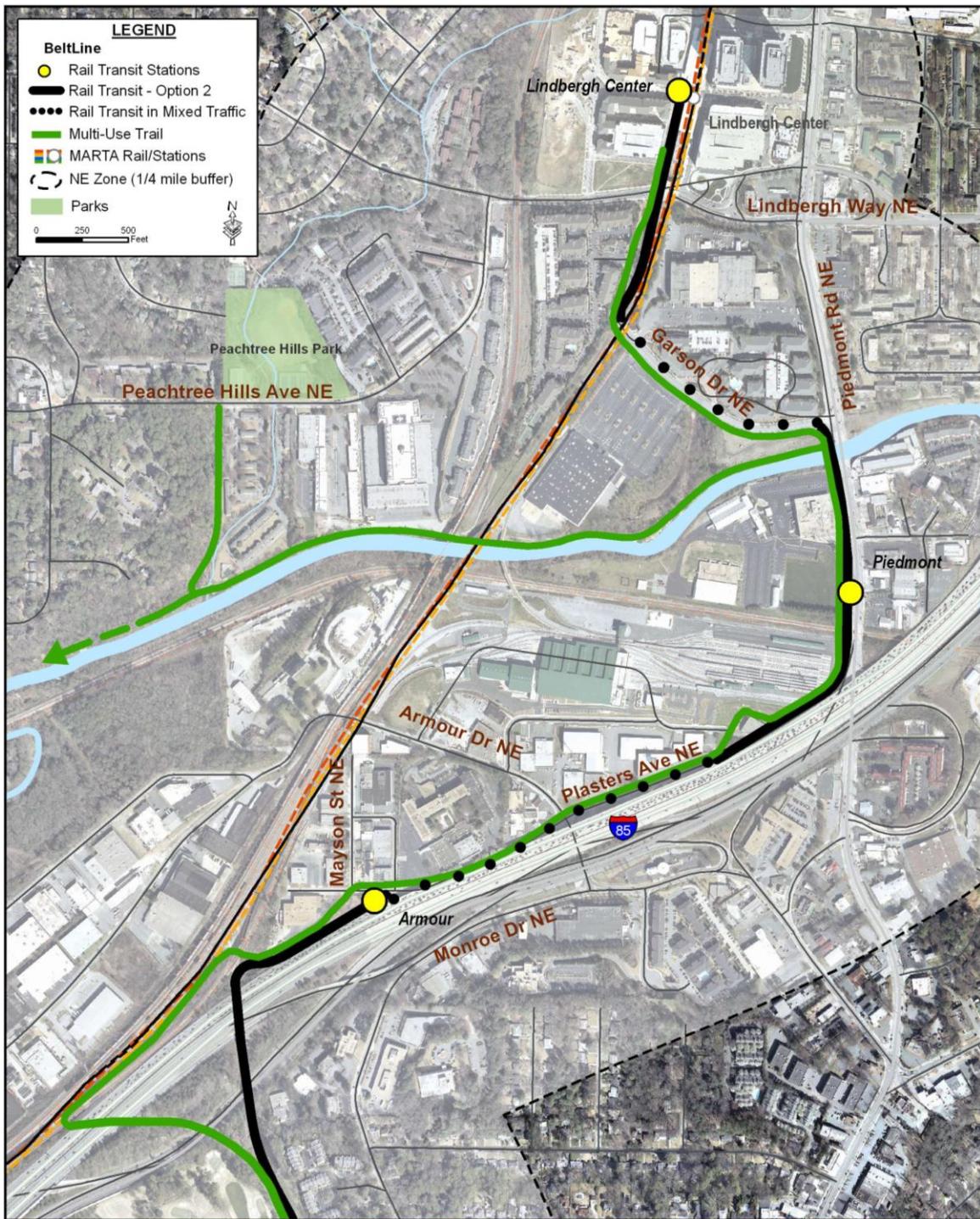
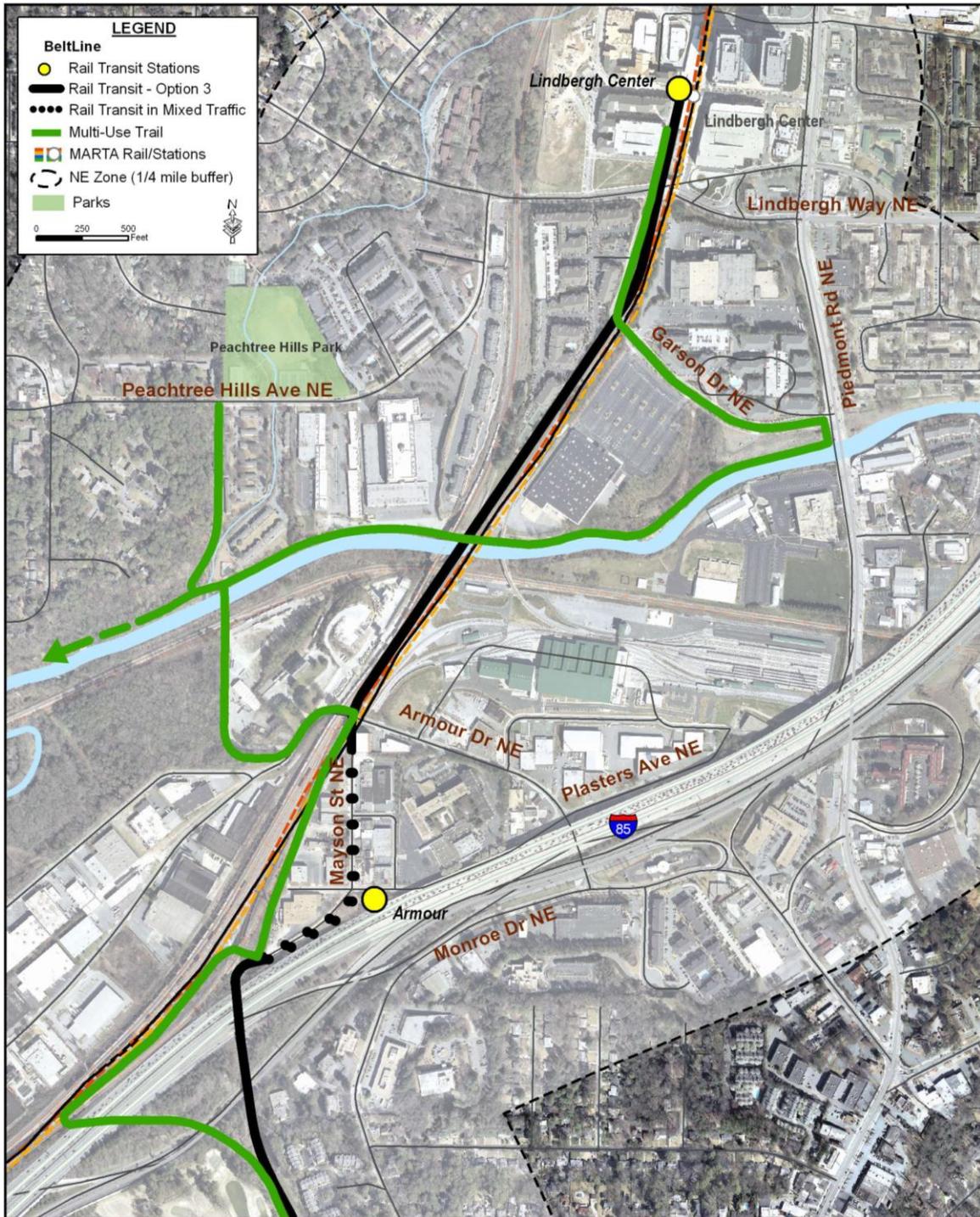


Figure 1-5: Transit/Trails Option 3



### 1.2.3 Alternatives to Avoid Significant Adverse Effect

The No Build Alternative represents the alternative for avoiding significant adverse effects.

## 1.3 Environmental Effects

Table 1-1 provides the standard GEPA checklist of environmental effects resulting from the Build Alternative. The checklist indicates identified potential effects and their relative severity, inclusive of all Northeast Zone alignment and technology options.

**Table 1-1: GEPA Environmental Checklist**

GEORGIA AREA/CATEGORY	IS AREA AFFECTED?		HOW SEVERE?		
	Yes	No	N/A	Minor	Major
1.Wetlands/Waters of the U.S. and State	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.Floodplains	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3.Water Supply	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.Water Resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.Groundwater Recharge Area	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.Storm Water	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7.Waste Water	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8.Air Quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9.Solid Wastes/Solid Waste Landfills	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.Soil Stability/Erodibility	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11.Protected Mountains	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12.Endangered Species	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13.Critical Habitats	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14.Historical	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15.Archaeological	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16.Parks/Recreation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17.Energy Supplies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
18.Beaches	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19.Dunes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20.Shoreline	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21.Estuary	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22.Forest Land	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
23.Barrier Island	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
24.Aquatic Life/Trout Streams	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
25.Hazardous Materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

For the Build Alternative scenario, MARTA and ABI would implement avoidance and mitigation strategies outlined in the EER for each affected resource, in coordination with federal, state, local, and regional stakeholders during detailed design and construction phases, to limit the degrees of impact.

Potential effects of the Build Alternative include:

- Impacts to a maximum 414 linear feet of perennial and intermittent streams, due to the provision of new or extended culvert structures at locations crossed by the BeltLine ROW;
- Encroachments of up to 9.75 acres of floodplains near Peachtree Creek and Clear Creek;
- Production of storm water runoff and waste water;
- Emissions of vehicle-borne contaminants into the air;
- Generation of hazardous or solid waste;
- Soil erosion due to grading of areas adjacent to existing paving;
- Significant impact to two historic resources, due in part to the proposed removal of historic railroad bridges over Ponce de Leon Avenue and Clear Creek (south of Piedmont Avenue NE) and also due in part to the modification of a pedestrian entrance and the displacement of contributing features of a historic building on Piedmont Road. Correspondence from the State Historic Preservation Office dated July 7, 2009 is included in Appendix C;
- Disturbance of potential archaeological remains;
- Proximity effects (visual, aesthetic, and/or vibration) to four parks and/or recreation resources;
- Removal of temporary venue parking area for one park resource;
- Energy expenditures for vehicles and facilities;
- Relocation of energy transmission and distribution lines; and
- Land disturbance and redevelopment near hazardous materials sites, brownfields, and under-utilized industrial locations.

Each alignment option is adjacent to at least one hazardous materials site and poses potential impacts to floodplains and cultural resources in this area. None of the Build Alternative alignment options would avoid adverse environmental effects in the absence of mitigation strategies.

Minimization and mitigation strategies include:

- Acquisition of 1,306 compensatory stream mitigation credits;
- Coordination with the Federal Emergency Management Agency and Georgia Department of Natural Resources (DNR) during project design to minimize impacts to regulatory floodways;
- Management of storm water runoff resulting from new impervious surfaces;
- Collection and disposal of waste water in accordance with local, state and federal regulations;
- Inclusion of erosion, sedimentation and pollution control measures to prevent contamination of storm water;
- Early re-vegetation of disturbed land areas and application of best management practices during construction to avoid soil erosion and stream pollution;

- Coordination of temporary erosion control measures with permanent erosion control features to assure continuous erosion control following construction;
- Satisfaction of stream buffer variance requirements, in accordance with state erosion and sedimentation control laws;
- Development of a Memorandum of Understanding (MOU) between MARTA, ABI, and the SHPO, specifying measures to avoid and minimize harm to cultural resources while maintaining open consultation with the SHPO as the project design process continues;
- Archaeological investigation and testing prior to construction;
- Coordination with the City of Atlanta and the Piedmont Park Conservancy during project design, to identify alternative venue parking options and protected areas under the Land and Water Conservation Fund Act;
- Coordination during project design with utility agencies, including Georgia Power, regarding utility relocation, to avoid interruption of energy supplies;
- Identification of potential spills and releases and underground storage tanks at hazardous materials sites, prior to property demolition or land disturbance; and
- Identification of strategic opportunities to assess and remediate brownfields.

The No Build Alternative avoids the potential for the above impacts, but forgoes the potential benefits and economic impacts (including both economic advantages and disadvantages) summarized in Section 1.4 below.

## 1.4 Benefits and Economic Impacts

Construction of transit and trails in the BeltLine Corridor Northeast Zone can provide linkages between existing and planned development, recreational opportunities, and the transportation network. Environmental gains can derive from the encouragement of transit-oriented mixed-use development and the reduction of vehicle miles traveled and automobile dependence through the use of transit and trails. Context-sensitive design of the proposed action can help preserve and enhance cultural resources within the BeltLine Corridor Northeast Zone. Other potential gains from construction of the proposed project include the removal and control of invasive species and hazardous and solid wastes.

The proposed action can support needs for transportation improvements cited in the City of Atlanta's comprehensive transportation plan, while complementing neighborhood and regional plans to enhance coordinated land use, community circulation, public health, and economic development.

Economic advantages could arise from:

- New jobs generated by construction and remediation activities in the short-term;
- Long-term enhancement of mobility;
- Relief of congested urban thoroughfares;
- Stimulation of redevelopment;
- Creation of permanent employment opportunities; and

- Access to jobs, schools, workforce housing, and activity centers in the BeltLine Corridor Northeast Zone study area.

Secondary advantages relate to redevelopment after construction, including new jobs, preservation of light industrial districts, an expanded local tax base, and additional workforce housing.

However, economic disadvantages could arise from potential business relocation and right-of-way acquisition in Northeast Zone areas outside of the Atlanta Development Authority right-of-way. Additionally, right-of-way acquisition could cause the loss of some taxable land for the City of Atlanta. Continued BeltLine project development and advancement of coordinated transit services, parks, and multi-use trails beyond the Northeast Zone would be necessary to avoid long-term economic disparities.

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## 2.0 COMMENTS RECEIVED

There were 17 comments received from six persons during the public comment period for the EER. The majority of comments pertained to the environmental impacts of the proposed action. Areas of interest included:

- Critical habitats and protected species;
- Streams;
- Flora;
- Cultural resources;
- Air quality;
- Wastewater; and
- Secondary impacts due to development.

Several individuals requested information that is currently outside of the scope of the GEPA assessment and Northeast Zone conceptual design. As information becomes available from the more detailed stages of the BeltLine Corridor design and operational planning processes, MARTA and ABI will coordinate this information with applicable local, state, and federal resource agencies and other key stakeholders in the Northeast Zone.

MARTA and ABI will also perform more detailed impact assessments to comply with the National Environmental Policy Act (NEPA) in the full 22-mile BeltLine Corridor. MARTA and ABI are conducting the Tier 1 NEPA phase for the full BeltLine Corridor concurrently with the GEPA assessment for the Northeast Zone. The subsequent Tier 2 NEPA phase will include design that is more detailed and will produce the impact assessments requested by individuals commenting on the EER.

Attendees of the EER public hearing offered comments regarding alignment options. Comments included:

- Consideration of an alternative transit-trail alignment utilizing the area southeast of Interstate 85 and Armour Drive NE;
- A MARTA heavy rail in-fill station in the Armour Drive NE area to reduce the need to travel to the Lindbergh Center area; and
- A connection to the Northwest Zone of the BeltLine Corridor.

Consideration of these options is ongoing as a function of the concurrent Tier 1 NEPA process. Decisions on alternatives contained within a federally approved NEPA document shall supersede decisions reached via this GEPA process if construction has not begun in the Northeast Zone.

Several comments provided at the EER public hearing also expressed interest in proximity-related effects, including visual, aesthetic, noise, and vibration impacts, to historic resources, parks, and neighboring communities. Where avoidance of proximity-

related effects to these resources is not feasible, context-sensitive considerations and coordination with resource stakeholders will occur as a function of the detailed project design stage for the Northeast Zone.

Appendix A documents the comments received during the EER public comment period and through DNR agency consultation, along with responses to these comments. Appendix B of the Final Decision Document provides an update to sections of the Environmental Effects Report (EER) since its initial public availability on May 7, 2009. Key updates included:

- the addition of Cresthill Path as a resource;
- clarification regarding regional air quality conformity;
- specification of City of Atlanta riparian buffer and associated erosion and sedimentation control requirements;
- a significant impact finding (SHPO correspondence dated July 7, 2009 in Appendix C) for two historic resources (Historic Railroad Resources of the Atlanta BeltLine Northeast Zone; Orkin-Rollins Building);
- a no significant impact finding for one archaeological resource (Battle of Atlanta); and
- clarification of presently-listed sites on the National Register of Historic Places.

### 3.0 DECISION

The Build Alternative for the BeltLine Corridor Northeast Zone consists of the construction of rail transit, multi-use trails, and ancillary facilities. Given that the BeltLine Corridor project design can avoid, minimize, or otherwise mitigate adverse effects on the environment, it is the decision of MARTA and the ADA to proceed with implementation of the Build Alternative.

Concurrent with this decision is an active federal process for environmental review, under the requirements of the National Environmental Policy Act (NEPA) for the entire 22-mile BeltLine Corridor that includes the Northeast Zone. The NEPA planning process incorporates a broader array of criteria to evaluate alternatives in the BeltLine Corridor. In accordance with Section 12-16-7 of GEPA, decisions on alternatives contained within a federally approved NEPA document shall supersede this GEPA decision if construction has not begun in the Northeast Zone.

In the absence of a superseding NEPA decision, MARTA and ADA will proceed with Transit and Multi-Use Trail Option 2 (access Lindbergh Center MARTA station north of Interstate 85, via Piedmont Road NE and Garson Drive NE) for implementation. Relative to the other alignment options, Option 2 produces the lowest potential effect to floodplains, interacts with relatively fewer hazardous materials and contaminated sites, and offers potentially greater benefit of generating pedestrian trips through the presence of an additional transit station at Piedmont Road NE.

All transit and trail alignment options will result in a significant impact to the Historic Railroad Resources of the Atlanta BeltLine. This finding results in part from the potential removal of historic bridges spanning Ponce de Leon Avenue NE and Clear Creek (south of Piedmont Avenue NE).

Option 2 will result in a significant impact to the Orkin-Rollins Building, an eligible historic property located at 2170 Piedmont Road NE. This finding results in part from the proposed action crossing above the pedestrian entrance to the building and requiring the displacement of elements contributing to the historic resource, including the Orkin-Rollins sign.

MARTA and ADA (via Atlanta BeltLine, Inc., the implementation agent for ADA) will maintain open consultation with the State Historic Preservation Office (SHPO), following the stipulations to be contained in a Memorandum of Understanding (MOU) between these agencies as the project design process continues.

10/19/09  
DATE

Beverly L. Scott  
FOR:  
GENERAL MANAGER AND CHIEF EXECUTIVE OFFICER  
METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY (MARTA)

10/7/09  
DATE

Rosy McCormick  
FOR:  
PRESIDENT  
ATLANTA DEVELOPMENT AUTHORITY (ADA)

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**APPENDIX A**

**Responses to Comments Received –  
Environmental Effects Report**

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<b>Name</b>	<b>Organization and/or Title</b>
Mike Oberdorfer	Atlanta Transit Riders' Union (TRU)
<b>City, State</b>	<b>Zip</b>
Decatur, GA	30033
<b>Comment Date</b>	<b>Date Received</b>
5/14/2009	5/14/2009
<b>Medium:</b> Public Hearing (Hillside, Inc.) - Written Comment	
<b>Ref. No.</b>	<b>Comment Category</b>
2009-H001a	Alternatives or Alignment Options
<b>Comment</b>	<b>Response</b>
"I like them. It would cut down on travel times and get more cars off the road."	Comment noted.
<b>Ref. No.</b>	<b>Comment Category</b>
2009-H001b	Environmental Impact
<b>Comment</b>	<b>Response</b>
"Leave the wildlife alone. Also the creeks and streams."	No critical habitats or protected, threatened, or endangered species were identified in the Northeast Zone study area. Compensatory stream mitigation, satisfaction of stream buffer variance requirements, management of storm water runoff, collection and disposal of waste water, early re-vegetation of disturbed land areas, and application of best management practices during construction, will adequately address minor effects outlined in the EER to streams in the study area.
<b>Ref. No.</b>	<b>Comment Category</b>
2009-H001c	Environmental Impact
<b>Comment</b>	<b>Response</b>
"Don't tear down trees or bushes."	Detailed project design for the proposed action will include sensitivity toward the presence of existing native vegetation, including, trees and shrubs and flora, prior to construction within the BeltLine Corridor. Compensatory measures will apply where avoidance options are not feasible. The multi-use trail will also provide opportunities to plant and highlight tree specimens as determined by and in coordination with the BeltLine Arboretum Plan, by Trees Atlanta.

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<b>Ref. No.</b>	<b>Comment Category</b>
2009-H001d	Transit
<b>Comment</b>	<b>Response</b>
"I hope I can use it. I hope my sisters and their kids can use it."	Comment noted.
<b>Medium:</b> Public Hearing (Hillside, Inc.) - Oral Comment	
<b>Ref. No.</b>	<b>Comment Category</b>
2009-H001e	Transit
<b>Comment</b>	<b>Response</b>
"I hope that all of the vehicles will stop long enough for people to get off and on them. Sometimes, the MARTA trains don't always stay in one place that long to let people get off and on, especially in wheelchairs."	The establishment of detailed operational plans, including assumptions for vehicle frequencies, travel times and dwell times, will occur during the final design process. Facility design and system operations will comply with the Americans with Disabilities Act (ADA).

Name	Organization and/or Title
Dianne Olansky	Atlanta Neighborhood Planning Unit F (NPU-F), Morningside-Lenox Park Association (MLPA)
City, State	Zip
Atlanta, GA	30306
Comment Date	Date Received
5/14/2009	5/14/2009
<b>Medium:</b> Public Hearing (Hillside, Inc.) - Oral Comment	
Ref. No.	Comment Category
2009-H002a	Greenspace, Visual/Aesthetic Impact
Comment	Response
<p>"I hope that when you were looking at your options, that you really look at your green space, your visual impacts, it struck me that Piedmont Park being one of our premier regional parks is one of the ones most impacted by this. And some of that is of necessity but I think there are ways of doing things. And so I hope that you're looking at that visual impact, especially when you're dealing with not just Piedmont Park but any our of open green spaces because that's something that's precious to all of us and, you know, it's hard to replace once it's gone."</p>	<p>Minor proximity-related effects from the proposed action, such as visual and aesthetic impacts, are likely to occur in four park and/or recreation areas along the Northeast Zone. These resources include Ansley Golf Club, Piedmont Park and its planned North Woods expansion, and the planned Historic Fourth Ward Park. Consistent with the guidelines for future design of the transit elements of the BeltLine Corridor, the community and sensitivity to surrounding natural and built features will influence the design of the transit infrastructure at these locations. Context-sensitive considerations will support the design of the most visible elements of the transit system, including canopies and shelters, illumination features, signage and wayfinding, landscaping, fencing and safety features, traction power facilities, retaining walls, etc. Coordination with the managers of these resources and surrounding community interests during the design process will assist in mitigating proximity-related effects.</p>

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Ref. No.	Comment Category
2009-H002b	Visual/Aesthetic Impact
Comment	Response
<p>"The other thing I was a little concerned about is the, just the vagueness of the power line issue. Being a person who lives down the street from a substation now, I'm very attuned to those giant power lines and poles and so I'm really concerned about where those might migrate to so I would hope that again, you would look at the visual impact to communities, not just the BeltLine, but the communities adjacent to those. And I guess you-all probably don't have a whole lot of say when you start moving those things, Georgia Power poles, the decisions on that, but I would hope that they would consider community impact and visual impact on that as well."</p>	<p>BeltLine Corridor design efforts will first strive to avoid or minimize conflicts with existing utilities. Where impacts are unavoidable, coordination with utility representatives will proceed regarding relocation or other appropriate mitigative actions. Any necessary utility relocation decisions will include consideration of sensitivity to surrounding built and natural environments.</p>

<b>Name</b>	<b>Organization and/or Title</b>
Sybil Smith	Piedmont Heights Civic Association - Transportation & Public Safety
<b>City, State</b>	<b>Zip</b>
Atlanta, GA	30309
<b>Comment Date</b>	<b>Date Received</b>
5/14/2009	5/14/2009
<b>Medium:</b> Public Hearing (Hillside, Inc.) - Oral Comment	
<b>Ref. No.</b>	<b>Comment Category</b>
2009-H003a	Alternatives or Alignment Options
<b>Comment</b>	<b>Response</b>
<p>"I have a couple of comments in regards to the alignment on the northeast section of the Decatur Belt. In terms of considering an alignment, that's not listed on one of your options, and that is to keep both the rail and the trail on the southeastern side of I-85 and then go into the Armour area via Armour Drive so that the rail and trail are more accessible to the residential area and also some business areas as opposed to Armour, which is an industrial area and has fewer workers. And then that also solves the technical problem in that at that point, you are close to at-grade with CSX and might actually eliminate the need to go to Lindbergh at all. And perhaps, it would be a good candidate for an in-fill MARTA station."</p>	<p>Concurrent with the GEPA process is an active federal process for environmental review, under the requirements of the National Environmental Policy Act (NEPA), leading to the identification of a rail transit technology, transit station locations, and transit and multi-use trail alignments for the entire 22-mile BeltLine Corridor that includes the Northeast Zone. The NEPA planning process incorporates a broader array of criteria to evaluate alternatives in the BeltLine Corridor. Decisions on alternatives contained within a federally approved NEPA document shall supersede the GEPA decision if construction has not begun in the Northeast Zone.</p>
<b>Ref. No.</b>	<b>Comment Category</b>
2009-H003b	Visual/Aesthetic Impact
<b>Comment</b>	<b>Response</b>
<p>"The other piece is I would challenge you as you design your transit to do two things; one is to consider alternate modes of power so that you can eliminate the visual pollution of the overhead wires and the other piece is to make sure that between the rails is ideally some form of pervious surface, preferably something along the lines of grass but additional green and not pavement or gravel kinds of things."</p>	<p>Available measures of traction power to minimize the introduction of overhead wires, as well as alternative surface materials and landscape treatments, will be considered as part of the BeltLine Corridor project design.</p>

Continued on next page

<b>Ref. No.</b>	<b>Comment Category</b>
2009-H003c	Environmental Impact
<b>Comment</b>	<b>Response</b>
<p>"I have not heard at any time -- and I did get here a little bit late -- but I haven't heard anywhere in the discussion any consideration of noise or vibration impacts with the build or any of the build alternatives, neither in terms of existing conditions nor any plans to study those elements going forward. So I would say noise and vibration should be, particularly with the, you know, the historic resources, the Villa right at Montgomery Ferry, adjacent to the Beltline, is on the Historic Register as is Ansley Park, and noise and vibration need to be taken into account in regards to those historic resources."</p>	<p>The GEPA evaluation included an assessment of atmospheric effects to cultural resources within the area of potential effect, in coordination with the Georgia State Historic Preservation Office. Project implementation would not result in the introduction of atmospheric elements that diminish the integrity of significant historic characteristics or features. MARTA and ABI will assess general noise and vibration impacts to sensitive resources along the full 22-mile BeltLine Corridor, including the Northeast Zone, as required under the provisions of the National Environmental Policy Act (NEPA).</p>
<b>Ref. No.</b>	<b>Comment Category</b>
2009-H003d	Alternatives or Alignment Options
<b>Comment</b>	<b>Response</b>
<p>"I see lots of diagrams about how you get to Armour and Lindbergh but I don't see any real diagrams as to how you leave that facility to continue onto the CSX portion of that BeltLine."</p>	<p>Concurrent with the pending GEPA decision is an active federal process for environmental review, under the requirements of NEPA, leading to the identification of a rail transit technology, transit station locations, and transit and multi-use trail alignments for the entire 22-mile BeltLine Corridor that includes both the Northeast Zone and the Northwest Zone. Alternative alignment decisions in the Northwest Zone and connection options with the Northeast Zone are a function of the active NEPA process, leading toward the development of a Tier 1 Environmental Impact Statement (EIS).</p>

Name	Organization and/or Title
Bert Pearce	Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch
City, State	Zip
Atlanta, GA	30334
Comment Date	Date Received
5/14/2009	5/14/2009
<b>Medium: E-Mail</b>	
Ref. No.	Comment Category
2009-0001a	Environmental Impact
Comment	Response
<p>"General Conformity will apply since the project is in nonattainment areas for both ozone and fine particulate matter. Air emissions estimates from construction and from the final product will need to be included as part of the Environmental Impact Statement."</p>	<p>MARTA and ADA (via ABI) will complete an air quality analysis as part of the BeltLine Corridor Environmental Study to demonstrate that all surface transportation-related construction will not interfere with achieving compliance with the National Ambient Air Quality Standards (NAAQS). The evaluation provided in the Environmental Effects Report (EER) satisfies the assessment requirement for state (non-federal) actions as part of the Georgia Environmental Policy Act (GEPA). For any future federal actions, a detailed conformity analysis will occur during the Tier 2 phase of environmental evaluation for the BeltLine Corridor, in accordance with the National Environmental Policy Act (NEPA).</p> <p>Under the provisions of the Clean Air Act (Section 176) and its amendments, as well as the Georgia Air Quality Control Act (Section 391-3-1), all transportation projects must conform to the state air quality implementation plans (SIP). Conformity to the SIP means that transportation activities will not produce new air quality violations, worsen existing violations, or delay timely attainment of the NAAQS. The transportation conformity regulations are part of a two-tiered approach that applies only to surface transportation projects (including the mass transit facilities and multi-use trail elements included in the proposed action of this EER). The other regulations, known as general conformity, apply to other actions, such as airports, stationary facilities, waterways, or military facilities. Although both the transportation conformity and the general conformity regulations are intended to ensure that federal activities do not cause or contribute to new violations of the NAAQS, only transportation conformity must be assessed as part of the BeltLine Corridor Environmental Study. However, for purposes of demonstrating that the BeltLine Corridor Environmental Study will conform to the SIP and the NAAQS, the conformity analyses are the same and will be prepared during the Tier 2 NEPA phase in accordance with the Georgia Air Quality Control Act (Section 391-3-1-14, General Conformity).</p> <p>Detailed elements of the project, including traffic effects, transit operations and final corridor alignments, will support the conformity analysis conducted during the Tier 2 NEPA phase. MARTA and ADA completed an initial determination of air quality effects, and in essence the project's conformity, as part of the GEPA environmental process as currently presented in the EER. The EER identifies areas of potential effect within the corridor and the</p>

Continued on next page

	<p>current attainment status of the project area.</p> <p>For example, according to the Atlanta Regional Commission (ARC), the BeltLine Corridor is contained in the Envision6 Regional Transportation Plan (RTP) and the FY 2008-2013 Transportation Improvement Program (TIP). As such, the project is contained in the air quality models for the metropolitan Atlanta non-attainment area for ozone and particulate matter (PM2.5). Therefore, one may assume the project conforms on a regional level to the NAAQS for both ozone and PM2.5 because the project is part of a conforming RTP and TIP. This assessment of transportation conformity satisfies the guidelines for air quality assessment under GEPA for non-federal actions.</p> <p>As part of the Tier 2 NEPA phase, a future hot spot analysis will determine the potential impact from ozone and particulate matter at congested intersections within the project study area. In general, carbon monoxide (CO) is typically used as a surrogate for other pollutants since, if a violation of the NAAQS is expected, it would occur with CO before any other pollutant. Comparisons of predicted concentrations of CO with the NAAQS will help determine the onset of impact.</p>
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<b>Name</b>	<b>Organization and/or Title</b>
Jimmy Johnston	Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch
<b>City, State</b>	<b>Zip</b>
Atlanta, GA	30334
<b>Comment Date</b>	<b>Date Received</b>
5/15/2009	5/15/2009
<b>Medium: E-Mail</b>	
<b>Ref. No.</b>	<b>Comment Category</b>
2009-0002	Environmental Impact
<b>Comment</b>	<b>Response</b>
"Please note that section 4.5 of the Environmental Effects Report does not satisfy the requirements of General Conformity. The RTP and TIP mentioned in this section address Transportation Conformity, which considers emissions from on-road vehicles after the project is completed. General Conformity considers emissions during construction of the project."	Please refer to the response to Comment 2009-0001a.

<b>Name</b>	<b>Organization and/or Title</b>
Emily Wingo	Georgia Department of Natural Resources, Environmental Protection Division, Watershed Protection Branch
<b>City, State</b>	<b>Zip</b>
Atlanta, GA	30334
<b>Comment Date</b>	<b>Date Received</b>
6/1/2009	6/1/2009
<b>Medium: E-Mail</b>	
<b>Ref. No.</b>	<b>Comment Category</b>
2009-0003a	Environmental Impact
<b>Comment</b>	<b>Response</b>
"Section 4.4 regarding wastewater collection and disposal indicates it will be done according to local and state rules. No volume estimate or discussion of facilities needed is provided. Will existing infrastructure be adequate?"	Detailed project design for the proposed action will provide the appropriate data inputs (facility types and sizes, and volume estimates) to conduct wastewater generation assessments in accordance with applicable regulations and in coordination with federal, state, and local agencies. In the interim, assessments conducted as part of this EER indicate that there is adequate municipal wastewater capacity to support the proposed action in the Northeast Zone, based on the project's conceptual design.
<b>Ref. No.</b>	<b>Comment Category</b>
2009-0003b	Environmental Impact
<b>Comment</b>	<b>Response</b>
"The impacts related to growth and development as a result of the BeltLine should be discussed. Population projections and density should be discussed."	While a discussion of densities and projected growth for population, households, and employment are beyond the scope of this GEPA assessment, the BeltLine Corridor Environmental Study has prepared an Existing Conditions Report providing this information between 1990-2030 and other socioeconomic data for the full 22-mile BeltLine corridor, inclusive of the Northeast and other zones. The report is available on the Environmental Study webpage at <a href="http://www.beltline.org/">http://www.beltline.org/</a> .
<b>Ref. No.</b>	<b>Comment Category</b>
2009-0003c	Environmental Impact
<b>Comment</b>	<b>Response</b>
"Wastewater generation estimates should be developed that account for the development anticipated as the result of the BeltLine project."	Detailed project design for the proposed action will allow for a refinement of data in the BeltLine Redevelopment Plan, prepared in November 2005 by the Atlanta Development Authority (ADA) regarding development impacts within the redevelopment area of the BeltLine Corridor. This refined data will support an evaluation of secondary impacts during the Tier 2 assessment phase in compliance with the National Environmental Policy Act (NEPA).

**APPENDIX B**

**Addenda –**

**Revisions to Environmental Effects Report**

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## 1.0 INTRODUCTION

### 1.5 Environmental Setting

~~Fourteen-Fifteen~~ parks/recreational areas are within the study area, including ten existing public parks/recreation areas, two planned public parks, and ~~two-three~~ privately owned recreation areas. ~~Seven-Eight~~ of these resources are ~~either within or~~ immediately adjacent to the Northeast Zone right-of-way.

### 1.6 Environmental Effects

Potential effects of the Build Alternative include:

- Impacts to a maximum 414 linear feet of perennial and intermittent streams, due to the provision of new or extended culvert structures where crossed by the BeltLine right-of-way;
- Encroachments of up to 9.75 acres of floodplains near Peachtree Creek and Clear Creek;
- Production of storm water runoff and waste water;
- Emissions of vehicle-borne contaminants into the air;
- Generation of hazardous and/or solid waste;
- Soil erosion due to grading of areas adjacent to existing paving;
- ~~Adverse effect to one historic resource, due to modification of a pedestrian entrance;~~
- Significant impact to two historic resources, due in part to the proposed removal of historic railroad bridges over Ponce de Leon Avenue and Clear Creek (south of Piedmont Avenue NE) and also due in part to the modification of a pedestrian entrance and the displacement of contributing features of a historic building on Piedmont Road;
- Disturbance of potential archaeological remains;
- Proximity effects (visual, aesthetic and/or vibration) to four parks/recreation resources;
- Removal of temporary venue parking area for one park resource;
- Energy expenditures for vehicles and facilities;
- Relocation of energy transmission and distribution lines; and
- Land disturbance and redevelopment near hazardous materials sites, brownfields and under-utilized industrial locations.

The EER presents more detail on the environmental consequences of the proposed action in Section 4.0.

Each alignment option is adjacent to at least one hazardous materials site and poses potential impacts to floodplains and cultural resources in this area. None of the Build Alternative alignment options would avoid adverse environmental effects in the absence of mitigation strategies.

**Table 1-1: GEPA Environmental Checklist**

GEORGIA AREA/CATEGORY	IS AREA AFFECTED?		HOW SEVERE?		
	Yes	No	N/A	Minor	Major
1.Wetlands/Waters of the U.S. and State	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.Floodplains	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3.Water Supply	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.Water Resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.Groundwater Recharge Area	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.Storm Water	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7.Waste Water	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8.Air Quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9.Solid Wastes/Solid Waste Landfills	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.Soil Stability/Erodibility	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11.Protected Mountains	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12.Endangered Species	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13.Critical Habitats	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14.Historical	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
15.Archaeological	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16.Parks/Recreation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17.Energy Supplies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
18.Beaches	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19.Dunes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20.Shoreline	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21.Estuary	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22.Forest Land	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
23.Barrier Island	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
24.Aquatic Life/Trout Streams	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
25.Hazardous Materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Minimization and mitigation strategies include:

- Acquisition of 1,306 compensatory stream mitigation credits;
- Coordination with the Federal Emergency Management Agency and Georgia Department of Natural Resources (DNR) during project design to minimize impacts to regulatory floodways;
- Management of storm water runoff resulting from new impervious surfaces;
- Collection and disposal of waste water in accordance with local, state and federal regulations;
- Inclusion of erosion, sedimentation and pollution control measures to prevent contamination of storm water;
- Early re-vegetation of disturbed land areas and application of best management practices during construction to avoid soil erosion and stream pollution;
- Coordination of temporary erosion control measures with permanent erosion control features to assure continuous erosion control following construction;
- Satisfaction of stream buffer variance or exemption certificate requirements, in accordance with state-applicable riparian buffer regulations and erosion and sedimentation control laws;
- ~~Application of design measures to preserve and otherwise re-use historic resources;~~
- Development of a Memorandum of Understanding (MOU) between MARTA, ABI, and the SHPO, specifying measures to avoid and minimize harm to cultural resources while maintaining open consultation with the SHPO as the project design process continues;
- Archaeological investigation and testing prior to construction;
- Coordination with the City of Atlanta and the Piedmont Park Conservancy during project design, to identify alternative venue parking options and protected areas under the Land and Water Conservation Fund;
- Coordination during project design with utility agencies, including Georgia Power, regarding utility relocation, to avoid interruption of energy supplies;
- Identification of potential spills and releases and underground storage tanks at hazardous materials sites, prior to property demolition or land disturbance; and
- Identification of strategic opportunities to assess and remediate brownfields.

## 3.0 ENVIRONMENTAL SETTING

### 3.1 Environmental Setting without the Project

~~Fourteen~~ ~~Fifteen~~ parks/recreational areas are within the study area, including ten existing public parks/recreation areas, two planned public parks, and ~~two three~~ privately owned recreation areas. ~~Eight of these resources are either within or immediately adjacent to the Northeast Zone right-of-way.~~

## 4.0 ENVIRONMENTAL CONSEQUENCES

### 4.1 Wetlands/Waters of the U.S. and State

#### 4.1.1 Assessment of Effects

Table 4-1 lists wetlands/Waters of the U.S. and State potentially affected by the proposed Build Alternative. The proposed action avoids direct impacts to several of the water resources. However, most of the water resources also have a **minimum** 25-foot vegetative buffer. Table 4-1 also summarizes the impacts to each of the water resources and associated buffers. The following sections detail each of the water resources in the study area.

#### 4.1.5 Stream Buffer Mitigation

The proposed action would not encroach on any land within 25 feet of open water (e.g., pond or lake). However, the project would longitudinally encroach on the 25-foot vegetative stream buffer of the following streams: Stream 2, Stream 3, Stream 4, Stream 10, and Stream 13. Therefore, based on the criteria outlined in Rule 391-3-7.05 under the DNR Environmental Protection Division (EPD) Erosion and Sedimentation Control Branch, in accordance with the Georgia Erosion and Sedimentation Act of 1975, as amended, the project would require Stream Buffer Variances for project implementation. **The affected streams are also within the 75-foot buffer under the City of Atlanta Riparian Buffer ordinance (City of Atlanta Code of Ordinances, Chapter 74, Article VII), and are subject to exemption certificate policy under the ordinance.**

### 4.5 Air Quality

Metropolitan Atlanta is currently designated a nonattainment area for ozone and fine particulate matter (PM<sub>2.5</sub>) by the USEPA. According to the ARC, the BeltLine is contained in the *Envision6* RTP and the FY 2008-2013 TIP (**initially adopted by the ARC Board in September 2007**). As such, the project is contained in the air quality models for the Metropolitan Atlanta nonattainment area for ozone and fine particulates. Therefore, **as part of a conforming RTP, the current project elements, as described in the RTP, are assumed to also conform conforms on a regional level to the National Ambient Air Quality Standards (NAAQS) by improving regional air quality for both ozone and PM<sub>2.5</sub> because the project is part of a conforming RTP and TIP. However, the air quality impacts may require re-evaluation if there are any significant changes to the project elements.**

A mesoscale analysis **as part of the GEPA assessment** is not necessary to disclose regional emissions resulting from the project because quantification of these emissions occurred during development of the RTP **conformity determination**. Discharges and releases of any contaminants into the air resulting from the construction and operation of facilities for transit and multi-use trails are subject to regulation under the Georgia Air Quality Control Act and the **Clean Air Act (40 CFR part 50) NAAQS**.

### 4.7 Soil Stability/Erodibility

Section 4.1.5 of this EER identifies potential stream encroachments and buffer variance requirements, in accordance with the Georgia Erosion and Sedimentation Control Act.

Potential stream encroachments within the City of Atlanta riparian buffer are also subject to the requirements of the City of Atlanta Soil Erosion and Sedimentation Control Ordinance.

Provisions in the construction contract for the proposed project would require the contractor to exercise every reasonable precaution during construction to prevent the pollution of streams in the project vicinity. Early re-vegetation of disturbed areas, where possible, would hold soil movement to a minimum.

## 4.8 Historic Resources

**Table 4-4: National/Georgia Register Listed/Eligible Properties in Area of Potential Effect**

ID #	Name of Resource	Property Type	Location	National/Georgia Register Status or Recommendation
1	Ansley Park Historic District	Residential Historic District and Golf Club	Bounded by 15 <sup>th</sup> Street NE, Atlanta Development Authority right-of-way, and Piedmont Avenue NE	LISTED 04-20-1979
2	Piedmont Park	Public Park and Exposition Site	Bounded by 10 <sup>th</sup> Street NE, Piedmont Road NE, and Atlanta Development Authority right-of-way	LISTED 05-13-1976
3	Virginia-Highland Historic District	Residential District	Bounded by Ponce de Leon Avenue NE, Amsterdam Avenue NE, Atlanta Development Authority right-of-way, and Rosedale Road NE	LISTED 05-10-2005
4	Martin Luther King, Jr. Historic District	Residential, Commercial, Institutional, and Industrial District	Bounded by Edgewood Avenue NE, Irwin Street NE, Courtland Street NE, John Wesley Dobbs Avenue NE, and Freedom Parkway NE	LISTED 1974 Boundary Increases 1980, 1994, 2001
5	Inman Park Historic District	Residential District	Bounded by DeKalb Avenue NE, Lake Avenue NE, Krog Street NE, and Hurt Street NE	LISTED 1973 Boundary Increase 2001
6	Inman Park-Moreland Historic District	Residential District	Bounded by DeKalb Avenue NE, Cleburne Avenue NE Freedom Park, and Moreland Avenue NE, Battery Place NE	LISTED 1986 Boundary Increase 2003

ID #	Name of Resource	Property Type	Location	National/Georgia Register Status or Recommendation
7	Historic Railroad Resources of the Atlanta BeltLine Northeast Zone	Railroad structures and building and bridge structures	<ul style="list-style-type: none"> <li>• Armour Yard</li> <li>• Former Southern Railway Corridor (including railway within ADA right-of-way)</li> <li>• Hulsey Yards</li> <li>• Terminal Building (240 Highland Avenue NE)</li> <li>• Norfolk Southern bridge over Lindbergh Drive NE (GDOT Bridge 121-0507-0)</li> <li>• Norfolk Southern bridge over Armour Drive NE (GDOT Bridge 121-5135-0)</li> <li>• Norfolk Southern bridge over I-85 (GDOT Bridge 121-0488-0)</li> <li>• Clear Creek Trestle</li> <li>• Clear Creek Bridge</li> <li>• Clear Creek Brick Arch Culvert</li> <li>• Park Drive NE bridge over ADA right-of-way and Peachtree Creek tributary (GDOT Bridge 121-5088-0)</li> <li>• Piedmont Avenue NE bridge over ADA right-of-way (GDOT Bridge 121-0036-0)</li> <li>• Virginia Avenue NE bridge over ADA right-of-way (GDOT Bridge 121-0408-0)</li> <li>• ADA right-of-way bridge over Ponce de Leon Avenue NE (GDOT Bridge 121-0491-0)</li> <li>• ADA right-of-way bridge over Ralph McGill Boulevard NE (GDOT Bridge 121-0515-0)</li> <li>• Edgewood Avenue NE bridge over ADA right-of-way (GDOT Bridge 121-0024-0)</li> <li>• CSX bridge over Boulevard SE (GDOT Bridge 121-0527-0)</li> <li>• CSX bridge Estoria Street SE/Krog Street NE (GDOT Bridge 121-5148-0)</li> </ul>	ELIGIBLE
8	Atlanta's Historic Apartment Complexes 430 Lindbergh Drive	Apartment Complexes	430 Lindbergh Drive NE	ELIGIBLE
9	Peachtree Hills	Residential District	Bounded by Sharondale Drive NE, Peachtree Creek, Glenwood Road NE, Lindbergh Drive NE, and Sharondale Court NE	ELIGIBLE
10	Orkin-Rollins Building	Office and Warehouse Buildings	2162, 2170 Piedmont Road NE	ELIGIBLE
11	441 Armour Drive	Commercial Building	441 Armour Drive NE	ELIGIBLE
12	2131 Old Plasters Bridge Road	Commercial Building	2131 Old Plasters Bridge Road NE	ELIGIBLE

ID #	Name of Resource	Property Type	Location	National/Georgia Register Status or Recommendation
13	Mason Chapel Baptist Church/Masonic Lodge	Front Gabled Church and Lodge	113 Mayson Street NE	ELIGIBLE
14	1904 Monroe Drive	Office International Style Building	1904 Monroe Drive NE	ELIGIBLE
15	Piedmont Heights	Residential District	Bounded by Piedmont Road NE, Montgomery Ferry Road NE, Flagler Avenue NE, north ends of Kilburn Drive NE and Lebanon Drive NE, and Gotham Way NE	ELIGIBLE
16	Pylant-Drewry-Greenwood Historic District	Commercial and Industrial District	<ul style="list-style-type: none"> <li>• 665 Pylant Street NE</li> <li>• 675, 680 Drewry Street NE</li> <li>• 686 Greenwood Avenue NE</li> <li>• 710, 712, 729, 730, 740, 750 Ponce de Leon Place NE</li> </ul>	ELIGIBLE
17	Ponce de Leon-Ralph McGill Historic District	Industrial District	<ul style="list-style-type: none"> <li>• 675, 699 Ponce de Leon Avenue NE</li> <li>• 710, 712, 729, 730, 740, 750 Ponce de Leon Place NE</li> <li>• 621, 695 North Avenue NE</li> <li>• 575, 650 Glen Iris Drive NE</li> <li>• 723, 750, 794, 820 Ralph McGill Boulevard NE</li> <li>• 568, 580, 591 Somerset Terrace NE</li> </ul>	ELIGIBLE
18	Krog Street-Southern Railway Historic District	Commercial and Industrial District	<ul style="list-style-type: none"> <li>• 154, 130, 112, 99 Krog Street NE</li> <li>• 700 Lake Avenue NE</li> <li>• 151 Sampson Street NE</li> <li>• 660, 716, 724 Edgewood Avenue NE</li> <li>• 710 DeKalb Avenue NE</li> </ul>	ELIGIBLE
19	Inman Motor Works	Commercial and Industrial	820, 834 DeKalb Avenue NE	ELIGIBLE

#### 4.8.1 Description of Historic Properties

##### Ansley Park Historic District (Resource 1)

The EER assessment included an evaluation of this property for eligibility as a listing in the National Register. This district is in the National Register, qualifying under Criteria A and C. The district possesses a local level of significance in the areas of architecture, community planning and landscape architecture as a planned suburban community from the early 20th century.

##### Piedmont Park (Resource 2)

The EER assessment included an evaluation of this property for eligibility as a listing in the National Register. This district is in the National Register, qualifying under Criteria A and C. The property district possesses a local level of significance in the areas of landscape architecture, urban planning, and history as an urban park designed utilizing

the principles of the nationally renowned landscape architect, Frederick Law Olmsted, Sr.

### **Virginia-Highland Historic District (Resource 3)**

The EER assessment included an evaluation of this property for eligibility as a listing in the National Register. This district is in the National Register, qualifying under Criteria A and C. The district possesses a local level of significance in the areas of architecture, commerce, community planning and development, and landscape architecture as an intact 20th century suburban neighborhood.

### **Martin Luther King, Jr., Historic District (Resource 4)**

The Martin Luther King, Jr., Historic District (Figure 4-13) is a residential, commercial, institutional and industrial district north of DeKalb Avenue NE, south of Freedom Parkway NE, east of I-75/85, and west of the former Southern Railway (Atlanta Development Authority right-of-way). Spanning the period from c. 1853 – 1968, the district includes vernacular houses, community landmark buildings, such as the David T. Howard School; and several industrial resources important to the development of the Auburn Avenue neighborhood, including the Atlantic/Southeastern Compress and Warehouse constructed in 1905 to store cotton.

The EER assessment included an evaluation of this property for eligibility as a listing in the National Register. This district is in the National Register, qualifying under Criteria A, B, and C. The district possesses a local and national level of significance in the areas of Ethnic Heritage: Black, Social History, Community Planning and Development and Architecture as a turn of the 20th century neighborhood that became a thriving African-American community where several key leaders of the black community, including Martin Luther King, Jr., resided.

### **Inman Park Historic District (Resource 5)**

The EER assessment included an evaluation of this property for eligibility as a listing in the National Register. This district is in the National Register, qualifying under Criteria A and C. The district possesses a local level of significance in the areas of architecture, landscape architecture, community planning and development and transportation as a late 19th to mid-20th century residential suburb utilizing landscape plans and tenets of landscape gardener Joseph Forsyth Johnson and landscape architect Frederick Law Olmsted.

### **Inman Park-Moreland Historic District (Resource 6)**

The Inman Park-Moreland Historic District (Figure 4-14) is a primarily residential district east of downtown Atlanta. The late 19th to early 20th century neighborhood is comprised of houses wherein many of the city's political and business leaders resided; the commercial area of Little Five Points; and two historic schools, the Moreland School and the William A. Bass Junior High School and Gymnasium.

The EER assessment included an evaluation of this property for eligibility as a listing in the National Register. This district is in the National Register, qualifying under Criteria A, B, and C. The district possesses a local level of significance in the areas of architecture, community planning and development, commerce, education and local history as an

intact turn-of-the-20th century residential district with commercial properties notable for its association with prominent Atlantans.

### **Pylant-Drewry-Greenwood Historic District (Resource 16)**

The Pylant-Drewry-Greenwood Historic District (Figure 4-11) is a district of five industrial buildings at 665 Pylant Street NE; 675 and 680 Drewry Street NE; and 675 and 686 Greenwood Avenue NE. The buildings are roughly bounded by Greenwood Avenue NE to the south, Pylant Street NE to the north, the former Southern Railway to the west, and Ponce de Leon Place NE to the east. Constructed between 1925 and 1949, the buildings include:

- two block-long attached warehouse-type buildings of sheet metal;
- a long rectangular brick building with a gable-roof clad in asphalt shingles and bands of metal-frame awning windows that served as a printing company;
- a one-story, L-shaped building serving as a dairy products manufacturer with concrete block and vinyl sidings;
- a brick building housing a variety of construction activities of which one was the namesake “B. Mifflin Hood Brick Co” as written on the façade; and
- a long one- to three-story trapezoid-shaped former industrial building with the original arched and flat-headed brick entrance and replacement stucco exterior.

#### **4.8.2 Effects to Historic Resources**

The Proposed State Action involves the disturbance of land within the BeltLine Corridor Northeast Zone for the construction of a fixed rail transit guideway and multi-use trails. Land disturbance is likely to include clearing, grading, or excavating of land owned by either MARTA or the Atlanta Development Authority.

There are 19 listed or eligible historic properties within the APE of the proposed action. A summary of ~~anticipated adverse~~ effects to the resources resulting from the proposed action follows. ~~These findings are pending concurrence with the~~ The SHPO has concurred with these findings, as documented in a letter dated July 7, 2009. ~~as coordination is ongoing.~~

There would be no atmospheric effect to these resources resulting from project implementation. The proposed project is consistent with the State Implementation Plan for air quality in the region.

~~Pending SHPO concurrence with the assessment of effects, No Adverse Effect findings are anticipated for~~ The SHPO concurred that the proposed project would have no significant impact on the following resources:

- Ansley Park Historic District (Resource 1);
- Piedmont Park (Resource 2);
- Virginia-Highland Historic District (Resource 3);
- Martin Luther King, Jr. Historic District (Resource 4);
- Inman Park Historic District (Resource 5);

- Inman Park-Moreland Historic District (Resource 6);
- 430 Lindbergh Drive NE - Atlanta's Apartment Complexes (Resource 8);
- Peachtree Hills (Resource 9);
- 441 Armour Drive NE (Resource 11);
- 2131 Old Plasters Bridge Road NE (Resource 12);
- Mason Chapel Baptist Church/Masonic Lodge (Resource 13);
- 1904 Monroe Drive NE (Resource 14);
- Piedmont Heights (Resource 15);
- Pylant-Drewry-Greenwood Historic District (Resource 16);
- Ponce de Leon-Ralph McGill Historic District (Resource 17);
- Krog Street-Southern Railway Historic District (Resource 18); and
- Inman Motor Works (Resource 19)

Additionally, the SHPO found that the proposed project would have a significant impact a conditional No Adverse Effect finding is anticipated for one on two historic resources, as discussed below.

#### **Historic Railroad Resources of the Atlanta BeltLine Northeast Zone (Resource 7)**

Pending SHPO concurrence, this conditional finding relates to the relocation or modification of bridge features to support the BeltLine Corridor right-of-way and access to trails and station areas. BeltLine Corridor design guidelines will incorporate strategies to preserve in-place and re-use features and materials contributing to the historic character and/or use of these structures. In addition, where possible, other features of the Historic Railroads, including the railbed, other bridge structures, extant masonry walls, the terminal building, and the signal device, will remain intact.

The SHPO issued a finding of significant impact for this resource for all transit and trail options under consideration. This finding results from the proposed removal of the NRHP-eligible railroad bridges spanning Ponce de Leon Avenue NE and Clear Creek (south of Piedmont Avenue NE).

Finally, an adverse effect finding is possible for one historic resource.

#### **Orkin-Rollins Building (Resource 10)**

Pending the SHPO finding, an The SHPO issued a finding of significant impact is anticipated for this resource under Transit and Multi-Use Trail Option 2, resulting from the proposed action crossing over and above the pedestrian entrance to the resource at Piedmont Road NE, requiring modification of the pedestrian entrance and displacement of contributing features. A finding of no significant impact is anticipated as a result of was determined for this resource under Option 1/1A and Option 3.

## **4.9 Archaeological Resources**

The EER assessment included a Phase I archaeological survey of the Northeast Zone of the BeltLine Corridor. Consultation of the state archaeological site files at the University

of Georgia and existing survey reports resulted in the location of previously identified archaeological sites within the APE. Further, reviews of topographic maps and aerial photography resulted in the identification of areas with high potential for archaeological sites within the APE. A review of the Georgia Archaeological Site Files at the University of Georgia in Athens showed that eight archaeological sites are within a 1-kilometer (0.62 mile) radius of the project corridor. The proposed action would have no effect on seven of these sites since they are outside the APE of the present undertaking.

The location of one previously identified archaeological site, 9FU77 (Battle of Atlanta), is in or adjacent to the proposed project corridor. Application of NRHP significance Criterion A (association with events that have significantly contributed to the broad patterns of history) and Criterion D (ability to yield information significant to prehistory or history) resulted in a recommendation of eligibility for this site.

The current investigation identified one previously unrecorded archaeological resource, 9FU549 (masonry wall remnant of former Atlanta Stove Works, at Krog Street NE and Irwin Street NE). A recommendation that this site is not eligible for the NRHP results from its limited potential to yield additional significant information. Also identified during the current undertaking were two isolated finds. Isolated Find 1 is a single stoneware sherd and Isolated Find 2 is a prehistoric quartz thinning flake. A recommendation that the isolated finds are not eligible for the NRHP results from their low research potential.

As a result of the urbanized nature of the proposed corridor, archaeological surveying in specific areas of the APE was inconclusive. Investigation could not occur for some paved locations, including areas near 9FU77, resulting from the limitations of manual Phase I survey methods. Documentary evidence indicates a high probability of Civil War remains in this area, which may be in a preserved state beneath urban fill. Further archaeological testing at 9FU77 would be necessary if the project design impacts potentially preserved portions of the site. Additionally, the area near Isolated Find 2 contained a wide broadcast of modern debris, which hampered efforts to survey that location for Civil War remains believed to be in the vicinity. While Isolated Find 2 holds little research value on its own, it indicates the area exhibits little disturbance below the modern humic zone (the organic soil layer derived from decomposition of plant or animal matter). Based on historical research, further investigation would be necessary if the proposed action extends into relatively undisturbed portions of the area.

The SHPO issued a finding of no significant impact for Archaeological Site 9FU77. This finding relates to the potential impacts to the site of the 1864 Battle of Atlanta in the area of the Inman Park/Reynoldstown MARTA Station. Due to limitations of the manual Phase I survey, it was not possible to determine the extent and nature of this site. Should final design plans require construction and ground-disturbing activity exceeding a one-foot (0.3 meter) vertical depth below the modern ground surface, BeltLine Corridor guidelines will require pre-construction geophysical investigations be conducted, as well as archaeological monitoring of construction activity. MARTA and ABI will consult the SHPO on any potentially significant archaeological features to reassess impacts to the site. The above stipulations are included in the proposed MOU between MARTA, ABI, and the SHPO.

## 4.10 Parks/Recreation

~~Fourteen-Fifteen~~ parks/recreational resources are within the study area for the Northeast Zone. Among these resources, ten of these parks are public park resources, ~~two-three~~ of these parks/~~recreational resources~~ are under private ownership, and two are planned parks. Table 4-5 below lists and describes these park and recreation resources within

the study area for the proposed action. Figure 4-15 through Figure 4-22 identify park and recreation resources near the Northeast Zone study area.

Based on a preliminary assessment of the transit and trails alignment provided to date, seven of the park resources near the proposed project are well outside the LOD for the proposed transit and trail alignments. The following parks would not likely experience any effects:

- Smith Park;
- McClatchey Park;
- Ansley Park;
- Cabbagetown Park;
- Inman Park;
- Springvale Park; and
- Lang Carson Park

The remaining ~~seven~~ eight park resources are either within or immediately adjacent to the proposed right-of-way for the proposed project. These resources include:

- Peachtree Hills Park;
- Brookwood Hills Conservation Easement;
- Ansley Golf Club;
- Piedmont Park;
- (Planned) Piedmont Park Expansion Areas;
- (Planned) Historic Fourth Ward Park at North Avenue; and
- Cresthill Path; and
- Freedom Park

While the proposed project does not pose direct impacts on the ~~seven~~ eight park resources adjacent to the ROW, four park resources may experience proximity impacts because of visual and vibration effects resulting from the project. These resources include Ansley Golf Club, Piedmont Park, planned Piedmont Park expansion areas, and the planned Historic Fourth Ward Park at North Avenue. These park resources are found south of I-85, where there is a single proposed transit and trail alignment under the Build Alternative. Descriptions of potential impacts for these resources follow.

**Table 4-5: Park and Recreation Resources**

<b>Park<sup>1</sup></b>	<b>Location/Description</b>	<b>Size (acres)</b>	<b>Impact</b>
Peachtree Hills Park <sup>2</sup>	<ul style="list-style-type: none"> <li>• Neighborhood park at 308 Peachtree Hills Avenue NE.</li> <li>• Offers a gym, softball and soccer fields, tennis courts, a playground, and a picnic area.</li> <li>• Recently undergoing renovations by local area residents.</li> </ul>	7.20	No impact
Brookwood Hills Conservation Easement	<ul style="list-style-type: none"> <li>• Private easement between Armour Drive NE and Peachtree Creek .</li> <li>• Brookwood Hills Community Club is private owner.</li> <li>• Has no public access.</li> </ul>	47.80	No impact
Ansley Golf Club	<ul style="list-style-type: none"> <li>• Private golf course at 196 Montgomery Ferry Drive NE.</li> </ul>	63.30	Potential proximity impacts as a result of visual and vibration impacts
McClatchey Park	<ul style="list-style-type: none"> <li>• Neighborhood park at Avery Drive/Westminster Drive NE.</li> </ul>	5.00	No impact
Smith Park	<ul style="list-style-type: none"> <li>• Garden park at 1571 Piedmont Avenue NE / 1547 Monroe Drive.</li> </ul>	0.41	No impact
Ansley Park	<ul style="list-style-type: none"> <li>• Neighborhood park at Maddox Drive / E. Park Lane NE.</li> </ul>	6.11	No impact
Piedmont Park <sup>3</sup>	<ul style="list-style-type: none"> <li>• Regional park in the Midtown area at 400 Park Drive NE.</li> <li>• Created in 1887 and described by many as the "Central Park" of Atlanta.</li> <li>• Includes landscape design by noted historical figures Joseph Forsyth Johnson and the sons of Frederick Law Olmsted.</li> <li>• Often considered the focal point of the Midtown community.</li> <li>• Home to various annual celebrations and events.</li> </ul>	185.00	Potential proximity impacts as a result of visual and vibration impacts; loss of parking at Park Tavern
Proposed Piedmont Park Expansion <sup>3</sup>	<ul style="list-style-type: none"> <li>• Includes North Piedmont Park, Piedmont Commons, and Piedmont Gardens.</li> </ul>	53.00	Potential proximity impacts as a result of visual and vibration impacts
Historic Fourth Ward Park at North Avenue	<ul style="list-style-type: none"> <li>• Planned public park in Old Fourth Ward neighborhood.</li> <li>• Planned primarily as a passive park with lakes, open meadows and a system of multi-use trails.</li> </ul>	40.00	Potential proximity impacts as a result of visual and vibration impacts
Cresthill Path	<ul style="list-style-type: none"> <li>• Wooded walking trail in Midtown area at 550 Cresthill Avenue NE.</li> <li>• Situated within Atlanta Development Authority (ADA) right-of-way, between western end of Cresthill Avenue roadway and existing railroad tracks.</li> <li>• Actively maintained by Cresthill Avenue neighbors in partnership with the Piedmont Park Conservancy.</li> </ul>	0.06	No impact

Freedom Park <sup>4</sup>	<ul style="list-style-type: none"> <li>Regional park at North Avenue NE/Moreland Avenue.</li> <li>Transportation right-of-way previously purchased by the Georgia Department of Transportation (GDOT) for the development of a new interchange.</li> <li>GDOT cancelled the interchange project because of public opposition, and the City of Atlanta transformed the space into a public park.</li> <li>In the Poncey-Highlands, Old Fourth Ward, Inman Park, and Candler Park neighborhoods.</li> <li>Popular among joggers, bicyclists, and dog-walkers.</li> </ul>	188.59	No impact
Cabbagetown Park <sup>5</sup>	<ul style="list-style-type: none"> <li>Neighborhood park at 701 Kirkwood Avenue SE.</li> <li>City of Atlanta designated this old school property was as greenspace in 1999.</li> <li>Includes a community center.</li> </ul>	3.10	No impact
Inman Park	<ul style="list-style-type: none"> <li>Garden park at Euclid Avenue/Edgewood Avenue NE</li> </ul>	0.28	No impact
Springvale Park	<ul style="list-style-type: none"> <li>Neighborhood park at Euclid Avenue/Waverly Way NE.</li> <li>Created in 1903.</li> </ul>	4.60	No impact
Lang-Carson Park	<ul style="list-style-type: none"> <li>Neighborhood park at 100 Flat Shoals Avenue SE.</li> <li>Includes a community center, basketball and tennis courts, a meeting room, weight room, arts and crafts room, aerobics studio, and exercise room.</li> </ul>	3.24	No impact

- 1 City of Atlanta Office of Parks <http://www.atlantaga.gov/government/> (accessed June 2008)
- 2 Peachtree Hills Park Civic Association [http://www.peachtree-hills.org/facility\\_list.asp](http://www.peachtree-hills.org/facility_list.asp) (accessed June 2008)
- 3 Piedmont Park Conservancy <http://www.piedmontpark.org/> (accessed June 2008)
- 4 Freedom Park <http://www.freedompark.org/> (accessed June 2008)
- 5 Cabbagetown Initiative Community Development Organization <http://www.cabbagetowninitiative.org/> (accessed June 2008)

Figure 4-19: Parks and Recreation (Piedmont Park Area)



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**APPENDIX C**  
**Agency Correspondence**

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# Georgia Department of Natural Resources

## Historic Preservation Division

Chris Clark, Commissioner

W. Ray Luce, Division Director and Deputy State Historic Preservation Officer  
34 Peachtree Street, NW, Suite 1600, Atlanta, Georgia 30303-2316  
Telephone (404) 656-2840 Fax (404) 657-1040 <http://www.gashpo.org>

July 7, 2009

Henry Ikwut-Ukwa  
Manager, Planning Initiatives  
Metropolitan Atlanta Rapid Transit Authority  
2424 Piedmont Road, N.E.  
Atlanta, Georgia 30324-3330

**RE: Atlanta Beltline: 22 Mile Loop  
Fulton County, Georgia  
HP-080729-001**

Dear Mr. Ukwa:

The Historic Preservation Division (HPD) has reviewed the report entitled *Assessment of Effects Report Atlanta BeltLine Northeast Quadrant, Atlanta, Fulton County, Georgia*, dated June 3, 2009, by Edwards-Pitman Environmental, Inc. Our comments are offered to assist state agencies and their applicants in complying with the provisions of the Georgia Environmental Policy Act (GEPA).

Based on the information provided in the assessment of effects (AOE) report, HPD concurs with the finding that the proposed project will have a **significant impact** on the Orkin-Rollins Building, which has been found to be eligible for the Georgia Register of Historic Places (GRHP), in accordance with GEPA and OCGA 12-3-50-58. The proposed project will result in a significant loss of the main building's frontage, including the landscaping and sign. The sign is original to the property, and although it has been altered over the years, it is still considered a contributing object within the proposed boundary of this eligible property. Additionally, the landscape, including the grass lawn, trees and shrubs, as well as the exterior front stairs and lower level patio, are also considered important elements of this property that will be impacted by the proposed project.

HPD does not concur that the proposed project will have no significant impact on the GRHP-eligible Atlanta Beltline Railroad corridor. HPD finds that the removal of the GRHP-eligible bridges spanning Ponce de Leon Avenue and Clear Creek will result in a **significant impact** to the eligible bridges and the eligible rail corridor, in accordance with GEPA and OCGA 3-50-58. Furthermore, HPD finds that a variety of proposed activities may result in a cumulative significant impact to the Beltline corridor, as the corridor will no longer convey its overall historic feeling, association, workmanship, or design. These include the cutting and grading of sections of the corridor, disturbance of the rail bed for installation of the new rail, the introduction of overhead wires along the new rail line, the construction of walls along the rail corridor, removal of the traffic signal, and the construction of rail stations along the corridor. While these items may be necessary for the construction of the proposed project and cannot likely be avoided, we feel they merit further consultation with our office as project plans and design concepts are more fully developed. Additionally, recordation of the corridor should take place prior to project construction to document the corridor as it currently appears.

HPD concurs that the proposed project will have no significant impact on the remaining historic properties in the project's area of potential effects (APE), on the condition that the following items are provided to our office for further consultation:

- Walls in several areas along the rail corridor are proposed and may be in view of several eligible and listed historic districts, including the Martin Luther King, Jr. Historic District, the Pylant-Drewry-Greenwood Historic District, the Ansley Park Historic District, and the Ponce de Leon-Ralph McGill Historic District. Please provide our office with additional information about these walls and how, or if, the walls will visually effect the historic properties within their view.

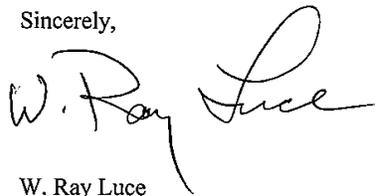
- Please provide additional information, photographs, or further analysis pertaining to how, or if, the new rail system (including the walls, overhead wires, stations) will visually affect historic residential properties that may be in view of the rail corridor.
- Please provide photographs of the stone wall that will be altered in the Virginia-Highlands Historic District.
- Please provide further analysis of potential visual impacts that may occur to the viewshed of Piedmont Park, including photographs of the areas where the rail corridor is currently visible from the park. Please also provide information about the trail system that Piedmont Park will construct to tie into the Beltline trail. Will this be a significant trail system, or minor in scope?

Furthermore, HPD concurs that the proposed project will have **no significant impact** on the eligible archaeological site 9FU77, based on the conditions proposed in the AOE document, which include archaeological monitoring of the area during construction.

When a significant impact on a historic property is found, the state agency should consult with the State Historic Preservation Officer on ways to avoid or reduce impacts to historic properties. HPD would like to make it clear that this determination of significant impact is not the end of the review process, and we would like to assist MARTA and Atlanta Beltline, Inc. in avoiding or minimizing this finding of significant impact to historic properties in the APE. We look forward to working with you as this project progresses and we are amenable to working with you towards an agreement for this portion of the project under GEPA that will facilitate your future consultation with us for the purposes of Section 106 of the National Historic Preservation Act. Such an agreement can incorporate our concerns and the proposals you provided at the end of the AOE for future consultation under Section 106.

Please refer to project number **HP-080729-001** in any future correspondence regarding this undertaking. If we may be of further assistance, please do not hesitate to contact Elizabeth Shirk, Environmental Review Coordinator, at (404) 651-6624, or Jackie Tyson, Environmental Review Historian, at (404) 651-6777.

Sincerely,



W. Ray Luce  
Division Director,  
Deputy State Historic Preservation Officer

WRL:jht

cc: Alan Tabachnick, AECOM, 516 E. State St., Trenton, NJ 08609  
David Adair, Edwards-Pitman Environmental, Inc.  
Le'Var Rice, ARC  
Doug Young, AUDC  
Boyd Coons, APC  
Jody Cook, NPS

### Agency Comments Received, GEPA Public Comment Period

<b>ID #</b>	<b>Agency</b>	<b>Commenter</b>	<b>Comment Date</b>	<b>Reference Page</b>
2009-0001	Georgia Dept. of Natural Resources, Environmental Protection Division, Air Protection Branch	Bert Pearce	May 14, 2009	A-9
2009-0002	Georgia Dept. of Natural Resources, Environmental Protection Division, Air Protection Branch	Jimmy Johnston	May 15, 2009	A-11
2009-0003	Georgia Dept. of Natural Resources, Environmental Protection Division, Watershed Protection Branch	Emily Wingo	June 1, 2009	A-12

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**APPENDIX D**  
**Notice of Decision**

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## NOTICE OF DECISION

for

### BeltLine Corridor Northeast Zone Project, Fulton County

This Notice of Decision, required by the Georgia Environmental Policy Act of 1991 (GEPA), documents the joint decision by the Metropolitan Atlanta Rapid Transit Authority (MARTA) and the Atlanta Development Authority (ADA) on the proposed construction of rail transit, multi-use trails, and ancillary facilities in the Northeast Zone of the BeltLine Corridor, between the existing Inman Park/Reynoldstown and Lindbergh Center MARTA stations.

**DECISION:** The Build Alternative for the BeltLine Corridor Northeast Zone consists of the construction of rail transit, multi-use trails, and ancillary facilities. Given that the BeltLine Corridor project design can avoid, minimize, or otherwise mitigate adverse effects on the environment, it is the decision of MARTA and the ADA to proceed with implementation of the Build Alternative.

Concurrent with this decision is an active federal process for environmental review, under the requirements of the National Environmental Policy Act (NEPA) for the entire 22-mile BeltLine Corridor that includes the Northeast Zone. The NEPA planning process incorporates a broader array of criteria to evaluate alternatives in the BeltLine Corridor. In accordance with Section 12-16-7 of GEPA, decisions on alternatives contained within a federally approved NEPA document shall supersede this GEPA decision if construction has not begun in the Northeast Zone.

In the absence of a superseding NEPA decision, MARTA and ADA will proceed with Transit and Multi-Use Trail Option 2 (access Lindbergh Center MARTA station north of Interstate 85, via Piedmont Road NE and Garson Drive NE) for implementation. Relative to the other alignment options, Option 2 produces the lowest potential effect to floodplains, interacts with relatively fewer hazardous materials and contaminated sites, and offers potentially greater benefit of generating pedestrian trips through the presence of an additional transit station at Piedmont Road NE.

All transit and trail alignment options will result in a significant impact to the Historic Railroad Resources of the Atlanta BeltLine. This finding results in part from the potential removal of historic bridges spanning Ponce de Leon Avenue NE and Clear Creek (south of Piedmont Avenue NE).

Option 2 will result in a significant impact to the Orkin-Rollins Building, an eligible historic property located at 2170 Piedmont Road NE. This finding results in part from the proposed action crossing above the pedestrian entrance to the building and requiring the displacement of elements contributing to the historic resource, including the Orkin-Rollins sign.

MARTA and ADA (via Atlanta BeltLine, Inc., the implementation agent for ADA) will maintain open consultation with the State Historic Preservation Office (SHPO), following the stipulations to be contained in a Memorandum of Understanding (MOU) between these agencies as the project design process continues.