

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