Draft Environmental Assessment

MARTA Five Points Station Transformation

November 2023

REVISION HISTORY

Revision Date	Revision Number	Sections Affected	Comments
November 1, 2023	1	Global Changes	Response to First Review from FTA
November 8, 2023	2	Reference to Five Points Station achieving significance.	Response to Second Review from FTA

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LIST OF ACRONYMS

ACS	American Community Survey
APE	Area of Potential Effects
BMPs	Best Management Practices
CAA	Clean Air Act
CEJST	Climate and Economic Justice Screening Tool
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CO	Carbon Monoxide
EA	Environmental Assessment
EJ	Environmental Justice
EO	Executive Order
EPA	Environmental Protection Agency
ES&PCP	Erosion, Sedimentation, and Pollution Control Plans
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GA EPD	Georgia Environmental Protection Division
GNAHRGIS	Georgia Natural Archaeological Historical Geographic Information System
HDC	High Density Commercial
MARTA	Metropolitan Atlanta Rapid Transit Authority
MOA	Memorandum of Agreement
MPO	Metropolitan Planning Organization
MSAT	Mobile Source Air Toxic
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NO2	Nitrogen Dioxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O3	Ozone
Pb	Lead
PM	Particulate Matter
RAISE	Rebuilding American Infrastructure with Sustainability and Equity
RCRA	Resource Conservation and Recovery Act
SGR	State of Good Repair
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SPI-1	Special Public Interest District
TIP	Transportation Improvement Plan
TRB	Transportation Research Board
TSCA	Toxic Substances Control Act
USC	United States Code
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency

1. Background and Purpose and Need

In partnership with the City of Atlanta (COA), the Metropolitan Atlanta Rapid Transit Authority (MARTA) proposes to demolish the existing canopy and plaza and then reconstruct and enhance these levels of the MARTA Five Points Station. The MARTA Five Points Transformation Project, herein referred to as the "Project", envisions a modernized Five Points Station that enhances the passenger experience by improving sight distances, wayfinding, and stormwater management, as well as providing a more integrated and inviting public space.

The Project is being funded as a part of the More MARTA Atlanta initiative, which is a referendum passed by COA residents in 2016 to invest in improvements to MARTA. An Intergovernmental Agreement (IGA) between MARTA and COA codifies the responsibilities of each party to deliver the More MARTA Atlanta program. The Project was awarded a RAISE Grant for $25 million in 2022. With the federal funding through the RAISE grant, the Project is being evaluated in accordance with the National Environmental Policy Act (NEPA) (43 U.S.C. § 4321) review process.

As a part of those procedures, FTA, as the lead Federal agency, must make a determination about the proposed project's potential environmental impacts in accordance with NEPA. This Environmental Assessment (EA) has been prepared in accordance with the FTA and FHWA Environmental Impact and Related Procedures (23 C.F.R. Part 771) and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 C.F.R. 1500) environmental review requirements. The EA has also been prepared in accordance with other applicable federal laws including, but not limited to, the following:

- Section 106 of the National Historic Preservation Act (NHPA) of 1966 (54 U.S.C. § 306108)
- Section 4(f) Requirements (49 U.S.C. § 303 and 23 U.S.C)
- Section 7 of the Endangered Species Act of 1973 (16 U.S.C. § 1531)
- Clean Water Act (33 U.S.C. § 1251)
- Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" and Executive Order 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All (April 21, 2023)

1.1 Project Background

MARTA operates the 12th largest public transit system in the US, carrying over 375,000 weekday patrons. Its rail system first opened in 1979 and has grown to 38 stations. Four lines serve these stations along north-south and east-west alignments. Five Points Station—located in downtown Atlanta—is the only station that connects all four lines. As such, it is the primary hub of MARTA's regional rail system. This system serves a significant disadvantaged travel market, with 27 percent of MARTA customers living on low incomes (less than 125 percent of federal poverty guidelines) and 40 percent without reliable access to an automobile.

One of eight original MARTA rail stations, Five Points Station opened in 1979, with a Brutalist architectural design that reflects the era in which it was built. At over 40 years old, major rehabilitation work is required. The Project seeks to do more than simply restore this station to a state of good repair, it will also use the opportunity to improve the station design to address recurring maintenance issues, enhance the customer experience and emphasize the station as a vibrant downtown transit hub. MARTA is engaged in two separate activities, below

ground improvements at the platform levels being implemented with only local funds, as part of MARTA's Station Rehabilitation Program and the Five Points Transformation on the concourse and plaza levels. The below ground improvements consist of state of good repair investments such as the installation of new floor and wall tiles, ceiling upgrades, escalator and elevator rehabilitation, cleaning of the Eiseman façade and installation of improved lighting within the station interior. MARTA initiated planning for the Station Rehabilitation Program in 2018 to revive several MARTA rail stations by improving the customer experience and replacing key features with new and easy to maintain materials.

The Five Points Transformation Project, which is the subject of this EA, is partially funded with a $25 million RAISE grant, along with state and local funds, to achieve MARTA's vision for an improved, modernized facility designed to enhance the customer experience at the above-ground portions of the station. These above-ground improvements modernize the plaza and concourse levels by constructing a new canopy to improve stormwater management and increase the availability of natural light and air at the plaza and concourse levels. The plaza level will also be modified to improve integration with the surrounding area, enhance wayfinding and safety, update the bus transfer facility, and provide improved pedestrian and bicycle access to the station.

1.2 Purpose and Need

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

1.2.1 Enhance Site Access and Safety

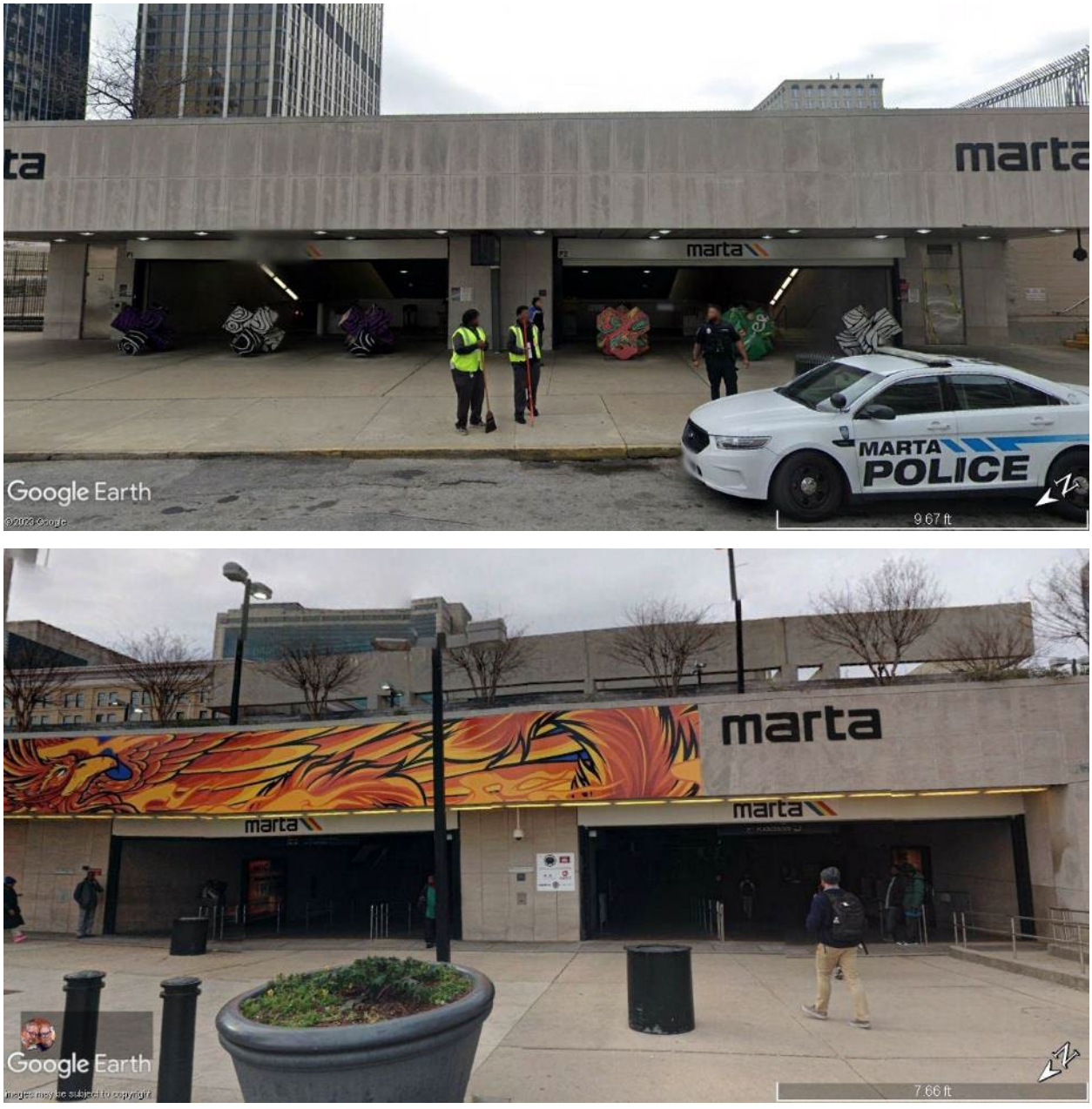
The current design of Five Points Station, which serves approximately 55,000 bus and rail customers daily, presents safety and security concerns for the customers and staff who use the station. These concerns primarily stem from the limited sight distance, grade changes, and walls that obstruct circulation and connectivity within the station and its surroundings.

The primary entrances to the concourse levels from Peachtree Street and Forsyth Street are dark and have a heavy overhang that gives the impression of entering a dark tunnel or cave, as depicted in **Figure 1**. The site's darkness from lack of natural light at the plaza level and entrances create limited visibility and make the area uninviting. The plaza level's columns and grade changes obstruct sightlines, resulting in potential blind spots for both riders and station personnel. These limitations not only impede effective monitoring by security personnel but also increase the risk of accidents and potential security threats from individuals seeking to exploit these blind spots for unauthorized purposes.

The existing grade changes create access issues for users, particularly those with mobility challenges who must navigate a labyrinth of stairs and ramps to enter/exit the station. The lack of direct connections between Alabama Street and the rail concourse degrades accessibility and connectivity for bus and rail passengers. The thick barrier walls surrounding the station impede riders' sightlines and limit integration of the station with the surrounding city center environment. This hinders access to and from the station and mobility within and across the entire plaza area.

To rectify these safety and site access concerns and enhance the overall experience for passengers and staff using the station, the proposed project would create seamless transitions from the street to the station entry/exit points, ultimately optimizing passenger flow and mitigating potential safety and access hazards. MARTA's objective is to open the plaza level to remove visual and physical barriers to cultivate an environment at Five Points Station that promotes intuitive wayfinding and a heightened sense of safety and security for all customers, fostering a positive perception of the station and its facilities.

FIGURE 1. FORSYTH STREET AND PEACHTREE STREET CONCOURSE ENTRANCES



1.2.2 Increase Natural Light and Air Circulation

The majority of the current station is subterranean, and the existing design restricts natural light and air circulation at the concourse level due to the presence of the covered plaza level above. The existing plaza and concourse levels are not air conditioned. The original design of the station included chiller plant equipment which provided air conditioning for the public facing areas on the concourse and platform levels of the station when opened in 1979. This chiller plant equipment was decommissioned in the mid 1990s as it was cost prohibitive to remain operational. The existing concrete canopy and roof structure limit natural light at the plaza level. The existing roof covers just over a half an acre. There is an existing skylight along the northern edge of the roof towards the Broad Street Plaza side and a circular skylight in the center of the roof, which is partially obstructed by other roof layers, substantially limiting the amount of natural light to the interior of the plaza. **Figure 2** shows the levels of Five Points Station, and **Figure 3** shows the existing roof. This lack of natural light contributes to darkness at the concourse level and limits visibility for passengers and wayfinding even with lighting in the entrances because of the design of the overhang and resulting tunnel effect. The darkness of the station presents an uninviting entrance to the center of the transit system in what otherwise could and should be an active vibrant public space in the heart of downtown. Additionally, the plaza and concourse levels are not an air-conditioned space and relies on natural air circulation that is hindered by the design of the plaza level openings. Increasing the amount of natural light and air circulation within the station is essential to improving the overall passenger experience and creating a safer and more inviting environment that, while covered and thus protected from the elements, is more open to the surrounding area. The integration with the surrounding area will allow the Project to incorporate design elements that provide more public space, make use of the increased natural light and enhance the concourse levels and subterranean levels by allowing better air circulation. The result will create a more pleasant and inviting atmosphere for passengers through the efficient use of daylight and passive ventilation strategies, such as taking advantage of natural forces from wind in a more open air environment and cross ventilation to facilitate air flow through the plaza and concourse levels.

FIGURE 2. STATION LEVELS AT FIVE POINTS STATION

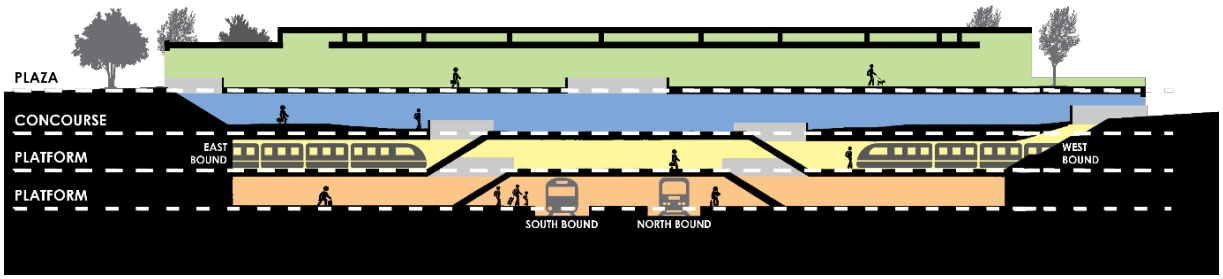
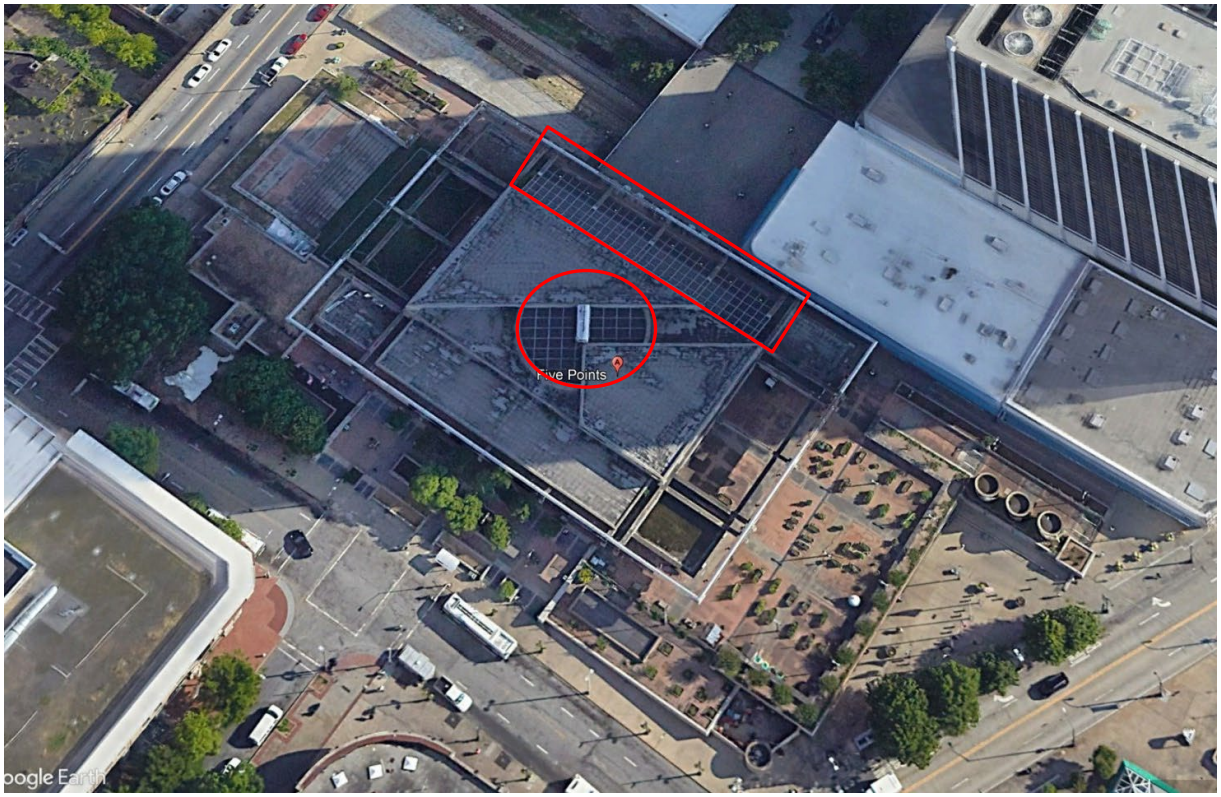


FIGURE 3. FIVE POINTS STATION AERIAL VIEW OF ROOF AND SKYLIGHTS



1.2.3 Modernize Facility

There are two primary needs to modernizing the facility. First, MARTA seeks to improve connectivity between bus and rail and better integrate the station with the downtown environment. Second, the deficiencies (as described below) of the canopy roof structure that result in significant leaking during rainfall events and degradation of the station must be addressed. The overall station conditions have worsened due to the passage of time as the station elements, including the roof, reach the end of their functional life. With concrete structures, deterioration can occur from water intrusion resulting in damage to internal steel reinforcement which can cause sudden failures. These issues may not be visually apparent and can continue to occur as the structure ages. Modernizing the facility involves both transforming the site into a more cohesive and welcoming station and bringing the station's design up to current standards for structural loads, wind loads, and seismic loads, which have all become more stringent since the station was constructed. Additionally, requirements for stormwater management and controls have also changed. As further explained below, the existing plaza is burdened by the inherent deficiencies in the design of the existing canopy roof, which lead to the leaking experienced today, as shown in **Figure 4** and **Figure 5**, and increased maintenance and repair costs. The need for massive supporting columns to support the existing canopy also impedes pedestrian travel through the station in the plaza and concourse levels because these columns limit sight lines which result in increased safety risks.

The complexity of the roof design, with troughs between deep double beams, and large flat sections that retain water (see **Figure 6**), puts stress on the structure and complicates maintenance efforts because of water retention, debris accumulation, and vegetation growth. The canopy roof is constructed from a series of prestressed precast concrete hollow core slabs supported by post-tensioned precast concrete beams. Due to the intricacies in the

method of construction, the complexity of the system does not lend itself to cutting or rearranging of individual concrete elements, which means individual areas of the beams cannot be replaced. Therefore, a simple repair is not possible and the entire slab would need to be reconstructed to address any structural deficiency identified in the future. Details on the canopy roof condition can be found in Appendix A. The plaza level support beams are overloaded (see Concept Report, Appendix B) and although this is not a current safety deficiency, this condition can lead to cracking which can lead to further deterioration of the overall structure compromising its structural integrity. New plaza and roof designs that improve wayfinding and circulation and prevent water pooling and retention are essential to prevent further and repeated deterioration of the canopy and ensure the safety and functionality of the station by eliminating the chronic water leaks from the canopy experienced today. The new design would also allow for future repair of modular elements where needed, in contrast to the challenges posed by the existing design. By addressing these issues at this time, the Project aims to provide a modern facility that will be more resilient, easier to maintain, and easier to navigate.

FIGURE 4. EXAMPLE OF WATER CONDITIONS ON THE CONCOURSE LEVEL AFTER A STORM EVENT

FIGURE 5. EXAMPLE OF THROUGH LEAKING DAYS AFTER A STORM EVENT THAT IMPEDES STATION MOBILITY

FIGURE 6. WATER RETENTION ON FLAT ROOF

1.3 Project Description

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

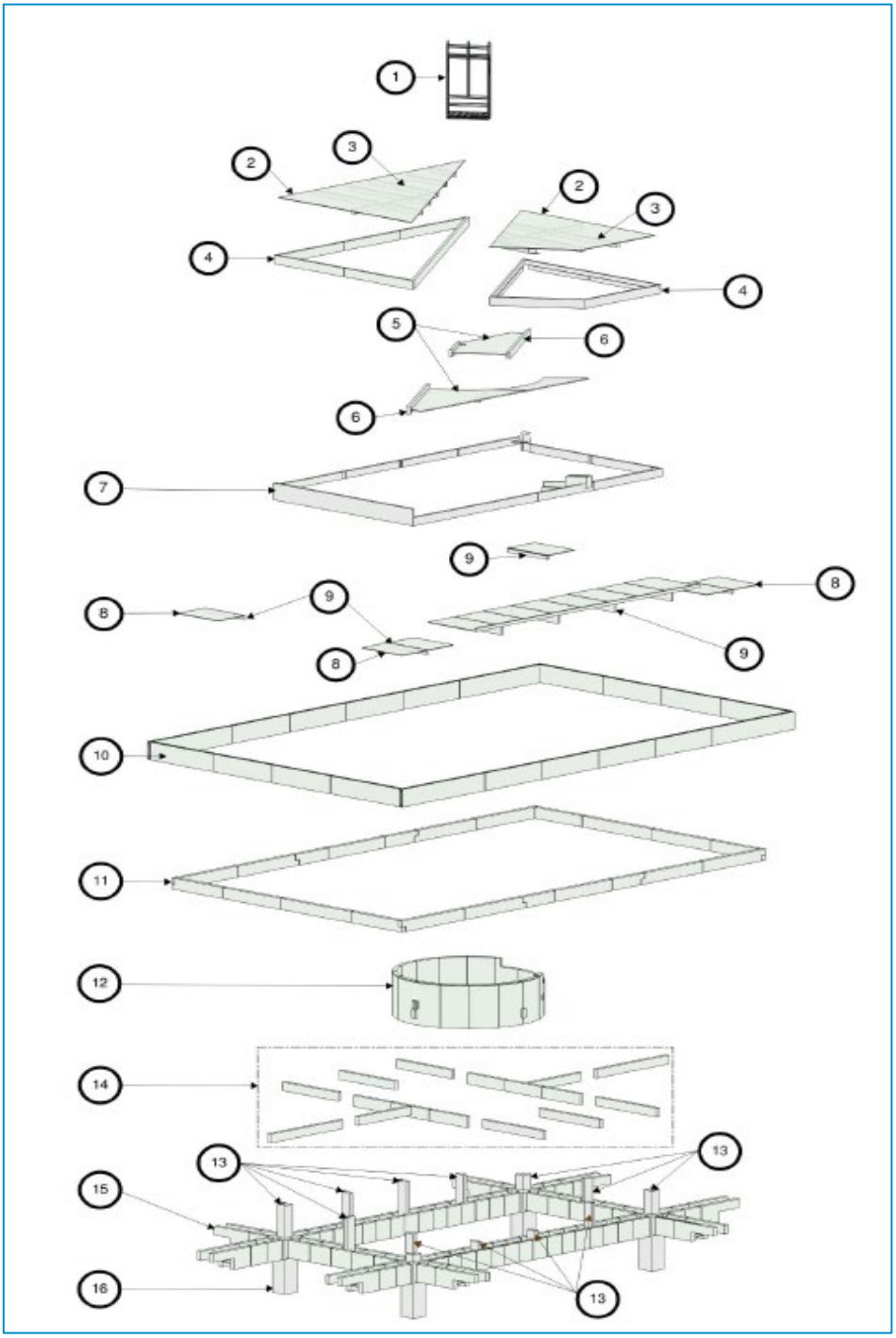
The plaza level emphasizes north-south pedestrian connections at Broad Street via two lightweight bridges. The redesign would demolish the existing concrete canopy and replace it with an arched timber roof canopy with solid roof or glass panels, and deep overhangs. The timber components are completely covered by the panels for weather protection and at the canopy edges, protective caps will be used to shield the timber ends. The design for the timber beams is a “dry service use” which means it is not directly exposed to the weather elements, and the timber material will be resistant to mold, rot and insect repellant. The canopy structure would be supported by structural steel V-shaped columns that would rest on existing station columns, minimizing the impact of the canopy supports on the base station structure. The canopy has been designed to prevent water penetration to the

concourse below. The arched roof will be constructed of series of panels connected with standing seams, an industry standard product with overlapping joints to prevent water intrusion. The new canopy has been designed to address the potential intrusion of driving rain with the canopy structure extending beyond the concourse openings along all of the edges. The proposed canopy is curved to promote natural water shedding along the north/south eaves of the canopy. A robust gutter system will be installed and will be easily accessible for maintenance. The proposed sloped top cap, below the finished roof and along the length of the timber girders, will prevent any standing water from accumulating along the top face of the timber girder and will guide any potential water infiltration away from the edges. The new design also includes bird protection along the top of the timber girders to prevent birds from nesting along and damaging the timber members.

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

The existing canopy structure is comprised of a system of concrete beams in four levels ranging from twenty-eight feet to forty-eight feet above the station's plaza slab; it is two-hundred sixty-two feet, ten inches (262' 10") in the east-west direction and one-hundred sixty-seven feet, two inches (167' 2") in the north-south direction. The canopy structure acts as a roof that covers the plaza level entrances and concourse level partially at the plaza slab opening. This entire roof system is supported by four, eight-foot by eight-foot reinforced concrete columns that are socketed into bedrock at the station's foundation level below. These columns are supported at the top of the plaza slab level by steel bearing plates that weigh approximately ten tons. There are eight main, ten-foot (10') deep, post-tensioned girders that run between these columns that cantilever forty to fifty-three feet (53') past the concrete columns to support the remainder of the roof canopy framing and act as the lateral stability system of the structure. Overall, the concrete beams are precast, post-tensioned beams that are supported on other precast, post-tensioned beams. The one exception is the exterior concrete fascia beams, which run along the exterior of the canopy structure. These beams are not post-tensioned; they are reinforced with steel rebar and steel welded wire fabric. Per the structural engineering study, the canopy will be demolished in the reverse order of construction while carefully understanding the change of load path induced at each stage (as shown in **Figure 7**). The conceptual design elements are shown in **Figure 8-13**.

FIGURE 7. CANOPY DECONSTRUCTION PROCESS



1. Removal of solar sign structure
2. Removal of Level IV and III precast pretensioned planks
3. Removal of Level IV and III precast pretensioned secondary beams
4. Removal of Level IV and III precast pretensioned perimeter beams
5. Removal of Level II precast pretensioned planks
6. Removal of Level II precast pretensioned beams
7. Removal of Level II precast pretensioned perimeter beams
8. Removal of Level I precast pretensioned planks
9. Removal of Level I precast pretensioned secondary beams
10. Removal of Level I fascia girders
11. Removal of Level I precast post-tensioned perimeter beams
12. Removal of Drum
13. Demolition of cast-in-place concrete columns above Level I
14. Removal of precast post-tensioned beams
15. Segmental removal of main precast post-tensioned girders
16. Demolition of concrete columns to plaza level

FIGURE 8. PROPOSED PROJECT AERIAL RENDERING

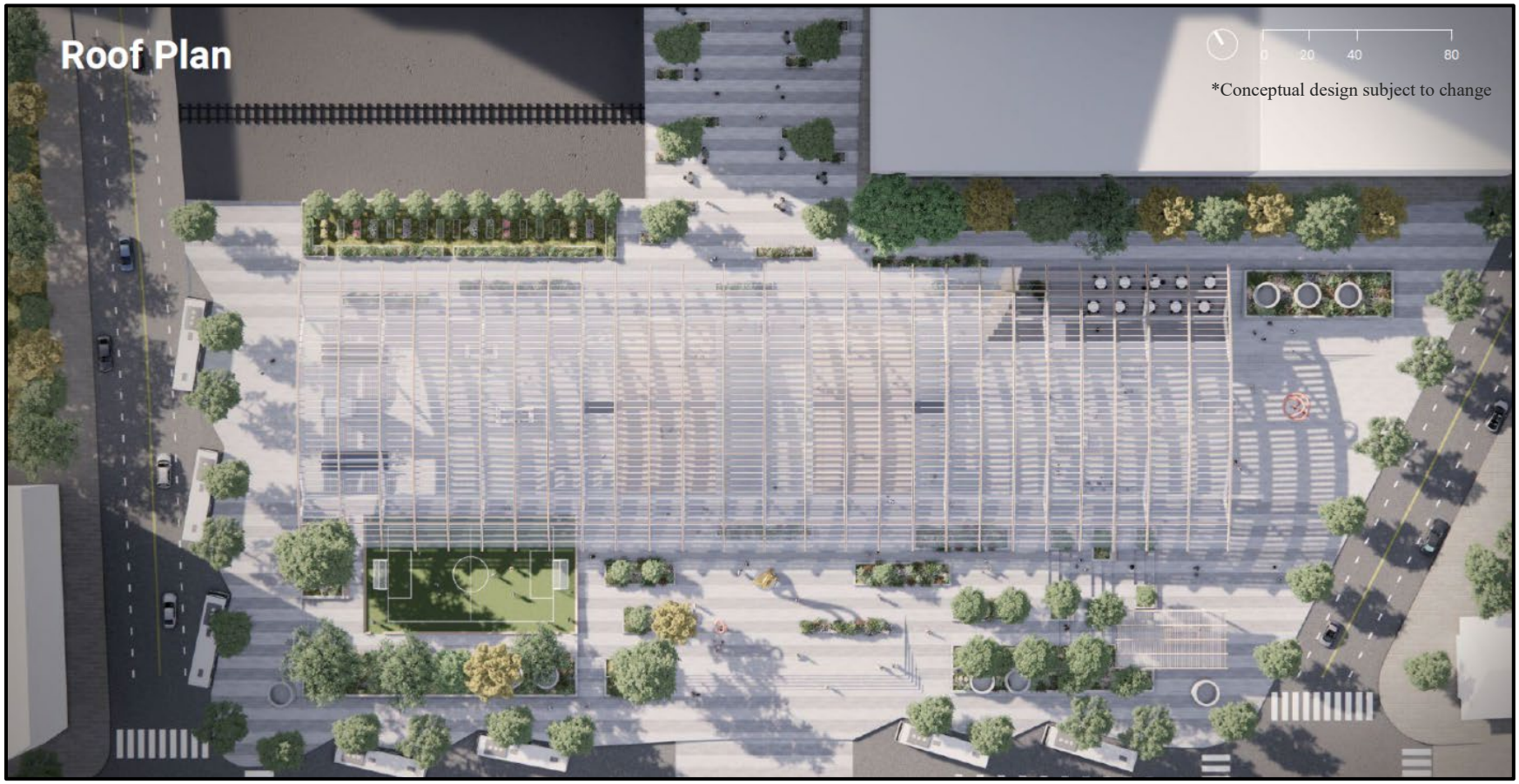


FIGURE 9. PROPOSED PROJECT AERIAL RENDERING WITH LIFTED ROOF

FIGURE 10. PROPOSED PROJECT PLAZA RECONFIGURATION

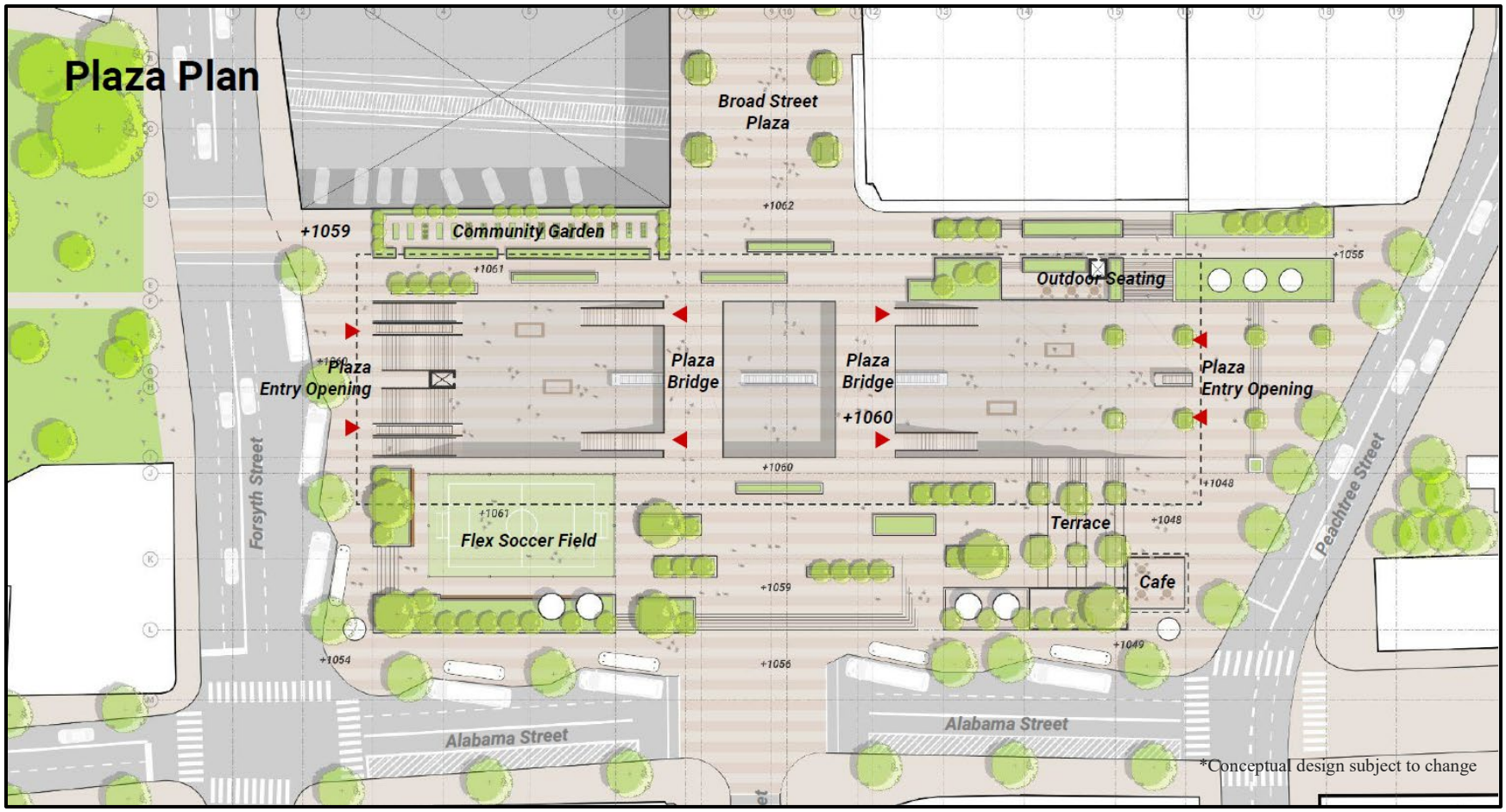


FIGURE 11. PROPOSED PROJECT BUS LAYOUT

FIGURE 12. EXISTING STRUCTURE DEMOLITION PLAN

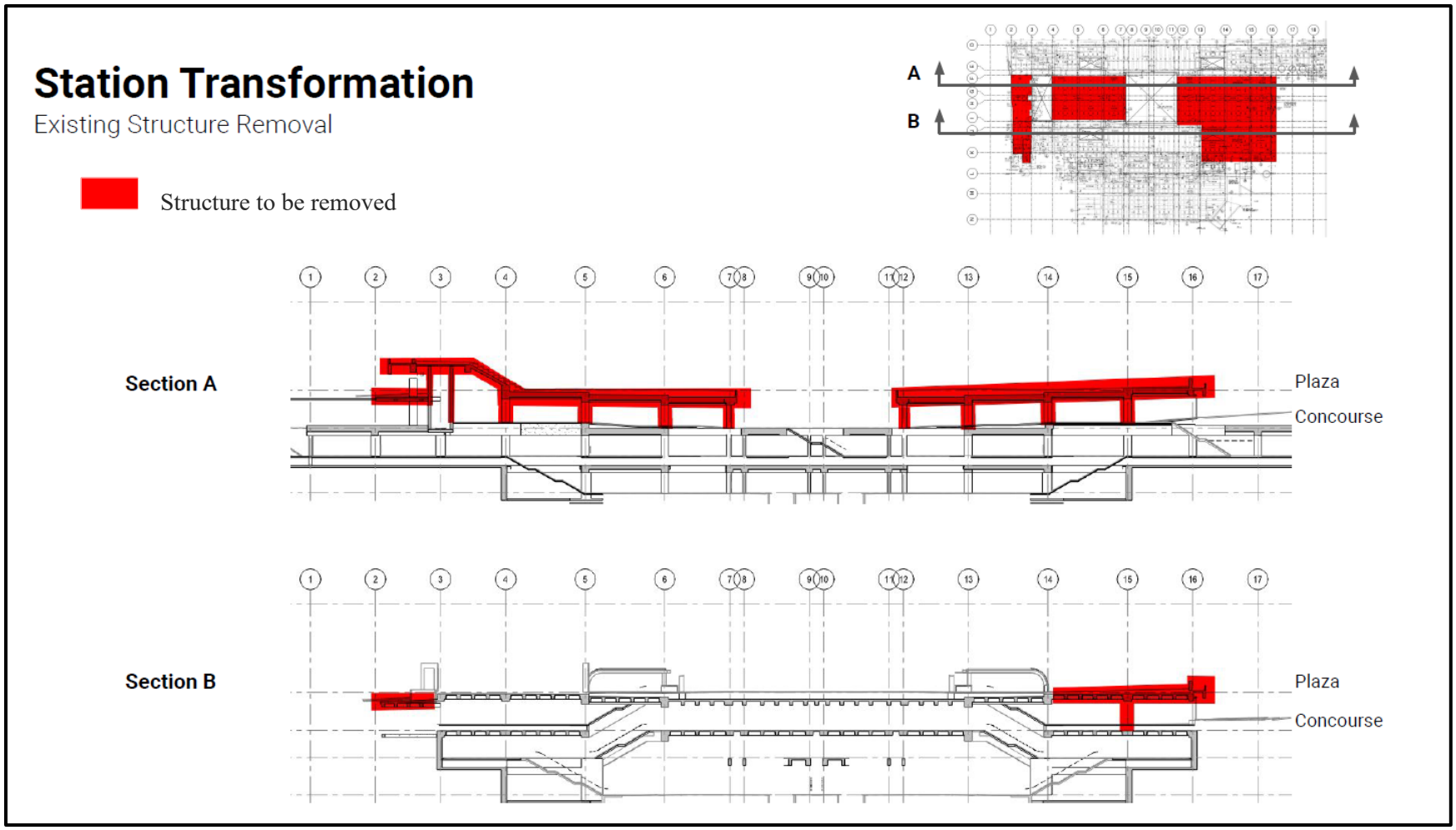
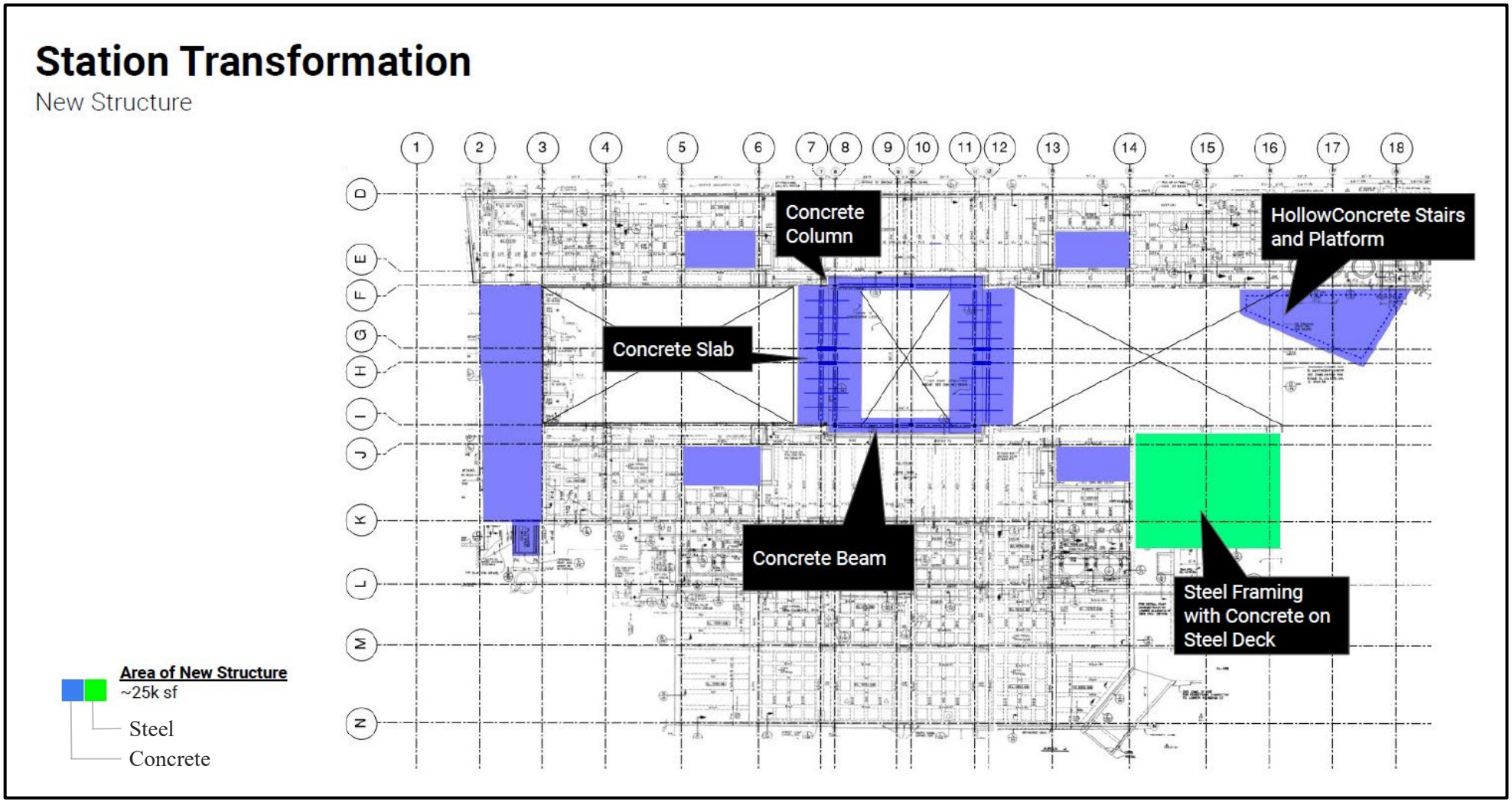


FIGURE 13. NEW STRUCTURE PLAN

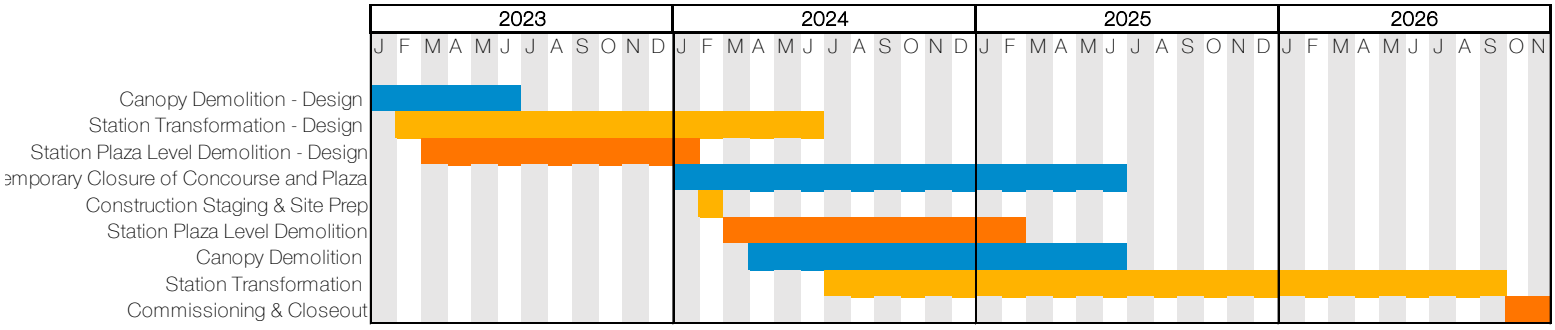


1.3.1.1 CONSTRUCTION PROCESS AND SCHEDULE

The demolition of the existing canopy and the construction of the plaza will result in an approximately 18-month temporary closure of the plaza and concourse levels during construction. Construction activities will require a work platform on Five Points Station property. Temporary scaffolding will be constructed for the work platform and temporary roof structure. As described in the Project description, the existing canopy must be systematically dismantled and sequenced to minimize impacts. The use of the work platform will minimize construction time by allowing concurrent demolition of the canopy and reconstruction of the plaza level. The types of equipment to be used during construction include a tower crane, crawler crane, wet saws, and other equipment for the strategic and careful demolition of the canopy. A non-potable water truck will be on site to support dust mitigation. Dumpsters and dump trucks will be on site to remove materials. Staging will occur on Alabama Street. Forsyth Street and Peachtree Street will not be closed. Upon completion of final design, more detailed construction plans, staging requirements and phasing will be provided.

Figure 14 shows an estimate of the construction for the Project based on conceptual design. The final construction schedule is dependent upon the final design and confirmation of construction means and methods. Ongoing outreach with stakeholders and project partners is being conducted and public outreach will be conducted prior to the start of construction activities to inform the public of station closures and service modifications.

FIGURE 14. PROJECT CONSTRUCTION SCHEDULE AND PHASING



The selected contractor responsible for construction will be required to meet the specifications established by MARTA, including mitigation defined in the EA. MARTA will oversee the construction process and have final responsibility for project implementation. In addition to the contract documents, the contractor will be required to comply with other building codes and standards, including those of federal, state and local jurisdictions.

Rail service through Five Points Station will remain in service and transfers will be permitted on the platform levels during construction. The plaza and concourse levels will be temporarily closed through the construction process. Changes during the final design process may require an environmental re-evaluation. If there are changes to the reported impacts, these will be reviewed at key design milestones and coordinated with FTA for compliance.

1.4 Project Alternatives

This EA compares two alternatives: the No Build Alternative and the Build Alternative. MARTA conducted a planning feasibility analysis to consider alternatives for Five Points station transformation and identified a preferred concept option. The preferred concept was developed based on the following guiding principles, which are consistent with the Project Purpose and Need identified in **Section 1.2** and include:

- Circulation: provide seamless transit connectivity and connect flows of people
- Safety: Negotiate grade change, improve sightline, and enhance perception of safety
- Activation: Support a diverse collection of programs, including public art, performances, Station Soccer and other community programs
- Passenger Comfort: Increase access to natural light and fresh air to the station below.
- Civic Heart: Create a vibrant beacon for downtown Atlanta.

1.4.1 No Build Alternative

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

1.4.2 Alternative Considered but Dismissed

MARTA considered an alternative that would repair the existing canopy and plaza area, but ultimately it did not meet the Project purpose and need. Under this alternative, the canopy roof structure and plaza configuration would be retained with necessary repairs to minimize and address leaking conditions and maintenance issues.

Retaining the canopy by repairing it will not address the inherent flaws in its flat roof design, which exacerbates maintenance needs because of issues caused by storm events that lead to water retention and leaking.

Additionally, repairing the existing roof structure as designed and maintaining the plaza configuration would continue to inhibit natural light at the plaza and concourse level. At the plaza level portions of the skylight are obstructed by the roof, and the existing plaza extends over the concourse level, limiting both natural light and air circulation. As noted previously, a canopy repair will not address the increased maintenance required by the current design. The troughs and flat roof design will continue to cause water pooling that will lead to deterioration of the roof and the recurrence of the roof leaks that are experienced today. A restored roof and plaza would also not fulfill the goals of the Project to increase natural light at the plaza and concourse levels, nor will it allow for improved safety and site access because the large supporting columns would need to retained, eliminating the ability to remove these visual and physical barriers that hinder passenger wayfinding and circulation. Retaining these features would preclude any substantial alterations and would not meet the Project's intent of improving the passenger experience by creating a more engaging and active public space. The existing plaza configuration also features grade changes that further limit site access, navigation, and visibility for customers and MARTA staff.

1.4.3 Build Alternative

The Project is within the existing limits of the Five Points Station property. The Build Alternative will renovate and modernize Five Points Station and reconfigure the site for better mobility, operations, maintenance, and safety. The following physical elements are included in the Build Alternative as discussed in the Project Description in **Section 1.3**.

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

The Project concept is provided in Appendix B. The Project would be constructed within the existing footprint of the MARTA Five Points Station and does not propose changes to transit operations for bus or rail service.

1.5 ENVIRONMENTAL ANALYSIS

The following sections describe the existing conditions, impacts and mitigation measures as appropriate for the No Build and Build Alternatives described in Section 1.4. Each of the following sections describes the existing condition, description of the methodology and governing regulations, and permanent and construction impacts. The following environmental resources are addressed in the following sections:

- Transportation
- Air Quality
- Hydrology and Water Quality
- Environmental Justice
- Visual and Aesthetic Conditions
- Historic Resources
- Natural Resources
- Noise and Vibration
- Hazardous Materials
- Safety and Security
- Utilities
- Indirect and Cumulative Impact

Based on agency coordination, database searches, site visits and analyses, the following resources were not found within the Project area are not evaluated in this document:

- Land Use
- Socioeconomics
- Neighborhoods and Community Resources
- Land Acquisitions and Relocations
- Surface Waters
- Floodplain Management
- Wetlands
- Navigable Waterways
- Coastal Zones
- Farmlands

2. Transportation

This section summarizes the existing conditions and potential impacts of the Project on the transportation system. Supporting documentation on bus and traffic analyses is provided in Appendix C.

2.1 Methodology

MARTA conducted a transportation analysis of the study area based on existing information from MARTA Service Planning and the City of Atlanta, as well as data collected for the traffic analysis conducted in August 2021 on multiple site configurations and updated in May 2023 to reflect the Project.

2.2 Existing Conditions

Five Points Station serves nearly 55,000 passengers a day, with about 37 percent rail ride-throughs, 32 percent rail transfers, 22 percent walk up access, 7 percent rail bus transfers and the remaining 2 percent as bus-to-bus transfers. There is no parking at Five Points Station, and the station can be accessed on all sides with sidewalk and signal-controlled crosswalks.

2.2.1 Public Transportation

Five Points Station is the transit hub of the MARTA system, intersecting all rail lines north/south and east/west. Five Points Station is an important bus destination and key element of the MARTA network because of this direct connection to all four rail lines. The majority of the bus service to Five Points Station is run by MARTA. MARTA operates ten routes for about 19 hours per day, 7 days per week. Seven of these routes terminate on the bus only section of Alabama Street and three routes – numbers 3, 40, and 813 – run through the area and terminate elsewhere.

Within the downtown area, only two local routes (107and 899) and some university shuttles do not serve Five Points Station. Refer to the Appendix to see available bus connections at Five Points Station. See **Table 1** for a summary of the MARTA bus routes at Five Points Station.

TABLE 1. SUMMARY OF MARTA BUS SERVICE AT FIVE POINTS STATION

	MARTA Routes	Weekday Trips Operated	Weekend Trips Operated	Peak Vehicles per Hour
Services Terminating at Five Points Station	21 – Memorial Drive	93	71	3
	26 – Marietta Street / Perry Boulevard	59	57	1½
	42 – Pryor Road	66	58	2
	49 – McDonough Boulevard	102	72	4
	55 - Jonesboro Road	96	74	3
	186 – Rainbow Drive / South DeKalb	93	70	4
	816 – North Highland Avenue	50	49	1⅓
Through-Routed Services at Five Points Station	3 – Martin Luther King Jr. Drive / Auburn Avenue	51	48	2⅔
	40 – Peachtree Street / Downtown	48	46	2⅔
	81 – Atlanta University Center	57	55	3

Aside from MARTA, regional transit operators also serve Five Points Station. Xpress and CobbLinc through-route express services through the area during the morning, operating on Forsyth Street and Peachtree Street with stops less than a block from station entrances. Gwinnett County Transit also operates nearby, making stops a block away on MLK Jr Drive. These services are designed around peak-period commutes from suburban counties outside of MARTA's service area and operate primarily in the morning and afternoon peaks. When these services are accounted for, Five Points Station also serves as an important regional connection point from the greater Atlanta metro area to MARTA's rail and bus service.

2.2.2 Traffic Conditions

There are high volumes of pedestrian traffic in and around the station because it serves as the central hub for bus and rail service. The pedestrian traffic affects left and right turning vehicular movements at intersections which also affects bus operations. The concourse entrance on Peachtree Street, the plaza entrances with the wide staircase opening onto Alabama Street, and the Broad Street North entrance are the locations with the highest pedestrian activity.

The heavy bus circulation and frequent staging/layover contribute to intersection delays especially during the AM and PM peak hours that have shorter bus headways. The Level of Service (LOS) where Alabama Street intersects Forsyth Street as well as Peachtree Street is greatly affected as many passengers exit the station from the Alabama Street access point to make bus transfers. Another issue along Alabama street is the non-compliance of other vehicles turning on to Alabama Street even though it is a bus only street. Additional information on the traffic conditions can be found in Appendix C.

2.3 Environmental Impacts

2.3.1 No Build Alternative

With the No Build Alternative, the existing conditions remain unchanged. The results indicated that the No Build Alternative would not change or benefit traffic operations during peak periods – both AM and PM, and the changes in delay time or level of services were marginal across intersections.

2.3.2 Build Alternative

The Project would improve bus conditions with the proposed improvements that include:

- Moving bus bays station-side, where MARTA has greater control over the waiting environment.
- Providing continuous cover between boarding/alighting areas and the station interior.
- Condensing bus staging areas by converting bus bays to sawtooth configurations and utilizing bus-only lanes.
- Improving pedestrian safety around the bus bays by consolidating crossing locations and shortening the distance pedestrians must cross.
- Providing for bus circulation around the station, to afford passengers more direct routing to and from the station, and to provide resiliency during events or emergencies which might close various streets.

2.3.2.1 PERMANENT IMPACTS

The build alternative would not result in any adverse impacts to pedestrian activity and bus connections to the station. It will have the following impacts that benefit pedestrian activity and bus connections to the station:

- Relocation of curb into property right-of-way to accommodate new sawtooth bus bays for ease of access.
- Relocating existing crosswalk at the intersection of Forsyth Street at Alabama Street to improve safety.
- Reconstruction of curb ramps at Forsyth Street and Alabama Street to improve safety and connectivity.

2.3.2.2 CONSTRUCTION IMPACTS

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

3. Air Quality

This section summarizes the qualitative assessment of the short-term and long-term effects of the Project on air quality related to construction.

3.1 Methodology

The Clean Air Act of 1990 (42 U.S.C. § 7401 et seq.) require the U.S. Environmental Protection Agency (USEPA) set National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. U.S. EPA has established NAAQS for six principal pollutants, which are called "criteria" pollutants. These pollutants are carbon monoxide (CO), nitrogen dioxide (NO2), ozone (O3), lead (Pb), particulate matter at both 10 microns (respirable particulate matter; PM10) and 2.5 microns or less (fine particulate matter; PM2.5), and sulfur dioxide (SO2). In addition to the NAAQS, the CAA requires U.S. EPA to regulate MSAT. MSATs are a subset of air toxics, which include nine compounds emitted from highway vehicles, trucks, buses, and non-road equipment. Diesel particulate matter remains the dominant MSAT of concern for highway and other transportation projects. The Transportation Conformity Rule (40 CFR Part 93, Subpart A) requires that projects that are developed, funded or approved by U.S. DOT and by Metropolitan Planning Organizations or other recipients for federal funds demonstrate conformity with the State Implementation Plan (SIP) developed pursuant to the CAA. A determination of conformity is made by the MPO and U.S. DOT. The Rule also identifies "Exempt Projects," which includes "reconstruction or renovation of transit buildings and structures (e.g., rail or bus buildings, storage and maintenance facilities, stations, terminals, and ancillary structures)".

Although this project is exempt from a conformity analysis, MARTA conducted a qualitative assessment of the Project related to air quality standards to assess the potential for short-term construction impacts.

3.2 Existing Conditions

Five Points Station is located in an attainment area and no permanent modifications to the bus routes or changes to the number of buses serving the site are proposed as part of the Project. The current routes will be relocated to neighboring rail stations during construction. The changes will not add new buses to the system. The Project is identified in the 2020-2025 TIP as part of Amendment #8 as M-AR-457.

3.3 Environmental Impacts

3.3.1 No Build Alternative

There would be no change to Air Quality under the No Build Alternative.

3.3.2 Build Alternative

3.3.2.1 PERMANENT IMPACTS

There would be no permanent impacts to Air Quality as a result of the Project as there are no changes to bus service or changes to the traffic conditions around the station. The Project would not introduce new sources of pollutants.

3.3.2.2 CONSTRUCTION IMPACTS

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

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

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

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

Site Preparation/Demolition:

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

Construction:

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

Post-Construction:

- Remove unused material
- Remove debris piles

4. Hydrology and Water Quality

This section documents water quality and stormwater treatment requirements including discussion of changes in impervious surface.

4.1 Methodology

The Georgia Water Quality Control Act (Georgia Laws 1964, p.416, as amended) and the Federal Clean Water Act, as amended (33 U.S.C. 1251 et seq.) set the requirements for addressing new and existing stormwater point sources within the State of Georgia that are required to have a permit and the procedures to authorize stormwater discharge under The National Pollutant Discharge Elimination System (NPDES) associated with construction activity to the waters of the State of Georgia. The site was assessed to understand potential changes to stormwater discharge and the permit requirements.

4.2 Existing Conditions

The overall station property is about 2.5 acres and is approximately 96 percent impervious surface. There is an existing trench drain around the plaza opening and various area drains around the plaza that connect to pipes on the Broad Street bridge which tie to the roadway stormwater network on Marietta Street. Over the years, this system proved deficient to fully capture and safely convey all stormwater from the plaza and a second system was retrofit to direct water through the station to drop inlets at the track level. The site was designed for surface flow to the southside of the site for collection in existing municipal storm drains on Alabama Street. As the State of Georgia and City of Atlanta have both implemented stricter standards for water quality and retention of surface flow resulting from impervious surfaces since the station was built, the existing stormwater facilities of Five Points Station do not meet current city or state storm water requirements.

4.3 Environmental Impacts

4.3.1 No Build Alternative

The No Build Alternative would not change from the existing condition and would have no impact. The No Build option would not bring the area to current standards for stormwater management.

4.3.2 Build Alternative

The Build Alternative has ground disturbing activity and all disturbed areas will be treated with appropriate Best Management Practices (BMPs) in accordance with Georgia Erosion and Sediment Control Act and NPDES General Permit requirements. BMPs that might be used include inlet sediment traps, curb inlet filters, and concrete washout systems. The BMPs will be detailed in the final design's Erosion, Sedimentation, and Pollution Control Plans (ES&PCP) and preliminary options are in Appendix B. The conceptual design includes new drainage features on the site to collect water, routing it away from the plaza and concourse levels and reducing the surface flow. The proposed drainage improvements will route stormwater to existing storm drains to the west, east, and south of the site. The concept design utilizes planters to reduce overall stormwater runoff. The proposed layout will both reduce the overall impervious area on the site by over 3,000 square feet and will treat water in the

new pervious areas to exceed runoff reduction requirements for the minimal land disturbance anticipated and will be in the final design plans.

5. Environmental Justice

As outlined in FTA Circular 4703.1 and Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, USDOT and FTA are required to make Environmental Justice (EJ) part of their mission by identifying and addressing disproportionately adverse human health or environmental effects of their actions on minority and low-income populations to the greatest extent practicable and permitted by law. EO 12898 seeks the "fair treatment and meaningful involvement of all people regardless of race, color, sex, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations, and policies" (U.S. Environmental Protection Agency) Executive Order (E.O.) 14096—"Revitalizing Our Nation's Commitment to Environmental Justice for All" was enacted on April 21, 2023. Executive Order 14096 on environmental justice does not rescind E.O. 12898, which has been in effect since February 11, 1994 and is currently implemented through DOT Order 5610.2C and FTA Circular 4703.1. This implementation will continue until further guidance is provided regarding the implementation of the new E.O. 14096 on environmental justice.

Meaningful involvement means that: 1) potentially affected community residents have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health; 2) the public's contribution can influence the regulatory agency's decision; 3) the concerns of all participants involved will be considered in the decision-making process; and 4) the decision makers seek out and facilitate the involvement of those potentially affected. The analysis was prepared in compliance with the following EOs, regulations, and guidance:

- EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (February 11, 1994)
- EO 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All (April 21, 2023)
- USDOT Order 5610.2(a), Order to Address Environmental Justice in Minority Populations and Low-Income Populations (May 2, 2012)
- Circular FTA C4703.1, Environmental Justice Policy Guidance for Federal Transit Administration
- Recipients (FTA 2012).
- EO 13166, Improving Access to Services for Persons with Limited English Proficiency

5.1 Methodology

The framework for the EJ evaluation incorporated in this EA is based on FTA C4703.1, described above, which outlines a methodology that addresses EO 12898 including both a robust public participation process and an analytical process with three basic steps:

1. Determine whether there are EJ populations potentially affected by the Project.
2. If EJ populations are present, consider the potential effects of the Project on the EJ population, including any disproportionately high and adverse effects.

3. Determine whether any adverse effects could be avoided, minimized, or mitigated.

American Community Survey (ACS) data from the Bureau of the Census and information from the Justice40 Climate and Economic Justice Screening Tool were used to analyze data from Census Tracts within a ¼ mile of this station. This includes two Census Tracts: 13121003500 and 13121011901. The terms "minority" and "low-income" are defined by FTA Circular 4703.1. Minority includes persons who are American Indian/Alaska Native, Asian, Black/African American, Hispanic/Latino, and Native Hawaiian and other Pacific Islander. Guidance from the U.S. Environmental Protection Agency indicates that EJ populations may be present when the minority population in the defined study area is greater than 50 percent or is meaningfully greater than the minority population percentage in the general population.

Low-income populations are those earning less than twice the federal poverty level. The federal poverty level as published by the Department of Health and Human Services for 2022 was $ 13,590 for an individual, and twice that would be $27,180. For a household of two people, it would be $ 18,310 and twice that would be $36,620.

5.2 Existing Conditions

5.2.1 Low-Income Population

The City of Atlanta has an average household size of 2.06 and, using data from ACS (2022 estimates), MARTA assessed the number of households with an income less than $35,000. Approximately 737 households, or 34 percent of households in the study area are considered low-income (see **Table 2**). This corresponds with the City of Atlanta low-income population of 34.2 percent, 27.4 percent in Fulton County, and 32.2 percent for the State of Georgia.

TABLE 2. SUMMARY OF LOW-INCOME POPULATION IN THE STUDY AREA

Household Income Range	Number of Households	Percentage of Total
Less than $10,000	229	11%
$10,000 to $14,999	115	5%
$15,000 to $24,999	283	13%
$25,000 to $34,999	110	5%
$35,000 to $49,999	367	17%
$50,000 to $74,999	452	21%
$75,000 to $99,999	208	10%
$100,000 to $149,999	291	14%
$150,000 to $199,999	44	2%
$200,000 or more	42	2%
Grand Total	**2,141**	**100%**
Total Under $35,000	**737**	**34%**

5.2.2 Minority Population

Sixty-seven percent of people in the study area are minority, a group that excludes populations that are non-Hispanic and white-alone. The share of minority residents in the study area is higher than that in the City of Atlanta (59%), Fulton County (61%) and state of Georgia (49%). In November 2022, the White House released the Climate and Economic Justice Screening Tool (CEJST) to support the Justice 40 Initiative. The tool identifies Census tracts that are disadvantaged. Communities are considered disadvantaged:

- If they are in census tracts that meet the thresholds for at least one of the tool's categories of burden, or
- If they are on land within the boundaries of Federally Recognized Tribes

Data is compiled based on the following categories of burdens: climate change, energy, health, housing, legacy pollution, transportation, water and wastewater and workforce development. A community is considered disadvantaged if it is in a census tract that is (1) at or above the threshold for one or more environmental, climate, or other burdens, and (2) at or above the threshold for an associated socioeconomic burden. One tract in the study area is considered disadvantaged, as shown in **Table 3**.

TABLE 3. SUMMARY OF MINORITY POPULATION IN THE STUDY AREA

Race/Ethnicity	Population Total	Percentage of Total
White	1,830	33%
Black or African American	3,236	58%
American Indian and Alaska Native	0	0%
Asian	132	2%
Native Hawaiian or Pacific Islander	0	0%
Other	41	1%
Two or more races	132	2%
Hispanic or Latino	217	4%
Disadvantaged Census Tract(s)?	**Yes - 13121003500 (Fulton County Tract 35)** **No - 13121011901 (Fulton County Tract 119.01)**	

5.3 Environmental Impacts

Tract 13121003500 is identified as a disadvantaged community in the CEJST, which is the tract that covers most of the station property and the area of south downtown. In addition to the area being identified as low income, it is determined disadvantaged because of other burdens as well including lack of green space and traffic volumes, both of which are addressed by the Project.

5.3.1 No Build Alternative

Under the No Build Alternative, no construction activities would occur and therefore, there would be no adverse impacts. The benefits associated with increased natural light and air circulation and enhanced safety and accessibility to reliable transit would also not be realized.

5.3.2 Build Alternative

5.3.2.1 PERMANENT IMPACTS

The Project would modify the existing station property by improving and maintaining green space, improving bus mobility on the site and improving the air flow at the station. These improvements would benefit the surrounding area and reduce the burdens of lack of green space and traffic volumes identified in the CJEST by incorporating more plantings and improving connectivity for transit service as an alternative mode.

5.3.2.2 CONSTRUCTION IMPACTS

The construction impacts are temporary and impacts to noise or air quality would be minimized through best management practices as stated in those respective sections.

6. Visual and Aesthetic Conditions

This section discusses potential changes to the surrounding visual environment that would result from Project implementation.

6.1 Methodology

MARTA assessed the visual and aesthetic impacts by identifying visual resources in the area, such as prominent features including distinct structures, park space and other natural features in the area. The assessment of effects focuses on the alterations to the viewsheds from neighboring properties and within the site.

For purposes of this analysis, a visual impact is considered adverse if it resulted in one or more of the following:

- Incompatibility with community aesthetic goals.
- Extensive changes to buildings or the surrounding area that are not compatible with the character of the area.
- A substantial change that would degrade the existing visual character or quality of a site and its surroundings.

6.2 Existing Conditions

Five Points Station opened in 1979 in the heart of downtown Atlanta and serves as the primary transfer point between the north/south and east/west rail lines. The rail lines operate at subsurface levels and the concourse and plaza levels are at street level or higher. Five Points Station changes grades from the lowest point in the southeast corner to the highest point in the northwest corner. The site consists of covered access to the rail station for pedestrians and there are bus loading facilities along Alabama and Forsyth Streets. Access to the concourse level is available from Forsyth Street and Peachtree Street. Because of the grade changes at the site, the site is contained within walls and stair access to different levels of the station. Much of the view of the site from street level is of the walls and stair features.

The primary visual component that is associated with Five Points Station is the existing canopy roof structure, a structure that is eligible for listing on the National Register of Historic Places. The street-level plaza consists of a Brutalist canopy designed by the Atlanta-based architecture firm Finch-Heery, a pedestrian mall, station entrances, and a station soccer field. The concourse level features faregates and the Reduced Fare and Lost and Found Offices. Platform levels include the east-west platform level where riders board and disembark the green and blue lines; and the north-south platform level where riders board and disembark the red and gold lines.

6.3 Environmental Impacts

6.3.1 No Build Alternative

There would be no visual impacts because the No Build Alternative would not result in changes to existing visual resources.

6.3.2 Build Alternative

6.3.2.1 PERMANENT IMPACTS

The Project would alter the visual character of the existing property by demolishing the existing canopy and constructing an alternative canopy that would adequately protect the station plaza and concourse from the elements while promoting natural air and light circulation within the station. Additionally, the new canopy design will enable the visually exposed concourse level to visible from the street level. The proposed improvements support MARTA's goals and objectives to provide a modernized and safe transit hub and public space that is easier to maintain and safer and more efficient to use. The changes alter the visual character of the site but will improve the viewshed to and from Five Points Station by creating greater visibility across the property and better integrate the station into the surrounding area and community.

6.3.2.2 CONSTRUCTION IMPACTS

Temporary visual impacts from construction would occur because of placement of construction scaffolding and equipment. Construction will occur on the existing Five Points Station site and not affect surrounding properties.

7. Historic Resources

This section provides an overview of the Five Points Station Transformation Project's effects on historic resources as proposed in the Build Alternative. More information can be found in the Determination of Eligibility and Assessment of Effects Reports and associated correspondence in Appendix D.

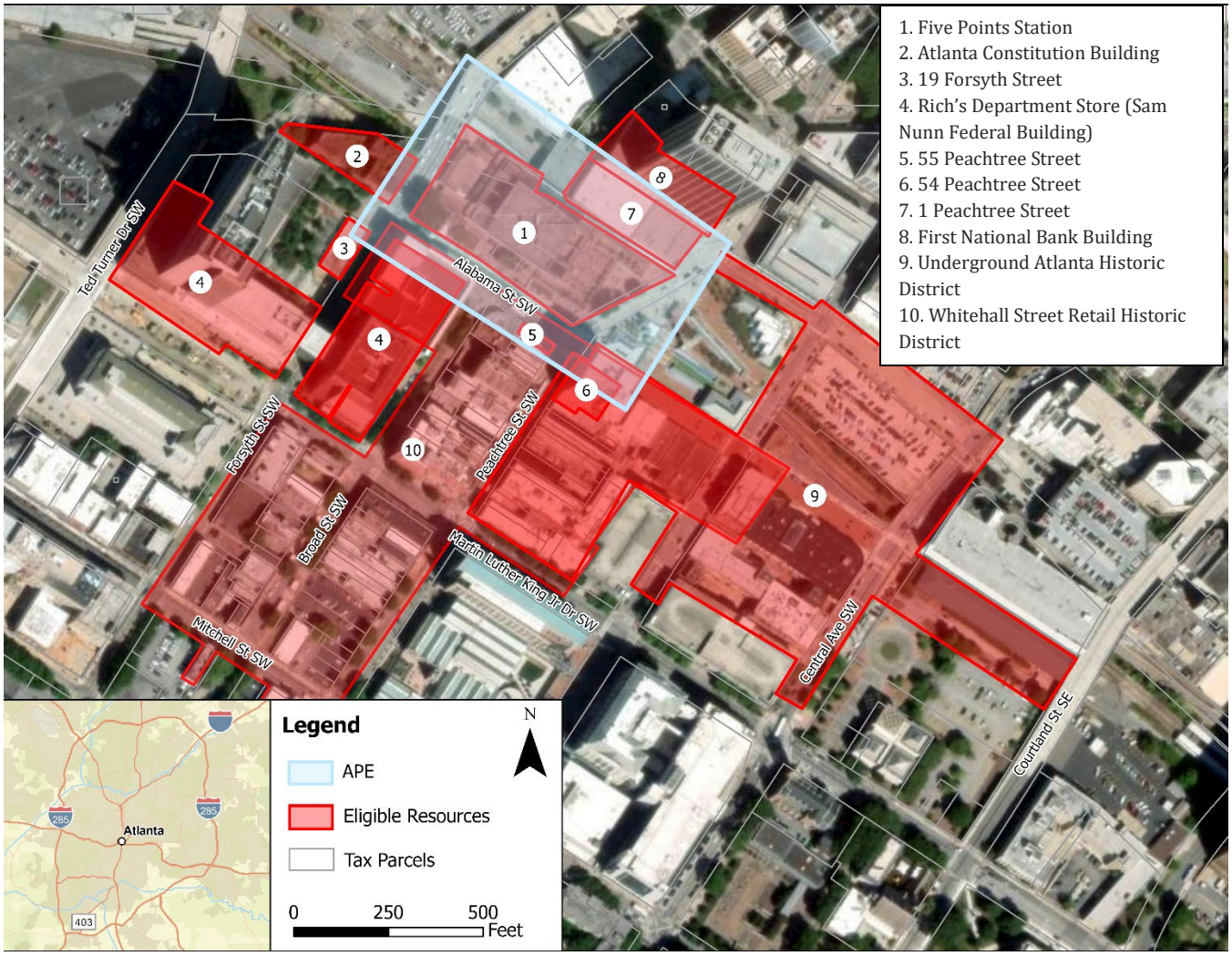
7.1 Methodology

This section complies with Section 106 of the National Historic Preservation Act (NHPA) requiring consideration of a Federally-funded project's effects on historic properties listed on or eligible for listing on the National Register of Historic Places (NRHP) within the Project's Area of Potential Effects (APE). The APE, as defined in 36 CFR § 800.16(d), is "the geographic area or areas within which an undertaking may directly or indirectly cause

alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking."

The APE consists of the area where the Project has the potential to cause effects on historic properties. FTA delineated the APE to reflect the nature, scale, and location of the Project activities subject to consultation (see **Figure 15**). The survey report and assessment of effects covers structures of historic age in the APE. For the purposes of this project, historic age is 45 years or older (1978 or earlier as of this report in 2023). The surveyed areas consisted of Five Points Station, immediately adjacent properties, and viewshed considerations.

FIGURE 15. FIVE POINTS TRANSFORMATION AREA OF POTENTIAL EFFECT



7.2 Existing Conditions

The Georgia SHPO provided a Determination of Eligibility for Five Points Station and the 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."

A survey was conducted of historic resources within the APE (see Figure 15). Four resources were determined or previously determined to be eligible for listing on the NRHP:

- Five Points Station, Resource 1, 30 Alabama Street SW
- Atlanta Constitution Building, Resource 2, 143 Alabama Street SW
- Rich's Department Store, Resource 4, 41 Broad Street SW
- First National Bank Building, Resource 8, 2 Peachtree Street SW

Two districts are listed on the NRHP:

- Underground Atlanta Historic District, Resource 9
- Whitehall Street Retail Historic District (see SHPO response to AOE in Appendix D)

7.3 ENVIRONMENTAL IMPACTS

7.3.1 No Build Alternative

There would be no change to Five Points Station and therefore no impact under the No Build Alternative.

7.3.2 Build Alternative

Impacts from the Build Alternative are based on anticipated effects to those historic resources based on the 60% canopy demolition design and 30% plaza modification (as seen in Appendix B).

Based on this information, and concurrence from SHPO a finding of No Adverse Effect was determined for the following resources:

1. Atlanta Constitution Building, Resource 2
2. First National Bank Building. Resource 8
3. Underground Atlanta Historic District, Resource 9
4. Whitehall Street Retail Historic District inclusive of Rich's Department Store, Resource 4

There will be no adverse effect on the aforementioned resources because all of the construction and ground-disturbing activity associated with the Project is anticipated to occur within existing the existing Five Points Station plaza and right-of-way, and would not require the displacement or alteration of any structures or other contributing features located within the eligible historic boundaries of these properties. While project implementation would result in the introduction of visual elements due to the demolition of the existing Five Points Station canopy, construction of the proposed replacement canopy, and plaza reconfiguration, these changes would not be considered adverse. These changes occur in an evolving urban setting that features a range of building types and styles with no consistent visual character. Further, the resources' integrity of setting has already been diminished by the construction of Five Points Station itself, which post-dates the construction dates and periods of significance for all four NRHP-listed and eligible properties. While the Project would constitute a change in the resources' viewsheds, it would not alter any identified character-defining features. Therefore, the Project would result in no adverse effect on these historic properties.

A finding of Adverse Effect was determined for the Five Points Station, which has become exceptionally significant within the last fifty years:

1. Five Points Station, Resource 1

This finding is based on project activities that would remove and alter contributing features to this exceptionally significant resource, including the demolition and replacement of the existing station canopy.

7.3.2.1 AVOIDANCE AND MINIMIZATION MEASURES

Alternatives were considered to avoid and/or minimize the adverse effect to Five Points Station. These were the no build alternative and an alternative that would repair and preserve the station's canopy.

The No Build Alternative was not considered feasible because the current station configuration precludes project components needed to improve connectivity and pedestrian access to Five Points Station and surrounding area, and therefore would not meet the need and purpose of the Project. The Project team also considered an alternative that would repair the station's canopy; however, this alternative ultimately did not meet the Project's purpose and need. Retaining the canopy does not allow for project components such as opening up the plaza, removing visual barriers, maximizing natural light and enhancing air circulation to create a more engaging, pedestrian-friendly space.

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

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

Mitigation measures are discussed in Section 14 Section 4(f) Evaluation.

8. Natural Resources

This section summarizes the natural resources, defined as plant and animal species and any areas capable of either providing habitat for plant and animal species or functioning to support ecological systems, including surface waters, wetlands, floodplains, terrestrial and aquatic resources, and ecologically sensitive areas.

8.1 Methodology

Natural resources evaluated in this chapter include surface waters, floodplains, wetlands and protected species. The following laws regulate federal and state listed threatened and endangered species:

- Endangered Species Act of 1973 (16 U.S.C. §§ 1531-1544)
- Migratory Bird Treaty Act of 1918 (16 USC §§ 703–712, as amended)

Information in this section is derived from:

- U.S. Fish and Wildlife Service IPaC Resource List for the Project Area, completed 9/15/2023

    - Database search includes species that may potentially occur within three miles of the site.
- Georgia Department of Natural Resources Georgia Natural Archaeological Historical GIS (GNAHRGIS) Ecology Review

8.2 Existing Conditions

There are no surface waters, wetlands or floodplains in the study area. One potential species was identified to potentially be on site, the tricolored bat (*Perimyotis subflavus*). The tricolored bat is listed as "proposed endangered" by the US Fish and Wildlife Service and as a "species of concern" in Georgia. Habitat in Georgia is typically in open forests with large trees and along woodland edges. The tricolored bat is not known to inhabit open buildings with heavy pedestrian traffic. While their preferred habitat in the southern US includes confined caves, abandoned mines, and abandoned tunnels, they primarily roost among leaf clusters of live or recently dead deciduous hardwood trees. Habitat for this species is not present in the study area. No species were identified during field surveys.

The Migratory Bird Treaty Act (MBTA) requires the protection of migratory birds and their habitats. There was no evidence of nesting migratory birds on site.

8.3 Environmental Impacts

No suitable habitat is present on the site, and therefore the Project would have no effect on the tricolored bat.

8.3.1 No Build Alternative

The No Build Alternative would not result in adverse impacts to natural resources.

8.3.2 Build Alternative

The Project would not change the site conditions for water resources or protected species and therefore there are no adverse impacts to natural resources. Although nests and roosting were not observed in field visits, if evidence of migratory bird nests or bats are found during construction, a stop work order will be issued until the nests or bats can be relocated in accordance with state and federal laws.

9. Noise and Vibration

This section discusses the noise analysis that was conducted and the potential effects of the Project. A detailed report noise analysis is in Appendix E.

9.1 Methodology

An ambient noise monitoring survey and assessment was completed for the Project. The proposed improvements will not change daily transit service operations and therefore future noise exposure at adjacent noise sensitive properties is expected to remain unchanged from noise levels experienced today. Consequently, a future noise exposure assessment using the 2018 FTA *Transit Noise and Vibration Assessment Manual* is not necessary.

Instead, measured ambient noise conditions within the study area are compared and characterized by their relative loudness and/or annoyance within a typical urban environmental setting.

The Project improvements will not result in an increase in MARTA service line operations only a description of the FTA land use activity categories and the type of noise descriptor required for measurement and assessment for each category is shown in **Table 4**. Representative noise monitoring sites were selected based on a review of sensitive land uses within the study area. The FTA land use categories are defined as follows:

> **FTA Category 1**: Tracts of land where quiet is an essential element in their intended purpose. This category includes lands set aside for serenity and quiet, and such land uses as recording studios, concert halls and national historic landmarks would be included in this category. For this land use category the nosiest hour (peak) L_{eq}(h) dB(A).
>
> **FTA Category 2**: Residences and buildings where people normally sleep. This category includes residences, hospitals, motels and hotels, where sensitivity to nighttime noise is assumed to be of utmost importance and therefore the day-night Ldn noise descriptor is used to establish impact.
>
> **FTA Category 3**: Institutional land uses with primarily daytime and evening use and thus the noisiest hour (peak) L_{eq}(h) metric is used to determine potential impact. This category includes schools, libraries, theaters, and churches as well as other uses listed in **Table 4** below.

TABLE 4. FTA LAND USE CATEGORIES AND METRICS FOR TRANSIT NOISE IMPACT CRITERIA

Land Use Category	Noise Metric (dB(A))	Description of Land Use Category
1	Outdoor L_{eq} (h)*	Tract of land where quiet is an essential element in their intended purpose. This category includes lands set aside for serenity and quiet, and such land uses as outdoor amphitheaters and concert pavilions, as well as National Historic Landmarks with significant outdoor use. Also included are recording studios and concert halls.
2	Outdoor L_{dn}	Residences and buildings where people normally sleep. This category includes homes, hospitals and hotels where a nighttime sensitivity to noise is assumed to be of utmost importance.
3	Outdoor L_{eq} (h)*	Institutional land uses with primarily daytime and evening use. This category includes schools, libraries and churches where it is important to avoid interference with such activities as speech, meditation and concentration on reading material. Places for meditation or study associated with cemeteries, monuments, museums campgrounds and recreational facilities can also be in this category. Certain historical sites and parks are also included.

Source: Federal Transit Administration: Transit Noise and Vibration Impact Assessment. U.S. Department of Transportation Report Number FTA-VA-90-1003-06, September 2018.

Notes: * L_{eq} for the noisiest hour of transit related activity during hours of noise sensitivity

The following noise metrics, weighted to the dB(A) scale, were developed and adapted by government agencies for the assessment of impact and annoyance:

- L_{eq} is called the "equivalent noise level" and it is a single value metric derived from the sum of the cumulative noise exposure from all events normalized to a specific period of time, typically a one hour period, denoted as L_{eq} (1-hr). The L_{eq} is the noise descriptor most commonly used in noise impact assessment criteria and is used for both traffic and transit impact assessment.

- The 24-hour Day/Night Noise Level or "L_{dn}" is a computed value representing the time averaged noise exposure for a single full 24-hour period. Because of the greater sensitivity of people to annoyance during sleeping hours, the L_{dn} metric, when computed, includes a ten decibel added adjustment to noise levels for the 9 hour nighttime period, defined from the hours of 10:00 p.m. to 7:00 a.m. The details of how the L_{dn} calculation is computed are described in the appendix of the FTA Manual. The FTA considers the L_{dn} metric as the preferred descriptor when assessing transit noise exposure in residential communities or other land uses involving places where people sleep.

9.2 Existing Conditions

A review of the land uses within the Project study area was completed and four representative noise sensitive sites were identified and selected for noise monitoring. The study area consisted of a combination of Category 2 and 3 land uses. Noise measurement Sites #1 and #2 are illustrated in **Figure 16** and Sites #3 and #4 are depicted in **Figure 17**. Measurement Sites #1 and #3, are FTA Category 2 land uses because they involve places where people currently sleep or will sleep based of future development and have sensitivity to nighttime noise, thus require estimation of the day-night noise descriptor. The existing noise level is computed based on the averaging the various daytime and nighttime noise measurements using the methodology described in the FTA Manual Appendix E. Conversely, measurement Sites #2 and #4, are Category 3 daytime limited land uses and thus utilize the peak hour noise reading extracted directly from the measurement data.

FIGURE 16. NOISE MEASUREMENT SITES 1 AND 2

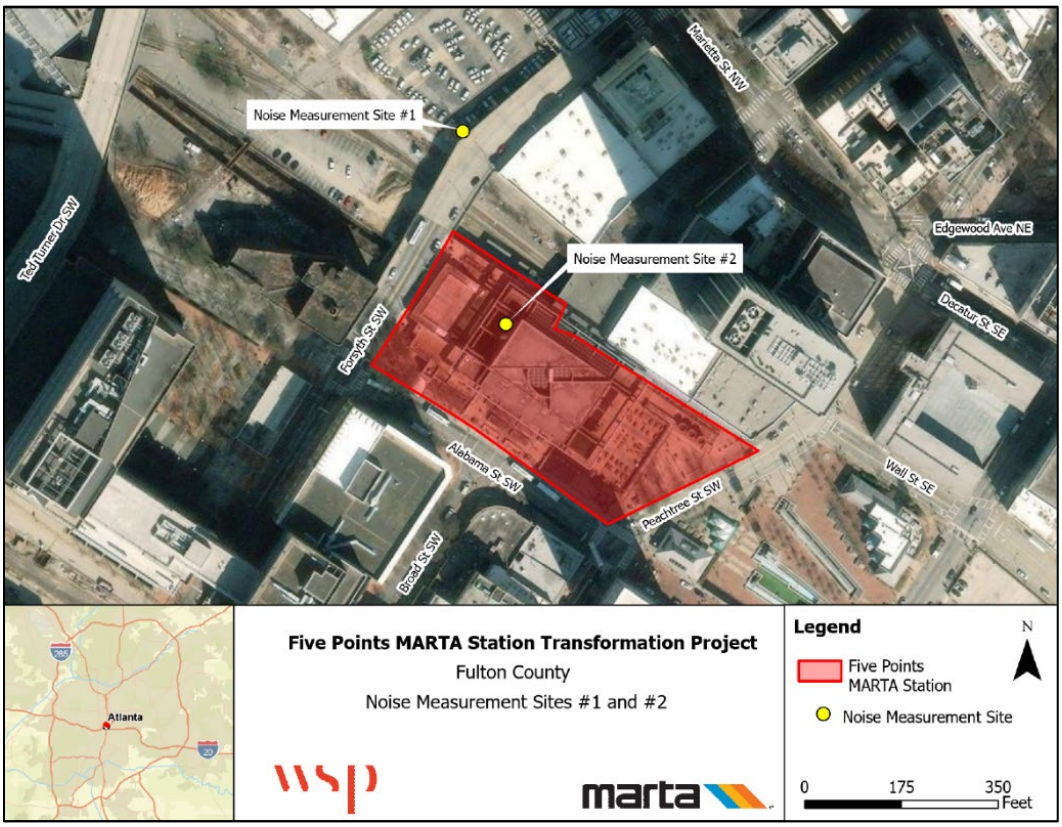
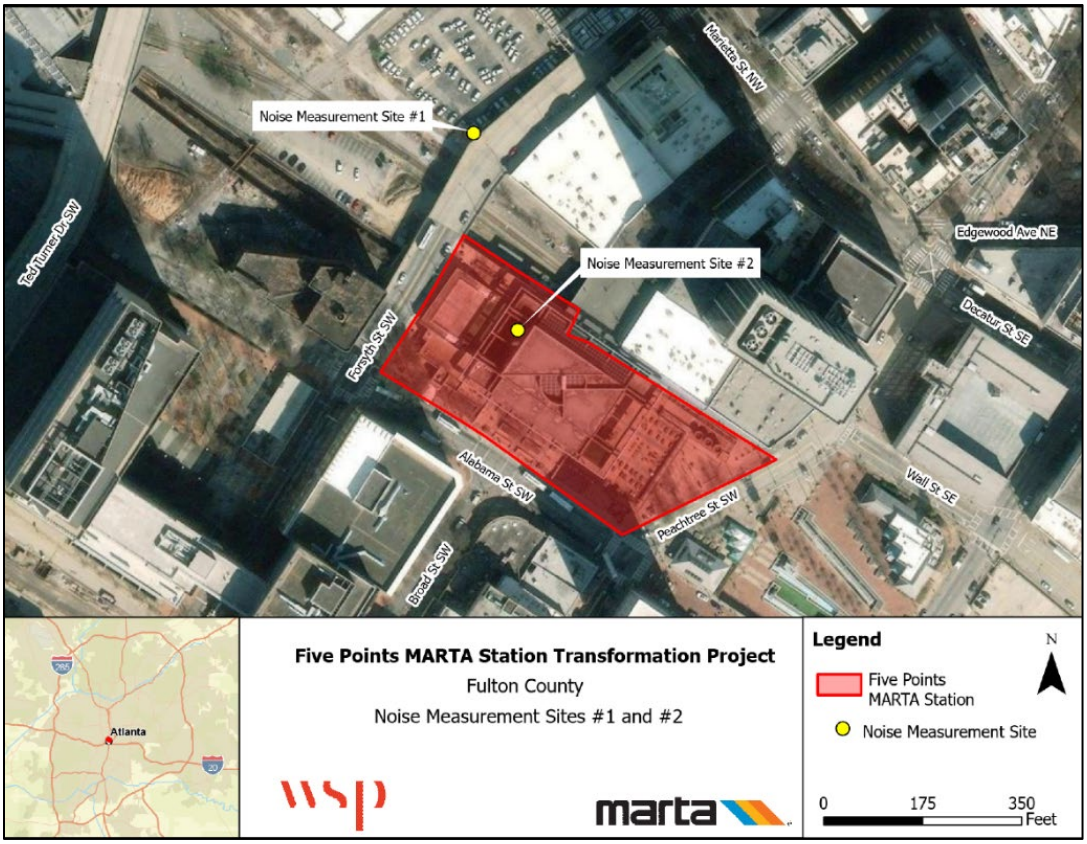


FIGURE 17. NOISE MEASUREMENT SITES 3 AND 4



Noise measurements were recorded on May 4th, 2023, during favorable weather conditions, using a laboratory calibrated sound-level meter attached to a calibrated condenser microphone covered with a windscreen mounted on a tripod at a height of approximately 5.5 feet above the ground. FTA Category 2 sites included daytime and late night noise measurements and Category 3 land uses were collected only for the daytime hours. A summary of the measured noise levels are presented in **Table 5**. Peak AM time period noise levels were consistently lower than the peak PM levels at all monitoring locations and therefore the peak AM values are not included in **Table 5**. Measured noise levels consisted of a combination of human induced noise, such as people shouting, playing music and a combination of vehicle traffic and transit movements.

Measured and estimated noise levels collected at the Category 2 sites #1 and #3, are best described as consistent very noisy ambient noise exposure conditions of 70 dB(A) or higher.

On the other hand, noise monitoring at sites #2 and #4, which are active recreational FTA Category 3 land uses, yielded peak noise (1-hr) levels of less than 65 dB(A) which is consistent with a quieter daytime exposure environment. Sites #2 and #4 are somewhat shielded and isolated from traffic movements and no active recreation was reported taking place on the soccer field during the noise measurement survey; resulting in the lower reported measured noise exposure conditions.

TABLE 5. SUMMARY OF MEASURED NOISE LEVELS

Receptors	Land Use Description	FTA Land Use	Measured Noise Levels (dB(A)) *			
			Midday (Leq)	Peak PM (Leq)	Late Night (Leq)	Ldn
R1	Future Centennial Yard Development	Cat 2 & 3	68	72	66	71
R2	Five Point Station Soccer Field	Cat 3	63	61	NA	NA
R3	Fairfield Inn & Suites	Cat 2	67	67	65	70
R4	Underground Atlanta Park	Cat 3	62	60	NA	NA

Notes: * Measured noise levels were collected on May 4, 2023

9.3 Environmental Impacts

9.3.1 No Build Alternative

There would be no change to noise levels under the No Build Alternative.

9.3.2 Build Alternative

9.3.2.1 PERMANENT IMPACTS

Transit operations are expected to remain unchanged and therefore is not expected to further exacerbate the current ambient noise environment within and surrounding this community and would have no effect.

9.3.2.2 CONSTRUCTION IMPACTS

The Project is subject to the City of Atlanta Noise Ordinance, which limits construction activities to weekdays from 7 AM to 8 PM. Furthermore, the ordinance sets a minimum 100-foot distance between the property where the noise emanates to the nearest residential property. In addition to these requirements, since the Project involves transit infrastructure improvements, the FTA Construction Noise Criteria, shown in **Table 6**, applies. The FTA noise criteria sets a maximum 8-hour average daytime noise exposure up to 80 dB(A) near residential properties and 85 dB(A) near commercial businesses. FTA defines the 8-hour daytime period as any 8 hours where construction activities will occur between 7 AM to 7 PM and similarly at night as any 8 working hours between 7 PM to 7 AM. However, because the Atlanta Noise Ordinance does not allow for construction after 8 PM, unless in the case of an emergency such as work to restore water or power to the public or other emergencies implicating public safety, the nighttime impact threshold limits are not applicable for the Project.

TABLE 6. FTA CONSTRUCTION NOISE CRITERIA

Land Use	Eight-Hour Leq (dB(A))	
	Day	Night
Residential	68	72
Commercial	63	61
Industrial	67	67

Source: Transit Noise and Vibration Impact Assessment, FTA, 2018

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

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

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

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

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

10. Hazardous Materials

This section discusses the potential for hazardous materials and the potential for disruption of these materials during construction and implementation.

10.1 Methodology

Federal regulations for monitoring hazardous materials include the Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Clean Air Act (CAA) and the Toxic Substances Control Act (TSCA). A preliminary screening was conducted for the station site using the EPA EnviroMapper.

10.2 Existing Conditions

There are no hazardous materials sites identified on Five Points Station property in the EnviroMapper records. There are cleaning supplies stored on site and are stored in flammable containment cabinets or other designated storage per standard operating procedures (SOPs). Oil and grease for facilities maintenance are also stored on site in less than 50-gallon containers and stored in flammable containment cabinets or other designated storage areas as warranted per SOPs.

10.3 Environmental Impacts

10.3.1 No Build Alternative

The No Build Alternative would not disrupt or encounter hazardous materials because the Project would not be constructed.

10.3.2 Build Alternative

The Build Alternative is a modernization of the plaza level and canopy and would not include storage of hazardous materials or generate any hazardous materials. Construction activities would not likely disturb or uncover hazardous materials because it is not disrupting soil or groundwater. Construction related hazardous or regulated materials may be temporarily stored on site and will be stored in accordance with the applicable regulations.

11. Safety and Security

This section discusses the safety and security considerations for the Project. Safety includes incidents that may occur at Five Points Station property and security refers to the monitoring and prevention of harm from intentional acts or circumstances.

11.1 Methodology

MARTA is required to meet safety and security standards and regulations in the FTA's Public Transportation Agency Safety Plan (49 CFR Part 673) and National Public Transportation Plan. Potential for impacts will be assessed to determine if the Project can adequately provide safe and secure operation, would alter conditions that lead to accidents, and would improve overall safety and security compared to the existing conditions.

11.2 Existing Conditions

MARTA's Agency Safety Plan was adopted in August 2022 and provides agency specific policies and procedures including safety management, performance targets, risk management, safety assurance and safety promotion. The Federal Transit Administration (FTA) requires that the Authority certify that all practical steps have been taken before modifications are placed into service to optimize the operational safety of the Project. The verification process will be conducted by the MARTA Office of Safety and executed by the Contractor in accordance with MARTA Agency Safety Plan (ASP), MARTA System Safety Program Plan (SSPP), MARTA Safety and Security Certification Program Plan (SSCPP), MARTA Hazard Management Plan, MIL-STD-882E, and the pending approval of the MARTA Public Transportation Agency Safety Plan. A project specific Site SSCP shall be prepared to guide the contractors through the construction phase and closeout of the project.

11.3 Environmental Impacts

11.3.1 No Build Alternative

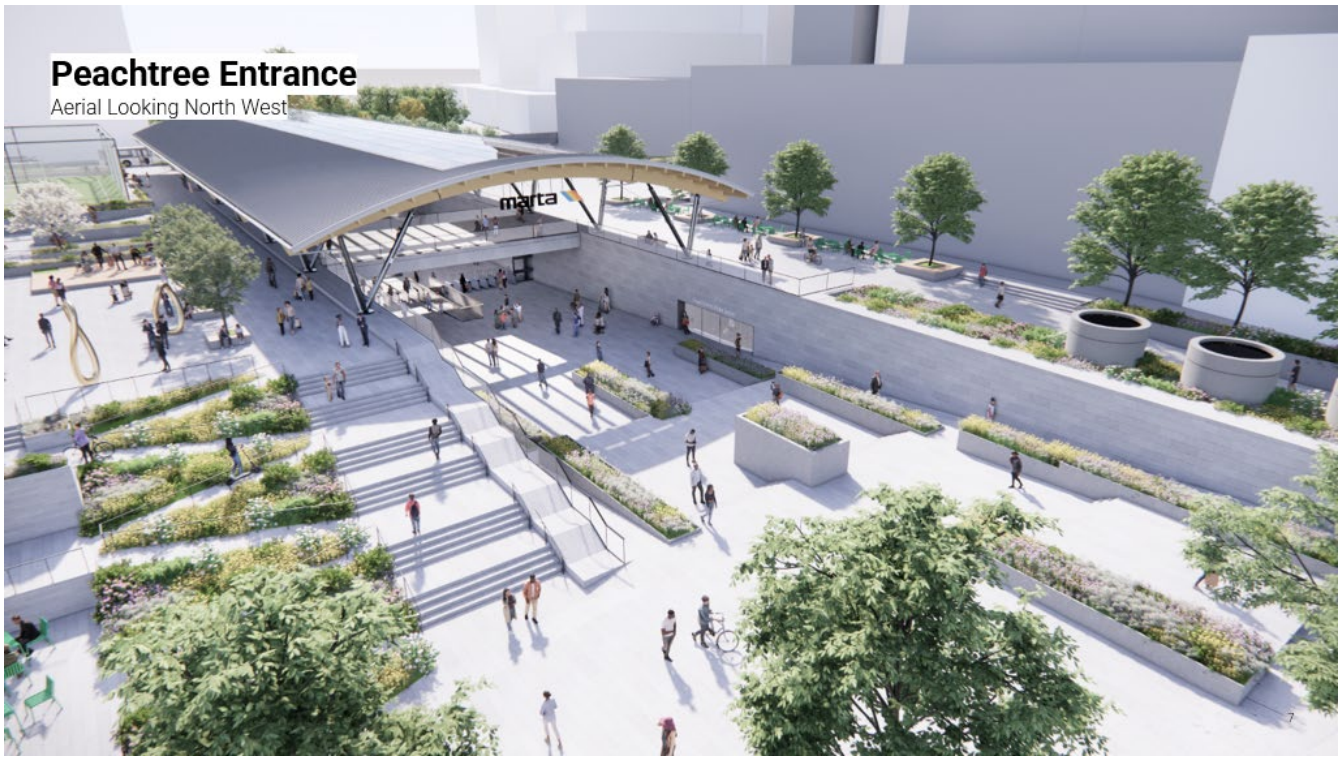
Under the No Build Alternative, safety improvements that improve visibility, access and bus connectivity would not be constructed and therefore, there would be no change to the existing safety conditions.

11.3.2 Build Alternative

11.3.2.1 PERMANENT IMPACTS

The Build Alternative would enhance safety by improving visibility, modifying site access, improving bus loading areas, and improving pedestrian access to the station. The visibility would be improved by modifying the plaza level to have more visibility to the concourse level and eliminating the tunnel effect, and a better viewshed across the site by changing the canopy structure (see **Figure 18**). The site access will be reconfigured with more mobility options across the site and easier to navigate ramps between the plaza and concourse levels. The bus loading areas will be easier to navigate because of the installation of the sawtooth bus bays, and pedestrian access will be improved with crosswalk improvements to the station area.

FIGURE 18. RENDERING OF FIVE POINTS TRANSFORMATION CONCEPT



11.3.2.2 CONSTRUCTION IMPACTS

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

12. Utilities

This section identifies potential impacts of the Project on existing public utilities.

12.1 Methodology

MARTA has reviewed publicly available municipal utility information and as-built drawings of Five Points Station to identify the presence of public utilities with and adjacent to the Project area.

12.2 Existing Conditions

No public utilities pass through parcels on which Five Points Station is located. The Project Area is contained primarily within these parcels owned by MARTA, but elements of the Project encroach upon adjacent rights-of-way where public utilities such as storm and sanitary sewers, and water lines are located. These encroachments involve the installation of new stormwater lines connecting to existing stormwater catch basins and junction boxes within the right-of-way, and water service connections for new fire hydrant locations.

12.3 Environmental Impacts

12.3.1 No Build Alternative

There will be no changes to utilities as a result of the No Build Alternative.

12.3.2 Build Alternative

No permanent environmental impacts to public utilities are anticipated as a result of the Project work. During construction utilities will be modified to accommodate the new plaza and canopy configuration with the following effects:

Stormwater Utilities: The Project will disconnect several below grade stormwater connections between Five Points Station structure and catch basins located within the rights-of-way. New storm sewer segments, curb inlets, and junction structures will be installed within the rights-of-way of Forsyth Street, Alabama Street, and Peachtree Street to receive stormwater collected from the new station roof structure and new plaza level trench drains, and to better convey stormwater flow to the existing stormwater network downstream.

Water mains: The Project will install new fire hydrants behind the curb line around the perimeter of Five Points Station. These will connect to existing water mains within the rights-of-way with lateral connections.

13. Indirect and Cumulative Impacts

Indirect effects are defined by the Council on Environmental Quality as follows:

"Indirect effects," which are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.

Effects and impacts, as used in these regulations, are synonymous (40 CFR § 1508.8) (1978).

Cumulative impacts are defined as follows:

"Cumulative effects" is the effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from result from adding the effects of one action to the effects of other actions (40 CFR §1508.1(g)(3)) (1978).

Additional guidance for this analysis comes from Considering Cumulative Effects under the National Environmental Policy Act (CEQ, 1997), Guidance on the Consideration of Past Actions in Cumulative Effects Analysis (CEQ, 1995), and National Cooperative Highway Research Project Report 466, Desk Reference for Estimating the Indirect Effects of Transportation Projects (TRB, 2002).

The Projects that are present and reasonably foreseeable future projects adjacent or near the Project site are identified in **Table 7**, and includes both public and private projects. An assessment of indirect and cumulative effects was conducted relative to each of the resource areas in this EA.

TABLE 7. PRESENT AND REASONABLY FORESEEABLE FUTURE PROJECTS

Project	Sponsor	Description	Timing	Potential Impacts
Peachtree Street – South Downtown Safety Enhancements	City of Atlanta	Pedestrian safety enhancements from Alabama Street to Trinity Avenue	2025	Construction, traffic
Peachtree Street – Complete street and pedestrian safety improvements	City of Atlanta/Atlanta Downtown Improvement District	Road diet, pedestrian safety upgrades and landscape improvements	2027	Construction, traffic
Central Avenue Bridge Replacement	City of Atlanta	Bridge replacement at Central Avenue between Decatur Street to Martin Luther King Jr Drive	2025	Construction, traffic
Summerhill Bus Rapid Transit	MARTA	BRT in dedicated lanes connecting downtown Atlanta to the Summerhill community.	2024	Construction, traffic, transit

Project	Sponsor	Description	Timing	Potential Impacts
Forsyth Street Enhancements	City of Atlanta/Atlanta Downtown Improvement District	Possible lane reconfigurations along Forsyth Street to improve the corridor for all users	TBD	Construction, traffic
Centennial Yards	CIM Group	Mixed use development of a 50-acre site at "the Gulch" to include the vertical development of eight million square feet of residential, entertainment, retail, office, and other commercial space.	TBD	Construction, traffic, land use, visual resources, utilities, economics
Two Peachtree	Invest Atlanta	Redevelopment of office building into residential/mixed use	TBD	Construction, traffic, land use, utilities, economics
Underground Atlanta	Lelani Ventures	Revitalization and redevelopment of Underground Atlanta retail areas.	TBD	Traffic, land use, economics

13.1 Environmental Impacts

Indirect and cumulative effects of the present and reasonably foreseeable projects are summarized in **Table 8** below.

TABLE 8. INDIRECT AND CUMULATIVE EFFECTS SUMMARY BY RESOURCE AREA

Resource Area	Indirect Effects	Cumulative Effects
Transportation	No expected changes	Localized increase in traffic and parking, which would be accommodated by private developments.
Land Use and Zoning	Ongoing infill development in and around the site on vacant parcels and underutilized parcels that increase density	Positive impacts on development and increased density which supports improvements to the station and better access to the area
Air Quality	None expected	None expected
Hydrology and Water Quality	None expected	None expected
Socioeconomic and Demographic Conditions	Induced growth in population and employment as a result of revitalization and new developments.	Positive impact on bringing more residents, workers and visitors to downtown.
Environmental Justice	Induced growth may have a beneficial effect with the inclusion of affordable housing in Two Peachtree and other developments.	Positive impact by creating more economic opportunity, jobs and access to these opportunities.
Neighborhood and Community Resources	Induced growth is consistent with local plans for revitalization and economic growth	Positive impact on residential development and community resources.

Resource Area	Indirect Effects	Cumulative Effects
	building cohesion between Five Points Station and the surrounding area.	
Visual and Aesthetic Conditions	Infill developments and other transportation projects could change the visual quality, generally for the better by make the area easier to navigate for pedestrians.	Anticipate large scale developments including new residential and retail buildings could change the visual character but would be consistent with the Project
Historic and Archaeological Resources	None expected	None expected
Natural Resources	None expected	None expected
Noise and Vibration	Temporary impacts during construction	Temporary impacts during construction, and possibly from changes to traffic
Hazardous Materials	None expected	None expected
Safety and Security	None expected	Positive impact from increased presence of police and increase in activity in and around the area with an influx of people
Utilities	None expected	Increase in demands on utilities to support new developments and conversion of existing office building to residential
Public Health and Hazards	None expected	None expected
Recreation	None expected	None expected
Construction Impacts	Temporary increase in dust and noise	Temporary increase in dust and noise

14. Section 4(f) Evaluation

14.1 REGULATORY CONTEXT

In general, Section 4(f) of the USDOT Act of 1966, as amended (23 CFR Part § 774, codified in 49 U.S.C. 303 and generally referred to as "Section 4(f)") prohibits the Secretary of Transportation from approving any program or project that requires the "use" of the following:

- Any publicly owned parkland, recreation area, or wildlife and waterfowl refuge of national, state, or local significance; or
- Any land from a public or privately-owned historic site of national, state, or local significance (collectively, "Section 4(f) properties"), unless there is no feasible and prudent alternative to the use of such land and such program or project includes all possible planning to minimize harm to the Section 4(f) properties.

A historic site is a property that is listed on, or eligible for listing on, the National Register of Historic Places (NRHP). As set forth in the Section 4(f) regulations, archaeological resources are protected under Section 4(f) only when their importance is derived from their preservation in place.

Aside from limited exceptions, Section 4(f) specifies that FTA may only approve a transportation project that requires the use of land from applicable properties as described above if:

- There is no prudent and feasible alternative to the use of that land and all possible planning to minimize harm due to the use has been included as part of the Project, or
- The Administration determines that the use of the property, including any measure(s) to minimize harm, will have a de minimis impact on the property, as defined in 23 CFR § 774.17. This project does not have a de minimis impact on the property.

14.2Types of Section 4(f) Use

Any properties within the study area protected by Section 4(f) were evaluated to determine if there would be a use of the property, as defined in 23 CFR § 774.17. There are three types of Section 4(f) uses:

- Permanent incorporation.
    - A permanent incorporation occurs when land from a Section 4(f) resource is either purchased outright as transportation right-of-way or when the applicant for federal-aid funds has acquired a property interest that allows permanent access onto the property, such as a permanent easement for maintenance or other transportation-related purposes.
- Temporary occupancy.
    - A temporary occupancy occurs when a Section 4(f) resource, in whole or in part, is required for project construction-related activities. The property is not permanently incorporated into a transportation facility, but the activity is considered to be adverse in terms of the preservation purpose of Section 4(f).
    - Under 23 CFR § 774.13, a temporary occupancy of a resource does not constitute a "use" of a Section 4(f) resource when all of the following conditions are satisfied:
        - The duration of use would be temporary (i.e., less than the time needed for construction of the Project), and there would be no change in ownership of land.
        - The scope of work would be minor (i.e., both the nature and magnitude of the changes to the Section 4(f) resource would be minimal).
        - There would be no anticipated permanent adverse physical impacts, nor would there be interference with the protected activities, features or attributes of the resource, on either a temporary or permanent basis.
        - The land being used would be fully restored to a condition that is at least as good as that which existed before the Project.
        - There is documented agreement among appropriate federal, state and local official(s) with jurisdiction over the Section 4(f) resource regarding the above conditions.
- Constructive use.
    - A constructive use of a Section 4(f) resource occurs when there is no actual physical use of the Section 4(f) property via permanent incorporation of land or a temporary occupancy, but the

proximity of the Project results in impacts (e.g., noise, vibration, visual impacts or property access) that substantially impair the activities, features or attributes that qualify a resource for Section 4(f) protection. Factors for assessing substantial diminishment are provided in 23 CFR § 774.15.

14.3 Section 4(f) Applicability and Methodology

In general, an individual Section 4(f) evaluation must be completed when approving a project that requires the use of Section 4(f) property if the use results in a greater than de minimis impact and a programmatic Section 4(f) evaluation cannot be applied to the situation (23 CFR § 774.3). This project requires an individual Section 4(f) evaluation. The individual Section 4(f) evaluation documents the evaluation of the proposed use of Section 4(f) properties in the Project area of all alternatives. The individual Section 4(f) evaluation requires two findings:

- That there is no feasible and prudent alternative that completely avoids the use of Section 4(f) property; and
- That the Project includes all possible planning to minimize harm to the Section 4(f) property resulting from the transportation use (23 CFR § 774.3(a)(1) and (2)).

14.3.1 Feasibility and Prudent Avoidance Alternative and Least Overall Harm

A feasible and prudent avoidance alternative would avoid using Section 4(f) property and does not cause other severe problems of a magnitude that substantially outweighs the importance of protecting the Section 4(f) property. An alternative is not feasible if it cannot be built as a matter of sound engineering judgment. An alternative is not prudent if:

1. It compromises the Project to a degree that it is unreasonable to proceed with the Project in light of its stated purpose and need.
2. It results in unacceptable safety or operational problems.
3. After reasonable mitigation, it still causes severe social, economic, or environmental impacts; severe disruption to established communities; severe disproportionate impacts to minority or low-income populations; or severe impacts to environmental resources protected under other Federal statutes.
4. It results in additional construction, maintenance, or operational costs of an extraordinary magnitude.
5. It causes other unique problems or unusual factors.
6. It involves multiple factors of the above, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.

If there is no feasible and prudent avoidance alternative, FTA may approve only the alternative that causes the least overall harm in light of Section 4(f)'s preservation purpose. In accordance with 23 CFR Part 774.3 (c)(1), "least overall harm" is determined by balancing the following list of factors:

1. The ability to mitigate adverse impacts to each Section 4(f) property (including any measures that result in benefits to the property).
2. The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection.

3. The relative significance of each Section 4(f) property.
4. The views of the official(s) with jurisdiction over each Section 4(f) property.
5. The degree to which each alternative meets the purpose and need for the Project.
6. After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f).
7. Substantial differences in costs among the alternatives.

14.4 USE OF SECTION 4(F) PROPERTIES

As stated in the regulatory context section, Section 4(f) evaluates the "use" of publicly owned parkland, recreation area, or wildlife and waterfowl refuges of national, state, or local significance, or a public or privately-owned historic site of national, state or local significance. There are no known parks, recreation areas, or wildlife or waterfowl refuge areas in the study area (immediately adjacent properties) that are considered Section 4(f) properties. The following section discusses the historic and exceptionally significant resources within the study area.

14.4.1 Historic Sites

Section 4(f) historic sites include public or privately-owned historic properties that are listed on, or eligible for listing on, the National Register of Historic Places. As identified through cultural resources surveys, there are five historic properties that are listed on or eligible for listing on the National Register of Historic Places within the study area (see **Table 9** and **Figure 19**). The Section 4(f) official with jurisdiction for all of these historic sites is the Georgia State Historic Preservation Office (SHPO). **Table 9** lists the historic resources within the study area, describes the potential effects from the Project for each property, and notes whether the Project would result in the use of each Section 4(f) property.

TABLE 9. NRHP ELIGIBLE AND LISTED RESOURCES WITHIN THE PROJECT AREA

Name	Address	National Register of Historic Places Status	Section 4(f) Use
Atlanta Constitution Building	143 Alabama Street SW	Eligible	No Use
First National Bank Building	2 Peachtree Street SW	Eligible	No Use
Five Points Station	30 Alabama Street SW	Eligible	Permanent Use
Rich's Department Store	41 Broad Street NW	Eligible	No Use
Underground Atlanta Historic District	50 Upper Alabama St	Listed	No Use

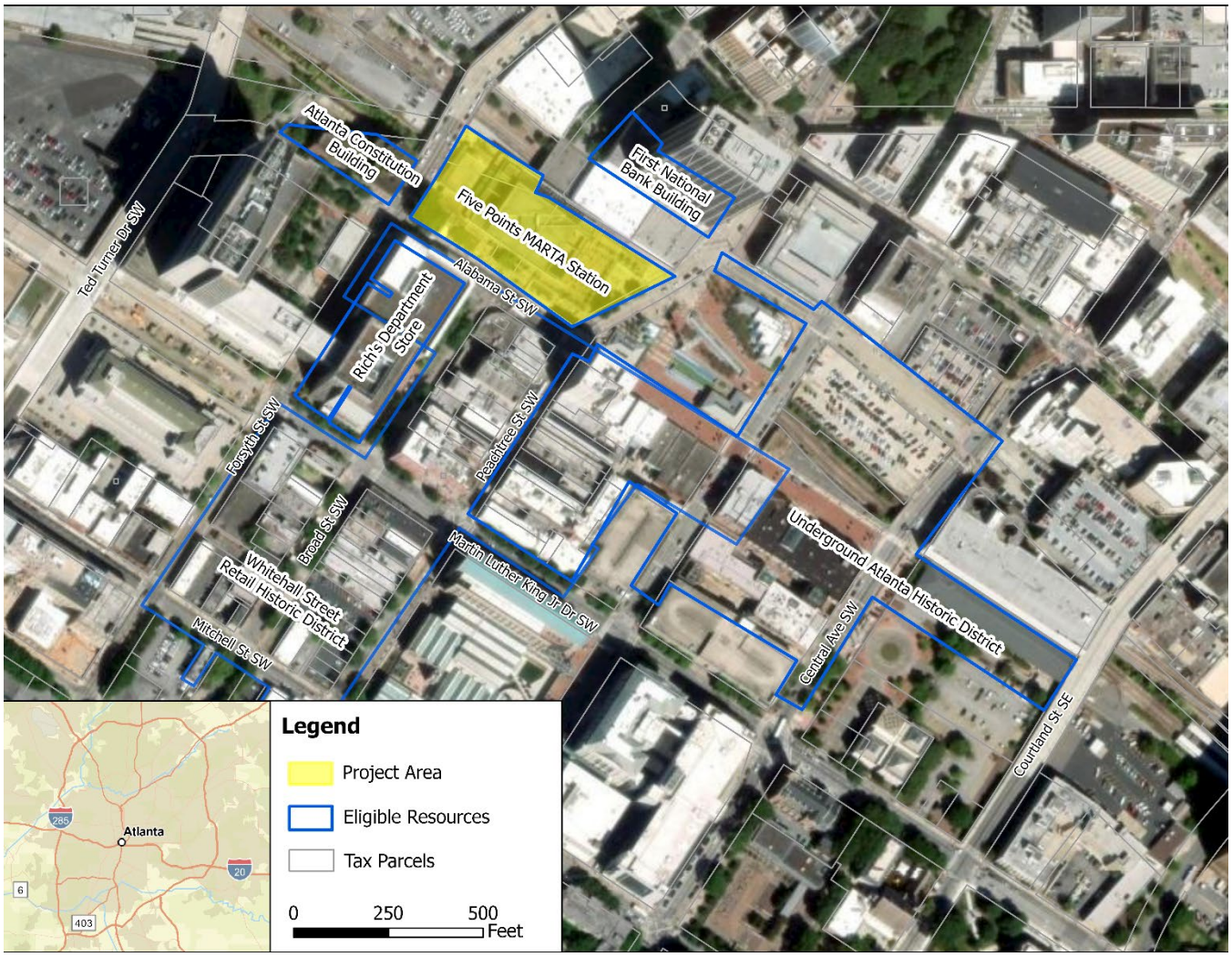
See **Figure 19** or the locations of all historic sites evaluated for Section 4(f) use. On April 27, 2023, the Georgia SHPO provided a Determination of Eligibility for Five Points Station that the station "meets NRHP Criterion Consideration G for exceptional significance under NRHP Criteria A and C in the areas of Architecture,

Community Planning and Development, Engineering, and Transportation with a local and state level of significance."

FTA submitted the Section 106 Assessment of Effects for the Project to Georgia SHPO on September 1, 2023 (included in Appendix B). This report concluded that the Project would result in a finding of Adverse Effect to Five Points Station and a finding of No Adverse Effect to the four other National Register-eligible resources identified within the Project's area of potential effect. In correspondence dated October 4, 2023, the Georgia SHPO agreed with the findings of the Section 106 Assessment of Effects report.

As part of the Project, the station's Brutalist canopy roof structure would be demolished to accommodate a new plaza and canopy, which is needed to increase natural light and air circulation, enhance site access and safety and modernize the facility at Five Points Station, all of which seek to enhance the customer experience at the station. In a letter dated October 4, 2023, SHPO stated that the proposed demolition of the existing canopy would have an Adverse Effect on the station. The canopy demolition also results in a permanent use of the property under Section 4(f).

FIGURE 19. RESOURCE LOCATION MAP



14.4.2 Feasible and Prudent Avoidance Alternatives

MARTA evaluated alternatives to avoid demolition of Five Points Station's canopy. Two alternatives, including the No Build Alternative, were developed and are discussed below. They were analyzed per the definition of feasible and prudent found in 23 CFR 774.17.

14.4.2.1 NO BUILD ALTERNATIVE

The No Build Alternative would result in no action by MARTA to construct any project which would improve connectivity and pedestrian access to Five Points Station and MARTA transit. This alternative would keep the existing facility in its current state with no improvements to its design or operations. Since the No Build alternative would not cause destruction to any portions of Five Points Station, the No Build Alternative would completely avoid the use of the Section 4(f) resource.

The No Build Alternative is considered feasible from an engineering perspective because no construction would be required to implement the alternative.

When considering the prudence of the No Build Alternative, the most relevant criterion from 23 CFR § 774.17 is, "it compromises the Project to a degree that it is unreasonable to proceed with the Project in light of its stated purpose and need." The No Build Alternative would not improve the customer experience because it does not address ongoing roof leaks and other maintenance issues or enhance site access, wayfinding and the overall functionality of the station. It also would not address current safety concerns by improving sightlines and access through the removal of large columns and grade changes, nor would it achieve the purpose and need of making Five Points Station more modern and user-friendly by increasing natural light and air circulation at the concourse and plaza levels and thus improving the overall transit passenger user experience. Because the No Build Alternative would not meet the Project's purpose and need, it is not considered a prudent alternative to avoid the use of the Section 4(f) resource.

14.4.2.2 REPAIR EXISTING CANOPY AND PLAZA

Under this alternative, the canopy roof structure and plaza configuration would be retained with necessary repairs to address leaking conditions and maintenance issues. However, this alternative ultimately did not meet the Project's purpose and need.

Retaining the existing canopy by repairing it in kind will not address the inherent flaws in its flat roof design, which exacerbates maintenance and repair. The original design causes faster degradation of leak protection due to rainfall events that lead to water retention and, ultimately leaking from the roof onto the plaza level below. The large sections of flat roof do not allow for efficient runoff. The deep troughs between the double beams are a key factor leading to pooling and water retention. Thus, without a redesign and replacement, the condition will continue even if the roof is repaired. The existing trench drain around the plaza opening as well as other drainage structures and piping around the plaza have become deficient in conveying stormwater from the site. The installation of a new drainage system for the plaza level would require demolition of the plaza and new trench installations that would serve as a retrofit only would not constitute an effective long-term solution to stormwater management.

Additionally, repairing the existing roof structure as designed while maintaining the plaza configuration would not meet the other components included in the purpose and need of the Project. Repair of the canopy in kind would mean that the canopy would continue to inhibit natural light at the plaza and concourse level; at the plaza

level portions of the skylight are obstructed by the roof, and the existing plaza extends over the concourse level, limiting both natural light and air circulation. The replacement of the canopy to open up the plaza and concourse levels to increase natural light and air is not a mere aesthetic change, but rather is essential to the Project. Repair of the current canopy would not allow for improved safety and site access because the existing large supporting pillars would need to be reinforced and retained, eliminating the ability to remove these visual barriers. The removal of these barriers is necessary to improve the passenger experience and to create a more engaging and active public space. The existing plaza configuration also features grade changes that further limit site access, navigation, and visibility for customers and MARTA staff.

When considering the prudence of repairing the existing canopy and plaza configuration to eliminate leaks and extend its useful life, the most relevant criteria from 23 CFR § 774.17 to this analysis are, "it compromises the Project to a degree that it is unreasonable to proceed with the Project in light of its stated purpose and need," "it results in unacceptable safety or operational problems," and "it causes other unique problems or unusual factors." Here, as noted, this alternative is not consistent with the Project's purpose and need because it would not increase natural light to penetrate the concourse level or enhance natural air circulation in order to enhance the passenger experience and improve site access, safety and wayfinding. This alternative would also, in the long term, fail to address the leaking and maintenance issues currently experienced at the station because it would not address the inherent design flaws of the existing canopy and the recurring issues with leaking and water retention that result from the flat roof design of the structure.

Although the cost to repair the roof is substantially lower than the cost to replace the canopy and reconfigure the plaza, it is a temporary solution that will not result in any long-term improvement at the station. The leaks and long-term maintenance issues that are experienced today will return under this alternative. Moreover, repairs in kind to address current leaks would not address future repairs that will eventually be required for the canopy's complex structural system. Those future structural repairs would be cost prohibitive due to the intricacies in the canopy's method of construction, which makes repairs of individual concrete elements unfeasible. The canopy roof is constructed from a series of prestressed precast concrete hollow core slabs supported by post-tensioned precast concrete beams. Due to this method of construction, the complexity of the system does not lend itself to the cutting or rearranging of individual concrete elements once the post-tensioning is installed. Therefore, the individual areas of the beams cannot be replaced, and if a repair is needed, the entire slab would need to be reconstructed. This also means that regular inspection and monitoring of the current canopy's structural integrity is complicated because condition inspection would require taking boring samples that could potentially impact the post-tension cable. This alternative would also not address the deficiencies to the existing stormwater management system. Additional trenches or piping would be needed to correct those deficiencies and the costs to retrofit stormwater management drains on the site is unknown. Further investigation would be needed to understand the scope of the repairs and costs associated with the installation of new drainage structures.

For these reasons, maintaining the existing canopy by repairing or reconstructing it would not meet the Project's purpose and need. Retaining the canopy does not allow for project components such as opening up the plaza, removing visual barriers, and maximizing natural light to create a more engaging, safer and pedestrian-friendly space. This alternative is not considered a prudent alternative to avoid the use of the Section 4(f) resource.

14.4.3 Measures to Minimize Harm

In addition to a determination that there is no feasible and prudent alternative that avoids the use of a Section 4(f) resource, the Section 4(f) regulations also state that the FTA may not approve the use of a Section 4(f) resource

unless it determines that the Project includes all possible planning, as defined in 23 CFR § 774.17, to minimize harm to the property resulting from such use.

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

The FTA, with assistance from the Georgia SHPO and other consulting parties will resolve adverse effects in accordance with the terms of a Section 106 Memorandum of Agreement. The draft Memorandum of Agreement is included in Appendix B of the EA and will be finalized following public comment and the results of coordination with the Georgia SHPO and other Section 106 consulting parties.

14.5 SECTION 4(F) CONCLUSION

This document has been prepared pursuant to the requirements of Section 4(f) of the Department of Transportation Act of 1966.

The No Build Alternative and other avoidance alternative were examined and will not meet the Project's purpose and need, and thus were dismissed. Therefore, there is no feasible and prudent alternative to the use of the Section 4(f) resource and the Project, including adherence to the stipulations in the Section 106 Memorandum of Agreement, includes all possible planning to minimize harm to the resource resulting from such use.

Agencies and the public will be afforded an opportunity to review and comment on the effects of the Project on the Section 4(f) resources as part of the public comment period for the EA and Section 4(f) Evaluation.

15. Summary of Public and Agency Participation

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

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

Upon completion of the Technical Feasibility Study, MARTA began the concept design process to further develop the vision. MARTA conducts regular coordination with key stakeholders at project milestones, including the City of Atlanta, Central Atlanta Progress, Atlanta Downtown Neighborhood Association, as well as the primary developers of the adjacent sites, including CIM Group and Newport Development among others through each stage of project development. Public engagement activities for the conceptual design of the Five Points Transformation Project were conducted between September 18, 2022, and December 9, 2022. The public was supportive of the project and generally focused comments on safety and security of the station. A summary of outreach activities is in Appendix F. The first event was a pop-up event on September 18, 2022, at Five Points Station where the concepts were displayed and participants asked for feedback. Over 200 people were engaged during the event. MARTA held a virtual and in-person Open House on October 18, 2022, with over 120 participants in attendance. MARTA held six additional pop-up events at MARTA end-of-line stations in November 2022 at Indian Creek, College Park, H.E. Holmes, Bankhead, Doraville and North Springs stations. The primary comments received during these events focused on station safety and cleanliness, activation of the station area with more art and better signage, and improved pedestrian accommodations. In total between in-person events and online engagement approximately 2,012 people were engaged in the process providing 692 comments. Common themes for desired improvements were a more welcoming atmosphere, increased safety, better pedestrian access, and inclusion of local art/artists.

APPENDIX

APPENDIX A – ROOF CONDITION ASSESSMENT

APPENDIX B – CONCEPT DOCUMENT

APPENDIX C – TRAFFIC ANALYSIS AND BUS OPERATIONS CONCEPTS

APPENDIX D – HISTORIC RESOURCES REPORTS (DOE AND AOE)

APPENDIX E – NOISE IMPACT ASSESSMENT

APPENDIX F – CONCEPT PHASE PUBLIC ENGAGEMENT SUMMARY