



HISTORIC PRESERVATION DIVISION

MARK WILLIAMS
COMMISSIONER

DR. DAVID CRASS
DIVISION DIRECTOR

December 1, 2017

Yvette G. Taylor, Ph.D.
Regional Administrator
Federal Transit Administration, Region IV
230 Peachtree Street NW, Suite 1400
Atlanta, Georgia 30303
Attn: Julia Carrie Walker

**RE: Juniper Street Improvements, 14th Street to Ponce de Leon Avenue, Atlanta
Fulton County, Georgia
HP-171103-004**

Dear Dr. Taylor:

The Historic Preservation Division (HPD) has reviewed the draft reports entitled, *Juniper Streetscape Historic Resources Survey Report and Assessment of Effects* and *Juniper Streetscape Phase I Archaeology Survey Report, Assessment of Effects, and Data Recovery Plan for 9FU681*, both prepared by Edwards-Pitman Environmental, Inc. and dated October 2017 and August 2017, respectively. Our comments are offered to assist the Federal Transit Administration (FTA) and its applicants in complying with the provisions of Section 106 of the National Historic Preservation Act (NHPA).

The subject project consists of crosswalk and sidewalk improvements along with lane reduction and designated on-street parking along Juniper Street in Atlanta, from 14th Street to Ponce de Leon Avenue. Based on the information provided, HPD concurs that resources 1, 2, 3 4, 5, 6, 7, and 9 are not eligible for listing in the National Register of Historic Places (NRHP). Additionally, HPD concurs that the Bon Air Apartments, Evangelical Lutheran Church of the Redeemer, Atlanta Hospital, and site 9FU681 are eligible for listing in the NRHP. Furthermore, HPD finds that the subject project, as proposed, will have **no adverse effect** to historic resources within its area of potential effects (APE), as defined in 36 CFR Part 800.5(b), **provided the following condition is met:**

1. Adequate protective measures should be utilized to ensure historic features, including walls, edging, curbing, stairs, pavers, fencing, and lawns, within or adjacent to the project area are not damaged by construction activities.

Additionally, HPD concurs that the proposed project constitutes an **adverse effect** to archaeological resources located within the subject project's APE, as defined in 36 CFR Part 800.5(a)(2).

When an adverse effect to a historic property is found, the federal agency must notify the Advisory Council on Historic Preservation and consult with the State Historic Preservation Officer on ways to avoid or reduce adverse effects to historic properties. HPD would like to make it clear that this determination of an adverse effect is not the end of the consultation process. HPD should be given the opportunity to review and comment on alternate approaches, as they become available, prior to proceeding with the work, as part of a selection process to choose an appropriate plan that will conform to a more favorable effects assessment. We would like to work with FTA in finding ways to avoid, minimize or mitigate this adverse effect. We look forward to discussing these options with you and working with you as this project progresses.

Regarding the research design for archaeology site 9FU681, HPD concurs that the research design is adequate to recover the important information contained at site 9FU681 and from historic documentation sources. HPD recommends that all photographic documentation of the exposed track segments be conducted by a Secretary of the Interior's-qualified professional with knowledge of archaeological photographic standards. Additionally, HPD recommends clarifying what constitutes a "suitably high degree of integrity" sufficient for additional archaeological excavation and documentation.

Please refer to project number **HP-171103-004** in any future correspondence regarding this project. If we may be of further assistance, please do not hesitate to contact Jennifer Dixon, Environmental Review Program Manager, at jennifer.dixon@dnr.ga.gov or (770) 389-7851.

V/r,

A handwritten signature in blue ink that reads "Dave Crass". The signature is written in a cursive style with a large initial "D".

Dr. David Crass
Division Director
Deputy State Historic Preservation Officer

DCC/jad

Cc: Allison Duncan, Atlanta Regional Commission