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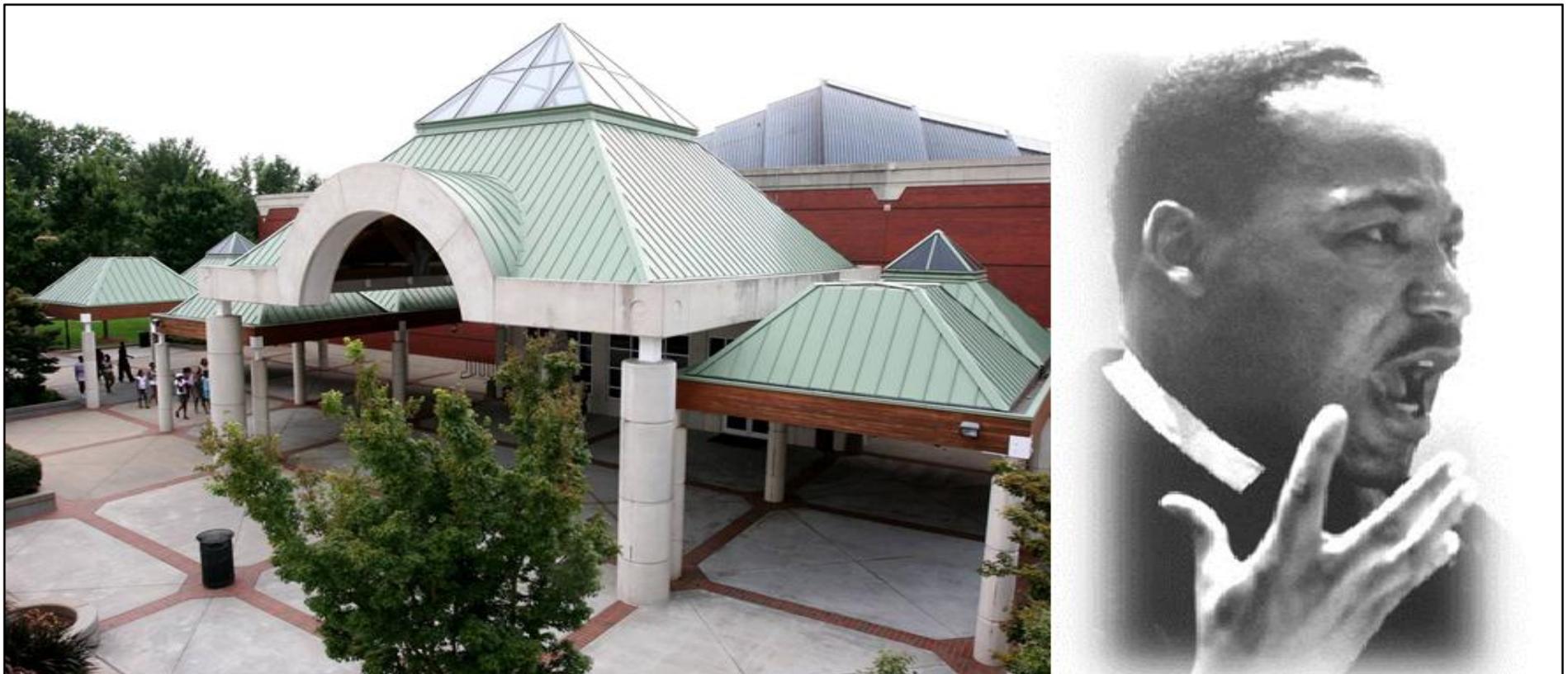
Martin Luther King, Jr. National Historic Site  
Atlanta, Georgia



# Martin Luther King, Jr. National Historic Site

## *Commercial Services Strategy*

July 2013



DRAFT

## Acknowledgements

**This Commercial Services Strategy was prepared for Martin Luther King, Jr. National Historic Site (Martin Luther King, Jr. NHS) by the Business Management Group. Thanks are due to the following individuals for their generous help and support.**

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Courtesy of the National Park Service

## Signatures

**This Commercial Services Strategy has been recommended for implementation by the park Superintendent and approved by the Regional Director.**

**Recommended**

**Approved**

\_\_\_\_\_  
**Park Superintendent**

\_\_\_\_\_  
**Date**

\_\_\_\_\_  
**Regional Director**

\_\_\_\_\_  
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# Executive Summary

<to be completed after Public Meeting...>

# Commercial Services Strategy Purpose and Methodology

Martin Luther King, Jr. National Historic Site (Martin Luther King, Jr. NHS) developed a Commercial Services Strategy (CSS) to identify opportunities to enhance the park's mission and the visitor experience through the introduction of commercial services. The National Park Service (NPS) defines commercial services as any product, activity, or service offered to park visitors that uses park resources, and for which compensation is made to a third party. Commercial services play a vital role by offering park visitors services and activities that the government does not provide directly to the public.

A Commercial Services Strategy allows a park to:

- Describe park conditions for visitor use and commercial services as well as any relevant management policies;
- Detail potential commercial service opportunities as recommended by park staff, volunteers, partners, visitors, members of the public, and other relevant stakeholders;
- Create a necessary and appropriate criteria framework for quickly and easily evaluating commercial services;
- Map existing and potential services to the necessary and appropriate criteria framework and provide reasoning behind services deemed inappropriate;
- Determine high priority commercial services, ideal locations, and authorization vehicles;
- Outline an action plan for implementation

A variety of stakeholders provide input throughout the development of a CSS. Incorporating feedback from park staff, partners, volunteers, visitors, and the public ensures the document represents the perspective of the park's diverse stakeholder groups.

The CSS is typically a five-year strategy but can be updated to respond to changing conditions or proposals of new services. While the CSS identifies and validates future commitments of resources, it does not act as a compliance document, nor does it assess environmental impact. The park Superintendent recommends the final CSS and the Regional Director provides final approval.

## *Methodology*

This Commercial Service Strategy, written in the spring of 2013, began with a review of Martin Luther King, Jr. NHS' planning documents, including but not limited to, the 1985 General Management Plan and subsequent 1994 addendum, 2013 Long Range Interpretive Plan, 1997 Visitor Resource Study, 1995 Cultural Landscapes Report, and a draft of the 2013 Historic Structures Report, in conjunction with regional and park specific demographic data and tourism trends.

This report involved stakeholder feedback provided through focus groups conducted in early November 2012 as part of the park's Visitor Resource Study, conducted by the University of Idaho. Specifically, these focus groups consisted of two park partnership meetings (attended by nineteen partner representatives) and seven visitor focus groups (attended by thirty-four visitors). Concurrently, the Business Management Group conducted interviews with the management team, park staff members, as well as key park stakeholders.

Park management utilized the insights gained through the described methods to develop necessary and appropriate criteria and commercial service priorities for the park. These priorities were analyzed for policy and regulatory feasibility and vetted with the local community and park stakeholders during a public meeting, held on xx.

# Overview of NPS Commercial Services

The National Park Service defines commercial services as any activity or service that occurs in a park for which compensation is made. By law, the park superintendent must authorize all commercial services in writing. The three primary forms of commercial services include concession contracts, Commercial Use Authorizations (CUAs), and leases.

## *Concessions Contracts*

NPS provides commercial visitor services such as food, lodging, and retail through a third party business (concessioner) using a formal, legally binding concession contract. Concessioners must adhere to both necessary and appropriate standards to operate in the park. The National Park Service approves and authorizes all concession operations under delegation of authority through the preparation of a prospectus (solicitation of offers), review of proposals, selection of concessioners, and final contract execution. The 36 Code of Federal Regulations (36 CFR 51), issued April, 2000, details the described procedures.

Concession contracts constitute legal agreements between the Secretary of the Interior (or authorized delegate) and a concessioner that specify the range of facilities accommodation and services types the concessioner agrees to offer. By law, parks must issue all contracts by competitive bid. The typical contract holds a 10 year term, although under certain financial situations can extend up to 20 years with specific approval from the NPS Director.

The 1998 Concessions Management Improvement Act established three distinct contract categories. Parks may issue a *Category I* contract when the concessioner has or may obtain a leasehold surrender interest (LSI) by constructing or installing capital improvements within the park. A *Category II* contract is used in situations where a concessioner will operate on assigned land or in an assigned concession facility but will not be allowed to construct or install capital improvements. Finally, a park can issue a *Category III* contract in situations where no lands or buildings are assigned to the concessioner.

Concessioners pay franchise fees for the privileges granted by a concession contract. Franchise fees can consist of a percentage of gross receipts or a flat fee. Minimum franchise fees are determined through a

financial franchise fee analysis, and a competitive bidding process determines the final franchise fee. Eighty percent of franchise fees stay at the park, while the National Park Service Commercial Services Program retains the remaining 20%. Park cannot use these fees to fund permanent positions or expenditures that would normally be the concessioner's responsibility. They must be used for "purposes of funding high-priority and urgently necessary resource management programs and operations."

## *Commercial Use Authorizations*

NPS grants Commercial Use Authorizations to private businesses for commercial activities that have minimal impact on park resources, providing a relatively simple means of authorizing suitable commercial services to park visitors. CUA services must be deemed appropriate for the park unit, but do not have to meet necessary criteria. CUA holders typically do not have facilities inside the park. These out-of-park CUA services must originate and terminate outside the boundaries of the park. Small CUAs that gross less than \$25,000 annually may operate within park boundaries and can provide services that originate and terminate inside the park. Parks may not limit the number of CUAs issued for an activity unless supported by other approved policies and processes.

Commercial Use Authorizations are issued for a maximum of two years, and most typically for one year. Authorizations may be renewed contingent upon satisfactory performance and typically contain operating conditions or stipulations that designate use, such as defining specific locations and number of service days.

Monitoring of all commercial activities ensures that business operations occur in a safe, fair, and reputable manner consistent with the mission of the park. Additionally, monitoring supports compliance with resource protection conditions stated in the permit. The Cost Recovery Act authorizes NPS to collect all costs associated with CUAs. Three primary cost types determine the dollar amount that can be charged: application, administrative, and monitoring costs. (See Figure 1)

Figure 1: Elements of CUA Cost Recovery

Type of Cost	Costs Incurred	Typical Costing Method
Application	Costs that begin with the request for the use of park resources and end with the submission of an application form	Average costs derived from historical records
Administrative	Costs that begin when the completed application form is received and end with the final signing of the permit	Average cost derived from historical record
Monitoring	Costs that start when the CUA arrives in the park to perform permitted uses and end when the permitted use is over and the CUA leaves the area	Must reflect actual itemized costs

**Leases**

Current leasing authority authorizes exclusive use and possession of NPS buildings and associated land, or historic land for historic purposes (e.g., agricultural uses on a historic farm) for a specified period of time. The property must be considered unnecessary for the operation and use of the park and the proposed activity must not be subject to authorization through a concession contract, Commercial Use Authorization, or similar instrument. Parks may lease properties only for an activity and in a manner that is not inconsistent with the purposes established by law for the park.

Leases require, at a minimum, Fair Market Value Rent (FMV) consideration, and per DOI policy, the DOI Office of Valuation Services must approve all FMV appraisals. Parks compete any leasing opportunity unless the lease belongs to a non-profit or governmental entity, or has a term less than sixty days. Leases must go through NEPA compliance except when leasing historic properties in accordance with 36 CFR Park 18 and NPS-38.

Historic leases are subject to section 106 of the National Historic Preservation Act, which requires federal agencies to take into account

the effects of their undertakings on historic properties and to afford the Advisory Council on Historic Preservation a reasonable opportunity to comment. For Martin Luther King, Jr. NHS, Section 7 (c) of its enabling legislation also requires “plans for the construction, exterior renovation, or demolition of any structure or change in land use within the preservation district by the National Park Service or any Federal agency must be submitted to the Atlanta Urban Design Commission in a timely fashion for its review and comment.”

NPS recommends for all leases to have as short a term as possible, taking into account the financial obligation of the lessee and other factors related to determining an appropriate lease term. No lease shall have a term of more than 60 years.

**Special Use Permits**

In addition to the three primary commercial service authorizations described, park superintendents may authorize special events, as long as they meet the same criteria as other special park uses and provided the event contributes to visitor understanding of the park.

NPS does not permit the staging of special events that are conducted primarily for the material or financial benefit of participants or that involve commercialization, advertising, or publicity by participants. Parks may not permit events that charge a separate public admission fee unless the event is directly related to the purposes for which the park was established.

Figure 2 summarizes much of the information in this section and allows for quick comparisons of the various commercial services categories available to parks. Appendix A provides additional detail on the primary commercial service authorizations as well as an overview of other commercial services tools, such as commercial filming and photography and Rights-of-Way permits.

Figure 2: Overview of Commercial Service Authorizations

	Instrument			
	Concession Contract	Commercial Use Authorization (CUA)	Lease	Special Use Permit
Description	Visitor services such as food, lodging, and retail provided through a third party business under a formal, legally binding contract.	Authorization to provide visitor services that have minimal impact on park resources. CUAs do not typically require in-park facilities.	Exclusive use and possession of NPS buildings for a specified period of time for activities that are consistent with the mission and values of the NPS but not subject to authorization as a concessions contract or CUA.	Activities in the park that benefit an individual or group rather than the general public, require NPS management, and do not impair resources.
Types	<p><u>Category I:</u> May obtain leasehold surrender interest (LSI) by constructing or installing capital improvements within a park.</p> <p><u>Category II:</u> Operates on assigned land or assigned concession facility but will not be allowed to construct or install capital improvements</p> <p><u>Category III:</u> No lands or buildings are assigned to the concessioner</p>	<p><u>In-park:</u> Gross receipts less than \$25,000; allowed to conduct business and be assigned an area within park boundaries</p> <p><u>Out-of-park:</u> Gross receipts more than \$25,000; cannot conduct business or be assigned an area inside park boundaries</p>	<p><u>Historic properties:</u> 39 ½ year lease - 20% tax credit of restoration (for income producing properties only)</p> <p><u>Short-term:</u> Up to 60 day lease that can be issued non-competitively. Ideal for events, weddings, etc.</p>	Includes Commercial Filming and Photography, Special Events, Rights-of-Way, and Use and Occupancy (refer to Appendix A)
Necessary & Appropriate Criteria Requirement	Necessary & appropriate	Appropriate only	Appropriate only	Appropriate only
Length	10-20 year contract	Up to 2 years	Up to 60 years	Up to 5 years
Fee Structure	Franchise fee – 80% retained by park. Retained funds must be used for visitor services as well as high-priority resource management programs and operations, and can fund term or seasonal positions directly related to these projects. 80% funds cannot be used to fund permanent positions.	Cost recovery only	Rental fee – 100% retained by park. Retained funds must be used to finance park repairs, renovations, maintenance of park facilities, and infrastructure.	Cost recovery only
Regulatory Mechanisms	36 CFR Part 51; Director’s Order #48A; Public Law 105-391	16 USC 5966; Director’s Order #48B	36 CFR Part 18	Director’s Order #53; Director’s Order #21; 36 CFR 2.50; 36 CFR 7.96

# Overview of Martin Luther King, Jr. National Historic Site

On October 10, 1980, Congress established Martin Luther King, Jr., National Historic Site and the Martin Luther King, Jr. Preservation District “in order to protect and interpret for the benefit, inspiration, and education of present and future generations the places where Martin Luther King, Junior, was born, where he lived, worked, worshipped, and where he is buried.” (Public Law 96-428). The park consists of 38.38 acres, 13.08 of which are federally owned. Thousands of visitors come annually to learn about the life experiences and the significance of one of the most influential men in the 20<sup>th</sup> century.

## *Park History and Background*

Dr. Martin Luther King, Jr., a leader of the modern American Civil Rights Movement, is known and honored throughout the world for his leadership in the struggle for equality and for his philosophy of nonviolent social change. The Martin Luther King, Jr. National Historic Site, located in the historic east side Atlanta community where King was reared and to which he later returned in the height of his activism, commemorates King's lifetime achievements. The park preserves the King Birth Home and the immediate historic neighborhood where King spent his youth. The larger “Sweet Auburn” community served as the economic, cultural, and religious center for Atlanta's segregated black population from 1910 through the 1960s and greatly influenced King throughout his life.

The protection and interpretation of this historic neighborhood allows present and future generations to see the area as Dr. King knew it when he was a child. By experiencing the places where he was born, worked, worshipped, and is buried, visitors learn to understand Dr. King and his leadership of the modern American Civil Rights Movement.

Major resources of the park include the Birth Home of Dr. Martin Luther King, Jr.; Ebenezer Baptist Church (Dr. King's spiritual home and the church where he served as co-pastor with his father from 1960 to 1968), the Martin Luther King, Jr. Center for Nonviolent Social Change (“The King Center”) where Dr. King is buried, and the Historic Fire Station No. 6. The park consists of the Birth Home block, as well as a significant portion of the residential neighborhood where Martin Luther King, Jr. spent his childhood. Additionally, the park includes a portion of

Edgewood Avenue, which preserves the flavor of the historic commercial portion of the community. In all, the park manages 67 historic structures, most of which were built between 1890 and 1910.

The Martin Luther King, Jr. Preservation District surrounds the National Historic Site and encompasses Dr. King's broader childhood environment. The area includes 230 historic structures in both commercial and residential portions of the Sweet Auburn and Old Fourth Ward neighborhoods. Within the preservation district, NPS assists owners of historic structures to preserve and interpret their properties. (See Figure 4 for a map of Martin Luther King, Jr. NHS and Preservation District)

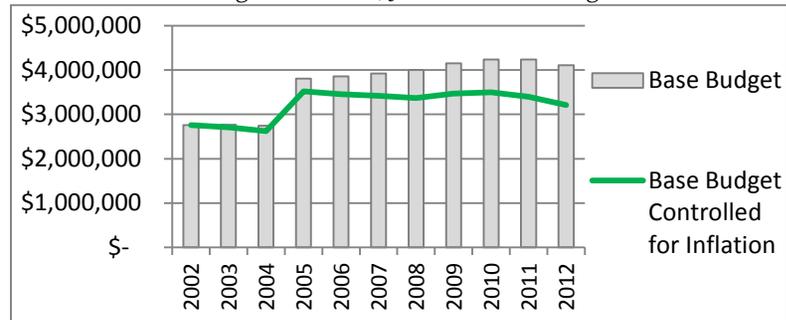


Dr. King Birth Home

**Park Operations and Current Commercial Services**

In FY 2012 Martin Luther King, Jr. NHS managed a base budget of \$4,239,000, a 3% decrease from FY 2011. The park employed 33.1 full-time equivalents in FY 2012 and received over 703,600 visitors.<sup>1</sup>

Figure 3: MLK, Jr. NHS Base Budget



Currently, no concessionaires or Commercial Use Authorization holders, outside the park’s bookstore, operate within Martin Luther King, Jr. NHS, and have historically never done so. However, the park does manage a leasing program to the broader community. The park rents twenty-eight units along Auburn Avenue and Boulevard Northeast to the general public as housing, and ten units to park partner organizations, a barbershop, and as short-term rentals to government employees and volunteers. In FY 2012, the park collected \$197,582 in rental revenue. The park uses these funds to finance repairs, renovations, maintenance of its facilities, which in turn frees up base funds for other park operations.

The park’s cooperating association, Eastern National, operates a bookstore located at 497 Auburn Ave, the facility immediately adjacent to the Martin Luther King, Jr. Birth Home. The bookstore sells posters, books, recorded speeches, and other interpretive educational items to park visitors. In FY 2012, store sales exceeded \$388,400 (\$0.55/visitor), a 14% increase from FY 2011, when the bookstore brought in \$339,454 (\$0.54/visitor) in total sales.

**Key Partnerships**

Within park boundaries, partner organizations fully manage The King Center and Ebenezer Baptist Church. Established in 1968 by Mrs.

Coretta Scott King, The King Center preserves and operates the Freedom Hall Complex and The King Center Administrative, Library, and Archives Facility. The latter building holds the largest collection of documents, photographs, and memorabilia related to Dr. and Mrs. King’s involvement in the modern American Civil Rights Movement.

The historic Ebenezer Baptist Church, where Dr. King and his father Martin Luther King, Sr. pastored, has operated since 1886 and continues to provide urban-based, global ministry to the community. In November 2012, Ebenezer Baptist Church opened the Martin Luther King, Sr. Community Resource Center. The center, located next to the Martin Luther King, Jr. NHS’ Visitor Center, offers a large conference space (seating capacity: 500 reception style or 275 banquet style). Additionally, the complex provides boxed lunches and a catering service Monday through Friday. In the future years, the center hopes to open a café for visitors and expand its operations to include weekend hours.

Outside of park boundaries, the larger Preservation District protects the surviving core elements of the Sweet Auburn community’s commercial district, including the headquarters of the Southern Christian Leadership Conference at Prince Hall.

To park visitors, Martin Luther King, Jr. NHS, The King Center, Ebenezer Baptist Church, and the larger Preservation District operate as one cohesive experience. Therefore, commercial service activities provided at the park must take into consideration any impact on park partners and the surrounding community. All commercial service recommendations proposed in this document aim to enhance and improve the overall visitor experience across the park and its stakeholders. The park strives not to compete with its partners’ offerings, but rather to provide complementary services and activities for the benefit of the public.



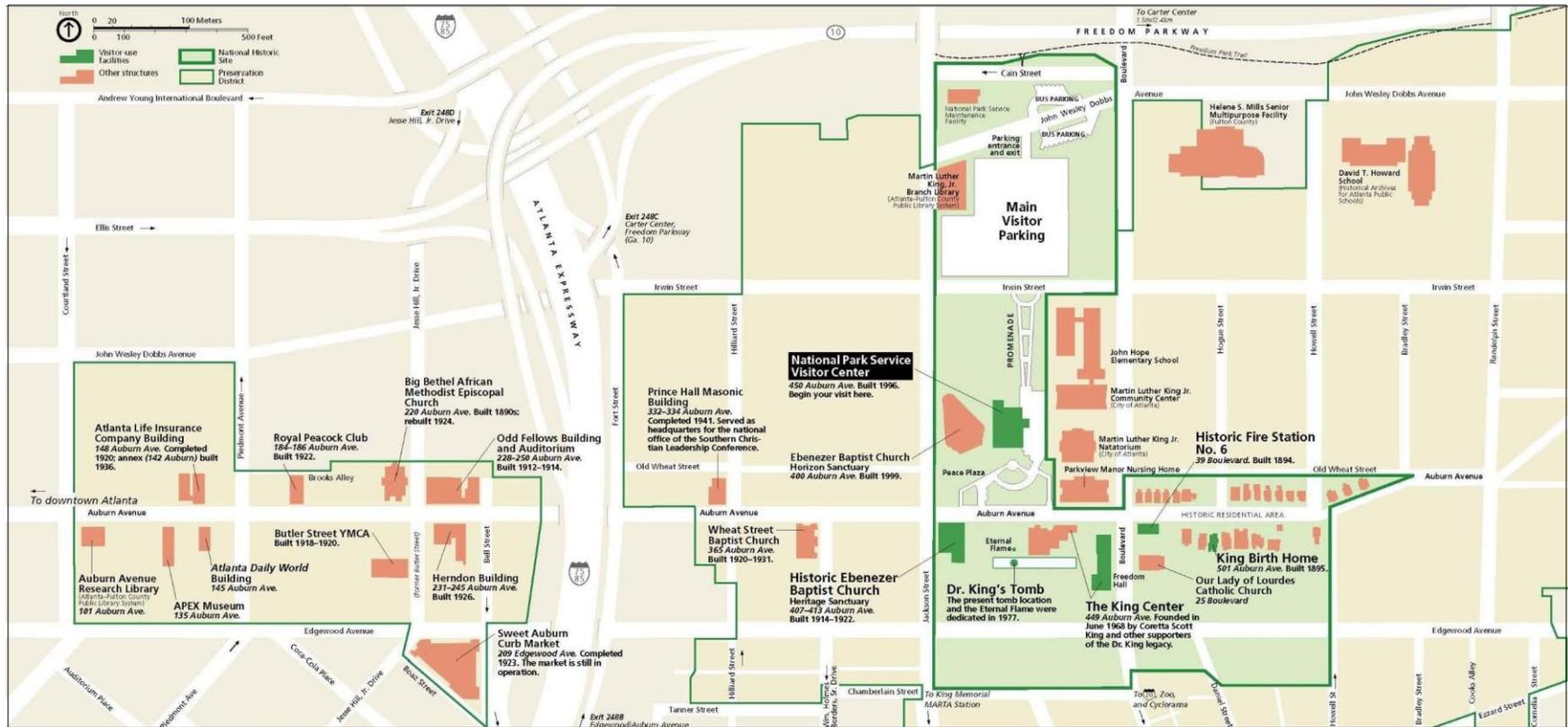
Ebenezer Baptist Church



Freedom Hall Complex, The King Center

<sup>1</sup>: A full-time equivalent is equal to 2,080 hours of work per year. Martin Luther King, Jr. NHS

Figure 4: Map of Martin Luther King, Jr. National Historic Site



# Park-wide Management Policies

Park-specific policies provide guidance on how a park should manage and protect its resources and help determine the types of commercial service activities that can occur within a park. The following management policies are summarized from the Martin Luther King, Jr. NHS 1985 General Management Plan (GMP) and 1994 addendum, along with input provided by the park's general management team.

Commercial services must comply with the following policies in order to operate within the park:

**Good Relations with Park Stakeholders:** The park values good relations with its partners, lessees, the surrounding community, and local officials. Commercial services will not negatively impact these stakeholders, but rather seek to strengthen and enhance their respective relationship with the park. The park will proactively address any conflicts that may arise over commercial services.

**Historic Structures, Districts and Cultural Landscapes:** A primary mission of the park is to restore, preserve, and educate visitors about the many historic structures that comprise Dr. King's Birth Home block and the larger Sweet Auburn and Old Fourth Ward neighborhoods. The park encourages commercial services that stimulate the rehabilitation and adaptive re-use of these historic buildings and educate visitors about the historical, cultural, and architectural values of the park's resources. Commercial services must not impede the park's ability to preserve, protect, and maintain its historic structures and cultural landscapes.

**Museum Collections:** The park's museum collections preserve those features of the park that cannot safely be left onsite, and serves the needs of staff and visitors. Commercial services may help promote existing and future museum collections for education, interpretation, and research. Commercial services will not interfere with the preservation or access of the general public to any existing or future collections.

**Visitor Experience and Park Use Requirements:** The park strives to create a high quality and educational experience for visitors. Commercial services should actively enhance visitor use while maintaining the values and purpose for which the park was established.

Commercial services should attempt to be universally accessible and must comply with any park regulations governing visitor use and behavior, such as state, local, and federal firearms laws. Additionally, any services provided at the park should minimize visitor congestion at or around critical park sites.

**Transportation:** Visitors most frequently use automobile transportation to access the park. In future years, visitors may also take the Atlanta Streetcar (expected completion date of spring 2014). Once at the park, visitors typically walk to the variety of attractions available at the historic site. If the park decides to pursue commercial services that affect transportation within the park, a high level of visitor safety must be maintained through appropriate speed and safety precautions.

**Air Quality:** Martin Luther King, Jr. NHS remains an urban park centrally located in a major metropolitan city. As commercial services are added to the park, they will be managed in ways that limit impacts to regional air quality.

## ***Management Zones***

Martin Luther King, Jr. NHS' General Management Plan defines specific management zones for the park. The management zoning system serves as a guide for operating lands and other resources to achieve park purposes and management objectives. The GMP categorizes the entire park as a historic zone, with an emphasis placed on preservation, protection, and interpretation of cultural resources and their settings. The park has identified the following subzones for the historic site:

### **Preservation/Restoration Subzone**

Emphasis on preservation and restoration, including facades and yards visible from Auburn Avenue along the Birth Home block, to reflect the period 1929-1941, for interpretation and visitor enjoyment.

### **Preservation/Rehabilitation Subzone**

Emphasis on preservation and rehabilitation of historic scenes, including historic structures, grounds and streetscapes.

### **Preservation/Special Use Subzone**

Emphasis on preservation of the historic scene through rehabilitation of historic building facades and control of changes to non-historic and historic commercial, institutional, and residential properties that will continue to be owned by private and other non-federal interests. This subzone includes areas that may be compatible for infill construction and existing and future recreation and community development.

Commemoration/Visitor Services Subzone

Emphasis on provision of visitor facilities and information in areas designated to commemorate the life of Dr. King and the Sweet Auburn community.

Park Development Subzone

Emphasis on providing facilities for interpretive and park administrative use as well as visitor parking.

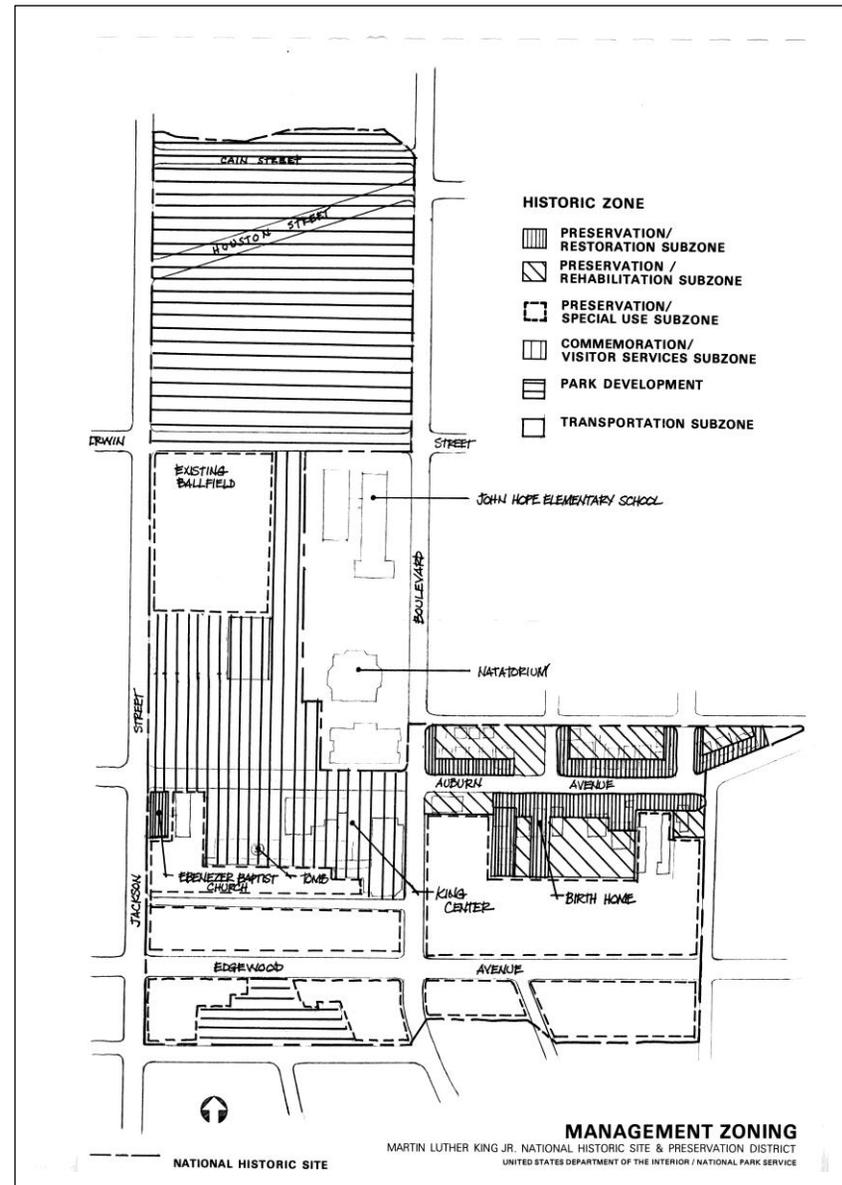
Transportation Subzone

Emphasis on providing for vehicular access through continued use of public right-of-way.

As the preservation/restoration and preservation/rehabilitation subzones have the highest level of protection, commercial services should be limited in these areas. Any commercial services provided in preservation/restoration and preservation/rehabilitation subzones should maintain and promote the historic setting, and if possible, provide interpretive value to visitors. In these two subzones, the park prefers commercial services that assist in restoring and rehabilitating historic structures and landscapes.

The park encourages commercial services in the preservation/special use, commemoration/visitor services, and the park development subzones. Commercial services related to transportation, such as a shuttle service or bus tour, may be appropriate in the transportation subzone, so long as they do not impede visitor access.

Figure 5: Management Zones, General Management Plan Addendum, 1994



# Park Conditions for Commercial Services

## Visitation

More than 703,600 visitors came to Martin Luther King, Jr. NHS in FY 2012, a comparable number to previous years. The highest visitation rates are in January, especially on and around Martin Luther King, Jr. Day. The park celebrates King Week, the third week of January, with a variety of special events and programs that draw upon notable political figures and civil rights leaders. Besides the January influx, park visitation is higher in late spring and summer and lower in the late summer and early winter.

Figure 6: Annual Recreational Visitors at MLK, Jr. NHS

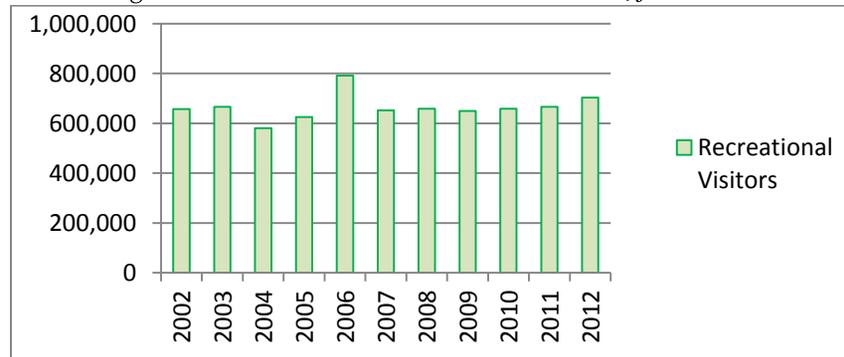
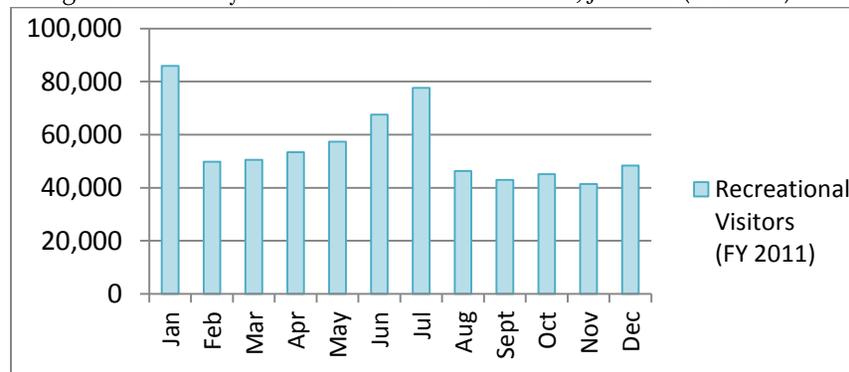


Figure 7: Monthly Recreational Visitors at MLK, Jr. NHS (FY 2011)



Martin Luther King, Jr. NHS' 2011 Long Range Interpretive Plan describes the following visitor categories:

- **School groups** – the most numerous organized group visiting the park, accounting for one-half of all park groups. School groups range from preschool to college. Most school groups visits help facilitate meeting certain curriculum standards and include an educational experience on-site, such as a ranger-led talk and a teacher-led park activity.
- **Adult groups** – includes commercial tour groups, church groups, family reunions, and education groups, many of which visit in the park in the spring and fall
- **International visitors** – according to the most recently completed visitor survey (1997), international visitors account for 10% of park visitation
- **Local residents** – many local residents bring out-of-town guests for special visits
- **Conventioneers** – Atlanta hosts numerous conferences and conventions, many of which provide time for their participants to visit the park
- **Subject matter enthusiasts and repeat visitors** – includes professors and individuals with a strong desire to learn and experience history
- **Dignitaries** – a large number of Southeast Regional Consulate General offices are located in Atlanta and request to tour the park
- **Military groups** – approximately fifteen groups visit annually, and typically represent the U.S. Army, Air Force, and Navy
- **Organized sporting groups** – includes professional, college, and high school teams

The park's Long Range Interpretive Plan describes an opportunity to encourage greater visitation from the "Generation Y" demographic as well as local residents and suburban Atlantans. Anecdotally, visitation barriers for these groups include a lack of knowledge of the American

Civil Right Movement among younger generations who were not alive during the time period, as well as the perception that the park resides in an unsafe area.

**Park Facilities and Sites Suitable for Commercial Services**

The majority of the park’s nationally significant or contributing historic resources sit along the Birth Home block. Since its establishment, the park has prioritized restoring the facades of these structures and rehabilitating the interiors for adaptive use. Park planning documents recommend the park manage resources to accurately reflect the 1929-1941 period. Additionally, the park’s 1995 Cultural Landscape Report describes that some commercial activity should be reintroduced in the Birth Home block, with historic locations of stores being considered as potential commercial in-fill projects. Park planning documents describe that historic commercial uses of Fourth Ward buildings have included small grocery stores, restaurants, a café and soda fountain, and a butcher shop. Among Martin Luther King, Jr. NHS’ facilities, seven currently vacant structures and sites may be suitable for commercial services:

- **491 Auburn Ave. (“Delbridge-Hamilton Apartments”)** – Built in 1911 and the exterior stabilized in 2010, the two-story, hip-roofed four unit apartment building measures 36’ x 53’. This rectangular-plan building has a continuous concrete block foundation, a full-width porch, and balcony. A Historic Structure Report conducted for the building in 2013<sup>2</sup> suggests the rehabilitation of this structure for “long-term lease, month-to-month rental, or . . . as a bed-and-breakfast or an inn” as one potential use for the building. (#33 in Figure 8)
- **493 A, B, and C Auburn Ave.** – Three identical 28’ x 32’ hip-roofed double shotgun duplexes sit in a row behind the Birth Home. Featuring a two-room deep plan, these houses each have a brick pier foundation and front porch. The park rehabbed the exterior of all three shotgun houses in 2008-2009. (#40-42 in Figure 8). The park is currently in the process of completing a Historic Structure Report for these buildings.
- **530 Auburn Ave.** – Built in 1895, the two-story frame house features a hip roof, front-facing projecting gable, and rear additions. The park acquired this property in October, 2009.

(#25 in Figure 8)

- **445 Edgewood Ave.** – This half of a one-story, brick, parallelogram-shaped commercial duplex sits directly adjacent to a barbershop. The duplex unit consists of 1,080 square feet and contains two wood and glass storefronts. Built in 1909, the park previously used the facility as a maintenance building. (#57 in Figure 8)
- **Vacant lot at 461 Edgewood Ave. between Boulevard and Jackson St.** – This .61 acre vacant field on Edgewood Ave. once featured a park-owned modular building that has since been removed. (“Vacant Lot” in Figure 8)

In addition to these vacant or underutilized structures, the park believes the Visitor Center and visitor parking lot serve as ideal locations for potential commercial services. Current rental properties will not be considered for commercial service use at this time; the park will continue to uphold existing leases.



491 Auburn Ave.



493 B Auburn Ave., one of three shotgun houses



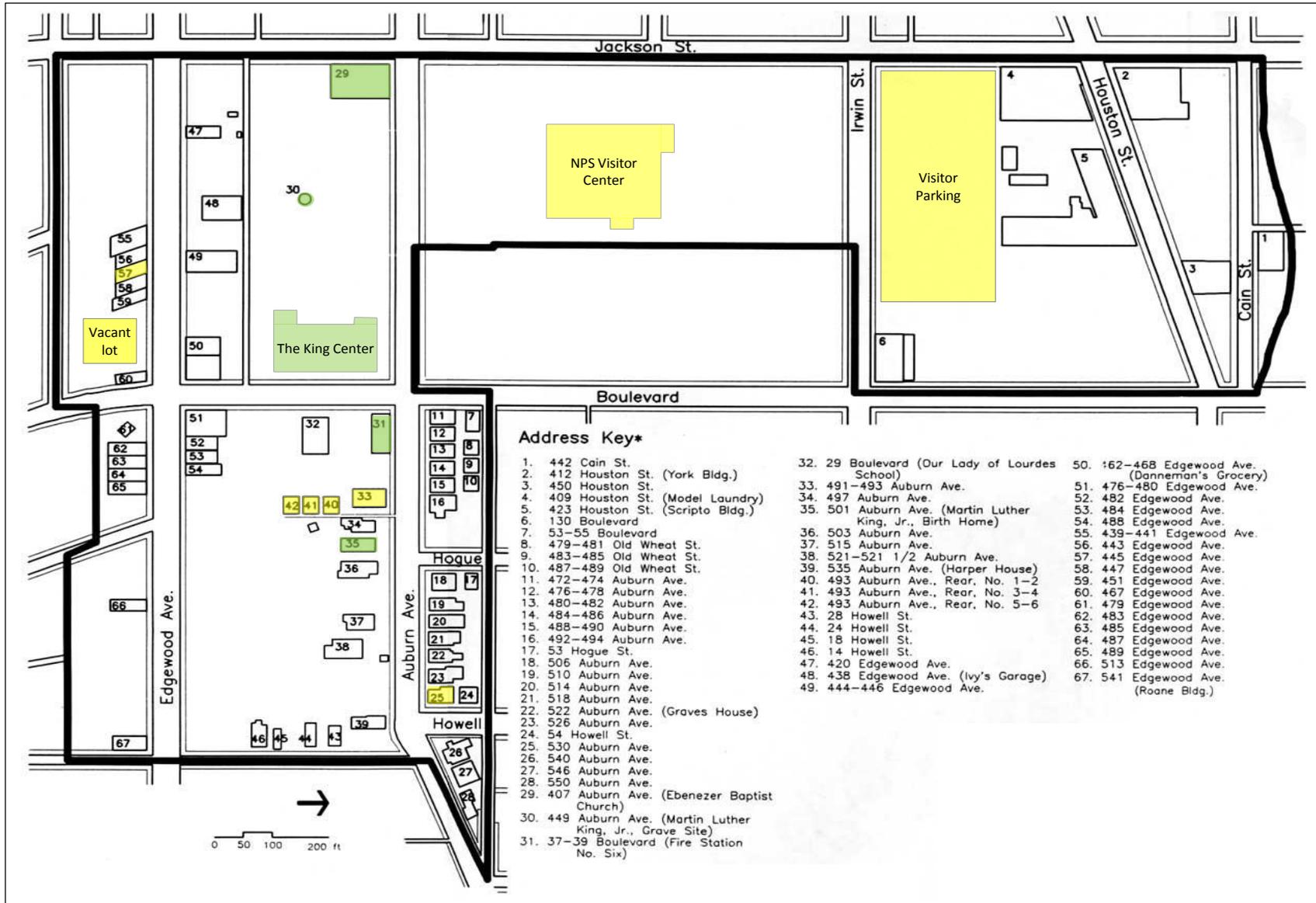
445 Edgewood Ave.



530 Auburn Ave.

2: The 2013 Historic Structure Report for 491 Auburn Ave. was in draft form during the development of the Commercial Services Strategy.

Figure 8: Map of Park Sites and Historic Buildings Suitable for Commercial Services



- Key park building
- Park facility or site that maybe suitable for commercial services

Figure 9: Aerial Map Illustrating Locations of Vacant Sites Suitable for Commercial Services



### *Local Economic and Tourism Trends*

Atlanta draws visitors from around the world, accounting for over half of Georgia's tourism, a state that saw a total tourism demand of \$31 billion in 2011<sup>3</sup>. Additionally, the Georgia visitor economy witnessed over 9.7% growth since 2010. As of 2010, Atlanta saw over 35 million visitors, making it the seventh-most visited city in the country.<sup>4</sup> Popular attractions located in close proximity to the park include the Georgia Aquarium – the world's largest indoor aquarium, World of Coca-Cola, and Underground Atlanta. (See Appendix B for a map of recreational attractions near the park.)

At the time of the park's establishment, the neighborhood in and adjacent to the Martin Luther King, Jr. NHS was deteriorating. Sweet Auburn, once named the "richest Negro street in the world" by Civil Rights leader John Wesley Dobbs, struggled economically by the early 70s due to out-migration, lack of investment, increased crime, and a highway construction project that divided the community in two. The National Trust for Historic Preservation recognized Sweet Auburn as one of America's 11 Most Endangered Historic Places in 1992.

In recent years, the Sweet Auburn and Old Fourth Ward neighborhoods have experienced an economic resurgence due to support from the park, the Historic District Development Corporation (which has preserved over 110 single family homes and constructed nearly 500 units of multifamily housing in the Sweet Auburn neighborhood), Central Atlanta Progress, and other community groups and private developers. Local restaurants and bars have begun to crop up along Edgewood Avenue and trendy new businesses attract a more cosmopolitan crowd to the area. Georgia State University's growing downtown campus also directly contributes to the revitalization of the area. Approximately 4,200 students live in campus housing – and many others in private residential housing – within or adjacent to the Sweet Auburn or Old Fourth Ward neighborhoods.

Significant redevelopment efforts have been and are currently underway in the historic neighborhood. In early 2013 The National Trust for Historic Preservation developed a revitalization plan for the Sweet Auburn community as part of its Main Street Program. The Main Street plan provides short-term recommendations focused on the beautification of streetscapes and building facades, and longer-term

recommendations centered on attracting and establishing new development to the area.

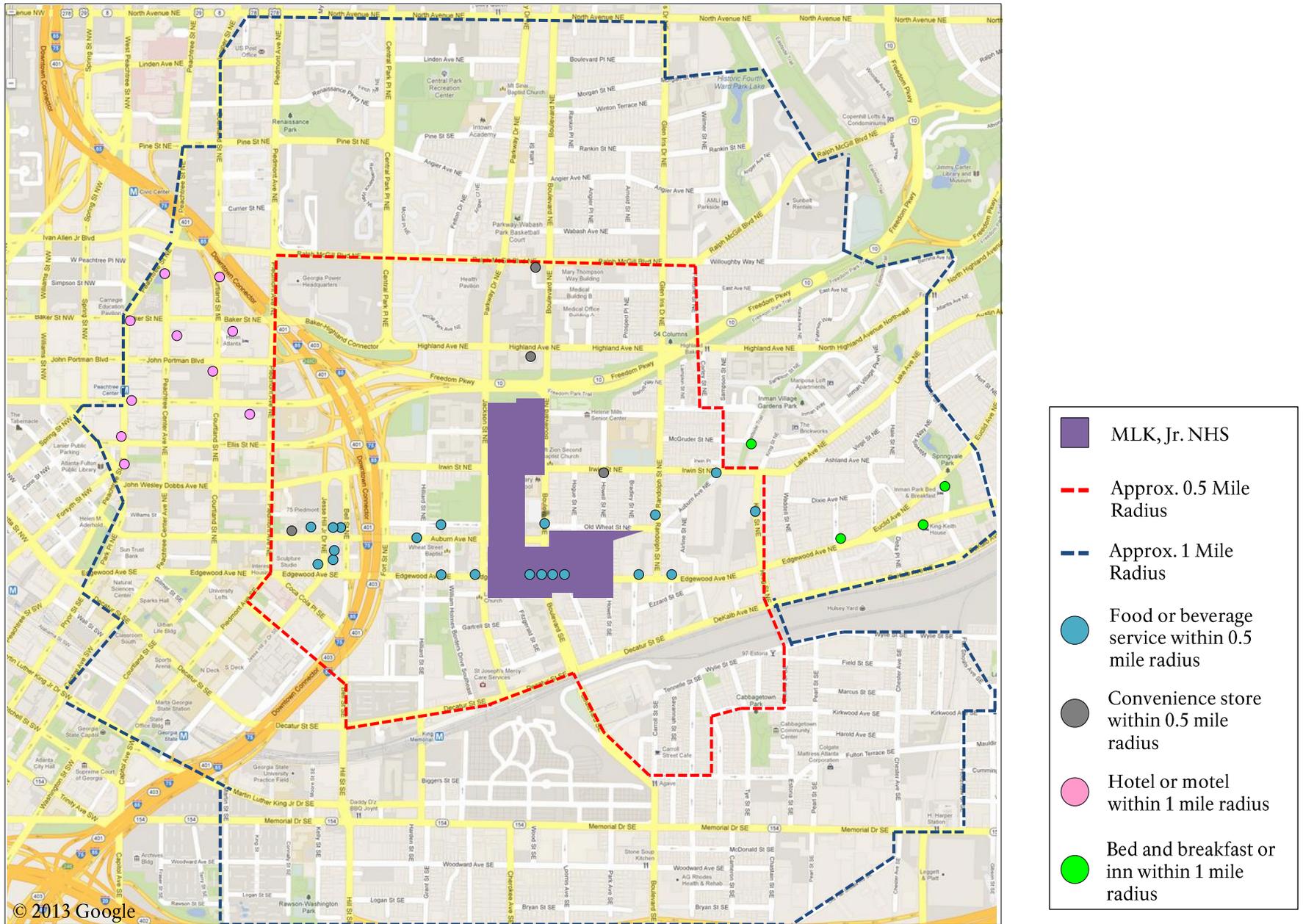
Two other notable projects include the Atlanta Streetcar and the Atlanta BeltLine. The Atlanta Streetcar project, with an anticipated completion date of spring 2014, will connect riders between Centennial Olympic Park and The King Center via Edgewood and Auburn Ave. Similarly, the Atlanta BeltLine project aims to increase visitor and resident access to different city neighborhoods. The project, partially complete in some areas, redevelops a historic rail corridor that borders the city into a comprehensive network of public parks, multi-use trails, and transit. The Atlanta BeltLine plans to border the eastern boundary of the Fourth Ward neighborhood.

Due to Sweet Auburn's current trajectory of revitalization, commercial services at Martin Luther King, Jr. NHS have the opportunity to not only enhance the visitor experience, but to also assist in restoring some of the vibrancy, culture, and the historic environment of the once thriving neighborhood. At the same time, the park recognizes the potential for external parties to provide a variety of services outside or adjacent to park boundaries in the coming years, meeting current visitor demands. Given the anticipated economic and commercial growth of the Sweet Auburn and Old Fourth Ward communities, certain activities and services may not be deemed "necessary" for the park to provide to visitors in future years, and should be reevaluated as time progresses.

Figure 10 displays local accommodations, shopping, and food services in the vicinity of the park – some of which are inholdings within park boundaries. A number of restaurants and dining options exist along Edgewood Ave, two to three blocks from the center of the park, and even more beyond a 0.5 mile radius of the park. However, some of these services are difficult for visitors to access because they are located on the other side of a major freeway. Downtown Atlanta features numerous lodging and hotel accommodation options. However, the vast majority resides beyond a 0.5 mile radius from the park and cluster around the Peachtree Center Station. (See Appendix C for a directory of local accommodations, dining options, and convenience stores).

3: "The Economic Impact of Tourism in Georgia," U.S. Travel Association, August 2012. Available at <http://www.georgia.org/industries/Tourism/Pages/tourism-industry-research.aspx>  
4: "America's Most Visited Cities," [www.forbes.com](http://www.forbes.com), [http://www.forbes.com/2010/04/28/tourism-new-york-lifestyle-travel-las-vegas-cities\\_slide\\_5.html](http://www.forbes.com/2010/04/28/tourism-new-york-lifestyle-travel-las-vegas-cities_slide_5.html)

Figure 10: Aerial Map Illustrating Nearby Services and Accommodations



# Necessary and Appropriate Criteria

The National Park Service Concessions Management Improvement Act of 1998 describes that “the development of public accommodations, facilities, and services in units of the National Park System shall be limited to those accommodations, facilities, and services that are necessary and appropriate for public use and enjoyment of the unit of the National Park System in which they are located.” Necessary and appropriate criteria help parks determine which commercial services can enhance the visitor experience while not negatively impacting the park and its ability to carry out its mission. They allow a park to easily identify which services can be considered for a Commercial Use Authorization, concession contract, or lease.

Appropriate criteria help to answer the question, “*Can the park authorize this service without compromising the reason it is a unit of the National Park System?*” These criteria provide insight into the critical components of the park and visitor service that cannot be compromised and they describe the potential negative impacts of commercial services that must to be prevented. All commercial services – whether a Commercial Use Authorization, concession contract, or lease – must meet all appropriate criteria to operate in the park.

Necessary criteria help to answer the question, “*Why is this service important for the park?*” These criteria describe how a commercial service could enhance the visitor experience and further the goals and mission of the park. Necessary criteria are unique to NPS concession contracts – while CUAs do not need to meet any necessary criteria, concession contracts must meet at least one necessary criterion. Leases must meet all appropriate criteria, but should not be used for services that are subject to authorization as a CUA or concession contract.

Martin Luther King, Jr. National Historic Site identified the following necessary and appropriate criteria for commercial service operations at the park:

## Appropriate Criteria:

*(Commercial services must meet all appropriate criteria)*

1. Services do not conflict with or diminish the purposes for which the Martin Luther King, Jr. National Historic Site was established – to preserve and interpret the life of Dr. Martin Luther King, Jr. and his contribution to the modern American Civil Rights Movement.
2. Services do not compromise public health, safety, or well-being.
  - Services carry appropriate insurance
  - Services meet all federal, state, and local health and safety codes and regulations
  - Services do not promote dangerous recreational activities
  - Services provide alcohol responsibly and in adherence with local and state laws
3. Services do not unduly conflict with other authorized park uses, such as interpretive and educational programming.
4. Services do not monopolize recreational opportunities or limit historic landscapes and buildings at the expense of the general public.

## Necessary Criteria:

*(Concessions must meet at least one necessary criterion; Commercial Use Authorizations and leases may be issued without meeting any necessary criteria)*

1. Facilitates understanding and appreciation of the park’s mission and values by educating visitors about the lifetime achievements of Dr. and Mrs. Martin Luther King, Jr., the modern American Civil Rights movement, and/or the historic Sweet Auburn community.
2. Provides a basic visitor service that is not available within a reasonable walking distance from the park. Basic services must meet immediate visitor comfort and convenience needs.

# Evaluation of Commercial Service Opportunities

Throughout the development of the Commercial Services Strategy, the park sought input from a variety of stakeholders on ideal commercial service and business opportunities for the park. These stakeholders included the park’s general management team and long-term staff members. Additionally, they consisted of nineteen partner representatives and thirty-four visitors who participated in focus groups conducted as part of a Visitor Services Project effort led by the University of Idaho in November 2012. (Please see Appendix D for the list of attendees). Lastly, a few select partners provided additional input during follow-up interviews conducted by the Business Management Group. Across these stakeholder meetings and interviews, participants discussed preferred commercial services for Martin Luther King, Jr. NHS and the benefits and potential challenges associated with providing these services to the public. The following themes emerged from the stakeholder feedback:

## *Stakeholder Themes*

Despite the urban setting and relatively close proximity to amenities, park visitors frequently request a variety of commercial services

While some restaurants and lodging options can be found within a half-mile to a mile radius of the park, visitors are typically non-local and lack information on their surroundings. They frequently request food and beverage services in the immediate vicinity of the park. Few venture out to Edgewood Ave. As one visitor described, “We were trying to get lunch and it turned out pretty difficult to even find somewhere to eat.” Some also commented that they would like lodging closer to the park as well as transportation services.

Commercial services can support the revitalization of the Sweet Auburn neighborhood

Originally a flourishing community filled with attractive storefronts and bustling activity, the Sweet Auburn neighborhood has deteriorated in the face of increased crime, out-migration, and de-investment. Visitors often feel disappointed to see the Sweet Auburn neighborhood so dramatically different from their expectations. In recent years the community has

begun a slow process of revitalization – commercial services offered by the park may help stimulate the area and return the neighborhood to its original vibrancy. Stakeholders enthusiastically describe the significant momentum of growth within the community and the great opportunity presented to the park at this time.

If possible, commercial services should prioritize the use of local, small businesses

Given the park’s location in an underserved community, stakeholders commented on their desire to see commercial services at the park utilize local entrepreneurs and small businesses. Park stakeholders view commercial services as an opportunity to enhance the visitor experience while also improving the economic status of local residents.

Structures utilized by commercial services should maintain the integrity of the historic Sweet Auburn and Old Fourth Ward communities.

Park stakeholders emphasized the importance of maintaining the historic integrity of the Sweet Auburn and Old Fourth Ward neighborhoods. Any storefronts should ideally feel and look like stores and buildings during the 1929-1941 era. Park visitors and stakeholders caution the over-commercialization of the area. One visitor commented that “We don’t want the place to become Disney World-ish” and another emphasized, “No McDonalds.”



A row of Queen Anne-styled homes in the residential block of Martin Luther King, Jr.'s Birth

### *Potential Commercial Service Opportunities*

When asked to provide feedback on commercial service opportunities at the park, stakeholders described a variety of ideas. Almost all exhibited strong support for bringing new activities and services to the park. The full list of commercial service ideas generated by these discussions, regardless of feasibility or appropriateness, is provided below:

#### **Food and Beverage**

Despite the availability of food and dining options within a half-mile radius of the park, visitors and stakeholders most frequently described wanting food services at the park. Comments pointed to an opportunity for light food, authentic Southern cuisine, and healthy dining. Specific food and beverage services mentioned include:

- Light food and beverage vendors
- Café, tea room, or soda shop; potentially with an outdoor patio space
- Ice cream store or stand
- Full-service restaurant. Requested restaurant types included authentic Southern cuisine or healthy dining
- Cafeteria with a large seating area
- Vending machines
- Special event food and beverage vendors

#### **Lodging**

A variety of accommodations currently exist in downtown Atlanta, with the closest major hotels located a mile from the park. However, park staff and stakeholders commented that a small bed and breakfast or inn would be an ideal use of one of the park's recently renovated, and currently vacant, historic buildings. Specifically, the park could provide an authentic early-to-mid twentieth century experience unparalleled by nearby lodging through the utilization of historic structures situated only a few steps away from Dr. King's Birth Home. While many stakeholders conveyed strong enthusiasm with the idea of a historic inn or B&B, some described concern with its financial sustainability, especially given the limited room capacity of these facilities.

#### **Retail**

In general, stakeholders provided positive feedback on the historic site's bookstore and recommended bringing additional retail services to the park. Small vendors could sell general products and sundries to visitors (e.g., water, snacks, film, sunscreen, hats, etc.). Multiple stakeholders also mentioned souvenirs related to the park and Dr. King as a potential commercial service opportunity. These retail services could include:

- Historic drug store or convenience store
- Souvenir shop
- Mobile, seasonal, or special event souvenir vendors



The bookstore at the Martin Luther King, Jr., National Historic Site, operated by Eastern National.

#### **Tours**

Existing private tours (including bus, bike, and Segway tours) already traverse the park outside of an authorized park permit program. In addition to professionalizing and ensuring the high quality of these services, stakeholders described the opportunity for increased interpretive and educational tours at the park, potentially coupled with other historic sites across the Atlanta. Possible tour services:

- Guided walking tours of the larger Sweet Auburn community
- Trolley, bus, and bike tours
- Tour to a variety of historic sites across Atlanta (e.g., African American heritage tour)

## Transportation

Visitors typically require automotive transportation to access the park. For those visitors utilizing public transportation, the location of the King Memorial Metropolitan Atlanta Rapid Transit Authority (MARTA) station requires a fifteen minute walk through what some stakeholders described as a “potentially unsafe neighborhood.” Once inside the park, the majority of visitors tour the site on foot. Some visitors commented that they would like enhanced transportation options, especially during the hot summer months and commented that the distance between park attractions requires too much walking. Ideas explored:

- Bike rentals or bike share
- Shuttle service from MARTA
- Shuttle service with tour from parking lot to main park sites
- Shuttle service from hotel
- Additional parking lot (for fee)

## Other Commercial Services Ideas

Park staff, partners, and visitors provided a variety of other commercial service opportunities:

- Photo booth or green screen
- Conference room or event space for large groups
- Theater showing historic films or documentaries related to Dr. King
- Outdoor movies
- Stroller/wheelchair rental
- Lockers or storage for luggage and other items
- Bowling alley or other recreational games
- Bank/ATM service
- Park/community garden

This list of potential commercial service opportunities has been mapped against the park’s necessary and appropriate criteria on the following pages.



Martin Luther King, Jr. Visitor Center

Figure 11: Potential Commercial Services

X: Commercial service would meet the criteria

\*: Commercial service would meet the criteria if it provided educational and/or interpretive value to visitors

Potential Commercial Service	Appropriate Criteria				Necessary Criteria		Possible Authorization		
	1. Services do not conflict or diminish the purpose of MLK, JR, NHS was established...	2. Services do not compromise public health, safety, or well-being...	3. Services do not unduly conflict with other authorized park uses...	4. Services do not monopolize recreational opportunities ...	1. Facilitates understanding and appreciation of the park...	2. Provides a basic visitor service...	CUA <sup>5</sup>	Concession Contract	Lease <sup>6</sup>
<b>FOOD AND BEVERAGE</b>									
Light food and beverage stand	X	X	X	X		X	YES, if gross receipts <\$25K	YES	NO
Full service restaurant	X	X	X	X		**	NO	NO	YES
Café/tea room/soda shop/ice cream shop	X	X	X	X		**	NO	NO	YES
Cafeteria	X	X	X	X		**	NO	NO	YES
Vending machines	X	X	X	X		X	YES	YES	NO
Special event vendors	X	X	X	X		X	YES, if gross receipts <\$25K	YES	NO
<b>LODGING</b>									
Bed & Breakfast	X	X	X	X	*		NO	MAYBE	YES
<b>RETAIL</b>									
Historic drug store	X	X	X	X	*		NO	MAYBE	YES
Souvenir shop	X	X	X	X	*		NO	MAYBE	YES
Mobile vendors	X	X	X	X	*		YES, if gross receipts <\$25K	MAYBE	NO

\*\* = Full service restaurant and cafeteria are not treated as providing a “basic visitor service” due to the scale of the operation. Given the availability of restaurants in the vicinity, only light food and beverages services are considered “necessary” by the park. A café/tea room/ice cream shop would provide a novelty service to visitors, and is also not considered a “basic” service.

5 = The park assumes that larger scale operations (stores, restaurants) will generate more than \$25,000 in annual gross receipts and would therefore not qualify for an in-park CUA.

6 = While some services may not be open to all visitors (e.g., bed and breakfast), they are considered “appropriate” because they would increase, not limit, access to historic structures that are currently vacant or underutilized.

X: Commercial service would meet the criteria

\*: Commercial service would meet the criteria if it provided educational and/or interpretive value to visitors

Potential Commercial Service	Appropriate Criteria				Necessary Criteria		Possible Authorization		
	1. Services do not conflict or diminish the purpose of MLK, JR, NHS was established...	2. Services do not compromise public health, safety, or well-being...	3. Services do not unduly conflict with other authorized park uses...	4. Services do not monopolize recreational opportunities ...	1. Facilitates understanding and appreciation of the park...	2. Provides a basic visitor service...	CUA <sup>5</sup>	Concession Contract	Lease <sup>6</sup>
<b>TOURS</b>									
Guided walking tours	X	X	X	X	X		YES	YES	NO
Trolley/bus/bike tours	X	X	X	X	X		YES	YES	NO
<b>TRANSPORTATION</b>									
Bike rentals	X	X	X	X		X	YES, if gross receipts <\$25K	YES	NO
Shuttle service	X	X	X	X		X	YES	YES	NO
Parking lot	X	X	X	X			NO	NO	MAYBE
<b>OTHER</b>									
Photo booth	X	X	X	X			YES	NO	NO
Conference/event space	X	X	X	X	*		NO	MAYBE	YES
Theater	X	X	X	X	*		NO	MAYBE	MAYBE
Outdoor movies	X	X	X	X	*		YES, if gross receipts <\$25K	MAYBE	MAYBE
Stroller/wheelchair rental	X	X	X	X			YES, if gross receipts <\$25K	NO	NO
Lockers	X	X	X	X			YES, if gross receipts <\$25K	NO	NO
Bowling alley/games	X	X	X	X			NO	NO	YES
ATM	X	X	X	X			YES, if gross receipts <\$25K	NO	NO
Park/community garden	X	X	X	X			YES	NO	NO

5 = The park assumes that larger scale operations (stores, restaurants) will generate more than \$25,000 in annual gross receipts and would therefore not qualify for an in-park CUA.

6 = While some services may not be open to all visitors (e.g., bed and breakfast), they are considered “appropriate” because they would increase, not limit, access to historic structures that are currently vacant or underutilized.

# High Priority Services and Locations

Among the list of identified commercial service opportunities deemed appropriate, the Martin Luther King, Jr. NHS management team prioritized the most important commercial services for the park to actively pursue at this time as well as preferred park locations and the ideal authorization for each. This management team meeting occurred on March 14, 2013 and determined the following high priority services:

Figure 12: Priority Commercial Services

Commercial Service	Potentials Locations	Preferred Authorization
<b>HIGH PRIORITY</b>		
Light food and beverage vendors	<ul style="list-style-type: none"> <li>• Parking lot</li> <li>• Visitor Center</li> <li>• Along Irwin St.</li> </ul>	<ul style="list-style-type: none"> <li>• In-park CUA</li> <li>• Potentially a Category II concession contract if annual gross receipts per vendor exceed \$25,000</li> </ul>
Bed & breakfast or small inn	<ul style="list-style-type: none"> <li>• 491 Auburn Ave.</li> <li>• 493 A, B, and C Auburn Ave.</li> <li>• 530 Auburn Ave.</li> </ul>	<ul style="list-style-type: none"> <li>• Historic property lease</li> </ul>
Guided walking tours (to sites within and outside of park boundaries)	<ul style="list-style-type: none"> <li>• Outside park</li> <li>• Visitor Center</li> </ul>	<ul style="list-style-type: none"> <li>• Out-of-park CUA</li> <li>• In-park CUA for walking tours that begin at the Visitor Center (assumes gross receipts will not exceed \$25,000)</li> </ul>
Trolley or bus tours (to sites within and outside of park boundaries)	<ul style="list-style-type: none"> <li>• Outside park</li> <li>• Visitor Center</li> </ul>	<ul style="list-style-type: none"> <li>• Out-of-park CUA</li> <li>• Category II concession contract for guided transportation tours that begin at the Visitor Center (assumes gross receipts will exceed \$25,000)</li> </ul>
Bike rentals	<ul style="list-style-type: none"> <li>• Parking lot</li> </ul>	<ul style="list-style-type: none"> <li>• In-park CUA</li> </ul>
Outdoor movies	<ul style="list-style-type: none"> <li>• Parking lot</li> <li>• Vacant lot on Edgewood</li> </ul>	<ul style="list-style-type: none"> <li>• In-park CUA</li> </ul>
<b>MEDIUM PRIORITY</b>		
Café/tea room or ice cream shop	<ul style="list-style-type: none"> <li>• 491 Auburn Ave.</li> <li>• 497 Auburn Ave. (Bookstore)</li> <li>• 530 Auburn Ave.</li> <li>• 445 Edgewood</li> </ul>	<ul style="list-style-type: none"> <li>• Historic property lease</li> <li>• Partnership with The King Center and/or Eastern National</li> </ul>
Special event food and beverage vendors	<ul style="list-style-type: none"> <li>• Parking lot</li> <li>• Along Irwin St.</li> </ul>	<ul style="list-style-type: none"> <li>• In-park CUA</li> </ul>
Conference room	<ul style="list-style-type: none"> <li>• The King Center and/or Ebenezer Baptist Church</li> </ul>	<ul style="list-style-type: none"> <li>• N/A - Partnership with The King Center and/or Ebenezer Baptist Church</li> </ul>

# Implementation Plan

To successfully implement the identified high priority services, Martin Luther King, Jr. National Historic Site should pursue the actions identified on the following pages. While these implementation steps are organized by commercial service type, the park should streamline the implementation process by pursuing similar authorizations simultaneously. For instance, out-of-park guided walking tours and bus trolley tours will involve the same implementation steps, as will establishing a lease for a bed and breakfast and small café or tea room. Figure 13 organizes implementation steps by authorization type. The park should pursue an integrated approach to executing its commercial services priorities, ensuring that business services contribute to a comprehensive visitor experience rather than feeling disjointed or disconnected to the park.

## High Priority Commercial Services

### **Light food and beverage vendors**

*Authorization:* Begin Year 1 with in-park CUAs, exploring a concession contract in subsequent years only if annual gross receipts exceed \$25,000

*Potential Locations:* Visitor parking lot, Visitor Center, Along Irwin St.

*Actions to Implement:*

- Designate specific areas in the visitor parking lot, Visitor Center, and along Irwin Street that may be suitable for limited mobile food and beverage vendors
- Develop CUA permit guidance, including CUA conditions and rules, required insurance and documentation, and permit fee for application and cost recovery.
- Issue a solicitation for limited food and beverage service provider. Work with local development organizations, such as Central Atlanta Progress and Atlanta Downtown Improvement District, to identify interested small businesses in the community.
- Select best proposal(s) and issue CUA(s) as space allows. (Refer to Appendix F for a sample Commercial Use Authorization permit)

### **Bed & breakfast or small inn**

*Authorization:* Historic property lease

The park should offer all prioritized lease operations – bed& breakfast, inn, café, team room, or ice cream shop – as potential uses for a historic lease, with the opportunity for one business to lease multiple facilities together as one non-contiguous operation, or for multiple businesses to lease individual units separately.

*Potential Locations:* 491 Auburn Ave., 493 A, B, and C Auburn Ave., and 530 Auburn Ave.

*Actions to Implement:*

- Conduct a basic interior clean-up of each facility
- Procure lease appraisals to determine the fair market rent of each unit, and get DOI Office of Valuation Services approval
- Identify appropriate notification document and develop solicitation. Notification types include:
  - Request for proposal: Award of lease based on a variety of selection criteria, in addition to price
  - Request for bid: Award of lease based on rent price alone
- Determine lease terms. Rehabilitation of historic, income-producing buildings may come with a 20% income tax credit. A 10% tax credit is available for the rehabilitation of non-historic buildings placed in service before 1936.<sup>7</sup> If a lease agreement requires or allows the lessee to maintain, repair, rehabilitate, restore, or build upon historic property, the work must be done in accordance with the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, section 106 of the National Historic Preservation Act, Section 7(c) of the park's enabling legislation, and other relevant NPS policies, guidelines, and standards.
- Selection of the best lessee/developer

7: More information can be found here: <http://www.nps.gov/tps/tax-incentives/taxdocs/about-tax-incentives-2012.pdf>

**Guided walking tours** (to sites within and outside of park boundaries)

*Authorization:* Out-of-park CUA, in-park CUA for walking tours that begin at the Visitor Center (assuming gross receipts will not exceed \$25,000)

*Potential Locations:* Outside the park, Visitor Center

*Actions to Implement:*

- Develop CUA permit guidance, including CUA conditions and rules, required insurance and documentation, and permit fee for application and cost recovery
- Out-of-park CUAs: Work with city permitting office to notify any current and future tour providers crossing park boundaries about the park's new CUA permit and fee requirements.
- In-park CUA:
  - Designate area within Visitor Center for tour staff to operate and manage business transactions
  - Issue a solicitation for guided walking tour operation. Work with local development organizations, such as Central Atlanta Progress and Atlanta Downtown Improvement District, to identify interested small businesses in the community.
  - Select best proposal(s) and issue CUA(s) as space allows

**Trolley or bus tours** (to sites within and outside of park boundaries)

*Authorization:* Out-of-park CUA; Category II concession contract for guided transportation tours that begin at the Visitor Center (assuming gross receipts will exceed \$25,000)

*Potential Locations:* Outside the park; Visitor Center

*Actions to Implement:*

- Out-of-park CUAs:
  - Develop CUA permit guidance, including CUA conditions and rules, required insurance and documentation, and permit fee for application and cost recovery
  - Work with city permitting office to notify any current and future tour providers crossing park boundaries about the park's new CUA permit and fee requirements.

- Category II concession contract:
  - Determine if the park can and should provide in-park land for trolley or bus parking. Otherwise, designate area within Visitor Center for tour staff to operate and manage business transactions with tour vehicles located off-site
  - Complete financial feasibility and market demand analysis to determine viability of an in-house bus/trolley tour service
  - Determine desired conditions to include in concessions contract
  - Develop prospectus and solicit contract

**Bike sharing and rentals**

*Authorization:* In-park CUA. The park could pursue either a bike rental service or partner with a bike sharing company such as viaCycle@gt (<https://gt.viacycle.com>) that operates multiple bike sharing locations throughout Atlanta.

*Potential Locations:* Parking lot, and potentially other locations throughout the park for bike parking

*Actions to Implement:*

- Designate specific areas in the visitor parking lot that may be suitable for bike rentals and racks. If access to bicycle racks throughout the park is currently insufficient, determine the visitor impact of installing new racks or creating a designated bike parking area.
- Develop CUA permit guidance, including CUA conditions and rules, required insurance and documentation, and permit fee for application and cost recovery
- Issue a solicitation for a bike rental or bike sharing service. Work with local development organizations, such as Central Atlanta Progress and Atlanta Downtown Improvement District, to identify interested small businesses in the community.
- Select best proposal(s) and issue CUA(s) as space allows

**Outdoor movies**

*Authorization:* In-park CUA

*Potential Locations:* Parking lot; Vacant lot on Edgewood

*Actions to Implement:*

- Continue existing efforts to provide outdoor film opportunities

to visitors and the public.

- Develop CUA permit guidance, including CUA conditions and rules, required insurance and documentation, and permit fee for application and cost recovery and issue a solicitation for an outdoor movie provider

### Medium Priority Commercial Services

#### **Café/tea room or ice cream shop**

*Authorization:* Historic property lease, potentially a partnership with The King Center or Eastern National

*Potential Locations:* 491 Auburn Ave., 497 Auburn Ave. (Bookstore), 530 Auburn Ave., 445 Edgewood

*Actions to Implement:*

- Historic leases – see actions listed under “bed & breakfast or small inn.” The park could list a café/tea room/ice cream shop operation as a potential use for a historic lease.
- Partnerships – work with Eastern National and/or The King Center to determine the feasibility of providing these services directly to visitors through the park bookstore (497 Auburn Ave.) or at The King Center.

#### **Special event food and beverage vendors**

*Authorization:* In-park CUAs

*Potential Locations:* Visitor parking lot, Along Irwin St.

*Actions to Implement:* See actions listed under “Light food and beverage vendors.” In addition to these seasonal and year-round vendors, the park may want to solicit additional permits for limited food operations during high visitation weekends, such as King Week.

#### **Conference room**

*Authorization:* N/A - Partnership

*Potential Locations:* The King Center and/or Ebenezer Baptist Church

*Actions to Implement:* Work with The King Center and/or Ebenezer Baptist Church to determine if, and how, park visitors could utilize existing conference spaces at each organization.

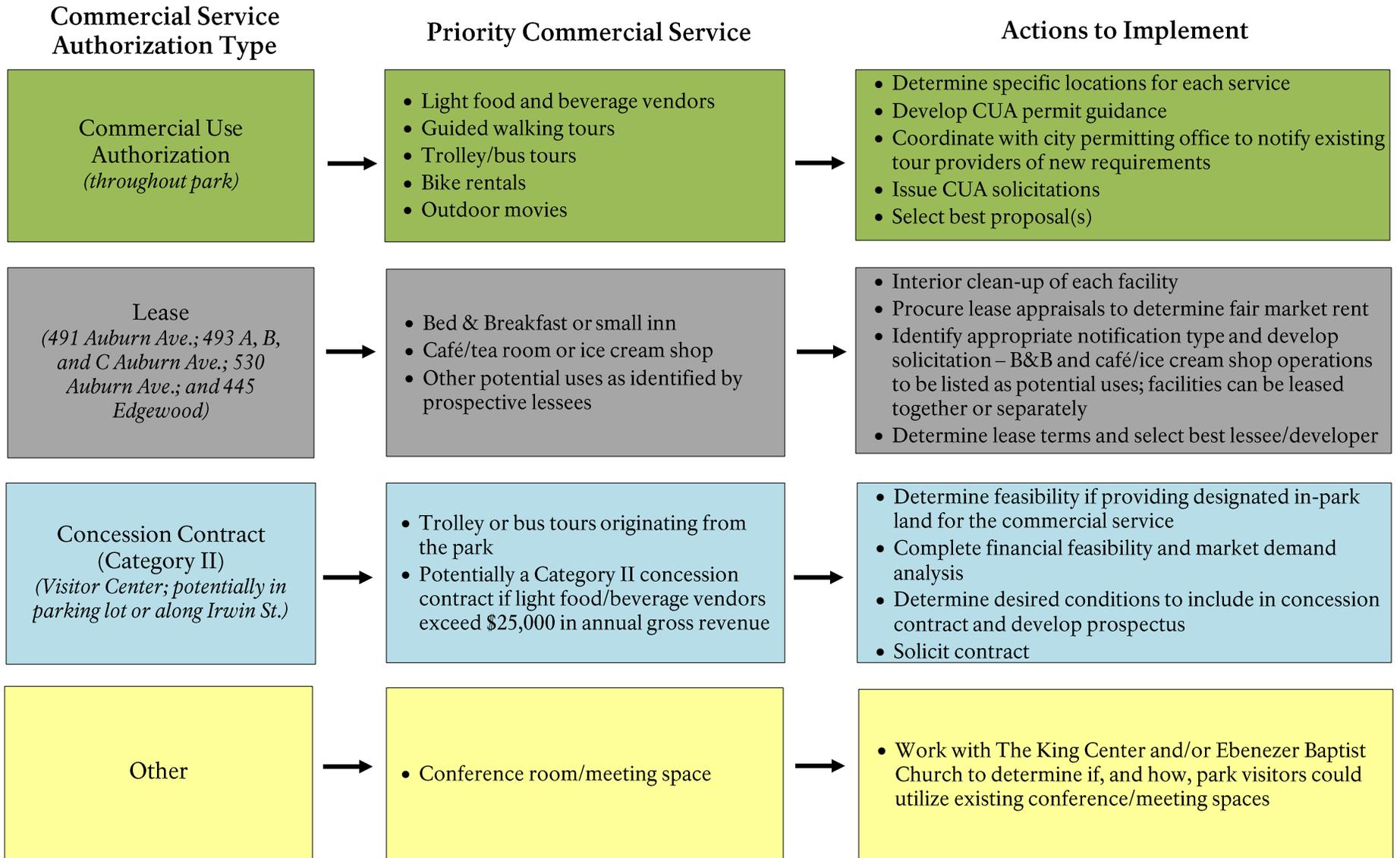
### Facility, Maintenance, and Staffing Considerations

Effectively implementing the park’s Commercial Services Strategy will require an up-front investment in staff time and resources. However, if managed well, commercial service fees – including cost recovery, franchise fees, and rental payments – should not only fully cover the costs expended to oversee the program, but actively provide revenue to the park, in addition to enhancing the visitor experience and maintaining historic facilities that may otherwise sit vacant.

Depending on the level of commercial services implemented, Martin Luther King, Jr. NHS will require up to 0.5 FTE (GS-7) to oversee commercial service activities in the park. This includes managing, monitoring and collecting fees from CUAs and potentially overseeing prospectus development and the selection of a small-scale category II concessioner. The staff member(s) assigned to manage commercial services at the park will act as the primary liaison for both Commercial Use Authorizations and concession contracts, in collaboration with law enforcement staff.

The leasing of additional historic buildings, such as 491 Auburn Ave., 493 A, B, and C Auburn Ave., and 530 Auburn Ave., should fall under the purview of the park’s current residential leasing program and associated staff that manage the operation. Maintenance staff will also be involved initially in cleaning out the interior of each facility to a condition appropriate for a lease appraisal and solicitation. Any facility and maintenance improvements to historic building can be incorporated into the lease agreement between the lessee and the park. These improvements will need to be assessed for compliance with the Secretary of the Interior’s Standards and Guidelines for Archeology and Historic Preservation.

Figure 13: Implementation Steps Organized by Authorization Type



# Key Factors That Could Affect Achievement of the Commercial Services Goals

A variety of factors could influence the park's achievement of its commercial service goals, especially given the park's dynamic urban environment.

## *Local Crime and Safety*

Historically, the Old Fourth Ward area has experienced significant crime, and illegal activity. However, the neighborhood has undergone a period of revitalization, with new development and commercialization emerging in the area over the past two decades. Despite these trends in economic growth, safety remains a concern of local residents and visitors. When asked to describe potential challenges at the park, some stakeholders commented that the prevalence of crime in the area might deter potential commercial services, such as a bed and breakfast operation or inn. As the park considers providing commercial services to visitors, crime and illegal activity will need to be limited and the safety of visitors maintained.

## *Zoning Policies*

Existing zoning policies originating from 1980s curb commercial development at the park, with specific limits on the construction of bed and breakfasts and playgrounds. Any changes to historic structures and landscapes in the park must comply with City of Atlanta zoning policies. Current efforts are in process to update these zoning laws by the end of 2013. Implementation of a bed and breakfast lease will depend on the successful revision of these zoning policies.

## *Compliance with Historic Structure Standards*

Many of the park's facilities exhibit early-twentieth century architecture in Atlanta and are listed in the National Register. The management and operation of historic structures must meet specific standards geared at slowing the deterioration rate of historic material and maintaining the structure's character. Contributing historic structures at the park include 491 Auburn Ave., 493 A, B, and C Auburn Ave., 530 Auburn Ave., and 445 Edgewood Ave., all of which have been identified by park staff as potential locations for future commercial services. Therefore, compliance with historic structure standards may limit development

flexibility and potentially deter some businesses from operating within one of the identified park facilities.

That said, the leasing of historic structures is associated with a number of business incentives, including a 39 ½ year lease term and a federal income tax credit up to 20% for any restoration completed by the lessee (for income producing properties only).

## *Competition and Market Demand*

The success of any commercial service depends on the entrepreneurial drive of interested parties, and the willingness for businesses to seek out new service opportunities. Understanding the local business environment will be critical to the success of commercial services within the park. As the Sweet Auburn neighborhood has and continues to experience significant development, business interest in providing services within park boundaries is likely to be very high. The park should continue to remain involved in the many local initiatives taking place in the area.

The park also maintains close relationships with a number of partner organizations, including The King Center and Ebenezer Baptist Church. In future years, these organizations may pursue providing business services to visitors. The park should continue to work closely with its partners to ensure that any commercial services are complementary and appropriate with those of its partners.

## *Transportation and Access*

The Atlanta Streetcar Project has the potential to increase visitor and public access to the Martin Luther King, Jr. NHS. Weekday ridership is projected to be around 2,600.<sup>8</sup> If successful, this alternative form of transportation may support the park's commercial service goals by connecting visitors from downtown attractions directly to the historic site via Edgewood Avenue and Auburn Avenue.

8: Interview with Jennifer Ball, Central Atlanta Progress, Vice President, Planning and Economic Development, March 12, 2013.

# Civic Engagement Strategy

Civic engagement plays a critical role in the development of a Commercial Services Strategy. Feedback from partner groups and stakeholders provides insight into the demand for different commercial services at the park and helps identify potential challenges and key levers for successful implementation. During the development of this Commercial Services Strategy, Martin Luther King, Jr. NHS used multiple avenues to engage its stakeholders, including focus groups, phone interviews, and a public open house.

The process began with individual meetings with Martin Luther King, Jr. NHS management and long-term staff members, leading to an enhanced understanding of the park's unique context and specific needs. Concurrently, the park utilized partnership meetings and visitor focus groups scheduled as part of its 2013 Visitor Study, conducted by the University of Idaho, to obtain feedback on commercial service opportunities and challenges. Specifically, these consisted of two park partnership meetings (attended by nineteen partner representatives) and seven visitor focus groups (attended by thirty-four visitors). These meetings occurred during the second week of November, 2012. Attendees of the partnership meetings can be found in Appendix D.

A few select partners were then contacted for more in-depth interviews concerning future plans of the Sweet Auburn and Old Fourth Ward neighborhoods and their opinions of commercial service opportunities at the park. Interviewees included representatives of the Historic District Development Corporation, Ebenezer Baptist Church, Atlanta Convention and Visitors Bureau, Central Atlanta Progress, and the Chief of Staff to Councilman Kwanza Hall, who represents District 2.

Next, a meeting took place on March 14<sup>th</sup>, 2013 with the park's management team to finalize the park's necessary and appropriate criteria and discuss the commercial service opportunities identified from stakeholder outreach efforts. During this meeting, park management also determined its high priority commercial services for the next three to five years, as well as the most appropriate authorization and location for each service. Regional feedback on the park's proposed services was also provided in June, 2013.

On **DATE** Martin Luther King, Jr. NHS distributed a press release to local media, VIPs, and park partners announcing a public open house to be held at the park on **DATE**. This meeting presented an overview of the commercial services strategy project and key findings. Those present were able to provide input and ask questions on how the strategy could impact their communities or constituents. Feedback from this meeting was then incorporated into the final Commercial Services Strategy. Please see **Appendix E** for a listing of those who attended.

As Martin Luther King, Jr. NHS begins to implement the high priority commercial services identified in this report, it should continue to seek on-going feedback from its partners and local organizations involved in the Sweet Auburn and Old Fourth Ward communities. Additionally, the park should annually review its Visitor Survey Card reports to assess visitor satisfaction with commercial services offered at the park

## Conclusion

Martin Luther King, Jr. National Historic Site is excited at the opportunity to provide commercial services to park visitors and the community. By prioritizing only those services and activities that meet the park's necessary and appropriate criteria and pursuing the most effective authorization instruments, the park believes its commercial services will enhance the visitor experience, actively educated visitors on the importance of the life and work of Dr. King, and utilize historic buildings that would otherwise sit vacant. Additionally, the park recognizes that commercial services may support the growing revitalization of the historic Sweet Auburn and Old Fourth Ward, helping to re-establish the renowned neighborhoods as a flourishing visitor destinations and places of residence.



Photo courtesy of magazineuse.com

# Appendix A: Commercial Services Authorization Instruments

The following reference section identifies the commercial services and related instruments available to the NPS, and their respective timetables, definitions, constraints, methodologies, and policies.

## *Concession Contracts*

All concession operations must be approved and authorized by the National Park Service under delegation of authority through the preparation of a prospectus (solicitation of offers), NPS review of proposals, selection of the best offer, and final contract execution. The procedures are detailed in 36 CFR, 51.4.

Concession contracts are legal agreements between the Secretary of the Interior (or authorized delegate) and a concessioner that requires the concessioner to provide certain visitor services in the park, such as food service or retail. Other services may be authorized but not required.

The 1998 concessions law stipulates three types of concession contracts, Category I, II and III. Under the terms and conditions of a concession contract, the Secretary has the authority to assign land and government improvements (facilities) to the concessioner for the conduct of its operations. A Category I contract allows a concessioner to spend capital to acquire facilities from a previous concessioner, make improvements to an existing facility or build a new facility. When any of these occur they acquire a leasehold surrender interest in the facility until the interest is depreciated, bought out by the government, or acquired by a new concessioner. Category II concession contracts have land/facility assignments but the concessioner may not acquire any leasehold surrender interest. Category III concession contracts are for operations without any land/facility assignments or leasehold surrender interest. By law, all concession contracts are issued by competitive bid. The typical term for a contract is 5 to 10 years although under certain financial situations where a large capital investment is involved a 20-year term can be authorized with specific approval from the NPS director.

Contracts authorized under the previous laws gave concessioners certain rights. New contracts do not include a preferential right of renewal except for outfitter and guide services or operators with projected annual gross receipts of less than \$500,000. Concessioners are no longer

given a preferential right of refusal for new or similar services (a virtual monopoly). Rather, the intent of the current law is to encourage competition.

Concession contracts contain various detailed exhibits, including operating and maintenance plans. They require care of land and government improvements provided by the NPS to the concessioner. Compliance with the plans is mandatory.

## *Commercial Use Authorizations*

Commercial Use Authorizations (CUA) provide a simple means to authorize suitable commercial services to park visitors. Services must be appropriate to the park unit, but do not have to be necessary, will have incidental use and minimal impact on the park area's resources and must originate and terminate outside the boundaries of the park. The law provides for small CUAs, gross receipts of less than \$25,000, to conduct commercial operations and be assigned an area inside the park. The number of CUAs issued for an activity may not be limited, unless limitations are supported by other approved processes and policies.

The term of the authorization is 1 or 2 years, although 1 year is most common. Authorizations can be renewed contingent upon satisfactory performance, however no preferential right of renewal or similar provisions for renewal may be provided. Authorizations contain operating conditions and/or stipulations and may designate use such as defining routes and number of user days.

Monitoring of all commercial activities is essential to ensure that business operations are conducted in a safe, fair, and reputable manner consistent with the mission of the park. Monitoring is also essential to ensure compliance with resource protection conditions stated in the permit. Where carrying capacities exist in parks to manage use, monitoring ensures compliance.

The National Park Service is authorized by the Cost Recovery Act to collect all costs associated with CUAs. There are three elements to the determination of the dollar amount that can be charged: application, administrative, and monitoring costs. Application costs start with the

request for the use of park resources and end with mailing the application form. Administrative costs start when the completed application form is received and end with the final signing of the permit. Monitoring costs start when the permittee arrives in the park to perform the permitted use and end when the permitted use is over and the permittee leaves the area. Application and administrative costs can be determined using average costs derived from historic records, but monitoring costs has to reflect actual itemized costs.

### *Leases*

The NPS may issue leases for structures that are not necessary for park operations and are not eligible for authorization through a concession contract or CUA. Leased property must be used for an activity and in a manner that is not inconsistent with the purposes established by law for the park. 36 CFR Part 18 (Leasing of Properties in Park Areas) and Director's Order #38 (Real Property Leasing) describe NPS regulatory and policy requirements for the award and management of leases of park area property. The Director may lease any property (except historic land) that meets the following criteria:

- The lease will not result in degradation of the purposes and values of the park area.
- The lease will not deprive the park area of property necessary for appropriate park protection, interpretation, visitor enjoyment, or administration.
- The lease contains such terms and conditions as will ensure that the leased property will be used for an activity and in a manner that are consistent with the purposes established by law for the park area in which the property is located.
- The lease is compatible with NPS programs.
- The lease is for rent at least equal to the fair market value rent of the leased property.
- The proposed activities under the lease are not subject to authorization through a concession contract, commercial use authorization, or similar instrument.
- If the lease includes historic property, the lease will adequately ensure the preservation of the historic property.

In 1982 the NPS established the Historic Leasing Program to lease historic structures and agricultural land to individuals and organizations. The program was designed to spur rehabilitation and reuse of designated

historic structures and federally owned lands. Any proceeds from these leases are to be used to maintain, repair, and preserve historic properties and to defray the costs of administering the leasing program.

### *Cooperating Associations*

Congress authorized cooperating associations in 1946. Their mission is to support park interpretive and scientific activities through proceeds from sales of educational and interpretive materials in a park, which is a commercial activity. They are usually assigned space in a visitor center or other visitor contact facility. Cooperating associations are authorized by a cooperative agreement. They are managed by a servicewide set of criteria and policies, NPS-32.

### *Special Use Permits*

Special events may be authorized under permit by the superintendent subject to the same criteria as other special park uses provided there is a meaningful association between the purpose of the park and the event, and the event contributes to visitor understanding of the significance of the park. A superintendent may approve a request for a special event if it is determined that the event will:

- Not conflict with law or policy
- Not be a derogation of the values and purposes for which the park was established
- Be consistent with the park's enabling legislation
- Not have reasonable potential to cause illness, personal injury, or property damage
- Not unduly interfere with normal park operations, resource protection, or visitor use

The NPS will not permit the staging of special events that are conducted primarily for the material or financial benefit of participants or that involve commercialization, advertising, or publicity by participants. Events for which a separate public admission fee is to be charge, unless the event is directly related to the purposes for which the park was established will not be permitted either.

The NPS can recover costs incurred in administering permits and monitoring the activities it authorizes. It will also establish and collect permit fees authorized by applicable legislation, regulations, and policies.

Special Use Permits are not covered by NPS concession legislation. Separate regulations for the management of Special Use Permits can be found in 36 CFR 1.6. Guidelines for the issuance of Special Use Permits are provided by DO-53. The guidelines include National Park Service policy and instructions regarding Commercial Filming and Photography, Special Events, Rights-of-Way, and Use and Occupancy permits.

#### ***Commercial Film and Photography Permits***

It is the policy of the National Park Service (DO-21) to allow commercial filming and photography when it is consistent with the protection and public enjoyment of park resources. The regulations used to manage commercial filming are contained in 36 CFR 5.5.

The NPS has the authority and responsibility to manage, permit, and/or deny filming projects consistent with the following principles:

- Natural, cultural, wilderness, and recreational resources will be protected
- The activity will not unduly conflict with the public's normal use and enjoyment of a park
- Visitors using cameras and /or recording devices for their own personal use are generally exempt from film permit requirements
- Coverage of breaking news never requires a permit, but it is subject to the imposition of restrictions and conditions necessary to protect park resources and public health and safety, and to prevent derogation of park values
- The NPS will not censor the content of any project, nor require finished film products for review, files, or documentation purposes

Commercial filming programs in parks are usually managed as a special park use with full cost recovery. Applicants reimburse the park for all costs related to meetings, location scouting, development of permit stipulations, and on-site monitoring of film projects. Each film project usually has a unique set of conditions developed to ensure that park resources are protected and that filming activities does not impact other park visitors.

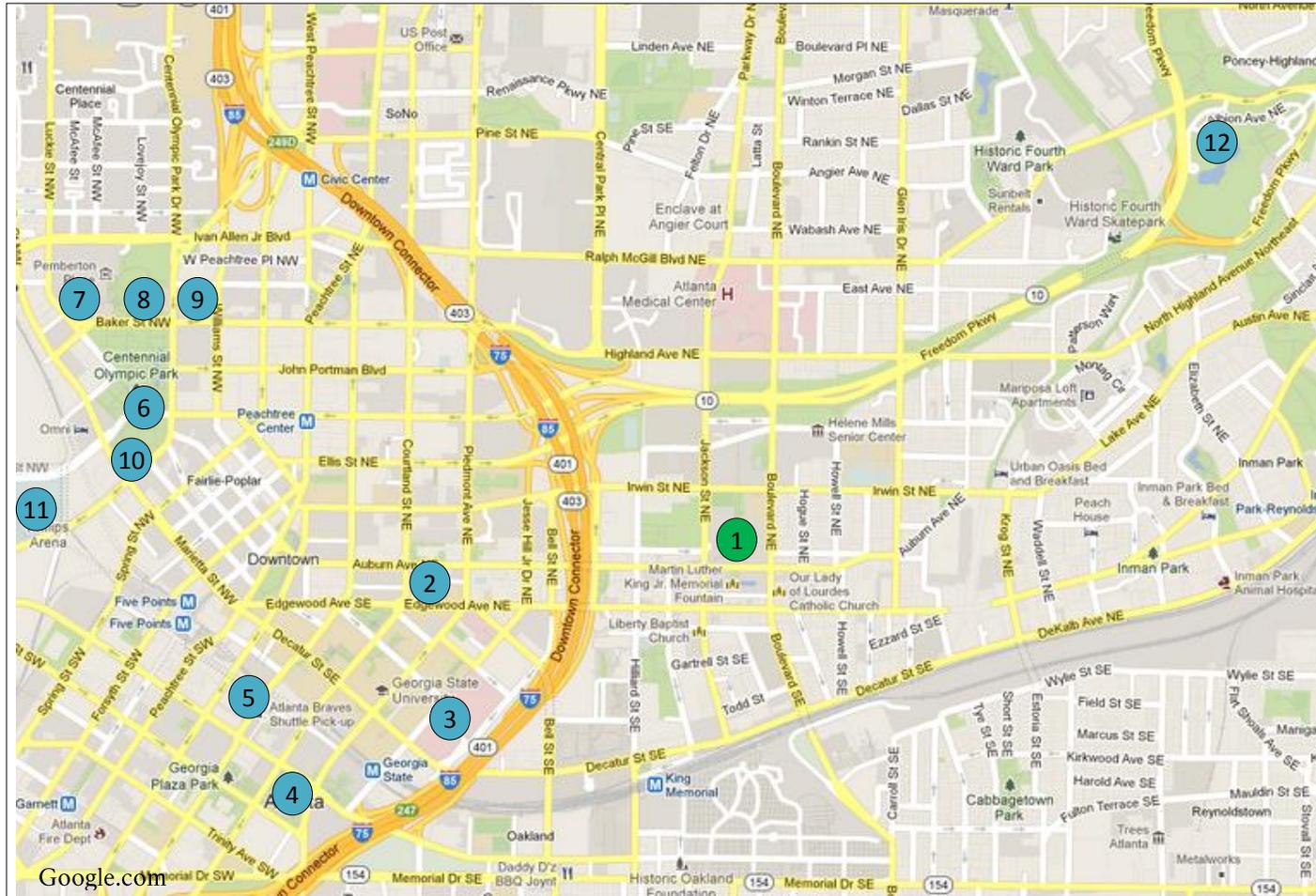
#### ***Rights-of-Way Permits***

The NPS is under congressional mandate not to allow any use of NPS land that would be a derogation of the values and purposes for which the

park was authorized or be incompatible with the public interest, except when authorized by Congress. The regulations used to manage rights-of-way are found in 36 CFR 14.

Park Service policy (NPS-53) states that no permits for new, widened, or lengthened right-of-ways will be issued in designated or proposed wilderness. Right-of-ways for new gas or oil pipelines will not be issued anywhere in a national park area. When undocumented utility lines exist in a park, if the park allows the line to remain, a right-of-way permit must be prepared and submitted for final execution by the Superintendent. Appropriate conditions and stipulations are placed in any right-of-way permit to protect resources, if warranted. The NPS will recover all costs incurred to issue the right-of-way permit and monitor any activity associated with the permit. Fees paid by the permit holder for the use of the government land go directly to the US Treasury.

## Appendix B: Map of Local Attractions



1. Martin Luther King, Jr. National Historic Site
2. Apex Museum
3. Georgia State University
4. Georgia state capitol
5. Underground Atlanta
6. Centennial Olympic Park
7. Georgia Aquarium
8. World of Coca-Cola
9. Imagine It! The Children's Museum of Atlanta
10. CNN Center
11. Phillips Arena
12. Jimmy Carter Library and Museum

## Appendix C: Directory of Local Accommodations, Dining Options, and Convenience Stores

Name	Address	City	State	Zip	Phone	Website
<i>Food and Beverage Services within 0.5 Mile Radius of Park</i>						
Cafe Circa	464 Edgewood Avenue SE	Atlanta	GA	30312	(404) 477-0008	www.cafecircaatl.com
Cafe 458	458 Edgewood Avenue SE	Atlanta	GA	30312	(404) 446-4688	www.cafe458atl.com
Edgewood Corner Tavern	464 Edgewood Avenue SE	Atlanta	GA	30312	(404) 577-2310	www.thecornertavern.com
Edgewood Pizza	478 Edgewood Avenue SE	Atlanta	GA	30312	(404) 522-5512	www.facebook.com/pages/Edgewood-Pizza/115250818500819
The Sound Table	483 Edgewood Avenue SE	Atlanta	GA	30312	(404) 835-2534	www.thesoundtable.com/st-nights
Thumbs Up Smokehouse	573 Edgewood Avenue SE	Atlanta	GA	30312	(404) 223-0690	www.thumbsupdiner.com
Miso Izakaya	619 Edgewood Avenue SE	Atlanta	GA	30312	(678) 701-0128	www.facebook.com/misoizakaya
Ammazza Restaurant	591 Edgewood Ave SE	Atlanta	GA	30312	(404) 228-1036	www.ammazza.com
Pizzeria Vesuvius	327 Edgewood Ave SE	Atlanta	GA	30312	(404) 343-4404	www.pizzeriavesuvius.com
LottaFrutta Gourmet Fruit House	590 Auburn Avenue NE	Atlanta	GA	30312	(404) 588-0857	www.lottafrutta.com
The Original Jamaican Restaurant	378 Edgewood Avenue SE	Atlanta	GA	30312	(404) 523-1331	www.pattiestop.com
Noni's Bar & Deli	357 Edgewood Avenue SE	Atlanta	GA	30312	(404) 343-1808	www.nonisdeli.com
Supreme Fish Delight	362 Auburn Avenue NE	Atlanta	GA	30312	(404) 522-5333	www.supremefishdelight.com
Rathbuns Restaurant	112 Krog Street NE	Atlanta	GA	30307	(404) 524-8280	www.rathbunsrestaurant.com
Serpas Restaurant	659 Auburn Avenue NE #501	Atlanta	GA	30312	(404) 688-0040	www.serpasrestaurant.com
Wok-N-Roll	250 Auburn Avenue NE	Atlanta	GA	30303	(404) 688-7818	www.atlantawoknroll.com
Sweet Auburn Bread Company	234 Auburn Avenue NE	Atlanta	GA	30303	(404) 221-1157	www.sweetauburnbread.com
Mangos Caribbean Restaurant	180 Auburn Avenue NE	Atlanta	GA	30303	(404) 698-3992	www.mangoscaribbeanrestaurant.com
Grindhouse Killer Burgers	209 Edgewood Avenue SE	Atlanta	GA	30303	(404) 522-3444	www.grindhouseburgers.com
<i>Convenience Stores within a 0.5 Mile Radius of Park</i>						
CVS/pharmacy	439 Highland Avenue NE	Atlanta	GA	30312	(404) 230-9385	www.cvs.com
Walgreens	340 NE Boulevard #143	Atlanta	GA	30312	(404) 525-8256	www.walgreens.com
Banna Grocery	529 Irwin Street NE	Atlanta	GA	30312	(404) 254-3689	None
Sweet Auburn Grocery	200 Auburn Avenue NE	Atlanta	GA	30303	(404) 343-1418	None
<i>Hotels within a 1 Mile Radius of Park</i>						
Sheraton Atlanta Hotel	165 Courtland Street NE	Atlanta	GA	30303	(404) 659-6500	www.starwoodhotels.com/sheraton/property/overview/index.html?propertyID=1144

Name	Address	City	State	Zip	Phone	Website
Hilton Atlanta	255 Courtland Street NE	Atlanta	GA	30303	(404) 659-2000	www3.hilton.com/en/hotels/georgia/hilton-atlanta-ATLAHHH
Marriott Marquis	265 Peachtree Center Avenue NE	Atlanta	GA	30303	(404) 521-0000	www.marriott.com/hotels/travel/atlmq-atlanta-marriott-marquis
Hyatt Regency Atlanta	265 Peachtree Street NE	Atlanta	GA	30303	(404) 577-1234	www.atlantaregency.hyatt.com/hyatt/hotels-atlantaregency
Courtyard Atlanta Downtown	133 Carnegie Way NW	Atlanta	GA	30303	(404) 222-2416	www.marriott.com/hotels/travel/atldo-courtyard-atlanta-downtown
The Ellis Hotel	176 Peachtree Street NE	Atlanta	GA	30303	(404) 523-5155	www.ellishotel.com
Residence Inn Atlanta Downtown	134 Peachtree St NW	Atlanta	GA	30303	(404) 522-0950	www.marriott.com
The Westin Peachtree Plaza, Atlanta	210 Peachtree St NE	Atlanta	GA	30303	404) 659-1400	www.westinpeachtreeplazaatlanta.com
Hyatt Place Atlanta Downtown	330 Peachtree Street NE	Atlanta	GA	30308	(404) 577-1980	www.atlantadowntown.place.hyatt.com/hyatt/hotels-atlantadowntown-place
Motel 6 Atlanta Downtown	311 Courtland Street NE	Atlanta	GA	30303	(404) 659-4545	www.motel6atlantadowntownga.com
<b><i>Bed &amp; Breakfasts/Small Inns within a 1 Mile Radius of Park</i></b>						
Urban Oasis Bed & Breakfast	130 Krog Street NE	Atlanta	GA	30307	(770) 714-8618	www.urbanoasisbandb.com
Sugar Magnolia Bed & Breakfast	804 Edgewood Avenue NE	Atlanta	GA	30307	(404) 222-0226	www.sugarmagnoliabb.com
King-Keith House	889 Edgewood Avenue NE	Atlanta	GA	30307	(404) 688-7330	www.kingkeith.com
Inmanpark Bed & Breakfast	100 Waverly Way NE	Atlanta	GA	30307	(404) 688-9498	www.inmanparkbandb.com

## Appendix D: Partnerships Meeting Attendee Lists

Meeting Date: November 5, 2012

Name	Title	Organization
Kerrie Cotton Williams	Archivist	Auburn Avenue Research Library on African American Culture and History
Cynthia Walton	Historian	Southeast Regional Office , National Park Service
Tara Spann	Sales Manager	Atlanta Convention & Visitors Bureau
Ellie Westman Chin	Vice President, Business Development and Corporate Events	Atlanta Convention & Visitors Bureau
David Stanhope	Deputy Director	Jimmy Carter Library and Museum
Jennifer Ball	Vice President, Planning and Economic Development	Central Atlanta Progress

Meeting Date: November 7, 2012

Name	Title	Organization
Milan Jordan	Assistant Project Manager	Historic District Development Corporation
Dan Moore, Sr.	President	APEX Museum
Cynthia P. Lewis	Archivist	The King Center/ The King Library & Archive
Don Wollenhaupt	Program Manager - Education	Southeast Regional Office , National Park Service
Becky Burke	Region Manager	Eastern National
Angie Laurie	Vice President, Transportation	Central Atlanta Progress
Will Marshall	Global Organizer	Southern Christian Leadership Conference
Jesse Clark	Executive Director	Historic District Development Corporation
Eric Tidwell	Acting Managing Director	The King Center
Steve Klein	Communications Director	The King Center
Reverend Shanan Jones	Assistant Pastor of Public Relations and Community Affairs	Ebenezer Baptist Church
JoAnn Haden Miller	Director, Consumer Markets	Atlanta Convention & Visitors Bureau
Jay Tribby	Chief of Staff	Council Member Kwanza Hall, Council District 2

# Appendix E: Civic Engagement Document

<to include any documents used in the public meeting >

# Appendix F: Sample Commercial Use Authorization Permit

Form 10-114 (CUA)  
Rev. 1/2004

**UNITED STATES DEPARTMENT OF THE INTERIOR**  
National Park Service  
**INSERT PARK NAME HERE**  
**COMMERCIAL USE AUTHORIZATION**

**1. Permit Holder** \_\_\_\_\_ **Park Alpha Code:** \_\_\_\_\_  
Name \_\_\_\_\_  
Organization \_\_\_\_\_ **Type of Use:** Commercial Services  
Address \_\_\_\_\_ **Date Authorization Approved:** \_\_\_\_\_  
Telephone Number \_\_\_\_\_ **Reviewed:** \_\_\_\_\_  
Fax Number \_\_\_\_\_ **Expires:** \_\_\_\_\_

2. The holder is hereby authorized to use the following described land or facilities in the above named area:  
  
The area must be restored to its original condition at the end of the authorization.

3. The authorization begins at \_\_\_\_\_ (am/pm) on \_\_\_\_\_ (Month/Day/Year).  
4. The authorization expires at \_\_\_\_\_ (am/pm) on \_\_\_\_\_ (Month/Day/Year).

5. SUMMARY OF AUTHORIZED ACTIVITY: (see attached sheets for additional information and conditions)

\_\_\_\_\_ **Out-of-Park:** The commercial services described above must originate and terminate outside of the boundaries of the park area. This permit does not authorize the holder to advertise, solicit business, collect fees, or sell any goods or services within the boundaries of the park area.

\_\_\_\_\_ **In-Park:** The commercial service described above must originate and be provided solely within the boundaries of the park area.

6. Authorizing legislation or other authority: Section 418, P.L. 105-391 (16 USC 5966)

7. NEPA Compliance: CATEGORICALLY EXCLUDED \_\_\_\_\_ EA/FONSI \_\_\_\_\_ EIS \_\_\_\_\_ OTHER APPROVED PLANS \_\_\_\_\_

8. APPLICATION FEE: Received \_\_\_\_\_ Not Required \_\_\_\_\_ Amount \_\_\_\_\_

9. LIABILITY INSURANCE: Required \_\_\_\_\_ Not Required \_\_\_\_\_ Amount \_\_\_\_\_

10. COST RECOVERY: Required \_\_\_\_\_ Not Required \_\_\_\_\_ Amount \_\_\_\_\_

11. FACILITY USE FEE: Required \_\_\_\_\_ Not Required \_\_\_\_\_ Amount \_\_\_\_\_

**ISSUANCE of this authorization is subject to the conditions.** The undersigned hereby accepts this authorization subject to the terms, covenants, obligations, and reservations, expressed or implied herein.

12. Signatures

Authorization:

\_\_\_\_\_  
Signature Title Date

Authorizing NPS Official:

\_\_\_\_\_  
Signature Title Date

Authorizing NPS Official:

(additional if required)

\_\_\_\_\_  
Signature Title Date

**CONDITIONS OF THIS AUTHORIZATION**

1. The holder is prohibited from knowingly giving false information. To do so will be considered a breach of conditions and be grounds for revocation: [RE:36 CFR 2.32(a)(3)].

2. The holder shall exercise this privilege subject to the supervision of the park area Superintendent. The holder shall comply with all applicable laws and regulations of the area and terms and conditions of the authorization. The holder must acquire all permits or licenses of State or local government, as applicable, necessary to provide the services described above, and, must operate in compliance with all applicable Federal, State, and local laws and regulations, including, without limitation, all applicable park area policies, procedures and regulations. The commercial services described above are to be provided to park area visitors at reasonable rates and under operating conditions satisfactory to the park area superintendent.

3. This authorization is issued upon the express condition that the United States, its agents and employees shall be free from all liabilities and claims for damages and/or suits for or by reason of any injury, injuries, or death to any person or persons or property of any kind whatsoever, whether to the person or property of the (holder), its agents or employees, or third parties, from any cause or causes whatsoever while in or upon said premises or any part thereof during the term of this authorization or occasioned by any occupancy or use of said premises or any activity carried on by the (holder) in connection herewith, and the (Holder) hereby covenants and agrees to indemnify, defend, save and hold harmless the United States, its agents, and employees from all liabilities, charges, expenses and costs on account of or by reason of any such injuries, deaths, liabilities, claims, suits or losses however occurring or damages growing out of the same.

4. Holder agrees to carry general liability insurance against claims occasioned by the action or omissions of the holder, its agents and employees in carrying out activities and operations under this authorization. The policy shall be in the amount of \$ \_\_\_\_\_ and underwritten by a United States company naming the United States of America (National Park Service, park name and address) as additional insured. Holder agrees to have on file with the park copies of the above insurance with the proper endorsements.

5. Cost incurred by the park as a result of accepting and processing the application and managing and monitoring the authorization activity will be reimbursed by the holder. Administrative costs and estimated costs for activities on site must be paid when the authorization is approved. If any additional costs are incurred by the park, the holder will be billed at the conclusion of the authorization.

6. Benefit - Neither Members of, nor Delegates to Congress, or Resident Commissioners shall be admitted to any share or part of this authorization or derive, either directly or indirectly, any pecuniary benefit to arise therefrom: Provided, however, that nothing herein contained shall be construed to extend to any incorporated company, if the authorization be for the benefit of such corporation.

7. This authorization may not be transferred or assigned without the written consent of the park area Superintendent.

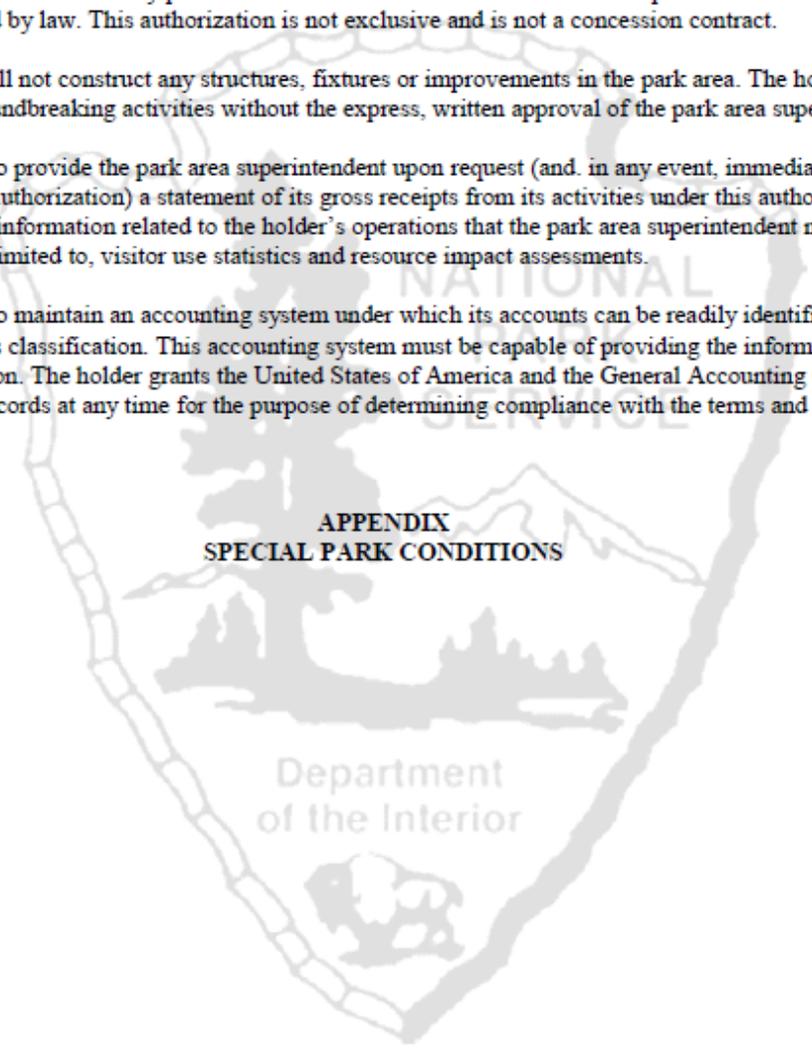
8. This authorization may be terminated upon breach of any of the conditions herein or at the discretion of the park area Superintendent.

9. The holder is not entitled to any preference to renewal of this authorization except to the extent otherwise expressly provided by law. This authorization is not exclusive and is not a concession contract.

10. The holder shall not construct any structures, fixtures or improvements in the park area. The holder shall not engage in any groundbreaking activities without the express, written approval of the park area superintendent.

11. The holder is to provide the park area superintendent upon request (and, in any event, immediately after expiration of this authorization) a statement of its gross receipts from its activities under this authorization and any other specific information related to the holder's operations that the park area superintendent may request, including but not limited to, visitor use statistics and resource impact assessments.

12. The holder is to maintain an accounting system under which its accounts can be readily identified within its system of accounts classification. This accounting system must be capable of providing the information required by this authorization. The holder grants the United States of America and the General Accounting Office access to its books and records at any time for the purpose of determining compliance with the terms and conditions of this authorization.



**APPENDIX  
SPECIAL PARK CONDITIONS**

Department  
of the Interior