

### 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.

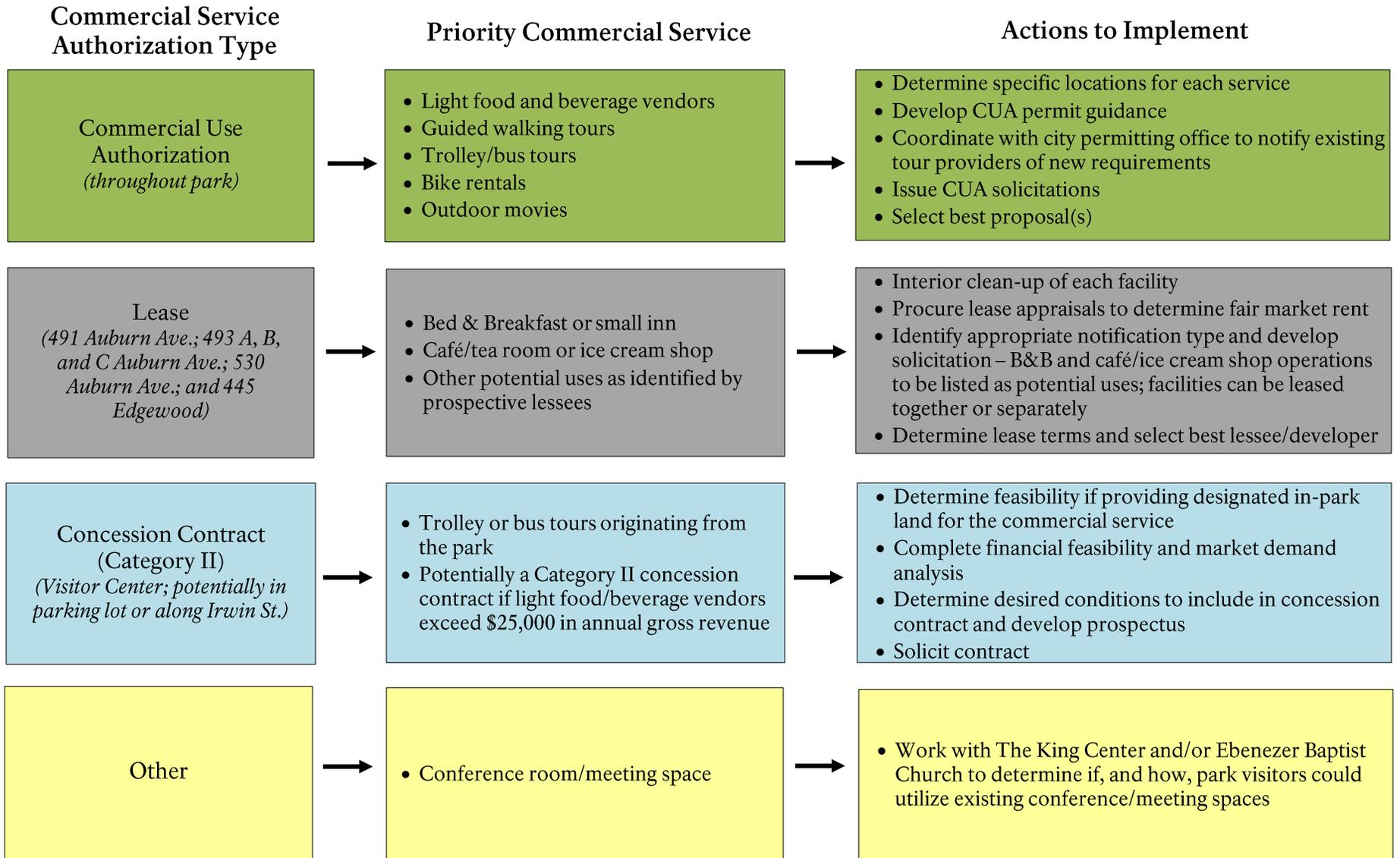
### Facility, Maintenance, and Staffing Considerations

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