

April 20, 2021

AYL Management Group, LLC
930 New Hope Road, #11-501
Lawrenceville, Georgia 30045
Via email: aylmanagementgroup@gmail.com

RE: 306 Ponce de Leon Avenue (Celebrity Club-Atlanta Eagle); Atlanta, Fulton County

Dear AYL Management Group, LLC,

Thank you for your interest in the Georgia and National Registers of Historic Places. The Historic Preservation Division's National Register staff has reviewed the information sent to us in support of preliminary assessment of eligibility for nomination of the above-referenced property.

We are pleased to convey that based on the information provided, the property appears to potentially meet the criteria for listing in the National Register of Historic Places under Criterion A in the area of Social History for its association with LGBTQ history in Atlanta, an underrepresented historic property association, as an example of an intact, significant LGBTQ-oriented community gathering space dating to the early documented era of such spaces in Atlanta. As there is currently not an LGBTQ-focused historic context for Atlanta or Georgia, successful nomination of this property will require that you research and narrate a context that includes comparative analysis of this property to other LGBTQ-related properties in Atlanta, sufficient to thoroughly document this property as significant in that context. At this time, we believe an appropriate period of significance for the nomination would begin in 1985, with the opening of the Celebrity Club. The end of the period of significance will require further research and will depend on the final areas of significance and the associated significant trends that that research identifies. Please note, this would be a unique nomination, and if you choose to proceed, you will need to contact us so that we can work with you to further investigate model nominations and relevant sources.

The property may also be eligible at the local level under Criterion B in the area of Social History for its association with the early career of RuPaul Andre Charles, an entertainer that has demonstrably influenced the LGBTQ and entertainment communities in Atlanta and beyond. More research, specifically comparative analysis and placing his significance in context, would be needed to determine whether his association is sufficient to constitute a separate case for significance under Criterion B and at what level, or if this would be more appropriately captured as part of the overarching case for Social History under Criterion A, discussed above. Per National Register Bulletin 15: *How to Apply the National Register Criteria for Evaluation*, "Properties eligible under Criterion B are usually those associated with a person's productive life, reflecting the time period when he or she achieved significance....Properties that pre- or post-date an individual's significant accomplishments are usually not eligible." The Bulletin goes on to state, "Each property associated with an important individual should be compared to other associated properties to identify those that best represent the person's historic contributions. The best representatives usually are those associated with the person's adult or productive life." Based on the

information provided, the property in question appears to have a tangible association with Charles' productive life, but note that additional documentation will be required to thoroughly document this association.

Because the club operated during a period less than 50 years ago, successful nomination of this property will also depend on your team's ability to justify the case(s) for the property's significance as "exceptionally significant," and thereby, meeting Criteria Consideration G: Properties that have Achieved Significance Within the Last 50 Years, as defined in National Register Bulletin 15: *How to Apply the National Register Criteria for Evaluation*. The documentation provided has made a good start at this justification, but a nomination effort will need to develop this further.

The information provided indicates that the building's integrity at this time is sufficient to convey the resource's potential significance for the purposes of the National Register. However, as there is obvious water infiltration in several areas, please note that preliminary eligibility determinations are predicated on the condition and integrity of a property as documented in the submitted application, and any loss or deterioration of integrity, including the building's form or materials, could impact this eligibility determination.

To continue the National Register process, you will need to complete all elements of HPD's Packet for Nominating Individual Resources to the National Register of Historic Places, available on our website at <https://www.dca.ga.gov/georgia-historic-preservation-division/national-register-research-survey/national-register-0/part-2>. Please note that HPD does not use the version of the 10-900 provided on the National Park Service's website or continuation sheets. Please be sure to follow all guidance in the "Packet" for current requirements regarding formatting, documentation, and mapping standards.

We appreciate your interest in the Georgia and National Registers and historic resources in Georgia and look forward to working with you further on this project. Please contact me at 404-486-6373 or stephanie.cherry-farmer@dca.ga.gov if you have questions about your Georgia/National Register nomination.

Sincerely,



Stephanie L. Cherry-Farmer
National Register and Survey Program Manager

SLC-F/cra

Cc: Charlie Paine, Historic Atlanta, Inc. (Via email: charlie@paineatl.com)