

25 April 2022

Atlanta Police Foundation, Inc.  
191 Peachtree Street NE, Suite 1919  
Atlanta, Georgia 30303

**Re:** Terracon Cultural Report for PSTC

1. This report violated the basic foundation of documenting the cultural history of the correct site:

Response: The Goals of the survey were to locate, delineate, identify and evaluate all cultural resources within the project area, and to assess their significance and potential eligibility for listing in the National Register of Historic Places (NRHP)

The term "Cultural Resources" as used in the report is meant to refer to sites or objects that are archaeological, architectural, and/or historic in nature

All work complies with the cultural resource provisions of Section 106 of the National Historic Preservation Act of 1966 (PL 89-190, as amended) and its implementing regulation 36 CFR Part 800 (Protection of Historic Properties).

2. Who reviewed this report for historical accuracy?

Response: Report was prepared and reviewed by Terracon Consultants, Inc.

Individual preparers are:

Brian McNamara, M.A., R.P.A

Brent Handley, M.A., R.P.A

Joshua Newman, B.A.

3. Will this report be corrected and reissued to the stakeholders committee?

Response: Comments noted were reviewed and incorporated in revised Terracon Report dated April 2022.

4. The section titled Regional History mentions the history of slavery in the U.S. South, so why is the presence of enslaved people on this land before it became the Atlanta Prison Farm not mentioned?

Response: See Revised Terracon Report dated April 2022. (Page 4-7, 4-8)

5. This land was a plantation, owned by George Key, at which he held 19 enslaved people according to the 1860 slave census record. Why does this report, in the section titled Atlanta Prison Farm, state that the land that was to become the prison farm was once owned by Lochlin Johnson's plantation? Why is there no mention of George Key? Why is Lochlin Johnson's plantation, which is not the land currently under development, being mentioned at all? The slave census from 1860 and the parcel maps from 1860 are attached for reference.

Response: See Revised Terracon Report dated April 2022. (Page 4-7 to 4-9).

6. In the section of the report titled Atlanta Prison Farm, it states that the Atlanta Prison Farm is also called the Honor Farm. Why is this separate and unrelated property, the U.S. Honor Farm, being conflated with the Atlanta Prison Farm? Why is the rest of this section documenting conditions at the U.S. Honor Farm, which is not the Atlanta City Prison Farm or land currently under development? A map from 1946 that shows the U.S. Honor Farm site is attached for reference.

Response: See Revised Terracon Report dated April 2022. (Page 4-7 to 4-12).

7. Is any of the information about the farm operations, honor system, prisoners becoming "healthful men," referring to the Atlanta City Prison Farm, or are these statements about the U.S. Honor Farm?

Response: The system of farm work was related to the mind set of the time. Both were working farms and near each other.

8. Comment and question: The report mentions that "the City of Atlanta also dumped on the property". Is the dumping limited to the Carnegie stones, or is there more dumping waste? Will this dumping from the City be cleaned up as part of this project?

Response: See Revised Terracon Report dated April 2022. (Page 6-1). All dumped debris within the current defined property limits will be cleaned up.

9. Why were no Informant Interviews conducted? There are local residents who have been hosting tours of the Prison Farm for years, these events are advertised publicly, how can it be claimed that "no such individuals were encountered during the course of this study"?

Response: No individuals were encountered during the course of this study.

10. The remains of Atlanta Zoo animals are known to be buried on the site. Why is there no mention of this in the report?

Response: Our research has concluded that the Atlanta Zoo animals are not buried in our current defined property limits.

11. Were the areas suspected to be informal landfills, identified in the Phase I ESA report, investigated with shovel tests in this study?

Response: Yes

12. The introduction states that the Atlanta Prison Farm is a historic resource considered a historic cultural landscape. What elements of this historic cultural landscape will be preserved within this development plan?

Response: The Atlanta Police Foundation is coordinating with the Atlanta Preservation Center in the evaluation of the results of this report.

Sincerely,  
**Terracon Consultants, Inc.**