



Working Together for Healthy Rivers

(706) 549-4508
info@garivers.org
www.garivers.org

September 14, 2023

Jeff Cown
GA EPD
2 Martin Luther King, Jr. Drive SE
Suite 1456 East Tower
Atlanta, GA 30334

Dear Director Cown,

Thank you for considering the cultural resources on Okefenokee Trail Ridge and in the Okefenokee National Wildlife Refuge that could be impacted by proposed mining. The archeological evidence demonstrates the presence of human occupations in the area as early as 5000 BC up to the departure of indigenous people from Georgia in the 1830s. The archeological record at this point includes 24 confirmed sites, but further investigation needs to be conducted on these sites and others that may be discovered with more inquiries and research. At this time it's unclear which of these sites may have been ceremonial or burial locations.

Previous archeological surveys of the area show that there are five sites within the Saunders Mine area. These sites contain pre-contact lithic tools, debitage and ceramic artifacts, as well as post-contact historic material.

Research conducted to date by private consultants recommends additional testing to confirm the intensity of the occupation and to determine cultural affiliation with named tribal groups that we know occupied Georgia in later time periods.

Sections of the report say that site boundaries were not defined due to project contractions. One sampling constraint includes the high water table level that caused shovel pits to fill with water, hampering consultants ability to examine as deep as scientifically appropriate in order for appropriate data collection.

In addition to consulting with the Muscogee Nation and other tribes, more investigation is needed to determine the intensity of the occupations and geographical extent.

Please see attached documents, including maps of cultural sites of concern, attached. The attached (first) map depicts the recorded sites - those marked in yellow have reported as having sand mounds that could be burial mounds. None have been formally tested, so no burials have been reported or recovered. 9CR1 is the Chesser Island Home Site, which has a Weeden Island occupation & mound. This is the only mound site that has been field verified.

The other mound sites derived either from information gleaned from local informants or the historic records. The site forms are not very informative. 9CR95 reportedly had a sand mound that was bulldozed ca.

20-30 years ago. A surface collection included sand-tempered sherds, lithic debitage, and fragmentary projectile points.

The sites north of the Chesser Island cluster are around the Refuge's Visitor Center complex and appear to be outside of the Toledo area. Hence, not numbered.

Many thanks,

A handwritten signature in black ink that reads "Rena Ann Peck". The signature is written in a cursive, flowing style.

Rena Ann Peck, Executive Director

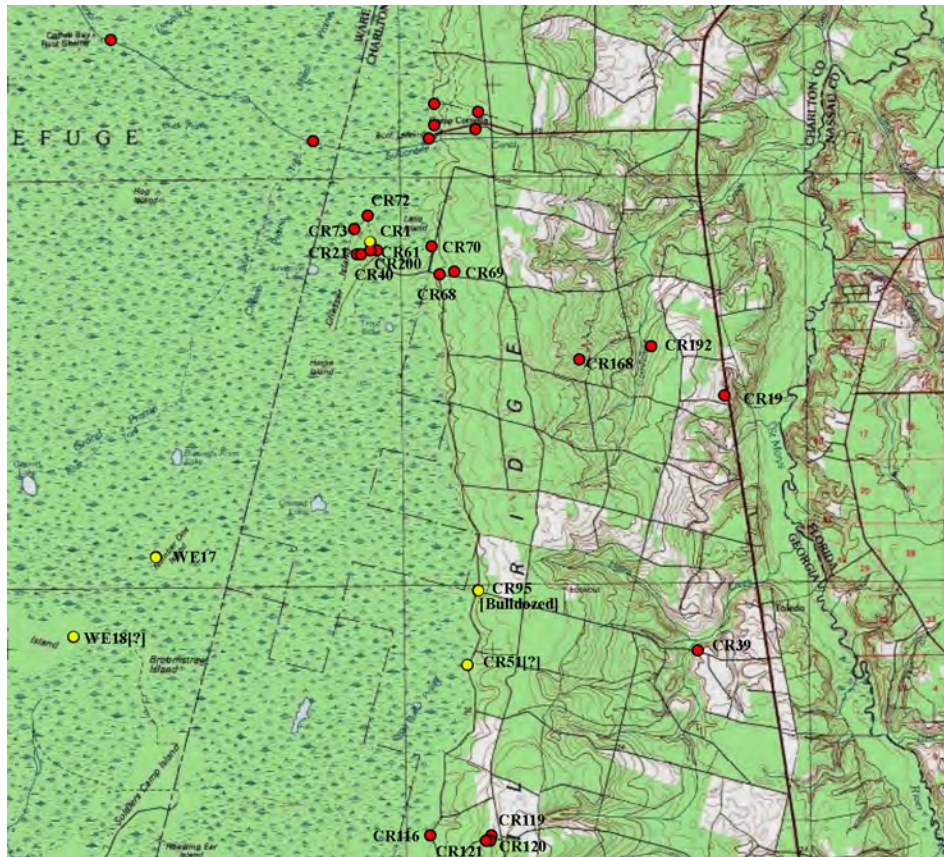
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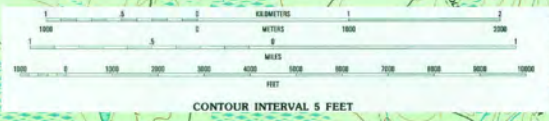
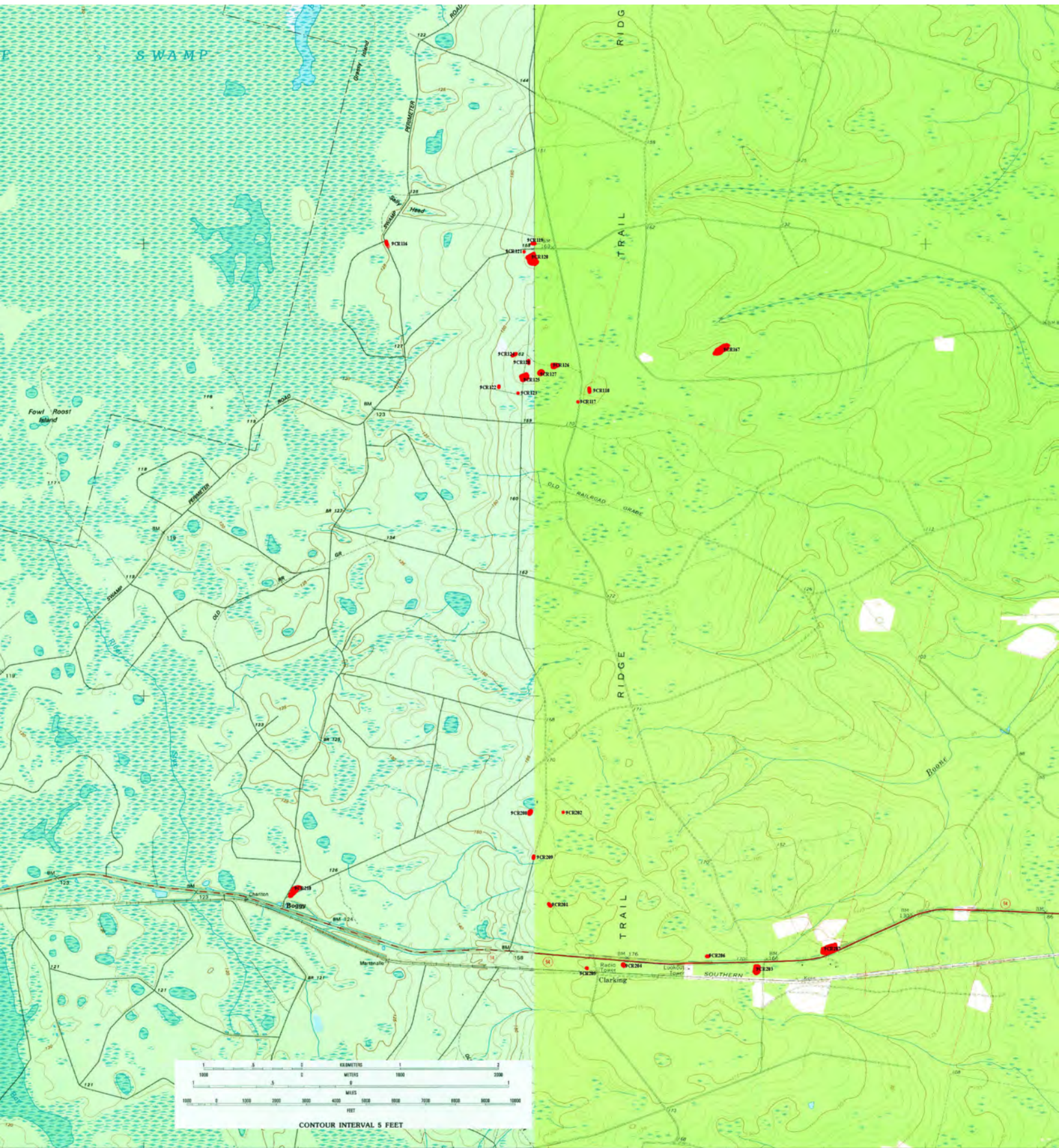
Turner Hunt, Archeologist, Muscogee Nation

Richard Kanaski, Archaeologist, USFWS Region IV

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Site No.	Field No.	Description	Reference
9CR116	L-1	Sparse lithic scatter. Shovel testing did not reveal any intact cultural deposits	A Phase I Cultural Resource Survey of the Twin Pines Minerals Loncala Property in Charlton County, Georgia (2018) [Loncala]
9CR117	L-4	Lithic debitage recovered from one unit. Follow-up pedestrian walk-over and shovel testing did not yield additional material.	Loncala
9CR118	L-5	Lithic debitage recovered from shovel test unit. Site boundaries not defined due to project constraints.	Loncala
9CR119	L-7	Mid/Late 19 th – early 20 th century historic period artifact scatter & isolated flake	Loncala
9CR120	L-8	Lithic scatter; dense debitage concentration in one of the shovel unit interpreted as a potential activity area. Additional testing recommended	Loncala
9CR121	L-9	Lithic scatter [n=2 from single unit]; Follow-up pedestrian walk-over and shovel testing did not yield additional material.	Loncala
9CR122	L-11	Lithic scatter [n=6 from two units]; Follow-up pedestrian walk-over and shovel testing did not yield additional material.	Loncala
9CR123	L-12	Lithic scatter [n=3 from one unit]; Follow-up pedestrian walk-over and shovel testing did not yield additional material.	Loncala
9CR124	L-13	Lithic and ceramic scatter. Recovered ceramic included 1 Carabelle Incised sherds, 2 plain sand-tempered rim sherds, 8 plain sand-tempered sherds, and 5 sherdlets.	Loncala
9CR125	L-14	Lithic scatter [surface and test units] and isolated historic period artifact [railroad spike]; Chert debitage & 2 biface fragments, one of which thought to be the proximal end of a Newnan point.	Loncala
9CR126	L-15	Lithic and historic period ceramic scatter. Debitage [n=8] recovered from test units. Historic period ceramics [n=4 stoneware] thought to represent a late 19 th – early 20 th century occupation.	Loncala
9CR127	L-16	Lithic scatter that included at least one biface. Material on surface on recovered from 2 units.	Loncala
9CR128	L-17	Sparse lithic scatter. Additional chert debitage [n=2] recovered during shovel testing.	Loncala

9CR167	T8-01	Lithic debitage on surface and in several units. Additional testing recommended.	Archaeological Reconnaissance of Trail Ridge, Charlton County, GA (1998)
9CR201	K-3	Lithic scatter. Follow-up pedestrian walk-over and shovel testing did not yield additional material.	A Phase I Cultural Resource Survey of the Twin Pines Minerals Keystone Property in Charlton County, Georgia (2018) [Keystone]
9CR202	K-5	Historic period scatter [n=7 Albany slipped stoneware (possibly from same vessel)]. Follow-up pedestrian walk-over and shovel testing did not yield additional material.	Keystone
9CR203	K-6	Late 19 th – Early 20 th Century House site & light density lithic and ceramic indicating potential Middle Archaic and Middle Woodland occupations [plain sand-tempered sherds; possible Bakers Creek and Stanly Stemmed points].	Keystone
9CR204	K-7	Historic house site.	Keystone
9CR205	K-9	Light density historic period artifact scatter [late 19 th – early 20 th house site?]	Keystone
9CR206	K-10	Light density historic period artifact scatter thought to represent a “dumping episode”.	Keystone
9CR207	TP-1	Historic artifact scatter [20 th century house site]	A Phase I Cultural Resource Survey of the Twin Pines Minerals Adirondack Property in Charlton County, Georgia (2020) [Adirondack]
9CR208	TIAA-1	Lithic debitage and tool scatter recovered from the surface.	A Phase I Cultural Resource Survey of the Twin Pines Minerals TIAA Property in Charlton County, Georgia (2019) [TIAA]
9CR209	TIAA-2	Lithic debitage observed in road and one unit.	TIAA
9CR210	TIAA-3	Early – middle 20 th century artifact scatter	TIAA