

PRINCE WILLIAM SOUND CONSERVATION ALLIANCE

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OCT 27 1989

DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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Bob Dick
State Forester
Division of Forestry
Department of Natural Resources
Juneau, AK

Copy

October 20, 1989

Dear Bob,

I am writing to express my concern about the logging practices followed by Ocean Green at their Two Moon Bay site. As you know, this is an operation that both PWSCA and CDFU (Cordova District Fishermen United) have expressed concern about in the past.

Although we support logging activity on private lands, we also advocate protection of public resources including soil and water quality. Ocean Green's site with its overly steepened, glacially carved slopes is typical of all of Prince William Sound's fiords. Precipitation in the Sound ranges from a low of about 60 inches in Valdez to around 250 inches on Montague Island. The site at Two Moon Bay is on the low side of this range. The combination of steep slopes and high precipitation increases the chances for erosion, slope failure, siltation of streams and sediment plumes entering the coastal waters and affecting marine habitats.

It is important to us that new timber harvest regulations fully address these problems. I would like to invite you to come to Valdez and visit the site at Two Moon Bay so that you can better assess the nature of the problem and help us to arrive at a mutually satisfactory solution.

As always, I continue to support your efforts to upgrade DOF personnel

and the forest practice industry's awareness of the importance of planning for future resource productivity through stopping the loss of our top soil.

For you information, I am enclosing a copy of Tom McCarty's Memo of October 20, 1989 to Dave Sturdevant, DEC, Juneau, some photographs, and a video tape with a short segment on the operation at Two Moon Bay.

Please let me know if you can schedule a visit within the next couple of weeks, so that I can begin making arrangements. I look forward to the opportunity to see and talk with you again.

Sincerely,



Nancy R. Lethcoe

cc: Jack Lamb, CDFU
Tom Copeland, Prince William Sound Seiners Association
Bob Loeffler, DNR
Amy Kyle, DEC

ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION
PRINCE WILLIAM SOUND DISTRICT OFFICE
DRAWER 1709
VALDEZ, ALASKA 99686
(907) 835-4698

MEMORANDUM

DATE: October 20, 1989

TO: Dave Sturdevant, Ecologist/Juno

FROM: Tom McCarty, EFO III/Valdez

SUBJECT: Two Moon Bay Logging Operation- Port Fidalgo, PWS

On Oct. 19, 1989, along with Martin Miracle of the DNR and Cevin Gilleland of ADF&G/Habitat biologist, I inspected the subject logging operation at Two Moon Bay. The purpose of this trip was to continue our regular surveillance of this operation due to on-going problems of oil spills, erosion/siltation, ground sloughing, stream crossings, water quality concerns, solid waste disposal, etc. This operation began initial "clearing" of timber for the development of roads, building pads, etc. in 1987, and met with ADEC PWSDO staff to discuss Dept. regulations, guidelines, etc regarding the project. We initially worked with Mr. Del Welch, the project financier/head honcho. More recently we work with his son Craig Welch who carries the title of safety/ environmental manager.

It became apparent early on that there was a lack of communication between the logging company(incidentally, the company goes under several names, i.e. Citigreen Inc., Oceangreen Alaska, Inc., Welaska Inc.) and the regulatory agencies. We issued NOV's and were headed to court several times but received voluntary compliance and worked with the company to keep them in line. For the most part, the regulatory agencies have been lenient on the operator, which has led to expansion of the problem. We have tried to improve the situation by spending more time onsite, and by specifying(in writing) exactly what is required of the operator.

Over time, it has become apparent that we spending a great deal of time trying to keep these guys out of trouble. In most cases we become aware of an on-going problem only after an onsite inspection, or through a complaint, or a rumor. By the time we are able to respond to a problem it is too late, the damage is done.

I have attached a copy of some video footage shot over two periods of time at Two Moon Bay. What it indicates is general poor management and sloppiness in operations. What it doesn't clearly show is the potential for largescale environmental damage due to this attitude. This is just the tip ;of the iceberg. This is a 10 year timber cut, and there are more of these proposed cuts in PWS just around the corner!

I see part of the problem as a failure of the system to protect the environment from an operator who chooses to give lip service only to the regulatory agencies. It is too easy for the operator to simply state that he will provide protection to soil and water by following the best forest management practices. I believe Mr. Craig Welch is trying to do the best job he can given the resources at hand, but not having the resources is not a valid excuse to muddle through the project leaving a trail of destruction in there wake.

What I observed on October 19 during our inspection at the Two Moon logging site was numerous small streams that were muddy brown from the erosion of logging drag lines, road construction, and general operations. I observed no erosion control methods being utilized, nor any prevention/control equipment onboard(silt curtain, sed. basins, etc.). Few culverts are actually in at this point, although I understand that is not a requirement during road development. There is little attempt to control the muddy runoff. Cutting is occurring on very steep slopes. Cutting is occurring along the streams with the trees falling into the streambeds. The topsoil, without the adhesion provided by the root structure, is being carried off the steep sideslopes and into the streamflow. That muddy streamflow joins with other small streams and eventually reach the water of Two Moon Bay. We witnessed a muddy line extending about one-half mile into the Bay from these streams.

In the interest of time I will cut this memo short, and simply recommend that you contact me if you have questions or wish to visit this site yourself. I am meeting with Nancy Lethcoe to discuss this and other logging issues in the Sound as I feel this is the most important environmental concern facing us for the next decade. I don't see the existing protective measures as effective unless there is a concerted effort by all agencies to apply them to the limit allowable, and to each project equally. I would like to have a better understanding of the Forest Practice Act and the best forest management practices along with their application, authority, etc. This is the only way to apply preventive measures to the problem. the water quality regulations appear to only work after-the-fact.

STATE OF ALASKA

STEVE COWPER, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

PRINCE WILLIAM SOUND DISTRICT OFFICE
DRAWER 1709
VALDEZ, ALASKA
99686

907/835-4698

RECEIVED
JAN 10 1990

January 11, 1990

Mr. Craig Welch
Ocean Green Alaska, Inc.
Box 1209
Valdez, AK 99686

DEPARTMENT OF
ENVIRONMENTAL CONSERVATION

Re: Two Moon Bay Logging Camp, Water and Sewer Systems
Plan Review

Dear Mr. Welch:

On October 19, 1990 members of the Alaska Department of Environmental Conservation (ADEC), Department of Natural Resources (DNR), and Alaska Department of Fish and Game (ADF&G) inspected the Two Moon Bay Logging operation. Each agency has their particular area(s) of interest during these inspections, and we want to take this opportunity to express ADEC's interest as a result of the October 19 inspection trip.

First, there were numerous small streams flowing across clear cut areas, down the main use road, and adjacent to the leachfield site which appeared laden with silt and dirt. These small tributaries eventually empty into the area streams thence into Two Moon Bay, carrying the eroded soils material with them. As you may recall, we discussed the problems of erosion control for this area of high rainfall, steep slopes, and shallow soils during the planning stages of this project. You assured us that appropriate measures (settling basins, water bars along steep road gradients, filtration, etc.) would be taken to reduce pollutant discharge. You again assured me on October 19 that you would take appropriate measures to control the on-going erosion taking place in this project. You agreed to install silt curtains, water bars, and other measures where needed to control erosion. You also agreed to keep a surplus supply of silt curtain on-hand for emergencies, to monitor the area for erosion/siltation on a regular basis during all rainfall periods, and to respond to erosion problems. We expect to see that some effort has been taken on your part to correct this re-occurring problem. Please notify this office of what measures have been implemented to reduce and control erosion on this project.

Second, the water supply and wastewater disposal systems designed by Valdez Engineering, Inc. have not received final ADEC approval. They are therefore not to be used until the engineer has completed his final inspection, submitted the final as-built plans, and received Department plan approval. On October 19, our inspection indicated that the systems were connected and in use. This is in violation of 18 AAC 72, Wastewater Disposal, and 18 AAC 80,

Drinking Water Regulations as I instructed you on this day. Be advised that use of these systems prior to receiving plan approval from the Department may result in legal action against Ocean Green Alaska, Inc. for failure to follow Department regulation following our notification. Please notify this office of what steps you are taking to complete this project.

Third, you indicated that you were ready to place the large fuel tanks into the large rectangular metal tanks. This was part of the engineering plan suggested by Ocean Green Alaska and accepted by the Department under the professional stamp of your engineer. You choose this option rather than constructing lined containment areas for spill control. Is this plan intact, and if so, what is the status of this project?

Fourth, your engineer suggested a trial burn of waste oil and oily waste materials on your property in Valdez prior to shipping the burner unit to Two Moon Bay site. This was a good plan to make sure the burner would meet Department air quality standards. It is our understanding that you agreed to this test burn. We asked to witness this burn and you agreed to contact us when this occurred. We still want to witness this practice burn to judge the ability of the proposed burner to perform within the state standards. The burning of waste oil and/or oily waste in an unacceptable (producing any black smoke) manner is prohibited.

Finally, you agreed to keep a close watch on hydraulic line leaks and other oily leaks on your equipment, and to be sure your operators know that they must report these spills to the appropriate Ocean Green supervisor. Have you followed this procedure? We hope you are following up on this agreement.

We want to reiterate the importance of controlling soil erosion resulting in the siltation of streams and Two Moon Bay. Mr. Martin Miracle's September 13, 1989 Forest Practices Inspection Report noted four slides caused by debris torrents that have left bare slopes up to one acre in size. He indicated that these were the result of yarding material over shallow surface soil. In his report, Miracle suggested seeding these areas to prevent further erosion. He also recommended avoiding timber cutting in areas where the soil is saturated to eliminate the debris flows and slope failures. He goes on to say that you have assigned the responsibility of pioneer road layout to the shovel operator as you do not have anyone skilled in this area on-site to perform this critical activity. Road building is a critical activity falling under the authority of the Forest Practices Act, and requires a skilled experienced professional on-site to make the many critical choices required in road layout.

As Mr. Gary Liepitz, habitat biologist, ADF&G, presented in his November 14, 1989 letter to Martin Miracle, DNR, which you were copied, the agencies are very concerned, as a result of field inspections, for slides in the cutting units due to steep and unstable slopes. We have learned that several slides have occurred

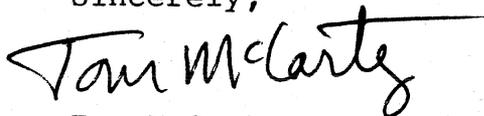
in these areas, and may have impacted anadromous fish streams. This emphasizes the need for the 100-foot no cut buffer along streams and a 200-foot select harvest buffer beyond this no-cut zone. I agree with Mr. Liepitz's statement that it was only because of the adequate buffer along the shoreline immediately east of the camp that prevented the large slide that occurred at your first materials site from reaching the waters of Two Moon Bay.

In closing, I understand the agencies mentioned above are planning inspection trips to Two Moon Bay over the next several months. I expect we will have the opportunity to discuss the items presented in this letter, but I would hope that you will take the appropriate action to correct these problems immediately, if you haven't already.

As we have discussed, future notifications will be subject to management prescriptions agreed upon in the forest practices revisions.

I hope that we can work together in the coming year to resolve the problems at the Two Moon Bay logging site. Please provide us with the information requested so that we may continue our review of your project.

Sincerely,



Tom McCarty
Field Officer
Telephone 835-4698

cc: V. Gilbert, ADNR/DLWM (PROFS)
C. Welch, Ocean Green Alaska, Inc.
R. Rogers, Rogers Forest Mgmt.
M. Gordaoff, Tatitlek Corp.
J. Brady, ADF&G
M. Miracle, ADNR
A. Kyle, ADEC
D. Sturdevant, ADEC
B. Lamoreaux, ADEC
G. Liepitz, ADF&G
J. Vogt, Valdez Engineering