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1891 Ga. Hwy. 178
Lyons, GA 30436
P. 912-526-7909
F. 1-800-861-4705

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July 5, 2010

Dan Roach
Rayonier Forest Resources
P. O. Box 728
Fernandina Beach, FL 32035

Dear Mr. Roach,

The Georgia Forestry Commission recently received a complaint from James Holland on behalf of Altamaha Riverkeeper, Inc. (ARK) concerning alleged Best Management Practices violations on property owned by RTOC Limited Partnership in McIntosh County. The tract in question lies between I-95 and Georgia 251. The harvest operation is located at or near UTM 456608E 3479008N. Through a contract with the Georgia Environmental Protection Division (EPD), the Georgia Forestry Commission (GFC) is responsible for investigating and mediating such complaints where the chemical, physical or biological integrity of state waters may be impaired as a result of forestry activities. As Forest Water Specialist for southeast Georgia, it is my responsibility to follow up on these complaints to determine legitimacy, if general guidelines called Best Management Practices (BMPs) were followed, make recommendations to correct any problems where BMPs have not been followed, and follow up to make sure any problems have been corrected to protect water quality.

The harvest in question totals approximately 76 acres in two clearcuts separated by a 100 foot wide buffer. This buffer acts as a wildlife corridor and to minimize the size of each clearcut. There is no stream channel in this buffer. There is also a 100 foot buffer retained for aesthetic purposes and as a wildlife corridor around the perimeter of the harvest area that separates this clearcut from adjoining stands. A portion of the harvest occurred in the spring of 2009, as shown on the 2009 aerial photo enclosed, with the remainder of the harvest to date occurring during February and March of 2010. USDA Soil Maps show the area to be a part of Chisholm Swamp. I made site visits with Rayonier personnel on April 19, 2010, and May 12, 2010. I visited the site with the Rayonier personnel, Frank Green, GFC Statewide Water Quality Coordinator, and Shaun Blocker, Project Manager with the United States Army Corps of Engineers on May 4, 2010.

USDA Soil Maps printed in 1961 with field work occurring in the late 1950s show intermittent streams in the area of the harvest. However, field examinations of the area revealed no defined stream channels within or immediately adjacent to the harvest area. Conversations with NRCS employees in the area indicate that these findings are not inconsistent with their findings for this area.

They believe that the construction of I-95 and also beaver activity in the area has changed the hydrology of this section of Chisholm Swamp. This lack of defined stream channels results in the area being considered an ephemeral area instead of a series of intermittent streams. This is an important distinction because Georgia BMP guidelines do not require Streamside Management Zones (SMZs) on ephemeral areas. In its complaint letter, ARK alleged “unauthorized stream crossings” in photos 2106, 3157, 3161, 3172 and 3176. You have been provided copies of Mr. Holland’s complaint letter and photos. Since there are no stream channels within or adjacent to the harvest area and adjoining buffers, no stream crossings were observed.

ARK photos 2097, 2112, 2127, 2137, 3151, 3163, 3174, 3185, and 3186 show what ARK believes to be extreme rutting and excessive numbers of skid trails. Because of the wet nature of this tract, mat or shovel logging was used to harvest the timber. In this type of logging, a series of mats or trails are laid down using trees as the base for the trails. All equipment, both cut down machines and skidders, is then run on top of the trail to minimize rutting across the tract. For the equipment to run on the mat, stumps under the mat must be cut low. Stumps outside of the mat trails have been left higher to ensure that they remain above the high water level to promote sprouting for regeneration of the tract. Most track cut down machines and shovel machines can reach out 25 to 30 feet, pick up a tree, and then lay it on the mat for the skidder to pick up and transport to the loading deck for processing. Thus, for the machinery to stay on the mats and minimize rutting across the tract, the mats must be spaced 50 to 60 feet apart across the tract. After the timber is harvested from a mat, the material in the mat is removed and utilized so that any water movement across the tract will not be affected. This mat logging technique is specifically designed to minimize soil disturbance by limiting equipment travel to the area where mats occur. Some compaction of the soil beneath the mat is to be expected after the mat material is removed. Some rutting was observed on the loading decks and in conjunction with the main skid mat trails, as is expected on a site of this type. This rutting has not been observed to be adversely affecting water movement or water quality.

ARK photos 3151, 3160, 3163, 3172, 3172, and 3178 allegedly show extensive sediment movement and in the case of photo 3160, an alleged oil spill. No movement of sediment from the harvested area was observed during field inspections. No instance of oil spillage, as alleged in the ARK photo, was observed on the ground during field inspections. On the areas that were cut in the spring of 2009, extensive reproduction, both stump sprouts and seedlings of all species present on the tract prior to harvest including cypress, was observed during field inspections.

It is my understanding that the USACE will be documenting their findings based on the site visit in a Memorandum for Record (MFR) that will be placed in their administrative file. If you wish to have a copy of this MFR, please contact Ms. Katie Freas with the USACE at 912-652-5051. No BMP inconsistencies were observed on the tract. If you have any questions concerning this matter please contact Frank Green or me. I appreciate your cooperation and the cooperation of all Rayonier personnel involved in this investigation. Please distribute this letter within your company as needed.

Sincerely,

Bryan Snow
Forest Water Specialist

Cc Frank Green – GFC
Richard Morgan – USACE
Katie Freas - USACE
Shaun Blocker – USACE
Billy Nelson – GFC
Jeremy Hughes – GFC
Alice Vick – EPD
Deborah Sheppard – ARK
James Holland