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2.09.2009

Dr. Achim Steiner
UNEP Executive Secretary

cc: **Julia Marton-Lefevre**, IUCN Director General
Jean-Claude Killy, Chairman of the IOC Coordination Commission
For Sochi 2014 Olympic Winter Games
Dmitry Chernyshenko President of Organising Committee "Sochi 2014"

Dear Dr. Steiner,

First, let us express our sincere gratitude for the UNEP's active role in supporting environmental safety of Sochi 2014 Olympic Winter Games. With your strong involvement a number of key decisions have been made by the Russian government and some mechanisms for the dialogue with the civil society established.

This year, however, brought very worrying news. In particular, we would like to draw your attention to the ongoing construction of the "Adler – Krasnaya Polyana" combined railroad and motorway, which should connect the sea coast with the mountain cluster.

This construction started a year ago with no proper project design and accompanying environmental impact assessment and now approached some of the most valuable parts of Sochi national park with outstanding woodlands of the relict trees such as European yew (*Taxus baccata*), box (*Buxus colchica*) and wing nut (*Pterocarya pterocarpa*) with associated shrubs and grasses. Massive cuts of wing nut stands has already taken place in June-August this year, which was documented by the park officials together with JSC "Russian Railways" representatives (Attachment No.1). However, no action was taken to stop this illegal activity despite the destroyed area was recognized as unique for this endangered plant.

Even after a year since construction started there is no proper project design and hence no project evaluation, including obligatory state environmental examination, no permits for construction, no legal status of the project. This is absolutely illegal according to the Russian

legislation as is the case in other countries.

We brought this up several times at various meetings and in media, but the road is still being built disregarding any environmental concerns.

On the 19-20th of August 2009 a group of environmental activists and Sochi citizens tried to stop illegal construction by blocking skidders and workers with motor saws. During this one of the activists was slightly injured by the motor saw as he was trying to stop cutting. When militiamen came, they detained activists and took them to a cell while disregarding obvious break of the law by constructing company. Next day the court ruled both guilty in “disobedience to militiaman” and ordered a fine. Activists appealed to the higher court and their case is now under consideration.

According to recently revealed plans for construction (although they are not legalized as there are no permits), in the nearest future we expect massive destruction of hectares of box and yew forests which also serve as valuable habitats for many threatened animal species (Attachment No.2). Therefore we call on your support to prevent destruction of these unique areas.

In particular, with regard to the MOU between UNEP and IOC and specific MOU between UNEP and Organising Committee “Sochi 2014” we ask you to immediately address the Organising Committee and the Russian Government to terminate further construction of combined railroad and motorway Adler – Krasnaya Polyana and initiate a meeting on site between UNEP, IOC, Organising Committee “Sochi 2014”, international biodiversity experts and NGOs to identify how to avoid unprecedented damage currently anticipated.

Yours sincerely

Andrey Rudomakha
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of Environmental Watch on North Caucasus

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Attachment 1

ACT No.1

OF INVESTIGATION OF COMPARTMENTS 2 AND 3 OF THE VESELOVSKYE DISTRICT FORESTRY OF SOCHI NATIONAL PARK, IN THE CONSTRUCTION AREA OF THE RAILROAD

June 11th, 2009

We, the undersigned, Boris Tuniev, Vice-Director of Sochi National Park (scientific and research work), Honored Environmentalist of the Russian Federation and Doctor of Biological Sciences; Ilya Timukhin, Leading research Officer of Sochi National Park, PhD (Biology); Sako Tuniev, Senior researcher of Sochi National Park, PhD (Biology); Artyn Bagdasarian, Forestry officer of Veselovskoye Forestry, PhD (agriculture); Alexander Vorobiev, Chief of the Department of Land and Property relationship, of preparation to the construction and registration of the property of the DKRS of Sochi "RZD" Public corporation, Andrey Perervenko, inspector for quality and acceptance of the SMR of DKRS of Sochi "RZD" Public corporation; Svetlana Grechko, first category engineer of the Department of land and property relations, construction preparation and property registration of the DKRS of Sochi "RZD" Public corporation reconstruction and development directorate, have drawn up the existing Act that on June 11th, 2009 we have investigated the 2nd and 3rd compartments of the Veselovskoye District Forestry at the entire area allocated for the construction of the "Combined (automobile and rail) road Adler – Alpica Service mountain climate resort".

In course of our extensive field inspection of the aforementioned compartments, we have found areas of high environmental value. The whole square of the area is 10.7 hectares, the total area of dense box tree growth is 6.55 hectares.

The entire inspected area is a mixed forest of beech and box tree, with the canopy dominated by oriental beech (reaching 40 meters in height, 1.5 meters in diameter, 0,8 in density), with isolated occurrence of the European hornbeam. The shrub level is represented by box tree (reaching 15 meters in height, 400 years in age, density of 0.9-1.0). There is an average of 1.5 box tree specimen per square meter.

The grass layer is represented by ramsons, broomrape, wavyleaf basketgrass, arum orientale, *Asarum europaeum* subsp. *Caucasicum*, *Phyllitis scolopendrium*

Among the fauna there is presence of the European parsley frog (IUCN Red List, Red Data Books of the Russian Federation and Krasnodar Territory),, the Northern banded newt (IUCN Red List, Red Data Books of the Russian Federation and Krasnodar Territory), the Caucasian toad (IUCN Red List, Red Data Books of the Russian Federation and Krasnodar Territory),, the Long-legged Wood Frog (Red Data Book of Krasnodar Territory), the marsh frog, the Aesculapian snake (Red Data Books of the Russian Federation and Krasnodar Territory), the Derjugin's lizard (IUCN Red List and Red Data Book of Krasnodar Territory), Brauner's rock lizard (Red Data Books of the Russian Federation and Krasnodar Territory), the Caucasus viper (IUCN Red List, Red Data Books of the Russian Federation and Krasnodar Territory), and the meadow lizard (IUCN Red List).

The entire area also has nestling biotops of the common blackbird, song thrush, coal tit, and other birds. The brown trout and Ukrainian brook lamprey (IUCN Red List, Red Data Books of the Russian Federation and Krasnodar Territory) inhabit the stream that flows through the area.

The existing act is worked out in four copies. June 11th 2009.

TUNIEV B.S.

TIMUKHIN I.N.

BAGDASARYAN A.A.

VOROBIEV A.P.

PERERVENKO A.O.

GRECHKO S.O.

Attachment 2

ACT № 2 OF INVESTIGATION OF THE NORTH PORTAL OF THE TUNNEL №1 OF INTEGRATED RAILROAD AND HIGHWAY IN THE 29TH COMPARTMENT OF THE VESELOVSKYE DISTRICT FORESTRY OF SOCHI NATIONAL PARK

June 18, 2009

We, the undersigned, Boris Tuniev, Vice-Director of Sochi National Park (scientific and research work), Honored Environmentalist of the Russian Federation and Doctor of Biological Sciences; Ilya Timukhin, Leading research Officer of Sochi National Park, PhD (Biology); Sako Tuniev, Senior researcher of Sochi National Park, PhD (Biology); Artyn Bagdasaryan, Forestry officer of Veselovskoye Forestry, PhD (agriculture); Alexander Vorobiev, Chief of the Department of Land and Property relationship, of preparation to the construction and registration of the property of the DKRS of Sochi "RZD" Public corporation, Andrey Perervenko, inspector for quality and acceptance of the SMR of DKRS of Sochi "RZD" Public corporation; Svetlana Grechko, Svetlana Grechko, first category engineer of the Department of Land and Property relationship, of preparation to the construction and registration of the property of the DKRS of Sochi "RZD" Public corporation, Sochi branch, have drawn up the existing Act that on June 17, 2009 we inspected the 29th compartment of the Veselovskoye District Forestry at the entire area allocated for the construction of the North portal of the tunnel №1 of the "Combined (automobile and rail) road Adler – Alpika Service mountain climate resort".

During the detailed field investigation of the above mentioned compartment there was made a conclusion, that the whole area has the high environmental value. The whole square of the area is 3.94 ha. At the moment of investigation 3.24 ha were cut down and cutting was continuing. 0.7 ha is planned to be cut down.

The largest part of the area (3.44 ha) is represented by the preliminary poly-prepotent flood-land deciduous forest with the mutual predominance of the Caucasian wing nut (IUCN Red Data List, Red Data Books of the Russian Federation and Krasnodar Territory) and black alder (endemic relict of the Tertiary Period), with the participation of oriental beech, European ash, European hornbeam, Caucasian wild cherry, field maple, white willow etc. The height of the wing nut reaches 40 m, diameter reaches 1 m and more, plenitude reaches 0.8 and the age reaches 200 years. The shrub layer is represented by hazel (aged more than 100 years) and curtains of Georgian box (with a height till 15 m, age till 200 years and with a plenitude in curtains equal to 0.9-1.0). The average density of the box forest is 1 specimen./10 m². The undergrowth of the wing nut with a density of 0.5 - 2 specimen./1 m² is widely presented in the whole area (3.44 ha). The largest part of this plot is already cut down. Another 0.2 ha of wing nut (height till 40 m, diameter – till 1.5 m and plenitude – 0.8) is planned to be cut down (with sub-predominance of hornbeam). The shrub layer is represented by box forest (height till 15 m, age - till 400 years, plenitude 0.7-1.0). Average density of box stands is equal to 1 specimen/1 m². The grass layer is represented by ramsons, broomrape, wavyleaf basketgrass, arum orientale, Asarum europaeum subsp. Caucasicum, Phyllitis scolopendrium, Helleborus caucasicus.

The following representatives of the herpetofauna were found here: the Caucasian Parsley Frog (IUCN Red List, Red Data Books of the Russian Federation and Krasnodar Territory), the Caucasian toad (IUCN Red List, Red Data Books of the Russian Federation and Krasnodar Territory), the Long-legged Wood Frog (Red Data Book of Krasnodar Territory), the marsh frog, the Derjugin's lizard (IUCN Red List and Red Data Book of Krasnodar Territory), the Aesculapian Snake (Red Data Books of the Russian Federation and Krasnodar Territory). It is possible to find here the Caucasian viper (IUCN Red List, Red Data Books of the Russian Federation and Krasnodar Territory).

The whole area presents the nestling biotops of common blackbird, song thrush, coal tit, Eurasian jay, woodpeckers, tawny owl and other birds. It is included into the composition of the nestling natural habitat of the peregrine falcon (IUCN Red Data List, Red Data Books of the Russian Federation and Krasnodar Territory). The brown trout and Ukrainian brook lamprey (IUCN Red Data List, Red Data Books of the Russian Federation and Krasnodar Territory) inhabit the stream that flows via the area.

The transplanting of the Caucasian wing nut and rare grass species as well as the discharge of the scrollable representatives of amphibians and reptiles is determined in the 31st compartment (plots 6 and 7) of the Veselovskoye District Forestry, in the limits of the natural habitat of the scrollable species inside the same basin district. The transplanting of the Caucasian wing nut is necessary to carry out to the rare plants nursery in the Adler Forestry of Sochi National Park.

The existing act is worked out in 4 copies.

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