



Silvicultural Best Management Practices Implementation Monitoring for Virginia

2017

Introduction

The Virginia Department of Forestry Best Management Practices Implementation Audit Program is based primarily on the Southern Group of State Foresters published framework for state forestry agencies (http://www.southernforests.org/publications/SGSF%20Regional%20BMP%20Framework%20Protocol%20publication_2007.pdf/view). This standardized protocol was intended to ensure that data collected by southern states could be combined into one report. That report is periodically compiled, prepared and submitted to the USDA Forest Service Region 8, as well as USEPA in Atlanta by the Southern Group of State Foresters. However, this protocol is sufficiently flexible to be applied to each state's individual BMP guidelines. At the direction of the State Forester, Virginia is monitoring 240 harvested tracts each year and compiling an independent annual report based on this protocol. These data are submitted periodically for the Southern Group five-year report (<http://www.southernforests.org/publications>).

Methods

Every quarter of every year, 60 tracts are selected randomly from harvests that received a VDOF final inspection two quarters previous to the audit quarter. This allows approximately six months between BMP implementation and the audit field visit. This timing allows for an assessment of how BMP integrity changes over time and provides for a modest sampling of silvicultural practices, such as site preparation, tree planting and weed control. VDOF is randomizing within each of the three administrative regions (Eastern, Central and Western) with the number of selected tracts proportional to the number of harvests for each sample quarter. This concentrates BMP audits in areas where most harvesting is occurring. In this, the tenth audit cycle (1st – 4th quarter, 2017), there are 240 total audits completed and the regional breakdown is displayed in Table 1.

Table 1. Number of BMP audits completed by VDOF administrative region during the audit cycle for the 2017 calendar year.

| Region | Number of Audits |
|---------|------------------|
| Central | 106 |
| Eastern | 83 |
| Western | 51 |

Each audit tract will result in a “% Yes” score for each BMP category. That percentage describes what proportion of audit questions in that category that were applicable to that tract were positively fulfilled by the operator in the field. The audit questions are evaluated and answered during a field visit by one of four water quality engineers and/or nine water quality specialists who are full-time VDOF personnel. Every auditor is regularly trained in a group setting to maintain accuracy and consistency across the state. This enables VDOF to evaluate audit results generally by BMP category or type.

Each of the 240 tracts audited is treated as a discreet unit, and the average and median tract scores are reported as the “harvest average or median score.” Each audit is comprised of 117 questions in 10 categories (Appendix A). These data are also combined across all tracts, and all question responses are averaged together as a single data set by audit category and reported as the “BMP average.” This is the average percentage of “Yes” responses when all audit questions are considered together without regard for the individual tract audits. This approach attempts to more accurately describe the overall BMP condition as a whole in Virginia. This BMP average also assigns greater importance to audits that have more applicable questions. These data consist of 28,080 total questions of which 19,660 were deemed not applicable, 707 were answered “No” and 7,713 were answered “Yes.” These categories and questions relate directly to the major recommendations outlined in the BMP manual entitled *Virginia's Forestry Best Management Practices for Water Quality, 5th Edition*. This technical manual is available online

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(http://www.dof.virginia.gov/infopubs/BMP-Technical-Guide_pub.pdf). In most cases, a large portion of the questions may not apply to any specific tract. Questions or entire categories that do not apply to a tract are given a non-applicable (N/A) status and are not included for calculation of final results. This ensures that calculated averages do not reflect missing items that do not apply to the harvest.

Each individual question in the audit process is also tracked over time to determine which BMP issues in the BMP Manual are in need of improvement. This information is particularly valuable to the SHARP Logger program, which is an SFI industry-sponsored logger training program at Virginia Tech (<http://sharpllogger.vt.edu/>) as it can help guide future educational efforts. These data also will assist VDOF, industry and consulting personnel as they inspect tracts and assist operators on the ground.

Results

The data for the 2017 audit are displayed as a series of tables and charts. Table 2 displays overall BMP average data for the entire state by BMP category. Confidence in the data is reported as a 95 percent margin of error and was calculated according to the SGSF protocol and generally accepted statistical procedures.

While Table 2 shows statewide results, Table 3 shows the BMP average values by VDOF administrative region. These averages (Tables 2 and 3) are the result of combining questions in the categories across all 240 audits as a single complete set and averaging those questions by category. This is the best method to evaluate overall BMP issues across the state. It is important to note that when all individual harvest audit scores were simply averaged together (harvest average) the value calculated is somewhat different and, in this case, is approximately 92.0 percent statewide. The averages in Tables 2 and 3 address the overall BMP condition as indicated by all audits combined while the average value of the tract audits (92.0 percent) ignores the fact that not all audits are the same with regard to number of pertinent issues (non-N/A questions) involved and assumes all audits are of the same weight. Both values are useful and correct as long as the user understands the difference as stated above and in the previous “Methods” section.

These data indicate that very little site preparation (fire, mechanical and chemical) is taking place up to six months after harvest, and it is for this reason that caution should be used when considering the importance or value of the site

Table 2. Statewide data for the BMP audit by BMP category. These data represent statewide averages for Virginia for the 2017 audit cycle.

| BMP Category | Number of Tracts | Yes (%) | Margin of Error (%) |
|--------------|------------------|---------|---------------------|
| Chemicals | 4 | 100.0 | +/- 0 |
| Crossings | 104 | 95.5 | +/- 4.1 |
| Decks | 238 | 96.5 | +/- 2.4 |
| Mechanical | 2 | 100.0 | +/- 0 |
| Planning | 239 | 89.6 | +/- 4.0 |
| Roads | 181 | 88.5 | +/- 4.7 |
| Skidding | 240 | 88.0 | +/- 4.2 |
| SMZs | 179 | 93.0 | +/- 3.8 |
| Wetlands | 6 | 94.4 | +/- 18.7 |
| All | 240 | 94.4 | +/- 3.0 |
| Logging | 240 | 94.4 | +/- 3.0 |

Table 3. Regional data for the BMP audit by BMP category. These data represent regional averages for all three regions for the 2017 audit cycle.

| BMP Category | Central (% Yes) | Eastern (% Yes) | Western (% Yes) |
|--------------|-----------------|-----------------|-----------------|
| Chemicals | N/A | 100.0 | 100.0 |
| Crossings | 95.1 | 97.6 | 93.4 |
| Decks | 95.6 | 98.6 | 95.2 |
| Mechanical | 100.0 | 100.0 | N/A |
| Planning | 91.9 | 97.0 | 72.2 |
| Roads | 86.7 | 93.1 | 88.5 |
| Skidding | 86.9 | 97.1 | 81.4 |
| SMZs | 92.7 | 96.4 | 88.4 |
| Wetlands | 100.0 | 93.5 | N/A |
| All | 90.7 | 96.7 | 87.7 |

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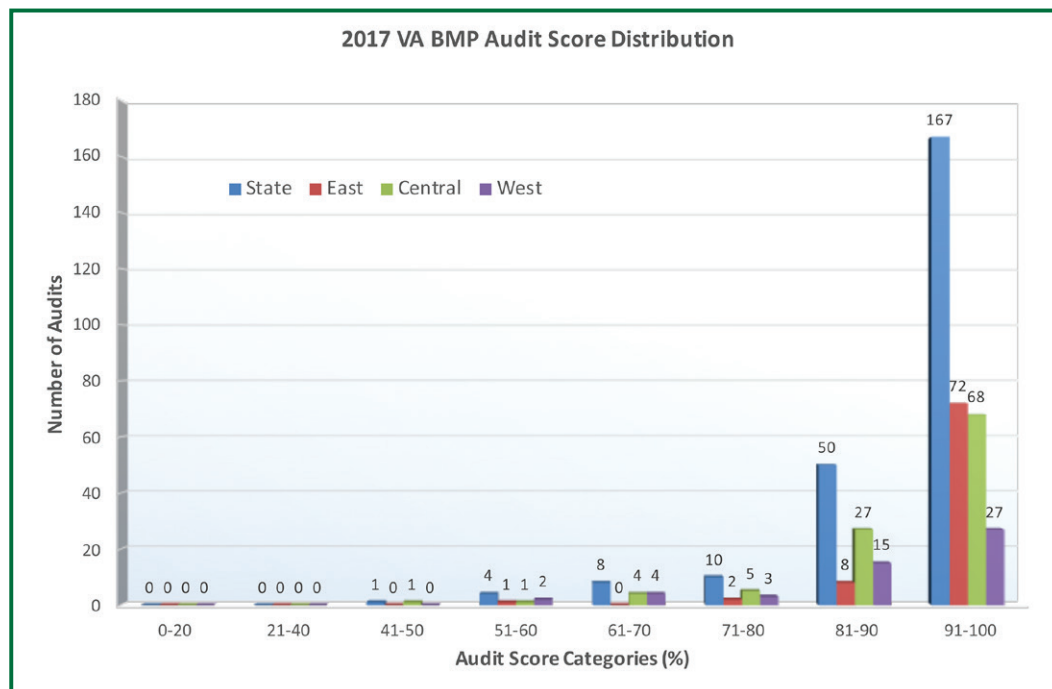
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preparation averages. Greater than one third of all audit tracts (100 of 240) had at least one stream or wetland crossing. It is apparent that three very important categories that often lead to water quality concerns, roads, crossings and skid trails, sometimes lag behind other categories with regard to implementation percentage (Tables 2 and 3), although these three categories are slightly improved from the previous year.

The histogram (Figure 1) indicates that the vast majority of tracts scored an overall implementation percentage of 81 percent or greater. While the overall mean BMP implementation for all tracts is 94.4 percent (Table 2) and the overall harvest average score is 92.0 percent, the harvest median score is 95 percent. Given the skewed distribution of the overall scores in Figure 1, the median is perhaps a better judge of central tendency of the tract score data. These results indicate a steady level of BMP implementation statewide over recent years, and it should be understood that random sample averages fluctuate over time and small year to year changes may not indicate a real change in BMP implementation. Any real changes will become apparent over the long term as more data are accumulated.

This audit report includes the expectation that all BMPs should be done per the manual regardless of likely impacts on water quality on each harvested tract. In most cases, BMPs that are not done do not directly impact water quality. These BMPs can be considered “luxury” BMPs as they are recommended by the manual but are not necessarily impacting water quality. Any BMP failures on the part of the operator that directly impact water quality are apparent in the significant risk and active sedimentation tallies as reported in Table 4 and the explanation below. These singular failures are also handled through the VDOF silvicultural water quality law enforcement process according to § 10.1-1181.2 (<http://law.lis.virginia.gov/vacode/title10.1/chapter11/section10.1-1181.2/>).

Figure 1: A histogram describing the score distribution of all 240 audits for the 2017 audit cycle in Virginia.



[gov/vacode/title10.1/chapter11/section10.1-1181.2/](http://law.lis.virginia.gov/vacode/title10.1/chapter11/section10.1-1181.2/)).

The definition of significant risk describes a water quality concern that is observed on an audit tract that, due to a lack of BMPs, is causing or is likely to cause pollution. When a significant risk was noted during an audit field visit, the auditor also determined if active sedimentation was occurring. Audits that indicated a significant risk were isolated and evaluated independently of all other audits. Out of the 240 tracts in this audit cycle, two (0.83 percent) had at least one significant risk, and none of those tracts (0 percent) had an active sedimentation concern. Table 4 summarizes the specific problems that were noted on the two tracts.

A second analysis including only tracts with at least one significant risk issue determined that the average “% Yes” score for those two harvests was 85.1 percent, the median harvest score was 85.2 percent and the average harvest score was 85.2 percent, which indicates that long-term water quality problems tend to persist on tracts where overall BMP implementation is well below the average and median values for all tracts.

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The 104 audit tracts that were located in the Chesapeake Bay watershed were isolated and averages were calculated. The Bay harvest average score was 92.3 percent, and the tract median score was 96.6 percent while the BMP average of all the audit questions combined for all the Bay tracts was 92.3 percent. This is roughly the same as the state as a whole. The Bay data also indicate that there was one tract with significant risk issues, and no tracts with active sedimentation were observed.

Table 4 indicates that operations that disturb or expose soil near to streams are more likely to cause a significant sedimentation risk if not properly stabilized. A combination of improper skid trail stabilization and unstable stream crossing

approaches combine to include a large number of risks. Nearly all risks are related directly to un-stabilized, exposed soil near a waterway. Simply avoiding most operations in or near to riparian areas would likely reduce risks to water quality. Minimizing roads, decks and stream crossings would clearly be beneficial to water quality risk reduction and would also reduce the number of BMP issues that need attention during and after the operation. Specific BMP deficiencies that almost always contribute to sedimentation issues deal specifically with a lack of drainage and stabilization of roads particularly on or near to stream crossings approaches. It is critical that operators use dips, bars and turnouts to guide water off of roads and clean gravel on slopes and approaches near waterways.

Table 4: Tally and description of significant risks to water quality and associated active sedimentation for the 2016 BMP audit cycle.

| BMP Issue by Region and Type | Risk | Sediment |
|---|----------|----------|
| Central Region | 0 | 0 |
| Eastern Region | 2 | 0 |
| Crossings | 1 | 0 |
| Are stream banks and approaches re-claimed with sufficient vegetation, rock or slash? | 1 | 0 |
| Skidding | 1 | 0 |
| Are water turnouts built to ensure drainage of skid trails where needed? | 1 | 0 |
| Western Region | 0 | 0 |
| Statewide Total | 2 | 0 |

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Appendix A: Individual Audit Questions and Scores

| Audit Questions by Category | Response Counts | | | | % Yes |
|---|-----------------|-----------|------------|--------------|-------------|
| | N/A | No | Yes | Total | |
| Chemicals | 944 | – | 16 | 960 | 100.0 |
| Did applicators avoid mixing chemicals or filling equipment where runoff would likely enter a stream? | 236 | – | 4 | 240 | 100.0 |
| Did applicators remove all refuse from the tract? | 236 | – | 4 | 240 | 100.0 |
| Did chemical applicators avoid accidental drift into sensitive areas or SMZs? | 236 | – | 4 | 240 | 100.0 |
| Did chemical applicators avoid applying chemical directly into streams or SMZs? | 236 | – | 4 | 240 | 100.0 |
| Crossings | 3,769 | 36 | 755 | 4,560 | 95.4 |
| Are approaches stable and unlikely to contribute sediment to the stream? | 140 | 3 | 97 | 240 | 97.0 |
| Are culvert pipes installed properly in the channel to avoid undercutting and channel erosion? | 213 | 1 | 26 | 240 | 96.3 |
| Are culverts and bridges of adequate length? | 168 | 1 | 71 | 240 | 98.6 |
| Are culverts covered with adequate and appropriate fill material? | 213 | 1 | 26 | 240 | 96.3 |
| Are culverts covered with gravel to reduce erosion near the stream? | 213 | 2 | 25 | 240 | 92.6 |
| Are culverts properly sized according to the BMP manual Tables 6 and 7 or Talbot's formula? | 216 | 2 | 22 | 240 | 91.7 |
| Are fords used only where a natural rock base (or geoweb) and gentle approaches allow? | 234 | – | 6 | 240 | 100.0 |
| Are head walls stabilized with vegetation, rock or fabric to minimize cutting? | 213 | 1 | 26 | 240 | 96.3 |
| Are permanent bridge abutments adequate and stable? | 237 | – | 3 | 240 | 100.0 |
| Are stream banks and approaches re-claimed with sufficient vegetation, rock or slash? | 150 | 8 | 82 | 240 | 91.1 |
| Are stream crossings installed at or near to right angles where possible? | 136 | 1 | 103 | 240 | 99.0 |
| Are stream crossings minimized? | 136 | 6 | 98 | 240 | 94.2 |
| Are temporary culverts, pole bridges and bridges removed? | 162 | 3 | 75 | 240 | 96.2 |
| Are water diversion structures present when needed on approaches? | 171 | 7 | 62 | 240 | 89.9 |
| Do all ford crossings avoid restricting the natural flow of water? | 232 | – | 8 | 240 | 100.0 |
| Do all ford crossings have a 50-foot approach of clean gravel? | 232 | – | 8 | 240 | 100.0 |
| Do all ford crossings have underlying geo-textile where needed (on approaches)? | 239 | – | 1 | 240 | 100.0 |

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| Audit Questions by Category | Response Counts | | | | % Yes |
|---|-----------------|-----------|--------------|--------------|-------------|
| | N/A | No | Yes | Total | |
| Is the addition of unnatural materials in the stream to facilitate the use of a ford minimized? | 232 | – | 8 | 240 | 100.0 |
| Were pole bridges used only in appropriate circumstances? | 232 | – | 8 | 240 | 100.0 |
| Decks | 528 | 58 | 1,574 | 2,160 | 96.4 |
| Are all decks limited in size? | 2 | 2 | 236 | 240 | 99.2 |
| Are all log decks located at least 50 feet from the nearest SMZ. | 46 | 5 | 189 | 240 | 97.4 |
| Are appropriate soil protection measures in place to prevent erosion on the deck? | 11 | 21 | 208 | 240 | 90.8 |
| Are decks reshaped where needed to ensure drainage? | 101 | 2 | 137 | 240 | 98.6 |
| Are fluid spills from equipment minimal? | 5 | 1 | 234 | 240 | 99.6 |
| Are log decks located on relatively well-drained ground with low to moderate slopes? | 2 | – | 238 | 240 | 100.0 |
| Are sediment trapping structures present if needed to prevent pollution? | 194 | – | 46 | 240 | 100.0 |
| Are water diversion structures installed to prevent water from crossing the deck? | 165 | 19 | 56 | 240 | 74.7 |
| Is the deck free of trash, garbage and other non-slash debris related to the harvest operation? | 2 | 8 | 230 | 240 | 96.6 |
| Fires | 3,600 | – | – | 3,600 | N/A |
| Are command and staging areas located away from streams? | 240 | – | – | 240 | N/A |
| Are large areas of bare soil re-vegetated where slope exceeded 5%? | 240 | – | – | 240 | N/A |
| Are water bars installed properly on firelines, roads and cleared areas? | 240 | – | – | 240 | N/A |
| Did fire crew avoid plowing up and down slopes where possible? | 240 | – | – | 240 | N/A |
| Did fireline construction avoid disturbing existing gullies? | 240 | – | – | 240 | N/A |
| Did the burning crew avoid exposing large areas of mineral soil? | 240 | – | – | 240 | N/A |
| Did the burning crew avoid pushing firelines directly into streams? | 240 | – | – | 240 | N/A |
| Does fireline construction follow appropriate skid trail BMPs? | 240 | – | – | 240 | N/A |
| Does fireline construction divert water away from streams where necessary? | 240 | – | – | 240 | N/A |
| Is all fire-related debris removed from stream channels? | 2409 | – | – | 240 | N/A |
| Is all refuse and sewage disposed of properly? | 240 | – | – | 240 | N/A |
| Is vegetation or slash on firelines and cleared areas to prevent erosion as needed? | 240 | – | – | 240 | N/A |
| Were high intensity site-prep burns kept out of the SMZs? | 240 | – | – | 240 | N/A |

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| Audit Questions by Category | Response Counts | | | | % Yes |
|--|-----------------|-----------|------------|--------------|--------------|
| | N/A | No | Yes | Total | |
| Were prescribed burns on fragile soils and steep slopes absolutely necessary to achieve goals? | 240 | – | – | 240 | N/A |
| Were steep grades and/or fragile soils protected from excessive burn and ground disturbance? | 240 | – | – | 240 | N/A |
| Mechanical_SP | 3,348 | – | 12 | 3,360 | 100.0 |
| Are SMZs maintained with no significant disturbance? | 239 | – | 1 | 240 | 100.0 |
| Did all mechanical operations avoid slopes in excess of 45%? | 238 | – | 2 | 240 | 100.0 |
| Did all mechanical operations avoid wet or fragile ground? | 238 | – | 2 | 240 | 100.0 |
| Did all mechanical operations take place on the contour to the extent possible? | 238 | – | 2 | 240 | 100.0 |
| Did bedding contractor avoid tying beds into streams, ditches or drainage structures? | 240 | – | – | 240 | N/A |
| Did machine planters avoid excessive slopes? | 240 | – | – | 240 | N/A |
| Did operators prevent debris or soil in the stream sufficient to degrade banks or impede flow? | 239 | – | 1 | 240 | 100.0 |
| Did raking, piling and windrowing avoid excessive movement or exposure of mineral soil? | 238 | – | 2 | 240 | 100.0 |
| Did scalping, furrowing and sub-soiling avoid connections to drainages? | 240 | – | – | 240 | N/A |
| Is scalping and furrowing less than 6 inches deep and on the contour? | 240 | – | – | 240 | N/A |
| Is soil disturbance minimized across the site relative to establishment goals? | 238 | – | 2 | 240 | 100.0 |
| Was bedding conducted on the contour where possible? | 240 | – | – | 240 | N/A |
| Was machine planting done on the contour? | 240 | – | – | 240 | N/A |
| Was sub-soiling or ripping done on the contour? | 240 | – | – | 240 | N/A |
| Planning | 182 | 56 | 482 | 720 | 89.6 |
| In the case of severe site conditions (very wet or steep) was the harvesting system modified to reduce damage to soil, site and water? | 179 | 12 | 49 | 240 | 80.3 |
| Is there evidence or knowledge of a harvest plan (painted lines, flagging, delineated hazards, SMZs or decks, engineered roads, etc...)? | 2 | 44 | 194 | 240 | 81.5 |
| Is there evidence that the logger utilized a harvesting system that is generally appropriate for the site and timber conditions? | 1 | – | 239 | 240 | 100.0 |

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| Audit Questions by Category | Response Counts | | | | % Yes |
|--|-----------------|------------|--------------|--------------|-------------|
| | N/A | No | Yes | Total | |
| Roads | 2,611 | 224 | 1,725 | 4,560 | 88.5 |
| Are grades between 2% and 10% except for necessary deviations? | 71 | 1 | 168 | 240 | 99.4 |
| Are new roads located and constructed to allow for proper drainage? | 186 | 6 | 48 | 240 | 88.9 |
| Are new roads located to avoid erodible, wet and sensitive ground? | 188 | – | 52 | 240 | 100.0 |
| Are riprap and/or brush dams used where needed to slow water and trap sediment? | 216 | 3 | 21 | 240 | 87.5 |
| Are roads built outside of SMZs where possible? | 137 | – | 103 | 240 | 100.0 |
| Are roads daylighted where needed and feasible? | 78 | 2 | 160 | 240 | 98.8 |
| Are roads in SMZs as far from the channel as possible and built to prevent stream sedimentation? | 197 | 1 | 42 | 240 | 97.7 |
| Are roads on the contour where practical? | 79 | 2 | 159 | 240 | 98.8 |
| Are roads outsloped where needed and conditions allow? | 108 | 14 | 118 | 240 | 89.4 |
| Are temporary roads retired with properly constructed water bars or tank traps? | 208 | 2 | 30 | 240 | 93.8 |
| Are turnouts directing water and/or sediment away from riparian areas? | 170 | 3 | 67 | 240 | 95.7 |
| Are under-road culverts installed, spaced and maintained properly? | 210 | 1 | 29 | 240 | 96.7 |
| Is access being controlled with a functional gate or barrier? | 68 | 53 | 119 | 240 | 69.2 |
| Is construction of dips, bars, turnouts and traps adequate to maintain function? | 144 | 16 | 80 | 240 | 83.3 |
| Is gravel or vegetation present to protect water bars from erosion? | 139 | 27 | 74 | 240 | 73.3 |
| Is there rock or vegetation on slopes where needed to prevent erosion? | 93 | 33 | 114 | 240 | 77.6 |
| Is water being “turned out” into surrounding landscape with appropriate structures? | 127 | 27 | 86 | 240 | 76.1 |
| Is water diverted from the road surface at specified intervals using dips, bars or traps? | 127 | 33 | 80 | 240 | 70.8 |
| Was road construction and use minimized? | 65 | – | 175 | 240 | 100.0 |
| Skidding | 1,309 | 217 | 1,594 | 3,120 | 88.0 |
| Are all skid trails free from channelized flow that is likely to cause sedimentation? | 15 | 6 | 219 | 240 | 97.3 |
| Are all skid trails located outside the SMZ? | 55 | 14 | 171 | 240 | 92.4 |
| Are appropriate cross drainages installed where springs or seeps crossed the trails? | 209 | – | 31 | 240 | 100.0 |
| Are bladed skid trails limited to less than 26% grade unless absolutely necessary? | 178 | 5 | 57 | 240 | 91.9 |

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| Audit Questions by Category | Response Counts | | | | % Yes |
|--|-----------------|------------|--------------|--------------|-------------|
| | N/A | No | Yes | Total | |
| Are bladed skid trails limited to side slopes less than 60%? | 185 | 3 | 52 | 240 | 94.5 |
| Are un-bladed trails limited to side slopes less than 36% in general? | 87 | 2 | 151 | 240 | 98.7 |
| Are water bars established on trails where erosion is likely at recommended intervals? | 122 | 46 | 72 | 240 | 61.0 |
| Are water turnouts built to ensure drainage of skid trails where needed? | 143 | 21 | 76 | 240 | 78.4 |
| Did the logger avoid skidding logs through intermittent or perennial streams? | 50 | 2 | 188 | 240 | 98.9 |
| Do trails avoid long, continuous grades? | 47 | 14 | 179 | 240 | 92.7 |
| Do trails avoid rutting that will likely cause channelized erosion near a stream? | 45 | 3 | 192 | 240 | 98.5 |
| Is vegetation established where needed on trails to prevent erosion and sedimentation? | 119 | 64 | 57 | 240 | 47.1 |
| Were brush mats used to stabilize trails and prevent erosion where needed? | 54 | 37 | 149 | 240 | 80.1 |
| SMZs | 1,485 | 114 | 1,521 | 3,120 | 93.0 |
| Are all SMZs a minimum of 50 feet wide on each side of the stream bank? | 63 | 33 | 144 | 240 | 81.4 |
| Are SMZ widths modified to accommodate cold water fisheries and municipal water supplies? | 238 | – | 2 | 240 | 100.0 |
| Did the logger avoid exposing large sections of soil in the SMZ? | 62 | 3 | 175 | 240 | 98.3 |
| Did the logger avoid partial or patch clear cutting in the SMZ? | 63 | 23 | 154 | 240 | 87.0 |
| Did the logger avoid silvicultural debris in the stream that would warrant a law enforcement action under the "debris in the stream law?" | 63 | – | 177 | 240 | 100.0 |
| Did the logger avoid silvicultural sediment in the stream that might endanger public health, beneficial uses or aquatic life as stated in the "silvicultural water quality law?" | 64 | – | 176 | 240 | 100.0 |
| Do all intermittent and perennial streams have an SMZ? | 70 | 16 | 154 | 240 | 90.6 |
| Do all sinkholes or karst features have an SMZ? | 238 | – | 2 | 240 | 100.0 |
| Does at least 50% of the original basal area exist in the SMZ? | 62 | 21 | 157 | 240 | 88.2 |
| In tidal areas, has a 50-foot SMZ been maintained from the grass or marsh edge? | 237 | – | 3 | 240 | 100.0 |
| Is SMZ width relatively consistent along the entire length? | 64 | 16 | 160 | 240 | 90.9 |
| Is the SMZ free of roads and landings where possible? | 65 | 1 | 174 | 240 | 99.4 |
| Was exposed soil in the SMZ re-vegetated or covered with organic materials? | 196 | 1 | 43 | 240 | 97.7 |

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| Audit Questions by Category | Response Counts | | | | % Yes |
|--|-----------------|------------|--------------|---------------|-------------|
| | N/A | No | Yes | Total | |
| Wetlands | 1,884 | 2 | 34 | 1,920 | 94.4 |
| Are landings located on appropriate ground? | 234 | – | 6 | 240 | 100.0 |
| Did operations in wetlands avoid altering hydrology of the site to such a degree as to convert a wetland to a non wetland? | 234 | – | 6 | 240 | 100.0 |
| Did the operation avoid activities during particularly wet weather? | 235 | 1 | 4 | 240 | 80.0 |
| Is water movement maintained on the site? | 234 | 1 | 5 | 240 | 83.3 |
| Was low ground pressure equipment (LGP) utilized where needed? | 235 | – | 5 | 240 | 100.0 |
| Was the harvesting system appropriate for the site conditions? | 234 | – | 6 | 240 | 100.0 |
| Were the 15 mandatory road BMPs followed for wetland roads? | 238 | – | 2 | 240 | 100.0 |
| Were the six mandatory site-prep BMPs followed as needed? | 240 | – | – | 240 | N/A |
| Grand Total | 19,660 | 707 | 7,713 | 28,080 | 91.6 |

Acknowledgements

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