Voluntary Implementation of Forestry Best Management Practices in East Texas



Results from Round 11 of BMP Implementation Monitoring

TEXAS A&M FOREST SERVICE

A Member of the Texas A&M University System

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Results from Round 11 of BMP Implementation Monitoring 2020-2022

by

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TEXAS A&M FOREST SERVICE

Forest Systems
Water Resources Program

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EXECUTIVE SUMMARY

A Best Management Practices (BMP) monitoring program evaluated the level of implementation of non-regulatory forestry BMPs in East Texas. A total of 129 randomly selected sites on which silvicultural activities occurred were evaluated. These sites were monitored between October 6, 2020, and November 20, 2022, and are believed to be a representative sample of the forestry activities that occurred in East Texas during that time.

Overall BMP implementation on the monitored sites was 91.5%. In general, implementation was highest on sites under corporate and public ownership. The corporate lands (commercial landowners that do not have wood processing facilities) scored 94.6%, while National Forest and General Land Office (GLO) sites had an overall implementation of 93.8%. Family forest owners scored 87.6%. No industrial forestland was monitored.

Implementation with BMPs was statistically higher when:

- a forester was involved in the sale or activity
- the landowner was already familiar with BMPs
- BMPs were included in the timber sale contract
- the timber was delivered to an SFI® mill

Implementation was lowest on sites when:

- a forester was not involved in the sale or activity
- the timber was not being delivered to an SFI® mill
- BMPs were not included in the timber sale contract
- the landowner was not familiar with BMPs

Deficiencies noted during the evaluations included:

- stabilizing stream crossings on permanent and temporary roads
- streams free of sediment
- removing temporary crossings
- thinning within allowable specifications in SMZs
- landing locations fee of oil, trash
- mandatory road BMPs being followed in wetlands

Improvements from previous rounds included increases in:

- permanent roads well drained with appropriate structures
- temporary roads stabilized
- rutting within allowable specifications on temporary roads
- controlling erosion on firebreaks during site pre activities

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BACKGROUND AND OBJECTIVES

The Clean Water Act (CWA), as reauthorized in 1987, called for states to establish a program for development and implementation of Best Management Practices (BMP) to reduce nonpoint source (NPS) water pollution. The Act also required states to develop methods for determining "BMP effectiveness," including a measure of BMP implementation.

The Texas Silvicultural Nonpoint Source Pollution Prevention Project, funded by a Fiscal Year 2018 CWA Section 319(h) grant from the Environmental Protection Agency (EPA) through the Texas State Soil and Water Conservation Board (TSSWCB), requires that a monitoring program be instituted to document the level of BMP implementation and effectiveness of BMPs in reducing NPS pollution from silvicultural activities. Objectives of the monitoring program are to:

- 1) Measure the degree of BMP implementation by forest landowners, silvicultural contractors, forest industry, and government agencies.
- 2) Evaluate the effectiveness of BMPs as applied in the field and identify any weaknesses in the BMP guidelines.

This report documents the findings of BMP implementation monitoring for 129 sites evaluated between October 6, 2021, and November 20, 2022, and represents the eleventh round conducted by Texas A&M Forest Service. Previous surveys were published in October 1992, March 1996, April 1998, September 2000, November 2002, October 2005, December 2008, December 2011, December 2015, and December 2018. These reports can be viewed online at http://tfsweb.tamu.edu/water.

DISTRIBUTION AND SELECTION OF IMPLEMENTATION MONITORING SITES

To obtain a valid estimate of overall implementation of forestry Best Management Practices, monitoring sites were distributed throughout East Texas and among all forestland ownership categories. Sites were believed to be representative of all silvicultural activities occurring across East Texas. The distribution of monitoring sites was based on the estimated annual timber harvest for each county as reported in the Texas A&M Forest Service publication *Texas Forest Resource Harvest Trends 2018*, and the average annual removals of growing stock by ownership class, as reported in a January 2019 query of the Forest Inventory EVALIDator web-application (https://apps.fs.usda.gov/fiadb-api/evalidator). See Table 1.

In order to obtain a sample of recently conducted silvicultural operations for implementation monitoring, satellite imagery was used at several points throughout the monitoring period, each time focusing on a different area in East Texas. The SouthFACT - Southern Forest Area Change Tool (www.southfact.com) detection process utilized the

shortwave infrared band of Landsat images, which is correlated to vegetation moisture. Large increases in shortwave infrared reflectance between two dates indicate silvicultural activity, so monitoring sites in a given period were identified by subtracting the shortwave infrared reflectance at the beginning of the period from the reflectance at the end of the period and mapping the difference. Over 900 operations were identified across East Texas, from which 129 sites were randomly selected to be monitored for this survey, using the distribution parameters outlined above.

Table 1. Distribution of Implementation Monitoring Sites by County.

County	Number of Sites Monitored
Anderson	1
Angelina	7
Bowie	2
Cass	7
Cherokee	7
Hardin	6
Harrison	6
Houston	4
Jasper	8
Liberty	1
Marion	1
Nacogdoches	7
Newton	11
Panola	3
Polk	11
Red River	2
Rusk	5
Sabine	5
San Augustine	8
San Jacinto	2
Shelby	5
Smith	1
Trinity	5
Tyler	8
Upshur	2
Walker	2
Wood	2
Total	129

QUALITY CONTROL

To eliminate bias, implementation monitoring sites were randomly selected from a pool of recent silvicultural operations identified through satellite detection. All monitoring evaluations were conducted by one or a combination of two trained foresters assigned to the TAMFS Water Resources Program. Using only program employees as inspectors provided greater accuracy and quality control. At the beginning of the monitoring project, as well as periodically throughout the survey, inspectors jointly evaluated sites to ensure consistency. All monitoring data was collected in accordance with a Quality Assurance Project Plan, approved by TSSWCB and EPA.

MONITORING CHECKLIST

The monitoring checklist that was used in Round 11 was also used for the previous seven surveys, a period dating back to 1999. This objective, 45-question form follows the *BMP Implementation Monitoring Framework*, a guidance document approved by the Southern Group of State Foresters to promote consistency among the southern states when conducting BMP implementation monitoring. The form is found in the Appendix.

The monitoring form evaluates BMPs for seven different categories: Permanent Roads, Temporary Roads/Skid Trails, Stream Crossings, Streamside Management Zones, Site Preparation, Landings, and Wetlands. Each question is worded so that a positive response is answered with a "Yes," while a negative response, indicating a departure from BMP recommendations, is answered "No." Questions that are not applicable to the site are answered "NA." Questions answered "No" are also evaluated to determine if a "significant risk" to water quality exists. A significant risk is an existing on-the-ground condition resulting from failure to correctly implement BMPs that, if left unmitigated, has already or will likely result in an adverse change in the chemical, physical, or biological condition of a water body. Such change may or may not violate water quality standards. Follow up questions are answered, when applicable or known, to determine trends associated with BMP implementation. A comments section at the end of the form provides additional information related to BMP implementation on the site.

Each site was scored with a value representing percent implementation. This score was computed by dividing the number of questions receiving a yes answer by the total number of applicable questions [Y/(Y+N)]. A qualitative assessment was also included in which sites were rated as *No Effort, Poor, Fair, Good,* or *Excellent*.

Site evaluations were entered into a database for storage and analysis. These data were also imported into a Geographic Information System (GIS) for further analysis and spatial representation.

INSPECTION CONTACTS

Landowners were contacted prior to inspecting the site so that permission for entry onto the property could be obtained. During this initial contact, the inspector explained the program, recorded information regarding the operation, and invited the landowner and his/her representative to join him on site during the evaluation. Sites were resampled if the landowner denied access. In nearly all cases on corporate and public forestland, a professional forester accompanied the inspector. Landowners, logging contractors, foresters, and timber buyers (where applicable and identifiable) were provided a copy of the completed checklist, along with a cover letter explaining the Water Resources program and instructions on interpreting the form.

RESULTS

Between October 6, 2020, and November 20, 2022, TAMFS Water Resources foresters evaluated BMP implementation on 129 sites, totaling 15,872 acres, throughout 27 counties in East Texas. These sites are spatially represented by ownership category in Figure 1. Tabulated results for each question on the BMP implementation monitoring checklist are located in the Appendix.

SITE CHARACTERISTICS

Fifty-seven of the 129 sites (44%) were on family forest lands. Sixty-seven sites (52%) were owned by corporate landowners. Five sites (4%) were on public lands.

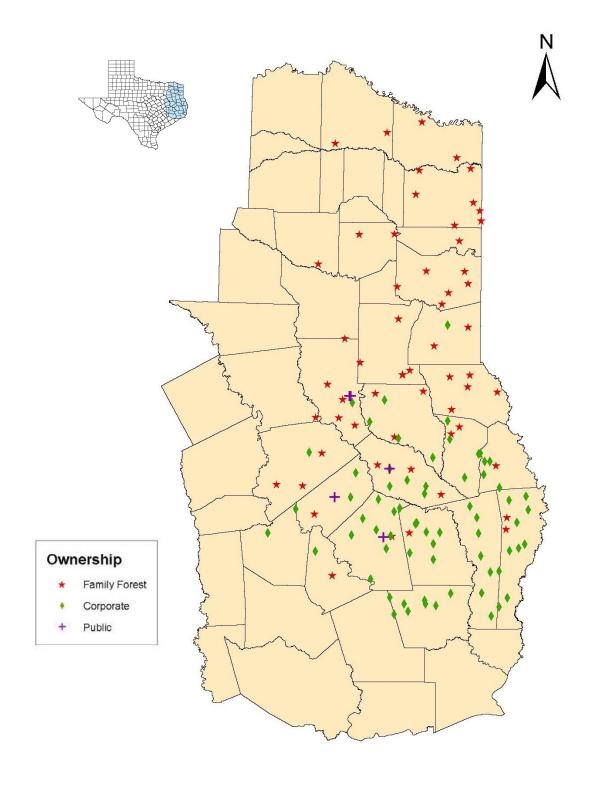
Seventy-three of the sites were monitored after a regeneration harvest. Twenty-five site preparation and/or plantings and 31 thinning operations were evaluated.

Professional foresters were involved in planning and/or administering the silvicultural operation on 109 (84%) of the sites. Private consultants were involved on 38 of the sites. On 64 sites, the forester was employed by corporations, while U.S. Forest Service and Texas A&M Forest Service foresters were involved on 7 sites.

Terrain classification was observed on the site and general soil erodibility was determined from the Natural Resources Conservation Service (NRCS) Soil Survey, if available, or estimated by the forester in the field. Seventy sites (54%) were on flat terrain. Fifty-eight sites (45%) were on hilly terrain and one (1%) was on steep terrain. Thirty sites (23%) were on soils with low erodibility, 91 sites (71%) on medium erodibility soils, and 8 (6%) were on high erodibility soils.

Of the 129 sites, 110 contained either a perennial (39) or intermittent (71) stream or both. A permanent water body was found within 800 feet of 57 sites (44%). Figure 1. Site Locations by Ownership Category.

Figure 1: Site Locations by Ownership Category.



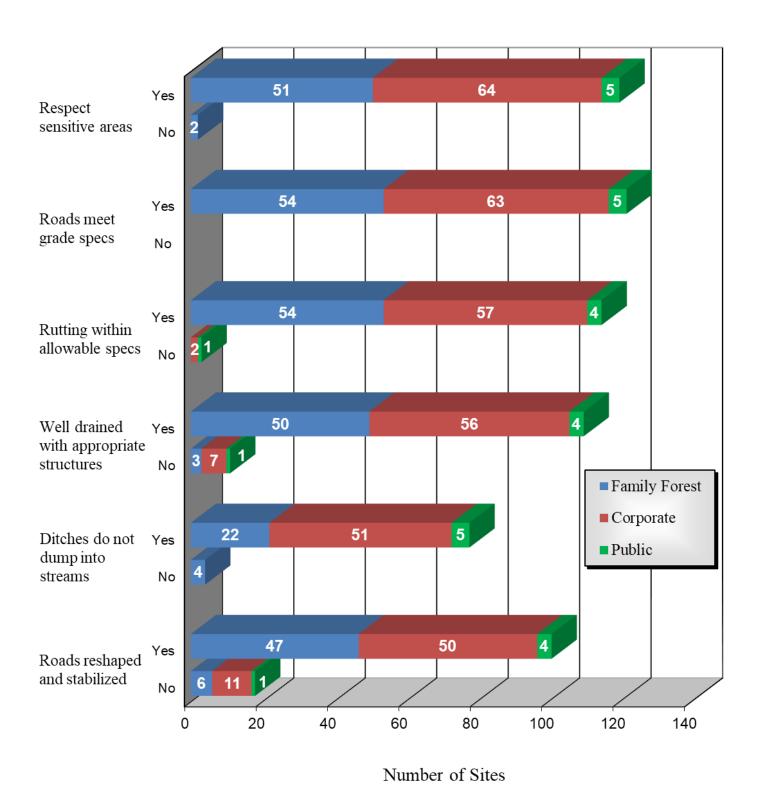
PERMANENT ROADS

Permanent roads were evaluated for BMP implementation when they were used in the forestry operation. Permanent roads in the forestry context are generally graded dirt roads that are used for year-round access. County roads were not included in the monitoring, as they are not under the management control of the landowner. Permanent roads were applicable on 122 of the 129 sites. The overall percent implementation for permanent roads was 93.6% with four significant risks. Within this category, the lowest score (84.9%) was for roads being reshaped and stabilized. The highest score was for roads meeting grade specifications (100%). See Table 2. Figure 2 breaks down the numbers of sites into ownership type.

Table 2. Implementation of BMPs Relating to Permanent Roads.

ВМР	Yes	No	N/A	% Implementation	Number of Significant Risks	Margin of Error
Respect sensitive areas	120	2	7	98.4	0	2.3
Roads meet grade specifications	122	0	7	100	0	-
Rutting within allowable specs	115	3	11	97.4	0	2.9
Well drained with appropriate structures	110	11	8	90.9	2	5.2
Ditches do not dump into streams	78	4	47	95.1	0	4.8
Roads reshaped and stabilized	101	18	10	84.9	2	6.6
Overall	555	38	90	93.6	4	2.0

Figure 2. BMP Implementation on Permanent Roads by Ownership Type.



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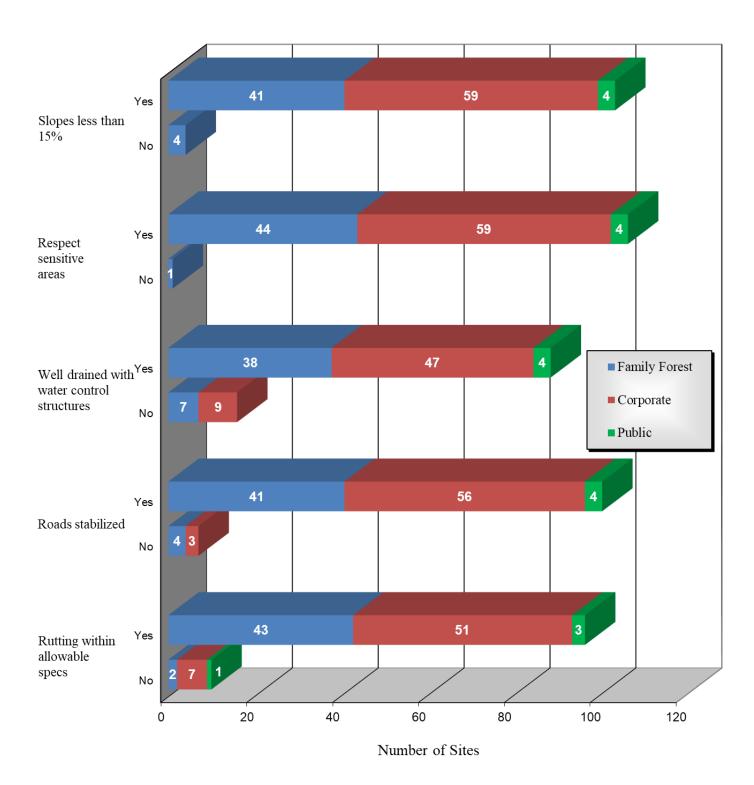
SKID TRAILS AND TEMPORARY ROADS

Skid trails and temporary roads were evaluated on 108 of the 129 monitoring sites. Skid trails are routes through the logging area in which logs are skidded or dragged to a central loading point called a "deck," "landing," or "set." Temporary roads are not designed to carry traffic long-term and are usually retired, closed, or reforested after the harvest activity. The overall percent implementation for temporary roads was 92.9% with four significant risks. Within this category, the lowest implementation score was for well drained with water control structures (84.8%). The highest score (99.1%) was for roads respecting sensitive areas. See Table 3 and Figure 3.

Table 3. Implementation of BMPs Relating to Skid Trails and Temporary Roads.

ВМР	Yes	No	N/A	% Implementation	Number of Significant Risks	Margin of Error
Slopes less than 15%	104	4	21	96.3	1	3.6
Respect sensitive areas	107	1	21	99.1	0	1.8
Well drained with water control structures	89	16	24	84.8	3	7.0
Roads stabilized	101	7	21	93.6	0	4.7
Rutting within allowable specifications	97	10	22	90.6	0	5.6
Overall	498	38	109	92.9	4	2.2

Figure 3. BMP Implementation on Skid Trails/Temporary Roads by Ownership Type.



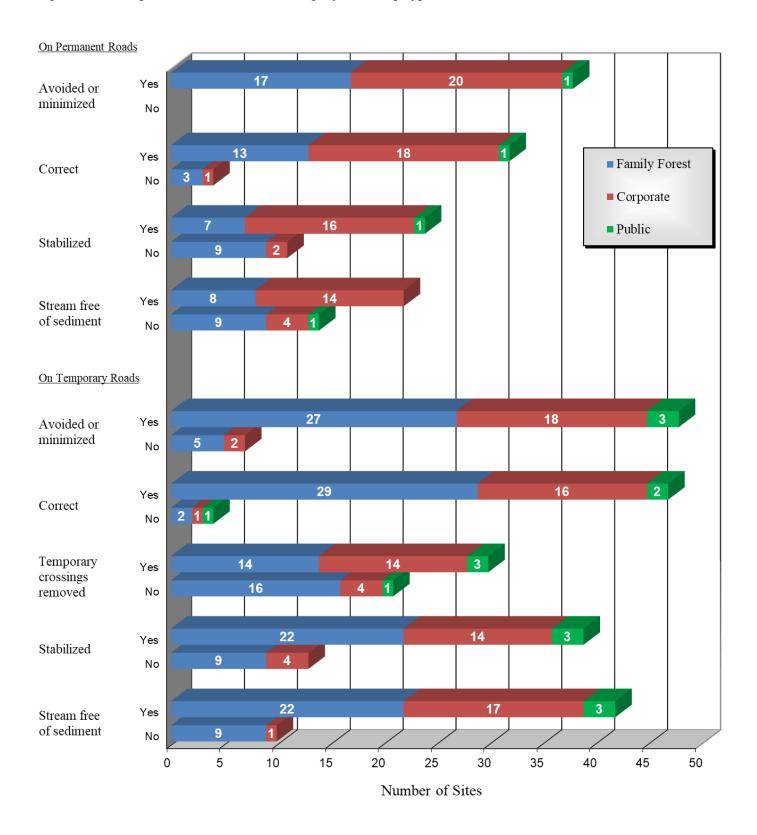
STREAM CROSSINGS

Stream crossings were evaluated on 47 sites. Twenty-two sites had crossings on permanent roads only, 33 had crossings on temporary roads only, and 14 had crossings on both permanent and temporary roads. The overall implementation for stream crossings was 79.3% with 17 significant risks. Within this category, the lowest implementation score for stream crossings on permanent roads was stream free of sediment (61.1%); the lowest score on temporary roads was at 58.8% for temporary crossings removed. The highest implementation scores on permanent roads were for avoiding unnecessary crossings (100%). For temporary roads, it was for correctly installing crossings (92.2%). See Table 4 and Figure 4.

Table 4. Implementation of BMPs Relating to Stream Crossings.

ВМР	Yes	No	N/A	% Implementation	Number of Significant Risks	Margin of Error
Permanent Roads						
Avoided or minimized	38	0	91	100	0	-
Correct	32	4	93	88.9	1	10.5
Stabilized	24	11	94	68.6	1	15.7
Stream free of sediment	22	14	93	61.1	2	16.3
Permanent Roads Total	116	29	371	80.0	4	6.6
Temporary Roads						
Avoided or minimized	48	7	74	87.3	1	9.0
Correct	47	4	78	92.2	1	7.5
Temporary crossings removed	30	21	78	58.8	4	13.8
Stabilized	39	13	77	75.0	4	12.0
Stream free of sediment	42	10	77	80.8	3	10.9
Temporary Roads Total	206	55	384	78.9	13	5.1
Overall	322	84	755	79.3	17	4.0

Figure 4. BMP Implementation on Stream Crossings by Ownership Type.



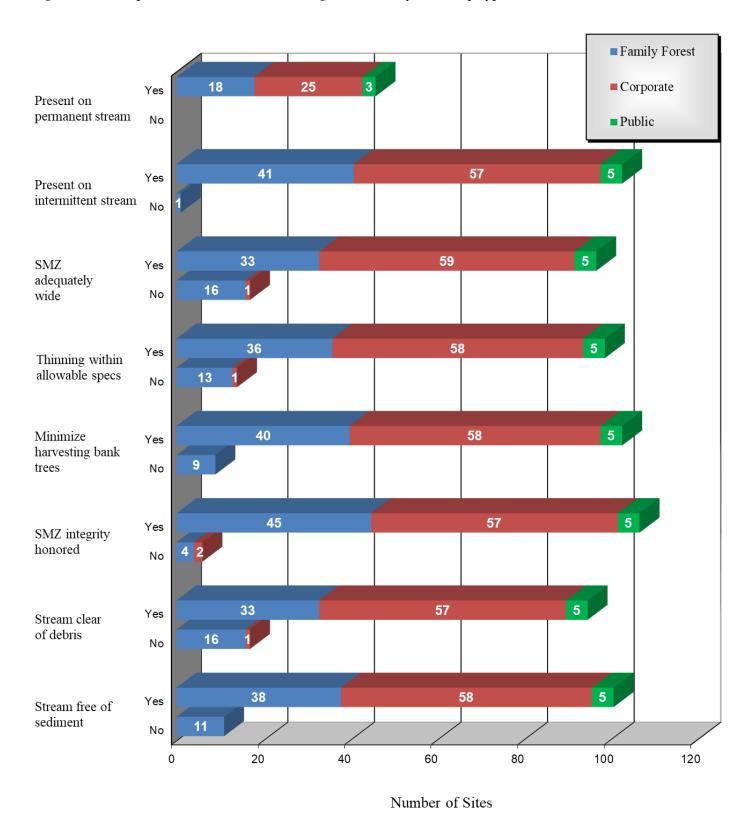
STREAMSIDE MANAGEMENT ZONES

Streamside management zones (SMZs) are recommended on all perennial and intermittent streams. All sites with either a perennial or intermittent stream were evaluated for the presence and adequacy of SMZs. Streams were present on 111 of the 129 sites. Of these 111 sites, 7 had perennial streams only, 65 had intermittent streams only, and 39 had both perennial and intermittent streams. The overall implementation for SMZs was 90.9% with seven significant risks. Within this category, the lowest implementation was for stream clear of sediment (84.8%), while the highest scores were for presence on perennial (100%) and intermittent (99.0%) streams, and SMZ integrity honored (94.7%). See Table 5 and Figure 5.

Table 5. Implementation of BMPs Relating to SMZs.

BMP	Yes	No	N/A	% Implementation	Number of Significant Risks	Margin of Error
Present on perennial stream	46	0	83	100	0	-
Present on intermittent stream	103	1	25	99.0	0	2.0
SMZ adequately wide	97	17	15	85.1	1	6.7
Thinning within specifications	99	14	16	87.6	1	6.2
Minimize harvesting bank trees	103	9	17	92.0	0	5.1
SMZ integrity honored	107	6	16	94.7	1	4.2
Stream clear of debris	95	17	17	84.8	0	6.8
Stream free of sediment	101	11	17	90.2	4	5.6
Overall	751	75	206	90.9	7	2.0

Figure 5. BMP Implementation on Streamside Management Zones by Ownership Type.



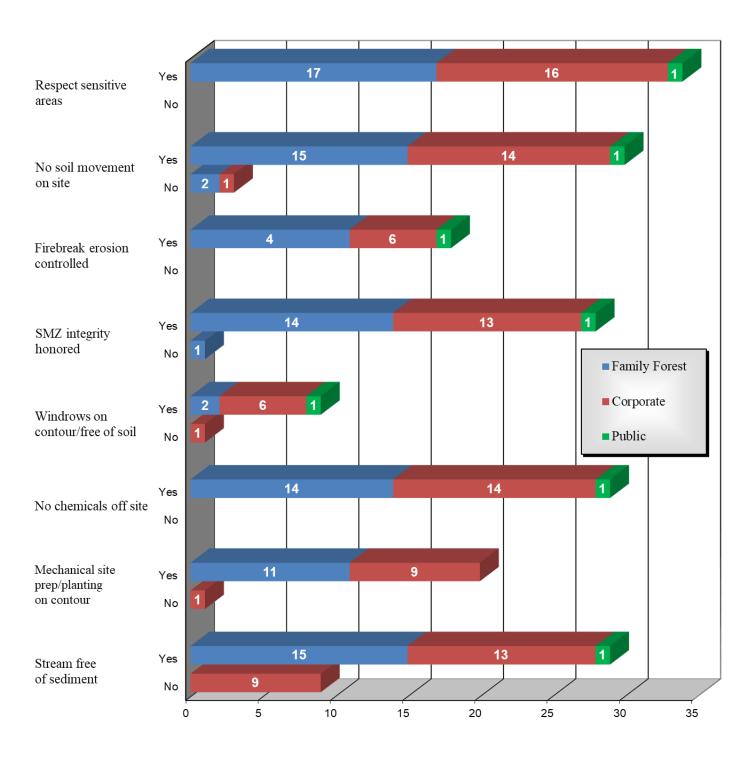
SITE PREPARATION

Thirty-four sites were evaluated for implementation of site preparation BMPs. A variety of site preparation techniques were evaluated, including some combination of herbicide, shearing, piling, subsoiling, bedding, burning, and planting. The overall implementation for site preparation was 97.0% with one significant risk. Within this category, four areas were found to have fully implemented BMPs (100%) – respect sensitive areas, firebreak erosion controlled, SMZ integrity honored, and stream free of sediment. The lowest implementation score was for windrows on contour/free of soil (90.0%). See Table 6 and Figure 6.

Table 6. Implementation of BMPs Relating to Site Preparation.

ВМР	Yes	No	N/A	% Implementation	Number of Significant Risks	Margin of Error
Respect sensitive areas	34	0	95	100	0	-
No soil movement on site	30	3	96	90.9	1	10.0
Firebreak erosion controlled	18	0	111	100	0	-
SMZ integrity honored	28	1	100	96.6	0	6.7
Windrows on contour/free of soil	9	1	119	90.0	0	19.0
No chemicals off site	29	0	100	100	0	-
Mechanical site prep/ planting on contour	20	1	108	95.2	0	9.3
Stream free of sediment	29	0	100	100	0	-
Overall	197	6	829	97.0	1	2.4

Figure 6. BMP Implementation on Site Preparation by Ownership Type.



Number of Sites

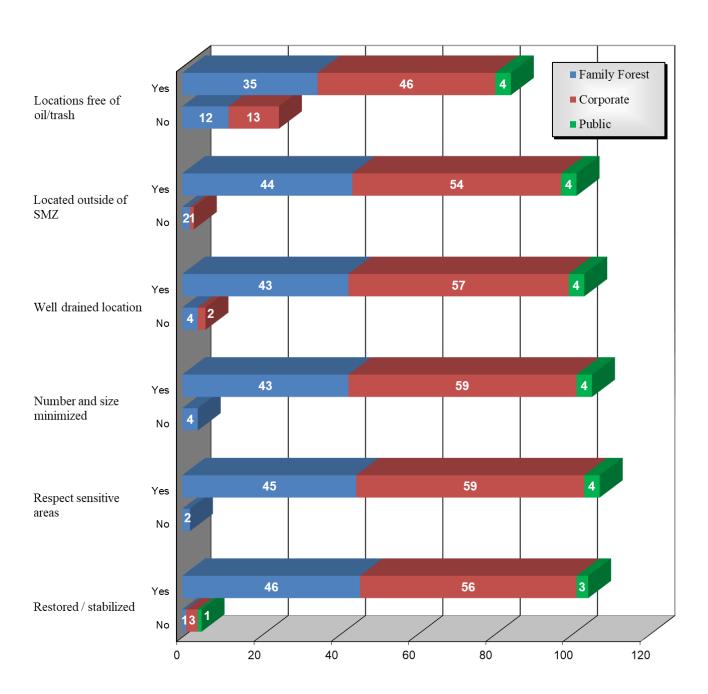
LANDINGS

Landings, sometimes called "decks" or "sets," are areas where logs are gathered, delimbed, bucked, and loaded onto trucks. Landings were evaluated on 110 sites with an overall implementation of 93.1% with no significant risks. Within this category, the highest implementation scores were for respecting sensitive areas (98.2%) and located outside of SMZs (97.1%). The lowest implementation score was for location free of oil/trash (77.3%). See Table 7 and Figure 7.

Table 7. Implementation of BMPs Relating to Landings.

BMP	Yes	No	N/A	% Implementation	Number of Significant Risks	Margin of Error
Location free of oil/trash	85	25	19	77.3	0	8.0
Located outside of SMZ	102	3	24	97.1	0	3.3
Well drained location	104	6	19	94.5	0	4.3
Number and size minimized	106	4	19	96.4	0	3.6
Respect sensitive areas	108	2	19	98.2	0	2.5
Restored/stabilized	105	5	19	95.5	0	4.0
Overall	610	45	119	93.1	0	2.0

Figure 7. BMP Implementation on Landings by Ownership Type.



Number of Sites

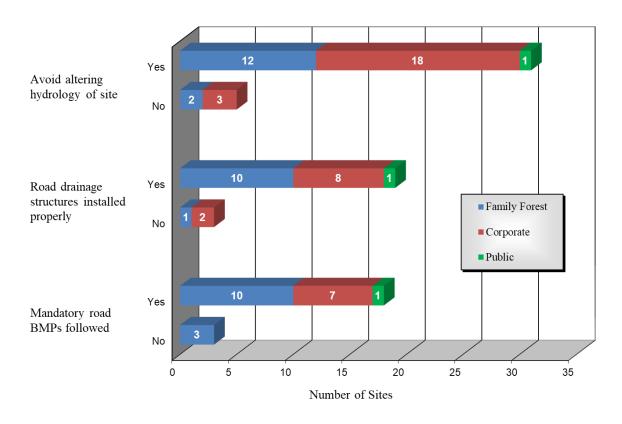
WETLANDS

Thirty-six sites had wetland or "wetland like" areas – not necessarily jurisdictional wetlands. These sites had an overall implementation of 87.2%. Five significant risks were noted. See Table 8 and Figure 8.

Table 8. Implementation of BMPs Relating to Wetlands.

BMP	Yes	No	N/A	% Implementation	Number of Significant Risks	Margin of Error
Avoid altering hydrology of site	31	5	93	86.1	2	11.5
Road drainage structures installed properly	19	2	108	90.5	1	12.8
Mandatory road BMPs followed	18	3	108	85.7	2	15.3
Overall	68	10	309	87.2	5	7.6

Figure 8. BMP Implementation on Wetlands by Ownership Type.



OVERALL BMP IMPLEMENTATION

To illustrate the range of the overall implementation scores, Figures 9 and 10 separate the results into five categories: 55-70%, 71-80%, 81-90%, 91-95%, and 96-100%. Figure 9 spatially illustrates implementation across all ownership types. Figure 10 demonstrates the distribution of sites by implementation score class and ownership type.

IMPLEMENTATION BY SITE CHARACTERISTICS

Ownership

BMP implementation varied by ownership type. The 67 corporate ownership sites had an overall implementation rate of 94.6% and four significant risks.

The five public sites had an overall implementation rate of 93.8% with no significant risks.

Family forest owners had an implementation rating of 87.6% with 34 significant risks over 57 sites.

Type of Activity

Three types of silvicultural activities were monitored: regeneration harvests, thinning, and site preparation/planting. See Table 9.

Table 9. Overall BMP Implementation by Type of Operation.

Type of Operation	BMP Implementation	
Regeneration harvest (clearcut) ¹	89.8%	
Thinning ²	94.2%	
Site preparation and/or planting ³	93.4%	

¹ Seventy-three total sites were considered for this implementation rate.

² Thirty-one total sites were considered for this implementation rate.

³ Twenty-five total sites were considered for this implementation rate.



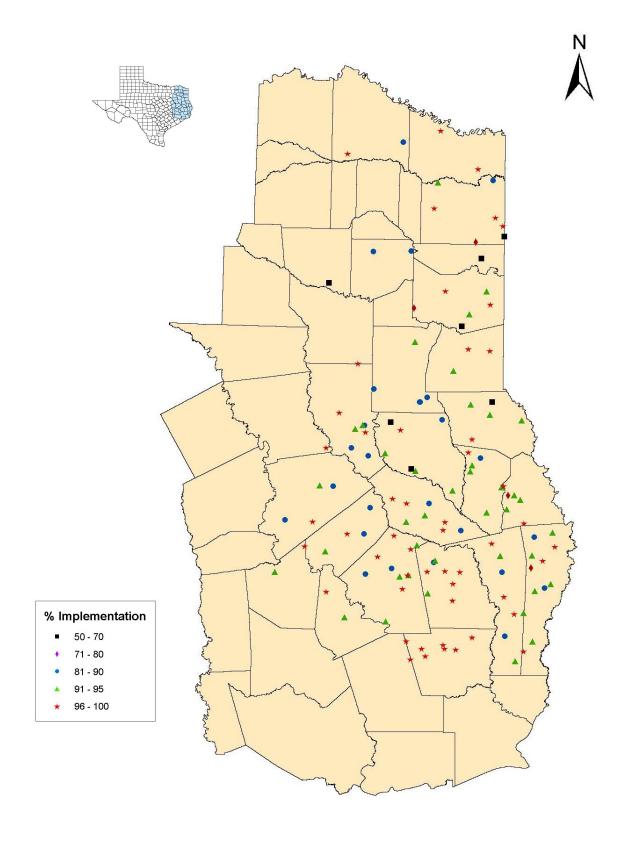
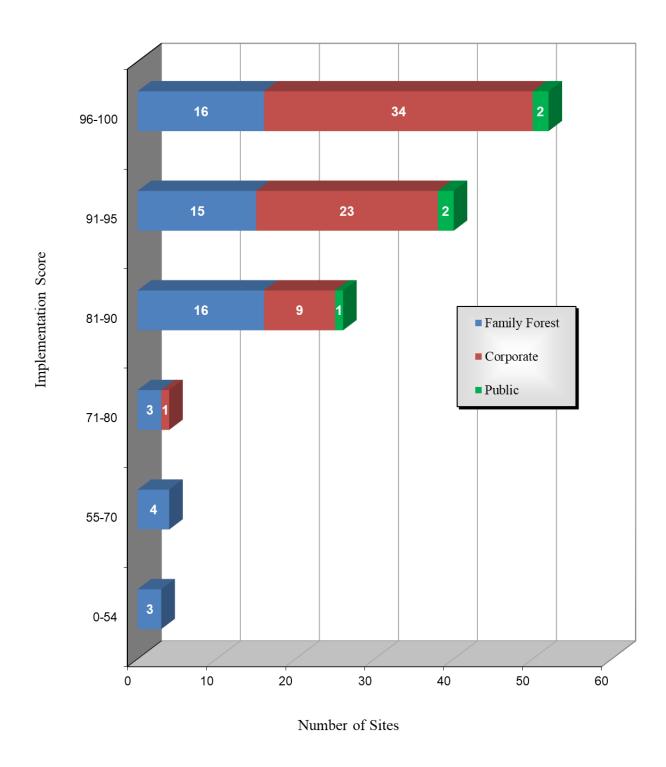


Figure 10. Overall Percent Implementation Scores by Number of Sites and Ownership.



Region

East Texas was divided into two regions, North and South, for easy comparison of BMP implementation rates. The line was drawn along the northern boundary of Leon, Houston, Angelina, San Augustine, and Sabine Counties. Seventy-eight sites were monitored in the southern region and had an implementation rating of 93.8%, while 51 sites were monitored in the northern region with an implementation rating of 88.0%. The higher BMP implementation in Southeast Texas is expected due to the high concentration of corporate and public ownership, flatter topography, and less erodible soils.

Terrain

Monitoring sites were classified as *Flat*, *Hilly*, or *Steep*. BMP implementation on the 70 flat sites was 93.9% with six significant risks; 88.6% with 32 significant risks on the 58 hilly sites; and 91.0% with no significant risks on the one steep site.

Erodibility

Monitoring sites were identified as having *Low*, *Medium*, or *High* soil erodibility. BMP implementation was 96.2% with one significant risk on a total of 30 low erodibility sites; 90.5% with 30 significant risks on 91 medium erodibility sites; and 85.8% with seven significant risks on eight high erodibility sites.

Distance to Permanent Water

Distance to the nearest permanent waterbody was determined for each monitoring site. BMP implementation on 27 sites with permanent water less than 300 feet away was 91.4% with 16 significant risks. BMP implementation was 90.7% with five significant risks on 30 sites with permanent water 300 to 800 feet away; 88.4% on 16 sites with eight significant risks with permanent water 800 to 1,600 feet away; and 92.9% with nine significant risks on the 56 sites in which permanent water was greater than 1,600 feet away.

River Basin

Monitoring sites were located in the following river basins: Cypress, Neches, Red, Sabine, San Jacinto, Sulphur, and Trinity. BMP implementation was highest in the Red River Basin (100%, 1 site) and lowest in the Cypress River Basin (87.1%, 11 sites). See Table 10 and Figure 11.

<u>Hydrologic Unit Code (Watershed)</u>

Monitoring sites were also assessed by their eight-digit hydrologic unit code (HUC). Twelve of the 17 watersheds (71%) scored 90% or over. The lowest rated watershed had a BMP implementation rating of 83.5% over four sites (11140306). See Table 11 and Figure 12.

Table 10. BMP Implementation by River Basin.

River Basin	Number of Sites	% Implementation	Significant Risks
Cypress	11	87.1	9
Neches	72	92.3	10
Red	1	100	0
Sabine	30	90.1	17
San Jacinto	2	96.0	0
Sulphur	5	93.0	2
Trinity	8	92.4	0

Table 11. BMP Implementation by 8-digit Hydrologic Unit Code.

Hydrologic Unit Code	Number of Sites	% Implementation	Significant Risks
11140106	1	100	0
11140302	5	93.0	2
11140304	4	87.5	6
11140305	1	90.0	0
11140306	4	83.5	2
11140307	2	92.0	1
12010002	9	86.7	11
12010004	7	88.0	4
12010005	14	91.9	3
12020001	3	94.3	0
12020002	21	92.6	4
12020003	9	94.6	0
12020004	9	90.1	3
12020005	16	88.5	2
12020006	9	98.1	0
12020007	3	98.7	0
12030202	12	92.9	0

Proximity to 303 (d) Listed Stream Segments

The proximity of BMP monitoring sites to 303(d) listed (impaired) stream segments was analyzed using GIS. Thirty-six sites were identified to be within one mile of a listed stream segment – one on public lands, 13 on private, and 22 on corporate properties. Average implementation score of these 36 sites is 93.6%. It should be noted that BMP implementation was higher near these listed waters than the overall BMP implementation (91.5) for all monitored sites. Forest operations provided greater water quality protection near these sensitive areas.

Figure 11. Site Location by River Basin.

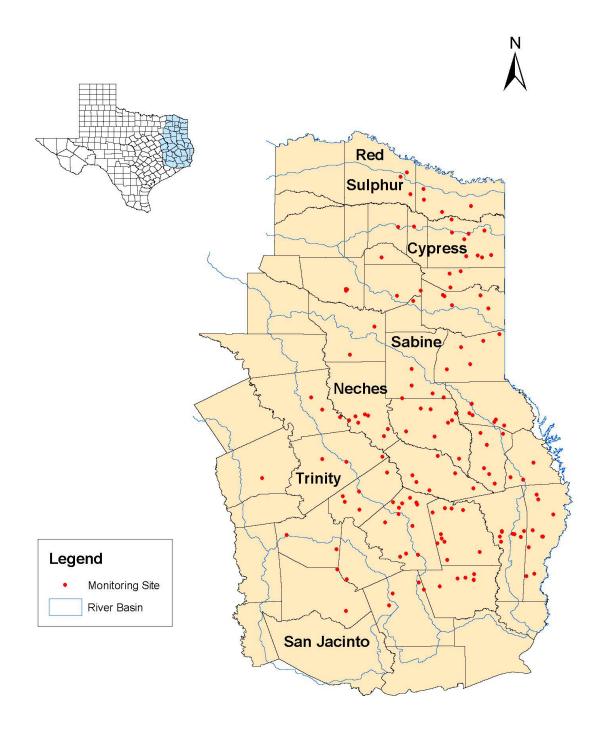
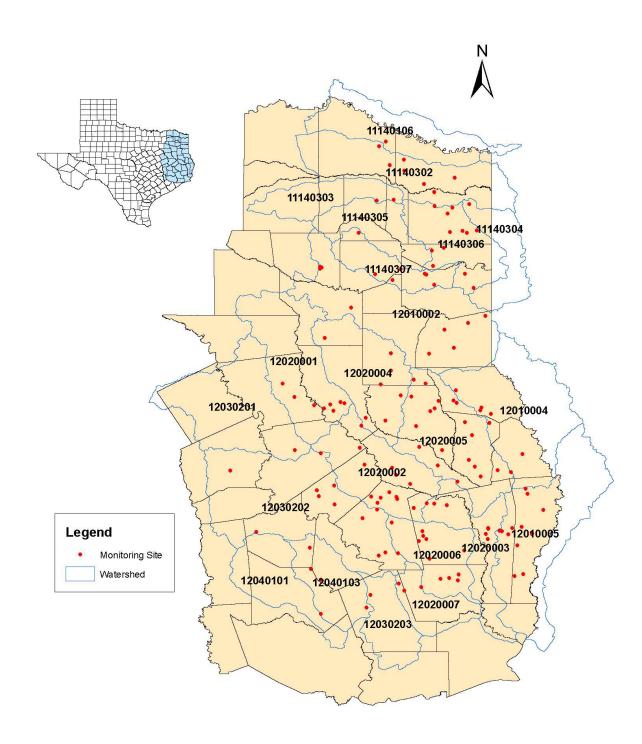


Figure 12. Site Location by Hydrologic Unit Code (Watershed).



STATISTICAL ANALYSIS

Statistical tests were performed to provide further information about the accuracy of the data collected. BMP trend analyses were also performed on certain categories to determine statistical significance. By understanding trends where lower BMP implementation occurred, Texas A&M Forest Service can develop outreach efforts that target these areas for improvement.

STATISTICAL TESTS

Margin of Error

The margin of error expresses the maximum likely difference observed between the sample mean and the true population mean with 95% probability. It is an important statistical calculation that was performed on all individual BMPs (i.e., SMZs present on perennial streams) using the respective percent implementation and total number of applicable questions. The formula used to calculate the margin of error is outlined below. See Tables 2-8.

$$m = 2\sqrt{\frac{P(100-P)}{n}}$$

Where m = margin of error for a single BMP

P = the percent implementation for a single BMP

n = the number of sites on which the BMP was evaluated

Confidence Interval

The 95% confidence interval is a tool that statisticians use to demonstrate their confidence in the measured mean of a sample. It provides a range for which they are 95% confident (i.e., 19 times out of 20) that the actual mean will be found. To calculate the confidence interval, the mean, variance, standard deviation, standard error, and margin of error must also be calculated. The formula used to calculate the confidence interval is listed below. For Round 10, the 95% confidence interval for the overall BMP implementation across all sites was (92.6, 95.1).

95%
$$CI = Mean \pm Margin of Error$$

STATISTICAL SIGNIFICANCE OF BMP TRENDS

Statistical analyses were performed on the following categories:

- Forester Involved in Sale or Activity
- Logging Contractor Attended BMP Training
- Landowner Familiar with BMPs
- BMPs Included in the Timber Sale Contract
- Timber Delivered to SFI® Mill
- Landowner Has a Forest Management Plan

Since the data were not normally distributed, a non-parametric test (Wilcoxon) was performed. To determine statistical significance, the resulting P value was compared to the level of significance. The P value is the probability of observing a value of the test statistic as contradictory (or more) to the null hypothesis as the computed value of the test statistic. In these tests, a 0.05 (5%) level of significance was used. For the two implementation ratings to be significantly different, the P value must be lower than the level of significance. The implementation ratings for the "yes" and the "no" answers were calculated to be significantly different in four of the categories. See Table 12.

Table 12. Results of Statistical Tests Determining Statistically Significant Differences.

	% Implementation Yes No		Non-Parametric <i>P</i> value	Level of Significance	Statistically Different?
Forester Involved	92.7	81.9	0.001	0.05	YES
Logger Trained	91.7	88.2	0.117	0.05	NO
Landowner Familiar	92.6	85.6	0.010	0.05	YES
BMPs in Contract	92.5	84.8	0.029	0.05	YES
SFI® Mill	92.0	82.0	0.004	0.05	YES
Management Plan	91.8	89.5	0.279	0.05	NO

Forester Involved in the Sale or Activity

BMP implementation was higher when a professional forester was involved in the sale or activity. One hundred fifteen sites were identified as having a professional forester involved and had an implementation rating of 92.7%. Sites in which there was no forester involvement had a BMP implementation rating of 81.9%. See Figure 13.

Logging Contractor Attended BMP Workshop

Texas A&M Forest Service conducts BMP training workshops for logging contractors. One hundred twenty-three inspections identified the logging contractor as having attended the formal BMP training, with an implementation of 91.7%. Sites in which the activities were administered by a logger that did not attend the formal BMP training had an implementation rating of 88.2%. See Figure 13.

Landowner Familiar with BMPs

Sites whose owners were not familiar with BMPs (20) had an overall implementation rating of 85.6%, while sites whose owners were familiar with BMPs (109) had an implementation rating of 92.6%. It is important to note that the majority of the landowners monitored were familiar with BMPs and their implementation rates were higher, demonstrating the extended reach of the forest sector's educational efforts. See Figure 13.

BMPs Included in the Timber Sale Contract

BMPs were included in the timber sale contract on 113 sites. Implementation on sites with BMPs in the contract was 92.5%, while implementation on sites without BMPs in the contract was 84.8%. See Figure 14.

Timber Delivered to SFI® Mill

Sites in which the receiving mill was known to be a $SFI^{\mathbb{R}}$ member (123) had an implementation rating of 92.0%, compared to an 82.0% rating on the six sites in which the timber went to other mills. See Figure 14.

Landowner Has a Forest Management Plan

On the 113 sites in which landowners had a forest management plan, implementation was 91.8%, compared to an implementation rating of 89.5% on the 16 sites that did not have a forest management plan. See Figure 14.

Figure 13. Overall Implementation by Various Types of Involvement.

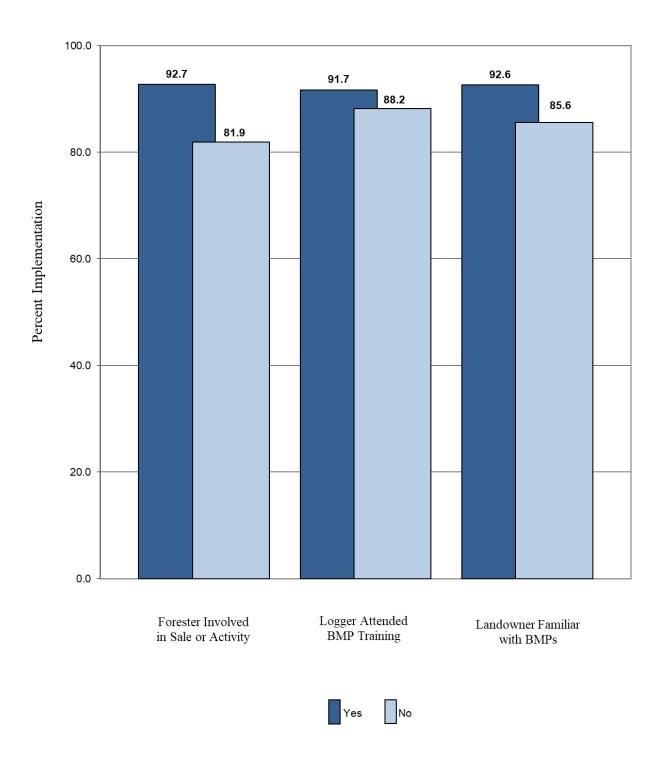
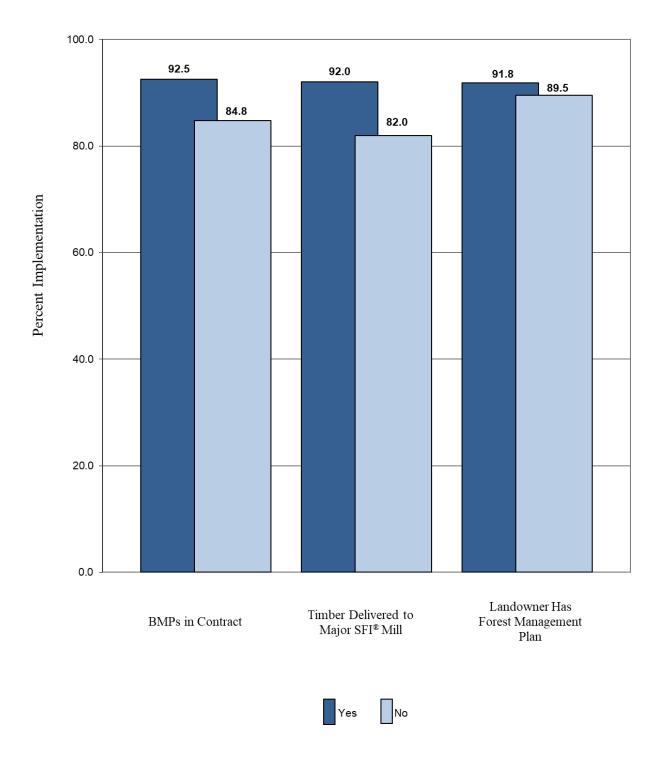


Figure 14. Overall Implementation by Various Categories.



DISCUSSION

As mentioned in the monitoring checklist section of this report, the current methodology used to monitor BMP implementation has been in place since 1999. Prior to that, a more subjective approach was used in which sites were scored as *No Effort, Poor, Fair, Good, or Excellent*. In order to determine percent implementation for an individual site under this older method, passing sites (*Fair, Good, or Excellent*) scored 100%, while failing sites (*No Effort, Poor*) scored 0%.

The current objective method more accurately scores percent implementation. Individual sites are rated on a 0 - 100 percent scale based on their actual level of BMP implementation. Due to the change in reporting methods, results from Rounds 4 - 10 *cannot* be directly compared to Rounds 1 - 3. However, site evaluations conducted in Rounds 1 - 3 were scored using the current method in the Texas A&M Forest Service report, *A History of BMP Implementation Monitoring in Texas, 2007*, to facilitate this comparison.

A brief discussion of the previous rounds of monitoring is provided to give a historical perspective on BMP monitoring in Texas.

OVERALL IMPLEMENTATION – Rounds 1 through 10

Overall BMP implementation on forest operations in East Texas has shown tremendous improvement since the first round of monitoring was completed in 1992 (Figure 15). Implementation on public and industrial sites has shown steady improvement over the previous nine rounds. Implementation on industry lands dropped slightly in Round 7; however, only 8 industry sites were included in that round as compared to an average of 50 sites in the previous six rounds. This is reflective of the divestiture of industrial forestlands that began prior to 2005, which resulted in a shift in ownership type. Implementation on industry lands in Round 8 rebounded to 97.7%, an all-time high for this landowner type, though no industrial tracts were monitored in the last two rounds. The corporate category was established in Round 6 in response to these changes in ownership and has demonstrated a high, steady rate of implementation over the last four rounds. Of the four ownership categories, family forest owners have shown the most remarkable progress in BMP implementation, improving from 69.8% in Round 1 to 88.0% or more in the latest five rounds.

OVERALL IMPLEMENTATION – Round 11

BMP implementation on public land for Round 11 was 93.8% with no significant risks to water quality identified. Implementation on corporate land during this time period was 94.6% with four significant risks. Family forest owners received an implementation rating of 87.6% with 34 significant risks. This resulted in an overall BMP implementation rating of 91.5% with a total of 38 significant risks across all ownership categories. See Table 13 and Figure 15.

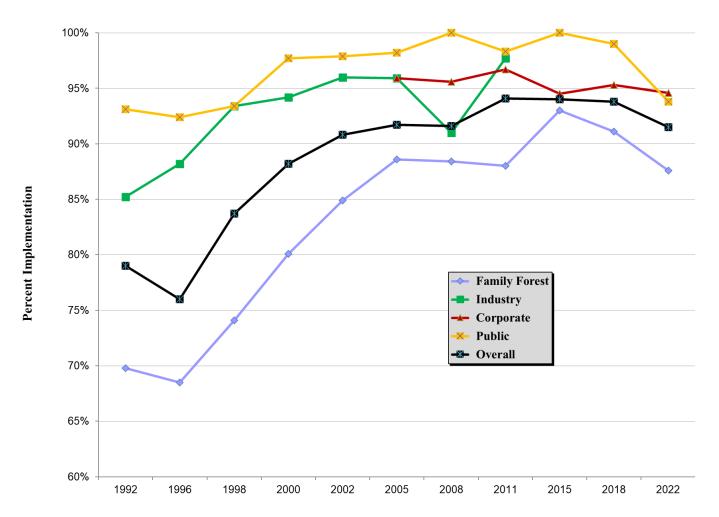
Starting in Round 9, BMP implementation on family forest owners finally reached similar levels (90%⁺) as the other ownership categories. While family forest owners are generally less involved in forest management, only infrequently sell timber, may be absentee, and may lack technical knowledge necessary to implement BMPs, the education and outreach efforts of Texas A&M Forest Service and cooperators are starting to be realized.

Table 13. Percent Implementation by Ownership and Round.

	Family Forest	Corporate	Industry	Public	Overall
*Round 1 (1992)	69.8	-	85.2	93.1	79.0
*Round 2 (1996)	68.5	-	88.2	92.4	76.0
*Round 3 (1998)	74.1	-	93.4	93.4	83.7
Round 4 (2000)	80.1	-	94.2	97.7	88.2
Round 5 (2002)	84.9	-	96.0	97.9	90.8
Round 6 (2005)	88.6	95.9	95.9	98.2	91.7
Round 7 (2008)	88.4	95.6	91.0	100	91.6
Round 8 (2011)	88.0	96.7	97.7	98.3	94.1
Round 9 (2015)	93.0	94.5	-	100	94.0
Round 10 (2018)	91.1	95.3	-	99.0	93.8
Round 11 (2022)	87.6	94.6	-	93.8	91.5

^{*}Data from these rounds follow the current methodology used to determine BMP implementation

Figure 15. Percent Implementation by Ownership and Round.



AREA WEIGHTED BMP IMPLEMENTATION

Traditionally, monitoring sites have been weighted equally when determining percent implementation scores. This method is good for determining overall BMP implementation across the state or for a particular landowner category. However, it does not provide this information on a landscape scale like the area weighted BMP implementation method. Using this approach, larger sites are weighted more heavily than smaller sites, primarily because they have a greater opportunity to impact water quality. The results of this monitoring round were reanalyzed using the area weighted approach. BMP implementation scores remained close to the original scores for all three landowner types and overall, though overall score was slightly higher. See Table 14.

AW % = Σ (((Site A/Total A) *100)) * % BMP)))

Where AW % = area weighted BMP implementation %A = area (acres)

% BMP = individual site % BMP implementation

Table 14. Area Weighted Percent Implementation by Ownership, Round 11.

Landowner Type	Area Weighted % Implementation
Family Forest Owner	88.5
Corporate	94.2
Public	92.9
Overall	92.2

CONCLUSION

Positive statistical correlations between forester involvement, landowner familiarity, and inclusion of BMPs in harvesting contracts were shown. This demonstrates the importance for family forest owners to involve a forester, include BMPs in any land management contract, and familiarize themselves in forestry BMPS to ensure BMP implementation.

Large corporate landowners played a significant role in keeping BMP implementation scores high. This occurred primarily from their support of the Texas A&M Forest Service Water Resources Program and participation in forest certification programs. Water quality protection is obviously a top priority for this sector, as evident by requiring all contractors to attend BMP training workshops and including BMPs in their timber sale contracts.

Overall BMP implementation (91.5%) is a few points below the last three rounds. Though scores from all three ownerships are slightly lower this round, the corporate score showed the least amount of change. Still, the project's education efforts aid in sustaining high scores and should be continued to keep BMPs in the forefront and improve implementation even more.

Although BMP implementation remained high, there is still room for improvement. This round of monitoring noted a deficiency in stabilizing stream crossings on permanent and temporary roads. Removing temporary crossings still needs improvement, along with keeping sediment and debris out of streams. Texas A&M Forest Service continues to target these areas. Focused BMP training workshops on forest roads and stream crossings have been conducted, with more planned in 2023.

The online, GIS pre-harvest planning application, *Plan My Land Operation*, was released by TAMFS in May 2015 to further increase implementation by helping loggers and foresters plan for BMPs prior to an operation. The following year, TAMFS developed *Texas Forestry BMPs*, a native smartphone application of the Texas Forestry Best Management Practices Handbook. This app has been uploaded almost 900 times in the last four years. Continuing effective educational programs for family forest owners, providing technical assistance on BMPs to the forestry community, and conducting BMP training for loggers will continue to minimize the potential water quality impacts from silvicultural operations in Texas.

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Appendix

Implementation Monitoring Checklist

Evaluation Criteria

Summary of Results

Evaluation Criteria for BMP Monitoring Checklist

I. General Landowner and Site Information

County: Texas County inspection was located.

TFS Block and Grid: Enter only entry point if multiple blocks or grids.

Region: TFS Water Resources Region (N or S)

Latitude and Longitude: coordinates in decimal degree (D.d) format.

Forester Type: Professional, i.e. consultant, industry, etc.

Forester Name: First and last name.

Timber Buyer: First and last name or Corporation name.

Contractor: First and last name or business name.

Activity: Type activity occurring, e.g. harvesting, site preparation, etc.

Acres Affected: Acres affected by activity.

Estimated Date of Activity: Quarter and year activity appears to have occurred.

Date of inspection: mmddyy.

Inspector: Name of TFS forester doing BMP inspection.

Accompanied by: Name of landowner, forester, logger, etc. who is present during the

inspection.

Owner Type: Nonindustrial (N), Absentee nonindustrial (A), Corporate (C) Industry (I),

Public (P).

Name, Address, City, Zip, and Phone: Contacts for the landowner.

II. Site Characteristics

Terrain: Check only one; Flat, Hilly, or Steep.

Erodibility hazard: Check only one; Low, Medium, or High.

Type stream present: Perennial or Intermittent.

Watershed Code: 8 digit hydrologic unit code where site is located.

River Basin: River basin where site is located.

Distance to nearest permanent water body: Distance to nearest blue line stream or lake.

Predominant soil series: Series name from Soil Survey data (if available).

Predominant soil texture: Check only one; Clay, Clay Loam, Loam, Sandy Loam, or Sand.

III. Permanent Roads

- 1. Respect sensitive areas: Do roads avoid wet areas, SMZs, steep slopes if an alternative exist, erosion prone areas if an alternative exists, etc.?
- 2. Roads meet grade specs: Pertains to new roads or roads which are substantially reworked. Are roads within 2-10 percent grade except for short distances? Are roads on contour?
- 3. Rutting within allowable specs: Is the road free of ruts in excess of 6 inches deep for more than 50 feet?
- 4. Well drained with appropriate structures: Are roads constructed so that water will quickly drain from them to minimize soil movement?
- 5. Ditches do not dump into streams: Are water turn outs and water bars venting far enough from the stream to prevent sediment from entering the stream channel?

6. Roads reshaped and stabilized: If needed, are roads reworked to minimize soil movement?

BMPs present: Which types of BMPs were used? Rolling dips (RD), Wing ditches (WD), Water bars (WB), Revegetate (RE), On contour (OC), Proper placement (PL), Reshaping (RS), Culverts (CU), Side Ditch (SD), Broad based dip (BD).

IV. Temporary Roads/ Skid Trails

- 1. Respect sensitive areas: Do skid trails and temporary roads avoid wet areas, SMZs, steep slopes if an alternative exist, erosion prone areas if an alternative exists, etc.?
- 2. Slopes less than 15 %: Are skid trails laid out on or near contour, rather than up and down steep slopes?
- 3. Rutting within allowable specs: Are skid trails and temporary roads free of ruts in excess of 6 inches deep for more than 50 feet?
- 4. Roads well drained with water bars or other water control structures: Were BMPs installed effectively to reduce erosion from the road?
- 5. Roads stabilized: If needed, are skid trails and temporary roads reworked to minimize soil movement?

BMPs present: See Section III above. Logging Slash (LS).

V. Stream Crossings

On Permanent Roads:

- 1. Crossings avoided or minimized: Was an effort made to use as few crossings as possible?
- 2. Stream crossings correct: Are crossings installed correctly? Are crossing located properly? Are culverts properly sized? Are bridges used where necessary? Are crossings at right angles?
- 3. Stream crossings stabilized? Are stream banks and approaches stabilized? Are washouts evident?
- 4. Stream free of sediment: Has sedimentation from the road into the stream channel been minimized?

On Temporary Roads

- 5. Crossings avoided or minimized: Was an effort made to use as few crossings as possible?
- 6. Stream crossings correct: Are crossings installed correctly? Is the crossing located so as to minimize the potential erosion in the stream channel? Is the crossing at a right angle to the stream channel? Was a proper stream crossing method used?
- 7. Temporary crossings removed: Have the temporary crossings been removed? Excess fill removed from the stream channel
- 8. Stream crossings stabilized: Banks and approaches stabilized against erosion? Are washouts evident?
- 9. Stream free of sediment: Has sedimentation from the road into the stream channel been minimized?

BMPs present: Which types of BMPs were used? Culverts (CU), Bridge (BR), Low water crossing (LW).

VI. Streamside Management Zones

- 1. Present on permanent stream: Is there an SMZ present on any permanent stream?
- 2. Present on intermittent stream: Is there an SMZ present on any intermittent stream?
- 3. SMZ adequately wide: Is the stream being protected from erosion and deposition of sediment? Does the width meet the guidelines recommendations?
- 4. Thinning within allowable specs: If thinning was done, is the basal area remaining at least 50 square feet? Is there minimal soil disturbance from felling and skidding?
- 5. Minimize harvesting bank trees: Was an effort made to minimize harvesting bank trees? Were trees felled across the stream?
- 6. SMZ integrity honored: Was an effort made to stay out of the SMZ with skidders, landings, roads, etc. (except for designated stream crossings)? Is the SMZ free of firebreaks?
- 7. Stream clear of debris: Are tops and limbs removed from permanent and intermittent stream channels? Has any brush or debris pushed into the stream channel been removed?
- 8. Stream free of sediment: Has sedimentation reaching the stream channel through the SMZ been minimized?

VII. Site Preparation

Site preparation method: Mechanical, chemical, prescribed burn. Regeneration method: Mechanical, Hand, Natural.

- 1. Respect sensitive areas. Effort to prevent site prep intrusion into sensitive areas? Effort to prevent heavy equipment intrusion into sensitive areas? Effort to prevent fire intrusion into sensitive areas?
- 2. No soil movement on site: Is there no soil movement on site? Are rills or gullies prevented? Is there no problem with broad scale sheet erosion?
- 3. Firebreak erosion controlled: If present, has potential erosion from firebreaks been minimized as per guideline recommendations?
- 4. SMZ integrity honored: Effort to prevent site prep intrusion into the SMZ? Effort to prevent heavy equipment intrusion into the SMZ? Effort to prevent fire intrusion into the SMZ? Are perennial or intermittent streams free of debris?
- 5. Windrows on contour / free of soil: Are windrows on contour on hilly lands rather than up and down slopes? Was soil disturbance minimized? Was soil in windrows minimized?
- 6. No chemicals off site: Does it appear that chemicals were used according to label directions? Have they remained on site and out of water bodies?
- 7. Mechanical site prep and machine planting on contour: Are rows on contour on hilly lands rather than up and down slopes?
- 8. Stream free of sediment: Has sedimentation reaching the stream channel because of site prep activities been minimized?

VIII. Landings

- 1. Locations free of oil/trash: Any sign of deliberate oil spills on soil? Is trash picked up and properly disposed of?
- 2. Located outside of SMZ: Was the landing located 50 feet outside SMZ so as to minimize traffic and erosion in the SMZ?
- 3. Well drained location: Were the landings located so as to minimize puddling, soil degradation and soil movement?
- 4. Number and size minimized: Were the number and size of landings kept to a minimum?
- 5. Respect sensitive areas: Were landings kept out of wet areas, steep slopes, and other erosion prone areas if an alternative exist?
- 6. Restored/stabilized: Has the landing been back bladed or otherwise restored as per guideline recommendations? Has erosion been minimized through spreading bark, etc., seeding, water bars, or other recommended BMP practices?

IX. Wetlands (may or may not be jurisdictional)

- 1. Avoid altering hydrology of site: Were ruts and soil compaction kept to a minimum?
- 2. Road drainage structures installed properly: Were BMPs installed effectively to maintain the flow of water and keep erosion to a minimum in the wetland?
- 3. Mandatory road BMPs followed: Were the 15 federal mandatory BMPs followed?

X. Overall Implementation

Section implementation percentages are determined by dividing the number of questions receiving a yes answer by the total applicable questions in each section. Y/(Y+N)

Overall implementation is determined in a similar manner using the totals from all sections combined. Y/(Y+N)

Significant Risk. A significant risk is an existing on-the-ground condition resulting from failure to correctly implement BMPs, that if left unmitigated will likely result in an adverse change in the chemical, physical or biological condition of a waterbody. Such change may or may not violate water quality standards.

Subjective Score.

No Effort Substantial erosion as a result of operations. Sedimentation in streams.

Temporary stream crossings not removed. No SMZ when needed, etc. Poor

attitude evident about the job.

Poor: Some effort at installing BMPs. Generally poor quality construction or no effort

in certain locations which suffer from erosion, stream sedimentation, etc. Substantial lack of BMPs in a particular emphasis such as roads, skid trails or

SMZ.

Fair: (1) Generally a pretty good effort at BMPs. Poor application procedures

perhaps. Lack of BMPs in a particular emphasis but with moderate

consequences. (2) No BMPs on a site which requires few BMPs but has some resultant minor problems.

Good:

(1) BMPs generally installed correctly. Guidelines generally followed. Allows for some failures of BMP devices or failure to observe guidelines but with light consequences. (2) Good quality job which required no BMPs and has few problems.

Excellent: (1) BMPs installed correctly. Guidelines followed. (2) Some BMPs implemented even when they might not have been required. Few if any problems exist.

Follow up Questions

Was activity supervised by a professional forester or representative? Check Yes, No, or NA Who? If yes, list name of individual.

Was landowner familiar with BMPs? Check Yes, No, or NA.

Has logger attended BMP workshop? Check Yes, No, or NA

Were BMPs included in the contract? Check Yes, No, or NA

Is landowner a member of TFA? Landowner Association? Other? Check Yes, No, or NA Organization: If yes, list name of organization.

Was timber delivered to SFI mill? Check Yes, No, or NA

Does landowner have a forest management plan? Check Yes, No, or NA

Is remediation planned by the landowner? Check Yes, No, or NA.

Date: If yes, include date of planned remediation.

I. General Lando	wner and Tract In	formation						
Owner type		Forester type			<u>Activity</u>			
Family Forest Own	ner 22	Corporate	68		Regeneration	on Harvest		
Absentee	35	Private Consultant	40		Clearcut		73	
Corporate	67	Public	7		Thin		31	
Public (Fed, State)	5				Site Prep &	or planting/	25	
II. Site Character	ristics				Type strear	n present		
<u>Terrain</u>		Erodibility hazard						
Flot	70	Law	20		Perennial Intermittent	7		
Flat Hilly	70 58	Low Medium	30 91		Both	65 39		
Steep	1	High	8		None	18		
•		-	Ü					
Distance to neares	st permanent water	<u>body</u>			<u>Predominar</u>		s/texture	
< 300'	27				Clay	_1	Sandy loam	
300 - 800'	30				Clay loam	6	Sand	10
800 - 1600'	16				Loam	11		
1600' +	56							
III. Permanent Ro	oads	122 applicable						
			<u>Yes</u>	<u>No</u>	<u>NA</u>	Sig. Risk		
 Respect sensiti 	ve areas		120	2	7	0		
Roads meet gra	•		122	0	7	0		
3. Rutting within a	•		115	3	11	0		
	th appropriate struc	tures	110	11	8	2		
5. Ditches do not of6. Roads reshape	•		78 101	4 18	47 10	0 2		
o. Houdo rosnapo	a and olabilized		101	.0	.0	_		
IV. Skid Trails/Te	mporary Roads	108 applicable						
			<u>Yes</u>	<u>No</u>	<u>NA</u>	Sig. Risk		
1. Slopes less tha			104	4	21	1		
2. Respect sensiti		had atminitions	107	1	21	0		
Roads well drai Roads stabilize	ned with water conf	iroi siruciures	89 101	16 7	24 21	3 0		
5. Rutting within a			97	10	22	0		
V. Stream Cross On Permanent Roa		36 applicable	<u>Yes</u>	No	NΔ	Sig. Risk		
Crossings Avoid		ου αμγιισανίο	38	<u>No</u> 0	<u>NA</u> 91	0 0		
Stream crossing			32	4	93	1		
Stream crossing			24	11	94	1		
4. Stream free of s	_		22	14	93	2		
On Temporary Roa	ads_	47 applicable						
5. Crossings avoid	ded or minimized		48	7	74	1		
6. Stream crossing	gs correct		47	4	78	1		
7. Temporary cros			30	21	78	4		
	gs and approaches	stabilized	39	13	77	4		
9. Stream free of s	sediment		42	10	77	3		

VI. Streamside Management Zones 111 applicable				
The applicable	<u>Yes</u>	<u>No</u>	<u>NA</u>	Sig. Risk
Present on permanent stream	46	0	83	0
2. Present on intermittent stream	103	1	25	0
3. SMZ adequately wide	97	17	15	1
4. Thinning within allowable specs	99	14	16	1
5. Minimize harvesting bank trees	103	9	17	0
6. SMZ integrity honored	107	6	16	1
7. Stream clear of debris	95	17	17	0
8. Stream free of sediment	101	11	17	4
VII. Site Preparation 34 applicable				0: 5: 1
	<u>Yes</u>	<u>No</u>	<u>NA</u>	<u>Sig. Risk</u>
Respect sensitive areas	34	0	95	0
2. No soil movement on site	30	3	96	1
Firebreak erosion controlled	18	0	111	0
SMZ integrity honored	28	1	100	0
Windrows on contour/free of soil	9	1	119	0
No chemicals off site	29	0	100	0
7. Mechanical site prep/planting on contour	20	1	108	0
8. Stream free of sediment	29	0	100	0
VIII. Landings 110 applicable				
VIII. Landings	Yes	No	NA	Sig. Risk
Locations free of oil/trash	85	25	19	0
Located outside of SMZ	102	3	24	0
Well-drained location	102	6	19	0
Well-drained location Number and size minimized	104	4	19	0
			19	
Respect sensitive areas Restored/stabilized	108 105	2 5	19	0 0
0. Restored/stabilized				
	103	J	19	Ü
IX. Wetlands 36 applicable	103	Ü	19	Ü
IX. Wetlands 36 applicable	<u>Yes</u>	<u>No</u>	<u>NA</u>	Sig. Risk
IX. Wetlands 36 applicable1. Avoid altering hydrology of site		-		-
	<u>Yes</u>	<u>No</u>	<u>NA</u>	Sig. Risk
Avoid altering hydrology of site	<u>Yes</u> 31	<u>No</u> 5	<u>NA</u> 93	Sig. Risk 2
 Avoid altering hydrology of site Road drainage structures installed properly Mandatory road BMPs followed 	<u>Yes</u> 31 19	<u>No</u> 5 2	<u>NA</u> 93 108	Sig. Risk 2 1
Avoid altering hydrology of site Road drainage structures installed properly	<u>Yes</u> 31 19 18	No 5 2 3	<u>NA</u> 93 108 108	Sig. Risk 2 1 2
 Avoid altering hydrology of site Road drainage structures installed properly Mandatory road BMPs followed X. Overall Compliance	<u>Yes</u> 31 19 18	No 5 2 3	<u>NA</u> 93 108 108	Sig. Risk 2 1 2
 Avoid altering hydrology of site Road drainage structures installed properly Mandatory road BMPs followed X. Overall Compliance III. Permanent Roads - 93.6%	<u>Yes</u> 31 19 18 <u>Yes</u> 646	No 5 2 3 No 38	NA 93 108 108	Sig. Risk 2 1 2 Sig. Risk 4
 Avoid altering hydrology of site Road drainage structures installed properly Mandatory road BMPs followed Overall Compliance Permanent Roads - 93.6% Temporary Roads/Skid Trails- 92.9% 	Yes 31 19 18 Yes 646 498	No 5 2 3 No 38 38	NA 93 108 108 108 NA 90 109	Sig. Risk 2 1 2 Sig. Risk 4 3
 Avoid altering hydrology of site Road drainage structures installed properly Mandatory road BMPs followed Overall Compliance Permanent Roads - 93.6% Temporary Roads/Skid Trails- 92.9% Stream Crossings - 79.3% 	Yes 31 19 18 Yes 646 498 322	No 5 2 3 No 38 38 38	NA 93 108 108 NA 90 109 755	Sig. Risk 2 1 2 Sig. Risk 4 3 17
 Avoid altering hydrology of site Road drainage structures installed properly Mandatory road BMPs followed Overall Compliance Permanent Roads - 93.6% Temporary Roads/Skid Trails- 92.9% Stream Crossings - 79.3% Streamside Management Zones - 90.9% 	Yes 31 19 18 Yes 646 498 322 751	No 5 2 3 No 38 38 84 75	NA 93 108 108 NA 90 109 755 206	Sig. Risk 2 1 2 Sig. Risk 4 3 17 7
 Avoid altering hydrology of site Road drainage structures installed properly Mandatory road BMPs followed Overall Compliance Permanent Roads - 93.6% Temporary Roads/Skid Trails- 92.9% Stream Crossings - 79.3% Streamside Management Zones - 90.9% Site Preparation - 97.0% 	Yes 31 19 18 Yes 646 498 322 751 197	No 5 2 3 No 38 38 84 75 6	NA 93 108 108 NA 90 109 755 206 829	Sig. Risk 2 1 2 Sig. Risk 4 3 17 7 1
 Avoid altering hydrology of site Road drainage structures installed properly Mandatory road BMPs followed Overall Compliance Permanent Roads - 93.6% Temporary Roads/Skid Trails- 92.9% Stream Crossings - 79.3% Streamside Management Zones - 90.9% Site Preparation - 97.0% Landings - 93.1% 	Yes 31 19 18 Yes 646 498 322 751 197 610	No 5 2 3 No 38 38 84 75 6 45	NA 93 108 108 108 NA 90 109 755 206 829 119	Sig. Risk 2 1 2 Sig. Risk 4 3 17 7 1
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