

**GREEN MOUNTAIN DIVISION
NEW ENGLAND SOCIETY OF AMERICAN FORESTERS
POSITION STATEMENT ON
ACCEPTABLE MANAGEMENT PRACTICES**

ISSUE: Protecting water quality during logging in Vermont is done through the use of the Acceptable Management Practices (AMP's). The AMP's are not a mandated regulation. They function as a set of practices that when properly implemented, exempt logging operations from the need for individual discharge permits. The Green Mountain Division of the Society of American Foresters recognizes that the debate over the effectiveness and level of compliance with the AMP's has increased in Vermont.

BACKGROUND: The impacts of timber harvesting on waters of the United States have been regulated in some manner for over 100 years. The Federal Water Control Act of 1972 addressed forest practices through Section 208. Under Section 208(b)2(F), States were directed to develop area-wide plans to address and minimize non point source pollution. Nationwide, State level water quality and forestry agencies have developed systems of Best Management Practices to minimize erosion and sedimentation. Vermont amended its Water Quality Standards in 1980. In order to comply with the revised law and the Federal Clean Water Act, the Acceptable Management Practices for Maintaining Water Quality On Logging Jobs In Vermont were developed and published.

The system that Vermont has followed to implement the use of AMP's is designed to encourage the education of timber harvesters. Complaints on water quality problems alleged to occur from logging are referred to an AMP team consisting of a State forester, a State Environmental Enforcement Officer, and a member of the Vermont Forest Products Association. The type-of problem that is encountered will determine the type of team response. Efforts are made to have the logger correct the problem with the advice of the team. The use of followup visits by the team insures compliance or the use of enforcement action. Vermont's Water Quality Standards (VWQS) indicate that when the AMP's are "in place" a discharge can occur and there is no violation. If a discharge is evident and the AMP's are not properly in place there is a violation. Recent, changes to the VWQS seem to reduce this "presumption of compliance" that is outlined in the AMP booklet.

POSITION: The Green Mountain Division of the Society of American Foresters supports the current educational AMP team system for the protection of water quality in Vermont forests. Forests provide the highest level of water quality of any land use. The current AMP system is both cost efficient and effective. It is not necessary, at this time to require specific AMP's be mandated through regulation at the State level. The State legislature should provide more uniform and dependable funding to document serious noncompliance, follow up with educational programs and report offenders to appropriate authorities to penalize.

EXPIRATION: Adopted by the Executive Committee on 01-07-97 and shall expire on 01-07-04 unless, after review it is decided otherwise by the committee. The Committee extended the expiration date until 01-30-09.