

Tolko Industries Ltd, High Level Lumber Division



SFM Plan revision to meet CSA Z809:2008 Standard

DRAFT Indicators and Targets related to Criterion 1

“Biological Diversity”

**NOTE:

The following information is DRAFT text only and will be expanded upon following Public process and further evaluation by Tolko forest managers.

Definitions of items in subsequent Tables:

	DESCRIPTION
Indicator	A variable that measures or describes the state or condition of a value. Can be a Core Indicator in the CSA Standard or part of public process.
CCFM Criterion	Canadian Council of Forest Ministers developed Criterion for Sustainable Forest Management.
CSA SFM Element	The subcategory used to define the scope of each SFM criterion. Note: <i>Each SFM criterion contains several elements. The SFM elements were derived from the national-scale elements developed by the CCFM for more specific local applications.</i>
Strategy(s), Description	A coordinated set of actions designed to meet established targets.
Means of Achieving Objective & Target	Description of how the proponent will likely accomplish the objective & target. Processes and responsibilities may be described.
Forecast: Predicted Results or Outcome	Background for development of forecast statement. May include information on trends, past performance, etc.
Forecast	Statement of how each indicator will be met or exceeded based on the applicable strategy.
Value	A Defined Forest Area characteristic, component, or quality considered by an interested party to be important in relation to an SFM element or other locally identified element.
Objective	A broad statement describing a desired future state or condition of a value.
Target	A specific statement describing a desired future state or condition of an indicator. Note: <i>Targets should be clearly defined, time-limited, and quantified, if possible.</i>
Basis of Target	Description of why target was chosen.
Legal Requirements	Identify any legal requirement behind Target.
Monitoring & Measurement	Statement of how the proponent will determine performance to Target.
Reporting	Statement of how & when the proponent will report on performance to Target.
Acceptable Variance	Allowed variance of performance to target (eg, “+/- 5%”, “None”, etc.)

Indicator	1.1.1 Ecosystem area by type
CCFM Criterion	1. Biological Diversity
CSA SFM Element	1.1 Ecosystem Diversity: Conserve ecosystem diversity at the stand and landscape levels by maintaining the variety of communities and ecosystems that occur naturally in the DFA
Strategy(s), Description	<ul style="list-style-type: none"> • Use of Natural Subregion Mapping in DFMPs, Landscape level planning by AB, and creation of seed zones • By managing the landscape based on the subregion classification system (combined with ecosite classification), meeting licensee obligations of reforestation, the forest manager is able to meet management targets
Means of Achieving Objective & Target	<ul style="list-style-type: none"> • Maintenance of the Natural Subregion mapping as reported by AB • Ensure ecosites are known to guide management decisions
Forecast: Predicted Results or Outcome	Natural subregion mapping is available to licensees by AB to manage land base
Forecast	Maintenance of healthy ecosystems through ongoing management
Value	Landscape scale biodiversity
Objective	Healthy and functioning ecosystems with natural attributes.
Target	Maintenance of Natural Sub Region Mapping
Basis of Target	Utilization of Natural Subregion mapping during planning
Legal Requirements	Required in various land management activities
Monitoring & Measurement	Reporting of area within Natural Subregions will occur as a component to the Landscape Assessment in DFMP submission.
Reporting	At time of DFMP submission
Acceptable Variance	None

Indicator	1.1.2 Forest area by type or <u>species composition</u>
CCFM Criterion	1. Biological Diversity
CSA SFM Element	1.1 Ecosystem Diversity: Conserve ecosystem diversity at the stand and landscape levels by maintaining the variety of communities and ecosystems that occur naturally in the DFA
Strategy(s), Description	<ul style="list-style-type: none"> • Maintenance of mixedwoods is a requirement by Alberta, hence the need to maintain a balance of strata • Ecosystem resilience and health • Habitat needs • Maintenance of Allowable Annual Cut (AAC) and land base
Means of Achieving Objective & Target	<ol style="list-style-type: none"> a) Correct initial strata declarations b) Management of regenerating stand until performance survey (12+ years) c) Ensure regenerating stand is included in performance survey program
Forecast: Predicted Results or Outcome	<i>(still need to add background information)</i>
Forecast	Area of strata harvested balances with area of strata declared
Value	Stand and Landscape scale biodiversity
Objective	Manage the DFA to ensure a balance of species composition
Target	Reforest harvest areas to the stratum as per the FMP regenerated yield assumptions (strata specific area harvested must balance with the strata specific area declared).
Basis of Target	Provincial requirement to balance.
Legal Requirements	Reforestation Standards of Alberta
Monitoring & Measurement	Strata declarations and performance survey procedures per RSA
Reporting	<p>Annual: report completion of surveys</p> <p>5 years: Summary of balancing report</p>
Acceptable Variance	Within variance allowed by RSA

Indicator	1.1.3 Forest area by Seral stage or age class
CCFM Criterion	1. Biological Diversity
CSA SFM Element	1.1 Ecosystem Diversity: Conserve ecosystem diversity at the stand and landscape levels by maintaining the variety of communities and ecosystems that occur naturally in the DFA
Strategy(s), Description	<p>Tolko will utilize a method to place a non-timber value on forest stands in order to conserve stands over time to meet seral stage targets:</p> <ul style="list-style-type: none"> • Value assigned to stand based on proximity to features • Stands identified for seral stage maintenance will spatially change over time as stands mature and become scheduled for harvest • Maintenance to a specific level will occur over the 200 year planning horizon (immediate balancing may not occur depending on current age class structure)
Means of Achieving Objective & Target	<ul style="list-style-type: none"> • Timber Supply Model and SHS will project to ensure objective and target are met over 200 year planning horizon • Information provided by the Natural Range of Variability report will be used as a guide (Andison, 2007)
Forecast: Predicted Results or Outcome	Seral stage levels are maintained and provide quality stands to meet other objectives over the planning horizon.
Forecast	<i>(Predicted results)</i>
Value	Stand and Landscape scale biodiversity
Objective	Maintain biodiversity by retaining the full range of cover types and seral stages
Target	<p>Over the 200-year planning horizon;</p> <p>a) <i>Gross landbase</i>: greater than X%¹ old forest, greater than Y% mature plus old forest, less than Z% young forest; and</p> <p>b) <i>Net landbase</i>: greater than X% old forest, greater than Y% mature plus old forest, less than Z% young forest.</p> <p>Note: Old forest retention shall include the full natural range of ages</p>
Basis of Target	<ul style="list-style-type: none"> • Targets and seral stage definitions shall be based on sound science, ecological considerations, wildlife zones, and disturbance regimes. Target shall ensure representation of natural range of ecosystem attributes (e.g., productivity class).
Legal Requirements	Alberta Planning Manual

Monitoring & Measurement	<ul style="list-style-type: none"> • Variance to plan commitments • Avoidance of seral stage required stands by spatial harvest sequence (SHS) • Regular updates to inventory
Reporting	FMP: Tables of indicators (values and targets) at 0, 10, 50, 100, and 200 years. Maps of indicators at 0, 10 yrs, 50 years. Performance: Stewardship Report
Acceptable Variance	Area (ha) of old and mature forests in each DFA subunit by cover class shall be between 90% and 100% of target areas. Area of young forest in each DFA subunit by cover class shall not exceed 110% of target area

Indicator	1.1.4 Degree of within-stand structural retention
CCFM Criterion	1. Biological Diversity
CSA SFM Element	1.1 Ecosystem Diversity: Conserve ecosystem diversity at the stand and landscape levels by maintaining the variety of communities and ecosystems that occur naturally in the DFA
Strategy(s), Description	<p>From 2005 plan:</p> <p><i>Maintaining various types, amounts, and distribution of residual structure is important in maintaining ecosystem function and biological diversity at the stand and landscape level.</i></p> <p><i>As outlined in the Companies DFMP (4.1.3 – Strategy 2) the Companies have incorporated volume and area targets to address the issue of structure retention within harvest areas.</i></p> <p><i>To increase the value of residual structure to wildlife, stem retention will be emphasized in areas where multiple canopy layers and a range of tree sizes and species exist on the landscape. Combining retention of residual material and merchantable stems during operations, as well as ensuring that structure is retained near the cutblock edge, will enhance the value to wildlife by creating a gradual ecotone between the cutblock and the adjacent forest.</i></p> <p><i>Provide field personnel and harvesting contractors with on the ground measureable block specific targets to achieve the landscape level targets identified above.</i></p>
Means of Achieving Objective & Target	<p>Train staff & contractors in patch retention</p> <p>Retention trees, preferably in patches, to be identified prior to and during harvest</p> <p>The companies will work towards development of a more scientific and ecologically based target</p>
Forecast: Predicted Results or Outcome	<p>From 2005 plan:</p> <p><i>Stand-level retention strategies will be determined prior to the commencement of harvest operations through structure retention plans. Specific retention strategies will be discussed with the operator(s) during Tailgate Meetings.</i></p> <p><i>In measuring structure retention, the Companies will develop cost effective and practical assessment strategies to quantify and evaluate merchantable volume retention.</i></p>
Forecast	<ul style="list-style-type: none"> Retention levels will vary depending on block size. Small blocks may have 0% retention due to safety or operational concerns and larger blocks may have greater than the targeted retention levels due to more flexibility in placement of retention that would not interfere with operations but still meet objective. Retention is evaluated on the landscape level and not at the stand (block) level.
Value	Stand and Landscape scale biodiversity
Objective	<ul style="list-style-type: none"> Make allowances for retaining varying wildlife habitats during harvesting operations. Incorporate the needs of wildlife into operational planning to minimize the effects of operations on wildlife populations.

Target	<ul style="list-style-type: none"> • A minimum of 3% of the merchantable coniferous and deciduous volume will be retained during harvest operations and; • A minimum of 5% of harvested area to be retained as residual material.
Basis of Target	Merchantable and unmerchantable residual material provide valuable habitat for a number of species at the cutblock level.
Legal Requirements	UHROGR, Planning Standard
Monitoring & Measurement	<p>From 2005 plans:</p> <p><i>To align the amount of volume retained with the amount of volume harvested annually, retention (%) will be summarized annually and reported every at the end of each cut-control period and/ or in the Stewardship Report.</i></p> <p><i>The retention of residual material will be summarized annually through GPS information and/ or cutblock photography and will also be reported in the Stewardship Report.</i></p> <p><i>The targets for this indicator will be measured over the planning period and through adaptive management, retention strategies will be continually evaluated and incorporated into successive forest management plans.</i></p>
Reporting	above
Acceptable Variance	Although retention targets will be averaged over the DFA, there will be variance at the cutblock and compartment level(s).

Indicator	1.2.1 Degree of habitat protection for selected focal species including species at risk
CCFM Criterion	1. Biological Diversity
CSA SFM Element	1.2 Species Diversity: Conserve species diversity by ensuring that habitats for the native species found in the DFA are maintained through time, including habitats for known occurrences of species at risk.
Strategy(s), Description	Habitat assessments and adherence to government identified habitat zones (wildlife referral mapping) and use of Alberta Natural Heritage Information Centre data (plus ACIMS) during plan development.
Means of Achieving Objective & Target	By utilizing all of the following: Harvesting plans, road construction, OGR, planning and implementation, adherence to provincial wildlife guidelines, EMS Training Module.
Forecast: Predicted Results or Outcome	Licensees have attempted to follow the requirements for working within UWR's and CPA's and have requested variances from time to time from Fish & Wildlife when operations would be restricted.
Forecast	Improved ability to adhere to timing restrictions as well as using best available information during Operational Planning in order to comply.
Value	Manage the DFA to maintain wildlife habitat and species diversity
Objective	To incorporate the needs of wildlife into operational planning to minimize the effects of operations on wildlife populations
Target	<ul style="list-style-type: none"> • 100% Compliance with operational plans in Critical Wildlife Areas • Species at Risk training completed by anyone working for Tolko on the DFA • Adhering to land use decisions with respect to species habitat maintenance
Basis of Target	Based on sound science, ecological considerations, wildlife zones, Committee on the Status of Endangered Wildlife in Canada (COSEWIC) list, provincially listed species, BSOD, ANHIC, Recovery plans, Fish and Wildlife Division priorities, public consultation, habitat suitability analysis, literature review, observation data, local and traditional knowledge
Legal Requirements	Recovery plans for species at risk, Federal Species at Risk Act
Monitoring & Measurement	Habitat assessment mapping, population monitoring
Reporting	Annually report if operations complied with restrictions in Critical Wildlife Zones. Where there was a variance explain if approval was given for variance and reason for variance.
Acceptable Variance	Variances to restrictions in Critical Wildlife Zones are acceptable only if approved by Alberta.

Indicator	1.2.2 Degree of suitable habitat in the long term for selected focal species including species at risk (SAR).
CCFM Criterion	1. Biological Diversity
CSA SFM Element	1.2 Species Diversity: Conserve species diversity by ensuring that habitats for the native species found in the DFA are maintained through time, including habitats for known occurrences of species at risk.
Strategy(s), Description	From 2005 Plan: <i>As outlined in 4.1.2 (Strategy 1) of the DFMP (2003), the Companies assessed habitat availability across the FMA, and where applicable, within identified wildlife zones. Species selection was based primarily on provincial status, association with specific stands and/or condition, and social importance. The species selected for the analysis included the American marten (Martes americana), Moose (Alces alces), Pileated Woodpecker (Dryocopus pileatus), Wood Bison (Bison bison), and Woodland Caribou (Rangifer tarandus).</i>
Means of Achieving Objective & Target	Following Spatial Harvest Sequence
Forecast: Predicted Results or Outcome	From 2005 Plan: <i>The DFMP included a 100-year forecast of habitat availability based on the PFMS for selected species based on the criteria outlined in Table 8-37 (Wildlife Habitat Criteria) of the DFMP.</i> <i>The information projected in Figure 11 illustrates current habitat summaries, as well as periodic “snapshots” in 10, 50, and 100 years into the future.</i> <i>The analysis that was completed in the DFMP will serve as a benchmark for forecasting future management strategies and management alternatives in the selection of future Preferred Forest Management Strategies (PFMS’s).</i>
Forecast	Adherence to Spatial Harvest Sequence will result in habitat maintained.
Value	Manage the DFA to maintain wildlife habitat and species diversity
Objective	To incorporate the needs to wildlife into operational planning to minimize the effects of operations on wildlife populations.
Target	Maintain or increase habitat for focal species over the first 10 years of the FMP.
Basis of Target	Based on sound science, ecological considerations, wildlife zones, Committee on the Status of Endangered Wildlife in Canada (COSEWIC) list, provincially listed species, BSOD, ANHIC, Recovery plans, Fish and Wildlife Division priorities, public consultation, habitat suitability analysis, literature review, observation data, local and traditional knowledge
Legal Requirements	Recovery plans for species at risk, Federal Species at Risk Act
Monitoring & Measurement	<ul style="list-style-type: none"> • Variance to approved sequence. Maintaining within the variance tolerances during the period will allow the target to be achieved • AVI updates

	<ul style="list-style-type: none">• Wildlife habitat requirements from Biologist
Reporting	FMP: For species with a suitable habitat target provide tables of area (ha) of suitable habitat at 0, 10, 50, 100, and 200 years. Maps of suitable habitat at 0, 10, and 50 years.
Acceptable Variance	At the end of the 10-year FMP term the target is achieved or exceeded.

Indicator	1.2.3 Proportion of regeneration comprised of native species.
CCFM Criterion	1. Biological Diversity
CSA SFM Element	1.2 Species Diversity: Conserve species diversity by ensuring that habitats for the native species found in the DFA are maintained through time, including habitats for known occurrences of species at risk.
Strategy(s), Description	<p>From 2005 Plan:</p> <p><i>This indicator was established in accordance with ASRD's "Standards for Tree Improvement in Alberta", May 2003 Edition manual and is thus a compliance indicator.</i></p> <p><i>The manual contains standards to safeguard genetic diversity during the reforestation of harvested areas. The standards are focused on activities of tree seed and vegetative material collection, registration, processing and reforestation of tree seedlings and vegetative material on public lands in Alberta.</i></p> <p><i>The manual provides a detailed description of the individual seed zones and outlined the rules and limits for deployment of seedling from native sources.</i></p>
Means of Achieving Objective & Target	Silviculture record keeping.
Forecast: Predicted Results or Outcome	Seed collection strategies will parallel the Companies reforestation program(s) to ensure that genetic diversity is maintained across the DFA.
Forecast	The Companies will ensure annual compliance with the "Alberta Forest Genetic Resource Management and Conservation Standards" (formerly Standards for Tree Improvement in Alberta).
Value	Maintain tree species & genetic diversity.
Objective	To ensure cutblocks are reforested with genetically diverse crop trees.
Target	Seed deployment will comply with ASRD guidelines for Deployment of Registered Material.
Basis of Target	Alberta Forest Genetic Resource Management and Conservation Standards (AFGRMCS)
Legal Requirements	ASRD standards specify seed zones and guidelines for seed movement (AFGRMCS)
Monitoring & Measurement	Identify seedlots used in operational reforestation and seed zones or locations where seed was deployed.
Reporting	Annually
Acceptable Variance	No variance is acceptable unless approved by ASRD.

Indicator	1.2.4 Range of patch sizes by subunit and entire DFA
CCFM Criterion	1. Biological Diversity
CSA SFM Element	1.2 Species Diversity: Conserve species diversity by ensuring that habitats for the native species found in the DFA are maintained through time, including habitats for known occurrences of species at risk.
Strategy(s), Description	
Means of Achieving Objective & Target	<ul style="list-style-type: none"> • Spatial and temporal harvest planning. • Patch size distribution targets are set for forest patches less than 20 years old • NRV report by Anderson
Forecast: Predicted Results or Outcome	<ul style="list-style-type: none"> • Natural patterns will attempt to be emulated however large scale disturbances will be avoided due to social pressures and very small scale disturbances are already taken care of by nature. • Achieving a balance
Forecast	Spatial harvest sequence that maximizes block sizes based on Anderson report and is operationally efficient and acceptable.
Value	Landscape scale biodiversity
Objective	Maintain biodiversity by avoiding landscape fragmentation
Target	a) A distribution of harvest area sizes that will result in a patch size pattern over the 200 year planning horizon approximating patterns created by natural disturbances
Basis of Target	Targets shall be based on sound science, ecological considerations, wildlife zones, and disturbance regimes. Target shall ensure representation of natural range of ecosystem attributes (e.g. cover class and productivity class)
Legal Requirements	Alberta Forest Management Planning Standard
Monitoring & Measurement	Regular updates to forest inventory
Reporting	FMP: Tables of area of forest in each patch size class by subunit at 0, 10, and 50 yrs (or end of first rotation). Maps of patch size classes at 0, 10, and 50 yrs, (or end of first rotation). Performance: Stewardship Report
Acceptable Variance	a) At the end of the 10-year FMP term the target distribution is achieved; or demonstrated progress to achieving target in one rotation where the pattern has deviated significantly from the target

Indicator	1.3.1 The amount of area (ha) planted with seedlings from orchard stock.
CCFM Criterion	1. Biological Diversity
CSA SFM Element	1.3 Genetic Diversity: Conserve genetic diversity by maintaining the variation of genes within diversity.
Strategy(s), Description	From 2005 SFM Plan: <i>Tolko Industries Ltd. is currently partners with a number of companies/ agencies in a Tree-Improvement Program for areas within and adjacent to the DFA. This program involves only a small portion of the DFA and incorporates geographical distribution and elevation.</i>
Means of Achieving Objective & Target	Actively collect seed from identified seed zones
Forecast: Predicted Results or Outcome	From 2005 SFM Plan: <i>The implementation of a Tree-Improvement Program for the DFA will be in compliance with the identified regions (Region-J and Region-H) and the standards and variances identified by the Companies.</i>
Forecast	Tolko will continue to meet the target as any deployed seed material will be from wild sources for the foreseeable future. The cost / benefit model of tree improvement programs in Alberta are under evaluation by Industry & Alberta to determine the way forward.
Value	Maintain genetic diversity
Objective	To ensure that cutblocks are reforested with genetically diverse seedlings
Target	<25% of area harvested in the DFA will be planted with seedlings from orchard seed.
Basis of Target	<25% of area harvested in the DFA will be planted with seedlings from orchard seed.
Legal Requirements	ASRD Guidelines is 30%
Monitoring & Measurement	Annually report the amount of seedlings planted from orchards vs. native seed zones
Acceptable Variance	Acceptable variance is +/- 5%

Indicator	1.3.2 Native seed used in operational reforestation will be best suited to the area being reforested.
CCFM Criterion	1. Biological Diversity
CSA SFM Element	1.3 Genetic Diversity: Conserve genetic diversity by maintaining the variation of genes within diversity.
Strategy(s), Description	<p>From 2005 Plan:</p> <p><i>This indicator was established in accordance with ASRD's "Standards for Tree Improvement in Alberta", May 2003 Edition manual and is thus a compliance indicator.</i></p> <p><i>The manual contains standards to safeguard genetic diversity during the reforestation of harvested areas. The standards are focused on activities of tree seed and vegetative material collection, registration, processing and reforestation of tree seedlings and vegetative material on public lands in Alberta.</i></p> <p><i>The manual provides a detailed description of the individual seed zones and outlined the rules and limits for deployment of seedling from native sources.</i></p>
Means of Achieving Objective & Target	Silviculture record keeping.
Forecast: Predicted Results or Outcome	Seed collection strategies will parallel the Companies reforestation program(s) to ensure that genetic diversity is maintained across the DFA.
Forecast	The Companies will ensure annual compliance with the "Alberta Forest Genetic Resource Management and Conservation Standards" (formerly Standards for Tree Improvement in Alberta).
Value	Maintain genetic diversity
Objective	To ensure that cutblocks are reforested with genetically diverse seedlings
Target	Seed deployment will comply with ASRD guidelines for Deployment of Registered Material.
Basis of Target	Alberta Forest Genetic Resource Management and Conservation Standards
Legal Requirements	Alberta Forest Genetic Resource Management and Conservation Standards
Monitoring & Measurement	Identify seedlots used in operational reforestation and seed zones or locations where seed was deployed.
Reporting	Annually
Acceptable Variance	No variance is acceptable unless approved by Alberta.

Indicator	1.4.1 Proportion of identified sites with implemented management strategies
CCFM Criterion	1. Biological Diversity
CSA SFM Element	1.4 Protected Areas and Sites of Special Biological and Cultural Significance: Respect protected areas identified through government processes. Cooperate in broader landscape management related to protected areas and sites of special biological significance and cultural significance. Identify sites of special biological and cultural significance within the DFA and implement management strategies appropriate to their long term maintenance.
Strategy(s), Description	<i>TBD</i>
Means of Achieving Objective & Target	<i>TBD</i>
Forecast: Predicted Results or Outcome	<i>TBD</i>
Forecast	<i>TBD</i>
Value	<i>TBD</i>
Objective	<i>TBD</i>
Target	<i>TBD</i>
Basis of Target	<i>TBD</i>
Legal Requirements	<i>TBD</i>
Monitoring & Measurement	<i>TBD</i>
Acceptable Variance	<i>TBD</i>

Indicator	1.4.2 Protection of identified sacred and culturally important sites.
CCFM Criterion	1. Biological Diversity
CSA SFM Element	1.4 Protected Areas and Sites of Special Biological and Cultural Significance: Respect protected areas identified through government processes. Cooperate in broader landscape management related to protected areas and sites of special biological significance and cultural significance. Identify sites of special biological and cultural significance within the DFA and implement management strategies appropriate to their long term maintenance.
Strategy(s), Description	<p>From 2005 SFM Plan</p> <p><i>This indicator has been established to ensure that areas of historical and/or cultural significance are protected during harvesting and silvicultural operations.</i></p> <p><i>Through a consultant, the Companies have incorporated previously identified heritage sites into operation plan development and can predict the potential location of heritage or cultural sites based on topographical features, watercourses, existing access and covertypes.</i></p> <p><i>Through the Companies PIP, the Companies will also involve the public in identifying the location of historical and/or cultural sites within the DFA.</i></p>
Means of Achieving Objective & Target	Assistance from Archaeologist
Forecast: Predicted Results or Outcome	<p>From 2005 SFM Plan</p> <p><i>During the development of Final Harvest Plans (FHP's), forest planners will identify cutblocks and/or access routes that may threaten the integrity of known or potential historical and/or cultural locations through harvesting or silvicultural operations.</i></p> <p><i>An evaluation of scheduled activities will be completed to assess the potential impact of the activity(s) and plans will be adjusted if necessary.</i></p> <p><i>The appropriate permits will be obtained prior to the commencement of harvesting or silvicultural operations.</i></p>
Forecast	Tolko will complete an Archaeological Assessment for blocks that are within high probability areas for traditional use. Tolko will comply with the results of this assessment.
Value	Recognize and incorporate Aboriginal cultural and historical sites into operational planning.
Objective	To conduct operations while minimizing impacts on areas of historical, recreational, unique ecological, aesthetic, or other land use areas of significance.
Target	100% Compliance with the Historical Resources Act
Basis of Target	Legal requirement
Legal Requirements	Historical Resources Act

Monitoring & Measurement	Results of annual assessment
Reporting	Annually. Report on results from annual assessment.
Acceptable Variance	No variance is acceptable.