
APPENDIX A: VARIANCE JUSTIFICATION FORM

Variance Justification Form Instructions

The first page of the form can be repeated for each facility, and text boxes can be expanded to include additional information. If a section is “Not applicable”, it is recommended to provide an explanation of why it is “Not Applicable”. The following describes the sections of the form and the information to include:

- Facility(ies)
 - Include separate pages for each facility. In some instances, two or more facilities that are in close proximity and have the same deficiency could be grouped to avoid redundancy; however, information should not be generalized.
- Deficiency Type(s)
 - All the deficiencies that occur on the site must be listed in this section, as the combined impacts of all deficiencies must be weighed together to determine if any one deficiency can receive a variance. Submission of a variance request for a site that has already received a variance for one deficiency is discouraged.
- Description of the Deficiency
 - The description of the deficiency should be as detailed as possible and include the dimensions and the location on the site (i.e., site diagram and coordinates).
 - For problematic species (e.g., weeds), the description should include the species, locations of patches or populations on-site, and number of plants or percent cover within the grid or site. Data from multiple years is encouraged to show trends over time.
 - Describe when the deficiency was identified (or why the deficiency may not have been identified) and why it wasn’t and corrected previously. Include information on any attempts to correct the deficiency in the section labelled “Actions Taken to Address Deficiency”.
- Pre-existing Conditions and Pre-disturbance Biophysical Information
 - Review information from pre-disturbance assessments, environmental field reports or other documents, if available. Historical aerial imagery could provide coarse scale information if other sources of information are lacking.
 - Summarize and interpret this data to determine if the pre-disturbance conditions may have contributed to the deficiency and/or demonstrate how the pre-disturbance conditions were equivalent to the reclaimed conditions.
- Surrounding Area – Land Use(s) and Biophysical Information
 - Review information on the current and historical land uses and biophysical conditions from field assessment data, historical aerial imagery, provincial databases, or other sources.

- Summarize and interpret this data to determine if the surrounding land use may have contributed to the deficiency and/or demonstrate there are conditions comparable to the deficiency in the surrounding area (natural analogs).
- Provide the locations and sizes of any natural analogs and include photographs.
- Provide the names and distances to nearby populated areas (if relevant).
- Construction/Reclamation Limitations
 - Summarize information on the site's history of construction and initial reclamation and determine if there were any factors during construction and initial reclamation that may have caused the deficiency.
- Actions Taken to Address Deficiency
 - Summarize any work completed in attempt to address the deficiency in part or in full (e.g., hand pulling or herbicide application).
 - Describe the outcome of this work.
- Alternatives to Justification Considered
 - List the possible techniques that could be used to remedy the deficiency.
 - Describe why leaving the deficiency "as-is" will result in the best ecological outcome (net-environmental benefit).
- Annual Monitoring Results and Current Site Conditions
 - Summarize the results of annual monitoring (e.g., detailed site assessment(s)) and describe the historical trajectory of the site and current state of the site.
- Limitations or Hazards Caused by Deficiency
 - List and describe the probability (i.e., likelihood of occurrence) and severity (i.e., consequences of occurrence) of any risks that not remedying the deficiency could cause to future land users and wildlife (including risk of wildfire).
 - Describe any steps taken to limit the risk.
- Rationale for Variance
 - Summarize information from the previous sections of the justification form to explain why:
 - the site still meets equivalent land capability and is on a trajectory towards a forested ecosystem even with the deficiency left in place, and
 - leaving the deficiency "as-is" results in the best possible ecological outcome (i.e., environmental cost-benefits analysis).
 - Include data from the DSA to support explanations.
 - Include additional supporting information (refer to Section 4.2 and 5.0).

- When justifying multiple deficiencies, do not provide contradictory evidence; a statement that supports one deficiency should not be disproven in the arguments for another deficiency.
- Support the rationale with relevant literature (Section 6.1).

The following information should also be attached to support the justification:

- Photographs of each deficiency and for each facility
- Site diagram (including overlapping dispositions).
- Survey plans.
- DSA, including CAT and RoO datasheets and any supporting reports.
- Aerial photos.
- Construction records.
- Pre-disturbance biophysical information.
- Any other relevant information.

Background information that should be included if the variance justification form is not accompanied by a CAT and RoO includes:

- Site overview, ecological and land use information, and any overlapping dispositions.
- Facility location and size.
- Site history (dates and descriptions of activities and conditions).

Professional Justification

Facility(ies):	
Deficiency Type:	
Description of Deficiency (including location and extent/dimensions of the deficiency)	
Pre-existing Conditions and Pre-disturbance Biophysical Information (summarize causal factors/natural analogs)	
Surrounding Area - Land Use(s) and Biophysical Description (summarize causal factors/natural analogs)	
Construction/Reclamation Limitations (summarize causal factors – e.g., soil salvage/replacement limitations)	
Actions Taken to Address Deficiency (e.g., hand pulling or herbicide application)	
Alternatives to Justification Considered	
Annual Monitoring Results (e.g., current state of the site, vegetation trajectory, trends in weed population size)	
Limitations or Hazards Caused by Deficiency	
Rationale for Variance (summary of all available information and demonstrate equivalent land capability)	

Site Photographs

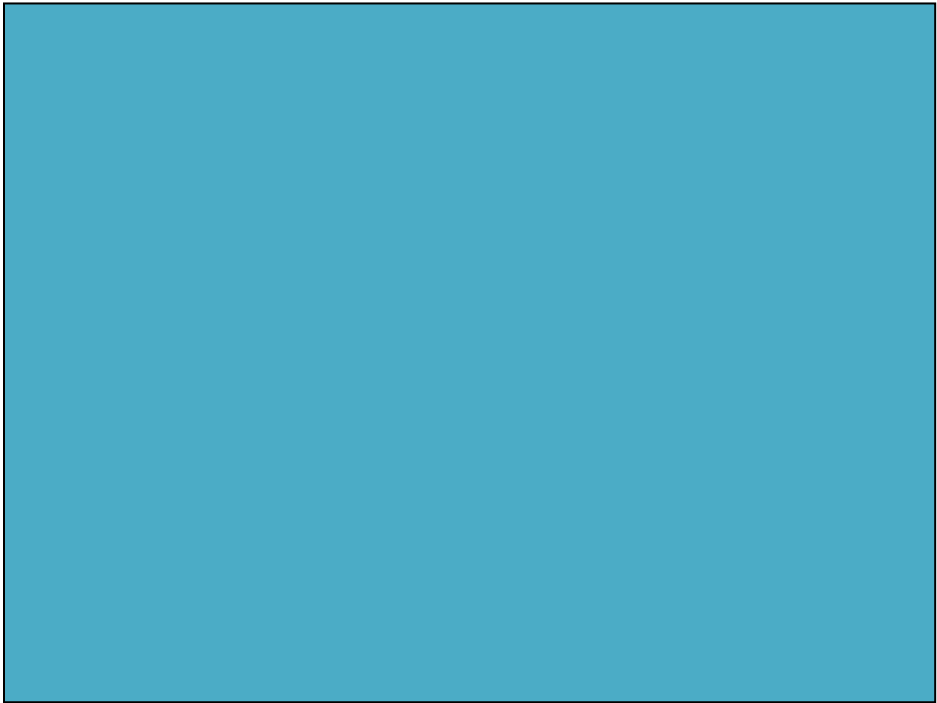


Photo 1. Photo caption

Photo Date: Month Day, Year

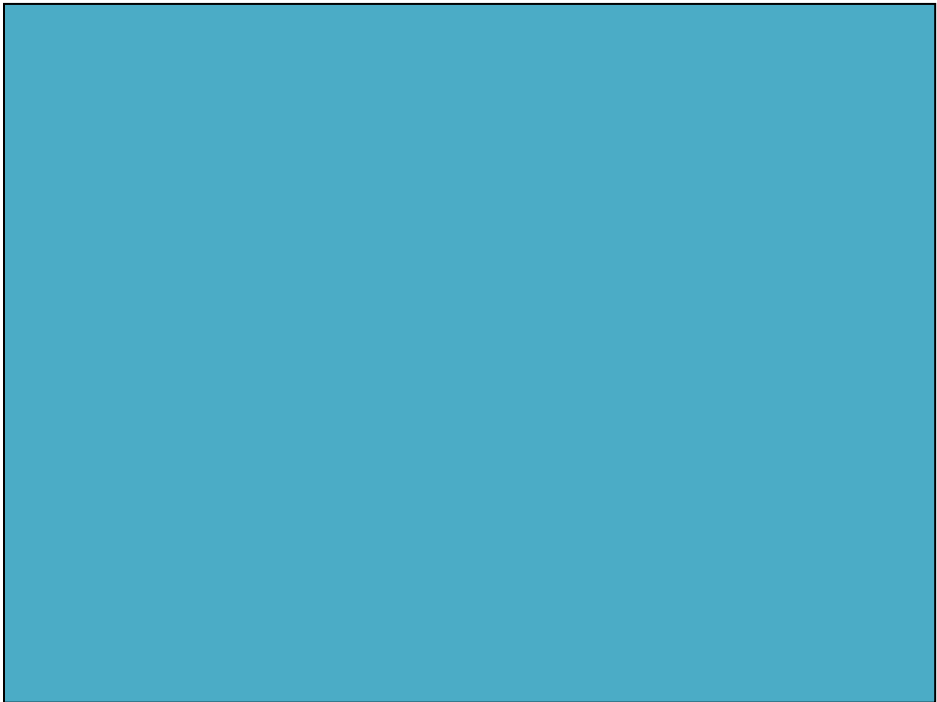


Photo 2. Photo caption

Photo Date: Month Day, Year

Sign-off

Person Preparing Justification		
	Name (Print)	Title
	Signature	Date (mm/dd/yyyy)
Name of Regulatory Official Approving Variance		
	Name	Date (mm/dd/yyyy)

Attached Supporting Information

<input type="checkbox"/>	Site diagram (including overlapping dispositions, location of deficiency, comparable condition off-site)
<input type="checkbox"/>	Survey plans
<input type="checkbox"/>	Detailed Site Assessment (DSA), including combined assessment tool (CAT) and record of observation (RoO) and any supporting reports (e.g., Phase I Environmental Site Assessments, previous DSAs)
<input type="checkbox"/>	Aerial photographs
<input type="checkbox"/>	Construction records
<input type="checkbox"/>	Pre-disturbance biophysical information
<input type="checkbox"/>	Other:
<input type="checkbox"/>	Other:
<input type="checkbox"/>	Other:

Background Information (Optional)

Site Overview

Operator							Criteria
Unique ID/ License #							Forested
Facility and Disposition							
Land Use		Surface Legal Land Locations(s) (Furthest Extent)					
Provincial Land Use Area	Choose an item.	Qtr	LSD	Sec	Twp	Rng	Mer
Provincial Land Use Type	Choose an item.						
Grazing Lease (Yes/No)							
Ecological Land Classification		Soil Classification					
Natural Region		Soil Order(s)					
Natural Subregion		Soil Great Group(s)					

Nearby Populated Area(s)		Overlapping Dispositions (if applicable)
Name	Distance (km)	

Facility Information

Facility		UTM Coordinates (NAD83)			Dimensions (m x m)	Ecosite Phase(s)	Soil Series
		Zone	Easting	Northing			
1							
2							
3							
4							

Background Information (Optional)

Site History Information

	Facilities	Survey Date	Construction Date	Abandonment Date	Reclamation Date	Revegetation Date
1						
2						
3						
4						

Detailed Site Assessment Information (if available)

Facilities		Category Failed (Yes/No)			
		Landscape	Vegetation	Level 1 Soil	Level 2 Soil
1					
2					
3					
4					
Landscape Assessment Date		Soils Assessment Date		Vegetation Assessment Date	
Additional Site Biophysical Information					
Evidence of Third-party Use					
Other Comments					