

Updates to Log Branding and Painting Requirements

David Lawrence, Timber Sale Administration Specialist, FS-R3

What does this work respond to?

- Legal requirements
- Forest Service national policy
- Feedback from purchasers, contractors, and subcontractors

What was done?

Coconino County Commissioner submitted efficiency recommendations in August, 2018

Regional Forester committed to developing a new waiver in December, 2018

Waiver made available in the Region in March, 2019

Waiver formally announced by letter in July, 2019

Region requested a policy deviation from the Washington Office for additional relief of branding and painting in October, 2019

Painting &
Branding



The Nature
Conservancy



NAU NORTHERN
ARIZONA
UNIVERSITY

Ecological Restoration Institute

What worked well?

- Learn from other projects
- Accelerated Response Review

Key points for implementation

Waivers are not automatic, universal, or permanent.

As defined in 36 cfr 223.195:

- Decision is made by the Contracting Officer on a case-by-case basis
- Purchaser must certify no prior export within 5 years
- Waiver applies only to logs being processed locally
- Waiver will be revoked if circumstances change

CO Decision is an analysis of both export and theft risk

Recommendations

- Use of electronic load ticketing with tags may improve load accountability and reduce the need for painting and branding
- Make proactive waiver determinations when practical