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TO: Katherine Daniels, AICP, Farm and Forest Lands Specialist
    Oregon Department of Land Conservation and Development

RE: Primary Processing of Forest Products – Definition, Rule Amendment

Thank you for the opportunity to provide public comment. Based on and specifically related to Statewide Planning Goals for Forest Lands, the following comments are offered for consideration.

1. **Primary processing of forest products** be considered the initial treatment of harvested timber (forest products), such as debarking, chipping, drying, and cutting logs to length, to enable shipment to market, and:

   A. The timber (forest product) be grown and harvested on the land or contiguous land where primary processing occurs (not be imported);
   B. Chemical treatment of harvested timber (application of sapstain chemicals, pesticides, preservatives, wood-surface enhancers, and other industrial chemical treatments) not be considered “primary processing”, and not be allowed in the forest zone.

2. **Primary forest products manufacturing**, or “wood products manufactured directly from timber”\(^1\), such as lumber, plywood, veneer, posts and poles, pilings and timbers, shakes and shingles, and products made from chipping, grindings, and mill residues\(^2\) (often referred to as secondary processing), not be considered or included as “primary processing”, and:

   A. Such manufacturing be limited to abandoned mill sites and the industrial zone;
   B. Importing of timber (characteristic of a mill) be allowed at abandoned mill sites and in the industrial zone.

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\(^2\) Ibid.
C. Chemical treatment be allowed in the industrial zone and possibly at abandoned mill sites where natural features, such as streams and rivers, residences, water-source watersheds, protected wildlife habitat, recreation sites, and other at-risk features are not present.

3. Secondary products manufacturing, or “goods made from primary products”\(^3\), such as windows, doors, trusses, and furniture\(^4\), not be considered “primary processing”, and such manufacturing be limited to the industrial zone.

4. Permanent facility for primary processing of forest products be:

   A. Limited to abandoned mill sites and the industrial zone where harvested timber can be imported, and operations can occur continuously (on a permanent basis);
   B. Limited to forest lands of such size and on-site resource production that necessitate the need for a permanent facility, and that provide adequate buffer space from nearby and adjacent forest land uses, and other zoned uses.

In a recent LUBA ruling (Fritch v. Clackamas County, No. 2012-094), LUBA stated that manufacturing is not an allowed use in the forest zone. Therefore, a definition of primary processing that is narrow, not broad, in scope would seem appropriate, and would best support the Statewide Planning Goals for Forest Lands.

Thank you for this opportunity to comment.

Sincerely,

Robin Jacobs

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\(^3\) Ibid.
\(^4\) Ibid.