

MEMO

TO: Forest Primary Processing RAC
FROM: Katherine Daniels, DLCD
SUBJECT: Input from County Planning Directors
DATE: November 10, 2014

Following are the questions I asked of the county planning directors and the responses that I received:

1. **Is “primary processing of forest products” a use that has generated any concerns/difficulty/challenges for your county either in the approval of such uses or on-the-ground impacts of such uses?**
2. **Does your county have a definition for “primary processing of forest products” in forest zones? If so, would you share it?**
3. **If your county does not have a definition for this term, what types of processing (and any parameters) do you believe should be included in a definition of “primary processing of forest products?”**

Katherine,

My answers to your questions are as follows:

1. No challenges or issues.
2. No separate definition in our land use regs.
3. Parameters should be limited to wood "primary" processing facilities--mills, chippers, etc.--not "secondary " processing like log home building, furniture building, etc. which belong in an industrial zone.

Hanley Jenkins

Union County Planning Director

See below. The following is some suggested language for primary processing that Keith Cubic, Hanley and I kicked around with Mark Nystrom a few months back. Just something for your consideration.

Mike McCallister

Clackamas County Planning Director

“Primary Processing” (an alternative to LC 18 2014)

This concept is being circulated in follow-up to the AOC conference call on 5/23/14. In the discussion we identified several key issues including:

1. Processing log home components
2. Permitted v. conditional uses in forest zones

3. Statute v. OAR
4. Clackamas County decision on primary processing
5. Definitional options, forest product v. primary processing
6. Industrial uses v. forest uses and overall land use impacts and process

Add a definition to the OAR 660.006.0005 of Primary Processing.

Primary Processing: A site or facility for primary processing of forest products. Primary processing of forest products means the use of portable or temporary chippers, stud mill or similar equipment for initial treatment or shaping, notching and fitting of logs for log home assembly, to facilitate shipment for further processing or to a final construction site. Forest products, as used in this section, means timber or other resources grown upon the land or contiguous units of land where the primary processing facility is located or a locationally dependent forest land site to the timber or other resources location.

OAR 660.006.0025 Uses authorized in forest zones is abundantly clear. It provides a clear distinction between temporary 0025 (3) (a) and permanent 0025 (4) (a) facilities. It provides an appropriate review process for the difference. The addition of a definition of primary processing will add clarity to the OAR administration and can resolve the log home assembly issue.

Katherine,

There's been some conversation about your inquiry and from the Morrow County perspective I would share that it appears we are trying to regulate all because of one. To me that is bad precedent. My request would be for this effort to cease and for the status quo to be retained. These decisions need to remain local. We can't afford to have forest practices further limited or restricted. If, during the model code process, there is opportunity to better define activities that might be appropriate. But they can't be further limited. They need to be expanded!

Carla McLane

Morrow County Planning Director

I agree with Austin and Carla. I would like to know more, and would like to see such decisions kept local.

Harold Black

Wallowa Co. Planning Director

I am also a strong proponent of local decision making; however, in this case where the case law has been made it would appear that rulemaking might actually make it easier to permit some of the industries that we would like to see in the forest zones.

I know that we are attempting to establish a biomass campus and need an expansive definition of what type of businesses we could attract. Having some certainty would be extremely helpful. I would be in favor of allowing just about any industry where the primary component of their product begins with raw logs (or other forest products such as mushrooms).

Mike Benedict

Hood River County Planning Director

Good discussion. Can we add this to the AOC agenda? If we do not have a pd on the committee, we should give Mark Nystrom some specific feedback.

Tamra Mabbott

Umatilla County Planning Director

Katherine,

Here is my probably unhelpful response to the forest questions:

1. Is “primary processing of forest products” a use that has generated any concerns/difficulty/challenges for your county either in the approval of such uses or on-the-ground impacts of such uses? [No](#).
2. Does your county have a definition for “primary processing of forest products” in forest zones? If so, would you share it? [Uh, no](#).
3. If your county does not have a definition for this term, what types of processing (and any parameters) do you believe should be included in a definition of “primary processing of forest products?” [I can't speak from any experience here](#).

Holly Kerns

Director, Baker City & County Planning Department

1. Is “primary processing of forest products” a use that has generated any concerns/difficulty/challenges for your county either in the approval of such uses or on-the-ground impacts of such uses?

In Wasco County no. There is little to no primary processing of forest products. However, we are looking at entertaining a goal exception to allow this use on EFU zoned land (down near Pine Grove / Kehneeta). Already involved Jon to garner some preliminary thoughts from DLCD.

1. Does your county have a definition for “primary processing of forest products” in forest zones? If so, would you share it?

We have no definitions of primary processing, processing, forest products. However, “Permanent facility for the primary processing of forest products” is listed as a uses allowed through a CUP. WC LUDO Section 3.120.F.1.

3. If your county does not have a definition for this term, what types of processing (and any parameters) do you believe should be included in a definition of “primary processing of forest products?”

Ah – the wonderful world of wood. Even with a degree in forestry (from the University of Idaho) I don’t think I have a good answer. I would try and define product and processing in the definition:

Product: Give examples of forest products (commodity, speciality and differentiated).

Processing: It is divided into two segments: (1) primary processing, and(2) secondary processing. **Primary processing** is the sawing, chipping, or slicing of the log to convert it into lumber or other raw wood products. Examples of primary processing would be sawmilling to produce pulp and paper, veneer, plywood, or particleboard. Some products need additional manufacturing before use, such as making furniture from lumber, particleboard, and plywood. Other examples include producing cardboard boxes or bags from paper, or making flooring from lumber. This is called **secondary processing**.

John Roberts, AICP

Planning Director, Wasco County Planning Department

Hi Katherine,

For all the timberland in Klamath County, we have not had requests for any new processing of forest products in the 5 years that I’ve been here, but here is my response to the following questions:

1. Is “primary processing of forest products” a use that has generated any concerns/difficulty/challenges for your county either in the approval of such uses or on-the-ground impacts of such uses?

This use has not generated any concerns, difficulties or challenges in the last 5 years.

2. Does your county have a definition for “primary processing of forest products” in forest zones? If so, would you share it?

We do have a definition as follows: “The use of a portable chipper or stud mill or other similar method of initial treatment of a forest product in order to its shipment to market.”

3. If your county does not have a definition for this term, what types of processing (and any parameters) do you believe should be included in a definition of “primary processing of forest products?”

NA

Mark Gallagher | Interim Planning Director | [Klamath County Planning Department](#)