

Suzanne I. Piland
10465 SW Miller Court
Tualatin, OR 97062
pilands@frontier.com
503-692-0480

October 26, 2014

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

SUBJECT: Comments to the Rules Advisory Committee
for **Primary Processing of Forest Products**

I ask that the committee adopt a rule amendment to define “primary processing of forest products” which includes the following stipulations:

1. Secondary processing of forest products begins when logs are chemically treated, and/or when electrical openings and chases are cut and drilled.
2. Primary processing of forest products does not include the partial construction of log homes, including custom notching and shaping of log ends to form the interlocking components of the walls of a log home, in accordance with Oregon Court of Appeals decision A 155308 dated January 29, 2014; LUBA Decision No. 2012-094 dated September 16, 2013; and Clackamas County Hearings Officer decision dated November 26, 2012, regarding Mark Fritch vs. Clackamas County.
3. Appropriate setbacks for secondary processing of forest products, including no less than ¼ mile from property zoned for residential use, including RRF5; fish-bearing streams and rivers; scenic rivers and byways; parks and recreation areas.
4. Oversight of use of chain saws, heavy equipment, and toxic chemicals, as legally required in Oregon forest zones for permitted logging operations, particularly during fire season.

In 1991 the Oregon Legislature created the Oregon Forest Resources Institute (OFRI) to enhance collaboration among forest scientists, public agencies, community organizations, conservation groups, and forest landowners; to provide objective information about responsible forest management; and to encourage environmentally sound forest practices through training and other educational programs. In an OFRI publication titled “The 2012 Forest Report,” the most comprehensive definition of primary, secondary, and tertiary wood products manufacturing was outlined. On page 33 of the report it says: “Secondary manufacturing...includes all industries that use primary wood products in their manufacturing operations. These include sawmill residuals and chips, millwork and cut-stock, wood containers and pallets, log homes, timber-framed homes, pre-built wood sheds, and mini-barns and wood furniture.”