



## Murphy Company

August 30, 2022

Mr. Jamie Barbour, Assistant Director  
Ecosystem Management Coordination  
USDA Forest Service  
Washington, D.C. 20250

RE: Request for Information (RFI) on Federal Old-growth and Mature Forests, 87 Fed. Reg. 42,493 (July 15, 2022); Docket Number: 2022-15185

Dear Mr. Barbour:

Thank you for the opportunity to respond to the Request for Information (RFI) captioned above. Murphy Company is a third-generation wood products company. Founded in 1909, Murphy Company operates facilities in Western Oregon and Washington. Headquartered in Eugene, Oregon, Murphy employs approximately 900 people and is a leading producer of hardwood and softwood plywood, laminated veneer lumber (LVL), and softwood veneer in the Pacific Northwest. Murphy Company operates two veneer plants in Oregon, and one in Elma, Washington that are strategically located and depend on timber supply from Federal forests that supply high-strength Douglas-fir veneer, which is critical to the manufacturing process at our engineered lumber and plywood facilities. The timber offered from the Federal Forests into the marketplace generates logs critical for maintaining the milling infrastructure in small communities where our mills are located, and jobs are a key piece of the economic stability of the community.

Murphy Company strongly supports the Biden Administration's ambitious goals of dramatically increasing the pace and scale of science-based, active forest management to reduce the risk of catastrophic wildfires, to protect at-risk communities and vulnerable populations, and improve the health and resiliency of our federal forests. We have to be extremely careful and creating a definition of what qualifies a forest for the label of "Old Growth," or "Mature Forests" without first understanding what problem we are trying to solve. Environmental activists are trying to define "Mature Forests" so that the only outcome is long term reserve and off limits to management even if the basis for science-based management is needed for the protection of that forest and it's continuation of providing mitigation to negative climate impacts. "Manage Mature Forests" are present on countless federally owned acres in the Pacific Northwest and

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their ongoing ecological, social, and economic contributions to our society can not be understated. The definitions of “Old Growth” and “Mature Forests” cannot exclude management and solely recognize permanent reserve as the only option.

The timber outputs of sustainable management from Federal Forests will continue to provide family wage careers for rural communities of the Pacific Northwest. It cannot be forgotten as well sustainable management will provide positive outcomes such as forest resilience, forest restoration, fuels management and equal and equitable access for all. We have seen an evolution of values communities have on stable work environments and the result on the social fabric within those. For example, in some rural communities (where much of the commercial timber harvest takes place) there is a growing focus on results from deteriorating family wage jobs and the negative impacts to society where the promise of these jobs being replaced by other industries, such as recreation, never materialized. These concerns are further reflected in the growing political challenge of supporting families in these communities where high unemployment rates are a direct result of the deterioration of all industry. There are many communities that have lost their local employment base and have turned into second home communities for people from urban areas like Portland. In these areas specifically, unemployment is up, crime is up, poverty is up, and real estate values continue to climb creating a massive wealth gap with the residents and those recreating from urban areas. There are very few jobs left that can justify the cost of living in these rural communities and little hope of any good times ahead.

It is also important to note that for many of Oregon’s small, natural resources based local economies, efforts (both federal and state assisted) to “transition” timber-dependent communities to services industries, including recreation and tourism, have been major failures in creating economic opportunity, equity, diversity, and inclusion. Social, economic, and educational indices show significant inequality in quality-of-life metrics between rural and urban Oregon communities.

A one sized fit all approach has not been the best for outcomes in the forest products industry. Sustainable harvest practices and policies will give the timber companies certainty to continue. The activist groups seem to see regulations that reduce acres allowable for harvests as a win regardless of the unforeseen impacts to the forestlands themselves. Sustainably managed forests in the Pacific Northwest have never completely been recognized for the long-term ecological benefits that they provide; clean water, clean air, wildlife habitat, carbon benefits, and sustainable “green” jobs. They have too often been portrayed instead as a threat and not a benefit to the environmental agenda.

To bring long lasting benefit to the Pacific Northwest we need to recognize the need for regulations that can be tiered to benefit landowners that have policies to manage forests for longer rotations with non-declining inventories. The Federal Forests in the Pacific Northwest have higher mortality rates and lower harvest outputs than their sustainable capability. To change this trajectory and put these forests on an alternative trajectory where harvest is absolutely perceived as negative to climate change is tone deaf to the communities they support. These forests are regarded for the quality they bring to the ecological functions they provide, and the fact is that management in the way it has occurred is why they are what they are. To change

the objectives and goals of these forests could lead to unintended consequences where the ending ecological function is far worse than where it is today. There is an ongoing argument that we need to exclude human impacts to older forests and put them in permanent preservation. Forests are an extremely dynamic ecosystem that are impacted by the presence of humans and we have to balance the extreme positions so that the management and conservation has the greatest total positive outcomes for our environment and our culture.

Responsible and sustainable management of our federal forests is part of the solution to 21<sup>st</sup> Century economic, social, and environmental challenges in Pacific Northwest. In fact, public and federal forests are the most realistic land base available to substantially increase timber outputs to support and grow the remaining timber infrastructure and continue providing a positive contribution to the environment when compared to other uses or those practiced producing the same products in regions of the world with little regard to any ecological impact. Combined, the federal owns and manages more than half of the forests in the Pacific Northwest, including the most at-risk forested acres that pose a significant threat to property, life, and public safety. Unmanaged forests are burning up at an alarming rate, impacting the most vulnerable populations; devastating renewable resources, wildlife, clean water and air; and undermining business operations.

The activist environmental community is continually moving the goalposts and looking for shards of skewed science to fit an agenda where changing values about the use of our forests and our lack of institutional capacity to manage this change. The new approach is applied science where the baseline is an earth where there is no human interaction. Human society has developed, and the impacts can be debated, but there should be no zero-impact science assumption. Humans are not a zero impact species and our interaction with our natural world needs to be adaptive to changes and keep in mind the interaction of all forces on the planet. Science needs to demonstrate where balance can occur and collaborative effort from true stakeholders can define where the least impacts to all aspects of society, including social, ecological, climate, and many others, can be weighed. We rarely consider or evaluate the impacts of *not* taking action.

Murphy Company appreciates the opportunity to comment on the Request for Information (RFI) on Federal Old-growth and Mature Forests, 87 Fed. Reg. 42,493 (July 15, 2022); Docket Number: 2022-15185. We are appreciative that the administration is being careful in all its assumptions to maintain a viable industry in the rural communities of the Pacific Northwest while perpetually managing the federal forests for the greatest societal benefits. The decisions made on the trajectory of these forests is critical to our nation's future as a provider of raw materials for our societies needs and all the ecological contributions managed forests provide. The debate over the importance of these issues will continue. There is often a failure within the environmental advocacy industry to recognize these values are *already* shared by most and have long been practiced by those working within the timber industry, creating an "either/or" conflict rather than appreciating that working forests are an "and/in addition to" asset. These values are the future of management decisions and will shape and guide the view of forest management worldwide

Thank you for your consideration of these comments and your careful thought in the future of our Federal Forests.

Sincerely,

A handwritten signature in blue ink that reads "L. Knox Marshall". The signature is written in a cursive style with a large, stylized initial "L".

L. Knox Marshall  
Vice President Resources  
Murphy Company