

**File Code:** 1900 (8594551)  
**Date:** JAN 14 2020

Mr. Norman Pillen  
Chairman  
Seafood Producers Cooperative  
2417 Meridian Street  
Suite 105  
Bellingham, Washington 98225

Dear Mr. Pillen:

Thank you for your letter of December 17, 2019, to U.S. Department of Agriculture Secretary Sonny Perdue and me regarding the Alaska Roadless Rule on the Tongass National Forest. Secretary Perdue has asked me to respond. I appreciate your input and the economic benefits the commercial fishing industry has brought to the State of Alaska.

Our goal is a State-specific rule that addresses economic development, conservation, and other needs for this and future generations.

Your comments will be entered into the public record. All comments will be taken into account as we move forward to develop a final Rule.

Thank you for participating in this process and your interest in the management of America's National Forests. Please share this response with your colleagues.

Sincerely,

  
VICTORIA CHRISTIANSEN  
Chief





# SEAFOOD PRODUCERS COOPERATIVE

PRODUCERS, PROCESSORS & MARKETERS OF PREMIUM QUALITY SEAFOODS

2417 Meridian Street, Suite 105 • Bellingham, WA 98225  
(360) 733-0120 • spc@spcsales.com • www.spcsales.com

November 11, 2019

The Honorable Sonny Perdue, Secretary  
U.S. Department of Agriculture  
1400 Independence Ave., SW  
Washington, DC 20250

Ms. Vicki Christiansen, Chief  
U.S. Forest Service  
1400 Independence Ave., SW  
Washington, DC 20250

**Dear Secretary Perdue and Chief Christiansen:**

As representatives of Seaford Producers Co-Operative, we would like to address the proposed exemption of the Tongass Roadless Rule and its potential effects on our members. We are the largest and longest operating member-owned seafood cooperative in Alaska, with 539 active members, and a processing plant in Sitka, Alaska employing over 100 workers and staff at peak salmon production. We are an organization made up of commercial fishing family operations, many of which are generational, including trollers, gillnetters, seiners and longliners. All are dependent on salmon fisheries to sustain their livelihoods. Salmon is our lifeblood. The future of our Co-op, our membership, and our ability to feed our families and the American consumer, all depends upon the salmon population's continued existence. The importance of healthy, intact watersheds and healthy salmon spawning habitat is paramount to the continued productivity of our fisheries. We urge you to protect the salmon habitat on the Tongass National Forest by including protections for the top salmon producing watersheds as outlined in the 2016 Tongass Land Management Plan in the new Alaska Roadless Rule.

Alaskan salmon populations are an amazing example of nature's ability to provide one of the most natural, bountiful, sustainable, healthy and delicious resources on the planet, given the chance to reproduce in the clean and undisturbed spawning grounds of the Tongass Forest. We all need to recognize the importance of that resource and act on its protection and sustainability for future generations.

Opening up the Tongass to a full exemption alternative would harm one of Southeast Alaska's most important economic drivers - the commercial fishing industry. The commercial seafood harvesting and processing industry is one of the region's two largest private sector economies, with the other being comprised of the visitor industry. One in ten jobs in the region is in the seafood industry, and the industry is responsible for contributing 10% of all regional employment earnings. This means jobs for 13,500 individuals and \$321 million in labor income in our region alone, according to a 2013 McDowell

report on the Economic Value of the Alaskan Seafood Industry<sup>1</sup>. Furthermore, according to the Alaska Sustainable Fisheries Trust's 2019 Seabank Report, economists estimate the total impact of Southeast Alaska's commercial fishing and processing jobs to be in excess of \$700 million annually<sup>2</sup>. In a region of about 70,000 people and limited economic opportunities, these economic contributions are extremely significant - and they are extremely threatened by an administration that prioritizes clearcuts over stream restoration. A full-scale exemption from the 2001 Roadless Rule stands to sacrifice the vast economic contributions of the commercial fishing industry and the viability of thousands of small businesses like ours for the short-term gain of a handful of timber jobs. This trade-off does not make fiscal sense.

We at SPC would ask that you please consider the potential for the disastrous effects on the salmon resource the proposed exemption of the 2001 Roadless Rule may have on this resource. We ask you to please protect our livelihoods and Alaska's salmon spawning grounds by choosing an alternative that protects the salmon habitat, continues the phase-out of industrial scale old growth clear-cutting, and prioritizes the restoration of degraded watersheds and streams. This is vital, not only to our company and its membership but to all Alaskans, US, and worldwide consumers who would like the choice of healthy and sustainable wild salmon on their plates.

Thank you for your consideration.

Sincerely,

Norman Pillen	Chairman
Lance Preston	Secretary
Joe Morelli	CEO & President

Seafood Producers Cooperative  
507 Katlian Ave  
Sitka AK 99835

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<sup>1</sup><https://www.mcdowellgroup.net/wp-content/uploads/2017/10/ak-seafood-impacts-sep2017-final-digital-copy.pdf>

<sup>2</sup> <http://www.thealaskatrust.org/seabank-annual-report-web>



SEAFOOD PRODUCERS COOPERATIVE  
2417 MERIDIAN STREET #105  
BELLINGHAM, WASHINGTON 98225

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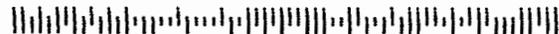
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The Honorable Sonny Perdue, Secretary  
U.S. Department of Agriculture  
1400 Independence Ave., SW  
Independence Ave., SW  
Washington, DC 20250

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