

Fairbanks
5/29/18

May 29, 2018



DENNIS MOEN
Business Manager/
Secretary-Treasurer

TODD PELOW
President

HEADQUARTERS
2510 Arctic Blvd.
Anchorage, Alaska 99503
FAX (907) 279-7171
(907) 276-7211

2122 Airport Way
Fairbanks, Alaska 99701
FAX (907) 456-1771
(907) 452-5024

722 West 9th Street
Juneau, Alaska 99801
FAX (907) 586-5757
(907) 586-6993

Attn: Coastal Plain Oil and Gas Leasing Program EIS
222 West 7th Avenue, #13 Anchorage, Alaska 99513
Submitted via email: blm_ak_coastalplain_EIS@blm.gov

Subject: Request for review in EIS of economic benefits of project labor agreements for construction related to the Coastal Plain Oil and Gas Leases

Dear Ms. Hayes:

Public Employees Local 71 (Local 71) is a labor organization representing almost 2,400 working men and women employed with Labor, Trades, and Crafts positions in Alaska. Our Members are employed in positions supporting operations and maintenance along the transportation corridor and at state airports.

Please accept our comments relative to the open public scoping process for the Coastal Plain Oil and Gas Leasing Program Environmental Impact Statement (EIS). Local 71 requests that the EIS include analysis of the economic and social benefits of project labor agreements related to the Coastal Plain oil and gas leasing and future development.

Future development in this region brings expectations of increased job opportunities for our Members.

Local 71 encourages consideration of the economic and community benefits of using project labor agreements (PLA) for major construction resulting from oil and gas leasing on the Coastal Plain as many public and private sector owners in Alaska have done for complicated projects with time-sensitive construction schedules. For example, two projects successfully completed with recognition for safety and schedules utilized PLAs. The Nome Area Sites Remediation Project and the Ground-Based Midcourse Defense Segment Project at Fort Greely achieved success through a project-wide labor agreement. The prime contractors for the Fort Greely project, Bechtel and Fluor, attribute their ability to complete this project on budget and ahead of time with outstanding safety records to the effective use of a PLA. Additionally, the project utilized a high number of local contractors and workers. Based on similar benefits, PLAs have been used on major projects such as the \$9 billion Trans Alaska Pipeline System, the \$2 billion Prudhoe Bay Project, the Prudhoe Bay East Oilfield Development Project, the Healy Clean Coal Plant, the ENSTAR Pipeline, the City of Nenana Sewer and Water Project, the Fort Knox Gold Tailing Storage Facility, and the remodeling project at Lathrop High School in Fairbanks.

Owners use PLAs as a strategic management tool to establish baselines for all contractors and workers on a project, assisting the construction manager in coordination of work and establishing streamlined transitions for new contractors and subcontractors.

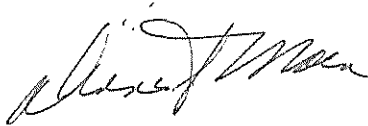
PLAs increase the efficiency of project management by decreasing the uncertainties associated with large, complex construction projects.

Local 71 supports the rationale for use of PLAs for projects related to the Coastal Plain oil and gas leasing and development contained within the comments provided by Local 942, including:

- Cost savings;
- Consistency;
- Efficiency;
- Risk Minimization;
- Safety;
- Provision of highly skilled and qualified workforce;
- Increased training opportunities for residents;
- Promoting prosperity for Veterans, families, and local economies;
- Prohibition of work disruptions;
- Efficient dispute-resolution procedures;
- Promotion of cooperation, communication, and stakeholder commitment.

For these reasons, Local 71 requests that the EIS include analysis of the economic and social benefits of PLAs for oil and gas development on the Coastal Plain including the best mechanism to ensure the use of such agreements.

Thank you for this opportunity to comment on behalf of our membership,

A handwritten signature in black ink, appearing to read "Dennis Moen", written in a cursive style.

Dennis Moen
Business Manager Secretary-Treasurer of
Public Employees Local 71 and
Alaska District Council of Laborers