



# LIUNA!

August 26, 2022

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Ms. Stephanie Rice  
Project Lead  
Alaska State Office  
Bureau of Land Management  
222 West Seventh Avenue, #13  
Anchorage, Alaska 99513

RE: Willow Master Development Plan  
for the Supplemental Draft Environmental Impact Statement

Dear Ms. Rice:

On behalf of the 500,000 members of the Laborers' International Union of North America (LIUNA), I submit the following comments in response to the Supplemental Draft Environmental Impact Statement (SEIS) for the Willow Master Development Plan (MDP). LIUNA applauds the Bureau of Land Management for completing this SEIS, as it is an important and necessary step for Willow MDP to move closer to the project's construction phase and put LIUNA members to work. LIUNA supports the Willow MDP because of what it means for our nation's energy independence, local and state economies, and, most importantly, what it means for the hard-working LIUNA members in Alaska.

LIUNA members work throughout North America, predominantly within the construction industry. From highways and bridges, to tunnels and skyscrapers, our members work every day, building America. One sector, in particular, that has provided substantial workhours for our members is our nation's energy industry. Specifically, our oil and natural gas infrastructure. The oil and natural gas industry has employed thousands of laborers, which has led to tens of millions of construction workhours for LIUNA members.

Because construction jobs are inherently temporary by nature, LIUNA members must move from job to job, banding together project after project to create construction careers. As noted in the SEIS, Willow MDP can employ over 1,000 construction workers yearly for the roughly 7 years it will take to construct. This will result in millions of work hours for LIUNA members. These are good union jobs with family-supporting wages and benefits.

*Feel the Power*

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The work required for the construction of Willow MDP is work that our members are already trained to do. Infrastructure such as gravel and ice roadways, bridges, several hundred miles of pipelines, and the construction of airstrips and mine sites. Union apprenticeship training programs provide our workers with the best, high-skilled training within the construction industry. Combined with decades of experience, our workforce is second to none. This helps ensure that Willow MDP will be built correctly, on time, on budget, and with the least environmental impact. Developing Willow MDP is essential for our nation's national security and global competitiveness within the energy industry. Producing domestic energy supports American jobs while reducing the need to import from foreign countries.

ConocoPhillips completed its first Environmental Impact Statement (EIS) in 2020. Alternative B was the desired decision. There was, however, strong pushback due to environmental and habitat concerns. That concern led a federal judge to ultimately void the project's necessary permits in 2021, which triggered ConocoPhillips to conduct a second EIS. The 2022 SEIS added a new alternative, Alternative E, which addresses these issues. Alternative E downsizes the number of drill pads from five to three. In addition, it reduces the total area needed for surface infrastructure, thereby decreasing the amount of gravel, freshwater, and wetlands necessary for the project. Alternative E also relocates Bear Tooth drill site 5 (BT5), addressing potential environmental impacts with respect to wildlife.

On behalf of our members in Alaska and across North America, I thank the Bureau of Land Management for the opportunity to comment on this important project and for their hard work on this SEIS. LIUNA supports the Willow MDP and asks that BLM approve the Supplemental EIS and Record of Decision (ROD). Time is imperative, not only for the project itself, as its construction must be performed in the winter months, but also for LIUNA members who are waiting and, hoping, to go to work constructing Willow MDP.

With kind regards, I am

Fraternally yours,

  
TERRY O'SULLIVAN  
General President

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Attachment