

## Garcia, Jovie

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**From:** Carleta Schroeder <cschroeder@alaskalaborers.com>  
**Sent:** Tuesday, November 14, 2017 10:35 AM  
**To:** PUB-NanushukEIS  
**Cc:** Stevens, Gina; Ellen Lyons  
**Subject:** Support for Nanushuk DP Alternative 2  
**Attachments:** District Council Comment in Support Nanushuk DP Alt 2 .pdf

Dear Ms. Lyons and Corps Staff,

Please see the attached comment letter in **Support for Nanushuk Development Project Alternative 2.**

Thank you,

Carleta R. Schroeder, Office Manager  
Alaska District Council of Laborers  
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Anchorage, AK 99501  
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# ALASKA DISTRICT COUNCIL OF LABORERS

Laborer's International Union of North America  
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## Dennis Moen

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## Joey Merrick

President  
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Business Manager  
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## Scott Eickholt

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Business Manager  
Laborers Local 942

November 13, 2017

U.S. Army Corps of Engineers, CEPOA-RD  
Ms. Ellen Lyons  
2175 University Avenue, Suite 201E  
Fairbanks, AK 99709

Submitted online: <http://nanushukeis.commentinput.com/>

**Subject: Support for Armstrong's (Applicant) Nanushuk  
Development Project on the North Slope 'Alternative 2'**

Dear Ms. Lyons:

The Alaska District Council of Laborers is in strong support of Alternative 2, the Applicant's proposed action, which strikes the proper balance through responsible natural resource development. The U.S. Army Corps of Engineers should approve Alternative 2 to allow Armstrong Energy LLC's Nanushuk project to proceed.

Given that Nanushuk could be one of the largest finds on the North Slope since Alpine and Kuparuk, it has significant potential economic benefits for Alaska. For instance, the Trans-Alaska Pipeline is currently running three-quarters empty, and with the potential to generate 120,000 barrels of oil per day—Nanushuk could help fill the pipeline. This increased throughput would generate revenues for the State that could be used to provide wide-reaching public benefits. The Draft Environmental Impact Statement (DEIS) demonstrates that the Nanushuk Project has the potential to create 1,000 construction jobs and around 200 drilling positions, which would have a multiplier effect in the broader economy. In addition, the DEIS found that the project would probably increase local incomes and revenues in the region, which would, in turn, lead to direct local human health benefits. Based on these substantial economic benefits, the project should move forward as expeditiously as possible.

Alternative 2, the Applicant's proposed action, is the most appropriate option for approval. When comparing the project elements, Alternative 2 has the same or fewer bridges than the other alternatives considered. Alternative 2 also has a similar or shorter length of hydrocarbon pipeline as the other alternatives. Similarly, there is not a major difference between the alternatives in the total gravel footprint; all the project alternatives involve a gravel footprint of over 300 acres.

Each alternative has similar effects on air quality in that, under any scenario, the air quality would meet national and state standards. Each alternative also has similar effects on human health and safety. While Alternative 2 could have slightly higher impacts in terms of the distance in new gravel roads, Alternative 2 would not have the highest impact on subsistence activities. Given the significant local and state economic benefits of the project, Alternative 2 properly balances those economic benefits with other impacts, for which the Applicant has already planned extensive mitigation strategies.

Thank you for the opportunity to comment.

Sincerely,



A.J. "Joey" Merrick II