



LABORERS' INTERNATIONAL UNION OF NORTH AMERICA LOCAL 341



2501 Commercial Drive, Anchorage, AK 99501
Phone (907) 341-0341 Fax (907) 341-0342
www.local341.com

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To Whom it May Concern,

I am writing in response to "Notice of Public Scoping: Alaska DEC Oil Discharge Prevention and Contingency Plan Requirements." I urge DEC not to change its oil discharge prevention and contingency plan requirements at this time.

Laborers Local 341 represents approximately 2,000 members in the construction, oil and gas industries. Many of our members have worked or currently work on Trans-Alaska Pipeline maintenance or on spill response teams. Our members know first-hand there are not "outdated" or "duplicative" requirements or environmental protections in current DEC requirements. Instead, we have barely sufficient spill response with current levels of staff and infrastructure.

I have worked in this industry for a long time, including when the Valdez oil spill occurred. We can never return to an era of such inadequate spill prevention and response. Inadequate safety measures are not just catastrophic for the environment and other natural resource industries such as fishing. They also endanger North Slope production, our state treasury, and the tens of thousands of jobs that are connected to our oil and gas industry.

Maintenance of our oil and gas infrastructure and adequate spill response are absolutely essential to keep oil flowing from the North Slope. Any attempts to shortchange prevention and spill response would be incredibly short-sighted, because when and if such regulatory backsliding resulted in a spill, it would likely shut down production for a longer period of time, put more jobs at risk, and bring greater public opposition to an industry that is so important for our economy.

A strong oil industry in Alaska depends on adequate environmental safeguards so that production can continue. Please do not change oil discharge prevention and contingency plan requirements.

Thank you for your consideration.

A.J. "Joey" Merrick
Business Manager/Secretary Treasurer
Laborers Local 341