

June 26, 2026

Submitted via Public Comment

Washington State Department of Commerce
Interagency Clean Energy Siting Coordinating Council

RE: Comments on the Draft Recommendation Ideas for the 2026 Annual Legislative Report

Dear Members of the Interagency Clean Energy Siting Coordinating Council:

On behalf of the Northwest Region of the Laborers' International Union of North America (LIUNA), that covers Washington, Alaska, Idaho, Montana, Wyoming, Colorado, Oregon, Utah, Nevada, as well as four Provinces in Western Canada, the Yukon, Northwest, and Nunavut territories. This includes the Washington and Northern Idaho District Council of Laborers, six affiliated Local Unions across Washington State, and more than 12,000 hardworking LIUNA members. Thank you for the opportunity to provide comments on the draft recommendation ideas for the Interagency Clean Energy Siting Coordinating Council's 2026 Annual Legislative Report.

LIUNA members are proud to build the infrastructure that powers Washington's economy and supports the state's clean energy future. Our members construct utility-scale renewable energy projects, battery energy storage systems, electrical transmission infrastructure, environmental remediation projects, utility improvements, transportation infrastructure, and other critical public works that are essential to achieving Washington's clean energy goals. As the workforce responsible for delivering this infrastructure, we have a direct interest in ensuring Washington's clean energy policies support not only timely permitting, but also the skilled workforce capacity necessary to successfully build these investments.

LIUNA appreciates the significant work undertaken by the Council to improve the efficiency, transparency, and coordination of clean energy siting and permitting throughout Washington. The draft recommendations reflect thoughtful consideration of many of the barriers affecting project development, including agency capacity, transmission planning, public information, environmental review, developer guidance, and community engagement. We support these efforts and appreciate the Council's continued commitment to improving Washington's clean energy permitting framework.

However, after reviewing both the draft recommendations and the legislative direction provided in Engrossed Second Substitute House Bill 1216 (HB 1216), we respectfully believe the draft recommendations do not fully implement one of the Legislature's central policy objectives: growing Washington's family-wage clean energy workforce.

The Draft Recommendations Do Not Fully Implement the Legislature's Direction

HB 1216 establishes that efficient and effective siting and permitting serves multiple public purposes—not simply accelerating project approvals.

Section 1 of the legislation states that efficient permitting is necessary to:

- Fight climate change and achieve the state's greenhouse gas emission limits;
- Improve air quality;
- **Grow family-wage clean energy jobs and innovative clean energy businesses that provide economic benefits across the state;** and
- Make available secure domestic sources of clean energy products needed to transition away from fossil fuels.

These objectives were intentionally established by the Legislature as complementary pillars of Washington's clean energy strategy. Permitting efficiency, environmental stewardship, economic development, and family-wage job creation were all intended to advance together.

The Council's draft recommendations comprehensively address permitting modernization, agency coordination, planning tools, environmental review, developer resources, and public engagement. However, they contain little discussion of workforce development, registered apprenticeship, construction labor capacity, or strategies to maximize family-wage employment.

As drafted, the recommendations advance permitting reform but do not fully implement the Legislature's broader vision for Washington's clean energy economy.

Workforce Capacity Should Be Considered Critical Infrastructure

The Council correctly identifies permitting efficiency as an essential component of Washington's clean energy transition. However, workforce capacity is equally critical infrastructure.

Washington cannot achieve its clean energy objectives through permitting reform alone. Every utility-scale solar project, battery energy storage system, transmission line, hydrogen facility, pumped storage project, and grid modernization investment ultimately depends upon the availability of a highly trained construction workforce capable of building these facilities safely, efficiently, and at the scale necessary to meet Washington's ambitious energy goals.

Just as the state invests in agency staffing, permitting modernization, environmental review, transmission planning, and project coordination, it must also invest in the workforce responsible for constructing this infrastructure.

Without sufficient workforce capacity, permitting efficiencies alone cannot deliver the clean energy deployment envisioned by HB 1216.

Registered apprenticeship programs are the primary pipeline for developing the skilled construction workforce required to build Washington's clean energy future while creating family-wage careers that support working families and strengthen local economies. As demand continues to grow for renewable energy generation, battery storage, electrical transmission, hydrogen development, and grid modernization, workforce shortages have the potential to become as significant a barrier to project delivery as permitting delays.

Yet the Council's draft recommendations contain no recommendations focused on workforce readiness, apprenticeship expansion, construction labor capacity, or long-term workforce planning.

Workforce Development Is Central to the Legislative Intent of HB 1216

The Legislature repeatedly recognized workforce and economic development as core objectives throughout HB 1216.

Applicants seeking designation as a Clean Energy Project of Statewide Significance must demonstrate how projects will contribute to Washington's economic development goals, including anticipated employment levels, employee wages, and new job creation.

Likewise, Section 307 directs the Department of Commerce to evaluate how clean energy policies, investment programs, and Energy Facility Site Evaluation Council (EFSEC) processes can more equitably distribute costs and benefits to rural communities. The Legislature specifically requires Commerce to evaluate **direct, indirect, and induced jobs in construction and operations**, demonstrating that workforce outcomes are intended to be a meaningful measure of successful clean energy policy—not simply an ancillary benefit.

The Legislature further recognized throughout HB 1216 that successful clean energy deployment requires coordination among state and local governments, tribal governments, communities, workers, clean energy developers, and other stakeholders. Workforce development was never intended to be separate from permitting reform; rather, it is an essential component of successful implementation.

Community Benefits Should Include Workforce Development

LIUNA supports the Council's recommendation to advance Community Benefit Agreements and appreciates the recognition that host communities should benefit from clean energy development.

However, the draft recommendations primarily describe community benefits in terms of negotiated financial investments and community improvements.

We encourage the Council to explicitly recognize that one of the most significant and enduring community benefits generated by clean energy development is the creation of family-wage careers, registered apprenticeship opportunities, and long-term workforce development.

Unlike one-time financial contributions, investments in apprenticeship and workforce development create lasting economic value by developing skilled workers, increasing household incomes, strengthening local tax bases, supporting local businesses, and ensuring communities continue benefiting from clean energy investments long after construction is complete.

As Commerce develops best practices for Community Benefit Agreements, workforce development and apprenticeship opportunities should be recognized as foundational community benefits that directly advance the Legislature's intent to grow family-wage clean energy jobs.

Rural Communities Benefit Most When Projects Build Local Careers

Section 307 of HB 1216 directs the Department of Commerce to identify ways to more equitably distribute the costs and benefits of clean energy development within rural communities.

For many rural communities, one of the most meaningful and enduring benefits associated with clean energy development is the opportunity to create family-wage construction careers through registered apprenticeship and skilled trades employment.

These projects provide local residents opportunities to enter lifelong careers, earn family-supporting wages, and continue contributing to Washington's infrastructure economy long after a single project has been completed.

As the Council develops recommendations intended to increase the benefits of clean energy investment, workforce development should be recognized as one of the most effective strategies for ensuring rural communities realize lasting economic opportunity rather than only temporary project activity.

Recommendation for the Final Report

LIUNA respectfully recommends the Council include an additional recommendation dedicated to workforce development:

Recommendation 14 – Develop a Statewide Clean Energy Workforce Strategy

The Council should recommend that Commerce, EFSEC, the Department of Labor & Industries, workforce development boards, labor organizations, registered apprenticeship programs, community and technical colleges, utilities, contractors, project developers, and other stakeholders collaborate to:

- Assess projected workforce demand associated with Washington's clean energy transition.
- Identify anticipated workforce shortages by occupation and geographic region.
- Expand registered apprenticeship and pre-apprenticeship opportunities to meet future workforce needs.
- Increase pathways into family-wage clean energy careers, particularly in rural communities.
- Coordinate workforce planning alongside permitting modernization to ensure Washington has sufficient construction capacity to successfully deliver future clean energy infrastructure.
- Incorporate workforce metrics—including apprenticeship utilization, construction employment, operations employment, and career advancement—into future evaluations of Washington's clean energy strategy.

Conclusion

HB 1216 recognizes that Washington's clean energy transition is not solely an environmental initiative—it is also an economic and workforce initiative. The Legislature intentionally paired climate policy with family-wage job creation because it understood that public support for clean energy depends upon communities sharing in its economic benefits.

The Council's draft recommendations provide meaningful improvements to permitting efficiency, planning, coordination, and community engagement. However, without corresponding recommendations addressing workforce development, registered apprenticeship, construction labor capacity, and family-wage job creation, the recommendations fall short of fully implementing the Legislature's vision.

LIUNA respectfully urges the Council to revise the final report to recognize workforce development as a core pillar of Washington's clean energy strategy, alongside permitting modernization, environmental stewardship, tribal consultation, and community engagement. Doing so will better reflect both the letter and the intent of HB 1216 while ensuring Washington has the skilled workforce necessary to successfully build the clean energy future envisioned by the Legislature.

Thank you for your consideration of these comments and for your continued leadership in advancing Washington's clean energy future.

Sincerely,

Northwest Region of the Laborers' International Union of North America (LIUNA)