

August 9, 2022

Via E-Filing

Attn: Sage Park
Regional Director, SEPA Responsible Official
Goldendale Energy DEIS
Department of Ecology
1250 W. Alder Street
Union Gap, WA 98903-0009

Re: Comments on the Goldendale Energy Storage Project Draft EIS by Laborers Local Union 737

Dear Director Park:

In response to the “State Environmental Policy Act Draft Environmental Impact Statement” for the proposed Goldendale Energy Storage Project, Laborers’ Local 737 submits these comments for consideration.

The Laborers Local 737 represents 2,500 construction workers including many who live and work within commuting distance of the Goldendale Energy Storage Project. Laborers Local 737 has an office in Portland, Oregon and dispatches workers to project sites in southern Washington, including Klickitat County where the pumped-water storage project will be located. Across the region and in Washington, Laborers members are employed on hydroelectric, energy, and infrastructure projects. Laborers members are highly skilled and receive free training, middle-class wages, affordable family health insurance, and a retirement benefit.

Socioeconomic Benefits of the Project

The Laborers urge the Department to include for consideration in the DEIS and account of the socioeconomic impacts related to the Goldendale project. Notably, because the applicant, Free Flow Power Project 101, LLC, has executed a Project Labor Agreement (“PLA”) with the Washington State Building and Construction Trades Council, including the Laborers, the project will be constructed with union construction workers from Washington State and the surrounding area. As a result, the proposed project will create 3,000 high quality construction jobs over a five-year period that pay wages significantly greater than average, offer affordable family health insurance and a pension benefit, and spur reinvestment in the host community and Washington State. Moreover, because the project will span a five-year time horizon, it will provide a critical opportunity for entrants to the construction industry to complete their craft’s multi-year apprenticeship training program, and create a new generation of skilled construction workers needed to build the clean energy infrastructure of tomorrow. In addition, the scope and scale of the project provides a pathway for workers who have historically worked in the fossil fuel sector to equitably transition to the clean energy economy.

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Union labor means construction workers on the project will have access to high quality training which improves worker safety and health outcomes¹ as well as ensure mitigation measures required to reduce environmental impacts are successfully implemented.² The employment of union labor also translates into lower emissions during the construction process because workers will be sourced locally reducing the distance of worker commutes.

Lastly, high quality construction jobs promote equity because they offer a path to the middle-class for workers who lack a college degree, and are from underrepresented communities. This is significant because workers with a bachelor's degree earn about \$20,000 more annually compared to their peers with only a high school diploma³ – resulting in a huge gap in life-time earnings. Workers who complete a union apprenticeship program, on the other hand, earn wages equivalent to workers with college degrees. Importantly, because union apprenticeship programs are free, and workers earn a wage while being trained on the job, a career in construction is accessible to all workers regardless of educational attainment, parental status, income and racial identity. Projects that rely on union apprentices and union labor create a path to the middle-class for thousands of working families. This is a critical but often neglected area of investigation in scoping processes.

Conclusion

The full range of a project's socioeconomic impacts are oftentimes not fully studied or understood during the scoping process. The Goldendale project will create thousands of high quality construction jobs over five years during a time when working families are experiencing record inflation and financial insecurity. Investigation of the full range of the socioeconomic benefits of this project will provide the public and stakeholders a complete picture of the project's net costs and benefits, and improve public confidence in the scoping process.

The Laborers appreciate the opportunity to comment, and will submit further comments in this proceeding.

Thank you for your attention to this matter.

Sincerely,



Zack Culver
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¹ The DEIS concluded: "With appropriate worker safety training and best practices in place, the potential temporary construction-related risks to physical safety would not result in a significant adverse impact," see DEIS, p. 173.

² For example, in order to reduce the spread of noxious weeds and invasive species, workers will receive training to increase their awareness and identification of noxious weeds and invasive plants, and procedures for reporting and confirming infestations, and prevention/control measures. See DEIS at p. 136.

³ <https://www.seattlepi.com/seattlenews/article/how-much-college-graduates-earn-in-seattle-16018134.php>

The below names have signed this letter in full and complete sincerity:

John O'Leary

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