



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 348

Dear Director Park:

In response to the “State Environmental Policy Act Draft Environmental Impact Statement” for the proposed Goldendale Energy Storage Project, Laborers’ Local 348 submits these comments for consideration.

The Laborers Local 348 represents 1200 construction workers including many who live and work within commuting distance of the Goldendale Energy Storage Project. Laborers Local 348 has an office in Richland, Washington 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.

An impact assessment that fails to mention the sweeping socioeconomic benefits of a project is inconsistent with state policy.¹ In addition, the Department has the option to combine the DEIS with other documents to include additional analyses to help identify issues of concern to citizens.² In order to ensure a robust review process, and boost public confidence in that process, the Department should study and consider socioeconomic impacts including employment impacts. The scale of the project, potential adverse impacts to Tribal resources, importance to clean energy development, and prospect to create thousands of middle-class construction careers demands a comprehensive study of the numerous social and economic effects of the Goldendale project.

With record inflation, and an increasing amount of Americans who are struggling financially, the socioeconomic impacts of major construction projects matter to average working families in Washington State. In fact, according to the most recent poll by the U.S. Census Bureau, a record 32.2% of Washington respondents report having difficulties paying their bills,³ up from 25.3% one year ago.⁴ Indeed, a recent survey conducted by the Seattle Times, KING 5, the University of Washington’s Center for an Informed Public, and Washington State University’s Murrow College of Communication found that one in five voters identified inflation as their most important concern, second only to reproductive rights.⁵ Another recent survey by the Washington State Hospital Association found that hospitals lost \$929 million in the first quarter of 2022, with all 52 rural hospitals and health systems reporting negative margins and accounting for nearly all the state losses.⁶

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

¹ In establishing the State Environmental Policy, the legislature recognized that the policy should “fulfill the social, economic, and other requirements of present and future generations of Washington citizens,” RCW 43.21C.020.

² WAC 197-11-448 (4).

³ <https://www.census.gov/data-tools/demo/hhp/#/?measures=EXPENSE&periodSelector=47>

⁴ <https://www.census.gov/data-tools/demo/hhp/#/?measures=EXPENSE&periodSelector=33>

⁵

<https://www.seattletimes.com/seattle-news/politics/these-are-the-issues-that-matter-most-to-washington-state-voters-new-poll-indicates/>

⁶

<https://www.king5.com/article/news/health/washington-hospitals-millions-financial-struggles/281-2becf70c-1099-4e2d-b1e4-a068d900f451>

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,

/sign



Francisco Elguezabal

Business Manager/Secretary Treasurer

Laborers' Local Union 348

2505 Duportail St.

Richland, WA, 99352

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

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

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