



**INTERNATIONAL
BROTHERHOOD
OF ELECTRICAL
WORKERS®**

900 Seventh Street, NW
Washington, DC 20001
202.833.7000
www.ibew.org

LONNIE R. STEPHENSON
International President

KENNETH W. COOPER
International
Secretary-Treasurer

July 5, 2022

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
12225 Wilkins Avenue
Rockville, MD 20852

**Re: IBEW Comments on Draft Environmental Impact Statement for
the Line 200 and Line 300 Project by Driftwood Pipeline, LLC,
FERC Docket No. CP21-465-000, et al.**

Dear Secretary Bose:

The International Brotherhood of Electrical Workers, AFL-CIO, CLC (“IBEW”) submits these comments in response to the Federal Energy Regulatory Commission’s (“Commission”) review of the Draft Environmental Impact Statement for the Line 200 and Line 300 Project by Driftwood Pipeline, LLC. The IBEW fully endorses the comments previously submitted on this docket by our local affiliates IBEW Local Union 861 and IBEW Local Union 995¹ and offers the following additional comments and information for the Commission to consider as part of its review.

The IBEW represents approximately 400,000 highly skilled and trained active members working in the construction industry throughout the United States and Canada. Our members work on all aspects of energy infrastructure, including the construction of natural gas pipelines.

The Driftwood Pipeline will help the U.S meet our long-term energy needs with low-cost, clean and reliable domestic natural gas resources. In addition, the project will provide thousands of good union construction jobs for the IBEW and other building trades unions and thus has the potential to create substantial and far-reaching socio-economic benefits. As noted in IBEW Local 861’s comments, Driftwood Pipeline has taken the unique and important step of committing to using union labor on the project, with at least 50% of the workforce coming from the local communities impacted by the project, including the members of IBEW Local 861 and IBEW Local 995.

¹ Comments of IBEW Local 861 and IBEW Local 995 were submitted on the subject docket(s) on June 13, 2022 and July 5, 2022, respectively. IBEW Local 861 and IBEW Local 995 are among several union labor intervenors in this matter.



**INTERNATIONAL
BROTHERHOOD
OF ELECTRICAL
WORKERS®**

Secretary Bose
July 5, 2022
Page 2

As part of the environmental review process, the Commission evaluates the socio-economic impact of constructing and operating a proposed project.² In making this evaluation, the IBEW urges the Commission to consider several key factors unique to the unionized construction industry that will bring significant positive socio-economic benefits to the region, particularly in the communities where the project will be located.

As noted above, the project will provide thousands of good, union construction jobs supported by family-sustaining wages, health insurance, retirement and other fringe benefits. Research has demonstrated that union construction workers positively impact public budgets, as they contribute more in income taxes, payroll taxes, and state income taxes than their non-union counterparts.³ These benefits will be particularly true for this project, given Driftwood Pipeline's commitment to hiring at least 50% from the local workforce in the communities where the project will be built.

Joint labor-management (union) apprenticeship programs, dubbed the "bachelor's degrees of the construction industry," deliver outcomes that rival universities and community colleges in terms of training hours, diversity, competitive earnings and benefits, and positive social and fiscal impacts.⁴ Not only do these programs strengthen the talent pool, but they also deliver middle-class lifestyles. While nonunion construction workers experience economic, social, and tax outcomes similar to high school graduates, union construction workers who complete joint labor-management apprenticeship programs earn pathways into the middle class.⁵

² FERC, *Guidance Manual for Environmental Report Preparation for Applications Filed Under the Natural Gas Act*, Vol. I at 4-80, <https://www.ferc.gov/sites/default/files/2020-04/guidance-manual-volume-1.pdf>.

³ Aaron Sojourner and Jose Pacas, *The Relationship Between Union Membership and Net Fiscal Impact*, University of Minnesota; Institute of Labor Economics (Jan. 2018), <https://docs.iza.org/dp11310.pdf> (finding that union construction workers contribute 68 percent more in federal income taxes, 49 percent more in payroll taxes, and 61 percent more in state income taxes than their nonunion counterparts). See also Evan Woods, *Washington Apprenticeship Growth and Expansion Study*, Washington State Labor Council (Jan. 2019), http://www.wslc.org/wp-content/uploads/2019/02/WAGES-apprenticeship-study-19Feb05_full.pdf (finding that union apprenticeship programs provide a greater return on investment for individual apprentices and taxpayers than comparable nonunion programs).

⁴ Frank Manzo and Erik Thompson, *Union Apprenticeships: The Bachelor's Degrees of the Construction Industry*, Illinois Economic Policy Institute (Sept. 2021), <https://illinoisepi.files.wordpress.com/2021/09/ilepi-union-apprentices-equal-college-degrees-final.pdf>.

⁵ *Id.*



**INTERNATIONAL
BROTHERHOOD
OF ELECTRICAL
WORKERS®**

Secretary Bose
July 5, 2022
Page 3

Through our joint labor-management apprenticeship programs, IBEW members are trained in all aspects of energy infrastructure work, including pipeline work, to the highest current safety and industry standards. All training programs emphasize meeting environmental standards and teach the skills needed to safely and efficiently perform this work, which is critical to avoiding and reducing the project's environmental impacts. Apprentices are certified on a wide range of tools, equipment, safety and environmental techniques that ensure that workers, public health and the environment are protected in ways that meet or exceed federal standards.

In addition, numerous studies of union apprenticeship programs across the country show that these programs can significantly improve diversity and equity in the workforce and improve socio-economic outcomes for women, people of color, and other economically disadvantaged and historically marginalized people.⁶ These programs have a strong track record of success and are specifically designed to recruit and train members of local communities and connect them with careers in the construction trades. One such study compared union and non-union construction apprenticeship programs in the Portland, Oregon area and found that union apprenticeship programs provide significantly better outcomes overall for women and people of color compared to non-union programs and that union programs have greater apprenticeship diversity in terms of both gender and race.⁷

The construction jobs created by the Project, like all construction jobs, will be inherently temporary in nature. However, because they will be good union jobs, the wider socio-economic benefits will continue long after the Project is completed. Furthermore, the skills gained in union apprenticeship programs ensure that, even

⁶ See, e.g., Frank Manzo and Robert Bruno, *The Apprenticeship Alternative: Enrollment, Completion Rates, and Earnings in Registered Apprenticeship Programs in Illinois*, Illinois Economic Policy Institute (Jan. 2020), <https://illinoisepi.files.wordpress.com/2020/01/ilepi-pmcr-the-apprenticeship-alternative-final.pdf> (finding that between 2000 and 2016, more than 74,000 construction apprentices [97 percent] were enrolled in joint labor-management programs, compared to less than 2,000 in employer-only programs, with joint programs enrolling 98 percent of all women, 99 percent of all African American apprentices, 98 percent of all Latino apprentices, and 97 percent of all military veterans); Building Trades of Minnesota, "Registered Apprenticeship in the Construction Trades," <https://mntrades.org/apprenticeship/> (Approximately 5 percent of the total construction workforce were people of color, compared to 20.5 percent of union construction apprentices; apprenticeship completion rates for minority apprentices increased 339 percent between 2012 to 2019); Lawrence Mishel, Economic Policy Institute, *Diversity in the New York City union and nonunion construction sectors* (Mar. 2017), <https://www.epi.org/publication/diversity-in-the-nyc-construction-union-and-nonunion-sectors/>.

⁷ Larissa Petrucci, PhD, *Constructing a Diverse Workforce: Examining Union and Non-Union Construction Apprenticeship Programs and their Outcomes for Women and Workers of Color*, University of Oregon, Labor Education and Research Center (2021), https://cpb-us-e1.wpmucdn.com/blogs.uoregon.edu/dist/a/13513/files/2021/11/Constructing_A_Diverse_Workforce.pdf.



**INTERNATIONAL
BROTHERHOOD
OF ELECTRICAL
WORKERS®**

Secretary Bose
July 5, 2022
Page 4

when the Project is finished, union construction workers will remain in high demand for decades to come. This will be particularly true in the electrical construction industry, as billions of dollars in both public and private infrastructure investments are now being made in energy and electrification-related projects.

The members of the IBEW are ready to get to work building the Driftwood Pipeline. We urge the Commission to act expeditiously to complete the review process and prepare a timely decision approving the draft environmental impact statement.

Sincerely yours,

Lonnie R. Stephenson
International President

LRS:nl