



Building Trades Council

Kern, Inyo, & Mono Counties of California AFL-CIO

January 17, 2012

Lisa Worrall
Planner II
California Energy Commission
Siting, Transmission and Environmental Protection Division
1516 Ninth Street, MS 40
Sacramento, CA 95814

DOCKET

11-AFC-2

DATE JAN 17 2012

RECD. JAN 23 2012

RE: Construction and Operation Workforce for the Proposed Hidden Hills Solar Electric Generating System (HHSEGS) Project (11-AFC-2)

Dear Ms. Worrall,

Thank you for your inquiry about the available workforce for the above mentioned project located in Inyo County, California. My responses to your questions are as follows:

1. Based on your experience and knowledge of the labor workforce in Inyo County, the project's construction and operation workforce needs, and the location and type of the proposed project, where would the construction and operation workforce be likely to come from?

If the project contractor enters into a Project Labor Agreement with the affiliates of this Building Trades Council, we expect that nearly all of the construction workforce would come from California, with a large proportion of those from Kern, Inyo and Mono Counties and most of the rest from neighboring California counties. Because of the union structure and their construction worker dispatch rules, a Project Labor Agreement automatically ensures that Californians from the local area get priority in hiring. This is exactly what we are seeing with construction of the BrightSource Ivanpah project which is being built under Project Labor Agreement and is also located in a remote area very near the Nevada border and close to a small Nevada town.

In contrast, if there is not a Project Labor Agreement and some or all of the project is constructed using non-union labor, it is likely that most of the workforce would not be from California. Large, non-union industrial construction projects typically import workers from lower wage states. Because these workers are low paid, usually not provided with health insurance, and far from home, they can put large demands on local housing, public services, police and local hospitals. They also tend to send most of their earnings back to their families in other states, rather than spending their money in the local area and in California.

We have no particular information on where the operations workforce would come from.

JOHN SPAULDING
EXECUTIVE SECRETARY

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2. The applicant has estimated five percent of the workforce (both construction and operations) would come from Inyo County. Is this an accurate assumption? Would construction workers come from other counties in California?

Given the low population in Inyo County, the applicant's five percent estimate may be accurate. However, the estimates of workers from Nye County and Clark County, Nevada are not correct, assuming there is a Project Labor Agreement for the project. As we stated above, if there is a Project Labor Agreement, nearly all of the construction workforce will automatically come from California because of the dispatch rules of the California unions.

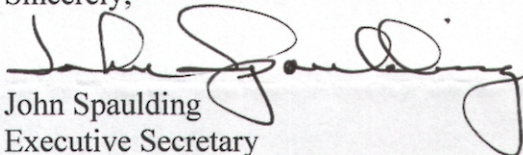
3. Considering there is little to no lodging near the project site in Inyo County, do you anticipate workers would commute from their residence on a daily basis or seek lodging closer to the project?

Again, using the Ivanpah project as a model, if there is a Project Labor Agreement, it is likely that the work would be scheduled on a 4 day per week, 10 hours per day basis. This results in many construction workers commuting to the site Monday morning, seeking nearby lodging for three nights, then returning home Thursday afternoon.

If there is not a Project Labor Agreement, resulting in a low wage workforce from out of state, construction workers will not be able to return home on weekends and will be forced to find long term housing for the duration of their work on the project. This would likely be in the nearby Nevada town. Again, this puts much heavier demand on local services while retaining less of the economic benefit for California.

I hope that my responses will be useful to you in evaluating the potential effects of the proposed HHSEGS project on population, housing and public services.

Sincerely,



John Spaulding
Executive Secretary