

May 6, 2015

U.S. Department of Transportation  
1200 New Jersey Ave. SE., W12-140  
Washington, DC 20590-0001

Docket Number: DOT-OST-2015-0013  
RIN 2105-AE38

Dear Sir or Madam:

The undersigned organizations, members and supporters of the Bay Area Quality Jobs Network are pleased to submit the following comments in support of the U.S. Department of Transportation's proposed rulemaking on Geographic-Based Hiring Preferences in Administering Federal Awards.

Investments in transportation projects have the potential to uplift communities by creating good jobs for low-income workers and people of color in the communities where projects are located. Research has shown that every billion dollars invested in public transportation creates more than 50,000 jobs over a 20-year period.<sup>1</sup> Unfortunately, U.S. DOT's prohibition on local hiring has limited advocates and city officials' ability to ensure local residents have access to jobs on federally funded transportation projects in their own communities. By allowing cities, regional planning organizations and states to establish reasonable local hire requirements in consultation with building and construction trades unions, the proposed DOT rule creates an important opportunity to expand local hiring and ensure that transportation investments create job opportunities for the communities that need them the most.

As a coalition of labor, policy advocacy and community based organizations, we have been working with our regional transportation agency, the Metropolitan Transportation Commission to develop a Regional Prosperity Plan that weaves together access to affordable and efficient public transportation, expanding and preserving affordable housing close to jobs the expansion of and access to middle wage job opportunities for local residents. Our Regional Prosperity Plan specifically notes that local hire provisions focused on the nine Bay Area Counties and requirements that projects use state certified apprentices is a best practice for linking local workers to good construction jobs.

As part of our work to implement this Regional Prosperity Plan, the consortium piloted a two county multi-craft pre-apprenticeship program (the Construction Careers Initiative) in San Mateo and Santa Clara Counties. This pre-apprenticeship

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<sup>1</sup> American Public Transportation Association. Economic Impact of Public Transportation Investment. 2014. Accessed March 25, 2015: <http://www.apta.com/resources/reportsandpublications/Documents/Economic-Impact-Public-Transportation-Investment-APTA.pdf>

program ensures that there will be qualified local workers ready to enter apprenticeship programs and meet the demand created by transportation investments with local hire requirements. The program has already placed local workers in state certified apprenticeships and construction jobs with pathways into apprenticeships.

Our experience with local hire requirements in the context of project labor agreements has been positive. The City of San Francisco has a strong local hire ordinance that has been implemented across all public works jobs. Overall, the City reports that mandates at the 20%, 25% and 30% local hire levels have all been consistently exceeded. The result of these requirements has been more than 929,000 hours of work for local residents.<sup>2</sup>

The City's 2013-2014 report on local hiring<sup>3</sup> demonstrates that under Project Labor Agreements at San Francisco International Airport, local workers did 38% of the work (exceeding all of the mandatory requirements), amounting to a total of 235,561 hours. 61% of the apprentices working at the airport were hired from San Mateo and San Francisco Counties, ensuring that workers are not only getting good jobs, but are also building skills for lifelong careers.

We encourage the US DOT to lift its prohibition on local hiring so that workers' representatives can work with our local jurisdictions, the Metropolitan Transportation Commission and our local transportation authorities to expand local hiring and put disadvantaged workers on career pathways to good middle wage jobs in construction through the state certified apprenticeship programs.

Sincerely,

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<sup>2</sup> <http://www.oewd.org/modules/showdocument.aspx?documentid=92>

<sup>3</sup> Ibid.

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