

**DOCKETED**

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*Comment Received From: Casey Gallagher/ California Labor Federation  
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**CA Labor Federation WED Program Comments on 2020-2023 Plan  
(July 2020)**

*Additional submitted attachment is included below.*

## **Comments on the June 2020 Draft of the 2020-2023 Investment Plan for the Clean Transportation Program**

The California Labor Federation commends the California Energy Commission and the work their staff put into creating this comprehensive investment plan. In addition, we laud the CEC for acknowledging the struggles many Californians are facing in the midst of the COVID-19 Pandemic and the urgent need for a recovery plan to address the economic hardships suffered by workers and industry.

The following comments, responses and questions will highlight ways the CEC in partnership with stakeholders from across the State, including Labor, can enhance the CEC's commitment to Inclusion, Diversity, Equity and Access and address the COVID-19 Pandemic through a strategic, cohesive, and coordinated Workforce Training and Development effort.

***Question 1: Has the latest version of the draft plan adequately addressed the impacts of COVID-19? If not what additional changes to the investment plan should the California Energy Commission consider?***

The COVID-19 Pandemic highlighted California's lack of a "shared prosperity". While the pandemic has impacted all Californians, job loss, lack of adequate healthcare and economic insecurity have hit socioeconomically disadvantaged communities the hardest. In particular, the pandemic has intensified the stresses pre-existing inequities born by Communities of Color. The Plan could further contextualize the CEC's mission to promote equity, inclusion, and access.

Given the scale of the required response to the pandemic, the Plan should address the CEC's efforts to align with other state agencies, such as the Labor and Workforce Development Agency.

***Question 2: Where are the California's biggest opportunities to use Clean Transportation Program funds to create jobs quickly and help stimulate the California Economy and support California Business on our path to economic recovery?***

- Align with other State Agencies on what they are doing to address economic recovery. The Employment Training Panel's COVID-19 Pilot Program and the California Workforce Development Board's High Road Training Partnerships are great examples of a how a state agency is responding to the Pandemic and supporting essential industries with training dollars to prepare and assist workers as they enter new careers or return to work after the long shutdown.
- Job Quality is an important part of Equity. The CEC should prioritize and engage high road employers and their Labor partners that fall into the priority sectors of this plan. Focusing on the needs of Industry Stakeholders (Organized Labor and Employers) and areas/occupations where they foresee the greatest demand will not only assist in stimulating the California economy by providing workers with family sustaining wages, but will also ensure that workers have protections, able to voice their concerns over

potential hazards and are trained to work safely in this historical moment.

- The California Labor Federation would like to know more about CEC's plans in defining and allocating the **Recovery and Reinvestment funds**. The Federation and its leadership are happy to discuss and partner with the CEC to explore opportunities to maximize impact, amplify the Commission's return on investment, and ensure high road opportunities for all Californians.

***Question 3: Have the changes made in the latest draft of the investment plan adequately prioritized high quality job opportunities? If no, what additional changes to the investment plan should the CEC consider?***

The following recommendations and responses are several ways the latest draft can further identify and lift-up high-quality job opportunities. Some of these include the great work that CEC has already done that we would like to see highlighted and expanded on.

- **Implementation of High Road Procurement Practices:** To ensure that the funds allocated by the Clean Transportation Program lead to high-quality job opportunities and reach the established long-term goals of the Plan, institutionalizing High Road Procurement Policies and Practices for all allocations would be critical development. Establishing procurement criteria that rewards High Road employers that ensure workers earn family sustaining wages, have job and economic security, their rights are respected and supported (i.e. Health and Safety, Right to Organize and Collectively Bargain), have access to advance in the workplace through training and there are equitable opportunities and accessible pathways into to these high-quality job opportunities for members of the community.

The defining and issuing of high road procurement criteria is something that has already been done by the California Energy Commission and the Federation would like to see this practice expanded on and institutionalized for the allocation of future funds. A prime example is the practice used in the SB100 funds connected to the procurement of Electric School Buses and aimed to reward Bus Manufacturers that guaranteed high standards in their workplaces.

- **Expanding on High Road Work of the CEC and its Partnerships:** In the current draft of the plan on pages 62-63, there is project that is highlighted that needs further clarification and correction to truly lift-up the high road training partnership work that is occurring in the field that brings together the State (i.e. CEC, ETP, CWDB), Employers, Organized Labor, Educational Institutions and other stakeholders to address the needs of Industry. We suggest the following edits:

*The California Community Colleges Chancellor's Office, in partnership with Mission College (Santa Clara), developed the Transit Apprenticeships for Professional Career Advancement*

*(TAPCA) program. The initial TAPCA program was funded by the California Apprenticeship Initiative (CAI). TAPCA was institutionalized by the California Division of Apprenticeship Standards (DAS) for the Santa Clara Valley Transportation Authority (VTA) and the Amalgamated Transit Union Local 265 through their Joint Workforce Investment (JWI) partnership, with Mission College as the lead educational agency. The project established the DAS registered apprenticeships for public coach operators, service mechanics, light rail track workers, and light rail overhead line workers, as well as transportation leadership academy. TAPCA supported an initial enrollment of more than 200 apprentices, established the Mission College Department of Transportation Studies, and created 46 transit career pathway courses and five Certificates of Achievement. CEC funds, via the California Community Colleges Chancellor's Office and Mission College, supported peer mentors for the TAPCA coach operator and service mechanic apprenticeships. TAPCA was a founding member of California Transit Works! (CTW), a high roads training partnership (H RTP) funded by the CWDB. CTW is a regional consortium of transit H RTPs including Golden Gate Transit/ATU Local 1575, AC Transit/ATU Local 192, Santa Clara VTA/ATU Local 265, Sacramento RTD/ATU Local 256, and San Joaquin RTD/ATU Local 256. Transit H RTPs are transferable models available to regional WDBs. CTW is designed to help local transit agencies and their unions address new workforce training needs associated with the projected growth in zero-emission bus procurement and accompanying demand for transit workers that can service and operate these electric bus fleets throughout the state. CEC funds also funds ZEB upgrade training for incumbent transit workers at AC Transit, VTA, and LA Metro through Employment Training Panel (ETP) grants to the California Labor Federation's Workforce and Economic Development program.*

- **Apprenticeship:** The California Labor Federation appreciates the acknowledgment of high-quality Joint Labor Management Apprenticeship Programs operating in the sectors reflected in this Plan. We would like to add that there many more State Registered Apprenticeship Programs that are jointly operated by Labor Unions and their signatory Employers that have established Industry Standards in almost all of the sectors and industries reflected in this plan. The Labor Federation would like to see these opportunities highlighted as well and is more than happy to assist the CEC in identifying these high road labor-management training programs that exist across the state.
- **Community College Curriculum and Educational Programs are helpful, but only part of the equation:** While educational opportunities are critical in this era of constant technological transformation, there is no assurance that course completion will lead to career advancement or employment. This is not to discredit the power of education, but it is only one part of workforce development.

On the other hand, Registered Apprenticeship Programs start with a job, combining educational curriculum (theory) and on-the-job training (practice) that is structured around current and future industry demand resulting in a state and industry-recognized lifelong skillset and a family sustaining career for the participant.

## General Recommendations and Summarized Comments:

- 1) Expand the Plan's definition and contextualization of Equity, Access, Inclusion and Diversity to the Workforce Training and Development section. If these types of developments are taking place for the benefit of disadvantaged communities, in turn members of these communities should have opportunities to participate in job training programs that lead to family sustaining careers. In particular, Job Quality must be a part of the definition of Equity.
- 2) Provide further explanation on how the CEC plans to allocate the Recovery and Reinvestment funds.
- 3) Invest in Preexisting Registered Apprenticeship Programs and other high road training programs established by Joint Labor Management Partnerships that address carbon reduction, environmental sustainability and are deliberate in closing the opportunity gap.
  - a. These types of investments engage the critical role that organized labor has and continues to play in these industries while lifting up Worker Voice.
- 4) Support and Encourage High Road Procurement Policies. Like what was introduced in the School Bus Replacement Program that ensures Job Quality and rewarding High Road Employers.
- 5) Align with other State Agencies in their Workforce Development Efforts.

For example, please review the California Workforce Development Board's programs

  - a. High Road Construction Careers funded by Senate Bill 1 (Gas Tax) to support local and regional developments in infrastructure construction and buttressing pre-apprenticeship pathways into in-demand careers
  - b. High Road Training Partnerships funded by Greenhouse Gas Reduction Funds to support partnerships in the non-construction trades to build pathways into industries and centers on Equity, Climate Resilience and Job Quality.
- 6) Prioritize High Road Workforce Training and Development that addresses the following elements:
  - a. **Worker Centered:** Workforce Development that does not put workers at the center runs the risk of being ineffective, lacking substance and in worst case scenarios socially reproducing inequities
  - b. **Industry Led:** Workforce Development should always be based the current and future needs of Industry
  - c. **Community Focused:** Providing Pathways, Equity and Access to Local Community members into family sustaining careers
  - d. **Metric Based:** Workforce development efforts need to be accountable to funders, but also to the industries and communities they serve.

Thank you for the opportunity to comment on this important plan. As a stated in the above comments, recommendations and questions, the California Labor Federation is more than interested in exploring potential partnerships, providing advice on best practices happening in the field and assisting in lifting-up the good work being done by the CEC and its staff. If you have any questions, would like more information, or have a further discussion, feel free to contact me.

**CASEY GALLAGHER  
PROJECT COORDINATOR  
WORKFORCE & ECONOMIC DEVELOPMENT  
CALIFORNIA LABOR FEDERATION**

**[CGALLAGHER@CALABORFED.ORG](mailto:CGALLAGHER@CALABORFED.ORG)**

**510.333.6516**

