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Comment Received From: Construction Trades Workforce Initiative (CTWI)
Submitted On: 6/28/2023
Docket Number: 22-DECARB-03

Re Docket No 22-DECARB-03; Comments of Construction Trades Workforce Initiative on the California Energy Commission Equitable

Additional submitted attachment is included below.



June 28, 2023

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 22-DECARB-03
1516 Ninth Street
Sacramento, CA 95814-5512

Via Electronic Commenting System

Re: Docket No. 22-DECARB-03; Comments of Construction Trades Workforce Initiative on the California Energy Commission Equitable Building Decarbonization Program Direct Install Draft Guidelines Request for Input

Alameda, Contra Costa and Napa-Solano Building & Construction Trades Councils (BTC) and Construction Trades Workforce Initiative (CTWI) respectfully submits our comments in response to the California Energy Commission Equitable Building Decarbonization Program Direct Install Draft Guidelines Request for Input.

CTWI is the nonprofit partner of the East Bay Building Trades, working to ensure the long term sustainability of the construction industry by bridging the gap between union construction labor and key stakeholders. The three BTC's together represent a coalition of over 30 affiliated unions representing workers in various construction trades throughout the East Bay. Together, CTWI and the three BTC's act as the collective voice of construction trade labor.

We support equitable efforts toward decarbonization and climate sustainability, and we believe the California Energy Commission (CEC) initiative to develop and implement an Equitable Building Decarbonization Program is a great opportunity to advance these shared goals. We appreciate this second opportunity to submit comments for consideration. Previous climate investments in the U.S. have often failed to create jobs that offer livable and dignified wages, employer-provided benefits, and opportunities for advancement. Given the challenging nature of the residential construction sector, this is likely to happen again without strategic policy intervention and coordination.

It is important that equity be considered for all stakeholders involved in the program. We believe that decarbonization work and climate sustainability can be achieved in a manner that allows for everyone to be better off and collectively prosper. There is a clear emphasis in the program on equity for low-to-moderate-income residents and ensuring that the program is accessible to these residents. We continue to urge that there must also be a clear emphasis on equity for the low-to-moderate-income workers who will be

performing the work and labor involved in the program. The jobs created and utilized by the program should be quality, high road jobs available to local and disadvantaged residents.

As we noted in our previous comments, one way to ensure that the jobs created and utilized in the Equitable Building Decarbonization Program is through the adoption of Labor Standards. We appreciate the inclusion of prevailing wage language, however, this means the inclusion of holistic job quality standards in addition to strengthening the aforementioned prevailing wage requirements. Work conducted under the program ideally should meet the following **Labor Standards**:

- Require prevailing wages at every contracting tier
- Healthcare Portable and available to dependents and should meet Covered California's Silver Level
- Portable retirement benefits
- Participating in a State approved apprenticeship program that trains a skilled workforce
- Attainment of industry appropriate certifications
- Regional targeted hire requirements to ensure the participation of disadvantaged workers and/or graduates from approved MC3 pre-apprenticeship programs
- A history of abidance with building code and labor laws
- Adopting a Multi-Craft Community Workforce Agreement or Project Labor Agreement negotiated with the Building Trades

The collective set of Labor Standards outlined above will ensure that the Equitable Building Decarbonization Program creates and utilizes quality, high road jobs. We continue to encourage CEC to adopt and implement these Labor Standards into the program design, and CTWI and the aforementioned Building Trade Councils stand ready to assist by providing technical assistance in the implementation of them.

CTWI is also a co-leader of the Bay Area High Road Training Partnerships (HRTP) alongside the Rising Sun Center for Opportunity. HRTP is a California initiative designed to model partnership strategies that transform industries across the state from low road to high road - generating family sustaining jobs where workers have agency and voice, all while supporting broader climate sustainability efforts. In addition to the comments we are submitting here in this letter, we would like to also acknowledge and lift up the comments being submitted by the collective HRTP partnership under Rising Sun's stewardship to which we have signed on in support. It is critical we approach our climate sustainability and decarbonization initiatives in a model of cooperation and partnership and we support the collective advocacy for enhanced labor standards as recommended by the HRTP.

We appreciate the CEC for its commitment to this topic, for the inclusion of workforce standards in the RFI, and for the opportunity to continue to offer comments and engage in this process. We welcome future conversations, as useful and appropriate, to explore the topic of workforce standards more in-depth.

Respectfully,

Beli Acharya, Executive Director Construction Trades Workforce Initiative



Andreas Cluver, Secretary-Treasurer Alameda Building & Construction Trades Council



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