

RESOLUTION NO. 3736

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2
3 **A Resolution** of the Port of Seattle Commission establishing a Priority Hire
4 Policy Directive; and amending the Policy Directive related to
5 practices for construction labor for projects located on Port
6 property adopted by Resolution No. 3725.
7

8
9 **WHEREAS**, the construction industry is forecasted to experience consistent growth in
10 the King County region over the next decade; and
11

12 **WHEREAS**, numerous studies show a widening gap between the demand for
13 construction labor and the supply of skilled trade workers in the regional labor market
14 for King County public agencies. The Regional Public Owners Group estimate there will be
15 over sixty-seven billion dollars in public construction projects by 2042 with over seventy
16 million labor hours needed to fulfill this demand for projects. It is projected that between
17 2018 and 2023 there will be a shortage of over 4100 skilled workers. Regional labor
18 supply is forecasted to underserve demand by an average of 9 to 10 percent during
19 2018-2042; and
20

21 **WHEREAS**, the Port of Seattle makes among the largest investments in infrastructure
22 projects in the region. In 2017, the Port of Seattle is projected to spend approximately
23 \$180 million on construction projects and estimates continual growth in future years.
24 The Port's capital investment dollars create the equivalent work hours of 10.89 jobs per
25 one million dollars spent, providing enough total hours to equal approximately 950 full
26 time jobs in Washington State in 2016; and
27

28 **WHEREAS**, most recent data for 2016 indicates that over 80 percent of the construction
29 workforce in King County are Caucasian males, while 19 percent are women and people
30 of color. Representation of women and people of color is higher among new entrants to
31 the labor force through apprenticeships and accredited certificates of completion, such as
32 those received for completing a pre-apprenticeship program. However, according to the
33 analysis, women and people of color also have lower rates of apprenticeship completion
34 than do their Caucasian male counterparts; and
35

36 **WHEREAS**, the Port of Seattle is committed to ensuring equity in the construction projects
37 workforce where disparities exist between underrepresented workers' availability to work
38 and their opportunity to be hired and establish a career in the construction trades; and
39

40 **WHEREAS**, the Port of Seattle is committed to its values of conducting business with the
41 highest ethical standards. Our business practices shall reflect integrity, accountability,
42 honesty, fairness and respect at all levels; and
43

44 **WHEREAS**, the Port of Seattle is a leader in workforce development and has found
45 construction job training programs, including Career Connected Learning,
46 apprenticeship and pre-apprenticeship programs, to be an effective way to prepare
47 individuals for entry into construction jobs, and to ensure women, people of color, and
48 otherwise disadvantaged individuals, can acquire the necessary job skills and be
49 prepared to successfully pursue construction careers; and
50

51 **WHEREAS**, the Port of Seattle was the first to adopt apprenticeship utilization goals over
52 three decades ago and is committed to achieving its apprenticeship hiring goals set in
53 Port policy and addressing the disproportionately low involvement by people of color
54 and women in the construction labor force. Apprentice utilization goals for Port
55 construction projects is 15 percent, of which includes a goal of 10 percent women and
56 15 percent people of color. In 2016, apprenticeship utilization rates were 17 percent, of
57 which 18 percent were women and 28 percent were people of color; and
58

59 **WHEREAS**, on October 25, 2016, the Port of Seattle adopted Resolution No. 3725 that
60 established the Port of Seattle Construction Labor Policy Directive that states that the
61 Port shall establish appropriate apprentice and locality hiring goals and appropriate
62 aspirational women and minority apprentice hiring goals; and
63

64 **WHEREAS**, the Port of Seattle supports the City of Seattle and King County findings that
65 King County has geographic areas of economic distress as evidenced by poverty
66 indicators; including poverty levels, concentrated unemployment, and gaps in educational
67 attainment. The Port of Seattle seeks to act effectively and expeditiously to encourage
68 solutions toward economic growth and job creation in areas of the County that are
69 economically distressed as evidenced by comparatively high levels of poverty,
70 unemployment rates and education attainment; and
71

72 **WHEREAS**, Priority Hire enhances community partnerships focused on inclusion and
73 access to opportunities and services; expands opportunities for disadvantaged
74 populations to advance equity and social justice; and ensures that Port construction
75 projects are planned and implemented in a way that improves equity in local
76 communities; and
77
78

79 **WHEREAS**, the Port believes that establishing a Priority Hire policy ensures better access
80 to training programs and well-paying construction jobs for local workers, particularly
81 those from Economically Distressed Areas, as well as increases the diversity of the
82 workforce on Port construction and Port-related projects; and

83
84 **WHEREAS**, in 2017, the Port of Seattle convened community stakeholder meetings and
85 received input from contractors, labor union representatives, community advocates,
86 small contracting and supplier businesses, training providers, City of Seattle and King
87 County policy experts about the challenges and opportunities of a Priority Hire program.
88 The Port of Seattle intends to use the information received from these meetings as a
89 guide for implementing the Priority Hire program and developing a regional agreement
90 for use on public works projects; and

91
92 **WHEREAS**, Priority Hire focuses on workforce participation by apprentice and journey-
93 level construction workers and is therefore directly connected to the Port’s existing
94 apprenticeship program; and

95
96 **WHEREAS**, the Port is committed to fostering an acceptable worksite on public works
97 projects that is inclusive and focuses on anti-discrimination and anti-harassment
98 behaviors and procedures and encourages positive relationships between employers
99 and employees, and among employees; and

100
101 **WHEREAS**, over the last two years, the Port of Seattle has participated as member of
102 the Regional Public Owners Group with the City of Seattle, King County, Sound Transit,
103 the City of Tacoma and the Washington State Department of Transportation, focused on
104 public agencies working together as regional partners; and

105
106 **WHEREAS**, the purpose of the Regional Public Owners Group is to better understand
107 and narrow the workforce demand-supply gap for regional public infrastructure
108 projects; enhance access opportunities and increase the diversity of pre-apprentices,
109 apprentices and journey-level workers entering into the trades workforce; support
110 retention programs for current trades workers, especially women and people of color;
111 and improve performance data and systems of reporting for monitoring regional goals
112 and initiatives; and

113
114

115 **NOW, THEREFORE, BE IT RESOLVED** by the Port Commission of the Port of Seattle as
116 follows:

117
118 SECTION 1. Resolution No. 3725 is hereby amended as follows:

119
120 A. In Section 1.D., strike “and locality” and in Section 1 insert the following: E. For
121 contracts under a PLA with projected construction labor costs at or above \$5 million, the Port
122 shall establish Priority Hire goals.

123
124 B. In Section II.C.2., strike “locality hiring and” and in Section II insert the following: D. For
125 contracts under a PLA with projected construction labor costs at or above \$5 million, the Port
126 shall establish Priority Hire goals.

127
128 C. In Section III.B.2., strike “locality hiring and” and in Section III.B. insert the following: 3.
129 For contracts under a PLA with projected construction labor costs at or above \$5 million, the
130 Port shall establish Priority Hire goals.

131
132 SECTION 2. A Priority Hire Policy Directive is hereby established as shown in Exhibit A, attached.

133
134 SECTION 3. The Policy Directive contained in Exhibit A and attached to this resolution shall be
135 labeled and catalogued as appropriate, together with other Commission Policy Directives, and
136 shall be made readily available for use by Port staff and members of the public as a governance
137 document of the Port of Seattle.

138
139
140 **ADOPTED** by the Port Commission of the Port of Seattle at a duly noticed meeting thereof, held
141 this ____ day of _____, 2017, and duly authenticated in open session by the signatures of
142 the Commissioners voting in favor thereof and the seal of the Commission.

143
144
145 _____ Tom Albro
146 _____ Stephanie Bowman
147 _____ John Creighton
148 _____ Fred Felleman
149 _____ Courtney Gregoire

150 Port Commission

151 **EXHIBIT A**

152 **SECTION 1.** Purpose.

153
154 The purpose of this Policy Directive is to provide good family wage jobs to qualified construction
155 workers from Economically Distressed Areas of King County by increasing access to Port of Seattle
156 Projects. This leads to economic growth and job creation in areas of King County that are
157 experiencing economic distress. In addition, it will provide jobs to those historically
158 underrepresented in the construction industry, such as women and people of color.

159
160 To develop a Priority Hire program that will be generally implemented through a Project Labor
161 Agreement (PLA) and other Port efforts, and to foster closer cooperation with the Regional Public
162 Owners Group to ensure uniform application of Priority Hire terms and Contractor and Union
163 compliance with Priority Hire requirements. This supports the Port of Seattle’s continued efforts
164 on workforce development.

165
166 **SECTION 2.** Definitions.

167
168 When used in this Policy Directive, the following words and phrases shall have the meanings
169 given below unless the context in which they are included clearly indicates otherwise:

170
171 “Apprentice” means a person who has signed a written apprenticeship agreement with and
172 enrolled in an active state-registered apprenticeship training program approved by the
173 Washington State Apprenticeship and Training Council.

174
175 “City” means City of Seattle.

176
177 “Construction labor costs” means the labor cost component of the estimated construction budget
178 for the project to be paid to contractors at the time of bid or, if absent a bid, at the time of the
179 contract award.

180
181 “Contractor” means any person, firm, partnership, owner operator, limited liability company,
182 corporation, joint venture, proprietorship, trust, association or other legal entity that employs
183 individuals to perform work on projects, including general contractors, subcontractors of all tiers,
184 and both union and non-union entities.

185
186 “Core Employee” means an employee of an open-shop contractor that meets the core employee
187 criteria established under a PLA.

188
189 “Project” means a Port of Seattle construction project, whether under a PLA or not.

190

191 “Dispatch” means the process by which a union refers workers for employment to contractors
192 under the authority of a collective bargaining agreement. The process typically mandates the
193 distribution of work via a “first in, first out” priority but can be legally adjusted via special
194 agreements to allow for out of order dispatching and Priority Worker hiring.

195
196 “Economically Distressed Area” means a geographic area defined by zip code in King County and
197 found to have high population concentrations: 1) Living at or below 200 percent of the federal
198 poverty level, 2) Unemployed, 3) Those over 25 years of age without a college degree, compared
199 to other zip codes. King County zip codes with a high density per acre of at least two out of the
200 three criteria will be identified as Economically Distressed Areas. These zip codes are updated and
201 published by King County’s Finance and Business Operations Division.

202
203 “Jobs Coordinator” means either one of the following: a Port of Seattle employee, an employee
204 that is considered a shared resource between government agencies, or a third party entity that
205 facilitates the hiring of Priority Workers in collaboration with Contractors and Union Dispatch.

206
207 “Journey-level” means an individual who has sufficient skills and knowledge of an occupation,
208 either through a formal apprentice training program or through practical on-the-job work
209 experience, to be recognized by a state or federal registration agency and/or an industry as being
210 qualified to perform the work of the occupation. Practical experience must be equal to or greater
211 than the term of apprenticeship.

212
213 “Labor hours” means hours performed on projects by workers who are subject to prevailing
214 wages.

215
216 “Open-shop contractor” means a contractor that is not a signatory to a collective bargaining
217 agreement with a union representing the trade(s) of the contractor’s workers, also known as non-
218 union contractors.

219
220 “Pre-apprentice” means a student enrolled in a construction pre-apprentice training program
221 recognized by the Washington State Apprenticeship and Training Council.

222
223 “Priority Hire Program” means a program on Port of Seattle major construction contracts that
224 focuses on recruitment, training and employment of workers who reside in Economically
225 Distressed Areas as defined by King County.

226
227 “Priority Worker(s)” means an individual prioritized for recruitment, training, and employment
228 opportunities because the individual is a resident in an Economically Distressed Area.

229

230 “Project Labor Agreement” means an agreement authorized under the National Labor Relations
231 Act (NRLA), 29 U.S.C., which provides a means for aligning interests of public owners such as the
232 Port with those of construction labor unions.

233
234 “Regional Public Owners Group” means the group including the City of Seattle, King County, Port
235 of Seattle, Sound Transit, the City of Tacoma and the Washington State Department of
236 Transportation, focused on public agencies working together as regional partners to better
237 understand the workforce demand-supply gap for regional public infrastructure projects; to
238 enhance access opportunities and to increase the diversity of pre-apprentices, apprentices and
239 journey-level workers entering into the trades workforce; to support retention programs for
240 current trades workers, especially women and people of color; and to improve performance data
241 and systems of reporting for monitoring regional goals and initiatives.

242
243 “Union” means a representative labor organization whose members collectively bargain with
244 employers to set the wages and working conditions in their respective trade or covered scope of
245 work.

246
247 SECTION 3. Scope and Applicability.

248
249 A. This Policy Directive pertains to Project(s) for the remainder of this Policy Directive.

250
251 B. In keeping with this Resolution, the Port shall develop and incorporate Priority Hire
252 requirements in all future leases, concession agreements, and procurement contracts.

253
254 SECTION 4. Responsibilities.

255
256 A. The Executive Director (1) will assign a designee (referred to as “Designee” for the
257 remainder of the Policy Directive) and subsequent designated office to implement and administer
258 this Policy Directive, and (2) may, through the Designee, develop and adopt rules consistent with
259 the requirements of this Policy Directive.

260
261 B. The Designee, with the Executive Director’s written concurrence and upon notice to the
262 Commission, may reduce or waive requirements or goals of this Policy Directive when impractical
263 for a Project, lease, concession, or other procurement for one or more of the following reasons:
264 when required due to an emergency, when subject to limitations of a sole source, when
265 requirements or goals would be inconsistent with an agreement with a public agency, when
266 requirements or goals are inconsistent with federal funding or other funding sources, when
267 options are greatly limited due to a remote location, when superseded by safety or other legal
268 requirements, or when other conditions arise such as the goals become impractical.

269

270 C. The Designee shall be responsible for identifying, monitoring, and mitigating risks
271 within his/her authority; and propose mitigation actions to the Executive Director if additional
272 authority is required. The Designee shall enforce the requirements in this Policy Directive and
273 may use actions as deemed appropriate.

274
275 D. As part of establishing a Priority Hire advisory committee to operate in an advisory
276 role to the Port of Seattle for implementation and effectiveness of this Policy Directive, the
277 Designee shall participate in the previously established Regional Public Owners Group and may,
278 under an agreement with one or more other government entities with Priority Hire programs,
279 establish and participate in a regional Priority Hire advisory committee.

280
281 SECTION 5. Policy.

282
283 A. For Projects, leases, concessions, and procurements that are not found impractical
284 under Section 2.4 B, the Designee shall establish in the bid or other solicitation documents the:
285 (1) required percentage of labor hours to be performed by Priority Workers, and (2) aspirational
286 goal percentage of labor hours to be performed by Priority Workers. Contractors and Dispatch
287 under a PLA shall seek to first hire and dispatch Priority Workers so as to meet or exceed the
288 required and aspirational goal percentages. Participants in Projects not covered by a PLA shall
289 similarly endeavor to achieve Port Priority Hire objectives.

290
291 The Designee shall establish the percentages separately for apprentices and for journey-level
292 workers.

293
294 B. For each Project, the Designee shall establish the greatest practicable required
295 percentage of labor hours to be performed by Priority Workers by considering anticipated
296 workforce availability and past utilization percentages on similar construction projects from the
297 most recent project previous calendar year, and shall establish the percentage for the upcoming
298 year.. This shall be included in the PLA and other Port agreements as appropriate and progress
299 monitored by the Designee. The Designee shall adjust these required percentages annually, based
300 on performance and reasonably anticipated changes in worker availability.

301
302 C. In order to achieve the intended impact in Economically Distressed Areas, the Designee
303 shall set project-specific requirements and an aspirational goal percentage of no less than 20
304 percent for all labor hours performed annually by Priority Workers on the total of Projects for the
305 year. Annual percentage rates will be measured January 1 – December 31 of each applicable year.

306
307 D. In order to meet the percentage of labor hours to be performed by Priority Workers,
308 the Designee shall require contracted parties to seek to employ a Priority Worker who is a
309 resident of an Economically Distressed Area in King County, and then workers from any other

310 Economically Distressed Areas as needed to meet the percentage labor hours to be performed by
311 Priority Workers. The specific process by which the parties and the Port of Seattle Job
312 Coordinator(s) will collaborate in order to facilitate the hiring of Priority Workers shall be
313 established by the Designee.

314
315 As part of the PLA and other contractual standard language, the Port shall endeavor to lower
316 barriers to entry that may exist for recruits from Priority Hire zip codes that disqualify them for
317 apprenticeship, Union membership, and/or employment such as issues related to transportation
318 that include driver's license, access to a vehicle, and geographic proximity to jobsites.

319
320 E. The Designee shall ensure the availability of a Jobs Coordinator(s) to perform the
321 following functions: maintain a database of pre-qualified Priority Workers for referral to work on
322 Projects; network with various work source centers, community, non-profit and faith-based
323 organizations to facilitate the identification of Priority Workers; and facilitate referral and
324 coordination around training and employment of Priority Workers between Contractors, Unions,
325 lessee's, concessionaires, suppliers, and training programs. In addition, the Designee shall explore
326 development of a third party to manage regional Priority Hire efforts.

327
328 F. Per Resolution 3725, as amended, contracts \$1 million in value or greater requires
329 apprenticeship utilization goals. The goal is no less than 15 percent of all contract labor hours
330 are to be performed by apprentices.

331
332 (1) For individual projects, the Designee will determine the apprenticeship utilization
333 goal and may consider such factors as project size, project duration, labor hours
334 anticipated for the project, skills required, the likely crafts required for the project,
335 historic utilization rates and apprentice availability.

336
337 (2) The Designee shall establish aspirational percentage goals for apprentices who are
338 women and people of color using similar factors. Contractors may be allowed to
339 offer utilization below the aspirational percentage goals by substituting other efforts
340 to meet the intent of building a trained construction workforce for a portion of the
341 utilization percentages for women and people of color.

342
343 G. When determining whether the percentage of Priority Hire requirements has been
344 achieved, the Designee shall exclude from the calculation labor hours performed by residents of
345 states other than the state of Washington. The Designee shall track labor hours performed by
346 residents of states other than the state of Washington and shall review this percentage
347 annually with the previously established Regional Public Owners Group and any future regional
348 Priority Hire advisory committee that may be established under an agreement with one or
349 more other government entities with Priority Hire programs.

350
351 H. Per Resolution 3725, as amended, the Designee shall support the inclusion of Priority
352 Hire provisions in the PLA standard language to be approved by the Commission Projects and
353 Procurement Committee. In furthering Resolution 3725, as amended, Port staff will seek an
354 agreement with regional partners to develop a framework to achieve operational efficiencies
355 through uniform Priority Hire requirements and by sharing Priority Hire resources and data and
356 advancing workforce development efforts.

357
358 SECTION 6. Program Evaluation.

359
360 A. The Designee shall establish benchmarks and metrics to evaluate the program, such as
361 project or procurement costs; completion times, workplace safety; utilization rates and
362 graduation rates of Priority Workers, women and people of color from pre-apprentice and
363 apprentice training programs; and changes in the amount of contracting dollars paid to Small
364 Business and Women and Minority Business Enterprises (WMBE) firms working on Projects and
365 the number of Small Business and WMBE firms under contract.

366
367 B. Port efforts in pursuit of the objectives of this Policy Directive will be incorporated into
368 the Port's Long Range Plan (LRP) to the fullest extent reasonable, including incorporation into the
369 LRP scorecards, reports, and LRP updates. Further, the Designee shall prepare and publish an
370 annual report each year titled Apprenticeship and Priority Hire Annual Report.

371
372 The report shall include, but not be limited to the following:

- 373
374 (1) The number and kinds of construction projects and contracts on which apprenticeship
375 and Priority Hire requirements were established;
376 (2) The percentage of labor hours actually worked by apprentices and Priority Workers on
377 each such project and the total number of labor hours on each project;
378 (3) The number of apprentices and Priority Workers by contractor broken down by trade
379 and craft category, the wages paid by category of work or trade, the number and
380 percentage of women and people of color utilized as apprentices and Priority Workers
381 and the degree of compliance with the percentage requirements and aspirational
382 goals to be established under this Policy Directive;
383 (4) The number of apprentices and Priority Workers per Port dollar spent on the program;
384 (5) A description of problems encountered in the implementation of the program;
385 (6) A description of barriers encountered by participating apprentices and Priority
386 Workers and steps taken to resolve those problems and to ensure their continued
387 participation in the program;
388

389 C. The Commission, Executive Director, and Designee will review program results annually
390 as part of the LRP update to determine if the program should be expanded or amended by
391 increasing or decreasing requirements and aspirational goals.

392
393 SECTION 7. Fiscal Implications.

394
395 This Policy Directive has fiscal implications as funding and staffing requirements will be needed to
396 implement the Priority Hire program. Fiscal implications will be reviewed by the Designee
397 annually, at a minimum, to determine if additional funding and/or resources are required and
398 shall submit a budget request, as appropriate.

399
400 SECTION 8. Research Findings

401
402 Based on studies commissioned by the City of Seattle and King County and their
403 implementation of Priority Hire programs, and numerous public discussions, the Port
404 Commission finds that it is in the Port's and the public's best interest to increase the supply of
405 qualified construction workers, particularly those historically underrepresented in the
406 construction industry, including those who live in Economically Distressed Areas in King County
407 and also within that group, women and people of color.

408
409 A. In January 2015, following the positive results of a pilot program on the Elliott Bay
410 Seawall project, the City of Seattle adopted Ordinance No. 124690, an Ordinance relating to
411 establishing a Priority Hire policy to ensure better access to training programs and well-paying
412 construction jobs for local workers, as well as to increase the diversity of the workforce on City
413 projects.

414
415 B. The City implemented the Priority Hire Ordinance through a Community Workforce
416 Agreement (CWA) between the City and the building trade labor unions, and that agreement
417 requires that prime contractors on City public works construction projects of \$5 million or
418 more, must ensure that a certain percent of project labor hours are performed by workers
419 living in Economically Distressed Areas of Seattle and King County.

420
421 C. In May 2016, the King County Executive directed county agencies to implement a
422 Priority Hire pilot program that prioritized economically disadvantaged local workers for
423 inclusion on large King County capital construction projects. King County is considering a
424 permanent Priority Hire program implemented through a CWA.

425
426 D. Based on studies commissioned by the City of Seattle and King County and their
427 implementation of Priority Hire programs, and numerous public discussions, the Port
428 Commission finds that it is in the Port's and the public's best interest to increase the supply of

429 qualified construction workers, particularly those historically underrepresented in the
430 construction industry, including women, racial minorities, and those who live in Economically
431 Distressed Areas of Seattle and King County.

432
433 E. King County completed a study in January 2016 documenting a widening gap between
434 the demand for construction labor and the supply of skilled trade workers in the regional labor
435 market for King County and other public entities. The gap reinforces the urgent need for
436 developing a strategy to address the current and projected workforce shortages. The study also
437 used economic data involving poverty levels, employment and educational attainment to
438 determine Economically Distressed Areas, which are identified by zip code.

439
440 F. King County completed The Construction Workforce Analysis in December 2016 and
441 found that the county may reasonably anticipate a reduced surplus of qualified labor and possible
442 labor shortages in certain construction trades by 2020. That is the result of a projected shortfall
443 forecast between demand and supply of four thousand six hundred thirty workers by 2020. The
444 county is concerned that these labor shortages will increase reliance on out-of-state construction
445 workers and that the demand for new construction workers may increase construction costs on
446 the county's public works projects unless the county supports efforts to increase the supply of
447 trained apprentices and journey level workers for local public works projects.

448
449 The analysis also found that 81 percent of the construction workforce in King County in
450 2016 were white males, while 19 percent were people of color and women. Representation of
451 women and people of color is higher among new entrants to the labor force through
452 apprenticeships and accredited certificates of completion, such as those received for completing
453 a pre-apprenticeship program. However, according to the analysis, women and people of color
454 also have lower rates of apprenticeship completion than do their white male counterparts.

455
456 G. The City of Seattle commissioned the Construction Industry Labor Market
457 Assessment, which found that women, irrespective of race, are underrepresented in the
458 construction industry. Between 2009 and 2013, 10 percent fewer women finished their
459 apprentice training program than males. The assessment also found that between 2009 and
460 2013, 14 percent fewer racial minority apprentices finished their apprentice training program
461 than white apprentices. In addition, it also found that underrepresented workers face barriers
462 to completing apprentice training. Between 2009 and 2013, 65 percent of the racial minorities
463 exiting apprenticeships did not complete the programs compared to 51 percent of the white
464 apprentices who failed to complete the program. During that same time period, 65 percent of
465 all women, irrespective of race, failed to complete their programs compared to 55 percent of all
466 men.

467

468 H. The City of Seattle has found that Priority Hire effectively and successfully increases
469 diversity on City construction projects. The share of labor hours between November 2013 and
470 April 2017 saw an increase of 233 percent in rate of hours performed by workers living in
471 Seattle's economically distressed zones. In addition, it saw an over 300 percent increase in rate of
472 hours performed by apprentice women and 200 percent increase in rate of hours performed by
473 African Americans.

474
475 I. A PLA is an effective tool to manage public works projects when reducing the risk of
476 project delays and reducing the potential of labor disruptions and labor shortages.

477
478 J. Priority Hire is an effective tool to create local jobs, enhance workforce diversity and
479 improve overall working conditions.