

Board Report

Los Angeles County
Metropolitan Transportation
Authority
One Gateway Plaza
3rd Floor Board Room
Los Angeles, CA

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EXECUTIVE MANAGEMENT COMMITTEE CONSTRUCTION COMMITTEE AUGUST 18, 2016

SUBJECT: PROJECT LABOR AGREEMENT/CONSTRUCTION CAREERS POLICY (PLA/CCP) REPORT (DATA THROUGH JUNE 2016), AND 12-MONTH PILOT LOCAL HIRE INITIATIVE

ACTION: RECEIVE AND FILE

RECOMMENDATION

RECEIVE AND FILE status update report on the **Project Labor Agreement and Construction Careers policy programs** through the quarter ending June 2016.

ISSUE

In January 2012, the Board approved the Project Labor Agreement with the Los Angeles/Orange Counties Building and Construction Trades Council and the Construction Careers Policy. One benefit of the PLA is to encourage construction employment and training opportunities in economically disadvantaged geographic areas throughout the United States. Another benefit of the PLA is that work stoppages are prohibited.

Consistent with the Board approved PLA and CCP prime contractors are required to provide Metro with monthly reports detailing progress towards meeting the targeted worker hiring goals. Additionally, consistent with Metro's Labor Compliance policy and federal Executive Order 11246, the prime contractors provide Metro with worker utilization data by ethnicity and gender.

The attached report provides the current status (through June 2016) of construction projects subject to the PLA/CCP.

DISCUSSION

There are ten active construction contracts and nine completed contracts with the PLA/CCP program requirements, as of June 2016.

Project Name:	Prime Contractor:	Targeted Worker Goal (40%)	Apprentice Worker Goal (20%)	Disadvantaged Worker Goal (10%)	* Percentage of Disadvantaged Worker Participation that are in the Criminal Justice System Category
Crenshaw/LAX Transit Corridor	Walsh/Shea Corridor Constructors	58.74%	19.31%	12.49%	40.40%
Regional Connector Transit Corridor	Regional Connector Constructors, JV	57.12%	19.62%	8.46%	48.73%
Westside Subway Extension Project, Section 1 – D/B	Skanska-Traylor-Shea, JV	69.83%	15.00%	9.92%	62.26%
Metro Red Line/Metro Orange Line (MRL/MOL) North Hollywood Station West Entrance	Skanska	59.15%	24.34%	18.00%	83.23%
Universal City Pedestrian Bridge	Griffith Company	38.17%	27.98%	9.17%	64.18%
Westside Extension Project Advanced Utility Relocation (La Cienega Station)	Bubalo Construction	67.16%	22.53%	22.79%	27.10%
Metro Blue Line Pedestrian and Swing Gates	Icon-West	50.90%	20.84%	4.36%	0.00%
Division 16 Southwestern Yard	Hensel Phelps/Herzog, JV	29.97%	13.99%	7.01%	98.69%
MRL Pershing Square Canopy Addition and Escalator Replacements	Clark Construction, LLC	72.34%	9.26%	47.81%	0.00%
Patsaouras Plaza POV Relocation, Pavers & Storm Drain Repair	AP Construction	62.17%	22.35%	47.00%	22.24%

In summary, of the ten active construction projects for this reporting period, eight—contractors are exceeding the 40% Targeted Worker goal, five contractors are exceeding the 20% Apprentice Worker goal and five contractors are achieving the 10% Disadvantaged Worker goal.

*Percentage of Disadvantaged Worker Participation that have had involvement with the Criminal Justice System Category

Part of Metro's PLA/CCP workforce requirement is the utilization of Disadvantaged workers on projects. One of the nine criteria for a disadvantaged worker is "having a criminal record or other involvement with the criminal justice system". The data shown in the table above is the percentage of Disadvantaged Workers (based on hours worked) that have criminal records or involvement with the criminal justice system and were given the opportunity to work in Metro's PLA/CCP projects.

Currently Active Contracts

<u>Crenshaw/LAX Transit Corridor Project</u> Prime: Walsh/Shea Corridor Constructors

The Crenshaw/LAX Transit Corridor project contractor has completed 64.35% of the estimated construction work hours for this project. The contractor is currently exceeding the Targeted Worker goal at 58.74%, Disadvantaged Worker goal at 12.49% and the minority participation percentage goals, but not meeting the 20% Apprentice Worker goal at 19.31% and the 6.90% Female Participation goal at 3.11%. The attainment for the 20% Apprentice Worker goal is based on total apprentice-able hours. The contractor has submitted a plan and schedule indicating that the apprentice goal for this project should be achieved in the middle of 2017. Staff will continue to work closely with the contractor towards meeting all worker goals for this project.

Regional Connector Transit Corridor
Prime: Regional Connector Constructors, Joint Venture

The Regional Connector Transit Corridor Project has completed 9.21% of the estimated construction work hours for this project. The contractor is currently exceeding the Targeted Worker goal at 57.12%, and the minority participation percentage goals, but not meeting the 20% Apprentice Worker goal at 19.62%, the 10% Disadvantaged Worker goal at 8.46% and the 6.90% Female Participation goal at 2.85%. The attainment for the 20% Apprentice Worker goal is based on total apprentice-able hours. This project is still in the design-phase with limited construction activities and attainments are in line with the contractor's submitted Employment Hiring Plan which states compliance with the PLA/CCP workforce goals will be met in the latter part of 2016.

Westside Subway Extension Project, Section 1 Design-Build Prime: Skanska-Traylor-Shea, a Joint Venture (STS)

The Westside Subway Extension Project, Section 1 is underway and only 4.76% of the estimated

construction work hours for this project have been performed. The contractor is currently exceeding the Targeted Worker goal at 69.83% and the minority participation percentage goals, but not meeting the 20% Apprentice Worker goal at 15.00%, the 10% Disadvantaged Worker goal at 9.92% and the 6.90% Female Participation goal at 4.74%. The attainment for the 20% Apprentice Worker is based on total apprentice-able hours. This project is in the early stage of the design-phase with limited construction and the attainments are in line with the contractor's submitted Employment Hiring Plan which states compliance with the PLA/CCP workforce goals will be met in Mid-2018.

Metro Red Line/Metro Orange Line (MRL/MOL) North Hollywood Station West Entrance Prime: Skanska

The Metro Red Line/Metro Orange Line (MRL/MOL) North Hollywood Station West Entrance project contractor has completed 91.95% of the estimated construction work hours on this project. The contractor is currently exceeding the Targeted Worker goal at 59.15%, Apprentice Worker Goal at 24.34%, Disadvantaged Worker goal at 18.00%, Female Participation goal at 8.90% and the minority participation percentage goals. The attainment for the 20% Apprentice Worker goal is based on total apprentice-able hours. For this reporting cycle, the Contractor has met all PLA/CCP workforce provisions.

<u>Universal City Pedestrian Bridge</u> Prime: Griffith Company

The Universal City Pedestrian Bridge project contractor has completed 97.80% of the estimated construction work hours on this project. The contractor is currently exceeding the Apprentice Worker goal at 27.98%, and the minority participation percentage goals, but not meeting the 40% Targeted Worker goal at 38.17%, the 10% Disadvantaged Worker goal at 9.17% and the 6.90% Female Participation goal at 1.61%. The attainment for the 20% Apprentice Worker goal is based on total apprentice-able hours. Metro has issued several Notices of Non-Compliance to the Contractor for low attainment on the Targeted Worker goal and will keep the Board updated on the Contractor's progress.

Westside Extension Project Advanced Utility Relocation (La Cienega) Prime: Bubalo Construction

The Westside Extension Project Advanced Utility Relocation project contractor has completed 93.74% of the estimated construction work hours on this project. The contractor is currently exceeding the Targeted Worker goal at 67.16%, Apprentice Worker goal at 22.53%, Disadvantaged Worker goal at 22.79%, and the minority participation percentage goals, but not meeting the 6.90% Female Participation goal at 0.65%. The attainment for the 20% Apprentice Worker goal is based on total apprentice-able hours. For this reporting cycle, the Contractor has met the PLA/CCP workforce provisions.

Metro Blue Line Pedestrian & Swing Gates Prime: Icon-West

The Metro Blue Line Pedestrian & Swing Gates Project contractor has completed 35.72% of the estimated construction work hours on this project. The contractor is currently exceeding the Targeted

Worker goal at 50.90%, Apprentice Worker goal at 20.84% and the minority participation percentage goals, but not meeting the 10% Disadvantaged Worker goal at 4.36% and the 6.90% Female Participation goal at 2.34%. The attainment for the 20% Apprentice Worker is based on total apprentice-able hours. The Contractor submitted an Employment Hiring Plan which states compliance with the PLA/CCP workforce goals will be met by mid-point of construction activities.

<u>Division 16 - Southwestern Yard</u> <u>Prime: Hensel Phelps/Herzog, J.V.</u>

The Division 16 Southwestern Yard Project is underway and only 1.25% of the estimated construction work hours for this project have been performed. This project is in the early stage of the design-phase with limited construction, and as such, is not representative of the typical trades and hours that will be performed on the project. The contractor is currently exceeding the minority participation percentage goals, but not meeting the 40% Targeted Worker goal at 29.97%, the 20% Apprentice Worker goal at 13.99%, the 10% Disadvantaged Worker goal at 7.01% and the 6.90% Female Participation goal at 5.70%. The attainment for the 20% Apprentice Worker is based on total apprentice-able hours. The Contractor submitted an Employment Hiring Plan which states compliance with the PLA/CCP workforce goals will be met by mid-2017. This contract falls under the U.S. DOT's Local Hire Pilot Program.

MRL Pershing Square Canopy Addition and Escalator Replacement Prime: Clark Construction, LLP

The MRL Pershing Square Canopy Addition and Escalator Replacement Project contractor has completed 7.26% of the estimated construction work hours on this project. The contractor is currently exceeding the Targeted Worker goal at 72.34%, Disadvantaged Worker goal at 47.81% and the minority participation percentage goals, but not meeting the 20% Apprentice Worker goal at 9.26% and the 6.90% Female Participation goal at 0.00%. The attainment for the 20% Apprentice Worker is based on total apprentice-able hours. The Contractor submitted an Employment Hiring Plan which states compliance with the PLA/CCP workforce goals will be met by September 2016.

<u>Patsaouras Plaza POV Relocation, Pavers & Storm Drain Repairs</u> <u>Prime: AP Construction</u>

The Patsaouras Plaza Privately-Owned-Vehicle Relocation, Pavers and Storm Drain Repairs Project contractor has completed 32.89% of the estimated construction work hours on this project. The contractor is currently exceeding the Targeted Worker goal at 62.17%, Apprentice Worker goal at 22.35%, Disadvantaged Worker goal at 47.00% and the minority participation percentage goals, but not meeting the 6.90% Female Participation goal at 0.00%. The attainment for the 20% Apprentice Worker is based on total apprentice-able hours. For this reporting cycle, the Contractor has met the PLA/CCP workforce provisions.

Completed Contracts

Completed Projects:	Prime Contractor:	Targeted Worker Goal (40%)	Apprentice Worker Goal (20%)	Disadvantaged Worker Goal (10%)	*Percentage of Disadvantaged Workers that are in the Criminal Justice System Category
Crenshaw Advanced Utility Relocation Project	Metro Builders	61.41%	13.84%	21.08%	2.90%
Westside Subway Extension Advanced Utility Relocation	Metro Builders	67.47%	11.12%	11.08%	0.00%
Westside Subway Exploratory Shaft	Innovative Construction Solutions	50.88%	75.05%	11.23%	96.23%
Regional Connector Transit Corridor Adv. Utility Relocation	Pulice Construction	51.61%	21.37%	22.83%	28.39%
CNG Emergency Generator Division 7 & 8	Taft Electric	46.42%	25.51%	39.08%	39.48%
Division 13 CNG Fueling Facility, Design/Build/Operate	Clean Energy	67.54%	20.17%	60.72%	49.48%
Metro Blue Line Stations Refurbishments	S.J. Amoroso	56.01%	26.10%	13.62%	28.03%
Westside Extension Project Advanced Utility Relocation (Fairfax Station)	WA Rasic	63.27%	20.61%	19.90%	9.24%
Metro Rail Security Kiosks	Icon-West	45.90%	27.06%	20.17%	100.00%

Crenshaw Advanced Utility Relocation Project

Prime: Metro Builders

The Crenshaw Advanced Utility Relocation project is 100% complete as of September 2014. Final reporting shows the Targeted Worker attainment at 61.41%, Disadvantaged Worker attainment at

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21.08% and the minority participation percentage goals were attained, but the contractor did not meet the 20% Apprentice Worker goal at 13.84% and the 6.90% Female Participation goal at 0.52%. The attainment for the 20% Apprentice worker goal is based on total apprentice-able hours. Metro staff met with the contractor in January 2015, and executed a special assessment for not meeting the apprentice goal for this project. The contractor complied with Metro's special assessment and this issue is closed.

Westside Subway Extension Advanced Utility Relocation

Prime: Metro Builders

The Westside Subway Extension Advanced Utility Relocation project is 100% complete as of October 2014. Final reporting shows the Targeted Worker attainment at 67.47%, Disadvantaged Worker attainment at 11.08%, Female Participation attainment at 7.48% and the minority participation percentage goals were attained, but the contractor did not meet the 20% Apprentice Worker goal at 11.12%. The attainment for the 20% Apprentice worker goal is based on total apprentice-able hours. Metro staff met with the contractor in January 2015, and executed a special assessment for not meeting the apprentice goal for this project. The contractor complied with Metro's special assessment and this issue is closed.

Westside Subway Exploratory Shaft

Prime: Innovative Construction Solutions (ICS)

The Westside Subway Extension Exploratory Shaft project is 100% complete as of October 2014. Final reporting shows the Targeted Worker attainment at 50.88%, Apprentice Worker attainment at 75.05%, Disadvantaged Worker attainment at 11.23% and the minority participation percentage goals were attained, but the contractor did not meet the 6.90% Female Participation goal at 0.42%. The attainment for the 20% Apprentice worker goal is based on total apprentice-able hours. No labor grievances occurred on this project.

Regional Connector Transit Corridor Advanced Utilities Relocation Prime: Pulice Construction

The Regional Connector Transit Corridor Advanced Utilities Relocation project was terminated for convenience in April 2015 and is now closed. Final reporting shows the Targeted Worker attainment at 51.61%, Apprentice Worker attainment at 21.37%, Disadvantaged Worker attainment at 22.83% and the minority participation percentage goals were attained, but the contractor did not meet the 6.90% Female Participation goal at 2.57%.

CNG Emergency Generator Division 7 and 8

Prime: Taft Electric

The CNG Emergency Generator Division 7 and 8 project is 100% complete as of May 2015. Final reporting shows the Targeted Worker attainment at 46.42%, Apprentice Worker attainment at 25.51%, Disadvantaged Worker attainment at 39.08% and the minority percentage goals were attained, but the contractor did not meet the 6.90% Female Participation goal at 4.68%. The attainment for the 20% Apprentice worker goal is based on total apprentice-able hours. No labor grievances occurred on this project.

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<u>Division 13 CNG Fueling Facility, Design/Build/Operate</u> Prime: Clean Energy

The Division 13 CNG Fueling Facility, Design/Build/Operate project contractor is 100% complete as of June 2015. Final reporting shows the Targeted Worker attainment at 67.54%, Apprentice Worker attainment at 20.17%, Disadvantaged Worker attainment at 60.72% and the minority percentage goals were attained, but the contractor did not meet the 6.90% Female Participation goal at 1.69%. The attainment for the 20% Apprentice worker goal is based on total apprentice-able hours. No labor grievances occurred on this project.

Metro Blue Line Station Refurbishments Prime: S.J. Amoroso

The Metro Blue Line Station Refurbishments project contractor is 100% complete as of August 2015. Final reporting shows the Targeted Worker attainment at 56.01%, Apprentice Worker attainment at 26.10%, Disadvantaged Worker attainment at 13.62% and the minority percentage goals were attained, but the contractor did not meet the 6.90% Female Participation goal at 0.48%. The attainment for the 20% Apprentice Worker goal is based on total apprentice-able hours.

Westside Subway Extension Advanced Utility Relocation (Fairfax Station) Prime: W.A. Rasic

The Westside Subway Extension Advanced Utility Relocation - Fairfax Station project is 100% complete as of December 2015. Final reporting shows the Targeted Worker attainment at 63.27%, Apprentice Worker attainment at 20.61%, Disadvantaged Worker attainment at 19.90% and the minority percentage goals were attained, but the contractor did not meet the 6.90% Female Participation goal at 2.78%. The attainment for the 20% Apprentice Worker goal is based on total apprentice-able hours.

Metro Rail Security Kiosks Prime: Icon-West

The Metro Rail Security Kiosks project contractor is 100% complete as of March 2016. Final reporting shows the Targeted Worker attainment at 45.90%, Apprentice Worker attainment at 27.06%, Disadvantaged Worker attainment at 20.17% and the minority percentage goals were attained, but the contractor did not meet the 6.90% Female Participation goal at 0.00%. The attainment for the 20% Apprentice Worker goal is based on total apprentice-able hours.

FEMALE UTILIZATION UPDATE:

Below is a female utilization participation report on Metro's PLA/CCP projects to track progress. The chart shows the number of cumulative female workers on active PLA/CCP projects within the last three months of FY16, as requested at the July 2015 Committee meeting.

Project Name:	Prime Contractor:	No. of Female Workers April 2016	No. of Female Workers May 2016	No. of Female Workers June 2016
Crenshaw/LAX Transit Corridor	Walsh/Shea Corridor Constructors	77	78	81
Regional Connector Transit Corridor	Regional Connector Constructors, JV	12	12	17
Westside Subway Extension Project, Section 1	Skanska-Traylor-Shea, JV	16	18	19
Metro Red Line/Metro Orange Line (MRL/MOL) North Hollywood Station West Entrance	Skanska	4	5	5
Universal City Pedestrian Bridge	Griffith Company	5	5	5
Westside Extension Project Advanced Utility Relocation (La Cienega Station)	Bubalo Construction	4	4	4
Metro Blue Line Pedestrian and Swing Gates	Icon-West	1	1	2
Division 16 – Southwestern Yard	Hensel Phelps/Herzog, JV	1	2	2
Patsaouras Plaza POV Relocation, Pavers & Storm Drain Repair	AP Construction	0	0	0

In an effort to increase female participation within Metro's PLA/CCP projects which has averaged 3.22% for all active PLA/CCP projects, staff has coordinated or is currently coordinating the following efforts:

Metro convened a "Women Build METRO LA (WBMLA)" Committee to develop strategies and
outreach activities to highlight the need of women in the construction industry, with emphasis on
the opportunities and assistance that is available. The WBMLA Committee members includes:
LA/OC Building and Construction Trades Council Executive Secretary, Ron Miller, Metro's DEOD
Executive Officer, Miguel Cabral, IBEW Vice President, Jane Templin, UNITEHERE President,
Maria Elena Durazo, Women in Non-Tradiitional Employment Roles (WINTER), Deputy Director,

Office of the Speaker of the Assembly, President, Larry Franks, Los Angeles Trade-Technical College, Southwest Carpenters Training Fund, Prime Contractors, Jobs Coordinators and others.

- The Metro "Women Build METRO LA" Committee Pre-Apprenticeship Boot Camp, which began on June 6th, has now graduated 21 women committed to finding work in the Trades.
 - A unique aspect of the training is Metro's commitment to individually introduce the graduates to the Jobs Coordinators of our mega-projects, track the women's progress for one year, whether they work on our projects or on other public/private construction projects.
 - At the graduation luncheon hosted by the WBMLA Committee, motivational presentations were provided by Metro leadership to assure the graduates that all professional women in the vanguard of careers in an industry have faced obstacles that are overcome by fortitude and tenacious commitment to excellence, despite the circumstances.
 - Before acceptance into the Boot Camp, potential candidates went with WMBLA to various Union Apprenticeship Training Centers and completed a volunteer project with Habitat for Humanity. Upon fulfillment of these requirements, candidates were accepted to the intense, 6 week Boot Camp.
 - Additionally, Boot Camp participants received OSHA Safety Training Certificates, met Metro's Prime Contractors, had presentations from Trade Union Representatives and Mr. Ron Miller, Executive Secretary of the Los Angeles/Orange Counties Building and Construction Trades Council, to set realistic expectations and see first-hand what the life in the trades entails.

Staff will continually report on the WBMLA activities and outreach efforts.

PILOT LOCAL HIRE INITIATIVE

In March 2015, the U.S. Department of Transportation (DOT) announced an initiative to permit, on an experimental basis, Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) recipients and sub- recipients the ability to utilize previously disallowed local/geographic-based labor hiring preferences and economic-based labor hiring preferences on Construction and Rolling Stock projects. This initiative was carried out as a pilot program for a period of 1 year and has been extended through March 6, 2017 under the FHWA and FTA's existing Authorities. The Pilot initiative may be implemented immediately on federally funded Construction projects.

While LA Metro has been implementing a local hire program on certain state and locally funded contracts since 2012, as of this quarterly reporting period, there is currently only one construction project that is active and subject to the US DOT Pilot Local Hire Initiative;

C0991 Division 16 - Southwestern Yard (contract amount of \$172mil)

This requirement is also included in the solicitation for the Westside Purple Line Extension Section 2 design build contract. Staff is continually monitoring federally funded PLA/CCP covered projects

awarded during the "Pilot Local Hire Initiative" implementation period and will report any additional projects subject to the Local Hire Initiative Program to the Board.

Metro received DOT and FTA approval on September 30, 2015 to use Metro's Local Employment Program (LEP) on four (4) Rolling Stock procurements. The Local Employment Program may only be applied on an experimental basis on Metro's New Heavy Rail Car, New Bus Buy and two Rail Car Overhaul solicitations. The FTA's approval also contained specific conditions that limit the Local Employment Program to a voluntary program. This means that the program cannot be used to determine responsiveness to the solicitation or as a basis for award. Nonetheless, the Local Employment Program will provide Proposers with an opportunity to receive up to 5% additional preferential scoring points if new jobs are committed as part of their proposal.

The FTA's approval also modified the definition of how Metro may define its geographical preference for new jobs and facility improvements for the New Heavy Rail Car and New Bus RFPs. For those two procurements the definition of local employment will include anywhere in the State of California. For the two rail vehicle overhaul projects the FTA will allow Metro to limit the geographical preference for new job creation to Los Angeles County.

Proposers that volunteer to participate in Metro's Local Employment Program and who commit to new local job creation must also commit to hiring a minimum of 10% of their new work force as Disadvantaged Workers. The targeted hiring requirement will be a condition for obtaining any preferential scoring points.

Currently, the New Heavy Rail Car, A650 Red Line Car Overhaul and P2000 light Rail Car Overhaul RFPs are in Black-out. The A650 Red Line Overhaul is scheduled to be presented to the Board for contract award in September 2016, and the New Heavy Rail Car and P2000 Overhaul are scheduled for November 2016.

Metro is preparing a new Bus Buy RFP for 600 40' CNG buses and 400 60' CNG buses that will be issued in August 2016. Staff also intends to include a requirement for up to 200 electric buses in that same RFP. Staff is preparing an updated application request to the FTA seeking approval to apply the Local Employment Program on all 1200 vehicles, as part of the U.S. Department of Transportation's recent announcement to extend the Local Hire Pilot Program through September 2016.

Staff will continue to report on the "Pilot Local Hire Initiative" on a quarterly basis as part of the Project Labor Agreement/Construction Careers Program quarterly updates.

OUTREACH

In efforts to attain the highest percentages of Targeted, Apprentice and Disadvantaged Workers on PLA/CCP projects, and to keep the community informed of opportunities, the contractors and DEOD participated and/or coordinated the following outreach efforts during this reporting period:

 Daily/Weekly/bi-weekly meetings with outreach team, contractor, elected staffers and/or community representatives.

- Continuous collaboration with Five Keys Charter to promote Metro's PLA/CCP workforce initiatives within Los Angeles County Jail system.
- Women Build METRO LA event held on March 23, 2016.
- Participated in the Resource Fair sponsored by Council District 8 & 10, held on March 12, 2016.
- Women Build METRO LA Union Training Center Tours held on March 23, 2016.
- Participated in the 6th Annual Spring into Summer Hiring Spree Event sponsored by Supervisor Mark Ridley-Thomas held on April 13, 2016.
- Construction Careers Awareness Day in partnership with LAUSD and Los Angeles Trade Tech College (LATTC) held on April 14, 2016.
- Participated in the 15th Annual Job Fair for Foster Youth and Local Community, Office of L.A. County Supervisor, Mike D. Antonovich, held on May 14, 2016.
- City of L.A., Economic and Workforce Development Department, Clean Technology Business Development Forum event held May 16, 2016.
- Participated in East Los Angeles Community College Job Fair held on May 25, 2016.

NEXT STEPS

Staff will continue to monitor and assist Contractors with hiring efforts, and will enforce compliance as necessary.

ATTACHMENTS

A. PLA/CCP Report, Data Through June 2016

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