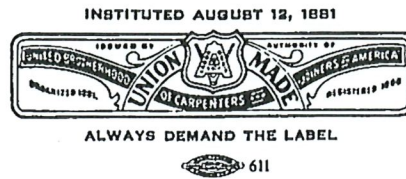


Local Union No. 1109
United Brotherhood of Carpenters and Joiners of America

PHONE (559) 732-5817
FAX (559) 738-8513



8130 W. MINERAL KING AVE.
VISALIA, CA 93291

October 30, 2023

Via Email: brandon.smith@visalia.city

City of Visalia Planning Department
315 E. Acequia Avenue
Visalia, CA 93291

Attn: Brandon Smith, Principal Planner

Re: 6th Cycle Housing Element Update (2023-2031)

Dear Mr. Brandon Smith,

Please accept these comments on the above referenced Housing Element Update on behalf of the members of Carpenters Local 1109, which represents working men and women in the City of Visalia and Tulare County. Local 1109 has long been at the forefront of training the next generation of construction workers, opening pathways to the industry for diverse and traditionally underserved populations, and embracing new technologies and delivery methods to expedite the construction of much needed housing.

We appreciate the opportunity and look forward to working together on this important endeavor.

To meet the urgent need for housing units outlined in the State's Regional Housing Needs Allocation (RHNA), as well as the policy goals outlined in the City of Visalia Housing Element, it is vital that the City support efforts to build the local construction workforce.

However, the City of Visalia's current housing element draft fails to address a major impediment to housing production that other cities have acknowledged and committed to addressing in their own, now-finalized housing elements. Namely, neither the city, nor greater Tulare County have enough skilled, highly productive residential construction workers to build the nearly 10,791 units that it is supposed to produce over an 8-year period.

As part of the 6th Cycle Housing Element process, the City of Visalia must seek to build 10,791 units over an eight-year period. However, as the housing crisis in our communities has

continued to deteriorate in recent years, **the number of workers employed in residential building construction in Visalia lags well behind pre-2008 financial crisis levels, and only recently returned to what it was prior to the COVID pandemic.**¹

A lack of local workforce forces contractors to hire from further afield, which can result in missed economic opportunities for the region, or worse, the importing of questionable labor practices into the community.

Instead, the Housing Element process represents an opportunity for **the City to initiate a path towards the development of a local residential construction labor policy that both begets community benefit and housing production.** This policy should seek to alleviate the labor shortage impediment to housing in the City by investing in the development and retention of workers in the local residential construction labor supply.

To support the policy goals of the Housing Element, Local 1109 is therefore requesting that the City add local hire and apprenticeship requirements to the General Plan and Housing Element for all residential construction projects larger than 10 units. The standards Local 1109 is proposing in this comment letter would help to ensure greater benefits for the broader community, help ensure that construction labor needs are met, and guarantee that new residential development projects within the city are making needed investments in the region's skilled construction industry workforce.

The City Should Bar Issuance of Building Permits Unless Each Future Residential Development of 10 units or Above has a Viable Apprenticeship Program and Local Hiring Requirements

The Carpenters propose the following additions to the Municipal Code of the City of Visalia for any residential project larger than 10 units.

Permitting requirements in the Municipal Code of the City of Visalia.

A person, firm, corporation, or other entity applying for a building permit under the relevant section of the Municipal Code of the City of Visalia, California shall be required to comply with the apprenticeship, healthcare, and local hire requirements of the Housing Element and General Plan. Failure to comply with the requirements set forth in this section shall be deemed a violation of this article.

Apprenticeship:

For every apprenticeable craft, each general contractor and each subcontractor (at every tier for the project) will sign a certified statement under penalty of perjury that it participates in a Joint Apprenticeship Program Approved by the State of

¹ QCEW data: Difference between 2006 employment and 2022 in Private NAICS 2361 Residential building construction for All establishment sizes in Tulare County, California.

California, Division of Apprenticeship Standards **OR** in an apprenticeship program approved by the State of California Division of Apprenticeship Standards that has a graduation rate of 50% or higher and has graduated at least thirty (30) apprentices each consecutive year for the five (5) years immediately preceding submission of the pre-qualification documents. The contractor or subcontractor will also maintain at least the ratio of apprentices required by California Labor Code section 1777.5.

Local Hire Policy:

Contractor will be required to provide documentation that the contractor will hire a minimum of twenty-five percent (25%) of staff for any job classification with more than four (4) employees employed whose primary residence, which is not a post office box, is, and has been, within Tulare County within 180 days of the expected date of issuance of the Notice to Proceed for the project.

As part of making these proposals, Local 1109 wishes to make the City of Visalia aware that other cities in the wider region have incorporated language into their 6th cycle housing elements that does commit to the development of residential construction labor policy. This includes, but is not limited to, the examples below:

Cities including Redwood City, Menlo Park, and Foster City, for example, have included the following language as part of the policy goals in their respective housing elements:

Adopted Housing Element policy goal (Redwood City and Menlo Park):

“Encourage developers and contractors to evaluate hiring local labor, hiring from or contributing to apprenticeship programs, increasing resources for labor compliance, and providing living wages.”²

Adopted Housing Element policy goal (Foster City):

“**Encourage Local Hiring.** Encourage developers and contractors to evaluate hiring local labor, hiring from, or contributing to apprenticeship programs, increasing resources for labor compliance, and providing living wages.

² See, page 322: City of Menlo Park 2023-31 Housing Element. Available at [city-of-menlo-park-2023-2031-housing-element.pdf](https://www.menlopark.gov/files/2023/03/city-of-menlo-park-2023-2031-housing-element.pdf) ([menlopark.gov](https://www.menlopark.gov))

See, page 52: City of Redwood City 2023-31 Housing Element. Available at [REDWOOD-CITY-HE-ADOPTED-2-13-23.pdf](https://www.redwoodcity.org/files/2023/03/REDWOOD-CITY-HE-ADOPTED-2-13-23.pdf) ([welcometohomerwc.org](https://www.welcometohomerwc.org))

Local Labor Program List. Establish and post a list of local labor unions and apprenticeship programs on City's website and encourage the developers and contractors to hire local labor. Responsible Agency: Community Development Department, City Attorney Timeframe: Establish the list by December 2023. Bi-annually update the list or upon requests from the local unions to be added to the list."³

At a minimum, Local 1109 strongly calls on the City of Visalia to incorporate a similar commitment to develop residential labor policy in their own housing element. This will help alleviate a major impediment to housing production: the labor shortage crisis in residential construction.

In addition to the above examples, **other cities have also identified the utility of new legislative tools such as AB 2011,**⁴ which both streamlines housing production while also raising labor standards for local workers. The Carpenters encourage the City of Visalia to also make use of and lead in taking advantage of the opportunity presented by such legislative developments. Other recent legislative developments include the passage of streamlining bills such as **SB4 and SB423.**⁵

While there has been a steady economic expansion in Visalia in recent years, higher than average unemployment adds to the City's affordability crisis and threatens to undermine the region's economy. The current General Plan does not include any goals for workforce development, training, or the need for residents to stay in the area, despite receiving feedback during the Housing Element outreach process that residents move away due to lack of jobs. Local 1109 has a strong track record of developing many programs that will enable the City to create, and then subsequently meet goals to create permanent, well-paying construction jobs needed throughout the region. These programs include a robust Joint Apprenticeship Training Committee, vigorous utilization of apprentices in the City of Visalia, healthcare coverage for all members and their families, and innovation within the construction industry.

Joint Apprenticeship Training Committees (JATC's), such as the Carpenters Training Committee for Northern California (CTCNC), are a proven method of career training built around a strong partnership between employers, training programs and the government. This tripartite system is financially beneficial not only for the apprentice but is a major benefit for the employer and the overall economy of the City of Visalia. The CTCNC monitors current market conditions and adjusts the workflow of apprentices to meet the needs of the community, heading off any shortage of skilled workers. History has demonstrated that strong utilization of apprentices throughout the private sector helped California builders produce millions of units of housing.

CTCNC recruitment strategies include robust diversity and inclusionary outreach programs, such as pre-apprenticeship, with proven results in representative workplaces and strong local economies. It is imperative that our underserved populations have supportive and effective

³ See, page 82: City of Foster City 2023-31 Housing Element. Available at <https://engagefostercity.org/housing-element>

⁴ See, page 28: County of Santa Cruz 2023-31 Housing Element. Available at [2023 Housing Element \(sccoplanning.com\)](https://www.sccoplanning.com/2023-Housing-Element)

⁵ See, e.g., [Governor Newsom Signs Package to Streamline Housing and Expand Tenant Protections in California | California Governor](#)

pathways to viable construction careers, while ensuring that employers are able to find and develop the best and brightest talent needed to thrive in a competitive economy.

Employer-paid health insurance plans for our members and their families provides preventative services to stay healthy and prevent serious illness. Timely care reduces the fiscal burden for our members and their families, and significantly reduces the utilization of safety-net programs administered by the City of Visalia and Tulare County.

Embracing new technologies and delivery systems will have a significant impact on the construction industry, particularly the residential sector. Increasing housing delivery methods reduces project durations and provides Visalia residents housing sooner. Local 1109 is at the forefront of ensuring that new construction technologies deliver those benefits while also creating work opportunities for those already in the trades as well as those looking to begin a construction career.

Local 1109 is in a unique position to address many of the key ideas outlined in the City of Visalia Housing Element Update. By investing in the training and utilization of apprentices, performing outreach to ensure that the workforce closely mirrors the demographics of our local community, providing employer-paid healthcare for our members and their families, and promoting innovation in the residential construction sector, Local 1109 is prepared to assist in closing the affordability gap in the City of Visalia and greater Tulare County.

We look forward to engaging City staff and elected leaders as the Housing Element moves forward and working cooperatively to bridge the needs of the City with the skills and tools of Local 1109.

Sincerely,

Jayson Martinez
Senior Field Representative
Carpenters Local 1109

A handwritten signature in blue ink, appearing to read 'Jayson Martinez', with a long horizontal flourish extending to the right.