



July 1, 2021

The Honorable Autumn Burke  
Member, California State Assembly  
State Capitol, Room 5150  
Sacramento, CA 95814

**RE: Assembly Bill 680 – OPPOSE  
As Amended June 30, 2021**

Dear Assembly Member Burke:

On behalf of the Rural County Representatives of California (RCRC), I write to regretfully inform you of our opposition to your Assembly Bill 680, which would enact the California Jobs Plan Act of 2021 and update guidelines for projects funded by the Greenhouse Gas reduction Fund (GGRF). RCRC is an association of thirty-five rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from each member county.

AB 680 would update the funding guidelines for the GGRF by July 1, 2023, including requiring prevailing wage for construction projects funded in full or part by GGRF grants. AB 680 would also require entities receiving grants of \$1 million or more for construction projects to provide evidence of a project labor agreement, and would give preference to applicants that demonstrate a partnership with an educational institution or training program targeting residents of disadvantaged, tribal, and low-income communities in the same region as the proposed project.

RCRC is extremely concerned that AB 680 will have profound impacts on the ability for local governments to execute much needed forest health and resilience projects in high fire risk areas where a skilled local workforce is already difficult to secure. The ability to utilize GGRF dollars through programs like California Climate Investments has afforded rural local governments the ability to undertake such vital projects as clearing dead and dying trees from critical infrastructure and residential properties during California's recent tree mortality epidemic, as well as completing community wildfire mitigation projects in concert with local fire prevention organizations.

By leaving the definition of "construction" ambiguous, we are concerned that vital wildfire mitigation projects will be folded into the requirements of AB 680, further

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disadvantaging rural, fire prone communities that already lack resources to complete forest resilience projects and desperately need the ability to access funding such as the GGRF. Expanding the requirement to pay prevailing wage to vegetation management projects funded by GGRF will increase the cost of those projects and reduce the number of acres that can be treated the finite revenues available. Furthermore, a requirement to use a project labor agreement on all projects that receive over \$1 million in GGRF revenues will impact nearly all projects funded by the state. It is not clear that this is feasible in rural areas given the available labor supply and the amount of work that must be performed. Finally, requiring administering agencies to give preference to applicants with partnerships with education or training organizations will help ensure that small, low population, low income rural counties without such resources will be precluded from much needed GGRF funding.

In order to ensure that vital forest resilience projects are not impacted by AB 680, RCRC would submit either of the following amendments for consideration:

Option 1: Amend page 3, line 26 as follows:

**(e) Construction project and construction work have the same definitions as “public works” in Labor Code Section 1720.**

Option 2: Amend page 3, line 26 and page 5, lines 14 through 20 as follows:

**(e) “Public works” has the same definition as Labor Code Section 1720.**

38599.11. (a)(3) Prevailing wage for any **public works** ~~construction work~~ funded in part or in full by the grant.

(b) On and after the adoption of the update pursuant to subdivision (a), all of the following shall apply:

(1) Applicants seeking over one million dollars (\$1,000,000) in funding for **public works** ~~construction projects~~ shall provide evidence of a community workforce agreement.

RCRC has met with your staff regarding our position on AB 680 numerous times and appreciates their willingness to discuss our concerns and suggested amendments. However, we regretfully have not been able to reach a mutually satisfactory outcome. We look forward to continued discussions on AB 680 and are hopeful that we can continue moving toward a solution. If you should have any questions or concerns regarding RCRC's position, please do not hesitate to contact me at [sheaton@rcrcnet.org](mailto:sheaton@rcrcnet.org) or (916) 447-4806.

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Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton". The signature is fluid and cursive, with a large initial "S" and a long, sweeping underline.

STACI HEATON  
Senior Regulatory Affairs Advocate

cc: Members of the Senate Environmental Quality Committee  
Consultant, Senate Environmental Quality Committee