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# *Office of Inspector General*

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**Review of**  
**Alameda Corridor**  
**Project**

**Report Number: TR-1999-010**  
**Date Issued: October 16, 1998**





# Memorandum

U.S. Department of  
Transportation

Office of the Secretary  
of Transportation

Office of Inspector General

Subject: INFORMATION: Report on Review of  
Alameda Corridor Project

Date: October 16, 1998

From:   
Raymond DeCarli  
Deputy Inspector General

Reply to  
Attn of: JA-30:x60687

To: The Secretary  
Thru: The Deputy Secretary

On May 27, 1998, the Associate Deputy Secretary and Director of the Office of Intermodalism forwarded to the Office of Inspector General (OIG) a letter you received from Congresswoman Juanita Millender-McDonald dated May 11, 1998, regarding the Alameda Corridor project. He requested OIG review the Congresswoman's concerns related to a program to train and hire local residents on the project. Congresswoman Millender-McDonald also wrote directly to OIG on July 11, 1998, requesting us to review the matter. The report on our review follows this memorandum. We found:

- The Alameda Corridor Transportation Authority's (ACTA) estimate of 10,520 "jobs" was subject to gross misinterpretation: ACTA's projection does not mean 10,520 people will be working on the project at any one time during the project's 7-year life. Instead, according to ACTA, each "job" generally equated to a year of work, but also included some positions expected to last less than a full year. This means ACTA's projection of 10,520 "jobs" equates to an average of about 1,500 jobs per year over the 7 years. Using a 1996 ACTA insurance estimate that the project will require 12.4 million hours of trade work and a Federal Highway Administration (FHWA) formula for estimating highway construction employment, we independently calculated that the project will generate an annual average of about 1,325 staff-years of work over its projected 7-year life.
- ACTA has established that at least 30 percent of the hours worked by new employees must be worked by residents of the local communities. Based on this requirement, the minimum number of "jobs" that can be expected in the local communities averages 400 per year. This estimate assumes the project

meets our prediction of an average of 1,325 jobs annually and is staffed entirely by new hires.

- The agreement implementing the Department's \$400 million loan to ACTA did not specify the Federal regulations that would apply to the project. The Department and ACTA are negotiating an amendment to the agreement to stipulate which regulations ACTA will follow.
- ACTA established comprehensive contractual requirements and controls over the new hire employment program, but will need diligent contract administration to ensure the requirements are met. ACTA also needs to strengthen the controls for its training program.
- ACTA's Disadvantaged Business Enterprise participation goal exceeds the Federal goal, and ACTA's guidance to the contractor for implementing the program is in line with Federal regulations.

We will transmit a copy of this report together with suggestions for improving the administration of the new hire and job training programs to ACTA. A copy will also be forwarded to Congresswoman Millender-McDonald.

If you have any questions or require additional information concerning this report, please call me at x66767 or Deputy Assistant Inspector General for Surface Transportation, Patricia J. Thompson, at x60687. We appreciate the cooperation and courtesies extended to us during the review.

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## EXECUTIVE SUMMARY

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### *Alameda Corridor Project Federal Highway Administration*

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#### *Objectives*

In response to written requests from Congresswoman Juanita Millender-McDonald to the U.S. Secretary of Transportation on May 11, 1998, and to the Office of Inspector General (OIG) on July 11, 1998, we conducted a review of the Alameda Corridor project. Specifically, we reviewed the following issues raised in Congresswoman Millender-McDonald's letters:

- whether the Alameda Corridor Transportation Authority (ACTA) misrepresented the number of jobs that would be created; and
- whether ACTA's procedures regarding the Disadvantaged Business Enterprise (DBE) program and the job training program will ensure compliance with applicable Federal regulations.

#### *Background*

The Alameda Corridor project will construct a high-capacity rail corridor to consolidate rail traffic to and from the ports of Los Angeles and Long Beach from four separate routes onto a single route extending from the ports about 20 miles to the rail yards near downtown Los Angeles. The project will eliminate or reduce traffic at about 200 street level crossings, which will improve safety and allow higher train speeds. Once completed, the Alameda Corridor is expected to improve the efficiency of rail operations that link the ports to destinations throughout North America.

The Alameda Corridor project is divided into three segments: the North End, Mid-Corridor, and South End. The total cost of the project is currently estimated at about \$2.1 billion (Figure 2, page 2). In the Mid-Corridor segment, the rail line will be contained within a trench 47 feet wide, 33 feet deep, and 10 miles long. With an estimated cost of \$958 million, the Mid-Corridor segment is the most expensive segment of the project. The Mid-Corridor segment is financed in part with a \$400 million direct loan from the U.S. Department of Transportation (DOT) to ACTA.

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## ***Results***

### ***Summary***

We found that ACTA's predictions regarding the number of jobs to be created were subject to gross misinterpretation, and the project will average about 1,325 "jobs" annually over the 7-year life of the project. Although the agreement implementing DOT's direct loan to ACTA did not specify which Federal regulations would apply, DOT and ACTA are currently negotiating an amendment to ensure inclusion of appropriate Federal regulations. ACTA has established detailed contractual requirements and controls over the new hire employment program, but diligent contract administration will be necessary to ensure the contractor meets the requirements. We found the controls over the training program are deficient in that they do not ensure that trainees are Corridor residents and that training facilities are accessible to all Corridor residents. This needs to be corrected. Finally, we found ACTA's DBE participation goal exceeds the Federal goal, and ACTA's guidance to the contractor for implementing the program is in line with Federal regulations.

### ***Fewer jobs will be created than expected***

In a June 1995 report, ACTA predicted that "approximately 10,500 direct construction jobs will result from the Alameda Corridor project" and provided a chart that showed 10,520 jobs distributed over 7 years between 1995 and 2001. Other ACTA promotional literature repeated the overall number without further explanation, leaving some to conclude the project would mean continuous work for 10,520 people. Instead, according to ACTA, the 1995 projection actually meant that there would be 10,520 "jobs" over the 7-year life of the project. This equates to an average of 1,500 "jobs" each year. Using a 1996 ACTA insurance estimate that the project will require 12.4 million hours of trade work and a Federal Highway Administration (FHWA) formula for estimating highway construction employment, we independently calculated that the project will generate about 9,250 staff-years of work, or an annual average of 1,325 "jobs" on the project over its projected 7-year life. ACTA has established that at least 30 percent of the hours worked by new employees must be worked by residents of the local communities. Assuming the project 1) meets our prediction of an average of 1,325 "jobs" annually and 2) is staffed entirely by new hires, the residents of the communities would be targeted to receive an average of about 400 "jobs" annually.

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*Federal-aid requirements do not apply to the Mid-Corridor*

Congress provided partial Federal financing for the Mid-Corridor through a \$400 million loan to ACTA under the Railroad Revitalization and Regulatory Reform Act of 1976 (Act). Because the funds were provided as a loan under the Act, Federal-aid regulations that normally apply to transportation projects receiving Federal money do not automatically apply to the Mid-Corridor segment. Further, the loan agreement negotiated between ACTA and DOT did not specify which Federal regulations would apply to the project. The Department is currently negotiating with ACTA an amendment to the loan agreement to stipulate which Federal regulations will apply to the Mid-Corridor segment.

*Controls over training program have weaknesses*

The Mid-Corridor project includes a program for employing and training residents of the local communities affected by the project. This program consists of two general requirements. First, residents of the local communities must be included among those hired to work on the project: 30 percent of the hours worked by new employees hired for the project (i.e., employees not already on the payroll for 60 days) must go to Corridor residents. Second, the contractor must provide training to 1000 Corridor residents. ACTA encourages, but does not require, the contractor to employ the trainees on the project. We found ACTA has established detailed administrative controls that require the contractor to track and report on its efforts to employ Corridor residents on the project. Nonetheless, diligent contract administration will be necessary to verify the accuracy of the reported data and to follow up on any discrepancies or failure by the contractor to meet the requirements. In reviewing the training program controls, we found the contractor is not required to identify trainees by name and address, which prevents ACTA from confirming that these individuals are local residents. Also, in its current form, the program could allow the contractor to concentrate job training in one area of the Corridor to the exclusion of other communities. Requirements are needed to ensure residents in each community have access to training opportunities.

*The DBE program meets or exceeds Federal requirements*

We found ACTA's guidance for the establishment and control of its overall DBE program is in line with Federal regulations. Furthermore, ACTA has established a goal of 22 percent DBE participation, which exceeds the 10 percent goal set by Federal regulations.

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**Attachment A: Objectives, Scope, and Methodology**

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**ALAMEDA CORRIDOR PROJECT**  
**JOB DEVELOPMENT AND TRAINING PROGRAM**

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**SECTION I - BACKGROUND**

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**The Alameda Corridor**

The Alameda Corridor has been a primary route for moving freight from the Ports of Los Angeles and Long Beach to downtown Los Angeles since 1852. In the 1980s, studies by the Southern California Association of Governments and the Ports regarding the ability of the area's rail and highway transportation systems to accommodate growing port traffic recommended construction of a consolidated rail corridor. In August 1989, the Consolidated Transportation Corridor Joint Powers Authority, later renamed the Alameda Corridor Transportation Authority, was created to develop, own, and operate a consolidated railway.

The Alameda Corridor will consolidate rail traffic that currently traverses four separate routes covering 90 miles of track onto a single 20-mile, high capacity corridor. The construction of the corridor is divided into three project segments: the North-End, Mid-Corridor, and South-End. Each segment receives funding from different sources and will be contracted for separately. Currently, the Alameda Corridor project is expected to be completed in 2001 (Figure 1) at a total cost of \$2.1 billion (Figure 2).

**The Mid-Corridor segment.** In the Mid-Corridor segment, the rail line will be contained within a trench 47 feet wide, 33 feet deep, and 10 miles long. With an estimated cost of \$958 million in design, construction, overhead, and contingency costs (as of August 14, 1998), the Mid-Corridor is the most expensive segment of the project. The Mid-Corridor segment will be financed with funds from a local revenue bond that ACTA plans to issue in late 1998, and a \$400 million direct loan from the DOT to ACTA. Congress funded the loan through a Fiscal Year 1997 appropriation under the authority of Section 505 of the Railroad Revitalization and Regulatory Reform Act of 1976. Figure 3 depicts the path of the Corridor from the Ports to Los Angeles. ACTA expects to award one contract for the design and construction of the Mid-Corridor segment in October 1998.



**Figure 1 – Alameda Corridor Project Major Milestones**

<u>Milestone:</u>	<u>Construction to Start</u>	<u>Projected Completion</u>
<u>North End Projects:</u>		
- Los Angeles River Bridge	5/97	10/98 (on schedule)
- Santa Fe/Wash Blvd Grade Separation	1/99	3/01
- Redondo Junction	8/98	12/00
Mid-Corridor Project:	10/98	3/01
<u>South End Projects:</u>		
- Henry Ford Avenue	7/99	2/01
- Compton Creek/Dominguez Channel	3/99	8/00

**Figure 2 - Sources of Funds: \$2.103 Billion Total Cost**

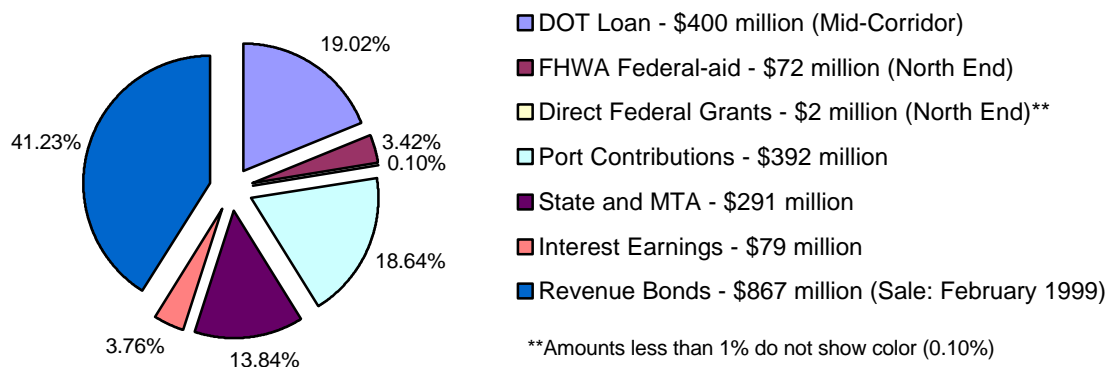
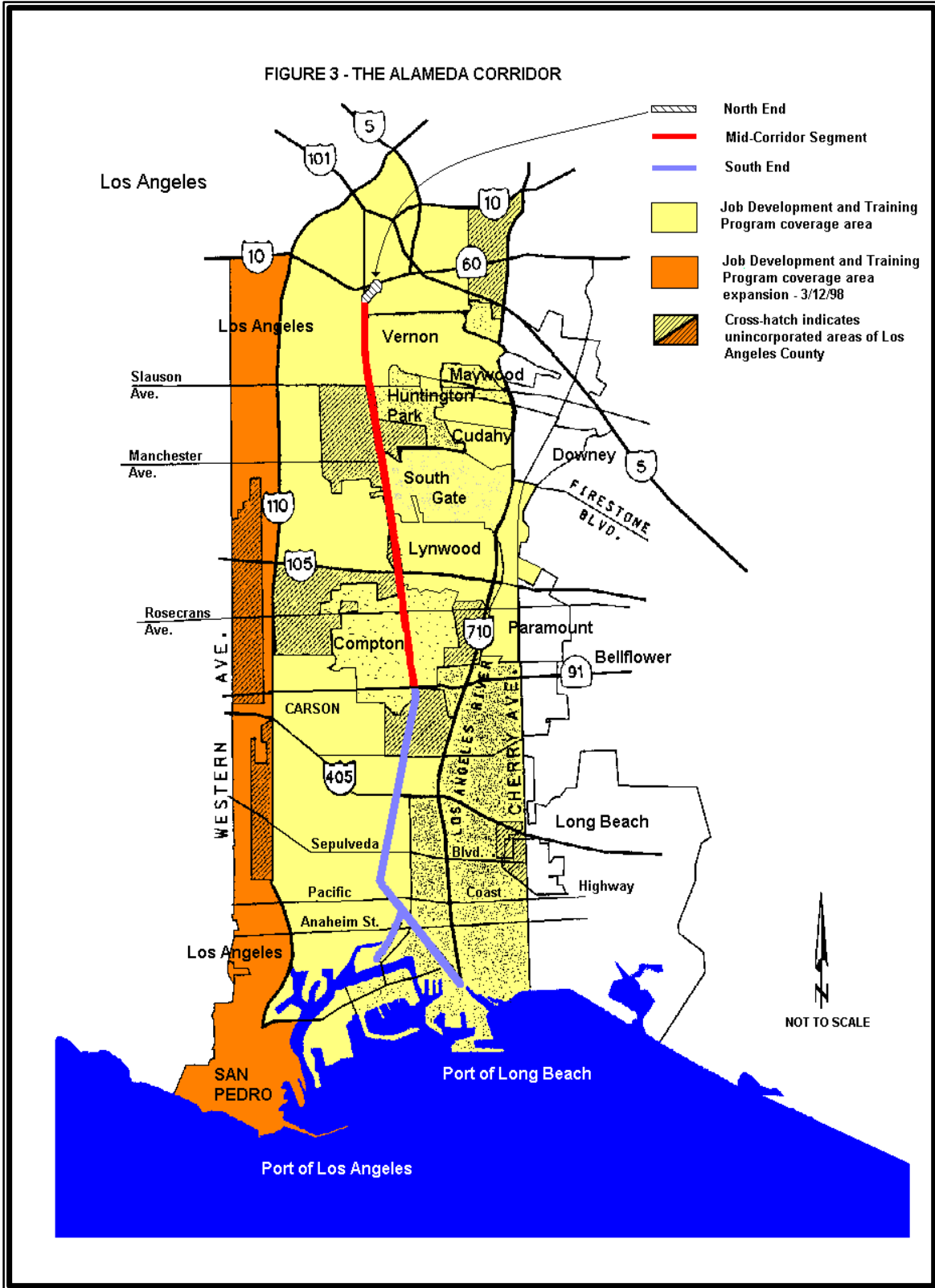


FIGURE 3 - THE ALAMEDA CORRIDOR



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## SECTION II - RESULTS

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### SUMMARY

We found that ACTA's claims regarding the number of jobs to be created were subject to gross misinterpretation. The project will not employ 10,520 people at any one time. We estimate instead that the project will average about 1,325 staff-years of work per year, for a total of about 9,260 over the projected 7-year life of the project. Although the agreement implementing DOT's direct loan to ACTA did not specify which Federal regulations would apply, DOT and ACTA are currently negotiating an amendment to ensure inclusion of appropriate Federal regulations. ACTA has established detailed contractual requirements and controls over the employment program, but diligent contract administration will still be necessary to ensure the contractor meets the requirements. We found the controls over the training program are deficient in that they do not ensure that trainees are Corridor residents and all Corridor residents have access to the training opportunities. This needs to be corrected. Finally, we found ACTA's DBE participation goal exceeds the Federal goal, and ACTA's guidance to the contractor for implementing the program is in line with Federal regulations.

### A. ACTA'S "JOB" ESTIMATES

In June 1995, ACTA issued a report entitled Employment, Construction Supplies, and Materials: A Summary of the Economic Opportunities Provided by the Alameda Corridor Project. In the report, ACTA predicted that "approximately 10,500 direct construction jobs will result from the Alameda Corridor project." An accompanying chart showed 9,010 "jobs" in the construction trades and 1,510 professional and technical "jobs" for a total of 10,520 "jobs" distributed over the years 1995 to 2001.<sup>1</sup> However, other ACTA promotional literature repeated the 10,520 total without further explanation. The lack of definition left some to conclude the project would mean continuous work for 10,520 people.

A detailed review of ACTA's methodology to develop the 1995 projection was not possible because the source data and working papers were lost. Nonetheless, in discussions, ACTA's engineers reported that one "job" in the projection generally equated to a year of work. However, positions that were projected to be available for less than a full year were also counted as one "job." Given the description of "job" as a year of work or less, and given the 7-year span of the projection, the

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<sup>1</sup> ACTA's chart indicated the "opportunities" available each year would begin low (170 in 1995), peak in the construction-intensive middle years (3,126 in 1999), and taper off to the project's 2001 finish.

10,520 “jobs” do not represent 10,520 people working on the project at any one time. Rather, the project should generate an average of about 1,500 “jobs” (1,287 trade and 216 professional and technical) per year.

Although we were unable to examine ACTA’s 1995 projection in detail, we were able to use ACTA’s figures and other information to estimate the employment impact of the project. In a 1996 insurance estimate, ACTA identified 12.4 million staff-hours of trade work on the project. Using a Federal Highway Administration standard for projecting employment that equates 1,600 hours to one staff-year of work, we calculated that the project will generate about 7,750 staff-years of trade work, or 1,107 per year over the 7-year life of the project. Combining the 1,107 trade jobs with ACTA’s estimate of 216 professional/technical employee “jobs” yields an estimated average of about 1,325 total “jobs” per year over the project’s 7-year life.

**B. FHWA FEDERAL-AID REGULATIONS NOT APPLICABLE**

The Federal funds for the Mid-Corridor were provided through a direct loan authorized under Section 505 of the Railroad Revitalization and Regulatory Reform Act of 1976 (Act). This financing method significantly altered which Federal regulations apply to the Mid-Corridor segment of the project. Although the loan agreement between DOT and ACTA states, “Borrower hereby agrees to abide by applicable Federal and state laws,” those laws are not specified. As of October 9, 1998, DOT was negotiating with ACTA to amend the loan agreement to list the Federal regulations that will apply to the Mid-Corridor. Figure 4 summarizes the status of the regulations, including those regulations that both parties have tentatively agreed to apply.

<b>FIGURE 4 –APPLICABILITY OF SELECTED FEDERAL REQUIREMENTS TO MID-CORRIDOR TRENCH CONTRACT</b>			
<b>Requirement</b>	<b>Mandatory</b>	<b>Not Mandatory</b>	<b>Complying Voluntarily</b>
Buy America		X	Yes
Davis Bacon (Prevailing wages)		X	Yes
Disadvantaged Business Enterprise		X	Yes*
NEPA Compliance	X		
Environmental Mitigation	X		
Traffic Management Plan	X		
Non-Collusion Provisions		X	Yes
Non-Discrimination and EEO Provisions		X	Yes
Uniform Relocation Act	X		
Utility Relocation Requirements		X	No
Warranty Clauses		X	No

\*Incorporating provision that is substantially equivalent to Federal provisions.

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## **C. JOB DEVELOPMENT, TRAINING, AND DBE PROGRAMS**

To share the benefits of the project with communities along the Corridor, ACTA instituted programs to increase the involvement of Disadvantaged Business Enterprises (DBE) -- i.e., small businesses owned and controlled by socially and economically disadvantaged individuals -- in the construction of the Corridor, and to increase the employment of community residents on the project.

### **ACTA's Job Development and Training Program**

Federal-aid regulations<sup>2</sup> would normally prevent projects receiving Federal-aid funds from instituting job training or employment programs limited to residents in one area. However, because the Federal contribution to the Mid-Corridor is derived from a loan under the Act, ACTA can implement an employment and training program limited to residents of the Corridor communities.

On March 12, 1998, the ACTA Board adopted a Job Development and Training Program and incorporated it as Appendix 12 to the Request for Proposals for the Mid-Corridor contract. At that meeting, the Board also heard statements from interested parties, and then voted to redefine the physical boundaries of the program (see Figure 3 for geographic coverage of the program).

The program consists of two general requirements. First, residents of the local communities must be included among those hired to work on the project: 30 percent of the hours worked by new employees hired for the project (i.e., employees not already on the payroll for 60 days) must go to Corridor residents. Second, the contractor must provide training to 1000 Corridor residents. The requirements of the program regarding employment and training operate independently. For example, ACTA does not require that job training graduates be assigned work on the Alameda Corridor project, although the contractor should "encourage" unions to do so. Instead, graduates of the training program may be placed on other construction projects in the region.

To monitor the compliance of the contractor with the above requirements, Appendix 12 sets forth the steps the contractor must take, and establishes detailed administrative controls to require the contractor to track and report quarterly on its progress in implementing the program. Among other things, to ensure Corridor residents receive 30 percent of new worker hours, the contractor must report how many hours new employees worked and how many of those hours were worked by Corridor residents. For the training program, the contractor is required to report how many Corridor residents are enrolled in and graduate from the program, and

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<sup>2</sup> Title 23 CFR § 635.117(b) prohibits geographic preferences in projects receiving Federal aid.

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how many of the graduates are employed on the Alameda Corridor and other construction projects in the region.

The number of workers who will be subject to the new hire provisions is unclear. On April 16, 1998, the ACTA's General Manager predicted that up to 80 percent of the employees on the project would be classified as new hires. Because the number of new workers depends on the labor force employed by the contractor and each subcontractor as work is started on various elements of the project, an accurate projection of how many new workers will be employed is not possible. Assuming the project 1) meets our prediction of an average of 1,325 "jobs" annually and 2) is staffed entirely by new hires, the residents of the communities would be targeted to receive an average of about 400 "jobs" annually.

**Controls over training program have weaknesses.** In reviewing Appendix 12, we found the administrative controls established over the local hiring program should provide ACTA the information it will need to verify compliance with the requirement. Nonetheless, diligent contract administration will be necessary to verify the accuracy of the reported data and to follow up on any discrepancies or failure by the contractor to meet the requirement. Furthermore, in reviewing the training program controls, we observed two areas where ACTA's controls have weaknesses:

1. **Training Corridor residents.** Appendix 12 does not require the contractor to identify individual trainees. Reporting the name and address of each trainee would enable ACTA to ensure that trainees are legitimate residents of the Corridor communities, as well as reduce the opportunity for abuse. We also noted Appendix 12 does not establish a minimum residency requirement before individuals can be placed in the program, nor does it address trainees who move out of the Corridor during their training period.
2. **Distribution of training opportunities.** In its current form, the program could allow the contractor to concentrate job training in one area of the Corridor to the exclusion of other communities. Requirements are needed to ensure that training facilities are accessible to residents in each community.

### **ACTA's DBE Program**

The Surface Transportation Assistance Act of 1982 set as a goal that at least 10 percent of Federal surface transportation funds should be expended with DBEs. On March 12, 1998, ACTA's Board of Directors approved a business outreach program for the overall Alameda Corridor project. ACTA's program extends to

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all businesses, including the Mid-Corridor contractor, and establishes a goal of 22 percent DBE participation. To implement the DBE program on the Mid-Corridor, ACTA developed Appendix 11 to the Mid-Corridor contract. Appendix 11 contains a policy statement, definitions, procedures for ascertaining the eligibility of DBEs, anticipated DBE participation levels, and enforcement requirements. Under ACTA's policy, the prime contractor must ensure DBE participation on the Mid-Corridor segment.

Our review of ACTA's program found the definition of a DBE and the procedures for promoting DBE participation are in line with Federal requirements. On July 31, 1998, ACTA submitted its First Period Progress Report on DBE participation on the Alameda Corridor project to the Department of Commerce's Economic Development Administration. We noted ACTA's report showed it exceeded its 22 percent participation goal for DBEs and the Federal requirement of 10 percent: ACTA reported 23.9 percent of the value of approved invoices as of that date (\$16,954,384 of \$70,997,295) went to DBE firms. These figures represent overall participation by DBEs on all segments of the project.

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## **OBJECTIVES, SCOPE, AND METHODOLOGY**

### **OBJECTIVES**

In response to requests from Congresswoman Juanita Millender-McDonald to U.S. Secretary of Transportation Rodney Slater on May 11, 1998, and to the Office of Inspector General (OIG) on July 11, 1998, we conducted this review of the Alameda Corridor project. Specifically, we reviewed whether the Alameda Corridor Transportation Authority (ACTA) misrepresented the number of jobs that would be created; the impact of the Federal financing method, a direct loan to ACTA, on the applicability of Federal regulations; and ACTA's procedures for ensuring the Disadvantaged Business Enterprise (DBE) program and the job training program comply with applicable Federal regulations.

### **SCOPE**

The review focused only on the issues that were the subject of Congresswoman Millender-McDonald's request. Furthermore, the review was limited to examining the procedures and processes in place related to the job development and training and Disadvantaged Business Enterprise programs.

### **METHODOLOGY**

The review included visits in Washington, DC to the headquarters offices of the Federal Highway Administration (FHWA) and concerned congressional offices. In California, we visited ACTA, community groups that are potential participants in the project, and state and local officials involved in project oversight. To answer the Congresswoman's concerns, we examined the projections of the number of jobs that will be created and ACTA's efforts related to implementation of a DBE program and a job development and training program. Specifically, we:

1. Identified the Federal rules and regulations that are applicable to the Mid-Corridor contract owing to the unique method of financing that was developed for that segment of the Alameda Corridor project. After determining many regulations were rendered inapplicable by the method of financing, which precluded FHWA oversight, we focused on examining ACTA's processes.
2. Identified and reviewed FHWA's and ACTA's procedures and processes for ensuring that contracting for the Alameda Corridor project complies with applicable Federal regulations, specifically we:
  - a) reviewed the implementation of a job training and employment program, including the job projections;



- b) identified the applicability of, and efforts to ensure compliance with, Federal rules relevant to the employment and training program; and
- c) identified the DBE requirements applicable to the Mid-Corridor segment of the project and FHWA's and ACTA's processes and procedures for ensuring these requirements are followed.

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**ORGANIZATIONS CONTACTED**

During the course of our review, we contacted the following organizations and individuals:

**Elected Officials:**

The Honorable Juanita Millender-McDonald, (Washington, DC; Torrance, CA)

The Offices of the Honorable Jane Harman (Washington, DC)

The Offices of the Honorable Lucille Roybal-Allard (Washington, DC)

The Offices of the Honorable Esteban E. Torres (Washington, DC)

The Honorable Tom Hayden (Los Angeles, CA office)

The Honorable Betty Karnette (Long Beach, CA office)

The Honorable Quentin L. Kopp

The Honorable Yvonne Brathwaite Burke, Chair, Los Angeles County Board of Supervisors; Supervisor, 2nd District

Mr. Daryl W. Sweeney, Councilman, Carson, CA

Note: At the request of Congresswoman Millender-McDonald, we also contacted the offices of other elected officials in Carson, Compton, and Lynwood. The above includes only those officials who returned our calls.

**Federal Organizations**

Federal Highway Administration, Office of Budget and Finance – Federal-aid Financial Management Division; Office of Chief Counsel; Office of Policy Development - Transportation Studies Division

Federal Railroad Administration, Office of Budget

U.S. Bureau of Labor Statistics, Industry Employment Projections Division

**Local Government, Community Based Organizations, and Individuals:**

Concerned Citizen's Alliance of Southern California, Mr. D.C. Chavez, President

Department of Employment and Training Services, City of Compton, Ms. Vera Dorsey, Director

Greater Bethany Economic Development Corporation, Mr. Robert E. Rubin, Executive Director; Ms. Benetta Johnson, Community Organizer

Hub Cities Consortium, Mr. Jeff Kennelly, Executive Director

National Association for the Advancement of Colored People (NAACP), Mr. James T. Wilson, President, Watts Branch

South Bay Coalition for Corridor Jobs, Mr. David Esparza

Women in Non-Traditional Employment Roles (WINTER), Ms. Ebony Shakoor-Akbar, Executive Director

Young Black Contractor's Association, Mr. Drexell Muhhamad

Ms. Aurbendale "Della" Ward, community activist

**The Alameda Corridor Transportation Authority**

Mr. James C. Hankla, Chief Executive Officer

Mr. Gill V. Hicks, General Manager

Ms. Veronica Soto, Public Affairs

*Alameda Corridor Business Outreach Program*, Ms. Karen Blackwell

*Alameda Corridor Engineering Team*, Mr. Duane Kenagy

**Private Organizations involved in the Alameda Corridor project**

*Associated General Contractors of California*, Mr. John Hakel, Executive Director, and Mr. James Prunty, Manager, Los Angeles District Manager

*Global Stratagem Group*, David Cobb, Principal

*Gibbs, Giden, Locher & Turner, LLP.* Ms. Barbara Gadbois, Attorney-at-law

*Los Angeles/Orange Counties Building and Construction Trades Council,*  
Mr. Richard Slawson, Executive Secretary

*Manatt, Phelps, Phillips:* Ms. June Langston DeHart, Managing Partner  
(Washington, DC)

*Project for Small Business Economic Development, Inc.,* Ms. Sheryl Monaghan,  
Director (U.S. DOT Representative)