

February 25, 2019

Joel Sacks, Director
Department of Labor & Industries
7273 Linderson Way SW
Tumwater, WA 98501

RE: prevailing wage emergency rulemaking petition

Dear Mr. Sacks:

As you are aware, cities are experiencing double and tripling of rate increases for landscape laborers as a result of the Department's implementation of SSB 5493. Cities across the state are concerned with the size of this increase and believe that emergency action is warranted to address the unintended consequences of the new rate for landscape construction. We respectfully request that the department undertake emergency rulemaking to establish a new scope of work specific to landscape maintenance that is separate and unique from landscape construction.

Cities across our state are preparing for critical seasonal landscape maintenance work. This includes preparing parks, athletic fields, trails and other recreational facilities for the spring and summer season. Additionally, this is the time when critical vegetation maintenance is needed on stormwater facilities like retention ponds. This is also a time when we are responding to storm related clean-up to remove dangerous debris from our public spaces.

Without revisiting the cost of prevailing wage for landscape maintenance, much of this work will be unaffordable for cities. As a result, critical maintenance may be limited or not occur at all. The result will be detrimental for public health and safety. Lack of adequate maintenance will result in unsafe facilities creating risks to the public and liability concerns for cities.

Thank you for your consideration and we look forward to working with the Department through the rulemaking process.

Sincerely,



Peter B. King
Chief Executive Officer

cc: Representative Mike Sells, Chair, House Labor and Workforce Development Committee
Senator Karen Kaiser, Chair, Senate Labor and Commerce Committee
Candice Bock, Director of Government Relations