



GENERAL COUNSEL MEMORANDUM

To: ALRB Board Members

CC: Santiago Avila-Gomez, Executive Secretary

From: Julia Montgomery, General Counsel

Re: Proposal to Restructure and Rename ALRB Regions and Change Case Numbering System

Date: September 21, 2023

This memorandum proposes to restructure the ALRB's regions so that the Santa Rosa office is part of the Visalia Region instead of the Salinas region, and to change our region names and case numbering system. As explained below, restructuring the regions will balance out the supervisorial responsibilities of the Regional Directors (RDs) and revising the naming conventions will reduce confusion and allow for easier case tracking.

For the past seven years, the ALRB has maintained two regional hub offices and three subregional offices. The "Salinas Region" includes offices located in Salinas, Oxnard and Santa Rosa. The "Visalia Region" includes offices located in Visalia and Indio. Each region has an RD who manages the offices and staff in each of their region's locations. There is currently an imbalance in the number of attorneys that each RD supervises as the Salinas RD supervises more than twice the number of attorneys than does the Visalia RD. ALRB's HR Manager has recommended that the General Counsel program even out the attorney supervision between the RDs to balance the workload and facilitate better oversight. Moving the Santa Rosa office to the Visalia Region would correct this imbalance as the chart below illustrates:

	Current SAL Region	Current VIS Region	Proposed Region 1: Salinas & Oxnard	Proposed Region 2: Santa Rosa, Visalia & Indio
Attorneys	10	4	7	7
FE III	1	1	1	1
FE I & II	8	7	7	8
Support Staff	4	3	3	4

The General Counsel program leadership team considered proposing that Oxnard instead of Santa Rosa be moved to the Visalia Region. However, we concluded that it is a better option to include Santa Rosa together with Visalia and Indio so that we keep offices together in a region that handle cases with similar agricultural commodities. For example, most cases handled by the Salinas and Oxnard offices involve the strawberry industry. There has also been an influx of strawberry cases out of the Santa Maria area, which has also been historically handled by the Salinas Region. The Santa Rosa office on the other hand, covers areas in which the commodities of wine grapes and dairies are more prevalent – commodities which overlap with those found in the Central Valley. Keeping offices within a region where the commodities are similar will make the best use of our staff's expertise and will assist in communication with stakeholders.¹ In addition, the GC program has two Visalia Region staff members working out of the Sacramento office to better cover the northern Central Valley and inland areas north of Sacramento. Including Santa Rosa in their same region will facilitate better collaboration among staff located in the Sacramento and Santa Rosa offices.

This memorandum also proposes to rename our regions and change our case numbering to drop the office location suffix. Naming regions after a particular geographic area alone leads to confusion as we handle cases throughout the state. Moreover, designating our regions by number rather than office location will also be consistent with many other government entities, including the NLRB.² For this reason, we propose changing the Salinas Region to "Region 1" and the Visalia Region to "Region 2." Moreover, the ALRB's case numbering system has also been by region with the suffix "SAL" or "VIS." Each region thus has overlapping case numbers, save for the suffix at the end. This is also unnecessarily confusing as there is more than one case that will have the same number, such as "2023-CE-001" if a party omits the suffix of "SAL" or "VIS" at the end. By simply structuring our cases to be numbered sequentially regardless of the region in which they are filed, it will be easier for all to track the number of cases filed each year and reduce confusion. With our case management system eCourt, we already track the number of cases filed out of each office, so this data is easy to obtain upon request. For this reason, we propose that the region names and case numbering system change beginning on January 1, 2024.

For the foregoing reasons, I recommend that the Board take action to restructure ALRB's regions as described above, and to change the region names and case numbering system.

¹ Staff develop an expertise in particular commodities based on the cases they handle. For example, the Oxnard and Salinas staff have developed expertise in matters involving the strawberry industry. We also tend to see some of the same workers moving around the state within the same commodity, such as workers who start out harvesting strawberries in Oxnard and then move to Santa Maria and Salinas, which have later harvests. Employers in a particular commodity are also more likely to share the same attorneys.

² See: <https://www.nlrb.gov/about-nlrb/who-we-are/regional-offices>