

# Federal Prevailing Rate Advisory Committee

## 644th FPRAC

Janice R. Lachance, Chair, Presiding

Thursday, February 16, 2023

Virtual Meeting via Microsoft Teams

Office of Personnel Management

Washington, D.C. 20415

### Attendance:

#### Members/Alternates:

##### Management Members:

Mark Allen, OPM  
Nancy Anderson Speight, DoD  
Sonja Loss, Navy  
Mandy Laughlin, Army

##### Labor Members:

Jacqueline Simon, AFGE  
Richard Loeb, AFGE  
Carisa Carmack, NAGE

#### Staff Specialists and Visitors:

Brenda Roberts, Designated Federal Officer, OPM  
Ana Paunoiu, OPM  
Samantha Bono, OPM  
Christopher Lynch, DoD  
Karl Fendt, DoD  
Gary Kistner, DoD  
JeeYoung Kang, Army  
Brandon Anderson, Navy  
Sheila Willis, VA  
Keyonna Butler, VA  
Dale Troll, MTD  
Paul O'Connor, MTD  
Dan Pullium, Naval Support Activity Monterey  
Peter Wahnon, NAGE

Recording Secretary:

Mike Eicher, OPM

[Transcript prepared from digital audio produced by FPRAC.]

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## I. Opening Announcements and Introductions

Chair Lachance: It's ten o'clock so let's get started. I want to welcome everyone to the 644th meeting of the Federal Prevailing Rate Advisory Committee. It is February 16th, and it's now 10 a.m.

As we have done for the last year or so, this meeting is being held virtually, and it is being recorded. A verbatim transcript will be provided to all the members of the committee for your review at the next meeting.

I am Janice Lachance, and I chair this committee, and I want to welcome everyone to the meeting. We should start with introductions so that we can get a sense of who is here and get the attendees on the record.

I'm going to start with the Labor members. As I call out your organizations, if you could tell us who's here, that would be helpful for our recordkeeping.

Metal Trades?

[No audible response.]

Chair Lachance: Okay. We can circle back around, see if they join a little later.

Mr. Allen: I think Dale is on. Are you on, Dale?

[No audible response.]

Chair Lachance: He may have—oh, I see him now. Well, we can come back.

AFGE?

Ms. Simon: This is Jacque Simon

Chair Lachance: Great.

Mr. Loeb: And it's Richard Loeb. I am here as well. Hi.

Chair Lachance: Great. NAGE?

Ms. Carmack: Carisa Carmack. I'm here.

Chair Lachance: Hi, Carisa. ACT?

[No audible response.]

Chair Lachance: All right. Moving to the Management side. OPM?

Mr. Allen: Mark Allen for the OPM staff.

Chair Lachance: DoD?

Mr. Lynch: Christopher Lynch. Nancy Speight is going to be a little late. She'll join us about 15, 20 minutes from now.

Chair Lachance: That's great.

Mr. Lynch: And we also are—yeah. We'll announce the guests once we're done with the members.

Chair Lachance: Army?

Ms. Laughlin: Good morning. This is Mandy Laughlin. I have JeeYoung Kang on the line as well.

Chair Lachance: Great. Thank you. Navy?

Mr. Anderson: This is Brandon Anderson.

Chair Lachance: Hi, Brandon.

Ms. Loss: Good morning. This is Sonja Loss, and I have Brandon Anderson with me.

Chair Lachance: Terrific. VA?

Ms. Willis: Good morning. This is Sheila Willis, and I also have Keyonna Butler with us from VA. Ann Vicks will not be in attendance this morning. Good to see everyone.

Chair Lachance: And I see that Brenda Roberts is here, and she is the Designated Federal Official under the Federal Advisory Committee Act. Thank you, Brenda, for joining us.

Are there staff members who are here?

Ms. Paunoiu: Good morning. Ana Paunoiu, OPM.

Chair Lachance: Great.

Mr. Eicher: Mike Eicher, OPM.

Ms. Bono: And Samantha Bono, OPM.

Chair Lachance: Good. Let me circle back to some of those who weren't here the first time around. Metal Trades?

[No audible response.]

Chair Lachance: Dale may be having connection issues. And ACT?

Ms. Paunoiu: Metal Trades is online. I can see Dale Troll.

Chair Lachance: Maybe he's having trouble connecting on audio.

And are there any guests beyond our members who are here today?

Mr. Fendt: This is Karl Fendt from the Wage and Salary team. Gary Kistner is also on as well as some various wage SMEs that we shared with Ana earlier.

Chair Lachance: Great. Thank you so much, and thanks for everybody, to everyone too for being here with us. Anyone else?

LCDR Pullium: Yes. This is Lieutenant Commander Dan Pullium.

Chair Lachance: And who are you with, sir?

Lcdr Pullium: So I'm the Public Works officer for Naval Support Activity, Monterey.

Chair Lachance: Okay, great. Thank you.

Ms. Carmack: He's with NAGE, Janice.

Chair Lachance: Great. Thank you. Anyone else?

Ms. Paunoiu: We only have one phone number that I don't recognize. It's a 619 area code. If you could please identify yourself?

Mr. Anderson: This is Brandon Anderson. That's my number. I dialed in, in case I get cut out on Teams.

Ms. Paunoiu: Thank you.

Chair Lachance: Great. I like that. A belt and suspenders, just in case. That's perfect.

Thank you all for being here and for participating in this. I would like to note that FPRAC did hold its seventh working group meeting to look at potential recommendations for reforms to the Federal Wage System on January 15th, and we will have another one immediately following this public meeting.

We also have an announcement on the agenda this morning, an article submitted by AFGE—thank you for that—regarding the Fort Hood Local Wage Survey Committee hearing, which noted that it was a first step in addressing federal wages in central Texas, and that is presented as FPRAC document 644-AFGE-1.

Jacque, do you want to speak to this—or Rich?

Ms. Simon: Did you guys distribute the document?

Chair Lachance: Yes.

Ms. Simon: I need to look for it.

Chair Lachance: You're talking about the article?

Ms. Simon: Yeah.

Chair Lachance: It was in the package.

Mr. Allen: Yeah. Ana sent this out last week along with the other public meeting information pieces.

Chair Lachance: We try to be a week ahead, so maybe look last Thursday? Last Thursday maybe, and it would have been from Ana. It would have been an email from Ana, if that makes it easier for you to search.

Mr. Allen: If it's okay, I could just describe what the article is about.

Ms. Simon: No, I found it. I'm just looking at it right now. I was actually there a couple of weeks ago, and the concern was that they're being treated as part of the Waco area as opposed to Austin. Whereas, they've really become more of a suburb of Austin. I don't think that's in this article, but that's what I heard.

Mr. Allen: What normally happens—and this is what the article is referring to—is before DoD conducts a local wage survey, a few weeks before they start the survey, they hold a public hearing. And I believe the hearing—according to the article, the public hearing was held at Fort Hood, as it normally would be, and there were concerns expressed about recruitment and retention problems at Fort Hood—

Ms. Simon: Yes.

Mr. Allen: —which are being driven by employees choosing to go work elsewhere.

Ms. Simon: Well, they're being driven by the fact that there's a sort of explosion of growth in the Austin metropolitan area, of which Fort Hood and Lampasas are a part, and that's what's going on, yet both GS and wage grade at Fort Hood are treated as if they're part of the Waco labor market. And in fact, they're really much more connected to Austin.

I mean, I see that that's not stated in this article. I'm looking at the article.

Chair Lachance: I think there's a quote from the Fort Hood commander, Jacque, who says, "When we lose people and they leave here to go to work somewhere else"—

[Simultaneous speaking.]

Ms. Simon: [Unclear.]

Chair Lachance: —"They don't go to Waco. They move to College Station. They go to Austin."

Ms. Simon: Right. Yeah. I mean, think that's really the issue. The issue is the explosion of costs and—cost of living and wages and salaries in the Austin area, and Fort Hood is very much a part of that. It's closer to—it's closer to Austin than it is to Waco.

Chair Lachance: [Unclear]—next step.

Mr. Allen: What I would suggest with this, since Austin is a GS locality pay area, that as part of the working group, we do an analysis of the Austin wage area—or Austin and Waco wage areas and see how connected they are.

[Simultaneous speaking.]

Ms. Simon: [Unclear.]

Mr. Allen: We can either do that as part of the working group or separately. It doesn't really matter when we do that, to me.

Ms. Simon: Okay. I mean, Killeen and Lampasas are the towns that are relevant here, and they are much more connected to Austin. But sure, that sounds like a good idea.

Chair Lachance: So we'll put that on the agenda going forward and ask that the OPM staff take a look at this, and thank you for bringing it to our attention. And we can

see what the results look like.

DoD is the affected agency here. Does that make sense to you all to proceed that way?

Mr. Lynch: No, it makes sense we should study this further.

Chair Lachance: That's great. Good. Well, thank you. The article was great. Thank you for sending it to us, Jacque, and things like this really help to elevate some of the issues that we have to deal with in the system, so thank you for that.

## II. Review of the Minutes of the 642nd Meeting

Chair Lachance: So now, if we could, let's move to review the transcript of the last public meeting that was held on January 15th. Are there any changes to the transcript that anyone wants to bring to our attention?

[No audible response.]

Chair Lachance: Everybody gets so quiet at this point in the agenda, but if not, is there any objection to adopting the transcript of the last meeting?

Mr. Allen: No objection.

Chair Lachance: Great. Hearing none, we'll go ahead and adopt it. Thank you all very much for taking a look at it.

### III. Old Business

- a. Letter from the American Federation of Government Employees, Dated September 6, 2018, Requesting FPRAC Review a Proposal to Not Allow Federal Wage System Wage Area Boundaries to Split General Schedule Locality Pay Areas and a Proposal to Redefine Monroe County, PA, from the Scranton-Wilkes-Barre, PA, Wage Area to the New York, NY, Wage Area, 620-AFGE-1
- Letter from the American Federation of Government Employees, Dated March 22, 2022, Requesting FPRAC Review a Proposal to Limit all Non-Rest of U.S. General Schedule Locality Pay Areas to no more than one Federal Wage System Wage Area and a Proposal to Redefine Monroe County, PA, from the Scranton-Wilkes-Barre, PA, Wage Area to the New York, NY, Wage Area, 637-AFGE-1
  - 2022 Update to Review of Monroe County, Pennsylvania, 638-OPM-2
  - Estimated 5-Year Cost Projection of Application of FPRAC Document 620-AFGE-1, 622-OPM-1
  - Paper Pay Disparity at Tobyhanna Army Depot by Joseph P. Lynott Sr., 623-OC-2
  - Email Message from Steven R. Kester in Support of the Proposal to Move Monroe County, PA, to the New York, NY, Wage Area, 623-OC-3
  - Letters from Steven R. Kester Regarding the Pay Disparity Between FWS and GS Employees at Tobyhanna Army Depot, 627-OC-1 and 633-OC-1, 637-OC-2, 637-OC-3, 640-OC-1

- Employment Distribution at Tobyhanna Army Depot, 634-OPM-1, and 2022 Update to GS and FWS Employment Distribution at Tobyhanna Army Depot, 638-OPM-3
- Market Rates vs Schedule Rates for Electronics Mechanics (Series 2604) Tobyhanna Army Depot, 634-OPM-2, and 2022 to Market Rates vs Schedule Rates, 637-OPM-4

b. Letter from the American Federation of Government Employees, Dated September 3, 2019, Requesting FPRAC Recommend Redefining San Joaquin County, CA, from the Stockton, CA, Wage Area to the San Francisco, CA, Wage Area, 627-AFGE-1

- Review of San Joaquin County, California, 629-MGT-1

c. Letter from the National Association of Government Employees, Dated September 25, 2019, Requesting FPRAC Reexamine the Placement of Wage Grade Employees Working in the Salinas-Monterey, CA, Wage Area, 628-NAGE-1

- Review of the Salinas-Monterey, California, Federal Wage System Wage Area, 629-MGT-2
- Request for the abolishment of the Monterey/Salinas wage survey area, 632-NAGE-1 and 636-NAGE-1

d. Letter from the Association of Civilian Technicians, Dated November 9, 2019, Requesting FPRAC Consider Moving the Puerto Rico Wage Area into the Special Appropriated Fund Schedule for U.S. Insular Areas, 629-ACT-1

- 2016 Study by NOAA Describing the Ocean Economies of the U.S. Virgin Islands and Puerto Rico, 629-ACT-2
- Review of the Puerto Rico Federal Wage System Wage Area, 631-MGT-1
- Puerto Rico Wage Grade Adjustment 2020, 631-ACT-1
- Letter from the Association of Civilian Technicians Requesting FPRAC Delay the Vote on the ACT Puerto Rico Proposal until April/May 2021, 636-ACT-1

e. Email from the American Federation of Government Employees, Dated May 23, 2022, Requesting FPRAC Review a Proposal to Unify the WG schedules at the Federal Correctional Complex Butner, 639-AFGE-1

- Southeastern North Carolina (RUS) Wage Schedule, 639-AFGE-2
- Central North Carolina Wage Schedule, 639-AFGE-3
- Fiscal Year 2020 Prevailing Rate Pay Adjustments, 639-AFGE-4
- Central North Carolina Special Wage Schedule A099, 639-AFGE-5
- Richmond, North Carolina Special Wage Schedule A099, 639-AFGE-6
- AK78 Final Rule General Schedule Locality Pay Areas published at *70 Federal Register* 74996 on December 19, 2005, 639-AFGE-7

- Email from Federal Correctional Complex Butner FWS employees requesting an update on FPRAC Review of an AFGE Proposal to Unite the WG schedules at the Federal Correctional Complex Butner, 643-OC-2
  - Research Paper, 634-OC-3
  - LEO Pay Ranks, 634-OC-4
  - North Carolina Map, 634-OC-5
  - 2022 GS Locality Pay Rates, 634-OC-6
- f. DRAFT, Prevailing Rate Advisory Committee Annual Summary, 2022, 643-OC-1
- g. Email message from Ms. Kathleen Pagano regarding pay disparities at the Naval Facilities Engineering Systems Command Mid-Atlantic, Public Works Department, 643-OC-7
- Letter from Sen. Elizabeth Warren (D-MA), Sen. Edward J. Markey (D-MA), Sen. Jack Reed (D-RI), and Sen. Sheldon Whitehouse (D-RI) to OPM in support of the 2010 Federal Prevailing Rate Advisory Committee (FPRAC) recommendation to consolidate Federal Wage System (FWS) wage areas that lie within General Schedule (GS) locality pay areas, Dated February 19, 2020, 643-OC-8

Chair Lachance: Now, there are still items under Old Business on the agenda that stay on the agenda while the working group considers their options and the possibility of developing recommendations for reforming the FWS. So rather than reading through all of the Old Business items, is it still the Committee's consensus that action on these items should be deferred for the next few months while the working

group is meeting, or does anyone want to say anything about any of the items in particular this morning?

Ms. Carmack: Janice, I think Mr. Pullium is here to speak about the Monterey-Salinas one. I think we're still in agreement that we can talk about it more in the working group. My understanding is we'll be doing an analysis of that area soon, but he did have some information that he wanted to provide to the Committee. So I don't know if you want to go forward with that now or if we want to wait.

Chair Lachance: That's great. Why don't we go ahead. Thank you for introducing the issue, Carisa. Do you want to go ahead and address the Committee?

LCDR Pullium: Thank you, Carisa.

[Simultaneous speaking.]

Ms. Carmack: [Unclear.]

LCDR Pullium: I have a slide deck.

Ms. Carmack: Yeah. That's what I was missing. No, Dan, that's exactly what I was going to say. I was going to say that Ana said she could pull up the slide deck that he had created so that—or Samantha. All right. Thank you.

Chair Lachance: There it is.

LCDR Pullium: Thank you. Yep. I have visual. Thank you.

Good morning, everyone. My name is Dan Pullium. As I had said before, I'm a lieutenant commander in the United States Navy. Specifically, I'm the Public Works Officer at Naval Support Activity Monterey, which is probably best known as the home

for Naval Postgraduate School.

And first of all, I just want to thank this Committee for agreeing to hear this analysis that I'm about to present. I've entitled this presentation, "Analysis Supporting the Need for a Wage Area Reassessment for Monterey County."

So as I stated, I'm the Public Works Officer here at Naval Support Activity Monterey. In this role I lead a team of approximately 90 civilian federal employees, about half of which are white-collar GS employees, and the other half are blue-collar tradesmen falling under the Federal Wage System.

I've been in this position for about six months now, and in that time, I've come to really understand the pay divide that separates my GS and FWS employees. And as I'm sure this Committee is already well aware, this is a constant point of frustration within my team. It's been negatively impacting retention, recruitment, organizational climate, and ultimately subjects half of my workforce to disproportionate financial hardship.

I have a background in data science. Specifically, I have a master's degree in operations research. So naturally, when representatives from my blue-collar workforce came to me with this issue, I could see their passion and understand their plight, but I wanted to take a hard look at—an objective look to see what the actual data tells us. And specifically, I looked at how does our local area compare with the rest of the county and how does our area compare to the adjacent areas.

And early into this analysis, it became very clear to me that what they were saying and fighting for, trying to articulate for all these years, is true. The current wage area simply does not provide a fair and adequate representation for them. So the

analysis that I'll get into here takes a unique and objective look from what's been done in the past for Monterey County using official government data, most of which was obtained from the U.S. Census Bureau.

So here's the bottom line up-front side. So bottom line, the current FWS wage area determination procedures have failed the FWS employees located here in North Monterey County. This analysis will demonstrate that North Monterey County shares very little in common with South Monterey County, and in fact, it shares much more in common with Santa Cruz County, which is immediately adjacent into the north. And Santa Cruz County is actually part of the San Francisco wage area.

The Salinas-Monterey wage area, which is the entire county of Monterey, does not account for the vast socioeconomic divide that's observed within the boundaries of Monterey County, which I'll get into in the next several slides, all of which were developed using official government data, as I mentioned.

I'll conclude by presenting two viable courses of action that could immediately address this issue, the first of which proposes bringing Santa Cruz County down into the same wage area as Monterey County and the second of which proposes splitting Monterey County and combining each area, North Monterey County with the adjacent area to the North and South Monterey County with the adjacent area to the south. Each of these have their own variants, but we'll get into that in the later slide.

So next slide. All right. So this slide presents a very broad overview of Monterey County. The key takeaway here is that Monterey County is quite large. In fact, it's the 17th largest county out of California's 58 counties. The coastal region of the county is

defined by its rugged coastline, scenic beaches, while the inland region is characterized by rolling hills and fertile agricultural land.

There are two distinct regions in Monterey County that employ FWS employees. I've labeled them here, and I call—I refer to them in this analysis as "North Monterey County" and "South Monterey County." So North Monterey County has FWS employees in Monterey, Fort Ord, and Salinas, which you can see at the top, and then South Monterey County has FWS employees at Camp Roberts and Fort Hunter Liggett, both of which are military training facilities surrounded by open grazing and agricultural lands, with some rural development.

As far as numbers of —oh, can you go back to the slide? As far as numbers of FWS employees in each of these areas, the latest data that I had was from 2015, which showed that North Monterey County had 80 FWS employees, 49 in Monterey, 23 in Fort Ord, and 8 in Salinas. And according to the same data, South Monterey County had 163 FWS employees with 75 in Fort Hunter Liggett and 88 in Camp Roberts.

And then, lastly, I just want to add that about 70 to a hundred miles separate FWS employment locations in North Monterey County from those in South Monterey County, and for some perspective, these are roughly the same distances between Monterey and Silicon Valley or San Jose and between Monterey and San Francisco area proper, which I'd like to point out that my GS employees are lumped into the San Francisco locality rate, which I believe is the highest in the country.

Next slide. So now I'll get into some of the analysis. So this slide focuses on population density. So on the left is Monterey County. You'll see that North Monterey

County has a much larger population density than that of South Monterey County. I apologize for my city labels. I think I shifted the picture up a little bit. So they're shifted. The labels on Monterey County are a little bit lower than they should be on this slide. But the key takeaway here is that portions of Monterey Bay area are nearly five times more densely populated than the rest of the county. All three of the FWS employment locations in North Monterey County are located in the most densely populated portions of the county. Whereas, the two employment locations in South Monterey County are in very low-populated areas.

And on the right, I have Santa Cruz County, which is adjacent and immediately to the north of Monterey County. This picture doesn't accurately show the size scale of Monterey County compared to Santa Cruz, which is Santa Cruz County is much smaller. But what you'll see here is a strong similarity between the two counties in terms of population density around the Monterey Bay coastal areas. I'll point out the scales are slightly different, but they aren't wildly different to throw off that conclusion.

Next slide. All right. So this slide was developed using Census Bureau data, and it depicts the educational attainment of Monterey and Santa Cruz County. Specifically, this map depicts the number of individuals 25 years and older with a bachelor's degree or higher. Here, it's clear to see that North Monterey County has a much higher level of educational attainment than that of South Monterey County, and there are strong similarities between the educational attainment in North Monterey County and Santa Cruz County, which is shown in the north. It should also be noted that educational attainment is a socioeconomic factor that's often correlated with higher costs of living, and it's often correlated with a higher mean household income, which I'll get into in the

next slide.

As I just mentioned, this map depicts the mean household income for Monterey and Santa Cruz Counties. You'll see that North Monterey County clearly has a higher mean household income than that of South Monterey County. Likewise, similarities between the mean household income of North Monterey County and Santa Cruz County can be seen here as well.

Next slide. All right. So this slide depicts the median home values in Monterey and Santa Cruz County. Again, you'll see the same pattern, with North Monterey County being much, much different than South Monterey County, with home values one and a half to three times higher in North Monterey County and much more closely aligned to what in Santa Cruz County.

Next slide. Again, similar to the previous slide, the map shows monthly housing costs for Monterey and Santa Cruz County. Again, you'll see the same pattern being drastically—with Monterey County being drastically different than South Monterey County, with North Monterey County seeing monthly housing costs two and a half to three times higher than South Monterey County. Again, very close alignment with Santa Cruz.

Next slide. All right. So this slide shifts gears a little bit and takes a look at the Department of Defense's established basic allowance for housing rates, or BAH rates, which are determined across the country at the zip code level. It's understood that BAH is used only by the DoD. It's not a factor used by OPM in defining the wage area. However, I simply present this data here to point out the fact that another federal entity

recognizes a very clear divide between North Monterey County and South Monterey County in terms of cost of living. You'll see that's separated by the blue and Monterey County split with the blue and the red there. The map depicts average BAH rate with dependence at across all ranks relative to Monterey County. You'll see that there's about a 16.4 percent drop in BAH for South Monterey County when compared to North Monterey County. It's also interesting to note that DoD has established the BAH Santa Cruz County to the north as the same as that in Monterey County.

Next slide. So these final maps I present are the depictions of California's 20th and 19th Congressional District maps. On the left, we have California's 20th Congressional District prior to redistricting in 2022, and this district is encompassed by much of the Central Coast region, all of Monterey County, and San Benito County to east, as well as portions of other adjacent counties. And on the right, you'll see the current depiction of California's new 19th District after redistricting in 2022, and you'll see the district specifically carves out the coastal region. And I want to point out that one of the aims of congressional redistricting is to keep communities with common interests, characteristics together in a single district known as "communities of interest," which helps ensure that these communities are represented by a single elected official familiar with and responsive to their needs.

The two main FWS employment regions within Monterey County are now clearly located within two separate Congressional Districts. And again, while it's understood that this is not a factor used by OPM to determine wage areas, it's yet another key difference setting the two regions apart. You'll see that Santa Cruz is included with Monterey as well as the other coastal regions down throughout Monterey County.

All right. So the next couple of slides, I present possible solutions to this problem. So first off, I have COA, Course of Action No. 1, which is to add Santa Cruz County to the Salinas-Monterey wage area, and this would be implemented simply by what it said, add Santa Cruz County to the Salinas-Monterey wage area, which is currently only comprised of Monterey County.

Justification for this is that North Monterey County and Santa Cruz County share striking similarities across many socioeconomic factors, as shown in this analysis, and this option would also provide a larger sampling pool of surveyable businesses for the prevailing wage surveys, which we have trouble getting enough survey respondents here in North Monterey County.

One thing not mentioned thus far is that the City of Santa Cruz and Monterey share many economic similarities. Monterey and Santa Cruz are very close in proximity. They have similar characteristics. They're both historic, scenic coastal communities with economies that are deeply rooted in tourism as well as a strong presence of academic institutions. Santa Cruz has UC Santa Cruz. Whereas, Monterey has Naval Postgraduate School, Defense Language Institute, Middlebury Institute of International Studies, as well as the Cal State University Monterey Bay.

One potential drawback to this COA is that it would likely result in wages increasing for all of Monterey County, which this analysis has shown that South Monterey County may not—increasing wages for South Monterey County might not be supported by data, which brings us to COA No. 2 on the next slide, which addresses this.

COA No. 2 is to divide Monterey County and combine with the adjacent wage areas implemented by adding North Monterey County, so the City of Monterey, Fort Ord, and Salinas to the San Francisco wage area and add South Monterey County to the Santa Barbara wage area to the south. The justification for this would be that Santa Cruz County is included in San Francisco wage area, and North Monterey County is very similar to Santa Cruz County across many relevant factors as demonstrated throughout this analysis.

Likewise, South Monterey County is similar to the adjacent counties to the south, and this COA is also justified by data due to the fact that if you view North Monterey County as a separate area, there are only about 80 FWS employees in North Monterey County, which doesn't meet the minimum of a hundred—

Somebody's trying to say something?

[No audible response.]

LCDR Pullium: Okay. I'll continue.

Chair Lachance: Please go ahead.

LCDR Pullium: Okay. One potential drawback for this is that it would require the subdivision of a county which, upon my initial examination, it does not seem to be a typical OPM practice.

However, if you go to the next slide, I have potential rebuttal to this. It's that policy guidelines in 5 CFR specifically state that counties are not typically divided except in unusual circumstances and as an exception to the criteria, which I believe the

analysis presented today helps demonstrate that there is an unusual circumstance in Monterey County that warrants the subdivision of this county.

So next slide. So going back to the bottom line I stated up front, hopefully this analysis is compelling and convincing you that there are—that the current wage area determination procedures have failed, improperly representing FWS employees, North Monterey County, specifically by failing to recognize or account for the vast socioeconomic divide observed within this large county. I presented two viable courses of action supported by data.

So if you go to the next slide. In conclusion, I respectfully ask members of this Committee to recommend OPM that they implement one of the two COAs presented today and listed here. I understand there's a working group that's charged with looking into similar wage disparity matters, but frankly, employees— my employees have waited long enough, and the data clearly supports that either of these two COAs are justifiable and would help provide them the proper wage area representation that they deserve.

I want to thank everyone for their time and attention, and I'm standing by for any questions.

Chair Lachance: That's great. Thank you very much. The floor is open. Questions or comments?

Mr. O'Connor: That was a very comprehensive presentation. Thank you very much for that.

My question is, how does this look if—does one of your two scenarios equalize the Federal Wage System area with the GS area, or does it just move the lines in the

FWS wage areas?

LCDR Pullium: I can't speak exactly to the GS wage areas. I didn't take a look at exactly which counties were comprised of that, but I do know it would be much more in alignment.

One thing that I failed to mention here is that the immediate county to the east, which is San Benito County, was very recently incorporated as part of the Salinas-Monterey wage area as, as recent as 2015 or 2016, and it has since moved into the San Francisco wage area. So there's a—if you look at the broader San Francisco wage area in county—it encompasses counties far to the north of San Francisco and extending down, wrapping kind of right around North Monterey County with San Benito kind of to the east, which goes down about halfway throughout Monterey County.

Again, I can't speak to the exact size of the GS locality, but it would be much more in alignment with what the county GS and FWA wage areas would be. It would bring much more parity to the two.

Mr. Allen: Paul asked a question on that. Monterey County is part of the San Jose-San Francisco GS locality pay area. We would be taking a look at Monterey County in addition to several other counties around the current—or outside of the current San Francisco wage area when we do an analysis of the San Francisco wage area. Not the working group meeting today, but the next working group meeting we would have, I think that would be our plan to move on to the San Francisco wage area.

I'm not sure if we could have review of the Austin wage area done at the same time, but I know we're going to start working on the San Francisco area.

The statement that OPM does not have a normal practice of splitting counties is an accurate one, and it would be problematic, say, to split Monterey County for GS employees. I think it would likewise be problematic to split it for Federal Wage System employees. But normally, what we would do is if we are going to make a decision to move a county, we would move the whole thing from one wage area to another.

Mr. O'Connor: I would recommend a third option potentially would be to make the wage area the same as the GS area, exact same boundaries.

Mr. Allen: Right.

Mr. O'Connor: See what that would look like.

Mr. Allen: Yes. We'll take a look at that.

Mr. O'Connor: But that was a really good presentation.

Mr. Allen: Yeah. I would say if he was in the job market, I would possibly offer the lieutenant commander a job at OPM to do these wait survey analyses.

Chair Lachance: I know. I actually mentioned that halfway through the presentation. We should hire him.

Thank you. That was really a terrific and very compelling presentation, and I know that the Committee will take it into account when we consider this. Is there anything else you'd like to add, or are there comments from any of the Committee members?

Mr. Allen: I have a historical observation. I believe Fort Ord used to be a very large military base when the Federal Wage System was first established, and when it

was first established, the area around San Francisco would have been a lot different back then than it is now. So I think it is a case that South Monterey County was likely not even a factor anybody was thinking about when there was a separate Monterey wage area established—or Salinas-Monterey, rather. It just happens to be the case now that I think about half of the Federal Wage System employees are in the south at Camp Roberts, and another half are in the north, and there's not a whole lot in between.

But we can take a look at the overall San Francisco wage area and neighboring wage areas to see where they would need to change to coincide with the GS locality pay area there.

There are also some factors we'll need to look at regarding locality areas to the south of Monterey to see how those function, like how far up along the coast of Los Angeles locality pay area extends. But that will be on our agenda to take a look at, at least Los Angeles and San Francisco.

I don't want to overcommit, and it takes a while for us to do these reviews.

LCDR Pullium: A unique nuance with South Monterey County is that Camp Roberts, if you go there, it is right on the border. And as I understand it, many of the employees, they don't—this may not be a factor—live in San Luis Obispo County. There's really nothing south.

One of the most compelling arguments I think would be is if somebody went and did a field survey and went to the areas and went to Camp Roberts, went to Fort Hunter Liggett, and just compare it anecdotally to Monterey. You'll see there is—you couldn't have two differing areas. And the fact that these—they're shoved together within the

same county simply because of the county lines is really a shame and a disservice to the employees here.

But like I said, to the south, a lot of the employees in Camp Roberts live out—and I think Camp Roberts even extends into San Luis Obispo County to the south, which is part of the Santa Barbara—which is a county even further to the south—wage area determination. So that's all I have there.

Chair Lachance: Thank you.

Mr. Wahnnon: I'd like to chime in.

Chair Lachance: Yes. Thank you, Mr. Wahnnon, for being here.

Mr. Wahnnon: Oh, thanks for having me. So I just wanted to point out, here at Navy Postgraduate School, the WGs, I think there's only 34 of us. We're probably outnumbered 10 to 1 by the GS employees, and to do anything other than move us into San Francisco to align with them would be incredibly unfair. I just wanted to point that out because I heard something mentioned about Los Angeles County. Los Angeles County is 280 miles away from us—or I'm sorry—the wage area. But San Francisco is only 90. So the only fair thing that FPRAC could do for the 160-something WG employees in Monterey County would be to align us with our GS counterparts.

As Lieutenant Commander fully pointed out, you guys could create a new survey area by combining us with Santa Cruz, and that way, we would be able to survey the entire Monterey Bay and create a new wage schedule. That would also be a fair thing to do because that would give us the local prevailing rates that we cannot attain because of the pay caps.

Mr. Allen: What I was referring to there with the Los Angeles locality pay area is that we'll need to take the walk at both the San Francisco area and the Los Angeles locality pay area. I was not trying to indicate that Monterey County would be a better fit with Los Angeles. It's definitely closer to San Francisco.

Chair Lachance: Anything else on this topic?

LCDR Pullium: I do have a quick question about the timeline of determination from this working group and if any changes could be enacted, how—what the timeline for these types of reassessments and redeterminations would be. Sorry if that's too early to tell or if that can't be discussed at this time.

Chair Lachance: A legitimate question.

Mr. Allen: We don't really have a timeline established. I can say that if FPRAC makes the recommendation to the Director of OPM that would require change in regulations, those changes normally take a minimum of six months. It's more likely about a year for something to change. That would depend on the scope of the changes that would be recommended, but I would say that moving a county from one wage area to another takes at least six months. And we've seen this with the change that FPRAC recommended for Shenandoah National Park, and I think we're coming pretty close to the final regulation being issued.

Actually, Ana, has that been issued yet, the final rule?

Ms. Paunoiu: No, not yet. I think it's with MSAC right now, internal clearance.

Mr. Allen: Okay. So it is probably going to be another couple of months before

that one is implemented, which is, I think, right at six months timeline after the committee makes a recommendation.

LCDR Pullium: Thank you for that.

I do want to just point out additionally, one concern that I have is if the analysis is performed in the same way—I know there's a 2001 congressional report that sparked an entire reassessment of the Monterey wage area, which really didn't dive into the sub-county level, as I did here. It would likely come to the same conclusions looking at the same criteria with commuting patterns and the other established guidelines. So I would ask that if taking a look—if maybe this approach or a framework, this could serve as a framework for how to dive deeper and address these unique nuances within Monterey County because if you step out to the county level, it all kind of averages. You got a higher area in the north, a low area in the south, and it kind of—the average—it averages out. But if you really take that microscope to Monterey County, you'll see, as I pointed out here, very distinct divides, which I don't know if the current analysis procedures that OPM or FPRAC does actually gets into that level of detail. So just wanted to add that point. Over.

Chair Lachance: Thank you. Anyone else?

[No audible response.]

Chair Lachance: I think we have a path forward. We'll get the analysis done by the OPM team and bring it to either the working group or the full committee and see what action would be recommended based on that and the excellent information you brought us today.

LCDR Pullium: Thank you very much.

Chair Lachance: Sure. Carisa, does that work for you?

Ms. Carmack: Yeah, I think that works. And then we can come up with another plan forward depending on the analysis here, because I know that these employees have been waiting a really long time. I think the Old Business is from maybe even pre-pandemic, and so, you know, definitely looking at this as part of the working group but may be dependent on the information that we get in the working group being able to determine whether we can have a similar recommendation just by this county like we did with Shenandoah so that our employees over there can get relief sooner rather than later.

Chair Lachance: That's great.

Ms. Carmack: I just want to thank Lieutenant Commander for his really extensive analysis and hard work on that and presenting that to the Committee today. We appreciate that.

LCDR Pullium: Thank you.

I just want to add, this dates back to 2001 according to my records in terms of the complaints. I do have on the last slide—you don't need to bring it up, but there's copies from the Command Climate Assessment, which is an equal opportunity—basically the health of my organization. It's one of the number one issues plaguing in my blue-collar workforce as well. So there are comments there.

And I did have a—I submitted a report. It's about 11 pages that is an analog to

this presentation as well, which has some more details. Thank you.

Chair Lachance: Thank you very much. Very thorough and very helpful. We really appreciate it.

Let's move on to the next item. At the last meeting, we introduced the calendar year 2022 annual summary, which is now listed under old business items since some members expressed a desire to take a closer look at it and perhaps submit some edits. We haven't received anything since the last meeting in the last month, but has anyone had a chance to look at it, and does anyone want to bring forward any edits at this time?

[No audible response.]

Chair Lachance: Does the Committee want a little bit more time to look at this, or are we ready to adopt the summary?

[No audible response.]

Chair Lachance: It would be great to get it off our agenda. So is there a consensus that we can go ahead and adopt this and get it in the record?

[No audible response.]

Chair Lachance: Maybe I should ask if there's objection.

Ms. Simon: Janice, this is Jacque. Can we have to the next FPRAC meeting to offer comments?

Chair Lachance: Yes, that's fine.

Ms. Simon: Okay, thanks.

Chair Lachance: That's fine. We'll keep it open till then. We'll keep it on the agenda, and if you have anything ahead of time, send it to us so that it can become part of the agenda so everybody could see it ahead of time, if that's possible.

#### IV. New Business

- a. Review of Durham and Granville Counties, NC, 644-MGT-1
- b. Letter from FWS Employees in the Salinas-Monterey FWS Wage Area Requesting FPRAC Reexamine Working in the Salinas-Monterey, CA, Wage area, 644-NAGE-1

Chair Lachance: Great. So let's turn to the Committee's New Business item. So under the document, 644-MGT-1, we have a review of the Durham and Granville Counties, North Carolina, area. Mark, do you want to introduce this proposal to the Committee?

Mr. Allen: Sure. Over the course of the last few months, we've been hearing from local employees that the federal prison and in Butner, North Carolina, which is near— I believe it's near Durham, North Carolina. So OPM staff took a look at the current status of the Raleigh and Richmond wage areas. It's something the Committee has looked at in the past.

What we have presented in FPRAC document 644-MGT-1 is a regular analysis of two counties that are associated with the prison, Durham and Granville Counties, North Carolina, and the Management members' recommendation in this package is that the Central North Carolina wage area is currently appropriately defined, and that Durham and Granville counties are also appropriately defined to that wage area.

We see with Durham County, there are 237 current Federal Wage System employees, primarily employed at the Department of Veterans Affairs Medical Center. In Granville County, they are around 126 Bureau of Prisons wage supervisors. So it is a very large institution.

We have the regulatory analysis. It's probably best just to skip to the maps.

So, Ana, please share the package on the screen. It really helps to look at the map in this instance. We had some concerns expressed about the linkage between Butner and Fort Bragg, and I think if we take a look at the map, what we'll see is that the survey area for the Central North Carolina wage areas, it's fairly expansive. When we eventually get to take a look at the GS locality pay area for Raleigh–Durham, we'll see that, that the GS area covers roughly the same terrain as the Federal Wage System survey area for the Central North Carolina wage area.

The Central North Carolina wage area is like an inverted triangle from north to south. Granville County is centrally located at the very northern end. The prison itself is in the—I believe it's in the southwestern corner of Granville County, which is right next to Durham County. So the survey area is that crosshatched area which covers Orange, Durham, Wake, Johnston, Harnett, Hoke, and Cumberland Counties, and the concern that I heard expressed from the employees of the prison was that the wage schedule for the Richmond wage area was higher than for the Central North Carolina wage area. So that's—

Ms. Simon: Well, Mark, this is Jacque. Not to interrupt, but the problem is that they're losing people constantly to the Petersburg Prison.

Mr. Allen: Right.

Ms. Simon: And they're having horrible recruitment and retention problems because within the same commuting area, people can make quite a bit more by going to Petersburg as opposed to Butner, and so it's just a constant churn. Constant. They train him to go to Butner, and then they leave for Petersburg. And it makes the Butner prison more unstable, more dangerous, and way too much mandatory overtime. The wages are too low to recruit or retain. That's the issue.

Mr. Allen: That's a valid point, Jacque. I've been hearing that for at least the last 20 years. Some federal prisons serve as training grounds for others that have higher wages or higher locality rates.

In this case, there are separate locality pay areas for Richmond and Raleigh–Durham. What we would actually need to do to place Butner on the same wage schedule as Richmond would be the opposite of what we're currently examining with not splitting GS locality pay areas. So that's not necessarily the basis for the management recommendation.

The recommendation is that the wage levels are appropriately determined for the Central North Carolina wage area, and the Management members don't see a reason to move Granville or Durham Counties out of the Central North Carolina wage area into the Richmond wage area.

What I've suggested is that the employing agencies should consider using pay flexibilities to address any recruitment and retention problems that they need to have addressed, and there is a significant pay gap on the Central North Carolina wage

schedule that could be a means for addressing the difference between what the wage supervisors at the prison are being paid and what the actual prevailing wage level is in that wage area. But right now, we don't see that it's a good idea to make any change for Granville or Durham Counties in terms of the geographic area for the definition of Central North Carolina, and it would also be troubling to do something that would actually go against what we're trying to explore with the GS locality pay areas and how they interact with the Federal Wage system wage area definitions.

Chair Lachance: Any comments on this? Questions?

[No audible response.]

Chair Lachance: Can we proceed with this conclusion on a consensus basis?

Ms. Simon: No. No.

Chair Lachance: Okay.

Ms. Simon: There is not consensus.

Chair Lachance: All right. You want a vote?

Mr. Allen: I'm not sure what we would be voting on.

Chair Lachance: I know. Well, voting to keep it as is, the motion. Does somebody want to make a motion to vote on? I don't know how we would proceed other than that. We need a motion.

Mr. Allen: I don't know if we necessarily need a motion. I would like to hear if there's a different approach that any of the members would be considering for how the Central North Carolina wage area is currently defined and what the basis of that would

be.

Ms. Simon: Where did you get your commuting data and your analysis?

Mr. Allen: The commuting data that we use are from the Census Bureau.

Ms. Simon: What year?

Mr. Allen: We use the same data for the Federal Wage System as we do for the General Schedule, and they are dated. I believe they—I think they're at least five years old. But the data are pulled from the American Community Survey, I believe, and there are supposed to be some updates after the 2020 Census. But I think those may come out this year, maybe next year.

Ms. Simon: Well, I'm just looking at page 4 of your analysis where you say the commuting patterns favor leaving them in Central North Carolina, and I just wanted to see a little more detail, how you reached that conclusion.

Chair Lachance: And just list the criteria.

Mr. Allen: Yes. To take Durham County, North Carolina, as an example— it's very common for people to live and work in the same county. In this case, 69 percent of the Durham County resident workforce lives and works in Durham County. Then we take a look at the survey area to see the percentage of the resident workforce for Durham County that commutes to the survey area definition for the Central North Carolina wage area, and that's 95 percent of the resident workforce. Twenty-six percent of the workforce commutes to work in other counties of the survey area, not including Durham County. Less than 1 percent of the Durham County resident workforce

commutes to work in the Richmond, Virginia, survey area. And that makes sense for Durham County when we look at the distance, because it's—from Durham County to Richmond is 152 miles. Durham County to Fort Pickett, which is the host installation for the Richmond survey, is about 107 miles. It's 26 miles to Raleigh.

Ms. Simon: So I guess it's all corrections officers doing that commuting.

Mr. Allen: Sorry. What was that, Jacque?

Ms. Simon: I said I guess it's corrections officers doing the commuting to Petersburg.

Mr. Allen: As you know, the Census doesn't—

Ms. Simon: I know. I realized that.

Mr. Allen: Yes.

Chair Lachance: On next steps then.

Mr. O'Connor: This is Paul O'Connor.

Chair Lachance: Yes, Paul.

Mr. O'Connor: Let me first say that I most definitely support the unions who are in the middle of this, who are actually doing the work and represent the folks that we're talking about. So if my recommendation is out of line, please let me know, but it sounds like the same situation we do across the country when we can't get enough people because of the pay rates. What about special pay rates? Is that an option?

Mr. Allen: Yes. That's a good question. The Bureau of Prisons has the ability to

work through the Department of Justice to request special wage rates or to request lifting of the manual pay limitation on the wage schedule, but they would need to show that they have recruitment/retention issues.

I know that the pay flexibilities are under consideration, and I've heard that indirectly by the Bureau of Prisons. I know they have an interest, of course, in making sure the prisons are adequately staffed.

Another option there is—and this doesn't require OPM approval—is to use recruitment and retention incentives up to a certain level. If the Bureau of Prisons wanted to go above the normal levels, they would make a request OPM to do that. But those are options that I would normally point to when it's apparent that the geographic definition of the wage area is appropriate. There are tools available, short of trying to change a wage area boundary.

Mr. O'Connor: Do we know if any of these issues, retention and whatnot, are actually issues that the Bureau of Prisons cares about? I don't mean that as crassly as it sounds, but is it one of their issues, or is it just the union on its own having to make this argument?

Mr. Allen: I have heard that the Bureau of Prisons is looking into these issues of recruitment of retention, but since the Bureau of Prisons is not a member of FPRAC, they don't really have a role in participating in the public meetings or providing OPM with a recommendation through this Committee.

But I do know they're looking at their recruitment and retention problems pretty closely, but it's really up to the Bureau of Prisons and Department of Justice to decide

on any course of action that they would want to take with the pay flexibilities. It's just not really an OPM decision on those.

Mr. Lynch: Hey, Mark, Paul, just to give you an idea, Karl did a back-of-the-envelope calculation, and it looks like we've got a pay lag in that area of about 10 percent. So if there are recruitment and retention problems in that area, we might be able to do it with special rates just by eliminating the pay lag, so just something to keep in mind.

Chair Lachance: Any other thoughts?

Mr. O'Connor: Thanks, Christopher. I have to say that that point, although I understand what you're saying, is one of the points that really frustrates me. Why do we have to reach the point where retention becomes a huge issue and dissatisfaction becomes a huge issue, when morale becomes a huge issue to make it a point to actually equal out the federal employees' pay to the local survey data? That just drives me crazy. It makes my head want to blow up. That's an opinion.

Mr. Allen: I think the Committee is in full agreement with you, Paul, that the pay cap should go away, and I think one thing we could do, instead of taking this off the agenda, we could move it to Old Business. And since Richmond and Raleigh are GS locality pay areas we would need to take a look at, we could take a look at those areas in due course. And we can't do everything all at once, but we can take a look at those two locality pay areas.

Chair Lachance: Maybe get a more comprehensive solution.

Mr. Allen: Right.

Chair Lachance: Yes. We can work toward a more comprehensive solution by taking that course of action.

Mr. Allen: I do know that it's true on both the GS side and the Federal Wage System side that the people do leave one Bureau of Prisons facility to go work at another one that has higher wage levels, and this is something that I first heard back in the late—I think it was the late '90s when Butner was first established as a new federal prison, that they had difficulty convincing people to go work there because the wage schedule was lower than at some prisons where they were trying to recruit people.

Chair Lachance: I suggest we go down that road, and since there is no consensus on moving on going ahead with this, let's see if we can incorporate it into some of our larger work and see if there's a solution perhaps when we pull the lens back a little bit and look at a bigger picture. Does that make sense for the group?

I'm pretty desperate to keep Paul's head from exploding.

[Laughter.]

Mr. O'Connor: Thank you.

Chair Lachance: Great. Thanks, everybody.

Well, there are no other items under New Business. So it is in order for us to adjourn.

Mr. Loeb: Excuse me. Hi.

Chair Lachance: Hi, Rich.

Mr. Loeb: There was an item that I had sent earlier this week and asked that it be

put on the agenda. Mark will recall that it involved the Canyonlands National Park located in Southeastern Utah.

Chair Lachance: We do ask that new agenda items be submitted at least a week ahead of time.

Mr. Loeb: I understand.

Chair Lachance: Do you want to introduce that now? You can introduce it.

Mr. Loeb: Well, I understand that, but Mark's reply email said to bring it up. So I'm just—I'm not expecting that you'll consider, I just want to make sure it's on the agenda. That's all.

Mr. Allen: I think we can take a look at that general area there, another one of National Parks, National Monuments in that area that we just need to present the Committee with a full picture of what all is around.

Mr. Loeb: That's fine. I don't expect it to be discussed. I'm just following up with your email saying to bring it up, so I'm bringing it up so it's formally part of the agenda. That's all.

Chair Lachance: Do you have a three- or four-sentence summary of the situation so people can understand what—

Mr. Loeb: It strikes me as an odd situation, but that's why I guess it—so you have a county in which this is a large National Park with a number of National Monuments near it. It's located in Southeastern Utah, and some of the monuments expand over to Northern Arizona. The particular county in Southeastern Utah, San Juan County, Utah,

which is where the most— almost all of Canyonlands National Park is located. It is subject to the Northeastern Arizona wage schedule. However, only Canyonlands National Park within this county is not, which results in the park employees being subject to the state of Utah wage schedule, which does not—which is less than Northeastern Arizona, and the monument employees and the rest of that same—the same county San Juan County, are on the higher Northeastern Arizona wage schedule.

This is a lot like the situation we faced with Shenandoah where you also have the employees who are at the park going into doing maintenance in the National Monuments located technically outside the park but still in that same county. And then the reverse occurs that people assign to those monuments go into the park.

It's just odd that that particular National Park located in a county with a particular wage rate is excluded from that wage rate determination. It says applies to all of San Juan County except for employees in Canyonlands National Park.

There are other factors, including the fact that the determination was based upon, I think, a pattern that existed over a dozen years ago when the area was mostly sort of a rural area. It's now become a tourist area, largely, and it just sort of changed the entire nature of the county, including people who work at Canyonlands.

Just FYI, the total number of employees that would be affected are believed to be about 80 full-time and about 40 seasonal, but I'm getting more data on that. That's it

Chair Lachance: Great. Thank you, Rich.

Mr. Loeb: Sure.

Chair Lachance: So we have that on the agenda for the next meeting?

Mr. Allen: I believe so, yes.

Chair Lachance: Now are we ready to adjourn. I know we have a working group meeting scheduled. This meeting ran a little long. Should we reconvene in about five minutes? Let's do five. Maybe 11:20.

Mr. O'Connor: Sounds good.

Chair Lachance: All right. Thanks, everyone.

[End of recorded session.]