



AMERICAN
IMMIGRATION
LAWYERS
ASSOCIATION

December 24, 2018

William W. Thompson II,
Administrator
Office of Foreign Labor Certification
Box PPII 12-200
Employment & Training Administration
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

Submitted via e-mail: ETA.OFLC.Forms@dol.gov

**RE: OMB Control Number 1205-0466
Department of Labor 60-Day Notice and Request for Comments:
H-2A Temporary Agricultural Labor Certification Program Forms**

Dear Mr. Thompson:

The American Immigration Lawyers Association (AILA) submits the following comments in response to the above referenced 60-Day Notice and request for comments published in the Federal Register on October 25, 2018.¹ This notice of information collection solicits comments on the H-2A temporary agricultural employment-based visa program, which includes Form ETA-9142A, ETA 790/ETA 790A, related appendices, and applicable instructions.

AILA is a voluntary bar association of more than 15,000 attorneys and law professors practicing, researching, and teaching in the field of immigration and nationality law. Our mission includes the advancement of the law pertaining to immigration and nationality and the facilitation of justice in the field. AILA members regularly advise and represent businesses, U.S. citizens, lawful permanent residents, and foreign nationals regarding the application and interpretation of U.S. immigration laws. We appreciate the opportunity to comment on the H-2A temporary non-agricultural labor certification program forms and believe that our members' collective expertise provides experience that makes us particularly well-qualified to offer views on this matter. We appreciate the Department of Labor's (DOL) desire to enhance the quality, utility, and clarity of the information collected, while minimizing the burden on stakeholders and maintaining a streamlined and efficient application process. It is in this same spirit that we offer the following comments.

As an initial matter, AILA greatly appreciates the Department of Labor's efforts to streamline the H-2A process by proposing to issue electronic certifications. We believe this action will significantly improve the H-2A process without jeopardizing the integrity of the H-2A program.

¹ 83 Fed. Reg. 53911 (October 25, 2018)

Form ETA-790/790A, Addendum A and ETA-790A Form Instructions: H-2A Agricultural Clearance Order

General Comment

We understand the Department of Labor's interest in modifying the H-2A forms to ensure that there is consistency between the Form ETA-790 and Form ETA-9142A. However, as a general matter, we are concerned that by not allowing employers to submit attachments to the forms to more fully describe the material terms and conditions of employment, there may not be enough text space to properly respond to specific questions. We also note that none of the questions on the new forms include Spanish translations and there is no space to include such a translation. Since the Form ETA-790 and ETA-790A/Addendum A represent the H-2A contract that must be provided to H-2A and corresponding employees, we recommend that the Department of Labor include either a Spanish version of the forms or additional space to include the Spanish translation on the existing proposed forms.

Form ETA-790

1. Section II: Employer Contact Information

We recommend that the Form ETA-790 include a question (Section II, Proposed Number 17) to include the employer's state unemployment or tax identification number which is used by many State Workforce Agencies to verify an employer's existence and simplify the process to open a clearance order.

Also, we recommend that Section II, number 14, "Business e-mail address" should be made optional.

2. Suggested Section: Attorney/Agent Contact Information:

The Form ETA 790 should contain a section to provide the employer's attorney or agent contact information, including name, address, FEIN, telephone number and email address.

Form ETA-790A and Addendum A

1. Section III A. Job Offer Information

A5. Anticipated days and hours of work per week:

We recommend including a text box in this section to allow for a fuller description of the number of hours to be offered to agricultural workers. While we understand the need to streamline the review process, prohibiting employers from including attachments or addendums and requiring all information about hours to be included in Section A5., may result in an employer's inability to provide material information about the terms and conditions of employment. (i.e. Whether overtime may be requested or required; whether occasional work on Saturdays or weekends may be rested or required, etc.).

A6. Hourly work schedule:

We recommend including a text box to permit employers to explain that daily start and end times may vary, for example, due to weather conditions and crop readiness.

A7a. and A7b. and Addendum A (a.1 and 2 and b. 1 and 2) Name of Crop or Agricultural Activity and Description of the job duties to be performed:

The proposed Forms ETA-790A and ETA-790A Addendum A appear to limit the number of crop or agricultural activities that can be performed to only those that will now fit in the space provided on the forms. We recommend that the Department of Labor permit employers to continue to include attachments to the job order to more fully describe the job duties to be performed.

In addition, it is not clear if ETA-790A, Questions A7a. and A7b. as well as Addendum A, Crop or Agricultural Activity Information 1 and Crop or Agricultural Activity Information 2 pertain to multiple crop/agricultural activities or whether only a single crop/agricultural activity can be included in each of the three limited spaces available. We assume that employers can include multiple crop or agricultural activities in each of the text spaces available since there is space to identify up to 5 different wage rates for each of the activities. However, as this is not clear, we recommend that the form instructions state that multiple crop/agricultural activities may be included in each of the “job duty” text spaces provided in ETA-790A and Addendum A. Alternatively, we recommend that the Department of Labor pluralize the headings in Questions 7a. and Addendum A to state, “Name of Crop or Agricultural *Activities*” and include an instruction that permits an employer to submit multiple Forms ETA-790A Addendum A if additional space is needed.

A7c-A7f: Wage Offer Information

In Item 7d., we recommend creating two boxes entitled “Hour” or “Month” for employers to provide a unit of pay in one or the other, as directed in the instructions for ETA-790A.

Additionally, it is very common for multiple piece rates to apply to different types of agricultural commodities and for different types of pack per variety. For example, in celery harvesting, there may be up to 25 different piece rates that apply to different packs of celery.² Likewise, for lettuce, different piece rates apply to romaine, iceberg, mixed leaf, green life, romaine hearts etc. with a different piece rate applicable to different packs within each variety. Again, there may be over 40 applicable piece rates. The proposed forms, including Addendum A, provide space to identify only up to 6 different piece rates. Therefore, without attachments, employers will be unable to provide a full disclosure of wages. This is especially true because the form instructions for Item 10, “Additional conditions about the wage offer(s)”, expressly request employers to exclude piece rate information provided in 7f. We recommend that a text box be added to address this issue of limited space.

² See page 13 of Appendix A attached to this document for redacted version of piece rates applicable to celery harvest.

A10. Additional conditions about the wage offer(s):

The form instructions require employers to include in Item A10. information about production standards, bonuses, and/or other expenses that will be paid by the employer. According to the instructions, piece rate information should not be included in the space provided. Many agricultural employers include substantial and critical information in this section including complex bonus and incentive systems, holiday pay, jury duty, special benefits, and if a collective bargaining agreement (CBA) exists, required incentive pay items from a CBA. We anticipate that there will not be enough text space to accurately disclose additional wage information in this text box and note that there is no space on the Addendum A to provide additional information of this nature as well. As such, we recommend that additional space be provided for this item or that the Department of Labor permit a separate attachment to be included.

A11. Deductions

We appreciate the Department of Labor using a text box for information about deductions rather than the current Form ETA-790 which includes only boxes to check off. The proposed item A11. affords employers the flexibility needed to address different tax and benefit deductions applicable to H-2A and corresponding domestic workers, among other information that may be applicable.

2. Section III B: Minimum Job Qualifications/Requirements

We believe that this section may have insufficient space to identify special requirements applicable to the job offered. Similar to other sections in the proposed forms, we recommend that more space be added or that the Department of Labor permit a separate attachment to be included.

3. Section III C: Worksite Information and Addendum B

We have reviewed the comments prepared by the Florida Fruit and Vegetable Association (FFVA) for this form and join in its comment regarding Addendum B. At the time of filing, it is impossible to provide information about the specific dates that workers will be assigned to a specific worksite within the dates of need. It is also impossible to provide the exact number of workers that will be assigned to a particular worksite on such specific dates (Question C.a.3 and C.a.4). This is especially the case for H-2ALCs who will work at multiple worksites—sometimes over 40 or more worksites --during a given H-2A contract period. We also note that FFVA's comment is not limited to the citrus industry—it would be applicable to virtually all agricultural activities where multiple worksites exist. Weather and market conditions change dramatically each year and throughout a specific season. Therefore, we recommend that the Department of Labor remove questions C.a.3 and C.a.4 concerning begin and end dates on the proposed Addendum B form and permit (and instruct) employers to include in Item 10 “Additional Worksite Information”, the approximate period of time that agricultural workers may be assigned to a particular worksite, which may be the same as the employer's overall H-2A period of need.

We also agree with FFVA's comment about the form limitations on the number of worksites. Current job orders can list far more than the 5 locations permitted on ETA-Form 790A and Addendum B. Currently, employers fill out a chart listing all worksites and include the chart in an addendum to the Form ETA-790.³ This process is already arduous, without the prospect of needing to complete multiple Form Addendum Bs, assuming that submitting multiple Addendum Bs would be permitted. We estimate that completing each item requested in Addendum B would add an additional 10-15 hours, at a minimum, in preparation time for most H-2A applications. Moreover, assuming Addendum B would be part of the H-2A contract that is required to be provided to H-2A and corresponding domestic workers, this alone would add an additional 75 pages or more to the contract. This will inevitably cause a great deal of confusion for agricultural workers and will require a great deal of paper.

We recommend that the Department of Labor continue to allow employers to submit an attachment identifying its itinerary and the worksites where work will be performed throughout the H-2A season.

4. Section III D: Housing Information and Addendum B

We recommend that the Department of Labor remove Item 9. This question requests employers to identify which housing standards apply—Local, State or Federal. This question is best presented to the housing inspection authority that conducts the housing inspections as employers may not know which standard the inspector has or will rely upon. In California, for example, many local townships, cities and counties adopt local standards that frequently change.

5. Section III H: Other Material Terms and Conditions of the Job Offer

We encourage the expansion of this text box and suggest that the Department of Labor add an option for attachments to accommodate individual job order specifications. By doing so, it may not be necessary to add other attachments as recommended herein, apart from Addendum B items.

6. Section III I: Conditions of Employment and Assurances: Number 8:

We recommend that the Department of Labor carefully review this attestation to ensure that it is consistent with the regulation set out in 20 CFR 655.122(i). Specifically, we recommend removing the last sentence in the second paragraph referring to "8" hours a day which refers to an example provided in the regulations. This form is signed under penalty of perjury and should not contain items that are not required by law.

Form ETA-9142A, Appendix A, and General Instructions

1. Appendix A, Section A. Attorney or Agent Declaration:

A5. Signature

³ See pages 1-13 of Appendix A attached to this document for an example of a document compiled by employers containing worksite locations contained in Job Orders.

The instructions for Item 5 in Appendix A, Section A are to enter the email address of the attorney/agent representing the employer in filing the application, but the space provided on Form ETA 9142A only seeks a signature and does not provide space or heading for an email.

A6. Date Signed

The instruction for Item 6 in Appendix A, Section A states the attorney/agent must sign the form. However, the space provided on Form ETA9142A requests the “Date signed”.

Conclusion

We appreciate the opportunity to comment on the proposed changes to the H-2A temporary agricultural labor certification program forms and applicable instructions. We look forward to a continuing dialogue with the Department of Labor on these issues.

Sincerely,

THE AMERICAN IMMIGRATION LAWYERS ASSOCIATION

Appendix A

Sample worksite locations contained in Job Orders

Ranch	Address	Directions
A		Take exit 59 for Del Norte Blvd Turn right onto N Del Norte Blvd Turn right onto E 5th St Turn left onto CA-1 N Keep right to continue on S Rice Ave, follow signs for Rice Avenue Turn left onto E Hueneme Rd Destination will be on the left
B		Take US-101 S to N Rice Ave in Oxnard. Take exit 60 from US-101 S Head northwest on US-101 N Use the 2nd from the right lane to take exit 65 for Telephone Rd toward Natl Guard Armory Use the left lane to turn left onto Telephone Rd Use the left 2 lanes to turn sharply left to merge onto US-101 S toward Los Angeles Use the right lane to take exit 60 for Rice Ave/Santa Clara Ave Keep right at the fork and merge onto N Rice Ave Follow N Rice Ave to CA-34 E Merge onto N Rice Ave Turn left onto CA-34 E
C		Take US-101 S to Johnson Dr. Take exit 63B from US-101 S Head southeast on US-101 S Take exit 63B for Johnson Drive Get on CA-126 E/Hwy 126 E Turn left onto Johnson Dr Turn right onto Telephone Rd Use the left 2 lanes to turn left onto S Kimball Rd Slight right to merge onto CA-126 E/Hwy 126 E Follow CA-126 E/Hwy 126 E to S Briggs Rd. Take exit 9 from CA-126 E/Hwy 126 E Merge onto CA-126 E/Hwy 126 E Take exit 9 for Briggs Road Take Faulkner Rd to Todd Ln Turn left onto S Briggs Rd Turn right onto Faulkner Rd Turn right onto Clow Rd Turn left onto Todd Ln

D		<p>Take CA-126 E to S Briggs Rd. Take exit 9 from CA-126 E</p> <p>Head northwest on US-101 N</p> <p>Take exit 66A for State Route 126 E toward Santa Clarita</p> <p>Merge onto CA-126 E</p> <p>Take exit 9 for Briggs Road</p> <p>Follow Pinkerton Rd to Mission Rock Rd</p> <p>Turn right onto S Briggs Rd</p> <p>Turn right onto Pinkerton Rd</p> <p>Slight left onto Mission Rock Rd</p> <p>Slight right to stay on Mission Rock Rd</p>
E		<p>Head northwest on US-101 N</p> <p>Use the right lane to take exit 65 for Telephone Rd toward Natl Guard Armory</p> <p>Turn right onto Telephone Rd</p>
F		<p>Follow US-101 S to N Rice Ave in Oxnard. Take exit 60 from US-101 S</p> <p>Head east on US-101 S</p> <p>Keep left at the fork to stay on US-101 S</p> <p>Use the right lane to take exit 60 for Rice Ave/Santa Clara Ave</p> <p>Keep right at the fork and merge onto N Rice Ave</p> <p>Drive to N Rice Ave</p> <p>Merge onto N Rice Ave</p> <p>Turn left at E Gonzales Rd</p> <p>Make a U-turn</p> <p>Turn right onto N Rice Ave</p>
G		<p>Take US-101 S to Valentine Rd. Take exit 64 from US-101 S</p> <p>Head southeast on US-101 S</p> <p>Take exit 64 toward Victoria Ave/Channel Island Harbor</p> <p>Get on CA-126 E</p> <p>Use the left lane to turn left onto Valentine Rd</p> <p>Use the left 3 lanes to turn left onto S Victoria Ave</p> <p>Turn right to merge onto CA-126 E toward Santa Clarita</p> <p>Merge onto CA-126 E</p> <p>Drive to E Guiberson Rd</p> <p>Turn right onto A St</p> <p>Continue onto CA-23 S/Chambersburg Rd</p> <p>Turn left onto E Guiberson Rd</p>
H		<p>Head southeast on US-101 S</p> <p>Take exit 61 for Rose Ave</p> <p>Use the left 2 lanes to turn left onto N Rose Ave</p> <p>Turn left onto CA-118 W</p> <p>Continue onto S Wells Rd</p> <p>Turn right onto W Telegraph Rd</p>

I		<p>Head northwest on US-101 N Take exit 66A for State Route 126 E toward Santa Clarita Merge onto CA-126 E Take exit 5 for Wells Rd/CA-118 toward Saticoy Turn left onto CA-118 W/S Wells Rd Continue to follow S Wells Rd Turn right onto W Telegraph Rd Turn right onto Todd Rd</p>
J		<p>Head northwest on US-101 N Take exit 66A for State Route 126 E toward Santa Clarita Merge onto CA-126 E Take exit 9 for Briggs Road Turn left onto S Briggs Rd</p>
K		<p>Head northwest on US-101 N Take exit 66A for State Route 126 E toward Santa Clarita Merge onto CA-126 E Take exit 9 for Briggs Road Turn left onto S Briggs Rd Turn right onto W Telegraph Rd</p>
L		<p>Head northwest on US-101 N Take exit 66A for State Route 126 E toward Santa Clarita Merge onto CA-126 E Take exit 5 for Wells Rd/CA-118 toward Saticoy Turn right onto CA-118 E/S Wells Rd Turn left onto Darling Rd</p>
M		<p>Continue to Telegraph Rd Head east on Wall St Turn left toward Telegraph Rd Take S Victoria Ave, US-101 S and N Rice Ave to E Hueneme Rd Turn right at the 1st cross street onto Telegraph Rd Use the right 2 lanes to turn right onto S Victoria Ave Use the right 2 lanes to turn right onto Valentine Rd Use the right 2 lanes to turn right to merge onto US-101 S Use the right lane to take exit 60 for Rice Ave/Santa Clara Ave Keep right at the fork and merge onto CA-1 N/N Rice Ave Keep right to continue on S Rice Ave, follow signs for Rice Avenue Turn left onto E Hueneme Rd Turn right to stay on E Hueneme Rd</p>
N		<p>Head east on US-101 S Keep left at the fork to stay on US-101 S Take exit 55 for Las Posas Rd Use the right 2 lanes to turn right onto Las Posas Rd Turn left onto Pleasant Valley Rd</p>

		Turn left onto Southfield Rd
O		Head southeast on US-101 S Take exit 53A toward Dawson Dr Continue onto Village at the Park Dr Continue straight to stay on Village at the Park Dr Turn right onto Village Commons Blvd Turn left onto Pleasant Valley Rd
P		Take US-101 N to S Victoria Ave in Ventura. Take exit 64 from US-101 N Head southeast on US-101 S Take exit 61 for Rose Ave Use the middle lane to turn left onto N Rose Ave Turn right to merge onto US-101 N toward Ventura Take exit 64 for Victoria Ave toward Channel Island Harbor Drive to Olivas Park Dr Use the left 2 lanes to turn left onto S Victoria Ave Turn right onto Olivas Park Dr
Q		Head southeast on US-101 S Take exit 55 for Las Posas Rd Use the right 2 lanes to turn right onto Las Posas Rd Turn right onto Hueneme Rd Destination will be on the left
R		Head southeast on US-101 S Take exit 59 for Del Norte Blvd Turn right onto N Del Norte Blvd Turn left onto Sturgis Rd Destination will be on the left
S		Head southeast on US-101 S Take exit 53B toward CA-34/Lewis Rd Use the middle lane to turn left onto Ventura Blvd Turn right at the 1st cross street onto S Lewis Rd
T		Head east on US-101 S Take exit 55 for Las Posas Rd Use the right 2 lanes to turn right onto Las Posas Rd
U		Head east on US-101 S Take exit 55 for Las Posas Rd Use the right 2 lanes to turn right onto Las Posas Rd Turn right onto Pleasant Valley Rd Slight right onto E Pleasant Valley Rd
V		Head east on US-101 S Take exit 52 for Pleasant Valley Rd/Santa Rosa Rd Destination will be on the right
W		Take US-101 S to Central Ave in Camarillo. Take exit 57 from US-101 S Head northwest on US-101 N

		Take exit 64 for Victoria Ave toward Channel Island Harbor Use the 2nd from the left lane to turn left onto S Victoria Ave Use the right 2 lanes to turn right onto Valentine Rd Use the right 2 lanes to turn right to merge onto US-101 S Take exit 57 for Central Ave Turn left onto Central Ave
X		Head northwest on US-101 N Take exit 66A for State Route 126 E toward Santa Clarita Merge onto CA-126 E
Y		Get on US-101 S Follow US-101 S to Ventura Blvd in Camarillo. Take exit 53B from US-101 S Take S Lewis Rd to Pleasant Valley Rd
Z		Continue to US-101 N Follow US-101 N to Las Posas Rd in Camarillo. Take exit 55 from US-101 N Continue on Las Posas Rd. Drive to Laguna Rd
AA		Take US-101 N to Las Posas Rd in Camarillo. Take exit 55 from US-101 N Follow Las Posas Rd to Laguna Rd

Ranch	Address	Directions
BB		Head southeast on Price St toward Bay St Pass by Rabobank (on the right in 0.3 mi) Follow US-101 S to CA-154 E/San Marcos Pass Rd in Santa Barbara County. Take exit 146 from US-101 S Get on US-101 S in Santa Barbara Follow US-101 S to Camarillo Springs Rd in Camarillo. Take exit 50 from US-101 S Turn left onto Camarillo Springs Rd
CC		Take Central Ave, N Rose Ave and CA-118 W to Darling Rd in Ventura Head east on US-101 S Take exit 56 toward Springville Dr Use the left lane to turn left onto Springville Dr Use the left 2 lanes to turn left to merge onto US-101 N Take exit 57 to merge onto Central Ave Turn right onto N Rose Ave Turn left onto CA-118 W Turn right onto Darling Rd
DD		Head east on US-101 S Take exit 55 for Las Posas Rd Use the right 2 lanes to turn right onto Las Posas Rd

		<p>Turn left onto Laguna Rd Turn right to stay on Laguna Rd</p>
EE		<p>Head southeast on US-101 S Keep left at the fork to stay on US-101 S Take exit 55 for Las Posas Rd Use the right 2 lanes to turn right onto Las Posas Rd Turn left onto Laguna Rd Turn right to stay on Laguna Rd</p>
FF		<p>Head southeast on US-101 S Keep left at the fork to stay on US-101 S Take exit 55 for Las Posas Rd Use the right 2 lanes to turn right onto Las Posas Rd Turn left onto Laguna Rd Turn right to stay on Laguna Rd 860 Potrero Rd, Camarillo, Ca. 93012 If you reach Via Agosta, you've gone too far</p>
GG		<p>Head east on US-101 S Take exit 53B toward CA-34/Lewis Rd Use the left lane to turn left onto Ventura Blvd Use the left 2 lanes to turn left onto N Lewis Rd Continue onto CA-34 W/Somis Rd</p>
HH		<p>Head southeast on Price St toward Bay St Pass by Rabobank (on the right in 0.3 mi) Follow US-101 S to CA-154 E/San Marcos Pass Rd in Santa Barbara County. Take exit 146 from US-101 S Get on US-101 S in Santa Barbara Follow US-101 S to Wagon Wheel Rd in Oxnard. Take exit 63A from US-101 S Follow N Ventura Rd to Teal Club Rd</p>
II		<p>Head southeast on Price St toward Bay St Pass by Rabobank (on the right in 0.3 mi) Follow US-101 S to CA-154 E/San Marcos Pass Rd in Santa Barbara County. Take exit 146 from US-101 S Get on US-101 S in Santa Barbara Follow US-101 S to Valentine Rd in Ventura. Take exit 64 from US-101 S Drive to S Victoria Ave</p>
JJ		<p>Head west on US-101 N Take exit 66A for State Route 126 E toward Santa Clarita Merge onto CA-126 E Take exit 9 for Briggs Road Turn left onto S Briggs Rd Turn right onto W Telegraph Rd</p>
KK		<p>Head northwest on US-101 N Take exit 66A for State Route 126 E toward Santa Clarita Merge onto CA-126 E</p>

		<p>Take exit 9 for Briggs Road Turn right onto S Briggs Rd Turn right onto Pinkerton Rd Keep right to stay on Pinkerton Rd Destination will be on the right</p>
LL		<p>Head northwest on US-101 N Take exit 66A for State Route 126 E toward Santa Clarita Merge onto CA-126 E Destination will be on the right</p>
MM		<p>Head northwest on US-101 N Take exit 66A for State Route 126 E toward Santa Clarita Merge onto CA-126 E Take exit 5 for Wells Rd/CA-118 toward Saticoy Turn left onto CA-118 W/S Wells Rd Continue to follow S Wells Rd Turn right onto W Telegraph Rd</p>
NN		<p>Head northwest on US-101 N Take exit 66A for State Route 126 E toward Santa Clarita Merge onto CA-126 E Take exit 5 for Wells Rd/CA-118 toward Saticoy Turn left onto CA-118 W/S Wells Rd Continue to follow S Wells Rd Turn right onto Foothill Rd Destination will be on the right Pumpkin Patch at Limoneira Ranch</p>
OO		<p>Get on CA-126 E from Exit 66B Follow CA-126 E to S Briggs Rd. Take exit 9 from CA-126 E Continue on S Briggs Rd. Drive to Santa Paula St</p>
PP		<p>Head northwest on US-101 N Take exit 68 for Seaward Ave Use the left lane to keep left at the fork and continue toward S Seaward Ave Use the left lane to turn left onto S Seaward Ave Use the left 2 lanes to turn left onto E Harbor Blvd Turn left onto W Gonzales Rd</p>
QQ		<p>Head east on US-101 S Keep right at the fork to continue on CA-126 E, follow signs for State Route 126 E/Santa Clarita Take exit 9 for Briggs Road Turn left onto S Briggs Rd Turn right onto W Telegraph Rd</p>
RR		<p>Take exit 66A for State Route 126 E toward Santa Clarita Merge onto CA-126 E Take exit 9 for Briggs Road Turn right onto S Briggs Rd</p>

		Turn right onto Pinkerton Rd Slight left onto Mission Rock Rd
SS		Follow US-101 N, Ventura Fwy and CA-126 E to S Briggs Rd. Take exit 9 from CA-126 E Take Cummings Rd to Ranch Rd
TT		Get on CA-126 E from Exit 66B Follow CA-126 E to CA-118 E/S Wells Rd. Take exit 5 from CA-126 E Drive to Darling Rd
UU		Take exit 66A for State Route 126 E toward Santa Clarita Merge onto CA-126 E Take exit 9 for Briggs Road Turn left onto S Briggs Rd Turn left onto W Telegraph Rd
VV		Head northwest on US-101 N Take exit 66A for State Route 126 E toward Santa Clarita Merge onto CA-126 E Take exit 9 for Briggs Road Turn left onto S Briggs Rd Turn right onto W Telegraph Rd Destination will be on the left
WW		Head northwest on US-101 N Take exit 66A for State Route 126 E toward Santa Clarita Merge onto CA-126 E Take exit 5 for Wells Rd/CA-118 toward Saticoy Turn left onto CA-118 W/S Wells Rd Continue to follow S Wells Rd Turn right onto W Telegraph Rd Turn right onto Todd Rd
XX		Head northwest on US-101 N Take exit 66A for State Route 126 E toward Santa Clarita Merge onto CA-126 E Take exit 9 for Briggs Road Turn left onto S Briggs Rd Turn right to merge onto CA-126 W toward Ventura
YY		Take US-101 S to N Del Norte Blvd in Oxnard. Take exit 59 from US-101 S Continue on N Del Norte Blvd. Drive to S Wolff Rd
ZZ		Follow US-101 S to CA-1 N/N Rice Ave in Oxnard. Take exit 60 from US-101 S Get on CA-1 S Merge onto CA-1 Take Calleguas Creek Rd and Caryl Dr to Broome Ranch Rd
AAA		Head southeast on US-101 S

		Take exit 55 for Las Posas Rd Use the right 2 lanes to turn right onto Las Posas Rd Turn left onto Cawelti Rd Destination will be on the right
BBB		Take US-101 S and Ventura Fwy to Rice Ave in Oxnard. Take exit 60 from US-101 N/Ventura Fwy Follow Rice Ave to Hueneme Rd
CCC		Head east on US-101 S Take exit 59 for Del Norte Blvd Turn right onto N Del Norte Blvd Turn left onto CA-34 E/E 5th St Turn right onto Wood Rd
DDD		Take US-101 S, Central Ave, CA-118 W and W Telegraph Rd to Todd Rd Follow Todd Rd to E Gaythorne Rd
EEE		Take US-101 S and CA-1 N/N Rice Ave to Etting Rd in Oxnard Take Olds Rd to Hueneme Rd Turn left onto Hueneme Rd
FFF		Take US-101 S to CA-1 N/N Rice Ave. Take exit 60 from US-101 S Get on CA-1 S Continue on CA-1 S to Hueneme Rd. Take exit 109 from CA-1 S Follow Hueneme Rd to Wood Rd
GGG		Head east on US-101 S Take exit 59 for Del Norte Blvd Turn right onto N Del Norte Blvd Turn left onto Sturgis Rd Turn right onto E Pleasant Valley Rd
HHH		Take US-101 N to S Victoria Ave in Ventura. Take exit 64 from US-101 N Drive to N Victoria Ave
III		Take exit 55 for Las Posas Rd Use the right 2 lanes to turn right onto Las Posas Rd Turn left onto CA-34 E
JJJ		Head east on US-101 S Take exit 59 for Del Norte Blvd Turn right onto N Del Norte Blvd Turn right onto E 5th St Turn left onto CA-1 N Make a U-turn
KKK		Take US-101 S and Exit 60 to Rice Ave. Take exit 60 from US-101S Get on US-101 N

		Follow US-101 N to S Victoria Ave in Ventura. Take exit 64 from US-101 N Continue on S Victoria Ave. Drive to Olivas Park Dr
LLL		Take US-101 S to N Del Norte Blvd in Oxnard. Take exit 59 from US-101 S Continue on N Del Norte Blvd. Drive to Sturgis Rd
MMM		Take Johnson Dr and Bristol Rd to Ramelli Ave Turn left onto Ramelli Ave Take Foothill Rd to Aliso Canyon Rd Turn left onto Aliso Canyon Rd
NNN		Take US-101 S and N Del Norte Blvd to S Wolff Rd Turn right onto S Wolff Rd Turn right onto E Pleasant Valley Rd Continue on Hailes Rd. Drive to Etting Rd
OOO		Head southeast on US-101 S Take exit 59 for Del Norte Blvd Turn right onto N Del Norte Blvd Turn left onto CA-34 E/E 5th St Turn right onto Wood Rd
PPP		Take exit 53B toward CA-34/Lewis Rd Turn right onto Ventura Blvd Turn right onto Arneill Rd Pass by Burger King (on the left) Use the left 2 lanes to turn left onto Las Posas Rd Destination will be on the right
QQQ		Head west on US-101 N Use the right 2 lanes to take exit 60 for Santa Clara Avenue/Rice Ave Use the left 2 lanes to turn left onto Rice Ave Keep right to continue on S Rice Ave, follow signs for Rice Avenue Turn left onto E Hueneme Rd
RRR		Follow US-101 S to CA-154 E/San Marcos Pass Rd. Take exit 146 from US-101 S Get on US-101 S in Santa Barbara Follow US-101 S to N Del Norte Blvd in Oxnard. Take exit 59 from US-101 S Continue on N Del Norte Blvd. Take E Pleasant Valley Rd to Hailes Rd
SSS		Follow US-101 N to CA-1 N/N Rice Ave in Oxnard. Take exit 60 from US-101 S Continue on CA-1 N/N Rice Ave. Drive to Calleguas Creek Rd
TTT		Follow US-101 S to Garden St in Santa Barbara. Take exit 96C from US-101 S Get on US-101 S in Montecito from E Cabrillo Blvd

		Follow US-101 S to Las Posas Rd in Camarillo. Take exit 55 from US-101 S Follow Las Posas Rd to Hueneme Rd
UUU		Head east on US-101 S Keep left at the fork to stay on US-101 S Take exit 59 for Del Norte Blvd Turn right onto N Del Norte Blvd Turn left onto CA-34 E/E 5th St Turn right onto S Wolff Rd Turn right onto E Pleasant Valley Rd
VVV		Follow US-101 S to CA-1 N/N Rice Ave in Oxnard. Take exit 60 from US-101 S Continue on CA-1 N/N Rice Ave. Drive to Hueneme Rd 10 min (7.0 mi)
WWW		Head southeast on US-101 S Keep left at the fork to stay on US-101 S Use the right lane to take exit 60 for Rice Ave/Santa Clara Ave Use the middle lane to keep left at the fork and continue toward Rice Ave Use the right lane to turn left onto Rice Ave Continue onto Santa Clara Ave
XXX		Head southeast on US-101 S Keep left at the fork to stay on US-101 S Use the right lane to take exit 60 for Rice Ave/Santa Clara Ave Use the middle lane to keep left at the fork and continue toward Rice Ave Use the right lane to turn left onto Rice Ave Continue onto Santa Clara Ave Use the left 2 lanes to turn left onto Central Ave Destination will be on the right
YYY		Head southeast on US-101 S Use the right lane to take exit 60 for Rice Ave/Santa Clara Ave Keep right at the fork and merge onto N Rice Ave Turn left onto Camino Del Sol Turn left onto N Del Norte Blvd Destination will be on the right Del Norte Distribution
ZZZ		Take CA-126 E to A St in Fillmore Drive to E Guiberson Rd
AAAA		Head northeast on US-101 S Keep right at the fork to continue on CA-126 E, follow signs for State Route 126 E/Santa Clarita Take exit 11 for Palm Ave

		<p>Turn left onto S Palm Ave Pass by Denny's (on the right) Turn right onto Harvard Blvd Turn right onto 12th St/S Mountain Rd Continue to follow S Mountain Rd Turn left onto San Cayetano St Destination will be on the left</p>
BBBB		<p>Take US-101 N to Telephone Rd. Take exit 65 from US-101 N Get on US-101 S Follow US-101 S to Johnson Dr. Take exit 63B from US-101 S Continue on Johnson Dr. Take Auto Center Dr to Ventura Rd</p>
CCCC		<p>Take US-101 S to Valentine Rd. Take exit 64 from US-101 S Get on CA-126 E Follow CA-126 E to S Briggs Rd. Take exit 9 from CA-126 E Follow Pinkerton Rd to Mission Rock Rd</p>
DDDD		<p>Head northwest on US-101 N Take exit 66A for State Route 126 E toward Santa Clarita Merge onto CA-126 E Take exit 3 for Kimball Rd Keep right at the fork and merge onto S Kimball Rd Use the right lane to turn right onto Telephone Rd Destination will be on the right</p>
EEEE		<p>Head northwest on US-101 N Take exit 66A for State Route 126 E toward Santa Clarita Merge onto CA-126 E Take exit 5 for Wells Rd/CA-118 toward Saticoy Turn left onto CA-118 W/S Wells Rd Continue to follow S Wells Rd Turn right onto W Telegraph Rd</p>
FFFF		<p>Take US-101 S to N Del Norte Blvd in Oxnard. Take exit 59 from US-101 S Continue on N Del Norte Blvd. Drive to Ventura Blvd</p>
GGGG		<p>Head southeast on US-101 S Take exit 61 for Rose Ave Use the left 2 lanes to turn left onto N Rose Ave Destination will be on the right</p>
HHHH		<p>Head southeast on US-101 S Use the right 2 lanes to take exit 60 for Rice Ave/Santa Clara Ave Keep left at the fork</p>
IIII		<p>Get on CA-33 S</p>

		Follow CA-33 S and US-101 S to Valentine Rd in Ventura. Take exit 64 from US-101 S Follow S Victoria Ave to Olivas Park Dr
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Sample Piece Rates contained in Job Orders:

Conventional Celery		
Pack	UOM	Rate
1/2 Box Regular	Carton	
3 Count	Carton	
6 Count	Carton	
8 Count	Carton	
4/5 Pack Regular	Carton	
24/30 RPC Naked	Carton	
30ct IFCO	Carton	
30ct Kroger	Carton	
Naked	Carton	
Export Naked	Carton	
Export Sleeve	Carton	
4/5 Pack Sleeve	Carton	
24/30 RPC Sleeve	Carton	
Sleeve	Carton	
4/5 Poly Banded	Carton	
30CT Banded	Carton	
Naked Rubber Banded	Carton	
18X2 Zip Lock Heart (Trader Joe)	Carton	
22ct Hearts	Carton	
Hearts	Carton	
Wholestalk Process Totes	Tote	
1/2 Small/Med Bin	Bin	
7" & 9" Stick Bins	Bin	
Large Bin Wholestalk	Bin	
Pack	UOM	
Naked	Carton	
Sleeves	Carton	
Export Naked	Carton	
Export Sleeve	Carton	
30ct Banded	Carton	
Rubber Banded	Carton	
12 Hearts	Carton	

14 Hearts	Carton	
18X2 Zip Lock Heart (Trader Joe)	Carton	
22ct Hearts	Carton	
4X9 Hearts Cosco	Carton	
9ct Hearts	Carton	
9x2 1/2 Hearts	Carton	
Hearts	Carton	
Wholestalk Totes	Tote	
Lettuce		
Pack	UOM	Rate
Lettuce Liner	Carton	
Lettuce Wrap	Carton	

Radish		
Pack	UOM	Rate
IFCO 14 Count	Carton	
6 Dozen Regular	Carton	
3 Dozen Doublebunch	Carton	
6 Dozen UPC	Carton	
4 Dozen Doublebunch	Carton	
2 Dozen UPC	Carton	
2 Dozen Doublebunch	Carton	

Location	Commodity	Pack/Type	Payroll Rate	Rate per Carton
Salinas	Beets	6 ct		
Salinas	Beets	12 ct		
Salinas	Beets	25lb Poly Bags		
Salinas	Beets	950lb Short bin		
Salinas	Kholrabi	950lb Short bin		
Salinas	Bunch Spinach	12 ct		
Salinas	Bunch Spinach	24 ct		
Salinas	Bunch Spinach	Carton Loose		
Salinas	Cilantro	12 ct		
Salinas	Cilantro	16 ct Sleeve		
Salinas	Cilantro	16 ct SEALED Sleeve		

Salinas	Cilantro	24 ct Sleeve		
Salinas	Cilantro	24 ct SEALED Sleeve		
Salinas	Cilantro	24 ct OPEN Sleeve (Ocean Mist)		
Salinas	Cilantro	30 ct SEALED Sleeve		
Salinas	Cilantro	30 ct		
Salinas	Cilantro	30 ct Liner		
Salinas	Cilantro	30 ct Sleeve		
Salinas	Cilantro	60 ct		
Salinas	Cilantro	60 ct Liner		
Salinas	Cilantro	Totes Loose		
Salinas	Cilantro	RPC Loose		
Salinas	Cilantro	Carton Loose		
Salinas	End, Esc	12 ct		
Salinas	End, Esc	12 ct Liner		
Salinas	End, Esc	12 ct Scan		
Salinas	End, Esc	12 ct Sleeve		
Salinas	End, Esc	24 ct		
Salinas	End, Esc	24 ct GP		
Salinas	End, Esc	24 ct Scan		
Salinas	End, Esc	24 ct Liner		
Salinas	End, Esc	6 ct Liner		
Salinas	End, Esc	Totes Taylor		
Salinas	Fennel	12 ct		
Salinas	Fennel	12 ct Tags		
Salinas	Fennel	18ct		
Salinas	Fennel	24 ct		
Salinas	Kale	12 ct		
Salinas	Kale	24 ct		
Salinas	Kale	24 ct Liner		
Salinas	Kale	6 ct		
Salinas	Kale	Totes Loose		
Salinas	Kale	RPC Loose		
Salinas	Kale	Carton Loose		
Salinas	Kale	Freezer Bins (Chiala)		
Salinas	MIX	1 dz		
Salinas	MIX	1 dz Scan		
Salinas	MIX	12 ct Liner		
Salinas	MIX	15 ct RPC		
Salinas	MIX	18 ct		
Salinas	MIX	2 dz Scan		
Salinas	MIX	20# Tote		

Salinas	MIX	24 ct		
Salinas	MIX	24 ct Liner		
Salinas	MIX	24 ct Scan		
Salinas	MIX	24 ct Sleeve		
Salinas	MIX	24 ct Sleeve Red Romaine		
Salinas	MIX	4 x 6		
Salinas	MIX	6 x 4 pack Green Leaf (Jack in the Box)		
Salinas	MIX	6 ct Liner		
Salinas	MIX	30 ct Liner Green Romaine		
Salinas	MIX	32 ct Tote Ready Pack		
Salinas	MIX	36 ct Tote Taylor		
Salinas	MIX	36 ct Liner Dole		
Salinas	Napa, BC	15 ct		
Salinas	Napa, BC	15 ct scan		
Salinas	Napa, BC	25#		
Salinas	Napa, BC	30#		
Salinas	Napa, BC	50#		
Salinas	Napa, BC	60# WGA		
Salinas	Pars, IT Pars	12 ct		
Salinas	Pars, IT Pars	15 ct RPC		
Salinas	Pars, IT Pars	16 ct Sleeve		
Salinas	Pars, IT Pars	16 ct SEALED Sleeve		
Salinas	Pars, IT Pars	24 ct SEALED Sleeve		
Salinas	Pars, IT Pars	30 ct SEALED Sleeve		
Salinas	Pars, IT Pars	30 ct		
Salinas	Pars, IT Pars	30 ct Liner		
Salinas	Pars, IT Pars	30 ct Sleeve		
Salinas	Pars, IT Pars	60 ct		
Salinas	Pars, IT Pars	60 ct Liner		
Salinas	Pars, IT Pars	Totes Loose		
Salinas	Pars, IT Pars	RPC Loose		
Salinas	Pars, IT Pars	Carton Loose		
Salinas	Pars, IT Pars	2 x 5		
Salinas	Radishes	14 ct		
Salinas	Radishes	24s		
Salinas	Radishes	24s Double Bunch		
Salinas	Radishes	48s		