



COUNTY OF SAN DIEGO

BOARD OF SUPERVISORS

1600 PACIFIC HIGHWAY, ROOM 335, SAN DIEGO, CALIFORNIA 92101-2470

AGENDA ITEM

DATE: March 24, 2026

22

TO: Board of Supervisors

SUBJECT

ENHANCED PROTECTIONS FOR OUTDOOR CEMETERY WORKERS (DISTRICTS: ALL)

OVERVIEW

San Diego families turn to the cemetery industry in their most difficult moments. They trust the deceased will be treated with professionalism and their burial rites and traditions will be properly observed. Burial mistakes, negligence or malfeasance profoundly offend the bereaved and often wind up in court. Too often this is a consequence of the private cemetery industry putting families' peace of mind at risk through low-road employment practices for the outdoor cemetery workers who inter bodies, install headstones, and maintain the grounds.

The labor practices of private cemeteries in California have come under increasing scrutiny for allegations of negligence and abuse. Rose Hills Cemetery, a 1,400 acre property in Whittier, faces a \$15 million class action lawsuit alleging wage theft and denial of legally-required meal and rest breaks. The Catholic Archdiocese of Los Angeles recently settled a \$2.5 million case involving similar accusations, including unpaid overtime.ⁱ Poor wages and working conditions show up in the recruitment challenges facing the private cemetery industry. A 2024 survey by the National Funeral Directors Association found that recruiting qualified personnel was the industry's top challenge, while profitability placed fourth.ⁱⁱ

By cutting corners with their outdoor workers, private cemeteries increase the likelihood of incidents that undermine dignity in death. Greenwood Memorial Park and Mortuary in San Diego disclosed in 2023 that it misplaced the remains of Sidney Cooper, a black businessman who popularized Juneteenth in San Diego.ⁱⁱⁱ The Forest Lawn Cemetery in the Hollywood Hills was sued last year when the family learned their mother's headstone had been placed over the wrong burial plot.^{iv} In egregious cases, cemetery management takes advantage of groundskeepers' economic precarity and limited training to make unethical or illegal demands. Eden Memorial Park Cemetery, a Jewish cemetery in Los Angeles, settled an \$80.5 million class action for mass disturbances of graves. According to the lawsuit, groundskeepers were instructed

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to “secretly break concrete vaults with a backhoe and remove, dump and/or discard the human remains, including human skulls, to make room for new interments.”^v

Burial incidents like these take years to be discovered, if discovered at all, and only through the courage of whistleblowers. In the Forest Lawn Cemetery case, the family learned of the mistake when a cemetery worker pulled the family aside. Families have no other way to verify that their loved ones have been buried properly. Yet economic precarity and a lack of workplace protections act as a powerful disincentive to whistleblowing for outdoor cemetery workers.

Today’s item takes a step toward safeguarding dignity in death by raising labor standards and enhancing whistleblower protections for outdoor workers in private cemeteries that are actively accepting new burials, interments, or memorializations. By raising the wage and benefits floor and tightening oversight, the County can encourage private cemetery operators to invest in training and retaining a quality workforce. And by strengthening whistleblower protections, the County can encourage incidents to come to light so families can seek the redress their loved ones deserve.

RECOMMENDATIONS

CHAIR TERRA LAWSON-REMER AND CHAIR PRO TEM PALOMA AGUIRRE

1. Direct the Chief Administrative Officer to return to the Board within 90 days with a draft ENHANCED PROTECTIONS FOR OUTDOOR CEMETERY WORKERS ordinance as outlined in this Board Letter and modeled on the attached Draft Ordinance. The final ordinance shall only apply to private cemeteries in the unincorporated areas that conduct ten or more burials, interments, or memorializations per year and include the following:
 - a. A \$2530.55 per hour minimum wage ~~and fringe benefits at the prevailing health and welfare fringe rate under the Federal Service Contract Act~~ for direct and subcontracted outdoor cemetery workers, with an exemption for workers covered by valid collective bargaining agreements with terms dictating wages and benefits.
 - b. Enforcement mechanisms, including recordkeeping requirements and penalties
 - c. Whistleblower protections for reporting violations of labor law or any other laws and regulations governing private cemeteries.
 - d. Notice and posting requirements.

EQUITY IMPACT STATEMENT

Today’s action promotes equity by raising the floor on wages, benefits, and working conditions for a marginal workforce in the San Diego region. This will help to improve living standards for low-wage workers and reduce reliance on the County safety net.

SUSTAINABILITY IMPACT STATEMENT

N/A

FISCAL IMPACT

Funds for this request are included in the Fiscal Year 2025-26 Operational Plan based on existing staff time in the Office of Labor Standards Enforcement funded by existing General Purpose Revenue. There will be no change in net General Fund cost and no additional staff years. There

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may be fiscal impacts associated with future related recommendations for implementation and enforcement, which staff would return to the Board for consideration and approval.

BUSINESS IMPACT STATEMENT

By establishing workforce standards that foster better retention, compliance, and whistleblower practices, today's action serves to deter bad actors in the private cemetery business. The scope of today's action is limited to private cemeteries in the unincorporated areas that conduct ten or more burials annually; mall cemeteries, legacy cemeteries and cemeteries that only accept burials under exceptional circumstances will be exempt.

ADVISORY BOARD STATEMENT

N/A

BACKGROUND

San Diego families turn to the cemetery industry in their most difficult moments. They trust the deceased will be treated with professionalism and their funereal rites and traditions will be properly observed. Burial mistakes, negligence or malfeasance profoundly offend the bereaved and often wind up in court. Too often this is a foreseeable consequence of the private cemetery industry putting families' peace of mind at risk through low-road employment practices for the outdoor cemetery workers who inter bodies, install headstones, and maintain the grounds.

The labor practices of private cemeteries in California have come under scrutiny recently for allegations of negligence and abuse. Rose Hills Cemetery, a 1,400 acre property in Whittier, faces a \$15 million class action lawsuit alleging wage theft and denial of legally-required meal and rest breaks. The Catholic Archdiocese of Los Angeles recently settled a \$2.5 million case involving similar accusations, including unpaid overtime.^{vi} Poor wages and working conditions show up in the recruitment challenges facing the private cemetery industry. A 2024 survey by the National Funeral Directors Association found that recruiting qualified personnel was the industry's top challenge, while profitability placed fourth.^{vii}

The private cemetery industry no longer consists just of small family businesses operating on shoestring budgets with informal timekeeping and compliance practices. Large, sophisticated cemetery chains and private equity firms have been rolling up the death care industry in expectation of future growth from population aging. In 2022, nearly a billion dollars of mergers and acquisitions took place, the busiest year for consolidation since 2004.^{viii} Both the Glenn Abbey Cemetery and the Eden Memorial Park Cemetery mentioned above are owned by Service Corporation International, a publicly-traded company with a market capitalization of \$11.5 billion which owns over 1,900 cemeteries and funeral homes.^{ix}

The emergence of large cemetery chains and private equity has brought professional management and increased profitability to the cemetery industry.^x The Funeral Consumers Alliance compared funeral services pricing before and after acquisitions by large players and found a pattern of price hiking. For example, when Service Corporation International purchased the Lakeshore Mortuary in Mesa, Arizona burial prices increased 32% from \$2,795 to \$3,680.^{xi} Large cemetery operators have the capacity to responsibly employ outdoor cemetery workers.

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By cutting corners with their outdoor workers, private cemeteries increase the likelihood of incidents that undermine dignity in death. Greenwood Memorial Park and Mortuary in San Diego disclosed in 2023 that it misplaced the remains of Sidney Cooper, a black businessman who popularized Juneteenth in San Diego.^{xii} The Forest Lawn Cemetery in the Hollywood Hills was sued last year when the family learned their mother’s headstone had been placed over the wrong burial plot.^{xiii} In egregious cases, cemetery management takes advantage of groundskeepers’ economic precarity and limited training to make unethical or illegal demands. Eden Memorial Park Cemetery, a Jewish cemetery in Los Angeles, settled an \$80.5 million class action for mass disturbances of graves. According to the lawsuit, groundskeepers were instructed to “secretly break concrete vaults with a backhoe and remove, dump and/or discard the human remains, including human skulls, to make room for new interments.”^{xiv}

Burial incidents like these take years to be discovered, if discovered at all, and only through the courage of internal whistleblowers. Families have no other way of verifying that their loved ones have been buried properly. In the Forest Lawn Cemetery case, the family only learned of the mistake because a cemetery worker pulled the family aside. Yet for outdoor cemetery workers, economic precarity and a lack of workplace protections act as a powerful disincentive to whistleblowing.

Today’s item takes a step toward safeguarding dignity in death by raising labor standards and enhancing whistleblower protections for outdoor workers in active private cemeteries, defined as private cemeteries that conduct ten or more burials, interments, or memorializations annually. By raising the wage and benefits floor and tightening oversight, the County can encourage private cemetery operators to invest in training and retaining a quality workforce. And by strengthening whistleblower protections, the County can encourage cemetery workers to come forward so families can seek the redress their loved ones deserve.

LINKAGE TO THE COUNTY OF SAN DIEGO STRATEGIC PLAN

Today’s proposed action to enhance protections for outdoor workers in private cemeteries supports the Equity, and Community initiatives in the County of San Diego’s 2026-2031 Strategic Plan by protecting dignity in death and addressing economic precarity facing outdoor cemetery workers.

Respectfully submitted,



TERRA LAWSON-REMER
Supervisor, Third District



PALOMA AGUIRRE
Supervisor, First District

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ATTACHMENT(S)

Attachment A – Draft Ordinance

- [Preliminary Approval Given for \\$2.47 Million Cemetery Worker Settlement - MyNewsLA.com](#)
- ii [4f4df085-a39f-4587-9ffa-e8f075029477.pdf](#)
- iii [Family suing San Diego cemetery after remains of Juneteenth trailblazer missing from burial plot | AP News](#)
- iv [Family sues a Hollywood Hills cemetery for placing mother’s headstone over wrong grave | KTLA](#)
- v [Los Angeles Jewish Cemetery Sued for Dumping Bodies — Again – The Forward](#)
- vi [Preliminary Approval Given for \\$2.47 Million Cemetery Worker Settlement - MyNewsLA.com](#)
- vii [4f4df085-a39f-4587-9ffa-e8f075029477.pdf](#)
- viii [Deathcare M&A hits two-decade high - ION Analytics](#)
- ix [Service Corp. International InvestorRoom - Stock Information](#)
- x [Death Is Anything but a Dying Business as Private Equity Cashes In - KFF Health News](#)
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- xii [Family suing San Diego cemetery after remains of Juneteenth trailblazer missing from burial plot | AP News](#)
- xiii [Family sues a Hollywood Hills cemetery for placing mother’s headstone over wrong grave | KTLA](#)
- xiv [Los Angeles Jewish Cemetery Sued for Dumping Bodies — Again – The Forward](#)