



COUNTY OF SAN DIEGO

BOARD OF SUPERVISORS

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

AGENDA ITEM

DATE: October 21, 2025

21

TO: Board of Supervisors

SUBJECT

IMPROVING SAFETY AND LABOR STANDARDS IN COUNTY PARKS (DISTRICTS: ALL)

OVERVIEW

Every year, entertainment events vendors employ hundreds of stagehands to build and break down stages, rig lighting and amplification systems, and move heavy-duty equipment at large revenue-generating events in County of San Diego (County) parks, work that can turn deadly when safety corners are cut. On October 30, 2024, for example, a stagehand from Texas employed by James Thomas Productions out of Manhattan Beach died during loading at an outdoor music festival in Orlando.ⁱ James Thomas Productions had already been fined twice by the Occupational Safety and Health Administration for exposing workers to fall hazards and contributing to the death of a rigger in a 35-foot fall before the Super Bowl. In 2019, a rigger from San Diego, Christopher Griffin, fell to his death while setting up for Coachellaⁱⁱ, and a stagehand at the BottleRock music festival in Napa Valley was crushed by a metal beam during tear down in 2016.ⁱⁱⁱ Many serious but non-fatal stagehand injuries from trips, falls, crushing, and electrocution go unreported.

Stagehands take on real risk to make our region's cultural life possible yet too often they work in a system stacked against them. The freelance nature of the industry leaves workers with little power to speak up when safety corners are cut or wages are stolen. Some entertainment events vendors have been accused of falsifying safety certifications, recruiting out-of-state workers for lower pay, and failing to provide basic safety equipment. When workers are forced to choose between their safety and their next paycheck, it's a public safety failure waiting to happen.

Large revenue-generating events in County parks can employ well over 100 stagehands each and generate millions of dollars for the County annually. Event producers are permitted to hold roughly twelve such events—known as “higher impact” events—in County parks each year. Higher impact events can attract up to 15,000 attendees in a single day and include marquee music festivals such as CRSSD Festival and Boots in the Park as well as major fundraisers such as the Susan G. Komen Foundation's Three-Day Walk. Higher impact events contribute to the

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cultural vitality of the San Diego region and stimulate the local economy by creating thousands of live event jobs, drawing customers into nearby businesses, and generating approximately \$1.75 million in annual revenue for the County's Waterfront Park Trust Fund, which helps cover operations, maintenance, and capital improvements at the foremost waterfront open space in downtown San Diego.

County oversight of safety and labor standards for contracted stagehands has significant gaps. Current compliance largely relies on paperwork: reviewing safety certifications prior to permit issuance and investigating violations only in response to complaints. There is no onsite verification that certified workers are actually the ones doing the job; no onsite monitoring of event staging to alert the Department of Parks and Recreation (DPR) to unsafe practices; no onsite notifications of workers' rights and avenues for redress; and no labor standards beyond compliance with State and local law. As a result, violations of Board policy, safety lapses, and labor abuses on County property may go unaddressed.

The State of California recently took up the issue of workplace safety in public venues and established higher safety standards than current County policy. The County requires all electricians, portable power distribution technicians, arena rigging, and theater rigging employees and associated vendors and subcontractors to be certified under the Entertainment Technician Certification Program (ETCP) and the OSHA 10-hour safety training program (OSHA-10). With Assembly Bill 1775, the State of California required either that all department heads/leads have completed the OSHA 30-hour safety training program (OSHA-30) and ETCP, or all stage employees meet the conditions for a skilled and trained workforce.

Today's item seeks to raise safety standards in line with the State of California, establish minimum labor standards, and strengthen oversight and enforcement to ensure that higher impact events in County parks are safe and fair. It directs the Chief Administrative Officer (CAO) to incorporate the added safety requirements in Assembly Bill 1775 into higher impact event regulations and establish stricter safety oversight procedures. It sets labor standards for stagehands in line with peer venues in the region, consisting of a \$25 hourly minimum wage and benefits, and encourages local hiring. And it directs the CAO to develop an administrative ordinance that provides the County's Office of Labor Standards and Enforcement the tools it needs to enforce the new labor standards.

This item will make County events safer for stagehands, eventgoers, and the public, while holding entertainment events vendors accountable to basic labor and safety standards. By ensuring stagehands are paid fairly and protected on the job, we can make sure that the revenues generated by event producers from County assets flow back to San Diegans in the form of good local jobs. And by improving the quality of stagehand jobs at higher impact events, the County is doing its part to sustain the skilled entertainment workforce San Diego needs to attract world-class live events as well as television and film production.

RECOMMENDATION(S)

CHAIR LAWSON-REMER AND SUPERVISOR AGUIRRE

1. Direct the Chief Administrative Officer to add California Assembly Bill 1775 (Labor Code section 9250, et seq.) certification requirement 9251(a)(2) to higher impact event

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regulations and develop a process, in consultation with the Office of Labor Standards and Enforcement, for onsite audits of safety compliance and notifying stage crews of their labor rights and avenues for redress.

- a. The process should also authorize the Office of Labor Standards and Enforcement to allow independent 3rd party organizations with expertise in workers' rights and live event safety to monitor the set-up, operation, and tear down of higher impact County event staging onsite and document workplace safety concerns for the Department of Parks and Recreation for consideration in future permitting decisions.
2. Direct the Chief Administrative Officer to establish minimum labor standards for direct and subcontracted employees of entertainment events vendors involved in the set-up, operation, and tear down of higher impact event staging at County-owned and leased parks:
 - a. Entertainment events vendors must pay direct and subcontracted stage crews a minimum wage of \$25 an hour.
 - b. Entertainment events vendors must provide health and retirement benefits for direct and subcontracted stage crews through a portable benefits plan covered by the Employee Retirement Income Security Act (ERISA) or by paying fringe benefits at the prevailing health and welfare fringe rate under the Federal Service Contract Act.
 - c. Entertainment events vendors must make a good faith effort to fill stage crew jobs with qualified San Diego County residents.
 - i. The County shall assist entertainment event vendors in meeting their good faith requirement by establishing a mechanism for voluntary referrals to local labor organizations that maintain registries of properly skilled and certified entertainment events workers in San Diego County.
3. Direct the Chief Administrative Officer to return to the Board within 120 days with an administrative ordinance empowering the Office of Labor Standards and Enforcement to enforce labor standards at higher impact events in County-owned and leased parks. The ordinance should include tools for conducting investigations, issuing penalties, and awarding damages for wage theft. The report back should also assess the feasibility of, and if appropriate, provide recommendations for, establishing a dedicated staff position to carry out enforcement duties. This assessment should outline the proposed scope, role, and responsibilities of the position, as well as the classification most suitable to support the department's mission.

EQUITY IMPACT STATEMENT

Raising safety standards, establishing minimum labor standards, and fostering compliance at higher impact events in County-owned and leased parks will bring job quality and live event safety in line with high road peer venues and discourage abusive labor practices in the local entertainment events industry. In so doing, the County expands economic opportunity for local entertainment workers and protects a vulnerable workforce from exposure to unsafe working conditions.

SUSTAINABILITY IMPACT STATEMENT

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Raising safety standards, establishing minimum labor standards, and fostering compliance at higher impact events in County-owned and leased parks advances the County's Sustainability goals by reducing poverty and promoting economic sustainability within the live events industry. It also reduces the likelihood that entertainment workers, performers, and attendees at county-sanctioned events on county property will experience a serious accident, thereby protecting the health of the community.

FISCAL IMPACT

Funds for the actions requested are included in the Fiscal Year 2025-26 Operational Plan based on existing staff time in the Office of Labor Standards and Enforcement. There will be no change in net General Fund cost and no additional staff years. There may be fiscal impacts associated with future related recommendations, which staff would return to the Board for consideration and approval.

BUSINESS IMPACT STATEMENT

Today's item levels the playing field for entertainment events vendors and discourages unfair competition from low road employers. In addition, it keeps more of the revenue generated by event producers from County assets within the local economy in the form of good jobs while also bolstering entertainment and events business by supporting a skilled local entertainment workforce.

ADVISORY BOARD STATEMENT

N/A

BACKGROUND

The County of San Diego operates 159 park facilities, providing recreational opportunities for hundreds of thousands of San Diego's children, families, and visitors each year. In addition, the County permits event producers to hold roughly 12 large revenue-generating events known as "higher impact" events in County-owned and leased parks every year. Higher impact events can attract up to 15,000 attendees in a single day and include marquee music festivals such as CRSSD Festival and Boots in the Park as well as major fundraisers such as the Susan G. Komen Foundation's Three-Day Walk. Higher impact events contribute to the cultural vitality of the San Diego region and stimulate the local economy by creating hundreds of local jobs, drawing customers into nearby businesses, and generating approximately \$1.75 million in annual revenue for the County's Waterfront Park Trust Fund which funds operation, maintenance, and capital improvements at the foremost waterfront open space in downtown San Diego.

Workplace safety at higher impact events is a serious issue. Large events utilize heavy duty audiovisual equipment, electrical systems, and staging which creates the risk of serious accidents, especially at outdoor venues under unpredictable weather conditions. On October 30, 2024 a stagehand from Texas employed by James Thomas Productions out of Manhattan Beach died during loading at an outdoor music festival in Orlando.^{iv} James Thomas Productions had already been fined twice by the Occupational Safety and Health Administration for exposing workers to fall hazards and contributing to the death of a rigger in a 35-foot fall before the Super Bowl. In 2019, a rigger from San Diego, Christopher Griffin, fell to his death while setting up for Coachella^v, and a stagehand at the BottleRock music festival in Napa Valley was crushed by a

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metal beam during tear down in 2016.^{vi} Many serious but non-fatal stagehand injuries from trips, falls, crushing, and electrocution go unreported.

On November 3, 2021, the Board identified the safety of entertainment workers, performers, and the public at higher impact events as a concern and required all electricians, portable power distribution technicians, arena rigging, and theater rigging employees and associated vendors and subcontractors to be certified under the Entertainment Technician Certification Program (ETCP) and the OSHA 10-hour safety training program (OSHA-10). The State of California subsequently took up the issue of workplace safety at live events in public venues and established higher safety standard than current Board policy in certain respects. Enacted in 2022, AB 1775 defined an entertainment events vendor as a private employer, including subcontracted employers, that contract to set up, operate, or tear down live event staging. AB 1775 requires all employees of entertainment events vendors involved in setting up, operating, or tearing down live event staging to have OSHA-10 certifications. AB 1775 (Labor Code section 9250, et seq.) further requires either that all department heads/leads have OSHA 30-hour safety training program (OSHA-30) and ETCP certifications or all direct and subcontracted employees meet the conditions for a skilled and trained workforce. Today's item incorporates the State of California's higher safety standards into County policy.

In addition to workplace safety, labor practices in the live events industry are a perennial concern due to its largely freelance workforce. Entertainment events vendors, who contract with event promoters to handle staging and stagehand staffing, tend to be smaller operators whose profitability depends on cutting labor costs. Low-road entertainment events vendors have been alleged to submit straw names for safety certifications, recruit low-wage workers from out-of-state, pressure workers into cutting corners on safety, steal wages, and fail to provide proper safety equipment. As freelance workers are always in search of their next gig, many stagehands feel they cannot walk away from a bad job or take recourse when their rights are violated.

Current Board policy sets no labor standards beyond compliance with state and local laws, despite the fact that higher impact events in County-owned and leased parks generate hundreds of jobs a year, with the largest employing well over 100 workers in setting up, operating, and tearing down event staging alone. The County is a local outlier in this respect. Pechanga Arena, the San Diego Convention Center, Rady Shell, Snapdragon Stadium, and many more venues in the region have agreements in place that set standards for wages and working conditions that surpass state and local law. The City of San Diego passed the Hospitality Minimum Wage Ordinance, which phases in a \$25 minimum wage tied to inflation for all hospitality workers—not just skilled stage crews—at amusement parks, event centers, and zoos. Petco Park would fall under the San Diego ordinance. Pechanga Arena, a 16,000-seat venue owned by the City of San Diego and operated by venue management company AEG, pays stage crews a minimum of \$28 an hour, with higher rates for skilled crafts and supervisory roles. In addition, the Pechanga agreement includes overtime and hazard pay provisions, a 12% fringe for health and welfare benefits, a 14% fringe for retirement benefits, minimum staffing requirements, rest and meal breaks, scheduling protections, guaranteed minimum hours, requirements for safety equipment, and workplace grievance procedures. Current Board policy for higher impact events in County-owned and leased parks requires none of these.

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Establishing minimum labor standards for entertainment events vendor stage crews will help ensure that more of the revenues generated by events producers from the use of County property flow back to San Diegans in the form of good local jobs. And by improving the quality of hundreds of stage crew jobs, the County is doing its part to sustain the skilled entertainment workforce San Diego needs to attract world-class live events as well as television and film production. The 2023 Creative Economy Report commissioned by the City of San Diego found that entertainment and events contributed nearly \$3 billion to the regional economy and are among the fastest growing segments of San Diego's creative economy.⁸ With the announcement of the partnership between the City of Chula Vista and the Chula Vista Entertainment Complex to create a 90,000 square foot sound stage, the demand for a skilled entertainment workforce will only expand.⁹ Today's item will help entertainment workers build careers and lives here in San Diego and bolster San Diego county's reputation as a premier entertainment and events destination.

Minimum labor standards at higher impact events in County-owned and leased parks must include:

- Minimum Wage: \$25 per hour — The 2023 Creative Economy Report commissioned by the City of San Diego identified the high cost of living as the number one concern among creative workers. The MIT Cost of Living Calculator estimates a living wage for a San Diego worker in a two-income household with one child to be \$29.06 per hour.¹⁰ Pay for creative workers does not fully cover the cost of living in San Diego county, deprofessionalizing the entertainment workforce and causing talent loss to other regions and industries. The State of California took a step toward addressing unlivable wages in the health care industry by phasing in a \$25 an hour minimum wage for health care workers. The City of San Diego recently passed the Hospitality Minimum Wage Ordinance, which establishes a \$25 minimum wage tied to inflation for all hospitality workers—not just skilled stage crews—at amusement parks, event centers, and zoos. By establishing a \$25 minimum wage for skilled stage crews, the County will help foster a competitive wage in a strategically important segment of San Diego's creative economy.
- Fringe Benefits: ERISA Portable Benefits Plan or Federal Service Contract Act Prevailing Fringe Rate — Respondents to the 2023 Creative Economy Report also cited the lack of fringe benefits, particularly health and retirement benefits, as a major challenge. Lack of access to benefits is especially acute in the live events industry with its largely freelance workforce and small employers. Offering an ERISA portable benefits plan such as a multiemployer plan is a cost-effective and secure way to guarantee freelance stage crews benefits coverage. While non-ERISA portable benefits plans are becoming more common, particularly in gig work industries, there are serious concerns about their adequacy. DoorDash's non-ERISA portable benefits plan, for example, offers 4% on delivery workers' pre-tip earnings which averages just \$7 per week.^{vii} In the absence of an ERISA portable benefits plan, entertainment events vendors may pay stage crews an in-lieu fee pegged to the US Department of Labor's annual prevailing health and welfare benefit rate determination under 29 C.F.R. §4.52 of the McNamara-O'Hara Service Contract Act. Aligning the minimum fringe benefits with the Federal Service Contract Act rate determination has the advantages of being easily administrable and

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responsive to year-on-year changes in the cost of benefits. The 2025 prevailing health and welfare fringe benefit rate determination is \$5.55 per hour.^{viii}

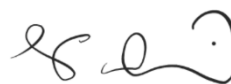
- Good Faith Local Hire Effort — Local hire is a common provision in federally-funded public works projects and help to ensure that their benefits flow back to the communities where they take place, develop the local workforce, and create job opportunities for local workers who may otherwise be overlooked. Requiring entertainment events vendors at higher impact events to make a good faith effort to recruit stagehands based in San Diego will reduce reliance on low-wage out-of-state workers and ensure that the hundreds of contracted stage crew jobs generated by higher impact events sustain the careers of San Diego's entertainment workforce. The County can facilitate the recruitment of local stage crews by providing a voluntary referral service to local labor organizations that maintain registries of skilled and certified stage crews. It is a well-established practice in many gig work industries such as construction and entertainment for employers to turn to labor organizations for help identifying qualified workers and helps to strengthen labor standards by providing another channel for workers to access information and redress in cases of abusive labor practice.

To foster compliance with safety and labor standards at higher impact events, today's item directs the Chief Administrative Officer to implement onsite safety oversight, notify entertainment event workers of their rights and redress mechanisms, and develop an administrative ordinance that empowers OLSE to investigate labor violations, issue penalties, and award damages. Current compliance practice involves reviewing safety certifications prior to permit issuance and investigating violations in response to complaints. There are no onsite audits to verify that the stage crew doing the work matches the submitted names of certification holders, the County does not require entertainment events vendors to notify workers of their rights and OLSE lacks the tools to vindicate workers' rights. As a result, entertainment events vendor workers are unlikely to file complaints and violations of Board policy may go undetected. In addition, there is no monitoring of the set-up, operation, and tear down of higher impact events to ensure that best safety practices are being followed. To redress this safety compliance gap, today's item authorizes OLSE to allow an independent 3rd party organization with expertise in live event safety and workers rights to monitor stage crew safety practices onsite and document workplace safety concerns for DPR to consideration in future permitting decisions.

LINKAGE TO THE COUNTY OF SAN DIEGO STRATEGIC PLAN

Today's proposed action to improve safety and labor standards at higher impact events in County-owned and leased parks supports the Sustainability, Equity, and Community initiatives in the County of San Diego's 2025-2030 Strategic Plan by enhancing event safety, addressing economic precarity, and creating opportunity for San Diego's entertainment workforce.

Respectfully submitted,



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TERRA LAWSON-REMER
Chair, Third District

PALOMA AGUIRRE
Supervisor, First District

ATTACHMENT(S)
N/A

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- ⁱ [OSHA is investigating the death of a stagehand at Camping World Stadium ahead of EDC](#)
ⁱⁱ [Worker who died setting up Coachella stage in Indio identified as San Diego man Christopher Griffin | cbs8.com](#)
ⁱⁱⁱ [Worker crushed to death dismantling BottleRock Napa Valley stage – Sonoma Index-Tribune](#)
^{iv} [OSHA is investigating the death of a stagehand at Camping World Stadium ahead of EDC](#)
^v [Worker who died setting up Coachella stage in Indio identified as San Diego man Christopher Griffin | cbs8.com](#)
^{vi} [Worker crushed to death dismantling BottleRock Napa Valley stage – Sonoma Index-Tribune](#)
^{vii} <https://www.nelp.org/insights-research/why-workers-need-real-portable-benefits>
^{viii} [Department of Labor - Introduction To SF98 | U.S. Department of Labor](#)