



COUNTY OF SAN DIEGO

AGENDA ITEM

BOARD OF SUPERVISORS

PALOMA AGUIRRE
First District

JOEL ANDERSON
Second District

TERRA LAWSON-REMER
Third District

MONICA MONTGOMERY STEPPE
Fourth District

JIM DESMOND
Fifth District

DATE: February 10, 2026, and March 03, 2026

11

TO: Board of Supervisors

SUBJECT

ADOPT AN ORDINANCE TO ADD CHAPTER 28 TO DIVISION 1 OF TITLE 2 LICENSES, BUSINESS REGULATIONS, AND BUSINESS TAXES OF THE COUNTY CODE OF REGULATORY ORDINANCES RELATING TO IMPROVING SAFETY AND LABOR STANDARDS IN COUNTY PARKS (2/10/26 – First Reading; 3/3/26 - Second Reading unless ordinance is modified on second reading) (DISTRICTS: ALL)

OVERVIEW

On November 3, 2021 (05), the County of San Diego (County) Board of Supervisors (Board) adopted a Resolution requiring the County Department of Parks and Recreation (DPR) through existing reservation and event agreements, to ensure that all entertainment vendors at DPR facilities have completed the Entertainment Technician Certification Program (ETCP) and a 10-hour Occupational Safety and Health Administration (OSHA) safety awareness course or equivalent. Subsequently, on October 21, 2025 (21), the Board directed the Chief Administrative Officer (CAO) to explore the feasibility of establishing a local labor enforcement mechanism for higher impact events held on County-owned and leased park property, to support implementation and compliance with Board adopted labor standards, including minimum wage requirements, and to return to the Board within 120 days with a draft ordinance, through the Office of Labor Standards and Enforcement (OLSE).

This action is in response to a national trend in which large-scale commercial events held on public property generate economic activity but may also present heightened safety and labor compliance risks. Temporary and subcontracted workers, stagehands, and production crews often work in fast-paced environments with limited oversight. Without local enforcement, violations such as unpaid wages and unsafe conditions can go unaddressed, risking the safety and well-being of workers and attendees.

In partnership with organizations supporting entertainment professionals, OLSE identified measures the County could implement to ensure events held on County-owned and leased park property reflect the County's values, promote safe workplaces, and ensure responsible management of public spaces. The proposed ordinance establishes enforceable labor standards for high-impact events, including a \$25 minimum hourly wage for entertainment workers with annual cost-of-living adjustments based on state minimum wage increases. These requirements apply to technicians, stagehands, and other event-based workers engaged directly through subcontractors

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to perform setup, operation, or teardown of production elements such as staging, lighting, and sound as set forth by California State Labor Code Division 5, Part 14, Section 9251

This ordinance would also authorize OLSE to investigate complaints, issue penalties, and promote compliance through education and outreach. Additionally, it establishes a dedicated staff position to ensure consistent enforcement and coordination between OLSE and DPR.

Today’s request is for the Board to approve the introduction of an ordinance adding Chapter 28 to Division 1 of Title 2 Licenses, Business Regulations, and Business Taxes of the County Code of Regulatory Ordinances, establishing clear safety and labor standards for entertainment and live events on County-owned and leased park property. If approved, the ordinance will be scheduled for adoption on March 03, 2026. If the proposed ordinance is modified on February 10, 2026, then, on that date, a subsequent meeting date will be selected for the ordinance’s adoption.

RECOMMENDATION(S)
CHIEF ADMINISTRATIVE OFFICER

On February 10, 2026:

1. Consider the recommendation to approve the introduction of the Ordinance (first reading):

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If, on February 10, 2026, the Board takes action as recommended on item #1 above, then on March 03, 2026:

1. Consider and adopt the Ordinance (second reading):

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2. If the Board acts on Recommendation #1 above:
 - a. Refer to Fiscal Year (FY) 2026-27 budget deliberations the establishment of appropriations of \$165,000 in the Chief Administrative Office, Office of Labor Standards and Enforcement for one staff year (1.0 FTE) for administering and enforcing safety and labor standards at County-owned and leased park facilities based on General Purpose Revenue. Active enforcement of the ordinance and

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program implementation will be contingent upon the successful addition of the position in the Operational Plan.

3. Direct the Chief Administrative Officer to report back on the status of the Improving Safety and Labor Standards in County Parks Program established in the Office of Labor Standards and Enforcement, including development of regulations on how funds will be collected if penalties are administered.

EQUITY IMPACT STATEMENT

Improving safety and labor standards in County parks directly advances the County’s commitment to equity, inclusion, and worker well-being. By setting clear minimum labor standards and requiring compliance with established safety practices, the proposed ordinance promotes equitable treatment across all event workers, regardless of employment status or employer type.

SUSTAINABILITY IMPACT STATEMENT

This action strengthens the long-term sustainability of the region’s live events ecosystem by promoting responsible labor practices, community safety, and operational integrity within County-owned and leased park property. Sustainable governance is not only environmental but also includes ensuring that economic systems and workplaces function safely and equitably over time. By embedding fair labor standards and safety requirements into the administration of County-owned and leased park property, the County helps create a self-sustaining model in which event organizers, vendors, and workers all benefit from predictable expectations and reduced risks. These measures contribute to a stable, skilled, and safety-conscious workforce, decreasing turnover and supporting the resilience of both the local events industry and the broader community that depends on it.

FISCAL IMPACT

There is no fiscal impact for FY 2025-26. If Recommendation 2a is approved on March 3, 2026, there will be ongoing costs and revenue of approximately \$165,000 that will be referred to FY 2026-27 budget deliberations in the Chief Administrative Office, Office of Labor Standards and Enforcement for one staff year for administering and enforcing safety and labor standards at County-owned and leased park facilities based on General Purpose Revenue. For the Department of Parks and Recreation, any decrease in special events could provide less revenue and potentially impact park operations and programming.

BUSINESS IMPACT STATEMENT

Today’s action establishes equitable standards for entertainment event vendors, and discourages unfair competition from low-road employers by setting clear and consistent safety and labor standards for County-owned and leased park properties. These standards promote responsible business practices that protect workers and ensure that all contractors operate under equitable conditions. By establishing a more predictable and transparent operating environment, the

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ordinance helps retain more of the economic impact generated from events on County-owned and leased park property within the local economy, supporting good jobs, fair wages, and a skilled entertainment workforce. In doing so, the County strengthens the regional events industry, fosters high-quality vendor performance, and reinforces its role as a fair and accountable public partner to the business community.

ADVISORY BOARD STATEMENT

N/A

BACKGROUND

The County of San Diego’s (County) parks and public venues are vibrant community assets, serving as gathering places, cultural landmarks, and drivers of economic vitality. With 159 park facilities hosting hundreds of events annually, including a dozen large-scale, revenue-generating “higher-impact” events, these concerts, festivals, and fundraisers contribute significantly to San Diego’s creative economy. Collectively, they generate over \$1.75 million each year to support County park operation and maintenance, while enriching the cultural fabric of our region.

The County has long demonstrated its commitment to responsible stewardship of public spaces and leadership in worker protection. In 2021, the Board of Supervisors (Board) took proactive steps to require specialized safety training and certifications for entertainment technicians at higher-impact events. The State of California later strengthened these requirements through Assembly Bill 1775 (2022; Labor Code § 9250 et seq.). While State law establishes baseline safety requirements, local governments remain responsible for ensuring compliance within their own facilities and contracts.

As the County continues to welcome events that bring joy, connection, and opportunity to our communities, we must also recognize and address the unique risks these events pose to workers and public safety. The setup and teardown of large stages, lighting rigs, and sound systems require skilled technical labor under tight timelines and often unpredictable outdoor conditions. Nationwide, preventable tragedies in the live events industry have revealed systemic gaps in oversight, including inadequate safety training, falsified certifications, and weak accountability for labor violations. These risks fall most heavily on entertainment workers who are employed in temporary, event-based, and subcontracted roles. These workers often come from diverse backgrounds and face wage theft, unsafe conditions, and limited access to workplace protections. When contractors cut corners, the consequences include underpaying workers, ignoring safety protocols, or falsifying certifications, and unfair competition for responsible businesses. Without a clear enforcement mechanism, these violations frequently go unreported.

In response to these concerns, on October 21, 2025 (21), the Board directed the Chief Administrative Officer (CAO) to explore the feasibility of establishing a local labor enforcement mechanism for higher impact events held on County-owned and leased park property, through the

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Office of Labor Standards and Enforcement (OLSE) and return to the Board in 120 days with a draft ordinance.

The proposed ordinance adds a new chapter to the County Code of Regulatory Ordinances to formalize safety and labor standards for higher-impact events held on County-owned and leased park property. These standards will help prevent exploitative contracting practices and reinforce the County’s leadership in fair and responsible labor standards. As part of these standards, the ordinance establishes a \$25 minimum wage requirement with annual cost-of-living adjustments based on state minimum wage increases for entertainment workers who are hired directly or through subcontractors to perform setup, operation, and/or teardown of production elements such as staging, lighting, and sound.

The ordinance also confers authority on the Office of Labor Standards and Enforcement (OLSE) to investigate potential violations, issue administrative penalties, and facilitate remedies for affected workers. The ordinance designates a dedicated full-time staff position within OLSE to oversee implementation, conduct compliance reviews and investigations, and coordinate with the Department of Parks and Recreation and County Counsel.

Embedding these standards into the Code of Regulatory Ordinances elevates them from policy to law, ensuring continuity, consistency, and transparency in enforcement. By institutionalizing these safeguards, the County reaffirms that its parks are not only places of recreation and economic opportunity, but also models of equity, safety, and high-road employment.

This ordinance represents a meaningful step in aligning the County’s operations with its broader goals of protecting worker rights, sustaining a skilled local workforce, and ensuring that public spaces reflect the values of fairness, accountability, and community well-being.

Improving Safety and Labor Standards at High Impact Events Held on County-Owned and Leased Park Property

This ordinance establishes the labor, safety, and compliance framework for higher-impact events held on County-owned and leased park property. It implements [AB 1775](#) (Labor Code §9250 et seq.), ensures fair wages and benefits, protects local workers, and reduces hazardous conditions during setup, operation, and teardown of live-event staging.

This ordinance creates shared accountability among entertainment events vendors, vendors, and subcontractors; establishes pre-event requirements; mandates on-site safety and labor oversight; and provides an enforcement structure administered by OLSE. Covered parties include any entity that employs, directs, supervises, hosts, or contracts for stage crew performing covered work. All such entities may be jointly and severally liable for compliance with safety, wage, benefit, local-hire, recordkeeping, notice, and anti-retaliation requirements.

Pre-Event Contract Requirements

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To protect workers and ensure compliance with California labor standards, the entertainment events vendor or host is required to submit comprehensive labor-compliance documentation to OLSE. This includes a detailed crew plan and roster identifying all stage positions, a safety plan addressing onsite working conditions, and a local hire plan demonstrating efforts to employ workers from the surrounding community. These materials allow OLSE to verify that labor standards are clearly established prior to the event and properly implemented during event operations.

As part of these requirements, documentation must affirm that all stage crew members will be compensated at a minimum hourly wage of \$25 per hour – to be adjusted annually based on state minimum wage increases, and will receive either Employee Retirement Income Security Act-compliant health care and retirement benefits or equivalent fringe benefit payments in lieu of benefits. These are designed to ensure fair compensation, promote workforce stability, and prevent the misclassification or underpayment of event workers.

In accordance with California labor standards enforcement practices, a wage theft deposit is required and will be fully incorporated into the overall event deposit; it does not result in any additional or increased financial obligations beyond what entertainment events vendors or hosts have historically provided. The deposit functions as a compliance safeguard and in addition to the Department of Parks and Recreation’s approved collections, the deposit may also be used to satisfy substantiated wage theft claims should violations occur, reinforcing accountability while minimizing the need for post-event enforcement actions.

Finally, to promote transparency and worker awareness, multilingual workers’ rights notices must be posted by event contractors in conspicuous locations at covered event worksites for the duration of the event. These notices inform workers of their rights under California law and provide clear information on how to report potential violations, ensuring access to enforcement mechanisms regardless of language or background.

Pre-Event Set Up Requirements

OLSE staff will verify crew safety certifications, match on-site workers to the roster provided during pre-event documentation, and confirm local-hire compliance. OLSE will conduct daily safety briefings. These briefings serve to educate workers on site-specific hazards, their rights under the ordinance, and protections against retaliation.

Requirements During Event

OLSE staff will serve as the event safety monitor and document the event’s overall safety. OLSE will oversee labor standards compliance and field inquiries from on-site workers. If serious violations or hazardous conditions are identified, OLSE retains authority to issue stop-task or stop-work orders to prevent harm and require immediate correction action.

Post-Event Enforcement

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Following an event, if OLSE initiates an investigation due to a worker complaint, entertainment events vendors may be required to submit documentation to OLSE. OLSE will review submitted documentation, conduct an investigation as necessary, and issue determinations within its regulatory timeline. Documents include, but are not limited to, payroll, incident logs, subcontractor lists, certification audits, and local-hire identification.

Enforcement tools include corrective action, conditional permits, suspensions, and debarment reviews, as well as referrals to Cal/OSHA in cases of serious safety violations. All covered entities, entertainment events vendors, vendors, and subcontractors are jointly and severally liable for compliance, and penalties may include back wages, fringe benefits, interest, and civil fines. Any alleged violation is subject to notice and an opportunity to respond or contest pursuant to the procedures set forth in the applicable ordinance and implementing regulations, prior to the imposition of final penalties or adverse actions.

Penalties

OLSE has existing authority under Administrative Code Section 125.2 Article VIII to assess penalties and award restitution, and require corrective action based on the nature and severity of violations. Funds collected through enforcement actions are directed to the County's Workplace Justice Fund, which supports ongoing worker protection efforts. To implement this ordinance, OLSE will develop administrative regulations that standardize compliance requirements, investigative procedures, and enforcement processes specific to events held on County-owned and leased park property, and will report back on the development of those regulations.

Community Outreach and Engagement

OLSE conducts extensive, year-round outreach and community engagement to ensure both workers and businesses are informed, supported, and able to comply with applicable labor standards. OLSE's outreach strategy is intentionally integrated within its enforcement programs and emphasizes education as a primary tool for prevention and compliance. During our review period, OLSE conducted outreach to collect feedback from multiple event organizers, production companies, and labor supply agencies that have conducted high-impact events at County Parks in the past two years. Based on feedback from stakeholders, OLSE was able to incorporate elements of this ordinance to address concerns around safety and consistent application of enforcement, which were raised by workers' groups, as well as event cost implications, which were raised as an area of concern by event organizers.

Since August 2025, OLSE has conducted 46 outreach and community engagement events focused on wage theft prevention and labor standards compliance, reaching a total of 1,432 workers and employers across all events. These engagements regularly include multilingual trainings, workshops, and presentations to workers, employers, community-based organizations, industry associations, and advocacy partners across all supervisorial districts, with targeted efforts in industries and communities most impacted by wage theft and labor violations.

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OLSE maintains a strong presence at community events, resource fairs, and stakeholder convenings, and partners closely with trusted community-based organizations to reach low-income, immigrant, and historically underserved populations. For businesses, OLSE provides proactive compliance assistance, technical guidance, and responsive education to help employers understand evolving labor requirements and avoid unintentional violations. This dual-constituent approach strengthens voluntary compliance, improves access to enforcement, and enhances OLSE’s ability to identify emerging trends, inform policy development, and allocate enforcement resources effectively. Through these comprehensive outreach and engagement efforts, OLSE advances equitable labor standards enforcement while fostering transparency, trust, and accountability across San Diego County’s workforce and business community.

To support the effective implementation of the ordinance, OLSE will conduct targeted outreach and education to workers, entertainment events vendors, and affected businesses. These efforts will include pre-event briefings, written guidance, and training materials that clearly explain the ordinance requirements, worker rights and responsibilities, and compliance expectations. Outreach will be designed to ensure accessibility for diverse audiences and will emphasize early engagement and technical assistance to promote voluntary compliance, reduce confusion, and support successful event planning while protecting labor standards.

LINKAGE TO THE COUNTY OF SAN DIEGO STRATEGIC PLAN

Today’s proposed action to improve safety and labor standards at events held on County-owned and leased park properties supports the Sustainability, Equity, and Community initiatives in the County of San Diego’s 2026-2031 Strategic Plan by enhancing event safety, addressing economic precarity, and creating opportunities for San Diego’s entertainment workforce.

Respectfully submitted,



EBONY N. SHELTON
Chief Administrative Officer

ATTACHMENT(S)

ATTACHMENT A - ADOPT AN ORDINANCE TO ADD CHAPTER 28 TO DIVISION 1 OF TITLE 2 LICENSES, BUSINESS REGULATIONS, AND BUSINESS TAXES OF THE COUNTY CODE OF REGULATORY ORDINANCES RELATING TO IMPROVING SAFETY AND LABOR STANDARDS IN COUNTY PARKS (Clean Copy)

ATTACHMENT B - ADOPT AN ORDINANCE TO ADD CHAPTER 28 TO DIVISION 1 OF TITLE 2 LICENSES, BUSINESS REGULATIONS, AND BUSINESS TAXES OF THE COUNTY CODE OF

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REGULATORY ORDINANCES RELATING TO IMPROVING SAFETY AND LABOR STANDARDS IN COUNTY PARKS (Informational Copy)

ATTACHMENT C – SUMMARY OF PROPOSED ORDINANCE