

METRO CEMETERY STANDARDS REVIEW

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by Paul M. Elvig *



On February 7, 2012 Metro's Pioneer Cemetery Program put into practice their new "Interment Verification and Soil Protocol" guidelines. This followed a highly publicized event in which human remains and old casket parts from early burials were discovered by a citizen during January and May of 2011 in soil removed from one of Metro's 14 pioneer cemeteries. Upon learning of such, Metro launched an extensive investigation into the reported event(s) conducting a thorough review of its internal practices. This was done to assure the public of burial integrity in the case of each and every grave opened within its jurisdiction. In order to continue providing burial service for those who already owned graves and for those who would wish to purchase such for future use from their unsold inventory, Metro's management directed that a detail outline of interment verification and soil protocol be adopted at the earliest possible date.

I have been asked to review the new guidelines as to "industry standards" that are familiar to me based on my 40-year background in cemetery management and cemetery regulation. Further, I have been asked to prepare this report for Metro setting forth any concerns, special observations, or recommendations that I might have, and to highlight areas where the new guidelines may fall short of, or exceed industry standards as I know them.

After visiting all 14 of Metro's Pioneer cemeteries, reviewing historical and current maps, reviewing records maintained for each cemetery, observing the preparation of graves for burial by an independent contractor, interviewing Metro Pioneer cemetery staff members and those associated with the independent contractor, observing Metro's soil management practices including soil removal and reviewing their special exception records log, **I have concluded that the "Interment Verification and Soil Protocol" adopted February 2012, not only meets industry standards, it meets the special needs of Metro's Pioneer Cemetery Program, and in many cases exceeds known industry standards.**

Interment Verification

Records Review

Procedures for Cemetery Coordinators requiring pulling of lot files and reviewing lot sheet information, reading all available recorded history regarding the burial site to be used by the Coordinator when making arrangements is well detailed within the guidelines. Given varied original establishment dates of each cemetery in question and the likelihood that records being reviewed may have been updated, corrected and amended over the last century does require higher standards of review than most “newer cemeteries” find necessary. Maps of record, in most cases, are second, third and even fourth generation maps. Some maps used today are not current nor correct as to platting; this requires careful analysis by the Cemetery Coordinator each time a map is used. Also, some files contain records where errors and omissions can be found and where notations made on so-called “greening maps” (colored in maps showing availability) have not been carried over to standing files. The Manager’s review of the Cemetery Coordinator’s findings sets a very high standard of interment verification, a standard that is a must within Metro’s cemetery management when interment verification is being made.

Locating & Measuring Graves

The guideline sets forth grave measurement procedures that involve a “second look” by a second party to assure that the proposed opening will not intrude onto an existing grave space. Painting the outline of the proposed opening on the grave itself with special markings directing the “gravediggers” where to start is a higher standard than I have seen elsewhere. Such a higher standard is necessary for Metro since original burials were made by 14 different cemetery organizations in many cases over a hundred years ago under varying records systems and methods of grave preparation. Being assured of correct measurements in a pioneer cemetery is a challenge at best, a challenge the new guidelines address with detail and care. Metro’s use of special industry tools to confirm “edges” of a grave along with possible pre-existing content are of highest industry standards.

Corner markers (*locaters*) and the accuracy of such markers within the cemeteries are a problem in that they either do not exist or in some cases have been moved. This requires extra time and effort when verifying the actual grave location. Cemetery Coordinators not only use such corner markers to find a grave, they must use grave descriptions cast into the foundations of existing memorials and monuments. The later can prove to be unreliable in that such were cast by third parties; memorials may have been moved per family request ... moved with the old location still featured. The use of old maps locating known burials within a small area all become part of determining the grave for measuring purposes. The guidelines set forth high standards for such research. (*See list of recommendations below.*)

In cases where there is not enough room for a proposed casket burial the guidelines properly default to selection of a new site. This is a high standard and one that must be followed without exception. The guideline alludes to possible cremation placements instead of casket burial. Any changes in “use of” should be noted in the permanent records as referenced in the guidelines. Metro has set a high standard in this area.

Soil Management (Protocol)

Removal of Soil

Specific programs adopted by Metro might be referred to as 'hybrid' in that they were designed to offer special protection for existing pioneer burials. Aged graves, in which the so-called modern concrete burial liners or vaults were not used, do what nature will do; deteriorate over time. Pioneer grave deterioration can in some cases lead to a collapsing effect when adjacent graves are opened. *(This occurs from time-to-time in older cemeteries found throughout the Pacific Northwest including Metro's)* Metro's guidelines requiring a special soil management program is designed to address such by affording the maximum integrity to existing graves. I have not seen such a well-designed soil management program before. Each burial made today displaces approximately $\frac{3}{4}$ of a cubic yard of soil. Many cemeteries hold at graveside the first soil removed for refill purposes, discarding the second portion of soil last removed from the bottom of the newly opened grave. Metro's new concept of soil removal is unique to the industry: First earth removed is not used for backfill, such becomes the discarded soil ... only the last removed is used for "back filling" the new grave. This assures bottom-of-the-grave soil integrity as it might relate to a partial grave collapse of an old existing "neighboring" burial. While this hybrid process may take longer to open and close any grave, it maximizes public assurance of grave "integrity." Metro has set a standard much higher than found within the industry as far as soil removal is concerned.

Visual Inspection of Soil

The visual inspection of soil being removed, loaded, unloaded and refilled is higher than I have seen in any cemetery. Given the issues Metro has dealt with, the guidelines set a standard that should best assure the public along with Metro management that care is being taken by all those involved with the opening and closing of a grave. A very high standard has been set! While viewing the removal of soil and subsequent off loading at the St. John's storage area, I did not observe on the part of the independent contractor's staff the level of concern expressed within the very high standard set by Metro.

Unexpected and Inadvertent Discoveries

The introduction by Metro of a "Record of Inadvertent Discovery" form to be completed by individuals preparing a grave is also unique within the industry. I expect to see some older cemeteries adopt Metro's new form as a useful tool for cemetery management. The guidelines call for maintaining a log of such discoveries which allows management to review patterns established and to take corrective action when needed.

Under "Soil Management" item 11 the "stop and notify" and "Contractor shall not leave" the site when discoveries are made clauses are outstanding control procedures. I have not seen this spelled out as well in cemetery policies before. The guidelines further detail without exception, that "No known remains or funerary objects shall be removed and transported from the area of the cemetery in which they were discovered." It is critical that the independent contractor, SI and their employees follow this specific Metro guideline directive. Based on conversations I had

with SI staff I am concerned with regard to the understood seriousness of the guideline. Should a disconnect exist between SI staff and Metro, misunderstandings would easily unravel the purpose of the guidelines. The guidelines are good and straight forward ... ones that the industry would do well to follow. The guideline approach taken by Metro as to unexpected discoveries certainly sets a high standard.

Removed soil (*top half of a newly opened grave*) procedures and inspection of such at Metro's St. Johns Restoration Area covered in the guidelines exceeds industry standards. Such procedures are costly to Metro and represent an overhead commitment commensurate to the standards found within the guidelines.

Back filling detail described in the guidelines is to industry standards.

Public Concerns Properly & Professionally Addressed

In my opinion, Metro has properly and professionally addressed public concerns regarding existing burials and grave preparation. Success of the guidelines in protecting historical burials and assuring the public of Metro's commitment to "dignity and respect" referenced within the guidelines will be found in Metro's commitment to following the check and double check requirements of the guidelines. The burden to do so lies heavily upon Metro's cemetery management.

I have found the Metro Pioneer Cemeteries' staff to be most professional in their approach to serving the public. Each staff person knows and understands the adopted guidelines. Metro's Cemetery Manager, Rachel Fox is a leader in her own right; she loves cemeteries, their history, and cares about the people Metro serves. In the short three and a half years of her management, she has been called upon by trade associations to share her findings regarding the protection of existing pioneer burials and management of such properties. Rachel is a natural leader.

Recommendations

Cemetery Arrangement Office at Metro Headquarters

I would strongly recommend that Metro open a public cemetery arrangement office at its headquarters for the purposes of meeting people who are arranging burials. The cemetery office environment in which arranging parties are able to see and watch the recovery of cemetery records and partake in making burial decisions will allow for a much closer relationship with all served. I believe there are efficiencies to be achieved within such a concept and best use of staff time should occur.

New Survey Pegs within Active Cemeteries

I would strongly recommend that Metro consider having each cemetery presently accepting burials surveyed and "pinned" offering primary locaters that Coordinators might better rely upon. Such pinning need not be for each section or lot, but offered once every 50 to 100 feet.

This would allow the Coordinator to measure with exactness using a single measuring tape. Measuring would only need to be done at right angles affording best coordinates.

Opening & Closing / Maintenance Staffing

Further, I strongly recommend that Metro investigate the possibility of having its own opening and closing crew, a crew that could also be used for light cemetery maintenance during scheduled burial services. Should the opening and closing crew actually be employees of Metro, the guidelines now being followed might be amended to reflect the in-house nature of the opening and closing process.

Guidelines Review

The "Interment Verification and Soil Protocol" adopted last February should be reviewed on an ongoing basis as to practicality and usefulness. Such reviews and amendments would best allow Metro to respond to evolving needs and concerns. I recommend a formal review at least annually.

Rules & Regulations Updated – Published

I recommend that Metro publish a consolidated set of Rules and Regulations regarding the 14 cemeteries under their management. I understand the management has this project underway ... a project I strongly support

* Past President International Cemetery, Cremation and Funeral Association 2007-2008
* Past President National Cemetery Regulators Association 1986-1988