California Underground Facilities Safe Excavation Board

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Agenda Item No. 19 (Information Item) – Staff Report

"No 811" Pilot Program Update

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SUMMARY
In 2023, the Underground Safety Board (Board) Investigations staff launched the "No 811" Pilot Program to identify and investigate damage to gas subsurface installations occurring without prior notification to a regional notification center. The pilot addresses a reporting gap by creating a voluntary process for gas operators to notify the Board of potential "No 811" damages and submit supporting documentation.

Staff initially expected to recommend expanding the program to natural gas operators statewide at the November 2026 Board meeting. To prepare to expand the program statewide, staff began developing a dedicated online notification process to transfer operator-submitted information and supporting documentation into the Board's case management system. During implementation and testing, staff encountered problems with this automated transfer.

Launching statewide before resolving the system automation issues would require investigators to manually enter operator notifications and supporting documentation into the case management system. Based on the potential notification volume, this administrative work would divert investigators from conducting investigations and could delay existing and future cases.

Staff therefore does not recommend expanding the program statewide at this time. Staff will continue operating and evaluating the pilot, address the technical and operational issues, assess resource requirements, refine operator guidance, and establish launch-readiness criteria. Staff will return to the Board with an update and, when appropriate, a recommendation regarding statewide launch.

STRATEGIC PLAN
2020 Strategic Plan Objective: Improve Compliance by Reaching Parties in Effective Ways

BACKGROUND

“No 811” Reporting Gap

Government Code 4216.4(c)(3)[1] requires an excavator that discovers or causes damage to a subsurface installation to notify the appropriate regional notification center.

Title 19, California Code of Regulations, section 4100[2] establishes additional notification requirements for damages to natural gas and hazardous-liquid pipelines, including notification within two hours under specified circumstances. Each regional notification center transmits the required damage information to the Board.

These requirements apply to excavators. Board regulations do not require operators to report excavation damages directly to the Board.

When excavation occurs without an 811 ticket, excavators already out of compliance are less likely to report damage and often do not report it to the Board. This creates a reporting gap regarding excavation damages that occur without prior notification to a regional notification center and the Board.

Gas operators raised concerns to the Board that a significant number of damages to their facilities were occurring without an 811 ticket. Gas operators reported that they frequently identified no-ticket damages during repair work. However, the “No 811” damages were not consistently reported through existing reporting processes by the operator or excavator.

In response to this reporting gap and stakeholder feedback, the Board established the “No 811” Pilot Program. The pilot provides a voluntary process through which gas operators may report potential “No 811” damages and provide supporting documentation for Board review.

“No 811” Program Objectives

The program objectives are to:

- Intake and evaluate no-ticket damage notifications that are often not being reported through existing reporting systems.
- Investigate qualifying no-ticket damage notifications to better understand causes, behaviors, and compliance gaps.
- Reduce the number of no-ticket damages in California.

Common Ground Alliance No-811 Damage Data

The Common Ground Alliance (CGA) is a stakeholder organization focused on preventing damage to underground infrastructure and promoting safe excavation practices. CGA publishes the annual Damage Information Reporting Tool Report (DIRT Report), which analyzes voluntarily submitted damage and near-miss data to identify trends, common root

[1] Government Code § 4216.4

[2] 19 CCR § 4100. Damage Notification by Excavators

causes, and opportunities to improve damage prevention.[3]

CGA's "No 811" damage data helps illustrate the potential size of the reporting gap because many damages that occur without an 811 ticket may not be reported to the Board through existing processes. The data suggests that gas operators may be aware of a substantial number of these incidents, indicating that statewide expansion could significantly increase the volume of notifications submitted for Board review.

The CGA DIRT Report Dashboard reports that in 2025 the leading root cause of subsurface installation damages in California was the failure to notify the regional notification center at 41% (2,788 damage reports with no 811 out of 6,796 damages in California).[4] Of the 3,814 unique natural gas damages in California voluntarily reported to CGA, 51.7% (1,971 gas damages) were reported as having a root cause of no notification to the regional notification centers for the incident.

The CGA data reflects root causes submitted by the reporters to the CGA. The CGA data indicates a substantial number of potential "No 811" gas damages may exist outside the damage notifications routinely received by the Board.

The absence of a valid ticket in this dataset does not establish that a violation occurred. However, the information indicates the potential volume of around 2,000 reportable incidents a year (over 160 per month) that could be submitted for Board review as the program expands statewide to natural gas operators.

Pilot Program Activity

From July 1, 2024 to September 1, 2026, the pilot received 352 operator notifications, averaging about 14 notifications per month. Because of limited staffing and investigation challenges due to lack of firsthand documentation provided by operators regarding the reported incidents, staff developed a triage process in mid-2025 to improve the investigation readiness. Between mid-2025 and September 1, 2026, staff had triaged 211 operator notifications and opened 193 investigations.

These figures help staff estimate the workload for the intake, triage, and investigative workload that could result from the statewide expansion to gas operators. The high rate of triaged notifications leading to investigations suggests that expansion could significantly increase both investigative and administrative work for the program.

DISCUSSION

The CGA damage data and the pilot's activity demonstrate the potential value of expanding the "No 811" Pilot Program to gas operators statewide. This data also indicates that expansion could generate a significant volume of notifications and investigations. Staff's implementation

[3] Common Ground Alliance, https://commongroundalliance.com/

[4] Common Ground Alliance, Damage Information Reporting Tool Dashboard, data for California in 2025. (Accessed September 2, 2026.)

work has therefore focused not only on how gas operators would submit notifications, but also on whether the Board has the systems, staffing, and operational capacity necessary to receive, process, and investigate them effectively.

Processes Established through the Pilot

The pilot has allowed staff to establish and test:

- A dedicated operator-notification process for potential "No 811" damages.
- A triage process for reviewing notifications and supporting documentation for investigation readiness.
- Standardized processes for requesting information from excavators.
- Investigation templates and procedures.
- Initiating investigations to validate and improve operational procedures.

This experience has helped staff identify the systems and resources needed to support higher notification and investigation volumes.

Planning for Launching to Gas Operators Statewide

Although gas operators may already report excavation damages voluntarily, statewide implementation would establish a dedicated process for reporting potential "No 811" damages and submitting supporting evidence.

To prepare for expansion, staff began developing website enhancements that would allow natural gas operators to submit notifications and supporting documentation directly to the Board. Staff also began preparing guidance and instructional resources explaining the notification process, reporting procedures, and supporting documentation requirements.

A central component of this work was the intended automated transfer of operator-submitted information and documents into the Board's case management system. Automation is necessary to reduce repetitive data entry, promote consistent records, support efficient triage, and allow investigators to focus on evaluating evidence and conducting investigations.

Case Management Integration

During implementation and testing, staff encountered problems transferring operator notifications and supporting documentation into the case management system automatically. The current process does not reliably create and populate case records as intended.

If the program were launched statewide under the current process, staff would have to manually transfer information from each operator submission into the case management system, create or populate the corresponding records, and organize the supporting documentation for review. These administrative tasks would increase as notification volume grows.

Statewide data from CGA, discussed above, suggests that the expansion of the program could generate substantially more notifications than the pilot has received. A manual process that

may be manageable for a limited pilot would not necessarily be sustainable at statewide scale.

Effect on Investigative Resources

Any time spent entering, organizing, and reviewing notification data would reduce the time available for investigators to investigate the "No 811" cases themselves.

Launching before the program workflow is scalable would create notification backlogs, delay investigations, and affect the timeliness and consistency of the program. It could also divert resources from investigations unrelated to the pilot.

The implementation issue does not change the purpose or potential value of the "No 811" Program. It does, however, affect whether the Board can expand the program without impacting existing investigative responsibilities.

Next Steps

Staff will continue the existing pilot and undertake the following activities

1. **Address system integration issues:** Staff will work to resolve or redesign the automated transfer of notification information and supporting documentation into the case management system.
2. **Test the complete workflow:** Staff will test the process from operator submission through data transfer, document organization, triage, case creation, and investigation assignment.
3. **Assess resource requirements:** Staff will determine whether administrative, technical, or other support is needed to operate the program without diverting investigators from core investigative duties.
4. **Develop resources for gas operators:** Staff will continue developing notification instructions and instructional resources so gas operators understand the reporting process and supporting documentation requirements.
5. **Establish launch-readiness criteria:** Before returning with a launch recommendation, staff will evaluate whether:
    - Notification data and documents transfer reliably into the case management system.
    - The end-to-end workflow has been tested successfully.
    - Notifications can be processed within an acceptable timeframe.
    - Staffing and system capacity are sufficient for anticipated volume.
    - Investigative resources can be maintained for existing and new cases.
    - Program performance measures and reporting processes are in place.
6. **Continue evaluating program impact:** Staff will assess outcomes such as changes in excavator behavior, awareness of 811 requirements, and engagement with the 811 process, rather than relying solely on the number of notifications or enforcement actions.
7. **Return to the Board:** Staff will provide a future update on implementation progress and will present a launch recommendation when the program is operationally ready and sustainable.

Program Impact

Statewide expansion is expected to improve the Board's access to information concerning potential "No 811" damages. A dedicated notification and triage process has reduced follow-up work and allowed investigators to focus on investigating incidents.

The program's impact should be evaluated through measurable outcomes, including changes in excavator behavior and increased engagement with the 811 processes, rather than solely by the number of notifications received or enforcement actions completed. Performance measures should assess whether awareness, compliance, and participation in the 811 processes improve among excavators in different geographic regions and industry sectors. These measures will provide a more meaningful basis for determining whether future expansion advances the statewide objectives of reducing "No 811" damages and improving public safety.

Staff presented preliminary information regarding excavator behavioral changes associated with the pilot at the February 2026 Board meeting and will continue evaluating the program's overall impact.

RECOMMENDATION

Staff does not recommend expanding the program to natural gas operators statewide at this time because unresolved case management system integration issues would require investigators to perform substantial manual data entry and would divert resources from investigative work.

Staff will continue the pilot, address the technical and operational issues, assess resource requirements, refine operator guidance and program performance measures, and return to the Board with an implementation update and potential launch recommendation when the program is operationally ready and sustainable.