California Underground Facilities Safe Excavation Board

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Agenda Item No. 12 (Information Item) – Staff Report

Planning and Design Information Exchange Update

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SUMMARY

This report summarizes stakeholder feedback received during the January 6, 2026, workshop on Data Requirements and Format for the Planning and Design Information Exchange required under Senate Bill (SB) 254. The workshop represents an early step in the Board's regulatory development process and was designed to inform the identification of essential ticket data fields and appropriate digital formats for statewide planning and design coordination.

The purpose of this report is to:

- Summarize stakeholder input received during the January 2026 workshop;
- Identify recurring themes and areas of alignment across stakeholder groups; and
- Explain how feedback will inform upcoming workshops, system testing, and regulatory development.

STRATEGIC PLAN

2020 Strategic Plan Objective: Improve Accessibility of Buried Infrastructure Location Knowledge and Understanding

2023 Plan Activity: Develop a Planning and Design Ticket

BACKGROUND

SB 254 shifted California's planning and design framework from voluntary to required. The statute directs the Board to define timelines, standard processes, data type and format requirements, and any other requirements necessary to accomplish the planning and design information exchange.

Following the Board's November 2025 discussion, staff continued working on its outreach to allow early stakeholder participation. Since the last Board update, staff have held one workshop and are in the process of scheduling another workshop and releasing a survey as part of the SB 254 development plan presented at the last Board meeting. The first workshop, held on January 6, 2026, focused on planning and design data requirements and digital format in which the information should be exchanged. A second workshop, planned for late February 2026, will address standard processes and ticket procedures. In addition, a survey planned for February 2026 will seek feedback on appropriate timelines for submitting, reviewing, and responding to planning and design requests and other necessary planning and design related information.

Together, these engagement activities are intended to gather structured input on the foundational elements of the planning and design information exchange before staff begin drafting regulatory language.

DISCUSSION

Planning and Design Workshop Summary

The January 2026 workshop was structured around two primary discussion areas aligned with SB 254's statutory direction. The first discussion focused on essential planning and design ticket information, existing practices, excavation location information, documentation sharing, and contact information necessary to support early coordination. Participants were asked to consider what information is essential at the planning and design stage, how that information is currently shared, and where gaps or inefficiencies exist.

The second discussion addressed digital formats, including file formats for planning and design documents, data requirements, and utility information-sharing concerns. Staff sought input on commonly used file formats, appropriate levels of data detail, storage and record retention considerations, and how to balance transparency with data security. Collectively, these questions were designed to assess operational realities, identify common challenges, and better understand how a future statewide information exchange could be implemented in a way that is both effective and scalable.

The feedback summarized below reflects input from designers, utility operators, public agencies, and other stakeholders participating in the workshop and will be used by staff to guide the next steps of SB 254 implementation.

<u>Existing Practices for Gathering Planning and Design Information</u>

Based on stakeholder feedback, many designers already rely on a multi-step, informal information-gathering process during the planning and design phase. Under this approach, designers gather available information from facility owners and operators, including maps, as-built drawings, and proposed project designs. Information is collected through a combination of 811 center inquiries, direct coordination with operators, engagement with public agencies,

and on-site reviews for visible surface indicators such as manholes, valve covers, pedestals, and markers. The information is used to support utility route selection, evaluate design alternatives, and identify potential conflicts early in the project lifecycle.

According to stakeholders, the process varies by jurisdiction and project type and depends heavily on individual coordination efforts rather than standardized requirements. While this approach can support early planning, it currently results in inconsistent access to information, variable data quality, and uncertainty regarding expectations for both designers and utility operators.

Required Ticket Information

Across stakeholder groups, participants expressed strong support for establishing standardized core ticket information that clearly requests and defines work type, location, and contact information. Stakeholders emphasized that early access to consistent planning-level information improves coordination and helps reduce unnecessary follow-up during later project phases, which can be both costly and inefficient.

Designers and engineers indicated that work scope and contextual information—such as whether work occurs in a roadway or on private property—are critical for determining the level of coordination required. Several participants noted that incomplete or inconsistent scope information often leads to conservative assumptions, increased workload for operators, and delays in project development.

Utility operators acknowledged the value of early coordination but highlighted the importance of balancing required information with operational constraints, particularly for smaller utilities with limited engineering resources or incomplete records.

Location and Mapping Information

Stakeholders generally supported the use of mapping-based location information during the planning and design phase, with flexibility in how that information is provided. Participants noted that web-based maps, highlighted polygon areas, and Geographic Information Systems (GIS) files are commonly used and can effectively support early coordination when accompanied by appropriate disclaimers regarding accuracy.

Several stakeholders have referenced the importance of aligning mapping expectations with recognized industry standards for data quality. Participants suggested that defining acceptable accuracy levels, rather than requiring precise locates at the design stage, would allow operators to share information responsibly while managing liability and workload concerns.

Stakeholders raised questions regarding whether depth information should be required as part of a planning and design information exchange. Utility operators noted that obtaining high-accuracy depth information often requires specialized equipment, additional field work,

and trained personnel, which may not be feasible or appropriate at the planning stage.

Stakeholders mentioned use of Subsurface Utility Engineering (SUE) for complex and expensive projects, for aligning utility location accuracy with project requirements. The discussion recognized that the highest level of accuracy is not possible across different projects and sometimes it is only ideal to use where potential utility conflicts are likely to occur, such as urban areas with dense network of buried infrastructure.

SUE, when utilized, means a licensed professional engineer will provide the locating of existing underground facilities that meets or exceeds the American Society for Civil Engineers (ASCE) 38-22 standards.[1] There are four recognized quality levels of underground utility information ranging from Quality Level (QL) D (the lowest level) to Quality Level A (the highest level).[2]

- Quality Level D (QL-D) relies on existing utility records and is commonly used for project planning or utility route selection.
- Quality Level C (QL-C) is the most used level, supplements records with surface observations (manholes, valve boxes), but may still contain inaccuracies. Mainly useful in rural or non-congested utility area.
- Quality Level B (QL-B) uses surface geophysical methods to identify horizontal utility locations and is widely used for planning and preliminary design coordination.
- Quality Level A (QL-A) makes use of SUE and provides the highest level of accuracy, including verified depth, through non-destructive exposure and also provides the type, size, condition, material and other characteristics of underground features.

Digital Format

Participants identified a range of commonly used file formats, including PDFs, CAD files, KMZ/KML files, and GIS-based formats. Stakeholders generally supported allowing multiple acceptable formats, provided that required metadata and minimum content requirements are clearly defined. Stakeholders cautioned against complex technical requests that could limit participation or create barriers for smaller operators. Instead, participants recommended focusing on compatibility, usability, and scalability across existing Regional Notification Center (RNC) systems. Lastly, stakeholders supported a collaborative planning and design information exchange which can help with the facilitation of a standardized framework to avoid system inconsistencies.

Information Sharing and Security Considerations

Information-sharing concerns were a recurring topic during the workshop. While participants acknowledged the need to protect sensitive utility information, some participants noted that much planning-level information is already available through physical markings and other publicly accessible sources such as county substructure maps.[3] Stakeholders suggested that

[1] ASCE 38-22 Standard Guideline for Investigating and Documenting Existing Utilities
[2] Subsurface Utility Engineering (SUE) Quality Levels
[3] ESRI Los Angeles County Substructure Maps | Public Works Hub Site

mechanisms such as qualified data standards and non-disclosure agreements may provide a more balanced approach than restricting access altogether.

Comparative State Practices and Implications for Regulatory Development

Staff reviewed planning and design practices across different states using publicly available resources from state legislatures and one call systems. The review specifically examined whether states have implemented planning and design tickets, whether participation is mandatory or voluntary, the types of information requested, and how design-stage information is exchanged between excavators, designers, and utility operators.

Planning and design practices vary widely, as some states have implemented it within their 811 systems, while others rely on informal notifications or voluntary coordination practices that are not codified in statute or regulation. In many cases, design tickets exist as an optional tool rather than a required process.

Across states that utilize design tickets, common elements include the submission of preliminary project location information, extended response timelines of 5-10 working days compared to standard excavation notification; and the ability for operators to provide maps, drawings, or utility records in lieu of field markings wherever applicable. However, the level of detail requested, accepted file formats, and expectations for data accuracy vary significantly by state. Very few states specify any standardized digital formats or minimum data requirements for design-stage submissions but instead require submission of maps or utility records, or markings that can help locate subsurface utilities.

Pennsylvania's Planning and Design Exchange

Pennsylvania requires designers for projects involving excavation or demolition to notify the Pennsylvania One Call System during the design phase. Pennsylvania distinguishes between preliminary and final design notifications; "preliminary" design notifications are submitted more than 90 business days before completion of the final design, while "final" design notifications must be placed no less than 10 and no more than 90 business days before final design completion.[4] The most recent final design notification may not be older than 90 business days prior to the project bid date or, if no bid is required, the start of construction.

Pennsylvania One Call System, Inc. operates Coordinate PA[5], a web-based, map-centric utility coordination platform used for planning and design information exchange. Coordinate PA allows designers and facility owners to share maps and store project documentation, identify overlapping projects, and coordinate utility-related activities through documented mutual agreements. Coordinate PA also includes a "drawing exchange" feature that allows designers to upload electronic plans and drawings during the design phase. Facility owners can draw on these plans with utility information, upload revised files, and share them with designers within

[4] Underground Utility Line Protection Law | Pennsylvania One Call System Section 4(2)

[5] Project Owners and Designers | Pennsylvania One Call System

the system. This enables a centralized, documented exchange of planning-level utility information without requiring field markings.

Pennsylvania further integrates SUE into its planning and design process. Project owners are responsible for initiating and funding SUE on qualifying projects, particularly large or costly projects. Pennsylvania's example demonstrates a structured approach to planning and design information exchange with clear requirements and exemptions.

"Not for Excavation"

Several states explicitly distinguish planning and design requests from excavation notifications through statutory or regulatory language. Mississippi law clarifies that planning and design information exchanges are intended for activities that "do not involve excavation,"[6] while Missouri law explicitly prohibits excavation activities based solely on a design request.[7] Other states, including Georgia[8] and South Carolina[9], use the designation "not for excavation" as a clear indicator of the purpose and limitations of planning and design tickets. This language reinforces that design-stage information is for informational purposes only and is not a substitute for an 811-excavation notification. Such clarification is vital as it can help reduce confusion, manage liability concerns, and ensure consistent understanding.

Associated Fees

Staff also reviewed how other states address fees associated with planning and design coordination. While several one call systems do not charge designers to place planning or design tickets, some states explicitly allow utility operators to assess separate fees for services provided beyond baseline design-stage responses which involve significant planning, and use of geophysical techniques and SUE.

For example, Michigan statute allows "Facility owners or operators [to] charge the person requesting project design or planning services separate fees for design or planning services."[10] Colorado's 811 notes that some facility owners or operators may charge for providing design-related information.[11] Other states describe planning and design tickets as generally free of charge, which includes basic sharing of utility maps and records, while acknowledging that certain utilities may not provide detailed design assistance for free. Examples of such services may include mapping or GIS exports, engineering reviews, field meets and walkthroughs, design related markings, or higher-accuracy SUE work.

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[6] Mississippi Code 1972 (2024) Regulation of Excavations Near Underground Utility Facilities "(g) ...A design information services request may not be used for excavation purposes."

[7] Missouri Revised Statutes of Missouri, Section 319.027 "No excavation may be commenced based upon information received through a design request."

[8] Georgia Code § 25-9-4 (2024) - Design locate request and response "(d) A design locate request shall not be used for excavation purposes."

[9] South Carolina Title 58 Chapter 36 Underground Facility Damage Prevention Act

[10] MISS DIG Underground Facility Damage Prevention and Safety Act 174 of 2013

[11] Colorado 811: Excavation Handbook – Engineering Tickets

Operator Response Timelines

Review of planning and design operator response timelines across states where planning and design ticket is in law shows a variety of deadlines for responses. For example, Missouri provides five working days,[12] Illinois and Georgia allow ten working days,[13] [14] and Minnesota allows up to fifteen working days for design-stage responses.[15] These timelines are typically longer than excavation ticket response requirements and reflect the non-urgent, planning-level nature of the request.

Stakeholders identified response timelines as a key factor affecting the effectiveness of a planning and design information exchange. Designers generally expressed interest in shorter response timelines to improve project efficiency, cost certainty, safer excavation and early coordination, while utility operators emphasized the need for timelines that reflect operational feasibility, staffing capacity, and record availability.

Taken together, the research illustrates why regulatory design choices are critical to the effectiveness of a planning and design information exchange. Without clear standards, stakeholders have experienced uneven implementation and reduced confidence in the usefulness of design-stage information. As part of SB 254 implementation, staff are evaluating comparable response timelines for California. A stakeholder survey planned for February 2026 will further assess acceptable operator response timelines, scenarios which may require additional response times, and gather input on options that balance early design needs with operator workload considerations.

In the upcoming months, staff will continue building on planning and design information exchange by focusing on reviewing key questions raised by the stakeholders, including operator response timelines, ticket processes and procedures, data quality, and accuracy expectations. Another workshop is scheduled for late February and is intended to identify procedures for how planning and design tickets are issued, managed, and resolved; it will also focus on how roles and responsibilities are defined across designers, operators, excavators, and RNCs; and gather structured input to inform regulatory development for the planning and design information exchange. The operator response survey is also scheduled to go out before the workshop in February, and is intended to identify and establish clear, enforceable timeframes for submitting, reviewing, and responding to planning and design tickets. These timelines will ensure predictability while balancing project efficiency and operator workload.

RECOMMENDATION

Staff recommend that the Board provide feedback on the proposed outreach efforts for developing the planning and design information exchange under SB 254. Specifically, staff

[12] Mo. Ann. Stat. § 319.027 Design requests, how made--marking location required
[13] 220 Ill. Comp. Stat. Ann. 50/4 - Illinois Underground Utility Facilities Damage Prevention Act
[14] Georgia Stat. § 25-9-4 (2024) - Design locate request and response
[15] MN Statutes Sec. 216D.04: Excavation; Land Survey

seek input on whether the Board agrees with the workshop and survey objectives, and if there are any key considerations, additions, or modifications the Board would like staff to explore further as staff continue to gather input.