California Underground Facilities Safe Excavation Board

February 9-10, 2026

Agenda Item No. 16 (Information Item) – Staff Report

Potholing Standards Update

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SUMMARY
This item provides an update on the development of a statewide potholing standard[1] that promotes consistency, safety, and efficiency and helps prevent underground damage. Existing standards define locating practices but lack clear criteria for when and how potholing should occur. Stakeholder feedback emphasized the need for flexibility, cost awareness, and clarified roles. The recommended approach is to revise the potholing standards by adopting a project-based decision structure focused on verifying subsurface installations, supported by checklists, documentation guidance, and feasibility exceptions. This balanced strategy advances the Board's statutory and strategic objectives while improving coordination, reducing unnecessary cost, and enhancing safety across California's excavation community.

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

2023 Strategic Activity: Develop Standards to Assist Excavators in Identifying Locations to Pothole

BACKGROUND
California's 811 Dig Safe notification system[2] reduces excavation risk partly by requiring excavators to determine the exact location of subsurface installations before digging. However, during the last public comment period on the draft potholing standards, stakeholders reported inconsistent potholing practices across projects and organizations, leading to avoidable damage, schedule slippage, and disputes about responsibilities.

[1] Gov. Code § 4216.18

[2] Gov. Code §4216 et seq.

Statutory and strategic foundation
Government Code section 4216.18 directs the Board to develop excavation safety standards. Developing potholing guidance is in furtherance of this mandate and supports the Board's Strategic Plan objective to improve accessibility of buried infrastructure location knowledge.

How Existing Standards Help and Where They Fall Short
Existing standards (e.g., Common Ground Alliance [CGA] Best Practices; California Public Utilities Commission General Order 128; and Subsurface Utility Engineering [SUE] quality levels in American Society of Civil Engineers [ASCE] standard 38-22) provide valuable components, including locate verification, documentation practices, and quality-level definitions. However, they do not, on their own, give California excavators and designers a coherent, statewide set of criteria for determining pothole location, frequency, intervals, and exceptions within the varied right-of-way conditions.

Problem statement
California lacks a uniform, practical, and statutorily grounded potholing standard to guide excavators and designers on when and how to confirm the location of subsurface installations. This gap contributes to inconsistent safety outcomes, coordination challenges, and cost variability. A statewide guidance standard, anchored in Gov. Code section 4216.18 and the Board's Strategic Plan, is needed to provide clarity on roles, decision-criteria, and documentation expectations, while retaining professional discretion where project conditions warrant it.

DISCUSSION

The following provides each of the draft potholing standards as presented in the July 2025 Board meeting. These draft standards were posted for feedback through a public comment period that ran from July 28, 2025, through September 9, 2025. Included are the public comments about each standard, followed by public comments about the standards as a whole.

1. Identification of Potholing Locations

The excavator determines where potholes are necessary to uncover the exact location of existing buried facilities within the project area. The excavator consults information from multiple sources for existing facility locations (as available) before potholing, including:

- design plans,
- field locate marks,
- visual surveys of surface indicator,
- maps from utility operators,
- input from locators and operators' staff.

To determine direct points of conflict, the excavator identifies and potholes, at a minimum, at the following locations:

- Proposed crossings. The excavator identifies and potholes where the proposed excavation and existing buried facilities will overlap. The excavator does not pothole

in softscape outside the path of excavation to avoid having to pothole concrete or asphalt in the path of excavation.

- Existing crossings. The excavator identifies and potholes existing buried facility crossings to maintain appropriate facility clearances, noting that depths often change at crossings. Information gathered through potholing at crossings supplements, but does not replace, information gathered from potholing other portions of the facility.
- Selected Joints. The excavator identifies and potholes at tees, changes in facility diameter, and any other locations where buried structures, features, or fittings are likely to protrude in the direction of excavation. This also includes any change in the facility's direction.
- Parallel and stacked facilities. When trenching or boring to install a new buried utility parallel to an existing one or road milling or grading over existing lines, the excavator identifies where to pothole and how many potholes to make to preserve horizontal and vertical clearances (separations).
- Change in direction. The excavator potholes to identify when buried facilities deviate from a straight path.
- Expected cover. The excavator should consider whether the depth of cover has changed due to loss of ground cover, soil type, or land use and perform additional potholes to verify depth of facilities.

Discussion: When determining pothole locations, excavators use multiple sources of information that may be present at the project area after the locate-and-mark process, including field locate marks and surface indicators. Other sources, such as maps, design plans, and recommendations from locators and operators' staff require participation from external entities beyond the standard locate process. Crossings of any kind, both proposed and existing, are opportunities for encountering facilities at unpredictable depths and should be potholed. Junctions, fittings, and other joints are often bulkier than the rest of a line and may also indicate the presence of unlocatable or abandoned stubs nearby. Parallel facilities present a continuous risk: maintaining horizontal and vertical clearances, investigating changes of direction, facility materials, facility conditions or vintage, and the soil conditions surrounding each utility may all be causes for additional potholes. When a change in direction is identified it should be verified in multiple locations. When a change of cover is identified it should be verified in multiple locations as the change in cover may vary along the length of the project. Meetings about high-priority facilities within ten feet of the excavation per 4216.2(c) and other pre-construction meetings may result in recommended potholing of some facilities at regular intervals to ensure adequate clearances. Contractual agreements regarding facility exposure may specify mandatory potholing of some facilities.

Public Comments (Section 1)

- Excavators should be required to pothole known existing utilities prior to excavation.
- Engineers and design firms should be required to pothole at the design phase and provide a "pothole sequence plan."
- Lack of potholes in design plans has resulted in un-constructable projects due to reliance on as-built drawings.
- An introductory section with key definitions (e.g., Excavator, Utility Operator, Pothole,

Test Hole) should be added for clarity.
- Excavators should have discretion to determine the number and exact locations of potholes rather than following strict minimum requirements.
- Minimum potholing requirements for "selected joints" may lead to potholing outside the intended excavation area and should be reconsidered.
- Minimum potholing requirements for parallel and stacked facilities should exempt utilities located more than 24 inches from the excavation; utility owners should ensure vertical clearance when outside the excavation area.
- Excavators should coordinate with utility operators in identifying pothole locations for parallel facilities.
- Potholing for changes in direction should be removed, as such changes are already addressed under proposed or existing crossings.
- Potholing for expected cover should be removed because utility markings (USA marks) do not indicate depth.
- Language should direct excavators to coordinate through their contracting entity rather than acting independently.
- Hard requirements for specific pothole locations should be removed; guidance should allow flexibility based on project conditions.
- Clarification is needed for terms like "change of cover" to avoid ambiguity.

2. Confirmation of Marks Using Utility Operator Responses and Surface Indicators

The excavator uses the information provided by utility operators and reviews the site for surface indicators to confirm that all utility operators have identified their buried facilities.

Excavators document markings and potentially unmarked surface indicators. If the excavator identifies a discrepancy among utility responses, marks, and surface indicators that could lead to the damage of a buried facility, the excavator contacts the utility operator to resolve the discrepancy.

If a mark by a utility operator does not include the number of buried facilities in a bank of conduit or ducts, the width of buried facilities, or the size or material of the buried facility, the excavator contacts the utility operator for clarification.

Discussion: Surface indicators, such as junction boxes, hand holes, transformers, and streetlights indicate the presence of buried infrastructure.

Related requirements, best practices, and guidelines include:

- Government Code sections 4216 (n) and 4216.3 (a) & (e).
- California Public Utilities Commission General Order 128[3] (Construction of Underground Electric Supply and Communications Systems), Rules 17.8 (Identification of Manholes, Handholes, Subsurface and Self-contained Surface-

[3] GO 128 - Rules For Construction of Underground Electric Supply and Communication Systems

mounted Equipment Enclosures) and 35.1 (Identification of Cables)
- CGA Best Practices[4] 5.10 (Locate Verification), 5.11 (Documentation of Marks), 5.12 (Work Site Review with Company Personnel), 5.21 (Mismarked Facilities), Appendix B (Guidelines for Operator Facility Field Delineation)[5]
- American Water Works Association California/Nevada Section Guidelines for Distribution of Nonpotable Water[6] (1992) Sections 2.5 (Valve Box and Other Surface Identification) and 4.1 (Marking).

Public Comments (Section 2)
- Clarify the excavator's obligations when the information provided by the utility operator represents the "best available" data.
- Require contacting both the utility operator and 811 before proceeding when discrepancies or uncertainties are identified.
- Paragraph regarding incomplete mark information (e.g., missing number, size, or material of buried facilities) should be removed because excavators often cannot know what specific information is missing.
- The section does not mention potholing and may be unnecessary in the context of potholing standards.

3. Pothole Frequency, Intervals, and Depth

The excavator always evaluates and determines the frequency and intervals of potholes using the most current information available including the appearance of new locate marks or surface indicators that became apparent after the completion of design plans, and any other identifying factors. The excavator ensures that the depth of potholes is no less than the depth of the planned excavation plus a 12-inch margin to verify whether facilities are present beneath the excavation zone. The excavator may need to physically support exposed facilities to prevent movement as specified in CGA Best Practice 5.22[7].

Discussion: The excavator always gathers all available information from design plans, maps, mark-and-locate marks, landmarks, observations from site walks and any other indication that a subsurface facility might be present within the excavation zone. The frequency, intervals, and depth of potholes will provide the excavator visual verification of known facilities, unmarked facilities, and any other obstacle.

Public Comments (Section 3)
- Contractors should be required to pothole and locate utilities regardless of depth to verify the corridor is clear and to document any obstructions encountered.
- The 12-inch margin for pothole depth should be reconsidered: options include increasing to 24 inches, verifying the exact location per agreement or allowing

[4] Common Ground Alliance Best Practices Home
[5] Guidelines for Operator Facility Field Delineation
[6] Guidelines_for_the_Distribution_of_Nonpotable_Water.pdf
[7] 5.22 Exposed Facility Protection

mutually agreed depths.

- When potholing within 12 inches of a pipeline, require use of oscillating tips on hydro excavation to reduce coating damage and ensure hydro pressure follows manufacturer guidelines. Contractors should be held liable for any coating damage or necessary repairs.
- Remove or adjust the fixed 12-inch depth margin, as it may be cost-prohibitive for shallower projects.
- Specify a minimum potholing frequency while allowing flexibility for additional factors that could alter the frequency, reconciling with Section 1's guidance on pothole location determination.

4. Deeply Buried Facilities – Exceptions to Positive Confirmation Based on Data Quality C Information

When the utility operator has identified a facility significantly deeper than the excavation, designers and/or excavators can use a combination of Quality Level C and Quality Level D information in lieu of exposure.

Discussion: Deeply buried facilities lie at a significant depth below the ground surface. Deeply buried facilities typically include large-diameter pipes, tunnels, and other infrastructure but may include other types of facilities, such as communications conduits, installed through horizontal directional drilling. Utility operators communicate the presence of deeply buried facilities as part of the information provided to designers and excavators. Quality levels are defined in ASCE 38-22, where:

- Quality Level D refers to record research,
- Quality Level C includes a review of surface indicators and comparison to records,
- Quality Level B uses surface electronic locating or other geophysical methods, and
- Quality Level A generally requires exposure of a buried facility to determine its location.

Public Comments (Section 4)

- This section appears to provide guidance for designers rather than excavators and may be misplaced in a potholing standard.
- The term "significantly deeper" should be clearly defined to avoid ambiguity.
- Utility operators, rather than designers or excavators, should determine whether it is appropriate to rely on Quality Level C and D data, as designers and excavators may not fully understand the risks associated with deeply buried pipelines.

5. Actions When Potholing Cannot be Performed

The excavator meets with the operator and any other relevant representatives (such as, but not limited to, representative of a local city, county or state office with jurisdiction over the area to be excavated) when potholing is to be performed and the parties agree on a strategy to identify and protect subsurface facilities that may be present prior to proceeding with mechanical excavation. The operator ensures that an agreement is reached with all relevant

parties prior to proceeding with excavation.

Discussion: The CGA Best Practices address situations when trenchless excavation will be used and facilities are known to be present but cannot be potholed. This standard expands to excavation methods other than trenchless excavation (such as open trench excavation when facilities are embedded in concrete or well drilling) and ensures that the operator reaches agreement with all relevant parties prior to the excavator proceeding with excavation.

Public Comments (Section 5)

- Requiring individual agreements for each project is overly burdensome; allow for blanket agreements or memoranda of understanding between operators and excavators.
- Clarify whether agreements must be written or verbal, as requiring written agreements for every project may be too burdensome.
- Provide additional examples of situations where potholing cannot be performed (e.g., concrete-lined flood control channels, under creeks, tunnels).
- Excavators should ensure that an agreement is reached before proceeding, preferably documented in some form.
- Recognize that operators cannot always be contacted or compelled to share information.
- Clarify whether the intent of this section is to allow excavation beyond hand-dig methods when potholing is not feasible.

6. Documenting Utility Operator Marks, Potholes, and Communicating the Results of Potholing

The excavator records utility operator field marks, including through photographs. The photographs of field marks include reference information where feasible, especially of surface indicators. The excavator records buried facility location information in pothole maps or logs, including depth and any appurtenances that could interfere with the excavation or clearances of the new construction. The excavator adds a locating device, such as a marker ball or other tag when unmarked facilities are identified in all potholes that contain unmarked facilities.

The excavator conveys the results of potholing, and all facilities identified, to all work crews, contractors, and subcontractors working in or near the excavation zone.

Discussion: Effective documentation allows project participants to understand when a problem is identified later and what the source(s) of that problem may have been. Adding a locating device to previously unidentified facilities will assist in locating facilities after potholes are filled.

Public Comments (Section 6)

- Backfilling potholes with sand is a sufficient best practice; marker balls or other locating devices are unnecessary.

- Maintaining records or documenting third-party utility infrastructure should not be required; responsibility for facility records lies with the utility operator.
- Methods of recording utility operator field marks should be left to the excavator; requiring specific formats, marker balls, or widespread dissemination of potholing results is excessive and burdensome.
- Detailed collection, logging, and mapping of facility information imposes a significant administrative burden, may slow construction, and could increase costs that are ultimately passed to customers.
- Sharing information from potholing is useful, but determining pothole frequency is more critical; legal requirements (Gov. Code 4216.2) already obligate each excavator to delineate and obtain tickets, which cannot be replaced by sharing information.
- Requiring excavators to locate or pay for unmarked subsurface installations creates potential legal exposure and should remain the responsibility of the utility operator.
- The intent of the standard should be clarified regarding whether excavators must provide photographs and documentation to each utility operator.
- Safety benefits from extensive documentation may not justify the costs and additional workload, including the need for larger surveying teams and post-processing of data.

7. Identification and Protection of Sewer Laterals

The excavator examines nearby structures, such as homes and businesses, and surface markings, such as sewer manholes, to determine whether sewer laterals may be in the area of excavation. If sewer laterals are determined to exist, the excavator will look for surface indicators indicating the location of sewer laterals, including cleanouts. Sewer laterals will be protected in the same manner as other buried facilities, unless the excavator comes to an agreement with the owner of the sewer lateral. Any such agreement should be in writing and affirmed by both parties.

Discussion: Government Code section 4216 exempts owners of storm drains and sewer laterals from needing to mark them. Most sewer laterals in California are owned by the property owner, rather than the sanitary district. Therefore, it may be difficult for an excavator to collect information records regarding sewer laterals. As the sewer lateral is usually property of the property owner rather than the sewer agency, the excavator must protect the sewer lateral in the absence of any agreement with the property owner.

Public Comments (Section 7)

- Cleanouts may not accurately indicate lateral location once they enter private property, making them unreliable for excavation planning.
- Limit the excavator's responsibility to public rights-of-way; identification and protection of private sewer laterals should remain the responsibility of the property owner or utility.
- Project owners or contractors, not excavators, should handle agreements or exceptions regarding sewer laterals.
- Sanitary departments should mark public sewer laterals, and excavators should rely on property owner-provided markings or maps for private laterals to improve safety

and reduce liability.
- Sewer laterals may be difficult or impossible to locate due to incomplete records, abandoned lines, or lack of owner knowledge; requiring excavators to do so increases hazard risk and is often impractical.
- Reliable locating methods, such as lateral-launching CCTV with sonde technology, could be referenced for documentation, but should remain optional and under the responsibility of the utility or property owner.
- Including private sewer laterals in the potholing standard is unnecessary, as non-pressurized lines are exempt under Gov. Code 4216, and responsibility primarily rests with the owner or utility operator.

8. Operator Responds to Excavator Request for Additional Information About the Location of a Subsurface Installation

An excavator contacts the operator when an excavator needs assistance determining the exact location of subsurface installation. This information may include the depth of the facility, if known.

Discussion: Gov. Code Section 4216.4(b) requires that an excavator request additional information from operators if the excavator cannot locate a subsurface installation using hand excavation, or by using approved exceptions to hand tools per 19 CCR section 4501. In addition, Gov. Code section 4216.4(b) requires an operator to provide relevant existing additional information to the excavator within one working day. If the excavator has questions about the markings that an operator has placed, the excavator may contact the notification center to request the operator contact the excavator directly. The regional notification center is required to provide the excavator with the contact telephone number of the subsurface installation operator. The information provided by operators to excavators in these situations may include ~~a~~ depth. Depth information provided to the excavator about a subsurface installation is not a substitute for the excavator exercising reasonable care during excavation.

Public Comments (Section 8)
- Gov. Code 4216.4(b) does not require utilities to provide depth information; depth should only be shared when known, non-confidential, and limited to record drawings.
- The one-day timeline for operators to provide additional information is often impractical and may create construction delays if operators are unavailable.
- The requirement is largely irrelevant to potholing standards and may be better addressed elsewhere; operator response obligations do not need to be part of this standard.
- Clarify the intent of this section, as it is unclear whether it is already covered by existing Gov. Code 4216.4 and related CGC requirements.

General Public Comments
- Compliance with the standards will increase project costs, which will likely be passed on to project owners.

- Potholing and subsurface conflict resolution should ideally be performed by the project owner during the design phase, not by the excavator immediately prior to excavation.
- The project owner, rather than the excavator, should be responsible for performing Subsurface Utility Engineering (SUE) and providing high-quality design information.
- Excavators may need to hire SUE engineers if required, and the resulting information should remain the excavator's property for their use only.
- CGA Best Practices dictate that the project owner determines required Quality Levels and the effort expended by the SUE provider; the draft standard should align with these practices.
- The draft standard should be positioned as a "best practices" guidance document rather than mandatory regulatory standards.
- The term "standard" implies minimum legal compliance; the draft lacks precise metrics to support this designation.
- Many provisions in the draft go beyond potholing and include items not directly relevant to excavator responsibilities.
- Field crews already follow strict safety and regulatory protocols; adding additional mandated procedures could slow project delivery and increase liability risk.
- Contradictory language exists regarding who determines potholing locations, excavators or operators, which could create disputes and delays; a clear and consistent standard is needed.
- Proposed requirements could introduce liability, slow project delivery, and impose administrative burdens on public agencies.
- Roles and responsibilities should be clearly defined; excavators should not be responsible for operator information gaps, private property, or communications outside their contractual chain.
- Excavators must have a single point of contact (the entity with whom they are contracted), and utility operators should have a single point of contact through the 811 system.
- The draft standard fails to provide guidance on reasonable care or potholing frequency, which should be addressed as part of confirming subsurface installations.
- Third-party excavators, who rely primarily on design plans or 811 markings, should be a primary target audience for the potholing standard.
- The stated goal of the draft ("address excavating around subsurface installations") is too broad; the focus should be on confirming the location of subsurface installations through potholing.
- The format of the draft, including Attachment A and the "discussion" sections, is unclear and should explicitly define intent and implementation.
- The draft blurs the line between the responsibilities of the project owner (providing design and SUE information) and the excavator (confirming locations for safety), which should be clarified.
- Utility operators may face impractical workloads due to an anticipated increase in information requests under the proposed standard.
- Many utilities in congested rights-of-way could require repeated potholing, potentially increasing costs and delays exponentially.

- Clarification is needed on whether potholes are intended for future reference or if each excavator must pothole every distinct underground utility.
- Surface features (manholes, valve covers, vaults, pullboxes, etc.) can assist in identifying utilities, and the standard should acknowledge their role in reducing unnecessary potholing.

Stakeholder Feedback and Demonstrated Need

During the public comment period, commenters consistently raised the following issues:
1) cost and administrative burden (e.g., documentation mandates, marker balls, repeated potholing in dense corridors).
2) role clarity and accountability (project owner vs. excavator vs. operator).
3) flexibility versus prescription (minimum depth/frequency rules versus professional judgment tied to conditions).

Commenters also flagged legal and operational frictions (e.g., private sewer laterals; practicality of one-day information turnarounds; potential for duplicative or unclear requirements). Collectively, these comments demonstrate ongoing uncertainty about roles, expectations, and terminology. They reinforce the need for continued clarification, education, and refinement of a guidance-based approach rather than new regulatory mandates.

Key Themes from Stakeholder Feedback

Cost and Administrative Burden. Commenters cautioned that suggesting add-ons (e.g., marker balls, extensive mapping, fixed depth margins) could slow delivery and escalate costs, especially in congested corridors requiring repeated exposures.
Potential Solution: Treat documentation and device placement as context-dependent guidance, applied when project conditions warrant additional verification measures, rather than suggesting the same level of documentation for all excavations. This distinction maintains the statutory requirement that excavators must determine the exact facility location for every dig, while allowing flexibility in how supplemental practices (e.g., photologs, marker balls, or mapping) are used to meet that goal.

Flexibility vs. Prescription. Commenters expressed concern that the draft potholing standards could be interpreted as too prescriptive, citing the inclusion of fixed minimum locations or frequencies for exposures. They emphasized a preference for greater discretion by designers and excavators to apply potholing based on project conditions.
Potential Solution: Develop a condition-based decision structure that helps project owners, designers, and excavators determine where potholing is most critical based on observable site factors, such as conflict likelihood, facility congestion, facility type, soil or cover variability, and record accuracy. Under this approach, staff would provide example decision matrices showing how these factors can be weighed to guide field decisions, rather than prescribing uniform minimum intervals (e.g., a fixed 12-inch depth margin). This decision structure would be implemented as guidance within the proposed standard and accompanying templates, allowing project teams to document their rationale for each potholing decision while maintaining statewide consistency.

Roles and Accountability. Stakeholders asked for clear delineation among project owners (SUE at design), operators (marking and records), and excavators (confirmation for safe excavation).
Potential Solution: Clarify language in the Roles and Responsibilities section of the draft standard to emphasize that potholing applies to construction-phase confirmation of facility locations, not to design-phase SUE obligations. Staff should also reinforce references to the contractual chain and 811 system as the appropriate points of coordination between project owners, operators, and excavators.

Legal and Operational Friction Points. Examples include private sewer laterals and expectations for additional operator data within one business day.
Potential Solution: When potholing is infeasible or unsafe (e.g., private laterals, embedded lines), allow documented alternative verification methods and ensure the standard aligns with the Dig Safe Act (Gov. Code §§ 4216 et seq.) so as not to expand operator obligations.

Policy Design Considerations

This section outlines the policy design considerations that will guide staff as they revise the draft potholing standards into a practical, project-based decision structure. It describes how staff intend to use stakeholder feedback, committee direction, and statutory requirements to shape the future standards' purpose and scope, role definitions, decision structure, documentation expectations, and feasibility exceptions, in a way that remains consistent with the Board's authority under Government Code section 4216.18 and the Dig Safe Act (Gov. Code §§ 4216 et seq.), while improving consistency in how potholing is used to confirm subsurface installations across projects and jurisdictions.

Purpose and Scope. Define the standards' focus as confirming subsurface installations through potholing and related verification methods to reduce damage risk during excavation. The scope applies to all excavation activities covered by the Dig Safe Act (Gov. Code §§ 4216 et seq.), but the standards themselves address only the verification of underground facility locations. They do not address the broader means or methods of excavation governed by other laws and regulations. The guidance clarifies how excavators and designers can meet their existing duty to determine the exact location of subsurface installations, establishing consistent expectations for documentation, coordination, and safe verification.

Roles. Project owner: provide design-phase SUE commensurate with project risk; Operator: mark and share existing information per statute; Excavator: apply project-based potholing to confirm conflicts and clearances.

Project-based decision structure. Example factors: crossing density; parallel/stacked lines; material criticality; soil/cover variability; presence of surface indicators; accuracy/age of records. This structure points to where/when to pothole (e.g., proposed/existing crossings, suspected direction changes) without mandating fixed intervals everywhere.

Reasonable documentation. Photologs/notes are encouraged where they materially improve crew coordination; no blanket requirement for marker balls or full mapping outside defined triggers.

Feasibility exceptions. When potholing cannot be performed (e.g., embedded in concrete, waterways), require a documented risk-mitigation meeting among responsible parties (allow programmatic/blanket agreements where appropriate) before proceeding with non-hand excavation methods.

Alignment with previous standards. Reference ASCE-38 quality levels for design-phase clarity while avoiding misapplication during construction; point to CGA locate-verification and documentation best practices; avoid duplicating operator response obligations already in statute.

Potholing and Planning and Design Committee Response to Public Comments

Following receipt of public comments, staff presented feedback to the Board's Potholing and Planning and Design Committee for review. The Committee provided guidance on each section of the draft standards, emphasizing the need to balance clarity, practicality, and scope. Their recommendations are summarized as follows:

Discretion and Flexibility: The Committee advised that potholing requirements should remain at the discretion of the designer or excavator rather than being prescriptive. While potholing is essential to reduce utility conflicts, the standards act as guidelines rather than mandates on when and where potholing occurs.

Coordination Responsibilities: Several sections addressing verification and operator communication were viewed as overly prescriptive. The Committee recommended streamlining coordination steps by reducing redundant confirmations and focusing verification and operator outreach on higher-risk conditions or situations where marks or records are unclear, inconsistent, or require additional coordination.

Technical Clarifications: The Committee suggested maintaining a consistent two-foot clearance between excavation and the marked underground facility, while eliminating unnecessary design-phase requirements that fall outside the Board's regulatory authority. They also recommended that references to ASCE 38-22 Quality Levels C and D be further researched and contextualized for appropriate application.

Scope Adjustments: The Committee supported removing or consolidating sections that were redundant or impractical, such as requirements for marker balls, sewer lateral identification, and additional documentation burdens that extend beyond excavator responsibility.

Next Steps: The Committee suggested staff revise the draft standards to clarify roles between project owners, designers, and excavators; reduce administrative burdens; and focus on essential potholing practices that enhance safety without micromanagement, and to circulate them for additional stakeholder review.

RECOMMENDATION

Staff recommend the Board receive this update and provide feedback on staff's proposed direction to revise the draft potholing standards. Staff will continue stakeholder engagement as part of the ongoing refinement of the draft potholing standards. Consistent with the approach outlined in this report, staff will develop revised standards that clarify roles, focus on confirming subsurface installations, and direct effort where risk is highest.

Specifically, staff will produce revised standards that include:

- Narrowing the scope to potholing for location confirmation.
- Defining roles (owner/design SUE; operator marking/records; excavator confirmation).
- Replacing fixed, across-the-board depth and frequency rules with condition-based example matrices.
- Treating documentation and locating devices as triggered recommendations.
- Feasibility exceptions and programmatic agreements for situations where potholing cannot be performed.

Given the extensive requirements in Senate Bill 254 and the associated statutory deadlines, staff also recommend a measured approach to revising the standards to allow for a thoughtful and thorough process that results in guidance for excavators that is grounded in operational practices and promotes worker and public safety.