California Underground Facilities Safe Excavation Board

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Agenda Item No. 13 (Information Item) – Staff Report

Locator Workload Threshold

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SUMMARY
The Underground Safety Board (Board) is revisiting the issue of 811 ticket volume volatility and its impact on utility locator workload. This issue was initially identified in a 2021 staff report[1], where analyses showed that even a small percentage of excavators choosing later start dates could "dramatically reduce workload volatility at a system-wide level". However, implementation of solutions proved challenging, and this policy initiative was postponed.

Recent legislative action (Senate Bill [SB] 254) now requires the Board to address this issue. SB 254 amended Government Code §4216.1[2] to direct the Board, through regulation, to determine whether and under what circumstances an excavator must provide more than two working days' notice when that excavator is submitting a volume of concurrent notifications that exceeds the capacity of operators in the area to complete locates within the minimum legal start time. In line with this mandate, the Board is assessing how surges in ticket submissions (particularly from high-volume excavators) jeopardize timely locate-and-mark and what regulatory measures could prevent workload overloads.

This report summarizes the issue's origin and outlines potential solutions (e.g., daily ticket caps, early notification triggers, regional forecasting) to manage volatile ticket volumes and promote safe excavation. Staff recommend that the Board provide initial feedback on the proposed approach for developing the Locator Workload Threshold regulations required by SB 254.

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

[1] Measuring Ticket Volatility and Estimating Locator Workload (Board Meeting - November 9, 2021, Agenda Item 7).
[2] Government Code section 4216.1(b)(2) (as amended by SB 254) (California Legislative Information: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=4216.1)

BACKGROUND

The challenge of inconsistent 811 ticket volumes and its effect on timely utility markings first came to the Board's attention in 2021. In November 2021, staff presented an analysis titled "Measuring Ticket Volatility and Estimating Locator Workload," which used regional notification center (RNC) data to simulate locator workloads. The findings highlighted that minor changes in excavator behavior can significantly even out daily workload peaks. For example, modeling showed that if even a small fraction of excavators request start dates later than the legal minimum, it can dramatically reduce day-to-day workload volatility for locators. This improves the consistency of locate demand and helps prevent days when locators are overwhelmed. The 2021 report also noted that volatility is especially challenging for smaller operators with limited staffing, and that large excavators (like major utilities and their contractors) should coordinate with RNCs on large projects to give operators advance notice of unusually high upcoming ticket volumes. The 2021 analysis noted that additional information on excavator notification practices would be needed before recommending specific policy options.[1 above]

Building on the 2021 findings, the Board initiated a scoping effort under the Board's 2024 Workplan to develop measures for managing ticket volume surges. Board staff observed that locator workloads are driven by excavators' notification behavior and can fluctuate unpredictably, making staffing difficult. Operators reported significant month-to-month swings in tickets received, illustrating how sudden spikes can overwhelm marking crews. The Board recognized that although operators are responsible for maintaining sufficient resources to meet locate-and-mark obligations, highly concentrated surges caused by high-volume submissions over a short timeframe can strain even appropriately staffed operations, which supports determining solutions that improve predictability and coordination. By reducing volatility, the system can reduce sudden workload peaks that contribute to late markings. Operators who still fail to meet their two-working-day marking obligations under steady-state conditions would remain accountable for understaffing. The scoping effort outlined data analysis and stakeholder outreach tasks to investigate high-volume ticket submissions and potential interventions (e.g., limits on ticket counts, better scheduling tools, or voluntary best practices). Due to practical challenges and resource constraints, this work was postponed before regulations or standards could be drafted; however, the underlying workload volatility and resulting late-marking risk remain a recurring concern for the Board and stakeholders.

In the Board's 2022 Annual Report to the Governor and Legislature, the Board recommended enhanced advance-notification and coordination measures for high-volume notifications.

In January 2025, the Legislature enacted SB 254, which amended Government Code section 4216.1 and directed the Board to address this issue through regulation, as described in the Discussion section below.

Problem Statement: When large numbers of excavation notifications are submitted in a short time frame, such as during major infrastructure projects or by high-volume excavators, local operator workloads can spike beyond what area marking crews can reasonably complete within the minimum legal start time. These unpredictable surges can lead to late markings, strained resources, and increased safety risk if excavation proceeds without complete and

timely markings.

DISCUSSION

SB 254 Direction and Regulatory Task: Government Code section 4216.1(b)(2) directs the Board to determine through regulation, under what circumstances an excavator must notify the RNC more than two working days before excavation. This requirement applies when the excavator is submitting a volume of concurrent notifications that exceeds the capacity of operators in the area to complete their locate responsibilities within the minimum legal excavation start date and time. To implement this directive, the regulations will need to specify how key concepts are defined and applied in practice, including the relevant "area," how "concurrent notifications" are measured, and what constitutes "in excess of capacity," and establish a set of conditions for when mandated earlier notification is required. Government Code section 4216.1 further provides that the regulations shall not restrict an excavator's ability to submit standard or emergency notifications and requires the Board to adopt implementing regulations by July 1, 2027.

Regulatory Design Considerations: In developing a workable threshold and conditions for when earlier notification is required, the Board will need to balance excavator scheduling needs with operator capacity and public safety. Considerations may include the number of notifications submitted by a single excavator over a defined period, the concentration/density of requests within a defined area, and practical indicators of local capacity (e.g., available locator resources and operational constraints). The goal is a threshold that triggers additional lead time and coordination for high-volume conditions, without unduly burdening routine work or restricting emergency notifications.

Potential Solutions: To fulfill the mandate and address the workload volatility issue, staff has identified several potential regulatory approaches for the Board's consideration. These are not mutually exclusive and could be combined as needed. Key options include:

- **Daily Ticket Submission Limits:** Establishing a maximum number of excavation tickets that a single excavator (or project) can have due for locate within a given day or two-day period. For example, the Board could set a threshold (to be determined through analysis) on how many tickets per excavator/project can be requested to start within the same 48-hour window. This would encourage excavators with large projects to spread out their notifications over more days. At this stage, no specific number is proposed. Any limit would be developed based on available data and stakeholder input to prevent any one excavator from overloading the system on a single day.

- **Early Notification Requirements for Surges:** Requiring excavators to provide longer lead time if they plan to submit an unusually high volume of tickets. In practice, this might mean that if an excavator knows they will be submitting a large number of tickets (e.g., for a big subdivision trenching project or multiple jobs at once), they must notify the RNC more than two working days in advance (perhaps 5 days, or a week ahead, depending on the volume). This aligns with the directive in Gov. Code §4216.1(b)(2) that calls for early notification when concurrent ticket volume exceeds operator capacity.

Such a rule would give utility operators additional time to assign staff or adjust schedules to meet the demand. The Board would need to define the volume threshold and the extended notice period through regulation.

- **Regional Workload Forecasting Triggers:** Developing a system (potentially in coordination with the RNCs) to monitor and forecast ticket volumes in each area. If a surge is predicted, for instance, via an uptick in tickets scheduled or historical patterns (like spring construction booms), the RNCs or operators could issue an alert or trigger special procedures. Regulatory options might include requiring RNCs to alert the Board or member operators when ticket volume in a region is projected to exceed a certain threshold. Essentially, this would formalize an early warning system and protocol for areas facing unusual increases in tickets.

- **Improved Coordination and Innovative Measures:** Exploring other creative solutions to even out locator workload and encouraging coordination between excavators and operators. One idea previously noted by Board staff is the use of "project tickets" or phased notification for large, long-duration projects. For example, rather than submitting 100 separate tickets all at once for a big project, an excavator might file a project notification that outlines the overall scope and schedule, allowing operators to plan and allocate locate resources more effectively over time. Similarly, the Board could consider requiring technology tools that help excavators spread out their notifications (such as scheduling software or ticket management systems) and integrating those tools with RNC systems. Any measures that encourage excavators to voluntarily stagger their ticket requests, or that facilitate communication regarding scheduling large volumes of locates, could be part of the solution. The Board may also look at successful practices in other states or industries for managing locate workload peaks (for instance, special handling procedures for major infrastructure projects).

It is important to note that these potential solutions would require careful analysis and stakeholder input, potentially through a survey, public comment period, or workshop. Imposing a hard cap or new requirements has implications for excavators (who need flexibility in planning work) and for RNCs (which would implement any new rules in the ticketing process). The Board will need to assess the impact of any threshold on project timelines and ensure that rules are fair and do not unintentionally discourage use of the one-call system. The focus should remain on collaboration and predictability: getting excavators, RNCs, and utility operators to work together so that locate requests can be fulfilled safely and on time, even when volumes are high. Early communication and planning will be key. As the 2021 simulations indicated, even modest changes in notification timing can significantly reduce volatility, so the aim is to capture those benefits through structured policies.

Continuation of Previous Efforts: The initiatives discussed above are a direct continuation of work the Board has already contemplated. Previous efforts on this topic laid out many of these questions (e.g., examining whether ticket limits would help, how excavators prepare large batches of tickets, and how ticket submission rules affect behavior). Although the project was delayed, the analysis and stakeholder engagement envisioned in the 2024 scoping effort now

provide a roadmap for moving forward under the SB 254 mandate. For example, staff had planned to work with the Board's Ticket Process Committee to identify ticket attributes that drive workload increases and to simulate how various restrictions or changes would affect volatility. Going forward, the Ticket Process Committee would be engaged to assist in defining the operational thresholds (e.g. the exact number of tickets or geographic density that constitutes an overload situation), modeling the impacts of potential regulations, and possibly piloting new coordination procedures with willing excavators and operators. The Ticket Process Committee can provide a forum to vet feasibility and implementation issues before staff advances draft regulatory language. Broader stakeholder input will also be critical: excavators (including those who frequently submit large ticket volumes), utility locators, RNC representatives, and other affected parties will have opportunities to provide feedback as regulations are developed. Early collaboration can help surface any concerns and refine the approach to be both effective and practical.

Stakeholder Survey: Staff will release a stakeholder survey following the February Board Meeting to gather input on the frequency and operational impacts of ticket surges, excavator notification practices that contribute to concurrent ticket volumes, and stakeholder perspectives on potential solution types (e.g., earlier notification triggers, phased/project coordination approaches, and daily volume controls), including potential unintended consequences and implementation considerations.

Draft Regulations Workshop: Staff will convene a public stakeholder workshop after circulating draft regulations to provide a structured opportunity for operators, excavators, locators, and RNCs to discuss the proposed approach, raise feasibility and implementation concerns, and identify potential unintended consequences. The workshop will focus on practical operational details needed to implement Government Code § 4216.1(b)(2), including workable definitions (e.g., "area," and "in excess of capacity"), trigger mechanics for earlier notification, and how the proposal can improve predictability and coordination without restricting submission of normal or emergency tickets. Input received during the workshop will be summarized and used to refine the draft regulations prior to Board approval.

SB 254 Development Plan:

To support transparency, coordination, and consistent stakeholder participation, staff have created the following Development Plan outlining upcoming key activities and milestones that will guide development of the Locator Workload Threshold regulations. This roadmap demonstrates how the Board will meet statutory obligations under SB 254 Government Code §4216.1(b)(2) while providing clear opportunities for public and industry involvement at each stage. Additional stakeholder engagement may be conducted as necessary.

Action	Purpose	Estimated Date	Audience
Survey: Workload Threshold and Ticket Surge Solutions	Gather input on (1) the frequency and operational impacts of ticket surges/marking delays, (2) excavator notification practices that contribute to concurrent ticket volumes, and (3) stakeholder perspectives on potential solution types (e.g., earlier notification triggers, phased/project coordination approaches, and daily volume controls), including potential unintended consequences, and implementation considerations.	February 2026	All stakeholders, including operators, excavators, locators, and RNCs
Ticket Process Committee: Define Threshold Concepts and Feasibility Considerations	Refine potential locator workload threshold options (e.g., possible trigger definitions and measurement approaches) and feasibility considerations informed by survey responses; identify implementable pathways consistent with §4216.1(b)(2).	March 2026	Ticket Process Committee
Board Item: Locator Workload Threshold Draft Regulations	Present draft regulations and receive Board and stakeholder comments.	April 2026	Board and stakeholders
Public Comment Period: Draft Regulations	Provide an opportunity for written input on the draft regulations.	April–May 2026	All stakeholders, including operators, excavators, locators, and RNCs
Workshop: Draft Regulations	Provide an opportunity for stakeholders to discuss and provide feedback on draft regulations.	May 2026	All stakeholders, including operators, excavators, locators, and RNCs
Board Item: Regulations for Approval	Present proposed regulations for Board approval.	July 2026	Board and stakeholders

As this process moves forward, stakeholders are encouraged to stay informed and actively monitor Board communications for survey announcements, public comment opportunities, and draft releases. Because SB 254 establishes a defined timeline for regulatory development, stakeholders who wish to be involved are encouraged to engage early and consistently, as input gathered in the coming months will inform the Board's direction.

RECOMMENDATION

Staff recommend that the Board provide initial feedback on the proposed approach for developing the Locator Workload Threshold regulations required by SB 254, including whether the Board agrees with the overall direction and any key considerations, additions, or modifications the Board would like staff to explore as this work progresses.