
California Underground Facilities Safe Excavation Board

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Agenda Item No. 15 (Information Item) – Staff Report

“No 811” Pilot Program Update

PRESENTER

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SUMMARY

In the fall of 2023, the Underground Safety Board (Board) Investigations staff launched a pilot program to investigate “No 811” damages, or cases in which an underground facility was damaged without an 811 ticket. Staff partnered with two gas operators to pilot the program and investigate instances of “No 811” damages to their facilities. In mid-2024, staff upgraded the notification process and developed an online survey for excavators. In 2025, staff implemented a triage process for “No 811” notifications, and in 2026, staff intend to add another operator to the program before opening the program to gas operators statewide.

STRATEGIC PLAN

2020 Strategic Plan Objective: Improve Compliance by Reaching Parties in Effective Ways
Strategic Activity: “No 811” Pilot Program

BACKGROUND

Purpose of the “No 811” Pilot Program

The “No 811” Pilot Program was developed to address a critical limitation in California’s excavation damage reporting framework: the Board does not have a reliable or comprehensive way to identify excavation damages that occur without an 811 ticket.

Under existing statute¹ and the Board’s regulations in Title 19² excavators are required to report excavation damages to the Board. When excavation occurs without an 811 ticket, damage is less likely to be reported by excavators already out of compliance and, as a result, is often not reported to the Board. This creates a systemic data gap that limits the Board’s ability to understand the full scope, causes, and characteristics of excavation damage occurring without notification.

¹ [Government Code § 4216.4](#)

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

At the same time, facility operators raised concerns to the Board that a significant number of damages to their facilities were occurring without an 811 ticket. Operators reported that the no-ticket damages were frequently identified during repair work but were not consistently captured through existing reporting mechanisms.

In response to both the identified reporting gap and stakeholder feedback, the Board developed the “No 811” Pilot Program to create a voluntary reporting pathway for operators.

Pilot Program Objectives

Consistent with this purpose, the objective of the “No 811” Pilot Program is to:

- Intake and evaluate no-ticket damage notifications that would otherwise not be captured 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.

Statutory Context

Government Code Section 4216.4(c)(3) requires excavators to notify the appropriate regional notification center after discovering or causing damage to a subsurface installation.

Title 19 CCR Section 4100 provides additional conditions on excavators notifying the regional notification center for damages to natural gas and hazardous liquid pipelines, such as requiring that notification occur within 2 hours, and requires each regional notification center to transmit that data to the Board.

Both requirements apply only to excavators. Board regulations³ do not require operators to report damages to the Board.

DISCUSSION

Damage Reporting and Visibility Gap

As described in the Background, existing reporting mechanisms do not reliably capture excavation damages occurring without an 811 ticket, limiting the Board’s visibility into this kind of damage. The “No 811” Pilot Program is intended to begin closing this gap by identifying damages that would otherwise go unreported.

Common Ground Alliance Data

CGA intakes data voluntarily reported by excavators and operators on underground facility damages, which includes reports from California.

In 2024, the CGA Damage Information Reporting Tool (DIRT) Explorer dashboard showed that 34.0% of reported damages (3,043 total) listed the root cause as “No notification made to the One-Call Center” out of a total of 8,944 unique damages reported.⁴ This finding is

³ [19 CCR § 4100. Damage Notification by Excavators](#)

⁴ CGA DIRT Dashboard. <https://commongroundalliance.com/DIRT-Dashboard>. Accessed December 30, 2025.

consistent year-to-year as seen below.⁵

<i>CGA DIRT Explorer</i>	Total Reported Damages in California	Reported Damages in California Root Cause “No Notification...”	“No Notification...” Percentage of Total
2022	8,944	3,043	34.0%
2023	7,799	2,935	37.6%
2024	7,117	2,709	38.1%

Regional Notification Center Data

There is also underground facility damage data recorded by the regional notification centers in the form of damage tickets reported by the excavator to the regional notification center.

In 2023, USA North 811 reported 2,197 damages, while DigAlert reported 2,910, for a combined total of 5,107.⁶ This is consistent year-to-year.⁷

<i>Regional Notification Center Data</i>	USA North 811 Damage Tickets	DigAlert Damage Tickets	Combined Regional Notification Center Damage Tickets
2023	2,197	2,910	5,107
2024	2,538	2,911	5,449
2025 (to Q3 2025)	2,578	2,136	4,714

Damage Reporting to the Board

The Board’s case management system, DigCase, receives damage and complaint notifications from excavators, operators, and the public that serve as the basis of Board investigations. However in 2023 and 2024, the Board received only a fraction of the damage notifications reported to CGA and the regional notification centers, averaging about 16% of those reported to CGA and about 22% of those reported to the regional notification centers.

	CGA Total Reported Damages in California	CGA “No Notification” Root Cause Damages Reported in California	Regional Notification Center Combined Total Damage Tickets	Total Damages Reported to the Underground Safety Board	Percentage of Damages Reported to the Board Compared to Regional Notification Centers	Percentage of Damages Reported to the Board Compared to CGA
2023	7,799	2,935	5,107	1,177	23%	15%
2024	7,117	2,709	5,449	1,119	21%	16%
2025	<i>No data</i>	<i>No data</i>	4,714 (to Q3)	1,492	32%	N/A

⁵ CGA DIRT Dashboard. <https://commongroundalliance.com/DIRT-Dashboard>. Accessed December 30, 2025.

⁶ 2023 data in this section from the [Notification Center Update to the Underground Safety Board, April 8, 2024](#).

⁷ 2024 and 2025 data in this section from the [Notification Center Update in November 2025](#) to the Underground Safety Board.

Process Improvement: Intake Quality and Investigation Prioritization

To responsibly manage limited investigative resources while improving information quality, staff implemented an internal triage process in 2025 for all “No 811” pilot notifications. Each notification is reviewed upon submission to determine whether it contains sufficient first-hand information to substantiate that excavation occurred without an 811 ticket and to identify the parties involved for investigation.

This internal process allows staff to:

- Prioritize notifications with verifiable information,
- Apply investigative discretion consistently,
- Reduce time spent on unsubstantiated cases, and
- Focus enforcement efforts where safety risks can be demonstrated.

The triage process is an internal operational tool and does not establish any new reporting requirements for industry participants.

Program Metrics and Measures of Success

Primary Safety Outcome

The program’s effectiveness depends on collaboration with operators who voluntarily report no-ticket damages, allowing the Board to identify, investigate, and address excavation activity that would otherwise remain outside existing reporting systems.

Supporting Metrics

Because no-ticket damages are historically underreported, staff evaluates pilot performance using leading indicators that precede measurable safety outcomes.

These include:

Visibility and Detection

- Number of no-ticket damage notifications identified
- Improved identification of no-ticket damages relative to existing reporting channels

Intervention and Accountability

- Investigations opened
- Education orders and financial penalties issued
- Referrals to licensing and regulatory partner agencies
- Engagement through surveys, interviews, and education

Program Feasibility

- Staff workload impacts,
- Effectiveness of intake prioritization

- Resource considerations for potential statewide implementation

Early Safety Outcomes and Behavioral Change (Documented)

Early evidence from the pilot program demonstrates that education and enforcement actions are influencing behavior at the company level.

In multiple cases, respondents stated that they were unaware of Dig Safe Act requirements or confused about what activities constituted excavation requiring an 811 ticket. These statements were documented through:

- statements made on the record during Board enforcement proceedings,
- Board investigation interviews, and
- follow-up communications after enforcement actions, including during participation in the Board's education course.

In several cases, respondents provided documentation demonstrating corrective actions taken after becoming aware of their obligations, including:

- updates to internal company policies and procedures,
- implementation of recurring or monthly safety talks,
- clarification of excavation and notification responsibilities, and
- incorporation of 811 compliance into standard operating practices

In response to NOPV N247166, Verne's Plumbing notified the Board that they added a review of the 811 ticket to the pre-plan for each day and added 811 reminders to excavation equipment with stickers and keychains.⁸

In response to NOPV 23NTS0026, Streamline Construction notified the Board that they added to their procedure to notify DigAlert themselves as a general contractor.⁹

In response to NOPV N250371836, Modern Muse Construction notified the Board that they updated their procedures to include the ticket requirement and to report gas facility damages to 911, as well as provided training to project managers and field staff.¹⁰

While these early indicators do not yet demonstrate a statewide reduction in no-ticket damages, they do represent leading safety signals that are expected to precede measurable reductions over time.

Current Pilot Results (as of December 29, 2025)

As of December 29, 2025, the Board opened 184 investigations. Out of 164 excavator surveys sent, 136 survey responses were received from excavators and 11 phone interviews occurred with Board investigators for a total response rate of 72%.

⁸ [Verne's Plumbing Response to NOPV N247166](#)

⁹ [Streamline Construction Response to NOPV 23NTS0026](#)

¹⁰ [Modern Muse Construction Response to NOPV N250371836](#)

In 2024 and 2025, the Board issued Board Decisions on 39 Notices of Probable Violation (NOPVs). The Board recommendations include a total of \$71,000 in financial penalties and taking the Board’s education course.

	Data to December 29, 2025
Notifications	309 (including 4 duplicates)
Notifications Triaged	162
Investigations Opened	184
Surveys Sent	203
Excavator Responses	147 (including 11 phone interviews)
Excavator Response Rate	72%
Notices of Probable Violation	39
Board “No 811” Decisions	39
Recommended Financial Penalties	\$71,000

“No-811” Pilot Program NOPVs and Board Decisions

Case #	Hearing Date	Board Action
23NTS0002	7/8/2024	Education
23NTS0020	7/8/2024	Education and \$1,000
CAS-01566-L3N2D0	7/8/2024	Education and \$1,000
CAS-01575-B9F6K1	7/8/2024	Education and \$1,000
23NTS0002	4/14/2025	Education and \$1,000 fine
23NTS0019	4/14/2025	Education and \$1,000 fine
23NTS0024	4/14/2025	Education and \$1,000 fine
23NTS0024	4/14/2025	Education and \$1,000 fine
23NTS0024	4/14/2025	Education and \$1,000 fine
CAS-01557-P3T1F7	4/14/2025	Education and \$1,500 fine
23NTS0015	7/14/2025	Education and \$1,000 fine
23NTS0016	7/14/2025	Education and \$5,000 fine
N2421941	7/14/2025	Education and \$5,000 fine
N2424954	7/14/2025	Education
N242694	7/14/2025	Education and \$8,000 fine
N2427573	7/14/2025	Education and \$2,000 fine
N2427761	7/14/2025	Education and \$1,000 fine
N2428369	7/14/2025	Education and \$1,000 fine
N24284	7/14/2025	Education and \$2,000 fine

N242980054	7/14/2025	Education and \$1,000 fine
N243160941	7/14/2025	Education and \$2,000 fine
N247224	7/14/2025	Education and \$6,000 fine
N247255	7/14/2025	Education and \$1,000 fine
23NTS0023	11/18/2025	Education and \$1,500 fine
23NTS0023	11/18/2025	Education and \$2,000 fine
23NTS0026	11/18/2025	No violation found
23NTS0026	11/18/2025	Education and \$3,500 fine
N2422214	11/18/2025	Education and \$2,000 fine
N2422939	11/18/2025	Education and \$500 fine
N2424853	11/18/2025	Education and \$3,500 fine
N2424853	11/18/2025	Education and \$500 fine
N2426076	11/18/2025	Education and \$3,000 fine
N242831700	11/18/2025	Education and \$2,500 fine
N247166	11/18/2025	Education and \$4,000 fine
N250371836	11/18/2025	Education and \$500 fine
N250381136	11/18/2025	Education and \$3,000 fine
N250381136	11/18/2025	Education
N250381136	11/18/2025	No violation found
N250381136	11/18/2025	Education

Next Steps

Staff will continue refining the pilot program, evaluate safety outcomes over time, and assess feasibility and resource needs for potential expansion to additional operators or statewide implementation.

RECOMMENDATION

Staff recommends the Board direct staff to continue improving program processes and adding additional operators to the “No 811” Program to partner with to continue its commitment to reduce “No 811” damages.