

July 3, 2024

Mr. Tony Marino
Executive Officer
California Underground Safety Board
Office of Energy Infrastructure
715 P Street, 20th Floor
Sacramento, CA 95814

REGARDING: SCCA COMMENTS ON USB ITEMS 11 AND 13 FOR THE JULY 2024 BOARD MEETING

Dear Mr. Marino:

The Southern California Contractors Association (SCCA) wishes to express its positions on two upcoming agenda items for the Underground Safety Board's July 8-9, 2024 board meeting. As always, the association appreciates the opportunity to express its interests and preferences to the state.

By way of background, SCCA is an all-union association of engineering contractors with around 300 members. Our contractors serve as both general contractors and subcontractors, depending on the project. SCCA contractors complete approximately 12 million personnel hours of work every year. SCCA members construct projects across the state.

Agenda Item 11: Recommendation to the Governor and Legislature Regarding the Emergency Exemption to 811 Notification

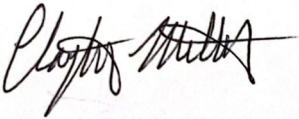
– SCCA generally supports the concept of balancing the needs between responding to an emergency and preserving the 811 notification process, which SCCA believes the recommendation achieves. However, SCCA is concerned that new delineations on the jobsite *after* the emergency has occurred might contaminate the jobsite of critical evidence required to determine fault. SCCA contractors have experienced situations where operators have remarked underground utilities after an emergency and during emergency mitigation efforts. SCCA is concerned these new marks might be used to cover-up inaccurate marks. SCCA therefore requests the board to consider the preservation of evidence for investigation purposes as an additional factor when responding to an emergency.



Agenda Item 13: Notification of Center Membership Termination Processes – SCCA contractors depend on the accurate location and identification of underground utilities in order to provide a safe work environment for our members' workers. While high priority lines would seemingly be the biggest risk to their health and safety, utility lines that are unmarked and undetected truly pose the biggest threat. To that end, SCCA supports the staff recommendation contained in Agenda Item 13 to include utility company information when those companies terminate their membership with one of the 811 notification centers.

Thank you for the opportunity to express our positions on Agenda Items 11 and 13 for the upcoming July 2024 Underground Safety Board Meeting.

Cordially,



Clayton Miller
Government Affairs Manager

