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## California Underground Facilities Safe Excavation Board

July 14-15, 2025

### Agenda Item No. 24 (Information Item) – Staff Report

*Potholing Standards Development Update*

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#### **PRESENTER**

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#### **SUMMARY**

Staff is providing new and updated proposed standards for potholing that reflect public comments and survey responses. Staff recommend requesting public comment on the proposed standards.

#### **STRATEGIC PLAN**

2020 Strategic Plan:<sup>1</sup> Improve Accessibility of Buried Infrastructure Location Knowledge and Understanding

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

#### **BACKGROUND**

The following is a summary of statutes, regulations, and best practices applicable to potholing.

California Government Code (Gov. Code) section 4216.4<sup>2</sup> requires:

- a) Excavators to determine the exact location of subsurface installations using hand tools prior to using any power-driven excavation or boring equipment within the tolerance zone (as defined in Gov. Code section 4216 (u) generally 24” from centerline)

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<sup>1</sup> [Dig Safe Board 2020 Strategic Plan](#)

<sup>2</sup> [Gov. Code section 4216.4.](#)

of subsurface installations. In all cases the excavator must use reasonable care to prevent damage to subsurface installations.

- b) Excavators to notify the regional notification center if the excavator intends to use a vacuum excavation device and that the operator has not objected to its use.
- c) Operators to provide relevant information to excavators if the exact location of a subsurface installation cannot be determined.

Gov. Code section 4216.18 requires the Board to develop standards related to safety practices in excavating around subsurface installations and specifies in Gov. Code section 4216.18(c) that the Board may address what constitutes reasonable care through potholing standards.

California Code of Regulations (CCR) section 4501<sup>3</sup> specifies when an excavator may use equipment other than hand tools within the tolerance zone of a subsurface installation when determining the exact location of the subsurface installation. It further limits the types of tools that can be used and requires the excavator to consult with the operator of the subsurface installation on how to safely proceed using equipment other than hand tools and requires the operator to respond.

The Common Ground Alliance (CGA) *Best Practices*<sup>4</sup> specifies:

- a) CGA 2.3: If potholing was used for information, it is to be noted on plans
- b) CGA 5.15: In order to avoid damaging subsurface facilities, the excavator uses reasonable care, such as potholing
- c) CGA 5.29: When using trenchless excavation and facilities are known to be present but cannot be potholed, the owner and excavator meet to discuss how to safely proceed
- d) CGA 5.32: Provides guidance on when to, how to, and who can perform vacuum excavation

The California Department of Transportation, for public roads and highways, specifies potholes need to be at sufficient intervals to obtain the utility location and alignment with a minimum of two locations. On projects with a high priority line, spacing must not exceed 100 feet for longitudinal utilities and utility crossings with a few exceptions. All test hole<sup>5</sup> locations, including the horizontal location data and elevation, must be recorded within the project limits.<sup>6</sup>

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<sup>3</sup>[California Code of Regulations section 4501](#)

<sup>4</sup>[CGA Best Practices](#) version 21.0.

<sup>5</sup> Test holes are also known as potholes

<sup>6</sup>[California Department of Transportation \(Caltrans\) Project Development Service Manual, Chapter 17, March 14, 2022, pages 33-36](#)

## Board Actions, Workshops, and Surveys

The Underground Safety Board's 2025 *Workplan* states that the "Board will integrate 2024 draft standards for potholing and unmarked lines with new planning and design guidance. Public feedback in 2025 will allow stakeholders, including non-professional excavators, to contribute to the development of comprehensive safety practices that will remedy identified gaps in the process."<sup>7</sup>

Public comments on potholing were collected through the following Board meeting presentations, workshops, and surveys:

- August 2022 Potholing Workshop<sup>8</sup> where staff heard from excavators and operators about what would improve the information they have available to do their jobs.
- July 2023 *Staff Report*<sup>9</sup> to the Board that presented draft potholing standards.
- August 2023 Potholing Committee Workshop<sup>10</sup> where stakeholders identified factors that affected the distance between potholes for parallel excavation, the possibility of specifying a minimum frequency for potholing, and their needs or concerns regarding depth information.
- June 2024 surveys that collected information on the way depth information was used by stakeholders during potholing and the minimum distance between potholes when existing facilities were parallel to the proposed construction.
- September 2024 *Staff Report*<sup>11</sup> to the Board that presented results from two surveys and proposing draft standards: Identification of Potholing Locations, Deeply Buried Facilities - Exceptions to Positive Confirmation, and Operator Response to Excavator request for additional information about the location of subsurface installation.
- April 2025 *Staff Report*<sup>12</sup> to the Board that discussed the draft Activity Matrix for Determining Potholing Method and soliciting feedback.
- 2025 Potholing Survey that collected feedback on the Potholing Activity Matrix, which contained suggestions for matching a potholing method to a type of project.

## **DISCUSSION**

Potholing is used to visually verify facilities, obstacles, and hazards within an excavation zone. Potholing is also sometimes done adjacent to the excavation zone if the excavator is concerned that there may be nearby parallel facilities (particularly high priority facilities), or the weight of the mechanical equipment might damage adjacent underground facilities.

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<sup>7</sup> Insert link to 2025 workplan and indicate page number for quote.

<sup>8</sup> [August 2022 Potholing Workshop](#)

<sup>9</sup> [August 2023 Staff Report](#)

<sup>10</sup> [August 2023 Potholing Workshop](#)

<sup>11</sup> [September 2024 Staff Report](#)

<sup>12</sup> [April 2025 Staff Report Potholing Activity Matrix](#)

The CGA 2023 *Damage Information Reporting Tool* (DIRT)<sup>13</sup> report found that excavators digging prior to verifying marks by potholing is one of its top six “Damage Root Causes.” It also found that facilities not marked due to locator error in its top six Damage Root Causes.

Further, GGA’s most recent *Next Practices Initiative Report*<sup>14</sup> states:

“CGA’s damage prevention stakeholder survey data, DIRT damage root cause data and excavator research data (reviewed in CGA’s Excavator White Paper) identified excavator errors in the field as another critical issue facing the industry. **More than 30% of surveyed damage prevention stakeholders selected “excavator errors in the field” and “lack of potholing by excavator” as the top damage prevention challenges facing the industry.**”

“...confirms that concepts such as potholing/test-pitting, needing to maintain marks or requesting re-marks do not have the same level of awareness and compliance among excavators as notification. Focus groups with excavators revealed that most training occurs informally on the job site, which means poor adherence to critical safe excavation steps is likely to trickle down to new excavators. Of excavators surveyed for the [2019 Excavator] White Paper, only 42% reported always verifying the accuracy of marks – so 58% are not in compliance with that essential Best Practice. **Taken altogether, the available data indicates that excavators are not always taking all the steps necessary to ensure safe excavations.**”

The CGA *Next Initiative Report* also provided data on excavators’ adherence to safe practices from their 2019 survey of excavators suggesting only 42 percent of excavators are verifying locator marks by potholing:

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<sup>13</sup>See page 4 of the [DIRT 2023 Analysis and Recommendations](#)

<sup>14</sup> [CGA Next Practices Report, February 2021, Page 6](#), Emphasis in the original

## EXCAVATOR ADHERENCE TO SAFE DIGGING PRACTICES

Q: For each of the following processes, please indicate if you or someone at your company does this all of the time, most of the time, some of the time, rarely, or never when conducting excavation/digging work. Data shown is all of the time.

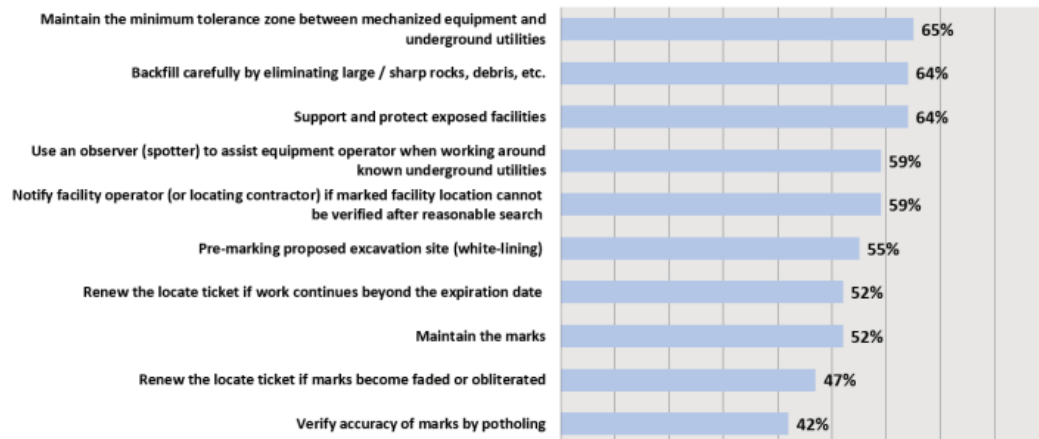


Figure 1: Excerpt from CGA Next Initiatives Report<sup>15</sup>

## Proposed Potholing Practices Standards

The proposed potholing standards are presented in this report in Attachment A. This is the first time since 2023 that all the standards have been presented together. For ease of reference, standards have been renumbered and standards that are new since 2024 have been indicated with a (“new”) in the title. The format for the standards begins with a general subject title, followed by the standard itself and finally a discussion and references. The standards inform excavators that they should visually identify underground facilities within and near an excavation. The standards also address challenges excavators face when maps are inaccurate, locator marks may be incorrect, unmarked facilities are present, and field conditions are different than what is shown in available information about the project.

Proposed standards for potholing presented to the Board in September 2024 addressed:

- Identification of Potholing Locations
- Confirmation of Marks Using Utility Operator Responses and Surface Indicators
- Deeply Buried Facilities – Exceptions to Positive Confirmation Based on Data Quality C Information
- Documenting Utility Operator Marks and the Results of Potholing
- Identification and Protection of Sewer Laterals
- Operator Responds to Excavator Request for Additional Information About the Location of a Subsurface Installation

<sup>15</sup> [CGA Next Practices Report, February 2021, Page 6](#)

The Board encouraged staff to continue developing these standards and to collect public comments. Reviewing public comments received (through Board meetings, workshops, and surveys) revealed additional areas of concern not addressed in statute, regulation, or the CGA *Best Practices*, and that were not previously addressed in draft standards proposed to the Board. Specifically:

- Pothole Depth (August 2022 and August 2023 workshops and September 2024 Board meeting)<sup>16</sup>
- Identifying Change in Direction and Change in Cover (August 2022 and August 2023 workshops and September 2024 Board meeting)<sup>17</sup>

The new proposed standards found in Attachment A address these additional areas of concern.

### **New Proposed Potholing Practices Standards**

Pothole Depth (Standard number 3 in Attachment A).

Through public comment, excavators emphasized the importance of knowing the depth of the facility while also expressing concern that:

- Depth information is not always available from operators,
- There may be facilities present, at varying depths, belonging to other operators,
- When depth is indicated on maps, the maps may not be accurate,
- Other facilities may be located parallel to or stacked vertically, and
- There may be unmarked facilities at varying depths within the excavation zone.

The excavator will know the planned depth of the excavation from the project design. But there may be other facilities present beneath the planned excavation depth. By suggesting that the excavator pothole to the depth of the planned excavation, plus a 12-inch margin, the excavator should be able to visually verify the presence of the facility and other facilities that may be located within the excavation zone.

This approach to establishing a depth standard for potholes addresses the concern excavators expressed regarding map inaccuracy and inability to obtain depth information from operators. This also addresses concerns expressed by operators that if an operator provides depth information, an expectation may be created that the depth information is correct and it is known that depth can change over time.

Furthermore, rather than the previously proposed standard suggesting potholes be made every 50 feet, the revised proposal suggests that potholes be made as frequently as necessary

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<sup>16</sup> Ibid.

<sup>17</sup> Ibid.

to establish visual identification of subsurface facilities. The excavator should examine the excavation zone, identify locations that should be potholed for visual verification, and make potholes wherever necessary to achieve visual verification. This approach relies on the judgment of the excavator as to how many potholes are sufficient to visually verify objects within the excavation zone. It also emphasizes visual verification within the excavation zone to encourage excavators to do as many potholes as needed to identify facilities within the excavation zone. This is important because not all subsurface facilities are straight and might curve, bend, or change elevation. Excavators should determine whether there is a shift in the direction and/or elevation of the facility before they use mechanical equipment.

Lastly, the previously proposed standard (Identifying Potholing Locations) combined potholing locations with frequency and intervals. Staff proposes revising that standard to create a separate standard specific to frequency, intervals, and depth.

#### Identifying Change in Direction (Standard number 1 in Attachment A)

Public comments noted that potholing is used as a means to visually verify whether a facility is linear or changes direction. Changes in direction can occur if the facility was built around an obstacle or if the facility was originally laid with slack and therefore is not following a straight path (direct bury cable or wire, for example). Changes in direction may also be inaccurately indicated on maps and can be the cause of damage to facilities if not identified. Language addressing change in direction was added to the proposed standard for Identification of Potholing Locations.

#### Expected Cover (Standard number 1 in Attachment A)

Public comment noted that when identifying locations for potholes the excavator should consider whether the depth of cover has changed due to loss of ground cover, soil type, or land use. This is particularly common in agricultural areas and in areas where land use has changed. Language addressing expected cover was added to the proposed standard for Identification of Potholing Locations.

#### Actions when Potholing Cannot be Performed (Standard number 5 in Attachment A)

The CGA *Best Practices* address conditions where potholing cannot be performed, facilities are known to be present, and trenchless excavation will be used.<sup>18</sup> It does not address when other forms of trenching will be used, and potholing cannot be performed, such as facilities encased in concrete or well drilling, for example. This new proposed standard addresses actions to be taken when potholing cannot be performed before excavation<sup>19</sup> other than trenchless excavation.

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<sup>19</sup> [CGA Best Practice 5.29 Trenchless Excavation](#)

Documenting Utility Operator Marks, Potholes, and Communicating the Results of Potholing (Standard number 6 in Attachment A)

For this previously proposed standard the title was revised, and the following sentence was added:

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.

This addition addresses the importance of communicating the results of potholing to all personnel involved with the excavation: work crews, contractors, and subcontractors to ensure that all on-site personnel are aware of any safety or other issues that were revealed as a result of potholing.

**Update on Potholing Activity Matrix**

Staff developed a Potholing Activity Matrix to serve as a tool for developing potholing standards and to assist with determining the appropriate method for exposing buried facilities. Staff conducted a survey of stakeholders on potholing methods and the Potholing Activity Matrix. The results of the survey were used to recommend proposed standards for depth, documentation, and communication.

The survey elicited many suggestions and questions regarding the use of the Potholing Activity Matrix, how the legend shown in the Matrix is applied to different activities, and applications that were not included in the Matrix. For example:

- Clarify terms used, for example, “Always,” and “Advanced Exposure Methods,”
- Include a depth below surface requirement, and
- Differentiate potholing requirements for horizontal and vertical boring.

Forty-seven percent of the respondents indicated they would be willing to provide additional comments and suggestions on methods the respondents use to pothole different types of projects.

One key insight from the survey identified an issue related to potholing with mechanical equipment. As noted earlier, Gov. Code section 4216.4 states: “excavators shall determine the exact location of the subsurface installations in conflict with the excavation using hand tools before using any power-driven excavation or boring equipment within the tolerance zone...” and CCR section 4501 also applies when anything other than a hand tool is used to pothole. Sixty-six percent of the respondents, however, indicated they train employees to use mini-excavators, excavators, and/or backhoes to pothole. They also train using shovels, spades, vacuum excavation, air knives, and hydrovac equipment. This indicates they may be unaware

that potholing by mechanical excavation is not generally allowed by statute.

## **CONCLUSIONS**

The proposed potholing standards address issues identified with ensuring visual verification of subsurface facilities prior to mechanical excavation in a real-world environment when excavators cannot rely on maps, field markings, and design drawings and encourage excavators to communicate their findings with operators and other relevant parties.

Matters that cannot be addressed by standards could be addressed through Frequently Asked Questions (FAQs) and educational programs. Possible topics could include:

- Statutory and regulatory restrictions on using mechanical equipment for potholing
- Potholing for homeowners

## **RECOMMENDATIONS**

Staff recommends that the Board direct staff to: 1) publish draft potholing standards for public comment; and 2) develop draft FAQs to address potholing misconceptions revealed in the recent potholing survey.

## Attachment A Proposed Potholing Standards and Descriptions

Revisions to previously proposed standards show changes in underline and ~~strikeout~~ type face. New proposed standards are shown in *italic* type face. Standards have also been renumbered.

### 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 surveys,
- maps from utility operators,
- input from locators and operators' staff.

To determine direct points of conflict, the excavator ~~considers~~ 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 potholing pothole~~ concrete or asphalt in the path of excavation.
- Existing crossings. The excavator identifies and potholes existing buried facility crossings. ~~In an attempt~~ 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 ~~determines~~ 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.
- ~~A minimum distance between potholes for certain parallel facilities. The excavator~~

~~makes regularly spaced potholes at set minimum intervals e.g. every 50' feet over any subsurface installations that are likely to conflict with the excavation, as well as any that parties to pre-construction meetings and/or contractual agreements have identified for such exposure ahead of construction.~~

**Discussion:** When determining ~~potholing~~ 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 ~~for~~ 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. ~~Ultimately, the excavator must always evaluate the most current information available when potholing, including the appearance of new locate marks or surface indicators since the completion of design plans.~~

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

~~Following utility operator locate and mark activities, the excavator reviews the site with response information provided by utility operators. The excavator uses the response 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. ~~Appendix A (Surface Indicators of~~

Buried Infrastructure) contains images and descriptions of common surface indicators.

Additionally, utility operator identification of the number, size, and material of buried facilities is required by law and necessary so that the excavator can identify whether they have found the line identified by the utility operator. Absent this information, the excavator may find an unmarked line, mistake it for the marked line, and subsequently come into unsafe contact with the utility operator's marked line through use of power tools. Related requirements, best practices, and guidelines include:

- Government Code sections 4216 (n) and 4216.3 (a) & (e).
- California Public Utilities Commission General Order 128<sup>20</sup> (Construction of Underground Electric Supply and Communications Systems), Rules 17.8 (Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures) and 35.1 (Identification of Cables)
- CGA *Best Practices*<sup>21</sup> 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)<sup>22</sup>
- American Water Works Association California/Nevada Section *Guidelines for Distribution of Nonpotable Water*<sup>23</sup> (1992) Sections 2.5 (Valve Box and Other Surface Identification) and 4.1 (Marking).

### **3. Pothole Frequency, Intervals, and Depth (New)**

*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<sup>24</sup>.*

*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.*

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<sup>20</sup> [GO 128 - Rules For Construction of Underground Electric Supply and Communication Systems](#)

<sup>21</sup> Common Ground Alliance *Best Practices* [Home](#)

<sup>22</sup> [Guidelines for Operator Facility Field Delineation](#)

<sup>23</sup> [Guidelines for the Distribution of Nonpotable Water.pdf](#)

<sup>24</sup> [5.22 Exposed Facility Protection](#)

#### **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.

#### **5. Actions When Potholing Cannot be Performed (New)**

*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.*

#### **6. Documenting Utility Operator Marks and, 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, ~~in pothole maps or logs, as well as the presence of~~ 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, ~~if there is a~~ when a problem is identified later, and what the source(s) ~~or sources~~ of that problem may have been. ~~Effective documentation of potholing results benefits the excavator(s) or potholing crew(s) specifically by pre-empting doubt as to the effectiveness of the job they performed.~~ Adding a locating device to previously unidentified facilities will assist in locating facilities after potholes are filled.

## **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 likely 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 ~~of~~ 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.

## **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. ~~An operator promptly provides information to the excavator for determining the exact location of a subsurface installation when an excavator has attempted to locate it and subsequently contacts the operator for assistance.~~ 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 ~~they~~ 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 ~~this~~ 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.