
California Underground Facilities Safe Excavation Board

July 14-15, 2025

Agenda Item No. 26 (Information Item) – Staff Report

Unmarked Lines – Scope of Safety Standards Update

PRESENTER

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SUMMARY

There is no standard process for how operators should respond to a notification of an unmarked subsurface installation. The Board's safety standards are not intended to replace other relevant standards, such as Common Ground Alliance's (CGA) Best Practices and instead should inform areas currently without safety standards. CGA's Best Practices already define what excavators and Regional Notification Centers (RNCs) should do when an unmarked subsurface installation is discovered during excavation, but do not give guidance about how operators should respond to notification of an unmarked subsurface installation. Staff recommends that the Board focus the scope of its safety standards for unmarked subsurface installations to specifically address how operators respond to notifications of these installations.

STRATEGIC PLAN

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

Strategic Activity: Develop Processes to Assist Excavators in Identifying Unmarked and Abandoned Lines

BACKGROUND

Government Code Section [4216.18](#) requires the Board “develop a standard or set of standards relevant to safety practices in excavating around subsurface installations and procedures and guidance in encouraging those practices.” These standards are to be “informed by publicly available data” and are not intended to replace “other relevant standards, including the Best Practices of the Common Ground Alliance, but are to inform areas currently without established standards.”¹

The Board's [vision](#) includes effecting a California in which excavators and operators know and understand how to identify the locations of subsurface installations and how to resolve unexpected situations that arise.²

¹ [Gov. Code Section 4216.18](#)

² <https://energysafety.ca.gov/wp-content/uploads/docs/underground/policy-b-03-vision.pdf>

In July 2022, the Board was informed that a primary stakeholder concern is the “lack of standard communication practices between excavators and operators” upon discovery of an unmarked subsurface installation.³

In January 2023,⁴ the Board discussed the importance of distinguishing unmarked subsurface installations from abandoned subsurface installations and noted that much of the problem with “abandoned” lines actually stems from the fact that these subsurface installations were not marked. Much of the Board’s discussion since then has focused on long-term solutions on how to increase information sharing about unmarked or unclaimed subsurface installations.⁵

DISCUSSION

As mentioned, a primary stakeholder concern about unmarked lines is the lack of communication standards between excavators and operators. In order to produce safety standards that provide guidance for communication practices with unmarked subsurface installations, the Board needs to examine existing safety standards, including Best Practices by CGA.

Existing Standards and Best Practices

Statute and CGA Best Practices both indicate that communication should be established between the parties and specify — in some cases — what that communication should look like. Below is an examination of standard communication practices in both CGA Best Practices and in the Dig Safe Act for what all parties should do when an unmarked subsurface installation is encountered in the field.

Standards re: Communication Practices of Excavators

When an excavator finds an unmarked subsurface installation in the field, CGA Best Practices say that excavation ceases and the excavator contacts either the RNC or the operator directly to report the unmarked subsurface installation.⁶ The DigSafe Act requires an excavator to report an operator’s failure to identify their subsurface installations to the RNC.⁷ Excavators should have the contact information for all operators on the ticket.⁸

Standards re: Communication Practices of RNCs

Under CGA Best Practices, when an RNC is notified by an excavator that an unmarked subsurface installation has been found, the RNC should use its “defined and documented policy,” which “could be as simple as re-notifying all affected facility operators.”⁹ Underground Service Alert of Southern California (DigAlert’s) process includes sending an “EXPD” (exposed)

³ [Item 14: Abandoned Lines Standards Development Update](#), Staff Report entitled “*Abandoned Lines Standards Development Update*,” July 11-12, 2022

⁴ [Item 7: Distinctions Between Unmarked and Abandoned Lines](#), Staff Report entitled “*Distinctions Between Unmarked and Abandoned Lines*,” January 9-10, 2023

⁵ See, e.g., [Item 27: Unmarked Lines – Ticket Data](#), Staff Report entitled “*Unmarked Lines – Ticket Data*,” April 14-15, 2025

⁶ [CGA Best Practice 5-21](#)

⁷ [Gov. Code Section 4216.3\(d\)](#)

⁸ [Gov. Code Section 4216.10](#); [CGA Best Practice 5-14](#)

⁹ [CGA Best Practice 3-25](#)

ticket type “when the excavator states there is an unmarked exposed line and requests the members to respond to be identified.”¹⁰ Underground Service Alert of Northern California and Nevada (USA North) has a similar process: when an excavator notifies USA North that the excavator exposed — but did not damage — a subsurface installation, USA North will use an exposed ticket type to alert members who have subsurface installations in the area.¹¹

Standards re: Communication Practices of Operators

Although it is standard practice in California for RNCs to re-notify operators on the original ticket when an unmarked subsurface installation has been reported (consistent with CGA Best Practice 3-25), there is no standard process for how operators should respond to the notification. There are standards in place for how operators should update their records,¹² but not what steps operators should take to identify whether the unmarked subsurface installation is theirs and therefore needs to be added to their records. There is also no guidance or legal requirement that operators respond at all to a notification of an unmarked subsurface installation, let alone how they should communicate with RNCs or excavators¹³.

Appropriate Scope for Safety Standards

Since the primary complaint of stakeholders was the lack of standard communications practices between excavators and operators upon the discovery of an unmarked subsurface installation, this should be the focus of the Board’s work to develop safety standards. As detailed above, CGA and the DigSafe Act both indicate what excavators and RNCs should do; however, there remains no guidance on how operators should respond, or even whether they should respond to a notification about an unmarked subsurface installation discovered during excavation. This echoes a previous stakeholder complaint: the inability to secure cooperation from operators in identifying the operator of an unmarked subsurface installation.¹⁴

Focusing the scope of safety standards on appropriate operator responses would also fulfil the Board’s statutory mandate to develop safety standards in a manner that does not replace other relevant standards, including CGA Best Practices, but instead informs areas “currently without established standards.”¹⁵

RECOMMENDATION

Staff recommends the Board focus the scope of unmarked subsurface installation safety standards on operator responses to notifications about the presence of unmarked subsurface

¹⁰ [DigAlert Ticket Types & Explanations](#)

¹¹ [USA North Excavation Handbook \(2023\)](#), page 8.

¹² [Gov. Code Section 4216.3\(a\)\(4\)](#) requires that operators “amend, update, maintain, and preserve all plans and records for its subsurface installations as that information becomes known.” Similarly, [CGA Best Practice 4-2](#) requires operators to make corrections and updates to their records and [CGA Best Practice 6-8](#) says operators should use the most precise location information obtained to correct discrepancies.

¹³ While [Gov. Code Section 4216.4\(b\)](#) requires operators to respond to an excavator who cannot find a *marked* line, this does not extend to situations where an excavator finds an unmarked line.

¹⁴ [Item 14: Abandoned Lines Standards Development Update](#), Staff Report entitled “*Abandoned Lines Standards Development Update*,” July 11-12, 2022

¹⁵ [Gov. Code Section 4216.18](#)

installations. Staff also recommends the Board further develop the content of safety standards for unmarked subsurface installations by having staff conduct a survey and host a workshop. These efforts will help maximize stakeholder participation and ensure the standards are well-informed.