

California Underground Facilities Safe Excavation Board

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Agenda Item No. 41 Information Item – Staff Report

Planning and Design Update

PRESENTERS

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SUMMARY

This report outlines an implementation plan for [Senate Bill \(SB\) 254](#) (2025), ¹ which requires the Board to adopt regulations for a planning and design information exchange by July 1, 2027.

SB 254 transitions California’s planning and design process from a voluntary coordination effort into a mandatory, regulated framework. Under this law, the Board must define timelines, processes, and data standards governing how project designers, excavators, and utility operators exchange information prior to excavation.

The purpose of this report is to:

- Explain what has changed under SB 254 and its impact on safety, efficiency, and accountability.
- Identify the Board’s new regulatory responsibilities.
- Describe how stakeholder input will shape forthcoming regulations.
- Present a development plan that provides clear opportunities for the public and regulated community to participate in this rulemaking (regulation).

Standardized procedures for planning and design will help reduce excavation damage risks, improve data accuracy, and promote consistent communication among California’s 2,200 utility operators and thousands of excavators and designers.

STRATEGIC PLAN

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

2023 Plan Activity: Develop a Planning and Design Ticket

¹ [SB 254 Energy](#)

BACKGROUND

The Board first introduced the planning and design ticket concept in 2024 as part of its long-term strategy to improve early project coordination². At that time, participation by utility operators in design information exchanges was voluntary, and staff efforts centered on research and development of a standardized planning and design ticket form.

The enactment of SB 254 fundamentally changed this framework. The legislature determined that voluntary participation was insufficient to achieve statewide consistency, data reliability, and safety outcomes. SB 254 now mandates participation by all operators and assigns regulatory authority to the Board to define:

1. Timelines and standard processes for the exchange of information; and
2. Data and format requirements for that information.

DISCUSSION

The following explains how SB 254 reshapes the planning and design information exchange, outlines the Board's new regulatory responsibilities, and describes how both the new statutory requirements and stakeholder feedback will jointly guide the rulemaking process and information exchange system testing.

Planning and Design Process Chart – Public Comment Summary

The staff introduced the planning and design process chart³ at the April Board Meeting which provided the roles and responsibilities of various stakeholders in the planning and design process. During the public comment period for the planning and design process chart, stakeholders, including utility operators, contractors, municipal agencies, and design professionals, provided valuable input that both supported the Board's efforts and highlighted areas for improvement⁴. Overall, commenters expressed strong support for standardization and early coordination, emphasizing that clear, uniform design procedures will help streamline project planning, reduce redundant locate-and-mark activity, and improve efficiency statewide. Stakeholders also stressed the importance of balanced access to information, recognizing that while data security is necessary, overly restrictive verification requirements could hinder timely collaboration.

Feedback from small utilities and rural agencies identified resource challenges, such as limited engineering staff and incomplete as-built records, which affect their ability to participate effectively in the design exchange. Commenters also requested greater clarity in terminology and expectations, including references to American Society of Civil Engineers (ASCE) 38 standards to guide utility data quality and precision. Recurring feedback included the need for digital record delivery, faster response timelines, and improved coordination between operators and jurisdictions, along with a reminder that design tickets must complement, not replace, excavation tickets. Board staff also conducted interviews with engineering design experts who underscored the importance of early access to accurate

² [2024 Annual Workplan](#)

³ [2025 April Board Meeting](#) - Item 30: Planning and Design Standards: Process Chart and Public Comment Period

⁴ [Notice of Public Comment on Draft Planning and Design Process Chart and Board Standards](#)

geographic information system (GIS) and environmental data, and improved coordination for large, multi-utility projects.

Integration of Stakeholder Feedback and Regulatory Direction

Both the new SB 254 regulatory requirements and stakeholder feedback on staff's process chart, will inform the Board as it develops statewide planning and design requirements. Staff has identified four key areas of focus, which can help inform the foundation of the statewide planning and design system. Statute includes these areas that should be considered as:

- **Appropriate Timelines**
 - Establish clear, enforceable timeframes for submitting, reviewing, and responding to planning and design requests.
- **Standard Processes Associated with Information Exchange**
 - Develop consistent statewide procedures for how planning and design tickets are issued, managed, and closed.
- **Data Requirements and Format Standards**
 - Defining the core ticket fields and the digital format of attachments that promote compatibility across RNC platforms and support a future web-based information exchange.
- **Public Engagement**
 - Outline how stakeholders, including RNCs, operators, excavators, and designers, will be able to provide input throughout the regulatory process. This includes formal workshops, public comment periods, surveys, and Board meetings to promote transparency and shared understanding.

These four areas represent the Board's new regulatory responsibilities as they relate to the planning and design information exchange. Each area is essential to achieving the statutory goal of a uniform, transparent, and efficient statewide planning and design information exchange.

Stakeholder input gathered throughout the 2025–2026 engagement cycle has been and will continue to be critical to shaping these desired outcomes. Staff will use this feedback to guide regulatory workshops and information exchange system testing throughout 2026, allowing stakeholders to test the Planning and Design Ticket, evaluate data compatibility, and provide structured feedback. The results of the testing and engagement activities will form the basis for the proposed regulatory package to be presented to the Board for adoption by the July 1 statutory deadline.

Planning and Design Ticket

Purpose

A planning and design ticket is intended to serve as a mechanism for a standardized, statewide information exchange between excavators, designers, and operators, allowing all project stakeholders to share accurate and consistent data during the design phase before excavation begins.

Why It Matters

The Planning and Design Ticket is intended to promote greater coordination, transparency, and accountability across the underground infrastructure community, and also be the place where critical project details, such as location, type of work, and timelines, are communicated more consistently, which may help reduce miscommunication during the design phase. By establishing a uniform digital record of design requests and operator responses, the design ticket is expected to support earlier identification of potential conflicts, improve project planning, and align practices with the new regulatory framework established under SB 254.

Key Regulatory Elements

The Planning and Design Ticket will define several key elements that enable implementation of SB 254:

- Standard ticket data fields for project information and mapping.
- Response timelines and escalation protocols when operators cannot meet statutory deadlines.
- Digital submission and GIS integration requirements for mapping accuracy and compatibility with existing RNC systems.
- Documentation and record retention standards to support long-term accountability, transparency, and data analysis.

Together, these elements will allow the Board to establish a cohesive statewide framework that governs how design-phase information is requested, shared, and maintained.

Testing and Stakeholder Engagement

A draft Planning and Design Ticket will be tested during a series of workshops in 2026 to gather feedback, assess data compatibility, and refine technical requirements prior to formal rulemaking. This testing phase will allow that both operators and excavators can effectively use the ticket within RNC systems.

The Planning and Design Ticket will then serve as the foundation of the regulatory drafting process. Feedback collected during the 2026 testing will be analyzed and incorporated into the proposed regulations, which will then undergo public review and comment. The final version of the ticket will be embedded within the proposed regulatory package presented to the Board for adoption in 2027.

SB 254 - Development Plan

To work towards transparency, coordination, and consistent stakeholder participation, staff has made the following Development Plan that outlines the key activities and milestones that will guide development of the planning and design regulations. This roadmap demonstrates how the Board will meet statutory obligations under SB 254 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
Workshop: Data Requirements and Format Standards	Identify the core ticket fields, such as project scope, mapping files, and contact information and discuss digital formats for sharing.	January 2026	All stakeholders, including operators, excavators, designers, and RNCs
Workshop: Standard Processes and Ticket Procedures	Identify consistent statewide procedures for how planning and design tickets are issued, managed, and closed.	February 2026	
Survey: Timeline for Information Exchange	Establish clear, enforceable timeframes for submitting, reviewing, and responding to planning and design requests.	February 2026	

As this process moves forward, stakeholders are encouraged to stay informed and actively monitor Board communications for workshop announcements, public comment opportunities, and draft releases. Since SB 254 development timeline is short, things will be moving much faster, stakeholders who wish to be involved will need to engage early and consistently, as input gathered in the upcoming months will shape the regulatory direction.

RECOMMENDATION

Staff recommend that the Board provide initial feedback on the proposed approach for developing the planning and design information exchange under SB 254. Specifically, staff seek input on whether the Board agrees with the overall direction, and if there are any key considerations, additions, or modifications the Board would like staff to explore further as the work progresses.