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To whom it may concern,

Please accept these comments regarding the Sand and Gravel Permit process and our attempt to shed light on the impact to construction, roadway maintenance and most importantly, underground damage prevention. This commentary highlights our organization's role, not as a Sand and Gravel location owner, but as a proactive entity striving to minimize damages to underground utilities through strategic interventions. Dig Law Advocates works in collaboration with construction companies, state and local agencies as well as utilities to foster coordinated working relationships within the industry, with a particular emphasis on the significance and effectiveness of vacuum excavation.

Vacuum excavation has long been recognized as a safe method for excavating around underground utilities, thereby significantly reducing the risks related to potential damage, outages, injuries, or fatalities. By employing vacuum excavation techniques, the chances of damaging critical underground infrastructure are substantially minimized, ensuring a safer working environment for construction crews and utility personnel. Vacuum excavation is recognized as a best practice by the Common Ground Alliance and other national organizations focused on utility damage prevention. The efficacy of such preventive measures can be impacted by logistical constraints related to the disposal of excavated material.

One of the key concerns raised by Dig Law Advocates pertains to the implications of limited disposal locations on damage prevention efforts. As the number of Sand and Gravel pits available for material disposal diminishes, there arises a potential bottleneck in the disposal process. This bottleneck can lead to delays in the excavation activities, as vacuum trucks might have to travel longer distances to access alternate disposal sites or wait in queues at the existing facilities. Such delays can hamper the productivity of construction crews, leading to a scenario where expedited work without proper safety measures might be considered, thereby increasing the risk of utility damages.

In recent years, there has been a noticeable surge in the utilization of vacuum trucks for excavation purposes. The prevalence of these trucks on construction sites has increased twofold or even threefold compared to a decade ago. A substantial reason behind this upsurge in truck numbers can be attributed to the heightened emphasis on damage prevention within industry. Large excavation companies have started investing in their own fleet of vacuum trucks to enhance their operational efficiency and safety standards. Despite this trend, a significant proportion of vacuum trucks are still operated by for-hire companies, indicating a reliance on external resources for excavation needs.

The rise in the ownership of vacuum trucks by construction companies underscores the importance attached to damage prevention and safe excavation practices. By limiting the disposal locations for excavated material, there is a probable limitation imposed on the



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operational flexibility of vacuum trucks. This restriction can curtail the amount of time a truck can spend on-site, thereby impacting the efficacy of safe excavation practices around underground utilities. The interplay between disposal site availability and efficient excavation operations necessitates a more balanced approach while evaluating hydro-excavation material and disposal sites like sand and gravel pits.

Apart from operational challenges, the extended travel time for vacuum trucks due to limited disposal sites contributes to an increase in their carbon footprint and environmental impact. These trucks are already required to cover considerable distances to reach disposal locations, and further constraints imposed by your intended actions will surely amplify their environmental footprint. Considering the cumulative effect of increased truck operations on the carbon emissions and overall environmental sustainability is imperative while making decisions related to material disposal sites and excavation practices.

In conclusion, the Sand and Gravel Permit Comment from Dig Law Advocates underscores the intricate relationship between damage prevention, roadway maintenance, operational efficiency, and environmental considerations in the realm of underground utility excavation. By recognizing the challenges posed by limited disposal locations on damage prevention efforts and the environmental implications of extended truck operations, it becomes evident that a comprehensive evaluation of permit decisions is warranted. Balancing the need for efficient excavation practices with environmental sustainability is paramount in ensuring the long-term viability of underground utility protection initiatives.

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