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June 24, 2026

The Honorable Bob Latta
Chairman
Subcommittee on Energy
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Kathy Castor
Ranking Member
Subcommittee on Energy
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Latta and Ranking Member Castor:

The Tree Care Industry Association (TCIA) appreciates the Subcommittee's consideration of H.R. 9335, the Advanced Transmission Technology to Reduce Rates Act. As the Subcommittee considers Section 3 of the legislation, which would direct the Department of Energy (DOE) to establish best practices to reduce the risk of wildfire ignition from the bulk-power system, TCIA respectfully offers two recommendations regarding the vegetation-management provisions of that section. First, TCIA encourages the Committee to ensure that the best practices developed pursuant to section 3(b)(1) address a minimum standard of care for the pre-inspection of hazard trees. Second, because utility vegetation management (UVM) contractors perform most of the vegetation-management work associated with reducing wildfire risk along electric rights-of-way, TCIA recommends that the Committee consider expanding the bill's consultation requirements to include nationally recognized organizations representing arborists, UVM contractors, accredited tree care companies.

TCIA represents approximately 1,400 businesses nationwide that engage in commercial tree care, providing services to residential communities, state and local governments, commercial businesses, and utilities. Our members play a vital role in wildfire prevention by identifying and mitigating hazardous vegetation near utility infrastructure, maintaining rights-of-way, and creating defensible spaces that reduce the likelihood of ignition.

Section 3 appropriately recognizes vegetation management and the removal of forest-hazardous fuels along transmission lines as important tools for reducing wildfire ignition risk from the bulk-power system. TCIA encourages the Committee to ensure that the best practices developed pursuant to section 3(b)(1) address a minimum standard of care for the pre-inspection of hazard trees. Although existing vegetation-management requirements and reliability standards address vegetation clearance and related maintenance activities, they do not establish how hazard trees should be recognized or evaluated in the field. As a result, utilities, contractors, and other stakeholders often operate under differing approaches when assessing vegetation-related wildfire risks. TCIA recommends that any minimum standard of care for the pre-inspection of hazard trees included in the best practices be based on the American National Standards Institute (ANSI) A300 Level 1 Limited Visual Assessment, a

widely accepted methodology designed to identify trees with obvious structural defects or conditions warranting closer inspection. Because the Level 1 assessment is intended for large populations of trees characteristic of utility rights-of-way, it provides a practical and scalable framework for hazard-tree identification while supporting risk-informed vegetation-management decisions. Establishing a common baseline would support risk-informed vegetation-management decisions, promote greater consistency across jurisdictions, provide utilities, contractors, and insurers with a common framework for evaluating hazard-tree risks, and help address the legal uncertainty and insurance challenges that increasingly affect participation in wildfire-mitigation work. Such guidance would complement the bill's voluntary best-practices framework and help ensure that vegetation-management recommendations are practical, effective, and informed by field experience.

TCIA also recommends that the Committee consider including nationally recognized organizations representing arborists, UVM contractors, and accredited tree care companies among the entities consulted in developing the best practices. While the legislation directs consultation with electric utilities, the Electric Reliability Organization, and transmission organizations, UVM professionals possess unique expertise regarding hazard-tree identification, vegetation-management implementation, and practical challenges associated with reducing wildfire risk along electric rights-of-way. Their participation would help ensure that the resulting best practices are informed by those responsible for implementing vegetation-management programs in the field

TCIA appreciates the Subcommittee's leadership in addressing wildfire risk and electric system reliability and welcomes the opportunity to serve as a resource as the legislation advances.

Sincerely,

A handwritten signature in black ink, appearing to read "David White". The signature is fluid and cursive, with a large initial "D" and "W".

David White, CAE
President & CEO, TCIA