



July 17, 2026

The Honorable Cynthia M. Lummis
United States Senate
127A Russell Senate Office Building
Washington, DC 20510

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David White, CAE
Tree Care Industry Association
Manchester, New Hampshire

Dear Senator Lummis,

The Tree Care Industry Association (TCIA) writes in support of a Congressional Review Act (CRA) resolution to disapprove the Environmental Protection Agency's recent waiver of preemption for the California Small Off-Road Engine (SORE) amendments.

TCIA represents 1,400 businesses nationwide that engage in commercial tree care, providing services to residential communities, state and local governments, commercial businesses, and utilities. Collectively, TCIA members employ more than 150,000 people, representing an estimated 75% of all tree care workers in the country. Their work safeguards homeowners, businesses, and communities from hazards that threaten critical infrastructure, such as powerlines and roadways. Our members conduct wildfire prevention work and provide essential services in the wake of hurricanes, winter storms, and tornados.

Commercial chainsaws are indispensable to this work. They are the primary tool our members rely on to remove hazardous and downed trees, clear rights-of-way, and respond safely when storms and fires put communities at risk — often in remote locations, in demanding conditions, and over long working days. Our members also depend on blowers, trimmers, and related gas-powered equipment to complete their work reliably and on schedule. For the sustained, high-intensity cutting that professional tree care requires, commercially viable zero-emission alternatives do not yet exist across the full range of our members' needs.

TCIA recognizes and supports the study and reduction of emissions from small off-road equipment. Our concern is that California's SORE amendments impose an accelerated timeline that the technology is not yet ready to meet. When a mandate forces manufacturers away from gas-powered equipment before dependable, cost-effective zero-emission alternatives are available, the resulting costs fall on the tree care businesses that depend on this equipment — and most acutely on the small businesses that make up the vast majority of our industry and are least able to absorb them. The batteries and chargers required to power a full day of professional tree care work carry ongoing costs that can exceed what our members spend on fuel today. Given more time, manufacturers could develop reliable, professional-grade equipment, achieve production efficiencies, and hold down costs for the tree care industry.

Although the SORE amendments are a California regulation, their effects will not stop at the state line. California accounts for a substantial portion of the national equipment market, and a mandate on its timeline shapes what manufacturers choose to design, build, and support, what dealers keep in inventory, and what equipment is ultimately available to arborists everywhere. As manufacturers reorient their product lines toward California's deadlines, tree care companies in other states may find their options narrowed and their costs raised through no policy of their own. With members in every state, TCIA has a direct stake in ensuring that one state's compliance calendar does not become the default schedule for the entire tree care profession.

Disapproving EPA's waiver would not bring the shift to cleaner equipment to a stop, nor would it keep tree care companies from choosing zero-emission tools wherever those tools are ready to perform. It would give equipment capability, affordability, and charging infrastructure the time they need to mature, so that emissions can be reduced in a way that professional tree care operations can actually sustain.

TCIA strongly supports your forthcoming CRA resolution, and we appreciate your leadership in standing up for the tree care industry, the workers it employs, and the communities they keep safe across the country.

Sincerely,

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

David White, CAE
President & CEO, TCIA