



September 16, 2025

The Honorable Sam Graves
Chair, Committee on Transportation and
Infrastructure
U.S. House of Representatives
Washington, DC 20515

The Honorable Rick Larsen
Ranking Member, Committee on Transportation
and Infrastructure
U.S. House of Representatives
Washington, DC 20515

Dear Chairman Graves and Ranking Member Larsen,

The Distribution Contractors Association (DCA) represents contractors, suppliers and manufacturers who provide distribution construction services including installation, replacement and rehabilitation of natural gas distribution systems as well as gas transmission pipelines in communities across the country.

DCA offers unique perspective on pipeline safety from the industry responsible for building and repairing the vast majority of distribution and transmission pipeline infrastructure across the country. DCA supports the Promoting Innovation in Pipeline Efficiency and Safety Act (PIPES Act) of 2025, and we encourage the committee to approve the legislation before the end of this year.

Damage Prevention and GIS Mapping

Ensuring for a safe worksite is fundamental to pipeline contractors, and damage prevention to underground facilities is front and center in achieving that goal. Safe excavation during construction projects is critical, and DCA supports to bolster several fundamental pillars of underground facility damage prevention to underground facilities during excavation. These pillars include mandatory participation in the one-call process (both one-call notification *and membership*); accurate and timely locating of underground facilities prior to excavation; and “potholing” by excavators so that underground facilities are exposed to determine their exact location.

The PIPES Act of 2020 included language that would require operators of gas distribution pipelines to identify and manage traceable, reliable, and complete records, *including* maps and other drawings. Accurate mapping of underground facilities is essential to accurate and timely locating, and use of geographic information systems (GIS) is the most effective way to identify and document a wide range of data about the underground infrastructure.

GIS can create, manage, visualize, analyze, and map different layers of data by creating maps and scenes related to underground facilities. GIS connects data to a map, integrating location data with a range of limiting information regarding the subsurface facilities in that area, and it allows for layering of data tied to geographic points. Rather than restricting the user to limited features on a static map, GIS mapping allows for viewing customizable combinations of data layers in a single dynamic tool.

DCA believes ensuring the use of readily available GIS mapping technologies would be the most efficient way to identify and document the exact location of underground pipelines (as well as other subsurface infrastructure). This precise mapping system is increasingly utilized to ensure for the accurate locating and marking of underground facilities.

Criminal Penalties for Criminal Protesting

DCA supports First Amendment rights for peaceful activism, including peaceful protests to existing and pending pipeline construction projects, but we also support legislative language that would hold those who engage in criminal activities during protests more accountable.

Past proposals on this issue would have revised existing criminal penalties for damaging or destroying a pipeline facility by specifying that vandalism, tampering or disrupting the operation of a pipeline facility would be punishable by criminal fines and imprisonment. Importantly, leading proposals included pipeline facilities under construction within their scope. While interfering or tampering with the operation of a pipeline would clearly compromise pipeline safety, vandalism and destruction of nearby equipment used to build a pipeline can be just as dangerous.

For example, setting construction equipment on fire near a natural gas pipeline can be as dangerous as turning a valve. Several states have enacted laws intended to deter pipeline vandalism. Tampering with or vandalizing critical infrastructure or nearby equipment used to build it can create serious safety risks to the public, pipeline employees and even the perpetrators. Additionally, acts of vandalism could result in devastating environmental impacts. Therefore, we encourage the committee to adopt language that would enact criminal penalties for criminal protesting activities, and these penalties would be subject to vandalism and destruction of equipment and materials needed for construction of pipeline infrastructure.

DCA appreciates your consideration, and we support passage of the Promoting Innovation in Pipeline Efficiency and Safety Act (PIPES Act) of 2025.

Best Regards,

A handwritten signature in black ink, appearing to read 'Rob Darden', with a stylized, flowing script.

Rob Darden
Executive Vice President