



June 23, 2025

Assemblymember Rhodesia Ransom  
Chair, Emergency Management Committee  
1021 O Street, Suite 6340  
Sacramento, CA 95814

**Re: SB 616 (Rubio, Cortese, Stern) – SUPPORT – Wildfire Community Hardening Commission**

Dear Assemblymember Ransom:

I write on behalf of Consumer Watchdog to strongly support your SB 616 to create a Wildfire Community Hardening Commission. The Commission will identify best practices to protect homes and communities from wildfires and collect data about the impacts of wildfire resilience efforts statewide.

A major concern in the wake of the recent Los Angeles fires is how to build back better and make our neighborhoods safe in the long term. Neighborhoods across the state seeking to protect against potential future wildfires face the same dilemma: What guidance to follow? Unfortunately, there is no single place Californians can go to get consistent direction on rebuilding, retrofitting, or community defensible space best practices for wildfires.

SB 616 will close this gap, creating a Community Hardening Commission that homeowners, builders, community organizations, business owners, emergency planners, and city, county and state officials can rely on.

We know mitigation works. Research showing the efficacy of mitigation in protecting homes and communities from wildfire damage is available from every conceivable source, from environmental organizations to the insurance industry, insurance regulators to fire professionals, the building industry to academic researchers.

- An NAIC/Center for Insurance Policy Research study that found “structural modifications can reduce wildfire risk up to 40%, and structural and vegetation modifications combined can reduce wildfire risk up to 75%.”<sup>1</sup>

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<sup>1</sup> Center for Insurance Policy Research, NAIC, et al., *Application of Wildfire Mitigation to Insured Property Exposure*, Nov. 15, 2020, at [https://content.naic.org/sites/default/files/cipr\\_report\\_wildfire\\_mitigation.pdf](https://content.naic.org/sites/default/files/cipr_report_wildfire_mitigation.pdf).

- Fifty-eight percent of the new homes in Paradise, built to meet California’s 2008 fire-resistant building codes, survived the Camp Fire, while just nine percent of older homes did.<sup>2</sup>
- A 2019 CalFire analysis of the relationship between defensible space compliance (as assessed through its defensible space inspection program) and destruction of structures during the seven largest fires that occurred in California in 2017 and 2018 concluded that the risk of a structure being destroyed by wildfire was five times lower for homes with compliant defensible space.<sup>3</sup>
- The National Institute of Building Sciences recently found that adopting the 2015 edition of the International Code Council’s International Wildland Urban Interface Code (IWUIC) in 10,000 census blocks across the country would generate \$4 in wildfire mitigation savings for every \$1 invested and retrofitting 2.5 million homes to the 2018 IWUIC could provide a nationwide benefit-cost ratio as high as \$8 to \$1. These are “benefits that represent avoided casualties, property damage, business interruptions, and insurance costs and are enjoyed by all building stakeholders including developers, title-holders, lenders, tenants and communities.”<sup>4</sup>
- Voluntary “Firewise” programs in California and throughout the United States have developed community-based programs that have substantially reduced wildfire risk.<sup>5</sup>
- A Nature Conservancy report on landscape management, including prescribed burns and forest thinning, can reduce insurance losses by 40-60%.<sup>6</sup>

The science already exists and is widely accepted but has never been gathered in one place to produce community standards for all Californians. The Community Hardening Commission will be that resource so communities can build future resilience or focus on local recovery instead of scrambling to draw together disparate resources when disaster strikes.

California’s “Safer from Wildfires” regulation gives individual homeowners guidelines on how to reduce their wildfire risk and potentially save money on their insurance. Community hardening has the potential to protect Californians even faster than the long process of retrofitting the existing stock of homes, condos, and apartment buildings. The Community

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<sup>2</sup> Jeffrey Mize, “Grim Lessons Learned and Warnings from California Fire Stories,” Government Technology, Sept. 18, 2019, at <https://www.govtech.com/em/preparedness/grim-lessons-learned-and-warnings-from-california-fire-stories-.html>

<sup>3</sup> Legislative Analyst Office, *Reducing the Destructiveness of Wildfires: Promoting Defensible Space in California*, Sept. 2021, at <https://lao.ca.gov/Publications/Report/4457>.

<sup>4</sup> Ruben Grijalva, “How Better Building Codes Can Mitigate Wildfires’ Devastation,” *Governing*, Oct. 22, 2020, at

<https://www.governing.com/community/how-better-building-codes-can-mitigate-wildfiresdevastation.html>.

<sup>5</sup> See <https://www.nfpa.org/Public-Education/Fire-causes-and-risks/Wildfire/Firewise-USA>.

<sup>6</sup> <https://www.nature.org/content/dam/tnc/nature/en/documents/FINALwildfireresilienceinsurance6.27.21.pdf>

Hardening Commission would build on Safer from Wildfires and the work of the Wildfire Mitigation Financial Assistance Program.

Despite all the evidence, insurance companies have resisted crediting homeowners for the mitigation steps they take. Insurers nominally offer premium discounts to homeowners who meet “Safer from Wildfires” guidelines, but the discounts offered are typically dwarfed by the size of premium increases. The insurance industry has said they want community standards to give real consideration to mitigation in pricing. SB 616 gives insurance companies what they want.

SB 616 would also launch the first wildfire data sharing clearinghouse to collect and analyze the impacts of wildfire mitigation efforts on a statewide basis. Information about individual, neighborhood and community mitigation can be siloed at private insurance companies, kept secret by private wildfire catastrophe modelers, or collected differently by fire districts from jurisdiction to jurisdiction. A lack of data sharing and compatibility prevents us from acting on what we already know and stands in the way of long-term resilience. A data sharing platform is long overdue. To augment existing data the bill would also require the Commission to undertake “after-action” reports to collect information and analyze the effectiveness of community hardening efforts after a catastrophic event.

We would urge the authors to make participation by companies in the data clearinghouse mandatory, with appropriate policyholder privacy protections. And we would urge you to recognize that public interest organizations, including environmental and consumer groups, are critical stakeholders the Commission should consult when developing its guidelines.

These changes would strengthen SB 616 as a critical tool to achieve greater wildfire resilience and greater access to insurance in California. We thank the authors for your leadership in bringing the Commission bill forward and are pleased to share our support.

Sincerely,

*Carmen Balber*

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