

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION****OFFICE OF THE STATE FIRE MARSHAL**

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California Earthquake Authority
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California Earthquake Authority,

CAL FIRE was directed to provide information and recommendations to the California Earthquake Authority on measures to enable actuarial credit for verified wildfire mitigations, establish a Mitigation Verification Registry (MVR), enforce neighborhood coverage thresholds ($\geq 80\%$ hardened parcels), and integrate mitigation data into rate filings and catastrophe modeling frameworks.

SB 254 and EO N-34-25 require actionable strategies to reduce wildfire risk, improve community resilience, and integrate mitigation verification into insurance and financial systems. CAL FIRE's recommendations focus on operationalizing these directives through enforceable standards, financing mechanisms, and data-driven accountability. In alignment with Senate Bill 254 and Executive Order N-34-25, CAL FIRE is providing the following comprehensive recommendations to advance natural catastrophe resiliency. These recommendations draw upon technical analysis and framing questions addressing wildfire risk reduction, mitigation strategies, and policy improvements.

Recommendation #1: Implement Mitigations that Matter

- Home hardening: Class A roofs, ember-resistant vents, noncombustible siding and decks.
- Immediate Zone (0–5 ft): Remove combustible materials, install gravel or hardscape.
- Defensible space: Maintain 5–30 ft lean, clean, green zone; 30–100 ft reduced fuel zone.
- Landscape-level treatments: Fuel breaks, shaded fuel reduction, prescribed fire aligned to topography and wind corridors.
- Planning & enforcement: CBC CWUI Code (Part 7), Fire Safe Minimum Regulations, local ordinances.
- Rapid detection & response: Cameras, aviation, staffing.
- Correct myths: Defensible space \neq moonscape; prescribed fire risk manageable with planning.

Recommendation #2: Modernize Risk Analysis Framework

- Shift metric: Structure ignition probability \times consequences, not acres burned.
- Neighborhood coverage thresholds: $\geq 80\%$ hardened parcels to unlock co-investment.
- Tie land-use decisions to ignition and evacuation performance.
- Integrate post-fire flood/debris flow risk into WUI planning.

- Standardize MVR data model: photographic/IoT evidence, inspector attestations.
- Outcome metrics: Expected Annual Loss (EAL) reduction, tail risk, counterfactual analytics.

Recommendation #3: Address Socioeconomic Barriers & Financing

- Direct-install programs for vents, roofs, gutter guards.
- Maintenance funding and recurring compliance checks.
- Financing tools: revolving loans, municipal bonds, resilience bonds tied to milestones.
- Regional Mitigation Delivery Hubs to bundle services and financing.
- Equity criteria: income, age, disability, rental tenure.
- Pay-for-performance vendor contracts linked to verified mitigation outcomes.

Recommendation #4: Align Utility & Community Investments

- Shared risk layers: utility ignition probability + FHSZ + evacuation maps.
- Consequence-weighted ignition scoring for prioritization.
- Joint sequencing of utility hardening and community fuel breaks.
- Grant scoring bonuses for projects complementing utility WMP work.
- Joint funding pilots and regulatory integration across CPUC/CAL FIRE.

Recommendation #5: Develop Integrated Statewide Risk Model

- Components: ignition probability, fuels/threat mapping, climate/weather, vulnerability/egress.
- Governance: Risk Modeling Advisory Workgroup.
- Open API access with privacy controls for insurers and researchers.
- Filing requirements and annual validation protocols.

Recommendation #6: Certify & Incentivize Home Hardening

- CAL FIRE Mitigation Certificate tied to retrofit standards.
- Digital verification registry accessible to insurers.
- Renewal cadence: 3–5 years for actuarial confidence.
- Inspector certification and consumer portal for homeowners.
- Integration with insurance filings for premium credits and real estate disclosures.

Recommendation #7: Implementation Roadmap

- Launch pilots in 3–5 very high FHSZs targeting ≥80% parcel coverage in 12 months.
- Stand up MVR: define data model, privacy, inspector certification, insurer access.
- Issue CAL FIRE/SFM technical bulletins on Zone Zero standards.
- Create joint actuarial task force with CDI and insurers.
- Bundle financing: municipal bonds + revolving loans + grants + utility on-bill options.
- Track outcomes: EAL reduction, ignitions prevented, evacuation performance, post-fire flood impacts.

Recommendation #8: Code Consolidation

- Sections 4201 & 4202 – Wildfire Mitigation Area Designation
- Purpose: Classify lands by wildfire hazard severity to guide mitigation measures.
- State Fire Marshal must designate wildfire mitigation areas by regulation, based on fuel loading, slope, fire weather, and other factors (including wind corridors).
- Maps of wildfire mitigation areas must be published online, showing changes from previous hazard zones.

- Formalizes defensible space and ember-resistant zone requirements statewide.
- Creates a pathway for integrated wildfire mitigation area mapping and regulatory adoption.
- Enhances coordination between local ordinances and state standards for consistency and enforcement.
- Move authority to propagate regulations around defensible space and the minimum fire safe regulations to the Office of the State Fire Marshal.

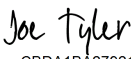
Additional Comments:

CAL FIRE emphasizes multi-agency coordination, expedited fuels reduction, and integration of wildfire risk mitigations to achieve durable resilience outcomes.

Footnotes

1. Public Resources Code §4291: 100-ft defensible space requirement.
2. California Building Code, CWUI Code (Part 7): ignition-resistant construction standards.
3. State Fire Marshal Fire Hazard Severity Zone mapping.
4. AB 38 – California Wildfire Mitigation Program (CWMP).
5. Cal OES Hazard Mitigation Grant Program (HMGP).
6. Risk Modeling Advisory Workgroup.
7. NFPA Home Ignition Zone (HIZ) best practices.
8. Bonbright, Principles of Public Utility Rates (1961).
9. Actuarial Standards of Practice (ASOP).
10. NASA Aviation Safety Reporting System (ASRS).

Respectfully,

DocuSigned by:

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Joe Tyler
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