

Shared Risk, Shared Resilience

Cross-jurisdictional governance
for wildfire mitigation



Acknowledgments

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Executive Summary

Last January's fires across the Greater Los Angeles Area were another sober reminder of California's high fire risk and the need to proactively and collaboratively advance wildfire mitigation at all scales. The San Francisco Bay Area is equally vulnerable. Currently, California's wildfire mitigation responsibilities are spread across multiple government agencies at the federal, state, and local levels. The absence of strong coordinating bodies, especially at the local scale, can lead to fragmented management of forests and grasslands, weak code enforcement, and a lack of community buy-in, hindering effective mitigation of shared fire risks. SPUR's research shows that subregional coordinating entities — such as those proposed after the LA fires and those implemented in Marin County and the East Bay — provide coordination that significantly increases community-scale resilience and, therefore, regional resilience. Replicating models like these in other parts of the Bay Area can help prevent fires in high-risk areas, support insurance availability and affordability, and reduce wildfire recovery costs.

Wildfire Governance Landscape

Wildfire mitigation in California is governed by federal, state, and local agencies with often overlapping jurisdictions. Federal responsibility areas are managed by agencies such as the U.S. Forest Service and Bureau of Land Management, state responsibility areas are overseen by CAL FIRE, and local responsibility areas are managed by city and county governments, usually local fire departments or fire districts. Beyond wildfire response and suppression, CAL FIRE is tasked with developing and implementing the state's Fire Hazard Severity Zone maps and enforcing requirements for property owners in state responsibility areas, in addition to myriad vegetation management and fire prevention programs. In the Bay Area's local responsibility areas, the governance network also includes regional agencies, resource conservation districts, utilities, private landowners, homeowners, and nonprofits, all working to implement or comply with state regulations while shaping local wildfire prevention and mitigation efforts.

Wildfire Policy Landscape

California has some of the country's strictest wildfire mitigation policies, including fire-resilient building codes, defensible space regulations, and Fire Hazard Severity Zone maps. State and local entities are working together to accurately map wildfire risk, allocate resources to those areas, and align wildfire mitigation policies while stabilizing the insurance market. As the regulatory and policy framework evolves from reactive (fighting and suppressing fires, paying claims, mapping

historical risk) to proactive (allowing insurers to assess future risk, investing in home hardening and defensible space, expanding hazard maps), some Bay Area jurisdictions and subregions, two of which we highlight in this brief, are already moving toward a coordinated resilience approach. More Bay Area jurisdictions need to align their mitigation efforts for maximum community benefit, and the state must offer reforms that support a stable and affordable insurance market.

Collaborative Governance Models for Wildfire Mitigation

Wildfire knows no jurisdictional, political, or regional boundaries, making co-management of risk imperative for wildfire prevention and mitigation. The Bay Area offers two models for subregional coordination. The **Marin Wildfire Prevention Authority** is a joint powers authority (JPA) formed in 2020 after voter approval of Measure C, which established a countywide parcel tax to fund coordinated wildfire prevention, mitigation, and preparedness efforts across Marin's cities and unincorporated areas. The **East Bay Wildfire Coalition of Governments** was formed in April 2024, when six cities and two counties signed a non-binding memorandum of understanding to collaboratively address their shared wildfire risks. These governance models showcase two distinct forms of cross-jurisdictional collaboration. The Marin JPA represents a formal, highly coordinated, and sustainably funded model. The East Bay Coalition represents a semi-formal, unfunded model with a lower barrier to entry for improved communication and planning.

Recommendations

RECOMMENDATION 1

Bay Area jurisdictions with shared wildfire risk should establish cross-jurisdiction collaborative governance structures to effectively advance community-scale mitigation initiatives.

RECOMMENDATION 2

Bay Area jurisdictions should establish financing mechanisms that ensure continuity of actions and sharing of resources across jurisdictional boundaries — including nontraditional models that incorporate public and private partners.

RECOMMENDATION 3

With or without cross-jurisdictional subregional governance entities, all counties and cities facing high fire risk should adopt more progressive wildfire-resilience policies, such as defensible space and Zone Zero standards and fire-resistant new construction and retrofit programs.

RECOMMENDATION 4

The California Department of Insurance should establish clear accountability mechanisms and corresponding data tools that require insurance companies to recognize and participate in community-scale mitigation initiatives.

Glossary

Wildfire resilience: The ability of ecosystems, communities, and infrastructure to withstand, adapt to, and recover from wildfires while minimizing damage and loss. Resilience requires both prevention — through vegetation management (see below), land use planning, and building design — and recovery measures that support ecosystem regeneration and community rebuilding.

Wildland-urban interface (WUI): The area where homes and other structures meet or intermingle with undeveloped wildlands such as forests and grasslands. In the Bay Area, 20% to 35% of residents in Contra Costa, Alameda, Solano, Sonoma, and San Mateo counties are living in the WUI. Marin and Napa counties have the highest percentage of residents in the WUI at 45% and 46%, respectively.^a People and property in the WUI face increased wildfire risk and reduced insurability.

Wildfire mitigation measures: Proactive actions, strategies, and policies aimed at reducing the likelihood, intensity, and impacts of wildfires on people, property, and ecosystems. The goal of mitigation is not only to prevent fires but also to minimize damage and enhance the capacity of communities and natural systems to recover when fires do occur.

- **California's WUI/wildfire code:** The state's comprehensive wildfire code (Title 24, Part 7) was updated in 2025 to bring together regulations on building materials (previously Chapter 7A), defensible space (see below) and fire-smart vegetation, fire hazard severity zones, and other related rules that used to be located across the building, fire, public resources, and health and safety codes. The building code portion of the WUI code sets minimum standards for the use of ember-resistant building materials and requires buildings constructed after 2008 in fire hazard severity zones to meet these standards. According to the National Institute of Building Sciences, every \$1 invested in fire-resistant building code compliance can yield up to \$8 in wildfire mitigation savings.^b

- **Fire Hazard Severity Zone (FHSZ) maps:** These CAL FIRE-produced and locally adopted maps classify wildfire hazard severity (for example, moderate, high, and very high) in local responsibility areas in California. They are intended to inform land use planning, building code requirements, defensible space and vegetation management, public safety measures, and local wildfire mitigation strategies.

- **Home hardening:** Using non-combustible building materials and upgrading or retrofitting vulnerable components such as roofs, vents, windows, and siding to protect against embers, radiant heat, and flames can make homes more resistant to wildfires.^c Given California's relatively old building stock, it could take decades to harden enough homes and critical infrastructure, such as hospitals and schools, to realize community-scale benefits.^d

- **Defensible space:** The buffer zone (characterized as 0 feet to 100 feet) between a structure and its surroundings that is maintained to slow or stop the spread of wildfire and provide safe access for firefighters.^e Maintaining defensible space requires cutting back vegetation and removing other combustible materials to reduce flammability. **Zone Zero**, also known as the ember-resistant zone, refers to the area extending 0 feet to 5 feet outward from a building's walls, decks, and attached structures. Embers — tiny burning fragments carried by wind — are responsible for igniting many homes during wildfires. A recent study by University of California, Berkeley posits that home hardening and Zone Zero maintenance can reduce the destructiveness of wildfires by as much as 50% and that the latter alone can reduce structure losses by 17%.^f

- **Vegetation and fuel management:** The process of removing trees, shrubs, grasses and other vegetation to prevent fire risk. Techniques such as prescribed burns, goat grazing, mechanical thinning, pruning, and fuel breaks can reduce fuel loads and fire intensity.

^a Slade Laszewski et al., "Yearly Population Data at Census Tract Level Revealed That More People Are Now Living in Highly Fire-Prone Zones in California, USA," *Environmental Research Communications* 6, no. 3 (2024): 031004, <https://doi.org/10.1088/2515-7620/ad2a93>.

^b Patrick Baylis and Judson Boomhower, "Mandated vs. Voluntary Adaptation to Natural Disasters: The Case of U.S. Wildfires," NBER Working Paper No. 29621, December 2021, https://www.nber.org/system/files/working_papers/w29621/w29621.pdf.

^c CAL FIRE, "Home Hardening," <https://www.fire.ca.gov/home-hardening>.

^d Colleen Corrigan, "Bay Area Cities Amend Their Building Codes to Advance Sustainability and Resilience," *SPUR News*, October 14, 2025, <https://www.spur.org/news/2025-10-14/bay-area-cities-amend-their-building-codes-advance-sustainability-and-resilience>.

^e CAL FIRE, "Defensible Space," California Department of Forestry and Fire Protection, <https://www.fire.ca.gov/dspace/>.

^f Maryam Zamani-alaei et al., "Fire Risk to Structures in California's Wildland-Urban Interface," *Nature Communications* 16, no. 1 (2025), <https://www.nature.com/articles/s41467-025-63386-2>.

Introduction

The Los Angeles fires in January 2025 showed just how vulnerable California's urban areas are to massive loss and damage from fire. Advancing wildfire mitigation programs at all scales will be critical to safeguarding the future of Bay Area cities. Without strong coordinating bodies, efforts to mitigate shared fire risks are far less effective. SPUR's research shows that establishing collaborative governance models across neighboring jurisdictions that face shared risk could significantly increase resilience at both the community and regional scales. The Marin County Wildfire Protection Authority and the East Bay Wildfire Coalition of Governments demonstrate how formal and semi-formal governance models can enhance coordination and the effectiveness of wildfire prevention activities. At the same time, the state, through CAL FIRE and the Department of Insurance, has a vital role to play in implementing wildfire mitigation regulations and guidance. The state also can make certain that the insurance industry recognizes and rewards the reduced risk achieved through community-scale efforts, helping make wildfire-prone areas more insurable and resilient.

The two largest fires in Los Angeles, the Palisades and Eaton fires, burned more than 37,000 acres, destroyed nearly 16,000 structures (including 11,000 homes), and displaced 100,000 individuals.¹ Total property and capital losses ranged from \$76 billion to \$131 billion, and insured losses were estimated at more than \$45 billion, representing an enormous economic impact on Los Angeles County and its communities.² However, the impacts — including poor air quality, strain on the state budget, tightened insurance markets, rising premiums, and increased construction costs — were felt far beyond the Greater Los Angeles Area.

The complex, fragmented web of governance in Los Angeles County, which includes 88 cities and more than 120 unincorporated communities, creates immense difficulty in addressing regional issues such as wildfires. Presently, the county's wildfire activities are overseen by the City of Los Angeles Fire Department and the County of LA Fire Department, also known as the Consolidated Fire Protection District, a special district made up of 30 fire departments serving unincorporated areas and 60 incorporated cities. No single entity coordinates a countywide wildfire mitigation effort in Los Angeles. The result is a patchwork of building codes, local hazard risk maps, funding streams, firefighting and prevention resources, and emergency response plans.

In June 2025, the Blue Ribbon Commission on Climate Action and Fire Safe Recovery, an independent group of experts formed by Los Angeles County Supervisor Lindsey Horvath, in partnership with University of California, Los Angeles, released a report with recommendations for the

¹ Matt Horton, Shannon M. Sedgwick, Justin Adams, Dan Wei, and Matthew Skyberg, *Impact of 2025 Los Angeles Wildfires and Comparative Study* (Institute for Applied Economics, 2025), https://laedc.org/wp-content/uploads/2025/02/LAEDC_2025-LA-Wildfires-Study_090525-UPDATE.pdf.

² Zhiyun Li and William Yu, "Economic Impact of the Los Angeles Wildfires," UCLA Anderson School of Management, March 3, 2025, <https://www.anderson.ucla.edu/about/centers/ucla-anderson-forecast/economic-impact-los-angeles-wildfires>.

rebuilding and long-term resilience of Los Angeles in the wake of the January 2025 fires. One of the commission's key recommendations focused on ensuring resilience to future fires across the region by establishing an LA County wildfire protection district — “a singular agency [to] promote coordination...[and] to ensure the broad public benefits of mitigating the County's widespread fire risk.”³ As part of this recommendation, the commission suggests that the district be

- A standalone special district or a joint powers authority (JPA) that integrates city, county, tribal, and special district jurisdictions, allowing for shared governance.
- Focused solely on fire mitigation and resilience, complementing traditional fire departments and districts that focus on emergency response.
- Responsible for coordinating cross-jurisdictional activities such as devising a regional fire mitigation strategy, conducting public outreach, and implementing vegetation management, defensible space, and home hardening programs.
- Provided taxing authority or access to other sustainable funding to ensure mitigation actions are maintained over the long term and to ensure equitable service delivery.

In light of the commission's recommendation for Los Angeles, SPUR examined management and funding of regional wildfire mitigation activities in the Bay Area and explored opportunities to improve *coordinated* fire mitigation programs at the subregional scale. SPUR found that, although many entities engage in wildfire management and response across the Bay Area, most operate through informal or fragmented coordination across areas of shared risk.

SPUR identified two entities responsible for implementing collaborative fire mitigation planning and projects in their subregions: the Marin Wildfire Prevention Authority, which is a JPA, and the East Bay Wildfire Coalition of Governments, a coalition governed by a memorandum of understanding. These two entities most closely resemble the recommended countywide fire protection district proposed for Los Angeles in that they allow participating governments to build the shared accountability necessary for long-term wildfire resilience. Increasing wildfire risks and the state's forthcoming Zone Zero defensible space requirements will demand a new level of coordination across cities, counties, agencies, nonprofits, and the public. Replicating these collaborative governance models in other parts of the Bay Area would advance that goal.

³ Blue Ribbon Commission on Climate Action and Fire-Safe Recovery, *Final Commission Recommendations and Action Plans for the Resilient and Sustainable Rebuilding of Los Angeles and UCLA Research Context and Considerations Informing Resilient Rebuilding from the January 2025 Los Angeles Fires*, LABR Commission, June 18, 2025, https://labrcommission.org/wp-content/uploads/2025/06/BRC_FinalReport_Digital_FullResolution_061825.pdf.

California’s Governance Landscape for Wildfire Mitigation

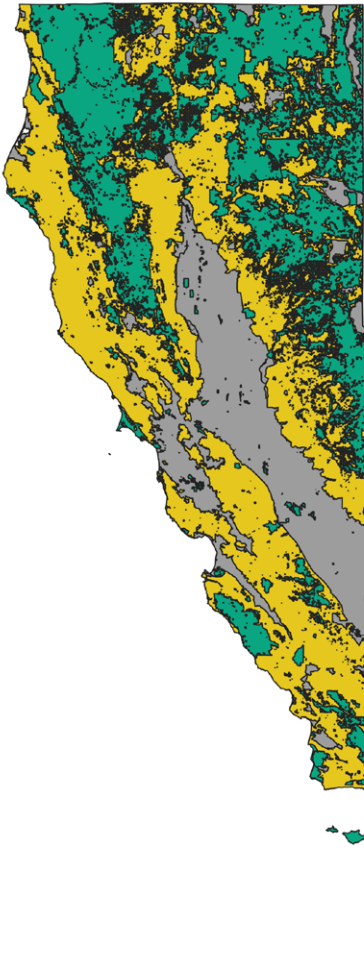
Wildfire prevention, mitigation, and response in California encompasses federal responsibility areas, state responsibility areas managed by CAL FIRE, and local responsibility areas managed by local governments (Exhibit 1).




EXHIBIT 1
Wildfire Management Responsibility Areas
California’s roughly 100 million acres are divided into three areas of wildfire prevention and response financial responsibility.

Sources: SPUR mapping of CAL FIRE state responsibility areas data from the state’s open data portal. (a) Emily Smith and Scott Witt, *State Responsibility Area (SRA) 2025 Five-Year Review* (California Department of Forestry and Fire Protection, 2025), https://calfire-umb05.azurewebsites.net/media/qg1fzklk/full-10-c-bof-2025-sra-5-year-review-20250117_adamfk.pdf; (b) Legislative Analyst’s Office, *Frequently Asked Questions About Wildfires in California*, California

Legislative Analyst’s Office, January 28, 2025, https://lao.ca.gov/Publications/Report/4952#What_are_some_recent_augmentations_the_state_has_provided_for_wildfire_resilience_and_prevention.3F; (c) California Department of Forestry and Fire Protection (CAL FIRE), “Cooperative Efforts,” <https://www.fire.ca.gov/what-we-do/fire-protection/cooperative-efforts/>.

Note: See Appendix A for more information.



	PERCENT OF TOTAL LAND AREA RESPONSIBILITY ^a	MAIN MANAGEMENT AGENCY
 Federal responsibility areas	50%	U.S. Forest Service ^b
 State responsibility areas	33%	CAL FIRE ^c
 Local responsibility areas	20%	Local government agencies (city or county fire departments, fire districts, parks and open space)

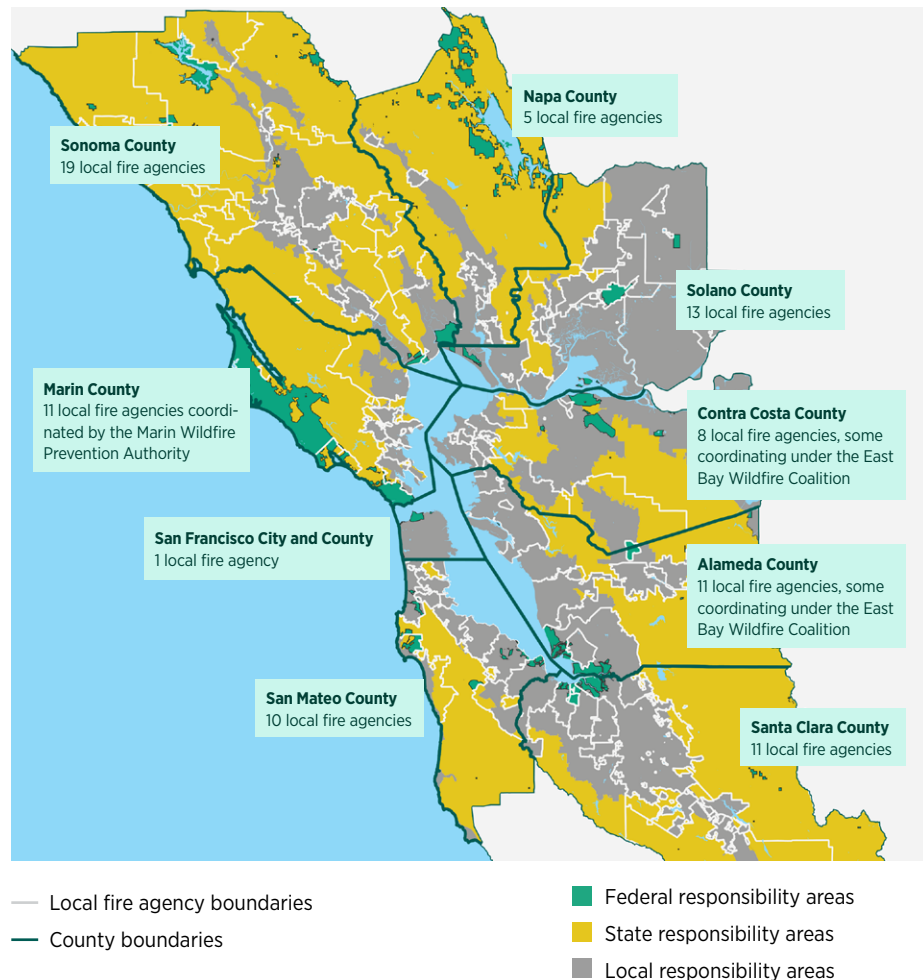
In the Bay Area, federal, state, and regional agencies, along with local fire departments and districts, nonprofit organizations, and utilities, shape California's wildfire prevention efforts. Many of these agencies have historically focused on emergency response after a fire, sometimes underemphasizing critical mitigation and prevention needs until a fire takes place (Exhibit 2).

EXHIBIT 2 Bay Area Wildfire Management Responsibility Areas and Local Fire Agencies

The Bay Area's wildfire risk and management responsibilities are shared among government agencies. Within local responsibility areas, there are 83 fire districts and departments operating across the region. Some subregions have strong collaborations across neighboring fire agencies to implement mitigation actions; others could benefit from more formal shared governance models.

Source: SPUR's mapping of CAL FIRE state responsibility areas data from the state's open data portal and analysis of CAL FIRE maps: "California_Local_Fire_Districts (FeatureServer)," ArcGIS Map, August 2025, https://services1.arcgis.com/IUJYIo9tSA7EHvfZ/arcgis/rest/services/California_Local_Fire_Districts/FeatureServer.

Note: See Appendix B for more information.



Federal Responsibility Areas (Managed by Federal Agencies)

Federal responsibility areas (FRAs) cover 50% of California's total land area and are managed by a handful of federal agencies, including the U.S. Forest Service, the Bureau of Land Management, and the National Park Service. In the Bay Area, FRAs include areas like the Presidio of San Francisco, Muir Woods National Monument, and the Point Reyes National Seashore — all of which are operated by the National Parks Service. Although there are a handful of smaller FRAs managed by other federal agencies within the nine-county Bay Area, the park service tends to be the main federal player in the region.

The Federal Emergency Management Agency (FEMA) is another federal agency that supports wildfire mitigation efforts; however, it does not directly manage forests or grasslands in FRAs. Instead, FEMA acts as a supporting agency that administers the Hazard Mitigation Assistance

program and the recently cancelled Building Resilient Infrastructure Communities (BRIC) program. Through these grant programs, FEMA has provided millions in funding to help California implement firebreaks and habitat restoration in wildfire-prone areas, as well as prepare for other climate and natural hazards. In response to the cancellation of BRIC, California legislators submitted a joint resolution in June calling on Congress and the president to revive federal funding for the program.

State Responsibility Areas (Managed by CAL FIRE)

State responsibility areas (SRAs) are lands where the State of California holds the primary financial and operational responsibility for preventing and suppressing wildfires. These areas generally include forests and rangelands that are not part of incorporated cities or federal lands.

The California Department of Forestry and Fire Protection (CAL FIRE) is the primary state agency responsible for fire protection and response in SRAs, which encompass a third of California's land — more than 30 million acres of privately owned wildlands and state-owned lands.⁴ For most SRAs, CAL FIRE provides full-service protection through 100-plus cooperative fire protection agreements in 31 of the state's 58 counties, 38 cities, 23 fire districts, and 40 other special districts and service areas.⁵ However, in some counties, such as Marin and Los Angeles, the agency primarily funds local fire response, wildfire suppression, and prevention activities. In addition, CAL FIRE is tasked with fire-hazard risk mapping, vegetation management, building code enforcement, and other fire-prevention projects, including defensible space inspections.

CAL FIRE's emphasis on wildfire mitigation measures has grown significantly over the last decade, with the quadrupling of state funding dedicated to mitigation. However, greater investment and coordination are needed, especially for community-scale initiatives such as home hardening and defensible space.⁶ To begin addressing this gap, Assembly Bill 38 (2019) directed the California Office of Emergency Services and CAL FIRE to enter into a joint powers agreement to establish the California Wildfire Mitigation Program. This program provides financial assistance to low- to moderate-income households for retrofitting, hardening, and creating defensible space for homes at high wildfire risk. While it is funded through state and federal resources (mainly FEMA hazard mitigation grants), the program is primarily implemented by localities due to limited CAL FIRE staff capacity and the need for community buy-in. Currently, pilot programs are underway in Lake, San Diego, Shasta, Siskiyou, El Dorado, and Tuolumne counties. With additional resources, this program could be expanded to coordinate with subregional wildfire mitigation agencies in the Bay Area to further address home wildfire risks.

Other state agencies, such as the Office of Emergency Services, the Department of Conservation, the Department of Parks and Recreation, the California Public Utilities Commission

⁴ California Department of Forestry and Fire Protection (CAL FIRE), "Cooperative Efforts," <https://www.fire.ca.gov/what-we-do/fire-protection/cooperative-efforts/>; California Department of Forestry and Fire Protection (CAL FIRE), *California State Responsibility Areas*, accessed October 16, 2025, <https://gis.data.cnra.ca.gov/datasets/CALFIRE-Forestry::california-state-responsibility-areas/explore?location=37.813575%2C-122.545004%2C10.05>.

⁵ CAL FIRE, "Cooperative Efforts."

⁶ Legislative Analyst's Office, *Overview of State Wildfire Resilience Funding, Actions, and Considerations*, April 23, 2025, <https://lao.ca.gov/handouts/resources/2025/Overview-of-State-Wildfire-Funding-Actions-Considerations-042325.pdf>; Sarah Atkinson, "Financing Climate Adaptation and Hazard Mitigation, Part 2: Growing Wildfire Resilience Investments," *SPUR News*, September 23, 2025, <https://www.spur.org/news/2025-09-23/financing-climate-adaptation-and-hazard-mitigation-part-2-growing-wildfire>.

(CPUC), and numerous conservancies, manage forest health and state grant programs. For example, the CPUC has its own “fire-threat” maps, developed in collaboration with CAL FIRE, that identify areas with a higher risk of fire related to utilities or powerlines.⁷ Furthermore, electric utilities are required to dedicate funding from their ratepayers (and shareholders, under Senate Bill 254) to reduce the risk of utility-sparked wildfires through vegetation management, weather monitoring systems, power line burial/insulation, and the installation of stronger poles, as outlined in their wildfire mitigation plans.

Local Responsibility Areas (Managed by City and County Fire Agencies)

Local responsibility areas (LRAs) are lands where city or county fire departments hold primary responsibility for wildfire prevention and suppression. LRAs are typically in incorporated or urbanized areas where local governments provide fire protection services. City and county fire departments, fire districts, and resource conservation districts manage LRAs in coordination with the State Fire Marshal, which operates under CAL FIRE through the enforcement of local and state defensible space requirements, building fire codes as applicable, and fuel reduction projects. A handful of nongovernmental players also contribute to wildfire management in the LRAs.

A **fire department** is typically a department of a city or county government, funded through the general fund or with monies from additional sales, parcel, and other taxes. It protects life, property, and the environment by responding to fires and emergencies, enforcing fire codes, educating the public, supporting wildfire mitigation, and maintaining readiness for all-hazard response. Some counties have consolidated fire departments; two or more departments service small jurisdictions that choose to merge to improve efficiency.

A **fire protection district** is a type of special district, formed under state law, that is independent of any city or county government. Fire protection districts and fire departments provide many of the same core services — fire suppression, emergency medical response, and public safety — but districts typically serve several smaller communities and adjacent unincorporated areas. They are governed by a board of directors and are funded by property taxes from the area they serve, making them more resilient to budget deficits.

A **resource conservation district (RCD)** is another type of special district, governed by a board of directors, that implements strategies to conserve natural resources (soil, water, habitat, watershed) on both public and private wildlands. RCDs provide education and technical, financial, and planning assistance to landowners. An RCD operates in every Bay Area county — except San Francisco, which has no extensive undeveloped wildlands.

⁷ California Public Utilities Commission, “Fire-Threat Maps and Fire-Safety Rulemaking,” <https://www.cpuc.ca.gov/industries-and-topics/wildfires/fire-threat-maps-and-fire-safety-rulemaking>.

LRAs have many supporting players managing different aspects of the fire risk reduction puzzle. For this research, SPUR is highlighting three supporting players:

Fire Safe councils, formed through a state initiative, are nonprofit organizations that help cities or towns secure grants to undertake open-space fuel management and home resilience or to develop community wildfire protection plans (CWPPs). California has some 300 Fire Safe councils, in addition to the State Fire Safe Council.⁸ The councils are often consumed with writing and applying for grants to fund their projects — time that could be better spent executing projects and educating the public. Vegetation grows back each year, and effective fire mitigation requires ongoing investment, which can conflict with time-limited grants that lapse, leaving a gap in resilience activities.

Firewise communities are voluntary, community-driven programs designed to help neighborhoods in wildfire-prone areas reduce their risk and increase resilience. The National Fire Protection Association leads these programs in coordination with CAL FIRE. Many Firewise communities can exist within a city/town or within a master-planned community/homeowners' association. Firewise communities can accommodate 8 to 2,500 single-family dwelling units, but they must include local fire departments, state forestry agencies, elected officials, emergency managers, and property management companies as partners.⁹

Prescribed burn associations (PBAs) are community networks that help private landowners safely conduct “good fires” or intentional burns to restore ecosystems. California has 27 PBAs — several in the Bay Area, including the Good Fire Alliance (Sonoma and Marin counties), the Napa County PBA, and the Bay Area Prescribed Fire Council.¹⁰ Before they were criminalized in 1850, intentional burns were used by Indigenous communities to cultivate biodiversity and maintain healthy forests. This practice was finally decriminalized in 2022.¹¹ Santa Clara’s Fire Safe Council was recently awarded a state grant to set up a South Bay PBA to restore intentional burns by working with Indigenous communities, including the Ohlone, Tamien, and Amah Mutsun tribes, as well as private landowners.¹² While CAL FIRE also undertakes prescribed burns and homeowners can request projects on their property, the agency is resource-constrained, and wait times are long.¹³

⁸ California Fire Safe Council, “Find A Fire Safe Council,” <https://cafiresafecouncil.org/resources/map-of-fire-safe-councils/>.

⁹ National Fire Protection Association (NFPA), “Firewise USA,” <https://www.nfpa.org/education-and-research/wildfire/firewise-usa>.

¹⁰ California Prescribed Burn Association, “Home,” <https://calpba.org/>.

¹¹ Russell “Buster” Attebery, “CA Recognition of Cultural Burns Can Right a Historic Wrong,” *CalMatters*, September 2024, <https://calmatters.org/commentary/2024/09/wildfire-cultural-burn-california-tribes/>.

¹² Nollyanne Delacruz, “Santa Clara County May Form Its First Prescribed Burn Association, Pending State Grant,” *Mercury News*, October 1, 2025, <https://www.mercurynews.com/2025/10/01/santa-clara-county-may-form-its-first-prescribed-burn-association-pending-state-grant/>.

¹³ Tatun McConnell, “California Needs More Fire: Why Is It Still So Hard to Start a Prescribed Fire in California?” *Sierra*, November 5, 2022, <https://www.sierraclub.org/sierra/california-needs-more-fire-prescribed-burn>.

Government, Nonprofit, and Private Entity Coordination

To begin to address the gaps in collaboration at the SRA and LRA levels, the California Fire Safe Council and CAL FIRE launched the Wildfire County Coordinator Program in 2021 with the goal of improving coordination among fire protection departments and districts, RCDs, Fire Safe councils, Firewise communities, and PBAs. CAL FIRE funds a dedicated coordinator in almost every county of California. The coordinator is usually integrated into a countywide organization, such as a Fire Safe council, fire district, or RCD, and is tasked with helping secure funding, implementing mitigation projects, and engaging the public. County coordinators are also tasked with carrying out California's Wildfire and Forest Resilience Action Plan at the county level and with accelerating home hardening and defensible space implementation. SPUR found that, presently, the utility of the Wildfire County Coordinator Program varies by locality. Some county coordinators are more effectively integrated into county governance and are, therefore, more embedded in the work. Other coordinators may lack long-term relationships in the county or may be located in a county department that is not well-integrated with other entities focused on wildfire mitigation and prevention, limiting their ability to coordinate the key players. With the development of cross-jurisdictional governance models working at the county and cross-county levels, county coordinators are well-positioned and, importantly, *paid* to help secure sustainable funding for these entities and to ensure alignment within and across county lines.

California's Policy Landscape for Wildfire Resilience

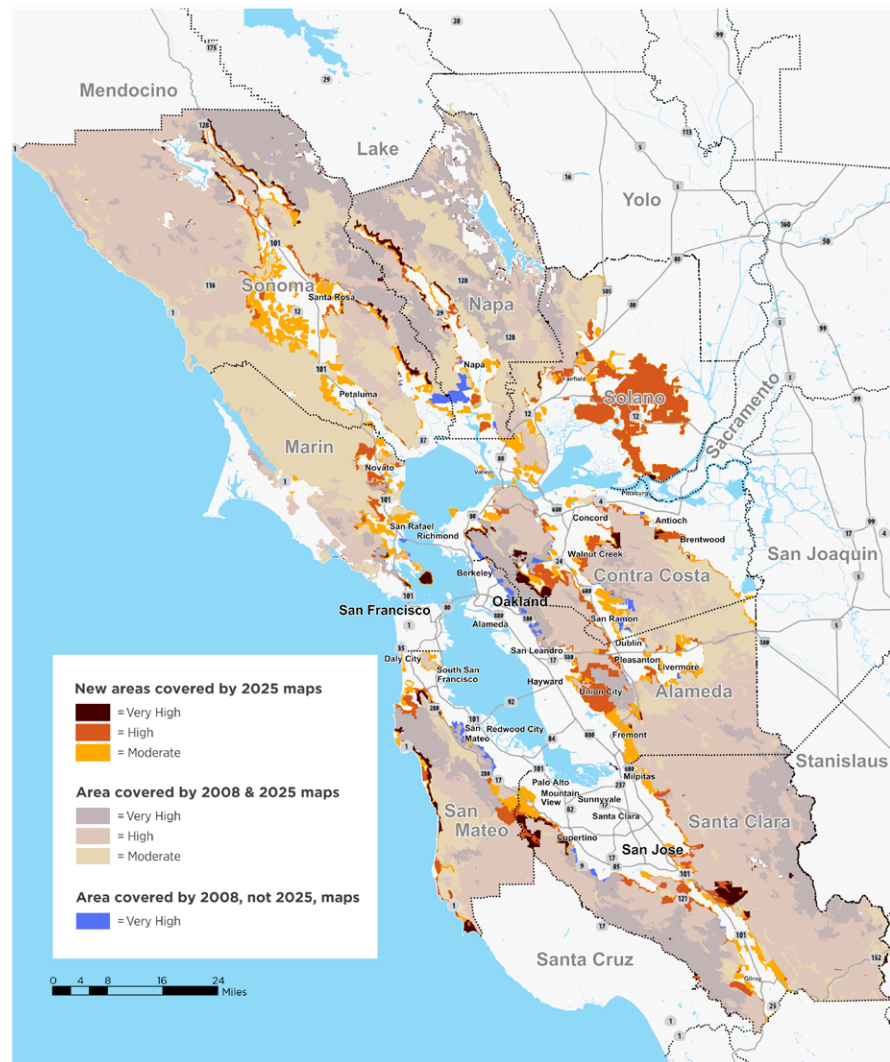
Despite the state's investments in wildfire resilience and strict policies to mitigate wildfire destruction, the need for community and individual-scale actions has made enforcement slow and reliant on the participation of city and county agencies managing the local responsibility areas. Unfortunately, most city and county governments lack the resources to effectively implement the state's wildfire mitigation policies. Retrofitting costs are especially high for California's existing buildings, most of which were built before these policies were enacted. Furthermore, state efforts, such as Fire Hazard Severity Zone maps (exhibits 3 and 4), are sometimes misaligned with local conditions, leading to gaps in mitigation or requiring local governments to adopt their own, more stringent mitigation policies, which may not be politically feasible.

EXHIBIT 3

Comparison of 2025 and 2008 Fire Hazard Severity Zone Maps

CAL FIRE maps classify wildfire hazard severity into moderate, high, and very high zones in state responsibility areas and local responsibility areas. They are intended to inform land use planning, building code requirements, public safety measures, and other wildfire mitigation strategies. CAL FIRE updated the FHSZ maps in 2025. The maps were previously updated in 2007-08, representing a large gap in time when much has been learned about wildfire behavior. Local governments can adopt expanded hazard maps or defensible space requirements to better align with local conditions, which the City of Berkeley did in 2025.

Source: MTC/ABAG analysis using 2008 and 2025 CAL FIRE FHSZ maps.



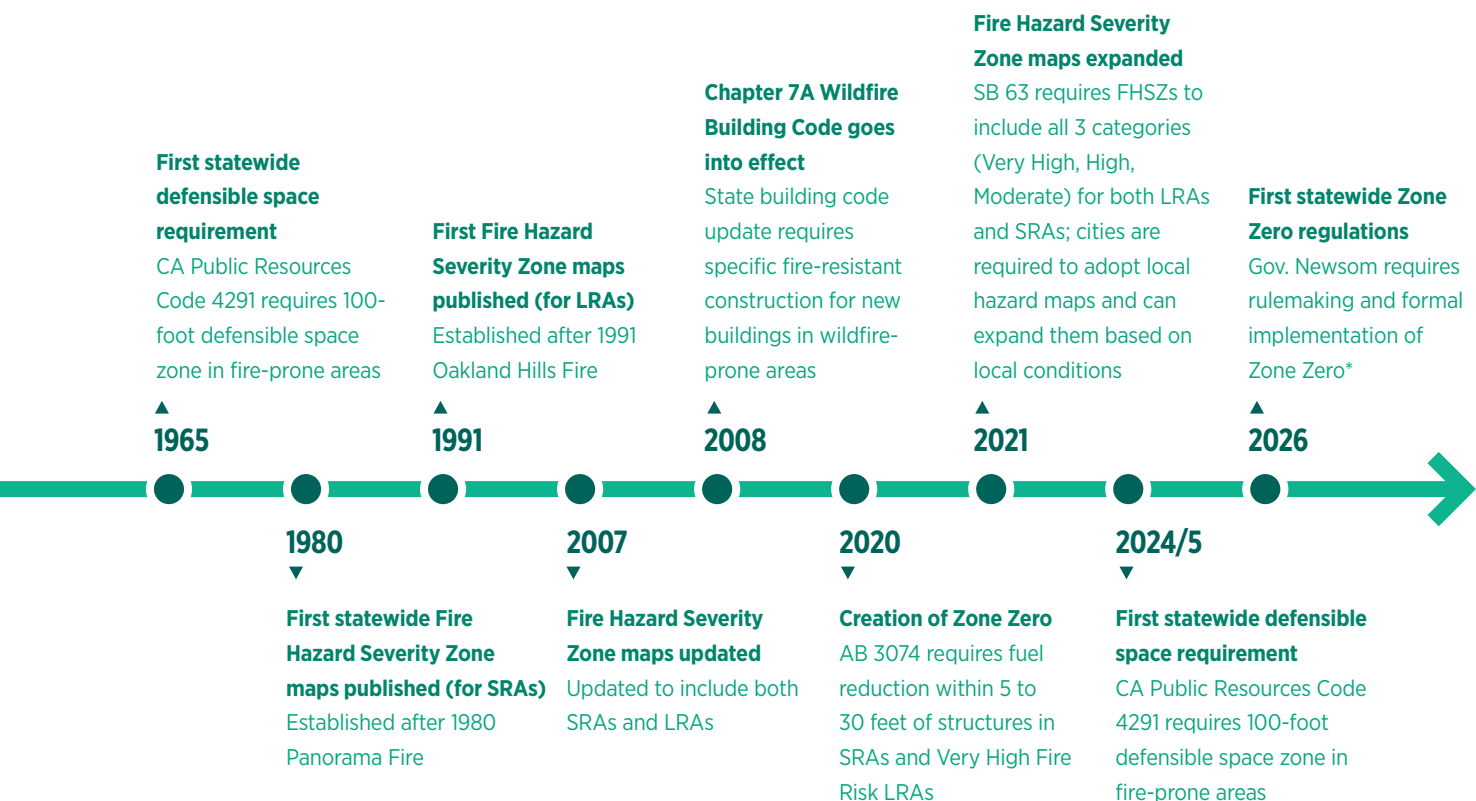
In the wake of the LA fires, lawmakers introduced 90 bills related to wildfire risk, about half of which pertained to mitigation.¹⁴ Governor Newsom signed 23 of them (Appendix C).¹⁵ The resulting state programs and regulations will be managed by CAL FIRE, the California Department of Insurance (CDI), and state agencies. City and county government agencies will implement them at the local level.

Many of the state's policies advancing wildfire mitigation at the community scale are driven by the state's FHSZ maps. These maps are developed by CAL FIRE to identify areas of California with varying wildfire risk levels, based on factors such as vegetation, topography, weather patterns, and fire history. The maps categorize land into moderate, high, and very high hazard zones, and they inform land-use planning, building code requirements, defensible space standards, and, ultimately, insurability. By providing a consistent, science-based assessment of wildfire hazard, the maps help state and local governments, developers, and residents understand and mitigate fire risk — especially in SRAs and LRAs where urban development and forest and grassland vegetation intersect.

EXHIBIT 4

Evolution of Wildfire Mitigation Policies in California

Source: SPUR analysis of California's wildfire policy.



*Delayed from December 2025 to March 2026

¹⁴ Sameea Kamal, "Why Bills to Help Prevent California Fires Fail," *CalMatters*, February 27, <https://calmatters.org/digital-democracy/2025/02/california-wildfire-prevention/>.

¹⁵ Office of Governor Gavin Newsom, "Governor Newsom Signs Bipartisan Legislation to Boost Ongoing Los Angeles Rebuilding Efforts, Strengthen Future Disaster Response and Recovery," October 10, 2025, <https://www.gov.ca.gov/2025/10/10/governor-newsom-signs-bipartisan-legislation-to-boost-ongoing-los-angeles-rebuilding-efforts-strengthen-future-disaster-response-and-recovery/>.



This backyard space showcases Zone Zero guidance in action: no vegetation within five feet of the home, non-combustible gravel walkways, and small potted plants near the home in non-combustible and moveable pots.

Photo: Amy Jo Detweiler¹⁶

Furthermore, the state's FHSZ maps indicate where the state's long-standing defensible space requirements are enforced.¹⁷ In 2020, Assembly Bill 3074 passed with bipartisan support, updating the state's defensible space requirements to include intense fuel reductions from 5 feet to 30 feet around structures and to create an ember-resistant zone within 5 feet of structures, known as Zone Zero.¹⁸ These regulations were originally set to take effect in 2023, but they were delayed because the accompanying guidance and regulations have not yet been issued by the Board of Fire and Forestry (CAL FIRE's regulatory arm).¹⁹ Following the LA fires, Governor Newsom's Executive Order (N-18-25) directed CAL FIRE to fast-track the delayed rulemaking for Zone Zero, with an initial deadline of December 2025. This deadline has since been further delayed until March 2026, meaning that existing homes may not be required to comply until 2029.²⁰ Zone Zero compliance

¹⁶ Amy Jo Detweiler, *Fire-resistant Plants for Home Landscapes*, PNW 590, Oregon State University Extension Service, October 2023. Photograph in "Figure 6," <https://extension.oregonstate.edu/catalog/pub/pnw-590-fire-resistant-plants-home-landscapes>, accessed December 2, 2025.

¹⁷ Trần Nguyễn, "California Is Years behind in Implementing a Law to Make Homes More Fire Resistant," *AP News*, January 17, 2025, <https://apnews.com/article/california-defensible-space-zone-zero-ember-resistant-73739a63eafc6239753152f19e7cc81f>.

¹⁸ California Assembly, *Assembly Bill 3074: Fire Prevention: Wildfire Risk: Defensible Space: Ember-Resistant Zones*, 2019–2020 session, chaptered September 29, 2020, accessed October 16, 2025, https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201920200AB3074.

¹⁹ Trần Nguyễn, "California Years Behind in Implementing Defensible Space Law," *Carrier Management*, January 2025, <https://www.carriermanagement.com/news/2025/01/22/270885.htm>.

²⁰ California Governor, *Executive Order N-18-25: Urban Conflagration*, issued February 6, 2025, <https://www.gov.ca.gov/wp-content/uploads/2025/02/EO-N-18-25-Final.pdf>.

will be required on properties within state responsibility areas and in local responsibility areas in the Very High Fire Severity Zone.²¹ Trusted local and regional entities will need to take the lead on implementing forthcoming Zone Zero requirements across the Bay Area.

Role of Local Governments in Institutionalizing State Resilience Goals

Beyond state policy, local ordinances and planning efforts are quickly reshaping the wildfire resilience landscape. Numerous planning documents guide wildfire prevention efforts, including community wildfire protection plans (CWPPs), which are used as a central planning tool. CWPPs, which were created by the Healthy Forests and Restoration Act of 2003, are locally developed plans that identify and prioritize strategies to reduce wildfire risk to people, property, and natural resources.²² CWPPs are required documents for CAL FIRE grant funding eligibility and are typically created by counties, fire agencies, and community groups with public input. They often align with or are integrated into local hazard mitigation plans — a prerequisite for FEMA funding — as well as city and county general plans through local safety elements, CAL FIRE unit fire plans, utility wildfire mitigation plans, urban forestry plans, and California’s Wildfire and Forest Resilience Task Force Action Plan. Plan integration ensures coordination across agencies and funding sources.

Furthermore, CWPPs support local communities’ implementation of state requirements, such as the wildland-urban interface (WUI) building code and defensible space code, in local FHSZs, as well as identify local conditions that are not well incorporated into state maps. These hazard maps are critical to state and local wildfire mitigation planning, but they may not capture every “at-risk” community. For example, Coffey Park, a suburb of Santa Rosa, was almost completely consumed by the Tubbs Fire in 2017 despite being located outside of what CAL FIRE designates as a “high” or “very high” wildfire hazard zone, making it exempt from regulations that require buildings in high-risk areas to be fire-resistant.²³

Local governments can take a more risk-averse approach to state fire hazard maps in their wildfire protection planning, although not all have the political will or public support to do so. Earlier this year, when two of its wildland-adjacent neighborhoods were removed from the state’s latest CAL FIRE hazard maps, exempting them from Zone Zero regulations, the City of Berkeley amended the Fire Code, Title 24 Part 2 of the California Building Code, and re-added defensible space requirements based on local conditions and risk. By contrast, in July 2025, the Los Angeles County Board of Supervisors approved local hazard maps that exclude 60% of homes in Altadena — the area most impacted by the 2025 Eaton Fire — making these homes exempt from building back with fire-resistant materials.²⁴ This move has insurance repercussions: California state law

²¹ Mendocino County Regional Fire Department, *Zone 0 Frequently Asked Questions*, February 26, 2025, <https://www.mcrfd.org/files/08540e0ac/Zone+0+Frequently+Asked+Questions.pdf>.

²² ResilientCA, “Community Wildfire Protection Plans | ResilientCA,” <https://resilientca.org/plans/community-wildfire-protection-plans/>.

²³ Matthew Zeitlin, “California Has America’s Strictest Wildfire Code,” *Heatmap News*, January 16, 2025, <https://heatmap.news/climate/california-wildfire-building-code>.

²⁴ Jeff Collins, “LA County Adopts Fire Maps That Leave Out Much of Altadena’s Burn Area,” *Los Angeles Daily News*, July 28, 2025, <https://www.dailynews.com/2025/07/22/la-county-adopts-fire-maps-that-leave-out-much-of-altadenas-burn-area/>.

requires insurance companies that cover full replacement costs to include coverage for building code upgrades to meet wildfire-resistant standards; residents outside of WUI code areas must pay for these upgrades out of pocket or forgo the opportunity to build resiliently altogether.²⁵

Hazard maps are crucial for land use planning and for aligning building codes with local vulnerability. They are meant to highlight where mitigation efforts are most needed and to help prioritize resource allocation. As insurance begins to reflect community mitigation and home hardening efforts, accurately mapping and addressing risk has become even more critical.

Role of the State in Enhancing Risk Assessment and Stabilizing Insurance Coverage

Hazard maps are not explicitly used in insurance underwriting or pricing, but they dictate certain wildfire mitigation requirements and activities that directly contribute to a community's insurability. The California Department of Insurance has authority over the insurance market in California, acting as the state's consumer protection agency for insurance and reviewing insurance policies and rate changes.

In response to California's escalating wildfire risks and the resulting insurance market instability, the state has introduced legislative and regulatory measures to enhance risk assessment and stabilize coverage availability. A pivotal development is the incorporation of forward-looking catastrophe risk modeling into insurance rate-setting. Historically, California was the only state to prohibit insurers from using such models. However, the state and CDI have now approved the use of these models for insurance companies that agree to provide and maintain coverage in high-risk areas, enabling insurers to assess future wildfire risks more accurately and set premiums accordingly.²⁶

Although CDI currently has no authority to regulate insurance companies' underwriting decisions, it does require companies to offer discounts to policyholders who mitigate their wildfire risk under the Safer from Wildfires framework.²⁷ In fact, Assembly Bill 1, one of the 23 signed bills addressing wildfire management in the 2025–2026 legislative session, requires the CDI to regularly update the Safer from Wildfires regulations with lists of building- and community-level fire-hardening measures that insurance companies must take into account when offering premium discounts.²⁸

Growing losses from fires in California have put more pressure on insurance companies to be selective in their underwriting: 7 of the 12 largest home insurance companies in California have limited their coverage since 2022.²⁹ State Farm, which has the largest market share in the state,

²⁵ California Insurance Code § 10103, https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=INS§ionNum=10103.

²⁶ California Department of Insurance, "Department of Insurance Expanding Coverage for Californians Who Need It Most," Press Release 055–2025, August 1, 2025, <https://www.insurance.ca.gov/0400-news/0100-press-releases/2025/release055-2025.cfm>.

²⁷ California Department of Insurance "Commissioner Lara Enforces Nation's First Wildfire Safety Regulation to Help Drive down Cost of Insurance," Press Release 076–2022, October 17, 2022. <https://www.insurance.ca.gov/0400-news/0100-press-releases/2022/release076-2022.cfm#:~:text=The%20Safer%20from%20Wildfires%20regulation,keep%20pace%20with%20increased%20costs>.

²⁸ Connolly, AB 1: Residential Property Insurance: Wildfire Risk, 2025, https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1.

²⁹ California Department of Insurance, *California's Sustainable Insurance Strategy Slides*, 2023, <https://www.insurance.ca.gov/0400-news/0100-press-releases/2023/upload/California-s-Sustainable-Insurance-Strategy-slides.pdf>.

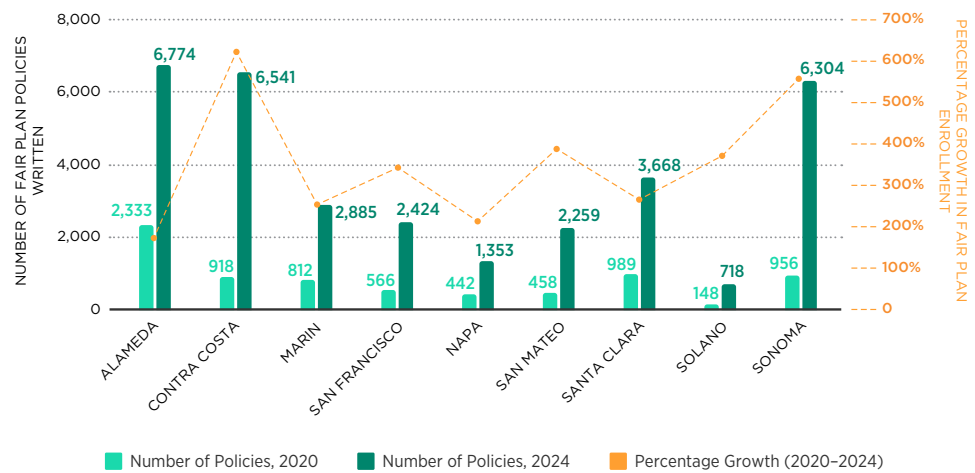
cut 70% of its policies in a Pacific Palisades zip code in 2024, leading to an 85% increase in local enrollment in what is considered the state's insurer of last resort in that same area — the state-mandated, industry-funded FAIR Plan administered by the CDI.³⁰ While home insurance in California is actually cheaper than in many states, non-renewals and underinsurance have left many property owners even more vulnerable.³¹ Data on rising insurance premiums and non-renewals is not available by county, but a look at FAIR Plan enrollment indicates an increasingly volatile insurance market (Exhibit 5).

EXHIBIT 5

Change in FAIR Plan Enrollment for the Bay Area, 2020–2024

Contra Costa and Sonoma counties experienced the most dramatic enrollment increases, suggesting significant private insurance market withdrawals and underinsurance in these high-risk areas.

Source: SPUR analysis of [CA Fair Plan Policy Growth \(residential, commercial, and business owner\) by Fiscal Year Data by County](#). Other source.



Between 2020 and 2024, the number of new California FAIR Plan insurance policies varied widely across Bay Area counties, reflecting shifting insurance market pressures. Contra Costa and Sonoma counties experienced the most dramatic increases, with the number of policies growing 612% and 563%, respectively, suggesting significant private insurance market withdrawals and underinsurance in these high-risk areas. Counties such as Alameda and San Francisco experienced comparatively lower policy growth increases, though they were still notable given their urban contexts. Overall, the data illustrate how insurance access pressures are intensifying across the region, particularly in suburban and semi-rural counties at the wildland-urban interface.

³⁰ Alana Semuels, "Home Losses From the LA Fires Hasten 'An Uninsurable Future,'" *TIME*, January 9, 2025, <https://time.com/7205849/los-angeles-fires-insurance/>.

³¹ Augustina Ullman and Eric McGhee, "A Deeper Look at California's Homeowner Insurance Challenges," Public Policy Institute of California, blog post, April 10, 2025, www.ppic.org/blog/a-deeper-look-at-californias-homeowner-insurance-challenges/?utm_source=chatgpt.com.

Major Fires Affecting the Bay Area in the Past Decade

Fires both within and beyond the nine-county Bay Area have reshaped the region by degrading air quality through drifting smoke, straining local fire agencies as crews are deployed statewide, and driving up insurance costs. Ultimately, major fires across California have deepened public awareness of wildfire risk in the Bay Area, creating a broader sense of urgency and willingness to support mitigation, preparedness, and resilience investments. The 1991 Oakland Tunnel Fire destroyed nearly 3,000 homes and prompted major updates to local fire codes. The 2017 North Bay fires (Tubbs, Atlas, and Nuns) burned more than 140,000 acres, and the 2020 lightning-driven fires (including the CZU, SCU, and LNU complexes) surrounded the Bay Area, burning more than a million acres across multiple counties and causing the memorable “orange skies day.” Interviews conducted for this research identified the 2017 and 2020 fire sieges as critical turning points for wildfire management in the Bay Area.

NAME (CAUSE)	COUNTY	DATE	ACRES BURNED	STRUCTURES LOST	DEATHS
Tubbs (electrical)	Napa and Sonoma	October 2017	36,807	5,640	22
Atlas (power lines)	Napa and Sonoma	October 2017	51,624	780	6
Nuns (power lines)	Napa and Sonoma	October 2017	56,556	1,350	3
Camp Fire (power lines)	Butte	November 2018	153,336	18,800	85
Kincade Fire (power lines)	Sonoma	October 2019	77,758	325	0
CZU Lightning Complex (lightning)	San Mateo, Santa Cruz	August 2020	86,509	1450	1
SCU Lightning Complex (lightning)	Santa Clara, Alameda, Contra Costa, San Joaquin, Merced, Stanislaus	August 2020	396,624	220	0
LNU Lightning Complex Fire (lightning)	Napa, Sonoma, Yolo, Stanislaus and Lake	August 2020	363,220	1,490	6
North Complex (lightning)	Plumas, Butte	August 2020	318,935	2,300	16
Keller Fire (investigation underway)	Oakland Hills	October 2024	15	2	0
LA fires: Palisades and Eaton (investigation underway)	Los Angeles County	January 2025	40,644	12,500	30

Sources: Frontline Wildfire Defense, “California Wildfire History & Statistics,” <https://www.frontlinewildfire.com/wildfire-news-and-resources/california-wildfires-history-statistics/>; Zhiyun Li and William Yu, “Economic Impact of the Los Angeles Wildfires,” *UCLA Anderson School of Management – UCLA Anderson Forecast*, March 3, 2025, <https://www.anderson.ucla.edu/about/centers/ucla-anderson-forecast/economic-impact-los-angeles-wildfires>.

Collaborative Governance Models to Address Wildfire Resilience in the Bay Area

Wildfire knows no jurisdictional, political, or regional boundaries. Consequently, co-management of risk is imperative for wildfire prevention and mitigation. The Bay Area offers two models for this co-management: the Marin Wildfire Prevention Authority and the East Bay Wildfire Coalition of Governments (Exhibit 6). These models highlight two ways to collaborate across jurisdictions. The Marin JPA is formal, highly coordinated, and sustainably funded through a countywide parcel tax, and the East Bay Coalition is semi-formal and minimally funded through member dues. The East Bay model offers an easier pathway for cross-jurisdictional communication and planning, while the Marin model offers more robust funding and project coordination.

EXHIBIT 6

Collaborative Governance Models Summary

Source: SPUR.

	GOVERNANCE STRUCTURES	PARTICIPATING JURISDICTIONS	DEDICATED FUNDING?	PROS AND CONS
Model 1: Marin Wildfire Prevention Authority	Joint Powers Authority	17 voting-member agencies	Yes	Higher upfront effort required to establish JPA, but formal agreements make coordination easier. Powers are limited to least powerful member. Sustained by significant parcel tax funding.
Model 2: East Bay Wildfire Coalition of Governments	Non-binding memorandum of understanding	8 voting-member agencies	No	Lower upfront effort to establish coalition but more challenging to coordinate actions across members. Lacks significant funding.

Model 1: Marin Wildfire Prevention Authority

In 2017, when a series of deadly and destructive fires ripped through Napa and Sonoma counties, Marin County feared it was next. At the time, the county had 12 cities and towns and seven fire districts, and no single agency existed to coordinate them. With significant political support and public will, the Marin County Fire Department's 2018 *Lessons Learned* report and the 2019 Civil Grand Jury's *Wildfire Preparedness: A New Approach* called for a joint powers authority to coordinate wildfire management.³² In October 2019, after polling the community and local jurisdictions, the Marin County Board of Supervisors adopted the Marin Wildfire Prevention initiative, establishing the structure of a future joint powers authority. In March 2020, 70.8% of voters approved Measure C, creating a 10-year parcel tax fund and establishing the JPA: the Marin Wildfire Prevention Authority (MWPA).

³² Marin County Fire Department, *Lessons Learned: 2017 North Bay Fire Siege*, 2018, https://cdn.prod.website-files.com/6107823cbe8db485b50aa8f8/614d6fd05b5e5e1c23502ee7_2018_Lessons-Learned-2017-North-Bay-Fire-Siege.pdf; 2018–2019 Marin County Civil Grand Jury, *Wildfire Preparedness: A New Approach*, 2019, https://cdn.prod.website-files.com/6107823cbe8db485b50aa8f8/614d7219b0490efafc2dcda3_2019_MarinCountyCivilGrandJuryReport_WildfirePreparedness.pdf.

Governance

To be members of the MWPA, entities must have fire management jurisdiction and taxing authority. The MWPA's 17 voting members include Marin County, three cities (Larkspur, Mill Valley, and San Rafael), four towns, (Corte Madera, Fairfax, Ross, and San Anselmo), five fire protection districts (Kentfield, Novato, Sleepy Hollow, Southern Marin, and Stinson Beach), two community services districts (Marinwood and Muir Beach), the Bolinas Fire District, and the Inverness Public Utility District.

The MWPA Board of Directors is composed of one director from each member agency. When the board votes to approve new projects or financial documents or to adopt resolutions that support local planning, voting requirements ensure that no single member, even a member representing a more populated area, can dominate voting approvals. Since the JPA model is negotiated and agreed upon formally by members, it can be tailored to the needs and concerns specific to a subregion or purpose area.

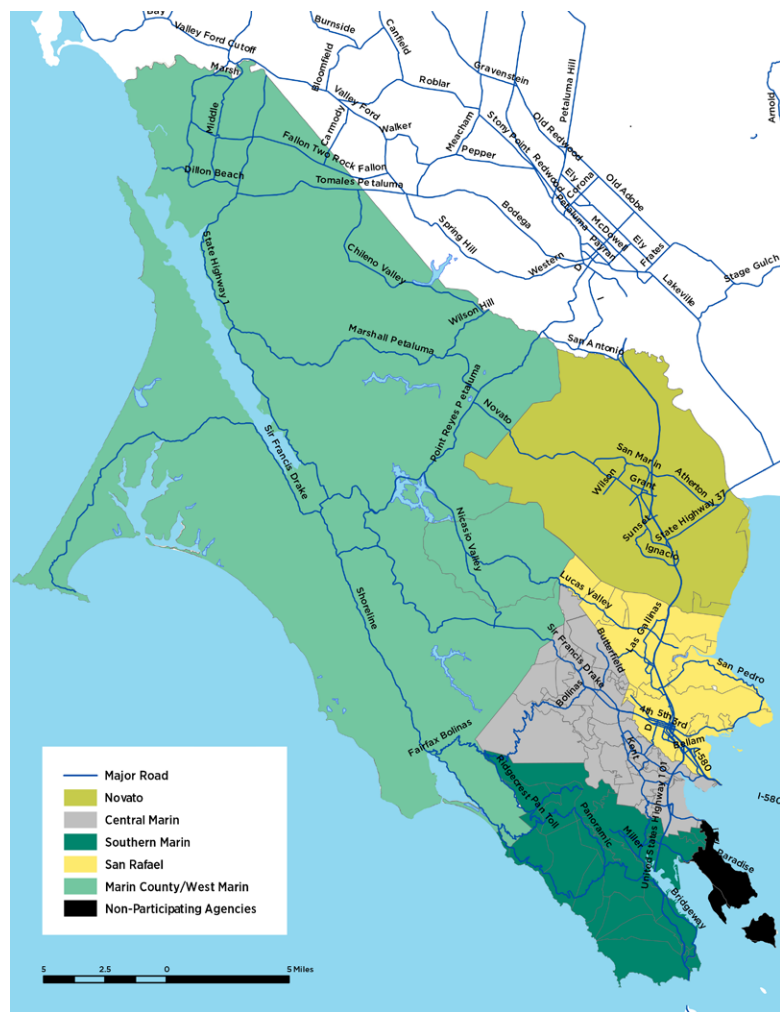
Within the JPA, there are also five operational zones designated for planning, and one board member from each zone serves on the Executive Committee. The MWPA's operational zones cover existing federal, state, and local responsibility areas. Marin County has an agreement with CAL FIRE to manage fire suppression in the SRA, and Marin County Fire has an agreement with the National Park Service to manage fire suppression in FRAs, which include the Golden Gate National Recreation Area, Muir Woods National Monument, and Point Reyes National Seashore (Exhibit 7).

EXHIBIT 7

Marin Wildfire Protection Authority's Operational Zones

The MWPA operates across five zones that are designated for planning and resource distribution. One board member from each zone serves on the Executive Committee.

Source: Marin Wildfire Prevention Authority.



While the MWPA develops the policy direction and creates and coordinates fire-adapted strategies, individual MWPA member fire agencies are responsible for fire incidents and wildfire prevention projects (including fire ordinances and policies) within their local service area. These fire agencies propose local projects for the MWPA work plan, conduct defensible space evaluations, publicize evacuation routes, and communicate red flag warnings and alerts. The MWPA member agencies participate in the Prescribed Burn Working Group, which includes tribal partners, utilizing the MWPA to identify priority areas for burns. Because the MWPA has no authority over member agencies, those agencies must provide input before new MWPA programs or policies are implemented.

Projects

The Marin County Community Wildfire Protection Plan (CWPP) is the guiding planning document for all entities within Marin County that undertake fire prevention and mitigation activities, including the MWPA. As indicated in its strategic plan, the main goals of the MWPA are (1) vegetation management and local wildfire prevention mitigation (fuel breaks, fire roads); (2) detection, alert, and evacuation in partnership with local law enforcement; (3) operation of local grant programs to assist residents in reducing fire risk; (4) public outreach and education related to wildfire prevention (led by Fire Safe Council of Marin); and (5) defensible space and home hardening evaluations and support. Utilizing the strategic plan and the CWPP, the MWPA's approach to risk reduction focuses on home hardening and defensible space actions first, and vegetation management second.³³ This strategy guides an annual work plan with goals that are monitored throughout the year.

Because at least one MWPA board member is on each city council, the MWPA works to align policies and building codes across the jurisdictions. Additionally, it acts as a liaison for fire agencies, the public, insurance companies, and the Insurance Institute for Business & Home Safety. The MWPA has begun to have one-on-one conversations with insurers in Marin County, showcasing the benefits of the county's approach and its progress toward community-scale resilience. Currently, insurance companies are largely blind to ongoing community-level mitigation, leaving individual homeowners to demonstrate their own mitigation efforts and seek piecemeal discounts. Individual homeowners often lack the necessary resources and information to navigate the technical and administrative requirements of mitigation efforts. However, programs such as the MWPA's Zone Zero Box Program allow governments to coordinate contractors, bulk-purchase materials, and align inspection schedules, reducing participation costs and barriers.

³³ Marin Wildfire Prevention Authority, "Vegetation Management & Wildfire Prevention," <https://www.marinwildfire.org/vegetation-management#:~:text=%E2%80%8Dunnatural%20levels%20of%20fuel%20loading>.

Zone Zero Box Program Provides Compliance Assistance to Residents

Local jurisdictions and homeowners are awaiting the state's Zone Zero regulations and bracing for the costs of vegetation clearance and re-landscaping. To get ahead of these challenges, the Marin Wildfire Prevention Authority, in partnership with the Marin Community Foundation, is launching the Zone Zero Box Program to streamline and finance defensible space implementation across Marin County. The program offers four tiers of assistance based on income and homeowner capacity:

- **Tier 1, full service, upper income:** MWPA coordinates the contractors and work; residents choose from options such as vegetation removal or addition of gravel, and residents pay for the service.
- **Tier 2, DIY:** Residents choose from MWPA's contractor list and landscaping recommendations and handle all the work themselves at no cost to MWPA.
- **Tier 3, economy of scale:** MWPA's contractors offer community-level discounts, with MWPA requiring reduced prices when multiple nearby homes must address similar hazards (for example, in Firewise communities). MWPA coordinates contractors and work.
- **Tier 4, full service, low income:** MWPA directly contracts work at no cost for low-income residents.

Because many residents have expressed frustration over changing landscaping norms, MWPA hopes the program will ease political pushback against Zone Zero mandates. While asking homeowners to redesign private yards for wildfire safety is challenging, broad implementation supported by financial and technical assistance could significantly improve both community resilience and home insurability. The MWPA's program may be a model for how other jurisdictions can help smooth the way for Zone Zero implementation.

Funding

One of the greatest strengths of the MWPA is its access to long-term, sustainable funding through the Measure C parcel tax, which raises approximately \$19 million to \$22 million annually (Exhibit 8). Before the tax was created, fire agencies applied for grants ad hoc, and the Marin Fire Safe Council spent much of its time applying for and securing grants as well. While grants are an important part of the revenue mix and can jumpstart an organization such as MWPA, they require significant administrative labor and hinder the ongoing vegetation maintenance required by fire prevention work.

EXHIBIT 8

MWPA Measure C Budget Allocations, 2020–2030

Most MWPA funds — 60% — go to MWPA core projects that serve the entire county of Marin. Up to 10% of these funds can be allocated for project administration. The remaining 40% of funds go to community-level defensible space, home hardening, and other efforts implemented by local agencies. Each of these three program areas may allocate up to 10% of its funding to administrative costs. In 2024, Measure C brought in \$21.2 million.

Source: Marin Wildfire Prevention Authority 2023–2024 Annual Report.

Local Wildfire Prevention Mitigation 20%

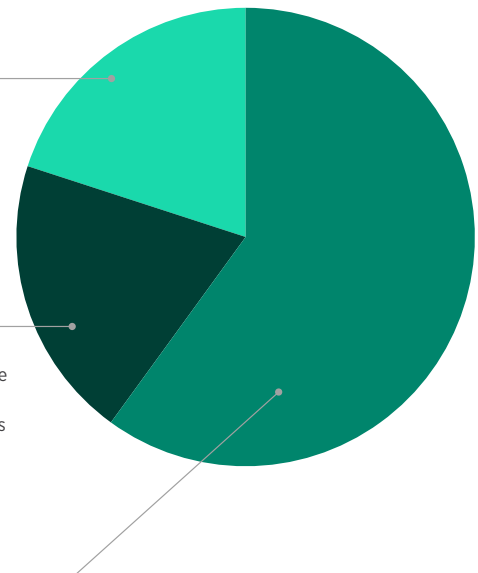
Funding supports member agencies' community-level/local wildfire prevention mitigation activities (for jurisdictions with no funding), including enhanced fire patrols for problem areas. In 2024, \$4.2 million was dedicated to local programs.

Defensible Space Evaluations and Home 20%

Individual agencies can administer evaluations and hardening programs. The goal is for every home to be inspected by trained inspectors every 2–3 years. In 2024, \$4.2 million was disbursed to member agencies for these programs.

JPA Core Projects 60%

This funding is dedicated to cross-jurisdictional projects, wildfire detection and evacuation, vegetation management, grants management, and public education through Fire Safe Marin. In 2024, \$12.5 million in Measure C proceeds was dedicated to Core Projects.



Over five years, Measure C requires that at least 80% of the average revenue generated by each operational zone for the JPA's core projects be spent in that zone; the remaining 20% can be reallocated to other zones based on local needs, allowing the MWPA to redirect funds from areas with higher tax revenue to low-resourced areas with higher risks. For example, 27% of the Measure C parcel tax revenue comes from San Rafael, which has large commercial spaces; only 6% comes from West Marin, where most of the flammable vegetation is located. In 2025, the MWPA allocated an additional \$350,000 to West Marin, where much of the risk is concentrated. This ability to holistically evaluate risk across the county and advocate for equitable resource-sharing and greater collaboration is key to MWPA's success.

Fire Safe Council of Marin Promotes Awareness and Safety

Serving as the public outreach and education arm of the Marin Wildfire Prevention Authority (MWPA), the nonprofit Fire Safe Council of Marin has been promoting wildfire awareness and safety in Marin since 1991, and it's currently the primary source of the MWPA/Measure C-funded public education, including the widely celebrated annual Ember Stomp Festival. The council participates as a non-voting member on MWPA's Advisory/Technical Committee. It manages a countywide curbside chipper program to help homeowners with vegetation clearing; offers professional training for landscapers, real estate agents, and contractors; hosts community preparedness workshops; develops Red Flag Warning signs; and implements goat-grazing projects. The council coordinates monthly meetings of Marin's 83 Firewise communities, aligning the priorities of the MWPA and the California Wildfire Mitigation and Prevention Authority at the hyper-local level. Firewise communities are 3.5 times more likely to address hazards such as combustible material and 3 times more likely to remove vegetation through the Chipper Program than non-Firewise communities.^a

^a Bill Tyler and Jen Guana, Fire Safe Council of Marin, interview by Colleen Corrigan, September 23, 2025.

Model 2: East Bay Wildfire Coalition of Governments

Like many Marin homes, a number of East Bay residences are located in the wildland-urban interface. In 1991, the Tunnel Fire consumed the Oakland and Berkeley hills. Fire departments quickly learned the limitations of not sharing radio frequencies and hose connections, limitations that slowed fire suppression efforts and led to significant changes in firefighting systems across California. As a result, the Hills Emergency Forum was formed to standardize operations. It later expanded to coordinate the development of local fire safety standards and codes, fuel-reduction strategies, and governmental and nongovernmental collaboration in the Oakland, Berkeley, and El Cerrito hills.³⁴ In October 2024, the Oakland Hills were impacted by the Keller Fire, which burned 15 acres and displaced 500 residents, reminding everyone of Oakland's vulnerability to fire and its desperate budget situation.

As early as 2019, a small group of East Bay community leaders and volunteers began conversations about how to manage the area's wildfire risks. Leaders felt strongly that fire is not just an issue for residents in the hills, but for all cities in the East Bay: embers can travel long distances, wildfire smoke can affect health in areas far from fires, and property values and insurance coverage can fall as wildfire hazard increases, further depleting city revenues. So, in April 2024, the East Bay Wildfire Coalition of Governments (EBWC) was formed when six cities and two counties signed a memorandum of understanding (MOU).

³⁴ "Hills Emergency Forum," last modified January 2025, accessed October 21, 2025, <http://www.hillsemergencyforum.org/>.

Governance

The EBWC worked with fire chiefs, city managers, and city councils to shore up support for a multi-jurisdictional entity focused on regional wildfire mitigation. Originally proposed as a JPA similar to MWPA but spanning two counties, the structure was transitioned to a memorandum of understanding on the basis of fire chiefs' concerns and other stakeholders' fears about the legality and costs of establishing a formal JPA. The EBWC initially received a \$25,000 gift from a community member and funding from the Bay Area Air District to establish support staff and pay for legal fees. It has since implemented a fee structure to provide seed funding for future activities. The EBWC covers western Alameda and Contra Costa counties, including areas designated by CAL FIRE as High or Very High fire hazard severity zones.

The EBWC's eight voting members are Alameda and Contra Costa counties and the cities of Berkeley, El Cerrito, Hercules, Oakland, Pinole, and Richmond.

Contra Costa County represents the unincorporated cities of El Sobrante, Kensington, North Richmond, Alamo, and Canyon, and Alameda County represents the unincorporated cities of Castro Valley, Fairview, Ashland, Cherryland, and Sunol.

Advising the EBWC and participating in its meetings are regional agencies and organizations, some of which are large landowners: the University of California, Berkeley, Lawrence Berkeley National Laboratory, the East Bay Regional Parks District, the East Bay Municipal Utility District, the East Bay FireSafe Alliance, and the Diablo Firesafe Council.

A number of cities are notably absent from EBWC, including Piedmont, Orinda, Moraga, and Lafayette. EBWC's effectiveness hinges on the voluntary buy-in of local jurisdictions with shared fire risks. As the coalition continues to expand its impact, the hope is that these jurisdictions see the value of participation. The coalition's and individual jurisdictions' mitigation efforts will be stronger when implemented in tandem.

Future Projects

The EBWC works to strengthen building and fire codes, support science-based vegetation management, advocate for wildfire-related legislation, improve evacuation and response programs, and secure new regional funding. Its immediate priorities are advancing home hardening and defensible space at the homeowner level and expanding funding for vegetation management across the region. The goal is for EBWC's collaborative, cross-county structure to increase grant competitiveness while fostering shared expertise, such as adapting Berkeley's Zone Zero design lookbooks for other jurisdictions. Coalition meetings regularly feature partners such as the state Wildfire County Coordinator Program, the East Bay Regional Park District, PG&E, and United Policyholders, covering topics from Zone Zero outreach to geographic information system tools such as the Wildfire Fuel Mapper.

The coalition's growing policy arm recently held its first Sacramento lobby day and regularly shares legislative updates with coalition members on California's Cap-and-Invest Program extensions, funding from which localities can use to increase resilience to climate change-related

risks, including wildfires. EBWC and its members are currently raising funding for a public information campaign on defensible space and home hardening. The effort acknowledges that education is key to voluntary compliance.

Funding

Unlike the MWPA, the EBWC does not have a dedicated cross-jurisdictional funding source for wildfire mitigation and vegetation management projects. Instead, it relies on individual members and local governments and fire agencies to fund and carry out such activities. The EBWC aims to coordinate and align priorities across two counties.

EBWC members recently passed a fee structure whereby each jurisdiction pays an allocation based on its size: Alameda and Contra Costa counties each contribute \$25,000, and cities each contribute from \$3,000 to \$9,000, for a total annual budget of \$75,000. At its September 24, 2025, meeting, the coalition voted to appropriate up to \$50,000 of its budget this year to create a public information campaign on Zone Zero and home hardening in collaboration with Fire Safe councils and county coordinators. In addition, several cities and counties within EBWC have dedicated funding streams for wildfire resilience tailored to local needs (Exhibit 9).

EXHIBIT 9

East Bay Tax Measures to Fund Wildfire Mitigation Programs

TITLE	JURISDICTION	POLICY AND PURPOSE
Measure X, 2020	Contra Costa County	A half-cent countywide sales tax, raising \$23 million annually for a variety of community needs, with about 12% of funding (since 2021) going to fire mitigation and emergency response projects: home hardening outreach, creation of fuel breaks, and increased fire services. ^a These projects are implemented by the Contra Costa County Fire District.
Measure FF, 2020 Emergency Response and Prevention	City of Berkeley	A parcel tax of 10 cents per square foot of improvements across the city, raising \$8.5 million annually for fire services, emergency response, 9-1-1 communication, hazard mitigation, and wildfire prevention. The measure has funded an average of 8,000 defensible space inspections every year as well as free neighborhood chipping services for all of Berkeley. For residents who are financially or physically unable to implement defensible space measures, the city offers the Resident Assistance Pilot Program and a eucalyptus tree understory cleanup and trimming program.
Measure MM, 2024 Wildfire Prevention Parcel Tax	City of Oakland	A parcel tax for 20 years on properties in the city's Very High Fire Hazard Severity Zone, raising \$2.67 million in 2025–2026 for implementing the city's 10-year Vegetation Management Plan. The special district tax approach allows the city to fund wildfire prevention activities in the entire zone rather than investing in parcel-by-parcel activities. Low-income homeowners and nonprofit rental housing corporations that serve senior, disabled, and low-income households are exempted from the tax.

Sources: Contra Costa County, "Measure X Community Impact," Contra Costa County, California, <https://www.contracosta.ca.gov/10249/Measure-X-Community-Impact>; City of Berkeley, "Measure FF: Sidewalk and Street Repairs Parcel Tax," City of Berkeley, California, <https://berkeleyca.gov/your-government/our-work/bond-revenue-measures/measure-ff>; SPUR, "Oak Measure MM – Special District Tax," *SPUR Voter Guide*, November 2024, <https://www.spur.org/voter-guide/2024-11/oak-measure-mm-special-district-tax>.

^a Contra Costa County, "Measure X Community Impact," accessed October 15, 2025, <https://www.contracosta.ca.gov/10249/Measure-X-Community-Impact>.

Takeaway: Shared Risk Means Shared Responsibility

Urban conflagrations like the January 2025 fires in Los Angeles require a fundamental transition from individual, property-level planning to a multi-jurisdictional approach, which entities such as the Marin Wildfire Prevention Authority and the East Bay Wildfire Coalition of Governments can facilitate, given adequate funding and authority. These entities help navigate regional differences in wildfire risk and act as trusted messengers on wildfire mitigation and insurability, thereby shoring up public support for mitigation investments. After all, shared risk requires shared responsibility. JPAs like the Marin Wildfire Prevention Authority and non-binding MOU structures like the East Bay Wildfire Coalition of Governments are incredibly effective at coordinating the limited resources of cities, counties, tribes, and special districts for community-scale wildfire resilience. Moreover, they are well-positioned to align building codes and local ordinances for a comprehensive approach to wildfire prevention and to advocate for effective state policy that addresses wildfire and multi-hazard risks as well as insurability.

Recommendations

Although many entities engage in wildfire management and response across California and the Bay Area, most coordination occurs informally across areas of shared risk. In the wake of the LA fires, experts have recommended that the Los Angeles region establish an LA County wildfire protection district to promote cross-county wildfire mitigation efforts. In light of these calls, the Bay Area and local jurisdictions must examine their existing (or non-existent) subregional coordination structures and assess their effectiveness in improving community-scale resilience.³⁵ This report presents three recommendations to guide local jurisdictions in improving wildfire mitigation initiatives. It also makes one recommendation to the California Department of Insurance regarding the engagement of insurance providers in community-scale wildfire resilience initiatives.

RECOMMENDATION 1

Bay Area jurisdictions with shared wildfire risk should establish cross-jurisdiction collaborative governance structures to effectively advance community-scale mitigation initiatives.

Who's responsible: *City and county government agencies that are not currently coordinating across neighboring areas with shared wildfire risks*

Wildfire risk reduction is most effective when planned and executed at the community scale rather than city by city, parcel by parcel, or home by home. Governments should formalize collaborative governance structures that integrate representatives from local jurisdictions, fire districts, major landowners, utilities, nonprofit organizations (such as Fire Safe councils), and residents. As illustrated by models from Marin County and the East Bay, coordinated formal and semi-formal structures enable shared decision-making, resource pooling, and alignment of diverse actors responsible for vegetation management, defensible space, home hardening, and public education. San Mateo, Santa Clara, Napa, and Sonoma counties, which have large swaths of land designated as high and very high fire hazard, would benefit from collaborative governance not just during fires, but in preventing them.³⁶

³⁵ A similar process has been sparked by the Bay Conservation and Development Commission's recently released Regional Shoreline Adaptation Plan, a guidance document on subregional planning for and cross-jurisdictional coordination of efforts to mitigate sea level rise.

³⁶ California Office of the State Fire Marshal, "Fire Hazard Severity Zones," <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>.

Collaborative governance can take several forms. A joint powers authority, like the Marin Wildfire Prevention Authority, is one formal governance structure. A special district, as recommended by the Blue Ribbon Commission on Climate Action and Fire Safe Recovery for Los Angeles County, is another formal governance structure. A special district is a hybrid state agency and JPA created by state legislation to perform a specific function.³⁷ A less formalized partnership structure is the non-binding memorandum of understanding used by the East Bay Wildfire Coalition of Governments.³⁸ MOUs can provide benefits similar to those of JPA agreements for collaboration but at a lower upfront cost. No matter the model, there are four keys to success:

1. The collaborative has defined goals.
2. Each participating entity has a defined role.
3. Authority is evenly distributed to empower local leadership and buy-in.
4. Funding sources are stable over the long term.

By creating joint planning mechanisms, communities can coordinate compliance with new state-mandated standards such as Zone Zero and can gather and share data on community-scale wildfire mitigation progress with a goal of persuading insurance companies to recognize those activities through incentives or other market responses.

RECOMMENDATION 2

Bay Area jurisdictions should establish financing mechanisms that ensure continuity of actions and sharing of resources across jurisdictional boundaries — including nontraditional models that incorporate public and private partners.

Who's responsible: City and county governments and state and local policymakers, private partners

Effective wildfire mitigation requires sustained investment. Most local governments rely on short-term grants or one-time funding cycles that undermine the continuity of vegetation management, local policy development, defensible space enforcement, and home hardening programs. Local fire departments already report being understaffed and under-resourced in California, while wildfire risk grows due to climate change and development in the wildland-urban interface.³⁹ As the federal government continues to pull funding for climate resilience, local governments must collaborate to adopt dedicated, multi-year financing structures — such as sales taxes, parcel taxes, bonds, and other tools — to provide stable funding streams for wildfire resilience activities. Ideally, funding is shared by lower- and higher-resourced jurisdictions and is directed where risk is greatest.

³⁷ The San Mateo County Flood and Sea Level Rise Resiliency District, known as OneShoreline, is California's first special district dedicated solely to sea level rise and flooding. Sarah Atkinson, "Governing Adaptation: Why the Bay Area Needs Regional Action on Sea Level Rise," *The Urbanist*, no. 578 (Fall 2025), November 2025, <https://www.spur.org/publications/urbanist-article/2025-11-02/governing-adaptation>.

³⁸ An MOU is also used by the Oakland-Alameda Adaptation Committee to advance collaborative shoreline planning in the face of sea level rise.

³⁹ Iain Hoey, "Firefighter Staffing Levels in California Under Scrutiny Amid Wildfire Risk," *Fire & Safety Journal Americas*, January 29, 2025, <https://fireandsafetyjournalamericas.com/firefighter-staffing-levels-in-california-under-scrutiny-amid-wildfire-risk/>.

Advancing new public tax measures in the Bay Area is notoriously difficult because voter resistance to tax increases remains strong, and most new or special taxes require approval by two-thirds of voters. One reason for the resistance is that local tax measures are generally regressive, placing a disproportionate burden on lower-income residents, which raises equity concerns unless exemptions are provided, as in Oakland's Measure MM Wildfire Prevention tax. Another reason for the resistance is that taxpayers shoulder the burden of resilience investments that benefit not just themselves but also utilities, developers, and others. Addressing the region's resilience needs will therefore require innovative financing grounded in shared risk and shared value, supported by better data to quantify avoided losses and resilience dividends.⁴⁰ Three innovative financing models with cross-sector partnerships are beginning to demonstrate promise.

Forest Resilience Bond: The Forest Resilience Bond (FRB), managed by the nonprofit Blue Forest, is an innovative financing mechanism for landscape-scale forest management in the West. The FRB accelerates the pace and scale of restoration work by covering the upfront costs through private capital. It could be a model for many regions in California.

Here's how it works: Investors, including utilities, insurance companies, philanthropic foundations, and private companies, provide upfront capital for planned forest management projects that may take years to complete due to public funding timelines and capacity constraints. A nongovernmental partner, such as the National Forest Foundation, receives 0% interest loans and grants from these investors to hire contractors and manage activities such as tree clearing and thinning, prescribed burns, meadow restoration, and sustainable biomass fuel generation with leftover lumber. The beneficiaries, including government agencies and public and private partners in the region, reap the rewards in the form of reduced wildfire smoke and property loss, improved water quality, biodiversity protection, carbon storage, recreation opportunities, and so on. The investors receive a modest rate of return once the project is completed, and the beneficiaries repay the FRB through state and federal grants, in-kind donations, fee-for-service contracts, and profits from merchantable timber. The first FRB, Yuba I, was created in 2018 and involved three government agencies: the U.S. Forest Service, the Tahoe National Forest, and the Yuba Water Agency. FRBs have since expanded to include tribes, private landowners, Fire Safe councils, and JPAs. A similar finance model could be advanced in the Bay Area to fund mitigation.

Resilient LA Delta Fund: The Resilient LA Delta Fund is a novel public-private financing mechanism created in the wake of the Palisades and Altadena fires. The fund seeks to cover the "resiliency delta" — the cost gap between traditional funding (insurance, federal aid) for current building code compliance and the sums needed to adopt higher, evidence-based standards. Structured as a \$250 million blended-capital special-purpose vehicle, the fund will combine loan capital with grants (for income-qualifying households) to ensure widespread access.⁴¹ This fund will be available

⁴⁰ Matt Posner, "Rethinking Risk: Why Local Governments Can't Shoulder Climate Burdens Alone," *The Epicenter*, September 12, 2025, <https://www.epicenterinsights.com/why-local-governments-cant-shoulder-climate-burdens-alone/>.

⁴¹ Resilient Los Angeles, "The Resilient LA Delta Fund," <https://www.resilientlosangeles.com/fund>.

to LA residents impacted by the fires who want to upgrade their homes to the Insurance Institute for Business & Home Safety's Wildfire Prepared Home Plus standard. The most affordable time to invest in resilience is during construction. The Resilient LA Delta Fund offers a model for helping homeowners rebuild resiliently and for providing investors with opportunities to earn returns while reducing future losses, improving insurability and enhancing overall community resilience. As a template, it could be scaled or replicated for future disasters — shifting the paradigm from building back to rebuilding better.

Colorado's Wind and Wildfire Home Protection Mitigation Program: The State of Colorado is partnering with Impact Development Fund, a nonprofit community development financial institution (CDFI), to provide homeowners with grants and forgivable loans up to \$30,000 to harden their homes.⁴² CDFIs are specialized financial institutions — often banks, credit unions, venture capital providers, or other lenders — that pool public and private capital to provide financial products to economically disadvantaged communities. Rather than focusing solely on financial return, CDFIs often measure success by both positive community impact and financial performance, and they offer a promising opportunity to fund home hardening in California.⁴³

RECOMMENDATION 3

With or without cross-jurisdictional entities, all counties and cities facing high fire risk should adopt more progressive wildfire-resilience policies.

Who's responsible: *City and county governments*

Even in the absence of formal cross-jurisdictional or subregional governance structures, individual counties and cities with high fire risk have a critical opportunity — and responsibility — to advance wildfire resilience through local policy leadership. They should adopt and enforce defensible space and Zone Zero standards (in advance of state requirements), integrate wildfire-resistant design into local building codes, and incentivize or require the use of fire-resilient materials in both new construction and retrofits. Local governments should also strengthen land use planning by limiting development in the wildland-urban interface, updating vegetation management ordinances and ensuring that mitigation efforts are equitably implemented across communities. By taking initiative and aligning local policies with on-the-ground contexts and the latest fire-science research, jurisdictions can reduce their exposure to wildfire risk, set models for neighboring regions, and help drive broader regional resilience.

⁴² Epicenter Insights, "Wildfires: Opportunities for the Private Sector," October 22, 2024, <https://www.epicenterinsights.com/wildfires-opportunities-for-the-private-sector/>.

⁴³ California Governor's Office of Emergency Services, "Neighborhood Partnership Housing Services (NPHS): Presentation to the California Wildfire Mitigation and Prevention Authority," August 19, 2025, <https://www.caloes.ca.gov/wp-content/uploads/Recovery/Documents/Neighborhood-Partnership-Housing-Services-NPHS-Presentation-to-CWMPA-8.19.pdf>.

Here are three model ordinances for wildfire resilience:

Defensible space: The Berkeley EMBER Initiative requires properties in the city's high-fire zone to comply with the Zone Zero standard, creating a five-foot ember-resistant zone around buildings. The Moraga-Orinda Fire District adopted a Zone Zero ordinance, effective January 1, 2026. However, public pushback limited the regulation to requiring the removal of all combustible material two feet, rather than five feet, from structures.⁴⁴

Building retrofits: In 2022, the San Rafael City Council's San Rafael Replacement of Wood Roofing Ordinance required the replacement of existing wood and shake roofs by 2027. This building code amendment is part of the San Rafael Wildfire Prevention and Protection Action Plan, which was adopted in August 2020.

Building code updates: Four years after the 2018 Camp Fire, the Town of Paradise updated its building ordinances to require that all new homes be built to the Insurance Institute for Business & Home Safety's Wildfire Prepared Home standard. This move has already helped incentivize one insurance company, Mercury Insurance, to return to the area.

RECOMMENDATION 4

The California Department of Insurance should require insurance companies to recognize and participate in community-scale mitigation initiatives.

Who's responsible: *California Department of Insurance and state policymakers*

To date, insurers often operate independently of wildfire mitigation programs. Publicly available hazard maps provide valuable context to insurers, but they are infrequently updated and lack parcel- and community-level data on mitigation actions, such as improvements in building materials and defensible space. The lack of insurance market and public sector coordination and data sharing means public agencies struggle to prioritize mitigation efforts, and insurance companies cannot see completed mitigation efforts and reflect them in risk assessments and underwriting. To date, California has no comprehensive reporting system for prescribed fires, fuel breaks, vegetation management, or community hardening.

Under a 2022 California Department of Insurance rule, California's insurers must offer discounts for mitigation actions, but the discounts are often minimal, inconsistent among insurers, and highly variable, depending on spacing between homes, number of mitigation measures taken, and wildfire-specific claims data used by insurers to inform the discounts.⁴⁵ Moreover, the rule does

⁴⁴ Moraga-Orinda Fire District, "Exterior Wildfire Hazard Abatement Requirements," <https://www.mofd.org/our-district/fuels-mitigation-fire-prevention/abatement-requirements-english>.

⁴⁵ Moraga-Orinda Fire District, "Exterior Wildfire Hazard Abatement Requirements."

not require insurers to take mitigation actions into account when underwriting policies or deciding where to insure in the first place. Colorado recently passed a landmark piece of legislation, House Bill 1182, requiring insurers to account for households' climate resilience and wildfire mitigation efforts in underwriting and pricing models.⁴⁶ A similar measure, Senate Bill 1060 (Becker), failed in the California legislature in 2024.⁴⁷

The relationship among the Department of Insurance, state agencies such as CAL FIRE, local fire authorities, and insurance companies is pivotal to restoring and maintaining insurability across the state. SPUR supports two actions to strengthen coordination with insurance providers.

The Department of Insurance should empower the Insurance Institute for Business & Home Safety (IBHS) to facilitate structured avenues for collaboration between insurers and local fire mitigation agencies. These avenues could include state-facilitated wildfire risk councils or pilot programs wherein insurers co-fund mitigation in high-risk regions.

Achieving community-scale resilience will require alignment and buy-in across sectors to encourage a transition away from business-as-usual home building and wildfire response. To strengthen alignment between on-the-ground mitigation and insurance incentives, the Department of Insurance should enable IBHS to lead structured partnerships of insurers and local fire agencies. IBHS sets many of the standards for wildfire resilience and insurability. It is well-positioned to help local jurisdictions and insurance companies create a shared strategy for reducing risk and improving insurability for both existing buildings and new construction.

Wildfire Prepared Home, an IBHS program, allows homeowners in California, Oregon, Nevada, and New Mexico to earn this designation by building or taking evidence-based actions to harden three vulnerable areas of the home: the roof, specific building features, and defensible space. Insurers, including the California Fair Plan, CSAA, State Farm, Liberty Mutual, Nationwide, Travelers, and Mercury Insurance, are starting to reward property owners who have acquired this designation by upgrading existing homes. Insurance for Good's research based on rate filings in October 2025 found that insurers are more willing to write policies in high-risk areas and offer the largest discounts for properties that meet the IBHS Wildfire Prepared Home Plus standard.⁴⁸ In January 2025, Mercury Insurance began offering policies to homeowners in the Town of Paradise after it required new homes to be built to the Wildfire Prepared Home standard. That made Mercury the first major insurance company to offer home insurance there since the 2018 fires.⁴⁹ The Wildfire Prepared Neighborhood IBHS designation is like the Wildfire Prepared Home standard, but for new communities that achieve standards for fire-resistant construction, fuel break management, and defensible space. The first of these neighborhoods is under development in Escondido, California,

⁴⁶ Colorado General Assembly, "HB25-1182: Risk Model Use in Property Insurance Policies," <https://leg.colorado.gov/bills/hb25-1182>.

⁴⁷ Stephanie Sierra, "California Senators Who Voted Against Bills to Lower Wildfire Insurance Costs Received More Than \$4M from Insurance Industries," ABC7 News, September 17, 2024, <https://abc7news.com/post/california-senators-voted-bills-lower-wildfire-insurance-costs-received-more-millions-dollars-industries/15311884/>.

⁴⁸ Carolyn Kousky and Xuesong You, "Do California Insurers Reward Wildfire Resilience?," November 4, 2025, Insurance for Good, <https://www.insuranceforgood.org/blog/do-ca-insurers-reward-wildfire-resilience>.

⁴⁹ Mercury Insurance, "Mercury Becomes First Major Insurance Company to Return to Paradise California as City's Rebuilding Efforts Gain Momentum," *PR Newswire*, January 7, 2025, <https://www.prnewswire.com/news-releases/mercury-becomes-first-major-insurance-company-to-return-to-paradise-california-as-citys-rebuilding-efforts-gain-momentum-302344340.html>.

and offers a model for resilient urban planning.⁵⁰ A proposed development in Novato is also seeking this designation, promoting risk reduction and insurability in a region surrounded by open space and nature preserves.

By fostering transparent, reciprocal relationships between government agencies and insurers, California can bridge the gap between regulatory oversight and on-the-ground mitigation. Doing so will help stabilize insurance markets, improve public trust, and align economic incentives with shared outcomes.

The Department of Insurance should invest in and support the data-collection and data-sharing tools needed to highlight community-scale investments and their impacts on wildfire risk reduction. The WUI Data Commons is one innovative approach to data collection.

While some structure-level data exist, parcel- and community-scale mitigation information is sparse, inconsistent, and rarely shared among insurers.⁵¹ The WUI (wildland-urban interface) Data Commons is a public-private initiative led by Milliman, Inc. in partnership with the IBHS. It aims to transform how wildfire mitigation data are collected and used. By sharing parcel- and community-level information on defensible space efforts, fuel breaks, and home hardening on a secure platform, the WUI Data Commons will support insurers, local fire professionals, and homeowners alike. Insurance companies will be able to use the data to refine underwriting and pricing, and fire professionals can use it for risk reduction planning and public education. The platform will initially be available to CAL FIRE units and county fire chiefs in areas where vegetation management data are already collected, such as in Marin County. Controlled access to the platform protects homeowner privacy, and homeowners can choose to opt in to sharing data with IBHS. The WUI Data Commons will be made available to 30 to 50 communities in as many as seven states to test for privacy, ownership, and antitrust issues. Ultimately, it seeks to create a lasting public-private partnership that aligns mitigation standards, informs insurance policy, and empowers communities to take coordinated, data-driven action to improve wildfire resilience and insurability.

⁵⁰ Insurance Institute for Business & Home Safety, “KB Home Introduces Wildfire-Resilient Neighborhood,” March 27, 2025, <https://ibhs.org/ibhs-news-releases/kb-home-introduces-wildfire-resilient-neighborhood/>.

⁵¹ Milliman, Inc., *WUI Data Commons Phase 1: Stakeholder Interview Summary*, prepared for Insurance Institute for Business & Home Safety, March 31, 2024, https://edge.sitecorecloud.io/millimaninc5660-milliman6442-prod27d5-0001/media/Milliman/PDFs/2024-Articles/7-24-24_IBHS-Phase-1-Report.pdf.

Conclusion

The LA fires revealed an inflection point in California's insurance market and in residents' ability to recover from climate change and natural disasters — one that will require creative policy changes and financing tools, as well as a shift from individual risk mitigation to true community-scale resilience. Wildfire resilience is a collective action problem like nothing California has faced before. Neighborhoods and communities must put aside politics, privacy hedges, and embedded architectural and landscape design preferences, while government, philanthropy, and the private sector must provide enormous financial support to retrofit and build homes to wildfire-resilience standards at scale. At the same time, local governments must implement widespread vegetation management plans to reduce wildfire risk and preserve the Bay Area's parks and wildlands.

It is difficult to foster the social and political will to implement long-term hazard mitigation strategies, but public will to address wildfire risk has grown significantly in the last five years in the wake of devastating fires across the state. As climate change exacerbates wildfire, flood, heat, and sea level rise risks in California and shifts the geographic boundaries of the hazards we currently experience, the time is now to advance strong cross-jurisdictional governance models and leverage innovative public and private financing tools. The financing tools outlined in this report, originally designed for forest health and wildfire mitigation, can also be adapted for the Bay Area's sea level rise adaptation needs where long-term, upfront investment is equally essential. Multi-hazard resilience districts, for example, can raise revenue over a larger geography and increase the pool of taxpayers and stakeholders contributing funding for investments in mitigation and response.

Just as communities in fire-prone areas will have to invest in forest health, non-combustible building materials and fire-resistant landscaping, communities along the coast will invest in building seawalls, elevating foundations, and upgrading stormwater infrastructure. California's climate threats and adaptation costs have revealed interdependencies across jurisdictions, infrastructure, economic sectors, and communities. Our governance and financing solutions must reflect this reality.

Appendix A: Key Federal, State, and Local Agencies Involved in Wildfire Mitigation and Prevention

ENTITY	PRIMARY RESPONSIBILITIES
Federal	
U.S. Forest Service	Owns and manages about 15.5 million acres of forestland in California, including 18 national forests. Oversees activities related to forestry research, resource development, land conservation, and recreation.
Bureau of Land Management	Owns and manages about 1.6 million acres of forestland in California, including overseeing activities related to resource development, land conservation, and recreation.
National Park Service	Owns and manages about 1.4 million acres of forestland in California, including preserving natural and cultural resources and facilitating public access.
Federal Emergency Management Agency (FEMA)	Administers various programs that provide grants to states for actions to reduce the impacts of future disasters, including the Hazard Mitigation Assistance program and the Building Resilient Infrastructure and Communities program.
State	
Department of Forestry and Fire Protection (CAL FIRE)	Administers forest health and fire prevention programs. Staffs hand crews that conduct fire suppression, vegetation management, and hazardous fuel reduction projects. Enforces defensible space requirements in the State Responsibility Area, which includes more than 31 million acres of mostly privately owned forestlands. Oversees enforcement of state timber-harvesting policies on private lands. Manages 71,000 acres of state research forests and conducts forestry research.
Conservation Corps, Military Department, and Department of Corrections and Rehabilitation	Staffs hand crews that conduct fire suppression, vegetation management, and hazardous fuel reduction projects.
Board of Forestry and Fire Protection	Serves as regulatory arm of CAL FIRE. Develops state's forest policies and regulations.
Natural Resources Agency	Oversees the Timber Regulation and Forest Restoration Program and helps coordinate statewide forest policies and programs.
State Conservancies	Allocate funding, generally through grants to other entities, for wildfire resilience projects.
State Parks and Department of Fish and Wildlife	Conduct wildfire resilience activities on state-owned lands.
Department of Conservation	Administers the Regional Forest and Fire Capacity Program to support regional collaboration on forest health and wildfire resilience activities.
Wildfire and Forest Resilience Task Force	Develops research, recommendations, and plans for improving the state's wildfire resilience.
Governor's Office of Emergency Services	Administers and allocates federal FEMA funding to communities for disaster mitigation activities.

ENTITY	PRIMARY RESPONSIBILITIES
Office of Energy Infrastructure Safety (OEIS)	Primary state agency responsible for reducing the likelihood of utility-involved wildfires. Approves utilities' wildfire risk mitigation plans.
Public Utilities Commission	Regulates investor-owned electric utilities, ratifies the utility wildfire risk mitigation plans approved by OEIS, and oversees the use of public safety power shutoffs.
Other	
Local government agencies	Operate planning departments that make land use and zoning decisions related to development in the wildland urban interface. Enforce local and state defensible space requirements as applicable. Operate various programs to reduce wildfire risk, such as by providing financial or in-kind support for defensible space and fuel reduction projects.
Private property owners	Meet applicable state and local requirements regarding defensible space and timber harvesting. (State defensible space requirements generally apply to residents in state responsibility areas and regions designated as very high fire hazard severity zones.)
Electric utilities	Manage electrical infrastructure such as powerlines and undertake various actions to reduce risks of wildfires started by their equipment.
Local Fire Safe councils (typically nongovernmental organizations)	Educate local communities about wildfire.

Source: Legislative Analyst's Office, *Frequently Asked Questions About Wildfires in California*, January 28, 2025, updated February 13, 2025, <https://lao.ca.gov/Publications/Report/4952>.

Appendix B: Local Fire Agencies by County

COUNTY	NAME OF FIRE DEPT (FD) OR FIRE PROTECTION DISTRICT (FPD)	CITY (OR OTHER)
Alameda	Alameda FD	Alameda
Alameda	Alameda County FD	Dublin
Alameda	City Of Albany FD	Albany
Alameda	Berkeley FD	Berkeley
Alameda	Fremont FD	Fremont
Alameda	Hayward FD; Fairview FPD	Hayward
Alameda	Livermore- Pleasanton FD	Pleasanton
Alameda	Oakland FD	Oakland
Alameda	Piedmont FD	Piedmont
Alameda	Camp Parks FD	Federal: Parks Reserve Forces Training Area, a United States Army Reserve near the City of Dublin
Contra Costa	Kensington FPD	Kensington (unincorporated area)
Contra Costa	Crockett Carquinez FPD	Crockett (unincorporated area)
Contra Costa	San Ramon Valley FPD	San Ramon
Contra Costa	El Cerrito FD	El Cerrito
Contra Costa	Moraga Orinda FPD	Moraga
Contra Costa	Contra Costa Co FPD	Concord
Contra Costa	Richmond FD	Richmond
Contra Costa	Rodeo Hercules FD	Hercules
Marin	Inverness Volunteer FD	Inverness (unincorporated area)
Marin	Central Marin Fire Authority	Corte Madera
Marin	Ross Valley FD	San Anselmo
Marin	San Rafael FD	San Rafael
Marin	Marinwood FD	San Rafael
Marin	Marin County FD	Woodacre (unincorporated area)
Marin	Stinson Beach FPD	Stinson Beach



Marin	Bolinas FPD	Bolinas (unincorporated area)
Marin	Kentfield FPD	Kentfield
Marin	Southern Marin FPD	Mill Valley
Marin	Tiburon FPD	Tiburon
Marin	Novato FPD	Novato
Napa	Calistoga FD	Calistoga
Napa	St Helena FD	St Helena
Napa	American Canyon FPD	American Canyon
Napa	Napa CFD	St Helena
Napa	City Of Napa FD	Napa
San Francisco	San Francisco FD	San Francisco
San Mateo	Colma FPD	Colma
San Mateo	Coastside Fire District	Felton
San Mateo	Menlo Park FPD	Menlo Park
San Mateo	Redwood City FD	Redwood City
San Mateo	San Bruno FD	San Bruno
San Mateo	South San Francisco FD	South San Francisco
San Mateo	San Mateo Consolidated FD	Foster City
San Mateo	Woodside FPD	Woodside
San Mateo	San Mateo Co FD	Felton
San Mateo	North Co Fire Authority	Daly City
San Mateo	Central County FD	Burlingame
Santa Clara	Gilroy FD	Gilroy
Santa Clara	Milpitas FD	Milpitas
Santa Clara	Morgan Hill FD, South Santa Clara CFPD, CDF-Santa Clara County	Morgan Hill
Santa Clara	Mountain View FD	Mountain View
Santa Clara	Palo Alto FD	Palo Alto
Santa Clara	San Jose FD	San Jose



Santa Clara	Santa Clara County FD	Campbell
Santa Clara	Santa Clara FD	Santa Clara
Santa Clara	Sunnyvale Department of Public Safety	Sunnyvale
Santa Clara	NASA Ames Research Center FD	Federal: Moffett, Moffett Federal Airfield, Moffett Field, NASA Ames Research Center & Whisman
Sonoma	Cazadero CSD	Cazadero (unincorporated area)
Sonoma	Cloverdale FD	Cloverdale
Sonoma	Dry Creek Rancheria FD, Northern Sonoma County FPD	Geyserville
Sonoma	Gold Ridge FPD	Sebastopol
Sonoma	Graton FPD	Graton
Sonoma	Healdsburg FD	Healdsburg
Sonoma	Kenwood FPD	Kenwood (unincorporated area)
Sonoma	Monte Rio FPD	Monte Rio (unincorporated area)
Sonoma	North Sonoma Coast FPD	Sea Ranch (unincorporated area)
Sonoma	Occidental CSD	Occidental
Sonoma	Rancho Adobe FPD	Penngrove
Sonoma	Petaluma FD	Petaluma
Sonoma	Rohnert Park DPS	Rohnert Park
Sonoma	Santa Rosa FD	Santa Rosa
Sonoma	City of Sebastopol FD	Sebastopol
Sonoma	Sonoma Valley Fire District	Sonoma
Sonoma	Sonoma County Fire District	Windsor
Sonoma	Schell Vista FPD	Sonoma
Sonoma	Timber Cove FPD	Cazadero (unincorporated area)
Sonoma	Eldridge FD	Eldridge
Sonoma	USCG Training Center Petaluma FD	Federal: USCG Training Center Petaluma

Source: SPUR analysis of CAL FIRE maps: "California_Local_Fire_Districts (FeatureServer)," ArcGIS Map, August 2025, https://services1.arcgis.com/iUJYIo9tSA7EHvFZ/arcgis/rest/services/California_Local_Fire_Districts/FeatureServer.



Appendix C: Sample of State Bills in the 2024–2025 Legislative Session Related to Wildfires

LEGISLATION	SUMMARY	SIGNED BY THE GOVERNOR?
AB 1 (Connolly)	Requires the Department of Insurance to regularly update the Safer from Wildfires regulations with lists of building- and community-level fire hardening measures that insurance companies will have to consider when offering premium discounts	Yes
AB 130 (Gabriel)	Creates a list of exemptions from the California Environmental Quality Act and pauses changes to state and local building codes until 2031 (exception for home hardening for wildfire resilience only; does not exempt defensible space)	Yes
AB 888 (Calderon)	The Safer Homes Act creates the California Safe Homes grant program to provide grants to low-income homeowners to replace their roofs with fire-safe roofs and to fund defensible space vegetation clearing projects; received a \$3 million budget allocation in 2025.	Yes
SB 547 (Perez)	Prohibits insurers from canceling or refusing to renew a commercial property insurance policy for one year from the declaration of a state of emergency, if the commercial property is located within the perimeter of a wildfire or in an adjacent zip code.	Yes
SB 429 (Cortese)	Establishes the Wildfire Safety and Risk Mitigation Program at the Department of Insurance. The program provides funding to universities to create a research educational center responsible for developing, demonstrating, and deploying a public wildfire catastrophe model that aligns federal/state/local wildfire risk reduction efforts	Yes
AB 226 (Calderon and Alvarez)	The FAIR Plan Stabilization Act increases the financial tools available to offset the increase in exposure the FAIR Plan is taking on by insuring properties in high-risk areas that other insurers do not want to hold	Yes
SB 782 (Pérez)	Authorizes cities and counties to create “disaster recovery financing districts,” thereby allowing local governments to raise and reinvest revenue directly in impacted neighborhoods	Yes
AB 1143 (Bennett)	Would have created a home hardening certification program, supporting residents in implementing the most effective home hardening measures during renovation	No
SB 326 (Becker)	This home hardening certification program would have established a wildfire risk mitigation planning framework, sped up the adoption of Zone Zero standards for certain properties, and provided state funding to counties to support implementation	No
SB 269 (Choi)	Would have created tax credits for homeowners who undertake home hardening or vegetation management	No; held in suspense



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