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Testimony of Robert Gordon, Senior Vice President of the American Property Casualty Insurance Association (APCIA)

To The U.S. Senate Agriculture, Nutrition, & Forestry Subcommittee on Conservation, Forestry, Natural Resources, and Biotechnology

Legislative Hearing to Review H.R. 471, The Fix Our Forests Act, and Options to Reduce Catastrophic Wildfire

March 6, 2025

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Chairman Marshall and Ranking Member Bennet, thank you for holding today's hearing to examine the Fix Our Forests Act, H.R. 471, introduced by House Natural Resources Committee Chairman Bruce Westerman (R-AR) and Rep. Scott Peters (D-CA). This legislation passed the House in January with bipartisan support (279-141), in the wake of the devastating Los Angeles fires. Wildfire events impacting communities have grown in severity and number over the past several years, and this hearing provides an opportunity to hear directly from various perspectives on ways to reduce the risk of catastrophic wildfires in the U.S.

The American Property Casualty Insurance Association (APCIA) strongly supports the Fix Our Forests Act and encouraged its passage in the House. Several of the provisions in the bill reflect the findings and recommendations of the Wildland Fire Mitigation and Management Commission (Commission). The Commission's final report to Congress includes 148 consensus-based recommendations, which highlight the critical need to improve federal policies at every stage of the wildfire cycle—before, during, and after fire. Their purpose is to reduce the risk of catastrophic wildfires and the harmful impacts on communities and the environment.

I would also like to share my perspective, on behalf of APCIA, as our President and CEO, David Sampson, served as a member of the Commission, occupying the property development industry seat. I serve as Senior Vice President in the Policy, Research and International Division of the APCIA, which represents 67 percent of the U.S. property casualty insurance market.[1]

1 APCIA represents the broadest cross-section of home, auto, and business insurers of any national trade association. APCIA members represent all sizes, structures, and regions, protecting families, communities, and businesses in the U.S. and across the globe.

Property casualty insurers have long been engaged in efforts to prevent and reduce devastation from natural catastrophes, including wildfires. Further, property casualty insurers are on the frontlines working to help individuals, families, homeowners, businesses, and governments identify and reduce their wildfire risk, promote preparedness, and assist in post-disaster recovery. Following are key principles for promoting greater resilience:

- *Risk Identification* - To effectively mitigate the physical and financial threats individuals and communities face from natural disasters, insurers believe the ability to identify and communicate risk is critical and requires an increased investment in advanced data, tools, and technologies to help understand and prepare for the rising physical threats that climate change and natural disasters may pose.
- *Preparedness and Response* - To promote greater resilience, insurers believe adaptation is critical and will require enhanced coordination and alignment of resources between federal, state and local governments to help educate, facilitate and support community preparedness and response.
- *Recovery* - To recover from catastrophic loss events fully and most effectively, insurers believe improved financial tools and resources must be made available to families and businesses to help manage the financial costs when disaster strikes, while also promoting enhanced resilience to future risks.

The insurance industry has supported the creation and ongoing funding of research-focused organizations like the Insurance Institute for Business & Home Safety (IBHS). IBHS is a leader in the development of evidence-based solutions to effectively reduce wildfire risk and other harm to communities, including its Wildfire Prepared Home program.[2] This voluntary designation program, launched in California, allows homeowners to take preventative steps to mitigate wildfire risk for their home and yard.

> ***... many regions in the U.S. are experiencing evolving man-made and natural environmental conditions that are making them more prone to burn.***

While there are many natural causes of wildfires, such as lightning strikes, humans caused 87 percent of wildfire ignitions in the U.S. over the last decade as more people live and recreate in areas prone to wildfires.[3] Increasingly, many regions in the U.S. are experiencing evolving man-made and natural environmental conditions that are making them more prone to burn. For example, federal and state policies that have led to the buildup of hazardous fuels further contribute to increased wildfire risk, while local land use policies have allowed substantial community development and population migration in the wildland urban interface (WUI) – an area where the built environment meets or intermingles with nature. The collective impacts of such policies have put a growing number of communities directly in harm's way.[4]

2 **https://wildfireprepared.org/**.
3 **https://www.nifc.gov/fire-information/fire-prevention-education-mitigation/wildfire-investigation**.
4 Increasing Wildfire Risk in the Wild, Wild West (Nov 2022) at **https://www.apci.org/attachment/static/7103/**.

Housing growth in the WUI has exploded in recent decades with local land use policies allowing more homes and communities to be built in areas at high risk for disasters. According to Cape Analytics and HazardHub, from 2011-2020, 22,382 new homes were built in zones at 'high' risk of wildfire.

FIGURE 1

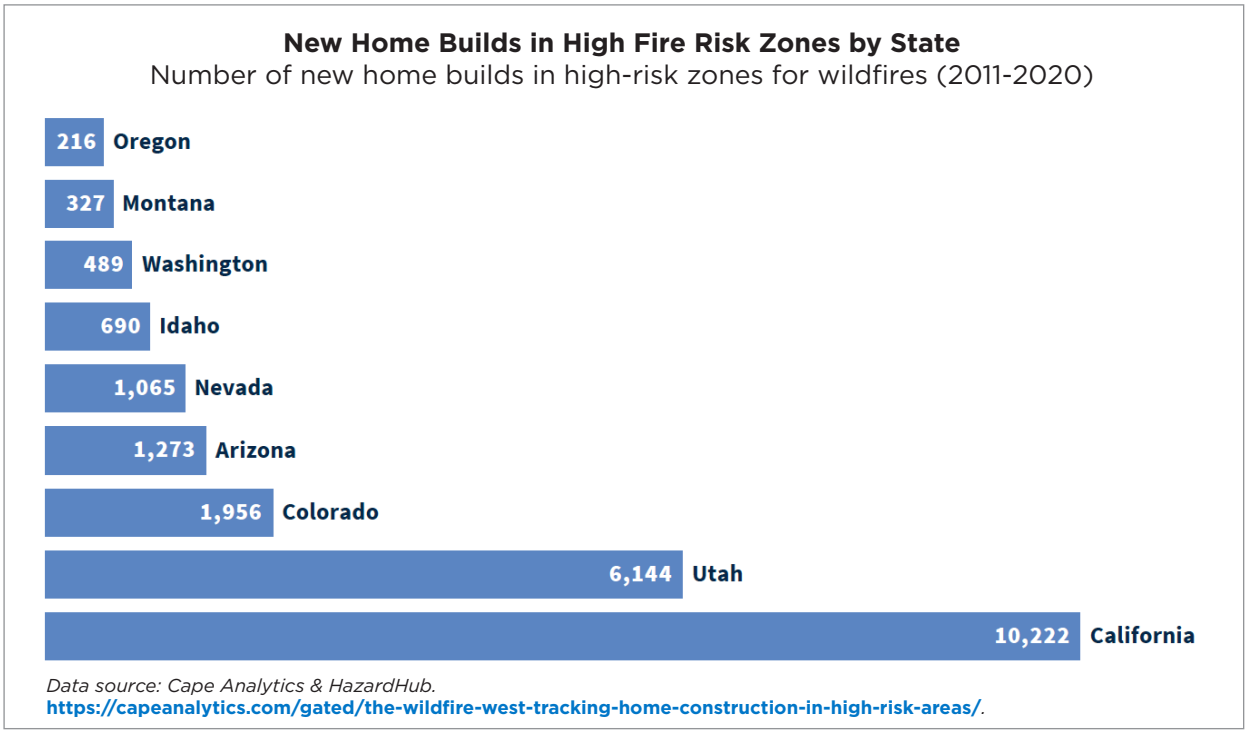
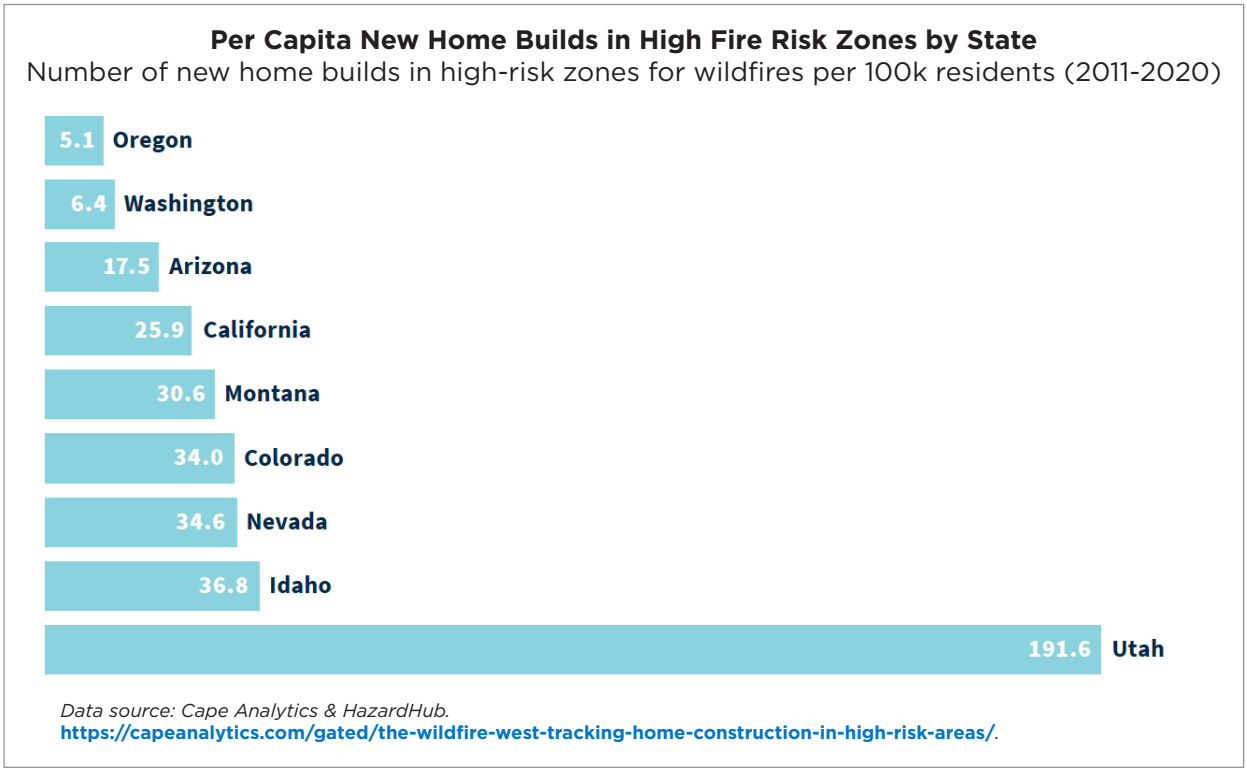
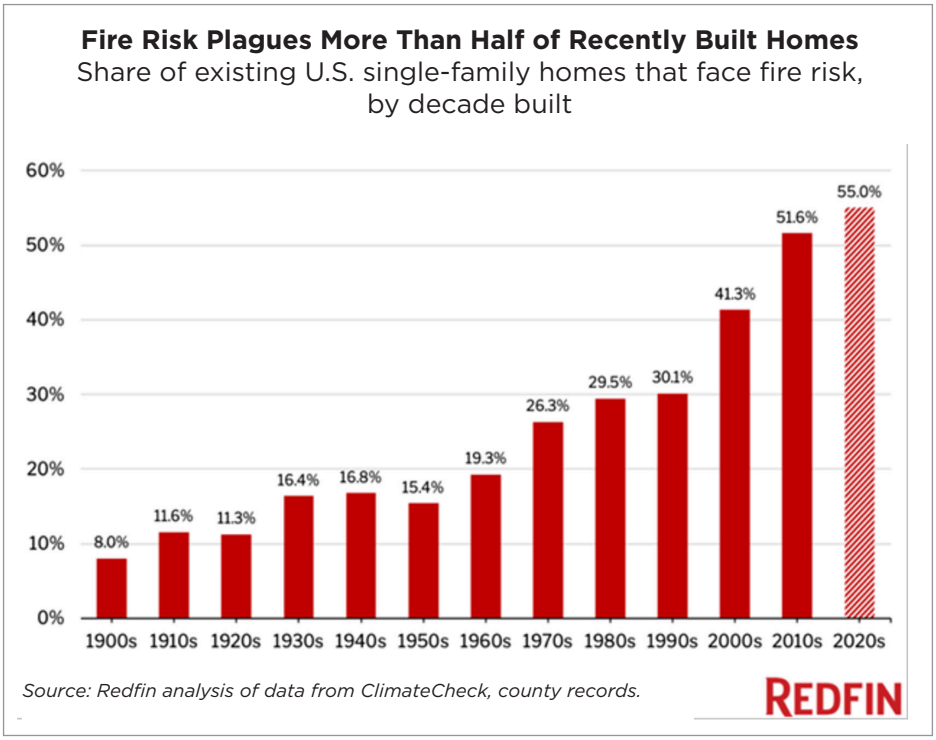


FIGURE 2



REDFIN has noted that 55.0% of single-family homes built in the 2020s face fire risk. While these land use policies may be well-intentioned, their collective impacts have contributed to massive concentrations of risk that need to be mitigated.

FIGURE 3



Separately, the intensifying impacts from climate change and drought are enabling fires to ignite more easily and spread more rapidly, resulting in more catastrophic losses as ember storms consume entire communities in mere hours. Wildfire seasons are longer and more intense, particularly in the West. Many parts of the East, which have nearly 28 million homes located in zones prone to burn, have seen smaller but impactful increases in fire weather putting more people at risk.[5]

> ***The effects of warmer and drier conditions are resulting in increased fire risk.***

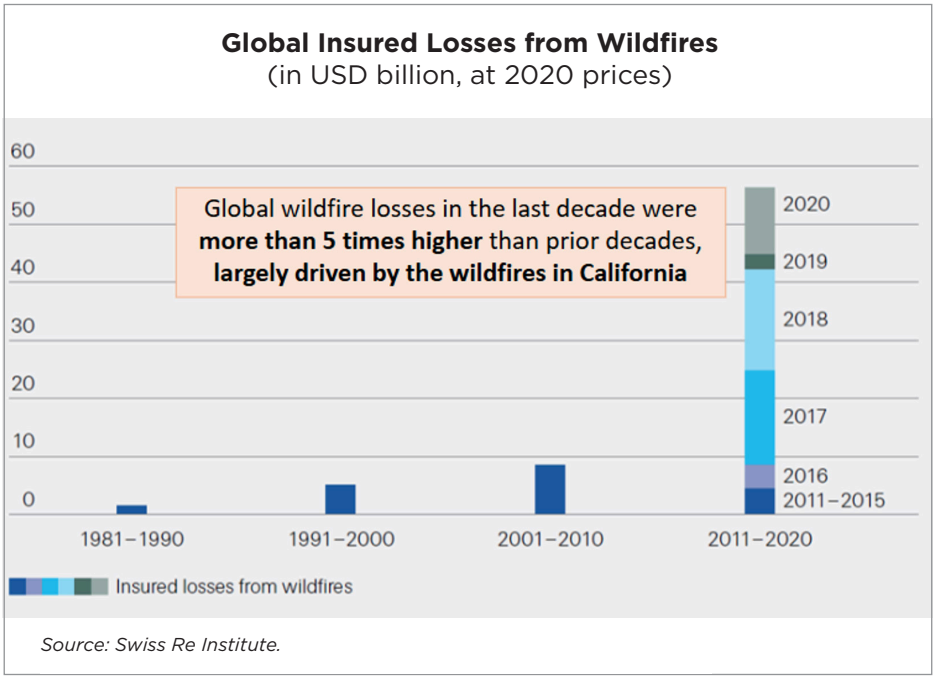
Additionally, evolving climate conditions are enabling fires to burn at higher altitudes. In a study entitled 'Warming enabled upslope advance in western US forest fires', published in Proceedings of the National Academy of Sciences in June 2021, researchers found climate warming has diminished the 'high-elevation flammability barrier' — the point where forests historically were too wet to burn regularly because of the lingering presence of snow. They further noted, over three decades (1984-2017) fires have advanced 252 meters uphill in Western mountains, or roughly 800 feet in elevation, amongst other findings.[6]

5 **https://www.climatecentral.org/climate-matters/fire-weather-2023**.
6 **https://www.mcgill.ca/newsroom/channels/news/mountain-fires-burning-higher-unprecedented-rates-331540**.

This was most recently evidenced in California in 2021 as the Dixie Fire became the largest single wildfire in California history.[7] Conditions also enabled for the first time ever a wildfire to burn from one side of the Sierra Nevada mountains to the other – first through the Dixie fire, which destroyed the Gold Rush-era community of Greenville, only to be repeated one month later after the Caldor fire largely destroyed the mountain hamlet of Grizzly Flats and threatened South Lake Tahoe.[8]

As a result, the U.S. is increasingly experiencing unprecedented economic and insured losses due to wildfire. For example, global insured wildfire losses in the last decade were more than five times higher than prior decades, largely driven by wildfires in California.[9] Since 2017, U.S. insurers have experienced 8 of the top 10 costliest insured wildfires ever, globally.[10]

FIGURE 4



Source: Swiss Re Institute.

In its 2024 National Overview,[11] the National Centers for Environmental Information (NCEI) noted based on preliminary analysis, 2024 ranked as the warmest year in the 130-year record. Nearly the entire contiguous U.S. experienced much-above-average temperatures during 2024, with concentrated areas of record warmth across the Southwest, Deep South, Upper Midwest, Great Lakes and from the central Appalachians to the Northeast. Seventeen states (Texas, Oklahoma, Minnesota, Wisconsin, Michigan, Indiana, Kentucky, Tennessee, Ohio, West Virginia, Virginia, Pennsylvania, Maryland, New York, Vermont, New Hampshire and Maine) had their warmest year on record while all but two remaining states across the Lower-48 ranked as one of the warmest five years on record.

7 The August Complex Fire in 2020 is the largest wildfire in California after multiple fires merged into a single fire, becoming the state's first 'Gigafire' – a single fire resulting in over 1 million acres burned. Only three other Gigafire events have occurred in recent history, including two brush fires in Australia in 2020 that combined to burn 1.5 million acres, the 2004 Taylor Complex fire in Alaska which burned 1.3 million acres, and the 1998 Yellowstone fire in Montana and Idaho which burned 1.58 million acres.

8 **https://www.latimes.com/california/story/2021-12-13/winter-storms-poised-to-end-california-wildfire-season**.

9 Swiss Re Institute.

10 Aon Climate & Catastrophe Insight.

11 **https://www.ncei.noaa.gov/access/monitoring/monthly-report/national/202413**.

Some notable highlights from the 2024 National Overview:

- A total of 1,117 counties across the Lower 48 and Alaska were record warm (35% of counties) while an additional 1,908 counties, including three in Alaska, ranked in the top-10 warmest for the year (61% of counties).
- Within those counties, more than 300 million people experienced a top-10 warm year during 2024 with more than 140 million people impacted by the warmest year on record.
- Annual temperatures across nearly the entire Lower 48 were much-warmer than average to record warm in 2024. Seventeen states from the Upper Midwest to the Mid-Atlantic and into the Northeast as well as in parts of the South had their warmest year on record. All but two remaining states (Washington and Oregon) experienced a top-five warmest January–December.
- Las Vegas, Nevada reported an all-time high temperature record of 120ºF on July 7.
- In Deadhorse, Alaska, the high temperature of 89ºF on August 6 broke the previous all-time record high temperature of 85ºF set in July 2016. This is also the highest temperature on record in Alaska north of 70ºN.
- Phoenix, Arizona reached 110ºF or higher on 70 days during 2024 and recorded its hottest summer and year on record. Phoenix also shattered a record for consecutive days at or above 100ºF with 113 (previous record was 76 days in 1993).

The 2024 National Overview also highlighted concerning drought conditions. According to the U.S. Drought Monitor (USDM), drought coverage across the contiguous U.S. remained significant for the fourth year in a row. The year began with approximately 33 percent of the contiguous U.S. in drought. Drought coverage shrank as the year progressed and reached the minimum extent for the year at 12 percent on June 11—the smallest contiguous U.S. drought footprint since early 2020. As the summer progressed, hot and dry conditions led to the expansion of drought across the Southeast and Mid-Atlantic as well as across the Plains. By October 29, the extent of drought peaked with more than half of the contiguous U.S. (54 percent) in drought, covering significant portions of the Northwest, Southwest, northern and central Rockies, Plains, Great Lakes, the western and central Gulf Coast states as well as the central Appalachians, Mid-Atlantic and portions of the Northeast.

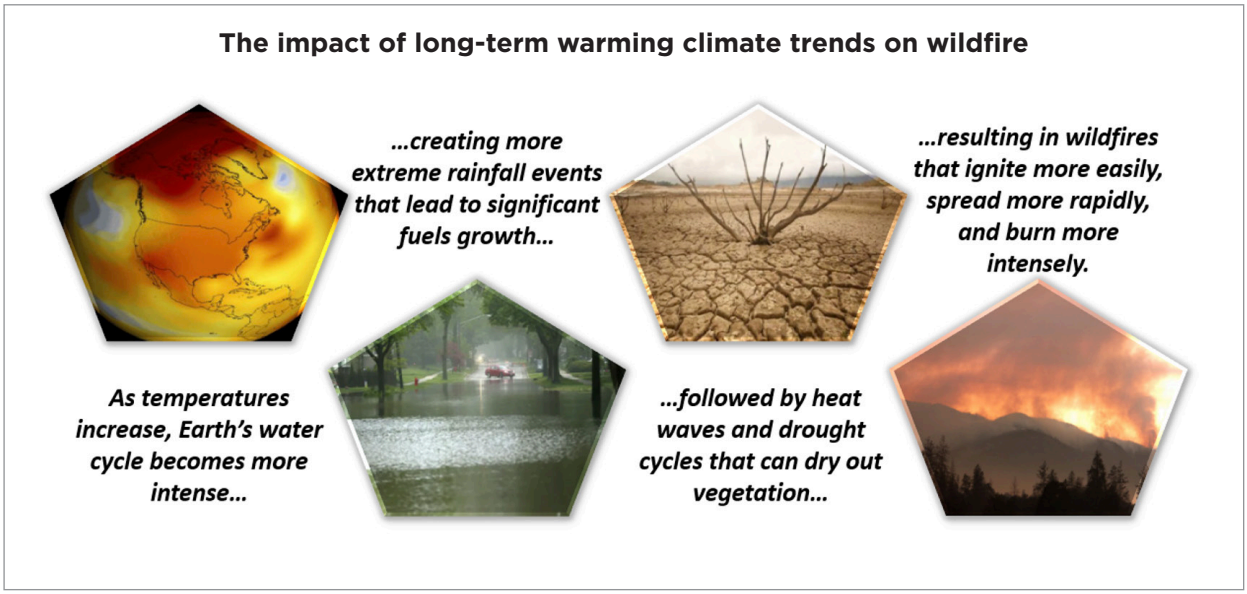
Such abnormally warm and dry conditions have contributed to devastating wildfires in multiple states in recent years. For example, in 2023, wildfires occurred in North Carolina, Tennessee, Georgia,[12] and the tragic fires of Hawaii – states which are not typically accustomed to such events. Further north, record wildfires in Canada resulted in extremely smoky conditions blanketing northeastern states for extended periods, causing air quality to plummet to “very dangerous” or “hazardous” levels for the first time in some regions.[13] In February 2024, following an abnormally warm winter in Texas,[14] dry and windy conditions resulted in the Smokehouse Creek fire, which burned over a million acres becoming Texas’ largest wildfire on record. In January 2025, catastrophic wildfires devastated regions across

12 **https://www.foxweather.com/weather-news/nc-popular-drive-fire-forrest**.
13 **https://www.cnn.com/2023/09/17/us/air-quality-wildfire-pollution-allergy-dg/index.html**.
14 **https://www.texasmonthly.com/news-politics/texas-warm-el-nino-winter/**.

Los Angeles, shattering records to become the costliest insured wildfire loss in history, globally, and the most destructive wildfire in Los Angeles history. The region had experienced extreme swings from wet conditions following two rainy winters that led to widespread flooding and heavy growth of brush, followed by severe drought conditions due to one of the hottest summers on record for the region with no measurable rain for roughly nine months prior to the fires.

Such large swings between extreme heat and precipitation cycles are a hallmark factor of a warming climate. Simply put, this phenomenon that communities are facing will not only continue but further amplify as the Earth further warms, increasing the risk of wildfire in a growing number of states.

FIGURE 5



Wildfire is a natural part of our ecosystem. However, to address these challenges – preventing conflagration-scale losses from devastating communities, natural resources, and ecosystems – the focus must be on the underlying issue - reducing wildfire risk in and around communities. Wildfire research from the Insurance Institute for Business & Home Safety (IBHS) shows homeowners must focus on three vulnerable areas of a home: the roof, specific building features, and defensible space, including a critical 0-5-foot home ignition zone. The primary goal is to break ignition pathways, whether through embers that may land on the home or enter through eaves or vents, as well as vegetation or other combustible materials that ignite and are attached or adjacent to the home. The IBHS notes in its recent report, "The Return of Conflagrations in Our Built Environment", that as the impacts of climate change increase, dense construction, lack of ignition-resistant construction materials, and dense fuels between structures have set the stage for the built environment conflagrations we have seen over the past decade.[15] The tragedy in Hawaii in 2023 demonstrates the dangers of wildfires are not limited to drought-prone western states. The buildup of vegetation around Lahaina, in particular, was a known threat for years and ultimately culminated in a catastrophic fire that spread through the community.

15 **https://ibhs.org/wildfire/returnconflagration/**.

Similarly, the recent Los Angeles fires occurred in areas prone to wildfire. The risk is predictable and widely known, yet policymakers have continued to allow development that puts homes in the path of fires without appropriate mitigation, such as the region burned in the Palisades fire. "In 1955, the Ventu Park wildfire tore through the canyons above Malibu, burning nearly 14,000 acres and eight homes. The same area saw two large fires burn hillsides and homes over the next three years. There were two in the 1970s, one in the '80s and three in the '90s. This century those hills saw the Woolsey fire, one of the most destructive burns in California history. The Franklin fire, which scorched the hills just last month, has now been overshadowed by the firestorm that followed."[16] Of all the structures destroyed by wildfire between 1985 and 2013, more than 80% were in that fire-prone zone.[17]

The science from the IBHS shows that homes can be built to be fire-resistant ...

The science from the IBHS shows that homes can be built to be fire-resistant, through both structural and landscape modifications. Though, these actions must be taken at the scale of entire neighborhoods or communities, not only individual parcels, and vegetation maintenance must become an ongoing priority. Particularly as conflagration-scale loss events occur when the speed of fire spread overwhelms the capacity and response time of our fire suppression resources, limiting ability to extinguish and/or steer the fire away from the community. Whether fires ignite in the natural or built environment, under extreme fire conditions, such as high wind events, only mitigated properties can slow this progression, by eliminating fuel sources and pathways that enable the rapid spread of fire within communities.

FIGURE 6

Chain of Events Under Extreme Fire Conditions

https://ibhs.org/wp-content/uploads/Suburban_Wildfire_Conflagration_WhitePaper.pdf.

16 https://www.kpbs.org/news/environment/2025/01/16/why-california-keeps-putting-homes-where-fires-burn.
17 *Ibid.*

The Commission's final report[18] contains several important takeaways for policymakers. The first is that we must shift our overall approach to wildfires from reactive to proactive, which includes investing in proactive planning, mitigation, risk reduction, and the workforce needed to accomplish these tasks to break the current cycle of increasingly severe wildfire risk, damage, and loss. Another important takeaway, and essential connection for policymakers, is that actions taken to reduce risk "must encompass both the built and natural environment."

To protect communities across the U.S. and prevent conflagration-scale devastation, mitigation in the natural and built environment is critical. A holistic approach is needed to combat this significant long-term challenge.

The Commission report identifies policy recommendations to reduce risk in the natural environment such as removing excess fuel loads and safely restoring beneficial fire to the landscape. It also highlights the need to better manage fine fuels that ignite easily (e.g., grasses and shrubs), such as through expanding the use of grazing and other tools that can play a critical role in reducing fast moving fires. These recommendations are important to restore balance in the natural environment and reduce the risk of catastrophic fires.

Adapting communities to be more resilient to wildfire is also imperative. We must slow the spread of fire and prevent transition from the natural environment into the built environment where conflagration may occur. This is critical to preventing loss of life and property and is also crucial in reducing harmful environmental contaminants. The Commission developed recommendations to drive mitigation within the built environment, including promoting incentives for improvements to land-use planning, building codes, and defensible space. Recommendations also focused on continued investments to support hardening utility infrastructure, which the insurance industry supports as a growing number of utility-involved ignitions across multiple western states during high wind events are resulting in the costliest and deadliest losses in history. If adopted and implemented, these measures can help save lives and protect communities from immediate and long-lasting impacts.

18 **https://www.usda.gov/sites/default/files/documents/wfmmc-final-report-092023-508.pdf**.

The Fix Our Forests Act touches upon several major themes the Commission report identified, such as the need to expand and speed wildfire risk reduction efforts on public lands and built environments, improve delivery of decision support and modelling tools to fire practitioners, and improve post fire recovery. In particular, the Fix Our Forests Act proposes two sections that closely align with two transformational program concepts proposed in the Commission's recommendations:

- **Sec. 201. Community wildfire risk reduction program:** Establishes an interagency program for reducing wildfire risk in the wildland-urban interface and creates a one-stop grant portal for certain wildfire funding sources. The section identifies five core purposes of the program, including advancing research and science, supporting local adoption of code and standards, supporting local efforts to address wildfire impacts including property damage as well as air and water quality, encouraging public-private partnerships for fuel reduction, and providing technical and financial assistance to communities. It also requires the USDA, DOI, and FEMA to create a unified, simpler, and less complex application and portal for community applications for financial or technical assistance. This would effectively combine the application process for many of the current community-based wildfire grant programs.

  Commission members recognized that federal efforts and agencies focused on wildfire are currently very fragmented, which in turn has also made it very difficult for states and communities to navigate and access federal resources. To more proactively and comprehensively address wildfire risk reduction in the built environment, the first recommendation within the report is to establish a Community Wildfire Risk Reduction program. In establishing a federal interagency partnership between the principal agencies listed, this could help transform these fragmented efforts by creating a more integrated, effective, and science-based approach. These principal agencies would then coordinate and align with state agencies, local departments and tribes for various aspects of the program.
- **Sec. 102. Fireshed Center:** Establishes an interagency center to aggregate data around wildfire management and to provide cross-government coordination related to wildfire decision support. The center would focus on assessment and prediction of fire in both the built and natural environment, reduce fragmentation across federal land management agencies, promote coordination and data sharing, streamline procurement processes, provide publicly accessible information to support planning for both fire response and recovery, and disseminate data tools.

  A significant challenge the Commission identified was the need for greater integration of modern science and technology, to help inform real-time decisions. Federal agencies currently have various predictive services and decision support functions, but they have limited interoperability and dissipated priority-setting and purchasing power. Thus, the Commission recommended establishing a 'Fire Environment Center' to facilitate increased integration of data and tools.

Selected additional Fix Our Forests Act provisions APCIA supports:

- **Sec 106. Emergency Fireshed Management:** Directs the Secretary of Agriculture to carry out fireshed management projects and activities which include hazardous fuel management, fuel break creation, hazard tree removal, routine maintenance, vegetation management or operations and maintenance plan, stand density reduction, chemical treatments, and any activity recommended in a state-specific fireshed assessment or community wildfire protection plan. Allows use of categorical exclusions (CEs) for areas suitable for timber production, as identified in a forest plan or where not otherwise prohibited. This section also expands existing Health Forest Restoration Act (HFRA) categorical exclusions from, generally, 3,000 acres to 10,000 acres. The Secretary of Agriculture is also directed to use additional authorities, such as good neighbor agreements, stewardship contracting, self-determination contracts, and agreements under the Tribal Forest Protection Act to the maximum extent possible.

- **Sec. 117. Utilizing livestock grazing for wildfire risk reduction, including fuels reduction and postfire recovery:** The bill provides direction to the agencies to develop a strategy for the increased use of targeted grazing, including for the purpose of reducing invasive annual grasses. This is strongly aligned with the Commission's recommendation that federal agencies should expand the use of existing authorities and develop new, nimble ways to apply targeted, off-season grazing to treat invasive annual grasses on landscapes to reduce the role these invasives play in the uncharacteristic frequency and severity of wildfire, thus helping to restore ecosystem function.
- **Sec. 202. Community wildfire defense research program:** Expands the Joint Fire Science Program by adding a research program focused on testing and advancing innovative designs to create or improve wildfire-resistant structures and communities and establishes a competition for innovative designs in the creation of ignition resistant structures and fire adapted communities. Also creates an innovation prize for such research. The program sunsets after seven years. The Commission encouraged rewarding innovation in the fields of affordable building material design, subdivision design, landscape architecture, and safe and sustainable building practices to create more ignition-resistant structures and communities.
- **Sec. 203. Vegetation management, facility inspection, and operation and maintenance relating to electric transmission and distribution facility rights-of-way:** Expands the ability of utilities to remove "hazard trees" from 10 feet to those within 150 feet of their power lines and rights of way. The Commission recommended that Congress should direct agencies to support implementation of consistent rules and processes for federal rights-of-way and develop a guide for states to adopt similar rules and processes.
- **Sec. 204. Categorical exclusion for electric utility lines rights-of-way:** Establishes a categorical exclusion for vegetation management, facility inspection and operation and maintenance plans and related activities. (Excludes wilderness areas or areas where Congress has previously restricted or prohibited vegetation removal.)
- **Sec. 205. Seeds of Success:** Directs DOI, USDA, and DOD to develop and implement a joint strategy to facilitate sustained interagency coordination and a comprehensive approach to native plant materials development and restoration, such as promoting the re-seeding of native or fire-resistant grasses post-wildfire, particularly in the wildland-urban interface. The Commission recognized the need to support development of seed capacity and called for additional investment in seed collection, processing and storage, investment in reforestation and revegetation implementation.
- **Sec. 206. Program to support priority reforestation and restoration projects of Department of the Interior:** Requires DOI to identify lands that require reforestation and areas unlikely to experience natural regeneration of forests and report back to Congress on an annual basis on progress addressing these issues. DOI is tasked with coordinating with state, local, and Tribal governments, as well as universities, other federal agencies, and other stakeholders in the process. The provision sunsets in seven years.
- **Sec. 207. Fire department repayment:** Requires USDA and DOI to establish standard operating procedures for timely reimbursement of local fire departments when they are utilized by federal agencies for wildfire response. The Commission found that the slow reimbursement process for local fire departments, and uncertainty of allowable expenses created hardships for local departments and decreased their willingness to lend resources to fire incidents.

- **Sec. 301. Biochar innovations and opportunities for conservation, health, and advancements in research:** Establishes biochar demonstration partnership program to support development and commercialization of biochar. To the extent practicable, biochar demonstration projects are to use at least 50% of their feedstock from forest thinning and management activities conducted on Forest Service or Bureau of Land Management managed lands. The Commission called for an expansion of research and funding for pilot projects for biomass utilization with the hope that further commercialization of biomass products would help defray the expenses of mechanical risk reduction projects, and recommended incentivizing the adoption of new technologies by the private sector to produce value added, and demand-driven innovative wood products.
- **Sec. 302. Accurate Hazardous Fuels Reduction Reports:** Requires annual reporting, available to the public, of hazardous fuel treatment acres on federal land with materials. In determining the number of acres, the Departments of Agriculture and the Interior are prohibited from counting multiple treatment practices as multiple acres and instead are directed to count each acre only once. Activities and cost per acre, as well as the degree of wildfire risk reduction, must also be reported.

  The Commission recommended changes to reporting, and noted success should be measured by outcomes such as the number of protected assets, values, and resources, and the degree to which forests and rangeland are returned to and maintained in a more resilient state.
- **Sec. 303. Public-private wildfire technology deployment and demonstration partnership:** Creates a public-private wildfire technology testbed program jointly housed at USDA and DOI to include federal land management agencies, and other agencies involved with wildfire response. Collectively, the program is instructed to identify and advance key relevant technologies in a competitive pilot program with private companies, nonprofits, and institutions of higher learning. The Commission identified the need for the development and adoption of new technologies for wildfire detection, mitigation, response, and related activities, recommending the development of a fire science and technology advisory board to aid this process.
- **Sec. 309. Fire-Safe Electric Corridors:** Allows the Forest Service or Bureau of Land Management to provide standing permission for electrical utilities to cut and remove hazardous trees near power lines without requiring a timber sale.

When it comes to wildfire risk reduction, there is often a focus on forest and land management to the exclusion of issues involving the built environment (homes, businesses, infrastructure). We applaud the sponsors for including language in the Fix Our Forests Act to create a new “Community Wildfire Risk Reduction Program”. Recognizing there are 44 million homes at risk in the wildland-urban interface, we encourage additional focus by Congress to improve the resiliency of the built environment, which is a critical piece of any comprehensive wildfire solution, to prevent conflagration-scale losses. An appendix has been included identifying key recommendations from the Commission report that promote greater risk identification, preparedness and response, and recovery.

Thank you for the opportunity to highlight policies that can help reduce the risk of catastrophic wildfires. The Fix Our Forests Act will help reduce this risk and safeguard lives, properties, and the environment. We stand ready to serve as a resource as the Committee works to advance wildfire solutions.

APPENDIX

The Commission's final report includes 148 consensus-based recommendations, which highlight the critical need to improve federal policies at every stage of the wildfire cycle —before, during, and after fire -- to reduce the risk of catastrophic wildfires and the harmful impacts to communities and the environment. This includes better integration of technology, data, tools, and ensuring workforce and capacity.

Below are some selected recommendations within each fire stage to illustrate the comprehensive approach taken by the Commission.

BEFORE FIRE - REDUCING WILDFIRE RISK:

NATURAL ENVIRONMENT

- **PRIORITIZE AND INVEST IN FUEL REDUCTION TREATMENTS —** Invest in and make fuel reduction planning more effective and efficient; change the system of land management agency performance metrics beyond acres treated to actual risk reduced. *[See Report Recommendation(s): 17, 33, 147]*
- **FACILITATE PRESCRIBED BURNING —** (1) Direct Federal agencies develop a strategic plan for the implementation of prescribed fire at a national scale and clarify the extent to which non-federal partners in this plan have Federal Tort Claims Act protection when burning on federal lands. (2) Create a compensation or claims fund for burn damages to third parties that can quickly provide financial relief in instances of escape – also examine whether Farm Service Agency and Natural Resources Conservation Service programs can be used to compensate producers for forage losses due to the use of beneficial fire. (3) Direct EPA, DOI and USDA to work together to expeditiously evaluate current federal regulations (such as the exceptional events pathway) around the treatment of smoke from wildland fire in air quality management programs with the intent of ensuring the programs can accommodate increased use of beneficial fire. *[See Report Recommendation(s): 10, 11, 12, 42, 59]*
- **FACILITATE MECHANICAL THINNING TREATMENTS —** Invest in wood processing facilities and the wood utilization sector as well as programs to help private landowners dispose of woody biomass. Incentivize pilot projects for biofuels and biomass utilization technologies as well as the adoption of new technologies and processing systems to produce value added, and demand-driven innovative wood products. *[See Report Recommendation(s): 19, 20, 21, 27]*
- **FACILITATE FINE FUELS REDUCTION —** Manage fine fuels and shrubs through the expanded use of flexible, targeted grazing and develop new, nimble ways to apply targeted, off-season grazing to treat invasive annual grasses. *[See Report Recommendation(s): 22, 23]*
- **ACCELERATE HAZARDOUS FUELS REDUCTION —** Reduce red tape and accelerate funding to more quickly address hazardous fuels by expanding hazardous fuels authorizations by predetermined amounts above appropriations. *[See Report Recommendation(s): 25]*

BUILT ENVIRONMENT

- **COMMUNITY WILDFIRE RISK REDUCTION PROGRAM —** Establish an interagency coordinating partnership to reduce program friction and create greater alignment and support to proactively address wildfire risk reduction actions and increase ignition resistance of the built environment. *[See Report Recommendation(s): 1]*
- **UPDATE EXISTING FEDERAL PROGRAMS TO INCLUDE WILDFIRE —** Integrate wildfire risk reduction measures and technical assistance into existing programs. *[See Report Recommendation(s): 2]*
- **IMPROVE HAZARD ASSESSMENTS —** Support data procurement and analytic systems to inform building codes/standards and promote ignition resistant construction and defensible space. Evaluate need to refine and/or expand state and national wildfire hazard datasets. *[See Report Recommendation(s): 4]*
- **IMPROVE HAZARD DISCLOSURES —** Require all-hazard risk disclosures for real estate transactions involving all federally backed mortgages. *[See Report Recommendation(s): 5]*
- **INCENTIVIZE COMMUNITY PREPARATION ACTIVITIES —** (1) Create incentives to encourage state, local, and Tribal governments to improve land use planning while increasing accessibility of federal grants for wildfire risk reduction efforts. (2) Incentivize innovation in affordable building material design, subdivision design, landscape architecture, and safe and sustainable building practices to create more ignition-resistant structures and communities. *[See Report Recommendation(s): 3, 6, 142]*
- **UTILITY HARDENING —** While continuing resilience investments in energy infrastructure systems, develop both federal standards for electric utility wildland fire mitigation plans and consistent rules and processes for wildfire management of federal rights-of-way. *[See Report Recommendation(s): 7, 8, 9]*

WORKFORCE, TECHNOLOGY & DATA

- **CREATE MITIGATION WORKFORCE —** Create and train a fire workforce primarily focused on restoration and mitigation, to include a Reservist Program to increase both planning and implementation capacity. *[See Report Recommendation(s): 55, 89, 93, 95]*
- **FIRE ENVIRONMENT CENTER —** Establish interagency joint office (Fire Environment Center) for comprehensive assessment and prediction of fire in the wildland and built environment interface to inform land and fuels management, community risk reduction, and fire management and response. *[See Report Recommendation(s): 104, 105, 106]*
- **EXPAND SHARED DATA —** Support data collaboration to advance modeling and to improve codes, standards, and ignition-resistant materials. *[See Report Recommendation(s): 107, 108]*
- **IMPROVE TOOLS —** Direct relevant agencies to adopt new and existing technologies to improve the mitigation and management of wildfire and establish more flexible means to work with the private sector. *[See Report Recommendation(s): 117, 118]*

DURING FIRE — RESPOND:

- **SUPPORT THE FRONTLINE —** Increase wages and benefits for the federal wildland fire workforce and make permanent the Wildfire Suppression Operations Reserve Fund. *[See Report Recommendation(s): 84, 121]*
- **SMOKE MONITORING AND MITIGATION CAPABILITIES —** Invest in national monitoring and alert systems and public strategies to mitigate smoke impacts. *[See Report Recommendation(s): 43, 44]*
- **STREAMLINE EVACUATION PROTOCOLS —** Provide support for local entities to utilize the best available technology and develop consistent methods for evacuation, including incorporating a new national standard of evacuation terminology based on "Ready, Set, Go!" terminology. *[See Report Recommendation(s): 45, 46]*

AFTER FIRE — RECOVER:

- **SPEED-UP RECOVERY —** Increase the deployment speed of community mitigation and recovery funds for wildfires while also accelerating individual recovery and increasing flexible housing options. *[See Report Recommendation(s): 61, 71, 72, 73, 74]*
- **EXPAND RECOVERY —** Expand FEMA Public Assistance-eligible activities to cover downstream risks caused by wildfire and review/amend existing programs for barriers which prevent distribution of funds to mitigate impacts from higher flows as a result of wildfire. *[See Report Recommendation(s): 63, 79]*
- **FACILITATE RECOVERY —** Expand existing/create new Categorical Exclusion (N12) to include activities associated with post-wildfire soil stabilization and erosion control measures. *[See Report Recommendation(s): 81]*
- **TECHNICAL SUPPORT —** Increase funding and technical assistance to state, local, tribal and territorial partners to manage post-fire recovery. For example, by amending the Stafford Act to allow Section 1206 funding for code enforcement for up to 24 months rather than the current 180 days. *[See Report Recommendation(s): 68, 70]*

American Property Casualty Insurance Association℠

INSURING AMERICA apci.org

555 12th Street, NW, Suite 550, Washington, DC 20004
8700 W. Bryn Mawr Avenue, Suite 1200S, Chicago, IL 60631-3512

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