

## 1539 WG Draft Survey Response

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

No.

Each specific use (insurance, building permits, environmental ordinances) has unique requirements and considerations that necessitate specialized standards. In other words, a one size fits all approach is not feasible.

A single wildfire property risk mitigation standard cannot effectively cover all other applicable uses or account for wide variations in environment, application, safety, hazard, risk, and technology. Standards require frequent updates to stay current with emerging scientific data and technological advancements related to our understanding of hazards, risk, and safety. It is impractical to maintain a single standard across all uses.

2. If yes, which standard encompasses all use cases?

No

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

Yes

DNR supports the adoption of the IBHS Wildfire Prepared Home Standard for insurability of dwellings.

DNR is promoting FIREWISE USA Sites through its Community Resilience program as a reinforcing effort to IBHS.

IWUI Code is already in RCW 19.27.560

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

Adoption of a single property mitigation standard (e.g. IBHS) could be a joint venture led by WA State Fire Marshal's Office, with support from WA DNR and input from the OIC.

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

Yes.

Expanding and supporting the work of DNR's Community Resilience Program helps drive a multi-pronged approach combining financial and technical assistance to homeowners and communities, outreach and education, as well as community wide collaborative planning.

DNR's Community Resilience Program supports collaborative planning and partnerships across jurisdictions by providing guidance in the development of Community Wildfire Protection Plans (CWPPs) and promoting Firewise USA Sites – a national program providing a framework for communities to work together to protect their homes and neighborhoods from wildfire.

Statewide adoption of the IBHS Wildfire Prepared Home Standard will create consistent implementation of various efforts which are already closely aligned.

DNR promotes national standards with its Community Resilience/Wildfire Ready Neighbors program including the IBHS Wildfire Prepared Home Standard.

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

Yes.

The increasing severity and frequency of wildfires threaten lives, homes, infrastructure, and economic vitality. In 2021, the State committed to investing \$500 million over eight years for wildfire preparedness and response, however, only \$60 million was provided in the current biennial budget for the Department of Natural Resources. The remaining roughly \$60 million should be provided to DNR in a supplemental budget (\$20 million in FY26 and \$40 million in FY27) to support proven investments in wildfire prevention, readiness, and initial attack capacity. These funds represent focused, cost-effective investments that reduce long-term risks and expenses while safeguarding Washington's communities, environment, and economy, and expanding community resilience, hazardous fuels reduction, and help ensure our firefighting teams can act quickly to keep small fires from becoming catastrophic. Without these funds Washington could see an increased number of fires that are going to be larger and cost the taxpayers more money.

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

Yes.

Under 1168, a minimum of 15% of funding is required for DNR's Community Resilience program. An additional investment by the legislature is needed to achieve the risk reduction necessary. Increased support for community mitigation efforts cannot come at the expense of current fuels reduction, forest management or wildfire response as these are complimentary and supporting mitigation efforts.

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

Yes.

Washington Fire Adapted Communities Learning Network (WAFAC) has a statewide strategy that aligns with national directives for resilient landscapes, safe and effective wildfire response, and fire adapted communities as identified in the National Cohesive Wildland Fire Management Strategy (Cohesive Strategy). DNR recommends continuing to invest in existing policy frameworks (i.e. Cohesive Strategy) instead of creating new or redundant policy frameworks. The baseline to accelerate mitigation at the community level already exists in Washington State, including in DNR's Wildland Fire Protection 10-Year Strategic Plan.

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

DNR currently spends taxpayer dollars on open access public portals for wildfire hazard and risk mitigation, therefore the department is not able to provide additional financial support to WaTech to house existing DNR data. Using multiple sites storing the same data is duplicative and not a good use of taxpayer dollars. We do recommend WaTech consider linking to and using DNR's open access public portals.

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

If it's an open data portal local fire districts should be able to access.

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

ESB 6120 has directed the DNR to work with the State Fire Marshal to develop a base level map for hazard and risk for the state. Given DNR's jurisdiction and capacity, the Department focuses on assessment, mapping and mitigation of wildland fire "hazard" at the landscape and community level. We recommend coordinating hazard and risk

mapping with this ongoing effort, as a joint effort of DNR, the State Fire Marshal, and the OIC. We see a need for and support using other sources of data and analytics to improve "risk" mapping at the parcel level but recommend coordinating it through the ongoing ESB 6120 directed mapping work.

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

Yes.

The Washington Wildland Fire Protection 10-Year Strategic Plan and the 5-Year Review of the Plan recently completed by the Wildland Fire Advisory Committee identify this as a high priority information and planning need. Legislative direction and support for improving the standardization, collection, reporting and dissemination of this information would be very valuable for planning and directing resources to areas where more work is needed as well as highlighting where work has been done and can be leveraged for providing better fire protection

DNR has an interactive online platform that gathers and displays forest health project information across all lands in Washington that facilitates strategic cross-boundary planning, implementation, and monitoring of forests. Not all forest health project information can be displayed on this website, such as data associated with privacy restrictions. So, in addition to this website, DNR maintains a comprehensive forest health treatment tracking database that is utilized for routine progress reporting on forest health strategic plan goals.

Increasing forest health and resiliency across all-lands in Washington is a highly collaborative effort, requiring coordination amongst individuals and organizations across the state. The evolving data displayed in this website across local, state, federal, tribal, and private land ownership is a reflection of that collaboration and commitment.

Additionally, the National Association of State Foresters has launched a new Grant Accomplishment Reporting Portal (GARP) which serves as an accomplishments data

repository to communicate and quantify the collective investments being made by state forestry agencies like WA DNR, nationwide under US Forest Service Cooperative Fire grants.

13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested: No, Yes, Other...

No response.

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

No response.

15. If yes, what information should be included to the consumer: (please click all that apply)

No response.

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

No response.

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of non-renewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and

pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

Yes.

The IBHS Wildfire Prepared Home standard should be used as the framework for the grant program because it translates the latest wildfire research into actionable, science-based mitigation steps that homeowners can take to significantly reduce their home's risk of ignition from wind-driven embers and direct heat, and is the only property mitigation standard recognized by the insurance industry and therefore is more likely to result in improved access to insurance for homeowners.

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator. Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

Yes.

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

Local fire districts should participate in the scoring for proposals and evaluating applications received in their local area.

Grants should be prioritized with the following considerations:

- A) DNR Hazard Map (identify hazard threshold where grants would be prioritized)
- B) Areas where access to insurance due to wildfire is a problem
- C) Communities with updated CWPPs
- D) Use of the Health Disparities Mapping tool and tools for identifying and prioritizing underserved communities.

Low income and traditionally underserved communities are frequently those most vulnerable and at risk to wildland fire and have historically been excluded from wildland fire mitigation assistance because of their inability to provide matching funds and a general lack of capacity and service providers in their communities. A mitigation grant program should correct for this issue and prioritize providing assistance to these areas to address the existing inequities around wildland fire mitigation efforts.

Limit grant funding to the home and curtilage. Curtilage is the immediate area surrounding a home, such as a yard, porch, or driveway, that is considered an extension of the home itself.

A greater investment by the legislature to support a new grant program is needed to achieve the levels of risk reduction desired.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

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[REDACTED]

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

As established in statute (RCW 76.04.005), the Washington Department of Natural Resources provides wildfire protection over "Department protected lands" meaning all lands subject to the forest protection assessment under RCW 76.04.610 or covered under contract or agreement pursuant to RCW 76.04.135 by the department. "Department protected lands" includes over 13 million acres of undeveloped non-federal forestland including state and private forestlands across the state.

DNR jurisdiction of "Department protected lands" covers wildland fires, which are uncontrolled fires on forestland subject to the forest protection assessment under RCW 76.04.610. DNR often responds to wildland fires burning on department protected lands within the wildland urban interface (WUI) however, DNR does not have jurisdiction or authority to respond to structural fires. DNR's jurisdictional boundaries for wildland fire response efforts end where forestland meets the built environment in communities.

Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☐ No

☐ Yes

☒ Other, please list

There is not a one size fits all solution in this space when accounting for demographics, risk levels and density. However, the standards do need to be coordinated and aligned with common objectives. Recommend a Coordinating Council.

2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☐ Yes

☒ Other, please list

Adoptions of proven existing standards vs. creating new ones is recommended in this space, and these entities should be coordinated on clearly aligned objectives.

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☐ Yes

☒ Other, please list

Standards for reducing fire risk on individual properties and across communities shouldn't be set by fire agencies alone. Firefighters and emergency responders bring important expertise, but the process also needs input from other people with knowledge and experience. Once standards are in place, making them work should come through community-based efforts, with local leaders like fire officials, emergency managers, and building inspectors helping guide and encourage compliance.

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Although recommended, funding becomes the next concern as it was very clear in our sessions that funding has been cut across all of these programs. Careful considerations need to be taken to establish funding.

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Funding for HB 1168 should be restored and fully appropriated from the general fund as was originally intended, and the fund should not be raided or funding reappropriated for other non-wildfire-related purposes.

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Although recommended, it is important that any additional funding come from appropriate, sustainable sources, and not create disproportionate burdens or the potential for unintended consequences. Funding should be broad-based, fair, and aligned with the shared responsibility of wildfire preparedness and response.

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

- ☐ No
- ☐ Yes
- ☒ Other, please list

This is recommended, however broader than incentives and not just local level coordinating groups. There needs to be engaged state level coordination with best practices that aligns with accountability.

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Agree with the recommendation, however, the information should be broadly available to assist with regional or local efforts. The data should be safeguarded through the use of data sharing agreements and should not be considered the sole data point necessary for the development of land use requirements or insurance risk scoring scenarios.

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

*This question was not displayed to the respondent.*

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No

☐ Yes

☒ Other, please list

Data should be confined to creating and updating risk assessments exclusively for public entities. Private industry has stated need for reliable catastrophe models and dynamic wildfire risk scores. The utilization of these models and scores benefits insurance consumers by offering accurate and dependable information to insurers. This, in turn, allows insurers to write policies that weigh risk with cost to ensure solvency. It would not be ideal to replace or interfere with the ongoing development of competing models or risk scores from private industry sources.

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

☐ No

☐ Yes

☒ Other, please list

Although recommended, data should be collected over time as an absolute proof of concept before deploying any actionable activities in response to the data collection. This does not replace ordinance or insurance modeling to determine risk exposures.

13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

☐ No

☐ Yes

☒ Other, please list

Suggest identifying other solutions in this space to track the insurability of Wildfire risk. Looking at the reinsurance market would help understand insurability across admitted companies in Washington.

. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☐ Yes
- ☒ Other, please list

It's important to understand that Wildfire does not impact the greater population of Washington State. Sharing a wildfire score could cause confusion if shared broadly or without context with consumers as insurers utilize various private data companies for these risk factors.

15. If yes, what information should be included to the consumer: (please click all that apply)

*This question was not displayed to the respondent.*

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

*This question was not displayed to the respondent.*

. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Recommend that the grant program promotes a decrease in Wildfire Damage across the state, this in turn reduces the number of insurance non renewals over time. The mitigation efforts need to show they are successful, before insurance companies can respond to the decrease in losses. IBHS is the only standard that has the potential to track success due to its current use in other states.

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

Not only is it imperative that the grant program collaborate with local fire districts as part of the program, the fire districts should have a say on the grants for their area. They are the experts in their territories and understand the needs of the communities they serve.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

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. Contact Information

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. First series of recommendations:

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1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☐ No

☒ Yes

☐ Other, please list

2. If yes, which standard encompasses all use cases?

FireWise and IBHS

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☒ No

☐ Yes

☐ Other, please list

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☒ Yes

☐ Other, please list

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a

national recognized science-based, wildfire mitigation standard(s)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☒ No
- ☐ Yes
- ☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a

formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

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- ☒ Yes
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11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with

accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No
- ☒ Yes
- ☐ Other, please list

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

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13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

- ☐ No
- ☒ Yes
- ☐ Other, please list

. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with

the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☒ Yes
- ☐ Other, please list

15. If yes, what information should be included to the consumer: (please click all that apply)

- ☐ Name of model used to determine the wildfire risk score.
- ☐ The date the wildfire risk score was generated.
- ☐ The range of scores available in the risk score model.
- ☒ The range of scores that determine insurance eligibility for the insurance company.
- ☒ What mitigation measures the consumer could carry out to improve the score and become eligible for insurance.

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

- ☐ By request from consumer
- ☒ Automatically provided when wildfire risk scores are used.

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be

considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☒ Yes
- ☐ Other, please list

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

It should be a pass-through; communities with high-risk should be prioritized. Once grant funding is provided, the local fire districts should be the ones to manage where the funds go since they know their communities best.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

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. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

As established in statute (RCW 76.04.005), the Washington Department of Natural Resources provides wildfire protection over "Department protected lands" meaning all lands subject to the forest protection assessment under RCW 76.04.610 or covered under contract or agreement pursuant to RCW 76.04.135 by the department. "Department protected lands" includes over 13 million acres of undeveloped non-federal forestland including state and private forestlands across the state.

DNR jurisdiction of "Department protected lands" covers wildland fires, which are uncontrolled fires on forestland subject to the forest protection assessment under RCW 76.04.610. DNR often responds to wildland fires burning on department protected lands within the wildland urban interface (WUI) however, DNR does not have jurisdiction or authority to respond to structural fires. DNR's jurisdictional boundaries for wildland fire response efforts end where forestland meets the built environment in communities.

Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☐ No

☒ Yes

☐ Other, please list

2. If yes, which standard encompasses all use cases?

building codes, vegetation clearance standards

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☒ Yes

☐ Other, please list

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☒ Yes

☐ Other, please list

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a

national recognized science-based, wildfire mitigation standard(s)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a

formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

- ☐ No
- ☒ Yes
- ☐ Other, please list

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

- ☐ No
- ☒ Yes
- ☐ Other, please list

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with

accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No
- ☒ Yes
- ☐ Other, please list

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

- ☐ No
- ☒ Yes
- ☐ Other, please list

13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

- ☐ No
- ☒ Yes
- ☐ Other, please list

. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with

the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☒ Yes
- ☐ Other, please list

15. If yes, what information should be included to the consumer: (please click all that apply)

- ☒ Name of model used to determine the wildfire risk score.
- ☒ The date the wildfire risk score was generated.
- ☒ The range of scores available in the risk score model.
- ☒ The range of scores that determine insurance eligibility for the insurance company.
- ☒ What mitigation measures the consumer could carry out to improve the score and become eligible for insurance.

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

- ☐ By request from consumer
- ☒ Automatically provided when wildfire risk scores are used.

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be

considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☒ Yes
- ☐ Other, please list

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

Collaboration on appropriate tactics and methodology for retrofits.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

Name:

Michael Newman

E-mail Address:

[REDACTED]

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

As established in statute (RCW 76.04.005), the Washington Department of Natural Resources provides wildfire protection over "Department protected lands" meaning all lands subject to the forest protection assessment under RCW 76.04.610 or covered under contract or agreement pursuant to RCW 76.04.135 by the department. "Department protected lands" includes over 13 million acres of undeveloped non-federal forestland including state and private forestlands across the state.

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Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☐ No

☐ Yes

☒ Other, please list

No. IBHS's Wildfire Prepared (WFP) program is not intended to replace a state-wide WUI code; rather, it is intended to supplement one. We recommend using the IWUI code as the basis for a Washington State WUI code, and WFP to inform insurance programs, such as a home hardening grant program. We do not have an opinion on how IWUIC or WFP would be relevant to environmental protection ordinances.

2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☐ Yes

☒ Other, please list

No. IBHS's Wildfire Prepared (WFP) program is not intended to replace a state-wide WUI code; rather, it is intended to supplement one. We recommend using the IWUI code as the basis for a Washington State WUI code, and WFP to inform insurance programs, such as a home hardening grant program. Firewise is a useful program to encourage neighborhood-scale community, engagement, and action, but it does not have a risk mitigation standard and is therefore not outcome-focused. IBHS Wildfire Prepared Neighborhood does have a community-scale risk mitigation technical standard.

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☐ Yes

☒ Other, please list

Experiences from other states suggest that first responders to fire must have an important voice in the development of property- and community-level wildfire mitigation standards, but they should not have the only voice. Consistent with the position that multiple wildfire codes and standards are necessary in Washington, standards should be developed by the most appropriate government entity. Key stakeholders include fire services, emergency management, building code officials, wildfire science subject matter experts, community groups, and the insurance industry.

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

☐ No

☒ Yes

☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

☐ No

☒ Yes

☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Yes. There are also national-level efforts underway to create consistency in wildfire data standards. To the extent possible. Washington State should develop an approach that is consistent and compatible with these broader efforts.

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

*This question was not displayed to the respondent.*

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No
- ☐ Yes
- ☒ Other, please list

Yes, to the extent that such resources are provided to public entities and not required for private companies, who already have access to sophisticated hazard and risk assessments.

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Yes, provided that such a resource is a tool but not a requirement for private companies, particularly the insurance industry. Verification of risk mitigation actions at the parcel and community level are critical to consideration by property insurers. While the information repository could be helpful, without consistent and ongoing verification of the information contained therein, it may be of more limited utility to insurers. With that said, even without rigorous verification, the repository might be of use by public entities at the state and local level to inform policymaking and spending priorities.

13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was

used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

- ☐ No
- ☐ Yes
- ☒ Other, please list

No opinion.

**. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and**

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☐ Yes
- ☒ Other, please list

No opinion.

15. If yes, what information should be included to the consumer: (please click all that apply)

*This question was not displayed to the respondent.*

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

*This question was not displayed to the respondent.*

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

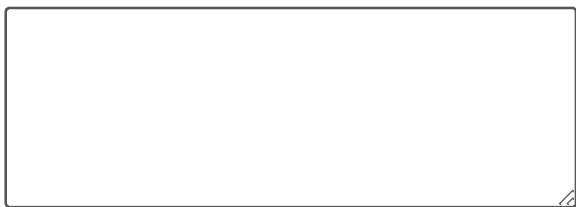
- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☒ Yes
- ☐ Other, please list



18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

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19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list



20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

No to a requirement, yes to collaboration. Unlike other perils, wildfire grants are best deployed in a strategic, concentrated way. As I have heard, “random acts of retrofit” are not effective in the wildfire context. Community groups and local fire districts can be critical partners that help identify areas of high risk and vulnerability; which neighborhoods are willing to take action; which communities have already organized; and how finite grant resources can be best deployed.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

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. Contact Information

Name:

John Goldsmith

E-mail Address:

[REDACTED]

. First series of recommendations:

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1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☐ No

☒ Yes

☐ Other, please list

2. If yes, which standard encompasses all use cases?

IWUI

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☒ No

☐ Yes

☐ Other, please list

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☒ No

☐ Yes

☐ Other, please list

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a

national recognized science-based, wildfire mitigation standard(s)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a

formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

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- ☐ No
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- ☒ No
- ☐ Yes
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accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No
- ☒ Yes
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12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

- ☐ No
- ☒ Yes
- ☐ Other, please list

13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

- ☐ No
- ☒ Yes
- ☐ Other, please list

. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with

the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☒ Yes
- ☐ Other, please list

15. If yes, what information should be included to the consumer: (please click all that apply)

- ☒ Name of model used to determine the wildfire risk score.
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- ☒ What mitigation measures the consumer could carry out to improve the score and become eligible for insurance.

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- ☐ By request from consumer
- ☒ Automatically provided when wildfire risk scores are used.

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considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☒ Yes
- ☐ Other, please list

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

With the local fire official

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

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. Contact Information

Name:

Mark Sektnan

E-mail Address:

[REDACTED]

. First series of recommendations:

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The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

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☐ No

☒ Yes

☐ Other, please list

2. If yes, which standard encompasses all use cases?

IBHS wildfire prepared

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☐ Yes

☒ Other, please list

IBHS Wildfire Prepared Home (and Neighborhood) for parcel and community scale mitigation. A yet to be finalized, though forthcoming WUI ICC code that includes defensible space requirements consistent with IBHS is also beneficial.

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☐ Yes

☒ Other, please list

A consistent standard should be employed for land use and code adoption/enforcement. This may not be limited to only fire suppression/response officials.

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a

national recognized science-based, wildfire mitigation standard(s)?

- ☒ No
- ☐ Yes
- ☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a

formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Not necessarily opposed. However, California is developing a multi-state initiative called the WUI Data Commons, supported by the Gordon and Betty Moore Foundation and led by Nancy Watkins of Milliman. This effort aims to create a centralized, standardized wildfire risk data platform that could eventually support insurers, fire agencies, and communities across multiple states to help provide visibility on "existing" properties that have been mitigated to key mitigation standards. There may be opportunities/benefits in connecting with this initiative to align with broader national strategies. Here is a link to the project's latest report. The state might also consider establishing/updating a wildfire hazard map to help inform land use policies, building codes, hazard disclosures and other allocation of resources in wildfire-prone regions.

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

*This question was not displayed to the respondent.*

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

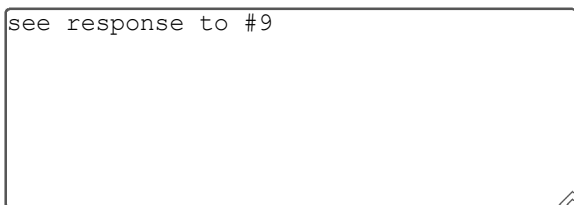
- ☐ No
- ☒ Yes
- ☐ Other, please list



12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

- ☐ No
- ☐ Yes
- ☒ Other, please list

see response to #9



13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

- ☒ No
- ☐ Yes
- ☐ Other, please list



. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☐ Yes
- ☒ Other, please list

No. If so, only upon request of the consumer

15. If yes, what information should be included to the consumer: (please click all that apply)

*This question was not displayed to the respondent.*

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

*This question was not displayed to the respondent.*

. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Support a grant program that is tied to an evidence-based mitigation program (i.e., IBHS). Oppose insurance mandates related to eligibility and pricing due to complex and varying business needs.

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

Name:

Melanie Thurlow

E-mail Address:

- . First series of recommendations:
- (a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

As established in statute (RCW 76.04.005), the Washington Department of Natural Resources provides wildfire protection over "Department protected lands" meaning all lands subject to the forest protection assessment under RCW 76.04.610 or covered under contract or agreement pursuant to RCW 76.04.135 by the department. "Department protected lands" includes over 13 million acres of undeveloped non-federal forestland including state and private forestlands across the state.

DNR jurisdiction of "Department protected lands" covers wildland fires, which are uncontrolled fires on forestland subject to the forest protection assessment under RCW 76.04.610. DNR often responds to wildland fires burning on department protected lands within the wildland urban interface (WUI) however, DNR does not have jurisdiction or authority to respond to structural fires. DNR's jurisdictional boundaries for wildland fire response efforts end where forestland meets the built environment in communities.

Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

- ☐ No
- ☐ Yes

☒ Other, please list

A single standard may not account for the differing requirements, objectives, and definitions across insurance, permitting, and environmental uses.

2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☒ Yes

☐ Other, please list

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☐ Yes

☒ Other, please list

Ideally the answer would be yes; however, some communities may not gain a consensus to enforce standards for economic or political reasons.

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

- ☐ No
- ☐ Yes
- ☒ Other, please list

While these efforts should be expanded, insurance companies should not be required to write coverage in high-risk areas solely because community engagement or mitigation efforts exist, as these do not ensure that the risk has been eliminated or sufficiently mitigated. Carriers also require underwriting flexibility to manage their concentration of risk. This protects against carrier insolvency in the long-term.

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Response depends on the implications of funding and whether this refers to state-level funding.

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Possible Yes; however, the allocation and impact of funding must be clarified.

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

☐ No

☐ Yes

☒ Other, please list

Yes, but only as long as incentives don't restrict insurers' ability to underwrite or subsidize risk.

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

☐ No

☐ Yes

☒ Other, please list

This could be useful, but we note that there is risk that the portal could become politicized as was the case in Oregon. If yes, then a recommendation should include the legislature directing WA Tech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal.

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

*This question was not displayed to the respondent.*

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No
- ☐ Yes
- ☒ Other, please list

Our response depends on additional information such as which entity would be selected and how that entity would determine accuracy of assessments.

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

- ☐ No
- ☒ Yes
- ☐ Other, please list

13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

- ☐ No
- ☐ Yes
- ☒ Other, please list

Yes, with a caveat. Carriers should track non-renewals, cancellations and eligibility. However, carriers should not have to send out communications to customers every time a rating factor relating to wildfire changes.

**. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with**

the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Not all carriers use scores, and disclosure would impose significant costs on the industry to provide information that is unlikely to be understood by most consumers. If scores are provided, then wildfire risk score disclosure should only be provided upon request of the consumer.

15. If yes, what information should be included to the consumer: (please click all that apply)

*This question was not displayed to the respondent.*

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

*This question was not displayed to the respondent.*

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Yes, but considering the high cost of retrofitting a home (\$30K - \$60K), what will be involved in the grant program to promote participation?

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Yes, but the details of the grant program are unclear.

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

*This question was not displayed to the respondent.*

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

Name:

Steve Brioks

E-mail Address:

[REDACTED]

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

As established in statute (RCW 76.04.005), the Washington Department of Natural Resources provides wildfire protection over "Department protected lands" meaning all lands subject to the forest protection assessment under RCW 76.04.610 or covered under contract or agreement pursuant to RCW 76.04.135 by the department. "Department protected lands" includes over 13 million acres of undeveloped non-federal forestland including state and private forestlands across the state.

DNR jurisdiction of "Department protected lands" covers wildland fires, which are uncontrolled fires on forestland subject to the forest protection assessment under RCW 76.04.610. DNR often responds to wildland fires burning on department protected lands within the wildland urban interface (WUI) however, DNR does not have jurisdiction or authority to respond to structural fires. DNR's jurisdictional boundaries for wildland fire response efforts end where forestland meets the built environment in communities.

Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☐ No

☒ Yes

☐ Other, please list

2. If yes, which standard encompasses all use cases?

IBHS

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☒ No

☐ Yes

☐ Other, please list

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☒ Yes

☐ Other, please list

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a

national recognized science-based, wildfire mitigation standard(s)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a

formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

- ☐ No
- ☒ Yes
- ☐ Other, please list

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

- ☐ No
- ☒ Yes
- ☐ Other, please list

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with

accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No
- ☒ Yes
- ☐ Other, please list

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

- ☐ No
- ☒ Yes
- ☐ Other, please list

13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

- ☐ No
- ☒ Yes
- ☐ Other, please list

. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with

the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☒ Yes
- ☐ Other, please list

15. If yes, what information should be included to the consumer: (please click all that apply)

- ☐ Name of model used to determine the wildfire risk score.
- ☒ The date the wildfire risk score was generated.
- ☒ The range of scores available in the risk score model.
- ☒ The range of scores that determine insurance eligibility for the insurance company.
- ☒ What mitigation measures the consumer could carry out to improve the score and become eligible for insurance.

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

- ☐ By request from consumer
- ☒ Automatically provided when wildfire risk scores are used.

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be

considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☒ Yes
- ☐ Other, please list

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

The Washington Fire Chiefs Association can serve as a primary conduit for communication and collaboration and aid in identifying other key stakeholders

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

Name:

Angela Doss

E-mail Address:

[REDACTED]

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

As established in statute (RCW 76.04.005), the Washington Department of Natural Resources provides wildfire protection over "Department protected lands" meaning all lands subject to the forest protection assessment under RCW 76.04.610 or covered under contract or agreement pursuant to RCW 76.04.135 by the department. "Department protected lands" includes over 13 million acres of undeveloped non-federal forestland including state and private forestlands across the state.

DNR jurisdiction of "Department protected lands" covers wildland fires, which are uncontrolled fires on forestland subject to the forest protection assessment under RCW 76.04.610. DNR often responds to wildland fires burning on department protected lands within the wildland urban interface (WUI) however, DNR does not have jurisdiction or authority to respond to structural fires. DNR's jurisdictional boundaries for wildland fire response efforts end where forestland meets the built environment in communities.

Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☐ No

☐ Yes

☒ Other, please list

One standard across all uses will be difficult to achieve and may have unintended consequences. It may be better to develop mitigation standards individually depending on whether it is a standard for insurance, building permits, or environmental protection ordinances. One size does not necessarily fit all situations.

2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☒ Yes

☐ Other, please list

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☐ Yes

☒ Other, please list

Yes, but having statewide standards would be very helpful as a baseline. This would also make it easier for communities to be built to mitigate for wildfire. Enforcement would also be easier. Perhaps statewide standards as a baseline, with the ability of local governments to go above and beyond that baseline standard?

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a

national recognized science-based, wildfire mitigation standard(s)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a

formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

- ☐ No
- ☒ Yes
- ☐ Other, please list

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

- ☐ No
- ☒ Yes
- ☐ Other, please list

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with

accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No
- ☒ Yes
- ☐ Other, please list

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

- ☐ No
- ☒ Yes
- ☐ Other, please list

13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

- ☐ No
- ☐ Yes
- ☒ Other, please list

Possibly, but this is a tricky requirement, because often wildfire risk is not the only reason why a policy may be nonrenewed or ineligible for coverage.

. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with

the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Wildfire risk scores themselves may not be all that helpful to consumers and may create more consumer confusion.

15. If yes, what information should be included to the consumer: (please click all that apply)

*This question was not displayed to the respondent.*

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

*This question was not displayed to the respondent.*

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

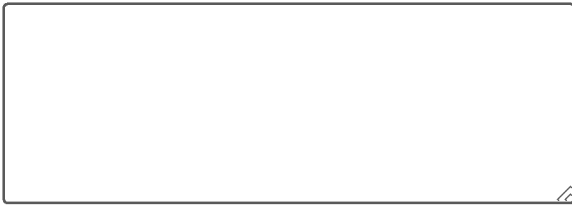
17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☒ Yes

☐ Other, please list



18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

☐ No

☒ Yes

☐ Other, please list



20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

Unsure exactly what this should look like, but robust communication between a grant program administrator and local fire districts is a must.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

Name:

Angela Bishop

E-mail Address:

[REDACTED]

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

As established in statute (RCW 76.04.005), the Washington Department of Natural Resources provides wildfire protection over "Department protected lands" meaning all lands subject to the forest protection assessment under RCW 76.04.610 or covered under contract or agreement pursuant to RCW 76.04.135 by the department. "Department protected lands" includes over 13 million acres of undeveloped non-federal forestland including state and private forestlands across the state.

DNR jurisdiction of "Department protected lands" covers wildland fires, which are uncontrolled fires on forestland subject to the forest protection assessment under RCW 76.04.610. DNR often responds to wildland fires burning on department protected lands within the wildland urban interface (WUI) however, DNR does not have jurisdiction or authority to respond to structural fires. DNR's jurisdictional boundaries for wildland fire response efforts end where forestland meets the built environment in communities.

Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

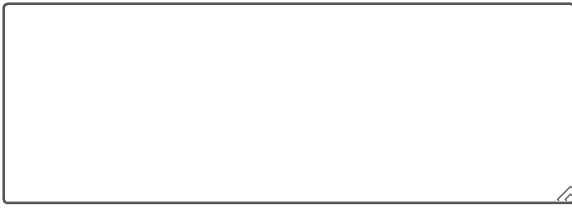
The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☒ No

☐ Yes

☐ Other, please list



2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☒ No

☐ Yes

☐ Other, please list



4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☒ Yes

☐ Other, please list



5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

☒ No

☐ Yes

☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

☒ No

☐ Yes

☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

☒ No

☐ Yes

☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

☐ No

☒ Yes

☐ Other, please list



**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

- ☒ No
- ☐ Yes
- ☐ Other, please list



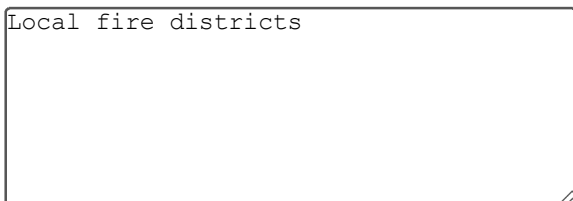
10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

*This question was not displayed to the respondent.*

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No
- ☐ Yes
- ☒ Other, please list

Local fire districts



12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

- ☒ No
- ☐ Yes
- ☐ Other, please list



13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

- ☐ No
- ☒ Yes
- ☐ Other, please list



**. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and**

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☒ Yes

☐ Other, please list



15. If yes, what information should be included to the consumer: (please click all that apply)

- ☒ Name of model used to determine the wildfire risk score.
- ☒ The date the wildfire risk score was generated.
- ☒ The range of scores available in the risk score model.
- ☒ The range of scores that determine insurance eligibility for the insurance company.
- ☒ What mitigation measures the consumer could carry out to improve the score and become eligible for insurance.

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

- ☐ By request from consumer
- ☒ Automatically provided when wildfire risk scores are used.

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☒ No
- ☐ Yes

☐ Other, please list

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

I don't agree that everyone should be required to retrofit their properties.

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

☐ No

☒ Yes

☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

Local Fire districts understand the risk to their areas/properties much better than the program administrator, and should take recommendations from local fire districts on what is needed.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

Name:

Tony Craven

E-mail Address:

[REDACTED]

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

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Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☐ No

☐ Yes

☒ Other, please list

Structure standards can be consistent but vegetation standards need to be tailored for the ecosystem and fire regime

2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☐ Yes

☒ Other, please list

Building standards can be the same vegetation management needs to factor in on the ground conditions

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☐ Yes

☒ Other, please list

most experts on community mitigation are not fire response entities. Also most fire districts are volunteer organizations

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

☐ No

☐ Yes

☒ Other, please list

See ten year strategic plan and Report 2561 2019. Need to modify WRN to be more inclusive and expansive

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

☐ No

☐ Yes

☒ Other, please list

Yes but more money needs to be spent in community resilience.

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

☐ No

☒ Yes

☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

☐ No

☒ Yes

☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

☐ No

☒ Yes

☐ Other, please list

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

☐ No

☐ Yes

☒ Other, please list

Yes but they need understand the data source and sets in the portal.

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

☐ No

☒ Yes

☐ Other, please list



12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

☐ No

☒ Yes

☐ Other, please list



13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

☐ No

☒ Yes

☐ Other, please list



. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☐ Yes
- ☒ Other, please list

No Current scoring system does not provide meaningful

15. If yes, what information should be included to the consumer: (please click all that apply)

*This question was not displayed to the respondent.*

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

*This question was not displayed to the respondent.*

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☐ Yes

☒ Other, please list

Yes IBHS for structure but vegetation standards should be site specific

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

☒ No

☐ Yes

☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

*This question was not displayed to the respondent.*

21. If no, please provide a rationale for not collaborating with local fire protection districts.

Mandatory laws do no allow the flexibility needed to implement these types of programs. Fire districts may not be the appropriate group to implement these programs

. Please click the 'Submit' button to submit the survey responses.

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. Contact Information

Name:

Jennifer Coe

E-mail Address:

. First series of recommendations:  
**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

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Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

- ☐ No
- ☐ Yes

☒ Other, please list

Hard to answer this question the way it's written. Yes, I think the state should adopt a wildfire property risk mitigation standard if it applies to a limited zone: the home/structures themselves and the first 30 ft.

2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☒ No

☐ Yes

☐ Other, please list

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☒ No

☐ Yes

☐ Other, please list

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

- ☐ No
- ☐ Yes
- ☒ Other, please list

I think we should ADAPT, RESTRUCTURE and expand WRN to support additional state-wide and locally coordinated campaigns

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Yes AND the recommendation should also include returning previous levels of funding to the Conservation Commission to support Conservation Districts work - they provide statewide capacity delivering this information and supporting on-the-ground implementation of wildfire mitigation practices with private landowners. Their programs are not currently supported by DNR and 1168 funds (although they have been in the past). This recommendation should support fully funding both agencies.

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☒ Yes

☐ Other, please list



8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

☐ No

☒ Yes

☐ Other, please list



**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

☐ No

☐ Yes

☒ Other, please list

Not sure



10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No
- ☐ Yes
- ☒ Other, please list

Parcel level risk assessments shouldn't be done by the state or a contractor. Parcel level risk information is a moving target. Assessments of risk at the parcel level should be done via the services that are currently in place (DNR's WNR Program, CDs programs, etc.)

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

- ☐ No
- ☐ Yes
- ☒ Other, please list

I think insurance companies should provide this to their customers for communication of parcel level mitigation efforts. Mitigation on a larger scale (community, region) should also have a repository visible to the public but not for parcel level information. The Living CWPP tool that DNR is gearing up for could be a tool to integrate.

13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

- ☐ No
- ☒ Yes

☐ Other, please list



**. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and**

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

☐ No

☒ Yes

☐ Other, please list



15. If yes, what information should be included to the consumer: (please click all that apply)

☒ Name of model used to determine the wildfire risk score.

☒ The date the wildfire risk score was generated.

☒ The range of scores available in the risk score model.

☒ The range of scores that determine insurance eligibility for the insurance company.

☒ What mitigation measures the consumer could carry out to improve the score and become eligible for insurance.

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

☐ By request from consumer

☒ Automatically provided when wildfire risk scores are used.

- . (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:
- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and
  - (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Yes, for individual properties and only within the first 30ft.

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☐ Yes

☒ Other, please list

Yes, but in the way that grant information is shared with the local fire districts vs administered by them. Fire districts should also be included in the development of the grant program specifics.

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

*This question was not displayed to the respondent.*

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

Name:

Ian "Lance" Dahl

E-mail Address:

[REDACTED]

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

As established in statute (RCW 76.04.005), the Washington Department of Natural Resources provides wildfire protection over "Department protected lands" meaning all lands subject to the forest protection assessment under RCW 76.04.610 or covered under contract or agreement pursuant to RCW 76.04.135 by the department. "Department protected lands" includes over 13 million acres of undeveloped non-federal forestland including state and private forestlands across the state.

DNR jurisdiction of "Department protected lands" covers wildland fires, which are uncontrolled fires on forestland subject to the forest protection assessment under RCW 76.04.610. DNR often responds to wildland fires burning on department protected lands within the wildland urban interface (WUI) however, DNR does not have jurisdiction or authority to respond to structural fires. DNR's jurisdictional boundaries for wildland fire response efforts end where forestland meets the built environment in communities.

Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☐ No

☒ Yes

☐ Other, please list

2. If yes, which standard encompasses all use cases?

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☒ Yes

☐ Other, please list

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☒ No

☐ Yes

☐ Other, please list

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a

national recognized science-based, wildfire mitigation standard(s)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a

formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

- ☐ No
- ☒ Yes
- ☐ Other, please list

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

- ☐ No
- ☒ Yes
- ☐ Other, please list

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with

accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No
- ☒ Yes
- ☐ Other, please list

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

- ☐ No
- ☒ Yes
- ☐ Other, please list

13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

- ☐ No
- ☒ Yes
- ☐ Other, please list

. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with

the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☒ Yes
- ☐ Other, please list

15. If yes, what information should be included to the consumer: (please click all that apply)

- ☒ Name of model used to determine the wildfire risk score.
- ☒ The date the wildfire risk score was generated.
- ☒ The range of scores available in the risk score model.
- ☒ The range of scores that determine insurance eligibility for the insurance company.
- ☒ What mitigation measures the consumer could carry out to improve the score and become eligible for insurance.

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

- ☐ By request from consumer
- ☒ Automatically provided when wildfire risk scores are used.

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be

considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☒ Yes
- ☐ Other, please list

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 22nd. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

Name:

Patty Kuderer

E-mail Address:

[REDACTED]

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

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Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

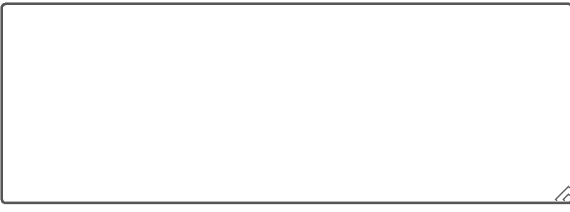
The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☒ No

☐ Yes

☐ Other, please list



2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☒ Yes

☐ Other, please list



4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☒ No

☐ Yes

☐ Other, please list



5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

☐ No

☒ Yes

☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

☐ No

☒ Yes

☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

☐ No

☐ Yes

☒ Other, please list

If the previous funding has been fully used, then it should be reviewed for an increase.

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

☐ No

☒ Yes

☐ Other, please list



**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

☐ No

☒ Yes

☐ Other, please list



10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

☐ No

☒ Yes

☐ Other, please list



11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

☐ No

☐ Yes

☒ Other, please list

This should be further studied so the information can be used to educate residents of their risk while not creating uncertain liability to the state..

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

☐ No

☐ Yes

☒ Other, please list

Further study needs to be done on this. There is clearly an information gap between mitigation work that has been completed and that information being available to fire districts, insurance companies, state and local governments, and community leaders. Further study is needed to understand how to respect privacy concerns and the best process to collect and share the information to interested parties.

13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

☐ No

☒ Yes

☐ Other, please list

. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with

the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☒ Yes
- ☐ Other, please list

15. If yes, what information should be included to the consumer: (please click all that apply)

- ☒ Name of model used to determine the wildfire risk score.
- ☒ The date the wildfire risk score was generated.
- ☒ The range of scores available in the risk score model.
- ☒ The range of scores that determine insurance eligibility for the insurance company.
- ☒ What mitigation measures the consumer could carry out to improve the score and become eligible for insurance.

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- ☒ Automatically provided when wildfire risk scores are used.

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be

considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☒ Yes
- ☐ Other, please list

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

Close collaboration and information sharing of how to identify at risk communities and sharing of completion of mitigation projects so the fire district is aware of increased protections.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

Name:

Korrie Bourn

E-mail Address:

[REDACTED]

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

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Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☐ No

☐ Yes

☒ Other, please list

I like the idea of a single standard with variations available within the standard. For example, the property should have fire-resistant siding but the specific type is up to the property owner. However, it seems difficult to develop a single standard that can apply to different property types with varying density/saturation and topographical differences.

2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☐ Yes

☒ Other, please list

Yes, if the standards are developed using well-researched data that has been proven to be effective. When determining what makes a dwelling insurable, it seems important to consult with the insurance companies first.

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☐ Yes

☒ Other, please list

The entities who respond to fires in the built environment should be consulted. I'm not sure it should fall solely under their responsibility to develop the standards.

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

- ☐ No
- ☐ Yes
- ☒ Other, please list

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10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

*This question was not displayed to the respondent.*

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No
- ☒ Yes

☐ Other, please list

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

☐ No

☒ Yes

☐ Other, please list

13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

☐ No

☐ Yes

☒ Other, please list

I don't have enough information to answer this question

. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☐ Yes
- ☒ Other, please list

No, for numerous reason I do not see a benefit to this. There is no relevant data in a wildfire risk score that would assist the consumer. Every company uses different methods to determine the score which leads to no consistency in the numbers. The score is simply a number. If the primary driver of a wildfire score is the slope of the property or topographical details that a property owner can't change, we are adding a burden to the insurance company with no tangible benefit the consumer.

15. If yes, what information should be included to the consumer: (please click all that apply)

*This question was not displayed to the respondent.*

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

*This question was not displayed to the respondent.*

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

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- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☒ Yes
- ☐ Other, please list

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

Depends on what the grant program is for. Soliciting input from the local fire districts at some point in the process would be beneficial as they have local knowledge.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

Name:

Coron Polley

E-mail Address:

- . First series of recommendations:
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The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

- ☐ No
- ☐ Yes

☒ Other, please list

I want to say yes, but there are reasons (adding complexity to building codes) that could cause other issues in certain cases.

2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☒ Yes

☐ Other, please list



4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☒ No

☐ Yes

☐ Other, please list



5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

- ☐ No
- ☐ Yes
- ☒ Other, please list

I support various methods of improving the health of state owned forest and shrub steppe in order to prevent wildfire spreading into communities. Much of HB 1168 is good legislation.

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a

formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

☐ No

☒ Yes

☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

☒ No

☐ Yes

☐ Other, please list

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

*This question was not displayed to the respondent.*

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

☒ No

☐ Yes

☐ Other, please list



12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

☐ No

☒ Yes

☐ Other, please list



13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

☒ No

☐ Yes

☐ Other, please list



**. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and**

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Requiring companies to disclose score is fine as long as companies have the right to use their own scoring systems and standards.

15. If yes, what information should be included to the consumer: (please click all that apply)

*This question was not displayed to the respondent.*

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

*This question was not displayed to the respondent.*

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☒ Yes

☐ Other, please list

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

☐ No

☐ Yes

☒ Other, please list

As long as funding to administer within the district is included.

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

*This question was not displayed to the respondent.*

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

Name:

Ron Gibbs

E-mail Address:

[REDACTED]

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

As established in statute (RCW 76.04.005), the Washington Department of Natural Resources provides wildfire protection over "Department protected lands" meaning all lands subject to the forest protection assessment under RCW 76.04.610 or covered under contract or agreement pursuant to RCW 76.04.135 by the department. "Department protected lands" includes over 13 million acres of undeveloped non-federal forestland including state and private forestlands across the state.

DNR jurisdiction of "Department protected lands" covers wildland fires, which are uncontrolled fires on forestland subject to the forest protection assessment under RCW 76.04.610. DNR often responds to wildland fires burning on department protected lands within the wildland urban interface (WUI) however, DNR does not have jurisdiction or authority to respond to structural fires. DNR's jurisdictional boundaries for wildland fire response efforts end where forestland meets the built environment in communities.

Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☐ No

☒ Yes

☐ Other, please list

2. If yes, which standard encompasses all use cases?

IBHS Wildfire Prepared Homes comes closest to encompassing all use cases in my opinion.

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☒ No

☐ Yes

☐ Other, please list

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☒ No

☐ Yes

☐ Other, please list

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a

national recognized science-based, wildfire mitigation standard(s)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a

formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

- ☐ No
- ☒ Yes
- ☐ Other, please list

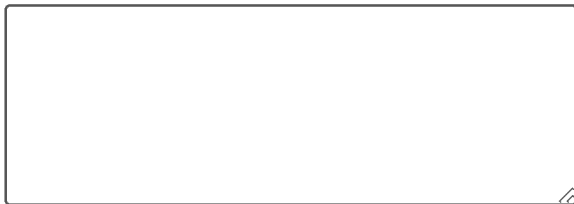
10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

- ☐ No
- ☒ Yes
- ☐ Other, please list

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with

accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No
- ☒ Yes
- ☐ Other, please list



12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

- ☐ No
- ☒ Yes
- ☐ Other, please list



13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

- ☒ No
- ☐ Yes
- ☐ Other, please list



. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with

the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☒ No
- ☐ Yes
- ☐ Other, please list



15. If yes, what information should be included to the consumer: (please click all that apply)

*This question was not displayed to the respondent.*

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

*This question was not displayed to the respondent.*

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☒ Yes

☐ Other, please list

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

☐ No

☒ Yes

☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

The grant program administrator should work with local fire districts to encourage them to promote the program locally.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

Name:

Brian Allen

E-mail Address:

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

As established in statute (RCW 76.04.005), the Washington Department of Natural Resources provides wildfire protection over "Department protected lands" meaning all lands subject to the forest protection assessment under RCW 76.04.610 or covered under contract or agreement pursuant to RCW 76.04.135 by the department. "Department protected lands" includes over 13 million acres of undeveloped non-federal forestland including state and private forestlands across the state.

DNR jurisdiction of "Department protected lands" covers wildland fires, which are uncontrolled fires on forestland subject to the forest protection assessment under RCW 76.04.610. DNR often responds to wildland fires burning on department protected lands within the wildland urban interface (WUI) however, DNR does not have jurisdiction or authority to respond to structural fires. DNR's jurisdictional boundaries for wildland fire response efforts end where forestland meets the built environment in communities.

Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☒ No

☐ Yes

☐ Other, please list

2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☒ Yes

☐ Other, please list

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☐ Yes

☒ Other, please list

The mitigation standards should include those who respond to fires in the built environment plus those who are tasked with responding to wildfires and those with experience in this space. These forces already have to partner together in responding to wildfires.

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

☐ No

☐ Yes

☒ Other, please list

I would recommend having the DNR's Wildfire Ready Neighbors campaign built out to include discussion of IBHS standards to fully promote wildfire readiness.

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

☐ No

☒ Yes

☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

☐ No

☒ Yes

☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

☐ No

☒ Yes

☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

☐ No

☐ Yes

☒ Other, please list

This type of sharing would be nice but may not be prioritized if cross agency coordination is required. The Natural Hazards Data Portal should be as a resource for those deemed responsible for enacting the policy framework. This can ensure that any developments and advancements in wildfire data tracking can be incorporated on a faster basis. This should include development of access point for local fire protection districts so they can review the wildfire related data in the portal with the understanding that the wildfire-related data only reflects one piece and is not the sole wildfire risk data source used by the state and other entities.

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

*This question was not displayed to the respondent.*

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

☐ No

☐ Yes

☒ Other, please list

This may create conflict as opinions differ between assessors in the public and private business space. Any creation of this information should be for the public only and not be a requirement for private industry use given the advancement of technology already in use by private industry players.

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

☐ No

☒ Yes

☐ Other, please list



13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

☒ No

☐ Yes

☐ Other, please list



. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Giving consumers the ability to understand reasons as to the impact of wildfire on their eligibility and insurance costs has been required by other states. Lessons learned from these endeavors would be ensuring the information is understandable by the consumer and understanding that mitigation action is encouraged but may not lead to a change in the scoring criteria that would cause a change in eligibility or pricing. Consumers may be better served by learning more about opportunities to obtain mitigation guidance and funding. Notices, if required, should not be sent on all renewals that have not had their eligibility or pricing impacted by wildfire scoring.

15. If yes, what information should be included to the consumer: (please click all that apply)

*This question was not displayed to the respondent.*

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

*This question was not displayed to the respondent.*

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☒ Yes
- ☐ Other, please list

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

Local fire districts are the trusted voice of communities that face wildfire exposure. Not having them collaborate in the program could lead to distrust in the administration of the program and a lower uptake rate for available funds.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

Name:

Senator Shelly Short

E-mail Address:

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

As established in statute (RCW 76.04.005), the Washington Department of Natural Resources provides wildfire protection over "Department protected lands" meaning all lands subject to the forest protection assessment under RCW 76.04.610 or covered under contract or agreement pursuant to RCW 76.04.135 by the department. "Department protected lands" includes over 13 million acres of undeveloped non-federal forestland including state and private forestlands across the state.

DNR jurisdiction of "Department protected lands" covers wildland fires, which are uncontrolled fires on forestland subject to the forest protection assessment under RCW 76.04.610. DNR often responds to wildland fires burning on department protected lands within the wildland urban interface (WUI) however, DNR does not have jurisdiction or authority to respond to structural fires. DNR's jurisdictional boundaries for wildland fire response efforts end where forestland meets the built environment in communities.

Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☐ No

☐ Yes

☒ Other, please list

I believe a single mitigation standard would not address the differences in the urban and rural environments. Any policies that are to be considered should reflect the unique nature of each.

2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☐ Yes

☒ Other, please list

No. However I believe that the Firewise USA for community engagement is a program I believe is useful to use. I do not support programs that create more code layers that continue frustrate home ownership.

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☒ No

☐ Yes

☐ Other, please list

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

☐ No

☐ Yes

☒ Other, please list

I think that consultation standards are the most important if we are to strive to get key information to communities and landowners.

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

☐ No

☐ Yes

☒ Other, please list

Yes, as long as the full funding does not undermine other investments within HB 1168.

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

☐ No

☐ Yes

☒ Other, please list

Yes, again if the funding is in addition to the existing components within HB 1168. I would not support funding that would take away from 1168.

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

☐ No

☒ Yes

☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

☐ No

☐ Yes

☒ Other, please list

No. I believe that the State Fire Marshal's Office may be the appropriate venue for that data sharing especially for access by local fire protection districts

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

*This question was not displayed to the respondent.*

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

☐ No

☐ Yes

☒ Other, please list

Maybe? However, my initial caution would be how would property owners at the parcel level interface with the entity compiling the same, especially if disagreed with the findings?

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Yes, as long as the information remains protected and put together in the aggregate for a particular area.

13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and**

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☒ Yes

☐ Other, please list



15. If yes, what information should be included to the consumer: (please click all that apply)

- ☒ Name of model used to determine the wildfire risk score.
- ☒ The date the wildfire risk score was generated.
- ☒ The range of scores available in the risk score model.
- ☒ The range of scores that determine insurance eligibility for the insurance company.
- ☒ What mitigation measures the consumer could carry out to improve the score and become eligible for insurance.

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

- ☐ By request from consumer
- ☒ Automatically provided when wildfire risk scores are used.

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☒ No
- ☐ Yes

☐ Other, please list

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

Grants should be focused for entities that have existing structures in our state (i.e. Firewise, DNR, etc.). Conservation Districts are key partners in rural areas especially in education and recommendations to assist landowners with vegetation management which is a key component of protecting homes.

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

☐ No

☒ Yes

☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

Establishing formal check ins with local fire districts would be most beneficial, especially in the development of whatever program is used in a specific community or county. They are a critical resource of information.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

Name:

Robyn Whitney

E-mail Address:

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

As established in statute (RCW 76.04.005), the Washington Department of Natural Resources provides wildfire protection over "Department protected lands" meaning all lands subject to the forest protection assessment under RCW 76.04.610 or covered under contract or agreement pursuant to RCW 76.04.135 by the department. "Department protected lands" includes over 13 million acres of undeveloped non-federal forestland including state and private forestlands across the state.

DNR jurisdiction of "Department protected lands" covers wildland fires, which are uncontrolled fires on forestland subject to the forest protection assessment under RCW 76.04.610. DNR often responds to wildland fires burning on department protected lands within the wildland urban interface (WUI) however, DNR does not have jurisdiction or authority to respond to structural fires. DNR's jurisdictional boundaries for wildland fire response efforts end where forestland meets the built environment in communities.

Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☒ No

☐ Yes

☐ Other, please list

2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☐ Yes

☒ Other, please list

DNR supports the adoption of the IBHS Wildfire Prepared Home Standard for insurability of dwellings. DNR is promoting FIREWISE USA Sites through its Community Resilience program as a reinforcing effort to IBHS. IWUI Code is already in RCW 19.27.560

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☐ Yes

☒ Other, please list

Adoption of a single property mitigation standard (e.g. IBHS) could be a joint venture led by WA State Fire Marshal's Office, with support from WA DNR and input from the OIC.

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

☐ No

☐ Yes

☒ Other, please list

Expanding and supporting the work of DNRs Community Resilience Program helps drive a multi-pronged approach combining financial and technical assistance to homeowners and communities, outreach and education, as well as community wide collaborative planning. DNRs Community Resilience Program supports collaborative planning and partnerships across jurisdictions by providing guidance in the development of Community Wildfire Protection Plans (CWPPs) and promoting Firewise USA Sites - a national program providing a framework for communities to work together to protect their homes and neighborhoods from wildfire. Statewide adoption of the IBHS Wildfire Prepared Home Standard will create consistent implementation of various efforts which are already closely aligned. DNR promotes national standards with its Community Resilience/Wildfire Ready Neighbors program including the IBHS Wildfire Prepared Home Standard.

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☒ Yes

☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

☐ No

☒ Yes

☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

☐ No

☐ Yes

☒ Other, please list

DNR currently spends taxpayer dollars on open access public portals for wildfire hazard and risk mitigation, therefore the department is not able to provide additional financial support to WaTech to house existing DNR data. Using multiple sites storing the same data is duplicative and not a good use of taxpayer dollars. We do recommend WaTech consider linking to and using DNR's open access public portals.

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

*This question was not displayed to the respondent.*

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No
- ☐ Yes
- ☒ Other, please list

ESB 6120 has directed the DNR to work with the State Fire Marshal to develop a base level map for hazard and risk for the state. Given DNR's jurisdiction and capacity, the Department focuses on assessment, mapping and mitigation of wildland fire "hazard" at the landscape and community level. We recommend coordinating hazard and risk mapping with this ongoing effort, as a joint effort of DNR, the State Fire Marshal, and the OIC. We see a need for and support using other sources of data and analytics to improve "risk" mapping at the parcel level but recommend coordinating it through the ongoing ESB 6120 directed mapping work.

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

- ☐ No
- ☐ Yes

☒ Other, please list

The Washington Wildland Fire Protection 10-Year Strategic Plan and the 5-Year Review of the Plan recently completed by the Wildland Fire Advisory Committee identify this as a high priority information and planning need. Legislative direction and support for improving the standardization, collection, reporting and dissemination of this information would be very valuable for planning and direction resources to areas where more work is needed as well as highlighting where work has been done and can be leveraged for providing better fire protection DNR has an interactive online platform that gathers and displays forest health project information across all lands in Washington that facilitates strategic cross-boundary planning, implementation, and monitoring of forests. Not all forest health project information can be displayed on this website, such as data associated with privacy restrictions. So, in addition to this website, DNR maintains a comprehensive forest health treatment tracking database that is utilized for routine progress reporting on forest health strategic plan goals. Increasing forest health and resiliency across all-lands in Washington is a highly collaborative effort, requiring coordination amongst individuals and organizations across the state. The evolving data displayed in this website across local, state, federal, tribal, and private land ownership is a reflection of that collaboration and commitment. Additionally, the National Association of State Foresters has launched a new Grant Accomplishment Reporting Portal (GARP) which serves as an accomplishments data repository to communicate and quantify the collective investments being made by state forestry agencies like WA DNR, nationwide under US Forest Service Cooperative Fire grants.

13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

☐ No

☐ Yes

☒ Other, please list

This is outside of DNRs expertise.

**. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and**

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

☐ No

☐ Yes

☒ Other, please list

This is outside DNRs area of expertise.

15. If yes, what information should be included to the consumer: (please click all that apply)

*This question was not displayed to the respondent.*

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

*This question was not displayed to the respondent.*

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

**(i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**

**(ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☐ Yes
- ☒ Other, please list

The IBHS Wildfire Prepared Home standard should be used as the framework for the grant program because it translates the latest wildfire research into actionable, science-based mitigation steps that homeowners can take to significantly reduce their home's risk of ignition from wind-driven embers and direct heat, and is the only property mitigation standard recognized by the insurance industry and therefore is more likely to result in improved access to insurance for homeowners.

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

Local fire districts should participate in the scoring for proposals and evaluating applications received in their local area. Grants should be prioritized with the following considerations: A) DNR Hazard Map (identify hazard threshold where grants would be prioritized) B) Areas where access to insurance due to wildfire is a problem C) Communities with updated CWPPs D) Use of the Health Disparities Mapping tool and tools for identifying and prioritizing underserved communities. Low income and traditionally underserved communities are frequently those most vulnerable and at risk to wildland fire and have historically been excluded from wildland fire mitigation assistance because of their inability to provide matching funds and a general lack of capacity and service providers in their communities. A mitigation grant program should correct for this issue and prioritize providing assistance to these areas to address the existing inequities around wildland fire mitigation efforts. Limit grant funding to the home and curtilage. Curtilage is the immediate area surrounding a home, such as a yard, porch, or driveway, that is considered an extension of the home itself. A greater investment by the legislature to support a new grant program is needed to achieve the levels of risk reduction desired.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

Name:

Michael DeLong

E-mail Address:

[REDACTED]

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

As established in statute (RCW 76.04.005), the Washington Department of Natural Resources provides wildfire protection over "Department protected lands" meaning all lands subject to the forest protection assessment under RCW 76.04.610 or covered under contract or agreement pursuant to RCW 76.04.135 by the department. "Department protected lands" includes over 13 million acres of undeveloped non-federal forestland including state and private forestlands across the state.

DNR jurisdiction of "Department protected lands" covers wildland fires, which are uncontrolled fires on forestland subject to the forest protection assessment under RCW 76.04.610. DNR often responds to wildland fires burning on department protected lands within the wildland urban interface (WUI) however, DNR does not have jurisdiction or authority to respond to structural fires. DNR's jurisdictional boundaries for wildland fire response efforts end where forestland meets the built environment in communities.

Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

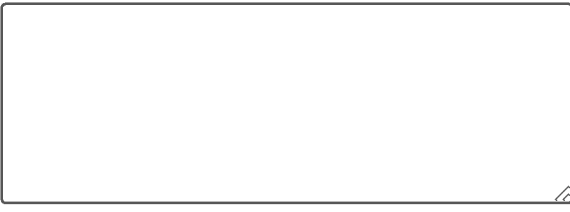
The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☒ No

☐ Yes

☐ Other, please list



2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☒ Yes

☐ Other, please list



4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☒ Yes

☐ Other, please list



5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

☐ No

☒ Yes

☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

☐ No

☒ Yes

☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

☐ No

☒ Yes

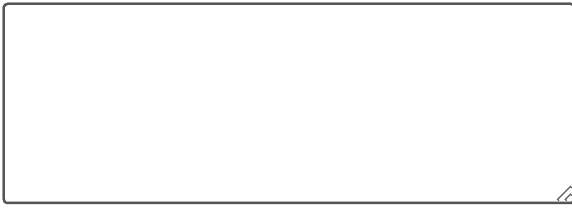
☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

☐ No

☒ Yes

☐ Other, please list



**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

☐ No

☒ Yes

☐ Other, please list



10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

☐ No

☒ Yes

☐ Other, please list



11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

☒ No

☐ Yes

☐ Other, please list



12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

☐ No

☒ Yes

☐ Other, please list



13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

☐ No

☒ Yes

☐ Other, please list



. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☒ Yes
- ☐ Other, please list

15. If yes, what information should be included to the consumer: (please click all that apply)

- ☒ Name of model used to determine the wildfire risk score.
- ☒ The date the wildfire risk score was generated.
- ☒ The range of scores available in the risk score model.
- ☒ The range of scores that determine insurance eligibility for the insurance company.
- ☒ What mitigation measures the consumer could carry out to improve the score and become eligible for insurance.

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

- ☐ By request from consumer
- ☒ Automatically provided when wildfire risk scores are used.

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☒ Yes
- ☐ Other, please list

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

I am not an expert in this field, but the grant program administrator should work closely with local fire districts on reducing risk, promoting mitigation, and conducting studies/field tests on how grants can best reduce wildfire risk and lower insurance costs. They should also exchange information on a regular basis, and develop some way of accurately measuring the impact of the grants.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

Name:

Eli King

E-mail Address:

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

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Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☐ No

☐ Yes

☒ Other, please list

Because the risks are different based on the geography and landscape across the state trying to have a single standard will be challenging and this could have unintended impacts to other sectors such as the energy sector for their utility wildfire mitigation plans. If DNR could provide an assessment based on levels of risk for regions within the state and then develop property risk mitigation standards for a region that would help address the different risk levels across the state.

2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☐ Yes

☒ Other, please list

Recommend doing this based on region and geography not necessarily the user.

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☐ Yes

☒ Other, please list

This should be a collaborative effort given the current structure within the state, DNR for wildlands and SFMO and fire depts for structure fires and the coordination for issues in the WUI

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☐ Yes
- ☒ Other, please list

recommend restoring the funding

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Yes but the scope would need to be specific on what data would be included. As this could have unintended consequences for the energy sector and protecting critical energy infrastructure information.

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

*This question was not displayed to the respondent.*

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No
- ☒ Yes

☐ Other, please list



12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

☐ No

☒ Yes

☐ Other, please list



13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

☐ No

☒ Yes

☐ Other, please list



. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☒ Yes
- ☐ Other, please list

15. If yes, what information should be included to the consumer: (please click all that apply)

- ☒ Name of model used to determine the wildfire risk score.
- ☒ The date the wildfire risk score was generated.
- ☒ The range of scores available in the risk score model.
- ☒ The range of scores that determine insurance eligibility for the insurance company.
- ☒ What mitigation measures the consumer could carry out to improve the score and become eligible for insurance.

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

- ☐ By request from consumer
- ☒ Automatically provided when wildfire risk scores are used.

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☒ Yes
- ☐ Other, please list

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

working with SFMO to have a better understanding of how to get all of the local fire districts together would be helpful and might support getting proactive engagement.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

*Instructions.* Please complete the following survey by the end of the day September 24th. If you have any questions, please reach out to [datacall@oic.wa.gov](mailto:datacall@oic.wa.gov).

. Contact Information

Name:

Mary Hull-Drury

E-mail Address:

[REDACTED]

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

As established in statute (RCW 76.04.005), the Washington Department of Natural Resources provides wildfire protection over "Department protected lands" meaning all lands subject to the forest protection assessment under RCW 76.04.610 or covered under contract or agreement pursuant to RCW 76.04.135 by the department. "Department protected lands" includes over 13 million acres of undeveloped non-federal forestland including state and private forestlands across the state.

DNR jurisdiction of "Department protected lands" covers wildland fires, which are uncontrolled fires on forestland subject to the forest protection assessment under RCW 76.04.610. DNR often responds to wildland fires burning on department protected lands within the wildland urban interface (WUI) however, DNR does not have jurisdiction or authority to respond to structural fires. DNR's jurisdictional boundaries for wildland fire response efforts end where forestland meets the built environment in communities.

Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☒ No

☐ Yes

☐ Other, please list

2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☒ Yes

☐ Other, please list

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☐ Yes

☒ Other, please list

Not sure, there are likely capacity variables amongst the varying groups who respond to fires.

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

☐ No

☒ Yes

☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

☐ No

☐ Yes

☒ Other, please list

That depends on the funding source and its overall impact.

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

☐ No

☐ Yes

☒ Other, please list

Same response as #6: That depends on the funding source and its overall impact.

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

☒ No

☐ Yes

☐ Other, please list



**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

☐ No

☒ Yes

☐ Other, please list



10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

☐ No

☒ Yes

☐ Other, please list



11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

☐ No

☒ Yes

☐ Other, please list



12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

☐ No

☒ Yes

☐ Other, please list



13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

☐ No

☒ Yes

☐ Other, please list



. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☒ Yes
- ☐ Other, please list

15. If yes, what information should be included to the consumer: (please click all that apply)

- ☒ Name of model used to determine the wildfire risk score.
- ☒ The date the wildfire risk score was generated.
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- ☒ The range of scores that determine insurance eligibility for the insurance company.
- ☒ What mitigation measures the consumer could carry out to improve the score and become eligible for insurance.

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- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☒ Yes
- ☐ Other, please list

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

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. Contact Information

Name:

Kenton Brine

E-mail Address:

[REDACTED]

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

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DNR jurisdiction of "Department protected lands" covers wildland fires, which are uncontrolled fires on forestland subject to the forest protection assessment under RCW 76.04.610. DNR often responds to wildland fires burning on department protected lands within the wildland urban interface (WUI) however, DNR does not have jurisdiction or authority to respond to structural fires. DNR's jurisdictional boundaries for wildland fire response efforts end where forestland meets the built environment in communities.

Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☐ No

☐ Yes

☒ Other, please list

This seems like a challenging way to establish risk mitigation standards. And there are likely to be environmental protection ordinances and commercial vs. residential construction variations that will require some flexibility. I lean "no" on this question, but need more information about how a single risk mitigation standard would interact with commercial vs. residential construction and potential environmental impacts. Further, it may make sense to establish a single risk mitigation standard, but exclusively as a determinant factor in qualifying a property for risk mitigation grants (but not necessarily for other purposes, ie: commercial building codes).

2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☐ Yes

☒ Other, please list

This makes more sense as an approach, though I would add that there may be other existing mitigation standards - for example, the IBHS Wildfire Prepared Neighborhood program - that should be considered for community engagement opportunities.

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☐ Yes

☒ Other, please list

The development of parcel-level and community mitigation should be informed by responders, but must also consider input from a variety of interested/experienced parties. Enforcement/incentivization should rely on collaborative and community-informed engagement by local leaders, including fire, emergency management and building officials.

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

☐ No

☒ Yes

☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

☐ No

☒ Yes

☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Yes, but data sharing should ultimately also be connected with regional and/or nationwide efforts to gather and share data to update wildfire science and to provide new information about the status, growth and success of parcel and community-level mitigation. An example of this is the Milliman-led Data Commons project.

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

*This question was not displayed to the respondent.*

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No
- ☐ Yes
- ☒ Other, please list

Any recommendation related to providing risk assessment data should be limited to creating and updating risk assessments for use exclusively by public entities. Private industry has responded to the need for reliable catastrophe models and wildfire risk scores that are competitive and dynamic. The use of those models and risk scores works to the benefit of insurance consumers, by providing accurate, reliable information to insurers, who can then write policies with relative confidence, which encourages market stability. No recommendation from this work group should be made to the Legislature that supplants or interferes with the continued development of competing models or risk scores developed by private industry sources.

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

- ☐ No
- ☒ Yes
- ☐ Other, please list

13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

- ☒ No
- ☐ Yes
- ☐ Other, please list

**. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and**

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☐ Yes
- ☒ Other, please list

In some states, insurers are required under statute to provide information about wildfire risk scores, but only to insureds who have either received a nonrenewal notice or have been notified of a premium increase that is materially related to wildfire risk. The wording of question 14 implies that wildfire risk scores should be disclosed more broadly if used in any way in underwriting/rating. As written, I would not support this recommendation.

15. If yes, what information should be included to the consumer: (please click all that apply)

*This question was not displayed to the respondent.*

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

*This question was not displayed to the respondent.*

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and**

**evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☒ Yes
- ☐ Other, please list

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

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19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

A grant program designed to aid in implementing a parcel-level and community-level mitigation effort on a statewide basis must be informed in part by people in the affected communities. A grant program administrator should work with interested parties to develop pathways for two-way communication between that program and those parties, including early, regular and ongoing communication that seeks input from local fire districts. The input should be jointly developed and predetermined, so that fire district personnel know what information to provide and update. And the information should be intended to help the program administrator prioritize the parcels and/or communities that will receive grant funding (based on science-based as well as equity-based data).

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

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. Contact Information

Name:

JulieAnna Anastassatos

E-mail Address:

- . First series of recommendations:
- (a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

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Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

- ☐ No
- ☐ Yes

☒ Other, please list

Using a science-based approach is definitely important but there are several paradigms that support such approach including, for example IBHS Wildfire Prepare Home, MIST HMM, and the International WUI code.

2. If yes, which standard encompasses all use cases?

*This question was not displayed to the respondent.*

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☐ Yes

☒ Other, please list

While there needs to be alignment across the use cases, there should not be a single standard because several standards exist that can accomplish the overall purpose. There should be coordination between the various stakeholders. It remains important to have different viewpoints represented in this discussion, as well as recognition of each of the science-based viewpoints for each of these use cases.

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☐ Yes

☒ Other, please list

While the technical development of the standard may be housed within the appropriate government entity that responds to fires, additional stakeholder voices should be included in the development process to support alignment for the other important use cases.

5. Should a recommendation include expanding DNR’s Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a national recognized science-based, wildfire mitigation standard(s)?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Whether it’s the Department of Natural Resources’ (DNR) program or another state entity, one state agency should be responsible in order to facilitate consistent messaging for those who seek to undertake efforts that will be recognized by the various stakeholders discussed above.

. (b) Enhancing wildfire mitigation at the community level;

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

- ☐ No
- ☐ Yes
- ☒ Other, please list

N/A

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☐ Yes

☒ Other, please list

N/A

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

☐ No

☐ Yes

☒ Other, please list

It is important to establish a formal policy framework to facilitate consistency and coordination across all local and statewide community groups so that there is a full understanding of mitigations that matter and that are recognized by insurance modelers and insurers.

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

☐ No

☐ Yes

☒ Other, please list

Having access to reliable, current and robust data is crucial.

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for

local fire protection districts so they can review the wildfire related data in the portal?

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11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No
- ☐ Yes
- ☒ Other, please list

Washington insurance consumers can benefit from the insurance industry having access to multiple wildfire hazard and risk models. Many insurers take a multi-model approach which allows them to gain more comfort in confidently underwriting and pricing their risk from wildfire. If a state tool is developed, it is important that the ability for insurers to utilize multiple tools be preserved in order to promote a robust insurance market.

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

- ☐ No
- ☐ Yes
- ☒ Other, please list

Yes, having access to reliable, current and robust data is crucial.

13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

- ☐ No

☐ Yes

☒ Other, please list

N/A

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14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

☐ No

☐ Yes

☒ Other, please list

N/A

15. If yes, what information should be included to the consumer: (please click all that apply)

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*This question was not displayed to the respondent.*

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- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.

17. We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.

The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?

- ☐ No
- ☐ Yes
- ☒ Other, please list

N/A

18. If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?

*This question was not displayed to the respondent.*

19. In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator.

Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☐ Yes
- ☒ Other, please list

N/A

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

*This question was not displayed to the respondent.*

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

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. Contact Information

Name:

Michael DeLong

E-mail Address:

[REDACTED]

. First series of recommendations:

**(a)(i) Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards;**

As established in statute (RCW 76.04.005), the Washington Department of Natural Resources provides wildfire protection over "Department protected lands" meaning all lands subject to the forest protection assessment under RCW 76.04.610 or covered under contract or agreement pursuant to RCW 76.04.135 by the department. "Department protected lands" includes over 13 million acres of undeveloped non-federal forestland including state and private forestlands across the state.

DNR jurisdiction of "Department protected lands" covers wildland fires, which are uncontrolled fires on forestland subject to the forest protection assessment under RCW 76.04.610. DNR often responds to wildland fires burning on department protected lands within the wildland urban interface (WUI) however, DNR does not have jurisdiction or authority to respond to structural fires. DNR's jurisdictional boundaries for wildland fire response efforts end where forestland meets the built environment in communities.

Local fire districts have jurisdiction, authority, and statutory requirements for responding to fires within communities and the built environment.

The intent of the legislature is to solicit recommendations that would increase the availability of insurance, decrease nonrenewals and enhance stability in the property insurance market. In this context, we assume "property" refers to insurable structures in the built environment and applicable mitigation standards

1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☐ No

☒ Yes

☐ Other, please list

2. If yes, which standard encompasses all use cases?

I am not an expert, but IBHS's Wildfire Prepared Home Standard seems to be closest.

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☒ Yes

☐ Other, please list

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☒ No

☐ Yes

☐ Other, please list

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a

national recognized science-based, wildfire mitigation standard(s)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (b) Enhancing wildfire mitigation at the community level;**

We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

- ☐ No
- ☒ Yes
- ☐ Other, please list

7. Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a

formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

- ☐ No
- ☒ Yes
- ☐ Other, please list

**. (c) Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map;**

9. Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?

- ☐ No
- ☒ Yes
- ☐ Other, please list

10. If yes, should a recommendation include the legislature directing WaTech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal?

- ☐ No
- ☒ Yes
- ☐ Other, please list

11. Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with

accurate and up to date wildfire hazard and risk assessments at the parcel level:

- ☐ No
- ☒ Yes
- ☐ Other, please list

12. Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?

- ☐ No
- ☒ Yes
- ☐ Other, please list

13. Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk.

Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

- ☐ No
- ☒ Yes
- ☐ Other, please list

. (d) Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with

the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data; and

14. Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?

- ☐ No
- ☒ Yes
- ☐ Other, please list

15. If yes, what information should be included to the consumer: (please click all that apply)

- ☒ Name of model used to determine the wildfire risk score.
- ☒ The date the wildfire risk score was generated.
- ☒ The range of scores available in the risk score model.
- ☒ The range of scores that determine insurance eligibility for the insurance company.
- ☒ What mitigation measures the consumer could carry out to improve the score and become eligible for insurance.

16. Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?

- ☐ By request from consumer
- ☒ Automatically provided when wildfire risk scores are used.

**. (e) Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:**

- (i) A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and**
- (ii) Whether and how local fire protection districts may collaborate with the grant program administrator.**

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considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.

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Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

I am not an expert on this, but they should quickly and easily exchange information, and have concrete data on mitigation measures and the discounts that result from them.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.

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. Contact Information

Name:

Chandra Fox

E-mail Address:

[REDACTED]

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1. Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?

☐ No

☒ Yes

☐ Other, please list

2. If yes, which standard encompasses all use cases?

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☒ No

☐ Yes

☐ Other, please list

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☐ Yes

☒ Other, please list

It has to be a collaborative process

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a

national recognized science-based, wildfire mitigation standard(s)?

- ☐ No
- ☒ Yes
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We have heard many of the efforts being made at the community level are negatively impacted by the lack of funding for community wildfire resilience investments as part of the wildfire response, forest restoration, and community resilience account. (HB 1168)

6. Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?

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- ☐ No
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8. We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a

formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?

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accurate and up to date wildfire hazard and risk assessments at the parcel level:

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Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested:

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- ☐ No
- ☒ Yes
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Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

Existing coalitions should be leveraged, development of new coalitions should be encouraged, and where possible, the grant program administrator should be embedded in the coalition to ensure direct relationship and coordination with fire districts.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

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. Contact Information

Name:

Mark Donnell

E-mail Address:

[REDACTED]

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☐ No

☒ Yes

☐ Other, please list

2. If yes, which standard encompasses all use cases?

The Institute for Business and Home Safety Wildfire Prepared Home and Neighborhood standard provides actionable and verifiable information that can be integrated into risk planning and underwriting ecosystems. I would also recommend adoption of the Wildland Urban Interface building code to provide additional validation of a uniformed standard.

3. Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?

☐ No

☐ Yes

☒ Other, please list

I believe that a single standard would be easier to implement and understand. Curenly there are many organizations with similar approaches to wildfire risk mitigation which often confuses property owners.

4. Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?

☐ No

☒ Yes

☐ Other, please list

5. Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a

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Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?

- ☐ No
- ☒ Yes
- ☐ Other, please list

20. If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?

The program administrator can easily use the resources provided by the memberships of both the Washington Fire Chiefs and Washington Fire Commissioners Association. The challenge will be on a fire districts ability to implement and/or enforce wildfire mitigation due to their available staffing and funding. With current economic situation this will be extremely challenging.

21. If no, please provide a rationale for not collaborating with local fire protection districts.

*This question was not displayed to the respondent.*

. Please click the 'Submit' button to submit the survey responses.



# Resources Legacy Fund®

## MEMO

To: David Forte, Office of the Insurance Commissioner and Robyn Whitney, Washington Department of Natural Resources

From: Hilary Lundgren, Resources Legacy Fund / [hlundgren@resourceslegacyfund.org](mailto:hlundgren@resourceslegacyfund.org)

Date: September 24, 2025 and updated October 10, 2025

Re: Wildfire Mitigation and Resiliency Standards Work Group Survey Responses

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Thank you for the opportunity to provide input on the critical recommendations required by SHB 1539 (2025). I appreciate the working group's dedication throughout this process and its collaborative effort in developing wildfire mitigation strategies recommendations for Washington State. The following responses reflect my survey input and expand on key considerations for developing effective, science-based wildfire risk mitigation standards and programs that can serve our diverse communities and stakeholders.

## SUMMARY OF RECOMMENDATIONS

### A. Coordinating State Standards with Nationally Recognized Standards:

- Adopt a layered approach with minimum building standards while allowing specialized frameworks to address specific domains rather than forcing all uses into a single standard.
- Consider adopting additional provisions that include expanded structure hardening requirements (Class A roofs, vent covers, etc.), voluntary performance-based and professional reliance-based defensible space standards that account for Washington's diverse geographic regions and ecotypes, enhanced structure ignition zone standards (like removing combustible materials within five feet of structures), and improved fire protection requirements covering emergency access and water supply.
- Adopt multiple scientifically-proven approaches that combine mandatory requirements, voluntary programs, and guidance, with complementary tracking systems to monitor effectiveness over time.
- Structural and building standards should fall under the authority of the Washington State Fire Marshal's Office, as it has the regulatory authority for fire safety in the built environment.

- Establish guidance before expanding programs. First, develop structural ignition zone and defensible space guidance through multi-stakeholder advisory group. Follow-up with program design or reform based on that guidance to ensure program approaches, resources, technical assistance, outreach, and mitigation efforts, and state requirements, align with the guidance -- rather than expanding existing programs that may not reflect current science-based and state standards.
- Develop a set of key terms and definitions adopted by the State to ensure consistency in application across agencies and alignment with current industry-accepted terms. Ensure key terms in any new codes, programs, and guidance align with terminology.

#### B. Enhancing Community-Level Wildfire Mitigation:

- Restore full funding (\$60 million supplemental appropriation) during the 2026 legislative session to the Wildfire Response, Forest Restoration, and Community Resilience Account *with a guaranteed 15% allocation to community resilience programs*
- Implement existing policy frameworks from Washington's Wildland Fire Protection Strategic Plan, specifically establishing regional wildfire preparedness and risk mitigation coordination groups and capacity.
  - Invest in coordinator capacity outside state agencies to complement state regional coordination capacity and leverage diverse funding sources and ensure program continuity beyond state budget cycles
- Support community planning capacity by providing comprehensive training for city and county planners on wildfire hazard assessment, structure ignitability, codes and ordinances, fire behavior, and how planning decisions impact wildfire response, enabling integration of wildfire considerations into routine land use planning processes.

#### C. Data Sharing Between Agencies and Insurance Industry:

- Recommend conducting further research and analysis before developing a policy framework for cross-agency mitigation data sharing. This research needs to establish the specific use and purpose of shared wildfire hazard and risk mitigation data, clarify how decision-makers across different agencies will utilize this information, determine what data should be publicly available, and ensure full transparency for public access and accountability.
- Partner with academic researchers who have developed voluntary parcel-level vulnerability models that empower residents to see and improve their structure survivability scores through completed mitigation actions.
- Establish resident-controlled information sharing with "opt-in/out" options for each entity, allowing property owners to determine what mitigation information gets shared with insurance providers and agencies.

#### D. Improving Consumer Transparency on Wildfire Risk:

- Require insurance companies to internally track when wildfire risk determines policy eligibility or cost, and automatically disclose wildfire risk scores when used for underwriting decisions.

- Mandate comprehensive disclosure including model name, score generation date, score ranges, eligibility thresholds, and specific mitigation measures consumers can implement to improve scores.
- Provide risk score information automatically on all relevant notices, when a risk score is used rather than only upon consumer request.

#### E. Establishing Homeowner Retrofit Grant Program:

- Implement grant program using IBHS Wildfire Prepared Home standards as voluntary framework with state funding to waive application and renewal fees, focusing only on the home certification (not the IBHS Wildfire Prepared Neighborhood program).
- Conduct asset and needs assessment to determine fire district capacity in supporting grant program administration. Consider an alternative approach to building county positions that provide training and administrative support for fire districts participating in grant programs.
- Align coordination capacity, assessments, and data collection and tracking goals and strategies outlined within the Washington Wildland Fire Strategic Plan frameworks to avoid creating redundant or conflicting approaches.
- Expand existing retrofit incentivization programs to include wildfire mitigation by building on established state “green”, weatherization, and utility partner frameworks that consumers already know and use, leveraging existing administrative capacity and overlapping measures like window replacement programs that can address both energy and wildfire standards.
- Provide funding for low- and moderate-income households to rebuild after a fire to wildfire-resistant standards.

## SURVEY RESPONSES

### A. Coordinating the department of natural resources' existing wildfire property mitigation standards, or development of standards, with nationally recognized, science-based, wildfire mitigation standards, and (ii) aligning state wildfire property mitigation standards with nationally recognized, science-based, wildfire mitigation standards

1. *Should the state attempt to develop and adopt a single wildfire property risk mitigation standard that is applicable for all uses? I.e., Insurance, building permits, environmental protection ordinances?*

**Recommendation: Layered Approach with Minimum Standards.** Instead of a single standard, building requirements should establish minimum standards to reduce home ignition potential (Class A roofs, vent covers, etc.) while allowing other regulatory and voluntary frameworks to address other specific domains (defensible space, vegetation management, insurance, environmental protection). This layered approach ensures coverage while avoiding the conflicts and gaps that would inevitably result from forcing all uses into a single standard.

**Different Tools Serve Different Purposes.** When examining wildfire mitigation approaches, it is important to understand what decision-makers are actually referencing. Codes and standards (like the International WUI Code, NFPA Fire Code Chapter 17, NFPA 1140, and Washington's RCWs and WACs) provide mandatory requirements developed by authoritative organizations. Programs (such as Wildfire Ready Neighbor, IBHS Wildfire Prepared Home, NFPA Firewise, and IBHS Wildfire Prepared Community) offer voluntary mitigation frameworks with their own technical requirements. Guidance documents consolidate best practices and recommendations into handbooks and guides for various scales from individual homes to entire communities. It is unclear whether this question aims to address codes and regulations, programs, or guidance.

**Each Approach Has Limitations.** Different codes, standards, and programs excel in specific areas but have gaps elsewhere. Some work well for individual home hardening but struggle with larger properties requiring customized vegetation management in extended zones. Others provide solid requirements for immediate structure protection but do not scale to neighborhoods or adapt to local conditions. One approach cannot provide comprehensive mitigation coverage. (See "Comparative Analysis of WUI Mitigation in Washington" report completed September 2025.)

**Potential Conflicts Between Regulatory Frameworks.** While building codes and environmental standards may align in some areas, conflicts inevitably arise due to varying planning, zoning, and land use requirements for environmental protection. For example, codes and regulations may require defensible space, which conflicts with tree preservation ordinances, viewshed requirements, or stormwater management requirements, potentially clashing with the need for vegetation removal for fire safety.

**Insurance Industry Considerations.** Although IBHS has established relationships with the insurance industry and gained buy-in on its home preparation standards, insurance companies can shift their focus, and decisions are based on economic factors. The state should prioritize mitigation actions grounded in science that demonstrate actual home survivability rather than aligning with for-profit industry standards. If the focus remains on specific, scientifically proven mitigation actions, the insurance industry should accept these measures regardless.

3. *Should the state attempt to develop and adopt multiple wildfire risk mitigation standards that are applicable to various individual use cases? I.e., The International Wildland Urban Interface building code for building officials, fire marshals and permitting purposes? The Insurance Institute for Business & Home Safety standards for insurability of dwellings? The FIREWISE USA for community engagement?*

See answers to question 1 above. The state should develop and adopt multiple scientifically proven strategic approaches that combine mitigation requirements, voluntary programs, guidance, and diverse engagement options. This strategy acknowledges that different situations require different tools – and applies a practical approach that considers Washington’s diverse geography, ecosystems, social, economic, and cultural needs and values.

**The Need for Proven Effectiveness.** While numerous codes, standards, programs, and resources have emerged recently, critical gaps remain in demonstrating their effectiveness in reducing wildfire risk over time as usage data and measurable outcomes from these programs remain largely undocumented. The "Comparative Analysis of WUI Mitigation in Washington" (Community Wildfire Planning Center, September 2025) report highlights this issue. If the state adopts specific codes, standards, programs, or guidance, it must simultaneously develop complementary tracking systems to monitor outcomes and demonstrate efficacy over time.

**Addressing Current Regulatory Gaps.** Refer to the "Comparative Analysis of WUI Mitigation in Washington" (Community Wildfire Planning Center, September 2025) report for findings and recommendations.

The state's current WUI Code has significant gaps that need attention. Consider adopting additional provisions that include expanded structure hardening requirements, voluntary performance-based and professional reliance-based defensible space standards that account for Washington's diverse geographic regions and ecotypes, enhanced structure ignition zone standards (like removing combustible materials within five feet of structures), and improved fire protection requirements covering emergency access and water supply.

**Expanding Engagement and Customization.** Explore ways for homeowners and communities to participate in community-scale mitigation efforts. This could include supporting local planning departments by developing Washington-specific guidance on wildfire mitigation best practices and creating opportunities to integrate wildfire considerations into local land use plans. State guidance can build on existing national WUI mitigation planning resources while customizing them for Washington's unique conditions and challenges.

### **IBHS Wildfire Prepared Home**

IBHS brings credibility to the field and focuses on structural recommendations, while its designation process helps ensure ongoing property maintenance. However, the program faces challenges related to costs and the complexity of the designation and redesignation processes. Additionally, the IBHS Prepared Neighborhood program lacks proven effectiveness as a model.

*Recommendations:* The state should adopt IBHS Wildfire Prepared Home as an optional voluntary program, providing funding support and reimbursement opportunities to waive

application and renewal fees. Insurance incentives should be available for participants who demonstrate completion of required mitigation actions.

### **FIREWISE USA®**

This program has shown success in well-organized communities with certain demographics and economic resources, effectively encouraging residents to coordinate projects and work collaboratively. However, it does not measure completed work or track the effectiveness of efforts undertaken. The program lacks minimum standards to ensure meaningful outcomes and has not proven adaptable across communities with diverse socio-economic backgrounds. It relies heavily on participants having available time and financial resources.

*Recommendations:* Continue using Firewise USA® as an educational tool and voluntary program, while recognizing its limitations in broader community applications.

### **Wildfire Ready Neighbors**

This program serves as an effective outreach and educational tool that should remain voluntary, if it is determined to be of value or create efficiencies in requesting and receiving wildfire risk home assessments. The program currently lacks follow-up mechanisms to ensure that recommended work is completed, and resources to support actual implementation of recommendations are not always available. Since homeowners select which work to complete, there's uncertainty about how mitigation actions are prioritized and whether the chosen actions represent the most effective risk reduction strategies.

*Recommendations:* The program needs expansion beyond its current scope and reform to provide ongoing value. It should be repositioned to facilitate the development of neighborhood and community-scale programs already operating in the state, such as Firewise USA®, Community Wildfire Ambassadors, or other locally developed community wildfire risk mitigation coordination initiatives. In addition, locally developed community wildfire risk coordination initiatives outside of voluntary state and federal programs (e.g., Firewise USA and Community Wildfire Ambassadors) should be acknowledged and incentivized, focusing on the actions being taken regardless of participation in state or national programs.

4. *Should the development of property (structure) and community mitigation standards fall within the appropriate government entities who respond to fires in the built environment?*

**Structural Standards:** Structural and building codes and standards for new construction or remodels should fall under the authority of the Washington State Fire Marshal's Office, as it has the regulatory authority for fire safety in the built environment.

More assessment and research is needed to determine which agency should be responsible for structural retrofits, vegetation removal, and community mitigation standards and guidance.

**Programs and Guidance:** The development of programs and guidance to facilitate the implementation of mitigation standards will require a more collaborative approach. Development should involve coordination among multiple agencies with specialized expertise in planning, wildfire response, outreach, engagement, and implementation. Key participating agencies should include the Washington Department of Emergency Management, Washington Fire Marshal's Office, Washington Building Code Council, Washington Department of Natural Resources, the Washington State University Extension, the Washington State Conservation Commission, and the Washington Department of Commerce.

*Consultation and Facilitation:* Guidance and programs should be developed in coordination with the Washington Fire Chiefs' Association, land-use planning entities, nonprofit organizations (such as the Washington Resource Conservation and Development Council, Latino Community Fund, and others), fire districts, NFPA, IBHS, the Washington Association of Counties, scientists and researchers, and community wildfire practitioners. To ensure balanced input and avoid agency-specific bias, the process should be facilitated by a neutral, non-governmental organization, such as the Northwest Fire Science Consortium or a similar entity.

This multi-agency, collaborative approach recognizes that effective wildfire mitigation spans multiple disciplines and jurisdictions, while ensuring that structural standards remain under appropriate authority and that broader programs benefit from diverse expertise and stakeholder input.

*Additional recommendation:* Develop a set of key terms and definitions adopted by the State to ensure consistency in application across agencies and alignment with current industry-accepted terms. Ensure key terms in any new codes, programs, and guidance align with terminology.

5. *Should a recommendation include expanding DNR's Wildfire Ready Neighbors program to support additional state-wide and locally coordinated campaigns to drive community engagement and adoption of a nationally recognized science-based, wildfire mitigation standard(s)?*

More assessment/research needed. Rather than simply expanding the existing Wildfire Ready Neighbors program, recommend establishing a coordinating entity as outlined in the multi-agency collaborative approach as identified in question #4. This coordinating body should prioritize developing guidance and subsequently create programs to support the implementation of that guidance.

The cross-jurisdictional coordinating entity would be better positioned to evaluate whether continuing, modifying, or replacing the Wildfire Ready Neighbors program makes the most sense for driving community engagement and adoption of nationally recognized, science-based, and state wildfire mitigation standards. This approach ensures that any program development is based on a thorough assessment of current gaps, community needs, and the most effective methods for achieving statewide adoption of proven mitigation practices.

**Program Development Following Guidance.** By developing guidance first through the collaborative process involving multiple agencies, stakeholders, and neutral facilitation, the state can then design programs—whether building on Wildfire Ready Neighbors or creating new initiatives—that are specifically tailored to implement that guidance effectively across diverse communities and local conditions.

This strategic sequence of guidance development followed by program design ensures that community engagement efforts are grounded in coordinated, science-based standards rather than expanding existing programs that may not align with the most effective mitigation approaches, state requirements, or potential guidance.

## B. Enhancing wildfire mitigation at the community level

6. *Should a recommendation include returning full funding to the community resilience investments portion of the wildfire response, forest restoration, and community resilience account (HB 1168)?*

Yes! Work to pass an appropriations bill by the end of the 2026 legislative session and is signed by the governor, which:

- Approves \$60 million supplemental appropriation to the Wildfire Response, Forest Restoration, and Community Resilience Account
- **Ensures DNR allocates 15% of total biennium funds to community resilience programs**
- Provides at least \$2.5 million for the State Conservation Commission forest health and community wildfire programs

7. *Should a recommendation include increasing the funding to support community mitigation efforts from the community wildfire resilience investments program?*

Yes. A strategy for this work is outlined in Washington's Wildland Fire Protection Strategic Plan. See Goal 2, Strategy 4 "Advance Sustainable Funding", which includes evaluating sustainable

and alternative funding mechanisms for wildfire resilience (S4.2) and convening a task force to develop and advance funding strategies (S4.3).

8. *We have heard of the good work of local and statewide community groups are doing in communities all across Washington state. Should a recommendation include building on existing efforts and to establish a formal policy framework that incentivizes and sustains local-level wildfire risk mitigation coordinating groups?*

A policy framework exists through the adoption and implementation of Washington’s Forest Health Strategic Plan and Wildland Fire Protection Strategic Plan:

| Wildland Fire Protection Strategic Plan                                                                                                                                                                                               |   | Forest Health Strategic Plan                                                                      |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---------------------------------------------------------------------------------------------------|
| <b>Goal 2</b> addresses resilient landscapes<br><br><b>Strategy #5</b> emphasizes accelerating the pace and scale of actions throughout Washington, including rangelands, western forests, and other areas not covered by FHSP.       | ↔ | <b>Goal 1:</b> Accelerate the pace and scale of treatments                                        |
| <b>Goal 3</b> supports and reinforces Goal 2 of the FHSP.<br><br><b>Strategy #2</b> deploys quantitative risk assessment to identify and focus work on priority communities and values at risk.                                       | ↔ | <b>Goal 2:</b> Strategically focus work to protect communities and values at risk.                |
| <b>Strategy #3</b> reinforces the need for a capable and qualified workforce.                                                                                                                                                         | ↔ | <b>Goal 3:</b> Promote rural economic development and use of restoration by-products.             |
| <b>This Plan</b> emphasizes the need for meaningful collaboration and coordination at multiple scales and across all jurisdictions.                                                                                                   | ↔ | <b>Goal 4:</b> Respect and integrate diverse landowner objectives.                                |
| Monitoring and adaptive management is incorporated throughout, particularly through the holistic planning and quantitative assessment in Strategy #2.<br><br>Metrics to measure progress are included in <i>Appendix E. Metrics</i> . | ↔ | <b>Goal 5:</b> Monitor progress and adapt strategies over time to ensure treatment effectiveness. |

See Goal 1, Strategy 1.3: “Establish Regional and Local Coordination Capacity”:

“A. Create regional coordination councils as a conduit to integrate community values into the programmatic activities related to risk management assessment, wildland fire planning, and response. Given the unique complexities that exist throughout the state, regional coordination councils should be created to ensure the integration of the best local

knowledge into these risk management and planning efforts. Regional coordinating councils may:

- Use a risk assessment process to identify communities at risk from catastrophic wildland fires as well as priority actions to mitigate those risks.
- Identify significant barriers to reducing risk from wildland fire.
- Provide geographic context and understanding to risk prioritization, including contributing local knowledge to the mapping of HVRAs, priority landscapes for restoration, WUI areas requiring fuel and vegetation management, and landscapes appropriate for prescribed or managed fire.”

“B. Establish a fire adapted community coordinator position in the highest-risk eastern Washington counties and at the regional scale elsewhere. Coordinators will connect land managers and individuals working on risk reduction activities primarily before and after response, while playing a supporting role in response as appropriate. Coordinators should:

- Support risk management assessment, wildland fire planning efforts, and program implementation at a relevant local scale that reflects the opportunities and challenges of different regions.
- Integrate local wildland fire mitigation efforts with the wildland fire risk mitigation elements of the FHSP (specifically Goal 2 of the FHSP).
- Connect at-risk residents, landowners, and communities to existing available resources.
- Support local coordination efforts by convening individuals, organizations, and stakeholders (e.g., to complete Community Wildfire Protection Plans [CWPPs] and pre-response plans)
- Exist within diverse agencies and organizations, but with a common position description. Coordinator positions can be offered as an incentive for local jurisdictions to coordinate wildland fire risk reduction in their respective areas (with no more than one position per county).
- Connect to each other through a professional network or association in order to facilitate sharing of practices and achieve consistency between jurisdictions and agencies.
- Be provided for all of Washington, so that, whether at the county or regional scale, all Washington communities have access to fire adapted community coordinators.”

**\*\*Strongly recommend investing in developing coordinator capacity at both the county and state regional levels. Coordination capacity outside of state agencies will enable organizations to leverage state, private, and federal funding and resources, ensuring the continuity of programs rather than being solely reliant on the state budget and restricted to state budget cycles.\*\***

See Goal 2, Strategy 3: “Enhance and Sustain a Highly Capable Workforce”

- Strategy 3.2: Increase capacity of the state’s wildland fire prevention, preparedness, and recovery workforce
- Strategy 3.3: Increase capacity of the state’s wildland fire treatment and response workforce.

See Goal 3, Strategy 6: “Communities are Prepared and Adapted for Current and Future Wildland Fire Regimes”

- Strategy 6.3: Increase capacity, coordination, and networking of community assistance programs, including:  
“D. Expand the Washington State Fire Adapted Communities Learning Network to include additional communities in diverse at-risk landscapes. Throughout the engagement process, stakeholders emphasized the need for an expanded WAFACLN. This finding was consistent with stakeholder input received during the 2016 Governor’s listening sessions.”

*Additional recommendation(s):*

**Support Community Planning for Wildfire Integration:** Develop comprehensive training and technical assistance programs for city and county planners to integrate wildfire considerations into local land use planning processes. This support should include education on wildfire hazard and risk assessment, structure ignitability factors, relevant codes and ordinances, fire behavior fundamentals, and how planning decisions and variances can impact wildfire response efforts. Planning departments need resources to understand defensible space requirements, evacuation route planning, development density considerations in high-risk areas, infrastructure resilience (water supply, road access), and how zoning decisions affect community wildfire vulnerability.

Training should also cover integration of wildfire mitigation into comprehensive plans, hazard mitigation plans, development regulations, and environmental review processes. This capacity building ensures that wildfire risk reduction becomes embedded in routine planning decisions rather than treated as a separate, specialized concern as communities continue to expand development within the wildland urban interface. Additionally, planners need tools to balance wildfire safety with other community values such as environmental protection, affordable housing, and economic development. State support should include developing planning guidance documents, model ordinances, technical assistance programs, and ongoing professional development opportunities that keep planners current with evolving wildfire science and mitigation strategies.

**C. Sharing of relevant data between appropriate state agencies and the insurance industry with respect to successful implementation of existing wildfire mitigation efforts, including**

the identification of gaps in existing wildfire mitigation that may be addressed through (a)(i) of this subsection (3) and wildfire risk assessment tools, which must include coordination with the department of health regarding its environmental health disparities map

9. *Should a recommendation include the future development of a policy framework directing cross agency coordination of wildfire hazard and risk mitigation data sharing through the already existing Natural Hazards Data Portal managed by WaTech?*

Recommend conducting further research and analysis before developing this policy framework for cross-agency mitigation data sharing. This research needs to establish the specific use and purpose of shared wildfire hazard and risk mitigation data, clarify how decision-makers across different agencies will utilize this information, determine what data should be publicly available, and ensure full transparency for public access and accountability.

10. *If yes, should a recommendation include the legislature directing WA Tech to develop an access point for local fire protection districts so they can review the wildfire related data in the portal.*

Not answered as "Other" was chosen for question 9.

11. *Should a recommendation include Washington state contracting with an existing entity with expertise in hazard and risk analytics to provide state agencies, local fire districts and Washington state residents with accurate and up to date wildfire hazard and risk assessments at the parcel level:*

Recommend entering a partnership with academic researchers who are working on wildfire propagation models, structure survivability, and vulnerability. Academic institutions can hold the data as well as analyze and interpret the data, and help determine the efficacy of mitigation actions. Residents can voluntarily use these models to enter individual parcel-level information, generating a structure vulnerability score and providing a list of recommended actions to reduce the probability of home ignition. As work is completed, the property owner/resident can enter this information, and the structural ignition vulnerability/survivability score can be adjusted. The resident can then use this information to communicate with interested parties. These types of models, which provide prioritized recommendations, are starting to prove valuable tools in driving individuals to take mitigation actions to reduce risk, as they can see and are empowered to change their scores.

I am uncertain about how effectively hazard and risk assessments translate into actual mitigation actions. While these assessments serve as valuable planning tools, individuals often do not know how to act on the information they provide. Furthermore, most residents in fire-

prone areas already understand their wildfire risk through direct experience with fires in their communities.

12. *Should a recommendation include the legislature directing relevant agencies to develop a policy framework that would establish an information repository where property owners, local fire districts, state agencies, and communities can provide up-to-date wildfire risk mitigation efforts so risk assessing entities (insurance companies, state agencies, local fire districts, etc.) can have a better understanding of completed mitigation activities?*

See answer to question #11. However, it should be up to the resident and within their authority and responsibility to determine if the information will be shared with insurance providers, state agencies, local fire districts, etc. At a minimum, include an “opt-in/out” option for each entity, or leave it up to the resident to work directly with their insurance provider to share information.

13. *Currently, there is no requirement for insurance companies to internally track when nonrenewal or cancellation of residential policies are due to its assessment of wildfire risk. Should a recommendation include requiring insurance companies to internally track when wildfire risk was used to determine eligibility or cost of insurance for a Washington state residential property so policymakers can know the actual number when requested.*

Yes.

D. Improving transparency for consumers regarding wildfire hazard and risk, including through disclosures to policyholders for insurance policy nonrenewals primarily related to wildfire risk, with the intent of increasing the availability of insurance, decreasing nonrenewals, and enhancing market stability that is informed by industry and consumer data

14. *Should a recommendation include requiring insurance companies to disclose wildfire risk scores to consumers if used to determine eligibility and/or cost of insurance?*

Yes.

15. If yes, what information should be included to the consumer: (please click all that apply)

- ✓ Name of model used to determine the wildfire risk score.
- ✓ The date the wildfire risk score was generated.
- ✓ The range of scores available in the risk score model.
- ✓ The range of scores that determine insurance eligibility for the insurance company.

- ✓ What mitigation measures the consumer could carry out to improve the score and become eligible for insurance.

16. *Should the wildfire risk score disclosure be provided only by request of the consumer or without request and provided on all renewal, cancellation, nonrenewal notices?*

Automatically provided when wildfire risk scores are used.

E. Establishing a grant program to provide grants to Washington homeowners for purposes including, but not limited to, retrofitting residential property to resist loss due to wildfire and evaluating whether residential property meets nationally recognized, science-based, wildfire mitigation standards. The work group must include recommendations for:

- A grant program framework that will promote a decrease in the number of nonrenewals of consumer general casualty insurance or property insurance policies; and
- Whether and how local fire protection districts may collaborate with the grant program administrator.

17. *We have heard of success in other states that have faced catastrophic hurricanes and used the IBHS fortified standards as a basis for a grant program to retrofit residential dwellings to improve availability of insurance in high-risk areas.*

*The recommendation for a grant program must include a framework that promotes a decrease in the number of nonrenewals of insurance. The insurance industry requires certification of mitigation performed to be considered for eligibility and pricing purposes. Because of the unique components of wildfire risk, this would need to be an annual certification for wildfire mitigation. The Insurance Institute for Business & Home Safety (IBHS) wildfire prepared homes standards are the only standards that have an annual certification process.*

*To meet this objective, should a recommendation include a grant program using the IBHS standards for wildfire mitigation as the framework?*

Yes, only for IBHS Wildfire Prepared Home as a voluntary program with flexibility incorporated into the grant program that accounts for alternative housing, context-sensitive designs, cooperative housing, or affordable housing, and prioritized for under-resourced, marginalized, systemically or historically excluded, and equity-deserving property owners. In addition, the incentive program should include waiving application and renewal fees. Do not recommend the adoption of IBHS Wildfire Prepared Community until the program is more fully developed.

18. *If no, what framework should be used to achieve the objectives of retrofitting residential property to resist loss and decreasing the number of nonrenewals of insurance?*

Not answered as “Other” was chosen for question 17.

19. *In a recommendation for establishing a grant program it must include a recommendation on whether or how local fire protection districts may collaborate with the grant administrator. Should a recommendation include a requirement the grant program collaborate with local fire districts as part of the program?*

Suggest conducting further research and analysis to determine the appropriate role of fire districts or local governing entities in supporting grant administration. Many fire districts and departments throughout Washington rely on volunteer staffing and may lack the capacity to conduct site visits or provide substantial support to grant administrators. Before requiring collaboration, suggest identifying needs for additional funding, training, and capacity for each fire district, department or entity that will be administering a grant program.

**Alternative Approaches.** If codes and regulations are adopted at state and county levels, engage with those who provide multiple support functions and can support the administration of the grant program: providing ongoing training for fire districts to assess whether structural mitigation measures meet mitigation standards, especially if new state and county wildfire mitigation codes are adopted; dedicating county-level positions to ensure consistent and continuous support for grant program administration across fire districts within the county; ensuring alignment and compliance with implemented codes and standards; administering state dedicated funding to support local fire districts in supporting the grant program; and completing progress reporting and tracking of mitigation actions across the county, including database updates.

This option may be a first step in building capacity and preparing for potential collaboration with the fire districts (especially if adequate support is not immediately available) and emphasizes building capacity, while ensuring that fire districts receive appropriate training and resources to participate meaningfully when they have the capacity and interest to do so.

***Additional recommendations:***

- **Strategic Alignment.** Suggest reviewing the Washington Wildland Fire Strategic Plan to identify existing strategies that support coordination capacity, assessments, and data collection and tracking. This review can help align grant program requirements with established frameworks rather than creating redundant or conflicting systems.
- **Leverage existing retrofit infrastructure and partnerships.** Build home ignition zone and structural retrofit grant or “green” incentive programs using established models and

frameworks already adopted by the state, such as [Washington Department of Commerce weatherization incentive programs](#), or utility partner programs that address wildfire risk mitigation, like those offered by Puget Sound Energy or Cascade Natural Gas. Consumers are already familiar with and actively using these programs for energy efficiency and other purposes, and there is existing overlap with window replacement programs, which also serve as wildfire risk mitigation tactics. Expand and leverage these established partnerships, where administrative capacity and consumer familiarity already exist, to facilitate and coordinate wildfire-specific retrofit programs, thereby reducing implementation barriers and accelerating adoption.

- Provide funding for low- and moderate-income households to rebuild after a fire to wildfire-resistant standards.

20. *If yes, please describe how the grant program administrator should collaborate and interact with local fire districts?*

Not answered as "Other" was chosen for question 19.

21. *If no, please provide a rationale for not collaborating with local fire protection districts.*

Not answered as "Other" was chosen for question 19.