



RICARDO LARA
CALIFORNIA INSURANCE COMMISSIONER

October 15, 2025

Terrence O'Brien, Chair
Board of Forestry and Fire Protection
California Department of Forestry and Fire Protection
715 P Street, 10th Floor
Sacramento, CA 95814

Dear Chair O'Brien and Board Members:

I am writing in **STRONG SUPPORT** of the Board of Forestry and Fire Protection's anticipated approval and implementation of proposed regulations mandated under AB 3074 (Chapter 259, Statutes of 2020). These regulations aim to prevent future wildfire disasters by establishing an ember-resistant five-foot zone around structures in our highest-hazard areas. Finalizing your statewide "Zone Zero" regulations will bolster my efforts to ensure property insurance remains available throughout the state while enabling more individuals to qualify for insurance discounts. With an increasing number of insurance companies re-entering the market under my [Sustainable Insurance Strategy](#), we must adopt a 'whole-of-government' approach to maintain progress.

Research following major wildfires indicates that homes built to the highest Wildland-Urban Interface (WUI) building codes, along with defensible space, are more likely to survive, saving both homes and lives. This can be achieved while also addressing crucial health and safety goals, such as protecting communities from extreme heat through urban tree canopies. Since my election as Insurance Commissioner in 2019, I have transformed California's Department of Insurance to focus on anticipating risks rather than merely reacting to them. We must continue this proactive stance at all levels statewide, and I commend you for your ongoing efforts.

From the outset of my tenure, I have employed a data-driven approach to modernize insurance regulations and advance statewide goals. My Department has responded to over 120 wildfires and collaborated with regulators from all 50 states and several countries, including Portugal, France, and Australia, where wildfires also pose significant public health and safety challenges. A key takeaway from this collective experience is that resilient building practices, including noncombustible space within the first five feet of structures, reduce risks and enhance insurability.

Achieving wildfire safety on a large scale requires a comprehensive effort focused on community education and incentives for those least able to afford necessary work. The home hardening and mitigation discounts I mandated in 2022 can help fund compliance with your Zone Zero regulations. I established the "Safer from Wildfires" regulation—the nation's first

wildfire discount program for insurance—after engaging with tens of thousands of Californians statewide. This initiative is rooted in scientific principles, collaboration among state agencies, and public input. In 2021, my Department convened state agencies to identify achievable and effective steps for property and community-wide mitigation actions. This Wildfire Mitigation Partnership, which includes my Department, the California Department of Forestry and Fire Protection, CalOES, the Governor’s Office of Planning and Research, and the California Public Utilities Commission, released the Safer from Wildfires framework just a year later.

Similar to safe driver or good student discounts recognized by insurance companies, Safer from Wildfires discounts can reduce costs, promote safety, and incentivize mitigation efforts. This program employs an incremental approach, allowing policyholders to receive smaller discounts for completing any of 12 property or community-level actions, including noncombustible space within the first five feet of structures. Discounts vary by company and can range from 4% to over 40% of the total premium, depending on the level of wildfire risk and specific home features. The more actions taken, the greater the potential savings. These insurance discounts accumulate over the life of a home or business, leading to significant long-term savings. Safer from Wildfires aligns with other mitigation initiatives, such as United Policyholders’ nationally recognized Wildfire Risk Reduction and Asset Protection (WRAP) initiative and the IBHS Wildfire Prepared Home standard, which share many elements with my program.

Communities such as Paradise, which suffered the Camp Fire in 2018, Berkeley, which experienced the Tunnel Fire in 1991, South Lake Tahoe, affected by the Caldor Fire in 2021, and Marin County, home to the Marin Wildfire Authority, have made strides in Zone Zero mitigation. These local jurisdictions have implemented robust community education programs supported by grant funds and local ordinances. Following my direct discussions with the insurance industry, some of the state’s largest insurance companies have committed to insuring homes that implement Zone Zero and other measures—a commitment I encourage all other insurers to adopt.

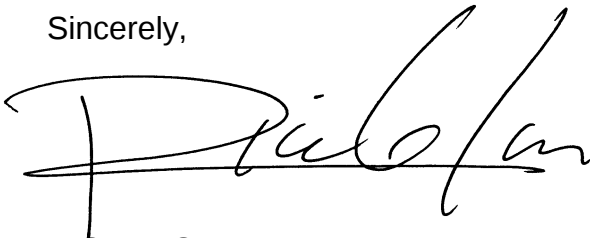
The enactment of AB 3074 in 2020 represented a consensus among fire leaders, environmentalists, and business groups that consistent Zone Zero rules to mitigate ember-driven wildfires are essential for our state’s future. I joined organizations like the California Fire Chiefs Association, California Fire District Association, California Fire Safe Council, Sierra Club of California, and The Nature Conservancy in supporting this law. Since its passage, evidence supporting ember-resistant building codes has only strengthened. A recent [study by IBHS and Headwaters Economics](#) revealed that meeting Wildfire Prepared Home standards incurs only marginally higher costs than constructing a standard, unmitigated home.

My Department has focused on aligning wildfire mitigation efforts across jurisdictions, whether by encouraging entire neighborhoods to take action or prompting local governments to adopt community-wide ordinances. Current regulations establish a baseline for wildfire safety, allowing local governments to impose additional requirements based on specific needs. Allowing local exceptions or misaligned policies undermines our overall goal of wildfire safety by creating confusion for homeowners and a fragmented set of rules that complicate the work

of our firefighters. Wildfires do not recognize city or county boundaries; our strength lies in our unity.

Once again, I express my **STRONG SUPPORT** for the approval and implementation of your proposed regulations mandated under AB 3074 (Chapter 259, Statutes of 2020) to establish an ember-resistant five-foot zone around structures in our highest-hazard areas. Should you have any follow-up questions or require additional information, please contact Mike Peterson, my Senior Deputy Commissioner for Climate and Sustainability. Thank you for considering my letter and for your continued partnership on this critical wildfire protection initiative.

Sincerely,

A handwritten signature in black ink, appearing to read "Ricardo Lara", written over a horizontal line.

RICARDO LARA

California Insurance Commissioner

cc: Elizabeth Forsburg Pardi, Vice Chair
Rich Wade, Board Member
Katie Delbar, Board Member
Jose de Jesus (J.) Lopez, Board Member
Dawn Blake-McQuillen, Board Member
Ryan Hilburn, Board Member
Elicia Goldsworthy, Board Member
Tony Anderson, Executive Officer, Board of Forestry and Fire Protection
Wade Crowfoot, Secretary, California Natural Resources Agency