

SmarterSafer 2024 Wildfire Priorities

Background.

SmarterSafer is a national [coalition](#) made up of a diverse chorus of voices who champion a united front for environmentally responsible and fiscally sound approaches to natural catastrophe mitigation and the promotion of public safety.

Wildfire Risk.

Warmer, drier conditions across the globe, and particularly in the Western United States, have led to longer and more severe fire seasons. This new reality has exacerbated the consequences of wildfires on both properties and human life, leaving many homeowners and broader communities ill-prepared in the face of increasing wildfire risk. According to Verisk's 2023 Wildfire State Risk Report, wildfires continue to pose costly and growing exposure for communities in California and other western states. For example, the report notes that roughly 20% of structures in California are at risk of wildfire, of which 8% are at high to extreme risk. In 2022, there were 7,800 wildfires that burned 309,000 acres across the state.¹ In other western states, such as Montana and Wyoming, Verisk data shows over 50% of structures are at risk of wildfire.² This report and others like it demonstrate the considerable exposure California and other states face from devastating wildfires that can quickly burn large areas and result in substantial loss of property and lives.

In addition to widespread physical damage, wildfires pose significant public health and environmental risks. The smoke from these fires contains very fine particles, and when inhaled, can cause serious chronic respiratory problems.³ If wildfires consume buildings or other manmade structures, the smoke may also contain toxic compounds. Additionally, megadroughts, droughts that last for decades, have become especially common in the Southwest region of the U.S., where normal weather conditions had already included high temperatures and low precipitation.⁴ These megadroughts create prime wildfire conditions. During the summer of 2021, roughly 100 percent of the western U.S. was in a drought⁵, the region's worst since 800 A.D.⁶ These droughts make the region even more sensitive to the emergence of wildfires and cause the dangers that wildfires impose on people and property to intensify.

¹ <https://www.verisk.com/siteassets/media/campaigns/gated/underwriting/fireline-state-risk-report/california.pdf>

² <https://www.verisk.com/insurance/campaigns/location-fireline-state-risk-report/>

³ <https://www.epa.gov/pm-pollution/how-smoke-fires-can-affect-your-health>

⁴ <https://www.nytimes.com/article/what-is-a-megadrought.html>

⁵ <https://www.discovermagazine.com/environment/how-the-u-s-megadrought-will-affect-2022-and-beyond>

⁶ <https://www.nbcnews.com/science/environment/us-megadrought-worst-least-1200-years-researchers-say-rcna16202>

More recently, the number of wildfires in the U.S. in 2023 approached the 10-year average (2013–2022), with over 55,500 reported throughout the year. ([National Interagency Fire Center via NOAA](#))⁷

As extreme weather events intensify, the ramifications of its impact are vividly demonstrated through the escalating global challenge of wildfires. The smoke emanating from 2023 wildfires in Canada, for instance, led to substantial air quality problems for millions of people in parts of the Northeast and Great Lakes regions. On June 7, approximately 100 million individuals across 16 states received air quality alerts, with New York City recording the worst air quality among major cities globally. On June 27, Chicago reported the poorest air quality of any major city in the world as wildfire smoke impacted a substantial portion of the Midwest.⁸ Despite the number of wildfires staying around the average, the occurrences this year underscore how wildfires can impact millions of individuals residing in different regions from where the wildfire originated, including separate countries.

Policy Recommendations.

In 2021, the bipartisan infrastructure law established the federal Wildland Fire Mitigation and Management Commission (WFMMC)⁹. The commission, co-chaired by the Departments of Agriculture, the Interior, and FEMA, and with representatives from state, local, and tribal governments, the private sector, and non-profit groups, was tasked with providing recommendations to Congress to improve federal policies related to mitigation, suppression, management, and post-fire recovery and rehabilitation. The WFMMC published its final [report](#) in September 2023 which outlines a comprehensive, consensus-based set of recommendations to address the nation's wildfire crisis. SmarterSafer has identified multiple recommendations¹⁰ that the Coalition believes Congress should consider, including:

- ***Community Wildfire Risk Reduction Program*** – Establish an interagency coordinating partnership to reduce program friction and create greater alignment and support to proactively address wildfire risk reduction actions and increase ignition resistance of the built environment. [See Report Recommendation 1]
- ***Update Existing Federal Programs to Include Wildfire*** – Integrate wildfire risk reduction measures and technical assistance into existing programs. [See Report Recommendation 2]
- ***Improve Hazard Assessments*** – Support data procurement and analytic systems to inform building codes/standards and promote ignition resistant construction and defensible space. Evaluate need to refine and/or expand state and national wildfire hazard datasets. [See Report Recommendation 4]
- ***Incentivize Community Preparation Activities*** – (1) Create incentives to encourage state, local, and Tribal governments to improve land use planning while increasing accessibility

⁷ NOAA National Centers for Environmental Information, Monthly Wildfires Report for Annual 2023, published online January 2024, retrieved on February 5, 2024 from <https://www.ncei.noaa.gov/access/monitoring/monthly-report/fire/202313>.

⁸ <https://www.ncei.noaa.gov/news/national-climate-202312>

⁹ <https://www.usda.gov/topics/disaster-resource-center/wildland-fire/commission>

¹⁰ Appendix E of the final report contains a complete list of recommendations: <https://www.usda.gov/sites/default/files/documents/wfmmc-final-report-092023-508.pdf>

of federal grants for wildfire risk reduction efforts. (2) Incentivize innovation in affordable building material design, subdivision design, landscape architecture, and safe and sustainable building practices to create more ignition-resistant structures and communities. [See Report Recommendations 3, 6, 142]

- **Hazard Risk Disclosures** – Require all-hazard risk disclosures for real estate transactions, including both sales of newly constructed homes and existing homes, involving all federally backed mortgages such as Fannie Mae and Freddie Mac. [See Report Recommendation 5]
- **Co-stewardship and Comanagement Agreements** – Ensure that federal agencies have the directive and authority to enter into equitable and meaningful co-stewardship and comanagement agreements for multi-jurisdictional lands, and to support Tribal self-governance in order to address wildfire risk reduction, management, and recovery, and to enable beneficial fire practices. [See Report Recommendation 29]
- **Utility Hardening** – Develop both federal standards for electric utility wildland fire mitigation plans and consistent rules and processes for wildfire management of federal rights-of-way. [See Report Recommendations 7, 8, 9]
- **Use Outcome-based Performance Metrics** – Change the system of land management agency performance metrics beyond acres treated to actual risk reduced. [See Report Recommendation 147]
- **Facilitate Prescribed Burning** – (1) Direct Federal agencies develop a strategic plan for the implementation of prescribed fire at a national scale and clarify the extent to which non-federal partners in this plan have Federal Tort Claims Act protection when burning on federal lands. (2) Direct EPA, DOI and USDA to work together to expeditiously evaluate current federal regulations (such as the exceptional events pathway) around the treatment of smoke from wildland fire in air quality management programs with the intent of ensuring the programs can accommodate increased use of beneficial fire. [See Report Recommendations 10, 11, 12, 42, 59]
- **Expand Shared Data** – Support data collaboration to advance modeling and to improve codes, standards and ignition-resistant materials. [See Report Recommendations 107, 108]
- **Improve Tools** – Direct relevant agencies to adopt new and existing technologies to improve the mitigation and management of wildfire and establish more flexible means to work with the private sector. [See Report Recommendations 117, 118]
- **Expand Recovery** – Expand FEMA Public Assistance-eligible activities to cover downstream risks caused by wildfire and review/amend existing programs for barriers which prevent distribution of funds to mitigate impacts from higher flows as a result of wildfire. [See Report Recommendations 63, 79]

Wildfires continue to be a massive threat to the American public and will only increase in severity as climate change continues to worsen. We urge you and your colleagues to work to advance resilience-minded legislation that can help safeguard the physical and economic well-being of individuals and communities.

MEMBERS

Environmental Organizations

American Rivers
Center for Climate and Energy Solutions (C2ES)
ConservAmerica
Defenders of Wildlife
National Wildlife Federation
Natural Resources Defense Council (NRDC)
The Nature Conservancy
Surfrider Foundation

Consumer and Taxpayer Advocates

National Taxpayers Union
R Street Institute
Taxpayers for Common Sense
Taxpayers Protection Alliance

Insurer and Reinsurer Interests

American Property Casualty Insurance Association (APCIA)
Association of Bermuda Insurers and Reinsurers (ABIR)
Chubb
Liberty Mutual Group
National Association of Mutual Insurance Companies (NAMIC)
National Flood Association
Reinsurance Association of America
Swiss Re
USAA

Mitigation Interests

Natural Hazard Mitigation Association

Housing

Habitat for Humanity
National Housing Conference
National Leased Housing Association

ALLIED ORGANIZATIONS

Allianz of America
American Conservation Coalition
American Consumer Institute
Center for Clean Air Policy
CoreLogic
Friends of the Earth
Institute for Liberty
Zurich North America