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1. Wildfire liability regime
 - a. What, if any, issues exist with the application of the inverse condemnation doctrine? Do they limit the equitable distribution of wildfire costs, and if so, how?
 - i. Our concern would be what is considered public use; is protected land considered public use.
 - ii. It possibly limits the equitable distribution of wildfire costs by not including special districts, private agencies, federal agencies, controversial wildland fire management strategies.
 - b. What benefits, if any, are provided by the current application of the inverse condemnation doctrine?
 - i. No comments.
 - c. What, if any, changes to the utility wildfire liability regime do you recommend, and what are the consequences of these changes?
 - i. No comments.
2. Insurance
 - a. What actions can improve utility access to affordable wildfire liability insurance?
 - i. In order for utility companies to access affordable wildfire liability insurance they must utilize comprehensive wildland fuels reduction fire plans in designated wildland high fire severity zones that overlay critical utility infrastructure and align with local CWPP (Community Wildfire Protection Plans).
 - b. What actions can ensure that local governments, homeowners, and businesses are adequately insured for wildfire loss? What actions can improve availability and affordability of homeowners' and commercial insurance?
 - i. Local Governments – Ensure funding for local government to be able to complete the notification, evacuation, residential and commercial construction, dwelling and business geographical positioning, in the wildland urban interface are built to current codes, meet defensible space requirements, Title 14 ingress and egress.
 - ii. Homeowners and Businesses – Ensure local governments have the local funding to complete the above to ensure homeowners and businesses are adequately prepared and protected in the wildland urban interface. Engage insurance companies in the possible funding for long term disaster relief.
3. Financing mechanisms
 - a. What specific problems related to wildfire cost assignment and recovery should a dedicated wildfire fund or other financial mechanism address?
 - i. Wildfire cost assignment and recovery does not currently address full reimbursement,
 - b. What financial mechanism(s) best address the problems you identify within the current liability and insurance regimes? Please provide as much detail as possible regarding proposals (e.g. What liabilities would be covered? Who are the involved parties? What is the administrative structure? How is it capitalized and funded? What level of capitalization is needed? How would subrogation and damage claims be handled? Is it

scalable and how? What are the consumer impacts? What are the risks to the proposed approach?)

- i. No comment.
4. Community and wildfire victim impacts
 - a. What are the specific needs of communities and wildfire victims in considering how costs are socialized?
 - i. Prioritize funding to ensure community revitalization for the folks on long term economic effects.
 - b. What are the specific needs of communities and wildfire victims in considering a potential wildfire fund or other financial mechanism?
 - i. Ensure funding for planning, pre-incident preparedness and awareness of communities in the wildland urban interface.
 - ii. Ensure funding to allow communities to regain economic stability and financial continuity for continued services.
5. Miscellaenous
 - a. Do you have other recommendations for ways to reduce wildfire damage and costs that the Commission should consider?
 - i. Permanent funding for local governments to continue to reduce fuel in high fire severity zones.
 - b. Do you have other recommendations to ensure a more equitable distribution of wildfire costs and liabilities that the Commission should consider?
 - i. No Comments.