

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

## **To The U.S. House of Representatives Committee on Natural Resources Subcommittee on Federal Lands Oversight Hearing**

### **Fix Our Forests: The Need for Urgent Action One Year After the L.A. Wildfires**

**February 3, 2026**

Chairman Tiffany and Ranking Member Neguse, thank you for holding today's hearing on the Fix Our Forests Act, H.R. 471, introduced by House Natural Resources Committee Chairman Bruce Westerman (R-AR) and Rep. Scott Peters (D-CA). This legislation passed the House last January with bipartisan support (279-141), in the wake of the devastating Los Angeles fires. Wildfire events impacting communities have grown in severity and number over the past several years, and Congress must act to reduce the risk of catastrophic wildfires in the U.S.

The American Property Casualty Insurance Association (APCIA) endorsed the Fix Our Forests Act and has encouraged its passage in the House and the Senate. As Senior Vice President in the Policy, Research and International Division of the APCIA, which represents 67 percent of the U.S. property casualty insurance market, I would like to share my perspective on how the Fix our Forests Act will protect lives, and support property and insurance affordability and availability.<sup>1</sup>

Effective mitigation requires coordinated, ongoing actions across federal, state, and local jurisdictions, and among communities and individuals. The Fix our Forests Act will reduce the risk of catastrophic wildfires and the harmful impacts on communities and the environment. In particular, the bill would establish a Community Wildfire Risk Reduction Program to support the adoption of fire-resistant building methods and standards, promote ignition-resistant materials, defensible space, and other measures to reduce risk. It also prioritizes mitigation actions to reduce the fuel loads in our nation's forests and rangelands; and to help prevent utility ignited fires through active vegetation management in federal rights-of-way.

Wildfire losses over the last decade were more than five times higher than in prior decades, with eight of the ten costliest insured wildfires globally occurring in the United States since 2017, and losses expected to rise further this decade following the record \$40 billion Southern California wildfires last January and fires in recent years in Colorado, North Carolina, Tennessee, Georgia, and Hawaii.

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

Importantly, increases in wildfires and conflagrations impact the cost of living, risks to lives and homes, and economic factors – including the cost of insurance. These impacts can be diminished through improved mitigation and resiliency policies found in the Fix Our Forests Act.

For 50 years, insurers have led the development of building safety standards by funding the Insurance Institute for Business & Home Safety (IBHS), which creates evidence-based disaster mitigation standards such as FORTIFIED construction for wind risk and the Wildfire Prepared Home standard to reduce fire risk.<sup>2</sup>

Fire is unlike other hazards such as wind or flooding in that it intensifies in the built environment as homes become additional fuel. Whether fires ignite in the natural or built environment, under extreme fire conditions, such as high wind events, only mitigated properties can slow this progression by eliminating fuel sources and pathways that enable the rapid spread of fire within communities. Though actions must be taken at the scale of entire neighborhoods or communities, not only individual parcels, and vegetation maintenance must become an ongoing priority.

A December study by the IBHS and CAL Fire found that even homes with the top four fire resistant characteristics had less than a 50% chance of avoiding damage when neighboring buildings were within 10 feet, and that structures faced a 58% destruction risk with any combustible material in the immediate perimeter—rising to 87–100% when fuel coverage exceeded 25% of that zone. Following the destructive Camp Fire of 2018 which destroyed about 11,000 homes, the town of Paradise, California, opted to incorporate the IBHS Wildfire Prepared Home standard into its local building codes for all new and rebuilt homes.

The utilization of the IBHS Wildfire Prepared Home standard, and recently launched Wildfire Prepared Neighborhood standard, will help to reduce upward pressure on insurance premiums over time by reducing the likelihood of home ignition through mitigation steps, lowering overall wildfire losses for insurers, and encouraging more insurers to remain in, or return to, high-risk markets.<sup>3</sup> As more homeowners and entire communities adopt these standards, insurers gain confidence in the reduced risk, which supports better availability, more stable pricing, and potential premium credits as loss trends decline. In reducing the severity and frequency of catastrophic, communitywide wildfire losses, the program helps bend down the long-term loss curve, easing pressure on insurance costs.

Recent events in California offer an object lesson in the interrelationship between fire risk, regulation, mitigation, and insurance availability. California's FAIR Plan, a residual market of last resort, where insurance is available to those seeking coverage that cannot be placed in the private market, has ballooned in size—quadrupling over recent years—because the state's outdated regulatory system has severely suppressed rates while wildfire risk has escalated dramatically.<sup>4</sup> In California, insurers face long delays in obtaining necessary rate approvals and have historically been barred from incorporating essential factors like reinsurance costs and forward-looking wildfire catastrophe models into pricing, leaving premiums artificially low relative to actual risk. This regulatory rate suppression has pushed many insurers to limit or withdraw coverage, forcing large numbers of homeowners, especially in high-risk wildfire areas into the FAIR Plan.

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<sup>2</sup> <https://ibhs.org/guidance/fortified-construction-standards/>

<sup>3</sup> <https://wildfireprepared.org/>

<sup>4</sup> <https://www.cfpnet.com/key-statistics-data/>

In contrast, Dixon Trails in Escondido California — a community that integrated wildfire prepared planning — was able to secure private market insurance because it was intentionally designed and built to meet the IBHS standard.<sup>5</sup> Through a collaboration between KB Home and IBHS, every home in Dixon Trails incorporated ignition resistant construction features, including Class A fire rated roofs, non-combustible siding, enclosed eaves, ember resistant vents, fire resistant decks and openings, and mandatory defensible space, while homes are spaced at least ten feet apart to prevent structure to structure fire spread.

The Dixon Trails development also requires ongoing maintenance of these mitigation measures through homeowner's association rules, ensuring risk reduction is sustained over time. This neighborhood wide application of science-based standards breaks common ignition pathways that cause urban conflagrations, giving insurers confidence that losses are far less likely to escalate into catastrophic, correlated claims, which allowed residents to obtain standard private insurance coverage rather than relying on the California FAIR Plan.

Without proactive mitigation across both the natural and built environments, communities face greater risks of loss of life, widespread property destruction, and prolonged displacement of residents following fires. Over time, these repeated catastrophic losses drive higher recovery costs, strain federal, state, and local disaster programs, and undermine insurance availability and affordability, creating a cycle of escalating risk and economic instability that becomes far more costly to address after fires occur rather than before them.

The Fix Our Forests Act would expand and speed wildfire risk reduction efforts on public lands and built environments, improve delivery of decision support and modelling tools to fire practitioners, and improve post fire recovery. In particular, the Fix Our Forests Act proposes two transformational program concepts:

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

Federal efforts and agencies focused on wildfire are currently very fragmented, which in turn has also made it difficult for states and communities to navigate and access federal resources. To more proactively and comprehensively address wildfire risk reduction in the built environment, it will be important to establish a Community Wildfire Risk Reduction program. In establishing a federal interagency partnership between the principal agencies listed, this will help transform these fragmented

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<sup>5</sup> <https://www.sfchronicle.com/california-wildfires/article/safe-homes-insurance-21307292.php>

more integrated, effective, and science-based approach. These principal agencies would then coordinate and align with state agencies, local departments, and tribes for various aspects of the program.

- **Sec. 102. Fireshed Center:** Establishes an interagency center to aggregate data around wildfire management and provides cross-government coordination related to wildfire decision support. The center would focus on assessment and prediction of fire in both the built and natural environment, reduce fragmentation across federal land management agencies, promote coordination and data sharing, streamline procurement processes, provide publicly accessible information to support planning for both fire response and recovery, and disseminate data tools.

There is a need for greater integration of modern science and technology, to help inform real-time decisions. Federal agencies currently have various predictive services and decision support functions, but they have limited interoperability and dissipated priority-setting and purchasing power. This center will facilitate increased integration of data and tools.

**Selected additional Fix Our Forests Act provisions APCA supports:**

Taking a comprehensive approach to wildfire mitigation is essential because preparedness actions, such as fireshed management, fuel reduction, and community defense, directly reduce the likelihood and severity of destructive fires before they occur. During the response phase, improved and ongoing investments made in fire department preparedness improve firefighter safety, operational effectiveness, and coordination, limiting damage to lives, property, and critical infrastructure. Finally, integrating mitigation into recovery by managing the wildfire risk landscape helps ensure long-term resilience, breaks the cycle of repeated losses, and feeds lessons learned back into preparedness.

**PREPARE:**

- **Sec 106. Emergency Fireshed Management:** Directs the Secretary of Agriculture to carry out fireshed management projects and activities which include hazardous fuel management, fuel break creation, hazard tree removal, routine maintenance, vegetation management or operations and maintenance plan, stand density reduction, chemical treatments, and any activity recommended in a state-specific fireshed assessment or community wildfire protection plan. Allows use of categorical exclusions (CEs) for areas suitable for timber production, as identified in a forest plan or where not otherwise prohibited. This section also expands existing Health Forest Restoration Act (HFRA) categorical exclusions from 3,000 acres to 10,000 acres.
- **Sec. 117. Utilizing livestock grazing for wildfire risk reduction, including fuels reduction and postfire recovery:** The bill provides direction to the agencies to develop a strategy for the increased use of targeted grazing, including for the purpose of reducing invasive annual grasses. Federal agencies should expand the use of existing authorities and develop new, nimble ways to apply targeted, off-season grazing to treat invasive annual grasses on landscapes to reduce the role these invasives play in the uncharacteristic frequency and severity of wildfire.

- **Sec. 202. Community wildfire defense research program:** Expands the Joint Fire Science Program by adding a research program focused on testing and advancing innovative designs to create or improve wildfire-resistant structures and communities and establishes a competition for innovative designs in the creation of ignition resistant structures and fire adapted communities. It is important to increase efforts of rewarding innovation in the fields of affordable building material design, subdivision design, landscape architecture, and safe and sustainable building practices to create more ignition-resistant structures and communities.
- **Sec. 203. Vegetation management, facility inspection, and operation and maintenance relating to electric transmission and distribution facility rights-of-way:** Expands the ability of utilities to remove “hazard trees” from 10 feet to those within 150 feet of their power lines and rights of way. Congress should direct agencies to support implementation of consistent rules and processes for federal rights-of-way and develop a guide for states to adopt similar rules and processes.
- **Sec. 204. Categorical exclusion for electric utility lines rights-of-way:** Establishes a categorical exclusion for vegetation management, facility inspection and operation and maintenance plans and related activities. (Excludes wilderness areas where Congress has restricted vegetation removal.)
- **Sec. 301. Biochar innovations and opportunities for conservation, health, and advancements in research:** Establishes a biochar demonstration partnership program to support development and commercialization of biochar. Where practicable, biochar demonstration projects are to use at least 50% of their feedstock from forest thinning and management activities conducted on Forest Service or Bureau of Land Management managed lands. There should be an expansion of research and funding for pilot projects for biomass utilization with the hope that further commercialization of biomass products would help defray the expenses of mechanical risk reduction projects and recommended incentivizing the adoption of new technologies by the private sector to produce value added, and demand-driven innovative wood products.
- **Sec. 302. Accurate Hazardous Fuels Reduction Reports:** Requires annual reporting, available to the public, of hazardous fuel treatment acres on federal land with materials. In determining the number of acres, the Departments of Agriculture (USDA) and the Interior (DOI) are prohibited from counting multiple treatment practices as multiple acres and instead are directed to count each acre only once. Activities and cost per acre, as well as the degree of wildfire risk reduction, must also be reported.  
  
There is a need for changes to reporting, whereby success should be measured by outcomes such as the number of protected assets, values, and resources, and the degree to which forests and rangeland are returned to and maintained in a more resilient state.
- **Sec. 303. Public-private wildfire technology deployment and demonstration partnership:** Creates a public-private wildfire technology testbed program jointly housed at USDA and DOI to include federal land management agencies, and other agencies involved with wildfire response. Collectively, the program is instructed to identify and advance key relevant technologies in a competitive pilot program with private companies, nonprofits, and institutions of higher learning. There is a need for the development and adoption of new technologies for wildfire detection, mitigation, response, and related activities, recommending the development of a fire science and technology advisory board to aid this process.

- **Sec. 309. Fire-Safe Electric Corridors:** Allows the Forest Service or Bureau of Land Management to provide standing permission for electrical utilities to cut and remove hazardous trees near power lines without requiring a timber sale.

#### RESPOND:

- **Sec. 207. Fire department repayment:** Requires USDA and DOI to establish standard operating procedures for timely reimbursement of local fire departments when they are utilized by federal agencies for wildfire response. The slow reimbursement process for local fire departments, and uncertainty of allowable expenses has created hardships for local departments and decreased their willingness to lend resources to fire incidents.

#### RECOVER:

- **Sec. 205. Seeds of Success:** Directs DOI, USDA, and DOD to develop and implement a joint strategy to facilitate sustained interagency coordination and a comprehensive approach to native plant materials development and restoration, such as promoting the re-seeding of native or fire-resistant grasses post-wildfire, particularly in the wildland-urban interface. Congress should support development of seed capacity and call for additional investment in seed collection, processing, storage, and investment in reforestation and revegetation implementation.
- **Sec. 206. Program to support priority reforestation and restoration projects of Department of the Interior:** Requires DOI to identify lands that require reforestation and areas unlikely to experience natural regeneration of forests and report back to Congress on an annual basis on progress addressing these issues. DOI is tasked with coordinating with state, local, and Tribal governments, as well as universities, other federal agencies, and other stakeholders in the process.

## MITIGATION IN THE BUILT ENVIRONMENT:

While there are many natural causes of wildfires, such as lightning strikes, humans caused 87 percent of wildfire ignitions in the U.S. over the last decade as more people live and recreate in areas prone to wildfires.<sup>6</sup> Increasingly, many regions in the U.S. are experiencing evolving man-made and natural environmental conditions that are making them more prone to burn. For example, federal and state policies that have led to the buildup of hazardous fuels further contribute to increased wildfire risk, while local land use policies have allowed substantial community development and population migration in the wildland urban interface (WUI) – an area where the built environment meets or intermingles with nature. The collective impacts of such policies have put a growing number of communities directly in harm's way.<sup>7</sup>

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

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

<sup>6</sup> <https://www.nifc.gov/fire-information/fire-prevention-education-mitigation/wildfire-investigation>

<sup>7</sup> Increasing Wildfire Risk in the Wild, Wild West (Nov 2022) at <https://www.apci.org/attachment/static/7103/>

FIGURE 1

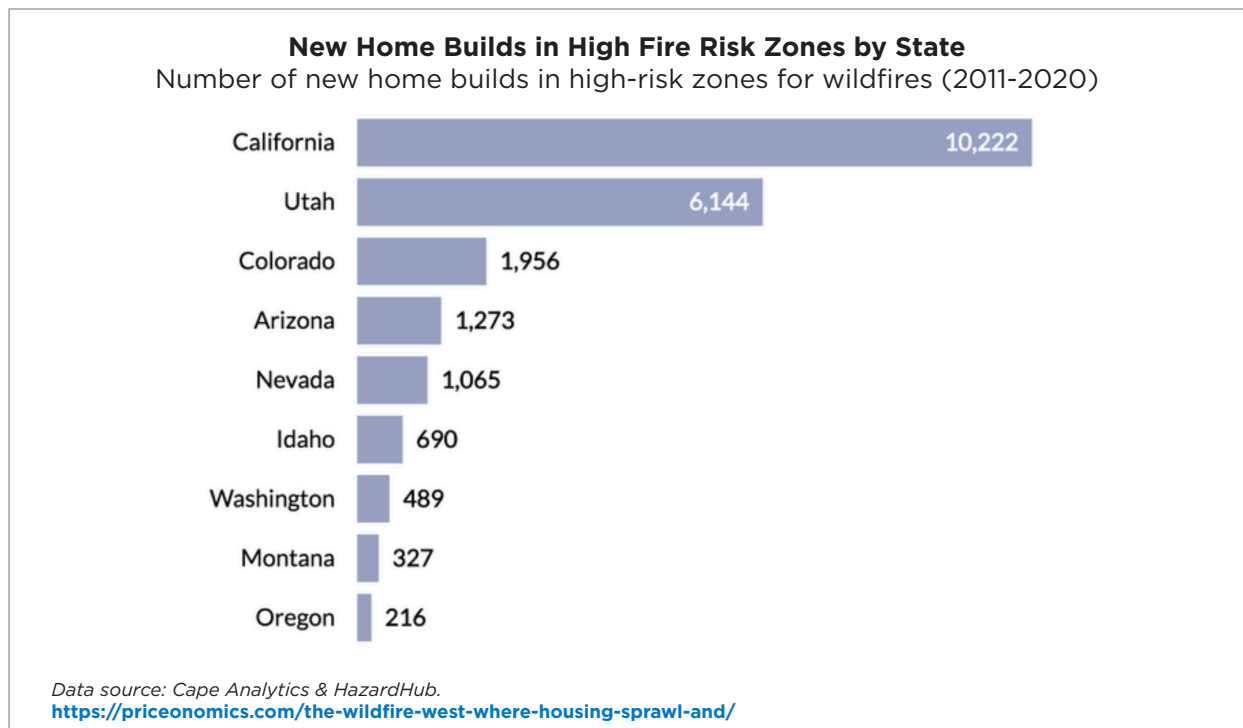
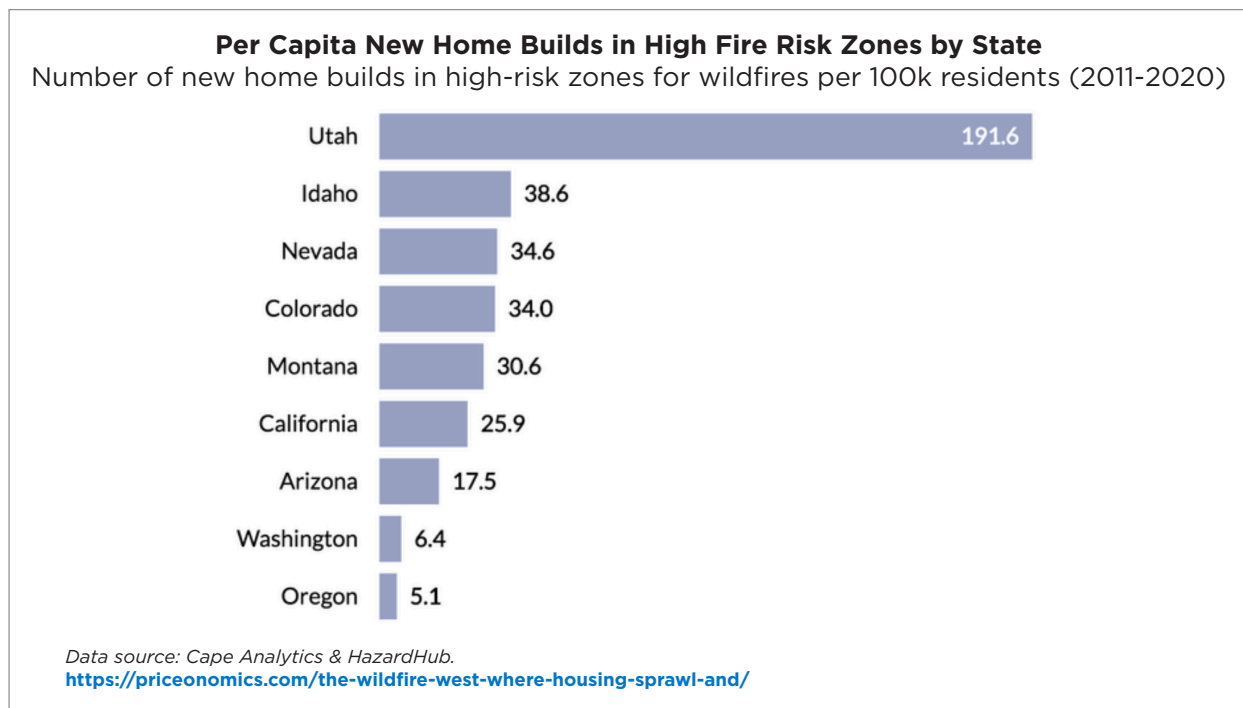
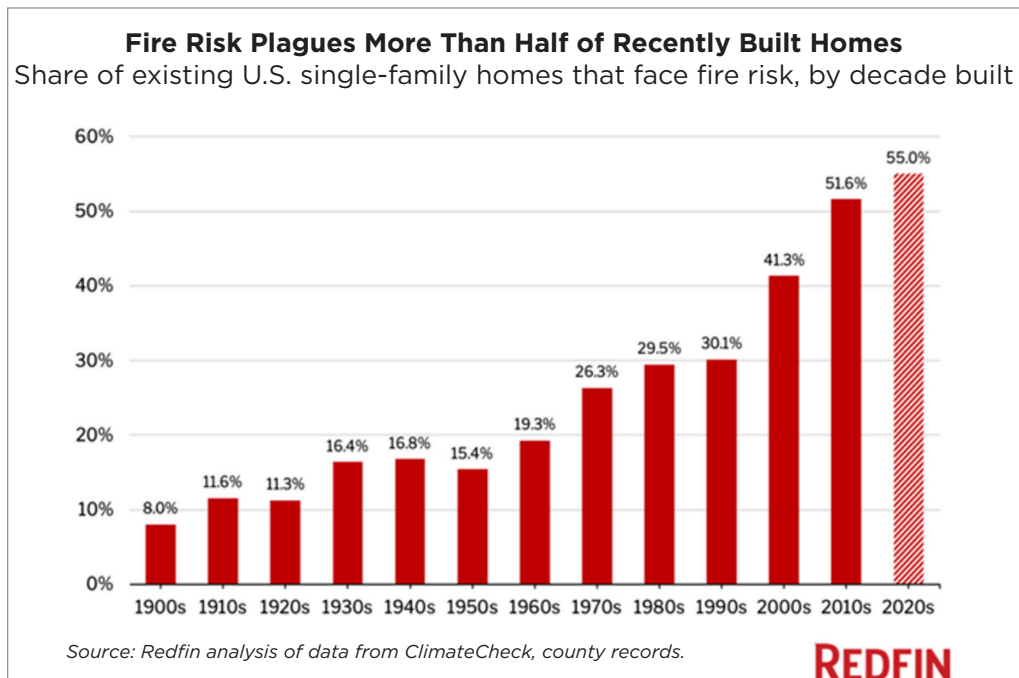


FIGURE 2



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

FIGURE 3



Wildfire seasons are longer and more intense, particularly in the West. Many parts of the East, which have nearly 28 million homes located in zones prone to burn, have seen smaller but impactful increases in fire weather, putting more people at risk.<sup>8</sup>

Additionally, evolving climate conditions enable fires to burn at higher altitudes. In a study entitled ‘Warming enabled upslope advance in western US forest fires’, published in Proceedings of the National Academy of Sciences in June 2021, researchers found climate warming has diminished the ‘high-elevation flammability barrier’ — the point where forests historically were too wet to burn regularly because of the lingering presence of snow.<sup>9</sup>

This was most recently evidenced in California in 2021 as the Dixie Fire became the largest single wildfire in California history.<sup>10</sup> Conditions also enabled for the first time ever a wildfire to burn from one side of the Sierra Nevada mountains to the other — first through the Dixie fire, which destroyed the Gold Rush-era community of Greenville, only to be repeated one month later after the Caldor fire largely destroyed the mountain hamlet of Grizzly Flats and threatened South Lake Tahoe.<sup>11</sup>

As a result, the U.S. is increasingly experiencing unprecedented economic and insured losses due to wildfire. For example, global insured wildfire losses in the last decade were more than five times higher than prior decades, largely driven by wildfires in California.<sup>12</sup> Since 2017, U.S. insurers have experienced 8 of the top 10 costliest insured wildfires ever, globally.<sup>13</sup>

<sup>8</sup> <https://www.climatecentral.org/climate-matters/fire-weather-2023>

<sup>9</sup> <https://www.mcgill.ca/newsroom/channels/news/mountain-fires-burning-higher-unprecedented-rates-331540>

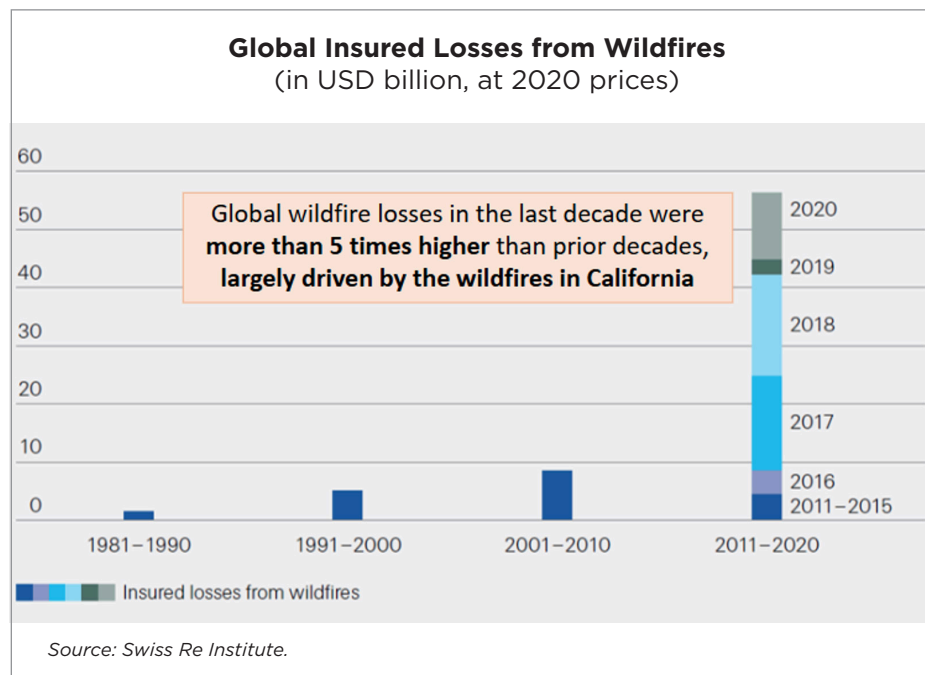
<sup>10</sup> The August Complex Fire in 2020 is the largest wildfire in California after multiple fires merged into a single fire, becoming the state's first ‘Gigafire’ — a single fire resulting in over 1 million acres burned. Only three other Gigafire events have occurred in recent history, including two brush fires in Australia in 2020 that combined to burn 1.5 million acres, the 2004 Taylor Complex fire in Alaska which burned 1.3 million acres, and the 1998 Yellowstone fire in Montana and Idaho which burned 1.58 million acres.

<sup>11</sup> <https://www.latimes.com/california/story/2021-12-13/winter-storms-poised-to-end-california-wildfire-season>

<sup>12</sup> Swiss Re Institute

<sup>13</sup> Aon Climate & Catastrophe Insight

FIGURE 4



Abnormally warm and dry conditions have contributed to devastating wildfires in multiple states in recent years. For example, in 2023, wildfires occurred in North Carolina, Tennessee, Georgia,<sup>14</sup> and the tragic fires of Hawaii — states which are not typically accustomed to such events. Further north, record wildfires in Canada resulted in extremely smoky conditions blanketing northeastern states for extended periods, causing air quality to plummet to “very dangerous” or “hazardous” levels for the first time in some regions.<sup>15</sup> In February 2024, following an abnormally warm winter in Texas,<sup>16</sup> dry and windy conditions resulted in the Smokehouse Creek fire, which burned over a million acres becoming Texas’ largest wildfire on record. In January 2025, catastrophic wildfires devastated regions across Los Angeles, shattering records to become the costliest insured wildfire loss in history, globally, and the most destructive wildfire in Los Angeles history. The region had experienced extreme swings from wet conditions following two rainy winters that led to widespread flooding and heavy growth of brush, followed by severe drought conditions due to one of the hottest summers on record for the region with no measurable rain for roughly nine months prior to the fires.

Wildfires are a natural part of our ecosystem. However, to address these challenges — preventing conflagration-scale losses from devastating communities, natural resources, and ecosystems — the focus must be on the underlying issue — reducing wildfire risk in and around communities. Wildfire research from the IBHS shows homeowners must focus on three vulnerable areas of a home: the roof, specific building features, and defensible space, including a critical 0-5-foot home ignition zone. The primary

<sup>14</sup> <https://www.foxweather.com/weather-news/nc-popular-drive-fire-forrest>

<sup>15</sup> <https://www.cnn.com/2023/09/17/us/air-quality-wildfire-pollution-allergy-dg/index.html>

<sup>16</sup> <https://www.texasmonthly.com/news-politics/texas-warm-el-nino-winter/>

goal is to break ignition pathways, whether through embers that may land on the home or enter through eaves or vents, as well as vegetation or other combustible materials that ignite and are attached or adjacent to the home. The IBHS notes in its recent report, “The Return of Conflagrations in Our Built Environment”, that as the impacts of climate change increase, dense construction, lack of ignition-resistant construction materials, and dense fuels between structures have set the stage for the built environment conflagrations we have seen over the past decade.<sup>17</sup> The tragedy in Hawaii in 2023 demonstrates that the dangers of wildfires are not limited to drought-prone western states. The buildup of vegetation around Lahaina was a known threat for years and culminated in a catastrophic fire that spread through the community.

Similarly, the recent Los Angeles fires occurred in areas prone to wildfire. The risk is predictable and widely known, yet policymakers have continued to allow development that puts homes in the path of fire without appropriate mitigation, such as the region burned in the Palisades fire. “In 1955, the Ventu Park wildfire tore through the canyons above Malibu, burning nearly 14,000 acres and eight homes. The same area saw two large fires burn hillsides and homes over the next three years. There were two in the 1970s, one in the ‘80s and three in the ‘90s. This century those hills saw the Woolsey fire, one of the most destructive burns in California history. The Franklin fire, which scorched the hills just last month, has now been overshadowed by the firestorm that followed.”<sup>18</sup> Of all the structures destroyed by wildfire between 1985 and 2013, more than 80% were in that fire-prone zone.<sup>19</sup>

The science from the IBHS shows that homes can be built to be fire-resistant through both structural and landscape modifications. These actions must be taken at the scale of entire neighborhoods or communities, not only individual parcels, and vegetation maintenance must become an ongoing priority. Particularly, as conflagration-scale loss events occur

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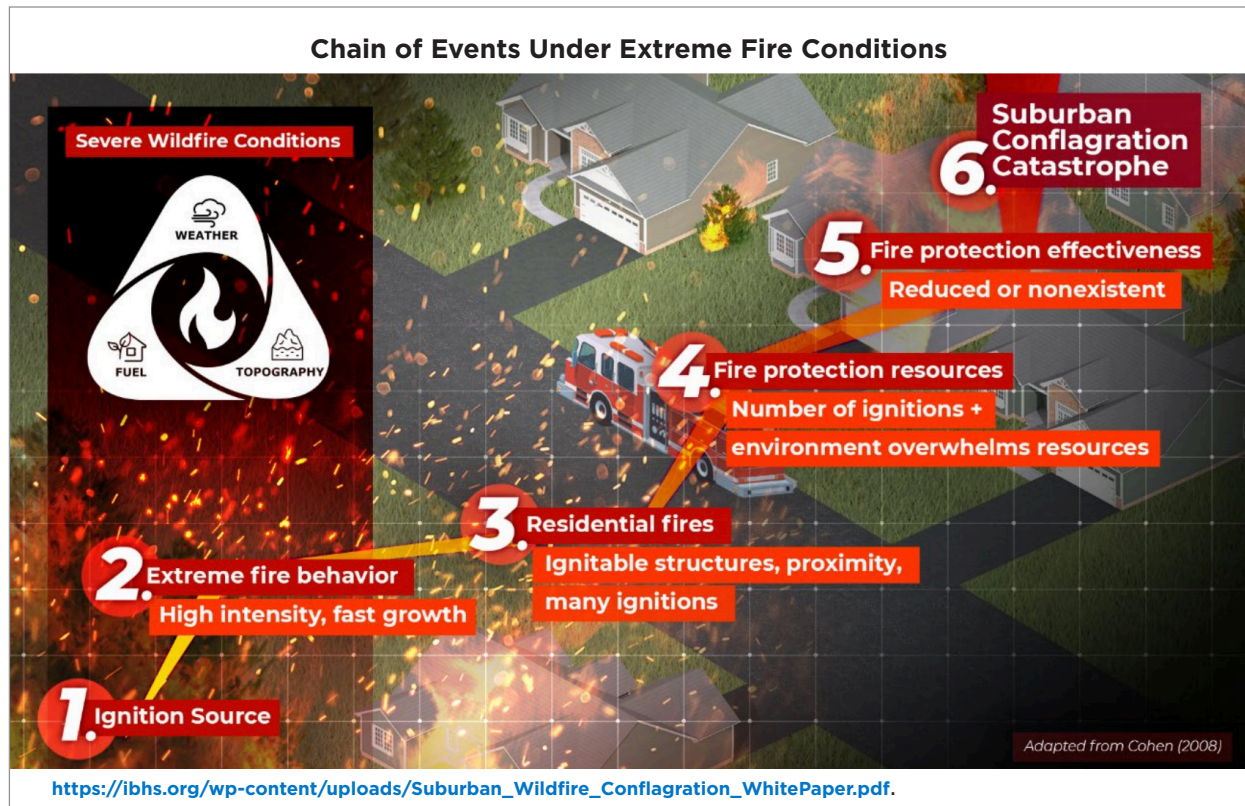
-- the speed of fire spread overwhelms the capacity and response time of our fire suppression resources, limiting ability to extinguish and/or steer the fire away from the community. Whether fires ignite in the natural or built environment, under extreme fire conditions, such as high wind events, only mitigated properties can slow this progression, by eliminating fuel sources and pathways that enable the rapid spread of fire within communities.

<sup>17</sup> <https://ibhs.org/wildfire/returnconflagration/>

<sup>18</sup> <https://www.kpbs.org/news/environment/2025/01/16/why-california-keeps-putting-homes-where-fires-burn>

<sup>19</sup> *Ibid.*

FIGURE 5



Common mechanisms of fire spread are shared. The protective strategies that reduce losses in both environments also share strong similarities. Historically, improved building codes, noncombustible exterior materials, wider spacing between structures, and removal of “ladder” fuels help curb urban conflagrations. These same principles apply to modern wildfire prone communities: structures must resist ember attack, minimize nearby combustible fuels, and incorporate ignition resistant materials so that neighborhoods function as fire breaks rather than fire carriers. Whether the hazard begins inside a city block or in adjacent grasslands, the fundamental protective approach is the same -- reduce ignitability, break fuel continuity, and design communities so that one ignition does not cascade to engulf many.

To accomplish this, we must shift our overall approach to wildfires from reactive to proactive, which includes investing in proactive planning, mitigation, risk reduction, and the workforce needed to accomplish these tasks to break the current cycle of increasingly severe wildfire risk, damage, and loss. Additionally, actions taken to reduce risk must encompass both the built and natural environment.

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

There is an acute need to reduce risk in the natural environment such as removing excess fuel loads and safely restoring beneficial fire to the landscape along with better managing fine fuels that ignite easily (e.g., grasses and shrubs), such as through expanding the use of grazing and other tools that can play a critical role in reducing fast moving fires. These changes are important to restore balance in the natural environment and reduce the risk of catastrophic fires.

Adapting communities to be more resilient to wildfire is also imperative. We must slow the spread of fire and prevent transition from the natural environment into the built environment where conflagration may occur. This is critical to preventing loss of life and property and is also crucial in reducing harmful environmental contaminants. It is important to drive mitigation within the built environment, including promoting incentives for improvements to land-use planning, building codes, and defensible space.

Built environments are structural, spatial, and material characteristics within neighborhoods that allow fires to spread rapidly once a single structure ignites. Dense housing built with combustible exterior materials, close structure to structure spacing, and the presence of “connective fuels” such as fences, decks, sheds, and ornamental vegetation create pathways that allow flames, radiant heat, and embers to move easily from one building to another. Even homes with some hardening features can fail when a neighboring structure becomes fully involved, because burning buildings produce intense heat and generate large volumes of embers that overwhelm these protective measures.

Because these vulnerabilities arise from how entire neighborhoods are built and arranged, parcel level mitigation alone is insufficient; community scale action is required to break the chain of structure-to-structure spread. Effective mitigation requires coordinated reductions in ladder and connective fuels, adoption, and enforcement of ignition resistant building standards, and ensuring adequate structure spacing so neighborhoods function as fuel breaks rather than fuel sources. Mitigation must be systemic, implemented across neighborhoods, guided by codes, ordinances, and shared standards, because only community scale interventions can meaningfully reduce the probability that an initial ignition becomes a catastrophic chain reaction.

Community level mitigation positively impacts insurance affordability and availability by reducing the likelihood that a single ignition will escalate into a largescale, multi-structure loss event -- the exact scenario that drives severe insurance claims volatility and market withdrawal. When neighborhoods contain dense combustible materials, close structure spacing, and extensive connective fuels, fires spread rapidly. By contrast, when communities adopt mitigation, they can directly reduce the expected severity of wildfire events, which is a significant driver of insurance pricing and availability challenges in high-risk regions. Lower expected losses enable insurers to price policies more accurately and keep coverage available in markets that might otherwise see nonrenewals, moratoriums, or soaring premiums.

Insurers support systemic, communitywide risk reduction before committing capital to wildfire exposed areas. This broad, structural risk reduction decreases the chance of correlated, neighborhood wide losses, the type of events that strain insurers' financial capacity and lead to higher rates or market exits. When communities act collectively, the overall risk profile improves, enabling insurers to maintain or expand their presence while offering more stable and affordable premiums. Recognizing there are 44 million homes at risk in the wildland-urban interface, we encourage additional focus by Congress to improve the resiliency of the built environment, which is a critical piece of any comprehensive wildfire solution, to prevent conflagration-scale losses.

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