LEAGUE OF CALIFORNIA CITIES
CSAC
RCRC
RURAL COUNTY REPRESENTATIVES OF CALIFORNIA
NAPA COUNTY CALIFORNIA
COLTON INCORPORATED • 1887
YREKA "THE GOLDEN CITY"
City of OCEANSIDE
City of Santa Rosa
City of WILLITS GATEWAY TO THE REDWOODS
City of ARCATA
Pride of the West Portola • California
CITY OF LOMITA CALIFORNIA
MISSION VIEJO CALIFORNIA 1988
CITY OF SAN MARCOS VALLEY OF DISCOVERY
City of Thousand Oaks
THE CITY OF BENICIA CALIFORNIA
VACAVILLE
CITY OF WEED
CITY OF BIG BEAR LAKE INCORPORATED 1980
CITY OF SANTA CRUZ
BEVERLY HILLS
CALAVERAS COUNTY
CITY OF BREA ORANGE COUNTY CALIFORNIA INCORPORATED FEBRUARY 23, 1917
CITY OF AZUSA CALIFORNIA
CITY OF NAPA
PALM DESERT
CITY OF LOS ALAMITOS
CITY OF GLENDORA INCORPORATED 1911
CITY OF DEL MAR CALIFORNIA
CITY OF WALNUT CREEK
DALY CITY CALIFORNIA GATEWAY TO THE PENINSULA
Claremont · California · 1887 ·
VISALIA
Stanislaus County
THE CITY OF PLEASANTON

DIAMOND BAR
INCORPORATED 1989
THE COUNTY OF FRESNO
1856
THE CITY OF HALF MOON BAY CALIFORNIA
HEMET CALIFORNIA
YOUR HORIZON IS HERE.
HESPERIA 1988
CITY OF RIO DELL CALIFORNIA
CITY OF JACKSON CALIFORNIA
NOVEMBER 24, 1987 CITY OF HIGHLAND
CITY OF LAVERNE SINCE 1906
RPV
CITY OF ORINDA
CITY OF MONROVIA 1887
MARIPOSA COUNTY 1850 MOTHER OF COUNTIES
CITY OF MANTECA, CALIFORNIA Manteca the family city INCORPORATED MAY 28, 1918
COUNTY OF Placer
THE SEAL OF CONTRA COSTA COUNTY CALIFORNIA
NEVADA COUNTY CALIFORNIA
CITY OF RIVERSIDE
CITY OF ROLLING HILLS, CALIFORNIA
Sunnyvale
CITY OF SAN FERNANDO INCORPORATED AUG. 31 1911 CALIFORNIA
KERN COUNTY CALIFORNIA
CITY OF POWAY Incorporated 1980 THE CITY IN THE COUNTRY
THE COUNTY OF SANTA CRUZ SINE PRAEJUDICIO 1850
CITY OF SIERRA MADRE
TEHAMA COUNTY CALIFORNIA
TRACY
Redwood City California Founded 1867
SUTTER COUNTY
Temecula The Heart of Southern California Wine Country
CITY OF WHITTIER CALIFORNIA INC. 1898
THE CITY OF CAMARILLO CALIFORNIA LAS PERSONAS SON LA CIUDAD
COUNTY OF MARIN
City of West Hollywood California 1984
CITY OF PETALUMA 1858
CITY OF WALNUT CALIFORNIA
Yuba COUNTY
MENDOCINO COUNTY 1850

August 17, 2026

The Honorable Monique Limón
Senate President pro Tempore
California State Senate
1021 O Street, Suite 8518
Sacramento, CA 95814

The Honorable Robert Rivas
Assembly Speaker
California State Assembly
1021 O Street, Suite 8330
Sacramento, CA 95814

RE: Opposition to Forthcoming Wildfire Liability Reform Package that Would Limit Public Agency Recovery

Dear Senate Pro Tem Limon and Assembly Speaker Rivas,

On behalf of the League of California Cities (Cal Cities), the California State Association of Counties (CSAC), the Rural County Representatives of California (RCRC), and the undersigned local elected officials, cities and counties, we are calling on you to **reject efforts to limit public agency recovery** when private electric utilities cause wildfires, as proposed in the Governor's wildfire liability reform package, prompted by the SB 254 Report.

This proposal will wrongly shift costs to taxpayers and force devastating consequences on public agencies and wildfire victims already struggling to rebuild their communities. The proposal relies on the false hopes that public property, infrastructure and emergency response costs can be recovered from FEMA or insurance. Limiting public agency recovery will only shift costs to taxpayers and leave public agencies financially stranded – or even worse, bankrupt. **We strongly oppose the following reforms and urge the Legislature to reject them outright from being included in any wildfire package that will advance this legislative session.**

1. **Limiting Public Property and Infrastructure Damages Imperils Public Agencies Tasked with Rebuilding their Communities**

The proposal will have negligent private electric utilities pay just pennies on the dollar to rebuild critical infrastructure and public facilities that are destroyed. Limiting such costs to the mere depreciated value of the public facility or infrastructure will impact the rebuilding of:

- Public facilities and buildings
- Water, sewer, roads, communication, and traffic signal infrastructure
- Parks, schools, libraries, and fire stations

When a private electric utility causes a wildfire, they are required to fully compensate for property damage. Public agencies cannot rebuild damaged infrastructure on recovery dollars that only cover the depreciated value of an asset. Rebuilding public facilities and infrastructure is not a luxury - it is an essential public service for homeowners, businesses, and communities to return home.

2. **Limiting Recovery for Emergency Response and Mutual Aid Forces Public Agencies to Absorb Costs and Increase Financial Risk, Waiting Years For FEMA Reimbursement While Communities Struggle to Recover**

The proposal prevents public agencies from recovering emergency response and mutual aid costs from the very private electric utilities who cause these devastating wildfires and inappropriately suggest FEMA as the solution. Limiting emergency response cost recovery will be catastrophic for small jurisdictions and fracture our mutual aid system upon which the state and communities rely on. There is a federal obligation to pursue negligent parties per the Stafford Act. This will create ambiguity when negligent parties must meet that requirement and will jeopardize federal reimbursement. FEMA has strict rules on recoverability, and some events aren't even eligible for FEMA reimbursement. Since FEMA is a reimbursement model, funds must be spent upfront. Interpretations in FEMA change from Administration to Administration, creating uncertainty whether future relief will even be available for these incidents.

3. **Eliminating Property Tax Losses Leaves Communities Financially Stranded**

Schools, cities, counties, and special districts rely on property taxes to fund basic needs in our communities. The proposal will financially strand public agencies by eliminating the ability to bring claims for lost property taxes. This has tremendous consequences for essential public services, including fire, police, social services programs, drinking water, public infrastructure, and drastically risks school closure.

There is no evidence in the SB 254 Report to suggest that public agency claims are unreasonable or unjustified. **Public agency damages amounted to merely 4% of the total wildfire claims that utilities paid from 2017 to 2024.** Public infrastructure, lost tax revenue, emergency response, and mutual aid are necessary and critical for local governments to function while struggling to rebuild their communities. **If public agencies cannot recover costs from negligent private electric utilities, local taxpayers will pay more instead. The very survivors whose community burned will foot the bill which is NOT an equitable approach to socializing wildfire risk.**

We respectfully request the Legislature to protect public infrastructure, safeguard emergency response and our mutual aid system, and protect taxpayers from this private electric utility bailout – and to reject the Governor's proposal to limit public agency recovery when such utilities cause wildfires.

Sincerely,

Melissa Sparks-Kranz
Legislative Advocate
League of California Cities

John Kennedy
Senior Policy Advocate
Rural County Representatives of California

Jordan Wells
Legislative Advocate
California State Association of Counties

And on behalf of the following cities, counties and local elected officials:

City of Arcata
City of Azusa
City of Benicia
City of Beverly Hills
City of Big Bear Lake
City of Brea
Calaveras County
Contra Costa County
City of Camarillo
City of Poway
City of Claremont
City of Colton
City of Daly City
City of Del Mar
City of Diamond Bar
Fresno County
City of Glendora
City of Half Moon Bay
City of Hemet
City of Hesperia
City of Highland
City of Jackson
Kern County
City of La Verne
City of Lomita
City of Los Alamitos
City of Manteca
Mariposa County
Mendocino County
Marin County
City of Monrovia
City of Mission Viejo
City of Napa
Napa County
Nevada County
City of Oceanside
City of Orinda
City of Palm Desert
City of Petaluma
Placer County
City of Pleasanton
City of Portola
City of Rancho Palos Verdes
Redwood City
City of Rio Dell
City of Riverside
City of Rolling Hills
City of San Fernando
City of San Marcos
City of Santa Cruz
Santa Cruz County
City of Santa Rosa
City of Sierra Madre
City of Sunnyvale
Stanislaus County
Sutter County
Tehama County
City of Temecula
City of Thousand Oaks
City of Tracy
City of Vacaville
City of Visalia
City of Walnut
City of Walnut Creek
City of Weed
City of West Hollywood
City of Whittier
City of Willits
City of Yreka
Yuba County

Supervisor Anne Contrell, Napa County
Mayor Brett Taylor, City of Visalia
Mayor David Tennessen, City of Camarillo
Councilmember Debby Stegura, City of Rolling Hills Estates
Councilmember Evan Branning, City of Livermore
Mayor Frank J. Navarro, City of Colton
Supervisor Gary Bradford, Yuba County
Mayor Glenn R. Sylvester, City of Daly City
Councilmember Holly Tillman, City of Clayton
Supervisor Jake Withrow, Glenn County
Vice Mayor James Mai, City of Irvine
Supervisor Jill Cox, Trinity County
Supervisor Justin Cummings, Santa Cruz County
Mayor Kevin Wilk, City of Walnut Creek
Supervisor Kim De Serpa, Santa Cruz County
Councilmember Larry Spicer, City of Monrovia
Supervisor Manu Koenig, Santa Cruz County
Supervisor Monica Martinez, Santa Cruz County
Councilmember Nathan Steele, City of Seal Beach
Councilmember Pamela Campos, City of San Jose
Mayor Stephanie Hellman, City of Fairfax
Mayor Sylvia Lemus, City of Cotati
Councilmember Xouhoa Bowen, City of San Leandro

cc: The Honorable Governor Gavin Newsom
Members, California State Senate
Members, California State Assembly