







Oct 6, 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 Half Moon Bay	City of Poway
City of Artesia	City of Hemet	City of Point Arena
City of Atascadero	City of Hesperia	Placer County
City of Albany	City of Highland	City of Pleasanton
City of Agoura Hills	City of Irvine	City of Rosemead
City of Azusa	City of Indian Wells	City of Rancho Palos Verdes
Alameda County	City of Jackson	Redwood City
Town of Apple Valley	Kern County	City of Rio Dell
City of Benicia	Lake County	City of Riverside
City of Bellflower	City of La Mirada	City of Rolling Hills
City of Buena Park	City of La Verne	City of Rolling Hills Estates
City of Beverly Hills	City of Lake Elsinore	City of San Fernando
City of Big Bear Lake	City of Lakeport	City of San Jose
City of Brea	City of Lake Forest	City of San Marcos
Calaveras County	City of Lakewood	City of Santa Cruz
Contra Costa County	City of Lomita	City of Santee
City of Camarillo	City of Los Alamitos	City of Salinas
City of Coachella	City of Livermore	City of Seal Beach
City of Claremont	Lassen County	City of Santa Rosa
City of Colton	City of Manteca	City of Sierra Madre
City of Clearlake	City of Maywood	City of Stanton
City of Corona	City of Moreno Valley	City of Sunnyvale
City of Cloverdale	Marin County	City of Santa Monica
City of Carlsbad	Mariposa County	City of Santa Barbara
City of Daly City	Mendocino County	City of Solana Beach
City of Del Mar	Monterey County	City of San Luis Obispo
City of Diamond Bar	Modoc County	City of Santa Paula
City of Downey	Mono County	City of Saratoga
City of Danville	City of Monrovia	City of South Gate
City of Dublin	City of Morgan Hill	Santa Cruz County
City of El Cerrito	City of Mission Viejo	Santa Barbara County
City of Emeryville	City of Napa	San Bernardino County
El Dorado County	Napa County	Santa Clara County
City of Fremont	Nevada County	San Joaquin County
Fresno County	City of Oakland	San Mateo County
City of Glendora	City of Oceanside	San Luis Obispo County
City of Greenfield	City of Orinda	Sonoma County
City of Goleta	City of Palm Desert	Stanislaus County
City of Hayward	City of Petaluma	Sutter County

Sacramento County
Tehama County
City of Temecula
City of Torrance
City of Thousand Oaks
City of Tracy
City of Tustin
City of Vacaville
City of Visalia

City of Vista
City of Walnut
City of Walnut Creek
City of Weed
City of West Hollywood
City of Whittier
City of Willits
City of Yreka
Yolo County

Yuba County
Marin County Council of
Mayors and Councilmembers
Orange County Fire Authority
Sonoma County Mayor's and
Councilmembers' Association
Ventura Council of Governments

Supervisor Anne Contrell, Napa County
Mayor Brett Taylor, City of Visalia
Mayor Bill Powers, City of Portola
Mayor Betsy Smegal Andersen, City of Piedmont
Vice Mayor Conna McCarthy, City of Piedmont
Mayor Dr. Cynthia Gonzalez, City of Cudahy
Mayor Carlos Juarez, City of Santa Paula
Mayor David Tennesen, City of Camarillo
Councilmember Debby Stegura, City of Rolling Hills Estates
Councilmember Dorothy Pemberton, City of Downey
Councilmember David McGowan, City of Palos Verdes 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
Supervisor Jill Cox, Trinity County
Supervisor Justin Cummings, Santa Cruz County
Vice Mayor Jaime Patino, City of Union City
Councilmember Jen Long, City of Piedmont
Mayor Joshua Barron, City of South Gate
Mayor John Stephens, City of Costa Mesa
Mayor Kevin Wilk, City of Walnut Creek
Supervisor Kim De Serpa, Santa Cruz County
Mayor Kerry Hills, City of Moraga
Councilmember Larry Spicer, City of Monrovia
Councilmember Lorrel Plimier, City of Piedmont
Supervisor Manu Koenig, Santa Cruz County
Supervisor Monica Martinez, Santa Cruz County
Mayor Michael Kamps, City of Palos Verdes Estates
Mayor Mike Hannon, City of Newark
Mayor Pro Tem Dr. Monica Sánchez, City of Pico Rivera
Councilmember Nathan Steele, City of Seal Beach
Councilmember Norma Martínez-Rubin, City of Pinole
Councilmember Pamela Campos, City of San Jose
Mayor Stephanie Hellman, City of Fairfax
Mayor Sylvia Lemus, City of Cotati
Chair of Supervisors Sukhminder S. Dhaliwal, San Joaquin County
Vice Mayor Steve "Woody" Culleton, Town of Paradise
Councilmember Tom Ramsey, City of Piedmont
Councilmember Xouhoa Bowen, City of San Leandro

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