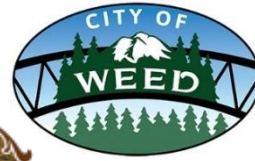
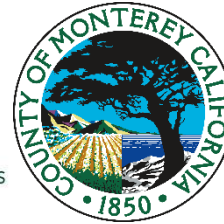




LEAGUE OF
CALIFORNIA
CITIES



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA



CITY OF
WALNUT
CREEK

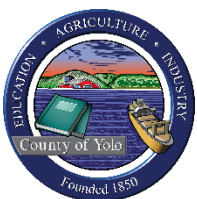
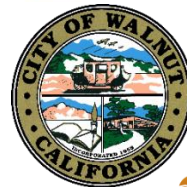
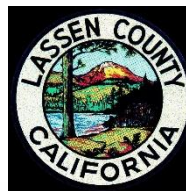
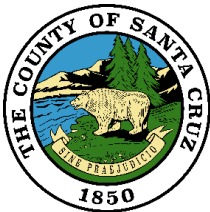


Town of
Apple Valley
California





Sunnyvale



August 19, 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 Los Alamitos	City of Santa Cruz
City of Albany	City of Livermore	City of Santee
City of Agoura Hills	City of Manteca	City of Seal Beach
City of Azusa	Lassen County	Santa Cruz County
City of Benicia	Marin County	City of Santa Rosa
City of Beverly Hills	Mariposa County	City of Sierra Madre
City of Big Bear Lake	Mendocino County	City of Sunnyvale
City of Brea	Monterey County	Santa Barbara County
Calaveras County	Modoc County	Santa Clara County
Contra Costa County	Mono County	San Mateo County
City of Camarillo	City of Monrovia	San Luis Obispo County
City of Poway	City of Morgan Hill	Sonoma County
City of Claremont	City of Mission Viejo	Stanislaus County
City of Colton	City of Napa	Sutter County
City of Daly City	Napa County	Tehama County
City of Del Mar	Nevada County	City of Temecula
City of Diamond Bar	City of Oceanside	City of Torrance
Fresno County	City of Orinda	City of Thousand Oaks
City of Glendora	City of Palm Desert	City of Tracy
City of Hayward	City of Petaluma	City of Vacaville
City of Half Moon Bay	Placer County	City of Visalia
City of Hemet	City of Pleasanton	City of Walnut
City of Hesperia	City of Portola	City of Walnut Creek
City of Highland	City of Rancho Palos	City of Weed
City of Jackson	Verdes	City of West Hollywood
Kern County	Redwood City	City of Whittier
City of La Mirada	City of Rio Dell	City of Willits
City of La Verne	City of Riverside	City of Yreka
City of Lake Elsinore	City of Rolling Hills	Yolo County
City of Lake Forest	City of San Fernando	Town of Apple Valley
City of Lakewood	City of San Jose	Yuba County
City of Lomita	City of San Marcos	

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
Councilmember Dorothy Pemberton, City of Downey
Mayor Bill Powers, City of Portola
Councilmember Norma Martínez-Rubin, City of Pinole
Mayor Mike Hannon, City of Newark
Vice Mayor Jaime Patino, City of Union City
Mayor Betsy Smegal Andersen, City of Piedmont
Vice Mayor Conna McCarthy, City of Piedmont
Councilmember Jen Long, City of Piedmont
Councilmember Tom Ramsey, City of Piedmont
Councilmember Lorrel Plimier, City of Piedmont
Mayor Kerry Hills, City of Moraga

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