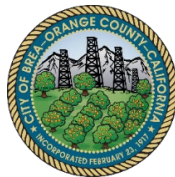




LEAGUE OF
CALIFORNIA
CITIES



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA







August 21, 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 Lake Elsinore	City of Santee
City of Artesia	City of Lakeport	City of Salinas
City of Atascadero	City of Lake Forest	City of Seal Beach
City of Albany	City of Lakewood	Santa Cruz County
City of Agoura Hills	City of Lomita	City of Santa Rosa
City of Azusa	City of Los Alamitos	City of Sierra Madre
Alameda County	City of Livermore	City of Stanton
City of Benicia	City of Manteca	City of Sunnyvale
City of Bellflower	Lassen County	City of Santa Monica
City of Buena Park	Marin County	City of Santa
City of Beverly Hills	Mariposa County	Barbara
City of Big Bear Lake	Mendocino County	Santa Barbara
City of Brea	Monterey County	County
Calaveras County	Modoc County	San Bernardino
Contra Costa	Mono County	County
County	City of Monrovia	Santa Clara County
City of Camarillo	City of Morgan Hill	San Joaquin County
City of Coachella	City of Mission Viejo	San Mateo County
City of Claremont	City of Napa	San Luis Obispo
City of Colton	Napa County	County
City of Clearlake	Nevada County	Sonoma County
City of Daly City	City of Oakland	Sonoma County
City of Del Mar	City of Oceanside	Mayor's and
City of Diamond Bar	City of Orinda	Councilmembers'
City of Downey	City of Palm Desert	Association
City of El Cerrito	City of Petaluma	Stanislaus County
El Dorado County	City of Poway	Sutter County
Fresno County	Placer County	Sacramento County
City of Glendora	City of Pleasanton	Tehama County
City of Greenfield	City of Rosemead	City of Temecula
City of Hayward	City of Rancho Palos	City of Torrance
City of Half Moon	Verdes	City of Thousand
Bay	Redwood City	Oaks
City of Hemet	City of Rio Dell	City of Tracy
City of Hesperia	City of Riverside	City of Tustin
City of Highland	City of Rolling Hills	City of Vacaville
City of Irvine	City of Rolling Hills	City of Visalia
City of Jackson	Estates	City of Vista
Kern County	City of San Fernando	Ventura Council of
Lake County	City of San Jose	Governments
City of La Mirada	City of San Marcos	City of Walnut
City of La Verne	City of Santa Cruz	City of Walnut Creek

City of Weed
City of West
Hollywood

City of Whittier
City of Willits
City of Yreka

Yolo County
Town of Apple Valley
Yuba County

Supervisor Anne Contrell, Napa County
Mayor Brett Taylor, City of Visalia
Mayor David Tennesen, 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
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
Chair of Supervisors Sukhminder S. Dhaliwal, San Joaquin County
Vice Mayor Steve "Woody" Culleton, Town of Paradise
Mayor John Stephens, City of Costa Mesa

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