CITY OF IRVINE 1971

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June 25, 2026

The Honorable Sheila F. Hanson
Presiding Judge of the Superior Court
700 Civic Center Drive West
Santa Ana, CA 92701

Re: Response to the 2025-2026 Orange County Grand Jury Report Titled, "Wildfires Hit Home"

Dear Judge Hanson:

The City Council of the City of Irvine has authorized the following responses to the 2025-2026 Orange County Grand Jury report titled "Wildfires Hit Home." In accordance with Penal Code Section 933.05(a) and (b), the City provides the following responses to the report's findings and recommendations.

FINDINGS

<u>Finding F1</u> – **More frequent and severe wildfires driven by increasingly hotter, drier, and windier conditions in the Orange County wildland-urban interface are escalating impacts on financial and non-financial resources. Among the financial costs are dramatic increases in homeowners' insurance premiums, nonrenewals, and inabilities to obtain insurance.**

<u>Response</u>: The City of Irvine agrees with this finding. The City recognizes that increasingly hotter, drier, and windier conditions have heightened wildfire risk throughout Southern California. These changing conditions affect public safety, emergency response operations, infrastructure resilience, environmental resources, and the economic well-being of residents and businesses. The City also acknowledges the growing burden on homeowners who are facing significant increases in insurance premiums, policy nonrenewals, and, in some cases, difficulty obtaining coverage.

Irvine remains committed to proactive wildfire preparedness and risk reduction through coordinated planning, emergency management, vegetation management, corresponding updates to building and development codes, public education, and collaboration with the Orange County Fire Authority (OCFA) and other emergency agencies. The City will continue to support efforts that enhance community resilience and reduce wildfire risk while advocating for practical, balanced approaches to insurance availability and affordability for residents.

Finding F2 – **Actions that address conditions in the home ignition zone to significantly reduce ignition potential can prevent a community wildland-urban interface fire disaster or suburban conflagration.**

Response: The City of Irvine agrees with this finding. The City recognizes that the area immediately surrounding structures, commonly referred to as the home ignition zone, plays a critical role in determining whether a structure survives a wildfire event. Research and post-fire investigations have consistently demonstrated that proactive measures within this zone, which include vegetation management, the use of fire-resistant building materials, reduction of combustible materials near structures, and ongoing property maintenance, can significantly reduce the likelihood of structure ignition during a wildfire.

The City further acknowledges that community-wide implementation of these measures can substantially improve resilience in wildland-urban interface areas and help prevent the spread of fire from structure to structure during extreme wildfire events. Reducing ignition potential at the parcel level, when combined with broader fuel management, emergency preparedness, and public education efforts, can lessen the risk of large-scale wildfire disasters and suburban conflagrations.

Irvine remains committed to supporting wildfire preparedness and risk-reduction strategies through land use planning, targeted building code updates, public outreach, and coordination with OCFA. These efforts will all help strengthen community resilience and enhance the protection of lives, property, and critical infrastructure from wildfire threats.

Finding F3 – **Expanded engagement with the community to raise awareness and provide support regarding home hardening and defensible space will increase effectiveness of wildfire risk mitigation and insurance risk reduction efforts.**

Response: The City of Irvine agrees in part with this finding. Expanded community engagement, education, and support regarding home hardening and defensible space can increase the effectiveness of wildfire risk mitigation efforts. Public awareness and participation are critical components of community resilience, and providing residents with information and resources regarding wildfire preparedness can help reduce structure vulnerability, improve defensible space practices, and enhance overall wildfire readiness.

The City supports continued outreach and collaboration among local governments, OCFA, homeowners, and community organizations to encourage the implementation of wildfire risk reduction measures. These efforts can contribute to reducing the likelihood of property damage and improving public safety during wildfire events. The City maintains an Emergency Operations Plan and Local Hazard Mitigation Plan, both of which may be found on the Office of Emergency Management webpage. These plans provide detailed information for the public related to wildfire risk and readiness.

However, the City is unable to determine the extent to which expanded community engagement and support efforts will directly increase the effectiveness of insurance risk reduction efforts. Insurance underwriting practices, premium determinations, policy availability, and coverage decisions are influenced by numerous factors beyond local outreach and education initiatives, including statewide market conditions, insurer-specific risk models, regulatory requirements, reinsurance costs, and regional wildfire exposure. While home hardening and defensible space measures may be considered by some insurers, the relationship between local engagement efforts and measurable insurance outcomes is uncertain and largely outside the City's control.

Accordingly, the City agrees that expanded engagement can improve wildfire risk mitigation but cannot conclusively agree that such efforts will directly result in increased effectiveness of insurance risk reduction efforts.

Finding F4 – **Achievement of community-level and property-level wildfire risk mitigation designations (such as Firewise USA Site, Fire Risk Reduction Community or Insurance Institute for Business and Home Safety certification) lessens wildfire risk and helps reduce insurance premium costs.**

Response: The City of Irvine agrees in part with this finding. The City would generally agree that community-level and property-level wildfire mitigation designations, such as the Firewise USA program, wildfire risk reduction certifications, or standards developed by the Insurance Institute for Business and Home Safety, can help lessen wildfire risk when they result in meaningful implementation of mitigation measures. These programs typically encourage:

- Creation and maintenance of defensible space,
- Home hardening measures (ember-resistant vents, Class A roofing, noncombustible materials, etc.),
- Community education and preparedness,

- Vegetation and fuel management, and
- Coordination among residents, local governments, and OCFA.

Research following major California wildfires has shown that structures with appropriate home hardening and defensible space measures are often more likely to survive wildfire events than structures without such protections.

The City notes that the connection between certifications and insurance costs is more complicated. Some insurers are beginning to recognize wildfire mitigation efforts and may offer discounts for specific home hardening measures, consider participation in recognized wildfire mitigation programs, and use community-level risk reduction efforts as one factor in underwriting decisions. However, there is currently no guarantee that achieving a Firewise or similar designation will result in lower premiums or improved insurance availability.

Importantly, insurance rates and underwriting decisions are influenced by many factors, including regional wildfire exposure, catastrophe modeling, reinsurance costs, State regulatory requirements, company-specific underwriting practices, and broader insurance market conditions. In California, many homeowners have experienced premium increases and nonrenewals even in communities that have invested heavily in wildfire mitigation because insurers evaluate risk at multiple geographic scales.

The City agrees that achievement of recognized community-level and property-level wildfire mitigation designations may contribute to reducing wildfire risk by encouraging implementation of defensible space, home hardening, and community preparedness measures. However, the extent to which such designations alone would reduce insurance premiums or improve insurance availability is uncertain, as insurance underwriting and pricing decisions are influenced by numerous factors outside the City's control, including insurer risk models, statewide market conditions, regulatory requirements, and regional wildfire exposure.

Finding F5 – **All county residents should be made aware that Safer from Wildfires regulation requires insurers to provide discounts to homeowners and communities that implement home hardening and defensible space measures regardless of whether a property is located within a Fire Hazard Severity Zone.**

Response: The City of Irvine agrees with this finding. Staff will update the City website in Summer 2026 to provide information on the Safer from

Wildfires program, which requires insurance companies to give discounts to home and business policyholders who strengthen protection for their properties against wildfire events. Examples of property protections include incorporation of building features such as Class A fire-rated roofs, a 5-foot ember-resistant zone, a noncombustible area at the bottom of exterior walls, ember and fire-resistant vents, multi-pane windows or shutters, enclosed eaves, as well as landscaping mitigation including as clearing vegetation and debris from beneath decks, removing combustible sheds and outbuildings from the immediate surroundings of a property, trimming trees, removing brush and debris from the yard, and remaining in compliance with state and local ordinances for keeping a defensible space.

Finding F6 – **AB 888, California Safe Homes Grant Program, provides financial assistance to eligible homeowners, cities, counties, and special districts for home hardening and defensible space measures. Applying for and using these grant funds will reduce wildfire losses and improve insurability and resilience of vulnerable communities.**

Response: The City of Irvine agrees with this finding, but notes that AB 888's applicability would be limited within City boundaries. The City recognizes that the California Safe Homes Grant Program provides important financial resources that support wildfire risk reduction activities, including home hardening and defensible space improvements. These measures are widely recognized as effective strategies for reducing structure vulnerability and improving community resilience in wildland-urban interface areas.

Applying for and utilizing available grant funding can enhance the ability of homeowners and public agencies to implement proven wildfire mitigation measures that may reduce potential wildfire losses. The City also acknowledges that such investments in risk reduction can contribute to strengthening community resilience and may be considered by insurers as one of multiple factors in evaluating property risk.

Irvine notes that eligibility for the California Safe Homes Grant Program is likely limited for a majority of the City's residents, as program participation is limited to 1) those who own and live in (as a primary residence) a home in a High or Very-High Fire Hazard Severity Zone, as designated by CAL FIRE; and 2) low to moderate income homeowners who meet state income limits. The vast majority of the land within the City is outside of the fire hazard zones, more than half of the housing units are renter occupied, and a low percentage of homeowners are classified as low to moderate income households.

Regardless of these qualification criteria, the City supports continued pursuit of available state and federal grant opportunities and remains committed to working with residents, regional partners, and OCFA to expand participation in programs that advance wildfire preparedness and mitigation.

RECOMMENDATIONS

Recommendation R2 – **By December 31, 2026, cities and fire service agencies, including Orange County Fire Authority (OCFA), should commit to participate in a county-wide annual wildfire prevention fair planned by the Orange County Board of Supervisors to showcase wildfire prevention outreach programs.**

Response: The City of Irvine agrees with this recommendation and supports increased county-wide collaboration to address wildfire prevention. The City welcomes the opportunity to participate in an annual fair planned by the Orange County Board of Supervisors to showcase wildfire prevention outreach programs.

Recommendation R3 – **By December 31, 2026, cities, unincorporated areas, special districts, and fire services agencies in High and Very-High Fire Hazard Severity Zones should initiate planning activities to achieve community-level wildfire risk mitigation designations and/or establish a local Fire Safe Council within one year.**

Response: The City of Irvine acknowledges and agrees with the importance of proactive planning to mitigate community-level wildfire risk. The City has a vested interest in mitigating wildfire hazards. As stated in Irvine's 2026 Local Hazard Mitigation Plan, there are 29 municipal critical facilities (i.e., bridges and community centers) and six facilities of concern (i.e., public works and recreational facilities) within these fire hazard zones, representing a potential loss of approximately $37.5 million. In addition to potential facility loss, wildfires can consume power lines and force utility operators to shut off electrical and gas transmission activity, leading to utility outages in City homes and businesses.

The City highlights the Fire Risk Reduction Community List (FRRCL) as potential community-level activity that could be pursued. The FRRCL, managed by the Board of Forestry and Fire Protection, includes local agencies in Very-High Hazard Severity Zones that successfully enforce wildfire best practices (such as building codes, steep slope ordinances, and land use planning). However, the current list (2024), does not include any cities within Orange County as participants. By the end of 2026, the City will look into this program further and determine if the designation would be a good fit for pursuit for the community.

Finally, the City would like to note that it participates in the preparation of the county-wide Community Wildfire Protection Plan (CWPP), a planning document driven by OCFA. Approximately 35% of the city is within the CWPP boundary.

Recommendation R4 – **By December 31, 2026, to ensure city residents are engaged and aware of wildfire risk reduction resources, OCFA member and non-member cities should provide information, develop their own outreach program, and establish a direct contact person(s) for their residents. This is in addition to whatever referrals or references made to OCFA outreach programs.**

Response: The City of Irvine agrees with this recommendation and, since 2018 has implemented a wildfire readiness outreach campaign, *Ready, Set, Go!* Every summer, in preparation for the fall fire season, Irvine partners with OCFA to post banners in high fire risk areas within the City, deliver presentations at town hall meetings, engage citizens at community events with handout materials, and mail informational brochures about emergency alerts, evacuation zones, personal preparedness, vegetation management, and home-hardening recommendations. Additionally, information on this issue is permanently available for review on the City website at *https://cityofirvine.gov/office-emergency-management/wildfire-preparedness*. The City's Office of Emergency Management, led by the Manager of Emergency Services, serves as a direct contact for Irvine residents.

We trust this response from the City of Irvine will be filed with the Orange County Grand Jury so that anyone reading the Grand Jury report will be able to evaluate it in light of Irvine's response set forth above. We appreciate the Grand Jury's attention to this important topic as cities throughout Orange County work to mitigate the impacts of wildfires on their communities.

Thank you for your consideration of this important matter.

Sincerely,

Larry Agran

Larry Agran
Mayor