



OFFICE OF THE GOVERNOR

September 24, 2024

The Honorable Joseph R. Biden, Jr.
President of the United States
The White House
Washington, DC 20500

Through: Robert J. Fenton, Jr.
Regional Administrator
Federal Emergency Management Agency Region IX
1111 Broadway, Suite 1200
Oakland, CA 94607-4052

Dear Mr. President,

Thank you for the federal resources you have authorized for the State of California and its impacted communities through the Fire Management Assistance Grant (FMAG) Program to support responses to the Park Fire (FM-5519-CA) and the Borel Fire (FM-5522-CA).

Under the provisions of Section 401 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. Sections 5121-5207 (Stafford Act), as implemented by Title 44 of the Code of Federal Regulations (44 C.F.R.) Section 206.36, I respectfully request you declare a Major Disaster Declaration (MDD) in the State of California as a result of the wildfires, specifically the Park and Borel Fires, resulting from the Extreme Heat Event that created weather and environmental conditions that significantly exacerbated the ignition and spread of wildfires across the State. Such conditions are representative of those addressed in your administration's recently published National Heat Strategy, which recognized that "heat is increasingly becoming an intersectional and compounding environmental threat along with other climate stressors."¹

¹ [Biden-Harris Administration Unveils National Heat Strategy to Protect Community Health from Extreme Heat | HHS.gov](https://www.hhs.gov/nhsa/press-releases/2023/08/23/biden-harris-administration-unveils-national-heat-strategy-to-protect-community-health-from-extreme-heat)



These fires devastated communities in Butte, Tehama, and Kern Counties. The severity and magnitude of these wildfires supports authorizing all categories of Individual Assistance Programs.

Weather Summary

California experienced two major wildfires, the Park Fire in Butte and Tehama Counties and the Borel Fire in Kern County, during an Extreme Heat Event beginning July 24, 2024, and lasting through August 26, 2024.

The National Oceanic and Atmospheric Administration (NOAA) determined, at the time of both fires' ignition, Butte, Kern, and Tehama Counties were all impacted by the same broad-scale weather system. These conditions resulted in a strong upper level² area of high pressure, creating severe fire-weather conditions, including extremely hot temperatures, with little ability to recover overnight, relative low humidity, and dry lightning strikes across California. This type of weather system is a known pattern of concern for critical fire weather and, as a result, the National Weather Service (NWS) issued two separate Red Flag Warnings on July 25, 2024, for the gusty winds, high temperatures, and low relative humidity conditions.

In Northern California, the periods of extreme heat occurred from June 22 through June 23, 2024, July 1 through July 13, 2024, and July 18 through July 24, 2024. These three periods had a Major (Red)³ HeatRisk in the Sacramento Valley or surrounding foothills as observed by NWS. In De Sabla, the nearest official HeatRisk site to the Park Fire, the hottest days occurred on July 9, 2024, and July 24, 2024, the day of the Park Fire's ignition. Furthermore, in Red Bluff, a community 10 miles from the Park Fire, 23 of the 31 days in July were over 100 degrees, including two consecutive 118-degree days.

In the southern San Joaquin Valley and the surrounding foothills, similar patterns of hot weather occurred from June 22 through June 25, 2024, July 3 through July 13, 2024, and July 20 through July 25, 2024, with the last stretch of extreme heat occurring at the same time as the onset of the Borel Fire. In Bakersfield, the closest official HeatRisk site to the Borel Fire, NWS observed that all the documented extreme heat stretches had a Major (Red) HeatRisk. This same site

² The term "upper level" refers to the portion of the atmosphere that is above the lower troposphere, typically 4-12 miles above the earth's surface.

³ Major (Red) HeatRisk is defined by NWS as a level of heat that affects anyone without effective cooling and/or adequate hydration. Impacts are likely in some health systems, heat-sensitive industries and infrastructure. [NWS HeatRisk \(noaa.gov\)](https://www.noaa.gov/heat-risk).

also documented seven Extreme (Magenta)⁴ HeatRisk days as noted by NWS. Furthermore, in Bakersfield, located 19 miles west of the Borel Fire, 24 of the 31 days in July had documented temperatures of over 100 degrees.

The impacts of this weather event are best illustrated through data released by NOAA confirming California experienced its hottest July ever with an average temperature of 81.7 degrees compared to a 75.2-degree July average over the past 130 years.⁵ However, this is calculated by NOAA using the highest and lowest temperature for each day over a month-long period. In order to fully appreciate the full extent of this Extreme Heat Event, maximum temperatures and record-breaking temperatures must be considered. NOAA, through its National Centers for Environmental Information (NCEI), confirmed California's average maximum temperature for July 2024 was recorded at 96.8-degrees, 6.9-degrees warmer than the 105-year average. Additionally, in early July, four California cities experienced all-time record-breaking highs, with temperatures ranging from 115-degrees to 124-degrees Fahrenheit.⁶

The impacts of this Extreme Heat Event cannot be overlooked, with vulnerable populations being particularly susceptible to its effects. Tragically, this prolonged Extreme Heat Event resulted in 57 confirmed fatalities across California from June 22, 2024, through August 5, 2024.

INCIDENT OVERVIEW AND EMERGENCY RESPONSE

California communities have been repeatedly devastated by disasters this year, for which I have proclaimed 14 States of Emergency. The wildfire season alone has been particularly impactful. Since the beginning of 2024, California has experienced 6,090 wildfire incidents, resulting in more than 988,774 acres burned, far exceeding the five-year average and severely depleting resources at the state and local level. The State Operations Center activated for these wildfires on August 2, 2024, and has been coordinating the deployment of resources to support local communities stretched beyond their capacity. Furthermore, all of the fire-impacted counties proclaimed local emergencies and activated their local Emergency Operations Centers. Since July 1, 2024, California has received 9 FMAG declarations, underscoring the threat of wildfire destruction facing communities across the state.

⁴ Extreme (Magenta) HeatRisk is defined by NWS as a level of rare and/or long-duration extreme heat with little to no overnight relief that affects anyone without effective cooling and/or adequate hydration. Impacts likely in most health systems, heat-sensitive industries and infrastructure. [NWS HeatRisk \(noaa.gov\)](https://www.noaa.gov/news/heat-risk/).

⁵ The NOAA monthly U.S. Climate Gridded Dataset collects the highest and lowest temperatures of the day at each station over the entire month.

⁶ [Assessing the U.S. Climate in July 2024 | News | National Centers for Environmental Information \(NCEI\) \(noaa.gov\)](https://www.noaa.gov/news/assessing-the-u.s.-climate-in-july-2024/)

The extremely high temperatures and other critical weather conditions translated to significant wildfire threat throughout California with little relief, resulting in 24 fires igniting across the state, including the Park and Borel Fires, between July 23, 2024, and July 25, 2024. Of the 24 fires, seven ignited on federal lands, with the Borel Fire being the largest.

Park Fire

On July 24, 2024, the Park Fire ignited in Upper Bidwell Park, located in northwestern Butte County. The fire began rapidly moving north toward the Town of Cohasset, threatening the communities of Chico, Forest Ranch, Richardson Springs, and the Town of Paradise, which was decimated by the 2018 Camp Fire and has been recovering ever since. Due to the Park Fire's rapid spread, an FMAG was approved by FEMA just 8 hours after ignition. The fire was exacerbated by hot, dry, and windy conditions caused by the statewide Extreme Heat Event, which resulted in the Park Fire growing to 45,550 acres in just 20 hours and quickly spreading into neighboring Tehama County. The Park Fire continued to exhibit extreme fire behavior, which led to evacuation orders spanning across four counties, including Butte, Plumas, Shasta, and Tehama Counties.

The days following its start brought no relief from the extreme heat, low humidity, and wind, that allowed the Park Fire to rapidly increase in size. As a result of the Extreme Heat Event, on July 25, 2024, NWS issued a Red Flag Warning for the following 34 hours for Butte and Tehama Counties. On July 27, 2024, 56 hours after its ignition, the Park Fire had grown to 307,369 acres, equating to an average burn rate of 5,489 acres per hour.

The east side of Tehama County, specifically the rural communities of Campbellsville, Mill Creek, Paynes Creek, Mineral, and Dales, were quickly threatened by the extreme fire activity, resulting in FEMA's approval of another FMAG on July 27, 2024. The Park Fire continued to grow and, just 10 days after ignition, had burned 400,956 acres. Despite the commitment of state, local, and federal resources, the fire remained active and burned an additional 28,504 acres before it reached 75 percent containment on August 26, 2024. As of September 12, 2024, the Park Fire had burned a total of 429,603 acres, making it the fourth largest wildfire on record in California.

At the Park Fire's peak in Butte County, 4,447 people were under mandatory evacuation orders, 19,860 people were under evacuation warnings, and 149 people and 95 animals were seeking assistance at shelters and evacuation centers. In Tehama County, 1,138 people were under evacuation orders and 963 people were under evacuation warnings, with 21 people and 47 animals

utilizing evacuation shelters as a direct result of the complete closure of State Routes 32 and 36. As these highways are the primary connection between the east and west sides of Tehama County, their closure made evacuations, travel to gather essential resources, and attempts to seek assistance or other support difficult.

Borel Fire

The Borel Fire ignited on July 24, 2024, in Kern County and quickly began burning east towards the communities of Havilah and Meadows Ranches. The above average temperatures, low relative humidity, and strong winds, brought on by the Extreme Heat Event, fueled the fire's expansive destruction. As a result, NWS issued Red Flag Warnings in Kern County from July 25, through July 27, 2024. On July 26, 2024, Kern County was approved for an FMAG for the Borel Fire, which had grown to 7,910 acres in size. Over the next 72 hours, the Extreme Heat Event and its resulting weather system moved further south, worsening the fire conditions for Kern County. As a result, the total acreage for the Borel Fire increased to 53,010 acres by the morning of July 29, 2024. Once the extreme heat conditions subsided, firefighters and crews were able to manage the further spread of the Borel Fire, which already burned 59,340 acres before it reached 75 percent containment on August 7, 2024. The Borel Fire has burned a total of 59,392 acres, and as of September 12, 2024, was 95 percent contained.

At the Borel Fire's peak, 2,365 people were under mandatory evacuation orders and 3,570 people were under evacuation warnings, with 38 residents and 67 animals utilizing shelters and evacuation centers. As a result of road closures, evacuation efforts became more difficult. State Route 178 is the main highway connector to some of the most rural and rugged parts of Kern County. The highway's complete closure limited direct access for remote communities, forcing survivors to seek alternative paths to safety.

Emergency Response

Pursuant to the California Emergency Services Act, I proclaimed a State of Emergency to exist in Butte and Tehama Counties due to the Park Fire on July 26, 2024, and in Kern County due to the Borel Fire on July 30, 2024. These proclamations included a variety of provisions in response to the impacts of the Park and Borel Fires, including activation of the State Emergency Plan.

Additionally, a combined total of 8,235 personnel, 32 helicopters, 513 engines, 188 dozers, 180 water tenders, 144 hand crews, and 129 other resources were deployed in response to the Park and Borel Fires.

California state agencies that responded to the impacts of these fires included the California Department of Forestry and Fire Protection (CALFIRE), California

Governor's Office of Emergency Services (Cal OES), California Department of Social Services (CDSS), California Department of Veterans Affairs (Cal Vet), California Department of Insurance (CDI), Contractor's State License Board, Department of Motor Vehicles (DMV), California Department of Public Health (CDPH), the Employment Development Department (EDD), California Air Resources Board (CARB), California Franchise Tax Board, and the California Department of Housing and Community Development. The assistance provided by these state agencies included, but is not limited to, fire suppression and response activities, sheltering, resource coordination, evacuation support, air quality monitoring, and support to the access and functional needs population.

Along with assistance from state agencies, voluntary organizations such as the American Red Cross, the Salvation Army, and many more have been actively assisting survivors. Each of the affected counties opened Local Assistance Centers and served a combined total of 1,987 households and provided a total of 11,260 services to the impacted communities.

Specifically, the Park Fire Voluntary Organizations Active in Disaster (VOADs) have been coordinating services such as a user-friendly website to connect survivors to current resources, sheltering and financial assistance, personal property recovery, and a communication channel to share resources. These VOADs have also donated supplies to communities such as clothing, household goods, clean-up buckets, and hygiene and school kits to aid survivors moving back to their homes. These resources serviced the affected communities in Butte and Tehama County.

Additionally, in Kern County, voluntary organizations such as the American Red Cross, the Cal Fire Foundation, Restore Education After Disaster, and many more have assisted those affected by the Borel Fire. The Borel Fire VOADs have been coordinating services, such as delivering water, providing case workers to assist survivors seeking shelter, standing up shelters, and providing financial assistance, including immediate relief grants and financial assistance grants.

IMPACTS TO POPULATION AND COMMUNITY INFRASTRUCTURE

Vulnerable communities throughout Butte, Kern, and Tehama Counties were devastated by the Park and Borel Fires, as evidenced by the Preliminary Damage Assessments (PDAs) conducted by the State of California, FEMA, and the U.S Small Business Administration (SBA), which began on August 28, 2024, and concluded on September 17, 2024.

Emergency work and damages, including debris removal and cleanup, present a significant financial burden for the State of California, as much of these costs will not be covered under the FMAGs for the Park and Borel Fires.

Butte County: After Joint-PDAs concluded on September 5, 2024, it was determined that 250 homes were destroyed, 1 suffered major damage, 2 suffered minor damage, and 18 were affected.

In Butte County, an estimated 60 percent of homeowners have personal property insurance or homeowners' insurance. On average, it will cost \$417,300 to rebuild a typical Butte County home. However, the total uninsured rebuild costs are \$44,233,800, resulting in the full financial burden for these costs being placed on residents in Butte County. Furthermore, mobile homes are even more susceptible to environmental hazards. The county has a mobile home rate of 11.05 percent, which is nearly eight percent higher than the state average of 3.58 percent.

As a result of the homes destroyed and rendered uninhabitable by the Park Fire, the demand for temporary and permanent housing for survivors will surge. The increase in displaced residents will further strain the County's resources, making it even more challenging to meet the regional housing needs identified by the Butte County Association of Governments (BCAG) in June 2020. The BCAG needs assessment anticipated the need for over 15,000 new housing units by 2030, and the destruction caused by the Park Fire will not only increase this number, but also place additional pressure on local government and agencies to expedite the development of new housing for survivors. The Park Fire's impact will particularly affect the very low and low-income households, who are already struggling to secure affordable housing.

The small Town of Cohasset, a census-designated community near the City of Chico in Butte County, whose population is nearly 400, was significantly impacted and partially destroyed by the Park Fire. One extended family in Cohasset lost six homes in the Park Fire alone. Another family, who fled the town of Paradise six years ago during the 2018 Camp Fire and relocated to Cohasset, lost their home once again due to the Park Fire.

Butte County has an overall ranking of 0.83 in the Centers for Disease Control and Prevention (CDC) Social Vulnerability Index (SVI), indicating the population is extremely vulnerable to experiencing adverse impacts from disasters. Within the county, 17 percent of people are living below the poverty level, compared to the national average of 11.5 percent. Furthermore, the median household income for Butte County is \$66,085⁷, compared to the federal median household income of \$75,149. According to the Council on Environmental

⁷ All insurance and median household income information is derived from 2022 Census data.

Quality's Climate and Economic Justice Screening Tool, the affected areas within Butte County rank nationally in the 99th percentile for expected economic loss to agricultural value and the 95th percentile for expected economic loss to building value, both as a result of natural hazards. Additionally, the areas of Butte County most impacted by the Park Fire are ranked in the 92nd percentile for projected wildfire risk.

Despite a high vulnerability to wildfire risk, Butte County and its residents have been strengthening mitigation efforts to minimize wildfire risk. According to the local Fire Safe Council, 56 of the 250 homes directly impacted and lost to the Park Fire were attempting to participate in a voluntary program to mitigate risk to structures in the area. In Cohasset, 163 landowners signed up to participate in the voluntary hazard tree removal project. Unfortunately, Butte County and the surrounding communities continue to be impacted by a successive cycle of disaster response and structure loss, making it difficult to even begin implementing mitigation measures.

In 2024 alone, Butte County has been impacted by 14 fires and received two FMAG declarations in the same month. These 14 fires combined have burned 435,435 acres and destroyed 752 structures. Adding to the compounding impacts from this season, between 2014 and 2024, fires have burned nearly 40 percent of Butte County, from which the County is still recovering. The most impactful fires during this period were the 2018 Camp Fire, 2020 North Complex Fire, and the 2021 Dixie Fire, all of which received Major Disaster Declarations.

The impacts of the 2018 Camp Fire, the deadliest and most destructive wildfire in California's history, remain a challenge for residents who are still recovering. It resulted in the deaths of 85 people and destroyed approximately 19,000 structures. Officials in Butte County reported in November 2023 that only 21 percent of homes that were lost during the Camp Fire had been rebuilt, and about 1,000 more homes were currently under construction. The Park Fire threatened to level those homes once again.

Of the top 20 largest wildfires in California history, Butte County has been at the center of three of the largest, three of the most destructive, and two of the deadliest. All of these catastrophic fires occurred within three years of one another, meaning the County has repeatedly faced devastating new fires while still trying to recover from previous ones. As a direct result, Butte County has seen a 6 percent total population decline since 2018 due to the struggles the community faces while attempting to recover amidst a constant cycle of devastation.

Tehama County: Although the fire began in Butte County, the Park Fire quickly spread to and decimated communities in neighboring Tehama County. Of the

429,603 total acres burned from the Park Fire, roughly 375,000 acres were located in Tehama County.

The Red Bluff-Tehama Chamber of Commerce reported that Lassen Volcanic National Park has been completely closed due to the fire since July 27, 2024, and is currently in a "phased re-opening" process. As half of the park's 600,000 visitors come during the summer months, the Chamber has reported that closures due to the Park Fire have cost an estimated 100,000 visitors during the month of August, as well as a total economic impact of \$30 million. Additionally, the Chamber reported closures of approximately 60 businesses ranging from vineyards, farms, retail stores, small businesses, lodging, logging, and other services. These closures impact approximately 1,500 people and 500 employees, costing an estimated \$6.5 million in lost revenue, which is half of these businesses anticipated \$13 million in annual revenue.

The fire also recently reached the Mill and Deer Creek watersheds in Tehama County, posing a threat to the region's Spring Run Salmon population, which is already nearing extinction. Unfortunately, the community and local jurisdictions lack the resources to restore or rehabilitate these species.

After Joint-PDAs concluded on September 17, 2024, it was determined that 108 homes were destroyed, and one was affected.

In Tehama County, an estimated 63 percent of homeowners have personal property insurance or homeowners' insurance. On average, it will cost approximately \$393,120 to rebuild a typical Tehama County home, and the total uninsured rebuild costs are \$23,563,613, resulting in the full financial burden for these costs being placed on residents in Tehama County. Additionally, the county's mobile home rate is 16.03 percent, which exceeds the state average by over 12 percent.

In addition, the Park Fire has significantly exacerbated the housing challenges already present in Tehama County, where there has been a need for additional housing units across various income levels. Prior to the onset of the fire, Tehama County's Regional Housing Need Determination published in June 2023 indicated that between June 2024 and June 2029, 1,046 new housing units will be needed to adequately support the community⁸. The devastation caused by the fire has exacerbated this need, making it more difficult to meet the projected housing requirements of the community.

Tehama County has an overall SVI ranking of 0.93 according to the CDC, which places the community at an extremely high risk of experiencing adverse impacts from disasters. In Tehama County, 16 percent of people are living below

⁸ [Final Regional Housing Need Determination and Plan \(ca.gov\)](#)

the poverty level compared to the federal average of 11.5 percent. Additionally, the median household income for Tehama County is \$59,029, compared to the federal median of \$75,149. The Council on Environmental Quality's Climate and Social Justice Screening Tool identified Tehama County as disadvantaged, meaning it meets more than one burden threshold and the associated socioeconomic threshold. Tehama County ranks in the 99th percentile for expected economic loss to agricultural value resulting from natural hazards each year, the 90th percentile for projected wildfire risk, the 74th percentile for low-income residents, and the 90th percentile for unemployment. Furthermore, at least 10 percent of Tehama County residents have not received their high school diploma.

The FEMA National Risk Index places Tehama County in the relatively low category for community resilience, meaning the community faces significant challenges in recovering from disasters. This is most evident through Tehama County's wildfire impacts from 2014 to 2024, in which nearly 40 percent of Tehama County land has been burned by wildfires.

Kern County: The Borel Fire has devastated the historic mining community of Havilah, which was established in the 1860s, leveling nearly the whole town. The fire destroyed a local museum and 150 homes in the area. The Havilah Museum was housed in a historic courthouse and was destroyed in the fire along with all its contents, records, and artifacts. This represents a significant cultural and educational loss for the community and, without reconstruction, would mean the historic and cultural significance that gave the town its identity will be forever lost.

After Joint-PDAs concluded on September 5, 2024, it was determined that 150 homes were destroyed, 1 suffered major damage, 4 suffered minor damage, and 12 were affected.

The impacts of wildfire smoke cannot be ignored, especially among first responders and more vulnerable populations. The American Heart Association reports that wildfire smoke inhalation increased the risk of out-of-hospital cardiac arrest by up to 70 percent in California. In Kern County, the poor Air Quality Index as a result of the Borel Fire caused school closures and disruption of the Expanded Learning Opportunities Program (ELOP), a program for students in kindergarten through sixth grade. These programs are pupil-centered and are designed to complement daily classroom learning. The closure of the program has eliminated a safe space for continued child development and daycare services for working families.

In Kern County, an estimated 63 percent of homeowners have personal property insurance or homeowners' insurance. On average, it will cost

approximately \$406,120 to rebuild a typical Kern County home, and the total uninsured rebuild costs are approximately \$19,233,843, resulting in the full financial burden for these costs being placed on the residents in Kern County. Furthermore, the mobile home rate in Kern County is 7.44 percent, almost four percent higher than the California average.

The Borel Fire has had a significant impact on the county's already urgent housing needs, as outlined in the Regional Housing Need Determination for the period from June 30, 2024, through June 30, 2029. With Kern County facing a projected need for 1,046 homes across various income categories, the destruction caused by the Borel Fire will further strain the availability of housing and exacerbate existing shortages.

Kern County has the highest SVI score of the affected counties, and the second highest in the state, with an overall ranking of 0.97 according to the CDC, placing the community near the highest risk of experiencing adverse impacts from disasters to include disproportionate death, injury, and loss. Within the County, 18 percent of residents have limited English proficiency and 11 percent have a disability. Additionally, 19 percent of residents live under the poverty level, compared to the federal mark of 11.5 percent. Kern County's median household income is \$63,883, compared to the federal median of \$74,580. According to the Climate and Economic Justice Screening Tool, Kern County was identified as a disadvantaged community, placing in the 90th percentile for poverty, the 84th percentile for the number of low-income residents, the 94th percentile for projected wildfire risk, and the 98th percentile for low life expectancy among residents. Additionally, at least 16 percent of Kern County residents do not have their high school diploma.

The FEMA National Risk Index places Kern County in the lowest category for community resilience, meaning the community faces significant challenges in recovering from disasters. In recent years, Kern County has experienced several notable disasters including the 2021 French Fire, 2023 Tropical Storm Hilary, and the 2019 Ridgecrest Earthquake Swarm. Kern County has also seen an increase in fire activity over the past five years, as increased temperatures and drought conditions continue to contribute to the frequency and intensity of fires in the region.

Acute Impacts on Vulnerable Communities

Overall, the communities impacted by the Extreme Heat Event and resulting wildfires are economically disadvantaged and socially vulnerable. According to the FEMA Geospatial Resource Center for insurance coverage, \$52,379,566 of the total home damage is uninsured. On average, the three counties are estimated to be underinsured by 68 percent. The total rebuild costs for uninsured and underinsured homes is \$112,460,069. After accounting for the average

home insurance coverage amount for each county, there is a total underinsured deficit of \$60,080,503 (approximately 46 percent of the total cost and about \$263,000 per home) that will not be covered by home insurance and left to homeowners to bear.

These wildfires have completely destroyed a significant number of primary residences, in jurisdictions that already lack affordable housing and are significantly underinsured, rendering many survivors without homes and the necessary resources to recover.

Individual Assistance (IA) Reforms

On March 22, 2024, FEMA's implemented significant reforms to its IA program, which are intended to help survivors recover from disasters faster and more equitably. As such, I urge FEMA to take the necessary steps to ensure that the projected costs for new program areas such as Displacement Assistance, Serious Needs Assistance, Computing Device Assistance, Self-Employed Applicants Assistance, and Home Repairs and Improvements for Survivors with Disabilities, are fully considered when estimating the cost of assistance and assessing the unmet need for survivors of these fires. Furthermore, when evaluating this request for an MDD, I request consideration of the criteria outlined below.

I request FEMA use specific hazard types when calculating the estimated cost of assistance, as fires are inherently more destructive and costly compared to other hazards. This is evidenced by comparing Other Needs Assistance (ONA) awards from recent California fires to recent storm and flood events. The data indicates that ONA awards for fires are approximately four times higher than floods and storms, and this should be taken into consideration when estimating costs in order to provide equitable considerations for states with significant wildland fire threats. Recent FEMA damage assessment guidance sets expectations for states and local governments to use localized community-specific data when assessing impacts. I ask that FEMA would show similar intent to project accurate costs by using data relevant to the disaster type.

Disaster Type	Avg IHP	Avg HA	Avg ONA
Fire	\$11,463	\$10,446	\$4,905
Flood/Storm	\$7,319	\$9,268	\$1,245

Based on DRs 4407, 4558, 4569, 4610 (fires), and 4683, 4699, 4758 (storms/floods)

Additionally, when evaluating this request, FEMA should consider the significant number of underinsured disaster survivors who were previously ineligible for FEMA programs but will now be able to receive assistance under the IA reforms. As you know, an increasing number of Californians have been unable to obtain fire

insurance in recent years, and those that have are not fully covered for the actual cost of recovery.

According to a report by the California Department of Insurance (CDI), in 2022, both Tehama and Butte Counties had more non-renewed policies than new policies. Furthermore, CDI's observations statewide indicate an overall upward trend from 2015-2021 in the number of policies not being renewed, initiated by both insurance providers and consumers.⁹ An average of four recent California-specific disaster studies indicate that 68 percent of insured fire survivors were significantly underinsured in fire events going back to 2015, which should be reflected when estimating the number of eligible FEMA applicants for this event.

Year / Fire Event	% Underinsured	Avg \$ Amount of Underinsurance	Survey Size
2015 Butte / Valley	59%	\$103,000	580
2017 North Bay	64%	\$367,000	1240
2018 Camp	66%	\$203,000	627
2020 Wildfires	82%	\$375,000	212
Average Underinsurance		68%	

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I commend FEMA for making positive changes to their IA program and request that FEMA update its traditional declaration evaluation criteria to fully reflect the updated survivor-centric programs and the newly eligible underinsured disaster survivors who are not considered under the current evaluation process. The challenge of underinsurance is far greater for fire survivors when compared to floods and other hazards, as completely rebuilding homes after the total destruction of a fire can take years due to the time and costs of removing hazardous debris and trees from the impacted community. Moreover, with weather conditions rapidly intensifying due to climate change, wildland fires are no longer solely a threat for the western states. This is evidenced through FEMA's increased approval of FMAG declarations, in both western¹¹ and non-western states, since 2019.¹² Additionally, both Minnesota and Tennessee requested an MDD as a result of fires, further indicating this threat to non-western states.

For the reasons above, I urge FEMA to adjust its system of evaluating disaster impacts to ensure that all disaster survivors are treated equitably. As FEMA

⁹ CDI FACT SHEET: Data on Insurance Non-Renewals and FAIR Plan (ca.gov)

¹⁰ Surveys - United Policyholders (uphelp.org)

¹¹ "Western states" are defined as those that are members of the Western Fire Chiefs Association - <https://wfca.com/>

¹² Disasters and Other Declarations | FEMA.gov

Administrator Deanne Criswell stated, "First, we must instill equity as a foundation of emergency management. Systems that foster inequality serve no one, especially in times of crisis. We must recognize that disasters affect individuals and communities differently, commit ourselves to reducing barriers to access, and deliver equitable outcomes for all whom we serve."

STATE FISCAL IMPACTS

California has committed to supporting Butte, Kern, and Tehama Counties through a state-led Private Property Debris Removal program. To date, it is estimated that this program will cost roughly \$70 million in Debris Removal as well as Assessment and Monitoring activities, averaging approximately \$23.34 million per county.

Since the beginning of 2022, I have requested, and you have supported, 5 Major Disaster Declarations, and California has experienced an additional 17 state-only events for which I have proclaimed a State of Emergency and authorized California Disaster Assistance Act funds. To date, these disasters have cost nearly \$4 billion.

Following the stock market run-up through the end of 2021, asset prices dropped in 2022, with the S&P 500 declining by 19 percent and the NASDAQ Composite Index declining by 33 percent. The state's Big Three General Fund revenue sources—personal income, sales, and corporation taxes—declined by 21 percent in 2022-2023 after increasing by a remarkable 55 percent from 2019-2020 to 2021-2022. This sharp reduction in revenues required the state to lower estimated projections going forward.

The 2024-25 Budget Act addressed a \$46.8 billion deficit through a mix of spending reductions, delays, the use of reserves, internal borrowing, and other solutions. It not only built a positive reserve for 2024-25 but did so for the following budget year, 2025-26, placing the state on a more sustainable fiscal path and mitigating the risk of cuts to core programs .

Certification

I certify for this Major Disaster Declaration request that the State and local governments will assume all applicable non-federal shared costs as required by the Stafford Act. I have designated the Director of Cal OES, Nancy Ward, as the Governor's Authorized Representative (GAR) and State Coordinating Officer for this request. Director Ward is empowered to execute on behalf of the State all necessary documents for federal assistance and will work with FEMA in continuing to provide more information or justification on my behalf.

Conclusion

As established by the information set forth above, the most significant impacts of these devastating wildfires have been to the most vulnerable communities and counties within California. As such, I request a Major Disaster Declaration authorizing the Individual Assistance Programs, specifically the Individuals and Households Program, Disaster Case Management, Crisis Counseling Assistance and Training Program, Disaster Legal Services, Disaster Unemployment Assistance, Voluntary Agency Coordination, and Hazard Mitigation, Statewide, U.S. Small Business Administration Disaster Loans, funds from the U.S. Department of Agriculture Emergency Loan Program, the Cora Brown Fund, and any other appropriate Stafford Act disaster assistance programs.

Although not presently requested, California reserves the right to amend this request to add additional federal programs, such as Public Assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gavin Newsom', with a long horizontal flourish extending to the right.

Gavin Newsom
Governor of California

Enclosures 13:

Federal Form 010-0-13

Enclosure A for Individual Assistance

Enclosure C Requirements for Other Federal Agency Programs

National Weather Service – Weather Summary

National Weather Service – Extreme Heat Event Weather Summary

NOAA Statewide and County Maximum and Average Temperature Ranks

Per Capita Income Data by CDP

Underinsurance Rates by County

Homeownership, Renter-Occupied, and Insurance Rate by County

Insurance Estimates by County

Vulnerable Populations, General Population Demographics, & SVI by County

24 Months Stafford Act and State Declarations

List of Federally Recognized Tribes