

VanSusteren, Jane@CALFIRE

From: Kerri Timmer <ktimmer@placer.ca.gov>
Sent: Friday, August 30, 2024 5:40 PM
To: Public Comments@BOF
Cc: Joel Joyce; Joshua Huntsinger
Subject: ATTN: Regulations Priority Review, Board of Forestry re: FRRCL

Warning: this message is from an external user and should be treated with caution.

To Whom It May Concern: I have a question regarding the specific impact on Wildfire Prevention local assistance grant applications and rate-setting by insurance companies for communities designated as Fire Risk Reduction Communities under the Board of Forestry and Fire Protection's Fire Risk Reduction Community List (FRRCL) program.

Placer County was pleased to be deemed eligible for addition to the FRRCL list for 2024. However, the codes governing use of the list lack specificity as to what FRRCL communities should expect as a result of being on this list. We appreciate receiving priority for Wildfire Prevention Grant applications, but there is no description of how the prioritization will be determined nor how it will be applied to scoring competitive applications submitted by FRRCL community applicants. Similarly, the requirement for insurance companies to "reflect" FRRCL designation in rate-setting, as outlined in CCR Title 10. Investment, Chapter 5. Insurance Commissioner, Subchapter 4.8. Review of Rates, Article 4. Determination of Reasonable Rates, Section 2644.9. Consideration of Mitigation Factors; Wildfire Risk Models, is equally vague.

I respectfully request that the Board of Forestry clarify the prioritization process for Wildfire Prevention Grant applications and require details from the Insurance Commissioner as to how insurers must reflect community-level mitigation designations like FRRCL in their rate-setting, and include both clarifications in its FRRCL application information and other documentation.

Sincerely,

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