



PIMA COUNTY BOARD OF SUPERVISORS

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Stephen W. Christy
Supervisor, District 4

MEMORANDUM

DATE: May 16, 2024

TO: Melissa Manriquez
Clerk of the Board

FROM: Steve Christy 
District 4 Supervisor

SUBJECT: Agenda Addendum Item

Please place the following item on the Addendum to the Agenda for the Board of Supervisors meeting of May 21, 2024:

BOARD OF SUPERVISORS

Discussion/Direction/Action by the Board of Supervisors directing correspondence to Governor Hobbs and the Arizona Dept. of Insurance and Financial Institutions Director as to the actions that can be taken by them to address the lack of access to affordable dwelling insurance in wildfire prone areas throughout Pima County. (District 4)

Thank you.



MEMORANDUM

Date: May 14, 2024

To: The Honorable Chair and Members
Pima County Board of Supervisors

From: Jan Leshner 
County Administrator

Re: **Lack of Access to Affordable Dwelling Insurance in Wildfire Prone Areas**

At the May 7, 2024, meeting of the Board of Supervisors, Supervisor Christy asked what proactive steps are being taken to address the lack of affordable dwelling insurance in wildfire prone areas. During that meeting, a District 4 constituent spoke to the Board about specific concerns of those who own homes and businesses on Mount Lemmon. A letter from the Mt. Lemmon Homeowners and Business Economic Associations identified several key points that must be considered including availability, affordability, coverage gaps and the impact on property values. Supervisor Scott also noted that District 1 residents in the urban interface zones such as Catalina area are also impacted by lack of access to insurance.

Pima County recognizes that the increase in the number and intensity of wildfires has resulted in increased costs, not only in terms of efforts to prevent or control fires but in the loss of homes, businesses and associated buildings or property.

The following summarizes some of the efforts currently being conducted by Pima County to address this critical issue.

Legislative Efforts

Pima County's Legislative Agenda for 2024 encourages the continued and adequate funding of the Arizona Department of Forestry and Fire Management (DFFM), which is critical to the emergency response to post-fire floods in Pima and many other counties. One example is Arizona House Bill 2001 dedicated to assist private and public landowners with emergency infrastructure repairs for infrastructure damaged as a result of wildfires or wildfire suppression activities. Funding from this bill assisted Pima County departments with a number of projects and local fire departments with much needed equipment to aid in response.

Historically, Pima County and our local partners have received significant funding from the State to assist with the response to fire emergencies. It was noted when the Legislative Agenda was adopted that continued funds to support counties and our communities in the future will be critical, especially when these emergencies do not meet the criteria for declared emergencies and the mechanisms of funding that could become available. When the result of a wildfire meets criteria, Pima County has been the recipient of FEMA Fire Management

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Assistance Grant like during the Bighorn Fire or for devastating fire federal funding under a federal Declaration of Emergency.

Additionally, we are reviewing the California FAIR Plan. Established by State statute (California Insurance Code) the California FAIR Plan Association was created to meet the needs of California homeowners who were unable to find insurance in the traditional marketplace. The FAIR Plan is not a state agency, nor is it a public entity.

All licensed property/casualty insurers that write basic property insurance are required by California's Insurance Code to be members of the FAIR Plan. The FAIR Plan issues policies on behalf of its member companies. Each member company participates in the profits, losses and expenses of the Plan in direct proportion to its market share of business written in the state. We will explore the possibility that such an entity could be developed in Arizona to provide coverage for rural and urban customers.

In alignment with the FAIR Plan, California's Department of Insurance announced a regulation requirement that insurers provide discounts to consumers that qualify under the 'Safer from Wildfires' framework. This legislative requirement was directed in 2022 in response to increasing wildfires, and subsequent insurance increases to residents and businesses. This legislation also details that rate filings align with a property's 'wildfire risk score' and provides the consumer the opportunity to appeal that score. This policy shift provides an opportunity to incentivize insurers, and create fair rates, based on protections the individuals and businesses can do for the immediate structure and surroundings, and employing community-wide measures to reduce wildfire risk.

Notably, there has been increasing interest in creating legislative protections for insurance holders pertaining to wildfire risk. In Spring 2024, federal legislation, H.R. 7462 directed the Government Accountability Office (GAO) to conduct a national study regarding insurance coverage for damages from wildfires. This study seeks to look at not only wildfire risk, but comprehensively address insurance cost trends, rate increases, insurance drops and non-renewal, and / or curtailing of coverage. This study will directly inform actions that have (or can be taken) by State insurance regulatory agencies and protection opportunities for policyholders.

Arizona Department of Insurance and Financial Institutions.

The Arizona Department of Insurance and Financial Institutions (DIFI) assists with and ensures regulatory compliance by Insurance Companies operating in Arizona. While the Department cannot mandate coverage, it does strive to ensure that area residents are aware of policy terms and conditions and that insurance consumers understand their rights under their policies.

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In Arizona, as in other western states, the rise in wildfires has caused a rise in the number of questions homeowners are asking about wildfire insurance coverage. DIFI can help residents know if their insurance covers wildfires or if they are covered if they own a condominium or rent property. The Department can also help residents learn if they have enough insurance to rebuild or what they might do if they cannot get coverage.

Community Education and Wildfire Mitigation Efforts

The Office of Emergency Management provides annual public education prior to the onset of fire season. The Communications Department will assist to ensure community-wide dissemination of the message. The first steps are simply to ensure residents are aware of available resources including the National Fire Protection Association's [Firewise Band Together Toolkit](#), [Prepare for Wildfire – DISASTERSAFETY.ORG](#), [National Wildfire Coordinating Group | National Interagency Fire Center \(nifc.gov\)](#) and information provided by FEMA.

Please see the attached report, which is the comprehensive and detailed description of the County's wildfire mitigation efforts and wildfire response partnerships. The core tenets of emergency management are preparedness, prevention, response and recovery (such as insurance), detailed herein. The County will continue to partner with federal, state, and local agencies to respond to wildfire, and mitigate risk through comprehensive strategies focused on community safety.

There are a number of members of the Arizona State legislature that have also been increasingly concerned with the accelerating costs and lack of availability of fire insurance. Michael Racy, the County lobbyist, will continue ongoing efforts with Representative Stahl-Hamilton and others including the State Department of Insurance.

JKL/anc

Attachment

c: Carmine DeBonis, Jr., Deputy County Administrator
Francisco García, MD, MPH, Deputy County Administrator and Chief Medical Officer
Steve Holmes, Deputy County Administrator
Sarah Davis, Senior Advisor, Pima County Administrator's Office
Shane Clark, Director, Office of Emergency Management
Mark Evans, Director, Communications Office



MEMORANDUM

Date: May 14, 2024

To: Jan Leshner
County Administrator

From: Sarah Davis 
Senior Advisor

Re: **Pima County Wildfire Protection & Preparedness**

Introduction

Pima County is dedicated to protecting the region from wildfire risk and engaging a large partner network to respond to direct wildfire protection. Annually, the wildfire risk levels for the region continue to be exacerbated by increasing temperatures, increasing land area impacted by a greater diversity of invasive plants, longer periods with drought conditions, and more severe storms resulting from climate change. Pima County has been included in 17 state-federal wildfire disaster declarations¹. As detailed in the [February 5th memorandum](#) to the Board of Supervisors, there have been directed, and ongoing, multidisciplinary efforts to mitigate the risk of wildfire in the region.

In 2020, the Coronado National Forest's Bighorn Fire (the eighth-largest wildfire in Arizona's history, burning over six weeks and spanning over 120,000 acres) in the Santa Catalina Mountains was exacerbated by compounding risk factors – specifically, a hot, dry summer and the presence, and growth of, invasive species (grasses) across the mountain ranges southern slopes. This was one of the largest fires in the region in recent years and, while caused by natural causes (lightening), was exacerbated by high-fuel conditions – specifically, dry brush and invasive grasses, and extremely dry and hot conditions. It is estimated that across Arizona in 2023 - of the 1,837 fires on State, Federal, and Tribal lands burned 188,000 acres - 71% were determined to be human-caused².

While there are contributing factors that are climate-related, there are steps that the community can take to prevent wildfires, and the exacerbation of rapidly moving fires. Wildfire mitigation, management and prevention activities span across County departments, and are intrinsically supported through comprehensive communication strategies and partnership across jurisdictions, stakeholders, and the community.

Background: Understanding Wildfire Response

Wildland fire management in the United States is a complex task that involves multiple federal agencies, each with a specific role in addressing the various aspects of wildfires. The U.S. Forest Service, for instance, has launched a comprehensive 10-year strategy to confront the

¹ Pima County 2022 Multi-Jurisdictional Hazard Mitigation Plan

² Arizona Department of Forestry and Fire Management. 2024 Fire Outlook.

wildfire crisis, focusing on creating resilient landscapes, developing fire-adapted communities, and ensuring safe and effective wildfire response³

Similarly, the U.S. Fish and Wildlife Service (Service) manages fire to improve land conditions and reduce the risk of damaging wildfires, using fire as a conservation tool to maintain productive wildlife habitat⁴.

The Department of the Interior also plays a crucial role through its bureaus, including the Bureau of Indian Affairs, the Bureau of Land Management, the National Park Service, and the U.S. Fish and Wildlife Service, each contributing to the overall policy and implementation of wildland fire management⁵ ⁶. These efforts are coordinated under a National Cohesive Wildland Fire Management Strategy, which is a collaborative approach with federal, tribal, state, and local partners to address the challenges posed by longer fire seasons, larger fires, and more extreme fire behaviors. This strategy underscores the importance of partnership and innovation in managing wildland fires across the nation.

This comprehensive approach is mirrored by the Arizona Department of Forestry and Fire Management (DFFM), which provides fire protection to over 22 million acres of State Trust and private lands. The DFFM's role extends beyond suppression efforts; it also encompasses prevention and education to mitigate the impact of wildland fires. Through cooperative agreements, the DFFM works alongside other jurisdictions to manage and suppress fires, reflecting a nationwide commitment to protecting communities and ecosystems from the threat of wildfires⁷

Pima County Wildfire Protection Plan

Pima County Office of Emergency Management (OEM) oversees the development and monitoring of the County's Wildfire Protection Plan (CWPP), and the convening of other critical agencies and stakeholders. The most recent version of the CWPP is over ten years old, and OEM has submitted a grant application through a funding opportunity through the USDA Forest Service Community Wildfire Defense Grant Application to facilitate the update of the new CWPP for the County. The CWPP is a comprehensive strategic plan developed collaboratively by local, state, and federal agencies along with other stakeholders in the wildland urban interface. The CWPP outlines recommends wildfire risk reduction measures to protect people, property, and natural and cultural resources.

It is estimated that areas within Pima County have a greater wildfire likelihood than 50% of other counties in Arizona due to drought conditions, fire fuel, and increasing likelihood of

³ USDA US Forest Service. Wildland Fire Resource. <https://www.fs.usda.gov/managing-land/fire>

⁴ US Fish and Wildlife Service. Fire Management. <https://www.fws.gov/program/fire-management>

⁵ US Government Accountability Office. Wildland Fire Management. <https://www.gao.gov/wildland-fire-management>

⁶ US Department of the Interior. Wildland Fire Policy. <https://www.doi.gov/wildlandfire/policy>

⁷ US Department of Forestry and Fire Management. <https://dffm.az.gov/fire>

extreme climate events (storms and heat).⁸ This funding would allow for development and implementation of a new CWPP in collaboration with federal and state partners, local jurisdictions and responders, and community stakeholders to develop a new plan that will inform strategies which promote fire-adapted, and prepared community. Notably, this plan will fortify the analysis of risk within the region, and wildfire risk mitigation. Grant award notifications are due to be released in late Spring 2024.

County Efforts to Recognize (and address) Invasive Plants in Wildland Fire Risk

As detailed in recent action by the County Administrator's Office, the County stood up an interdepartmental group to take our first comprehensive assessment of the risks posed by the increase in number and extent to invasive plants such as *Buffelgrass* and *Stinknet*. The interdepartmental team is now working to identify priority plant species; determine risk of invasive species prevalence to humans, infrastructure, and natural environment; develop GIS workflows to empower data-driven action on invasive species remediation and prioritization strategies; and grow and align communication efforts to inform the public about the risks posed by invasive plants, and associated actions that can be taken by the community.

The interdisciplinary team will release a memorandum detailing the expanded County effort in Fall of 2024. This report will highlight needed future actions by the County and individual departments, and these efforts are supported and bolstered by the County's Climate Action Executive Team (CAET), the interdisciplinary working group, representative of over 20 unique County Departments dedicated to strategic alignment to better inform, plan, and adapt to pressing climate priorities for the County and the region.

Meanwhile, individual County departments are showing leadership in the invasive species space. Recent accomplishments and ongoing actions are highlighted in the February 2024 memorandum. As an example, Pima County's Natural Resources, Parks, and Recreation (NRPR) department coordinates volunteer events such as the 'Sonoran Desert Weedwhackers' which hosts almost weekly opportunities to engage the community in 'community pulls' in and around Tucson Mountain Park.

The Pima County Regional Flood Control District, working with the Department of Transportation and contractors, has received two grants from the Department of Forestry and Fire Management which to treat invasive species in drainageways and rights of way in order to reduce fire risk. The grants help leverage the departments' actual invasives species mitigation costs, which are used as match for the grant. This results in a considerable increase in resources available for invasive species management. The resources available remain low compared to the need.

On May 7, the Board of Supervisors will consider approving a grant from the Service to Pima County to expand the growing capacity of the County's Native Plant Nursery. The grant—

⁸ Pima County 2022 Multi-Jurisdictional Hazard Mitigation Plan

and increased nursery capacity—will enable the County to assist in regional post-wildland fire recovery efforts by growing native grasses and other plants for projects on Service properties such as the Buenos Aires National Wildlife Refuge.

Community Partnerships Mitigating Invasive Species

The County collaborates with a number of community agencies on reducing the risk of wildfire in the region. The County initiated a funding distribution for the Southern Arizona Buffelgrass Coordination Center, which is now directed through the Arizona-Sonora Desert Museum for the 'Save our Saguaro – Beat Back Buffelgrass' campaign. The Museum also provides ongoing leadership in the invasive plant species space by leading the Sonoran Desert Cooperative Weed Management Area (SD-CWMA), which consists of a website for disseminating information about key invasive species. Organizing a community of practice via quarterly meeting and working groups is also a key function of the SD-CWMA.

The National Park Service (NPS) also organizes volunteer pulling events at Saguaro National Park – these events are held between October and March, annually, and the public can sign up to engage further and become 'Saguaro Stewards' supporting the 'weed-free trails' initiatives. Since 2022, support through the NPS initiatives, the public can also 'adopt-an-area' to pull invasive grasses.

Preparing for the 2024 Wildfire Season

Wildfire Season is marked by central components to determine risk of wildfire, and associated conditions that would promote a higher risk of wildfire impacts to the natural and conservation environments, and urban region. This risk is heightened by a nexus of hot, dry climate, fuel, and wind. Action to promote wildfire awareness prior to wildfire season is essential – such as how to assure human impact to increase the risk of wildfire is also mitigated.

Pima County's Wildfire Risk

As detailed in the Department of Forestry and Fire Management's recent preparatory fire season information release, the 2024 season marks potential for above average fire activity in certain areas of the state, and into specifically, the Santa Catalina mountains. The region around the Santa Catalina mountains is estimated to have an elevated risk of wildfire due to the high-level of grasses and brush, which are quick to ignite and promote conditions that enable the rapid spread of wildfire.

Wildfire Events

Community risk and rate of growth of the fire can be inextricably linked to climate / weather patterns – such as extreme hot and dry conditions, drought, presence of dry brush and grasses – such as the invasive grasses in the region – and wind. In the event of a wildfire in the region, the response efforts are coordinated first locally and expand based on the complexity of the fire and can include a multitude of partners from jurisdictional, state, and federal fire response agencies.

Fire management teams play a crucial role in emergency situations, working closely with law enforcement and emergency management to ensure public safety. When a fire incident occurs, these teams collaborate to manage the operational, logistical, and safety aspects of the response. Incident Management Teams (IMTs), which include personnel from various agencies, are often mobilized to provide a structured command and control framework. They are responsible for overseeing the response efforts, which may include coordinating with law enforcement to secure the area and facilitate evacuations, as well as with Pima County OEM to ensure efficient resource allocation and communication with the public.

This interagency cooperation is vital for managing complex incidents, ranging from wildfires to other all-risk situations. Effective collaboration and interoperability among these entities are essential for a successful outcome, especially in high-threat situations where roles may overlap but each agency has a distinct and critical role. Standard operating procedures and mutual aid agreements are often established to ensure seamless operations and common understanding among the different agencies involved.

The County departmental teams and community stakeholders continue to communicate about, and work to mitigate the threat and presence of invasive species that contribute exponentially to our wildfire risk levels. The County also is actively preparing for communications efforts on wildfire emergency response, and outreach on how to reduce wildfire risk through behaviors, remediating fire fuel such as dry, invasive grasses, and the ongoing public communication effort on wildfire season, risk, and emergency response in the event of a wildfire with proximity to urban areas.

Air Quality

Pima County's Department of Environmental Quality (PDEQ), and the Arizona Department of Environmental Quality provide comprehensive resources for wildfire smoke forecasting and the impact to Air Quality and health. [Air quality metrics](#) are readily available, and in the event of ample wildfire smoke there is a large-scale effort to communicate [local air quality levels](#) and impacts associated with elevated concentrations of particulates and ozone associated with wildfire smoke. Additionally, 'Air Pollution Action Day Advisories' are issued by PDEQ when particulates or ozone levels are expected to exceed their respective health standards, to which the public can [sign up to receive these action day advisories](#).

Flood Risk

The Pima County Regional Flood Control District (the District) knows that floods follow fires. Even while the Bighorn Fire was still burning, the District began evaluating the affected watersheds to estimate the increased risk of flooding to downstream property and improvements. This evaluation resulted in the implementation of a plan to protect property through the placement of select drainage improvements funded by the District tax levy, a Natural Resource Conservation Service grant, and an Arizona Department of Forestry and Fire Management (DFFM) grant. In addition, the District uses the new flood risk information to

inform property owners of additional flood mitigation action they take to protect themselves and their improvements.

Collective Effort and Awareness and Education and Next Steps

In preparation for each wildfire season, Pima County OEM collaborates with local fire jurisdictions, law enforcement, neighboring county emergency management, Arizona DFFM and the Department of Emergency and Military Affairs (DEMA), the Coronado National Forest, and key stakeholders like the National Weather Services and American Red Cross on fire forecasting and support. DEMA markets their "Ready, Set, Go" campaign, and OEM encourages the community to sign up for emergency notifications through My Alerts (MyAlerts.pima.gov)

Steps that the public can take are reducing opportunities for fire-related activities, especially in high-risk areas (and those with large levels of grasses, brush, and vegetation), creating defensible space around homes and properties, and ongoing prescribed burn projects to reduce the risk of wildfire around communities. Home repair, seasonal cleanup, and removal of fire risks, such as trash and debris can also protect residents and their homes. For public information, there are also available Arizona-specific 'fire-wise' web resources available through DFFM, in alignment with 'Fire-Wise USA' best practices, in addition to [FEMA's Wildfire Exposure Risk Map](#).

We will update the BOS regarding the status of the pending grant application to update the County's Wildfire Comprehensive Planning grant opportunity and subsequent development of the plan.

- c: Carmine DeBonis, Jr., Deputy County Administrator
- Francisco García, MD, MPH, Deputy County Administrator and Chief Medical Officer
- Steve Holmes, Deputy County Administrator
- Shane Clark, Director, Pima County Office of Emergency Management
- Sandra Espinoza, Deputy Director, Pima County Office of Emergency Management
- Nicole Fyffe, Interim Director, Pima County Conservation Lands and Resources
- Victor Periera, Director, Pima County Natural Resources, Parks, and Recreation
- Brian Powell, Division Manager, Pima County Conservation Lands and Resources
- Scott DiBiase, Director, Pima County Department of Environmental Quality
- Eric Shepp, Director, Pima County Flood Control District
- Sarah Davis, Senior Advisor, Pima County Administrator's Office