



**Kara Cross**

Regional Vice President,  
State Government Affairs  
T: 916 802 6228  
Kara.Cross@verisk.com

January 31, 2020  
Senate Committee on Wildfire Reduction and Recovery  
Oregon State Legislature  
900 Court Street, NE  
Salem, Oregon 97301

RE: SB 1536: Relating to wildfires; and declaring an emergency.  
Informational Meeting, February 3, 2020

Dear Committee Members:

We are writing to provide comments on SB 1536 relating to wildfires. Verisk is a leading data analytics provider serving customers around the world in insurance, energy and specialized markets, and financial services. Through our AIR Worldwide and Insurance Services Office, Inc. subsidiaries we are a leading provider of catastrophe models, including wildfire risk maps for the property and casualty insurance industry, including insurers, reinsurers, insurance regulators and risk managers. Scientists and engineers from our Atmospheric and Environmental Research group help governments and businesses solve the world's biggest climate issues. We prepare agencies like NOAA, NASA and the Department of Defense, along with large insurance, investment and energy companies to anticipate, manage and react to weather and climate related risk.

We respectfully offer the following input to contribute to the important conversation on mitigation and resiliency for the state of Oregon.

Section 8, under "Land Use" states that a wildfire risk map be sufficiently detailed to allow for the assessment of wildfire risk at the "property-ownership level." Technology can assess risk at the address level. We recommend clarifying what is meant by "property-ownership" by instead using "address level."

Section 8 lists agencies and resources for developing and maintaining wildfire risk maps. We suggest including "insurance research organizations" to account for research and work that is already available in the marketplace for developing and maintaining maps.

Section 10 requires the Insurance Commissioner to order insurers to provide incentives for mitigation efforts. There is significant work being conducted by various research organizations, firefighting groups and insurers to understand and determine the effectiveness of individual and community mitigation. In fact, Insurance Services Office (ISO) recently formed a partnership with the Western Fire Chiefs Association and Intterra to study the effectiveness of individual property level mitigation. In addition, ISO has partnered with the International Association of Fire Chiefs to help promote their efforts with insurers around community-wide efforts through their Ready, Set,



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Go program. We recommend a mechanism be put in place to support data collection and research efforts to better understand the issues before mandating financial incentives that may not accurately reflect the real or perceived reduction in risk. Encouraging the collection of data, especially at the community level would be particularly useful.

In addressing building codes (Sections 13 and 14) we encourage enabling the Department of Land Conservation and Development to utilize existing tools in the marketplace that assess enforcement of building codes at the jurisdiction level. ISO's Building Code Effectiveness Grading System (BCEGS), introduced over 25 years ago in the wake of Hurricane Andrew, now grades 29,000 enforcement jurisdictions covering 93% of the population in the United States and 206 enforcement jurisdictions covering 88% of the population in Oregon.

On a broader note, we encourage the Legislature to support more data collection and research for mitigation and building codes. The bill's sections devoted to health effects (Sections 15-18) and fire suppression and protection (Section 25), create a task force and require working with a private consultant, respectively. These efforts support more data-driven policy and solutions which we believe are just as critical for supporting effective mitigation and building codes. We recommend enabling the appropriate state agencies with the ability to work with third party consultants, where appropriate, to collect and develop more data to achieve data-driven solutions for Oregon.

We appreciate the opportunity to provide comments. For your information, we have included a copy of the 2019 Oregon Wildfire Risk Report. Please feel free to use Verisk as a resource. Should you have any questions, please contact Kara Cross, Regional Vice President, State Government Affairs at [kara.cross@verisk.com](mailto:kara.cross@verisk.com).

Respectfully,

Kara Cross

Cc: Governor Kate Brown  
Jason Miner, Natural Resources Policy Advisor, Office of Governor Kate Brown