Submitter:	Daniel Ruby
On Behalf Of:	
Committee:	Senate Committee On Rules
Measure, Appointment or Topic:	SB1540

Chair and Members of the Committee,

My name is Dan Ruby. I am a science educator, former museum CEO, and current climate resilience consultant. I have spent my career helping communities understand risk, respond to scientific evidence, and build practical solutions that protect lives and livelihoods. I am writing in strong support of Senate Bill 1540.
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As a science educator, I have taught thousands of students how to evaluate evidence, understand systems, and connect data to decision-making. Wildfire risk is not abstract. It is measurable, modelable, and increasingly present in our communities. Climate change is intensifying wildfire behavior, lengthening fire seasons, and increasing the probability of catastrophic loss. In Southern Oregon, we have experienced this reality firsthand.

SB 1540 addresses a growing disconnect between scientific risk modeling and homeowner agency. Insurers are increasingly relying on catastrophe models and wildfire risk scoring tools to determine underwriting, pricing, non-renewals, and adverse ratings. These tools are powerful and appropriate in principle. However, when models are opaque and when they fail to incorporate mitigation actions undertaken by homeowners or communities, they undermine both fairness and resilience.

First, it creates regulatory transparency. It requires insurers using catastrophe or wildfire risk models to submit those models and explain how they are used in underwriting decisions. The bill ensures that the models account for community-level mitigation and property-specific mitigation actions. This is not an attack on proprietary tools; the bill explicitly protects trade secrets. It is a commonsense requirement that if a model is being used to determine access to essential insurance coverage, it must reflect the real-world actions that reduce risk.

Second, it aligns financial incentives with scientifically validated mitigation. The bill requires insurers to incorporate community-level mitigation actions—such as fuel reduction, fire-adapted community certifications, and state-certified wildfire risk reduction efforts—and property-specific mitigation actions like defensible space and home hardening. If those actions are not incorporated directly into modeling, insurers must provide actuarially supported premium discounts or incentives. This is essential climate adaptation policy. When homeowners invest in defensible space or fire-resistant materials, and when communities invest in fuel treatments or earn

recognized certifications, those actions demonstrably reduce loss probability and severity. If insurers do not reflect those reductions in rates, we create a perverse outcome: people do the right thing and receive no recognition for it.

Third, the bill strengthens consumer communication and appeal rights. Insurers must clearly notify homeowners of their wildfire risk classification or score, explain the primary factors influencing it, and identify specific mitigation actions that could improve the score. Homeowners are given the right to appeal or dispute classifications and discount amounts.

Risk models should not function as black boxes that simply produce higher premiums or non-renewals. They should operate as feedback mechanisms that inform safer behavior. This bill converts wildfire modeling from a one-way pricing tool into a two-way resilience tool. Insurance is foundational to mortgages, rebuilding, and economic stability. When wildfire risk increases due to climate change, we must adapt policy frameworkswe must adapt policy frameworks accordingly. This bill does not attempt to override actuarial science. It strengthens it by ensuring models incorporate the full set of relevant risk-reducing variables and by requiring clear communication of how those variables matter.

For these reasons, I respectfully urge your support of this bill. Thank you for your consideration.