WILDFIRE LEGISLATIVE SCIENCE SERVICES BRIEFING MEMO

HOME HARDENING STANDARDS & ANALYSIS OF CURRENT LEGISLATIVE PROPOSALS

Overview

This memo compares IBHS wildfire home hardening standards ("essential" and "enhanced")—representing industry best practices—against existing codes and statutes. It then evaluates current state legislative proposals to assess the extent to which they close the gap between statute and best practices, as well as their feasibility for implementation.

To efficiently understand the insurance and home hardening landscape, experts also advise starting with the SB 254 report, noting that its focus on actionable options rather than rigid recommendations provides the preferred baseline knowledge required for policymaking.

Socioeconomic and Technical Feasibility

- Standalone economics: According to Headwaters Economics, depending on location, home hardening adds only a marginal cost difference to new construction–$9,000 for IBHS Essential standards, $13,000 for CA Ch. 7A compliance, and $15,000 for IBHS Enhanced standards–representing a 2–3% construction cost increase. Additionally, retrofitting legacy homes can cost upwards of $10,000 to $40,000.[1]
- "Pay-for-Success" gap: Under current law, homeowners absorb most wildfire mitigation costs out-of-pocket without any statutory guarantee of insurance policy renewal or standardized premium discounts. The California Department of Insurance's Safer from Wildfires regulation (2022) did not specify discount amounts for mitigation measures; however, the Department's Sustainable Insurance Strategy (2024) does require insurers to include property, community, and landscape scale wildfire mitigation measures into catastrophe modeling for the "catastrophe load" of the rate.[2]
- Awareness and Evaluation: Public knowledge is strong regarding traditional "defensible space" (i.e., clearing vegetation around the home), but weak concerning "home hardening" (e.g., gutters, eave vents, building materials). Many communities also lack access to qualified inspectors and contractors.

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Summary Gap Analysis between Codes, Statutes, and IBHS Standards (full analysis here):

- Where IBHS Essential standard is stricter: Enforces zero-tolerance policies within the immediate 5-ft home perimeter (e.g., complete mulch removal, banning privacy rows/planter boxes, retroactive removal of the first 5-ft of combustible fencing), strict lawn maintenance (< 4-in), and vertical tree limbing.
- Where California code is stricter: Imposes horizontal shrub separation (15-ft vs. IBHS's height-proportional rules) and mandates strict native/drought-tolerant plant compositions (PRC § 4291).
- Omissions: The IBHS Essential standard omits structural components like multi-pane windows, doors, protected eaves, and decks—all of which are strictly regulated by Ch. 7A.
- The "Enhanced" standard: The IBHS Enhanced standard introduces these previously omitted structural elements, making it preferred for new builds, but cost-prohibitive for older home retrofits.

[1] Note that studies on the retrofitted homes were done using figures from national data, which skews cheaper compared to costs in California. Also, retrofitting costs were calculated for Altadena, CA homes, with the caveat that homes in different locations are built to different standards and might vary in cost.

[2] According to subject matter experts we consulted for this memo, this has had little if any impact on rates because the catastrophe load is determined for all of the insurers' policies across the state, not only those where mitigations have been implemented.

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Relevant Codes & Statute in California (full inventory here and Cal OES crosswalk here):

Code/Statute	Summary
CA Building Code Part 7 (Formerly Ch. 7A)	Material requirements and construction methods for exterior wildfire exposure risk reduction.
CA Fire Code Ch. 49	Requirements to mitigate conditions that might cause a structure-origin ignition in the Wildland-Urban Interface (WUI).
CA Public Resources Code (PRC) § 4291	100-ft defensible space requirements for residents living in State Responsibility Areas (SRAs).
CA WUI Code Ch. 5 & Ch. 6	Provide special building construction (Ch. 5) and fire protection requirements (Ch. 6) for WUI structures.
CA Gov't Code § 51182	Identical to PRC § 4291, establishes identical 100-ft defensible space mandates for Local Responsibility Areas (LRAs) designated as Very High Fire Hazard Severity Zones (VHFHSZs).
AB 1455 (passed Oct. 2025)	Amends PRC § 4291 to accelerate 5-ft ember-resistant perimeter mandates ("Zone Zero"). Compliance for existing homes taking effect on Jan. 1, 2027 or Jan. 1, 2028, depending on the property's designated Fire Hazard Severity Zone (FHSZ).
CA Code of Regs. § 2644.9. (Safer from Wildfire)	Mandates that insurance companies in California explicitly recognize and reward property owners with a small discount for verified wildfire mitigation efforts at the property and community level.

Current Legislative Proposals (2025 - 2026 Session)

- AB 1960 (Bennett): Updates the state's existing grant process to create a financial incentive for community-level wildfire mitigation efforts, starting in 2028/29.
- SB 894 (Allen): Creates the Wildfire Resilience Loan Program, designed to help property owners afford the upfront costs of home hardening with low interest loan options.
- SB 1084 (Alvarado-Gil): Establishes two state income tax credits that cover 50% of out-of-pocket costs for wildfire mitigation, up to specific caps.

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Policy Considerations

Current statute and legislation primarily rewards higher-income, proactive property owners. To build systemic wildfire resilience, California can consider financing for upfront, point-of-sale grant vouchers for low-income communities and introduce statutory insurance reciprocity mandates that guarantee policy renewals and fair pricing for certified structures. It is worth noting that actions prescribed by the different codes and standards increase the survivability of a home in a wildfire. However, completing them does not guarantee insurance affordability or availability in the admitted market.

Additionally, many insurers do not voluntarily take mitigation into account when they decide whether to renew or write insurance and in pricing. Insurance experts in California have therefore identified legislative opportunities such as those similar to Colorado's HB 1182 or the former CA SB 1060 (see below) that would require insurers to do so.

Policy Dynamics Surrounding Wildfire Mitigation and Insurance Pricing

In 2024, the California Insurance Commissioner denied a request from The Nature Conservancy and the Rural Counties to require, through administrative action, that insurers account for property, community, and landscape-scale mitigation in modeling for rate relativities.

Large insurers in California also advocated against CA SB 1060 (Becker) in 2024. This bill would have required models used by insurers for underwriting (renewing and writing) and pricing to take property, community, and landscape scale mitigation into account.

Meanwhile, in 2025, Colorado enacted CO HB 1182, modeled after California's SB 1060. The law requires models used by insurers for underwriting and pricing to take into account property, community, and landscape scale mitigation. Colorado was the first state to enact such a requirement, making HB 1182 the most consequential property insurance bill enacted in 2025 nationwide.





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