DRAFT: Executive Summary

California's FAIR Plan Financial Stability: Assessing Systemic Risk Following the 2025 Palisades and Eaton Fires

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January 2026

Executive Summary

This analysis examines the financial stability of California's Fair Access to Insurance Requirements (FAIR) Plan following the January 2025 Palisades and Eaton fires. Using California Department of Insurance market data (2022-2023) and official CAL FIRE post-fire damage assessments, I find that these fires destroyed 11,432 single-family homes with a combined residential property value of $10.1 billion. The FAIR Plan insured 15-25% of these high-risk properties. Potential losses exceeded reserves and reinsurance coverage and triggered assessments on the voluntary insurance market.

Key Findings:

- Combined Palisades/Eaton residential damage: $10.1 billion (11,432 homes destroyed)
- California homeowners insurance market: 92 companies; top 10 control 63.5% of market share
- Estimated FAIR Plan exposure: $4 billion in losses
- Assessment on voluntary market: $1 billion (after reserves/reinsurance)
- Insurers received assessments ~50% of annual written premium in 2023
- State backstop liability if companies cannot pay future assessments.

Policy Implications: The FAIR Plan's assessment mechanism, designed for modest losses, is inadequate for catastrophic wildfire events. California faces urgent need for: (1) emergency FAIR Plan capitalization, (2) fundamental insurance market reform, (3) fiscal contingency planning for potential state backstop obligations, and (4) long-term climate adaptation strategies including managed retreat from highest-risk areas

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1. Introduction: California's Insurance Crisis

California's property insurance market is in crisis. Over the past three years, major insurers including State Farm, Allstate, and Farmers have restricted new policies or withdrawn entirely from high-risk wildfire areas. The California FAIR Plan, created in 1968 as an insurer of last resort, has seen enrollment surge from approximately 200,000 policies in 2020 to over 600,000 by late 2025. This growth concentrates wildfire risk in an entity that was never designed—nor adequately capitalized—to serve as a primary insurance market.

The January 2025 Palisades and Eaton fires provide a critical stress test of this system. Official CAL FIRE damage assessments, released in late January 2025, document the destruction of 11,432 single-family homes with combined assessed property values exceeding $10 billion. For context, the 2018 Camp Fire destroyed approximately 18,000 structures total across all categories with estimated insured losses of $12 billion. The Palisades and Eaton fires, occurring simultaneously in high-value Los Angeles County communities, represent comparable scale concentrated in a matter of days.

Research Questions:

This analysis addresses three critical questions:

1. What is the scale of insured losses from the Palisades and Eaton fires?
2. What is the FAIR Plan's potential exposure, and does it have adequate capital?
3. Examine potential policies to alleviate the strained market

These questions have immediate policy relevance. The Insurance Commissioner must approve emergency rate adjustments, the Legislature must consider fiscal appropriations, and local governments must plan for potential housing market disruption if insurance becomes unavailable or unaffordable.

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2. Background: The FAIR Plan Assessment Mechanism

2.1 How the FAIR Plan Works

California's FAIR Plan operates as a single-peril (Wildfire) emergency & temporary residual insurance backstop for homeowners. All property insurers licensed in California must participate as members. When a property owner cannot obtain coverage in the voluntary market, they may apply to the FAIR Plan. Member companies write policies on the FAIR Plan's behalf and service claims, but financial responsibility rests with the FAIR Plan.

The FAIR (Fair Access to Insurance Requirements) Plan was created in 1968 by the California state legislature in response to a growing number of homeowners being unable to attain comprehensive homeownership following the Watts events and growing wildfire risk. It is not a state, nor a public entity. It is therefore not required to report to the California Department of Insurance as other companies under prop103. There exists legislation, however, that regulates what FAIR plan's activities. After 1993 Malibu & Alta Dena Fires, followed by the Northridge earthquake led to a $250M assessment on members of the FAIR plan, the legislature passed a law requiring the FAIR plan generate enough revenue through premiums and reinsurance coverage to mitigate the risk to Californians indirectly bearing the cost of catastrophic events. In testimony before the California Department of Insurance in December 2024 the FAIR plan president revealed a critical vulnerability: **the FAIR Plan is not actuarially balanced**. Premium rates are set below risk-adjusted levels to maintain affordability, meaning premium income alone cannot cover expected long-term losses. This increases the chance of an assessment on the FAIR plan membership following major events, or a series of smaller events back to back.

2.2 The Assessment Trigger

When losses exceed available capital (premiums collected, reserves, and reinsurance coverage) the FAIR Plan may assess its member companies. Assessment amounts are distributed proportionally to each company's market share in California homeowners insurance. Companies must remit payments within 30 days or face regulatory penalties.

This mechanism worked acceptably when the FAIR Plan covered a small, stable portion of the market and catastrophic losses were infrequent. However, with rapid FAIR plan growth in both high-risk and low- to moderate-risk areas and insurance companies exiting the voluntary market, there is an increased likelihood of an assessment on FAIR plan members being triggered.

2.3 Geographic Risk Concentration

The December 2024 testimony identified Lake Arrowhead in the San Bernardino Mountains as the FAIR Plan's highest-risk concentration, a heavily forested area with numerous FAIR-insured properties. The Palisades and Eaton fires, however, occurred in areas not previously identified as peak FAIR Plan concentration zones. This suggests the FAIR Plan's exposure may be broader and less predictable than previously understood, with significant presence throughout Los Angeles County's wildland-urban interface.

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3. Data and Methodology

3.1 Data Sources

This analysis integrates three primary datasets:

Table 1: Data Sources

Data Type	Source	Period	Records/Coverage
Insurance market data	CA Department of Insurance	2022-2023	92 insurance groups, homeowners (Line 1 only)
Mosquito Fire damage	CAL FIRE post-fire assessment	September 2022	667 structures assessed
Palisades Fire damage	CAL FIRE post-fire assessment	January 2025	12,070 structures assessed
Eaton Fire damage	CAL FIRE post-fire assessment	January 2025	18,422 structures assessed

Insurance Market Data: California Department of Insurance requires all property insurers to file annual financial statements. I extracted data for "Line 1" (homeowners insurance) covering calendar years 2022 and 2023. Key variables include:

- **Direct Written Premium**: Total premium dollars collected from policyholders
- **Direct Earned Premium**: Portion of written premium recognized as revenue (after accounting for policy timing)
- **Group Code and Name**: Identifies parent company/insurance group

I calculated each company's market share by dividing its 2023 direct written premium by the total market. The 2023 direct written premium was used as a FAIR plan update to the assembly indicating that was the only year used for calculating market share.

Fire Damage Data: CAL FIRE conducts post-fire damage inspections, assessing each structure and recording damage level, structure type, and geographic coordinates. County assessor data provide estimated property values (assessed improved value). Damage categories include:

- Destroyed (>50% damage)
- Major Damage (26-50%)
- Minor Damage (10-25%)
- Affected (1-9%)
- No Damage

For this analysis, I focus on "Destroyed" structures, as these represent total losses requiring full insurance payouts. Property values represent pre-fire assessed values, which may

underestimate actual replacement costs, particularly in high-appreciation markets like Pacific Palisades.

3.2 Analytical Framework

Step 1: Calculate Total Insured Losses

For each fire, I sum assessed property values for destroyed single-family residences. This provides a baseline estimate of residential property damage.

Step 2: Assess Financial Impact as Presented by FAIR plan in May 2025

Step 3: Distribute Assessment by Market Share

Each insurer's assessment obligation equals the total assessment multiplied by their market share:

Company Assessment = Total Assessment × Company Market Share

Step 4: Analyze Risk Distribution by geography and stakeholders

3.3 Limitations

This analysis has several important limitations:

1. **Property Value Estimates**: County assessed values may not reflect full replacement cost, particularly in rapidly appreciating markets
2. **FAIR Plan Penetration**: Actual market share is unknown; I model plausible ranges
3. **Simplified Assessment Model**: Does not account for company-specific factors (surplus, reinsurance, credit for current high-risk policy writing, etc.)
4. **Incomplete Financial Data**: Lack of access to companies' full balance sheets limits precision
5. **Static Analysis**: Does not model behavioral responses (e.g., companies exiting market preemptively)
6. **Other Structure Types**: Focuses on single-family homes; commercial and multi-unit losses add additional exposure

Despite these limitations, the analysis provides order-of-magnitude estimates sufficient for policy planning purposes.

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4. Findings

4.1 Fire Damage Scale

The Palisades and Eaton fires destroyed residential property at unprecedented scale:

Residential Property Damage by Fire

Fire	Single-Family Homes Assessed	Homes Destroyed	Destruction Rate	Total Assessed Value (Destroyed)
Mosquito (2022)	366	44	12.0%	$53.6 million
Palisades (2025)	9,449	5,421	57.4%	$7,192.3 million
Eaton (2025)	11,883	6,011	50.6%	$2,878.5 million
Combined 2025	**21,332**	**11,432**	**53.6%**	**$10,070.8 million**

For context:

- The Mosquito Fire (2022) destroyed 44 single-family homes valued at $54 million
- **Palisades alone destroyed 133× more residential value than Mosquito**
- Combined 2025 fires destroyed **187× more residential value than Mosquito**

The destruction rate—over 50% of assessed structures destroyed—indicates extreme fire behavior. This reflects the fires' rapid spread through dense residential areas under severe wind conditions (Santa Ana winds exceeding 60 mph in some locations).

Property value distribution reveals the fires' economic impact:

- **Pacific Palisades** (high-value coastal community): Average destroyed home value = $1.3 million
- **Altadena/Pasadena area** (Eaton Fire): Average destroyed home value = $479,000
- **Combined average**: $881,000 per destroyed home

These figures likely understate true replacement costs, as assessed values typically lag market values, and rebuilding costs have increased substantially due to updated building codes and construction cost inflation.

At the update made in May of 2025 to the California State Assembly Insurance Committee they reported an estimated $2.9B in claims as of that update. They reported that the FAIR plan was expecting a total of $4.0B in claims. The table below shows estimated cash flow for CA FAIR plan from January through June 2025.

Based on a $4 billion ultimate loss, the FAIR Plan cash position projected over the next 6 months is:

	Without Assessment	With Assessment
Cash position at 1/1/2025	$1,507,000,000	$1,507,000,000
Activity for next 3 months:		
Profit less operating expenses less reinsurance costs	$125,000,000	$125,000,000
Anticipated loss and expense payments**	($3,000,000,000)	($3,000,000,000)
Reinsurance recoveries, net of reinstatements	$1,194,000,000	$1,194,000,000
Assessment	$0	$1,000,000,000
Projected Cash position at 3/31/2025	($174,000,000)	$826,000,000
Profit less operating expenses less reinsurance costs	$24,450,000	$24,450,000
Anticipated loss and expense payments**	($800,000,000)	($800,000,000)
Reinsurance recoveries, net of reinstatements	$255,118,000	$255,118,000
Projected Cash position at 6/30/2025	($694,432,000)	$305,568,000

Based on May 28, 2025 California FAIR Plan Update Presentation to California Assembly Standing Committee on Insurance.

4.2 Insurance Market Structure Risk Concentration

California's homeowners insurance market shows significant concentration:

Top 10 Insurance Groups by Market Share of 2023 Written Premiums

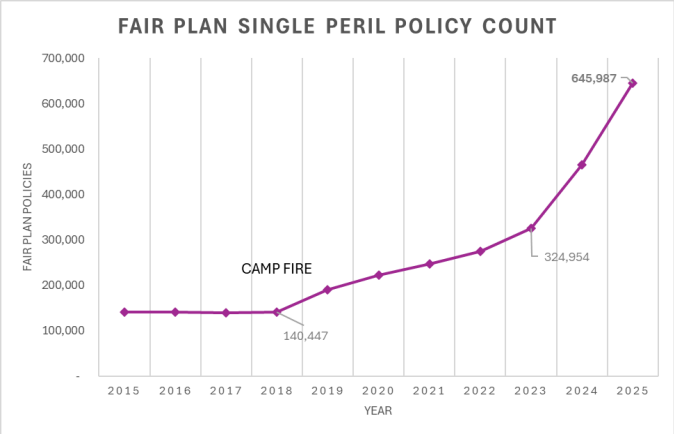
Rank	Insurance Group	Market Share	2023 Written Premium	Approx. Assessment Share
1	FARMERS INS GRP	11.8%	227.3M	118.3M
2	LIBERTY MUT GRP	9.8%	188.7M	98.2M
3	Travelers Grp	8.2%	156.9M	81.7M
4	STATE FARM GRP	6.6%	127M	66.1M
5	CSAA Ins Grp	5.7%	110.1M	57.3M
6	FM GLOBAL GRP	5.7%	109.1M	56.8M
7	ZURICH INS GRP	4.3%	82.4M	42.9M
8	ALLIANZ INS GRP	4.2%	80.9M	42.1M
9	Natl Ins Holdings Grp	3.4%	65.1M	33.9M
10	MERCURY GEN GRP	3.3%	62.8M	32.7M
	Top 10 Total	**63.0%**	**$1,210.4M**	
	All Others Total	**37.0%**	**$710.4M**	

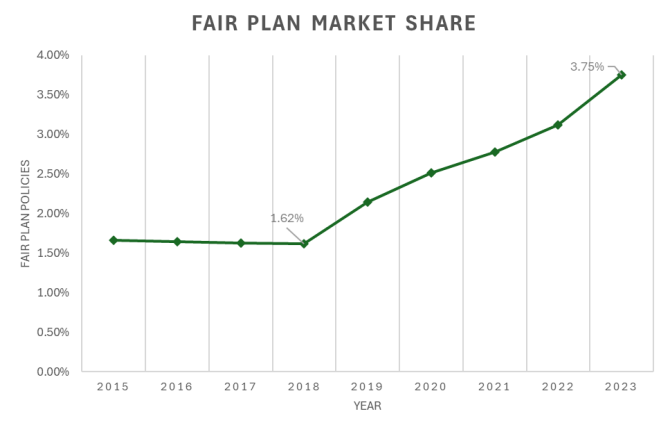
The top 10 companies in the voluntary market represent almost two-thirds of the market share for fire insurance (line 1 only). Farmer's is almost 12% of the overall market for fire premiums written in 2023. For all insurance groups, given the proportional nature of the division of burden, they will all be assessed roughly 52% of their 2023 fire written premiums. Given how the calculation has been described, it appears as though the assessments are regressive and have a potentially greater impact on smaller carriers.

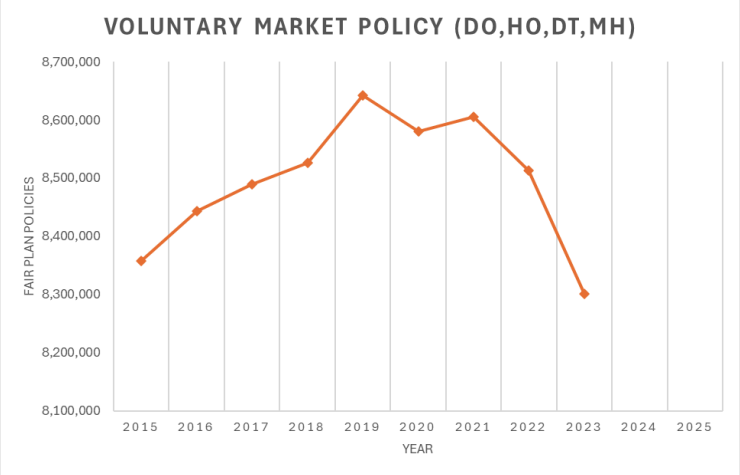
4.2 FAIR Plan Market Share Growth

From the below graphs we can see that the California FAIR plan share of the single-peril line 1 fire insurance market share has grown from 2015-2023. We have the policy counts from 2024 and 2025 where we see the FAIR plan continues to grow in policy writing.

California Residential Property Insurance Market 2015-2025
FAIR Plan vs. Voluntary Admitted Market







4.3 California Distressed County Distribution

From the above the FAIR plan dynamics, it is difficult for that mechanism to be the sole vector for stabilizing the insurance market in California. In addition to the FAIR plan, the California Department of Insurance is also leading efforts to stabilize the California market(s) (insurance and thereby real estate related economy in general). As such they are trying to retain the voluntary insurance market in California and encourage homeowners that insurance will be available for their homes. A portion of the Sustainable Insurance Strategy includes defining requirements around insurance companies operating in California to include a certain percentage of their new policies to be written in “distressed” areas. As of December 2024 the

California code was updated from a distressed county being defined by having high/very-high risk dwellings in excess of an absolute percentage, to a distressed county being defined by a county having high/very-high risk dwellings in excess of the 50th percentile. As of the latest data published from California Department of Finance January 2015 for dwelling counts on the CDI website for data and analysis of wildfires, we found that the 50th percentile was defined almost exactly at the 20% absolute value. We find that the distribution of risk at that time was in absolute terms weighted to non-distressed counties as shown in the table below.

Summary of Distressed Counties

Metric	Distressed (≥50th %ile)	Non-Distressed (<50th %ile)	Statewide Total
Number of Counties	29	29	58
Total Dwelling Units	1,501,571	9,221,887	10,723,458
High/Very High Risk Units	509,231	787,485	1,296,716
Percent of State High-Risk Units	39.30%	60.70%	100.00%

We see that Distressed counties had 500k High/VeryHigh risk dwelling units, non-distressed counties had 787k High/VeryHigh risk dwelling units out of a total statewide of 1.3M high/VeryHigh risk dwelling units

Distressed Counties by Region

Region	Counties	Distressed Counties	% Distressed	Total Dwelling Units	High/Very High Risk Units	Avg % at High Risk
Northern CA	48	27	56.20%	4,643,274	619,521	13.30%
Southern CA	10	2	20.00%	6,080,184	677,195	11.10%
Total Statewide	**58**	**29**		**10,723,458**	**1,296,716**	

At that time distressed counties were defined to be disproportionately in the relatively rural northern regions of California. This resulted in 5 highly populated southern California counties containing in excess of 40% of the state's total high/very-high risk dwelling units, while still being classified as non-distressed counties.
Since that time there have been several major fires in the state. While it would be difficult to project how those fires would have impacted the extremely complex fire hazard mapping

algorithms, it is fair to say that after the states most costly wildfire event in history, Eaton and Palisades fire, southern California would have picked up some weighting in risk.

The latest Fire Hazard Severity Zone Map has been published in 2025 including local area data.

5 Urban Counties

County	Total Dwelling Units	High/Very High Risk Units	% at High/Very High Risk	Statewide Rank	Distressed Status
Los Angeles	2,295,246	232,886	10.10%	37	No
San Diego	849,189	137,786	16.20%	33	No
San Bernardino	618,761	84,096	13.60%	35	No
Riverside	728,856	60,079	8.20%	40	No
Orange	796,844	45,389	5.70%	46	No
Total Dwellings in 5 Counties	**5,288,896**	**560,236**			
Total State-wide Dwellings	**10,723,458**	**1,296,716**			
Percent in 5 Counties	**49.32%**	**43.20%**			

4.5 State & Insurers Fiscal Exposure

If private insurers cannot meet assessment obligations—due to insolvency, regulatory prohibition, or strategic exit from California—the state faces three unpalatable options:

FAIR Plan Insolvency Response Options: Comparative Analysis

Option	Advantages	Disadvantage
Allow FAIR Plan Insolvency	• Avoids direct state fiscal liability • Maintains no-backstop policy precedent • No taxpayer burden	• Massive individual financial distress (homeowners unable to rebuild) • Mortgage defaults (lenders require insurance) • Housing market collapse • Political catastrophe for elected officials • State liability as regulator

Option	Advantages	Disadvantage
		• Insurance Industry in new climate era undermined
Reduce Coverage	• Spreads pain across all policyholders • Preserves some financial stability for FAIR Plan • Maintains partial claim payments • Avoids complete market collapse	• Further homeowner undercompensation for loss • Displaced population • Economic contraction • Legal challenges from policyholders • Still requires some state intervention
State Backstop (including access to Bond funds & Line of Credit proposals)	• Policyholders made whole (rebuilding possible) • Housing market stability maintained • Protects insurance industry credibility • Protects state's financial credibility • Prevents mortgage market disruption • Federal disaster relief may cover portion	• Direct state (tax payer) fiscal liability • Sets precedent for future bailouts • Dis-incentivizes innovation to prevent loss • Crowds out other state budget priorities • Political opposition to "insurer bailout" • May require legislative approval
Continue to Assess Voluntary Market *(The Downward Spiral)*	• Maintains current statutory framework • No direct state appropriation needed • Spreads cost across insurance industry • Politically stable position of today	• Increased risk of voluntary market exodus • Higher premiums for all policyholders • Accelerates market contraction spiral • May trigger additional insurer withdrawals • Pushes more homeowners to FAIR Plan • Worsens long-term structural problem • Assessment capacity likely insufficient for major event

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Political Economy Considerations:

State policymakers face a classic moral hazard dilemma. Backstopping the FAIR Plan protects homeowners but produces longer term implications and we must question whether this would reinforce desired outcomes. It may in fact reinforce non-desired outcomes such as insurers expecting future bailouts, home-owners deferring fire protection efforts. Pushing the expense into the state budget abstracts the cost from the electorate's mind and diffuses the political will to advocate for longer term society wide collaboration on innovation and technological advancements in fire prevention and loss reduction.

Conversely, allowing FAIR Plan insolvency imposes catastrophic costs on homeowners who acted responsibly by purchasing insurance. The political pressure to intervene would be enormous, particularly given media coverage of displaced families unable to rebuild.

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5. Discussion and Policy Implications

5.1 The FAIR Plan Was Not Designed for This

California's FAIR Plan was created in 1968 following the Watts riots, when urban property became uninsurable due to civil unrest risk. The mechanism was designed for temporary limited single peril coverage in a modest portion of the overall market.

Current conditions violate all three assumptions as we are now faced with statewide growing wildfire risk that pressures insurance providers out of high-risk areas in the long term.

The assessment mechanism becomes systemically destabilizing when the FAIR Plan absorbs a large share of catastrophic risk, which contradicts part of its initial mission to stabilize the market.

5.2 The Death Spiral Scenario

If the voluntary market continues to face assessments either from large single events or multiple smaller back to back events this threatens California's insurance market:

1. **Voluntary market exits** high-risk areas → FAIR Plan enrollment grows
2. **FAIR Plan suffers large or multiple loss** → assesses voluntary market
3. **Assessments reduce profitability** → more companies exit California
4. **Fewer companies share next assessment** → per-company burden increases
5. **Return to step 3** (death spiral)

Breaking this cycle requires intervention at multiple points. Rate increases alone will not suffice. If FAIR Plan rates rise to actuarially sound levels, coverage becomes unaffordable, defeating the "fair access" mandate.

5.3 Climate Change Context

This crisis is not a one-time event. Climate projections indicate higher temperatures, increased drought, longer fire seasons and more extreme weather events.

The insurance industry prices risk based on historical loss experience. When historical data no longer predicts future risk, pricing becomes unreliable. Many insurers have concluded California wildfire exposure is fundamentally uninsurable at any price consumers will pay.

This creates a policy challenge: how does California maintain insurability for millions of homeowners in a fundamentally changed climate?

5.4 Policy Recommendations

Based on this analysis, I recommend California pursue a multi-pronged strategy:

Continue efforts to stabilize the insurance Industry through policies being considered or recently put into place. Allow premium increases calculated using future looking models for insurers writing in high risk areas. Give FAIR Plan access to funds through state loans, bonds to be paid back (high risk for tax payor liability given FAIR plan is not actuarially sound). Policymakers should heed the feedback from the lessons learned by the impacted homeowners of Palisades and Eaton fire. Counties should be required to immediately put property tax payments for homes within the fire boundary into forbearance until post-fire damage assessments are completed and adjusted to reflect any property damage. There should be reasonable timelines for mortgage companies to distribute payoff funds received from insurance companies to homeowners.

In the short-term we must continue to shift risk and debate which stakeholders take on the losses. There is no magical math. The actuarial algorithms in the face of increasing risk to a single peril (wildfire) and the increasing costs of housing is not deceiving policymakers and insurance companies. It's real, and there are losses that will be had unless we address the long-term underlying risk. To alleviate the real tension would be to address the risk and achieve an actuarially balanced environment in the California housing insurance market.

In the longer term we need to address the risks. A recent paper “Accelerating Technological Innovation Across the U.S. Wildfire Management System” published by a team of RAND researchers out of the Homeland Security Research Division offered policy propositions that address the underlying problem of lowering risk. Their paper provided a holistic approach bringing together a multifaceted approach. Their recommendations of federally backed funding along with concerted coordination of innovation and broad investment avenues provided real and tangible advice to address challenges beyond the political gymnastics of squeezing a balloon.

In any solution that is found a key consideration is to stay committed in the long run. Walking into a community that has seen the city's leveled and cherished memories vanish up in smoke and declaring the time for fire-hardening and long-term risk reduction may serve to pour salt on the wounds. Asking insurance companies to negotiate on policy writing in high-risk areas immediately following a multi-million dollar assessment that represents almost half a year's underwriting likewise may not be productive.

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6. Limitations and Future Research

This analysis provides order-of-magnitude estimates to inform urgent policy decisions. Several limitations deserve emphasis:

Data Limitations:

1. **Assessed vs. Replacement Value**: County assessed values typically understate true replacement cost. Destroyed homes likely require 20-40% more capital to rebuild than assessed values suggest.

2. **FAIR Plan Data Availability**: The FAIR plan has in recent years increased transparency and continues to do so.

3. **Reinsurance Coverage Uncertain**: FAIR Plan's exact reinsurance program is not fully disclosed. The $1.5B estimate is based on public statements and may be outdated or incomplete. Not only does the FAIR plan have reinsurance, but the admitted insurers are purchasing single peril wildfire insurance for their California policies. This layer's risk.

Future Research Priorities:

1. **Update with new Fire Hazard Severity Maps**: The new maps have been published. We can update the analysis of geographic risk by the distressed counties definition.

2. **Compare to Alternative Insurance Models**: Detailed analysis of how other states structure catastrophe insurance. Look at the nationwide dispersion of risk.

3. **Climate Risk Projection**: Partner with climate scientists to model future wildfire risk under different emissions scenarios.

4. **Affordability Analysis**: Assess how many California homeowners can afford actuarially sound premiums; size the subsidy program required to maintain access

Despite these limitations, the core finding holds: **the Palisades and Eaton fires have exposed fundamental instability in California's property insurance system, requiring immediate policy intervention to prevent market destabilization.**

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7. Conclusion

The January 2025 Palisades and Eaton fires destroyed over 11,000 homes with a combined residential property value exceeding $10 billion. If the FAIR Plan insured 15-25% of these properties, a not unrealistic range given documented voluntary market retreat, it faces another $2-4 billion in losses, overwhelming reserves and reinsurance. The resulting assessment on California's remaining homeowners insurers could reach $1-2 billion again, with individual companies facing obligations equal to 35-64% of annual revenue.

This is not merely an insurance industry problem. It is a systemic threat to California's housing market, fiscal stability, and climate resilience. The FAIR Plan's assessment mechanism, adequate for the modest risks of 1968, proves inadequate for the catastrophic wildfire losses of 2025 and beyond.

California faces difficult choices. Without intervention, the insurance market enters a death spiral: assessments drive more insurers to exit, concentrating risk in the FAIR Plan, leading to larger future assessments. This cycle ends in FAIR Plan insolvency, leaving hundreds of thousands of homeowners unable to rebuild.

The policy recommendations outlined in this paper; FAIR plan access to capitalization, actuarial reform, local government property tax reform, reimbursement reform, long term risk reduction, provide a roadmap to stability. Implementation will be costly and politically difficult, but inaction guarantees catastrophic costs when the next major fire occurs.

The fires that destroyed Pacific Palisades and Altadena are not anomalies. They are the new normal under climate change. California's insurance system must be fundamentally restructured to reflect this reality. The question is not whether to act, but whether policymakers will act with sufficient speed and scale to prevent the impending crisis.

This analysis demonstrates that the necessary data and analytical tools exist to quantify the problem and evaluate solutions. What remains is political will.

References

California Department of Insurance. (2023-2024). *Annual Financial Statements, Property and Casualty Insurers*. Retrieved from https://www.insurance.ca.gov/

California Department of Insurance. (2022). *Percentage of residential structures by ZIP code insured by the FAIR Plan*. Retrieved from https://www.insurance.ca.gov/

California Department of Insurance. (2015). *Estimated number of dwelling units in each county with high to very high wildfire risk exposure*. Retrieved from https://www.insurance.ca.gov/

California Department of Insurance. (2022,2023). *Insurers Detail Premium and Loss Information.* Retrieved from https://www.insurance.ca.gov/

California Department of Forestry and Fire Protection (CAL FIRE). (2022). *Mosquito Fire Post-Fire Damage Inspection Report*. Retrieved from https://www.fire.ca.gov/

California Department of Forestry and Fire Protection (CAL FIRE). (2025). *Palisades Fire Post-Fire Damage Inspection Report*. Retrieved from https://www.fire.ca.gov/

California Department of Forestry and Fire Protection (CAL FIRE). (2025). *Eaton Fire Post-Fire Damage Inspection Report*. Retrieved from https://www.fire.ca.gov/

California FAIR Plan Association. (2024). *Testimony before the California Department of Insurance* [March 2024 hearing transcript].

California FAIR Plan Association. (2025). *Testimony before the California Department of Insurance* [May 2025 hearing transcript].

ROBERTS, PATRICK S., et al. "Accelerating Technological Innovation Across the US Wildfire Management System." (2026). Retrieved from https://www.rand.org/pubs/research_reports/RRA3539-1.html

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END OF EXECUTIVE SUMMARY
