

Submitter: Ralph Bloemers  
On Behalf Of:  
Committee: House Committee On Commerce and Consumer Protection  
Measure, Appointment or Topic: HB3089

Dear Rep Levy and members of the committee,

I have worked on wildfire issues for nearly 25 years. I appreciate the legislatures efforts to align insurance with mitigations that matter for preventing home ignitions.

I write as I am concerned that the change in this legislation may allow for insurers to not notify policyholders. While fire needs combustible material to create flames from an ignition or spark, the dominant forces in extreme fire are often wind and drought. In fact most home loss occurs during wind events with fire in them - around 88 percent (Balch et al 2024). Oregon experiences East wind events every fall, and the wind was the dominant force in carrying fire over long distances.

Furthermore, in urban conflagration, our stuff - such as lawn furniture, outdoor couch cushions, trash and recycle bins - and our homes become the fuel to burn homes.

Your bill defines “wildfire” as follows.

“An uncontrollable brush fire, firestorm or other series of fires, regardless of origin, that is fueled predominantly by trees, grasslands, timber, scrub or any other naturally occurring or native-grown vegetation; and”

I recommend you remove the word “predominantly” and that you consider adding other combustible materials to your list of what may allow the fire to grow and spread.

I furthermore ask that the law include a provision requiring the notification to be provided at least 6 months if not one year prior to non-renewal. People will need time to undertake the mitigation actions.

Regards  
Ralph Bloemers  
Director of Fire Safe Communities

#### References

7th Oregon Climate Assessment - January 2025 - Reimagining the Wildfire Challenge and Local Solutions, available at:  
<https://oregonstate.app.box.com/s/jq5peb44odxde4vkf0nqvjkl7e3aebm8>

NASA - The Fast Fire Threat - <https://earthobservatory.nasa.gov/images/153689/the-fast-fire-threat#>