

March 9, 2026

Assembly Member Damon Connolly
Chair of the Environmental Safety and Toxic Materials Committee
1020 N Street, Room 171
Sacramento, CA 95814

Submitted via Legislative Portal

RE: AB1642 (Harabedian) – Disaster Recovery Reform Act - SUPPORT

Dear Assemblymember Connolly and Members of the Committee:

I write on behalf of the non-profit organization United Policyholders to express our support for AB 1642, introduced by Assemblymember John Harabedian. This measure will establish urgently needed science-based standards for testing, removing and remediating toxic wildfire debris/byproducts from homes, schools, workplaces and other structures as quickly as feasible.

By burning commercial establishments and structures, large numbers of cars, (including batteries) and many other metal and plastic objects, urban conflagrations (WUI wildfires), generate debris and create health risks that require new standards for restoring structures to pre-loss condition.

There are a very large number of insurance claim disputes currently pending in the Los Angeles region due to:

- 1) The absence of science-based standards for post-wildfire testing, remediating and restoration of indoor spaces.
- 2) A pattern and practice by numerous insurers of disregarding, minimizing, downplaying and disputing the threats to human health and lives posed by wildfire debris (contaminants of concern, including metal particulates and soot char and ash).
- 3) A pattern and practice by numerous insurers of cutting off or threatening to cut off benefits for Loss of Use (Additional Living Expenses, temporary living expenses) before damaged homes have been properly tested, remediated, restored and cleared for re-habitation by qualified professionals.
- 4) A pattern and practice by some insurers of spending time and money cleaning soft goods that really can't be cleaned and simply need to be replaced.
- 5) Conflicting views on where, when and how indoor air quality should be tested, whether and how contaminants should be removed following a wildfire, and the extent of destructive testing and restoration required to restore homes to pre-loss condition.

Through the Roadmap to Recovery® education and consumer advocacy work that United Policyholders has been doing in wildfire-impacted regions for nearly three and a half decades, we have been helping insured “partial loss” (“standing home”) property owners whose homes and businesses have been damaged but not destroyed. Through print and digital publications, workshops, webinars and a [“Smoke Damage and Remediation Resources”](https://uphelp.org/smokedamage) online library¹, UP is helping property owners navigate this challenging terrain.

¹ <https://uphelp.org/smokedamage-2/>



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Our support for this bill and the work we are doing is aimed at helping wildfire-impacted homeowners get their insurance claims *properly* investigated, processed and paid so their assets get restored to pre-loss condition and they don't risk illness or worse by moving prematurely back into homes that are contaminated and unsafe. "Properly" in this context means appropriately thorough testing (including porous materials, wall cavities, HVAC systems, attics, basements and crawlspaces) and cleaning, remediation, restoration and clearance for re-habitation by qualified, independent professionals.

In the course of this work, it has become clear that most insurers and the vendors they contract with when adjusting partial loss claims are continuing to handle urban wildfire claims the same as they handle claims arising from rural wildfires that mostly burn vegetation and wood frame structures. It has also become clear that insurers exercise considerable control over the cleaning and remediation companies, industrial hygienists, field testers and testing labs they are using to process partial loss wildfire claims.

In many cases, insurers are authorizing and paying for cleaning without pre-testing to determine the extent and type of contaminants that need to be remediated, and they are expecting insureds to move back into homes that still contain contaminants of concern. In many cases, insurers are disregarding the findings and recommendations of independent professionals hired by their insureds. This is exposing policyholders to serious health risks, unacceptable to a growing number of property owners who reasonably expect their properties to be restored to pre-loss condition, and leading to disputes, delays, costs and litigation.

Existing law does not provide uniform, health-based standards for assessing and restoring indoor air quality after urban/WUI wildfire contamination. AB 1642 appropriately directs the Department of Toxic Substances Control to adopt emergency regulations establishing standards for investigation, environmental testing, contaminant removal, and health-based re-occupancy thresholds. We respectfully suggest that because that Department is under the California Environmental Protection Agency, the charge be directed at the parent agency.

Clear statewide standards will promote public health, reduce disputes over habitability, and support smoother insurance and rebuilding processes. Survivors should not bear the burden of navigating inconsistent remediation practices or unclear safety benchmarks during an already traumatic recovery period.

We respectfully urge your support for AB 1642.

Sincerely,

A handwritten signature in cursive script that reads "Amy Bach".

Amy Bach, Executive Director
United Policyholders