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[www.uphelp.org](http://www.uphelp.org)

April 6, 2026

The Honorable Senator Kayse Jama, Chair  
Senate Committee on Rules  
900 Court Street NE  
Salem, OR 97301

**RE: Oregon SB 1540 – Property Insurance: Wildfire Risk Models and Mitigation – Strong Support**

Dear Chair Jama and Members of the Committee,

I write on behalf of the non-profit organization United Policyholders to convey our strong support for Oregon SB 1540. This measure would require property insurers that use catastrophe models, wildfire risk models, or wildfire risk scoring methods to submit those models to the Department of Consumer and Business Services (DCBS) for review and approval. Critically, the bill would require that these models account for both property-specific and community-level wildfire mitigation actions, and that insurers provide lower rates when such actions reduce risk. Currently, Oregon requires a 45 day renewal/nonrenewal notice for property coverage. United Policyholders respectfully suggests that this bill would provide even greater value if it extended the renewal/nonrenewal notification requirements to allow greater time for insureds to act to implement mitigations that could positively impact their eligibility or premium.

SB 1540 also addresses transparency and consumer protection by requiring insurers to publish information about risk classifications, available mitigation discounts, and the appeals process on their public websites, and to provide plain language written notices to policyholders about coverage decisions. The bill would further establish a statewide wildfire mitigation database, developed by the State Fire Marshal in coordination with the Department of Forestry, to track community-level and property-specific mitigation efforts. These provisions will give Oregon homeowners meaningful incentives to invest in wildfire preparedness and ensure those investments are recognized by insurers.

The experience of other states underscores the importance of regulatory oversight over the catastrophe models and wildfire risk scoring methods that insurers use to make underwriting and pricing decisions. In California, consumer advocates and regulators have raised serious concerns about the use of proprietary “black box” models that produce risk scores and rate calculations that policyholders cannot see, understand, or challenge. The California Department of Insurance has acknowledged that homeowners often do not know what their risk score is or what goes into it, yet those scores can be used to dramatically increase premiums or deny coverage altogether. California has since moved to approve specific catastrophe models for insurer use and passed legislation to create a first-of-its-kind public wildfire catastrophe model to serve as a check on proprietary industry models.

Colorado enacted HB 1182 in 2025, which similarly requires insurers that use wildfire risk models to share model information with the Division of Insurance, consider property-specific and community-level mitigation efforts when assessing risk, provide mitigation-related premium discounts, and give policyholders annual written notice of their wildfire risk scores and classifications. Washington State is also considering parallel legislation. These measures reflect a growing national consensus that wildfire risk models must be subject to regulatory review, must give credit for mitigation, and must operate transparently so that consumers can understand and meaningfully respond to the risk assessments that affect their coverage and premiums.



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Oregon's SB 1540 is well-aligned with this emerging best-practices framework. By requiring model submission and approval, mandating that models account for mitigation, and establishing a statewide database to track mitigation efforts, the bill would position Oregon as a leader in ensuring that wildfire risk modeling serves both market accuracy and consumer fairness. United Policyholders believes these safeguards are essential to maintaining a functional and equitable property insurance market as wildfire risk continues to grow.

We respectfully urge your support for SB 1540.

Sincerely,

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

Amy Bach, Executive Director  
United Policyholders