Jeremy Zagarella RPF #3229
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California Board of Forestry and Fire Protection
Attn: Jane Van Susteren, Regulations Coordinator
P.O. Box 944246
Sacramento, CA 94244-2460

September 2, 2026

Dear Members of the Board:

I am writing regarding the proposed change to 14 CCR § 1621.1(b)(7), which would allow certain public-safety arboricultural work in forested areas to count toward experience for registration as a professional forester.

The proposed addition recognizes that some arboricultural assignments overlap with forest-resource work, especially where public safety, tree condition, and hazardous vegetation are involved. I agree that such experience may be relevant. At the same time, the rule should make clear that this type of work is only one possible component of a forester's professional preparation—not a replacement for supervised forestry practice or work performed in responsible charge.

In my view, the main issue is not whether arboriculture can be relevant; it is how the Board will separate qualifying experience from ordinary tree-service work. Arboriculture can range from individual-tree maintenance near homes to work associated with roads, utilities, public facilities, and other infrastructure in forested settings. Those situations are not equivalent for purposes of professional forester registration.

Because of that range, the phrase "Arboriculture on Forested Landscapes for public safety" would benefit from a narrower definition. As written, it could be read to include residential or ornamental tree care simply because safety is part of the work. That would be broader than the experience required by forestry judgment, resource planning, or landscape-level decision-making.

I recommend that the regulation specify that qualifying arboricultural work must be performed in a forested landscape and connected to public safety at the landscape, or stand, scale of public facilities, public infrastructure, rights-of-way, utility corridors, or similar settings.

A standard framed this way would allow appropriate public-safety experience to be credited while avoiding an unintended expansion into routine arboriculture. It would also give applicants and reviewers a clearer, more consistent basis for determining whether the experience is relevant to professional forestry.

For these reasons, I ask the Board to revise the language or provide clarifying direction that:

1. Explains what qualifies as public-safety arboriculture in a forested landscape; and

2. Limits credit to work connected with public facilities, infrastructure, rights-of-way, utility corridors, or comparable forested-landscape settings at a landscape or stand level.

This approach would maintain the purpose of the amendment while reducing the risk of inconsistent or overly broad application.

Thank you for your consideration.

Sincerely,

Jeremy Zagarella

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Natural Resource Director, Trihydro Corperation