Written Comment for Agenda Item 8(a) – "Exam Fee Amendments, 2026"
California Board of Forestry and Fire Protection Meeting: September 24, 2026

Authored by Jack Little

To the Board,

I submit this comment with the disclosure that it is of my own thought and opinion and not of my employer nor upon their behalf.

In reading proposed changes presented under rulemaking action titled: "Exam Fee Amendments, 2026", many of the proposed changes do not deal with fee amendments but instead are in regard to qualifying time requirements for the RPF exam. I am currently employed as a Forestry Assistant II for the California Department of Forestry and Fire Protection (CAL FIRE). The proposed rule changes carry possible impacts to this and similar classifications. I recognize the PFEC and Board have greater regulatory obligations than just employees of CAL FIRE and appreciate their work in maintaining the integrity of the RPF license.

As a Forestry Assistant II for CAL FIRE, one is typically required to complete mandatory fire training as a probationary condition of employment. These trainings can average 4-6 months in duration and are key in helping us fulfill the mission of the Department. In recent application periods, exam applicants employed as Forestry Assistant II's have had this time deducted from their qualifying time requirement, typically resulting in having to wait for another exam cycle. Historically, this mandatory fire training has counted for others who are now currently employed as RPF's for CAL FIRE.

The additions to Title 14, California Code of Regulations § 1621.1, 1621.5, and 1622 could result in deductions of qualifying time to CAL FIRE employees. Dependent on interpretation of those reviewing applications, a significant amount of time could be deducted from Forestry Assistant II's and others. If it is viewed that these mandatory trainings do not count, it brings to question which other optional ones would also be deducted. Would time spent on emergency incidents also be counted against qualifying time? Would extended leave or absence also be counted against qualifying time?

I would ask the Board to consider if CAL FIRE's required training is somehow compromising the quality of the exam candidate and to what extent the training possesses a nexus to "forestry work". The full curriculum of training should be analyzed to determine if fully deducting it is appropriate. Furthermore, if Department employees are scrutinized to this level, candidates from other fields of employment should also have to explain their training requirements and it's nexus to "forestry work". This would ensure equal application of the statute. Forestry and Fire have an ever-increasing relationship only set to grow over time, and the mandatory training received has a positive impact to a forester's career within the department.

In the Initial Statement of Reasons for "Exam Fee Amendments, 2026", within paragraph two on page four, it reads as follows:

> *"An applicant might have qualifying firefighting experience under §1621.1(b)(3) but may have spent a portion of their working hours doing training, EMT work, or Search and Rescue. This amendment allows the PFEC to accept a portion of that work as "qualifying work experience". This is necessary to ensure that applicants have appropriate experience to qualify for the exam."*

Does the Board or the PFEC have a process in place to objectively review each applicant's training or ancillary duties in their profession to determine what portion is "qualifying work experience? And should it be evaluated to the detail of hours or another appropriate measure of time? This would ensure equal and fair application of law for all applying for the exam.

Regardless of adoption or not, I believe it would be beneficial for the Board and/or the PFEC to discuss the matter with CAL FIRE leadership and other employers to analyze a potential impact to CAL FIRE resource management staff, and development of future RPFs as a whole.

Respectfully,
Jack Little [redacted]