

**BOARD OF FORESTRY AND FIRE PROTECTION**

THE NATURAL RESOURCES AGENCY  
STATE OF CALIFORNIA

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Dear natural resource professional,

In recent months, several complaints have been made to the Board of Forestry, Office of Professional Foresters Registration, alleging the unlicensed practice of forestry. This letter clarifies requirements for Registered Professional Forester (RPF) supervision on forested landscapes in California<sup>1</sup> under the Professional Foresters Law (PFL) and associated regulations.

The PFL<sup>2</sup> is violated when recommendations are offered relevant to forestry on forested landscapes *without* the professional expertise and stamp of an RPF. Public Resources Code section 756 requires forestry work to be supervised by an RPF who oversees the professional practice of forestry and supervises all professional work and documents.

Although the PFL is often mischaracterized as only applying to activities related to the Z'berg-Nejedly Forest Practice Act of 1973<sup>3</sup> and the preparation of timber harvesting documents, the PFL's applicability is far broader in scope. The PFL applies to all forested landscapes in California (including oak woodlands).

The RPF license is held by "natural persons"—not by corporations, nonprofits, or government agencies. There is only one exception to the PFL's requirement that only an RPF practice forestry, found in Section 757 of the Public Resources Code:

*This article does not apply to a landowner who is a natural person and who personally performs services of a professional forester, when those services are personally performed on lands owned by that person. (Emphasis added.)*

"Forestry" is defined, in relevant part, in Section 753 of the Public Resources Code as:

*[T]he science and practice of managing forested landscapes and the treatment of the forest cover in general, and includes, among other things, the application of scientific knowledge and forestry principles in the fields of fuels management and forest protection, timber growing and utilization, forest inventories, forest economics, forest valuation and finance, and the evaluation and mitigation of*

<sup>1</sup> All references to "forested landscapes" mean non-federal forested landscapes in California.

<sup>2</sup> Public Resources Code § 750 et seq.

<sup>3</sup> Public Resources Code § 4511 et seq.

impacts from forestry activities on watershed and scenic values... (Emphasis added.)

“Forested landscapes” are defined in Section 754 of the Public Resources Code as:

[T]hose tree dominated landscapes and their associated vegetation types on which there is growing a significant stand of tree species, or which are naturally capable of growing a significant stand of native trees in perpetuity, and is not otherwise devoted to non-forestry commercial, urban, or farming uses. (Emphasis added.)

“Identity required of Registered Professional Forester in Charge.” 14 CCR 1602.1:

Any letter or document which offers to perform or implies the performance of any professional forestry work must identify by name and license number the forester (RPF) who will be in charge of such work when it is performed. An unregistered assistant acting in the capacity of a professional forester, as defined in 14 CCR 1602 other than on federally owned lands shall be supervised by a forester (RPF). Work plans and documents reporting work done by or under the supervision of a forester (RPF) shall bear the signature and license number of the forester (RPF) responsible for said plans, work and reports.

The Office of Professional Foresters Registration protects the public interest through the regulation of those individuals who are licensed to practice the profession of forestry, and whose activities impact the ecology of forested landscapes and the quality of the forest environment within California.

As such, all forest surveys and inventories, forest restoration, fuels reduction, and mitigation work for vegetation removal on forested landscapes require an RPF to be in charge and supervising, from project development through completion. Certified arborists, vegetation ecologists, botanists, biologists, or individuals from any other discipline may not serve as a substitute for an RPF under California law.

Attached to this letter are excerpts from the PFL, associated regulations, and the California Environmental Quality Act for your reference. Also attached are Board Policies 11 and 12, which provide guidance on activities that require an RPF or a Certified Rangeland Manager. The full text of the PFL and associated regulations are available on the Professional Foresters Registration page of the Board’s website: [CALIFORNIA](#)

Sincerely,



Dan Stapleton, RPF #2707  
Assistant Executive Officer, Foresters Licensing  
California State Board of Forestry and Fire Protection

## **Relevant Professional Foresters Law Statutes and Regulations**

### **Public Resources Code § 752:**

*“Professional forester” as used in this article, means a person who, by reason of their knowledge of the natural sciences, mathematics, and the principles of forestry, acquired by forestry education and experience, performs services, including, but not limited to, consultation, investigation, evaluation, planning, or responsible supervision of forestry activities when those professional services require the application of forestry principles and techniques. (Emphasis added)*

### **Public Resources Code § 753:**

*“Forestry, as used in this article, refers to the science and practice of managing forested landscapes and the treatment of the forest cover in general, and includes, among other things, the application of scientific knowledge and forestry principles in the fields of fuels management and forest protection, timber growing and utilization, forest inventories, forest economics, forest valuation and finance, and the evaluation and mitigation of impacts from forestry activities on watershed and scenic values, to achieve the purposes of this article. The practice of forestry applies only to those activities undertaken on forested landscapes. The professions specified in Section 772 are not practicing forestry when mitigating or recommending mitigation of impacts from previous forestry activities on related watershed or ecological values within their area of professional expertise or when recommending those mitigations for proposed timber operations. However, public and private foresters are required to be licensed pursuant to this article when making evaluations and determinations of the appropriate overall combination of mitigations of impacts from forestry activities necessary to protect all forest resources.” (Emphasis added)*

### **Public Resources Code § 756:**

*Nothing in this article prohibits any person from engaging in those activities otherwise restricted to professional foresters, certified specialists, or qualified but exempt certificant, provided a registrant is in charge of the professional practice or work of that person and all professional work or documents are done by or under the supervision of the registrant. (Emphasis added.)*

### **Public Resources Code § 766:**

*“On and after July 1, 1973, it shall be unlawful for any person to act in the capacity of, or use the title of, a professional forester without being registered pursuant to this article, unless exempted from the provisions thereof.” (Emphasis added)*

**Title 14 of the California Code of Regulations §1602. Professional Forestry Practice Defined:**

*“(a) The phrase “act in the capacity of... a professional forester...” pursuant to Public Resources Code (PRC), Section 766 refers to any person who is working in a responsible position as an individual or through the supervision of others, and performs services on forested landscapes applicable to “forestry” as defined in PRC, Section 753 and clarified herein. Forestry requires specific knowledge of forestry principles for providing advice to, or management for, employers, clients, or others, through consultation; through conduct of investigations in forestry matters which have potential environmental effects, or are for site-specific purposes; through evaluation of forest properties; and through the planning or execution of forest programs, management, operations, and/or treatment. ...” (Emphasis added)*

**CEQA Guideline, Title 14 of the California Code of Regulations § 15149. Use of Registered Professional in Preparing EIRs:**

*“(a) A number of statutes provide that certain professional services can be provided to the public only by individuals who have been registered by a registration board established under California law. Such statutory restrictions apply to a number of professions including but not limited to engineering, land surveying, forestry, geology, and geophysics. ...” (Emphasis added)*

## **POLICY NUMBER 11: GUIDANCE ON THE PRACTICE OF FORESTRY AS IT RELATES TO OTHER PROFESSIONS**

### **Introduction**

The Professional Foresters Law, Public Resources Code §750, et seq. provides that a Registered Professional Forester (RPF) must be involved in projects that require the application of forestry principles and techniques for managing forested landscapes. Forested landscapes are those upon which are growing or naturally capable of growing in perpetuity significant stands of native conifer and/or hardwood trees and their associated vegetation types. These landscapes are typically tree dominated and not devoted to non-forestry commercial, urban or farming uses (Public Resources Code §754).

The Professional Foresters Law provides that a professional forester may only perform forestry services in those areas of expertise for which the person has achieved competency through training or experience. When a professional forester's expertise is exceeded in a particular activity, the forester is compelled to utilize the services of other qualified experts including but not limited to arborists, archaeologists, botanists, civil engineers, ecologists, fisheries biologists, geologists, hydrologists, land surveyors, landscape architects, range scientists, soil scientists, or wildlife biologists. The Professional Foresters Law does not preclude these other environmental professionals from the application of their knowledge and expertise outside of the practice of forestry.

### **Statement I:**

The Board recognizes consistent with the Professional Foresters Law, Public Resources Code §752(b), that there are other environmental professionals capable of supplying technical information relative to particular features of a forested landscape setting by virtue of education, training and experience. The Board endorses an interdisciplinary approach in the management and treatment of natural landscapes. Just as the Professional Foresters Law requires that an RPF interact with other qualified experts when the RPF's expertise is exceeded in the context of a particular activity, the Board finds that other qualified experts should likewise interact with RPF's as appropriate to the environmental setting.

### **Statement II:**

The Board recognizes that forested landscapes may be identified using a variety

of vegetation classification systems including but not limited to the California Wildlife Habitat Relationship System (see the California Department of Fish and Game website link to the [CWHR System](https://wildlife.ca.gov/Data/Analysis/CWHR) (<https://wildlife.ca.gov/Data/Analysis/CWHR>) and the California Department of Forestry and Fire Protection-Fire and Resources Assessment Program link to [CWHR map layers](https://www.fire.ca.gov/Home/What-We-Do/Fire-Resource-Assessment-Program/GIS-Mapping-and-Data-Analytics) (<https://www.fire.ca.gov/Home/What-We-Do/Fire-Resource-Assessment-Program/GIS-Mapping-and-Data-Analytics>); A Manual of California Vegetation by Sawyer and Keeler-Wolf; CDFG's Vegetation Classification and Mapping Program (VegCAMP); various California Native Plant Society (CNPS) publications; and Preliminary Descriptions of the Terrestrial Natural Communities of California by R.F. Holland (updated 1996).

### **Statement III:**

The Professional Foresters Law provides that the practice of forestry and rangeland management on forested landscapes includes among other things actions directed toward fuels management, forest protection, grazing on forested rangelands, timber growing and utilization, forest inventory, forest economics, forest valuation and finance, and the evaluation and mitigation of impacts from forestry activities on watershed and scenic values. Tasks associated with the practice of forestry and rangeland management include but are not limited to the following:

- Development of fuel hazard reduction prescriptions. Participation in the interdisciplinary development of technical aspects of wildfire protection plans.
- Evaluation of fire hazard, pest conditions (insects and disease), and the effects of damaging agents on the overall health of forests and woodlands. Development of treatments for the prevention and control of damage to forests and woodlands.
- Management planning and prescription development in support of wood product utilization.
- The determination of diameter, height, form, weight, growth rate, volume, or age of individual or groups of trees; or interpretation of such determinations to support forest management actions or the treatment of forest cover in general.
- The determination of economic value of a particular forest or woodland.
- Quantification or modeling of past, present, and future forest carbon stocks on forested landscapes for the purpose of monetization of various forest carbon pools.
- The evaluation of forest/woodland conditions in response to past management actions and the development of mitigation measures for remediation or control of potentially deleterious effects.
- Recommendations regarding prescriptive grazing on forested rangelands.

### **Statement III (Continued):**

The Board recognizes that performance of the following tasks does not constitute the practice of forestry or rangeland management unless the tasks are exclusively directed toward the management and treatment of forests and woodlands:

- Providing retention or removal recommendations for trees associated with specific development improvements.
- Classification of vegetative or habitat types as indicated in item II above.
- Collection of tree species data (i.e. number of trees per acre, tree diameters, heights, etc.)
- Characterization of individual tree condition (i.e. pathology, injury assessment, health and vigor rating, etc.)
- Valuation or appraisal of individual tree(s) value, or loss as landscape elements, for trees associated with development.
- Preparation of tree protection plans pursuant to jurisdictional requirements if it is concluded by the Lead Agency that individual or groups of trees shall be retained on site in proximity to construction activities.
- Mapping, acreage/canopy cover determination or other site evaluations through photogrammetry, Geographical Information Systems (GIS), and/or surveyed location of individual or stands of trees.
- Mitigating or recommending mitigation of impacts from previous or proposed land use activities by other environmental experts within their field of expertise.
- Determinations of significance under CEQA.

### **Statement IV:**

The Board acknowledges that pursuant to 14 CCR §15149(b) a CEQA document such as an EIR is not a technical document that must be prepared solely by state registered professionals. CEQA documents are intended to disclose for public benefit and agency review the potential adverse effects of a proposed project on the environment and to identify ways to reduce or mitigate such potential adverse effects. The extent to which full and accurate disclosure of potential adverse effects and mitigations necessitates the preparation of technical studies by state licensed professionals is at the discretion of the lead agency *consistent with Professional Foresters Code and State Laws. (emphasis added)*

## **POLICY NUMBER 12: GUIDANCE ON THE CERTIFIED RANGELAND MANAGER PROGRAM**

### **Introduction**

The purpose of this policy statement is to clarify those management activities on rangelands that are most appropriately carried out by a Certified Rangeland Manager (CRM). The Professional Foresters Law, Public Resources Code §750, et seq. provides for the issuance of specialty certificates, "... in such fields of specialization as the Board may by regulation establish" (PRC §762). The only specialty certificate currently provided by Board regulation is that of the Certified Rangeland Manager. This specialty was created in 1995 through the efforts of the California Section of the Society for Range Management with the support of the California Department of Forestry and Fire Protection. In so doing, the California Section, now the California-Pacific Section (Cal-Pac SRM) sought to promote and strengthen professional standards in all activities devoted to rangeland resources. The Cal-Pac SRM professional certification is designed to distinguish and maintain a professional level of rangeland management expertise and provide continuing education and accreditation services to the profession.

The Board of Forestry and Fire Protection, through its Professional Foresters Examining Committee (PFEC), provides administrative oversight and annual review of the Society's program to ensure compliance with State-mandated requirements to fully protect the public's interest.

A Certified Rangeland Manager applies scientific principles to the art and science of managing rangelands. Rangelands are lands supporting grass, shrub, and savanna vegetation types pursuant to the Cal-Pac SRM Program for Certification of Professional Rangeland Managers (14 CCR §1651(c)). This program of certification is a service provided by Cal-Pac SRM as a means for demonstrating and supporting the special expertise required to practice as a Certified Rangeland Manager. Pursuant to 14 CCR §1651(a), a CRM shall perform professional services only in those subjects in which he or she is competent by training and experience.

The CRM license is required for professional practice of rangeland management on non-federal forested landscapes as a specialty authorized under a modification of the Professional Foresters Licensing Act (AB1903, January 1, 1992) that requires the Registered Professional Forester license for the practice of forestry. The CRM license recognizes expertise that is desirable, and recommended for all

rangeland management activities, but it is not legally required unless the activity occurs on forested landscapes.

**Statement I:**

The Board recognizes that rangelands may be identified using a variety of vegetation classification systems including but not limited to the California Wildlife Habitat Relationship System (see the California Department of Fish and Wildlife website link to the CWHR System (<https://wildlife.ca.gov/Data/CWHR>) and the California Department of Forestry and Fire Protection-Fire and Resources Assessment Program link to [CWHR map layers](https://wildlife.ca.gov/Data/Analysis/CWHR) (<https://wildlife.ca.gov/Data/Analysis/CWHR>); A Manual of California Vegetation by Sawyer and Keeler-Wolf; CDFG's Vegetation Classification and Mapping Program (VegCAMP); various California Native Plant Society (CNPS) publications; and Preliminary Descriptions of the Terrestrial Natural Communities of California by R.F. Holland (updated 1996).

"Forested landscapes" are defined by California Code of Regulations, title 14, section 754 as "tree dominated landscapes and their associated vegetation types on which there is growing a significant stand of tree species, or which are naturally capable of growing a significant stand of native trees in perpetuity, and is not otherwise devoted to non-forestry commercial, urban, or farming uses".

"Rangeland" means the land on which the existing vegetation, whether growing naturally or through management, is suitable for grazing and browsing.

"Rangeland" includes any natural grasslands, savannas, shrublands, deserts, woodlands, and wetlands which support a vegetative cover of native grasses, grass-like plants, forbs, shrubs, or naturalized species. "Rangeland" is "land that is dominated by vegetation other than trees. Many woodlands (including Eastside ponderosa pine, pinyon, juniper, chaparral, and oak woodlands) are included in 'rangelands' because their response to range management principles and activities are similar to those of other shrubby ecosystems."

The Board further recognizes the boundaries between forests and rangelands and the associated professional practices are often overlapping. Thus, the CRM license requirements apply to any landscape of mixed forested and non-forested vegetation types with significant interactions of range and forest management.

**Statement II:**

Tasks associated with the practice of rangeland management include but are not limited to the following:

- Drafting rangeland management plans to meet specific natural resource

objectives, including:

- Vegetative fuel management on rangelands;
- Control or management of invasive species;
- Reintroduction or increase of desirable species;
- Improvement of economic viability of rangeland;
- Mitigation of potential environmental effects.
- Developing and implementing means of improving or maintaining watershed function.
- Conducting rangeland inventories and assessments.
- Making recommendations regarding prescriptive grazing on rangelands.
- Planning and implementation of rangeland monitoring programs.
- Providing recommendations regarding conservation of, and regard for, rangeland as an expression of open space, viewshed, watershed and other public benefits.

### **Statement III:**

The Board recognizes that performance of the following tasks does not constitute the practice of rangeland management, under the Professional Foresters Law, unless the tasks are principally directed toward the management and treatment of rangelands:

- Mapping, acreage/vegetative cover determination or other site evaluations through photogrammetry, Geographical Information Systems (GIS), and/or surveyed location.
- Mitigating or recommending mitigation of impacts from previous or proposed land use activities by other environmental experts within their field of expertise.
- Determinations of significance pursuant to the California Environmental Quality Act (CEQA).

It is important to note that, pursuant to PRC §757, landowners are specifically exempted from the necessity of compliance with the Professional Foresters Law, including the provisions of the CRM Program, when directly managing their own lands. It is likewise noteworthy and illustrative of the distinction between the roles of the CRM and the Registered Professional Forester (RPF) that pursuant to 14 CCR §1651(b), a CRM providing range management services related to rangeland resources on forested landscapes must consult with a RPF if there are potential impacts on related forest resources. And conversely, RPFs providing services related to forest resources must either have rangeland experience or consult with a CRM if there are potential impacts on related rangeland resources.

**Statement IV:**

The Board acknowledges that pursuant to 14 CCR §15149(b) a CEQA document such as an EIR is not a technical document that must be prepared solely by state certified professionals. CEQA documents are intended to disclose for public benefit and agency review the potential adverse effects of a proposed project on the environment and to identify ways to reduce or mitigate such potential adverse effects. The extent to which full and accurate disclosure of potential adverse effects and mitigations necessitates the preparation of technical studies by state certified professionals is at the discretion of the lead agency consistent with Professional Foresters Code and State Law. (emphasis added)