Board of Forestry and Fire Protection

SUPPLEMENTAL STATEMENT OF REASONS

"Exam Fee Amendments, 2026"
Title 14 of the California Code of Regulations (14 CCR),
Division 1.5, Chapter 10, Articles 1 and 2

Amend §§ 1605, 1621.1, 1621.2, 1622, 1622.2 and add § 1621.5

The Board of Forestry and Fire Protection (Board) intends this Supplement to the Initial Statement of Reasons (ISOR) to reflect changes that have been made to the 45-day proposed rule text and Initial Statement of Reasons, which was distributed on August 7,2026.

SPECIFIC PURPOSE OF EACH ADOPTION, AMENDMENT OR REPEAL (pursuant to GOV § 11346.2(b)(1)) AND THE RATIONALE FOR THE AGENCY'S DETERMINATION THAT EACH ADOPTION, AMENDMENT OR REPEAL IS REASONABLY NECESSARY TO CARRY OUT THE PURPOSE(S) OF THE STATUTE(S) OR OTHER PROVISIONS OF LAW THAT THE ACTION IS IMPLEMENTING, INTERPRETING OR MAKING SPECIFIC AND TO ADDRESS THE PROBLEM FOR WHICH IT IS PROPOSED (pursuant to GOV §§ 11346.2(b)(1) and 11349(a) and 1 CCR § 10(b)).

Amend § 1621.1

In § 1621.1(b)(6), the proposed rule change removes an extraneous comma and a space on page 4, line 7, after the phrase "timber appraisals" and before the word "forestry." The problem was that the 45-day noticed rule text retained a typographical punctuation and spacing error when striking adjacent text, which was identified during the 45-day public comment period. The purpose of the change is to correct the grammar and punctuation of the sentence. This is necessary for the clarity and consistency of the rules.

In § 1621.1(b)(3) the proposed rule change inserts "the identification for cutting or removal or both of hazard trees on Forested Landscapes" into existing § 1621.1(b)(3) under forest protection. Under Public Resources Code (PRC) § 753, "forestry" refers to the science and practice of managing forested landscapes and the treatment of the forest cover in general, including the application of scientific knowledge and forestry principles in the fields of fuels management and forest protection. Furthermore, PRC § 754 defines "Forested Landscapes" 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 are not otherwise devoted to non-forestry commercial, urban, or farming uses.

The proposed rule change also strikes the 45-Day noticed text in § 1621.1(b)(7) in its entirety—which had proposed adding "Arboriculture on Forested Landscapes for public safety" as a standalone category of qualifying forestry work experience.

The problem is that the 45-Day noticed rule text in § 1621.1(b)(7) used the broad term "arboriculture

on Forested Landscapes for public safety," which created ambiguity and potential confusion with non-qualifying arboriculture in § 1621.2 regarding what specific forestry activities qualify toward the seven years of forestry work experience required under PRC § 769(b). Rather than creating a separate subsection for public-safety arboriculture, identifying hazard trees for cutting or removal on Forested Landscapes is more accurately categorized under § 1621.1(b)(3) (forest protection, which already encompasses the prevention and control of damage to forests and the prevention and control of wildfire) and is already subject to the existing two-year qualification limit in § 1621.1(b)(3) unless the requirements of § 1622(c) are met. The purpose of the change is to remove the proposed language in 14 CCR § 1621.1(b)(7) as noticed, and insert revised language within 14 CCR § 1621.1(b)(3) that expands the pathways by which people gain qualifying forestry experience under the Professional Foresters Law to qualify to take the Registered Professional Foresters Exam, as stated in the ISOR, and to ensure that only up to two years of experience gained pursuant to the revised language qualify, which currently exists in 14 CCR § 1621.1(b)(3). This is necessary to ensure that applicants have appropriate experience to qualify for the exam and to promote clarity and consistency within the rules.

Amend § 1621.2

The proposed amendment as noticed in the 45-Day text modified the language in § 1621.2 regarding non-qualifying forestry-related work experience for arboriculture. Under the currently existing rule text, § 1621.2 lists forestry-related work experiences that do not qualify as forestry work experience for the exam, which includes all arboriculture, alongside landscape gardening and shade tree work. With the addition of arboriculture on forested landscapes for public safety to § 1621.1(b)(7) within the 45-day noticed rule text, § 1621.2 was also amended within the 45-day noticed rule text to carve out an exception for arboriculture conducted on forested landscapes for public safety.

The 45-day notice text in § 1621.2 proposed carving out an exception for arboriculture conducted on Forested Landscapes for the purposes of public safety to correspond with proposed § 1621.1(b)(7). Public comments were received; therefore, the Board is revising the rule text in response to the public comments. Because the Board is striking § 1621.1(b)(7) and removing the phrase "arboriculture on Forested Landscapes for public safety" from the rulemaking entirely and instead addressing the identification for cutting or removal or both of hazard trees on Forested Landscapes under forest protection in § 1621.1(b)(3) retaining the exception in § 1621.2 is no longer necessary. Furthermore, keeping arboriculture listed as non-qualifying in § 1621.2 ensures that routine arboricultural work, such as tree work to maintain trails in a park, maintenance of ornamental or shade trees in campgrounds, parks, or residential areas, aesthetic pruning, or routine tree care that does not involve the complexity or application of forestry principles on forested landscapes required by PRC §§ 753, 754, and 769. The purpose of the change is to remove the proposed 45-day amendment to § 1621.2 so that the section remains aligned with the revisions to § 1621.1 and continues to exclude arboriculture as a qualifying work experience. This is necessary to prevent routine or non-forestry arboricultural work from being credited toward Registered Professional Forester exam eligibility and to promote the clarity and consistency of the rules.

Amend § 1622

No amendments to § 1622 (c)(1) were proposed in the 45-day rule text as noticed. The proposed amendment to § 1622(c)(1) in this revision is to add clarifying language that work identifying hazard trees for cutting or removing or both for forest protection does not qualify as "having charge of

Forestry Work" or "Forestry Work Under the Supervision of a Person Registered" as outlined in § 1622 et seq. The problem is that as originally noticed, § 1621.1 (b)(7) included that work experience gained pursuant to § 1621.1 (b)(7) does not qualify as "having charge of forestry work, or forestry work under the supervision of a person registered" and that because the description of the experience was amended as described above and moved into § 1621.2 (b)(3), in order to maintain that the additional experience pathway will not qualify as "having charge of forestry work, or work under the supervision of a person registered," clarifying language is needed within § 1622 (c)(1) that clearly states "work identifying hazard trees for cutting or removing or both for forest protection does not qualify."