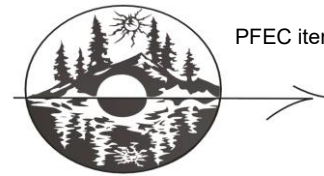


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To: Dan Stapleton

BOF Licensing. PFEC

SUBJECT: Considerations of pathways to the Registered Professional Foresters License.

I was having dinner with my wife recently and in conversation we were discussing professional licenses between us, hers a teaching credential, and mine the Registered Professional Foresters license. An epiphany came to me listening to her describe how a person can get a “provisional teachers credential” right out of college, followed by a credential course and examination. They then work towards a full teaching credential by achieving a certain time of experience in the work place (school setting). Ah! I said. This model puts required work experience AFTER the Exam.

I thought about this for a moment in the context of our process to become an RPF and some of the hurtles people face taking the RPF exam several years after completing college. In our process people are gaining qualifying time under an RPF but they are not necessarily gaining the knowledge for the different exam categories. In fact, I believe many people lose some of the skill-sets they learned in college once they enter the workforce. If you think about all the RPF exam categories for a moment, I bet many recent forestry school graduates are more equipped to take and successfully pass the exam right out of college. Mensuration and present net worth, certainly, cruise design, certainly, GHG analysis, forest finance, very likely. I don’t believe the work experience is all that it’s cracked up to be in preparing a person for the exam. Personally, I didn’t benefit from it much. I have seen some pretty vague and unrelated qualifying work that really has no value or context to helping prepare a person to take the exam. People typically find old tests, take the RPF exam course, visit the Licensing website, and glean onto dusty old binders assembled by RPF’s of past test content and form peer-level study groups.

I challenge you to provide any good reasoning why our exam process shouldn’t consider a more flexible model similar to the teaching credential where the ability to sit for the exam is more “up-front” in the process.

Let me outline a simple hypothetical model for you:

| Graduate from an approved Forestry College. The graduate provides proof of completion as is required now. | Qualifies you to take the RPF exam to secure a “provisional license or specialty certificate.” The applicant uses the same form to apply for the exam without the work experience records | Upon 3 years of work experience under an RPF or several RPF’s, the applicant through BOF approval is granted a “full” RPF license. |
|--|--|--|
| Nothing changes here. | Benefit: Issuance of a “provisional license” or “Specialty Certificate” would have a different fee structure. This creates an additional income stream for the Licensing Program. | Benefit: This model provides increased commitment for people to continue into the RPF Profession. You will reduce losing forestry majors to other fields during the work experience phase because they are “locked into” the process |
| Benefit: Schools are more likely to consider the students’ needs | | Benefit: this model could envelope the mentorship |



| | | |
|--|--|---|
| <p>and goals right out of college. The alignment of college courses relative to RPF exam content would be more direct without a 3 year time lag.</p> | | <p>program (in concept development / Ref: YG) by shaving off a year should a provisional license holder complete this program. So two years of work under an RPF and completion of the mentorship program secures the work exp time towards a full license.</p> |
|--|--|---|

The current pathway would not be abandoned, in fact for some people it may still be a preferred way to the RPF license. To this I would say either option would be a valid pathway to the RPF license. This can increase an individual’s desire to continue commitment to be an RPF.

What it really boils down to is this. With where the profession is now, facing declining numbers and a wide range of other closely related career fields drawing Forestry graduates people away, does it matter in which order a person completes the current requirements?

Licensing budget is relying on active licenses and the downstream asset of 30-year “seniors” of the profession. Through that same lens shouldn’t the incoming individuals to the profession also be considered as valuable fiscal upstream assets. A provisional license or specialty certificate does just that.

I fully recognize the regulatory burden to change regs and statute, but where are we in California Forestry now? Everything is not going swimmingly well for the profession or the holders of assets created by the licensed professionals (Timber Harvest Documents) right now anyways.

REGULATORY CONSIDERATIONS.

Regulation is complex, and modifying regulation is no easy task. I fully recognize the heavy lift especially dealing with statute law in PRC.

Several conceptual rule changes discussed below establish the authority of the Board to create Certificates of Specialization.

762. Certificates of specialization.

The board may by regulation provide for the issuance of certificates of specialization in such fields of specialization as the board may by regulation establish.

- *Consider the provisional license may be called a “Certified Specialist Forester”, and supported as a specialist category under PRC 772 & 782.*

769. RPF License Qualifications.

An applicant shall meet all of the following qualifications:

- Be of good moral character and have a good reputation for honesty and integrity.
- Furnish evidence of having completed seven years of experience in forestry work. Possession of a degree of bachelor of science, or equivalent degree as determined by the board, with a major in forestry, shall be deemed equivalent to four



years of experience in the actual practice of forestry work. At least three of the seven years of experience shall include having charge of forestry work, or forestry work under the supervision of a person registered, or qualified for, but exempt from, registration under the provision of this article. Work completed prior to July 1, 1973, shall qualify if it was under the supervision of a qualified forester, as defined in Section 754. The award of a master of forestry degree shall be acceptable as evidence of one year of such qualifying experience.

(c) Has successfully completed such examination or examinations as are prescribed by the board.

- *769 would have to be changed to address the "Licensing" Qualifications separate from the "Examination" Qualifications. Interesting that 769 as written does not prescribe the "order" in which the qualifications must be met. I discuss conceptual examination qualifications further on in this section.*

772. Certified specialist; registration; specialties.

Instead of being registered as a professional forester, an applicant may request to be registered as a certified specialist in one or more fields of forestry. Nothing in this article shall authorize the board to certify or otherwise license wildlife biologists, fisheries biologists, botanists, ecological restorationists, stream restorationists, hydrologists, or geologists. Registration in a specialty area does not prohibit a professional forester from providing services within that professional forester's area of expertise. Any public agency or professional society may submit for board recognition its independent certification program as full qualification without examination for the board's certificate of specialization. That certification as a specialist shall be granted provided the board determines the program fully protects the public interest in that area of practice encompassed by the program. Those certificants are subject to board registration and discipline with review by that specialty.

- *Consider the conceptual addition: 772(a) A "Certified Specialist Forester" shall be registered upon successful completion of the Examination and documented proof of having direct supervision of an RPF.*

1650. Specialties.

(a) As an alternative to being registered as a RPF, any person qualified pursuant to this Article is eligible for certification in a specialty. Both RPFs and non-RPFs are eligible for certification in a specialty. Only a person registered as a Certified Specialist may use this title of that specialty.

A certificate in each specialty created will be issued by the Board pursuant to the Section 772 of the Code. Specialties will be created by regulation as the need arises.

(b) The following certified specialties shall be implemented and overseen by the Executive Officer, with the assistance of the PFEC:

- *According to this section the Board "will" create specialties as the need arises. The remainder of this section as written establishes governance of the specialty. I'd say with projections of declining RPF numbers ...the need is real!*

1600. Definitions.

For the purposes of the Rules and regulations contained in this chapter, the term:

"Board" means the State Board of Forestry and Fire Protection.

"Certified Specialist" refers to a person who holds a valid certification in a specialty created by the Board.



“Code” or “PRC” refers to the Public resources Code, unless otherwise specified.

“Committee” or “PFEC” means the Professional Foresters Examining Committee.

“Executive Officer” refers to the Executive Officer, Foresters Licensing.

“Forest Resources” means those uses and values associated with, attainable from, or closely tied to, forested landscapes, and includes but is not limited to aesthetics, fish, forage, recreation, soil, timber, water and watersheds, wilderness, and wildlife.

“Registered Professional Forester” or “RPF” refers to a person who holds a valid license as a professional forester pursuant to the provisions of the code.

- *Consider a conceptual definition: “Certified Specialist Forester” or “CF” refers to a person who holds a valid “Forest certification” upon successful completion of Examination. All “Certified Specialist Foresters” shall work only under supervision of an RPF as required under CCR 1622. Model documentation of time under RPF supervision can follow the elements of 1622.2.*

The following rule sections describe the regulations required to take the examination. Look at this rule section only through the lens of taking the Examination, not getting the License.

1621. Evaluation of Qualification to Take the Examination.

In complying with Sections 768 and 769(b) of the Code, the standards set forth in Sections 1621.1, 1621.2, 1621.3, 1621.4, 1622, and 1622.2 of this article are used to evaluate qualifications for authorization to take the exam.

768. Demonstration of experience and knowledge.

The board shall require an applicant to demonstrate such degree of experience and such general knowledge of the profession of forestry as the board deems necessary for the protection of the public.

Similar to PRC 769. Examination Qualifications.

An applicant shall meet all of the following qualifications:

- *Conceptually consider: (b) Furnish evidence of having completed **four** years of experience in forestry work. Possession of a degree of bachelor of science, or equivalent degree as determined by the board, with a major in forestry, shall be deemed equivalent to four years of experience in the actual practice of forestry work. At least three of the **four** years of experience shall include having charge of forestry work, or forestry work under the supervision of a person registered, or qualified for, but exempt from, registration under the provision of this article. Work completed prior to July 1, 1973, shall qualify if it was under the supervision of a qualified forester, as defined in Section 754. The award of a master of forestry degree shall be acceptable as evidence of one year of such qualifying experience.*
- *Sections 1621.1, 2,3,4 and 1622 don't change.*

1621.1. Qualifying Forestry Work Experiences.

(a) “Forestry work,” within the meaning of Section 769 of the Code, includes those activities which demonstrate professional competence in the science, art, and practice of managing and using for human benefit while protecting the public interest, the natural resources that occur on and in association with, forest land.

(b) Forestry experience qualifying to take the exam shall demonstrate an increasing level of responsibility and complexity over the required time, and is more particularly classified as:

(1) Forest management, which includes that branch of forestry concerned with overall administration in forest economics, legal and social aspects; forest mensuration, forest regulation, and the development of access for protection and management of the resource.



- (2) Silviculture, which includes the science and practice of controlling the composition, constitution, and growth of forests, including also stand improvement, forest nursery production, the techniques of seeding and planting, and reforestation.
- (3) Forest protection, which includes the prevention and control of damage to forests, inclusive of control of forest pests; the prevention and control of wildfire; the protection of soils from erosion, and the reduction and repair of damage resulting from all of these and those related to climatic agent. Up to two years of the activities in this subsection qualify except when Section 1622(c) are met.
- (4) Forest utilization which includes scaling, and logging involving felling, bucking, choker setting, and Skidding/Yarding. Up to two years of the activities in this subsection qualify except when Section 1622 of this article applies: additional time can qualify when conditions in 1622(c) are met.
- (5) Forest and watershed management planning, initiated and carried out in:
- (A) forest working plans,
 - (B) forest practice standards,
 - (C) management contracts,
 - (D) litigation reports and testimony,
 - (E) trespass,
 - (F) the development, maintenance and protection of wildlife habitat and forest range resources,
 - (G) forest recreation and environmental studies, and
 - (H) reconnaissance and mapping in conservation of forest and watershed lands and the yield thereof, including the investigation of wildlands soils.
- (6) Other forest activities, including timber appraisals, forestry research, urban forestry, and teaching college or university courses in forestry.

1621.2. Non-Qualifying Forestry-Related Work Experience.

Some forestry-related activities are not considered “forestry work” experience within the meaning of Section 769 of the Code: landscape gardening; horticulture; arboriculture; tree surgery; loading and hauling of logs or other forest products, operations of wood manufacturing or remanufacturing plants; fire lookouts, dispatchers, and fire equipment operators; and agricultural pursuits not related to tree growing.

1621.3. Work Experience Obtained While In a Degree Program.

The following criteria applies to substitutions for forestry work experience toward the seven year requirement. No combination of education and work experience may be counted as more than twelve (12) months for any consecutive twelve month period. Thus, periods worked while in a substituted educational degree program do not qualify because this time is already included in the degree. Work periods that exceed the amount of degree time substituted do qualify.

1621.4. Substitution of Education for Experience.

(a) For the purpose of this article and in accordance with Section 769(b) of the Code, a course of study shall be deemed a major in forestry only (1) if the awarding institution specifically designated the course of study as a major in forestry or a direct derivative thereof such as a major in forest management or a major in forest science, and (2) if it provides the significant concepts in a working knowledge of forest biology, forestry in the social context, forest resources inventory, forest ecosystem management, and forest resources administration. The forest courses presenting such concepts and working knowledge shall be at a level qualifying for transfer credit in a program leading to the Bachelor of Science degree with a major in forestry at either the University of California, Berkeley, California Polytechnic State University at San Luis Obispo, or at Humboldt State University.

In accordance with these standards, a “major in forestry” for the purposes of this act are majors in forestry offered in California, at the University of California, Berkeley, California Polytechnic State University at San Luis Obispo, and Humboldt State University and the programs in forestry offered in other states, which meet the above standards including such programs offered at universities accredited at the time of applicant graduation by the Society of American Foresters (SAF) as of their most current list. The list(s) may be obtained from Professional Foresters Registration, or SAF, 5400 Grosvenor Lane, Bethesda, Maryland, 20814-2198.



(b) The following degrees are deemed the equivalent of four years of forestry experience:

(1) A Bachelor of Science degree with a Major in Forestry, or possession of a Bachelor of Science in Forestry degree from any college or university in the United States or Canada.

(2) A degree in forestry, however designated, from a foreign college or university based on completion of a program of at least four years of university level work with a major in forestry, subject to review and favorable recommendation of the Examining Committee.

(3) A Master of Forestry degree awarded an applicant who holds either a Bachelor of Science degree or a Bachelor of Arts degree with a major in a field other than forestry may submit such evidence as a comparable degree to the Bachelor of Science in Forestry degree.

(c) The Committee shall evaluate and determine, on a case-by-case basis, which other college or university degrees may be substituted as qualifying forestry work experience. In no case can any of the following be combined for more than four years substitution.

(1) A Bachelor of Science degree in a forestry-related field is not equivalent to a Bachelor of Science degree with a major in forestry. No more than two (2) years shall be substituted for such forestry-related fields including, but not limited to , wood science and technology, wildlife management, range management, soil science or conservation of natural resources.

(2) A Master of Science or Doctor of Philosophy degree in forestry or forestry-related fields can be substituted only when subsection 1621.4(b) of this article does not apply. No more than one (1) year for each of these degrees shall be substituted. A Master of Forestry degree is substituted for only one (1) year unless subsection 1621.4 (b)(3) of this article applies.

(3) An Associate of Science or Associate of Arts with a “major in forestry” from one of the two-year colleges recognized at the time of applicant graduation by the Society of American Foresters can be substituted for two (2) years’ experience. The lists(s) may be obtained from Professional Foresters Registration, or SAF, 5400 Grosvenor Lane, Bethesda, Maryland, 20814-2198.

1622. Three Years of “Having Charge of Forestry Work,” or “Under the Supervision of a Person Registered.”

(a) The minimum of three (3) years “having charge of forestry work,” or “forestry work under the supervision of a person registered, or qualified for, but exempt from registration” as specified in Sections 757 and 769(b) of the Code is evaluated using the criteria in subsection (b), below.

(b) “Supervision” shall be deemed adequate to meet the three year requirement if it includes the following elements:

(1) Supervisor is able to hire and fire or effectively recommend same, or is able to clearly withdraw professional responsibility for forestry related matters.

(2) Supervisor must perform regular and timely quality control, work review and inspection, both in the office and in the field, and be able to take, or effectively recommend, corrective actions where necessary. The frequency of review, inspection and guidance shall take into consideration the experience of the non-RPF and technical complexity of the job, but shall be sufficiently frequent to ensure the accomplishment of work to professional standards.

(c) The following limitations apply to the requirement of three years “having charge of forestry work,” or “under the supervision of a person registered.”

(1) Forestry work stated in subsection 1621.1(b)(3) and 1621.1(b)(4) of this article must be performed at planning and supervision levels; scaling does not qualify unless it is part of an apprentice trainee program under the direct supervision of an RPF.

(2) Only the Master of Forestry degree, in conjunction with a qualifying Bachelor of Science degree with a major in forestry, may be substituted for one of the three years required as provided in Section 769 of the Code.

- *For the sections above I would like to see the ability of a person working under this category to incur a “compounded time benefit” if they are enrolled in a “Forestry” mentorship program. The mentorship program will count for one year of “Forestry work”. If a person is enrolled in a mentorship program during the course of employment and they successfully complete that program, they can accrue two years of credit towards this requirement. Parts of this proposed change are supported by the following:*

**1622.2. Contracting Forestry Work Experience.**

Forestry experience obtained while working as a contractor may be claimed as having charge of forestry work, or forestry work under the supervision of a person registered, or qualified but exempt from, registration provided:

- (a) The applicant submits a copy of the contract and any documentation necessary to verify the appropriateness of experience.
- (b) The contract required the work of the contractor to be supervised as stated in Section 1622(b) of this article.
- (c) The contract or documentation specifies the various items of supervision including, but not limited to: training; frequency of contact both for professional and contract compliance purposes; office and field review; and how corrective actions can be taken.
- (d) The contract or documentation has the names, current addresses, and phone numbers of each qualified forester who directly carries out this supervision. If the supervisor is Registered, the license number must be included.

- *Above code can be considered as model process to document work experience of a "CF" under RPF supervision.*

If you have any questions or comments don't hesitate to reach out. I hope you share this with the rest of the PFEC and the Board.

Thank you,

Robert Little , RPF 2651.