



May 27, 2016

Mr. Saul Larsen, Policy Analyst
Colorado Department of Regulatory Agencies
Executive Director's Office
1560 Broadway, Suite 1550
Denver, Colorado 80202

RE: ASLA Colorado Positions and Comments on the Landscape Architects Professional Licensing Act Sunset

Dear Mr. Larsen:

The American Society of Landscape Architects, Colorado Chapter, is a trade organization representing more than 450 members. Our members work in private practice, non-profit organizations, academic organizations, and government agencies throughout Colorado, including more than 65 landscape architecture, design-build and multi-disciplinary firms, as well as federal government agencies and 9 local governments in Colorado.

Founded in 1973 under the direction of the American Society of Landscape Architects (ASLA), ASLA Colorado advances the profession by advocating the issues that affect members. The association provides professional education and programs and generates overall awareness for landscape architecture to the public through our public relations and government affairs efforts.

We have completed our evaluation of the existing law for the licensure of Landscape Architects. Our process included review of the statute and discussions with allied professional organizations.

Here are our comments and recommendations regarding the current law for the sunset review process:

1. We support continuation of licensure of Landscape Architects in Colorado to protect the public

We strongly feel that the continuation of the licensure of Landscape Architects is necessary. Professional Landscape Architects are licensed practitioners who directly shape both Colorado's physical environment and the quality of life of its citizens. Allowing unlicensed persons to practice landscape architecture and design systems and places intended for use by the public represents a potential for both physical and economic harm to the public. Improperly designed places may also harm natural processes and ecosystems, resulting in loss of habitats and indirectly causing economic harm to the public. This licensure requirement also establishes minimum practice standards for Landscape Architects who design structures and systems to ensure their safety, cost effectiveness and suitability for their intended use.

We refer you to the 2003 research report published by the American Society of Landscape Architects, Washington, D.C., titled *Regulation of Landscape Architecture and the Protection of Public Health, Safety and Welfare*, written by Colorado landscape architect and attorney Alex P. Schatz, J.D., and available online here: https://www.asla.org/uploadedFiles/CMS/Government_Affairs/Member_Advocacy_Tools/PHSW-FINAL.pdf

Schatz writes, in part:

A number of professions are substantially and directly responsible for the orderly development of society's physical, legal, and financial infrastructure. Regulation of landscape architects and other design professionals is a valid step taken by states to foster minimally competent, safe planning of the built environment. In these professions, certain economic influences must be subordinate to basic standards for public health, safety, and welfare.

Landscape architects are responsible for decisions that affect the condition of vital infrastructure, rights-of-way, and significant private and public site development. When performed by negligent, incompetent, or unethical practitioners, landscape architecture has the potential to cause serious personal injuries. Poor landscape architecture practices can seriously impair the value and use of property. Landscape architects document and supervise the construction of hundreds of millions of dollars in infrastructure and site improvements each year, where the potential to produce financial harm is also significant.

This report includes examples of physical injury, property damage, and financial harm from across the spectrum of landscape architecture practice. Physical injuries, for example, have resulted from poor design of outdoor lighting, playgrounds, plantings, parking lots, streetscape, outdoor stairs, decks, walls, earthwork, drainage features, recreational facilities, fencing, and many other aspects of landscape architectural design. Many injuries encountered in the research for this report are examples of irreparable harm caused by incompetent practice of landscape architecture, including fatal and permanently disabling hazards in designs and specifications. Competent landscape architects are able to apply a variety of techniques to mitigate the potential for harm in each of these situations.

– Pages 4-5 of the report

2. We support setting and regulating minimum standards for licensure

We agree with the DORA position to set a minimum standard for licensure of Professional Landscape Architects of a landscape architecture degree and related experience. The impacts on public health and safety from the practice of landscape architecture are varied and complex, and should require having a landscape architect possess a suitable educational foundation in the discipline.

3. We do not recommend any language changes to the current statute

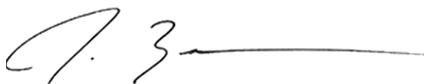
After review of the current statute, we believe that it adequately provides for regulation of the practice of Landscape Architecture in Colorado and no changes are needed.

4. We do not support Continuing Education requirements for renewal of Landscape Architect's licenses

We do not feel that the adoption of Continuing Education for renewal of a Landscape Architect's license is worth considering at this time. Most of the practicing members of the landscape architecture profession utilize some type of education to increase their technical or business knowledge when deemed necessary. This is also an ongoing process that does not depend on a fixed yearly or bi-yearly schedule to accomplish their desired goals.

If we can be of any further assistance, please do not hesitate to contact me.

Sincerely,



Jeff Zimmerman, ASLA
President, ASLA Colorado