



April xx, 2022

Mr. Chuck Smith, President
Council of Landscape Architectural Registration Boards
1900 Reston Metro Plaza, Suite 600 Reston, Virginia 20190

RE: Position on CLARB Resolutions for Membership Vote in April 2022

Dear Mr. Smith:

I am writing you on behalf of the Landscape Architects Technical Committee (LATC) regarding the Council of Landscape Architectural Registration Boards' (CLARB) resolutions for membership vote on April 20, 2022.

The LATC considered the three resolutions at their meetings on January 27, 2022 and April 7, 2022. After careful discussion and review of all related materials presented by CLARB, the LATC cannot support passage of the resolutions at this time. The LATC's position on each of the resolutions is summarized below:

Resolution 1 (Adoption of the CLARB Uniform Licensure Standard for Landscape Architecture) and Resolution 2 (Revisions to the CLARB Model Law and Regulations to align with the Draft Uniform Licensure Standard for Landscape Architecture)

The LATC has decided it cannot support Resolutions 1 and 2 at this time. CLARB's proposed Uniform Standard for Licensure (Standard) does not align with the established California landscape architecture licensure laws and regulations. These laws and regulations reflect past direction from the California Legislature to address barriers to licensure.

As outlined in my previous letters addressing the discrepancies between California's current licensure requirements and the proposed CLARB Standard, CLARB's proposed 8-year experience-only pathway will simply be more restrictive for future California applicants. We did ask CLARB if there was data suggesting it is in the public's interest to support a change to more restrictive criteria and were told that data did not exist. We understand CLARB has made a concerted effort to consolidate the many criteria that exists amongst member jurisdictions. However, The LATC cannot support revisions to its current laws and regulations that would result in a two-class licensee cohort—those previously licensed under the current six-year requirement, and those under an eight-year requirement as is proposed. This is clearly counter to the stated goals of Resolution 1 and would place the LATC in a precarious position with our legislature.

Additionally, the LATC believes that "alternative pathway" under the proposed Standard is ill-defined and does not address a number of critical issues requiring further discussion prior to adoption, including acceptable standardization of alternative education pathways with emphasis on landscape architecture certificate programs, associate degrees and non-accredited four-year

degree programs. The LATC has also expressed concerns regarding CLARB's uniform procedures that recommend allowing candidates with an accredited degree to sit for all sections of the Landscape Architect Registration Examination (LARE) prior to obtaining practical experience, a procedure California strongly opposes.

Furthermore, recent amendments to California Code of Regulations (CCR) section 2620 will establish a 6-year experience-only pathway to licensure and grant additional experience credits for accredited civil engineering degrees, four-year degrees, and training experience under the supervision of a licensed landscape contractor. Recent changes to CCR section 2620 also increase both the amount of credit granted for accredited degrees in architecture from one to two years, and the maximum amount of credit allowed for working as, or under the supervision of a licensed architect or civil engineer from one to three years. Under the proposed CLARB Standard, California would likely have to eliminate most of the alternative pathway credits it now accepts. Once again this would place the LATC in a difficult position with our legislature as we approach our Sunset year in (next Sunset Review 2024).

Resolution 3 (Revisions to the CLARB Model Law and Regulations to promote diversity, equity, and inclusion in licensure standards and to align with CLARB's DEI principles)

The LATC has chosen not to support Resolution 3 as proposed simply because it does not understand how the specified revisions to the CLARB Model Law and Regulations address issues within the profession surrounding diversity, equity, and inclusion. We applaud the efforts of CLARB to address DEI principals, however, how these issues directly relate to the regulation of the profession, and specifically to an application for licensure requires direct evidence that current law is in and of itself discriminatory in nature. The Committee believes further study is necessary to address this matter, and would like to see more specific action items in the form of a CLARB Strategic Plan to address DEI.

The LATC takes seriously the need to expand opportunities for professional licensure including expansion of education and training/practice experience pathways to taking the LARE, and to reducing unnecessary barriers to landscape architecture licensure in California. Alternatively, extending the proposed alternative pathway requirements from 6 years to 8 years, as CLARB suggests, will add an unnecessary barrier to licensure in California. The LATC feels it will be difficult-at-best to justify these statutory and regulatory changes.

I am available to discuss these matters further at the appropriate time and thank you for your time and understanding.

Respectfully,



JON S. WRESCHINSKY
Chair

Attachments: LATC Licensure Standards - Educational and Experience Pathways
LATC Licensure Standards Comparison Chart

cc: Matthew M. Miller, CLARB Chief Executive Officer
CLARB Member Board Executives

LATC Standards – Educational and Experience Pathways

Although the LATC cannot support the resolutions of CLARB as proposed, it is our hope that CLARB would consider adoption of standards similar to current regulation of the LATC.

It is important to note the **LATC** requires a total of **6 years education/training** versus the proposed **CLARB 8-years of education/training**. Reducing the required education/training to 6 years would align with the LATC standards, address DEI, and provide an expanded path to licensure as requested by our state legislature and supportive data. If this reduction is not foreseeable then we would request CLARB adjust their cumulative years of education and training in order to align with the LATC Standards as follows.

LATC STANDARDS- EDUCATIONAL PATHWAYS

Allowed by CLARB

1. Degree in Landscape Architectural Accreditation Board (LAAB) accredited program: *4 years credit toward a 6 year education and training experience requirement. 2 years of experience required upon graduation. This is the only criteria where LATC Standards and CLARB Uniform Standard proposal are aligned, in that 2 years of experience is required.*
2. Degree in **non** LAAB accredited program: *3 years credit toward a 6 year education and training experience requirement. 3 years of experience required upon graduation.*
3. Degree in National Architectural Accrediting Board (NAAB) accredited program: *2 years credit toward a 6 year education and training experience requirement. 4 years of experience required upon graduation.*
4. Degree in Accreditation Board for Engineering and Technology (ABET) accredited program: *4 years credit toward a 6 year education and training experience requirement. 4 years of experience required upon graduation.*
5. Degree from a four-year curriculum program: *1 year credit toward a 6 year education and training experience requirement. 5 years of experience required upon graduation.*
6. Degree in two-year curriculum landscape architecture program: *1 year credit toward a 6 year education and training experience requirement. 5 years of experience required upon graduation.*
7. Certificate in landscape architecture from a University Extension Certificate Program that meets the requirements of section 2620.5: *2 years credit toward a 6 year education and training experience requirement. 4 years of experience required upon graduation.*

Allowed by CLARB as an either/or scenario. Both experience and education are not counted together in CLARB proposal versus being allow in the LATC Standards.

8. Extension program certificate as specified in subdivision (7), and a degree which consists of at least a four-year curriculum: *4 years credit toward a 6 year education and training experience requirement. 2 years of experience required upon graduation.*
9. Extension certificate as specified in subdivision (7) and a degree as specified in subdivision (6): *3 years credit toward a 6 year education and training experience requirement. 3 years of experience required upon graduation.*

Allowed by CLARB

10. 80% minimum completion as specified in subdivision (1) of a degree in LAAB accredited Landscape Architecture program: *1 year credit toward a 6 year education and training experience requirement. 5 years of experience required upon graduation.*
11. 80% completion of a certificate in landscape architecture from a University Extension Certificate Program that meets the requirements of section 2620.5 along with a degree from an educational institution where the degree program consists of at least a four-year curriculum: *1 year credit toward a 6 year education and training experience requirement. 5 years of experience required upon graduation.*

LATC STANDARDS - EXPERIENCE PATHWAYS

Allowed by CLARB

12. Experience as, or experience obtained under the direct supervision of, a landscape architect licensed or registered in the jurisdiction where the experience occurred: *1 -6 years credit toward a 6 year education and training experience requirement.*

Paths not addressed in the CLARB Uniform Standard Policy

13. Experience as, or experience obtained under the direct supervision of, an architect or civil engineer licensed or registered in the jurisdiction where the experience occurred. *1 -3 years credit toward a 6 year education and training experience requirement.*
14. Experience as a California-licensed landscape contractor or a landscape contractor licensed or registered in another jurisdiction where the scope of practice for landscape contracting is equivalent to that allowed pursuant to the California Code of Regulations: *3-5 years credit toward a 6 year education and training experience requirement.*
15. Experience obtained under the direct supervision of a California-licensed landscape contractor, or a landscape contractor licensed or registered in another jurisdiction where the scope of practice for landscape contracting is equivalent to that allowed pursuant to the California Code of Regulations: *1 year credit toward a 6 year education and training experience requirement.*
16. Teaching in a landscape architecture degree program under the supervision of a licensed landscape architect and where the degree program consists of at least a two-year curriculum: *1 year credit toward a 6 year education and training experience requirement.*

**LANDSCAPE ARCHITECTS TECHNICAL COMMITTEE OF THE
CALIFORNIA ARCHITECTS BOARD**

Licensure Pathways

BPC section 5650 requires candidates for licensure to demonstrate six years of qualifying education and/or training experience. The Board’s evaluation of a candidate’s educational and training experience is based on the following table of experience equivalents, mirrored from CCR section 2620, Education and Training Credits.

Numbers in red indicate additional years of experience credit required to meet LATC and CLARB licensure requirements.

Experience Description	Max. Credit Allowed	Historical Background/References	Comparison with CLARB Uniform Standard
(1) Degree in landscape architecture where the degree program has been accredited by the Landscape Architectural Accreditation Board (LAAB).	4 years 2	Allowed since BLA/LATC inception	Allowed by CLARB as 6 years toward the 8-year requirement 2
(2) Degree in landscape architecture, where the degree program has not been accredited by LAAB and where the program consists of at least a four-year curriculum.	3 years 3	Allowed since BLA/LATC inception	Allowed by CLARB as 4 years toward the 8-year requirement 4
(3) Degree in architecture, where the degree program has been accredited by the National Architectural Accrediting Board (NAAB).	2 years 4	1 year allowed since BLA/LATC inception, the current CCR 2615/2620 regulatory proposal would expand to 2 years, underlying data, purpose, benefits, and rationale are outlined in Initial Statement of Reasons pages 5 and 6	Allowed by CLARB as 2 years toward the 8-year requirement 6
(4) Degree in civil engineering, where the degree program has been accredited by the Accreditation Board for Engineering and Technology (ABET).	2 years 4	New pathway within current CCR 2615/2620 regulatory proposal, underlying data, purpose, benefits, and rationale are outlined in Initial Statement of Reasons pages 6 and 7	Allowed by CLARB as 2 years toward the 8-year requirement 6

(5) Degree, where the degree program consists of at least a four-year curriculum.	1 year 5	New pathway within current CCR 2615/2620 regulatory proposal, underlying data, purpose, benefits, and rationale are outlined in Initial Statement of Reasons pages 7 and 8	Allowed by CLARB as 2 years toward the 8-year requirement 6
(6) Degree in landscape architecture, where the degree program consists of at least a two-year curriculum.	1 year 5	Allowed since BLA/LATC inception	Allowed by CLARB as 1 year toward the 8-year requirement 7
(7) Extension certificate in landscape architecture from an Extension Certificate Program that meets the requirements of section 2620.5.	2 years 4	Allowed since 1970s, inception of Extension Certificate Programs	Allowed by CLARB as 2 years toward the 8-year requirement 6
(8) Extension certificate as specified in subdivision (a)(7) and a degree which consists of at least a four-year curriculum.	4 years 2	Allowed since 1970s, inception of Extension Certificate Programs	Combination of educational experience not allowed by CLARB, CLARB would grant a maximum of 2 years for either the extension certificate OR four-year degree 6
(9) Extension certificate as specified in subdivision (a)(7) and a degree as specified in subdivision (a)(6).	3 years 3	Allowed since 1970s, inception of Extension Certificate Programs	Combination of educational experience not allowed by CLARB, CLARB would grant a maximum of 2 years for the extension certificate OR 1 year for the two-year degree 6
(10) Partial completion, as defined in subdivision (b)(1), of a degree in landscape architecture, where the degree program has been accredited by the LAAB.	1 year 5	Allowed since BLA/LATC inception	Allowed by CLARB as 1 year of experience for each year of schooling completed up to a maximum of 4 years 3-7
(11) Partial completion, as defined in subdivision (b)(1), of an extension certificate in landscape architecture from an Extension Certificate Program that meets the requirements of section 2620.5 along with a degree from an educational institution where the degree program consists of at least a four-year curriculum.	1 year 5	Allowed since 1970s, inception of Extension Certificate Programs	Allowed by CLARB as 6 months of experience for each 1 year of schooling completed up to a maximum of 2 years 6-7.5

<p>(12) Experience as, or-experience obtained under the direct supervision of, a landscape architect licensed or registered in the jurisdiction where the experience occurred.</p>	<p>1-6 years 0-5</p>	<p>4 years allowed since BLA/LATC inception, the current CCR 2615/2620 regulatory proposal would expand to 6 years to allow for a training experience-only pathway to licensure. underlying data, purpose, benefits, and rationale are outlined in Initial Statement of Reasons pages 12 and 13</p>	<p>Allowed by CLARB 0-8?</p>
<p>(13) Experience as, or experience obtained under the direct supervision of, an architect or civil engineer licensed or registered in the jurisdiction where the experience occurred.</p>	<p>up to 3 years 3-5</p>	<p>1 year allowed since BLA/LATC inception, the current CCR 2615/2620 regulatory proposal would expand to three years, underlying data, purpose, benefits, and rationale are outlined in Initial Statement of Reasons pages 13 and 14</p>	<p>Allowed by CLARB, maximum allowed credit not specified in Uniform Standard Policy: "All applicant's experience in the regulated practice of landscape architecture should be performed under the supervision of a licensed landscape architect or a licensed professional in a related field."</p>
<p>(14) Experience as a California-licensed landscape contractor or a landscape contractor licensed or registered in another jurisdiction where the scope of practice for landscape contracting is equivalent to that allowed pursuant to-section 7027.5 of the Code and section 832.27 of article 3, division 8, title 16 of the California Code of Regulations.</p>	<p>up to 4 years 3-5</p>	<p>Allowed since BLA/LATC inception</p>	<p>Allowed by CLARB, maximum allowed credit not specified in Uniform Standard Policy: "All applicant's experience in the regulated practice of landscape architecture should be performed under the supervision of a licensed landscape architect or a licensed professional in a related field."</p>

<p>(15) Experience obtained under the direct supervision of a California-licensed landscape contractor or a landscape contractor licensed or registered in another jurisdiction where the scope of practice for landscape contracting is equivalent to that allowed pursuant to section 7027.5 of the Code and section 832.27 of article 3, division 8, title 16 of the California Code of Regulations.</p>	<p>up to 1 year 5</p>	<p>New pathway within current CCR 2615/2620 regulatory proposal, underlying data, purpose, benefits, and rationale are outlined in Initial Statement of Reasons pages 15 and 16</p>	<p>Allowed by CLARB, maximum allowed credit not specified in Uniform Standard Policy: “All applicant’s experience in the regulated practice of landscape architecture should be performed under the supervision of a licensed landscape architect or a licensed professional in a related field.”</p>
<p>(16) Teaching in a landscape architecture degree program under the supervision of a licensed landscape architect and where the degree program consists of at least a two-year curriculum.</p>	<p>1 year 5</p>	<p>Regulatory action effective: January 1, 2017</p>	<p>Allowed by CLARB, maximum allowed credit not specified in Uniform Standard Policy: “All applicant’s experience in the regulated practice of landscape architecture should be performed under the supervision of a licensed landscape architect or a licensed professional in a related field.”</p>