

**Subject: Proposed Bill 158
An Act Concerning Landscape Architect Licenses**

On behalf of the many licensed Landscape Architects in Connecticut, including myself, I write to express my very strong opposition to Proposed Bill 158, An Act Concerning Landscape Architect Licenses, which is currently under consideration by the General Law Committee of the General Assembly.

The reasoning behind this legislative initiative is unclear but Senator Chapin, who is proposing it, seems very under-informed about the challenges, complexity and therefore skills required for serious professional landscape architectural work. Courteous attempts have been made to broaden his understanding of the profession, but to no avail, and he seems determined to proceed with this bill.

This bill has nothing to recommend it, and it is potentially harmful to the health, safety and welfare of Connecticut by seriously undermining the education requirements for those charged with protecting it.

The stated purpose of this bill is to change the current sound requirements for landscape architecture licensure to requiring an individual to have only a college degree and three years of experience in order to obtain a license to practice landscape architecture from the Department of Consumer Protection.

Landscape Architecture, like all similar professions such as engineering, architecture, surveying, all require the passing of rigorous examination as a prerequisite for obtaining a professional license.

At any given time currently licensed practicing landscape architects from Connecticut are designing numerous award-winning works of the highest quality and of great benefit to the public's health, safety and welfare not only in Connecticut but in other states and in some cases abroad also.

From its inception in the late 1960's and continuing to today, the current statute pertaining to Landscape architects, Section 20-370 of the Connecticut General Statutes, has required an individual wishing to become licensed as a landscape architect in Connecticut to have a degree in landscape architecture, and to have two years of professional experience, and to pass a national examination. Section 20-370, as amended, provides an exception for the Board of Landscape Architects to allow an individual who does not have the formal educational requirement but does have eight years of practical experience, under the direction of a licensed landscape architect, to take the national examination prior to being issued a license.

Note that the examination is always a vital element.

The principle of requiring education, experience and examination as the basis for licensing of all design professions is fundamental to the protection of the public whether the profession is engineering, architecture, or landscape architecture. While there may be minor nuances among licensing laws for landscape architecture, these fundamental requirements are the same for all 50 states in our country, Puerto Rico and three provinces in Canada. Consider the following:

Education. Connecticut requires a candidate for licensing to have a degree in landscape architecture from a college that is accredited by the Landscape Architecture Accreditation Board (LAAB). All states adhere to this basic requirement. As noted above, Connecticut (but not all states) may waive this requirement for those rare individuals who may not have a degree but have eight years of experience. This exception has been incorporated into Section 20-370 since its inception.

Experience. Connecticut requires a candidate to have two years of practical experience under the direction of a landscape architect. For those who may not have a college degree, the board requires eight years of experience as noted above. In contrast to many other states, the Board of Landscape Architects may consider practice under the direction of an architect or professional engineer as meeting the experience requirement pursuant to RCSA Section 20-368-8a.

Examination. The purpose of requiring an examination of all candidates is to be sure that an individual is minimally competent to practice landscape architecture without peer review so as not to jeopardize the public health, safety and welfare. Consistent with all other states, Connecticut requires that all candidates pass the national Landscape Architects Registration Examination (LARE). Similar to the examinations for engineering and architecture, the LARE is based on a professionally conducted job analysis undertaken by the Council of Landscape Architecture Registration Boards (CLARB) of which Connecticut has been an active member since 1970. The job analysis is undertaken every five to seven years to identify those elements of landscape architecture practice that need to be examined and to incorporate those elements into a universally accepted examination. The LARE is comprehensive in its scope in order to allow the successful candidate to demonstrate that his/her education and experience is sufficient to protect the public health, safety and welfare.

To rely solely on a candidate's education and experience without having a comprehensive examination would adversely affect the consumers in Connecticut. There is no way to fairly evaluate that the education received at the collegiate level covers the depth of practice of landscape architecture. Mere accreditation is not equivalent to examination. Similarly, there is no way to assure the consistency of practical experience because the practice in one professional or governmental office can vary from another office. The comprehensive LARE is the only way to evaluate the combined sufficiency of educational and professional experience of candidates for licensure.

Landscape architecture covers a huge spectrum of work, perhaps best understood by the profession's mantra of achieving a balance between the built and natural environments. It requires a multidisciplinary approach involving environmental science, art, ecology, and much more, leading to extraordinary results.

Connecticut landscape architects routinely prepare site plans, grading plans, erosion and sediment plans and detailed construction information for an enormously wide variety of spaces, both public and private. This can occur because the Board of Landscape Architects can demonstrate that these and other tasks undertaken on a routine basis in the practice of landscape architecture are fully tested by the LARE. If the examination of landscape architects is eliminated as suggested in Proposed Bill 158, landscape architects will be placed at a competitive disadvantage and will no longer be able to fairly compete for some types of work.

There is another practical problem with eliminating the examination requirement for the practice of landscape architecture. At present, because Connecticut has essentially the same education, experience and examination requirements as other states, the Connecticut licensees are able to practice in all other states by simply obtaining a license in that state under the principle of comity. Were the examination requirement to be eliminated, Connecticut's law would no longer be considered to be equivalent and the licensee would be unable to practice in other jurisdictions without taking the LARE. Simply, the Connecticut licensee who did not pass the LARE could not cross into surrounding states to practice. However, licensees from other states could practice in Connecticut because the requirements in other states would exceed those of Connecticut.

The current well-functioning, regulations do not need changing at all. Therefore I strongly urge you to do whatever you can to have the General Law Committee not to move forward with this Proposed Bill 158. In the over 45 years since the enabling legislation for licensing landscape architects was adopted by the General Assembly, no one has ever suggested that an examination is not an essential component of professional licensing. Therefore there is absolutely no justification whatsoever for altering, and therefore undermining, the current sound licensing procedure of landscape architects in Connecticut.

Thank you for your consideration of this matter.

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