

OSLAB Rulemaking on Comprehensive Rule Updates 2025

Public Comments Record

#	Date	Source	Name	Comments	Board Response
1	09/02/2025	Email	Jane Kleiner, LA1124	<p>Good day. Thank you for the opportunity to comment on the proposed amendments to the Registered Landscape Architects governance.</p> <p>I would like to submit the following comment for consideration to the board. There is no distinguishing of a sole proprietor landscape architect versus a landscape who works in a firm (therefore the firm usually supports covering these fees. It creates an inequity for LA's who have their own business to cover their annual fees + annual business fee + all of the insurances and other business costs associated with a business. Landscape architecture is one of those unique professions where there are a typically a larger number of sole proprietors (SP) vs. multi-LA firms. Yes, I have to factor in all of these costs for my business, but SPs are also not aligned to always compete against the larger firms for higher paying projects that would create more equity for covering these costs.</p> <p>I would strongly suggest that sole proprietor LAs (maybe with a certain number of years in the business, e.g. 10+ years), that can have a lower renewal rate for professional license and business license. It would help us small businesses ride the waves of available projects over the years to maintain our businesses. This is especially important when registered in multiple</p>	<p>This registrant provided a similar suggestion when the Board amended its budget and fee rules earlier in the year. The Board felt there was potential merit to the suggestion and decided to consult with legal counsel as to whether a tiered fee structure for business registration was possible. The Board was able to discuss the matter with counsel at its Nov. 2025 quarterly meeting. The Board learned that under existing statutes a tiered fee structure is not possible. The Board decided against pursuit of a statutory change given the challenges that process entails. The Board may reconsider the statutory path if in</p>

			<p>states, like WA and OR (plus other PNW/West Coast states).</p> <p>Per AMEND: 804-040-0000 RULE TITLE: Fees, the fee structure:</p> <p>RULE SUMMARY: This rule sets the Board's fee schedule. The fee schedule is set to align with the Board's operating budget for the 2025-2027 budget biennium. The fee changes proposed would remove an obsolete fee and add a new fee for a new service offered. No budgetary impact is anticipated.</p> <p>PROPOSED RULE TEXT: The following are fees established by the board: (1) Examination Fees: Landscape Architect Registration Examination (LARE): the cost for each section of the LARE is set by the Council of Landscape Architectural Boards (CLARB) and must be paid directly to CLARB. (2)</p> <ul style="list-style-type: none"> • Registration Fees: • (a) Initial Landscape Architect in Training registration: \$50.00. • (b) Annual renewal for Landscape Architect in Training: \$50.00. • (c) Application fee for initial Landscape Architect registration: \$150.00. • (d) Application fee for Landscape Architect registration by reciprocity: \$150.00. • (e) Initial Landscape Architect registration: \$375.00. • (f) Annual renewal for Landscape Architect: \$375.00. • (XX) Annual renewal for Landscape Architect sole proprietor (10+ years work experience): \$150 • (g) Inactive and Inactive Emeritus Annual fee: \$60.00. 	<p>the future there are additional statutory changes it deems necessary to pursue. However, there are never any guarantees with statutory change as approval is outside of the Board's control and rests with the Oregon Legislature and the Governor.</p>
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2	09/10/2025	Email	Lisa Goorjian Duh, LA0725	<p>Good day, First great job on the revisions! I think the intent of the proposed changes are clear and provide more general intention that provide flexibility to the registrants and Board, while aligning with current best practices.</p> <p>I do have a question regarding the amendments to CHANGES TO RULE: Continuing Education Requirements for Reactivation or Reinstatement of Registration 804-025-0015 Continuing Education Requirements: (2) PDH activities must have been completed within the two 1 year period immediately preceding the request for reactivation reinstatement of registration.¶</p> <p>My understanding is that the current rule allowed registrants whose status was inactive to be able to provide PDH from the previous 2 years (b/c my understanding was that credits are valid for 2 years) to meet the requirements for being reinstated. Will there be a one-year grace period for this new rule to take effect for current registrants with their status currently inactive for just the first year after this rule goes into effect as it will now require current inactive status registrants to provide proof of meeting the PDH completed within just one year?</p> <p>Thank you in advance for your consideration.</p>	<p>The Board considered this comment but felt the proposed change from 2 to 1 year would have little impact on registrants. First, there are not many registrants that request reinstatement from either lapsed or inactive status. Second, experience has shown that in most cases when reinstatement is requested, the registrant has completed the required PDH within a 1 year period. Third, only registrants on lapsed status ever have to complete more than the standard hours needed for 1 renewal period (12 PDH or 4 PDH if registered 25+ years) Fourth, the change addresses confusion that has existed about the 2 year window vs. the 1 year renewal period.</p>
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