



September 21, 2026

The Office of Size Standards
U.S. Small Business Administration
409 3rd Street SW
Mail Code 6530
Washington, DC 20416

**RE: Comments in Opposition to Proposed Rule on Small Business Size Standards:
Professional, Scientific and Technical Services; NAICS 541320 (Landscape Architectural
Services)**

Dear Administrator and Office of Size Standards Officials:

I am writing on behalf of the more than 16,000 members of the American Society of Landscape Architects (ASLA) to submit formal comments regarding the proposed rule of the Small Business Administration (SBA) published on August 20, 2026, concerning size standards for industry groups and industries across the United States. Specifically, I am writing to express strong opposition to the proposed revision to NAICS code 541320, Landscape Architectural Services, which would increase the small-business size standard from \$9 million to \$59 million in average annual receipts.

The proposed increase to \$59 million represents an unprecedented surge of roughly 556 percent over the current threshold. Such a dramatic expansion does not reflect the economic profile of the profession and would severely harm the genuinely small firms that form the backbone of the landscape architecture profession.

Industry economic data confirms that the proposed \$59 million threshold is profoundly disconnected from the commercial reality of landscape architecture practices:

- According to the ASLA *Landscape Architecture Industry Report 2024*,¹ the median annual gross revenue for landscape architecture firms is just \$570,000, and the mean annual revenue stands at \$2.2 million.
- Roughly 65 percent of all landscape architecture firms generate less than \$1 million in annual gross revenue.²

¹ American Society of Landscape Architects (2025, March) *Landscape Architecture Industry Report 2024*. <https://www.asla.org/resources/practitioners/industry-report-2024>

² American Society of Landscape Architects (2025, March) *Landscape Architecture Industry Report 2024*. <https://www.asla.org/resources/practitioners/industry-report-2024>



- Data from the U.S. Census Bureau’s *Statistics of U.S. Businesses* (2022 data, published in 2025) demonstrates that the average annual revenue per landscape architecture firm is approximately \$1.15 million.³

Categorizing firms with tens of millions of dollars in annual revenue as “small businesses” distorts the intent of federal small-business statutory protections. If this proposed rule is adopted, genuine small businesses that currently operate well under the \$9 million ceiling will be forced to compete directly against large, well-capitalized firms generating between \$10 million and \$59 million annually. Firms of that scale possess dedicated business development departments, substantial bonding capacity, and marketing resources that far exceed traditional small practices. As a consequence, true small landscape architecture firms will see their access to federal small-business prime contracts, small-business set-asides, sole-source procurements, SBA loan programs, and targeted mentoring resources severely diluted or eliminated altogether.

Federal size standards should foster fair and equitable opportunities for our nation’s small businesses, including small landscape architecture firms. I urge the SBA to withdraw the proposed \$59 million threshold for NAICS 541320-Landscape Architecture and maintain the current \$9 million standard, which better aligns with empirical industry revenue realities. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, reading "Torey Carter-Conneen". The signature is fluid and cursive, with a long, sweeping underline.

Torey Carter-Conneen, Hon. ASLA
Chief Executive Officer
American Society of Landscape Architects

³ United States Census Bureau (2025, April) *2022 SUSB Annual Data Tables by Establishment Industry*. <https://www.census.gov/data/tables/2022/econ/susb/2022-susb-annual.html>