ASLA Testimony on the Water Resources Development Act of 2024

Sediment has been used to build marsh islands between mainland New Jersey and beach resorts, such as Mordecai Island in Barnegat Bay. Photo courtesy *U.S. Army Corps of Engineers.*

American Society of Landscape Architects

Testimony on behalf of

The American Society of Landscape Architects

Before the U.S. House of Representatives

Committee on Transportation and Infrastructure

Subcommittee on Water Resources and Environment

Hearing Entitled: "Proposals for a Water Resources Development Act of 2024: Stakeholder Priorities"

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Introduction

Thank you Chairman Rouzer, Ranking Member Napolitano, and Members of the House Subcommittee on Water Resources and Environment for the opportunity to provide written testimony on the Water Resources Development Act (WRDA) and the valuable work the U.S Army Corps of Engineers (USACE) performs to improve our nation's navigable channels, reduce flood and storm damage, restore aquatic ecosystems, and more. The American Society of Landscape Architects (ASLA) applauds your leadership in ensuring a biennial WRDA process to plan, design, and implement USACE projects and studies to meet our nation's water resources needs.

ASLA appreciates USACE's collaboration with landscape architects to improve and safeguard our nation's water infrastructure, while also addressing water quality and quantity issues, climate resilience, biodiversity, public health, and equitable economic development.

Founded in 1899, ASLA is the professional association for landscape architects in the United States, representing more than 15,000 members. ASLA members span nationwide, with landscape architects representing all 50 states and U.S. territories among ASLA's 49 chapters. ASLA promotes the profession of landscape architecture and advances the practice through advocacy, education, communication, and fellowship.

Landscape architecture encompasses the analysis, planning, design, management, and stewardship of the natural and built environment through science and design. The profession is broad in scale and scope, with most practitioners focusing on designing water and stormwater management infrastructure projects, multimodal transportation networks, community master plans, and parks and recreation spaces.

Landscape architects often play a lead role in large public and private projects that significantly impact public health, safety, and welfare.[1] The technical complexity of landscape architecture and its impact on public health, safety, and welfare have led all 50 states and the District of Columbia to license landscape architects. In addition to meeting STEM education and experience requirements, candidates for landscape architecture licensure pass a national registration exam—the Landscape Architecture Registration Exam (LARE)—before they can be licensed by the state boards of registration. This rigorous four-part exam includes a section on Grading, Drainage, and Stormwater Management, requiring candidates to demonstrate mastery of grading and earthwork design considerations for small-to-large scale sites and detailed site-specific circulation, including addressing design alternatives, adherence to national codes, and more.

Landscape Architects Successfully Collaborate with the U.S. Army Corps of Engineers

As you are aware, Congress first enacted WRDA in 1974 to provide policy and guidance to help strengthen our nation's water infrastructure. The 1986 WRDA began to identify and authorize funding for specific USACE civil works projects. Since its inception, WRDA has been updated to allow USACE to move beyond constructing water infrastructure projects that only address traditional irrigation, navigation, and flood control issues. Today, USACE projects also focus on numerous community concerns, including environmental protection, climate change adaptation and mitigation efforts, biodiversity, recreation[2] economic development, and other community benefits.

Throughout the years, landscape architects have been collaborative partners with USACE. The profession's STEM-focused education and training with an emphasis in hydrology, geology, botany

[1] Schatz, Alex P., JD, and Josh Sundloff JD, ASLA. "LANDSCAPE ARCHITECTURE LICENSURE HANDBOOK: Ensuring Safe, Healthy, and Resilient Natural and Built Environments," January 2017. https://www.asla.org/uploadedFiles/CMS/Government_Affairs/LA_Licensure_Handbook.pdf.
[2] "Tom Hanafan River's Edge Park," Sasaki, n.d., https://www.sasaki.com/projects/tom-hanafan-rivers-edge-park/.

and horticulture, engineering site design, water management, drainage, and climatology[3] has positioned landscape architects to be uniquely qualified to collaborate on and lead USACE projects. From coastal resilience to wetlands restoration, flood control, sea-level rise, and more, landscape architects work with USACE to create and manage our nation's critical water infrastructure. During USACE's Engineering With Nature® (EWN®) Podcast, Dr. Jeff King, deputy national lead of the EWN program, discussed how landscape architects have joined forces with USACE to explore innovative solutions to coastal resilience.[4]

Recently, landscape architects, firms, and university programs have contracted and collaborated with USACE on cutting-edge projects and research to help manage our nation's water infrastructure:

- Landscape architecture faculty at the University of Virginia are collaborating with USACE to study several sites in the Chesapeake Bay to find ways of stopping or mitigating the damage from changing environments and ecosystems. The research team will help develop methods of evaluating the performance of nature-based efforts, tracking characteristics such as vegetation growth patterns, indicator species, and plant health.[5]

- USACE contracted with Biohabitats, a landscape architecture and design-build firm in Baltimore, Maryland, to provide ecosystem restoration and environmental services to support the Great Lakes Restoration Initiative (GLRI) within the Buffalo, Detroit, and Chicago Districts. Launched in 2010, the GLRI was designed to accelerate efforts to protect and restore the health of the Great Lakes, the largest system of fresh surface water in the world. The GLRI supported projects to restore habitat and wetlands, clean up toxic pollution, combat invasive species, and prevent runoff from farms and cities.[6]

- CMG Landscape Architecture worked with the Port of San Francisco and USACE to develop the San Francisco Draft Waterfront Adaptation Strategies, which will identify a preferred approach to reduce flood risks from sea level rise and extreme storms and to guide the transformation of the city's shoreline and bayside neighborhoods.[7]

- Landscape architecture faculty at Auburn University implemented a project—funded in part by USACE—to help improve the design, function, and efficacy of coastal infrastructure like levees, jetties, and dams.[8]

These are just a few examples of the myriad projects that highlight the unique role landscape architects play in collaborating with USACE.

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[3] American Society of Landscape Architects. "Landscape Architecture Is a STEM Discipline," 2023. https://www.asla.org/uploadedFiles/2022_ASLA_STEM_White_Paper.pdf.
[4] U.S. Army Corps of Engineers Headquarters, "Expanding the Practice of EWN through Landscape Architecture," n.d., https://www.usace.army.mil/Media/News/NewsSearch/Article/2584446/expanding-the-practice-of-ewn-through-landscape-architecture/.
[5] "UVA Landscape Architects Seek to Fight Flooding the Natural Way," *UVA Today*, December 6, 2023, https://news.virginia.edu/content/uva-landscape-architects-seek-fight-flooding-natural-way.
[6] Younts Design Inc, "Biohabitats » Indefinite Delivery Contract to Provide Ecosystem Restoration and Environmental Services to Support the Great Lakes Restoration Initiative within the Buffalo, Detroit and Chicago Districts," n.d., https://www.biohabitats.com/project/indefinite-delivery-contract-to-provide-ecosystem-restoration-and-environmental-services-to-support-the-great-lakes-restoration-initiative-within-the-buffalo-detroit-and-chicago-districts/.
[7] CMG Landscape Architecture, "San Francisco Draft Waterfront Adaptation Strategies - CMG Landscape Architecture," February 3, 2023, https://www.cmgsite.com/places/san-francisco-draft-waterfront-adaptation-strategies/.
[8] American Society of Landscape Architects. "Landscape Architecture Is a STEM Discipline," 2023. https://www.asla.org/uploadedFiles/2022_ASLA_STEM_White_Paper.pdf.

ASLA Recommendations for the Water Resources Development Act of 2024

1. The U.S. Army Corps of Engineers should enhance the use of nature-based solutions in its water resources projects.

Nature-based solutions are infrastructure that uses, restores, or emulates natural ecological processes and can be created by human design, engineering, and construction to act in concert with natural processes.[9] Examples of nature-based solutions include living shorelines, green roofs, tree canopies, rain gardens, bioswales, retention basins, and permeable and pervious pavements.[10] A USACE-sponsored report highlighted that nature-based solutions[11] may incorporate natural landscapes such as beaches, dunes, wetlands, reefs, and islands.[12] Nature-based solutions can provide sustainable, cost-effective, and resilient alternatives or complements to traditional gray infrastructure, which typically includes structures like buried pipes, sewers, and tunnels made of concrete or steel.

Traditionally, USACE and other infrastructure builders have looked solely to gray infrastructure to create our nation's water infrastructure projects. Generally, buried pipes, pump systems, sewers, and tunnels have successfully rerouted waters to manage stormwater, prevent flooding, address sea-level rise, and more. However, water infrastructure projects that incorporate nature-based solutions are known to be highly effective at managing water and simultaneously create multiple community-wide benefits that impact environmental, human, and economic health.[13]

Water infrastructure projects that incorporate vegetation or organic material such as seagrasses, mangrove forests, and floating ecosystems can also help to mitigate climate impacts and poor air quality through carbon storage and sequestration. Additionally, these projects can create or restore habitats and ecosystems that conserve and increase biodiversity while also improving community aesthetics.

Nature-based solutions also improve human physical and mental health. Green spaces provide environments for physical activity, which helps prevent cardiovascular diseases, diabetes, and other chronic diseases. Nature-based solutions also improve air quality, which in turn may help prevent asthma and other lung conditions. These green spaces have also been shown to help reduce stress and address mental health issues.

Communities may also reap economic benefits from recreational and tourist-focused water projects that utilize nature-based solutions, such as parks, managed shorelines, beaches, and more. Overall economic growth can increase through jobs, tourism, and recreation opportunities such as wildlife viewing, sportfishing, fishing, swimming, beach-going, and boating.[14] The use of nature-based solutions in USACE's Missouri River Recover Program—which used levee setbacks to reconnect

[9] In recognition that the term natural infrastructure is related to nature-based solutions as used or agreed to by the U.S. government as found in Public Law 117-58, Section 11103 (Nov. 15, 2021) (codified at 23 U.S.C. 101(a)(17)); https://www.govinfo.gov/content/pkg/PLAW-117publ58/pdf/PLAW-117publ58.pdf.
[10] White House. Olander, Lydia, Krystal Laymon, and Heather Tallis. "Opportunities for Accelerating Nature-Based Solutions: A Roadmap for Climate Progress, Thriving Nature, Equity, and Prosperity," November 2022. https://www.whitehouse.gov/wp-content/uploads/2022/11/Nature-Based-Solutions-Roadmap.pdf.
[11] In recognition that the U.S. Army Corps of Engineers utilizes the terms natural and nature-based features to describe nature-based solutions as found in Todd S. Bridges et al., "International Guidelines on Natural and Nature-Based Features for Flood Risk Management," September 15, 2021, https://doi.org/10.21079/11681/41946.
[12] Todd S. Bridges et al., "International Guidelines on Natural and Nature-Based Features for Flood Risk Management," September 15, 2021, https://doi.org/10.21079/11681/41946.
[13] White House. Olander, Lydia, Krystal Laymon, and Heather Tallis. "Opportunities for Accelerating Nature-Based Solutions: A Roadmap for Climate Progress, Thriving Nature, Equity, and Prosperity," November 2022. https://www.whitehouse.gov/wp-content/uploads/2022/11/Nature-Based-Solutions-Roadmap.pdf.
[14] Todd S. Bridges et al., "International Guidelines on Natural and Nature-Based Features for Flood Risk Management," September 15, 2021, https://doi.org/10.21079/11681/41946.

floodplains—provided co-benefits including ecosystem sustainability, increased recreational opportunities, improved aesthetics, and enhanced cultural and educational opportunities.[15]

Acknowledging the benefits of nature-based solutions in water projects, USACE introduced its EWN initiative in 2010 to highlight current and future capabilities for delivering nature-based solutions.[16] EWN is the intentional alignment of natural and engineering processes to efficiently and sustainably deliver economic, environmental, and social benefits through collaboration.[17] Since its inception, EWN has been successfully implemented to guide the planning, design, and construction of numerous USACE projects.[18] The Oyster Reef Shoreline Stabilization Project at MacDill Air Force Base is one example of EWN's success and shows the need for increased nature-based solutions. In this project, a living shoreline made of oyster reefs was constructed to restore natural coastal vegetation, reduce wave energy, and encourage sediment accumulation that stabilized the shoreline, protected it from erosion, improved water quality, and enhanced habitat for wildlife.[19]

Further, due to mounting evidence demonstrating the effectiveness of nature-based solutions and the numerous co-benefits, the Biden administration introduced its *Nature-Based Solutions Roadmap* in November 2022, calling on federal agencies to prioritize these techniques in confronting our nation's most pressing challenges.[20]

Given the documented effectiveness of nature-based solutions, the ongoing success of EWN, and the administration's *Roadmap* recommendations, ASLA believes that WRDA 2024 is a unique opportunity to call on USACE to expand its use of nature-based solutions. Specifically, ASLA recommends that all new studies on the feasibility of USACE projects include consideration of nature-based solution alternatives or compliments. Further, Congress and USACE should prioritize the authorization and funding of projects beyond the feasibility phase that have successfully planned and designed for the implementation of nature-based solutions.

2. The U.S. Army Corps of Engineers should work to include more landscape architects in its water resources projects.

During a December 5, 2023, hearing before the House Water Resources and Environment Subcommittee, the Honorable Michael L. Connor, Assistant Secretary of the Army for Civil Works at the United States Department of the Army stated, there is a "need to have the next generation of skilled laborers in place" to handle projects concerning flood control and mitigation and coastal resilience.[21] Because of landscape architects' long-standing expertise in planning and designing resilient water projects, ASLA urges Congress and USACE to take steps to utilize more of the profession for the successful delivery of these projects.

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[15] Todd S. Bridges et al., "International Guidelines on Natural and Nature-Based Features for Flood Risk Management," September 15, 2021, https://doi.org/10.21079/11681/41946.
[16] Todd S. Bridges et al., "Engineering With Nature® : Supporting Mission Resilience and Infrastructure Value at Department of Defense Installations," October 5, 2021, https://doi.org/10.21079/11681/42207.
[17] Engineering With Nature, "About EWN - Engineering with Nature," July 25, 2023, https://ewn.erdc.dren.mil/about/.
[18] Engineering With Nature, "Built Projects - Engineering with Nature," March 29, 2023, https://ewn.erdc.dren.mil/built-projects/.
[19] Todd S. Bridges et al., "Engineering With Nature® : Supporting Mission Resilience and Infrastructure Value at Department of Defense Installations," October 5, 2021, https://doi.org/10.21079/11681/42207.
[20] White House. Olander, Lydia, Krystal Laymon, and Heather Tallis. "Opportunities for Accelerating Nature-Based Solutions: A Roadmap for Climate Progress, Thriving Nature, Equity, and Prosperity," November 2022. https://www.whitehouse.gov/wp-content/uploads/2022/11/Nature-Based-Solutions-Roadmap.pdf.
[21] "Hearing | Water Resources Development Acts: Status of Past Provisions and Future Needs," House Transportation and Infrastructure Committee, December 5, 2023, https://transportation.house.gov/calendar/eventsingle.aspx?EventID=406974.

Since at least 1857, landscape architects have been designing with nature.[22] Using plant and soil systems, wetlands, tree canopies, green and open spaces, and more, landscape architects harness the power of nature to manage stormwater, mitigate flooding, prevent coastal erosion, clean our waterways, and address other water resource needs. These and other nature-based solutions may be implemented at many scales, from individual residences, to a neighborhood, to a community, and to an entire region.

Landscape architects are particularly astute at addressing water-related issues on a watershed scale, instead of "one off" project-specific solutions. Landscape architects deploy holistic nature-based solutions like upstream wetlands and forest restoration to manage downstream flooding and erosion, as opposed to or in concert with gray infrastructure flood walls, dikes, river channel modifications, and others. Since water is by nature a dynamic force, failure to holistically consider the constant flow and cycle of water between individual project sites leaves communities increasingly susceptible to floods, droughts, and polluted bodies of water.[23]

Further, landscape architects are leaders in community engagement processes that help build support for the project and lead to designs that meet the needs of diverse groups of residents and stakeholders. Conventional "check-the-box" models of engagement often fail to reach and build trust with individuals in the community, especially those who are underserved and often overlooked in design or policy considerations.[24] In contrast, landscape architects account for the human experience when designing public projects and implement innovative forms of public engagement that are "contextual, open, experiential, substantive, and holistic."[25] Elevating community voices is critical because lives are directly affected by projects.[26]

The design of WRDA projects must begin to utilize a comprehensive approach that values the interconnectedness of water systems, communities, and infrastructure. As such, landscape architects with their holistic design approach and unique community engagement skills are much needed on USACE projects.

The U.S. Army Corps of Engineers should recruit and hire additional landscape architects to meet the growing demands of designing and constructing water resources projects.

As you know, Section 8116. Workforce Planning of WRDA 2022[27] called for the recruitment of individuals for careers at USACE. The section further allows USACE to enter into partnerships with colleges and universities, including historically Black colleges and universities (HBCUs), to help with recruiting efforts.
Given the holistic design skills, community engagement techniques, and expertise in utilizing nature-based solutions for water resources projects, ASLA encourages USACE to take aggressive steps to recruit and hire landscape architects. ASLA has learned from its members that, while some USACE district offices have multiple landscape architects on staff, most district offices have few or

[22] "Frederick Law Olmsted," Architect of the Capitol, n.d., https://www.aoc.gov/explore-capitol-campus/frederick-law-olmsted#:~:text=Olmsted%20retired%20in%201895.,scenic%20reservations%20and%20university%20campuses.
[23] "Jackson, Mississippi Water Crisis," Center for Disaster Philanthropy, February 15, 2023, https://disasterphilanthropy.org/disasters/jackson-mississippi-water-crisis/.
[24] Siler, Emily, Major Professor, and Jessica Canfield. 2023. "Engaging Communities: A Primer for Landscape Architecture Practice." https://krex.k-state.edu/bitstream/handle/2097/43308/EmilySiler2023.pdf?sequence=1.
[25] "Design as Democracy: Techniques for Collective Creativity: De La Pena, David, Jones Allen, Diane, Hester Jr., Randolph T., Hou, Jeffrey, Lawson, Laura J., McNally, Marcia J.: 9781610918473: Amazon.Com: Books," n.d., https://www.amazon.com/gp/product/1610918479/ref=as_li_qf_asin_il_tl?ie=UTF8&tag=desiforthefut-20&creative=9325&linkCode=as2&creativeASIN=1610918479&linkId=3c0ccf42772bdcf0a92963b1ecf01a3a&asin=1610918479&revisionId=&format=4&depth=1.
[26] "New York Rising Community Planning." SCAPE, May 16, 2019. https://www.scapestudio.com/projects/new-york-rising-community-planning/.
[27] Public Law 117-263, Section 8116 (Dec. 23, 2022). https://www.congress.gov/117/plaws/publ263/PLAW-117publ263.pdf.

no landscape architects, resulting in inconsistent processes, approaches, and efficiencies in project delivery. Congress should provide sufficient appropriations and other resources to allow USACE to increase the number of landscape architects in its workforce, thereby ensuring well-designed projects that manage water resources and meet the concerns of the hosting community.

Further, ASLA strongly encourages USACE to partner with the 102 landscape architecture programs at 76 universities and colleges across the country, including the HBCUs North Carolina Agricultural and Technical State University and Morgan State University, to help develop, recruit, and hire landscape architects to work with the agency. Landscape architecture students are educated in and routinely apply the physical and natural sciences, including site design, land planning, grading, drainage, stormwater management, hydrology, erosion control, and more,[28] making them uniquely qualified to immediately contribute to the success of USACE.

The U.S. Army Corps of Engineers should incorporate landscape architecture in calls for Indefinite Delivery, Indefinite Quantity (IDIQ) contracts.

The Federal Acquisition Regulation (FAR) is the primary regulation used by all executive agencies to acquire supplies and services.[29] Governed by the FAR, Indefinite Delivery, Indefinite Quantity (IDIQ) contracts—most often used for architect-engineering services—are used when the exact quantities of supplies or services the government will require during the contract period cannot be determined at the time of contract award.[30]

ASLA has heard from its members that many USACE IDIQ solicitations do not always include a specific call for landscape architects when the requested services fall squarely within the scope of work for the profession. During the solicitation process, USACE should explicitly include landscape architects alongside other qualified professions, when appropriate. Because the federal government must select architectural and engineering services based on competence and qualifications rather than on price,[31] it is imperative that landscape architects be included in IDIQ solicitations that involve the planning, design, and management of land. This will ensure that the most qualified professionals and firms may compete for contracting opportunities to work on USACE water resource projects.

Congress should take action to ensure landscape architects' involvement in USACE projects impacting land management.

To further incorporate more landscape architects in water resource projects, ASLA urges Congress to call on the executive branch to amend the FAR to include landscape architects' involvement in USACE water resource projects. While Congress typically does not take action to amend the FAR, the body can enact or amend legislation to prompt the executive branch to amend the FAR.[32]

The Department of Defense (DoD) Unified Facilities Criteria (UFC) provides documentation for the planning, design, construction, sustainment, restoration, and modernization of the Military

[28] American Society of Landscape Architects. "Landscape Architecture Is a STEM Discipline," 2023. https://www.asla.org/uploadedFiles/2022_ASLA_STEM_White_Paper.pdf.
[29] "Federal Acquisition Regulation," GSA, October 16, 2023, https://www.gsa.gov/policy-regulations/regulations/federal-acquisition-regulation-far#:~:text=The%20Federal%20Acquisition%20Regulation%20(FAR,and%20services%20with%20appropriated%20funds.
[30] "Indefinite Delivery, Indefinite Quantity Contracts," GSA, November 9, 2020, https://www.gsa.gov/small-business/register-your-business/explore-business-models/indefinite-delivery-indefinite-quantity-idiq.
[31] "40 USC Ch. 11: SELECTION OF ARCHITECTS AND ENGINEERS," n.d., https://uscode.house.gov/view.xhtml?path=/prelim@title40/subtitle1/chapter11&edition=prelim.
[32] Congressional Research Service. Kate M. Manuel et al., "The Federal Acquisition Regulation (FAR): Answers to Frequently Asked Questions," November 16, 2012, https://www.secnav.navy.mil/rda/Documents/FARfaq.pdf.

Departments, Defense Agencies, and DoD Field Activities.[33] The FAR governs DoD UFC 3-201-02, which establishes minimum landscape architectural requirements and best practices to promote consistent landscape architectural quality for all DoD facilities and specifically states: "All DoD military construction (MILCON) projects with site improvement costs over $250,000, must include a landscape plan with supporting details and specifications prepared by a registered professional (Architect, Engineer, or Landscape Architect) as required by the Federal Acquisition Regulations (FAR) (Subpart 2.1).[34]

Similar requirements for registered professionals such as landscape architects in USACE civil works projects do not appear to exist. ASLA therefore recommends WRDA 2024 include a request to the administration to incorporate the following language in the FAR: "All USACE projects with site improvements must include a landscape plan with supporting details and specifications prepared by a registered professional (Architect, Engineer, or Landscape Architect)." A FAR amendment can integrate DoD UFC 3-201-02 into the WRDA framework for USACE civil works projects to enhance coordination, efficiency, and more for federal water infrastructure projects.

3. The U.S. Army Corps of Engineers should work to expand opportunities for small businesses to work on its water resources projects.

Throughout the years, landscape architects have successfully collaborated with USACE through employment at USACE, but more often through contracting and subcontracting opportunities with the agency. However, due to their smaller size, many landscape architecture firms often lack the tools, resources, and opportunities of large firms that are needed to compete for and assist with large-scale USACE projects. Historically, federal mentorship programs have proven successful in assisting small businesses to become competitive federal contractors, which, in turn, helps small businesses create and retain jobs.[35]

The U.S. Small Business Administration's (SBA) Mentor-Protege Program (MPP) helps eligible small businesses (protégés) gain capacity and win government contracts through partnerships with more experienced companies (mentors).[36,37] Specific program initiatives help protégés receive guidance on manufacturing and strategic planning, financial assistance, and navigation of the federal procurement process—one of the most significant hurdles small landscape architecture firms experience.[38] In fiscal year 2022, SBA's MPP had 1,426 active agreements creating successful partnerships with large companies and small businesses across the procurement spectrum.

Currently, USACE utilizes SBA's MPP Program to pair large companies with smaller firms, including some small landscape architecture firms. These pairings are designed to help streamline and increase the participation of small businesses working with the USACE. This capacity-building initiative helps protégé firms develop the necessary expertise and learn about resources to successfully compete for USACE contracts, which can lead to increased innovation and economic growth.

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[33] "Unified Facilities Criteria (UFC) | WBDG - Whole Building Design Guide," n.d., https://www.wbdg.org/ffc/dod/unified-facilities-criteria-ufc.
[34] "UFC 3-201-02 Landscape Architecture, with Change 1 | WBDG - Whole Building Design Guide," n.d., https://www.wbdg.org/ffc/dod/unified-facilities-criteria-ufc/ufc-3-201-02.
[35] Congressional Research Service. "Small Business Mentor-Protégé Programs," June 10, 2022. https://crsreports.congress.gov/product/pdf/R/R41722.
[36] "SBA Mentor-Protégé Program," U.S. Small Business Administration, n.d., https://www.sba.gov/federal-contracting/contracting-assistance-programs/sba-mentor-protege-program.
[37] Hagedorn, Mark. "Consolidation of Mentor-Protégé Programs and Other Government Contracting Amendments." Federal Register, October 16, 2020. https://www.federalregister.gov/documents/2020/10/16/2020-19428/consolidation-of-mentor-protg-programs-and-other-government-contracting-amendments.
[38] "SBA Mentor-Protégé Program," U.S. Small Business Administration, n.d., https://www.sba.gov/federal-contracting/contracting-assistance-programs/sba-mentor-protege-program.

ASLA urges the U.S. Army Corps of Engineers to enhance its efforts in promoting the U.S. Small Business Administration's Mentor-Protégé Program, particularly with small landscape architecture firms. Small landscape architecture firms have a proven track record of providing critical design, restoration, and public engagement services to USACE projects. Efforts to increase the profession's participation in contracting opportunities benefit all parties and the nation as a whole.

4. The U.S. Army Corps of Engineers should adopt The Sustainable SITES Initiative® (SITES®) *to enhance its workforce and to help guide and certify its water resources projects.*

SITES is a nationally recognized set of comprehensive, voluntary guidelines together with a rating system that assesses the sustainable design, construction, and maintenance of landscapes and other outdoor spaces. It is used by landscape architects, designers, engineers, architects, developers, policymakers, and others to guide land design and development. The SITES Rating System is produced by Green Business Certification Inc., which owns exclusive rights to the SITES Rating System, its publications, and trademarks. The material on which the SITES Rating System is based was developed through a collaborative, interdisciplinary effort of the American Society of Landscape Architects Fund, The Lady Bird Johnson Wildflower Center at The University of Texas at Austin, and the United States Botanic Garden.

SITES projects include government facilities, university campuses, public parks, commercial buildings, hotels, mixed-use developments, military campuses, and more. As of fall 2023, more than 330 projects are participating in the SITES program, covering 1.28 billion square feet of landscapes and outdoor spaces that span 22 countries and 41 U.S. states and the District of Columbia. SITES-certified projects lead to high-performing landscapes that mitigate flooding, drought and heat, reduce stormwater runoff, and improve water quality while also providing other community-wide benefits.

In 2015, the General Services Administration (GSA) —the federal agency responsible for managing and supporting the basic functioning of federal agencies, property, and contract options—adopted SITES. The GSA's adoption of SITES is included in GSA's *Facilities Standards for the Public Buildings Service* (P-100) document, which establishes design standards and criteria for new buildings, site improvements, infrastructural projects, major and minor alterations, and work in historic structures for the Public Buildings Service (PBS) of the General Services Administration.[39] "The GSA determined that the incorporation of SITES offers a highly effective and efficient way to compel environmental performance and project efficiencies, including effective cost control, on various capital project types."[40]

Landscape architects led GSA's SITES pilot project at the Peter V. Domenici U.S. Courthouse in Albuquerque, New Mexico. The site's 4.4-acre revitalization addressed irrigation issues affecting parking by switching to native plants that improved water management, decreased energy use, increased urban habitat, and enhanced community culture.[41] GSA also achieved SITES certification for the new Federal Office Building in Miramar, Florida.[42] The 20-acre project houses a federal building campus, which minimizes impacts and maximizes harmonization with the adjacent conservation areas and nearby Florida Everglades. Recently, landscape architects utilized SITES to help plan and design GSA's Columbus Land Port of Entry—a 28.65-acre expansion project in Columbus, New Mexico's Chihuahuan Desert Grassland. Landscape architects redesigned the original site to accommodate increased vehicle and pedestrian traffic and

[39] "Facilities Standards (P100) Overview," GSA, September 18, 2023, https://www.gsa.gov/real-estate/design-and-construction/engineering/facilities-standards-for-the-public-buildings-service.
[40] "SITES Certification," U.S. General Services Administration, April 6, 2022, https://www.gsa.gov/real-estate/design-and-construction/landscape-architecture/sites-certification.
[41] "SITES | Developing Sustainable Landscapes," n.d. https://sustainablesites.org/pete-v-domenici-us-courthouse-sustainable-landscape-renovation.
[42] "SITES | Developing Sustainable Landscapes," n.d. https://sustainablesites.org/us-federal-office-building.

decrease stormwater runoff from roofs and pavement using native plants.[43] A recipient of the 2022 GSA Design Awards for landscape architecture and architecture, the Columbus Land Port of Entry was praised for its sustainability and melding high functionality with regional culture and resource stewardship.[44]

ASLA believes that SITES guidelines are complementary to and align with USACE's EWN program. Moreover, the SITES rating system would allow USACE to showcase its commitment to sustainable infrastructure practices and to systematically document projects' performance, both of which could be beneficial in working with policymakers to demonstrate cost-benefit and rate-of-return analyses.

Further, ASLA urges USACE employees to consider becoming a SITES Accredited Professional (SITES AP). Similar to how a LEED credential denotes proficiency in sustainable design, construction, and operations standards for buildings, SITES AP provides professionals with the opportunity to increase and demonstrate their knowledge, expertise, and commitment to sustainable land development. The SITES AP credential applies to landscape architects, architects, engineers, sustainability consultants, planners, ecologists, urban designers, and others interested in nature-based solutions, optimizing ecosystem services, and ensuring outcomes of a development project are sustainable, resilient, and regenerative.[45]

Given the success of SITES in general and at the U.S. General Services Administration, the U.S. Army Corps of Engineers could easily adopt SITES guidelines and certification for its water resources projects.

Conclusion

Thank you again for the opportunity to provide written testimony on the reauthorization of WRDA and the valuable work the USACE. ASLA looks forward to working with Congress to implement these recommendations that enable landscape architects to continue to plan and design our nation's water resources projects.

If you have any questions or would like to follow up on this legislative matter, please contact me or ASLA Director of Federal Government Affairs, Roxanne Blackwell, at rblackwell@asla.org or (202) 216-2334.

Sincerely,

Torey Carter-Conneen
Chief Executive Officer

[43] "SITES | Developing Sustainable Landscapes," n.d. https://www.sustainablesites.org/columbus-us-land-port-entry-expansion.
[44] GSA Design Awards 2022 (pg. 34). https://www.gsa.gov/system/files/2022_GSA_Design_Awards_Book_final_508.pdf.
[45] "SITES | Developing Sustainable Landscapes," n.d., https://sustainablesites.org/professionals.