



NEVADA ASSOCIATION OF LAND SURVEYORS

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November 12, 2025

Office of Nevada Boards, Commissions, and Councils Standards
Department of Business and Industry
1830 College Parkway, Suite 100
Carson City, NV 89706

RE: Comments on Proposed Regulation – LCB File No. R074-25

Dear Director:

On behalf of the Nevada Association of Land Surveyors (NALS), we appreciate the opportunity to provide comments regarding the Proposed Regulation of the Department of Business and Industry Office of Nevada Boards, Commissions, and Councils Standards (Office) (LCB File No. R074-25).

NALS recognizes and supports the intent of this regulation to promote transparency, accountability, and consistent practices among Nevada's occupational licensing boards. However, we wish to express several concerns regarding the potential administrative, operational, and governance impacts on the Nevada Board of Professional Engineers and Land Surveyors (NVBPELS) and other Boards and Commissions.

Increased Administrative and Reporting Burden

The proposed regulation requires quarterly reporting on complaints, licensing data, financial summaries, and legislative tracking. These duplicative reporting requirements would significantly increase administrative workload and divert staff resources from essential regulatory and enforcement functions. NVBPELS already fulfills reporting obligations under NRS 622.

Reduction of Board Autonomy

While the regulation acknowledges each Board's fiscal independence, it grants the Office broad authority to issue corrective actions, require documentation of investigations, and recommend member removal. This undermines the independent, profession-driven governance structure that ensures public protection through technical expertise rather than political oversight.

Overreach of Centralized Control

The level of oversight proposed, particularly the ability to require additional data submissions and impose corrective timelines, appears to exceed the legislative intent of NRS 232.8415. For a specialized, self-funded Board such as NVBPELS, this could result in operational delays and the erosion of professional self-regulation.

Financial and IT Impacts

The required expansion of reporting will likely necessitate new software systems, staffing, and IT additions. These expenses could require an increase in licensee fees which would be an outcome contrary to efficient government operation.

NVBPELS has consistently demonstrated responsible self-governance, efficient operations, and strong public protection. We strongly believe that consistency and transparency can be achieved without compromising the independence or effectiveness of Nevada's professional licensing boards.

NALS opposes the proposed regulation – LCB File No. R074-25 and we respectfully urge the Office to, at minimum, consider revising the regulation to clarify limits of oversight and engage stakeholders in collaborative development of reporting standards.

Thank you for your commitment to responsible governance and public protection.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Nick Ariotti", is written over a light gray rectangular background.

Nick Ariotti, PLS
President