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To: Wetlanders
From: Richard F. Plachy

re: One Certification Program or Two?

In thinking about setting up a certification program, or indeed in doing wetland delineation at all, it would seem that there is a significant problem. That is, it is against current Maine law. The three pillars on which delineation is based would seem to require a delineator to practice pedology (illegal unless you are a registered Soil Scientist) and to make and report hydrogeological determinations (this may also be illegal unless you are also a registered Geologist). Finally, it is pretty useless without accurate maps, the preparation of which would seem to involve surveying without a license.

Oddly enough, this conflict does not occur in the much larger field of wetland science in general. One may classify plants and animals and study them, make habitat and species diversity determinations, study wetland "banking" and habitat equivalences, study the wetland ecology as a whole, study the impact of various activities on various types of wetlands, and so on and on. It is only in wetland delineation that the conflict occurs.

It struck me that this is very similar to the situation with designing septic systems in Maine. This too is a very narrow discipline that nonetheless involves pedology, geology, engineering, and surveying. To avoid a problem, the legislature (with much guidance) set up a new narrowly defined profession and exempted that profession from the strictures forbidding working in these other areas without appropriate certification. Such work was only exempted when it was necessary in designing or preparing to design septic systems.

Wetland delineation is a similar narrow specialty that again is "neither fish nor fowl". It would seem to me that a certification program should be set up for this narrow specialty alone. A second program could be set up to certify scientists as Wetland Scientists, but this would not need the same "special dispensation" from the legislature. In order for wetland delineators to be properly certified (with the present definition of wetlands), it is necessary to either get such legislation passed, or for each practitioner to also become a registered Soil Scientist and perhaps as a Geologist. Depending on the mapping accuracy required, it could also be argued that you would need cross-licensing as a Surveyor too.

The legislature is not likely to approve giving biologists a monopoly in this area of overlapping disciplines. If instead the Site Evaluator program were used as a model, they could probably be persuaded to create a narrow new profession of "Wetland Delineators" and in so doing exempt them from the laws limiting work in soils, geology, and surveying provided it is directly in connection with wetland delineation.

I think that two certification/registration programs are needed rather than one, and that the more urgent is that to certify Wetland Delineators.