

**Permit Processing and Efficiency Subcommittee
WAC Recommendations – September 22, 2011**

With regard to our task to evaluate a “Certification Process for wetland professionals”, the subcommittee recommends that a Certification Process *not* be established.

Reasoning: This is a well-intentioned idea, but in practice (based on input from various consultants) if the intent of the program would be to eliminate the need for the DEQ to determine if a certified wetland consultant’s wetland boundary line is accurate without DEQ on-site review, there does not seem to be a way to make it happen due to various constraints. Wetland consultants are not licensed. Establishing a certification program could require significant financial investment to establish a certification protocol as well as a possible long-term annual investment to provide a unit within DEQ to ensure proper compliance with the certification. Without a strong compliance program, it would be extremely difficult to ensure that wetland professionals would work within the limits of any certification or licensing program. Wetland professionals can have tremendous pressure placed on them by clients that often want to minimize the regulations on their property. Without proper oversight there is a significant likelihood of potential abuse of any certification or licensing, and it would be difficult for the DEQ to effectively monitor and/or enforce such a certification.

With regard to our task to evaluate “The definition of wetland and wetland delineation methods, including the role of hydric soils as a factor in wetland delineation”, the subcommittee has been unable to reach consensus, and is seeking needs more discussion of the full WAC.

Reasoning: While the current, 3-parameter Federal approach to wetland delineation is more scientific and can continue without any legislative changes, it is a more expensive and time-consuming, and typically results in the same wetland boundary line (with little or no change as compared to the 2-parameter approach) in 99% of the cases. DEQ utilized 2 parameters from 1979 – 2009 with very few problems, but is it worth the legislative effort to suggest going back?

