

DATE: July 17, 2026

TO: An Open Letter to the Engineering/Scientific Communities within Washington State, USA

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FROM: Tim Reiersen, P.E., M.ASCE

SUBJECT: Ecology Interpretation - Limiting Scope of Professional Engineering License

I'm writing to alert the engineering community to what appears to be a significant reduction, by the Washington State Department of Ecology (Ecology), in allowed scope of practice under the state's professional engineering license. I am a licensed professional engineer in Washington state since 1997 and member of the American Society of Civil Engineers (ASCE) since 1986.

Ecology regulates a spectrum of laws involving various engineering disciplines which are practiced under this license. A partial list includes water resources management for both ground and surface waters, water rights, input to the state Department of Health for public water system planning, waste water discharge permitting, toxic/hazardous waste management and air quality.

As is stated in the attached email string (**Attachment 1**), hydrogeology is being identified as outside the scope of the professional engineering licensed area of practice. As astonishing as this may seem, it is real according to the plain language of the attached emails, which were sent state-wide to county water conservancy boards. In addition I verified this interpretation by verbal communication (**Attachment 2**).

Added documentation. I intend to make a public records request to Ecology for all communications associated with this interpretation, including any legal opinions that Ecology may be acting on. I will share these publicly, though this may take a long time. My last two public record requests from four and six months ago are still pending with the agency.

The impact. The impact will be obvious to those who understand how much engineering practice draws upon the discipline of hydrogeology, for planning and design of dams, bridges, roadways, tunnels, retaining walls, railways, wastewater treatment, irrigation and drainage, construction; and for projects involving groundwater supply, watersheds, floodways, rivers, ports, and oceans. Professional engineers are, and have been, practicing hydrogeology.

Call for action. I share this for awareness. I ask that leadership in the engineering community check my work, collaborate, and make a consensus communication to Ecology. There is some urgency. To use myself as an example, I have hydrogeologic work in progress that I will stamp and submit to a water conservancy board, with full confidence I am within scope of license. It will be disruptive and harmful to my clients if that work is not accepted by water conservancy boards on Ecology's advice; or if Ecology denies water conservancy board decisions on that basis.

The law provides for harmony. The professional engineering license was codified in state law in 1935 (RCW 18.43). The geology (and its specialty areas) licensing statute came later, in the year 2000 (RCW 18.220). The two statutes are harmonized within RCW 18.220.190(6) which exempts "the practice of engineering or other licensed professions..." In this way the creation of the newer geologist, hydrogeologist, and engineering geologist licenses are not subtractions from the professional engineer's broad license domain. The professional engineering license was a pre-existing license where hydrogeology was already being practiced, for decades, in the state.

Due process concern. A due process remedy is elusive. Ecology is not the legislative branch. Such a change in interpretation, after 26 years, would normally require rule-making, but the subject matter is not within Ecology's authorities. If Ecology has filed complaints for out-of-scope practice with the BRPELS against individual professional engineers—for the sole reason that they were practicing hydrogeology—I would like to be informed. Because of this due-process-conundrum, I give the matter over to the engineering community for resolution. As a member of that community, I will provide any support I can.

Sincerely,



Tim Reiersen, P.E., M.ASCE

enclosures: Attachments 1 and 2