

Subject: Re: Open Letter - WA Ecology Interpretation - Limiting Professional Engineering License Scope

From: "Dudley, Noah (DNR)" <Noah.Dudley@dnr.wa.gov>

Date: 8/21/2026, 5:19 PM

To: "dolsenecon@aol.com" <dolsenecon@aol.com>, "tom.tebb@gmail.com" <tom.tebb@gmail.com>

CC: "tim@water-consultant.com" <tim@water-consultant.com>, "tjanderz@mtu.edu" <tjanderz@mtu.edu>, "tatiana.skadorwa@gmail.com" <tatiana.skadorwa@gmail.com>, "Fuller, Ken (BRPELS)" <Ken.Fuller@brpels.wa.gov>, "DOL Boards" <DOLBoards@dol.wa.gov>, "Rowe, Owen (GOV)" <Owen.Rowe@GOV.wa.gov>, "Carol Cowling" <carol.cowling@gmail.com>, "kara-kaelber@franklincd.org" <kara-kaelber@franklincd.org>, "keenns@msn.com" <keenns@msn.com>, "alisa.grumbles@klickitatcounty.org" <alisa.grumbles@klickitatcounty.org>, "ldevera@nwi.net" <ldevera@nwi.net>, "dbrownh2owater@gmail.com" <dbrownh2owater@gmail.com>, "Christensen, Dave (ECY)" <davc461@ECY.WA.GOV>, "tmcdonald@cascadialaw.com" <tmcdonald@cascadialaw.com>, "Mattson, Larry (ECY)" <lama461@ECY.WA.GOV>

Tom, thank you for providing this analysis. I truly appreciate your time and willingness to help both professions navigate this statutory issue.

As we move forward, I encourage all parties to keep the tone professional and respectful. Engaging in personal attacks is rarely helpful or productive.

Thank you

Noah Dudley, Board of Geologists Chair

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sent from a phone - please excuse typos

From: dolsenecon@aol.com <dolsenecon@aol.com>

Sent: Friday, 21 August 2026 15:42:19

To: tom.tebb@gmail.com <tom.tebb@gmail.com>

Cc: tim@water-consultant.com <tim@water-consultant.com>; tjanderz@mtu.edu <tjanderz@mtu.edu>; tatiana.skadorwa@gmail.com <tatiana.skadorwa@gmail.com>; Fuller, Ken (BRPELS) <Ken.Fuller@brpels.wa.gov>; DOL Boards <DOLBoards@dol.wa.gov>; Dudley, Noah

(DNR) <Noah.Dudley@dnr.wa.gov>; Rowe, Owen (GOV) <Owen.Rowe@GOV.wa.gov>; Carol Cowling <carol.cowling@gmail.com>; kara-kaelber@franklincd.org <kara-kaelber@franklincd.org>; keenns@msn.com <keenns@msn.com>; alisa.grumbles@klickitatcounty.org <alisa.grumbles@klickitatcounty.org>; ldevera@nwi.net <ldevera@nwi.net>; dbrownh2owater@gmail.com <dbrownh2owater@gmail.com>; Christensen, Dave (ECY) <davc461@ECY.WA.GOV>; tmcdonald@cascadialaw.com <tmcdonald@cascadialaw.com>; Mattson, Larry (ECY) <lama461@ECY.WA.GOV>
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External Email

Tom,

It was appropriate/timely for you to wade-in on the "Great PE vs Hydro-Geologist" controversy, given life by Dave Christiansen (he apparently is a devote reader of Mary Shelly, tends to explain several of his Ecology policy assertions).

The memorandum, at times, seems to "yes,but" in places, but your table regarding PE professional authority/actions is on-point, as summarized below:

Application to Groundwater Water-Right Evaluations Technical Activity Conclusion in Source Analysis Design:

*Conduct, or supervise a pumping/aquifer test, Yes;
If within PE competence Measure and interpret drawdown and recovery, Yes;
Estimate transmissivity and storage coefficient/specific yield, Yes;
Apply analytical or numerical groundwater methods, Yes;
Calculate pumping cone/zone of influence, Yes;
Predict drawdown at nearby or distant wells, Yes;
Analyze cumulative pumping effects and hydraulic interference, Yes;
Evaluate physical impairment of existing wells/water rights Likely, Yes;
Provide an engineering opinion on interference/impairment, Yes.*

This covers about 95% of all technical evaluations needed by resources managers--like me, with about 35 years of technical/policy experience.

Timing wise, I am now embroiled in a competence bereft argument with Larry

Mattson (OCR) regarding the new well for Mercer Ranches, to provide 85 acre-ft. of water for farm worker housing and a new crush facility. The water right is fully mitigated from any Columbia River impact as you noted three years ago. But Scott Turner did not get the permit written, and three years later he sends out a "preliminary permit," written by Ingrid. Ingrid and Scott believe this is too technical for Tom Buchholtz (PE, thirty-plus years working on wells for DNR and IRZ. Tom has fully evaluated the the well. You are very familiar with his skill set, and the management-technical decisions coming out of OCR are pathetic.

About one year ago, at a OCR advisory group meeting, I politely conveyed to Larry that CSRIA did not need money, it needed competence. Competence is far more valuable than checks from the legislature.

Respectfully,

D.O.
Board Chairman, BCWCB
Board Alternate, FCWCB
509-783-1623

In a message dated 8/21/2026 10:18:55 AM Pacific Daylight Time,
tom.tebb@gmail.com writes:

Good morning,

I wanted to share with all of you a memorandum I wrote and submitted to the Geology Licensing Board Chair, Noah Dudley, at the Washington Department of Natural Resources for his consideration. These are my opinions only, and I recommended to Noah that getting an Attorney General opinion on this matter would be beneficial for all concerned.

Best regards,

Tom Tebb, LHG, LEG

On Sat, Aug 15, 2026 at 9:52 PM <dolsenecon@aol.com> wrote:

To All,

The BCWCB-FCWCB does not support Dave's newly invoked interpretation of the RCW and WAC. Dave's action here is destructive and is counter to Gov. Ferguson's recent directive to WRP Ecology, calling for policy actions promoting water supplies/agency actions that ensure water management resiliency.

Dave's ability to ignore the Governor is a special talent; perhaps he answers to a higher power? The Goddess Gaia?

D.O.

Chairman, BCWCB-Board Alternate, FCWCB
509-783-1623

In a message dated 8/14/2026 5:44:31 PM Pacific Daylight Time,
tim@water-consultant.com writes:

To All:

I have received no indication that this issue is being addressed. Please see attached .eml file (string of emails) where the Grant County Water Conservancy Board recently asking some clarifying questions, and Dave Christensen with Ecology provided answers. I have just responded (also in the email string) with a request to the board not to follow Ecology's suggestion and novel interpretation of law, which purports to limit the scope of the Washington State professional engineering license to exclude the discipline of hydrogeology.

This has implications far beyond me personally and my career's work as a consultant on water rights. This will severely limit the work of licensed professional engineers in Washington state; specifically: within the branches of transportation, hazardous and toxic substances (Hanford site, for example), flood control, ocean structures, ports and harbors, structures, public health (water supply and wastewater treatment), geotechnical, among other

areas of practice. As professional engineers, we must consider hydrogeology in every situation, if not only to exclude its importance to a particular project.

I'm not sure that the impact is understood--of what Ecology is saying in these emails. I'm also feeling unsettled, that an error of interpretation that is so plainly obvious to me, doesn't seem to be visible to others; e.g. RCW 18.220.190(6)(a) specifically exempts professional engineers from the requirement to obtain a geologist's license. To be blunt: what are we doing here?

I have an ethical obligation under the licensing statute and my membership within a professional society, the American Society of Civil Engineers, to serve the interests of my clients, and to work the projects I have contracted. I intend to meet those obligations as best I can. I will continue working within the scope of my license, and I will continue to draw from the discipline of hydrogeology as my work routinely requires.

Sincerely,
Tim Reiersen, PE, CWRE, M.ASCE

Streamline Water Consulting LLC

Tim Reiersen, PE tim@water-consultant.com

he/him RYE er sun

6604 Applevue Rd ph (509) 965-7175

Yakima WA 98908 fax (509) 965-6995

*I do not use "AI", genAI or large language models in my work.
For ethical, environmental and humanitarian reasons.*

On 7/17/2026 6:16 PM, Tim Reiersen wrote:

To All:

Please see attached letter, with two attachments in separate files, and share with the engineering, scientific, and public policy communities affected by the Washington State Department of

Ecology's new interpretation of law. The new interpretation appears to limit the scope of practice, within the professional engineering licensed areas of practice, to exclude hydrogeology.

Thank you,

Tim

--

Streamline Water Consulting LLC

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