

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

From: Tim Reiersen <tim@water-consultant.com>

Date: 8/24/2026, 8:12 AM

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

CC: tjanderz@mtu.edu, tatiana.skadorwa@gmail.com, Ken.Fuller@brpels.wa.gov, DOLBoards@dol.wa.gov, NOAH.DUDLEY@dnr.wa.gov, Owen.Rowe@gov.wa.gov, carol.cowling@gmail.com, kara-kaelber@franklincd.org, keenns@msn.com, alisa.grumbles@klickitatcounty.org, ldevera@nwi.net, dbrownh2owater@gmail.com, davc461@ecy.wa.gov, tmcDonald@cascadialaw.com

A request to all:

Please send me any documents or updates on this issue. I have created a webpage and I will attempt to track significant developments there.

<https://water-consultant.com/Ecology-PE-License-Issue/>

To Tom:

I request two clarifications before publishing your memo.

1) I would like to have crystal **clarity on your representation and authority with respect to the issue at hand** (if any), because to my understanding you have retired from Ecology and do not represent them in any way, currently. Nor do you represent either the Geologist Licensing Board or Board of Registration for Professional Engineers & Land Surveyors, is that correct?

2) Yet **Dave Christensen with Ecology** mentioned to me, he had spoken with you while forming his opinions, and Dave told me you concurred that the professional engineering license scope did *not* include the practice of hydrogeology. That's why, on July 23, 2026, I called you right after getting off the phone with Dave, and you confirmed as much to me (my record of our July 23, 2026 conversation is available here: https://water-consultant.com/docs/pe/Attach_02_Verbal_Communications.pdf). Feel free to **send me any records** you may have of our conversation and I will post them.

3) Would you **please share the specific information** that--apparently--caused you to make a dramatic shift in opinion, comparing your August 20, 2026 memo to your communications of about a month ago with Dave Christensen at Ecology and me (see previous link documenting my conversations with Dave and you).

Because you have made your opinions known in the area of scope of license, and as a former Ecology manager, I have one more question to request your opinion about. **What is your opinion as to Ecology's legal authority to set the scope of license for professional engineers?** Please include the laws and rules you rely on in your answer? It's understood you're not an attorney and you would not be giving a legal opinion. I ask because you have now made your opinions known, and you appear to continue to have influence with Ecology.

Please share your answers with the group.

In closing I will add that my intention with my open letter was to invite the professional engineering communities--as represented by their licensing board and professional associations--to investigate and adopt formal position statements on the matter. And, potentially, to prepare for litigation if it comes to that. **I did not intend for the emails here to be the location where the debate is held.**

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

Streamline Water Consulting LLC

Tim Reiersen, PE tim@water-consultant.com
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*I do not use "AI", genAI or large language models in my work.
For ethical, environmental and humanitarian reasons.*

On 8/21/2026 10:18 AM, Gordon Tebb wrote:

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

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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

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