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Sent: Wednesday, August 26, 2026 1:56 PM

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Subject: Update on Professional credential on submitted decisions and reports of exams

Good afternoon, Water Conservancy Board Contacts,

I am writing to provide updated information for Water Conservancy Boards that supersedes the guidance in my July 8, 2026, email (see attached).

Following discussions with the Geologist Licensing Board, Ecology has identified significant ambiguity in the statutory language governing licensed professional engineers under chapter 18.43 RCW as it relates to hydrogeologic analyses. Additional legal analysis may be undertaken to help clarify potential overlap between the authorities for engineering under chapter 18.43 RCW and geology/hydrology under chapter 18.220 RCW.

Until further notice, hydrogeologic analyses submitted to a Water Conservancy Board may be completed by either:

- A licensed hydrogeologist under RCW 18.220, or

- A licensed professional engineer under RCW 18.43 provided the analysis is within the licensed engineer's expertise.

When Ecology reviews Water Conservancy Board records of decision and reports of examination (ROD-ROEs), Ecology will confirm that:

- Engineering analyses are stamped by a licensed professional engineer; and
- Hydrogeologic analyses are stamped by either a licensed hydrogeologist or a licensed professional engineer with relevant expertise.

If Ecology identifies a required analysis that is not appropriately stamped, Ecology will ask the Water Conservancy Board and applicant to either provide a stamped analysis or withdraw the ROD-ROE until one can be provided. If a stamped analysis is not provided following that communication, Ecology will reverse the ROD-ROE and deny the change application.

We understand this issue has been difficult to navigate over the past month and regret additional work caused by the earlier guidance. Thank you for your continued efforts to apply the relevant laws and rules.

If you have questions about how this would apply to any specific project, please contact Benjamin Carr or Herm Spangle.

Please feel free to contact me if you have other questions or concerns. However, my response may be delayed as I will be out of the office on leave through Labor Day.

Best regards,
Dave

Dave Christensen (*He/ him*)

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<https://ecology.wa.gov/Water-Shorelines>

This communication is a public record and may be subject to disclosure as per the Washington State Public Records Act, RCW 42.56.

— Attachments: —

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