



STATE OF WASHINGTON
DEPARTMENT OF LICENSING
PO Box 9045 • Olympia, Washington 98507-9045

March 19, 2009

Mr. Mark Molinari, President
Association of Engineering Geologists
10585 NE Manor Lane
Bainbridge Island, WA 98110

**RE: COMMENTS ON THE “ENGINEERING AND GEOLOGY PRACTICE
GUIDELINES”**

Dear Mr. Molinari:

This letter presents the Washington State Geologist Licensing Board’s general comments about the Joint Task Force on Areas of Practice (JTFAP) document. In our opinion, this document is not ready for specific comments. First and foremost, we question whether there is a need for such a document and have found nothing in the JTFAP treatise content to be a convincing argument for its development. Many states have clear definitions for the practice of geology and three (Washington, Oregon, and California) regulate the practice of engineering geology. To our knowledge, none of the states requested this “clarification.” Plainly said, there is no value added to the profession with this document.

In Washington, we recognize there are overlap areas between geotechnical engineering and engineering geology and between engineering geology and geology. We deal quite well with the overlap by judging conflicts in conjunction with the Board of Registration for Engineers and Land Surveyors, by evaluating whether a geologist, engineering geologist, or engineer is practicing within their education, training, and experience, and whether there is “harm done to the public.” The JTFAP document adds a complicating factor to our state law, if others attempt to impose it on the state and its geo-practitioners.

Most concerning to this Board is the Bodies of Knowledge (BOK) matrix. We do not believe this information is an appropriate or helpful addition to the definition of the practice. Elsewhere in the document, overlap is heralded as the key element among the geo-professions; however, the matrix makes distinctions where none exist. Such a tool will be misused to the detriment of solid geo-professionals.

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The JTFAP document states in several places that it is meant only to be used as guidance, to define practice skills and the knowledge base for employees, government agencies, and regulating legal jurisdictions. It claims it is not to be used in legal proceedings, specifications, contracts, regulations, or statutes. However, it has been the Board's experience if the document exists, it will be used in unintended ways by those who wish to exploit it. In the way it defines the details of practice, this document cannot fail to impinge on the definitions of geologist and specialty practice (engineering geology and hydrogeology) in the State of Washington.

We recommend this JTFAP guidelines document be retracted. Its purpose should be revisited and justified to all of the professions involved. If sufficient evidence is accepted by each of the professional organizations and state boards of geologists, then a new version of the document should be drafted, this time taking into account state laws and eliminating the BOK matrix.

Thank you for the opportunity to comment on the JTFAP document. We appreciate the 4½-year effort that the task force has given to the formulation of this document. However, the one month review period for practicing members and state boards of licensed and registered geologists is inadequate. Additionally, our Washington Geologist Licensing Board was not consulted. Surely, something as important as the definition of our profession deserves more scrutiny and discussion.

Sincerely,



Jeffery H. Randall, Ph.D., L.HG, Chair
Washington State Geologist Licensing Board



William T. Laprade, L.E.G., Member
Washington State Geologist Licensing Board
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