

**From:** [Sunset Advisory Commission](#)  
**To:** [Brittany Calame](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Wednesday, August 15, 2018 2:01:45 PM

---

-----Original Message-----

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission  
Sent: Wednesday, August 15, 2018 2:01 PM  
To: Sunset Advisory Commission <Sunset@sunset.texas.gov>  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS BOARD PROFESSIONAL GEOSCIENTISTS TBPG

First Name: Aaron

Last Name: Correll

Title:

Organization you are affiliated with:

Email:

City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or  
Opposed:

The Sunset Advisory Board has made several arguments against the Texas Board of Professional Geoscientists (TBPG). However, these arguments are misguided and limited mostly to the perceived scale and effectiveness of its role.

One of the primary arguments made by the Sunset Advisory Board is that the TBPG's role is effectively being fulfilled by other state agencies. I must strongly disagree. Although the TBPG and state agencies such as the RRC and TCEQ share an obligation to ensure the public's health and safety, representatives of the state do not typically perform geologic studies or provide geologic interpretations. Furthermore, geologic work submitted to state agencies may not necessarily be reviewed by a qualified geoscientist.

Determining site-specific groundwater-bearing zones, preparing hydrogeologic models, and identifying sinkholes or other aquifer recharge features are examples of critical geologic interpretations that protect the public, which state agencies do not generally perform. Without the TBPG, the state cannot ensure that submitted work was completed by a qualified professional. Simply put, state agencies cannot effectively perform the function of the TBPG.

The Texas Board of Professional Geoscientists occupies a pivotal role between private interests and state regulation. It ensures qualified professionals conduct proper geoscientific work that adheres to a code of ethics. Therefore, I oppose the recommendation to abolish the TBPG.

Please consider the following as an example of the TBPG's importance:

Development over the Edwards Aquifer Recharge Zone requires a geologic assessment to identify groundwater recharge features, such as caves, sinkholes, etc. The Edwards Aquifer provides a significant amount of drinking water for central Texas. Protecting these features is critical to protecting drinking water and important for its long-term viability. The assessment includes traversing an entire property via transects spaced 50 feet apart. Recharge features can be very subtle and require a practiced geologist to consistently identify. Having a licensed

geoscientist greatly reduces the chance of missed or misidentified features. Considering the amount of terrain covered during one of these assessments, the state cannot ensure the quality or completeness without the seal of a licensed geoscientist. Additionally, these studies identify future potential hazards - Collapsed sinkholes have been responsible for damage in the past.

Any Alternative or New Recommendations on This Agency: None.

My Comment Will Be Made Public: I agree