

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, August 15, 2018 11:31:55 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Wednesday, August 15, 2018 11:16 AM
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: Lance

Last Name: Crabtree

Title: Senior Project Manager/Professional Geoscientist

Organization you are affiliated with: Terracon Consultants, Inc.

Email:

City: Dallas

State: Texas

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

Let me first say that I wholeheartedly disagree with the SAC's recommendation to abolish the TBPG. The SAC states that there is a "historical lack of meaningful enforcement action, no measurable impact on public protection, and more direct oversight of geoscientists' work provided by other state agencies' render ongoing state regulation of geoscientists unnecessary to protect the public".

I feel that the lack of meaningful enforcement action is a testament to the success of an agency and this is highly subjective. What constitutes "meaningful"? There are many instances of infractions in other professions and real life but how severe should an enforcement action be to qualify as meaningful....monetary?, debarment?, incarceration?

The SAC's next statement regarding no measurable impact on public protection is again subjective and often times not easily seen or understood outside of the profession. Measurement of impact is qualitative rather than quantitative and as any geoscientist knows, geologist impacts can occur over a long time period. Just because no catastrophic events have occur does not indicate a lack of need. Often groundwater contamination and migration can occur over an extended time and because contaminants haven't reached a portable groundwater supply well today doesn't mean that is cannot occur tomorrow.

If the main argument of the SAC is that the TBPG does not protect the public, then could SAC also provide justifications for licensing of other professions such as Auctioneers or Message Therapy? How exactly is an auctioneer protecting the public?

The last statement concerning oversight by other agencies is false. The Texas Commission on Environmental Quality (TCEQ) relies heavily upon the professional opinions of geoscientist. Additionally, the TCEQ requires that all reports with geologic information be sealed by a PG. I think the TCEQ values the work that geoscientist do to

help ease their daily burden.

The SAC's assumption that half of PGs are exempted is not an accurate reflection of the profession. As with any relatively new agency, exemptions and grandfathering is expected. As the life cycle of any agency ages, it is reasonable to expect that the number of exempted licensees will decline as these individuals retire or leave the profession. This would also help explain the decreasing number of licensed individuals and less younger persons are entering the geoscientist field.

In summary, I feel that abolishing the TBPG would be detrimental to the citizens of the great State of Texas.

Any Alternative or New Recommendations on This Agency: Alternately, the SAC should reconsider its recommendation to abolish the TBPG.

My Comment Will Be Made Public: I agree