

**From:** [Sunset Advisory Commission](#)  
**To:** [Brittany Calame](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Friday, August 24, 2018 11:14:05 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission  
Sent: Friday, August 24, 2018 10:34 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: Manetta

Last Name: Dillingham

Title: P.G.

Organization you are affiliated with:

Email:

City: Longview

State: Texas

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

I have worked as a geologist in both the mining and environmental sectors. As a mining geologist conducting exploration activities for lignite in areas of East Texas there was no need for me to be a licensed geologist. I resisted the urge to pursue licensure since I saw no need for it. After working as a coal exploration geologist for a number of years, I decided to apply for licensure and take the ASBOG exam. Shortly after receiving my license, Obama era regulations caught up with the coal industry in East Texas and I found myself looking for employment. Fortunately, my licensure has enabled me to work in the environmental field.

I strongly oppose the Sunset Commissions recommendation to abolish the TBPG.

Much of the work I do is predicated on my licensure. For example, much of my work involves Phase I Environmental Site Assessments. Conducting a Phase I ESA involves evaluating the presence of Recognized Environmental Conditions and discerning these from de minimis conditions, assisting the general public in making decisions regarding acquisitions of retail centers, historic areas, brownfields, machine shops, etc. Opinion concerning the threat of a likely environmental release and communication of this information in support of real estate transactions is a critical public service. These individual decisions potentially carry tremendous personal repercussions for the people that make them and the lenders that facilitate the transactions. Knowledge and experience with environmental releases is typically held by geologists, soil scientists, biologists, and chemists working as environmental consultants and either holding a PG license or working under the supervision of a PG. Phase I ESAs performed by qualified environmental scientists, especially those with knowledge regarding local geology and site history are critical in assisting the public in making informed decisions regarding real estate transactions. The PG license is important to Texas when selecting an environmental professional qualified to provide a Phase I ESA that will satisfy the requirements of 40 CFR 312. In addition, please consider the possibility that removal of the PG license will necessitate creation of another Texas license, or worse, a federal license, in the future so that qualified Texans can demonstrate that they meet the requirements of 40 CFR 312.

Many reports filed with the TCEQ regarding leaking underground storage tanks, affected property assessments, geologic assessments, risk-based assessments, etc. require licensure. If not a PG, then a PE. Removing PGs from the equation is going to increase costs for many of our clients.

Any Alternative or New Recommendations on This Agency: Perhaps in addition to abolishing the PG licensure, you should consider abolishment of Professional Engineers.

My Comment Will Be Made Public: I agree