

**From:** [Sunset Advisory Commission](#)  
**To:** [Brittany Calame](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, August 6, 2018 7:56:03 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission  
Sent: Sunday, August 5, 2018 4:26 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: Mauricio

Last Name: Flores

Title: Comment For the Continuation of the TBPG

Organization you are affiliated with:

Email:

City: San Antonio

State: Texas

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

I disagree with the Texas Sunset Commission's recommendation to abolish the Texas Board of Professional Geoscientists. The Sunset Commission asserts among its reasons that "History shows no catastrophic event or public harm as the impetus for creating this regulation" and that the commission "found no examples or evidence of significant public harm directly attributable to unqualified or unlicensed geoscientists". Despite that the commission acknowledges the "before and after" of when the TBPG was established, it seems to ignore that one of the central benefits of the TBPG (and similar institutions or agencies such as the Texas Board of Professional Engineers) is that it serves as a source of preventative measures. The Sunset Commission's argument seems akin to stating:

"The Board for Lake, River, and Ocean Safety was established to ensure the safety of swimmers in the area's bodies of water, many of which are shark-infested and have various wave hazards. The agency has established various practices meant to prevent fatalities of citizens in our region's water bodies. However, it is recommended to abolish the agency since there have been little to no deaths of citizens in our region's water bodies."

Would the negligible amount of fatalities not be at least partly due to the efforts of the said agency? Is an agency's existence only legitimate if a very large amount of abuse or negligence exists? Is removing the cap that such agencies provide a sensible and sustainable action?

Preventative measures are especially essential when it comes to the enforcement of ethical geoscience practices, particularly when considering that Texas's natural resources will face greater pressures as our state's population continues to grow.

The Texas Sunset Commission also asserts that various other agencies such as the Texas Commission on Environmental Quality already fill the role of agencies such as the TBPG, which would be a valuable point if it were not for the importance of agencies like the TBPG as more specialized agencies.

Although there are geoscientists in the TCEQ, the TCEQ has a broader focus and its resources are best served

towards maintaining that broad, baseline, and fundamental role. Furthermore, although boards of other practices such as engineers can be related to geoscience, they are not geoscience, and do not approach problems nor solutions through a geoscientific perspective. The related practices are best when working in a complementary fashion.

Perhaps more importantly, the TBPG has been revenue positive. The TBPG contributes more than it takes. Although the Texas Sunset Commission's role is noble and important, attempting to sunset organizations that have so far met or exceeded expectations (while being revenue positive) is very illogical. Such efforts towards abolition of responsible and relevant organizations is much closer to being an actual waste of taxpayer money. In its goal to ensure the best use of Texans' money, the Texas Sunset Commission must remember to not try to cut body fat that is not even there. Its efforts are best directed towards agencies that are truly inefficient and wasteful.

Any Alternative or New Recommendations on This Agency: N/A

My Comment Will Be Made Public: I agree