

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, August 16, 2018 5:58:43 PM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Thursday, August 16, 2018 5:37 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: Gilbert

Last Name: Gabaldon

Title: Senior Project Manager

Organization you are affiliated with: GHD, Inc.

Email:

City: Houston

State: Texas

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

My name is Gil Gabaldon. I'm an environmental geologist with over 27 years of experience in evaluating the risks posed by polluted sites and contaminated groundwater. I support the continued licensure of Professional Geoscientists, which I believe protects the public interest for the following reasons.

A professional geologist will have the knowledge and training to complete field activities and reports that represent the best interest of the public health and the environment. Our clients want to do the right thing and often rely on consultants to provide them with information and recommendation to make informed decisions about the right path forward.

Since the requirements for P.G. licensure and continuing education began, I have witnessed a substantial improvement in the quality of work performed by geoscientists industry-wide as I have reviewed the work of others I have worked with. This is in keeping with the fact that 31 states (containing over 75% of the population of the U.S.) regulate the practice of geoscience.

Certainly the work the professional geologists in my office continues to uphold the highest standards.

The Sunset Advisory Commission report stated that "direct oversight of geoscientists' work provided by other state agencies' render the ongoing regulations of geoscientists unnecessary to protect the public." I disagree since I do not believe that the staff of the other agencies (i.e. Texas Commission on Environmental Quality and the Railroad Commission of Texas) are inherently qualified to review all geologic aspects of groundwater contamination risk assessments without proper training. In addition, the agencies are understaffed and reports are not often given the attention they should be especially as it relates to the impacts to public health and the environment. Rather, the regulatory staff members involved need to be properly trained with stringent ongoing education requirements to prepare them to protect the public interest in their regulatory work. The P.G.

licensure requirements fulfill this need and I urge you to consider keeping the P.G. program intact.

Thank you,
Gil Gabaldon, P.G.
Sr. Project Manager
GHD, Inc.
Houston, Texas

Any Alternative or New Recommendations on This Agency: There should be no alternative but to keep the professional geologist licensure and program intact. Anything else would not be in the best interest of the public and environment.

My Comment Will Be Made Public: I agree