

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, August 30, 2018 1:23:09 PM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Thursday, August 30, 2018 9:58 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: David

Last Name: Gilchriest

Title: Professional Geoscientist

Organization you are affiliated with:

Email:

City: Houston

State: Texas

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

Opposed.

I support the continued licensure of Professional Geoscientists which I believe assists in the protection both public and private interests in the state of Texas.

Contaminated soils and subsurface migration of impacted groundwater represents both health and legal risks to landowners, property inhabitants, groundwater users, and even sportsmen who hunt and fish within Texas. Evaluation of the associated risks and their management is best addressed by licensed geoscience professionals with high standards. Licensing standards in fields of practice such as engineering, medical, and law, for example, are required due to the potential for harm if unqualified individuals enter the field. The standardization and licensing of professional geoscientists as applied by the Texas Board of Professional Geoscientists assists Texans by providing certification that the individual involved in the practice of geoscience understands, both technically and ethically, the scientific perspective as well as the public and private risks that exist when dealing with contaminated media. Although professional engineers may also participate in these processes with their specializations and provide their certifications when required, it is my opinion that surface and subsurface impacts, migration and management issues are best addressed by licensed geoscientists with hydrogeologic training.

The Sunset Advisory Commission report states that "the board grandfathered about 78 percent of the current licensees into the profession without licensees passing the rigorous exam requirements to obtain a license." Currently a large part of the practicing geoscientists are grandfathered, however, this would be a constantly decreasing percentage as practitioners retire, allow licenses to expire, or move on to other fields, leaving a higher and higher percentage of licensed Professional Geoscientists that have in fact been certified in having fulfilled the university degree requirements and passed the exam requirements to obtain the license. This is in addition to the

fact that 31 states (containing over 75% of the population of the U.S.) regulate the practice of geoscience in a similar fashion.

The Sunset Advisory Commission report also states that “direct oversight of geoscientists’ work provided by other state agencies’ render the ongoing regulations of geoscientists unnecessary to protect the public.” I do not agree since I do not believe that the agencies (i.e. Texas Commission on Environmental Quality and the Railroad Commission of Texas) typically tasked with oversight of environmental regulation within the state are by default qualified to review all geologic aspects of contamination risk assessments without proper training. Rather, agency staff members involved also need to be properly trained with ongoing education requirements to prepare them to protect the public interest in their regulatory work. The P.G. licensure requirements fulfill this need and allow an equal standing for professionals both inside and outside the regulatory agencies.

Thank you,
David Gilchriest, P.G.

Any Alternative or New Recommendations on This Agency: Continue the approval and activity of of the Texas Board of Professional Geoscientists.

My Comment Will Be Made Public: I agree