From: Sunset Advisory Commission

To: Brittany Calame

Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)

Date: Thursday, August 16, 2018 1:58:49 PM

----Original Message-----

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission

Sent: Thursday, August 16, 2018 1:48 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: Jarrette

Last Name: Ireland

Title: President

Organization you are affiliated with: J. L. Ireland & Assoc., inc.

Email:

City: Kerrville

State: Texas

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

I have practiced engineering geology, hydrogeology, and environmental geology for over 45 years. I have worked in 44 states in the US with foreign projects on most major continents.

I was licensed in Texas(PG No. 33) through the grandfather clause, and I am licensed in Idaho (PG No. 1300) by taking the national ASBOG exam. I must take exception to the recommendations of the Sunset commission. I will keep my comments brief.

- 1. It was noted that there has been a decline in the number of licenses issued through time. This is the same progression that has taken place in other states. There is always a group seeking licensing through a grandfather clause. There is attrition within this group over time due to reciprocity, retirement, death, or change in employment/location. Secondly, the number of registrants reflects economic trends of development.
- 2. I have found since the initiation of licensing in Texas a greater effort has been made to maintain standards of care and high ethical standards.
- 3. It was stated that state agencies such as the TCEQ provide robust evaluation of geoscience work than the board.
- 4. First many of the regulations and guidelines by the TCEQ and other agencies were developed through cooperation with licensed geoscientists.

Licensed professionals are the reviewers at the agencies.

- 5. It is not the role of the board to dictate the standards of care of our profession. This is also true of engineering board of the state.
- 6. It is stated that Texas is only one of 29 states that regulate the practice of geoscience. According the National Association of State Boards of Geology, there are 31 states and one territory that regulate the practice.

What is of greater significance is that over 80% of the population of the United States reside in the regulated states or provinces.

7. In my opinion, an unregulated practice in Texas would leave the population at greater risk by unqualified persons conducting programs that affect public health, the environment, and the economy.

Any Alternative or New Recommendations on This Agency: I recommend maintaining the Texas Board of Professional Geoscientist .

My Comment Will Be Made Public: I agree