

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, August 10, 2018 1:00:11 PM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Friday, August 10, 2018 12:05 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: Edward

Last Name: James

Title: Principal

Organization you are affiliated with: Terracon Consultants, Inc.

Email:

City: Houston

State: Texas

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

I appreciate the opportunity to provide comments to the Sunset Advisory Committee concerning the Texas Board of Professional Geoscientists. I am a Professional Geoscientist registered in the great State of Texas and am very proud of this designation. I feel I serve a valuable purpose to my clients, the state regulatory agencies that review and rely on my work, and the public. I strongly oppose your recommendation to abolish the Texas Board of Professional Geoscientists and to repeal the Texas Geoscience Practice Act.

As an Environmental professional, I review many regulatory files from the Texas Commission on Environmental Quality (TCEQ) and Railroad Commission of Texas (RRC) and I have reviewed hundreds of geoscience work products over the years and have encountered many that would and should be considered substandard to the profession. Some resulted in additional environmental impact, specifically with respect to groundwater, which has a huge potential to affect the health and welfare of the citizens of Texas.

As such, I think it essential that steps be maintained to ensure that the practice of geoscience is being performed only by qualified professionals. I feel the TCEQ and RRC should take stronger actions when they observe incompetency during their review of professional geoscience services and should file complaints when warranted. Since these two agencies oversee and review the majority of geoscience work products, their actions are essential to the purpose of the Board in ensuring only qualified persons carry out the public practice of geoscience. Therefore, your conclusions that "the historical lack of meaningful enforcement action, no measurable impact on public protection, and more direct oversight of geoscientists' work provided by other state agencies' render ongoing state regulation of geoscientists unnecessary to protect the public" is part in true, but the inherent reluctance of these agencies to file complaints with the Texas Board of Professional Geoscientists when warranted is a contributing factor. The lack of enforcement up to this time does not mean there is no need for the Texas Board of Professional Geoscientists and the Texas Geoscience Practice Act to ensure qualified professional are conducting the practice of

geoscience in Texas. We all need to maintain our commitment to the public health and welfare.

I respectfully request that you reconsider your recommendation and that you do not abolish the Texas Board of Professional Geoscientists.

Any Alternative or New Recommendations on This Agency: Maybe there should be consider in combining the Texas Board of Professional Engineers and the Texas Board of Professional Geoscientist into one single board.

My Comment Will Be Made Public: I agree