

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, August 15, 2018 3:21:27 PM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Wednesday, August 15, 2018 2:30 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: Robert

Last Name: Musick

Title: Technical Examiner at the Railroad Commission of Texas

Organization you are affiliated with: employed by the Railroad Commission of Texas

Email:

City: Austin

State: Texas

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

I support the continued licensure of Professional Geoscientists (PG). I disagree with the findings that the Board does not protect the public interest. Following are some thoughts:

Continued education requirements to maintain a PG in Texas helps develop consistency in the geological knowledge base across Texas. This education requirement for practicing geoscience professionals result in a competent and well-informed professional group. These geoscience professionals are capable of meeting the needs of the State of Texas when geological interpretation is needed to formulate an answer to some complex soil and groundwater issues.

It should not be under-estimated how important routine continued education is to maintain a well-informed geoscience work force. Without this education requirement under the Texas Board of Professional Geoscientist, it may not be possible to sustain a knowledgeable group of geoscience professionals to continue to perform complex environmental assessments to protect human health and the environment in Texas.

It should not be under-estimated how the regulatory community often depends on the Texas PG Seal on environmental cleanup or environmental assessment reports or plans. The PG Seal gives a secondary level of comfort that geological interpretation work is being performed by a competent geoscience practitioner.

In almost all regulatory programs across Texas that technically review environmental remediation or assessment plans and reports, a PG Seal is required if geoscience interpretation has been performed and presented in the environmental plan/report. Often a regulatory agency will not approve the environmental remediation or assessment report or plan unless the document is under a PG Seal. It should not be under-estimated on the benefit of the PG seal during the review process which establishes that a practicing geoscientist either prepared the document or interpreted the geoscience used the conclusions of the document (e.g., assessment/remediation).

This saves taxpayer dollars and often results in a document submitted to the regulatory agency that has been scrutinized by different persons and possible different perspectives. The scrutiny by a practicing geoscientist and the regulator (who may or may not be a PG) results in protection of communities across Texas.

Any Alternative or New Recommendations on This Agency: None at this time

My Comment Will Be Made Public: I agree