

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, August 14, 2018 4:19:31 PM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Tuesday, August 14, 2018 4:19 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: Brian

Last Name: Noonan

Title: P.G.

Organization you are affiliated with:

Email:

City: Houston

State: Texas

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

I have been working in the Environmental Geology field for ~20 years working on site characterization, remediation of soil and groundwater issues, human health and ecological risk assessments. The PG certification is, in my opinion, a critical certification for qualifying experts in the field to do this type of work. In addition to representing some baseline level of knowledge that the firm or individual has, the certification also carries with it an ethics component which helps to ensure that the professionals working on these issues put public safety first when it comes to long term strategies for site management.

When hiring a firm or Geoscientist, one of the first things I usually check on is the enforcement history of the firm or individual on the TBPG web site (for work in Texas). However, one of the reasons cited in the report for abolishment of the PG was the lack of violations / enforcement by the Board.

The report states that enforcement is, or could be handled by the state agencies charged with review of the professional work product. Beyond review and comment of regulatory submittals, I do not believe these agencies have the resources to act as the regulatory review for individuals practicing these sciences. Furthermore, not all staff of the regulatory agencies are trained in geology and/or hydrogeology and therefore may not be qualified in all cases to review all technical work product. Instead, they must rely on the expertise of the licensed individual. The P.G. licensure requirements fulfill this need.

Based on these issues, I support the continued licensure of Professional Geoscientists.

Any Alternative or New Recommendations on This Agency: Continue to require the licensure of Professional Geoscientists in Texas.

My Comment Will Be Made Public: I agree