

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, August 15, 2018 4:43:18 PM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Wednesday, August 15, 2018 4:12 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: Sylvia

Last Name: Pope

Title: Hydrogeologist, P.G. license #1351

Organization you are affiliated with:

Email:

City: Austin

State: Texas

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

I am writing to protest the recommendation of the Texas Sunset Advisory Commission to abolish the Texas Board of Professional Geoscientists. My professional experience in the practice of hydrogeology has been with the City of Austin, Watershed Protection Department until my retirement in May 2018. During my tenure as a hydrogeologist with the City of Austin, we reviewed the work of professional geoscientists conducting groundwater studies and projects that had the potential to impact drinking water.

Drinking water quantity and quality are significant public health issues in the state of Texas, as you may be aware. The City of Austin reviews Environmental Resource Inventory reports and other geologic reports pertaining to the protection of the Edwards Aquifer and the Edwards-Trinity Aquifer. City of Austin Code and Criteria require that Environmental Resource Inventory (ERI) reports be prepared by a Texas-licensed professional geoscientist (Texas P.G.) in order to ensure that accurate and complete information is provided. In physiogeographic areas outside of the Edwards Aquifer Recharge Zone, it is not a requirement that a Texas P.G. prepare the report. As a result, the level of accuracy and thoroughness suffers. It is not uncommon to have the wrong geologic unit identified in the ERI report. This frequent occurrence suggests that if the Texas Board of Professional Geoscientists no longer exists to establish the professional credentials of geologists then the accuracy and rigor of geologic reports will suffer.

It is due to the existence of the Texas Board of Professional Geoscientists that studies submitted regarding groundwater quality, such as the identification of pollutants in drinking water or sourcewater areas for public drinking water supply wells, tend to be accurate and complete. If the P.G. license is no longer available to establish the professional credibility of a geologist, then any person may submit work that has the potential to impact public health. An example of how a person lacking geologic skills may impact public health is by failing to recognize subsurface pathways for contaminants to flow within a drinking water aquifer or towards a specific drinking water well. For instance, a person unfamiliar with geologic processes may fail to recognize that a sinkhole or cave located greater than

500 feet distant from a well may convey stormwater runoff to the water well via underground openings within the rock. If polluted stormwater enters the sinkhole or cave, then the drinking water is at risk of pollution. A Texas

P.G. is able to recognize this geologic condition and propose public health protective measures to reduce the risk of water-borne illness.

The Texas Sunset Advisory Commission cited the lack of complaints related to public health as evidence that no public health threat will arise if the Texas Board of Professional Geoscientists no longer exists. I suggest that no complaints have been filed due to the regulatory framework of requiring credentialed geologists to evaluate geologic conditions and data AND to do so for the public interest.

I urge the Texas Sunset Advisory Commission to uphold the responsibility of the state of Texas to protect it's citizens by retaining the Texas Board of Professional Geoscientists.

Any Alternative or New Recommendations on This Agency: The Texas Board of Professional Geoscientists may expand their public outreach to educate the general public about the role of licensed professional geoscientists in protecting public health. This may increase awareness of and appreciation for the scientific knowledge and ethical standards that are currently applied by licensed professional geoscientists to investigations, monitoring, evaluations and plans related to public drinking water supplies.

My Comment Will Be Made Public: I agree