

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, August 16, 2018 7:56:09 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Wednesday, August 15, 2018 11:29 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: Mary Lou

Last Name: Ralls, P.E.

Title: Principal

Organization you are affiliated with: Ralls Newman, LLC

Email:

City: Austin

State: Texas

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

I oppose abolishing the Texas Board of Professional Geoscientists, and I oppose repealing the Texas Geoscience Practice Act. While I am a licensed Professional Engineer, I understand the importance of licensing Professional Geoscientists. Water is the “future gold” in Texas, and to reduce any regulations that help ensure safety to the public’s drinking water is unwise. Geoscientists help ensure contaminants do not infiltrate our drinking water, resulting in improved health and wellbeing for the public regardless of whether complaints have come before the Board.

On page 13 of the Staff Report, the second paragraph states that “a person or entity never licensed with the board would typically raise concerns about qualifications to practice.” I agree wholeheartedly with this statement and believe the Board of Professional Geoscientists should continue to enforce licensure to ensure individuals have the qualifications to practice. I disagree with the sentence in the same paragraph that states the lack of the classification or prioritization of complaints as posing significant harm or high risk to the public indicates “the low level of public harm associated with the profession.” Instead, I believe the nature of geoscience is such that there is less potential to immediately identify whether or not an action posed significant harm or high risk to the public (e.g., potential for a pandemic due to infiltration of pollutants into drinking water could pose significant harm and be a high risk to the public, but not be an immediately identified violation). Because of the nature of geoscience, the continuing education and the obligation to abide by the Board’s Code of Professional Ethics required of licensed geoscientists are even more reason to continue licensure.

The fact that over half the states regulate the practice of geoscience or geology shows the importance of ensuring competence in this profession. Texas should remain a leader with this regulatory Board, and address any shortcomings rather than sunset the Board.

Any Alternative or New Recommendations on This Agency:

I recommend the Texas Board of Professional Geoscientists review the current exemptions and consider eliminating exemptions to the extent possible. I disagree that allowing such a large portion of geoscientists to avoid oversight indicates little need or demand for regulation to protect the public. Instead, I believe it indicates a need for removal of excessive exemptions so that the public is more adequately protected from inexperienced and/or uneducated individuals posing as geoscientists. In consideration of the need for quality drinking water for the public at a time of increasing pollution, exemptions should be severely limited.

I recommend the Board be more knowledgeable of potential enforcement activity. This could be accomplished through education obtained by interaction with Boards of Professional Geoscientists in other states.

My Comment Will Be Made Public: I agree