

**From:** [Sunset Advisory Commission](#)  
**To:** [Brittany Calame](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Wednesday, August 15, 2018 11:14:07 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission  
Sent: Wednesday, August 15, 2018 10:44 AM  
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: Muriel

Last Name: Robinette

Title: Professional Geologist, Senior Consultant

Organization you are affiliated with: New Hampshire Board Member

Email:

City: Concord

State: New Hampshire

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

Whether ASBOG is the right organization to respond/take a position, I don't know...but SOMEBODY with a national perspective of the geosciences should

I do not see any position that ASBOG takes as lobbying, per se, but instead it is EDUCATING and DEFENDING the professional practice of geosciences from a national perspective – the Texas Board would need to do its own lobbying with its own legislature, but could rely upon the national perspectives/data provided by ASBOG

The challenge the geosciences has is that it is less organized than the engineers, who do OVERT lobbying on their own behalf, in state legislatures and heavily in congress

A WHITE PAPER needs to be developed by ASBOG, with input from the State Boards, as to the role of geosciences in identifying and reducing threats to human health and the environment, whether from earthquakes, earth flows/slides, volcanism, and contamination; and argue that junk science is as dangerous as junk engineering, junk medicine etc and that standards, licensing, continuing education, and peer oversight works to raise the standards of practice to ultimately protect the public – expecting government regulators to police the practitioners, in addition to doing their day job, will not happen

The premise that it is adequately protective to the public for geoscientists' work to (just) be “overseen” by individuals in government (who themselves are exempt from professional licensing standards) is short sighted for several reasons: not all geoscience work is reviewed by a government official; government officials are comparing work to general rules and regulations and not able to do technical QA/QC; most government regulators may not even have the technical training or depth to peer review geoscientists work.; most regulatory agencies are not in the business of taking adversarial positions against individual practitioners

Any Alternative or New Recommendations on This Agency: The Texas Sunset Review appears to rely on anecdotal evidence that they identified no “failures” in the geosciences field before licensing, and none have happened since licensing, so therefore licensing is not needed (e.g. it made no change in the statistics)...this may be much more indicative of Texas’

record keeping versus reality. This where a National review by ASBOG (or other national geosciences group) would be helpful, as there would be a much larger pool of incidents to draw from to demonstrate the need for competency in the geosciences. California may make the strongest case with their high hazard seismic mapping and mitigation work by geologists and geophysicists which is so relied upon for road and building construction.

My Comment Will Be Made Public: I agree