

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, August 15, 2018 10:06:48 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Wednesday, August 15, 2018 9:41 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: Barbara

Last Name: Roeling

Title: Environmental Risk Manager

Organization you are affiliated with: Bank

Email:

City: Austin

State: Texas

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

I disagree with the recommendation to abolish the Professional Geoscientist (PG) licensure and associated registration of firms that perform geoscience.

As an Environmental Risk Manager for a large bank in Texas, I require that environmental investigations be performed by licensed PGs when loaning on potentially contaminated commercial property that will be used as collateral.

Geoscience is also performed for commercial developers, brokers, attorneys, buyers and other entities involved in real estate transactions, to know if contaminants in the ground they will be building on will cause adverse health effects from historical use such as former manufacturing operations, gas stations and dry cleaners.

Much of geoscience is interpretive, leaving room for a wide margin of error if not reviewed by a well trained PG. For instance, poor geoscience risks missing cancer-causing chlorinated solvent vapors that may be migrating up from contaminated soil and groundwater from a former dry cleaner when the proposed apartment complex is constructed on top of it. This is just one scenario that is not uncommon when considering the redevelopment of properties.

Additionally, the results of an investigation for a real estate transaction are not typically submitted to a regulatory agency. Yet billions of dollars in transactions rely on good geoscience for the valuation of their investment before property development can proceed. Professional licensure is crucial to provide assurance that the PG's maintain sufficient expertise and accountability, since this work is not overseen by a governmental entity. There can be significant impact to property value and potential liability from human exposure if contamination is not properly assessed by a trained and licensed professional geoscientist. Without licensure there is no accountability and surety of the work product.

Any Alternative or New Recommendations on This Agency:

Although the Board and its agency may struggle to demonstrate its relevance, the license is necessary in the geoscience field. It is highly recommended that the statute be extended, so that the licensure can continue while the board is tasked with determining where the management of the licensure program would best be placed.

My Comment Will Be Made Public: I agree