

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, August 15, 2018 10:42:41 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Wednesday, August 15, 2018 10:38 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: Paul

Last Name: Rydel

Title: Professional Geologist

Organization you are affiliated with: New Hampshire Board member and NHDES Hazardous Waste Remediation Bureau

Email:

City: Concord

State: New Hampshire

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

Having recently become aware of the findings of the Sunset Commission Staff Report on the Texas Board of Professional Geoscientists, and in particular their reported recommendation to abolish the Texas Board of Professional Geologists and repeal the Texas Geoscience Practice Act based on their reported finding that the regulation of professional geoscientists in Texas "...did not provide meaningful public protection," I feel compelled to write to voice my disagreement and comments, which follow below:

My experience relative to professional geologic practice comes from my nearly 35 years of employment as a geologist in the environmental field, with approximately 20 years of employment with New England based environmental consulting firms and about 15 years of employment with the state regulatory agency (New Hampshire Dept. of Environmental Services or "NHDES") in New Hampshire. I have also served on the NH Board of Professional Geologists since 2009, and am a licensed Professional Geologist in New Hampshire. From my experience, I have found licensing of professional geologists to be an important element of professional geologic practice, and offer the following key observations/findings and factual examples in support of my opinion:

- Holding state licensure as a Professional Geologist (PG) provides an important additional differentiator in evaluating candidates for employment, as compared to simply relying on educational experience, college degrees, and a candidate's individual resume and presentation of their experience. College curricula and rigor can vary widely amongst academic institutions offering Geology or Geoscience degrees, and state licensure, which typically involves a standardized nationally-recognized examination relative to both geologic principles and practice, is an important evaluation tool in considering candidates for employment and their capabilities.

- Having been involved with environmental regulation relevant to geologic investigations and testing in New Hampshire over a time period spanning the years prior to and following NH's licensure of Professional Geologists, I offer my observation that licensure has most definitely elevated both the

quality and consistency of geology-related professional services reports submitted to NHDES and, in turn, the level of completeness (and confidence) of any associated findings and recommendations. I see this result as a direct consequence of the educational and experiential thresholds established for PG licensure, as well as the ethical requirements associated with holding such license. As the vast majority of geologic-investigative related reports submitted to NHDES involve assessment of properties for development, identification of receptors, evaluation of groundwater and/or soil quality impacts, and/or assessment of human-health risks associated with various complete or potential routes of exposure, there is of course a direct and tangible benefit/level of protection provided to the general public associated with these reports and the accurate evaluation of environmental conditions.

- Within only the last two years, two NH-licensed Professional Geologists have been the subject of disciplinary action by the NH Board of Professional Geologists (related to their falsification of data and forgery of documentation). Both of these actions were taken in response to complaints submitted to the Board. While a very small percentage of the total population of NH PG's, the benefit to the public of having the state licensure program in place, with its ability to investigate complaints and take disciplinary actions, is obvious. For comparison, a review of the Texas Board of Professional Geologists website lists 35 "Disciplinary Actions" over the same approximately 2-year time frame.

Any Alternative or New Recommendations on This Agency: N/A

My Comment Will Be Made Public: I agree