

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, August 16, 2018 7:49:15 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Wednesday, August 15, 2018 7:34 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: Brenton

Last Name: Sewell

Title:

Organization you are affiliated with:

Email:

City: Austin

State: Texas

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

I disagree with Issue 1 of the Staff Report, that the state regulation of geoscientists provides no measurable public benefit. The geoscience profession directly impacts public welfare in multiple ways, such as flood planning, groundwater quality and remediation, and mapping caverns so homeowners are not endangered by sinkholes in their neighborhood.

The Staff Report suggests that the Texas Commission on Environmental Quality and the Railroad Commission of Texas provide more regular and direct oversight of geoscience work than the TBPG by providing technical reviews of permits applications, monitoring reports, and remediation, and agency staff can work directly with the submitter of any deficient work to correct it.

Project managers for remediation sites come from various educational backgrounds, including biology, engineering, aquatic science, chemistry, environmental science, and even social sciences. While an interdisciplinary workforce is a strength in many ways, many project managers don't have a background in geoscience, and can miss technical issues which would jump out to a PG as errors and deficient work in the reports or applications being reviewed. The majority of those who review remediation reports and permit applications are not geoscientists, and to expect them to ensure quality of geoscience work in place of the TBPG assumes a level of geologic expertise that is not required in their job descriptions.

Any Alternative or New Recommendations on This Agency: Instead of recommending the TBPG be abolished for reasons such as too many geoscientists being exempt (i.e. oil and gas) and not enough disciplinary actions being taken, consider tightening the rules regarding exemption of licensing. The answer to an agency without enough teeth could be to give it better teeth, rather than to abolish it altogether.

My Comment Will Be Made Public: I agree