

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, August 16, 2018 3:05:07 PM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Thursday, August 16, 2018 2:52 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: Michael

Last Name: Thiele

Title: Project Geologist

Organization you are affiliated with:

Email:

City: Richardson

State: Texas

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

This letter is in response and opposition to the Sunset Advisory Commission Staff Report recommendation to abolish the Texas Board of Professional Geoscientists and the Texas Geosciences Practice Act.

In reviewing the staff report, I found that the commission staff's understanding of the purpose and responsibilities of geoscientists and the need for continued regulation to be shortsighted. They found "that professional geoscientists provide valuable assessments and research related to groundwater, subsurface concerns, and other areas." The staff report also stated that "a historical lack of meaningful enforcement action, no measurable impact on public protection, and more direct oversight of geoscientists' work provided by other state agencies' render ongoing state regulation of geoscientists unnecessary to protect the public."

While generally correct, geoscientists in the environmental profession conduct assessments using Human Health Risk-Based Assessment levels which ties into the purpose of protecting the public. These assessments are not just conducted in groundwater but also through the evaluation of soil, sediment, surface water, and air quality.

Admittedly most of these assessments and associated remediation are not conducted directly for the public; however, the results of the assessments and remediation benefit the public by reducing potential exposure to toxic chemicals and providing a cleaner environment, or by allowing for redevelopment that would increase tax revenue which ultimately also benefits the public. In addition, engineering geologists work directly with engineers to evaluate subsurface conditions in an effort to provide a best practical solution for structural design in an effort to avoid "catastrophic events" from harming the public.

Ideally, no complaints should be received by the TBPG. I would like to think that the fact that minimal complaints are received reflects the ethical nature of the professionals conducting the geoscience work and that the purpose of the TBPG is being fulfilled.

The oversight of Geoscience work by the Texas Commission on Environmental Quality (TCEQ) and the Railroad Commission of Texas (RRC) is not feasible and will not improve the quality of individuals or entities that submit

the work.

The TCEQ and RRC are tasked with the evaluation of data submitted to the agencies, they do not have the resources or the authority to provide oversight of the individual or entity conducting the work to determine if the work was done in an ethical and conscientious manner. The TCEQ and RRC rely on the professional geoscientist to provide complete, ethical, and accurate data. The TCEQ and RRC are able to rely upon the professional geoscientist because the TBPG has ensured that the professional has the educational background, continuing education, and ethics required to complete the work.

The Texas Board of Professional Geoscientists and the Texas Geosciences Practice Act are important for maintaining the integrity and ethical standards of Geoscientist working in the environmental, natural resources, and engineering related fields which in turn benefits the health, safety, and welfare of the public and should not be abolished.

Thank you for your time.

Any Alternative or New Recommendations on This Agency: The Texas Board of Professional Geoscientists and the Texas Geosciences Practice Act are important for maintaining the integrity and ethical standards of Geoscientist working in the environmental, natural resources, and engineering related fields which in turn benefits the health, safety, and welfare of the public and should not be abolished.

My Comment Will Be Made Public: I agree