

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, August 2, 2018 2:13:19 PM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Thursday, August 2, 2018 2:07 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: William

Last Name: Turner

Title:

Organization you are affiliated with: WaterBank

Email:

City: Albuquerque

State: New Mexico

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I generally support registration as long as the requirements for registration are uniformly applied, which apparently they are not. The State of Arizona in the last year has significantly curtailed the requirements for registration. In our regulatory world registration should give comfort to regulators that work submitted in compliance with a regulation is competent and believable. Unfortunately, as a registrant with nearly 50 years experience this is commonly not so. One must know that all of the data has been analyzed and that the registrant knows how to analyze and interpret the data. Licensing is only given for one year making registration and onerous process. Other states licenses are valid for 2 years and the National Groundwater Association license is valid for 3 years. Also, it is difficult to satisfy the ethics requirements every year as every type of registration has an ethics requirement but there is no nationwide agreement on what constitutes ethics. I am a founding member of the International Association of Geoethics and none of their programs satisfies the Texas requirement. Finally, I am registered in 8 states and keeping up with the registrations is costly and time consuming.

Any Alternative or New Recommendations on This Agency:

We need a national registration which is applicable throughout the country and which is recognized internationally. ASBOG tests are good start and perhaps the organization can become the national registration hub.

Multi-year registration is desirable

Peer review of work product should be implemented to do away with all of the references. I am so old that most of my colleagues have retired and most of my clients are dead yet I am still productive at 78 and have a 30 page resume to prove it.

An alternative would be a standardized application and renewal form for all states and mutual reciprocity.

My Comment Will Be Made Public: I agree