

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, August 16, 2018 7:50:13 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Wednesday, August 15, 2018 9:25 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: Gilbert

Last Name: Van Deventer

Title: Hydrogeologist

Organization you are affiliated with: TBPG

Email:

City: Odessa

State: Texas

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

Opposed. I hope all of the other PGs feel as I do as to the senseless and unfair recommendation to abolish the TBPG. The Sunset Committee is incorrect in their opinion that PGs don't protect the public. If they feel that way they must abolish licensed engineers for the same reasons they accuse PGs.

1. The "historical lack of meaningful enforcement action" should not be perceived as unnecessary to protect the public. First of all I do not why enforcement of any kind is a prerequisite to protecting the public. There is plenty of meaningful PG work that protects the public, private, and regulatory stakeholders in professional
2. "No measurable impact on public protection". Maybe they're not using the correct instrument to measure with.
3. Direct oversight of geoscientists' work provided by the TCEQ and RRC doesn't include other important agencies like the TWDB, OAG, Groundwater Conservation Districts, and University Lands, to name a few. Let these agencies do their primary job which requires PGs (and PEs) and don't make them do the certification, CEU, morals/ethics, complaints, etc that the TBPG is required to do. It is more productive to allow all the various agencies to utilize the TBPG (and TBPE) to handles these matters and if they have issues they can pass it off to the TBPG (and TBPE).

Apparently the Sunset Review team doesn't understand why we worked so hard to create licensing of our profession, which unfortunately in part was to battle the monopolizing strategy of professional engineers to mitigate competition for work requiring a licensed professional. Please don't ask me to become a PE so that I can get accreditation and get work that requires a PE. My career path has been geoscience, not engineering. There is a difference.

I am one of those geoscientists that is a hydrologist, like so many others.

That is not a specialty that is shared by engineers as much as it is to geologists. I run into many engineers on hydrologic projects and they acknowledge and defer to our professional services.

My license may have been grandfathered but that doesn't mean I didn't earn it when I first received it. The Sunset Review Committee did not acknowledge that despite not taking a test we needed at least 3 recommendations from individuals who were knowledgeable of our work; a college degree in geology or related science (or equivalent work experience); years of experience; and a write-up of why we felt deserving of the license. We took the process very seriously and I don't recall the application being an easy hand-over experience.

And it's the existence of the TWPG that ensures I keep up the training, experience, morals and ethics to keep my license. That is something that protects the public. The Sunset review team did not seem to recognize that the Groundwater Conservation Districts (GCDs) require and/or prefer licensed PGs to perform hydrologic reports and aquifer testing. There are more and more contested hearings for groundwater permits that need to be resolved by qualified and licensed professionals. University Lands is another State agency that requires PGs (and/or PEs) to perform hydrologic reporting.

The Sunset folks did not say one good thing about the TBPG or its licensees which makes them very biased in their findings. Certainly they could have found a few things. In some ways they did but it was always followed by a but this or a but that. There are two sides to the story and now we (PGs) have to fight again to keep our due accreditation and licensure.

Being a PG and being qualified to stamp my work is like a badge of honor and I wear it proudly.

- The licensure of the geologic profession benefits the safety, health, and property of the people of Texas and promotes public welfare by promoting standards for competence and integrity through licensing and regulating the Board's professions.
- Geologists use their professional specialized and scientific knowledge and skills in creative and innovative ways to safeguard Texas' environment, economy, and people.
- The citizens of Texas must cope with the effects, in both dollars and in lives, of natural geologic hazards, such as landslides, earthquakes, flooding, coastal erosion, seawater intrusion, and hazardous minerals.
- A diverse and vigorous geoscience workforce is necessary to protect the citizens of Texas and to ensure resiliency to geologic hazards.
- The unique geology of the state also influences the occurrence of manmade hazards such as abandoned mines, or contaminated soil and groundwater, sinkholes, as well as the mitigation of such hazards.
- An understanding of geology is necessary to meet the goals set by the citizens of Texas with regard to stewardship of the environment, including the responsible management of hazardous and nonhazardous waste, and confronting climate change.
- These benefits are in the fields of geology as related to engineering, groundwater, mineral exploration and development, geologic hazards, the further development of the science of geology, and other geologic matters of concern to the people of the state.
- The history of the State of Texas is closely tied to the geologic riches of the state as well as the geologic hazards that exist within the state.
- The unique geology of the state is the source of the raw materials necessary to create the technologies that help the citizens of Texas thrive, the materials used to build the state's infrastructure, and the source of energy used to power our modern society.
- An accurate understanding of geology is necessary for the success of all engineered structures within the state, including every building or structure, dam, roadway, landfill, levee, and waterway.

- The protection and management of the water resources of the state, both surface and underground, for the beneficial use of its citizens, is dependent upon an understanding of geology and hydrogeology.
- The geologic profession is critical for the responsible development of geologic resources for the benefit of humanity (for example oil and gas, commercial mineral production, construction aggregates, etc.), and the mitigation of the negative effects of such development.
- Geophysics is an important branch of geology that uses natural and induced fields of force to study the earth to provide detailed information in situations where other geologic techniques are inadequate.
- The licensure of the geologic profession adds to the incentive and motivation of students to pursue a degree in geology.

Any Alternative or New Recommendations on This Agency: Same as offered by the TBPG in their self-evaluation.

My Comment Will Be Made Public: I agree