

**From:** [sunset@sunset.texas.gov](mailto:sunset@sunset.texas.gov) on behalf of [Texas Sunset Commission](#)  
**To:** [Sunset Advisory Commission](#)  
**Subject:** Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Thursday, August 9, 2018 9:56:00 AM

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Agency: TEXAS BOARD PROFESSIONAL GEOSCIENTISTS TBPG

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

To Whom It May Concern:

I serve as Research Faculty Fellow in the Office of the Vice President for Research, Professor & BL Allen Endowed Chair of Pedology in the Department of Plant and Soil Science at Texas Tech University. As a practicing geoscientist for almost 20 years, I am writing to register my objection to the proposed discontinuation of the Texas Board of Professional Geoscientists (TBPG). Licensing of professional geoscientist within the state serves as the gold standard by which professionals are measured. In fact, licensing of similar professionals is common in other states and nationwide. For example, the Soil Science Society of America (SSSA) partners with the American Registry of Certified Professionals in Agronomy, Crops, and Soils (ARCPACS) to offer national licensing of geoscientists. I have never pursued licensing from their organization, with deference to my Texas PG license. Nonetheless, licensing is common nationwide in accordance with the best practices and practitioners within the discipline. The finding of the review panel that "history shows no catastrophic event or public harm as the impetus for creating this regulation, nor any documented demand from the public or consumer protection groups for it" is classic retrospection. Ask yourself "moving forward, will the world have more or less demand for use of healthy soils for food production? Does the world face more or fewer instances of pollution of soil resources? Is there more or less likelihood of legal recourse in settling soil-related land disputes?" Who is qualified to address those soil related concerns? As an academician, I can tell you that the importance of grades in courses at a university over the last decade have been supplanted by measures of learning effectiveness. That is, just because a student earns a good grade, does not necessarily mean s/he is proficient in the subject matter. Licensing of PGs is another way for professionals to demonstrate their proficiency in matters of soil or geoscience.

As a current PG license holder, I commonly provide consulting services aside from my academic duties. One of the first questions asked in every deposition

or court testimony is “do you hold licensure as a professional geoscientist?” If licensing was as unimportant as proposed by the Sunset Advisory Commission’s report, why would courts, attorneys, and judges ask about such?

Consider the damage to the Houston area following Hurricane Harvey in 2017. In addition to catastrophic flooding, there were chemical plants that burned and chemicals that were released into environment from the large petrochemical industry of the area. Has the commission asked the public in that area if they would prefer a licensed PG to evaluate the health and safety of their soils or someone who is non-licensed? I would predict that an overwhelming rate of responses would be in favor of licensed PGs to make such determinations.

Back to the comment about a lack of documented demand by the public concerning PGs... Surely the commission realizes that soil is one of the most classically underappreciated natural resources of our planet. Ask 100 people on the street to name our most important natural resources and you would receive responses such as “oil, natural gas, coal, water, etc.” While all of those are important, virtually nobody recognizes the importance of soil. Yet without healthy soil, we don’t grow the cotton to make our clothes, we don’t produce the timber to build our houses, we don’t produce the grain and feed for animals to produce food for our country to eat. There is no greater natural resource than soil. Historically, civilizations have risen and fallen over soil resources. And, if we do not respect historical precedent, we are doomed to repeat it. Just because the public does not shower support for a certain type of professional, that does not diminish the importance of said professional. The public just “assumes” it will be taken care of appropriately. The public assumes that planes will be appropriately routed by well-trained air traffic controllers, the public does not worry about the water coming from their tap because they assume that someone is testing it to be sure it is safe to drink. Similarly, the public may not vocally espouse voracious support for soil or geoscience professionals, but they assume that food will be available, playgrounds will be safe, and soil will be healthy. Just two days ago, I received an e-mail from a mother questioning the safety of her soil because her two sons had fallen ill after playing in their backyard. These issues constantly appear, and qualified, licensed geoscientists are needed to address such issues.

Summarily, I find the proposed disbanding to the TBPG distasteful and a disservice to the citizens of the State of Texas. This is not an agency that consumes large portions of the state budget. Rather, it is a small agency that licenses professionals who oversee the proper use, management, and conservation of one of our most critical natural resources. I earnestly encourage the Sunset Advisory Commission to rescind its recommendation of abolishment of the TBPG.

Sincerely,

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Professor & BL Allen Endowed Chair of Pedology – Department of Plant and Soil Science  
Fulbright Scholar

Any Alternative or New Recommendations on This Agency: Allow the Texas Board of Professional Geoscientists to continue without dissolution.

My Comment Will Be Made Public: I agree