

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, November 9, 2018 8:33:35 AM

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

From: sunset@sunset.texas.gov [<mailto:sunset@sunset.texas.gov>]
Sent: Wednesday, August 29, 2018 4:23 PM
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Wednesday, August 29, 2018 - 16:23

Information submitted to Sunset:

Agency: TEXAS BOARD PROFESSIONAL GEOSCIENTISTS TBPG

First Name: Kemble

Last Name: White

Title: Ph.D.

Organization you are affiliated with: Cambrian Environmental

Email:

City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:
To whom it may concern,

I have practiced as a professional geoscientist in Central Texas since 1999. I am the owner of Cambrian Environmental. My area of practice is the Edwards Aquifer and the various Federal, State and local compliance programs associated with it. I have worked on some of the largest residential subdivisions, commercial developments, and transportation, water supply, wastewater and electrical infrastructure projects in the region.

My work involves conducting field studies on sites proposed for development to identify and characterize geologic features such as caves and sinkholes.

Proper diagnosis of these features is necessary for the aquifer to continue to function and maintain water quality. As the current drought reminds us, water is precious. Every day I work on projects with a nexus to public health and safety. I am currently working on a proposed sewer line in a fault zone next to a major drinking water supply well. If I make a mistake a direct contaminant pathway to our drinking water source may be left unprotected and the quantity of water reaching the aquifer may be reduced.

I worked for years in this area prior to the licensure program and have been licensed continuously since. I saw the quality of work in my field improve dramatically with the licensure program. I know through my own experience and through conversations with the staff of the TCEQ Edwards Aquifer Protection Program (See TAC Chapter 213) that many unqualified bad apples pawned off substandard work prior to the licensure program. Previously anyone

could call themselves a geoscientist. Many aquifer recharge features were insufficiently protected and quite a few homes and other buildings were constructed where they shouldn't have been. The market selected for "geologists" who's investigations produced the highest number of buildable lots. Without the existence of a licensing agency, staff at the TCEQ (and other oversight authorities) were extremely limited in their ability to challenge the credentials of the bad apples. TCEQ staff do not (and never did) have the manpower to effectively provide oversight without the licensure program.

Consider this case study. I am also currently working on the remediation of Cambria Cavern which has been in the news since February when Cambria Drive in Round Rock, Texas collapsed in the middle of the night leaving a 20-foot-deep, 30-foot-diameter hole in the middle of a neighborhood. My staff and I subsequently mapped the un-collapsed extent of the previously unknown cavern which was found to extend under three homes, a natural gas line, the sidewalk and part of the adjacent intersection. The public, the Brushy Creek Municipal Utility District, and the Williamson County Engineer needed this work to be done by highly trained professionals with the accountability that comes with licensure, and not by the bad apples.

The current licensure program provides for reciprocity in licensure with a large number of other states. As a small business owner I would face a financial hardship in pursuing work in those states if I had to first seek licensure to legally provide services there.

I believe that the lack of higher order legal consequences for violators of the act is primarily a consequence of good, effective regulation and the wisdom of the Board. I believe that the majority of the bad apples have been swept out or reformed.

For these reasons and many others which I would be happy to discuss I oppose the discontinuation of state regulation of geoscience. Thank you for your consideration.

Respectfully,
Kemble White Ph.D., P.G.

Any Alternative or New Recommendations on This Agency: I believe this program works well the way it is.

My Comment Will Be Made Public: I agree