

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, August 10, 2018 9:48:22 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Friday, August 10, 2018 9:00 AM
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: Kenneth

Last Name: Tramm

Title: General Manager

Organization you are affiliated with: Modern Geosciences

Email:

City: Colleyville

State: Texas

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

Thank you for the opportunity to provide comment on the Sunset Staff Report concerning the TBPG (2018–2019; 86th Legislature). As a founding principal in a Texas firm focused on solving environmental problems (Registered Professional Geoscience and Professional Engineering Firm in Texas), a practicing Professional Geoscientist (License No. 805) with over 20 years of experience, and member of boards at Texas A&M University and University of Texas at Arlington, I feel I have some insight that should be considered.

First - I completely disagree with the Staff Report and recommendations. The PG licensure has resulted in environmental professionals now having a requirement to take annual ethics training and continuing education to maintain licensure. This alone has resulted in an elevation of the practice and improved the work I see from colleagues and peers. To believe Texas would be better off without this is ridiculous.

While I agree that significant portions of geoscientific practice do not currently require licensure due to the license coming into a pre-existing marketplace concerning oil and gas and engineering, it has continued to grow in relevance. The market has embraced the PG licensure as a standard to confirm individual consultants have a specific background, skill set, and ethical requirements. To rely exclusively on the TCEQ for this was not successful prior to the TBPG nor would it be after. The TCEQ and RRC are the most likely agencies to judge quality changes since their 2004 requirement that certain reports be sealed. In preparation for this response I visited with several staff there I interact with to gain their perspective. All confirmed the PG licensure had improved compliance with their rules, resulted in better assessment of contamination, and overall created an improved level of professionalism in the care for environmental work. Further, several suggested that risks that currently unaddressed by our older regulations that require updating (30 TAC 350) were now bringing to the attention of the TCEQ when actual risk previously unassessed was present (e.g., Vapor Intrusion).

This would not be happening as effectively without the PG license. In its absence, we would have lesser quality

practitioners and more risk would be left for Texans to address in the future.

Looking for a disastrous event to mark the need for the TBPG or to find a disaster avoided is not appropriate for the type of risk typically addressed in the environmental community. As a native Texan, proud Texas PG, business owner, resident, and tax payer, I ask you reconsider the dissolution of the TBPG as it is vital today, but will be indispensable to us in the future.

Please contact me if I may be of further help.

Any Alternative or New Recommendations on This Agency: Keep the TBPG. Texas is unique in the consideration of disciplines within the PG licensure. This is something to support and embrace. Working with the TCEQ there should be consideration of an Environmental discipline.

My Comment Will Be Made Public: I agree