

**GOVERNING BOARD  
OREGON DEPARTMENT OF GEOLOGY AND MINERAL INDUSTRIES**

**June 24, 2025  
8:30 a.m. (note: public portion begins at 9:35 a.m.)**

**Teleconference Public Meeting Agenda**

This public meeting will be conducted as a virtual meeting. Written testimony can be submitted in advance, but no later than 2:15 p.m. on the meeting day to [lori.calarruda@dogami.oregon.gov](mailto:lori.calarruda@dogami.oregon.gov). Written comments received will be distributed to the Board.

**Dial: 1-253-215-8782**

**When prompted, enter ID number: 828 8107 4417**

**If prompted for a Password: 593821**

The Board makes every attempt to hold strictly to the sequence of the distributed agenda. Times and topics may change up to the last minute. This agenda is available on the DOGAMI website: [www.oregon.gov/dogami](http://www.oregon.gov/dogami).

<b>8:30 a.m.</b>	<b>Item 1:</b>	<b>Call to Order</b> – Chair Linda Kozlowski
<b>8:35 a.m.</b>	<b>Item 2:</b>	<b>Executive Session</b> – Annual Director Review  Board Action: The Board will be asked to consider an action on this item
<b>9:35 a.m.</b>	<b>Item 3:</b>	<b>Return to Public Session</b>
<b>9:40 a.m.</b>	<b>Item 4:</b>	<b>Introductions</b> – Chair Linda Kozlowski and Staff
<b>9:45 a.m.</b>	<b>Item 5:</b>	<b>Annual Director’s Evaluation</b> – Chair Linda Kozlowski  Board Action: The Board will be asked to take an action on this item
<b>9:55 a.m.</b>	<b>Item 6:</b>	<b>Review Minutes of March 25, 2025 Board Meeting, and May 23, 2025 Special Board Meeting</b>  Board Action: The Board will be asked to take an action on this item
<b>10:00 a.m.</b>	<b>Item 7:</b>	<b>Financial Report</b> – Steve Dahlberg, Chief Financial Officer  Board Action: The Board will be asked to take an action on this item
<b>10:20 a.m.</b>	<b>Break</b>	
<b>10:30 a.m.</b>	<b>Item 8:</b>	<b>Legislative Update</b> – Christina Appleby, Legislative Coordinator and Geologist  Briefing: The Board will not be asked to take an action on this item
<b>10:45 a.m.</b>	<b>Item 9:</b>	<b>Budget Update</b> – Ruarri Day-Stirrat, Director, and Steve Dahlberg, Chief Financial Officer  Board Action: The Board will not be asked to take an action on this item
<b>11:15 a.m.</b>	<b>Item 10:</b>	<b>MLRR Update</b> – Sarah Lewis, MLRR Program Manager  Board Action: The Board will not be asked to take an action on this item
<b>11:30 a.m.</b>	<b>Item 11:</b>	<b>GS&amp;S Update</b> – Jason McClaughry, GS&S Program Manager  Briefing: The Board will not be asked to take an action on this item
<b>11:40 a.m.</b>	<b>Break</b>	
<b>12:00 p.m. (noon)</b>	<b>Item 12:</b>	<b>MLRR Process Audit Report</b> – Ruarri Day-Stirrat, Director, and Sarah Lewis, MLRR Program Manager  Briefing: The Board may be asked to take an action on this item

- |                  |                 |   |
|------------------|-----------------|---|
| <b>2:00 p.m.</b> | <b>Item 13:</b> | <b>Confirm Time and Date for next meeting</b>   |
|                  |                 | Board Action: The Board may be asked to take an action on this item                                       |
| <b>2:10 p.m.</b> | <b>Item 14:</b> | <b>Public Comment</b>   |
|                  |                 | Only <u>written comments</u> received prior to or by 2:15 p.m. on the day of the meeting will be accepted |
| <b>2:15 p.m.</b> | <b>Item 15:</b> | <b>Board Adjourn</b>  |

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**PLEASE NOTE**

**AGENDA**

The public portion of the Board meeting will begin at 9:35 a.m. and proceed chronologically through the agenda. Times listed on the agenda are approximate. At the discretion of the chair, the time and order of agenda items—including addition of intermittent breaks—may change to maintain meeting flow.

**PUBLIC TESTIMONY**

Only written comments will be accepted.

**REASONABLE ACCOMMODATION OF DISABILITIES**

Please contact us at least 48 hours prior to the meeting to let us know if you need reasonable accommodations. Contact the Director's Office at (971) 673-1555 to make your request.

# Staff Report and Memorandum

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To: Chair, Vice-Chair, and members of the DOGAMI Governing Board

From: Linda Kozlowski, Governing Board Chair

Date: June 16, 2025

**Regarding: Agenda Item 5 – Annual Director’s Evaluation**

The Board will take action on the Director’s Annual Evaluation.

***Proposed Board Action: The Annual Director’s Evaluation will be accepted as discussed in the Executive Session.***

# Staff Report and Memorandum

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To: Chair, Vice-Chair, and members of the DOGAMI Governing Board

From: Lori Calarruda, Executive Assistant

Date: June 17, 2025

**Regarding: Agenda Item 6 – Review Minutes of March 25, 2025 Board Meeting and May 23, 2025 Special Board Meeting**

Attached are draft Board Minutes from the March 25, 2025 Board Meeting and May 23, 2025 Special Board Meeting.

***Proposed Board Action: The Board Minutes of March 25, 2025 Board Meeting and May 23, 2025 Special Board Meeting be Approved/Approved as Amended/Not Approved.***



**GOVERNING BOARD MEETING MINUTES  
OREGON DEPARTMENT OF GEOLOGY AND MINERAL INDUSTRIES**

Tuesday, March 25, 2025

8:30 a.m.

Virtual Public Meeting

**1) Call to Order:** (Linda Kozlowski, Board Chair)

Chair Kozlowski called the meeting to order at 8:33 a.m.

**2) Introductions:** (Linda Kozlowski, Board Chair, and Staff)

Chair Linda Kozlowski, Vice-Chair Anne MacDonald, Board Members Tiffany Thomas, and Ruth Dittrich were all in attendance via Zoom video/phone. Board Member Diane Teeman was not in attendance.

Department of Geology and Mineral Industries (DOGAMI) Staff in attendance:

Ruarri Day-Stirrat – Director/State Geologist

Lori Calarruda, Recording Secretary/Executive Assistant

Alex Lopez, Public Affairs Coordinator

Sarah Lewis, MLRR Program Manager

Steve Dahlberg, Chief Financial Officer (CFO)

Christina Appleby, Legislative Coordinator and Geologist

Others in attendance:

Diane Lloyd, Department of Justice (DOJ)

**3) Review Minutes of December 12, 2024 Board Meeting:**

Chair Kozlowski asked if there were any changes to the minutes as presented. No changes.

Board Action: **Thomas moved to approve the minutes of December 12, 2024 Board Meeting as submitted. MacDonald seconded. Yes Votes: Kozlowski; MacDonald, Thomas; Dittrich. Motion carried.**

**4) Financial Report:**

Steve Dahlberg, Chief Financial Officer, presented the DOGAMI FY2025 Budget Status Report, as of January 31, 2025, for the Geological Survey and Services (GS&S) and Mineral Land Regulation & Reclamation (MLRR) programs. The Board Packet contained the financial actuals, graphs, and projections.

Dahlberg said the numbers look similar to the previous Board Meeting, but have been updated with the actual expenditures. He reviews what the Agency actually spends, normal occurring expenses, what is coming in, and what could be on the horizon that he needs to plan or reserve budget capacity for.

19 DOGAMI's General Fund expenditure budget is \$7.8M with projected biennium expenditures  
20 expected to be \$7.5M, resulting in the Agency being \$250,000 underbudget. Expenditures include  
21 new equipment and projects that required match, such as USGS STATEMAP, Data Preservation,  
22 Landslide, and Earth MRI. The Other Funds single largest funding came from the Private Forest  
23 Accord, but is also made up of other State Agencies and several universities. There are currently  
24 thirteen active Other Funds grants, which several are multi-year grants; currently there are no active  
25 Lidar projects. For Federal Funds, there are currently sixteen active Federal grants. Recently two  
26 FEMA grants were closed out and two will be closing out before the end of this calendar year. There  
27 are four Lidar projects that are finishing up. Federal grants make up approximately 70% of the  
28 Federal revenues, which are the ones requiring staff to do the work, versus Lidar grants, where the  
29 Agency pays the bulk to a vendor. The Agency has been awarded the USGS Landslide Grant and is  
30 awaiting decision on additional different USGS grants that have been submitted.

31  
32 MLRR Other Funds revenue is strong due to good production, renewal fees new permit fees and the  
33 DEQ Water Quality fees. The 6-month Operating Reserve has dropped to almost 90% of the target  
34 amount due to higher than anticipated professional services and legal costs. The projections were  
35 put together 2.5 years ago, and take into consideration what the Program thinks might happen, but  
36 not to this amount. MLRR continues to look for ways to address the high permit application load,  
37 that includes hiring a limited duration position to help.

38  
39 Dahlberg shared the 2023-25 General Fund Utilized Budget graph, which is a representation of the  
40 burn rate of the General Fund dollars that shows a little bit of money will be left and reverted back to  
41 the General Fund. He reviewed and explained graph details for the GS&S Grants 2019-28, stating  
42 DOGAMI is working with a new tool that helps allocate staffing to the different projects out into the  
43 future that is great for planning.

44  
45 Dahlberg briefly went through additional slides that are in the Board Packet. He stated the big drop  
46 in Federal Funds is due to the Agency not receiving the Lidar projects that were anticipated from the  
47 prior biennium. In speaking with other managers, Lidar tends to go in cycles. It is currently in a down  
48 cycle and will probably pick up in the future. MLRR's new total of \$5.9M is due to the \$750,000  
49 increase approved in the December E-Board. As for ePermitting, DOGAMI is in the vendor contract  
50 negotiation stage and is making progress moving forward. The Agency will be utilizing the DEQ  
51 Project Manager and Business Analyst.

52  
53 In closing, he stated the Agency is doing well and is on track with all of its tracking and analysis.  
54 There was a little hiccup with the Federal grants, but DOGAMI is navigating the Federal funding  
55 issues. The Agency is in the budget process and keeping open communication with the LFO, CFO,  
56 DAS, and the Governor's Office.

57  
58 Thomas asked which grants were at issue and is there any indication that funding is at risk. Day-  
59 Stirrat stated he was going to provide an update during his section and asked to answer it then.

60  
61 Chair Kozlowski said it was an excellent report, well documented and very informative.

62  
63 Board Action: **Thomas moved to accept the Budget Status Report as presented. MacDonald**  
64 **seconded. Yes Votes: Kozlowski; MacDonald, Thomas; Dittrich. Motion carried.**

66 **5) Director's Report:**

67 Ruarri Day-Stirrat, Director & State Geologist, provided a brief update on the Agency.

68  
69 Agency Update

70 Day-Stirrat discussed the Federal Grants being locked and the Agency being unable to access them  
71 through the Treasury website. Department of Justice (DOJ) and the Governor's Office worked to help  
72 get them reinstated. There are now issues with DOE and FEMA being closed off. They are now  
73 following the same action through DOJ and the Governor's Office. There are several grants that are  
74 in a Notice of Intent to Award with US DOE that the Agency has not received any communication  
75 from those programs yet. The grants the Agency has been told it will receive have not begun  
76 contract negotiations. The loss of access to the previous grants was around the language related to  
77 diversity, equity, and inclusion (DEI) and Environmental Justice that was required to be put into the  
78 grants to be successful, and those were asked to be removed, which was not consistent with the  
79 contracts already signed. Going forward, the Agency will continue to use the process already in place  
80 to evaluate new grants to decide whether to apply for them.

81  
82 New grant opportunities continue to be explored. There is a larger opportunity the Agency is  
83 currently exploring around geothermal with US DOE. Also, a multi-state Geological Survey group has  
84 met and is going to attempt to put a portal together to integrate data across the entire Western US,  
85 with Utah leading the effort and all Western States to Pacific participating.

86  
87 Strategic Plan Update

88 The Department of Administrative Services (DAS) has asked agencies to update their plans. The  
89 Agency will review the Strategic Plan and come back to the Board in June to request any updates.  
90 Day-Stirrat believes it is more of an exercise to discuss what progress has been made against the  
91 goals set.

92  
93 DOGAMI Budget/POPs/Fee Bill Discussion

94 In early February the Agency presented the Governor's Recommended Budget (ARB) to the Natural  
95 Resources Subcommittee. The second day there was comment and testimony on the Agency's  
96 budget. Most comments were positive, with the exception of the Oregon Concrete and Aggregate  
97 Producers Associations (OCAPA).

98  
99 The House Committee on Agriculture, Land Use, Natural Resources, and Water requested an  
100 informational session on geologic carbon sequestration, that was scheduled for 20 minutes but went  
101 for 65 minutes. It was an engaged conversation where the Committee members honed in on all the  
102 key issues and they were able to discuss it. Day-Stirrat mainly presented, but was joined by Director  
103 Walker from the Department of State Lands (DSL).

104  
105 The Agency also presented the MLRR Fee Bill, SB 836. It is being moved to the Rules Committee with  
106 no recommendation. OCAPA has requested a process audit be done before they will take any  
107 particular position on the Fee Bill. The audit was requested on December 19, 2024. The MLRR  
108 Program is in the middle of the process audit, and the final results are expected on April 11, 2025.  
109 Due to the audit survey being sent to permittees and applicants, the normal Customer Service Survey  
110 will not go out and it will be noted in the KPMs.  
111

OCAPA has presented a competing fee bill with no numbers associated with it, but it does not include the drilling programs, so everything the Program needs to be done is not covered. The Agency needs to ensure that surface mining, oil, gas and geothermal are all looked after in equal measure.

OCAPA has introduced a policy bill that seeks to remove a certain amount of agency regulatory authority, with three buckets that are largely placeholders. The Agency is engaged in a conversation with that group around potential legislative changes.

It has been an extremely disruptive period with the grant situation due to the Agency being dependent on the Federal Grants. The Agency has been able to navigate a pathway to the end of the biennium due to the work CFO Dahlberg has done in handling the budget.

Thomas asked if it was a wholesale pause on budgets under that funding program or was it specifically targeted to any particular funding or project. Day-Stirrat said initially all grants had been removed, then slowly certain grants back into the system, and the Agency had to check daily to see what was available and what was not. The Department of Interior (DOI) grants are open at the moment, but the FEMA grants are still closed, the Agency anticipates those grants will come back.

Vice-Chair MacDonald asked about OCAPA's interest in removing some of the Program's regulatory authority; what authority they wanted to remove, moving them to a different agency, or removing the regulation altogether. Lewis said the bill introduced is meant as a placeholder, but has three specific key things.

The first one is to simplify the transfer application for operating permits to exclude anything but the business side of the transfer. She explained the additional oversight and review of the permit potential site inspection is written in rule, which the Board sets, and the statute mentions there should be additional rules made around that. MLRR has worked with OCAPA on a potential fix that does not change statute and retains the Program's rule authority around transfers.

The second one is to exclude certain drilling from Exploration Permits when it is done by a water well driller, which would in effect remove a permit process prior to drilling. MLRR has proposed the development of a standalone drilling program with just two staff completely covered by drilling program fees, will address the backlog around Exploration Permits.

The third is around the Consolidated Application for Chemical Process Mining, and the requirement for a Land use Compatibility Statement for certain actions, which DOGAMI does not require for things. She believes this is more targeted at some of the other partners and the balance between Federal authority and State authority on State lands. The State does retain authority for mining on State lands, even if there is no Federal process. The State would continue MLRR's rigorous processes under the current regulations, even if there was not any Federal oversight. Vice-Chair MacDonald asked if DOGAMI is working with DEQ on this topic. Lewis answered DEQ is aware of the write-in around well drillers, and Water Resources as well.

Chair Kozlowski asked Day-Stirrat how he is communicating the issues to staff during this stressful situation. Day-Stirrat said weekly grant meetings have been happening that inform staff of everything that is going on, what actions the Agency has taken, the actions happening at the State level, and where things are now. Kozlowski asked about the morale of the staff. Day-Stirrat replied it

is cautious, but they are very focused on their work and delivering on the promises they have made. Kozlowski said communication at a stressful time is critical.

Chair Kozlowski asked about the impact to carbon sequestration and where it stands at this point. Day-Stirrat said he believes it will continue, just the funding portion may change.

Chair Kozlowski congratulated Leadership and staff, stating the financial reports are excellent and staying on top of the issues during this really critical time; kudos to everyone for what they are going through right now and keeping everything focused on what is important.

Dittrich asked Day-Stirrat how he feels about the awards the Agency has received Notification of Award for but have not signed the Grant Agreements. Day-Stirrat said he believes the grants will be successful, they may just need to change a little bit.

Briefing: **No Board Action Required.**

#### 6) Legislative Update:

Christina Appleby, Legislative Coordinator and Geologist, provided a Legislative Update.

Appleby started by framing the big picture around the legislative process. The Legislative Session is over 1/3 of the way through, it started in late January and ends at the end of June. There were 3,393 bills introduced this year, which is a record number in the Legislature. There are deadlines throughout the process that bills need to meet to stay “alive” and continue to move forward to potentially become law. She briefly explained the bill process. The deadline for introduction of new bills has passed, and last Friday first committee work sessions needed to be scheduled and posted online. There are roughly 2,000 of the 3,400 bills listed as active in the system. April 9th is the next key deadline, where committees need to have the initial work session actually held. Bills moved over to rule takes them out of the timeline of deadlines, so it can remain alive.

DOGAMI’s Budget Bill was presented to a joint committees, therefore it is exempt of the timeline of deadlines. The informational session and public hearing took place in early February, the next step is to have the work session scheduled within the next two months to keep the Budget Bill moving forward.

Bill package HB 3492, was introduced by a legislator and not coming from DOGAMI, is for DOGAMI to complete a study of earthquake induced toxin inhalation, statewide. She briefly explained the reason behind the bill. It has made it through its public hearing and work session. Since this is not the normal practice of geology, it is something the Agency would work in partnership with one of the State universities to bring in external expertise on. It would be additional workload for the Agency.

Appleby is keeping track of other bills outside of the Agency that are relevant but do not necessarily directly impact DOGAMI but are of interest.

Chair Kozlowski asked if the tsunami earthquake bill is being funded. Appleby said it is a conversation the Agency is actively having with the Legislative Fiscal Office (LFO) to ensure adequate funding is going to be provided from the legislature so the work can be completed. The goal is to not have unfunded new work added to the Agency’s plate. Kozlowski asked if DOGAMI will partnering with

OEM on this particular bill. Appleby said there is a small role for the Department of Emergency Management within the bill and explained briefly how the report would be reviewed.

MacDonald asked if DEQ is tracking this bill as well, since it deal with air releases. Appleby said they were aware of it and would probably want to use the datasets after they are produced.

Briefing: **No Board Action Required.**

## 7) MLRR Update:

Sarah Lewis, MLRR Program Manager, provided an update on MLRR.

### Permit Status Summary

Lewis stated the application workload is holding steady and they are issuing permits at a pretty good clip. She reviewed the Workflow Chart, stating of the 83 active applications for surface mining, 28 are with DOGAMI in various stages of progress and 55 have been returned to applicants for revision. Thirteen new applications have been received since December. In addition to issuing permits, staff work to close sites out/down, two sites have been closed down in the last 3 months. Staff are also beginning to focus on withdrawals, which are applications where the process has either stalled out or stop and are not able to move forward at this time, so they have been withdrawn. In statue and rule there are timelines for the Agency to review materials and for applicants to respond. DOGAMI is not holding applicants to the short timelines, but after 12 months of no forward movement, the Program is withdrawing the application. This does not apply to applications that are mandatory due to a compliance issue. The next quarter staff will focus on identifying those applications ready to be withdrawn from active status. A long list of withdrawn applications is expected, but many will be moved back into the Pre-Application bucket.

Chair Kozlowski asked if the withdrawals are coming from the audit process. Lewis said no, this conversation started last year. Staff have been trying to contact the applicants but have not received responses back. Two applicants have received withdrawal letters and they reached out and asked for Pre-Application meetings. She added that with the current process of the Pre-Application meetings and initial Completeness Review, the Program is starting to see an improvement in the quality of materials received. She feels if they address some of the older applications that did not go through that process, getting them back in the queue will put them in a better position to move them forward in a timely manner.

One Suspension Order was issued in February for Mining Without a Permit (MWOP), this was in coordination with Umatilla County. This was the first Suspension Order in almost 2 years. There were four Civil Penalties for late payments. There is no significant update for the Mining Without a Permit Civil Penalty cases. One was closed in the fall, and they are still waiting for the Administrative Law Judge decision on the Eckroth case, which is anticipated this week.

### Grassy Mountain

The Grassy Mountain Project is still in the Permit Drafting Phase, which is a 220 day cycle. It is anticipated by mid-May the permitting agencies and cooperating agencies will submit their permits and conditions to DOGAMI, which the Agency will construct an overarching consolidated permit. On March 3, 2025, the Technical Review Team (TRT) finalized the list of best available practical necessary technology, which has been shorted to Best Tech for the project. This actually supports the drafting

of the permits by setting what the State is going to require as the appropriate technology for this project. This is another milestone for the project. The applicant is also very cooperative in the process, and the applicant is happy to add the additional measures recommended by the State to their plans.

Chair Kozlowski asked how long this has been in process and if there is an estimated time the process should be completed. Lewis said technically the time clock ends on October 1, 2025, which is the time the Agency would need to issue a Final Permit. However, the Program is still closely coordinating with the Federal process and they are not as far along as originally anticipated. The State is committed to working on issuing the draft Consolidated Permit, but there are aspects of the State process that requires Federal concurrence. In order to issue a Final Permit, a record of decision by the Federal Government for their portion of the project is needed. If that is delayed, DOGAMI cannot issue the Final Permit. There are also environmentally related portions of the process the Federal Government is doing, that the State is relying on, which DOGAMI has deferred the State action to accept the Federal decision. If the Federal process does not include that piece, the Agency will have to work with the applicant on how to fulfill that need on the State side. The Program is in close contact with the applicant and have already started these conversations.

#### ePermitting

The kick-off meeting with the project team took place last week. MLRR did receive approval for special procurement with the selected vendor, which is the same vendor DEQ is using, and the contract negotiations have begun. Lewis will have more timeline specifics at the next Board Meeting. This will improve the process efficiency on the administrative side and customer service part of the Program for payments, renewals and Public Record Requests, but it will not reduce the application backlog. The timeline still is about 18 months to 2 years out.

#### Permit Process Audit

Lewis stated the Agency decided to do the audit to find out if there are things the Program could be doing that would improve process proficiency. The scope that was developed was twofold, process efficiency and risk assessment. She reviewed the scope of the audit request, which included identifying risks related to noncompliance inefficiencies or process bottlenecks. At the end, the vendor is going to provide actionable recommendations to address the identified risks, which will be a report and potentially an implementation plan. This is not a short term fix and is something that is going to take years to accomplish.

Chair Kozlowski asked if in the process of interviewing staff, was there anything that could potentially be an issue. Lewis said they kind of gave an overview of areas they have identified that are of interest, but did not discuss what the solutions might be yet. They definitely have some new insights, but no major surprises. Kozlowski stated this is a good thing and it is going to be beneficial in the long run.

Vice-Chair MacDonald asked if they are looking at possible places for supplementing staff efforts with AI. Lewis said she believes it is something they are reviewing.

Briefing: **No Board Action Required.**

#### **8) GS&S Update:**

300 Director Ruarri Day-Stirrat, provided the GS&S program update.

301  
302 Publications:

303 Day-Stirrat stated there were 20 publications in 2024, which is close to an all-time record, and there  
304 are 4 so far this year, with another 7 already in preparation. He highlighted two recent reports that  
305 were published. The first publication he discussed was the Ebola State Park Landslide Risk Analysis.  
306 This work was funded by the Department of Parks and Recreation. It deals with infrastructure  
307 resilience at Ecola State Park. He pointed out the plates published in the report are truly excellent  
308 and the cartography is really great. The second report is the Multitemporal LIDAR Analysis of Pre-  
309 and Post-Eagle Creek Fire Debris Flows, Western Columbia River Gorge, Hood River and Multnomah  
310 Counties, Oregon. It is Special Paper 55 (SP-55) by Bill Burns, where he uses multi-year Lidar to track  
311 changes. The Agency thinks this is a methodology that could be deployed nationally, and it was a  
312 collaborative effort between FEMA, USGS, University of Oregon, and ODOT. The recent press release  
313 on the report included a positive comment from the Governor around the study and the advances in  
314 technology the Agency and others are deploying.

315  
316 Grants:

317 The original STATEMAP project proposal of \$1.6M was asked to be reduced/downgraded to \$500,000  
318 for the Federal portion, due to timing issues with how grants are administered in the Federal  
319 government, so the total project will now be \$1M. The quadrangles that will not be done this year  
320 will be moved into next year. Part of the proposal includes quaternary fault mapping to update  
321 recent fault history. The USGS Data Preservation proposal was successful. This is significant because  
322 it was the first Federal grant for a junior staff member, and it was awarded. A second USGS National  
323 Landslide Hazard Program Grant, in the amount of \$100,000 with matching requirements, was  
324 successful. The Landslide Program has not received legislative support with State appropriations, so  
325 the Agency's strategy is building the program from the bottom up using Federal funding and interns  
326 mentored under Bill Burns, who is a national expert. It is highly likely the Agency will receive another  
327 Earth MRI mapping grant, this time for the Cornucopia Mining District in Baker County. The USGS  
328 requested start date for this grant is November 2025, which the Agency agreed to accommodate;  
329 there is likelihood of success for receiving this grant. DOGAMI has received over a \$1M for four  
330 grants over the last 2 years. There are two DOE grants in the Notice of Intent to Award stage the  
331 Agency is still waiting for a decision on. One is about \$400,000 for DOGAMI, that is related to cores  
332 being held at Oregon State University, and the second is the Carbon Ore, Rare Earth, and Critical  
333 Minerals Initiative, led by the University of Alaska Fairbanks.

334  
335 Thomas asked about the scope of the FEMA grant. Day-Stirrat said they are front loaded with a pre-  
336 application meeting before the Notice of Proposal is sent out. He explained the process and said  
337 they require Legislative approval to submit the proposal.

338  
339 Outreach:

340 DOGAMI took part in a Career Fair at PSU. Day-Stirrat acknowledged Lopez and Calarruda for putting  
341 together professional outreach material for the Agency.

342  
343 Bill Burns has been accepted into the National Federal Advisory Committee on Landslides. This is  
344 part of the National Landslide Preparedness Act.

345  
346 Chair Kozlowski said it is excellent for Burns and he has done amazing work, so to be recognized  
347 nationally is outstanding. She is pleased and amazed at how well the Agency is doing with the grant



348 applications given the environment. She believes it is driven by being proactive and making sure the  
349 Agency is on target, and thinks staff have done an exceptional job along those lines.

350  
351 Briefing: **No Board Action Required.**  
352

353 **9) Confirm Time and Date for Next Quarterly Meeting and Board Retreat/Special Meeting (May 23,**  
354 **2025):**

355 Chair Kozlowski stated the next DOGAMI Board is currently scheduled for Tuesday, June 24, 2025 at  
356 8:30 a.m. – 1:00 p.m. in Portland or via Zoom. She confirmed this date is still acceptable for the  
357 Board.

358  
359 The Board Retreat and Special Meeting are currently scheduled for Friday, May 23, 2025.  
360

361 MacDonald asked if the Governor's Office has worked with agencies to build contingency strategies  
362 for some of the Federal grants where the rug can be pulled out from under them. Day-Stirrat said  
363 this would be a great topic to defer to the Board Retreat.  
364

365 **12) Public Comment:**

366 Only written comments received prior to or by 10:50 a.m. on the day of the meeting were to be  
367 accepted. Chair Kozlowski asked for any written public comments. No public comments.  
368

369 **13) Board Adjourn:**

370 Chair Kozlowski adjourned the meeting at 10:14 a.m.

371  
372 APPROVED  
373

374  
375  
376  
377 \_\_\_\_\_  
378 Linda Kozlowski, Chair

**GOVERNING BOARD SPECIAL MEETING MINUTES  
OREGON DEPARTMENT OF GEOLOGY AND MINERAL INDUSTRIES**

Friday, May 23, 2025

12:45 p.m.

Hybrid Teleconference Public Meeting

**1) Call to Order:** (Linda Kozlowski, Board Chair)

Chair Kozlowski called the meeting to order at 12:51 p.m.

**2) Introductions:** (Linda Kozlowski, Board Chair and Staff)

Chair Linda Kozlowski, Vice-Chair Anne MacDonald, and Board Members Diane Teeman, Tiffany Thomas, and Ruth Dittrich were all in attendance.

Department of Geology and Mineral Industries (DOGAMI) Staff in attendance:

Ruarri Day-Stirrat, Director/State Geologist

Sarah Lewis, MLRR Program Manager

Lori Calarruda, Recording Secretary/Executive Assistant

Alex Lopez, Public Affairs Coordinator

Steve Dahlberg, Chief Financial Officer (CFO)

Jason McClaughry, Interim GS&S Program Manager

Cari Buchner, Mining Compliance Coordinator

Laura Gabel, KPM Coordinator and Coastal Field Geologist

Christina Appleby, Legislative Coordinator and Geologist

Others in attendance:

Diane Lloyd, Department of Justice (DOJ)

Nathan Karman, Department of Justice (DOJ)

Peggy Lynch – League of Women Voters

**3) Civil Penalties:**

Sarah Lewis, MLRR Program Manager, and Cari Buchner, Mining Compliance Coordinator presented the Civil Penalties.

Lewis provided an update on the Ekroth Quarry, a Civil Penalty case for Mining Without a Permit and Trespass that has been going on since 2022. She briefly reviewed the case details. The Board approved a Civil Penalty in December of 2022 and in September of 2023 the respondent requested a Contested Case that DOJ facilitated a referral to the Office of Administrative Hearings. There was no interest in negotiation around the Civil Penalty. The hearing was held in July and August of 2024, and the Administrative Law Judge issued a Proposed Order in March of 2025. The respondent has not filed any exceptions to the Proposed Order; therefore, the Program is asking for approval to issue the Final Order. In the Final Order, the Administrative Law Judge upheld all nine assertions of the Department with no exceptions. Those include: revoking of Operating Permit; liable for paying Civil Penalties \$426,000 in total civil penalties; requirement that all surface impacts be reclaimed, including restoring the ODF property to stable condition that meets MLRR requirements, and this

16 must complete within 1 year after issuance of the Final Order. This is a very important milestone as it  
17 sets case law to some extent, and the Program's authority to be assessing Civil Penalties for these  
18 types of egregious violations. Lewis requested the Governing Board approve the Department's  
19 issuance of Final Order in the form she provided as Exhibit 1, which adopts and incorporates the  
20 Administrative Law Judge Proposed Order as Final Order.

21  
22 Chair Kozlowski asked if there has been any communication with the respondent. Karman answered  
23 he received contact from opposing counsel exploring if there is still a possibility of settlement. He  
24 replied back to them that it is late in the game, but did not foreclose that as an option and the  
25 Department intended to move forward with the Final Order process. Even with the Final Order, if it  
26 makes sense, some settlement discussions could take place.

27  
28 Thomas asked if a reclamation plan had been submitted. Buchner said different versions have been  
29 submitted, but only about half of one has been approved, as the consultant who wrote the plan is no  
30 longer working with the respondent; a new consultant has been introduced they hope will be able to  
31 finish what was started. Thomas asked what the scope of the plan is. Buchner replied reclamation of  
32 Ekroth Quarry, and laying the sloping back to meet minimum standards onto the Department of  
33 Forestry (ODF) property, making ODF whole.

34  
35 Vice-chair MacDonald asked what ODF's role in approving the proposed reclamation for their parcel.  
36 Buchner replied ODF has been very cooperative throughout this whole process and their mission is to  
37 reduce the amount of additional impact that has to occur, protecting marbled murrelet habitat and  
38 when that it occurs, and make sure their property is safe and stable. They want their property being  
39 stable; habitat. Lewis added that ODF had participated in the Administrative Hearing and did provide  
40 testimony, which was taken into account when the Proposed Order was issued.

41  
42 Vice-Chair MacDonald asked the same question about the City of Garibaldi and if there were any  
43 potential impacts to their watershed for water supply. Buchner said they had not had any contact  
44 with the City of Garibaldi. There were suspected or potential impacts, but MLRR was not able to  
45 actually document any impacts to the water supply specifically.

46  
47 Thomas asked if the impact was more surficial reformation of the slope stability issue, and not a  
48 water quality or contaminant concern. Buchner replied that was correct at this point. Karman added  
49 that during the hearing, MLRR presented photo evidence of impacts to the creek, related to the  
50 water supply, and Buchner testified to the condition of it when she was there inspecting it, but did  
51 not separately track down whether it had impacted the water supply for the city.

52  
53 Dittrich asked about the Final Order creating case law and if Lewis could contextualize it. Lewis  
54 replied that this is the second Civil Penalty for Mining Without a Permit the Program has  
55 implemented and deferred how this impacts MLRR's regulatory practice going forward to DOJ. Lloyd  
56 explained the Final Order, once it is issues, is a Final Order of the Board. There are findings of fact  
57 and conclusions of law in that Order, so in future Administrative Hearings the Agency could site to  
58 that opinion to the extent it was helpful. It would be precedent for the Agency and future hearings  
59 and penalties.

60  
61 Chair Kozlowski asked about the potential negotiations afterwards and what kind of flexibility  
62 DOGAMI will have if this goes through the next steps. Lewis replied that after the Final Order is  
63 issued, the respondent has to do the reclamation, and the Agency has some discretion on whether

the respondent does the work or the Program collects the full fees and does the reclamation on their behalf. Since the Board did approve the original amount of \$432,000 and a lower threshold amount, the Department would be able to reduce the Civil Penalty if the respondent were compliant and interested in taking care of the issue quickly. Lloyd added that depending on what was negotiated between the Department and petitioner, there may be a request to amend the ultimate conclusions of the Final Order, but the analysis the Judge did in finding there was Mining Without a Permit or finding the Department had authority to revoke the permit would remain in the Final Order and would not be amended.

Chair Kozlowski asked if this is the first time the Agency has gotten this far and if Lewis would talk to why this is important and why she is recommended the Board move forward. Lewis explained this is the next step in the process and if it stopped there would not be a Final Order and the Program would not be able to enforce the Proposed Order from the Judge. The Board has the authority to make it a Final Order, which allows MLRR to act and move forward. Lewis said the importance of the case encourages compliance of others when they see the Program has been successful with this particular case, as well as developing the toolbox MLRR needs to be able to do this more efficiently. Lloyd added that Civil Penalties acts as a deterrent in terms of regulated entities complying with the law and shows the Agency is willing to go through the process in these egregious cases. She explained this step is a level of formality, as the Board approved the Civil Penalties initially, but it is not clear in rules or statutes that it becomes final until the Board takes action.

Teeman asked if the Program has identified any opportunities to work collaboratively with other agencies to identify and able to hold operators accountable in this way, and if the Board might consider this an opportunity to consider some type of rulemaking to make this process more streamlined. Chair Kozlowski asked Director Day-Stirrat if it could be considered. He replied they would need to evaluate the request and bring it back. Lewis answered Teeman's question by stating the Program does work closely with the other agencies involved, and that the Agency is very careful to only assess Civil Penalties for the portion of the violations it has authority for, there may additional penalties the permittee is assessed by other agencies.

Thomas asked about collecting fees for reclamation separately from the Civil Penalties. Lewis answered the Program could potentially collect the fees for reclamation separately from the Civil Penalties if the respondent does not want to manage it themselves or if the Agency is not comfortable with them managing it themselves. The Civil Penalty assessment is based only on the violations, and the cost of reclamation is separate, that is assessed as part of every permit. Each permit is required to hold a reclamation security or bond. In this case, the Program does not hold a reclamation security adequate to cover the reclamation, which is one of the violations in the Civil Penalty.

Chair Kozlowski commented on the excellent work on this by Lewis and staff. She remembers how strongly the Board felt about this penalty and that it is critical to carry this through.

Board Action: **MacDonald moved to approve the Department's issuance of the Final Order in the form attached as Exhibit 1, which adopts and incorporates Administrative Law Judge Rackstraw's Proposed Order as the Final Order In the Matter of George Jay Williamson. Teeman seconded. Yes**  
**Votes: Kozlowski; MacDonald; Teeman; Thomas; Dittrich. Motion carried.**

#### **4) Clarification of Board KPMs:**

Chair Kozlowski explained the Board has struggled with evaluating itself when going through the Board KPM, and not being clear on what they are evaluating. She asked Gabel to come today and walk the Board through its KPM questions to come to some consensus around what the terms mean.

Laura Gabel, KPM Coordinator and Coastal Field Geologist, provided a high level overview of the Agency's Key Performance Measures (KPMs). The Agency currently has 6 KPMs, three represent GS&S performance measures: mapping hazards; geologic mapping; Lidar collection. KPM 4 is MLRR's and assesses mine site inspections. KPM 5 is for Customer Service, in which a survey with basically the same questions is sent out separately to GS&S stakeholders and MLRR stakeholders. The last one is KPM 6, which is the governance one that assesses both the Director's performance, and the Board's relationship to the Agency and the Board's performance. The KPMs are reviewed annually and the period covers the fiscal year, which starts July 1 and ends June 30. These need to be submitted to the Department of Administrative Services (DAS) by October 1, so they will be reviewed and approved by the Board at the fall meeting in September.

Gabel said KPM 6 is specifically for the Board and there are 15 questions that are yes or no answers. The request is to go through each question to ensure everyone on the Board is seeing them the same way and in the same vein. The questions will not change, but notes will be taken to create a guidance document on questions that potentially have a way of being looked at in more than one way. She reviewed each question with the Board.

Question 1 – Executive Director's performance expectations are current: Vice-Chair MacDonald asked when the Board would change the Director's expectations. Chair Kozlowski said probably in the fall meeting because he is being evaluated for the past year during the June meeting.

Question 3 – The agency's mission and high-level goals are current and applicable: This is focused on the Strategic Plan. Chair Kozlowski asked when the review will happen. Day-Stirrat explained it would happen on an annual cycle to ensure that during the budget development process it allows for alignment between the Strategic Plan focus and then ultimately the budget.

Question 5 – The board is appropriately involved in review of agency's key communications: Day-Stirrat explained the different types of communications the Agency does, which does not typically come to the Board, but can confirm that should there be an issue of significance, the Board will be informed about the communication. Vice-Chair MacDonald asked if a formal designation should be determined for key communications. Teeman asked what does appropriately involved mean and if it would be appropriate to delegate the Chair to be the liaison to work with staff on key external communications that is not a publication. A lengthy discussion took place. Lopez explained some recent media requests. Day-Stirrat suggested what is being reactive as opposed to the Agency being proactive. It was agreed that staff would continue working on this and come back with a proposal of what are key communications.

Question 7 – The agency's policy option packages (POPs) are aligned with their mission and goals: Day-Stirrat explained this as part of the budget development process. Chair Kozlowski wants the process outlined so there is a description of how and when the POPs are presented to the Board and when they are submitted.

Question 10 – The board is appropriately accounting for resources: Chair Kozlowski asked Day-Stirrat what does that mean and what he would describe it. Day-Stirrat said there is a large spreadsheet in

the Board Packet with lots of line items, which is all the revenues and expenses in the Agency. The question is are the resources the Agency can spend externally being reviewed. Thomas said it is literally a measure of the actual accounting. Dahlberg added from a financial aspect, he considers resources as essentially the Agency's budget, which is made up of people and expenditures. Does the Agency have adequate staffing to do the job and enough to maintain operating expenses. Dahlberg will come up with a summary to be part of the guidance document. Day-Stirrat added that the Agency is meeting monthly with the Chief Financial Office (CFO) and Legislative Fiscal Office (LFO) for checks and balances. Vice-Chair MacDonald said to her Question 9 is saying does the Board physically look at the page, and Question 10 is does the Board think about what they are seeing. Chair Kozlowski said what the Board wants to be clear about, is the words in the future and there being some consistency with how the Members look it.

Question 11 – The agency adheres to accounting rules and other relevant financial controls: Day-Stirrat said because the Agency receives Federal funds, there is a potential audit process from the Federal Government. FEMA has done two desk audits in the last 5 years, the first passed with no findings at all, and in May 2024 they had one audit finding for about \$1,000 bill that was paid in January that should have been paid in December. Chair Kozlowski said the Board would like to know when there is an external audit.

Question 13 – The board coordinates with others where responsibilities and interest overlap: Chair Kozlowski asked who is others, the Board coordinates with whom. Vice-Chair MacDonald provided an example of a meeting in December for the Natural Resources Cabinet Department heads and boards. She would consider others as stakeholders, other State agencies, elected representatives. The Board decided to leave it open ended instead of trying to narrow down the list.

Question 14 – The board members identify and attend appropriate training sessions: Day-Stirrat said this is for the various necessary Workday trainings. Teeman asked for additional assistance for these notifications. It was decided the Recording Secretary will send Teeman a text message when training is available to take.

Gabel and Calarruda will come up with documentation to provide to the Board at the fall meeting. Board will review and approve the document at the next meeting.

#### **5) Director and Staff Presentation:**

Ruarri Day-Stirrat, Director & State Geologist, and Sarah Lewis, MLRR Program Manager provided an updated on the Strategic Plan and where the Agency is in its progress.

Day-Stirrat said agencies are being asked to update their Strategic Plans on a yearly basis. He advocated to hold the Strategic Plan as is, then provide a status update on what the Agency has accomplished over the past year. At that time come back to discuss whether any updates are necessary.

Lewis said the Agency responded to the Governor's Office request for an update on where the Agency is on its Strategic Plan, which was approved by the Board and adopted. The Agency has been diligently working toward implementing it. The Leadership Team identified five agency imperatives that actions have been organized under, and developed a list of strategic actions that fall under each of the categories. These are not included in the plan itself, but are behind the plan helping to inform

207 their actions. The Leadership Team is excited about this as a framework. Lewis reviewed the  
208 progress report information on each of the imperatives and provided examples of the work being  
209 completed.

210  
211 Teeman mentioned that related to the Tribes and innovation on one of the slides, there are  
212 opportunities to partner on things like internships with agencies, and that it is being done with  
213 Federal agencies and some States.

214  
215 A question was asked about what trusted resource refers to. Lewis answered is the Agency is to  
216 serve as a trusted data-driven resources to State, Tribal, Federal, and local leaders on matters related  
217 to geohazards, water, mineral resources, and future earth science related opportunities. Basically,  
218 DOGAMI is the go to folks. Vice-Chair MacDonald said the trusted resource thing is undervalued and  
219 very important. She thinks DOGAMI is in that position to be that trusted resource for a lot of State  
220 data, and that trust often needs to be demonstrated by how the public sees the data, as much as  
221 how it is shared with others in the professional community.

222  
223 Chair Kozlowski asked for an example of where the Agency has had the best success related to  
224 improve service. Lopez answered the transfer from the old website to the new website system,  
225 which has State approved website templates that allows the Agency to piggyback on the work done  
226 throughout the State enterprise to increase accessibility related to the American Disabilities Act  
227 initiative from the Federal Government. Vice-Chair MacDonald also mentioned Lopez's posts on  
228 social media about the new reports being published.

229  
230 Lopez mentioned that more is being done with the Outreach Program than what had been done in  
231 the past and provided a few examples. Chair Kozlowski asked if the Agency coordinates public  
232 outreach with OEM. Lopez answered yes, the Agency has coordinated a decent bit with them. The  
233 revamp of the outreach material resulted in the new Agency postcards that have been well received,  
234 and part of the Expand Outreach imperative. For MLRR, one of the initiatives is ePermitting, which  
235 Lewis believes will be completed within the next 2 years.

236  
237 Day-Stirrat wrapped up by saying the Agency has made a lot of progress in a year, and there are  
238 some things that still need to be worked on. He advocates to hold the Strategic Plan and keep going,  
239 then come back in a year and make a reassessment.

240  
241 Christina Appleby provided a brief update on the legislative action on water and the potential change  
242 in the State Water Data Portal. Appleby said HB 3106 is a bill that creates and funds the Integrated  
243 Water Data Team, that is made up of different natural resource agencies. The current iteration has  
244 the team potentially led by DOGAMI. The Agency would be tasked with creating and maintaining an  
245 online water data portal. The portal would display existing water data produced by State agencies,  
246 and other publicly available data. It would be designed to increase the data availability, accessibility,  
247 and usability in support of water and watershed planning and management at the basin or watershed  
248 scale. If passed and signed, it would require DOGAMI to hire new staff to actually complete the  
249 substantial body of work. Appleby explained the legislative process details that took place to get to  
250 this point. It has been referred to Ways and Means and the Agency does not know if this particular  
251 bill is going to move forward or not. Day-Stirrat added this came as a surprise to the Agency and is  
252 not part of the Governor's Recommended Budget. DOGAMI does not have a water related  
253 regulatory function and is a data driven agency, it would be a more neutral agency to handle it. It  
254 would effectively be a new program and needs to be funded appropriately.

255  
256 Thomas asked what the potential scope of it is, how inclusive of an effort, and how many head count.  
257 Day-Stirrat said the scope is large, but the most important part is the fidelity of the data, so it would  
258 only be clean QC data of the correct fidelity. It is a multi-year effort and the data should be digitally  
259 available and interpretable. A full Fiscal Impact Statement has not been produced yet, but there has  
260 been a robust conversation about what a fiscal impact would be submitted for the amount of FTE  
261 needed.

262  
263 Chair Kozlowski asked who would be the receiver of the information. Day-Stirrat answered literally  
264 anyone who is interested in water, but specifically the intent of the Bipartisan Water Caucus is this is  
265 for Oregonians to be able to go and find information. Teeman asked if this is related to the 100 year  
266 water vision that was rolled out a few years ago. Day-Stirrat stated everything is related in some way  
267 and discussed other states efforts to capture water data.

268  
269 Ruarri Day-Stirrat, Director & State Geologist, presented on the Geologic Carbon Sequestration in  
270 Oregon, that is a synthesis of three different presentations he has given in the past few months to  
271 the State Land Board, House Committee on Climate, Energy and Water, the Senate, and the Senate  
272 Committee on Energy and Environment. It relates to a Policy Option Package in DOGAMI's Budget,  
273 and is also linked with a Policy Option Package in the Department of State Lands Budget.

274  
275 Dittrich asked if it is known what the pore space capacity is. Day-Stirrat answered there is plenty of  
276 pore space capacity, the limiting factor is money. Dittrich asked if the places are scalable or is there  
277 no economies of scale yet. Day-Stirrat replied the first one is expensive, the tenth is premium. The  
278 more it is done, the more infrastructure that goes in around it, the costs come down. Dittrich asked  
279 about the point source for direct air capture. Day-Stirrat replied the point source is there and would  
280 come first, and then direct air capture. There is other technology and potentially three sources.

281  
282 Thomas asked with the other departments involved, considering the talk about injecting below the  
283 drinking water aquifers, what is DEQs position on potential cross contamination of or influence on  
284 the aquifer systems. Day-Stirrat said protection of groundwater is sacrosanct in the regulations, that  
285 is the line in the sand. DEQ already primacy for two other classes of injection wells, Class 2 and Class  
286 5 wells. Class VI would just be an addition to their portfolio of regulatory reporting. Their role is to  
287 protect groundwater, DOGAMI's role would be around drilling and broader geology, and both  
288 agencies with regulatory programs would work together to make sure there is no impact to  
289 groundwater. UIC Class VI regulations are incredibly strict around the monitoring that has to occur  
290 around the proof around injection pressure.

291  
292 Thomas asked if the point source options are power plant, and in terms of the complicating  
293 chemistry of those point source emissions, as it would pertain to the chemistry of what would  
294 happen in the subsurface, be part of DOGAMI's assessment. Day-Stirrat answered no, that is  
295 definitely in US DOE space, where they are working on understanding capture technology to make  
296 sure they have a pure form of CO<sub>2</sub> for injection. That is individuals tuned into individual facilities  
297 around how that scrubbing occurs.

298  
299 Vice-Chair MacDonald is interested in the kinetics of mineralization and how that varies by the  
300 mineral source of the iron and anything else that would form a carbonate. She asked if this is  
301 something one must think about only for iron oxides, or are you going to get into other mafic  
302 minerals, and if so, how does one do that kinetically. Day-Stirrat said this goes back to the UIC Class



VI regulations, where you have to prove that subsurface is disconnected from the shallow system, via whatever mechanism possible. The second part is the water chemistry, and the Class VI regulations describe something that is non-potable. It is definitively a brine that does not have a human or agricultural use. So it must be proven via seismic and other mechanisms that there is no connection from that injection well to aquifers for drinking. A lengthy discussion took place.

Thomas asked from the accessibility perspective, considering the wells are about 3000 feet deep potentially, is there infrastructure available in Eastern Oregon to readily install UIC wells that depth. Day-Stirrat answered not right now, but it is standard technology in the oil field, the only thing different is going through basalt. This is where the experience that CarbFix has drilling in younger basalt in Iceland comes from. Thomas said it is akin to oil field drilling effectively. Day-Stirrat said yes, definitely not water well drilling.

Dittrich asked if there is interest from industry, given the changes in financial incentives. Day-Stirrat said he believes there is. One of the questions he asked himself last year is will this industry go away and he does not think it will, it is just going to change.

Kozlowski thanked Day-Stirrat for the presentation.

A quick discussion took place about having the September meeting be in person.

**5) Board Adjourn:**

Chair Kozlowski adjourned the meeting at 2:52 p.m.

APPROVED

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Linda Kozlowski, Chair

# Staff Report and Memorandum

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To: Chair, Vice-Chair, and members of the DOGAMI Governing Board

From: Steve Dahlberg, Chief Financial Officer

Date: June 17, 2025

**Regarding: Agenda Item 7– Financial Report**

Attached is the DOGAMI Budget Status Report as of April 30, 2025, for the Geological Survey and Services (GS&S) Program and the Mineral Land Regulation & Reclamation (MLRR) Program.

***Proposed Board Action: The Budget Status Report be Approved/Not Approved as presented.***



**TO:** DOGAMI Governing Board

**FROM:** Steve Dahlberg, Chief Financial Officer

**DATE:** June 16, 2025

**SUBJECT:** Financial Operations and Reporting

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## Board Governance

The Board has a duty to provide guidance related to operational decision-making and to affirm the Agency is appropriately managing its financial resources. Four key areas of responsibility include:

- The Board reviews all proposed budgets.
- The Board periodically reviews key financial information and audit findings.
- The Board is appropriately accounting for resources.
- The Agency adheres to accounting rules and other relevant financial controls.

In addition to operational communication, this memo will include topical areas of discussion related to these objectives with the expectation of inquiry and follow-up as needed to support Board governance.

**Fiscal Year 2024** (July 2023 – June 2024)

**Fiscal Year 2025** (July 2024 – June 2025)

The information in this Board report is as of **April 30, 2025**, which is 20 of 24 months of the 2023-25 biennium. The revenue collections, payroll monitoring, accounts payable, indirect cost capture, and financial system structure set up are routine and normal processing. DOGAMI's actual expenditures are from July 2023 through January 2025, with projected expenditure amounts for the remainder of the biennium, May and June 2025. The overall expenditures are following our expectations and planning.

## Geological Survey & Services (GS&S) Program

As of April 30, 2025

	2023-25 Projected Revenue & Expenditures			
	General Fund	Other Funds*	Federal Funds	All Funds
Total Available Revenue**	\$ 7,784,185	\$ 2,933,165	\$ 3,654,058	\$ 14,371,409
Total Expenditures	\$ (7,634,126)	\$ (2,146,601)	\$ (3,646,125)	\$ (13,426,851)
GS&S Ending Balance	\$ 150,059	\$ 786,565	\$ 7,933	\$ 944,557
Percent under Revenues	1.9%	26.8%	0.2%	6.6%
Percent under Expenditure budget	1.9%	17.0%	35.6%	16.3%

\* includes the Strong Motion Instrument Fund (SMIF)

\*\* Includes the beginning balance

**The General Fund (GF):** Budget is \$7,784,185, which has been updated for the biennium's Salary Pot adjustment for staff increase in pay steps and COLA's. The projected total expenditures to end the 2023-25 biennium is expected to be \$7,634,126 which is under budget by \$150,059 or 1.9%. The total GF expenditure includes staffing costs, operating expenses, scientific equipment, DAS and other state charges, professional services, as well as grant match (in staffing costs) associated with USGS STATEMAP and USGS Data Preservation grants.

**The GS&S Other Funds (OF):** The projected revenues are \$2,237,334 of both Lidar and staff-based grants. The revenues from Lidar projects accounts for \$1,489,375 (66.6%), while the grants that are focused on staff work is \$747,959 (33.4%).

The total expenditures are projected at \$2,146,601 which is 17.0% under the expense limitation. These costs include our staffing costs, travel & supplies, agency indirect, and Lidar vendor costs which total \$1,297,000.

**The Federal Funds (FF):** The total projected revenues are \$3,761,486 for both Lidar and staff-based federal grants. The grant revenues (staff resource driven) represent \$2,623,747 (69.8% of total federal revenues) driven by USGS (38%), FEMA (30%), NOAA (30%), and BLM (2%).

The Lidar revenues are \$1,137,739 (30.2% of total federal revenues) driven by BLM (53%), FEMA (46%), and USGS (1%).

The current expenditures for the biennium are now projected at \$3,646,125. This amount represents expenditures being 35.6% under the budgeted expense limitation. These expenditures consist of DOGAMI staffing, travel & supplies, agency indirect, and Lidar vendor costs which total \$820,857.

## Strong Motion Instrument Fund (SMIF)

As of April 30, 2025

### 2023-25 Actual Revenue & Expenditures

	Other Funds
Beginning 2023-25 Balance	\$ 220,236
Actual + Projected Revenues	\$ 53,400
Actual + Projected Expenditures	\$ -
SMIF Projected Ending Balance	\$ 273,636

**The Strong Motion Instrument Fund:** Starts the new 2023-25 biennium with a balance of \$220,236. The revenues are projected to include two (2) completed deposits and one (1) projected deposit (project) for a total of \$53,400. These revenues are from developers of large building projects in-lieu of installing seismic instruments in the new buildings. DOGAMI is reviewing the SMIF program to decide if there are additional uses of these funds to increase the capacity and data availability of the seismic network.

## Mineral Land Regulation & Reclamation (MLRR) Program

As of April 30, 2025

### 2023-25 Projected Revenue & Expenditures

	Other Funds
MLRR Beginning Balance	\$ 1,190,221
Total Revenues	\$ 5,787,179
Total Expenditures	\$ (5,774,918)
MLRR Ending Balance	\$ 1,202,482

Percent under Expenditure budget	2.2%
Raw % of target 6-month operating reserve	92.5%
Net % of target 6-month operating reserve	110.4%

**The MLRR Program** – The 2023-25 biennium is projected to have revenues of \$5,787,179 consisting of permits (90.9%), DEQ Transfers (7.0%) and other sources (2.1%). The total expenditure is projected to be \$5,774,918, which is under the updated budget expenditure limitation by \$130,508 (2.2%). Reminder: In the December E-Board, DOGAMI's request of a \$750,000 expenditure increase was approved and is included in this reporting period. As of this board meeting, MLRR is anticipating an ending balance of \$1,202,482 representing 92.5% of a six-month operating reserve target of \$1,300,000. The 92.5% includes higher than expected consolidated permit consulting costs, one-time process audit costs, and much higher civil penalty legal costs.

## Reclamation Guarantee Fund

As of April 30, 2025

Beginning 2023-25: 59 Cash Securities	\$ 898,288
11 New Securities	\$ 297,469
-5 Security Releases	\$ (60,968)
Biennium to Date: 65 Cash Securities	\$ 1,134,789

**The Reclamation Guarantee Fund** retains \$1,134,789 in cash securities. Since the beginning of the 2023-25 biennium, there is a total of 11 added securities in this biennium with 5 this quarter. There is a total of 5 released securities this biennium with 2 released this quarter.

## Mineral Land Regulation & Reclamation (MLRR) Program General Fund - ePermitting

As of April 30, 2025

2023-25 Projected Revenue & Expenditures	
	Other Funds
Total Available Revenue	\$ 2,060,023
Total Expenditures	\$ (115,714)
MLRR Ending Balance	\$ 1,944,309

Percent under Expenditure budget 94.4%

**The MLRR ePermitting Fund** began this biennium with the Legislative approval of \$2,000,000 + Salary Pot adjustment for a total of \$2,060,023 for this biennium. This is a separate fund from MLRR operations. The projected expenditures are for vendor costs (development and hosting), DEQ will provide a project manager and DOGAMI will hire a dedicated ISS4 position, including existing staff who will work directly on the project. The project is delayed due to the delay in DEQ completing their on-line system. DOGAMI is leveraging lessons learned during DEQ's implementation. This change will push out our starting timeframe, but not the overall duration of the ePermitting implementation. DOGAMI completed the Special Procurement process with DAS and is nearly done with the proposed contract to forward to the vendor for review of DOGAMI's ePermitting project. To carry over the unspent amount in 2023-25, a Policy Option Package (POP) has been submitted to carry over the remaining balance into the 2025-27 biennium. It's anticipated that by mid-April, DOGAMI will be initiating work on this project.

## Business Office Activities

All required financial reporting is complete and up to date. We hold monthly project manager meetings, using tracking tools and project financials to review the financial status and project updates.

The Business Office continues to be on-time with processing accounts payable items, creating invoices, making federal draws, various grant reporting, and continue our analysis of the grants and lidar projects.

We have helped with purchasing new scientific equipment for the Portland Office.

## Financial Terms:

**Allotment** – the agency's plan of estimated expenditures, revenues, cash receipts and disbursements. Quarterly, agencies submit their request for the allotment to DAS and upon approval, funds are made available to the agency.

**Appropriation** – An amount of money from the General Fund approved by the Legislature for a certain purpose.

**ARB** – Agency Requested Budget. Using the CSL, adding Policy Option Packages (POP's).

**Budget** – The target of the revenues and expenses for the agency.

**CSL** – Current Service Level. Starting point of the budget process based upon the previous biennium budget with various adjustments for inflation and other DAS adjustment percentages, program phase-outs, previous biennium one-time costs.

**Expenditure Authority** – One who has the permission to authorize or approves the spending for the agency.

**Expenditure Limitation** – For Other and Federal Funds – the spending limits set by the legislature identifying the maximum amount the agency may spend, defined in the agency's budget. These funds must have a revenue source in place. If the agency receives more funds (revenues), the agency may go to a legislative session for an increase and approval to spend the additional revenues.

**Expenses / Expenditures** – The decrease in net current financial resources. These include disbursements through Payroll for salary and benefits and Accounts Payable for service & supplies as well as accruals for the current period.

**Federal Funds** – Money provided for a specific set of work from a Federal Agency. DOGAMI typically works with BLM, FEMA, NOAA, and USGS. These are the typical federal agencies DOGAMI have submitted proposals and received a grant.

**Grant Awards** – The total amount of the grant from a funder. The award document contains a number of specific grant details items including start and end dates, brief description, contact, etc. A lot of work is done before a grant is awarded. This frequently includes working directly with a funder and building a proposal for consideration. Some grants are competitive, which the agency is competing with other for an entire grant or a portion of the available money the funder has available to distribute.

**Grant Balance** – The remaining amount of a grant after work is charged to the grant. Work charged to the grant will be followed with a draw or invoice to be reimburse the agency for the work completed. The agency continues to work until the end of the project and/or there's no remaining grant balance.

**GRB** – Governor Recommended Budget. Using the ARB plus modifications the Governor's Office recommends.

**LAB** – Legislative Approved Budget. Final decisions and changes. Base Budget is approved, may be followed with other bills that changes (add/subtracts) from the agency's original bill.

**ORBITS** – Oregon's Budget Information Tracking System. The system used to store all budget information and prepare budget requests and reports.

**ORPICS** – Oregon's Position Information Control System. The system to establish and maintain budgeted positions and related expenditures at a detail level. The personal information is summarized and added to ORBITS

**Other Funds** – Money received by state agencies that does NOT come from the General Fund or from the federal government. These are typically from other state agencies, cities or counties, or private companies where they are paying DOGAMI for services. Any money that's not provided by the Oregon state general fund directly to DOGAMI and not by a federal agency is considered an Other Fund.

**Revenues** – The recording of inbound cash from external sources. Revenues are collected through Invoicing, Draws, and Transfers. This term 'revenues' is normally used with Other/Federal Funds.

**Reversion** – The amount of the General Fund that is not spent at the end of the biennium. Reminder – the GF starts with a zero balance and ends with a zero balance.

**SABRS** – The State Audit and Budget Reporting Section. Supports the DAS Chief Financial Office with budget preparation and execution.



**Salary/OPE** – Costs of personal and related benefit costs. OPE are Other Personal Expenses, commonly referred as fringe benefits or just benefits.

**Service & Supplies** – Non-Payroll costs. These include travel, training, professional services, State charges for services, legal, office, and capital asset expenses (over \$5,000 and a useful life greater than 1 year).

**ATTACHMENTS:**

DOGAMI Financial Report

Department of Geology & Mineral Industries  
Budget Status Report: As of April 2025

% of Time Spent of 2 years  
92%

Geological Survey & Services (GS&S) Program

Budget Category / Line Item	2023-25 Budget by Funding Source				2023-25 Actual Revenue & Expenditures				Actual Budget Spent				2023-25 Projected Revenue & Expenditures				2023-25 Actual + Projected Revenue & Expenditures				Actual + Projected Budget Total			
	General	Other	Federal	All	General	Other	Federal	All	All				General	Other	Federal	All	General	Other	Federal	All	All			
	Funds	Funds	Funds	Funds	Funds	Funds	Funds	Funds	GF	OF	FF	Funds	Funds	Funds	Funds	Funds	Funds	Funds *	Funds	Funds	GF	OF	FF	Funds
Revenue																								
Beginning Balance	-	702,426	-	702,426	-	695,831	(107,428)	588,403					-	-	-	-	-	695,831	(107,428)	588,403				
2023-25 Revenue & Transfer	7,784,185	2,016,801	5,522,133	15,323,119	6,611,764	2,131,473	3,312,858	12,056,095					1,022,361	105,861	448,628	1,576,850	7,634,126	2,237,334	3,761,486	13,632,946				
Total Available Revenue	7,784,185	2,719,227	5,522,133	16,025,545	6,611,764	2,827,304	3,205,430	12,644,499	85%	104%	58%	79%	1,022,361	105,861	448,628	1,576,850	7,634,126	2,933,165	3,654,058	14,221,349	98%	108%	66%	89%
Expenditures:																								
Personnel Services	4,893,958	545,199	1,865,447	7,304,604	4,067,566	586,278	-	4,653,844	83%	108%	0%	64%	424,181	37,434	2,307,334	2,768,949	4,491,747	623,712	2,307,334	7,422,793	92%	114%	124%	102%
Services & Supplies																								
Instate Travel	74,013	46,167	64,332	184,512	111,196	10,052	27,472	148,721					15,992	537	804	17,333	127,188	10,589	28,276	166,054	172%	23%	44%	90%
Out of State Travel	18,964	-	-	18,964	29,652	996	10,284	40,931					9,937	-	369	10,306	39,589	996	10,653	51,237	209%			270%
Employee Training	40,814	9,747	7,804	58,365	118,751	220	11,405	130,375					3,554	-	608	4,162	122,305	220	12,013	134,537	300%	2%	154%	231%
Office Expenses	34,102	-	-	34,102	17,312	22	2,561	19,895					2,774	-	-	2,774	20,086	22	2,561	22,669	59%			66%
Telecomm	116,107	-	-	116,107	69,728	-	-	69,728					8,190	-	-	8,190	77,918	-	-	77,918	67%			67%
State Gov't Svc Chg	521,138	-	-	521,138	518,941	-	-	518,941					1,212	-	-	1,212	520,153	-	-	520,153	100%			100%
Data Processing	473,789	-	-	473,789	486,942	-	-	486,942					81,195	-	-	81,195	568,137	-	-	568,137	120%			120%
Publicity & Publications	1,266	5,554	66,952	73,772	2,392	-	1,265	3,658					-	-	-	-	2,392	-	1,265	3,658	189%	0%	2%	5%
Professional Services	180,028	1,048,074	3,396,483	4,624,585	242,819	1,307,024	1,067,047	2,616,890					183,373	-	9,842	193,215	426,192	1,307,024	1,076,889	2,810,105	237%	125%	32%	61%
IT Professional Services	10,213	95,866	-	106,079	4,096	-	-	4,096					-	-	-	-	4,096	-	-	4,096	40%	0%		4%
Attorney General	22,642	-	-	22,642	16,148	-	-	16,148					6,403	-	-	6,403	22,551	-	-	22,551	100%			100%
Employee Recruitment	2,650	-	-	2,650	13,663	-	-	13,663					-	-	-	-	13,663	-	-	13,663	516%			516%
Dues & Subscriptions	6,750	-	-	6,750	5,914	-	-	5,914					4,175	-	-	4,175	10,089	-	-	10,089	149%			149%
Lease Payments & Taxes	524,797	-	10,854	535,651	463,402	-	-	463,402					66,570	-	-	66,570	529,972	-	-	529,972	101%		0%	99%
Fuels & Utilities	-	-	-	-	-	-	-	-					-	-	-	-	-	-	-	-				
Facilities Maintenance	-	-	-	-	3,232	-	-	3,232					500	-	-	500	3,732	-	-	3,732				
Medical Services	-	-	-	-	193	-	-	193					-	-	-	-	193	-	-	193				
Agency Related S & S	-	-	-	-	6,947	16	38,552	45,514					-	-	-	-	6,947	16	38,552	45,514	100%			
Intra agency Charges	-	-	-	-	-	-	-	-					-	-	-	-	-	-	-	-	100%			
Other Services & Supplies	487,665	823,892	240,419	1,551,976	391,885	950	96	392,931					5,055	-	-	5,055	396,941	950	96	397,986	81%	0%	0%	26%
Expendable Prop (\$250-\$500)	23,525	11,210	11,144	45,879	6,832	-	-	6,832					758	-	-	758	7,590	-	-	7,590	32%	0%	0%	17%
IT Expendable Property	249,965	-	-	249,965	350,181	-	-	350,181					74,033	-	-	74,033	424,214	-	-	424,214	170%	100%		170%
Technical Equipment	51,799	-	-	51,799	116,558	-	-	116,558					136,501	-	-	136,501	253,059	-	-	253,059	489%			489%
Automotive & Aircraft	-	-	-	-	-	-	-	-					-	-	-	-	-	-	-	-	100%			
Data Processing Software	-	-	-	-	-	-	-	-					-	-	-	-	-	-	-	-				
Data Processing Hardware	50,000	-	-	50,000	9,122	-	-	9,122					-	-	-	-	9,122	-	-	9,122	100%			18%
Other Capital Outlay	-	-	-	-	-	-	-	-					-	-	-	-	-	-	-	-				
Indirect	-	-	-	-	(441,708)	201,806	165,158	(74,744)					(2,042)	1,266	3,329	2,552	(443,750)	203,072	168,487	(72,191)				
Total Services & Supplies	2,890,227	2,040,510	3,797,988	8,728,725	2,544,199	1,521,087	1,323,839	5,389,124	88%	75%	35%	62%	598,180	1,803	14,952	614,934	3,142,379	1,522,889	1,338,790	6,004,058	109%	75%	35%	69%
Total Expenditures	7,784,185	2,585,709	5,663,435	16,033,329	6,611,764	2,107,365	1,323,839	10,042,968	85%	82%	23%	63%	1,022,361	39,236	2,322,286	3,383,884	7,634,126	2,146,601	3,646,125	13,426,851	98%	83%	64%	84%
GS&S Ending Balance	\$ -	133,518	\$ (141,302)	\$ (7,784)	\$ -	\$ 719,940	\$ 1,881,592	\$ 2,601,531					\$ -	\$ 66,625	\$ (1,873,658)	\$ (1,807,033)	\$ -	\$ 786,565	\$ 7,933	\$ 794,498				

\$ 150,059  
Under-budget

\* Includes the Strong Motion Instrument Fund (SMIF)

Department of Geology & Mineral Industries

Budget Status Report: As of April 2025

% of Time Spent of 2 years
92%

Mineral Land Regulation & Reclamation (MLRR) Program

Budget Category / Line Item	2023-25 Budget by Funding Source	2023-25 Actual Revenue & Expenditures	% Actual Budget Spent to Date	2023-25 Projected Revenue & Expenditures	2023-25 Actual + Projected Revenue & Expenditures	Actual + Projected Budget % Total Spent
	Other Funds	Other Funds	OF	Other Funds	Other Funds	OF
Revenue						
Beginning Balance	1,190,221			1,190,221	1,190,221	
2023-25 Revenue & Transfers	4,285,983	6,395,759		(608,580)	5,787,179	
Total Available Revenue	5,476,204	6,395,759	117%	581,641	6,977,400	127.4%
Expenditures:						
Personnel Services	4,129,107	3,852,912	93%	339,605	4,192,516	101.5%
Services & Supplies						
Instate Travel	87,500	32,003		3,609	35,612	40.7%
Out of State Travel	-	3,476		2,500	5,976	
Employee Training	38,416	17,752		1,240	18,992	49.4%
Office Expenses	37,512	15,788		2,249	18,037	48.1%
Telecomm	52,491	32,244		3,078	35,322	67.3%
State Gov't Svc Chg	-	-		-	-	
Data Processing	88,330	34,958		-	34,958	39.6%
Publicity & Publications	4,999	3,905		250	4,155	83.1%
Professional Services	853,498	890,107		49,941	940,048	110.1%
IT Professional Services	-	-		-	-	
Attorney General	311,852	250,274		25,085	275,359	88.3%
Employee Recruitment	-	3,676		-	3,676	
Dues & Subscriptions	3,674	1,880		-	1,880	51.2%
Lease Payments & Taxes	89,118	69,054		12,168	81,221	91.1%
Fuels & Utilities	14,128	11,976		2,007	13,983	99.0%
Facilities Maintenance	13,042	21,989		1,299	23,288	178.6%
Medical Services	-	-		-	-	
Agency Related S & S	-	684		-	684	
Intra agency Charges	-	-		-	-	
Other Services & Supplies	128,539	540		-	540	0.4%
Expendable Prop (\$250-\$5000)	20,437	10,254		643	10,897	53.3%
IT Expendable Property	32,783	2,845		-	2,845	8.7%
Technical Equipment	-	-		-	-	
Automotive & Aircraft	-	-		-	-	
Data Processing Software	-	-		-	-	
Data Processing Hardware	-	-		-	-	
Other Capital Outlay	-	-		-	-	
Indirect	-	74,744		186	74,930	
Total Services & Supplies	1,776,319	1,478,147	83%	104,255	1,582,402	89.1%
Total Expenditures	5,905,426	5,331,059	90%	443,859	5,774,918	97.8%
MLRR Ending Balance	(429,222)	\$ 1,064,700		\$ 137,782	\$ 1,202,482	

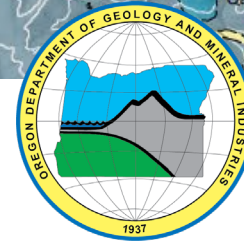
Department of Geology & Mineral Industries

Budget Status Report: As of April 2025

Other programs

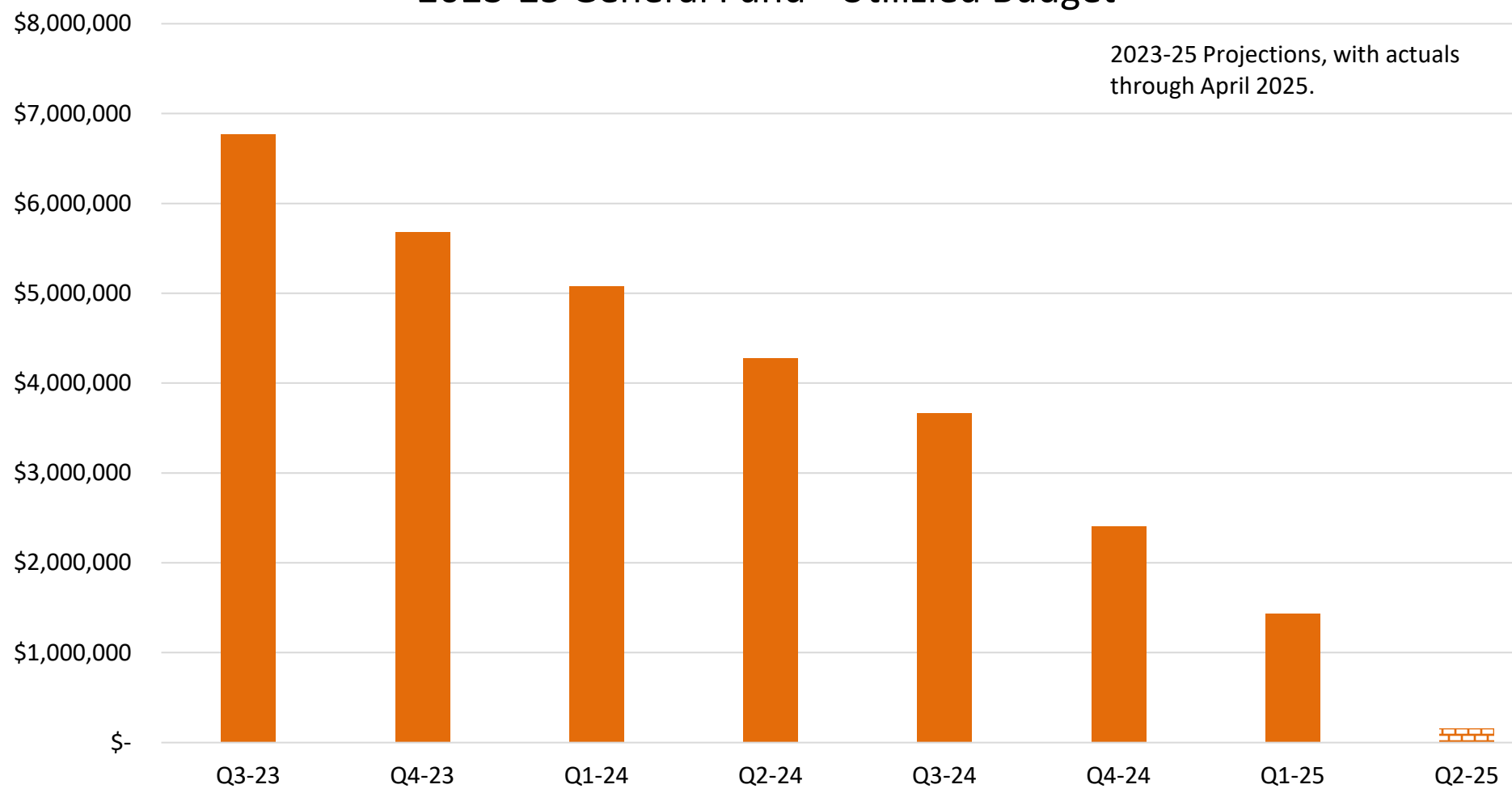
Geological Survey & Services	
Strong Motion Instrument Fund (SMIF)	
Revenue:	Projected Revenue & Expenditures
Beginning Balance	220,236
Actual Revenues (July 2023 - April 2025)	35,600
Projected Revenues	17,800
Total Available Revenue	273,636
Expenditures:	
Actual Personnel Services	-
Services & Supplies:	
Projected Professional Services	-
Total Expenditures	-
SMIF Ending Balance	\$ 273,636

Mineral Land Regulation & Reclamation	
Reclamation Guarantee Fund	
	Beginning 2023-25
58 Cash Security's	\$ 898,288
11 New Securities	\$ 297,469
5 Security releases	\$ (60,968)
63 Cash Security's	\$ 1,134,789

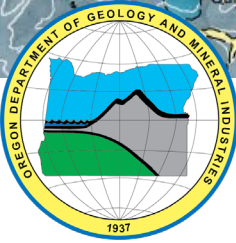


# 2023-25 General Fund - Utilized Budget

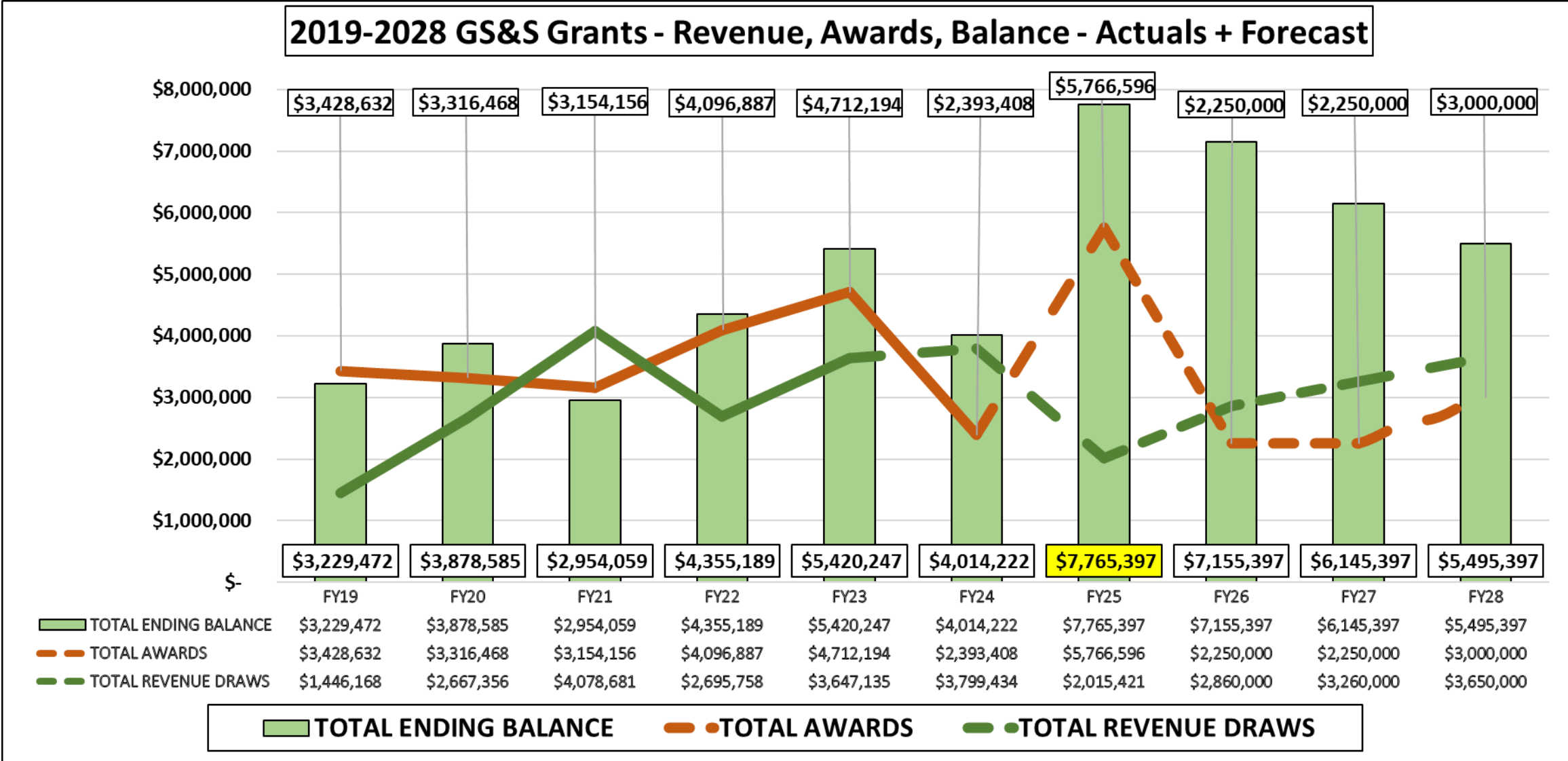
2023-25 Projections, with actuals through April 2025.

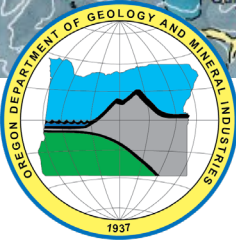


Calendar Qtrs



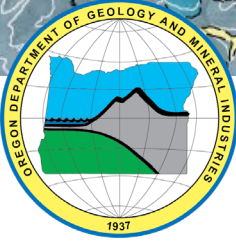
This Projection updated through May 2025





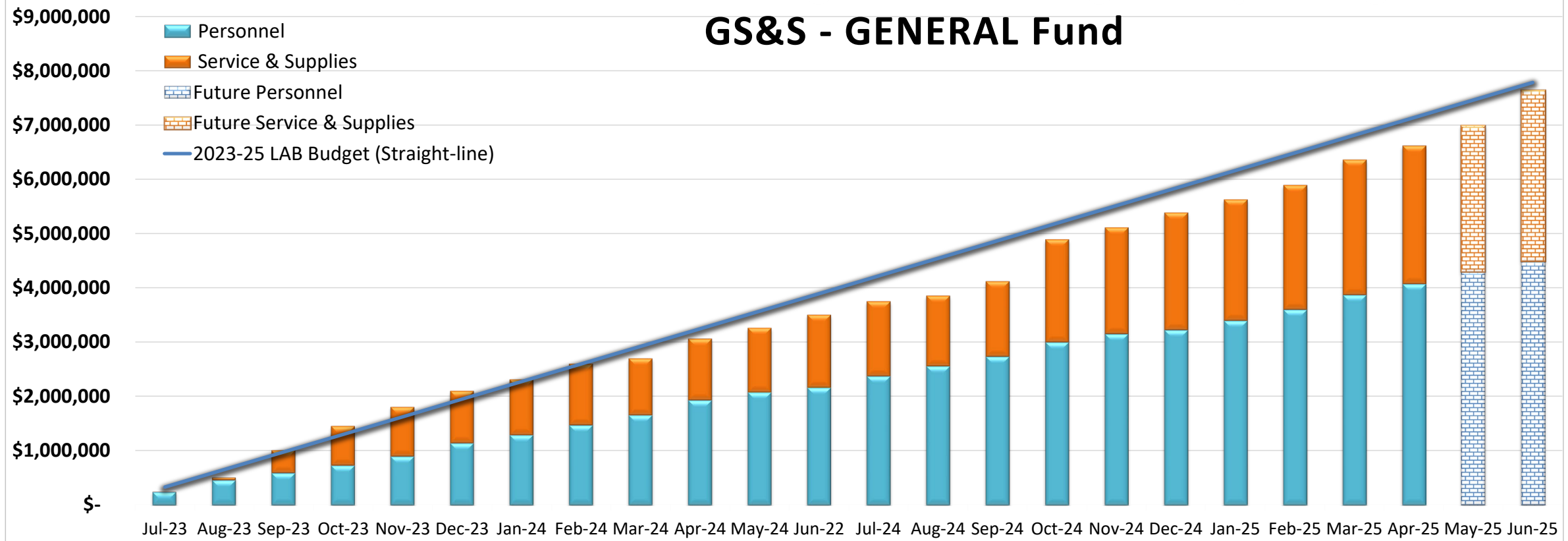
GS&S GENERAL FUND - Appn 89707		Legislative Adopted Budget		Revenue & Expenditures		Projections	Difference Budget to Projection		March Board Meeting	Change
Appropriation: \$7,784,185				Actuals to Date	% Spent		Under/(Over)			
Salpot adjustment \$400,584		April 2025								
Revenue:										
GF Appropriation	\$	7,784,185	\$	7,784,185	N/A					
Expenditures:										
Personal Services	\$	4,893,958	\$	4,067,566	83%	\$ 4,491,747	\$ 402,211	\$ 4,486,960	\$ 4,787	
Services and Supplies	\$	2,788,428	\$	2,418,518	87%	\$ 2,880,197	\$ (91,769)	\$ 2,748,788	\$ 131,409	
Capital Outlay	\$	101,799	\$	125,681	123%	\$ 262,182	\$ (160,383)	\$ 305,182	\$ (43,000)	
Total Expenditures	\$	7,784,185	\$	6,611,764	85%	\$ 7,634,126	\$ 150,059	\$ 7,540,930	\$ 93,196	
						Net Position	\$ 150,059	\$ 243,255	\$ (93,196)	
						(Left in Limitation	Within Budget			
						Expenditures under budget % >>	1.9%			

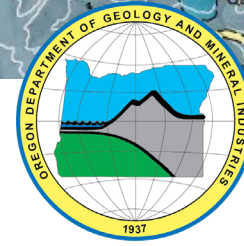




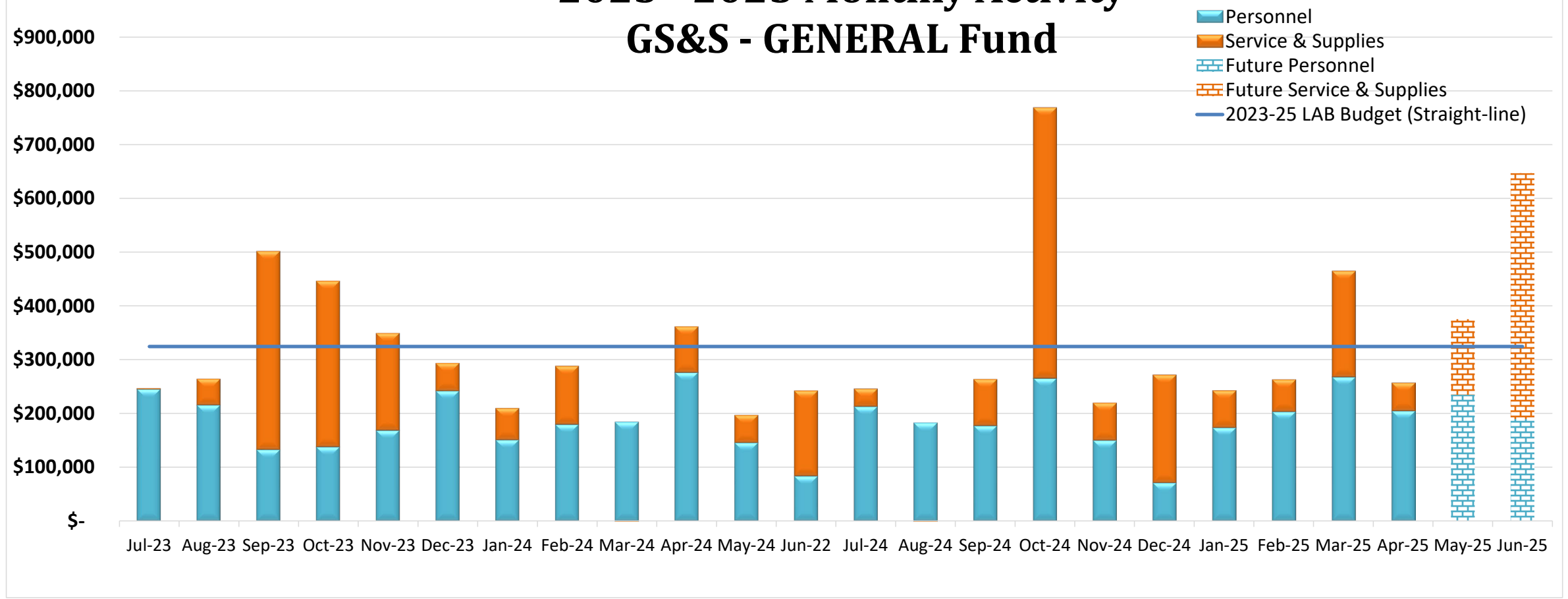
# 2023 - 2025 Running Balance: Budget to Spending

## GS&S - GENERAL Fund

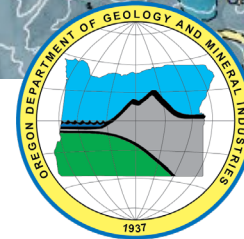




# 2023 - 2025 Monthly Activity GS&S - GENERAL Fund







**GS&S OTHER FUNDS - Appn 30208**

**Appropriation: \$2,585,709**

**SalPot Adjustment \$46,468**

**Beginning Balance:**

**Beginning Balance** \$ 702,426 \$ 695,831 N/A

**Revenue:**

**Revenue:** \$ 2,016,801 \$ 2,131,473 N/A

**Expenditures:**

Personal Services \$ 545,199 \$ 586,278 108%

Services and Supplies \$ 2,040,510 \$ 1,521,087 75%

Capital Outlay \$ - \$ - 0%

**Total Expenditures** \$ 2,585,709 \$ 2,107,365 82%

**Projections**

\$ 695,831

\$ 2,237,334

\$ 623,712

\$ 1,522,889

\$ -

\$ 2,146,601

**Net Position**

(Projected Ending Cash)

**Difference Budget to  
Projection  
Under/(Over)**

\$ 6,595

\$ 220,533

\$ (78,513)

\$ 517,621

\$ -

**\$ 439,108**

**\$ 786,565**

Within Budget

March Board  
Meeting

Change

\$ 2,246,424 \$ (9,090)

\$ 638,300 \$ (14,588)

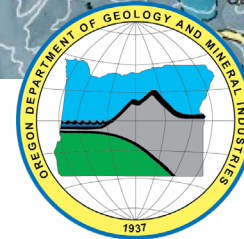
\$ 1,579,000 \$ (56,111)

\$ - \$ -

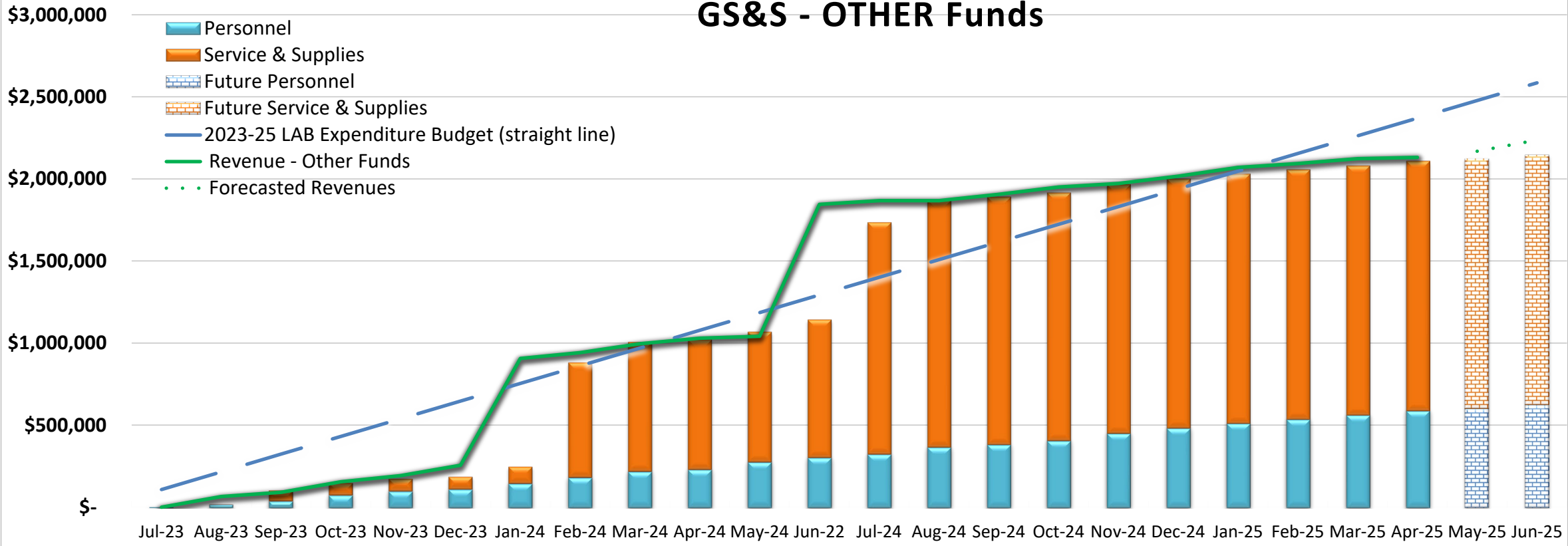
\$ 2,217,300 \$ (70,699)

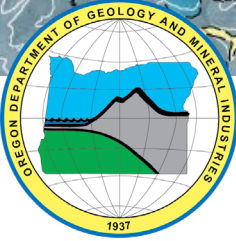
\$ 724,955 \$ 61,610

Expenditures under budget % >> 17.0%

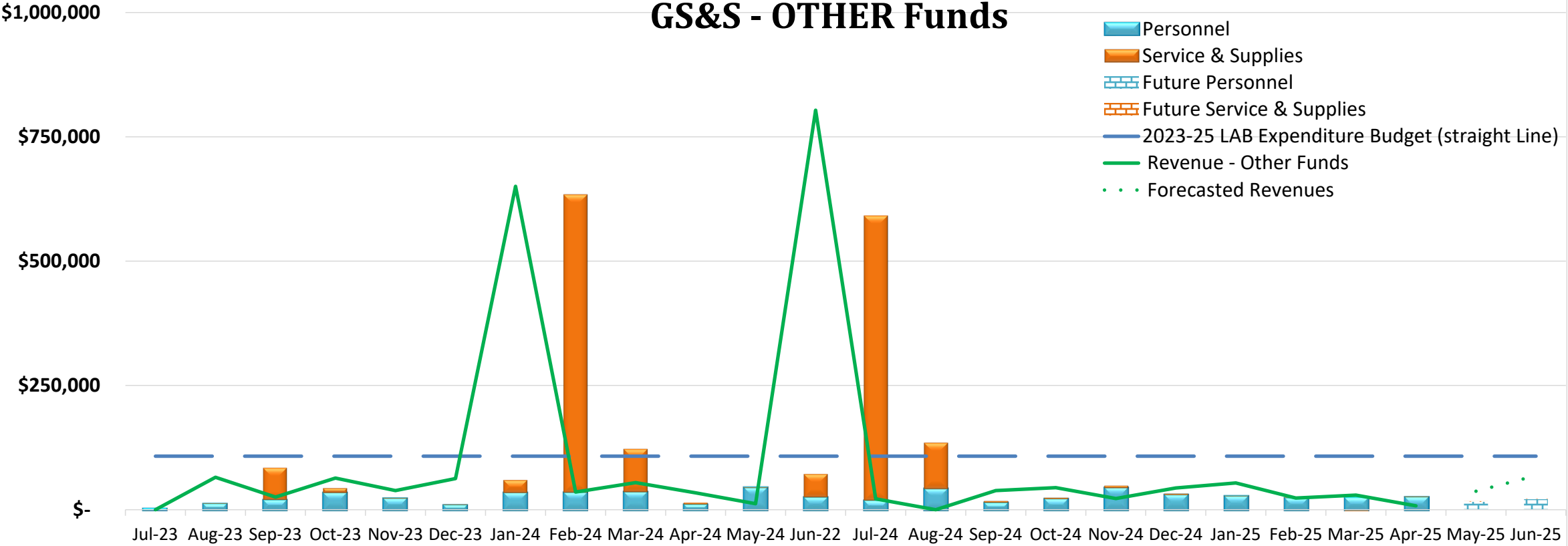


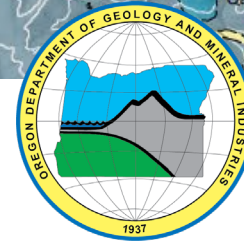
# 2023 - 2025 Running Balance: Budget to Spending GS&S - OTHER Funds



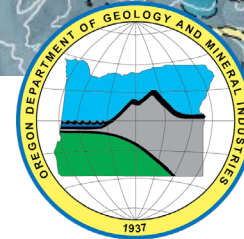


# 2023 - 2025 Monthly Activity GS&S - OTHER Funds

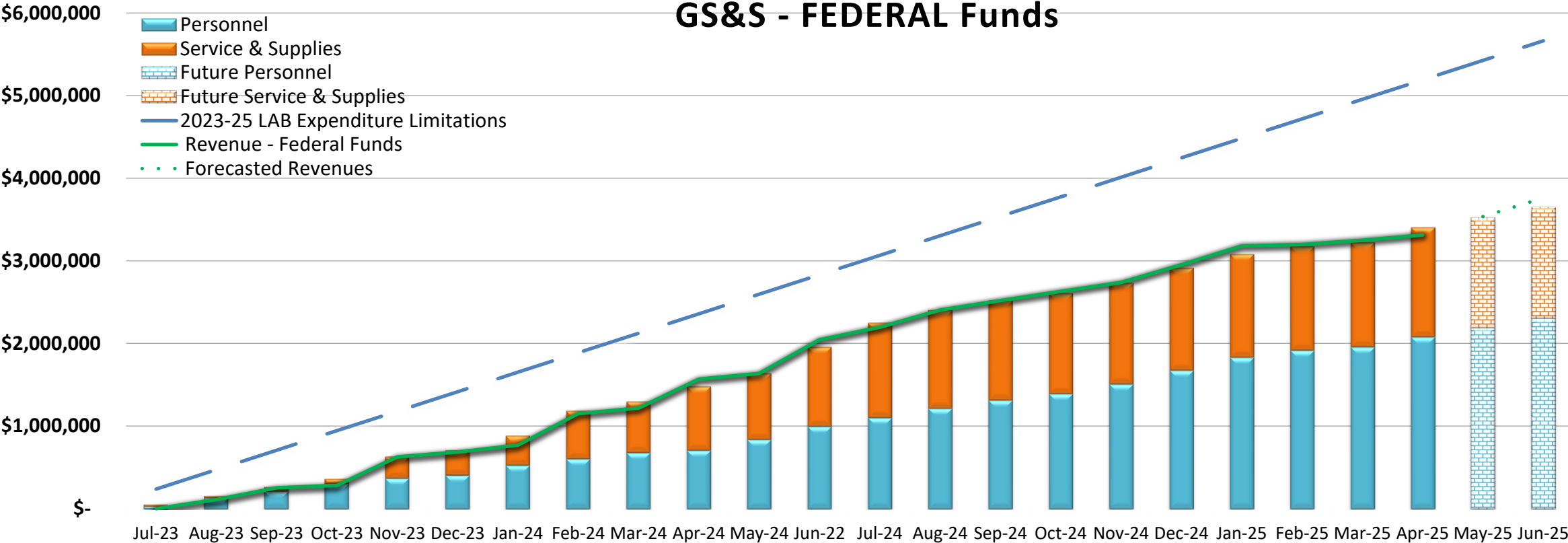




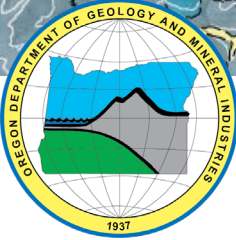
GS&S FEDERAL FUNDS - Appn 60207		Legislative Adopted Budget		Revenue & Expenditures		Projections	Difference Budget to Projection Under/(Over)	March Board Meeting	Change
Appropriation: \$5,663,435		Budget		Actuals to Date	% Spent				
SalPot Adjustment \$141,302				April 2025					
Beginning Balance:									
	Beginning Balance	\$	-	\$	(107,428)	N/A	\$ (107,428)	\$ 107,428	
Revenue:									
	Revenue:	\$	5,522,133	\$	3,312,858	N/A	\$ 3,761,486	\$ (1,760,647)	\$ 3,725,955 \$ 35,531
Expenditures:									
	Personal Services	\$	1,865,447	\$	-	0%	\$ 2,307,334	\$ (441,887)	\$ 2,314,476 \$ (7,142)
	Services and Supplies	\$	3,797,988	\$	1,323,839	35%	\$ 1,338,790	\$ 2,459,198	\$ 1,255,871 \$ 82,919
	Capital Outlay	\$	-	\$	-	0%	\$ -	\$ -	\$ - \$ -
Total Expenditures		\$	5,663,435	\$	1,323,839	23%	\$ 3,646,125	\$ 2,017,310	\$ 3,570,347 \$ 75,778
						Net Position	\$ 7,933	\$ 48,180	\$ (40,247)
						(Projected Ending Cash)		Within Budget	
						Expenditures under budget % >>		35.6%	



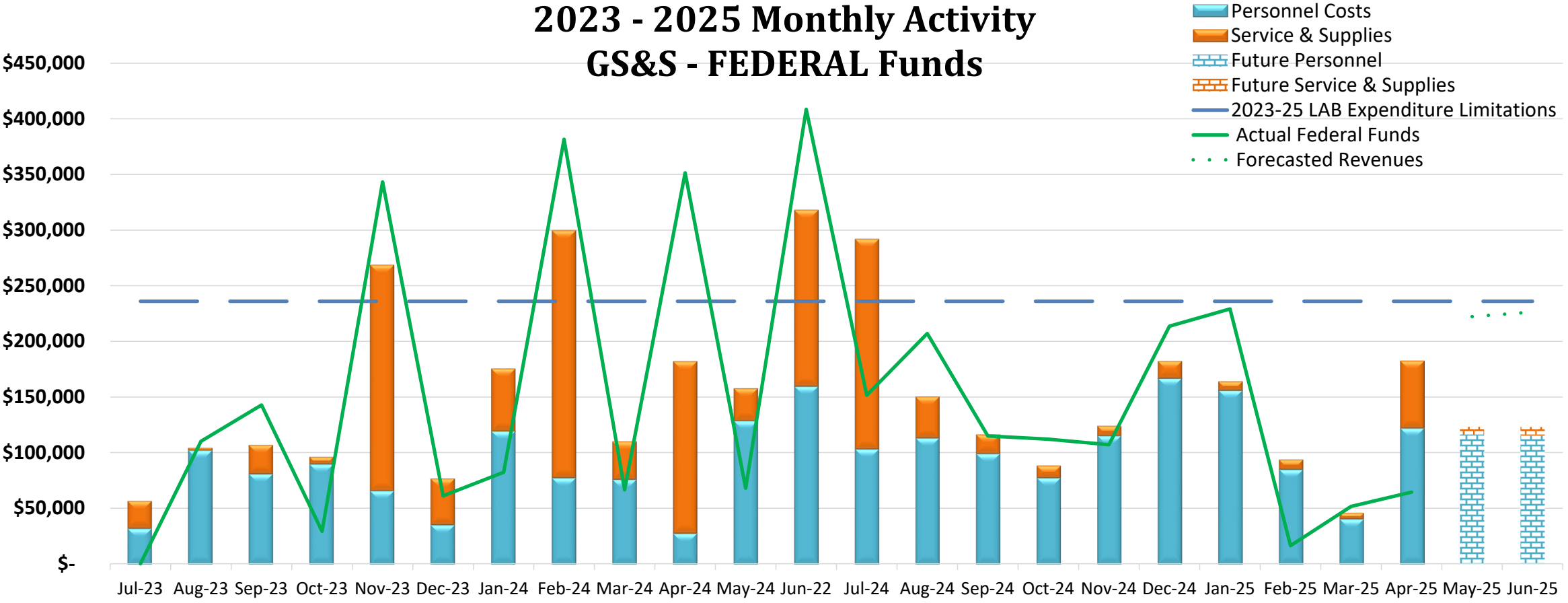
# 2023 - 2025 Running Balance: Budget to Spending GS&S - FEDERAL Funds

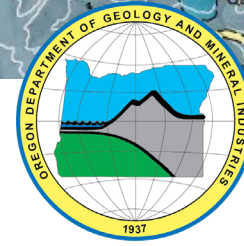






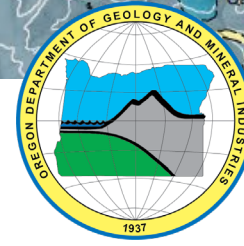
# 2023 - 2025 Monthly Activity GS&S - FEDERAL Funds



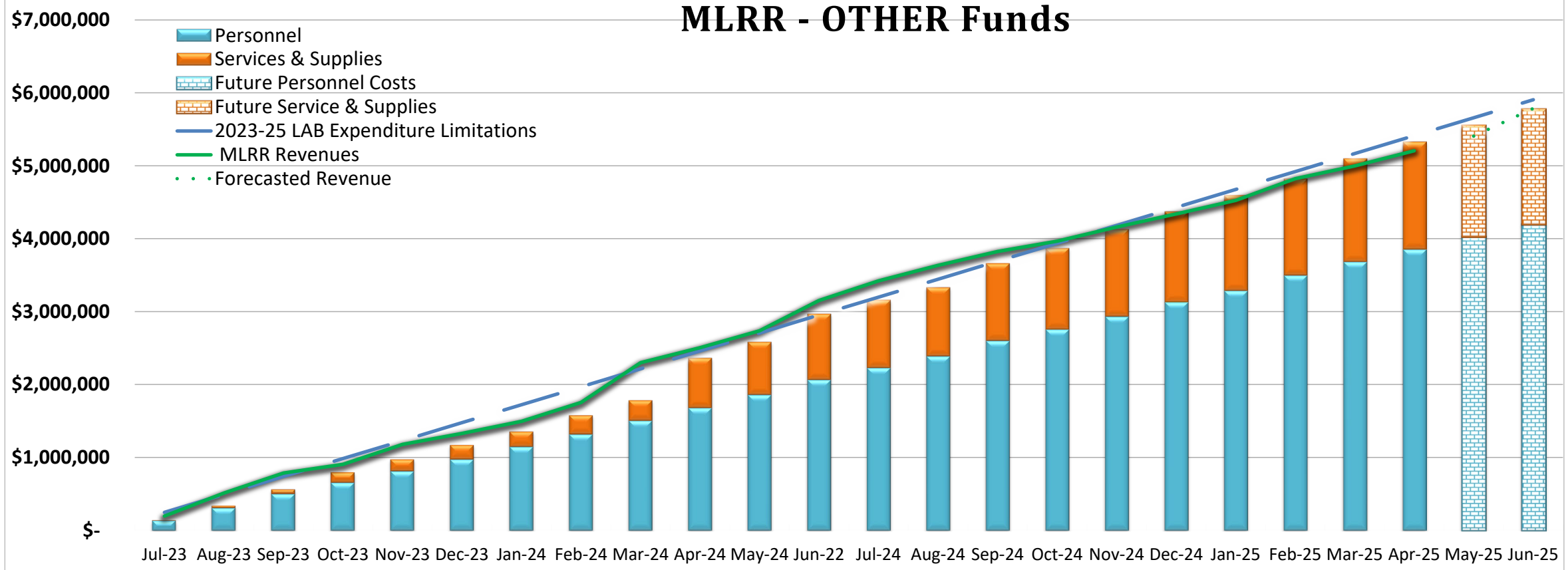


MLRR - OTHER FUNDS - Appn 30210		Legislative Adopted Budget		Revenue & Expenditures		Projections	Difference Budget to Projection Under/(Over)		March Board Meeting	Change
Appropriation: \$5,155,426				Actuals to Date	% Spent					
SalPot Adjustment \$310,752		April 2025								
Beginning Balance:										
	Beginning Balance	\$ 346,829	\$ 1,190,221	N/A	\$ 1,190,221					
Revenue:										
	Revenue:	\$ 5,129,375	\$ 5,205,538	N/A	\$ 5,787,179	\$ 657,804	\$ 5,756,365	\$ 30,814		
Expenditures:										
	Personal Services	\$ 4,129,107	\$ 3,852,912	93%	\$ 4,192,516	\$ (63,409)	\$ 4,193,043	\$ (527)		
	Services and Supplies	\$ 1,776,319	\$ 1,478,147	83%	\$ 1,582,402	\$ 193,917	\$ 1,582,326	\$ 76		
	Capital Outlay	\$ -	\$ -	0%	\$ -	\$ -	\$ -	\$ -		
Total Expenditures		\$ 5,905,426	\$ 5,331,059	90%	\$ 5,774,918	\$ 130,508	\$ 5,775,369	\$ (451)		
						Net Position	\$ 1,202,482	\$ 1,171,217	\$ 31,265	
						(Projected Ending Cash)	Within Budget			
Expenditures under budget % >>							2.2%			
6-Month Operating Reserve % >>							92.5%			

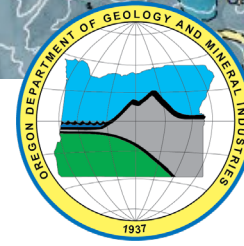
Includes Expenditure limitation increase of \$750,000 (December 2024 E-Board)



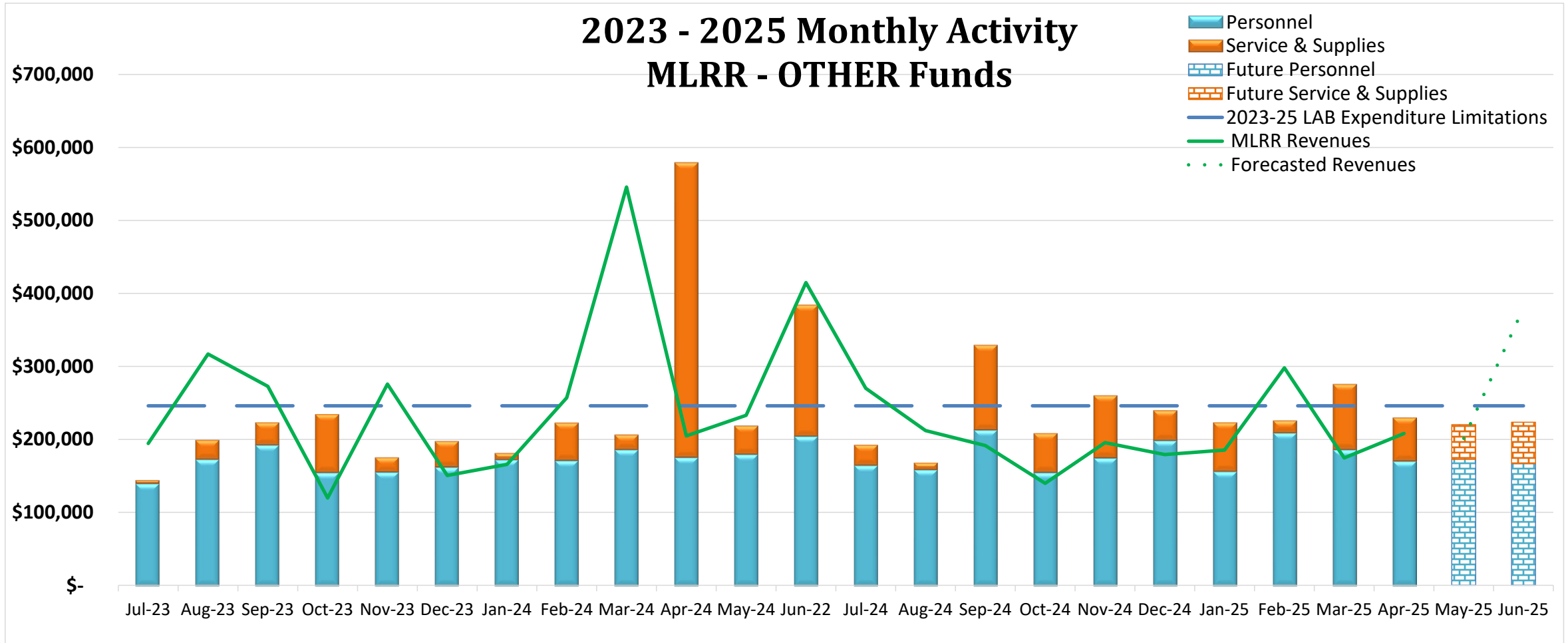
# 2023 - 2025 Running Balance: Budget to Spending MLRR - OTHER Funds

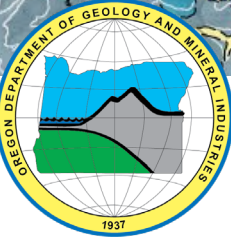






## 2023 - 2025 Monthly Activity MLRR - OTHER Funds





MLRR - GENERAL FUND - Appn 80210		Legislative Adopted Budget		Revenue & Expenditures		Projections	Difference Budget to Projection Under/(Over)	March Board Meeting Change	
Appropriation: \$2,060,023				Actuals to Date	% Spent				
SalPot Adjustment \$60,023		April 2025							
Revenue:									
	GF Appropriation:	\$ 2,060,023	\$ 2,060,023		N/A				
Expenditures:									
	Personal Services	\$ 660,442	\$ 5,496		1%	\$ 16,438	\$ 644,004	\$ 47,615	\$ (31,177)
	Services and Supplies	\$ 1,399,581	\$ 165		0%	\$ 99,276	\$ 1,300,305	\$ 559,442	\$ (460,166)
	Capital Outlay	\$ -	\$ -		0%	\$ -	\$ -	\$ -	\$ -
Total Expenditures		\$ 2,060,023	\$ 5,661		0%	\$ 115,714	\$ 1,944,309	\$ 607,057	\$ (491,343)
						Net Position	\$ 1,944,309	\$ 1,452,966	\$ 491,343
ePermitting Project		(Projected Ending Cash)				Within Budget			
		Expenditures under budget % >>				94.4%			

# Staff Report and Memorandum

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To: Chair, Vice-Chair, and members of the DOGAMI Governing Board

From: Christina Appleby, Legislative Coordinator & Geologist

Date: June 17, 2025

**Regarding: Agenda Item 8 – Legislative Update**

Christina Appleby, Legislative Coordinator, will give a Legislative Update.

***Proposed Board Action: The Board will not be asked to take an action on this item.***

# Staff Report and Memorandum

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To: Chair, Vice-Chair, and members of the DOGAMI Governing Board

From: Ruarri Day-Stirrat, Director & State Geologist

Date: June 17, 2025

**Regarding: Agenda Item 9 – Budget Update**

Ruarri Day-Stirrat, Director & State Geologist, and Steve Dahlberg, Chief Financial Officer, will provide an update on the 2025-27 Agency Budget for DOGAMI.

***Proposed Board Action: The Board may be asked to take an action on this item.***

# Staff Report and Memorandum

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To: Chair, Vice-Chair, and members of the DOGAMI Governing Board

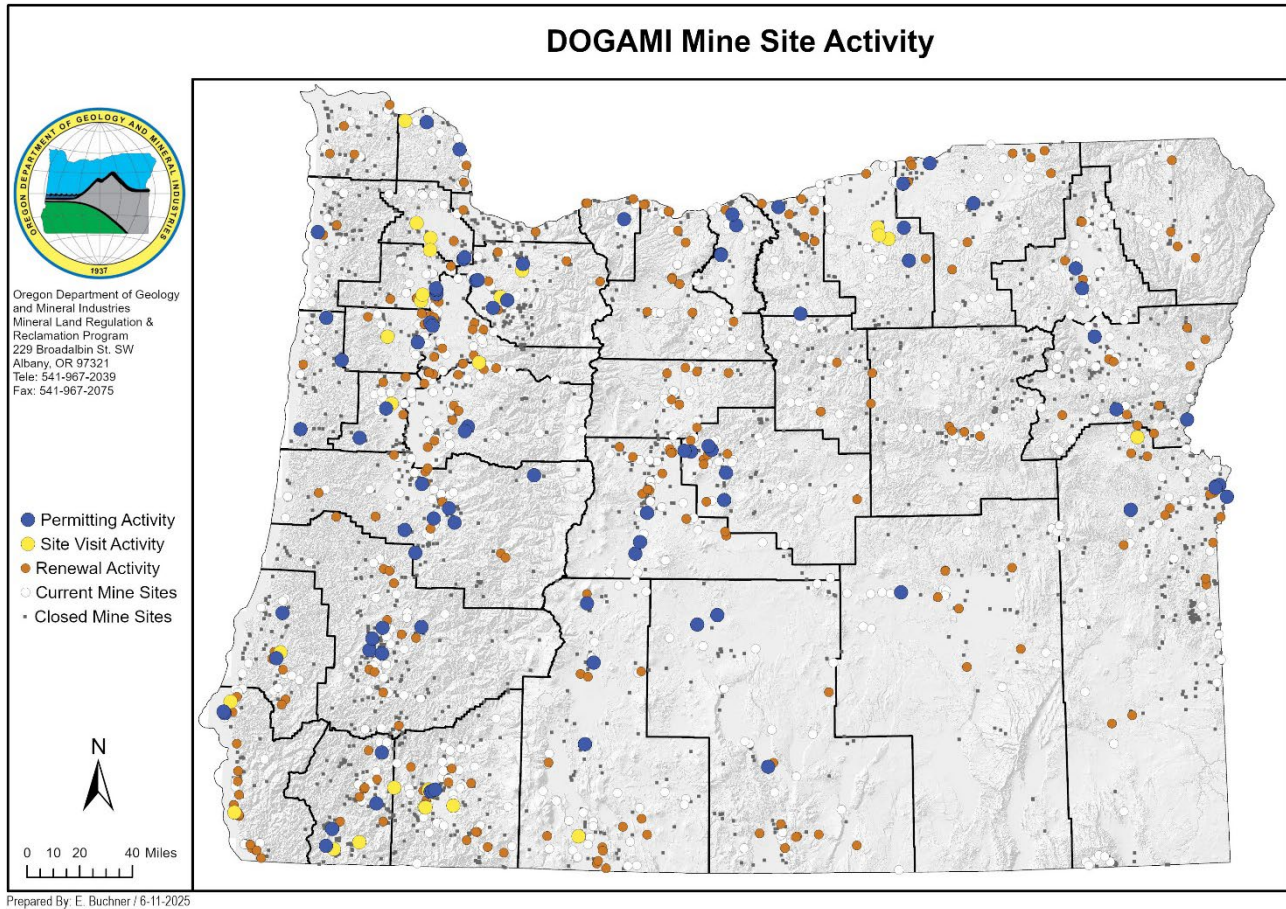
From: Sarah Lewis, MLRR Program Manager

Date: June 13, 2025

**Regarding: Agenda Item 10 – MLRR Update**

Sarah Lewis, MLRR Program Manager, will provide an MLRR Program update.

***Proposed Board Action: The Board will not be asked to take action on this item.***

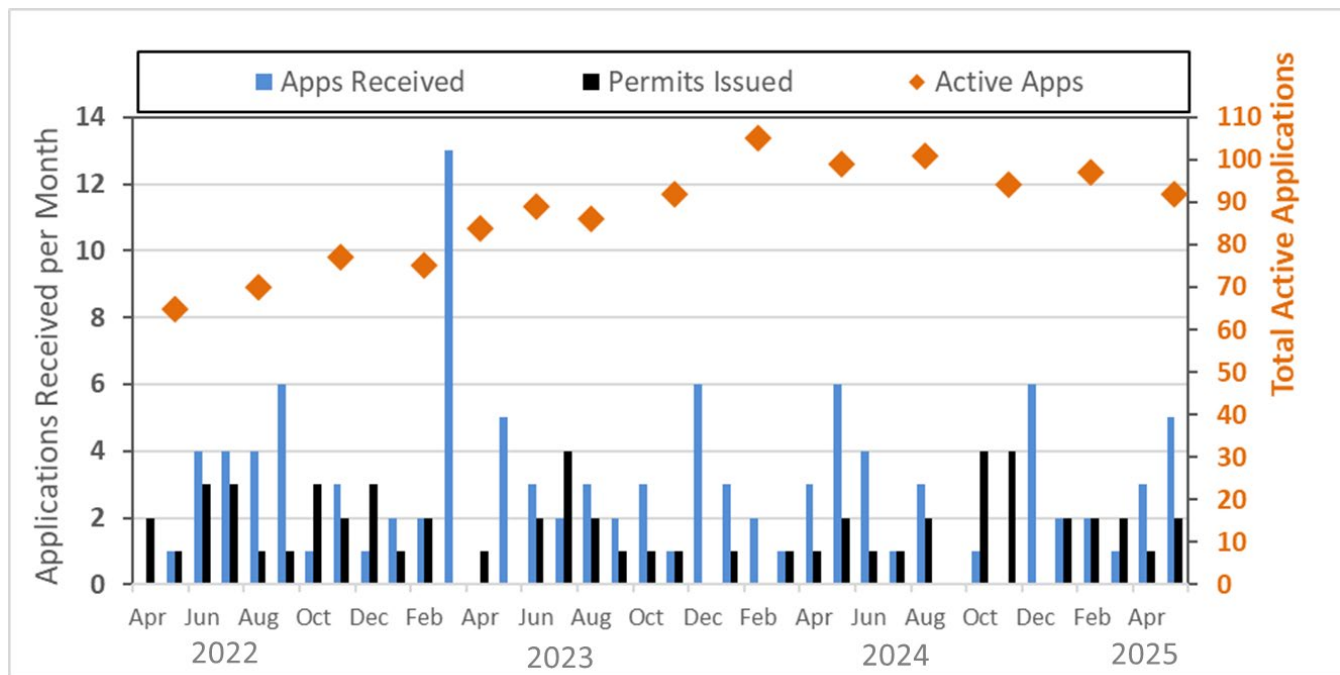


Map shows aggregate/non-aggregate active permitting applications, site visits in the last 6 months, and renewals due in last 3 months.

**Table 1: Permit Status Summary (as of 6/6/25)**

	Aug 2024		Nov 2024		Feb 2025		May 2025	
	Permits	Apps	Permits	Apps	Permits	Apps	Permits	Apps
<b>Surface Mining</b>								
Operating Permits	888	84	890	82	890	84	899	87
Exclusion Certificates	142	2	144	1	144	2	149	4
Sites Closed	0	7	0	8	2	6	1	6
<b>Water Quality (DEQ)</b>								
1200A Permits	156	11	154	9	155	11	155	11
WPCF 1000 Permits	53	3	50	3	52	4	52	4
<b>Exploration</b>	28	17	28	12	27	13	28	5
<b>Oil &amp; Gas Wells</b>	75	1	75	1	70	1	70	1
<b>Geothermal</b>								
Well Permits	21	0	21	1	21	1	22	0
Prospect Wells	4	0	4	0	4	0	4	0

Figure 2a: Operating and Exploration Permit Application Workload (as of 6/6/25)



The average processing time for an application completed during the last year exceeded 12 months.

Figure 2b: Application Processing Status (6/6/2025)

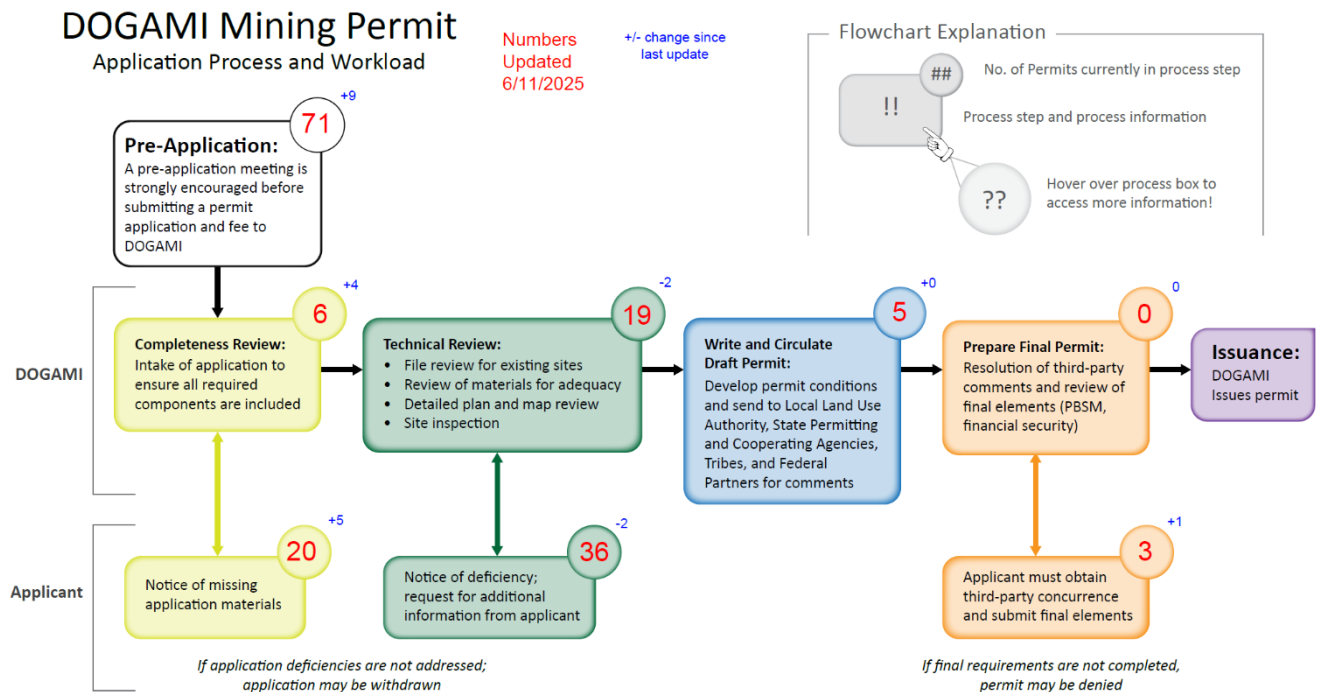




Table 2a: Permit Applications received since last update:

Site ID#	Application Type	Permit Type*	Date Received
10-0230	New	EC	3/11/2025
10-0226	Amendment	XP	3/12/2025
24-0106	New	EC	3/18/2025
23-0306	New	OP	3/31/2025
22-0159	New	EC	4/1/2025
22-0069	Transfer	OP-LE	4/1/2025
22-0099	Transfer	OP-LE	4/1/2025
10-0231	New	EC	4/7/2025
21-0065	Amendment	OP	4/14/2025
23-0291	Amendment	XP	4/18/2025
23-0255	Amendment	OP	5/1/2025
03-0228	New	EC	5/5/2025
23-0157	Amendment	OP	5/12/2025
09-0025	Transfer	OP-LE	5/12/2025
01-0075	New	CX	5/15/2025
10-0071	Transfer	OP-LE	5/19/2025
10-0053	Transfer	OP-LE	5/19/2025
10-0213	Transfer	OP	5/19/2025

**Key to Permit Type\***OP = Operating  
PermitXP = Exploration  
PermitLE = Limited  
ExemptionEC = Exclusion  
Certificate

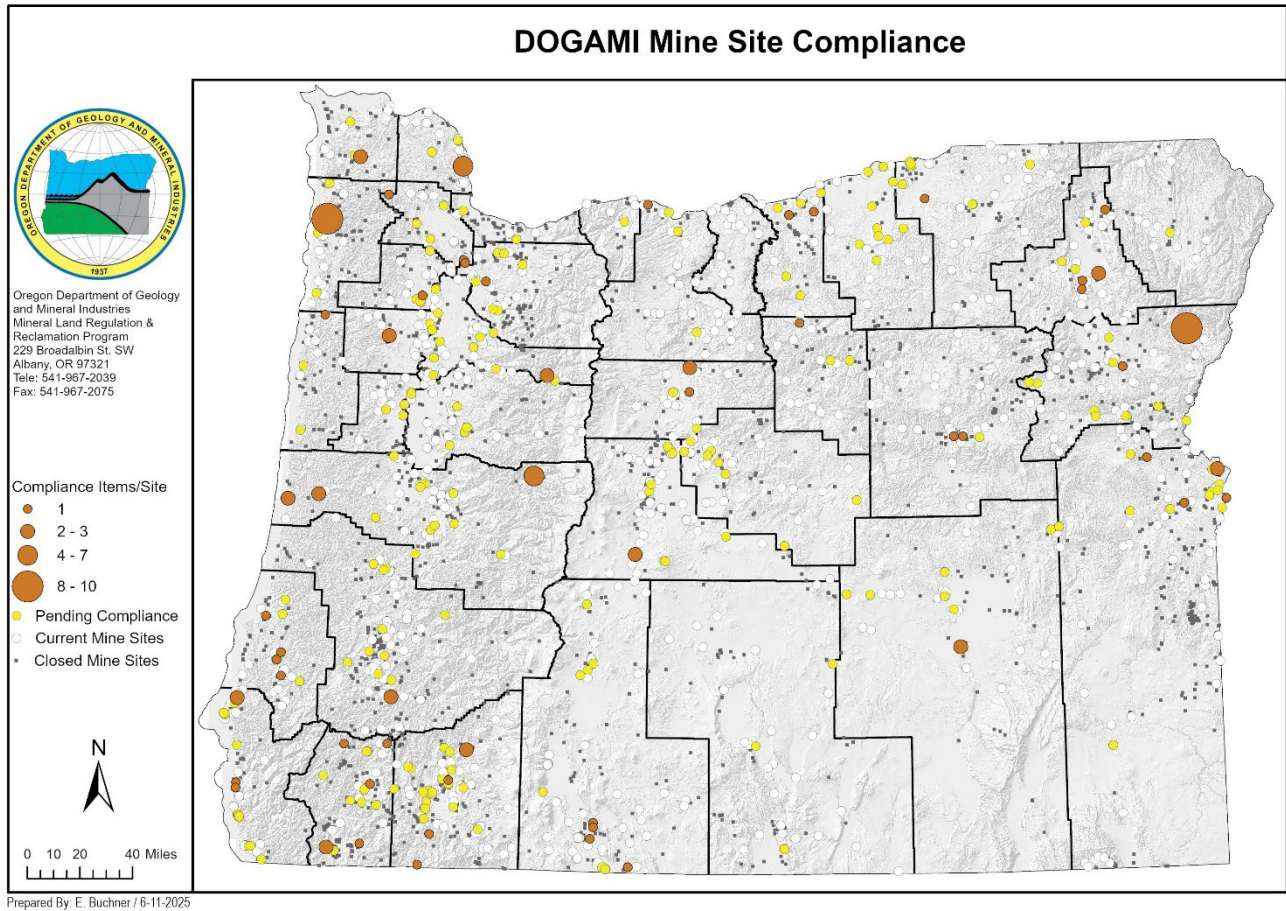
CX = County Exempt

Table 2b: Decisions issued since last update:

Site ID#	Application Type	Permit Type*	Date Received	Date Issued	Decision
23-0305	New	EC	2/10/2025	3/12/2025	Denied
23-0304	New	EC	2/4/2025	3/21/2025	Issued
05-0004	Transfer	OP	6/9/2022	3/20/2025	Issued
23-0292	Amendment	XP	11/22/2023	3/25/2025	Denied
23-0294	New	XP	11/22/2023	3/25/2025	Denied
23-0295	New	XP	11/22/2023	3/25/2025	Denied
23-0296	New	XP	11/22/2023	3/25/2025	Denied
23-0297	New	XP	11/22/2023	3/25/2025	Denied
23-0298	New	XP	11/22/2023	3/25/2025	Denied
23-0299	New	XP	11/22/2023	3/25/2025	Denied
23-0303	New	XP	11/22/2023	3/25/2025	Denied
18-0061	Closure	EC	1/23/2025	3/26/2025	Closed
10-0230	New	EC	3/11/2025	3/28/2025	Issued
22-0022	Amendment	OP-LE	6/21/2024	4/18/2025	Issued
24-0106	New	EC	3/18/2025	4/25/2025	Issued
22-0159	New	EC	4/1/2025	4/25/2025	Issued
01-0224	New	XP	2/7/2024	4/29/2025	Issued
23-0269	Closure	OP	11/18/2022	5/6/2025	Closed
17-0161	New	EC	10/13/2023	5/9/2025	Issued
24-0091	Amendment	OP	7/7/2022	5/15/2025	Issued
01-0075	New	CX	5/15/2025	5/15/2025	Registered
10-0226	Amendment	XP	3/12/2025	6/2/2025	Issued
10-0228	New	OP	7/6/2021	6/5/2025	Withdrawn



## Compliance Activity at DOGAMI Mine Sites



Location of potential (yellow dots) and active (graduated orange dots) compliance actions from Table 3. Size of circle indicates number of violations per site.

**Table 3a: Compliance Summary – Active Violations by Type (as of 6/6/25)**

	2023			2024				2025	
	Jun	Sep	Nov	Feb	Jun	Sep	Nov	Mar	Jun
<b>Non-Payment of Fees</b>	34	45	29	26	29	35	35	46	<b>35</b>
<b>Exploring Without a Permit</b>	1	1	0	0	0	0	0	0	<b>0</b>
<b>Mining Without a Permit</b>	14	14	14	14	13	13	13	14	<b>14</b>
<b>Mining Outside Permit Boundary</b>	22	22	20	20	19	20	20	20	<b>18</b>
<b>Lack of Approval</b>	4	4	4	4	4	4	4	4	<b>4</b>
<b>Failure to Comply with Order</b>	9	13	16	16	14	12	12	12	<b>12</b>
<b>Permit Boundary Survey Map</b>	5	5	5	5	0	0	0	0	<b>0</b>
<b>Boundary Marking Violation</b>	4	4	4	4	4	4	4	4	<b>4</b>
<b>Permit Condition Violation</b>	13	13	7	7	5	5	5	5	<b>5</b>
<b>Reclamation Security</b>	7	7	5	5	2	2	2	2	<b>2</b>
<b>Failure to Reclaim Timely</b>	1	1	1	1	1	1	1	1	<b>0</b>
<b>Total</b>	<b>114</b>	<b>129</b>	<b>105</b>	<b>102</b>	<b>91</b>	<b>96</b>	<b>96</b>	<b>108</b>	<b>94</b>

Table 3b: Compliance Summary – Active Department Orders by Type (as of 6/6/25)

<b>Total Active Department Orders</b>		
<b>Order Types</b>	<b>Administrative Orders (change since last report)</b>	<b>Environmental/ Permit Orders (change since last report)</b>
Notice of Violation	29 (-9)	1 (-1)
<b>Suspension Order</b>	2	13 (-1)
NCP Referral	5 (+1)	0
Notice of Civil Penalty	11	2
Final Order	1	0
Consent Order	0	0
Demand Warning	0	0
Notice of Intent	1	0
Demand to Recover	0	0
Notice of Action	1	8 (-1)

Table 3c: Compliance Summary – Active Suspension Orders (as of 6/6/25)

<b>Total Active Suspension Orders (*Civil Penalty Issued)</b>		
<b>Site Suspended</b>	<b>Date Suspended</b>	<b>Reason for Suspension</b>
23-0234	08-Apr-12	Legacy issue needs resolution. Issued in 2012 for non-payment.
17-0020	15-Sep-08	Legacy issue needs resolution. Issued in 2008, bond increase required 2007, bond cancellation received 2011.
01-0029	25-Apr-22	Permitted, were operating, Mining in advance of permit approvals.
*06-NP0002	21-Mar-21	No permit, were operating. SO will remain indefinitely, no mining allowed without a permit.
10-0183	9-Aug-19	No Permit - Floodplain site exceeded 5 acres, in permitting since ~2012
*10-0223	28-Jul-17	No Permit - First Civil Penalty for MWOP resulting in Consent Order
15-0116	10-Mar-22	No Permit, were operating
17-0157	14-Apr-22	No Permit, were operating
20-0011	14-Apr-22	Permitted, were operating, were discharging significant quantities of turbid stormwater to the Siuslaw River
20-0158	8-Jul-19	Permitted, excavation outside excavation area. Operating in a limited area.
23-NP0001	8-Mar-23	No Permit, exceeded thresholds. In negotiation for restoration.
27-0001	4-Feb-21	No Permit
*29-0040	11-Mar-21	Permitted, trespassed onto ODF land, action ongoing since ~2017
30-NP0001	24-Feb-25	No permit, were operating. SO will remain indefinitely, no mining allowed without a permit.
34-0011	4-Dec-19	Permitted, no land use acknowledged at transfer, County reported operations to DOGAMI

### Non-Payment of Renewal Fee – Civil Penalty Fact Pattern Matrix (\*as of 6/6/2025)

#	Site ID	Timeline			Days in violation (total)	Late Pay History		Mitigating Factors, Other Considerations (status)	Penalty Amount				*State Geologist Approved
		Renewal Fee Due	Renewal Fee Paid	Civil Pen. Paid		Freq. of occurrence	Length of delay		Max (\$1000+ days)	Standard	Staff Rec.		
66	15-0186	2/28/25	-	-	38 (98)	0/3 yr	None			\$38,000	\$250	\$250	\$250
65	17-0153	12/31/24	-	-	97 (157)	0/3 yr	None			\$97,000	\$250	\$250	\$250
64	15-0217	12/31/24	-	-	97 (157)	0/3 yr	None			\$97,000	\$250	\$250	\$250
63	20-0129	10/31/24	-	-	158 (218)	3/3 yr	Years	Third civil penalty for non-payment		\$158,000	\$750	\$750	\$750
62	18-0141	10/31/24	-	-	158 (218)	0/3 yr	None	Exclusion Certificate		\$158,000	\$100	\$100	\$100
61	34-0048	8/31/24	-	-	219 (279)	0/3 yr	None			\$219,000	\$250	\$250	\$250
60	18-0028	8/31/24	-	-	219 (279)	0/3 yr	None			\$219,000	\$250	\$250	\$250
59	23-0267	5/31/24	9/30/24	9/30/24	62 (122)	1/3 yr	5 mos.	Issued \$500 penalty in 2022		\$62,000	\$750	\$750	\$750
58	20-0018	5/31/24	8/31/24	-	32 (92)	1/3 yr	3-6 mos.			\$32,000	\$250	\$250	\$250
57	09-0118	5/31/24	11/25/24	-	118 (178)	2/3 yr	3-6 mos.	Issued \$500 penalty in 2020		\$118,000	\$750	\$750	\$750
56	08-0106	5/31/24	8/19/24	-	20 (80)	2/3 yr	3-4 mos.	Exclusion Certificate		\$20,000	\$100	\$100	\$100
55	17-0056	4/30/24	-	-	342 (402)	2/3 yr	2-5 mos.	Issued \$750 penalty in 2022		\$342,000	\$1,000	\$1,000	\$1,000
54	25-0006	2/28/24	7/22/24	8/16/24	85 (145)	1/3 yr	2-3 mos.			\$85,000	\$250	\$250	\$250
53	05-0055	10/31/23	1/29/24	-	31 (91)	1/3 yr	3 mos.			\$31,000	\$250	\$250	\$250
52	20-0129	10/31/23	-	-	524 (584)	2/3 yr	1-4 mos.	Issued \$250 penalty in 2022		\$524,000	\$500	\$500	\$500
51	13-0083	8/31/23	-	-	585 (645)	1/3 yr	TBD			\$585,000	\$250	\$250	\$250
50	30-0023	6/30/23	9/28/23	3/7/24	30 (90)	2/3 yr	3 mos.	Issued \$250 penalty in 2020		\$30,000	\$500	\$500	\$500
49	15-0098	4/30/23	9/22/23	-	85 (145)	1/3 yr	1-2 mos.			\$85,000	\$250	\$250	\$250
48	03-0115	2/28/23	5/15/23	N/A	16 (76)	1/3 yr	1-2 mos.	Department error, staff requests reversal		\$16,000	\$250	Waive	Waive
47	17-0160	12/31/22	5/4/23	N/A	64 (124)	None	None	Department error, staff requests reversal		\$64,000	\$250	Waive	Waive
46	20-0068	12/31/22	-	-	740 (800)	None	None			\$740,000	\$250	\$250	\$250
45	32-0040	11/30/22	2/28/23	10/7/23	31 (91)	None	None			\$31,000	\$250	\$250	\$250
44	20-0129	10/31/22	4/19/23	-	110 (170)	2/3 yr	1-2 mos.			\$110,000	\$250	\$250	\$250
43	02-0005	9/30/22	4/10/23	11/8/24	132 (192)	None	None			\$132,000	\$250	\$250	\$250
42	36-0062	9/30/22	6/9/2023	10/4/23	193 (253)	1/3 yr	2 mos.	Issued \$250 penalty in 2022		\$193,000	\$500	\$500	\$500
41	31-0007	8/31/22	-	-	671 (731)	3/3 yr	2-9 mos.			\$671,000	\$250	\$250	\$250

\*Board Delegated Approval Authority to State Geologist on 6/25/2021.

## Other MLRR Project Status Updates

### **ePermitting Project– IT Modernization**

- The ePermitting Project is in the Project Planning Phase.
- In late March, the Project Team formally kicked off project work and began weekly meetings with DOGAMI and DEQ staff, Enterprise Information Services (EIS), and Department of Administrative Service (DAS).
- Priority items include drafting the Contract, development of Project Management documents and plans, and review of DOGAMI processes and business requirements.
- Contract completion and engagement with the vendor is anticipated in July 2025.
- The project timeline and budget will be re-baselined once work with the vendor begins.
- The project is on track for completion in the 2025-27 biennium.

### **Grassy Mountain Gold Mine Project – Consolidated Permit for Chemical Process Mining**

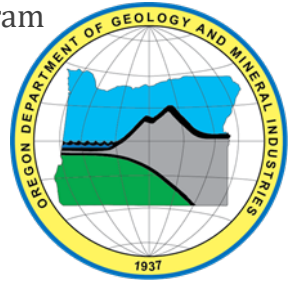
- The Grassy Mountain Project is in the Permit Drafting Phase.
- On May 7, 2025, DOGAMI communicated to Calico a list of outstanding items needed to complete drafting state permits and conditions, and a list of issues that need resolution prior to the issuance of final permits.
- The timeline for drafting state permits and conditions has been extended, but the development of the Consolidated Permit by DOGAMI is ongoing.
- DOGAMI continues to coordinate with the BLM and the applicant to align the state and federal process to the maximum extent possible.
- A TRT meeting was held June 16, 2025 to review Reclamation Security requirements.
- All project documents are available on DOGAMI's website:  
[https://www.oregon.gov/dogami/mlrr/Pages/chemicalprocess\\_Calico-GrassyMtn.aspx](https://www.oregon.gov/dogami/mlrr/Pages/chemicalprocess_Calico-GrassyMtn.aspx)



# ENGAGe

Spring 2025

*Exploration, Non-aggregate, Gas/oil, Aggregate, Geothermal*



## DOGAMI Permitting Timelines

**Reminder:** DOGAMI continues to experience an unprecedented volume of applications, inquiries, complaints, and compliance actions that has resulted in an increase in processing and response times. Thank you for your patience as we work through our increased workload.

Here are some things you can do to help the application process along:

- Set up a pre-application meeting with our staff to discuss your surface mining project and identify requirements and any additional considerations.
- If you are amending your permit or interested in past information about a site, request a copy of the site file via a Public Records Request (PRR). *Please note there may be a fee for a PRR submitted by anyone other than the current permittee.*
- Submit applications that are as *administratively complete* (have all the required elements) and *technically sound* (accurately reflect your proposed plans) as possible to prevent requests for additional information and reduce necessary revisions.

To increase the effectiveness of your communications:

- Send detailed questions *via email if possible* – the more specific you can be about your question or request, the faster we can get back to you or route your inquiry to the appropriate resource. Always include the DOGAMI Site ID number, if you have one.
- Consolidate messages into a single email so your questions can be answered all at once; receiving multiple emails over a few days will increase the time it takes to prepare a thorough response.

***DOGAMI strives to process permit applications as quickly as possible to facilitate applicant/permittee compliance with Oregon law. We appreciate your patience and understanding.***

## ENGAGe Feature: Public Records Request Website!

IT'S FINALLY HERE! A website that tells you how to request public records from DOGAMI! I (Becky Johnson, Office Operations Assistant and Public Records Manager for the MLRR Program) had to go shout it out in nature I was so excited (see picture on right).

Now instead of emailing one of the permitting staff or calling your favorite Reclamationist, the email address is right on the website, along with what needs to be included with your request! Also included on the website is the fee schedule set by the Department of Administrative Services. If you ever have questions About public records or making a public records request – you know where to go: <https://www.oregon.gov/dogami/mlrr/Pages/public-records-requests.aspx>



Contact us at 541-967-2039 [mlrr.info@dogami.oregon.gov](mailto:mlrr.info@dogami.oregon.gov)

<https://www.oregon.gov/dogami/mlrr>

Oregon Department of Geology and Mineral Industries

Mineral Land Regulation & Reclamation

229 Broadalbin St. SW, Albany, OR 97321

## DOGAMI TALK: Exclusion Certificates

Over the past six months, there has been a significant increase in Exclusion Certificate (EC) applications. As such, we felt it timely to provide a refresher on what ECs are, clarify the circumstances in which an EC is not required (though we remain available to assist if there is any uncertainty), and offer some practical guidance to support applicants throughout the process.



To start, we've expanded our EC application processing team! Becky Johnson, Office Operations Assistant is still happy to answer general questions, while Nicole Ledbetter, GIT (seen in photo on left with Ceasar the No Drama Llama), who is one of MLRR's wonderful "new" Permit Specialists. Nicole started with the Department back in May 2024 and has already become an integral part of our team.

Now to jump in with a refresher. **Exclusion Certificates** are certificates that are required for mining activity that removes less than 5,000 cubic yards and affects less than one acre of land within a 12-month period. [Operating Permits are required for mining activities above these thresholds.] You can find the statute that governs Exclusion Certificates under ORS 517.753 and the administrative rule under OAR 632-030-0016. We have a very helpful FAQ regarding ECs that can be found on our website: [https://www.oregon.gov/dogami/mlrr/forms/sufacemining/20220818\\_OP\\_EC\\_XP\\_byLaw\\_AgencyLogo.pdf](https://www.oregon.gov/dogami/mlrr/forms/sufacemining/20220818_OP_EC_XP_byLaw_AgencyLogo.pdf)

### Applying for an EC:

When you apply for an EC, you are required to submit 3 things: a completely and correctly filled out application, proof of land ownership (which comes in the form of a listing packet or "TRIO" from your local title company), and an \$80 fee (currently; that is subject to change). Things we often see with applications that are incorrect:

- Missing TRIO (it is free for you to request this from your local title company)
- Incorrect legal description (if this is wrong it will get your application denied, please double check)
- Date mining activities began/if the area was mined (we have the ability to check... Please be honest)
- Signatures (we need ALL landowner and mineral owner signatures – except BLM)

**\*\*IF YOU HAVE QUESTIONS – PLEASE CONTACT US BEFORE SUBMITTING YOUR APPLICATION!\*\***

### Exemptions to needing an EC:

Road Building: If you are excavating and building roads/doing road maintenance for a farm or logging roads on a farm or on the tax lot that the logging roads exist on, and none of the product from your excavation is being sold – you don't need an EC. If your excavation area is in one location and you have to drive on a public road, highway, or across someone else's property to get to the roads you want to build or maintain - you would need an EC. Questions about whether your situation would be exempt? Contact us – **541-967-2039** or [mlrr.info@dogami.oregon.gov](mailto:mlrr.info@dogami.oregon.gov)

Exclusion Certificate Closure– DOGAMI requires a minimum of 30 days notice **before** your renewal is due for closure requests. If you are not planning on renewing your EC for the next year, make sure you are giving us written notice at least 30 days before your renewal is **due**. More time is always appreciated! This includes instances where you want to "transfer" your Exclusion Certificate. DOGAMI doesn't have statutory authority to transfer ECs, so we need a written request 30 days before the renewal due date from the current certificate holder to close the site, before we can process a new EC application for the same site.

*If you'd like to receive this newsletter via email, sign up for our listserv:*  
<https://omls.oregon.gov/mailman/listinfo/mlrr.newsletter>

# Staff Report and Memorandum

---

To: Chair, Vice-Chair, and members of the DOGAMI Governing Board

From: Jason McClaughry, GS&S Program Manager

Date: June 13, 2025

**Regarding: Agenda Item 11 – GS&S Update**

Jason McClaughry, GS&S Program Manager, will provide an update on the GS&S program.

***Proposed Board Action: The Board will not be asked to take action on this item.***

**June 24, 2024**

**Agenda Item 11 – GS&S Update**

This is a report of Geological Survey and Services Program (GS&S) activities since the last presentation to the Board on March 25, 2025. Staff remain focused on working on existing projects, closing out others, and developing new project ideas and concepts to explore, within DOGAMI’s mission. Our current active grant load is 29 non-lidar grants (15 federal fund, 14 other fund) and 3 Lidar projects. Potential grant opportunities continue to grow in the areas of: 1) landslide inventory and risk reduction; 2) post-wildfire landside and debris flows; 3) channel migration and flood zone analysis; 4) natural hazard risk assessments; 5) earthquake hazard analysis; 6) tsunami inundation model analysis and coastal geomorphology; 7) geologic mapping in support of groundwater studies, mineral resource evaluations, and geologic hazards; 8) carbon sequestration; and 9) critical mineral resource inventories.

**Publications**

Since the last board update March 25, 2025, 3 new publications were released by the GS&S Program (Figure 1; Table 1): DOGAMI has released 7 formal publications in 2025.

**Figure 1. Chart showing DOGAMI publication output since 2016.**

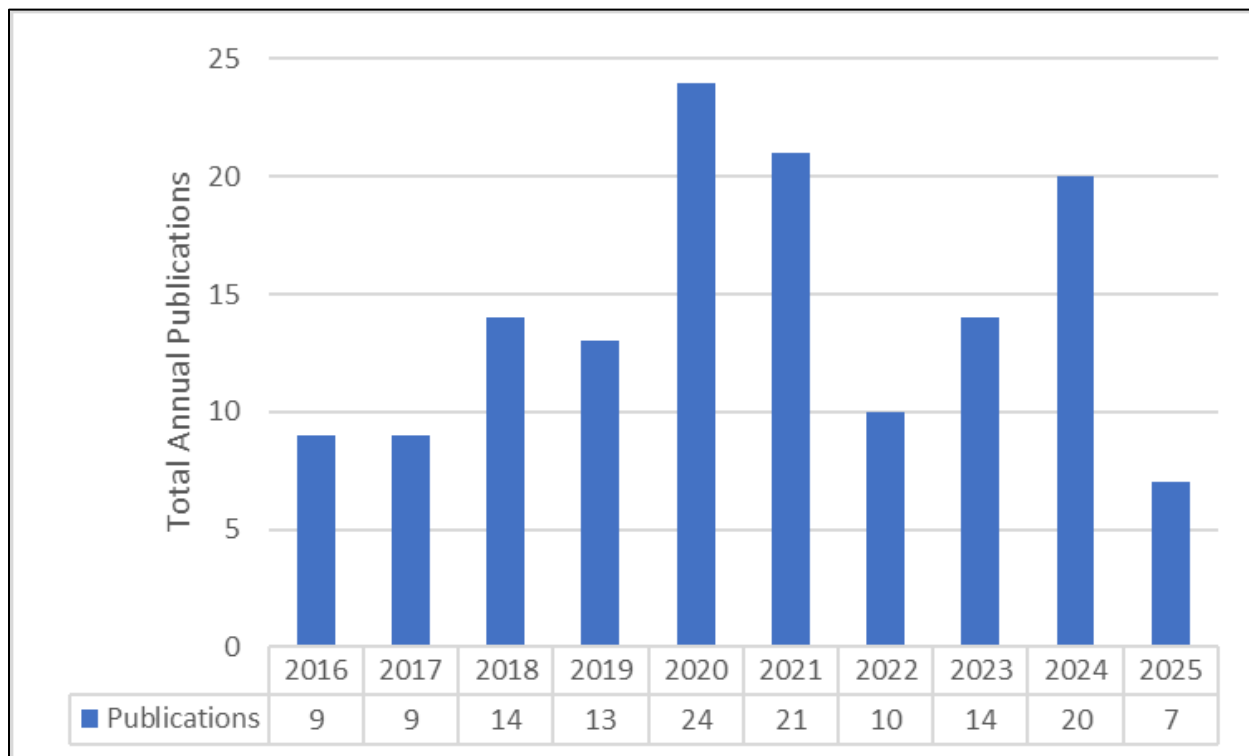




Table-1. Table showing DOGAMI publications released in 2025.

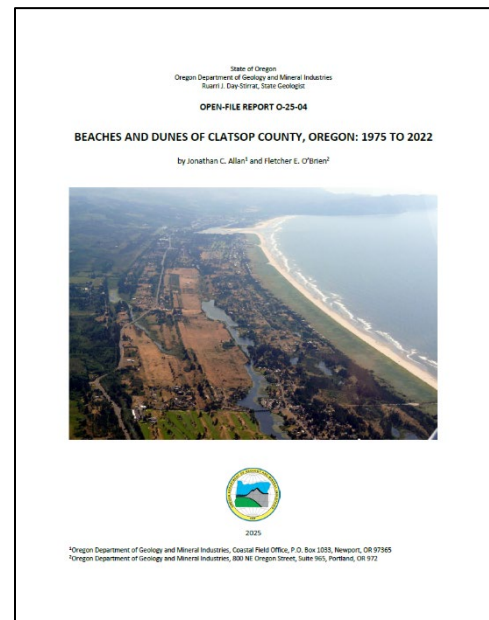
Publication Series	Publication Series No.	Title	Year
Open-File Report	O-25-01	Earthquake and tsunami impact analysis for the Oregon Coast	2025
Open-File Report	O-25-02	Ecola State Park Landslide Risk Analysis, Clatsop County, Oregon	2025
Open-File Report	O-25-03	Landslide Inventory Map of Western Hood River County, Oregon	2025
Special Paper	SP-55	Multitemporal LIDAR Analysis of Pre- and Post-Eagle Creek Fire Debris Flows, Western Columbia River Gorge, Hood River and Multnomah Counties, Oregon	2025
Open-File Report	O-25-04	Beaches and Dunes of Clatsop County, Oregon: 1975 to 2022	2025
Open-File Report	O-25-05	Path Distance Tsunami Modeling for Oregon Tsunami-Hazard Zones	2025
Digital Data Series	OGDC-8	Oregon Geologic Data Compilation, release 8	2025

### Recently released DOGAMI publications

1. **Open-File Report O-25-04, Beaches and Dunes of Clatsop County, Oregon: 1975 to 2022, by Jonathan C. Allan and Fletcher E. O'Brien;** <https://www.oregon.gov/dogami/pubs/Pages/ofr/p-O-25-04.aspx>

#### WHAT'S IN THIS REPORT?

New lidar-based mapping along the Clatsop County coast provides updated spatial extents of beach and dune features exposed to existing and future storm-induced wave erosion, runup, overtopping, and coastal flooding. Side-by-side comparisons between 1975 and the latest mapping of beach and dune features highlight important spatial changes in coastal geomorphology that have taken place.



2. **Open-File Report O-25-05, Path Distance Tsunami Modeling for Oregon Tsunami-Hazard Zones**, by Jonathan C. Allan and Fletcher E. O'Brien;  
<https://www.oregon.gov/dogami/pubs/Pages/ofr/p-O-25-05.aspx>

#### WHAT'S IN THIS REPORT?

The Oregon Coast is threatened by tsunamis originating from megathrust earthquakes on the Cascadia Subduction Zone as well as from distant earthquake sources, the nearest being Alaska. This GIS data release includes path distance evacuation modeling for all five local Cascadia and two Alaska distant tsunami inundation scenarios. These data are the basis for undertaking tsunami evacuation modeling.



3. **Oregon Geologic Data Compilation, release 8 (OGDC-8)**, compiled by Michael H. Darin, Jason D. McLaughry, Carlie J.M. Azzopardi, Jon J. Franczyk, and Ian P. Madin;  
<https://www.oregon.gov/dogami/pubs/Pages/dds/p-OGDC-8.aspx>

#### WHAT'S IN THIS REPORT?

The Oregon Geologic Data Compilation, Release 8 (OGDC-8), consists of a single consistent and maintainable geodatabase containing the most up-to-date geologic mapping data for the state. This update includes a recently published geologic map of the greater Portland metropolitan area by Wells and others (2020, USGS SIM-3443) that covers ~5,400 km² (~2,085 mi²) in Oregon. A series of six accompanying plates includes time-rock charts that show the ages and stratigraphic correlations among the hundreds of geologic map units at the Terrane/Group-level for the entire state and the Formation-level in five distinct regions.



### ***Upcoming DOGAMI publications***

- Multi-hazard risk assessment of Harney County, Williams
- Cascadia Subduction Earthquake Damage and Loss Estimates for the Eugene-Springfield Urban Area, Guererro
- Debris flow risk and risk reduction in post-fire areas of Western Oregon, Burns
- Mineral Information Layer for Oregon – MILO-4, McClaughry
- Geologic Map of the Adams Quadrangle, Azzopardi
- Geology of the South Coast, McClaughry and Darin
- Geologic Map of the Nyssa Quadrangle, McClaughry
- Geologic Map of the Waterman Quadrangle, Guerrero
- Geologic Map of the Capehart Lake Quadrangle, Swenton
- Geologic Map of the Lake on the Trail Quadrangle, Swenton
- Geologic Map of the Moon Reservoir Quadrangle, Azzopardi
- Geologic Map of the Iron Mountain Quadrangle, Azzopardi
- Multi-hazard risk assessment of Yamhill County, Williams
- Multi-hazard risk assessment of Crook County, Williams
- Multi-hazard risk assessment of Klamath County, Williams

## **Grants**

The following grant opportunities are being developed or awaiting funding decisions. They support DOGAMI's mission to provide earth science information to make Oregon safe and prosperous.

### ***Grant applications awaiting decision, contract, or legislative approval***

#### **1. U.S. Geological Survey National Cooperative Geologic Mapping Program, STATEMAP FY25**

- Fulfills goals for *Key Performance Measure 2 – Geologic Map Completion*
- Grant application requesting \$800,000 (Federal Funds). A 50 percent match is required; DOGAMI will contribute \$800,000 in staff time, supplies, and equipment for a total project \$1,600,000.
- Focus Areas:
  - Project 1 – Geologic mapping in the Ring and Holdman 7.5' Quadrangles in the Walla Walla Basin, northeast Oregon;
  - Project 2 – Geologic mapping in the Mahon Creek and Burns NW 7.5' Quadrangles in the Harney Basin, southeast Oregon;
  - Project 3 – Geologic mapping in the Locust Grove and Wasco NW 7.5' Quadrangles in the Middle Columbia Basin, northern Oregon;
  - Project 4 – Updated Quaternary fault and fold database and map for Oregon
- Project period June 1, 2025 to May 31, 2027
- **Proposal submitted.** Awaiting funding decision.

#### **2. U.S. Geological Survey National Cooperative Geologic Mapping Program, Data Preservation FY25**

- Grant application requesting \$108,500 (Federal Funds). A match is required; DOGAMI will contribute \$108,500 in staff time, supplies, and equipment for a total project \$217,000.

- Focus Area: Continue to scan, archive, and make publicly available historic assay reports through the Mineral Information Layer for Oregon (MILO 4.1).
- Project period June 1, 2025 to May 31, 2027
- **Proposal submitted.** Fully awarded, contracted.

### 3. U.S. Geological Survey National Landslide Hazards Program

- Fulfills goals for *Key Performance Measure 1 – Hazard and Risk Assessment Completion*
- Grant application requesting \$100,000 in Federal Funds. This grant program does not require a funding match however, one ranking criteria for future funding is the level of in-kind matching funds offered by the Agency. Therefore, DOGAMI will contribute a 50% match of \$100,000 in staff time. Total project funding requested is \$200,000. The Agency will charge a full indirect rate.
- This is a new federal opportunity, a result of the passing of 2019-2020 H.R.8810, the National Landslide Preparedness Act. The bill authorized a national landslide hazards reduction program (NLHRP), which includes a grant program directed at U.S. State Geological Surveys.
- Focus Area: The DOGAMI proposal includes debris flow inventory mapping in the Cascade Range and the Coast Range in Oregon. This proactive project is proposed to identify debris flow regions in Oregon, so we understand where the hazard exists and become prepared for future post-fire debris flow hazards. The project will also outline the method, establishing a procedure for future updates. This project will allow DOGAMI to bring on at least one intern to work with the NRS4 Lead staff member. Finally, we will share the data with the communities and discuss ways to use the data to reduce future risk.
- Project period June 2025 to May 2026
- **Proposal submitted.** Fully awarded, contracted.

### 4. FEMA Cooperating Technical Partners (CTP) proposals

- Fulfills goals for *Key Performance Measure 1 – Hazard and Risk Assessment Completion*
- Grant application. FEMA requested DOGAMI to provide three levels of performance for the grant proposals: good, better, best. Therefore, the original total pre-proposal ask ranges from \$733,000 to \$5,255,580 (Federal Funds). This grant program does not require a funding match and can charge a full indirect rate.
- Focus Areas:
  1. Natural Hazard Risk Portal for Oregon in the amount of \$174,300-\$319,100
  2. A Comprehensive Assessment of the Impact of Earthquakes in Oregon Using Hazus in the amount of \$255,000-\$728,358
  3. A Probabilistic Tsunami Modeling Analysis (PTHA) of Clatsop County: A Pilot Study Toward Producing the Next Generation of Tsunami Hazard Maps for Oregon in the amount of \$310,000-\$420,822.
- Project period October 2025 to September 2028.
- **Pre-Proposal stage.** Seeking legislative approval. Proposal submission anticipated in June.

**5. Proposal to the National Tsunami Hazard Mitigation Program (NTHMP) describing tsunami related activities (education, outreach, modeling and mapping)**

- Fulfills goals for *Key Performance Measure 1 – Hazard and Risk Assessment Completion*
- Grant application requesting \$581,295 in Federal Funds (included an estimated \$200,000 to VIMS for modeling; \$14,000 to OEM; 20,000 to OSU). No match is required and full indirect rate can be charged.
- Focus Areas (*Perform tsunami outreach, implement new tsunami probabilistic modeling*)
  - Sustaining support for outreach efforts on the coast with OEM; Refine our tsunami evacuation (auto-generated) routing capabilities; new probabilistic tsunami modeling and exposure analyses for coastal Curry County; support for hosting a tsunami symposium; and support for co-organizing a second tsunami inundation benchmarking workshop
- Project period September 2025 to August 2026
- **Pre-Proposal stage.** Seeking legislative approval. Proposal submission is anticipated in June.

**6. U.S. Geological Survey National Cooperative Geologic Mapping Program, Earth Mapping Resource Initiative (Earth MRI), Geologic Mapping**

- Fulfills goals for *Key Performance Measure 2 – Geologic Map Completion*
- Grant application requesting \$330,00 in federal funding. No state match is required.
- Focus Areas:
  1. Geologic mapping and mineral resource evaluation of the Cornucopia Mining District, Baker County, Oregon
- Project period September 2025 to August 2028
- **Pre-proposal stage.** Legislative approval received. Formal workplan submitted to USGS May 9<sup>th</sup>, 2025. Awaiting feedback from USGS and direction from them to submit final proposal.

**7. U.S. Geological Survey National Cooperative Geologic Mapping Program, Earth Mapping Resource Initiative (Earth MRI), Mine Waste**

- Fulfills goals for *Key Performance Measure 2 – Geologic Map Completion*
- Grant application requesting \$352,908 in federal funding. No state match is required.
- Focus Areas:
  - Priority 1 – Mine Waste inventory in Baker County, NE Oregon.
  - Priority 2 – Mine waste evaluation of the “Hannah Mine”, Nickel Mountain, SW Oregon
  - Priority 3 – Travel to Earth MRI Workshop.
- Project period July 2025 to June 2027
- **Proposal stage.** Legislative approval received. Proposal submitted to USGS May 14<sup>th</sup>, 2025. Awaiting funding decision.

**8. National Science Foundation, Oregon State University, Geophysical characterization of the Boring Volcanic Field**

- Fulfills goals for *Key Performance Measure 2 – Geologic Map Completion*

- Grant application requesting \$236,600 in federal funding as a subcontractor to the grant principle Oregon State University.
- Focus Areas:  
DOGAMI will focus its part of the funding on public engagement, outreach, and education about the Boring Volcanic Field, within the Portland Metro area.
- Project period - 2025 to 2029
- **Pre-proposal stage.** Oregon State University is the lead on the proposal and submitted it to NSF in early June. DOGAMI will be a subrecipient of a larger award.

**9. United States Department of Energy (DOE) in collaboration with Lawrence Berkeley Laboratory (LBL) and the U.S. Department of Energy National Energy Technology Laboratory (DOE-NETL)**

- Grant application requesting \$320,000 (Federal Funds). A 20% match of \$80,000 will be met by DOGAMI staffing and supplies.
- Focus Area: This program supports a broad government-wide approach to upgrading and modernizing infrastructure, including by strengthening critical domestic manufacturing and associated supply chains to maximize the benefits of the clean energy transition as the nation works to curb the climate crisis, empower workers, and advance environmental justice.
- Project period June 1, 2025 to May 31, 2027
- Legislative approval received November 2023.
- **Pending Award and contract.** Awaiting award and funding contract. DOGAMI will be a subrecipient of a larger award.

**10. US Department of Energy Regional Scale Collaboration to Facilitate a Domestic Critical Minerals Future: Carbon Ore, Rare Earth, and Critical Minerals (Core-CM) Initiative**

- Fulfills goals for *Key Performance Measure 2 – Geologic Map Completion*
- Grant application. DOGAMI is requesting funding through two program regions; Core 7 and Core 8. For Core 7, DOGAMI is partnering with a research group
- For Core 7, DOGAMI is partnering with a research group including University of Nevada Reno, California Geological Survey, and Arizona Geological Survey, and University of Utah. DOGAMI will be a subrecipient of the larger possible award, requesting \$200,366 in federal funds. This grant program requires a 20% funding match and can charge a full indirect rate. A 20% match of \$50,177 will be met by DOGAMI staffing and supplies. For Core 8, DOGAMI is partnering with a research group including University Alaska Fairbanks (UAF), Oregon State University, and the Washington Geological Survey for a total budget of federal funds of \$7,500,000. DOGAMI will be a subrecipient of the larger possible award, requesting \$1,830,088 in federal funds. This grant program requires a 20% funding match and can charge a full indirect rate. A 20% match of \$457,934 will be met by DOGAMI staffing and supplies, as well as geophysical data collections over the project area.
- Focus Areas: Region 8 – Regional mapping and rock sampling, analytical work, and airborne data collections of magnetics in NE Grant County and Malheur County. An additional major part of this proposal is targeted community outreach to explain to the public the importance of critical minerals, the need to inventory them, and path forward

to produce them as an economic resource. Region 7 – DOGAMI’s role on this project focuses on community outreach. Collectively, these projects should lead to an expansion of the opportunities for the Northwest Region’s mining industries and reduce the United States reliance on importing these critical minerals.

- Project period June 2025 to May 2028.
- **Pending Award and contract.** Awaiting award and funding contract. DOGAMI will be a subrecipient of a larger award.

## **Staffing**

No update for this report

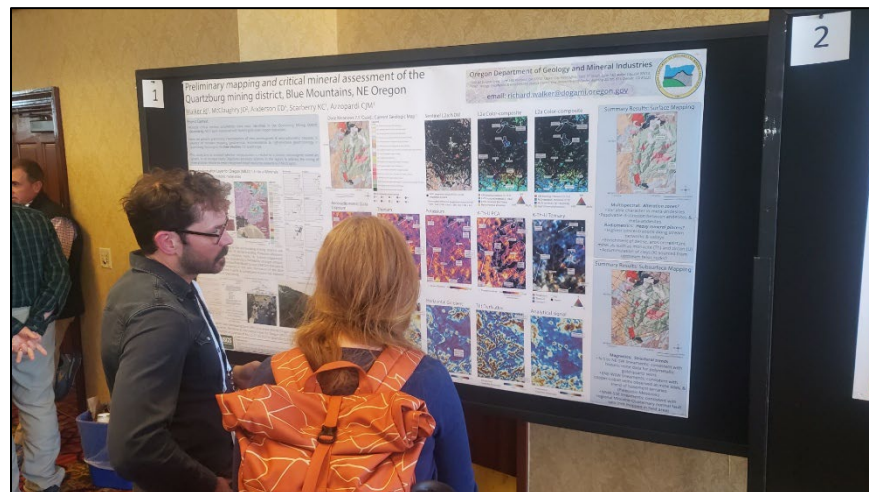
## **GS&S Program Focus: Outreach, engagement, and field work**

The following section describes the activities of DOGAMI scientists recently out and about engaging with communities through outreach and field work.

- **121<sup>st</sup> annual meeting of the Cordilleran Section of the Geological Society of America**

DOGAMI geologists Michael Darin and Richard Walker attended the 121<sup>st</sup> annual meeting of the Cordilleran Section of the Geological Society of America in Sacramento, California, April 1-4, 2025. There they presented posters on recent investigations into critical mineral assessments and terrane accretion in the Cascadia forearc.

**Richard Walker presented how DOGAMI is using a variety of high-resolution geophysical data sets to support our geologic mapping and mineral resource programs. The poster focuses on ongoing USGS Earth MRI-funded geologic mapping in the Quartzburg mining district of NE Oregon.**



**Michael Darin gave a fantastic presentation on evidence for a new model on forearc evolution and terrane accretion in SW Oregon.**





- **Bretz Club, April 25<sup>th</sup>-26<sup>th</sup>, 2025**

Bretz Club brings together Oregon geomorphologists and those studying Oregon geomorphology to encourage new ideas, new friendships, and new collaborations amongst those sharing a love of the Earth's surface. This year's Bretz Club Conference and Field Trip focused on the geomorphic responses of the Klamath River to the 2024 removal of the four large main-stem dams of the Klamath Hydroelectric Project. On the field trip, attendees explored the processes, forms, and curiosities revealed by the exposure of over 2000 acres of former reservoir and a free-flowing Klamath River. Five current DOGAMI employees, one retired DOGAMI geologist, and one DOGAMI board member were in attendance.

**DOGAMI staff and governing board member on a Bretz Club field trip to experience the reclamation activities at the Klamath Dam removal sites.**



- **City of Creswell Arbor Day celebration, April 26, 2025.**

In April, DOGAMI participated in the 2025 Creswell Arbor Day Festival, an event celebrating community connection, environmental awareness, and nature. At the DOGAMI table, visitors of all ages explored educational materials, including mine permitting instructions, earthquake preparedness comics, scenic geology postcards, and the crowd favorite: posters of Willamette River channel migration. Hands-on exhibits featuring rock and fossil kits for attendees to admire, along with a local LIDAR map, engaged visitors in appreciating geology and learning about the ongoing multi-hazard project in Creswell/Cottage Grove. The event provided a great opportunity to connect with the community, answer diverse questions about geology and DOGAMI's work, and promote DOGAMI's mission to increase understanding of Oregon's geology through science and stewardship.

DOGAMI geologists Jessi Wilder and Carlie Azzopardi attended the Creswell Arbor Day event, providing outreach material to the public.



- **Framework Forum GIS meeting, May 15<sup>th</sup>, 2025**

DOGAMI scientist Matt Williams attended and presented at the Oregon Geospatial Enterprise Operations (GEO) Spring Framework Forum at OEM in Salem. The topic of the presentation was to show the progress towards an official data standard for the statewide building footprints dataset. This is the culmination of several months of discussions between Matt and a workgroup of GIS professionals from state and local government, planning organizations, and academia. He presented on how the building footprints dataset was initially developed, identified the data needs of the building footprint data, and the final attribute fields derived from workgroup consensus.

**Matt Williams presented about building footprint data at the Framework Forum GIS meeting.**



- **Volcano Day at OMSI, May 24, 2025**

As public servants, we play a crucial role in promoting resilience and preparedness across Oregon. Our state is home to five potentially active volcanoes—Mount Hood, Mount Jefferson, Newberry Volcano, Three Sisters, and Crater Lake (Mount Mazama). Mount St. Helens lies just north of the Portland Metro area. These volcanoes, part of the Cascade Range, remain under constant monitoring by scientists to detect early signs of unrest. The Oregon Department of Emergency Management (OEM) and the Oregon Department of Geology and Mineral Industries (DOGAMI), in partnership with the U.S. Geological Survey (USGS), are leading statewide efforts to educate, prepare, and protect communities in case of volcanic activity. Governor Tina Kotek has proclaimed [May 18–25, 2025, as Volcano Awareness Week](#), emphasizing the importance of being volcano-ready in Oregon. Outreach for the week included publishing a joint press release with OEM through MYOREGONNEWS. Additionally, DOGAMI scientist Lowell Anthony participated in the Volcano Day event with OEM at OMSI in recognition of the 45<sup>th</sup> anniversary of Mount St. Helens May 1980 eruption. Read the full joint press release with OEM at MYOREGONNEWS-----

[Oregon Declares May 18–25, 2025, Volcano Awareness Week in Recognition of the 45th Anniversary of the Mount St. Helens Eruption](#)

**DOGAMI scientist Lowell Anthony (pictured center) participated in the Volcano Day event with OEM at OMSI in recognition of the 45<sup>th</sup> anniversary of Mount St. Helens May 1980 eruption.**





- **Central Oregon Geoscience Society May 27<sup>th</sup>, 2025.**

On Tuesday evening May 27<sup>th</sup>, Richard Walker visited the Central Oregon Geoscience Society in Bend. Rich gave an excellent talk on Geologic carbon storage possibilities in the Pacific Northwest to the membership in person and on Zoom; <https://www.cogeosoc.org/event-599144>. The event was a great opportunity to engage with Oregonians in this rapidly expanding field.

**DOGAMI geologist Richard Walker presented to the Central Oregon Geoscience Society on Geologic Carbon Sequestration.**



### Field Studies

The landslide team of Bill Burns (pictured), Jessi Wilder (pictured), and Anna Tsitsivas was out and about for fieldwork in the Roseburg area in early May. The team was able to field locate over 300 individual landslides.



**Michael Darin (pictured) and Lowell Anthony conducted mid-May field work mapping in the northern part of the McDermitt caldera in Malheur County, SE Oregon. McDermitt is a focus area for lithium-exploration and DOGAMI-USGS Earth MRI-funded geologic mapping.**



**Conditions were ideal for sample collection and geologic mapping in the Smeltz and Helix 7.5' quadrangles in Umatilla County in mid-May for DOGAMI geologists Lalo Guerrero and Richard Walker (pictured). Highlights include hunting for basalt outcrops in freshly eroded channels in the loess, making observations of possible soft-sediment deformation along the Wallula fault, and getting to say hi to area residents whom we've crossed paths with previously.**





**Carlie Azzopardi, Brittni Bishop (center-Portland State University MS Student), and Vanessa Swenton conducted early-June field work mapping in the eastern Harney Basin of Malheur County, SE Oregon. The Harney Basin is a focus area for DOGAMI-USGS STATEMAP-funded geologic mapping to better understand geologic hazards and resources.**



# Staff Report and Memorandum

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To: Chair, Vice-Chair, and members of the DOGAMI Governing Board

From: Ruarri Day-Stirrat, Director & State Geologist

Date: June 17, 2025

**Regarding: Agenda Item 12 – MLRR Process Audit Report**

Ruarri Day-Stirrat, Director & State Geologist, and Sarah Lewis, MLRR Program Manager, will review the MLRR Process Audit Report.

***Proposed Board Action: The Board may be asked to take an action on this item.***



FINAL REPORT

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# **Oregon Department of Geology and Mineral Industries**

## **PERMITTING PROCESS AUDIT**

April 9, 2025

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Moss Adams LLP  
999 Third Avenue, Suite 2800  
Seattle, WA 98104  
(206) 302-6500





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# I. EXECUTIVE SUMMARY

## A. INTRODUCTION

The Oregon Department of Geology and Mineral Industries (DOGAMI, the Agency) engaged Moss Adams LLP to evaluate the Mineral Land Regulation and Reclamation Program (the Program, MLRR) surface mine permitting processes. For this audit, we focused on evaluating these processes and MLRR’s communication practices for improvement in efficiency and consistency and assessing staff capacity to meet the Program’s key performance measures. This audit did not evaluate the MLRR drilling program and only focused on permitting processes.

As part of the assessment, we conducted planning, data collection, and analysis in order to gain an understanding of the existing environment, identify opportunities for improvement, and provide practical recommendations.

## B. SUMMARY OF OBSERVATIONS AND RECOMMENDATIONS

Observations and recommendations are grouped into four categories: 1) Application Process, 2) Operations, 3) Staffing, and 4) Customer Service. These observations and recommendations are summarized below; greater details and actionable recommendations are included in [Section IV](#) of this report.

OBSERVATIONS AND RECOMMENDATIONS		
Application Process		
1.	Observation	The process of obtaining a permit application through DOGAMI’s review process takes an average of a year to complete and the Agency currently has a backlog of approximately 100 applications in process.
	Recommendations	A. Expedite permit processing and clear its application backlog by increasing staff capacity, implementing e-Permitting, and integrating AI into the comprehensive review process. B. Establish performance measures that set goals for permit processing time by process type, implement tracking mechanisms, and report out on progress toward these goals on an annual basis.
2.	Observation	The comprehensive review process is labor intensive and takes a significant amount of time to complete, which delays application processing.
	Recommendations	A. Evaluate and document the comprehensive review process to ensure all steps are necessary for the review process while maintaining compliance with statutes and regulations. B. Explore using AI to assist in the comprehensive review process to streamline the process and restore staff capacity to work on other tasks.



OBSERVATIONS AND RECOMMENDATIONS		
3.	<b>Observation</b>	DOGAMI requires several peer review and approval processes before issuing final documents; these reviews can delay processing times by approximately six weeks and are not guided by documentation to ensure a consistent process.
	<b>Recommendations</b>	<ul style="list-style-type: none"><li>A. Develop set review standards that outline consistent expectations for peer reviews.</li><li>B. Consider implementing a tiered review process to expedite low-risk decisions and enable additional review processes for high-risk or high-impact decisions or actions.</li></ul>
4.	<b>Observation</b>	DOGAMI staff try to proactively address the requirements of other State agencies to better anticipate their needs and reduce additional work at the end of the permit application process; however, these efforts are not well-received by applicants.
	<b>Recommendations</b>	<ul style="list-style-type: none"><li>A. Clarify DOGAMI's regulatory authority to coordinate requirements or other State agencies and communicate anticipated requirements from other agencies in a separate considerations section of pre-application meeting notes or deficiency letters.</li><li>B. Encourage other agencies formally request extensions when needed and transparently communicate these requests to applicants to manage expectations and maintain clarity in the application timeline.</li></ul>
Operations		
5.	<b>Observation</b>	DOGAMI is currently facing a backlog of mine site inspections, and due to resource constraints, must make decisions about how to prioritize inspections.
	<b>Recommendation</b>	To enhance inspection capacity and ensure consistent standards across all sites, increase operation fees to fund additional staffing, standardize inspection procedures, and centralize oversight of inspection staff.
6.	<b>Observation</b>	The Program lacks a comprehensive, appropriately resourced compliance program, which creates risks of overdue compliance issues and environmental harm.
	<b>Recommendations</b>	<ul style="list-style-type: none"><li>A. Move forward with hiring an Operations and Policy Analyst as proposed in the staffing plan to expand compliance program resources.</li><li>B. Build a comprehensive internal framework that outlines specific procedures for the application of civil penalties.</li><li>C. Explore options for incorporating more legal expertise into DOGAMI's compliance processes.</li></ul>
7.	<b>Observation</b>	The Program lacks comprehensive standard operating procedures (SOPs) and guidance documents on key processes, which can result in errors, inconsistencies, and inefficiencies in the permitting process.
	<b>Recommendation</b>	Complete development of SOPs to enhance consistency, efficiency, compliance, and quality control, with a focus on developing an SOP for completing a comprehensive review, peer review, and compliance processes.



OBSERVATIONS AND RECOMMENDATIONS		
8.	<b>Observation</b>	The permitting application fee does not adequately cover the costs of services and staffing, which affects the quality of services the Program is able to provide.
	<b>Recommendations</b>	A. Increase the permit application fee to better reflect the cost of staff time and resources in reviewing materials. B. Establish a clear policy for annually updating fees based on the Consumer Price Index (CPI) to help mitigate financial impacts on the Program over time.
Staffing		
9.	<b>Observation</b>	Some staff reported high workloads and limited capacity, likely due to low staffing levels, reliance on sole contributors, and some process inefficiencies.
	<b>Recommendation</b>	Prioritize adding a Lead Aggregate Reclamationist Worker, three Reclamationists, four Field Inspectors, and a Business Supervisor to address Program operational gaps and expedite permitting processes.
10.	<b>Observation</b>	The Program Manager has a large span of control over a highly technical team, which can lead to burnout and bottlenecks and limit planning and strategy.
	<b>Recommendation</b>	A. Create a Lead Aggregate Reclamationist position to support the permitting process and provide additional technical support. B. Move forward with hiring the Business Supervisor as proposed in the staffing plan to alleviate the current manager's span of control.
11.	<b>Observation</b>	DOGAMI staff exhibit a high level of risk aversion in decision-making due to historical concerns about personal liability.
	<b>Recommendation</b>	Empower staff to make informed, risk-based decisions by providing reassurance to staff about the legal protections afforded to them under Oregon State law and developing decision guides.
Customer Service		
12.	<b>Observation</b>	Although the Program has set communication practices, communication to applicants regarding their deficiencies are sometimes sent one at a time rather than when a list is complete, which can result in conflicting notes being issued.
	<b>Recommendation</b>	Ensure that one dedicated staff member is consolidating deficiencies from various reviewers and reviewing alignment in comments before communicating this information as a complete list to applicants.



OBSERVATIONS AND RECOMMENDATIONS		
13.	Observation	DOGAMI's limited and primarily reactive education and outreach efforts are constrained by limited staff capacity, which may lead to difficulty processing application submissions and strained relationships with applicants, affecting the efficiency of the permitting process.
	Recommendation	<ul style="list-style-type: none"><li>A. DOGAMI should prioritize small-scale educational improvements that yield significant benefits, starting with ensuring that application forms on the website are consistent with internal standards, and that examples of application materials provided on the website are relevant.</li><li>B. In the long term, the Program will likely need to increase the number of staff hours dedicated to educational outreach.</li></ul>



# II. INTRODUCTION

## A. BACKGROUND AND SCOPE

DOGAMI is a State agency that helps increase understanding of Oregon’s geologic resources and hazards through science and stewardship. The MLRR Program is a regulatory program that works to minimize impacts of natural resource extraction and to optimize opportunities for reclamation. The fee-based Program issues permits and regulates surface mining and exploration, oil, gas and geothermal well drilling, and chemical process mining activities on lands within the state, and works collaboratively with other State agencies, local governments, Oregon’s federally recognized Indian tribes, industries, and the public.

DOGAMI engaged Moss Adams to conduct an audit of the Program’s surface mining and exploration permitting process. DOGAMI’s drilling program was not within the scope of this audit. Moss Adams evaluated the following objectives over the period of January 2019 through December 2024:

- Evaluate permitting processes to identify opportunities for improvement in timeliness, efficiency, consistency, and quality
- Assess internal and external communication practices
- Review staff capacity to achieve DOGAMI's key performance measures

We conducted this audit from February to April 2025.

## B. METHODOLOGY

PHASE		DESCRIPTION
1	<b>Project Initiation and Management</b>	This phase concentrated on comprehensive planning and project management, including identifying employees to interview and documents to review, communicating results, and providing regular updates on project status.
2	<b>Fact-Finding</b>	<p>This phase included interviews, document review, and an external stakeholder survey.</p> <ul style="list-style-type: none"><li>• <b>Interviews:</b> We conducted interviews with all Program staff, several DOGAMI leaders, as well as 10 external stakeholders involved in the permitting process. Overall, we spoke to 27 people. The purpose of these interviews was to gain insights into the current Program environment including strengths and opportunities for improvement related to the permitting process at DOGAMI</li><li>• <b>Document Review:</b> We reviewed a variety of documents, data, and information provided by the Program, including but not limited to organizational charts, process maps, permit application listings, permit files, fees, education materials, policies and procedures, and the proposed staffing plan.</li><li>• <b>Survey:</b> We conducted a survey of 168 permit applicants involved in the permitting process. Of the 168 stakeholders who were sent the survey, 46 responded, resulting in a 27% responses rate, which is average for an external stakeholder survey.</li></ul>



PHASE		DESCRIPTION
3	<b>Analysis</b>	Based on the information gained during our fact-finding phase, we conducted and consolidated research on relevant industry standards and best practices. We identified potential areas for improvement and developed practical recommendations.
4	<b>Reporting</b>	We communicated the results of our analysis with observations and recommendations, presented first in a draft report we reviewed with management to confirm the practicality and relevance of recommendations before finalizing the report.



### III. COMMENDATIONS

Although the focus of this audit was to identify areas that need improvement with DOGAMI's permitting process, it is important to note the areas of strength and existing good practices that can be leveraged for further improvement. The following is a list of commendations that the Moss Adams team would like to note:

- **Dedicated Staff:** The Program has experienced turnover in both leadership and staff positions, which has resulted in several process changes. Despite this, employees throughout the Program have stayed positive and committed to doing their best and serving the public. Staff generously offered their time, resources, and insights through interviews, documents, and surveys, creating a diverse and comprehensive pool of knowledge. Across both permittee interviews and survey results, DOGAMI staff were consistently praised for their responsiveness, professionalism, courtesy, and subject area expertise.
- **Supportive Management:** Management has cultivated a supportive and genuine environment for staff. Current management has overcome several obstacles, including tensions and significant turnover in previous leadership, in order to achieve these results.
- **Continuous Improvement:** DOGAMI staff and leadership emphasize continuous process improvements within the Program. In the midst of heavy workloads, staff seek opportunities to collaborate and improve their processes and are open to change. These improvements were noted by some external stakeholders who acknowledged that most improvements made to date are appreciated.
- **External Communication Improvements:** Staff have worked on improving external communication with applicants and permittees through monthly newsletters and opportunities to meet with reviewers through pre-application meetings.
- **System Enhancement Initiatives:** DOGAMI is working on implementing an e-Permitting system to enhance the application process and provide more transparency to applicants.
- **Updated Application Forms:** The Program updated permit application guidance forms in 2024 to provide more clarity on application requirements. Some interviewed stakeholders reported these updates are appreciated and provided improvement in the application submittal process.

We would like to commend DOGAMI staff, management, and permittees for their willingness to assist us in this assessment process. These commendations, coupled with our observations and recommendations, provide an overview of areas of strengths that can help improve Program operations.





## IV. OBSERVATIONS AND RECOMMENDATIONS

The following observations and recommendations are grouped into four categories: 1) Application Process, 2) Operations, 3) Staffing, and 4) Customer Service.

### A. APPLICATION PROCESS

#### Timeliness and Backlog

1.	Observation	The process of obtaining a permit application through DOGAMI's review process takes an average of a year to complete and the Agency currently has a backlog of approximately 100 applications in process.
	Recommendations	<p>A. Expedite permit processing and clear its application backlog by increasing staff capacity, implementing e-Permitting, and integrating AI into the comprehensive review process.</p> <p>B. Establish performance measures that set goals for permit processing time by process type, implement tracking mechanisms, and report out on progress toward these goals on an annual basis.</p>

#### OBSERVATION

The permit application process at DOGAMI is currently slow, delaying application processing, which has led to a backlog with nearly 100 applications in process as of March 2025. The Program uses a first-in, first-out approach in reviewing applications. The current permit application process includes the following steps:

1. Acknowledgment letter (by office staff) saying they received the application.
2. General review by office staff to flag any missing materials.
3. Review of application for completeness (required elements present; e.g., forms, plans, maps).
4. Review of application for technical information (e.g., plans, maps, and other required materials for technical sufficiency) and issue deficiency letter. This includes a comprehensive review and chronology process for transfer and amendment applications.
5. Subsequent reviews of revisions and additional materials.
6. Schedule a site inspection and follow-up inspection report.
7. Preparation of a draft permit and circulation to reviewing agencies.
8. Issuance of the permit once comments are resolved.

Based on our review of permitting processing data from the Program, between 2019 and 2024 it typically took, from the date an application was received to the date a permit was issued, on average 349 days for a new application, 444 days for a transfer, and 410 days for an amendment. Permitting timeliness has improved some over the years but continues to frustrate applicants. The table below shows the average number of days each application type took to complete the process over the past five years.



#### AVERAGE DAYS FROM RECEIPT TO PERMIT DECISION 2019-2024 (APPLICANT AND DOGAMI)

YEAR APP RECIEVED	NEW	TRANSFER	AMENDMENT
2019	402	148	162
2020	446	1085	606
2021	355	721	274
2022	366	555	899
2023	309	299	258
2024	144	No applications tracked	No applications tracked
Total Average	349	444	410

The Program currently tracks the time from receipt of an application to permit decision. While permit applications take an average of a year to complete, this reflects total time and does not distinguish if the application is waiting for action by DOGAMI, in active review, or with the applicant to respond to additional requests. Recently, the Program has begun to track when an application completes key steps in the process. Increasing the level of timeliness metrics by permit type and key steps could allow DOGAMI to better target improvement efforts. The planned e-Permitting system will be able track this more efficiently.

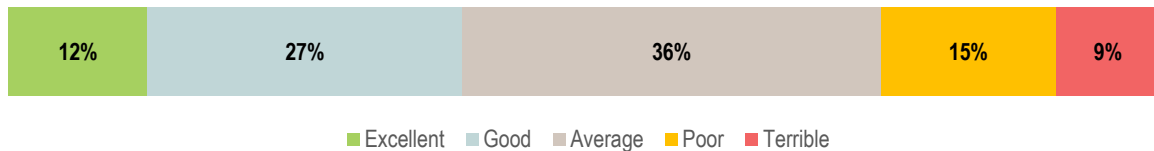
Most survey respondents (59%) reported that the timeliness of permit decision making in the Program is poor or terrible. Similarly, most respondents reported that the turnaround times for steps 3 through 8 outlined above were either somewhat delayed or very delayed (also see [Appendix A](#)).

This lengthy process is attributed to several factors, including bottlenecks in the review process and high staff workloads. The Program has considered different ways to streamline processes and improve the timeliness of the application process. One strategy the Program initiated in the last few years is to offer pre-application meetings as part of the application process. These meetings provide potential applicants an opportunity to meet with Program staff to discuss what the application process entails, including required documentation, and to discuss any potential roadblocks. Staff reported these meetings are helpful and have resulted in more sufficient documentation when applications are submitted; however, there is currently little data to verify whether these meetings are effective in reducing application delays.

Approximately 40% of survey respondents indicated that the quality and relevancy of pre-application meetings were excellent or good, while most others (36%) indicated that they were average. Several permittees interviewed reported these meetings may be helpful for newer applicants or certain permits that have special requirements but are not always effective for those that have gone through the permitting process several times and understand the general process. However, these meetings can be an opportunity to communicate recent changes to the process that all permittees should be aware of.



### How would you rate the quality and relevancy of pre-application meetings?



Other identified delays and bottlenecks in the application process are included in the table below:

#	APPLICATION PROCESS STEP	SURVEY RESULTS	DELAYS AND BOTTLENECKS
1	Acknowledgment letter (by office staff) saying they received the application was received.	Not included in survey	<ul style="list-style-type: none"><li>No delays or bottlenecks identified.</li></ul>
2	General review by office staff to flag any missing materials.	Not included in survey	<ul style="list-style-type: none"><li>Some are due to items missing from submissions and back-and-forth communication from office staff to ensure the application includes all required materials.</li></ul>
3	Review of application for completeness (required elements present; e.g., forms, plans, maps).	63% reported somewhat delayed or very delayed	<ul style="list-style-type: none"><li>Similar to step 2, some delays reports are due to incomplete items submitted and back-and-forth communication from staff to ensure the application includes complete information.</li></ul>
4	Review of application for technical information (e.g., plans, maps, and other required materials for technical sufficiency) and issue deficiency letter. This includes a comprehensive review and chronology process for transfer and amendment applications.	63% reported somewhat delayed or very delayed	<ul style="list-style-type: none"><li>This can also take a significant amount of time due to several factors including staff capacity, the sufficiency of documentation submitted, and mine site requirements.</li><li>Many interviewees reported that this step, which includes the comprehensive review, can cause delays and take a significant amount of time with DOGAMI (also see <a href="#">Comprehensive Review Process</a> section).</li><li>Program staff also reported some challenges in receiving sufficient documentation with permit applications. Some information, such as site maps, may not be applicable to a site or have incorrect boundaries. Additional documentation may be needed after reviewing the proposed operating and reclamation plans, such as certain surveys or maps depending on the site's geography. This requires back-and-forth between Program staff and applicants to obtain the necessary documents.</li><li>In addition, this step requires a subject matter expert (SME) to review information, which can take time as many SMEs are sole contributors and typically have many other responsibilities that limit their capacity to review permit</li></ul>



#	APPLICATION PROCESS STEP	SURVEY RESULTS	DELAYS AND BOTTLENECKS
			applications timely (also see <a href="#">Staff Workloads</a> section).
5	Subsequent reviews of revisions and additional materials.	52% reported somewhat delayed or very delayed	<ul style="list-style-type: none"><li>Similar to Step 4, this often requires back-and-forth communication due to the challenges discussed above.</li></ul>
6	Schedule a site inspection and follow-up inspection report.	48% reported somewhat delayed or very delayed	<ul style="list-style-type: none"><li>Program staff reported site inspections can be delayed due to limited staff capacity or unsafe weather such as snow and ice.</li></ul>
7	Preparation of a draft permit and circulation to reviewing agencies.	44% reported somewhat delayed or very delayed	<ul style="list-style-type: none"><li>DOGAMI must circulate permits to other agencies and provide 35 days for these agencies to respond with any feedback. These agencies may request an extension, which can further delay the process (also see <a href="#">Interagency Circulation</a> section).</li></ul>
8.	Issuance of the permit once comments are resolved.	52% reported somewhat delayed or very delayed	<ul style="list-style-type: none"><li>No bottlenecks identified.</li></ul>

This table refers to processing for operating permits, including new permits and amendments. In interviews, applicants specifically identified transfer permits as a major source of frustration. They mentioned that transfer permits had gone from an application process taking between two weeks or months to a process that could now take over a year. This is because transfers as a permitting action now trigger a comprehensive review. Comprehensive reviews are discussed more below, in the [Comprehensive Review Process](#) section. In the data provided by Program staff, transfers took the longest out of all application types. While sites may be out of compliance for other reasons, the act of transferring ownership should not pose new environmental risks.

In addition to these process bottlenecks identified, the Program staff lacks the capacity to quickly review applications in the queue and respond to applicants' questions about applications in review. This has led to a backlog of applications and impacts customer satisfaction.

### RECOMMENDATION

The Program should continue to evaluate the permitting application process by reviewing each step involved. This should include evaluating of the following considerations for streamlining this process and reducing delays and bottlenecks:

#	APPLICATION PROCESS STEP	DELAYS AND BOTTLENECK CONSIDERATIONS
1	Acknowledgment letter (by office staff) saying they received the application.	<ul style="list-style-type: none"><li>No delays or bottlenecks identified.</li></ul>
2	General review by office staff to flag any missing materials.	<ul style="list-style-type: none"><li>E-Permitting will likely result in quicker general reviews. Staff anticipate the system may be able to</li></ul>



#	APPLICATION PROCESS STEP	DELAYS AND BOTTLENECK CONSIDERATIONS
		automatically complete this general review of materials or prevent applications from being submitted if certain documents are missing. This will speed up this step and potentially lead to less back-and-forth communication at this stage of the process.
3	Review of application for completeness (required elements present; e.g., forms, plans, maps).	<ul style="list-style-type: none"><li>Improved permittee guidance documentation and outreach efforts will likely support permittees' understanding of required items and reduce the back and forth required at this step (see <a href="#">Education and Outreach</a> section).</li></ul>
4	Review of application for technical information (e.g., plans, maps, and other required materials for technical sufficiency) and issue deficiency letter. This includes a comprehensive review and chronology process for transfer and amendment applications.	<ul style="list-style-type: none"><li>Implementation of the staffing plan will likely lead to faster reviews if more staff, particularly SMEs, are available to review permits (see <a href="#">Staffing</a>).</li><li>In addition, creating guidance to clarify Program terminology and empowering staff decision-making may lead to faster turnaround time for both review of technical information and subsequent revisions (see <a href="#">Standard Operating Procedures</a> section).</li><li>This step may also be improved with the use of Artificial Intelligence (AI) and additional staff to support the comprehensive review process (also see <a href="#">Comprehensive Review Process</a>).</li></ul>
5	Subsequent reviews of revisions and additional materials.	<ul style="list-style-type: none"><li>Similar to step 4, additional staff will support review revisions. The Program may also consider reducing the frequency and level of internal peer review required (see <a href="#">Internal Peer Review Standard</a>).</li><li>In addition, staff anticipate the e-Permitting system will provide all correspondence in one centralized location to minimize email and confusion from back-and-forth communication.</li></ul>
6	Schedule a site inspection and follow-up inspection report.	<ul style="list-style-type: none"><li>Additional staff capacity will likely reduce bottlenecks for this step.</li></ul>
7	Preparation of a draft permit and circulation to reviewing agencies.	<ul style="list-style-type: none"><li><a href="#">See Interagency Circulation</a>.</li></ul>
8	Issuance of the permit once comments are resolved.	<ul style="list-style-type: none"><li>No bottlenecks identified.</li></ul>

In addition to these considerations, the Program should continue evaluating the pre-application process to assess if these meetings result in more complete applications that in turn reduce the application process.

The Program should also consider improving the transfer process by either deferring comprehensive reviews or by conducting high-level comprehensive reviews that do not take as long as standard comprehensive reviews. Transfers are typically a quick process and are expected to be more administrative than regulatory. Reducing the requirements for this process will improve the timeliness, reduce staff time on these applications, and support permittees. Issuing a transfer allows mine



owners to operate without significant delays and pursuant financial stress, but does not preclude the Program from conducting any continuing regulatory activity.

Finally, DOGAMI should establish and measure more detailed timeliness performance measures by permit type (e.g., exploration, transfer, amendment, operating). These metrics could assess smaller steps within the application review process, determining the time that applications spend with staff before they are handed off internally or handed back to the applicant. More detailed timeliness metrics could also assess timeliness on the applicant side, such as measuring the time of an initial application until the submittal is actually complete, or the time that elapses between when a customer receives comments from first review until second review materials are submitted to DOGAMI. Performance goals should be set annually and measurements should be conducted and reported on a quarterly basis.

More detailed performance measures can help DOGAMI to more precisely identify which aspects of the review process are most in need of improvement. With existing general timeliness measures, DOGAMI can determine whether the overall process is performing within speed expectations and target ongoing process improvements.

## Comprehensive Review Process

2.	Observation	The comprehensive review process is labor intensive and takes a significant amount of time to complete, which delays application processing.
	Recommendations	<ul style="list-style-type: none"><li>A. Evaluate and document the comprehensive review process to ensure all steps are necessary for the review process while maintaining compliance with statutes and regulations.</li><li>B. Explore using AI to assist in the comprehensive review process to streamline the process and restore staff capacity to work on other tasks.</li></ul>

### OBSERVATION

The comprehensive review process at the Program aims to ensure staff have a thorough understanding of mine sites before technical reviews, but this process is reportedly time-consuming. Staff indicated that the comprehensive review process for one file can often take days to weeks to complete alongside other tasks and presents a bottleneck in the permit review process.

The Program initiated the comprehensive review process approximately 10 years ago to review all information related to a permit before it is issued, transferred, or amended. In the past, staff reported issues in not knowing key historical information about a permit or site during the permit review that was pertinent to the current review. The goal of the comprehensive review is to create a clear narrative of each site's history, enabling reviewers to make informed decisions based on available historical data. This process helps ensure staff have a general understanding of mine sites before the technical review process. The comprehensive review process includes a detailed examination of all historical permit documentation for a site, to identify key permit conditions and ensure all relevant information is documented.

A significant portion of the comprehensive review process involves understanding the approved plans, maps, and permit conditions for each site, which can be complicated by multiple amended



operating plans under different regulatory requirements. This is important as mine permits in Oregon are “life of mine,” which means that permits follow statutes that were in place at the time the permit was issued. Staff reported these comprehensive reviews take several days or even weeks to complete depending on the nature of the historical files, permit requirements, and staff capacity. Despite the time-consuming nature of the reviews, they are crucial for maintaining permit integrity and preventing adverse environmental impacts at mine sites.

Staff also reported that currently, only about a third of permitted sites have undergone a comprehensive review. The manual nature of the work and the inconsistent quality of historical materials complicates and slows down the process. While staff have developed broad guidance for this process, its highly technical nature and the nuances that depend on site history creates complexities, further contributing to a backlog of applications. Mine sites may require specialized expertise (e.g., floodplain, groundwater expertise) to understand the site and required permit documentation to ensure the site is following applicable State regulations.

Stakeholders perceive the comprehensive review process has evolved to prioritize compliance with current standards and to anticipate potential legal issues, resulting in significant delays and challenges in getting an application through the process. Stakeholders also reported they are required to rectify any compliance issues found in the comprehensive review process before proceeding, which has become a major bottleneck as some issues require additional studies or permits that can take months to obtain. On the other hand, DOGAMI staff reported prior errors are sometimes found during a comprehensive review such as an area that doesn’t have a boundary map, or is not included within the boundary map but is an area of active mining. The Program has taken the approach to address these findings before a permit is amended or transferred to get the site in compliance and avoid any future adverse impacts.

Staff also reported that comprehensive reviews tend to be the biggest bottleneck in the application review process on DOGAMI’s side. This can cause slower application reviews (also see [Timeliness and Backlog](#)) and contribute to the backlog of applications. It can also result in financial costs to applicants and economic costs to parties that have a demand for mined materials. If applicants choose to mine without a permit due to delays, they risk significant environmental harm to the state.

## RECOMMENDATIONS

### *Evaluate the Comprehensive Review Process*

DOGAMI should evaluate and document each step of the comprehensive review process and determine which documents are most important to capture in a review before a permit issuance decision is made. This documentation will help create consistency in the process and reduce rework due to personal preferences of individual personnel. DOGAMI currently has a draft of this documentation, although the policy is still undergoing adjustments.

DOGAMI should consider implementing special conditions for transfer permits that allow applicants to continue through the process and potentially have a permit issued contingent on addressing lower-risk issues. For example, all compliance issues with a direct impact to the safety or health of the community should be addressed before permit applications are issued. This process will require a rigorous decision-making exercise to agree upon and understand which compliance issues should be prioritized.





Because DOGAMI has the power to bring an outreach, inspection, or compliance action at any time, it may not be beneficial to delay the permit process until each action is resolved. This process, though in place at the Program, should be communicated to all staff to ensure the process is consistently followed. This will help move permit applications forward, particularly for transfers, while setting barriers to ensure DOGAMI keeps the state safe and minimizes risks to all involved parties.

### *Consider the Use of AI*

DOGAMI should explore the implementation of an AI system to improve the efficiency and accuracy of comprehensive reviews. By automating key processes such as chronology tracking, document processing, compliance reviews, and data analysis, AI has the potential to significantly reduce the time staff spent on these tasks. Key features of the AI system should include:

- **Document Conversion and Searchability:** AI can use advance optical character recognition (OCR) technology to convert scanned documents into searchable text. This feature would allow staff to quickly locate specific information within permit files, streamlining the review process.
- **Information Summarization:** AI programs can summarize the essential details of each permit file, providing staff with concise overviews that highlight specific information without requiring them to sift through extension documentation to understand what is most important. Staff will still need to review the information to ensure the summaries developed are complete and accurate; however, this can be significantly less time consuming.
- **Cross-Referencing Capabilities:** AI can cross-reference relevant statutes and related permit or environmental information to help create a comprehensive summary. This capability ensures that all pertinent regulations and historical data are considered during the review process.
- **Flagging Inconsistencies:** AI systems can automatically flag inconsistencies, missing documents, or incomplete information within permit files. By identifying these issues early, the AI helps staff focus their attention on key areas that require further investigation before approving a permit.

To maintain the confidentiality and security of permit information, DOGAMI will need its own dedicated AI instance. Consulting and technology firms may develop this type of technology and service for DOGAMI. This investment in technology will not only help streamline the comprehensive review process but also empower staff to focus on more strategic tasks.





## Internal Peer Review Standard

3.	Observation	DOGAMI requires several peer review and approval processes before issuing final documents; these reviews can delay processing times by approximately six weeks and are not guided by documentation to ensure a consistent process.
	Recommendations	<p>A. Develop set review standards that outline consistent expectations for peer reviews.</p> <p>B. Consider implementing a tiered review process to expedite low-risk decisions and enable additional review processes for high-risk or high-impact decisions or actions.</p>

### OBSERVATIONS

The internal peer review processes within the Program are designed to ensure that inspection reports, comprehensive reviews, and draft permits undergo comprehensive technical reviews. However, these processes can be drawn out, often requiring multiple approvals and collaborative discussions that extend total processing times by approximately six weeks. This timeline includes several weeks for technical reviews, additional time for implementing changes based on those reviews, and further weeks for administrative review before materials are finalized for distribution.

One of the significant challenges faced during these reviews is the inconsistency in how standards are enforced. Expectations can vary based on the reviewers' professional backgrounds, experiences, and personal preferences. Applicant survey results and interviews revealed discrepancies between the materials required during the application process and the deficiencies identified during the review. This lack of uniformity can lead to confusion and frustration for both staff and applicants.

Long review times and review inconsistency may be caused by the following three factors:

- **Rigorous review standard:** Program staff may have an infeasibly rigorous standard for peer review, in what is an inherently challenging, detail-oriented, and at times ambiguous process. The comprehensive nature of the application information allows for a prolonged review cycle even without peer reviews.
- **Unstandardized criteria:** DOGAMI does not yet have standardized review criteria, allowing personal preferences to potentially prolong the peer review process.
- **Information inconsistency:** Inconsistency of information required from applicants may extend the review process, as different DOGAMI staff may communicate inconsistent information requirements to applicants.

Inconsistencies in information requests and reviews contributes to extended processing times. These extended review processes risk operational inefficiencies and contribute to delayed application reviews (also see [Timeliness and Backlog](#)).

To address these issues, DOGAMI staff are working to standardize the review process by developing Standard Operating Procedures (SOPs). These SOPs aim to provide clear guidelines for key tasks, such as comprehensive reviews, application reviews, and peer reviews. By establishing these guidelines, DOGAMI intends to promote a more consistent review process. Best practices suggest that regulatory organizations should adhere to consistent and predefined standards to minimize subjective interpretation and personal bias, thereby reducing discrepancies. The review process



should ideally strike a balance between thoroughness and timeliness to prevent unnecessary delays, such as those associated with extensive peer review processes.

## RECOMMENDATIONS

To address the challenges posed by the high standards of peer review and inconsistency in the review process, DOGAMI should implement the following recommendations:

- **Clear Application Requirements:** Ensure that the requirements listed on the DOGAMI website accurately match the standards applied during the review process. DOGAMI should also work to ensure that applicants understand what is meant by each requirement to avoid misunderstandings in what documentation is requested (also see [Education and Outreach](#)). This alignment will set clear expectations for applicants and streamline the review process by reducing discrepancies between expected and submitted materials, and reduce back-and-forth communication between DOGAMI and applicants.
- **Set Review Standards:** Establish a uniform standard for reviews that all staff must adhere to. This internal standard should be clearly documented and accessible, providing a consistent framework that guides the review process and minimizes variability in expectations. DOGAMI could implement a tiered review system where less critical items undergo a lighter review process, while high-risk items continue to receive additional reviews. To implement this, DOGAMI could establish specific criteria for what constitutes a high-risk decision that requires more than one peer review to help differentiate between routine and high-stakes reviews, allowing for a more streamlined process for lower risk items. Regular training sessions should be conducted to familiarize all staff involved in reviews with these standards to ensure uniform application across all reviews.
- **Peer Review Endpoint:** Implement a definitive end point for peer reviews. This point will define a clear endpoint for the review process, beyond which no further review iterations are allowed unless significant compliance issues are identified. This measure will help manage the review duration and prevent the process from becoming overly extended.

If DOGAMI is able to secure a Lead Worker position, this role could take on the final review process and only require Reclamationists to complete small portions of peer reviews based on their specialized expertise. This can also help reduce variability in processes and expectations while streamlining the review process.



# Interagency Circulation

4.	Observation	DOGAMI staff try to proactively address the requirements of other State agencies to better anticipate their needs and reduce additional work at the end of the permit application process; however, these efforts are not well-received by applicants.
	Recommendations	<p>A. Clarify DOGAMI's regulatory authority to coordinate requirements or other State agencies and communicate anticipated requirements from other agencies in a separate considerations section of pre-application meeting notes or deficiency letters.</p> <p>B. Encourage other agencies formally request extensions when needed and transparently communicate these requests to applicants to manage expectations and maintain clarity in the application timeline.</p>

## OBSERVATION

During the interagency circulation process, DOGAMI provides application materials and a Note to Reviewing Agencies or Draft Permit to other State agencies and Tribal governments for review and comment. These agencies are provided a 35-day window to provide their comments, although they may request extensions. It is not uncommon for external agencies to require modifications to the proposed mining plan during this review which may result in additional information needs, permit conditions, additional permits and/or approvals, and/or survey work. These additional requests must be fully addressed before DOGAMI can issue the applicant a permit.

DOGAMI staff actively work to anticipate and address the needs of external agencies based on their past experience. The primary motivation behind DOGAMI's proactive approach is to preemptively address potential issues that might necessitate later modifications to permit conditions, as required by the review standards of other agencies. By anticipating these needs, DOGAMI hopes to reduce how often applicants must revise their submissions, thereby streamlining the process.

However, many applicants perceive that DOGAMI sometimes extends beyond its regulatory scope by anticipating the requirements of external agencies and requiring additional information from applicants to move their application forward. This perception stems from DOGAMI's obligation to communicate the standards set by other government agencies and to help prevent significant delays at the end of the permit process. However, given DOGAMI's limited resources, this proactive work can compete with other priority tasks, adding to the workload of staff and causing frustration with applicants.

Additionally, some external State agencies such as the State Historic Preservation Office (SHPO) and Oregon Department of State Lands (DSL), amongst others, often cannot review and provide comments within the designated 35-day window. This delay raises concerns about the subsequent steps in the application process, particularly when timely feedback is not provided. While some preemptive work may be beneficial for streamlining the permit process, it also introduces risks to both the application process and relationships with applicants.

- **Risks to the Application Process:** One risk is disseminating information that may not be entirely accurate or relevant, given DOGAMI's lack of specialization in the domains of other agencies. This can lead to confusion and potentially inefficient application preparations, affecting the overall speed and reliability of the permitting process. It may also cause frustration for applicants if concerns raised by DOGAMI staff in pre-application meetings do not match feedback from



external agencies during interagency circulation. Applicants expressed these experiences in interviews and survey results and noted that they felt DOGAMI was overstepping its regulatory ability to compensate for other overburdened agencies.

- **Risks to Relationships with the Permitted Community:** A common theme was the feeling that DOGAMI was purposefully delaying applications to accommodate other agencies' timelines in contradiction to the legal time limit. This behavior comes across as obstructionist to permit applications and created tension between applicants and DOGAMI. This tension arises due to uncertainty about whether DOGAMI postpones applications to allow other agencies time to respond, or if they adhere to the legal process following requests for an extension from those external agencies.

## RECOMMENDATIONS

To address perceptions among applicants that DOGAMI occasionally exceeds the scope of its mandate, the Agency should better communicate where DOGAMI-specific requirements are backed by regulatory authority. Clearly communicating its role will provide stakeholders such as applicants, how DOGAMI remains within the intended scope.

DOGAMI can continue to advise applicants on requests that they should anticipate from external agencies. Staff should categorize issues that may arise during the interagency circulation process into a "separate consideration" section of pre-application meetings or deficiency letter. Presenting information in this less definitive, more optional format may help DOGAMI refrain from positioning itself as the authoritative body on matters that fall under the purview of other agencies. This may help clarify roles and responsibilities, reducing confusion among applicants about where to seek specific guidance.

Finally, DOGAMI should encourage other agencies involved in the review process to formally request extensions when necessary. Importantly, DOGAMI should ensure that extension requests are communicated clearly to applicants, explaining that these requests came from external agencies. This transparency will help manage applicant expectations and provide a clear timeline, thereby supporting trust and understanding throughout the application process.

## B. OPERATIONS

### Inspections

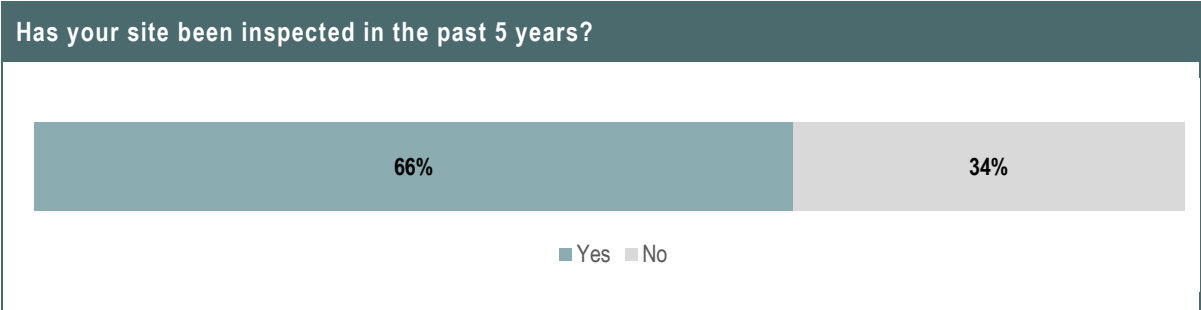
5.	Observation	DOGAMI is currently facing a backlog of mining site inspections, and due to resource constraints, must make decisions about how to prioritize inspections.
	Recommendation	To enhance inspection capacity and ensure consistent standards across all sites, increase operation fees to fund additional staffing, standardize inspection procedures, and centralize oversight of inspection staff.

#### OBSERVATION

DOGAMI is currently facing a backlog of mining site inspections due to resource constraints. As such, the Agency is prioritizing inspections based on permitting actions, compliance issues, complaints, or specific requests from permit holders. In the permittee survey, one-third of permittees indicated that their site had not been inspected in the last five years. Since the survey focused on permittees with



pending actions, this suggests that the backlog of inspections across all active mine sites is significant.



According to DOGAMI’s Key Performance Measure (KPM), the Agency aims to proactively inspect surface mining sites to prevent off-site impacts or violations and foster positive relations with operators. The KPM for active mine site inspections is publicly available and sets the following clear targets for annual inspections:

KPM INFORMATION	
KPI Title:	Active Mine Sites Inspected
What’s Achieved:	Proactive inspection of surface mining sites to help prevent off-site impacts or violations, and build positive relations with operators
How Progress is Measured:	Percentage of active mine sites inspected annually
2024 Target vs. Actual:	Target: 20% Actual: 14%

While DOGAMI aims to inspect mine sites every 5 years, the State of Washington reports that it conducts inspections of known mines every one to two years.<sup>1</sup> The primary reasons reported in interviews for the backlog and inability to meet inspection goals include understaffing, the challenge of covering extensive geographic areas, and seasonal/weather limitations. The workload associated with inspecting every site annually or biannually would be substantial and contribute to the backlog.

Additionally, the funding intended to support inspections, derived from renewal fees, has been subsidizing the cost of application reviews. To support inspection costs, DOGAMI has the authority to charge up to \$2,000 for special inspections. However, staff reported this option is currently not utilized, in part due to sites not receiving routine inspections that would identify issues that may compound into requiring a special inspection.

This approach has led to application processing being delayed due to pending inspections. This particularly affects areas on the east side of the Cascade Range that require adequate conditions to

<sup>1</sup> <https://www.dnr.wa.gov/programs-and-services/geology/energy-mining-and-minerals/surface-mining-and-reclamation#how-is-compliance-with-the-surface-mining-act-maintained?>



inspect mine sites safely and effectively, as snow and ice can prohibit teams from safely traveling and obstruct views of mine sites.

The lack of routine inspections leads to complaints, an increased need for compliance actions, and additional file maintenance efforts, particularly at sites that have not been reviewed in over a decade. This not only strains DOGAMI's resources further but also risks significant environmental impacts and potential violations that could have been addressed at a lower level through regular inspections.

**RECOMMENDATION**

DOGAMI should continue with the proposed increased fees associated with mining operations to adequately fund the necessary staffing expansion (also see [Permit Application Fee](#)). This increase in funds will enable DOGAMI to provide additional inspectors and expand its geographic coverage for inspections to ensure more consistent oversight across all sites. The Program should move forward with the staffing plan to hire two additional inspectors (also see [Staff Workloads](#)).

Before hiring new inspectors, DOGAMI should develop and implement standardized inspection procedures, coordination practices, and reporting protocols. This will ensure that all inspectors, regardless of geographic location, follow these methods to maintain consistency across all operations. After these resources are developed, the Program should provide new inspectors with comprehensive training during the onboarding process to ensure they meet DOGAMI's standards. Development of these procedures may be assigned to the Operations and Policy Analyst position recommended in the staffing plan or temporary staff who can draft standardized procedures (see [Staff Workloads](#)).

Additionally, DOGAMI may wish to assign a lead to be responsible for a central oversight role or coordination (i.e., NRS4 position) and to oversee all inspection activities, ensuring that uniform standards are applied and facilitating effective communication and coordination among inspectors. This lead may be a current NRS4 position or a new NRS4 position in the future.

**Compliance Program**

6.	Observation	The Program lacks a comprehensive, appropriately resourced compliance program, which creates risks of overdue compliance issues and environmental harm.
	Recommendations	<div>A. Move forward with hiring an Operations and Policy Analyst as proposed in the staffing plan to expand compliance program resources.</div> <div>B. Build a comprehensive internal framework that outlines specific procedures for the application of civil penalties.</div> <div>C. Explore options for incorporating more legal expertise into DOGAMI's compliance processes.</div>

**OBSERVATION**

The Program has several available compliance and enforcement tools, including the following:

- Refuse to Issue a Permit



- Refuse Renewal, Termination, Revocation
- Unilateral Permit Modification
- Notice of Violation, Compliance Order
- Reclamation Security Demand
- Liens
- Notice of Civil Penalty

A compliance program is an important element of regulatory agencies. In the case of the Program, staff and applicants spend significant time ensuring that permit conditions are appropriately crafted to reduce environmental harm. However, without a robust compliance program, these conditions may be violated and undermine permit review and negotiation efforts.

Historically, the Agency has seldom utilized the full extent of its legal enforcement powers, preferring initial outreach and education efforts such as requests or warnings before escalating to shutdowns or other notices. For example, DOGAMI has only recently begun to engage in issuing civil penalties as compliance activities. Many sites likely remain out of compliance due to a lack of regular inspections (also see [Inspections](#)) and other compliance activities. This may be evidenced through complaints; DOGAMI receives about 30 complaints per year. In interviews, DOGAMI staff estimated that between 2019 and 2024, there were approximately 641 violations and 120 complaints. Although more than half of these violations were for nonpayment of renewal fees, many violations are causing environmental harm.

Education about enforcement efforts may be more effective for some forms of non-compliance than others. For example, late renewal violations have decreased following proactive communication through ENGAGe newsletter announcements in 2019, as well as the subsequent assessment of penalty fees. Therefore, delayed renewal may be addressed through compliance education.

DOGAMI has established the guidelines shown in the following table for imposing civil penalties on violations related to mining operations, as authorized by Oregon Revised Statue (ORS) 517.992.

**SUMMARY OF CURRENT AUTHORITY UNDER ORS 517.992**

SECTION	KEY DETAILS
Circumstances	<p>ORS 517.992 grants DOGAMI the authority to impose a civil penalty of not more than \$10,000 per day for violations of State law permit conditions when one of the following circumstances applies:</p> <ul style="list-style-type: none"><li>• A landowner or operator fails to complete erosion stabilization as required.</li><li>• The operator has failed to comply with an order for the suspension of surface mining operation operating without a required permit; or has failed to comply with an operating permit or reclamation plan.</li><li>• The operation is being conducted in violation of groundwater conditions imposed on an operating permit or reclamation plan.</li><li>• The operation is being conducted: without a permit; outside the permit boundary; or outside a permit condition regarding boundaries, setbacks, buffers, or the placement of surface mining refuse.</li></ul>





SECTION	KEY DETAILS
Authority	The Governing Board may impose civil penalties as authorized by ORS 517.992.
Warning Requirement	Written warning will be provided at least 48 hours before imposing a penalty unless there is immediate danger. This ORS references relevant statutes/rules and a statement of charges.
Payment Due	Penalty is due 10 days after the order becomes final by law or on appeal.
Notice and Hearing	Notice is served as per ORS 183.415. Recipients have 20 days to request a hearing. If no hearing is requested, the penalty becomes final.

These guidelines include a structured penalty schedule based on the severity of the threat to human health, safety, or the environment, and outline procedures for warnings, payments, and hearings to ensure due process.

#### PENALTY MATRIX UNDER ORS 517.992

CLASS	DEFINITION	REDUCED	MEDIAN	MAXIMUM
Class 1	Does not pose a potential threat to human health and safety or the environment	\$250	\$500	\$1,000
Class 2	Poses a potential, not immediate, threat to either human health and safety or the environment	\$750	\$1,500	\$3,000
Class 3	Poses an immediate but remediable threat to the environment	\$1,500	\$3,000	\$6,000
Class 4	Poses an immediate threat to human health or safety, causes actual human injury, poses a threat to the environment that is immediate and not remediable, or causes actual damage to the environment	\$3,000	\$5,000	\$10,000

While DOGAMI possesses the authority to enforce compliance through penalties, it is constrained by limited funding, staffing, and legal support. Currently, the compliance program is managed by a single full-time employee who also handles other duties. State regulatory agencies should have adequate resources and experienced personnel dedicated to compliance, enabling them to effectively promote compliance proactively and utilize their enforcement powers when appropriate. Significant time and effort is spent on creating appropriate permit conditions to ensure environmental safety; the compliance program should be resourced to ensure that those conditions are met on an ongoing basis.

The current approach to compliance creates risks for DOGAMI, industry stakeholders, and the people of Oregon. Lack of proactive compliance and appropriate enforcement poses challenges in holding permittees accountable, which in turn places additional burdens on staff who must overcompensate through outreach and education efforts. It may also potentially lead to discontent among permittees,





raising concerns about equity and fairness as enforcement is seen as inconsistent and selective. Insufficient compliance resources may also undermine the Agency's authority and effectiveness in ensuring adherence to regulations, ultimately impacting environmental and public safety standards.

## RECOMMENDATIONS

DOGAMI should move forward with hiring an Operations and Policy Analyst as proposed in the staffing plan. This role will be tasked with overseeing the legal aspects of compliance activities and ensuring they align with both internal standards and statutory requirements. This addition aims to dedicate more staff time to compliance activities, thereby strengthening DOGAMI's ability to monitor and enforce mining regulations effectively.

As noted in the staffing plan, this role may also be responsible for interagency (State and Federal) coordination, policy review to align statutory programs, coordination with the Department of Justice, and perform outreach and advise leadership. By enhancing focus on compliance, DOGAMI can improve adherence to regulations, reduce instances of non-compliance, and streamline the enforcement process.

DOGAMI should also build a comprehensive internal framework that outlines specific procedures for the application of civil penalties. This framework should include clear guidelines that align with extant information on how to prioritize compliance issues based on the class definitions provided in the ORS 517.992, as well as the Program Violation Class Decision Tree, and in the Continuum of Mining Without a Permit (MWOP). The framework will provide a standardized approach to enforcement, ensuring that compliance issues are addressed in a consistent, fair, and legally sound manner. With a structured approach to civil penalties, DOGAMI will be better equipped to handle violations effectively, prioritizing actions that pose the greatest risks to public health, safety, and the environment.

This documentation can also provide transparency to permittees as to the civil penalty process. By clearly outlining these procedures, the Program can ensure that permittees are fully informed of their responsibilities and the potential consequences of non-compliance, which can foster trust among stakeholders.

Finally, DOGAMI should explore options for incorporating more legal expertise into their compliance processes. This might involve hiring an on-call attorney or making more use of available legal resources at the Oregon Department of Justice. Enhanced legal support will ensure that compliance and enforcement actions are grounded in a solid legal basis and are defensible in case of disputes or legal challenges. By strengthening its legal capabilities, DOGAMI will improve its enforcement effectiveness and reduce the risk of legal complications, thereby enhancing its overall regulatory performance.



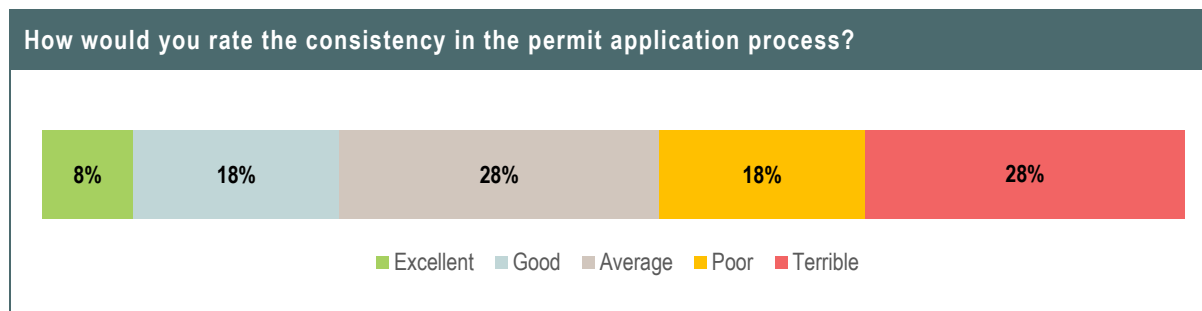
## Standard Operating Procedures

7.	<b>Observation</b>	The Program lacks comprehensive standard operating procedures (SOPs) and guidance documents on key processes, which can result in errors, inconsistencies, and inefficiencies in the permitting process.
	<b>Recommendation</b>	Complete development of SOPs to enhance consistency, efficiency, compliance, and quality control, with a focus on developing an SOP for completing a comprehensive review, peer review, and compliance processes.

### OBSERVATION

The Program currently lacks several finalized SOPs and guidance documents as many processes were not documented prior to 2019 or are not comprehensive and complete. SOPs are a step-by-step set of instructions on how to complete a task or activity that guides team members in performing tasks in a consistent manner. The Program has some SOPs and desk manuals, but they are not comprehensive and do not cover some key processes. This is largely due to the high volume of changes in recent years including new personnel, process updates, and low staff capacity, which make it difficult to comprehensively document all processes. As a result, staff reported they heavily rely on historical practices and there are often inconsistencies in processes due to gaps in documented guidance.

Permittees reported inconsistencies in Program practices in surveys and interviews, which also indicates the need for consistent guidance.



Staff reported they have started drafting some guidance documents such as a guide for the comprehensive review process but have not finalized or completed many SOPs because they lack the capacity to document and review processes (also see [Staff Workloads](#)). Some staff also reported that finalizing SOPs can be difficult due to different staff styles and preferences.

Comprehensive SOPs are particularly important given that some staff are new in their roles and the Program anticipates hiring new staff in the future. Without clear SOPs, staff are more likely to approach reviews and processes inconsistently, which was a concern noted by several permittees. There may also be a lack of transparency and accountability regarding certain processes such as completing a comprehensive review, reviewing applications, reviewing peer work, and compliance program functions.

Overall, a lack of SOPs increases the risk of error, which can impact efficiency; create rework, waste, or delays; and impact the Program's level of customer service. In the absence of SOPs, expectations can be unclear and application reviews may not be consistent.



## RECOMMENDATION

The Program should continue its work to develop SOPs to enhance consistency, efficiency, compliance, and quality control, while also supporting training, stakeholder communication, risk management, and continuous improvement.

To develop Program SOPs, staff should consider the following steps:

1. Develop a comprehensive framework that outlines the structure and content of the desired SOPs to make sure all areas are covered.
2. Conduct a gap analysis to identify where SOPs are incomplete or missing.
3. Prioritize SOP needs based on those that will have the most impact and reduce the most risk.
4. Assign responsibility for developing SOPs.
5. Develop new SOPs based on the framework, gap analysis, and prioritization efforts.
6. SOPs should be clear and concise. SOPs may include the following elements to enhance the readability and effectiveness of the document:
  - a. Detailed checklists
  - b. Process flowcharts
  - c. Diagrams
  - d. Forms, including information on how to fill them out
  - e. Definitions
  - f. Roles and responsibilities

The Program should prioritize completing the SOP for a comprehensive review as these tasks take a significant amount of time, and help reviewers understand mine sites for application review. As this will take substantial staff capacity to complete, the Program should assign this work to the Lead Aggregate Worker (NRS4) who can draft policies and procedures internally for the Program. The Program may also consider hiring temporary support to draft policies, procedures, and manuals in a short timeframe to build up the repository of guidance documents for the Program to revise over time. The Operations and Policy Analyst can also support efforts in overseeing and tracking documented policies.

Additionally, this SOP will be useful if the Program decides to use AI to support the comprehensive review process as the AI tool will need specific guidance on what and how to review information in the chronology. Other processes that should be prioritized include review processes and compliance program functions, as noted previously.

SOPs should be reviewed and updated regularly to align with current processes, e-Permitting, and any changes to statutory requirements and regulations. Due to the level of detail in SOPs, they may need to be updated more frequently, including when process changes occur. After SOPs are documented, they should be communicated to all staff and easily accessible for all staff to reference as needed. In addition, the Program should inform external stakeholders when changes to the process are made through SOPs.



## Permit Application Fee

8.	Observation	The permitting application fee does not adequately cover the costs of services and staffing, which affects the quality of services the Program is able to provide.
	Recommendations	<ul style="list-style-type: none"><li>A. Increase the permit application fee to better reflect the cost of staff time and resources in reviewing materials.</li><li>B. Establish a clear policy for annually updating fees based on the Consumer Price Index (CPI) to help mitigate financial impacts on the Program over time.</li></ul>

### OBSERVATION

The Program's current fees have not been updated in several years and the current permit application fee is insufficient to cover the costs of services and staff hours. The Program has kept the application fee low to allow sufficient access for applicants of all sizes in the industry; however, this is not sustainable. The current application fee is \$2,000, which was last updated at the beginning of 2021 and is proposed to increase to \$6,500, a 225% increase. Amongst both Program staff and permittees, there is widespread understanding and acknowledgement that the current application fee is not adequate to cover the costs of staff and related expenses. As a result, renewal fees are relied upon for application review processes and insufficient revenue remains to provide regular inspections as intended through the renewal fees.

The Program evaluated several scenarios in increasing its fees, evaluating all estimated costs of the Program to ensure it has sufficient revenue to provide necessary services plus scenarios in adding certain positions. This fee increase, at a minimum, must support the current rate of permit renewals, new applications, operating reserve balance requirements, and staffing needs such as cost of living adjustments, step increases, and the creation of the Drilling Program.

Though the Program already analyzed increasing the application and renewal fees, it provides additional services that are not currently directly covered by these fees. These include pre-application meetings, non-special inspections, complaints, compliance efforts, and reclamation efforts. These activities may lead to significant additional time spent on tasks that are not tied to specific fees. As a result, the Program may struggle to provide adequate services to applicants and permittees.

Permittees shared mixed feelings about fees with some supporting increased fees in hopes the Program will have sufficient resources and staff to reduce permit application delays. Others were hesitant to support higher fees as they can be prohibitive to certain applicants in the industry.

### RECOMMENDATION

The Program should move forward with the proposed fee increase to support additional capacity to review applications more quickly and allow the Program to better fulfill its full scope of services (also see [Staff Workloads](#) section). In particular, the application fee should be increased to more appropriately align with the costs of reviewing applications, since this is a primary area of focus for the Program and a source of frustration among permittees.

To support both the Program and applicants, DOGAMI should establish a clear policy for annually updating fees based on the CPI. This policy should define the adjustment formula, specify the CPI index to be used, and outline the frequency of adjustments. Regular policy reviews will ensure it



remains relevant and responsive to economic conditions, ultimately fostering a fair and sustainable fee structure that benefits both DOGAMI and its applicants. This frequent or phased approach based on national cost increases can help mitigate financial impacts, making it easier for applicants to manage and plan for fee increases.

The Program will need to continue to balance fee increases with their effects on applicants and permittees. DOGAMI should effectively communicate this policy to stakeholders, providing advance notice of any fee changes well in advance of implementation. This communication should clearly explain the rationale and potential benefits, such as additional staffing and improved systems to reduce delays in the application process.

C. STAFFING

Staff Workloads

9.	Observation	Some staff reported high workloads and limited capacity, likely due to low staffing levels, reliance on sole contributors, and some process inefficiencies.
	Recommendation	Prioritize adding a Lead Aggregate Reclamationist, three Reclamationists, four Field Inspectors, and a Business Supervisor to address Program operational gaps and expedite permitting processes.

OBSERVATION

DOGAMI staff reported high workloads and limited capacity. This is likely due to low staffing levels and some process inefficiencies. The Program currently has 15 staff members, and more than half of these positions reported workloads that exceed capacity. Most of these positions are sole contributors or SMEs who do not have backup or someone cross-trained in their positions. Some of these positions include reclamationists with particular specialties (e.g., floodplains, mining geology, aggregate permitting, and water quality), and the only GIS specialist balances GIS work with other responsibilities such as IT support for DOGAMI.

These sole contributors can create bottlenecks for permits that need specific reviews when staff are already working on other applications or out on leave. This reliance on individual contributors increases the risk of delays in the permitting process, as the absence of a key person can halt progress entirely. Additionally, it can lead to inconsistencies in decision-making and quality of reviews, as different staff members may have varying levels of expertise and understanding of the requirements. Furthermore, the lack of collaboration can result in missed opportunities for knowledge sharing, which is essential for improving efficiency and addressing complex issues. Overall, depending too heavily on sole contributors can undermine the overall effectiveness and responsiveness of the permitting process.

In addition to sole contributors, the Program does not have adequate staff for all of its statutory functions as detailed in ORS 516-517. For example, the statute states the Program should process reclamation bonds as noted in ORS 517.810-815. However, staff do not have capacity to complete this work with their current workloads.



High workloads may also be exacerbated by manual and inefficient processes (see the [Timeliness and Backlog](#) section). Elevated workloads can further impact service levels, accuracy, employee morale, and overall process efficiency. Managing workloads is not a one-time activity. The Program recently developed a staffing plan for the new budget period, requesting 12 additional positions (two of which relate to the drilling program and were not assessed) that will help support current workloads and support the overall responsibility of the Program. The proposed staffing plan includes the following:

- Field Inspectors/Permit Specialists to meet existing site inspection targets and exceed key performance metric targets (4 FTE)
- Reclamationists to add technical expertise and permit leads to distribute workload and address application backlog (3 FTE)
- Office Specialist to increase complaint and general inquiry response times and improve customer service (1 FTE)
- Supervisory position to oversee MLRR office for improved operational functionality and promote staff development and retention under appropriate manager span of control (1 FTE)
- Operations and Policy Analyst to develop training and outreach materials for permittees and the public, facilitate Program-wide alignment of regulations and practices, and promote stakeholder and public engagement (1 FTE)
- Dedicated Drilling Program (2 FTE)
  - These positions were not assessed as part of this audit.

## RECOMMENDATION

In our review of DOGAMI's staffing plan, we substantially agree with the additional staffing proposed with some modifications:

- **Supervisor Capacity:** Hire a Lead Aggregate Reclamationist to help oversee the permitting process, provide quality assurance on reviews, and help guide technical staff on processes and expectations. This position would support the current Program Manager by taking over most of the technical reviews. In addition, continue with plans to hire a Business Supervisor to slightly reduce the span of control of office level staff and move some administrative workload from the Program Manager to this position (also see [Managerial Span of Control](#) section).
- **Reclamationists:** The proposed staffing plan includes several technical experts, but the proposed additions do not support existing reclamationists with niche specializations such as floodplain or stormwater. Floodplains were noted as a particular important area of expertise as floodplain-related permits take additional time and resources to review. Prioritizing SMEs such as floodplain experts will help support these positions that tend to have high workloads due to the high demands for their expertise. In addition, it's important to have additional personnel for succession planning and continuity of these reviews that are required and in the normal operation of the Program. Therefore, we recommend that the proposed staffing be adjusted to include one of the proposed reclamationists to specifically support floodplain reviews.

Because DOGAMI's fee schedule and staffing plans are subject to legislative approval, we included a hiring order that we recommend the Program use to hire staff. Positions 1-5 are essential for implementation of the recommendations included in this report. Positions lower on the list are those that are more support in nature or that may be supplemented with additional resources such as the e-Permitting system or the use of AI.



POSITION	CLASS	HIRING ORDER	ORDER RATIONALE
Lead Aggregate Reclamationist (NRS4) <i>(New Position Recommendation)</i>	NRS4	1	This position is a critical need as this position will support the entire permitting process, help refine and document the processes, provide technical review support, and improve some staff capacity.
Reclamationist (Floodplain Focus)	NRS4	2	This position is a high priority for staffing to relieve the pressure and current bottlenecks in floodplain reviews.
Reclamationist	NRS3	3	This position is a high priority for staffing to reduce current high workloads on reclamationists.
Reclamationist	NRS3	4	This position is a high priority for staffing to reduce current high workloads on reclamationists.
Field Inspector/Permit Specialist	NRS 2	5	This position is a high priority for staffing to reduce the backlog of inspections.
Business Supervisory position	BOS 2	6	This position should be hired after a field inspector to reduce the Program Manager's span of control. This position is also important to oversee the MLRR program office.
Field Inspector/Permit Specialist	NRS 2	7	This position should be hired after hiring one field inspector/permit specialist to catch up on inspections and create a proactive inspection process.
Field Inspector/Permit Specialist	NRS 2	8	This position should be hired after hiring one field inspector/permit specialist to catch up on inspections and create a proactive inspection process.
Field Inspector/Permit Specialist	NRS 2	9	This position should be hired after hiring one field inspector/permit specialist to catch up on inspections and create a proactive inspection process.
Operations and Policy Analyst	OPA 3	10	This position is important to expand the compliance program resources but the other positions are a higher priority.
Office Specialist	OS 2	11	This position is a lower priority for staffing, and the need may decrease as other efficiencies and use of AI are adopted.

Throughout these staffing changes, staff should continuously monitor data on workloads and efforts should be continued to support maintaining balanced workloads over time. This will help ensure that staff have sufficient capacity to carry out their assigned duties and the Program has enough staff to fulfill its mission.





## Managerial Span of Control

10.	Observation	The Program Manager has a large span of control over a highly technical team, which can lead to burnout and bottlenecks and limit planning and strategy.
	Recommendation	<ul style="list-style-type: none"><li>A. Create a Lead Aggregate Reclamationist position to support the permitting process and provide additional technical support.</li><li>B. Move forward with hiring the Business Supervisor as proposed in the staffing plan to alleviate the current manager's span of control.</li></ul>

### OBSERVATION

In addition to sole contributors, the Program Manager directly oversees all 14 staff in the Program. For teams with standardized practices, the best practice span of control is typically 1:11 to 1:15.<sup>2</sup> This varies based on the experience, roles, responsibilities, and authority of leaders, as well as Program size, complexity, and oversight within each level. Best practices suggest a narrower span of control (4 to 7 direct reports) for specialized, highly complex work that requires detailed oversight, frequent decision-making, and regulatory compliance. DOGAMI's technical reviews are characterized by elevated complexity and frequent decision-making and therefore this team should have additional oversight and managerial support.

High spans of control, or the number of direct reports per supervisor, can limit a manager's ability to support employee career growth and development. For the Program Manager, this can increase the likelihood of burnout and bottlenecks, or create the inability to dedicate time to leadership activities like planning and strategy, and result in more time dedicated to reactive work characterized as "putting out fires."

### RECOMMENDATION

DOGAMI should hire a Lead Aggregate Reclamationist to support the permitting process and the current Program Manager. This position can support technical reviews, provide peer reviews for permits, and provide training and guidance for permitting staff.

The business supervisory position recommended in the staff plan will provide will also support the Program Manager by slightly reducing span of control by overseeing the office staff. This position can also provide additional administrative support to the Program and Program Manager.

This position will give the Program Manager additional capacity for strategic management of the Program including higher level decision-making, resource allocation, and team coordination. This can ultimately lead to a more successful and well-managed Program.

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<sup>2</sup> [Span of Control Best Practices](#)



# Staff Decision-Making

11.	Observation	DOGAMI staff exhibit a high level of risk aversion in decision-making due to historical concerns about personal liability.
	Recommendation	Empower staff to make informed, risk-based decisions by providing reassurance to staff about the legal protections afforded to them under Oregon State law and developing decision guides.

## OBSERVATION

DOGAMI staff seem to exhibit a notable level of risk aversion when making individual decisions; permittees indicated that staff often delve deeper into issues than may be statutorily or administratively required. This cautious approach was mentioned in permittee interviews and survey results for areas such as land use and mapping boundaries. There is a growing concern that staff members' perceptions of personal liability have contributed to delays in their decision-making processes.

While DOGAMI staff are protected by Oregon State law from personal liability when acting within the scope of their positions, the lingering fear of potential repercussions may hinder their confidence in making timely decisions. This risk aversion may be rooted in historical concerns about the implications of issuing permits that could lead to environmental harm. Despite legal assurances that reasonable errors do not expose employees to personal liability, misunderstandings, past experiences, and a history of in-agency mistrust may perpetuate this cautious mindset.

However, excessive caution poses risks to the Program. When staff are hesitant to make decisions, it can slow down the permitting process and create inefficiencies in Program operations. This reluctance to act can stifle proactive decision-making, preventing the Agency from responding effectively to regulatory duties and applicant needs. Ultimately, fostering a culture that encourages confident decision-making, supported by clear communication about legal protections, is crucial for enhancing the efficiency and effectiveness of the Program's operations.

## RECOMMENDATION

DOGAMI management should actively empower staff to make informed decisions by providing education and reassurance to staff about the legal protections afforded to them under Oregon State law. If management feels it to be necessary, this initiative may include a coordinated session with a legal expert available to DOGAMI through the Department of Justice, with the goal of clarifying the scope of their professional liability and the conditions under which they are protected from personal liability.

This recommendation aims to alleviate any undue fear of personal liability among staff, which hampers efficient decision-making. If legal safeguards in place are reinforced, staff can operate more confidently in their roles and make decisions aligned with statutory requirements without excessive caution. Ideally, this initiative might also increase job satisfaction and reduce stress associated with fears of personal liability.

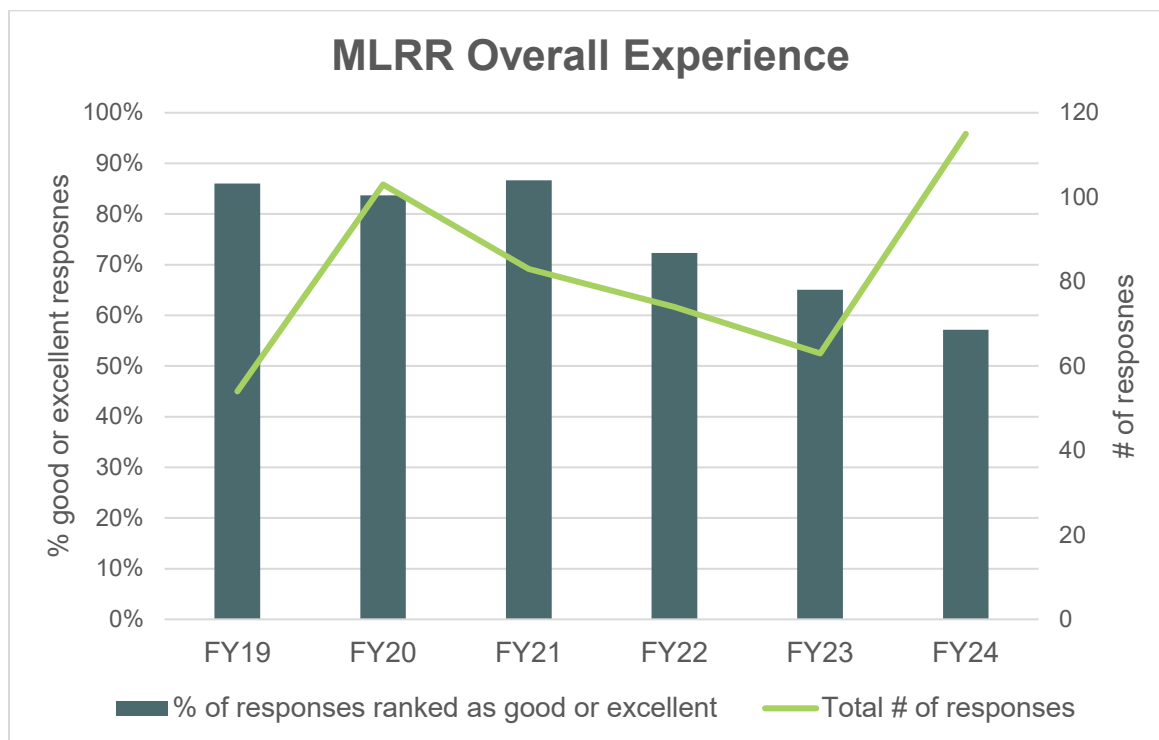
The Program can also consider developing and distributing a decision-making framework that outlines the criteria and processes for making decisions in various situations. This framework should



include guidelines on when to escalate issues, how to assess risk, and emphasize the importance of timely action.<sup>3</sup> By having a structured approach to decision-making, staff can feel more equipped to act without excessive hesitation. Management can reinforce these ideals by recognizing and rewarding proactive decision-making and problem-solving. This could involve creating a recognition program that highlights successful decisions made by staff, reinforcing the value of taking initiative and making decisions.

## D. CUSTOMER SERVICE

Every year, DOGAMI issues a stakeholder survey soliciting feedback on customer satisfaction. Within this survey, responses relating to MLRR are isolated. DOGAMI asks stakeholders to rate five main aspects of customer services, assessing timeliness, accuracy, helpfulness, expertise, and availability of information. DOGAMI's annual Performance Progress Report publicly reports the percentage of responses ranking each category as “good” or “excellent.” See the aggregated responses for MLRR customer service questions below.



Since fiscal year 2021, DOGAMI's customer service ranking dropped from 86.7% to 57.2% three years later. One possible explanation for the drop in customer satisfaction is DOGAMI's increased compliance efforts and regulatory standards. As DOGAMI intensifies its efforts to bolster compliance and accountability within its regulatory scope, there has been a noticeable decline in customer satisfaction. This trend suggests that while stricter enforcement may enhance regulatory adherence, it also poses challenges in maintaining positive relations with stakeholders, who may perceive these increased measures as overly stringent or burdensome. Another explanation may include the move

<sup>3</sup> [Example Decision-Making Templates](#)



towards comprehensive reviews, which extends the application processing times, potentially accounting for the decline in timeliness rankings. Other explanations may stem from employee turnover, which may lead to a decrease in stakeholder rankings of MLRR staff expertise.

In the next sections, we explore two major aspects of customer service: 1) the communication that occurs during the application process and 2) the education and outreach that occurs year-round.

## Application Deficiencies

12.	<b>Observations</b>	Although the Program has set communication practices, communication to applicants regarding their deficiencies are sometimes sent one at a time rather than when a list is complete, which can result in conflicting notes being issued.
	<b>Recommendation</b>	Ensure that one dedicated staff member is consolidating deficiencies from various reviewers and reviewing alignment in comments before communicating this information as a complete list to applicants.

### OBSERVATION

Across both permittee interviews and survey results, Program staff were consistently praised for their responsiveness, professionalism, courtesy, and subject area expertise. The consistency of this feedback likely speaks to the supportive and genuine environment that the Program's management has cultivated. Based on staff interviews, it seems that current management has overcome several obstacle — including tensions resulting from previous leadership and significant turnover — in order to achieve these results.

In the permittee survey, participants were asked how they would rate the general responsiveness of permit reviewers throughout the permitting process. By far, the most common response (at 46%) was "Usually responsive." Given the staff's intensive workloads, this level of outreach is notable. The professionalism and courtesy of administrative staff was also a high point in the survey, with 22% of participants responding "Excellent" and 36% of participants responding "Good." Permittees reported good working relationships with staff and admiration for their skills, dedication, and helpfulness.

However, when it comes to the processes staff support, there may be room for improvement. Currently, the Program's communication with applicants regarding deficiencies in their submissions is sometimes sent incrementally, rather than providing a complete list once all deficiencies have been identified. This practice was likely started with efficiency in mind; as applicants receive some deficiencies, they are able to start working to resolve those issues. However, because of long turnaround times in both applicant responses and technical reviews, this iterative approach can delay the overall permitting process. Applicants reported needing to consult technical experts to address some deficiencies, which was made more difficult by not knowing all deficiencies for the expert to address at the same time. This approach also led to some confusion, as seen in instances where applicants were unsure of how far along in the application process they were, or whether their application would be approved if they addressed the deficiencies reported to them initially. However, additional requests sometimes result from additional information that is provided. For example, a new boundary map may include additional areas that then need a floodplain review and study.

In survey results, found in [Appendix A](#), two questions spoke to issues within the application revision process.



- When asked “If revisions were needed for your application, were the comments clear and concise?”, 58% of respondents answered affirmatively. While it is commendable that more than half of respondents characterized revisions positively, there is room for growth in this area.
- When asked “If revisions were needed for your application, were the comments consistent with prior feedback or comments?”, respondents were split exactly, with 50% saying “Yes” and 50% saying “No.” Consistency is key in establishing trust and efficiency, so this result also leaves room for growth.

This fragmented communication method may result in contradictory comments and increase applicant frustration due to perceived piecemeal deficiencies. Such inconsistencies can undermine stakeholder trust and potentially delay the resolution of application issues, impacting the overall efficiency of the permitting process.

Some applicants compared their experience to other agencies and other industries with more standardized communication processes, where all issues with an application are compiled into a comprehensive list and communicated concisely to the applicant at one time. Ideally, DOGAMI’s process would send feedback in a more concise and systematic manner.

### RECOMMENDATION

While e-Permitting may address many of the issues with providing piecemeal deficiencies, implementation is not anticipated to begin until 2026. The Program should implement an interim standardized communication protocol to enhance clarity and consistency in interactions with applicants until the e-Permitting system is operational. This protocol should include specific guidelines on when and how to communicate deficiencies during the application review process.

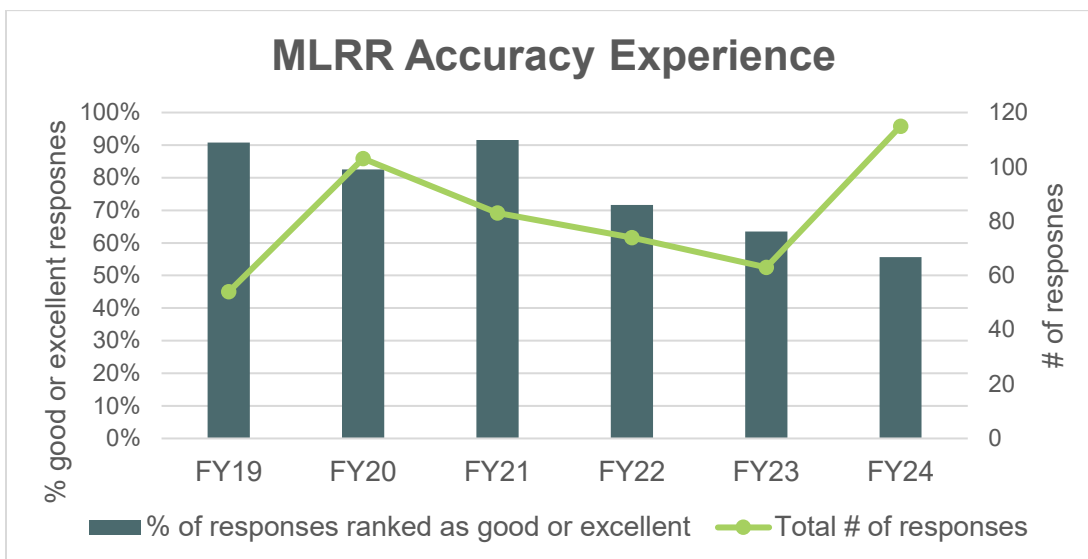
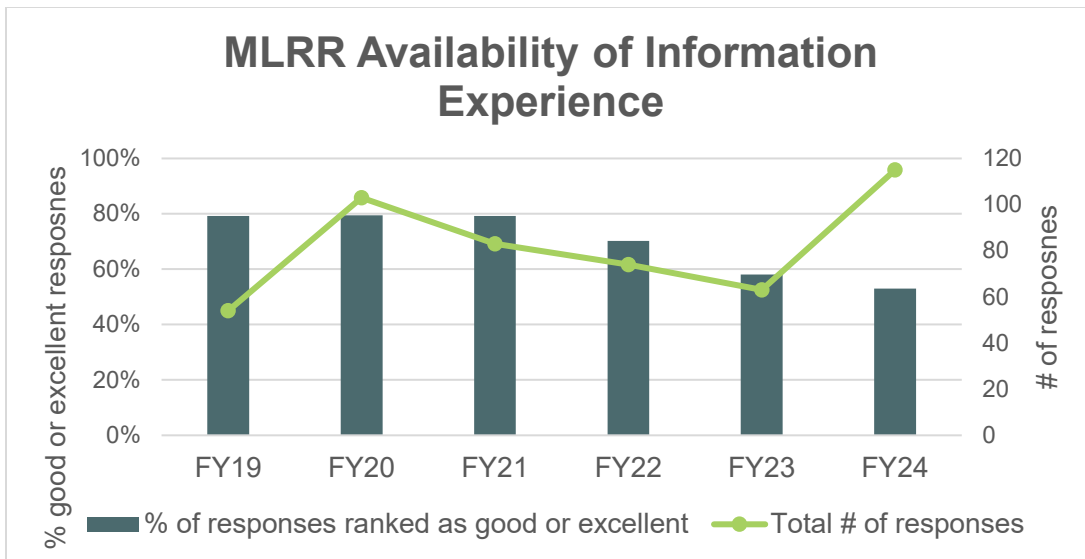
While current practice already includes a dedicated staff member responsible for each application, the Program should ensure that staff member is able to fully review each application before external communication. This includes consolidating feedback from various reviewers and communicating this information as a complete list to applicants. This would ensure that communications are consistent, comments across reviewers align, and deficiencies are addressed collectively rather than piecemeal.

## Education and Outreach

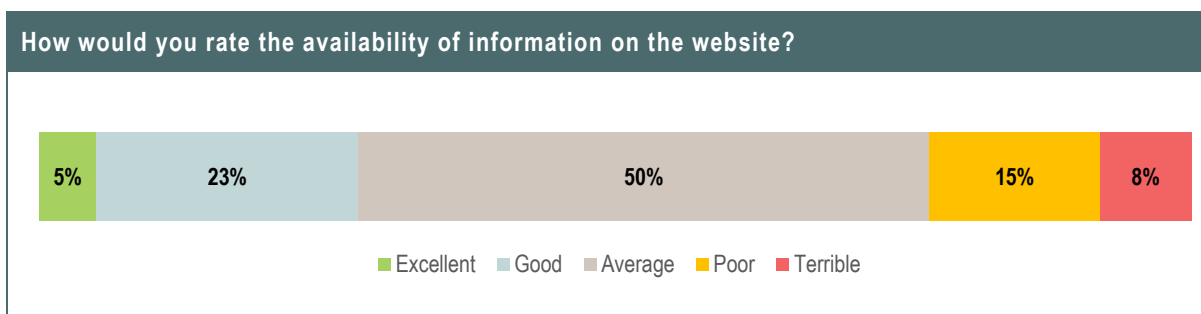
13.	Observation	DOGAMI's limited and primarily reactive education and outreach efforts are constrained by limited staff capacity, which may lead to difficulty processing application submissions and strained relationships with applicants, affecting the efficiency of the permitting process.
	Recommendations	<p>A. DOGAMI should prioritize small-scale educational improvements that yield significant benefits, starting with ensuring that application forms on the website are consistent with internal standards, and that examples of application materials provided on the website are relevant.</p> <p>B. In the long term, the Program will likely need to increase the number of staff hours dedicated to educational outreach.</p>

### OBSERVATION

DOGAMI administers annual surveys to determine how the permitted community experiences aspects of the MLRR application process, including the availability of information and accuracy.



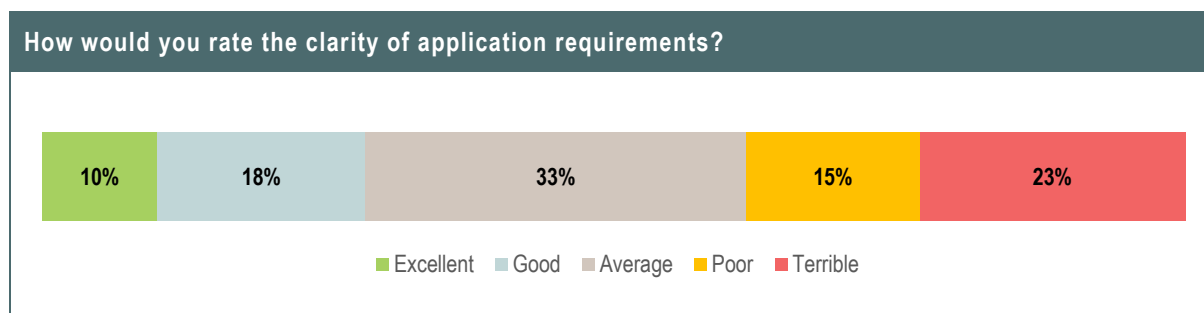
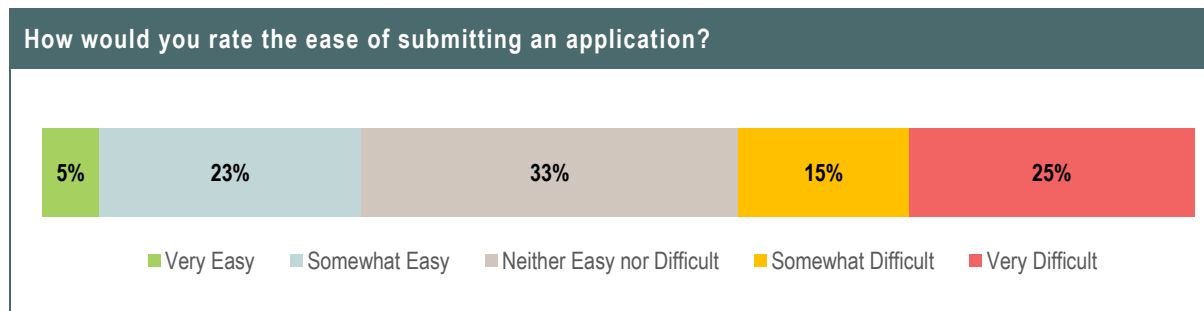
In the Moss Adams stakeholder survey, comparable ratings varied. For instance, one survey question asked respondents to rate their overall experience with the availability of relevant information on DOGAMI's website in the last few years. Twenty-eight percent of respondents rated the availability of relevant information good or excellent, with 5% rating it "Excellent" and 23% rating "Good."





Respondents to the MLRR annual survey were more favorable than those to the Moss Adams survey. The Moss Adams survey focused on a subset of application interactions while the MLRR survey covered all program interactions, including interagency, tribes, counties, and complaints. This resulted in a slight difference in responses around applicant interactions.

Forty percent of Moss Adams' survey respondents rated staff knowledge and helpfulness as good or excellent. This may be because although other sources of information, like staff, might be excellent, more education and clear requirements could be available on DOGAMI's website. On the other hand, ratings on the ease of submitting an application and clarity of application requirements leaned towards the lower end of the spectrum, as evidenced below.



Having a single question on informational availability may be an obstacle to DOGAMI correctly understanding the need for clarity and education within the permitted community. There may be a greater need for clear expectations through website materials in order to promote a shared understanding of compliance and permitting, including clarification on roles and responsibilities, as well as overall application requirements.

### ***Current Efforts***

The Program currently engages in several education and outreach activities, including distributing newsletters, conducting periodic water quality permit workshops, and maintaining communication with applicants. However, these efforts are somewhat limited and — with the exception of the newsletter — primarily reactive, often triggered by complaints, actions, or specific requests. Many staff in the Program reported ideas and strong desires to improve educational efforts. For instance, the Program has considered implementing video tutorials to enhance outreach. However, the Program lacks the capacity to develop these resources due to existing workload pressures. The website features links and resources, but the user-friendliness and effectiveness of these tools have not been fully assessed. Moreover, staff constraints prevent extensive direct communication with applicants, as the





limited number of personnel cannot dedicate significant time to phone consultations without impacting other responsibilities.

Ideally, DOGAMI would be able to provide comprehensive and proactive education and outreach to all applicants and permittees. This should include easily accessible, clear, and helpful resources such as video tutorials, regularly updated guidance documents, and more interactive opportunities for learning and feedback. Outreach efforts should be designed to preemptively address common issues and improve the quality of application submissions. Currently, staff capacity limits the Program's outreach and education efforts. Existing personnel are stretched thin across multiple duties, making it challenging to allocate adequate time for developing and implementing more effective educational tools and strategies.

These challenges present a causal loop where limited staff capacity can result in a shortage of educational materials, and conversely, the lack of these materials may further exacerbate the strain on staff time. The insufficient scope of current education and outreach activities can lead to subpar application materials and frequent miscommunications. This hinders the efficiency of the permitting process. Inadequate outreach efforts may result in increased compliance issues and a higher volume of preventable errors in submissions, ultimately impacting the regulatory effectiveness and stakeholder satisfaction.

Additionally, both staff and applicants reported a gap in the level of technical communication between DOGAMI and permittees. Effective communication should bridge the technical language used by DOGAMI and the varying levels of expertise among applicants, either through the use of more suitable examples by the Program or the hiring of consultants by applicants. The goal is to ensure that all communications are accessible and comprehensible to applicants, regardless of their technical background.

All applicants have different backgrounds, levels of technical sophistication, and resources. Large companies who often have technical consultants reported less difficulty understanding technical requirements, while smaller applicants struggled more to comply.

Unclear communication leads to misunderstandings and incomplete or incorrect application submissions. This not only slows the review process but also frustrates applicants who feel inadequately supported.

## RECOMMENDATION

In the short term, there may be small-scale educational improvements that DOGAMI can make with current staff. In the long term, staffing capacity will need to be addressed through increased staff who can dedicate additional time to education and outreach materials.

In the short term, DOGAMI should prioritize small-scale educational improvements that yield significant benefits, starting with ensuring that the application forms on the website are both consistent with the internal forms used for identifying deficiencies, and technically accessible to applicants with different backgrounds. Additionally, the Agency should review and compare the examples of application materials provided on the website with actual submissions to assess their relevance and effectiveness. This recommendation aims to reduce confusion and errors in application submissions by providing applicants with accurate and representative examples and forms. This alignment may help applicants better understand expectations and reduce deficiencies.



When possible, Program staff could prioritize time to review the publicly accessible application forms and examples currently available on the website and identify discrepancies between these resources and the actual submissions or internal deficiency forms. Based on this review, staff should update the forms and examples to more accurately reflect the submissions that meet DOGAMI's standards. It may be worthwhile to consider using successful past submissions as templates for new examples. However, we acknowledge the difficulty of providing concrete examples for permit applications, given that the scope of each permit application is unique.

By aligning online resources more closely with actual requirements and by providing more accessible examples, DOGAMI can enhance the clarity and utility of its guidance, leading to better-prepared submissions and fewer deficiencies, ultimately streamlining the review process.

DOGAMI could also consider the development of a general permit with clear guidelines. A general permit is a type of permit that covers a broad category of activities or facilities, rather than a specific individual project or location, streamlining the permitting process for activities without changing the ability to regulate environmental impact (ORS 517.790). Currently, ORS 517.790(1) provides that "[a] separate permit is required for each separate surface mining operation," which staff interpret to preclude a general permit.

Staff reported that a general permit could simplify the application and administration of the permit process by defining specific parameters of operation and reclamation for a subset of mining operations. This would provide a choice for permittees to either comply with the parameters of the general permit – which might be faster and less expensive, while also being more prescriptive – or to opt for the traditional site-based permit – which might be slower and more expensive, but individualized.

DOGAMI reported it plans to request an amendment of ORS 517.790 to authorize general permits and to allow rules to implement a general permit program in the 2027-29 Agency Request Budget. This effort would require staff to complete rule making and permit development and implement the program. After successful implementation, the permitting workload of the Program would likely decrease overall because of a reduction of complexity in permits. Moving forward with this decision might lead to significant long-term process improvements.

In the long term, it will likely be necessary to increase the number of staff hours dedicated to educational outreach and develop more comprehensive resources, including video tutorials, detailed guidance on the website, and regular training sessions. This recommendation seeks to address the current limitations in DOGAMI's educational outreach caused by staffing constraints and enhance the Agency's ability to provide proactive and extensive support to applicants. If additional funding through a fee increase is secured, the Program may be able to dedicate more staff time towards educational outreach and support. Then DOGAMI should then conduct regular training workshops or webinars, ensuring they are accessible to all applicants and cover a range of relevant topics.

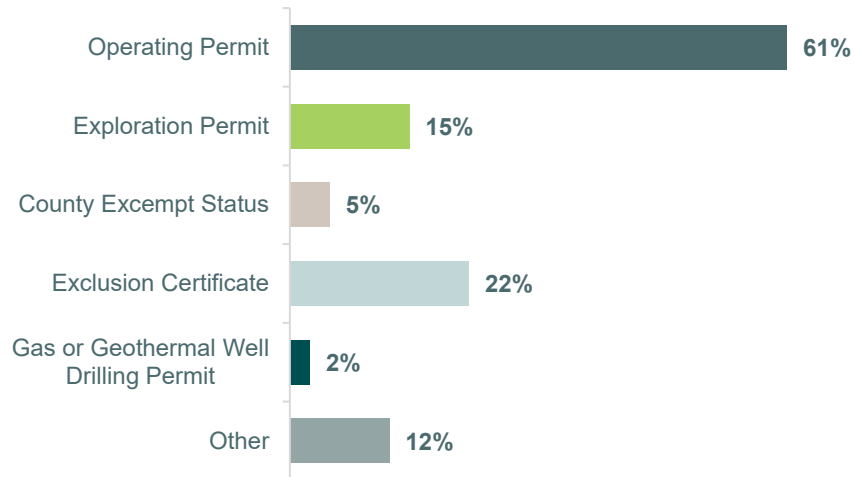
With more resources, DOGAMI could improve applicant understanding and compliance, reduce errors in submissions, and strengthen relationships between the Agency and its stakeholders (also see [Permit Application Fee](#)).



## APPENDIX A – PERMITTING SURVEY

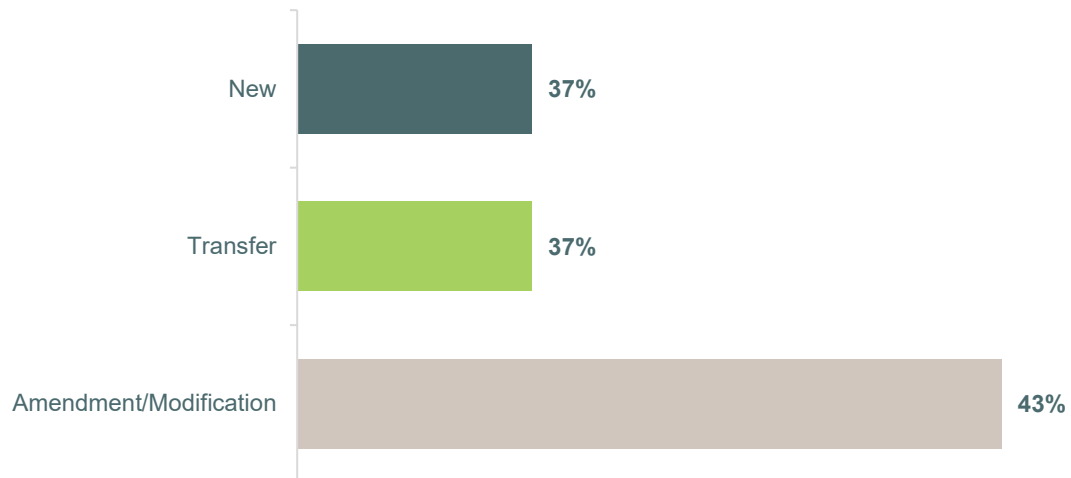
### Background and Overall Experience

What types of permit(s) have you applied for or were permitted in the last few years?



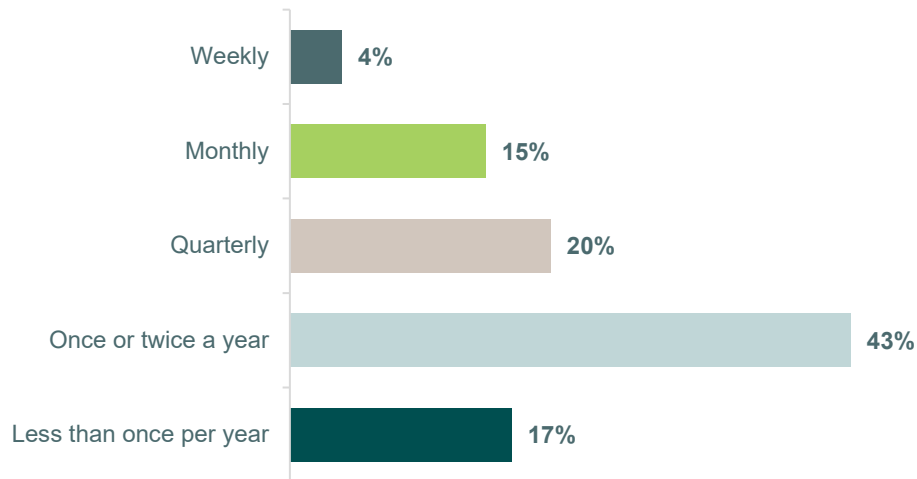
*Other responses: surface mine expansion, amendment, DEQ, and a chemical permit*

What types of permit(s) actions have you applied for or were permitted in the last few years?





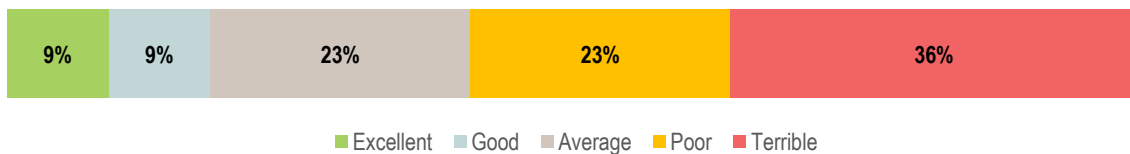
On average, how often have you interacted with DOGAMI related to permitting (applying for permits, plan reviews, inspections, etc.) in the past year?



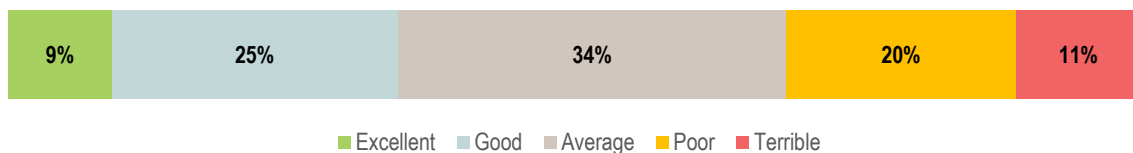
## General Service Experience

How would you rate the following services, based on your overall experience with DOGAMI in the last few years?

### Timeliness of permit decision making



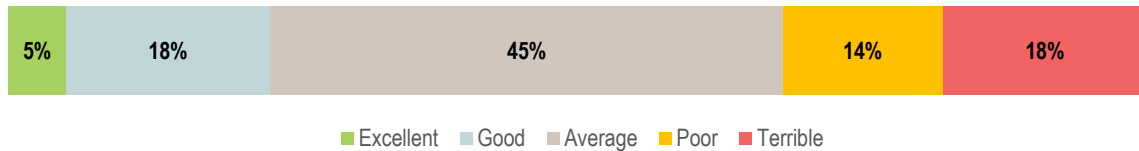
### Clarity of roles and responsibilities during the process



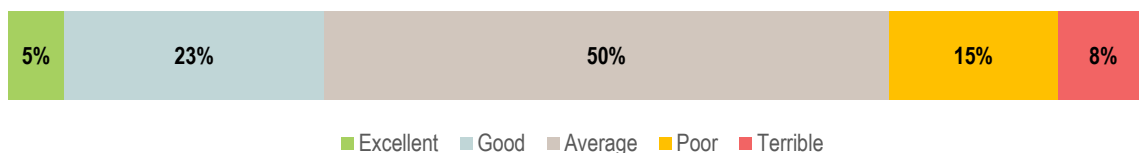


How would you rate the following services, based on your overall experience with DOGAMI in the last few years?

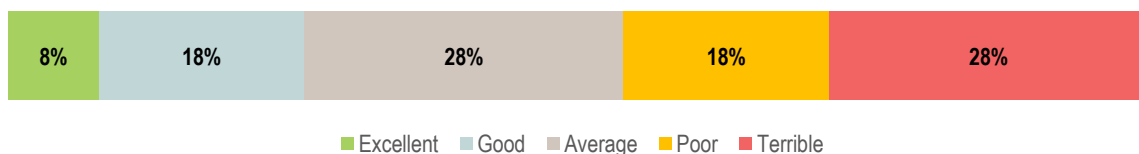
#### Frequency of communication from DOGAMI



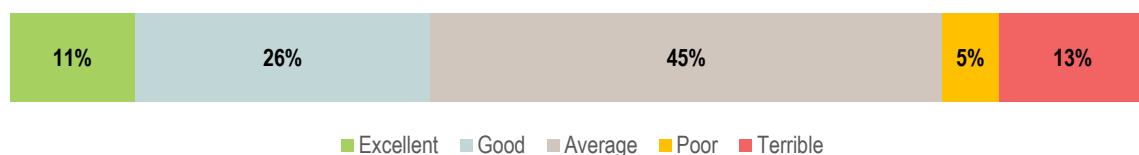
#### Availability of relevant information on the website



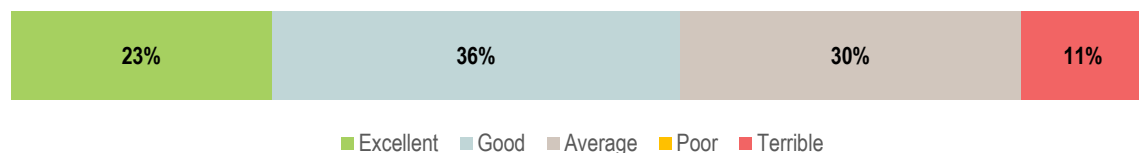
#### Consistency in the permit application process



#### Consistency in renewal process communication from staff



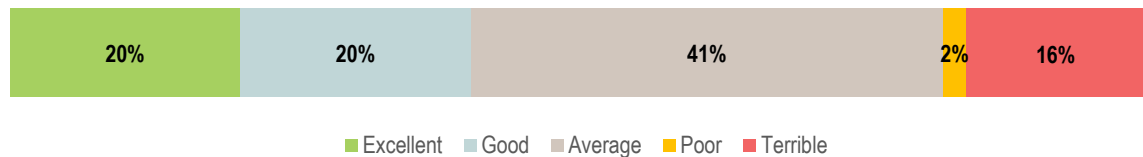
#### Professionalism and courtesy of administrative staff



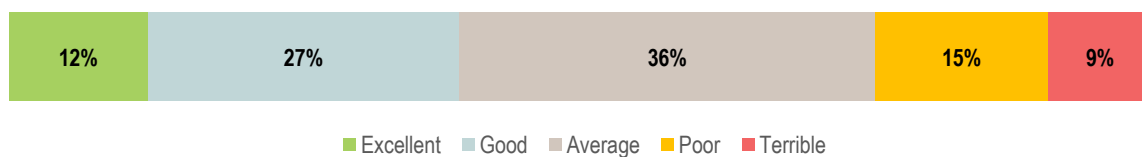


How would you rate the following services, based on your overall experience with DOGAMI in the last few years?

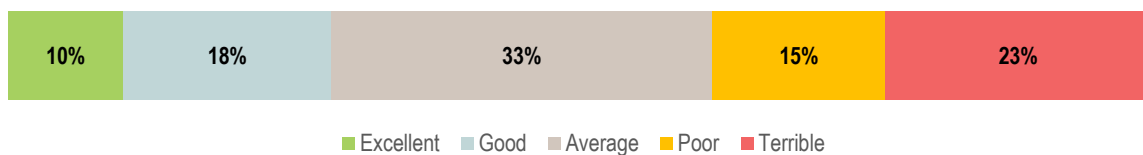
**Staff knowledge and helpfulness in handling permit application and questions**



**Quality and relevancy of pre-application meetings**

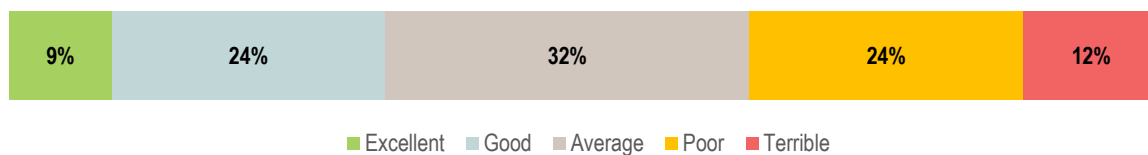


**Clarity of application requirements**



How would you rate your experience with DOGAMI's role in providing coordination with the following organizations?

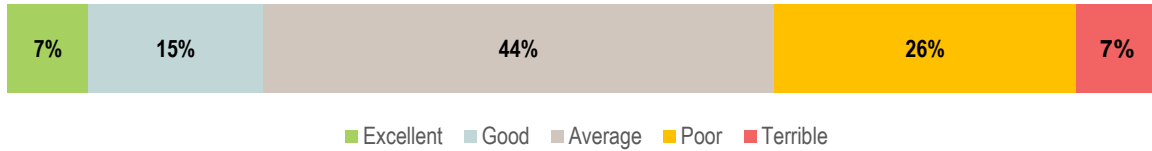
**Other agencies and permitting partners such as the Department of Environmental Quality, Department of State Lands, Oregon Department of Fish and Wildlife, Water Resources Department?**



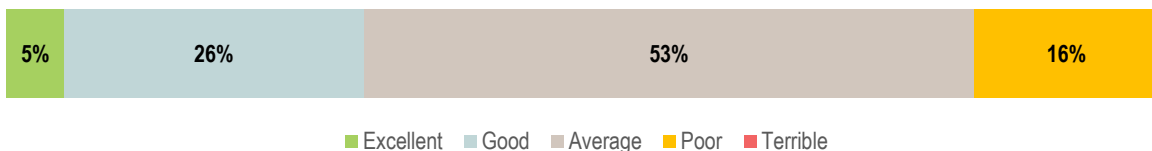


### How would you rate your experience with DOGAMI's role in providing coordination with the following organizations?

#### Local land use authorities (e.g., county, city government)?

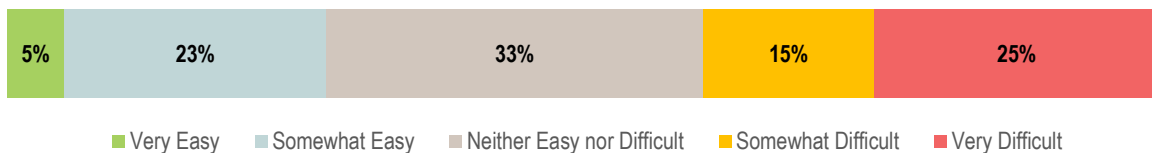


#### Tribal Governments and Oregon State Historic Preservation Office (SHPO)?



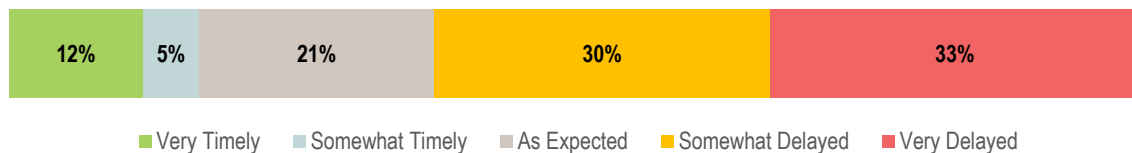
## Permitting Review Process

### How would you rate the ease of submitting an application?



### How would you rate the turnaround times for the following steps in the permitting process?

#### 1) Review of application for completeness (required elements present, e.g., forms, fees, maps)







## How would you rate the turnaround times for the following steps in the permitting process?

### 2) Review of application for technical information (plans, maps and other required materials technically sufficient)



Very Timely Somewhat Timely As Expected Somewhat Delayed Very Delayed

### 3) Subsequent reviews of revisions and additional materials



Very Timely Somewhat Timely As Expected Somewhat Delayed Very Delayed

### 4) Scheduling of site inspection and follow-up inspection report



Very Timely Somewhat Timely As Expected Somewhat Delayed Very Delayed

### 5) Preparation of draft permit and circulation to reviewing agencies



Very Timely Somewhat Timely As Expected Somewhat Delayed Very Delayed

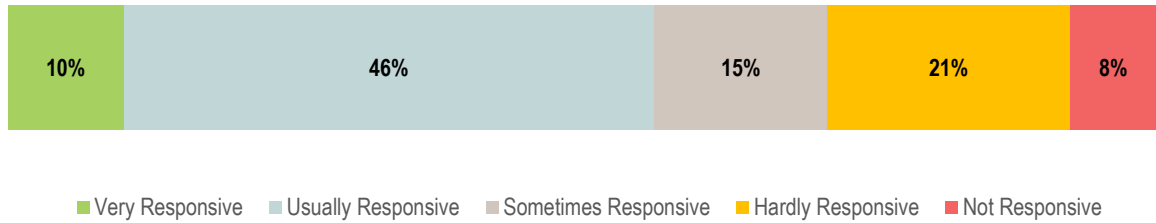
### 6) Once comments were resolved, issuance of permit



Very Timely Somewhat Timely As Expected Somewhat Delayed Very Delayed



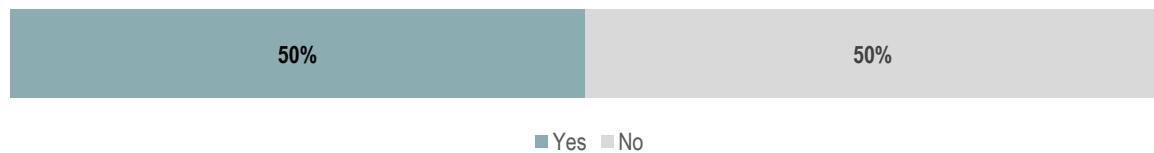
### How would you rate the general responsiveness of permit reviewers throughout the permitting process?



### If revisions were needed for your application, were the comments clear and concise?

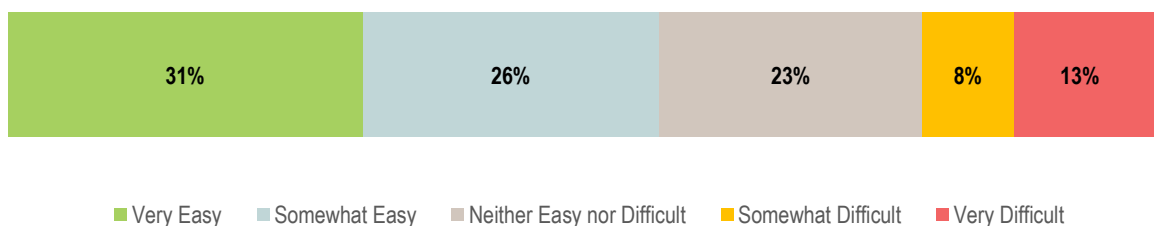


### If revisions were needed for your application, were the comments consistent with prior feedback or comments?



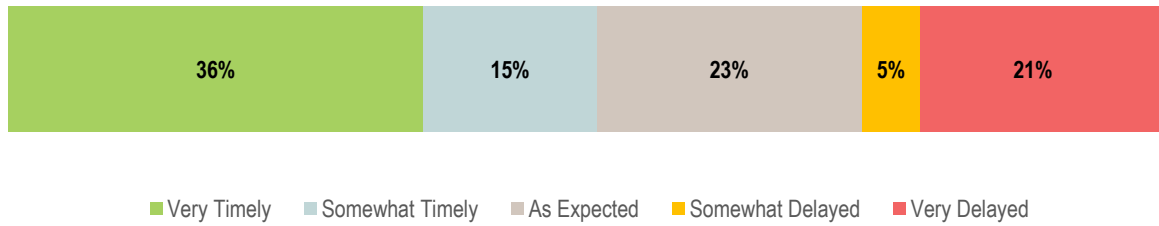
## Renewals and Inspections

### How would you rate the ease of the permit renewal process?

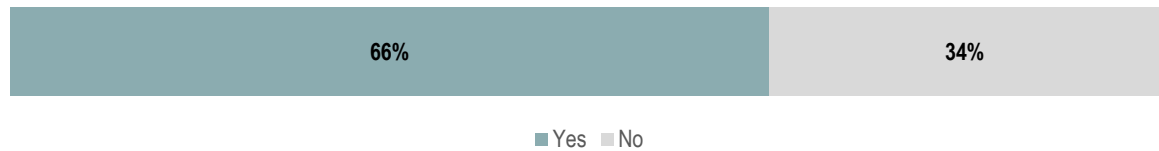




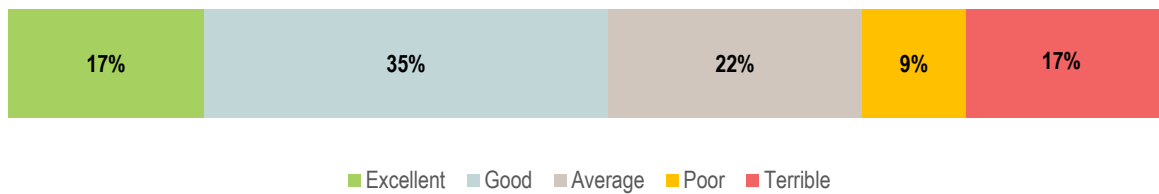
### How would you rate the timeliness of the permit renewal process?



### Has your site been inspected in the past 5 years?



### How was your experience with the inspection?





## APPENDIX B - IMPLEMENTATION PLAN

The Implementation Plan table details a proposed implementation plan associated with the permitting audit recommendation. The table includes a column with additional staff resources, including positions recommended in the current staff plan, that are needed to implement the recommendation(s).

The implementation plan is organized by order of priority. Each item includes a result of “Critical,” “High,” “Medium,” or “Low” as defined in the Implementation Plan Summary Definitions table below.

### Implementation Plan Summary Definitions

Priority Status	Definition
Critical	Critical tasks are both urgent and important and demand action by management.
High	High-priority tasks are important but are not immediately urgent. These priorities often contribute significantly to long-term goals.
Medium	Medium-priority tasks are urgent but less important. These tasks require attention but don't contribute as much to overall objectives.
Low	Low-priority tasks have minimal impact and can be delayed or eliminated if necessary.



## Implementation Plan

#	OBSERVATION TOPIC	RECOMMENDATION	PRIORITY LEVEL	ADDITIONAL STAFF RESOURCES	TIMELINE
8	Permit Application Fee	A. Increase the permit application fee to better reflect the cost of staff time and resources in reviewing materials.	Critical	None, requires legislative action	Q3 2025
10	Managerial Span of Control	A. Create a Lead Aggregate Reclamationist position to support the permitting process, and provide additional technical support.	Critical	Lead Aggregate Reclamationist	Q3 2025
4	Interagency Circulation	A. Clarify DOGAMI's regulatory authority to coordinate requirements or other State agencies and communicate anticipated requirements from other agencies in a separate considerations section of pre-application meeting notes or deficiency letters.	Critical	None, can be done with existing staff	Q3 2025
9	Staff Workloads	Prioritize adding a Lead Aggregate Reclamationist Worker, three Reclamationists, and one Field Inspector to address Program operational gaps and expedite permitting processes.	Critical	Lead Aggregate Reclamationist, 3 Reclamationists, and 1 Field Inspector	Q3 - Q4 2025
12	Application Deficiencies	Ensure that one dedicated staff member is responsible for consolidating deficiencies from various reviewers and reviewing alignment in comments before communicating this information as a complete list to applicants.	Critical	None, can be done with existing staff	Q3-Q4 2025
10	Managerial Span of Control	B. Move forward with hiring the Business Supervisor as proposed in the staffing plan to alleviate the current manager's span of control.	Critical	Business Supervisor	Q4 2025
5	Inspections	To enhance inspection capacity and ensure consistent standards across all sites, increase operation fees to fund additional staffing, standardize inspection procedures, and centralize oversight of inspection staff.	High	3 Field Inspectors/Permit Specialists (4 total)	Q1 2026
3	Internal Peer Review Standard	A. Develop set review standards that outline consistent expectations for peer reviews.	High	Lead Aggregate Reclamationist and potentially	Q3 2025



#	OBSERVATION TOPIC	RECOMMENDATION	PRIORITY LEVEL	ADDITIONAL STAFF RESOURCES	TIMELINE
				temporary support	
7	Standard Operating Procedures	Complete development of SOPs to enhance consistency, efficiency, compliance, and quality control, with a focus on developing an SOP for completing a comprehensive review, peer review, and compliance processes.	High	Lead Aggregate Reclamationist and potentially temporary support	Q1 -Q2 2026
1	Timeliness and Backlog	A. Expedite permit processing and clear its application backlog by increasing staff capacity, implementing e-permitting, and integrating AI into the comprehensive review process.	High	Lead Aggregate Reclamationist and Reclamationists	Q3 2025
2	Comprehensive Review Process	A. Evaluate and document the comprehensive review process to ensure all steps are necessary for the review process while maintaining compliance with statutes and regulations.	High	Lead Aggregate Reclamationist and potentially temporary support	Q3 2025
2	Comprehensive Review Process	B. Explore using AI to assist in the comprehensive review process to streamline the process and restore staff capacity to work on other tasks.	High	None, may have associated consultant cost	Q4 2025
6	Compliance Program	A. Move forward with hiring an Operations and Policy Analyst as proposed in the staffing plan to expand compliance program resources.	Medium	Operations and Policy Analyst	Q3 - Q4 2025
3	Internal Peer Review Standard	B. Consider implementing a tiered review process to expedite low-risk decisions and enable additional review processes for high-risk or high-impact decisions or actions.	Medium	None, if completed after 3A	Q4 2025
11	Staff Decision-Making	Empower staff to make informed, risk-based decisions by providing reassurance to staff about the legal protections afforded to them under Oregon State law and developing decision guides.	Medium	None, may have associated cost for training.	Q4 2026
6	Compliance Program	B. Build a comprehensive internal framework that outlines specific procedures for the application of civil penalties.	Medium	Lead Aggregate Reclamationist	Q4 2025



#	OBSERVATION TOPIC	RECOMMENDATION	PRIORITY LEVEL	ADDITIONAL STAFF RESOURCES	TIMELINE
8	Permit Application Fee	B. Establish a clear policy for annually updating fees based on the Consumer Price Index (CPI) to help mitigate financial impacts on the Program over time.	Medium	None, requires legislative action	Q1 2026
1	Timeliness and Backlog	B. Establish performance measures that set goals for permit processing time by process type, implement tracking mechanisms, and report out on progress toward these goals on an annual basis.	Low	Operations and Policy Analyst	Q3 - Q4 2026
13	Education and Outreach	A. DOGAMI should prioritize small-scale educational improvements that yield significant benefits, starting with ensuring that application forms on the website are consistent with internal standards, and that examples of application materials provided on the website are relevant.	Low	Operations and Policy Analyst	Q3-Q4 2026
13	Education and Outreach	B. In the long term, the Program will likely need to increase the number of staff hours dedicated to educational outreach.	Low	None at this time	Q3-Q4 2026
4	Interagency Circulation	B. Encourage other agencies formally request extensions when needed and transparently communicate these requests to applicants to manage expectations and maintain clarity in the application timeline.	Low	None, can be done with existing staff	Q4 2026
6	Compliance Program	C. Explore options for incorporating more legal expertise into DOGAMI's compliance processes.	Low	None, may have consultant costs	Q1 2027



MOSSADAMS



# Staff Report and Memorandum

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To: Chair, Vice-Chair, and members of the DOGAMI Governing Board

From: Lori Calarruda, Executive Assistant

Date: June 17, 2025

**Regarding: Agenda Item 13 – Confirm Time and Date for Next Quarterly Meeting**

Currently the next DOGAMI Quarterly Board meeting is scheduled for Monday, September 15, 2025 in Portland or via Zoom.

***Proposed Board Action: The Board may be asked to take action on this item by Confirming or Amending the currently scheduled Board meeting date.***