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Oregon Department of Geology and Mineral Industries: Permitting Process Audit

May 19, 2025



Audit Objectives

DOGAMI engaged Moss Adams to conduct an audit of the MLRR Program's surface mining and exploration permitting process, which addressed the following objectives:

- 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

Our audit period covered January 2019 through December 2024.



Methodology

- Interviews:
 - We conducted interviews with all Program staff
 - We interviewed 10 external stakeholders (8 permittees and 2 consultants)
- Document Review:
 - Reviewed documents such as process maps, policies and procedures, and job descriptions
 - Assessed permit timelines based on applications received between January 2019 and December 2024
- Survey:
 - We conducted a survey of 168 permit applicants and received 46 responses, resulting in a 27% response rate



Permit Timeliness

- The process of completing a permit takes approximately a year
- The Program has a backlog of 100 applications

Total Days from Permit Application to Permit Decision

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





Factors Impacting Permit Processing Timelines

- Back and forth communication with applicant
- Comprehensive review process
- Internal review standards
- Interagency review
- Staff workloads
- Reliance on sole contributors



Additional Operations

Inspections

- DOGAMI aims to inspect mine sites every 5 years
- The Program faces a backlog of mining site inspections due to understaffing
- Inspections occur in response to permitting actions, compliance issues, complaints, or requests

Compliance

- The Program has available compliance and enforcement tools, but has not historically leveraged them
- Due to the inspection backlog, sites may be out of compliance and impede transfers or amendments



Program Staffing – High Priority Positions

POSITION	CLASS	HIRING ORDER	ORDER RATIONALE
Lead Aggregate Reclamationist (NRS4) (New Position Recommendation)	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 to reduce the Program Manager's span of control.



Fees

- The permit application fee is low and does not adequately cover the cost of services and staffing
- Renewal fees are necessarily used to support application activities, which can detract from inspections
- Increasing the application fee to more closely align with the cost of reviewing applications may produce better service
- Fees should be adjusted annually





Q&A

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