



**Build Strong™**

# Oregon Concrete & Aggregate PRODUCERS ASSOCIATION

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## 2024-2025 OFFICERS

February 17, 2025

Chairman of the Board  
**Andy Hyland**  
*HM Pacific Northwest*

Senator Jeff Golden  
900 Court St NE  
Salem, Oregon 97301

Vice Chair  
**Andrew Siegmund**  
*Allied Rock*

Dear Chair Golden,

Secretary-Treasurer  
**Ethan Hasenstein**  
*Knife River NW*

The Oregon Concrete & Aggregate Producers Association (OCAPA) opposes SB 836. Implementation of SB 836 would represent a 300% increase in fees for aggregate producers and an increase of 12 FTE to support the Department of Geology and Mineral Industries (DOGAMI) regulatory program.

Immediate Past  
Chairman  
**Dave Germer**  
*Glacier NW*

OCAPA has a long history of supporting DOGAMI, its budget and its fee increases. However, something has changed in the Department that has affected productivity all the while the legislature has increased staffing in the Department. To illustrate this point, the Mined Land Regulation and Reclamation (MLRR) program's organizational chart in 2021/2023 biennium was 12 MLRR FTE, 2023/2025 biennium was 14 MLRR FTE and proposed for the 2025/2027 biennium is 27 MLRR FTE. To further illustrate the point, in 2019 MLRR staff were processing around 8.1 applications per MLRR FTE. In 2024, MLRR staff processed 2.7 applications per MLRR FTE.

President  
**Richard L. Angstrom, Jr.**  
*OCAPA*

This is derived from DOGAMI's own data. The attached documents show the number of applications for aggregate mining operations and exploration activities submitted to the department between 2009 to 2024. The number of new applications, amendments, and transfer applications for these two categories are further separated by the number of applications received, completed, and pending. DOGAMI also provided the number of mine site inspections conducted annually and the number of staff per year to process these applications.

## BOARD OF DIRECTORS

**Scott Carlson**  
*Hooker Creek Companies*

The Findings from the DOGAMI Data Demonstrate the Loss of Productivity:

**Amanda Bewley**  
*Knife River NW*

**Brent Kerr**  
*Western Rock Resources*

**Jeff Lininger**  
*Modern Machinery*

**Molly Martin**  
*USI Insurance Services*

**Josh Nelson**  
*Glacier NW*

- Between 2009 to 2024, the department received similar numbers of applications per staff, with notable and similar high and low years pre- and post-2015.
- Even though new apps received were decreasing and the program added 3 new staff from 2019 to 2024, the number of pending applications in the queue increased during this same timeframe.
- The total number of applications received do not support DOGAMI's claims that they received more applications during COVID when compared to the increased total number of available staff.
- After 2016, mine site inspections significantly decreased and has remained below the KPM target goal for the program as the program shifted from an educational to an enforcement-based approach to achieve programmatic goals.
- Productivity for MLRR Staff dropped to 2.7 applications per FTE.

**Shane Darden**  
*Ash Grove Cement*

**Katie Jeremiah**  
*Aggregate Resources, Inc.*

**KC Klosterman**  
*RiverBend Materials*

It is OCAPA's opinion that the past addition of increased staffing has not reduced the backlog of applications. More importantly, the data does not lend itself to the notion that DOGAMI can increase staff to work their way out of the current crisis and backlog without reevaluating their permitting processes. It is also OCAPA's opinion, that the changes to the internal permitting processes and workflow processes in 2016 to 2024, combined with the loss of experienced senior level staff have likely contributed to the backlog and increased permitting timeframes.

Working with the Governor's office, DOGAMI has started the process to have a third party review the MLRR program's permitting process, and through the Governor's office we are engaged in solving this agency's permitting problems. OCAPA is not opposed to fee increases and currently has a bill on the house side to increase MLRR fees to fund current staffing levels. The OCAPA membership looks forward to working with committee to resolve the agency's inability to effectively process permits in a timely fashion.

Sincerely,



Richard Angstrom, President  
OCAPA

Attachments



Year	Exemptions/Exclusions			Relief Activities			All Permit Types						App Carryover			Site Inspections	Total MLRR Staff	Year	Number of New Applications per staff	Number of apps in the queue per staff	Number of site inspections per staff	KPM (Annual)	KPM (Biennial)	KPM Target	Major and Senior staffing changes. Does not include all of the new staffing lines
	Apps Rcvd	Apps Complete	Apps Pending	Complaints	Public Records Requests	Permit Renewals	All Apps Rcvd	All Apps Complete	App Workload	All Apps Not Issued	All Apps Queue	All Apps Stalled	All Apps Stalled	Inspections											
2009							84	57	128		44	18	7	331	9	9.3	4.9	36.8	Data Not Available						
2010							66	72	137		71	23	5	257	9	7.3	7.9	28.6	Data Not Available						
2011							55	74	120		65	22	3	684	9	6.1	7.2	76.0	Data Not Available						
2012							46	58	92		46	17	8	509	10	4.6	4.6	50.9	Completed 56% of the target						
2013							59	39	93		34	17	3	300	10	5.9	3.4	30.0	Completed 46% of the target						
2014	4	4	5				54	62	108		54	18	2	483	10	5.4	5.4	48.3	Completed 55% of the target						
2015	3	4	4				58	33	104		46	31	3	284	10	5.8	4.6	28.4	Completed 53% of the target						
2016	81	66	81				130	137	201		71	27	3	66	10	13.0	7.1	6.6	Completed 69% of the target						
2017	18	20	33				56	75	120		64	24	2	81	10	5.6	6.4	8.1	No Data						
2018	36	40	49				81	86	126		45	8	4	118	11	7.4	4.1	10.7	Completed 6.46% of the target						
2019	21	27	30				63	89	129		40	12	3	154	11	8.1	3.6	14.0	Completed 9% of the target						
2020	23	22	26				87	101	125		53	31	4	68	11	6.5	4.8	6.2	Completed 11% of the target						
2021	14	16	18				91	103	136		69	49	8	94	12	5.6	5.8	7.8	Completed 4% of the target				15%		
2022	12	12	14				65	102	140		90	45	18	44	12	4.2	7.5	3.7	Completed 7% of the target						
2023	10	8	12				25	180	1029		76	60	28	52	14	4.0	5.4	3.7	No data						
2024	9	12	13				25	167	1038		103	70	41	86	14	2.7	7.4	6.1	Completed 14% of the target						

Note: The current permit database was implemented in 2019. Prior to that time, numbers reflect a combination of old database and paper records.

MLRR Surface Mining and Exploration Annual Application Workload

Year	New Apps Rcvd		New Apps Complete		New Apps Pending		Operating Permit Applications						Exploration Permits (XP)			Total MLRR Staff	Year						
2009																		9	2009				
2010																		9	2010				
2011																		9	2011				
2012																		10	2012				
2013																		10	2013				
2014	17		23		43		6		11		22		22		22		18	33	2	5	5	10	2014
2015	20		13		40		22		5		33		12		10		10	27	0	0	0	10	2015
2016	15		16		42		13		21		41		17		28		35	35	2	2	2	10	2016
2017	10		19		36		11		19		31		11		11		16	16	4	4	4	10	2017
2018	9		16		26		8		9		20		14		12		20	20	11	6	11	11	2018
2019	11		8		21		4		8		15		26		22		35	35	4	8	9	11	2019
2020	8		6		21		14		7		21		22		17		32	32	3	3	4	11	2020
2021	8		5		23		11		5		25		19		9		33	33	10	10	11	12	2021
2022	5		6		23		9		4		29		13		13		37	37	10	4	11	12	2022
2023	9		2		26		8		3		33		11		7		36	36	17	8	24	14	2023
2024	2		4		26		12		10		42		10		11		40	40	3	7	19	14	2024