

# Water-Related Permits Process Improvement Project

*Improving the State of Oregon's Process for Permitting Development Projects that Affect Oregon's Water Resources*

February 28, 2006

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**SUBJECT: UPDATE - WATER RELATED PERMITS PROCESS IMPROVEMENT PROJECT (WRPPIT)**

## **REQUESTED ACTIONS**

**Action 1.** The Water Related Permits Process Improvement Team (WRPPIT) asks for your concurrence with the draft redesign cornerstones outlined in this document. The four cornerstones include a redesigned product, a redesigned process, concurrent process timing, and redesigned agency roles. Your concurrence with these cornerstones will allow the team to proceed with the next steps of the redesign: an assessment of statutory, rule, budgetary changes and development of change options. The team is scheduled to provide an update on its work to the Water-Related Permit Advisory Committee on March 22 and to the Legislative Audit Committee on March 30. The team appreciates the opportunity to review the progress of its work with you prior to these meetings.

**Action 2.** The Office of Regulatory Streamlining and DOGAMI have also been working with Oregon Concrete and Aggregate Producers Association to address aggregate mining aspects of the 05-07 natural resource agencies budget note. Attachment C outlines two proposed deliverables to respond to this aspect of the note:

1. review the DOGAMI operating permit process and apply appropriate multiple agency coordinate models and streamlining efforts from the WRPPIT effort, and
2. define methods that enable state natural resource agencies to speak with one voice when providing input to county requests for state comments at land use hearings regarding significant upland mining sites.

The Office of Regulatory Streamlining and DOGAMI propose that a sub-group from WRPPIT be established to do this work. The Office of Regulatory Streamlining and DOGAMI would lead the effort with a representative from ODA, ODFW, Water Resources and DSL. DEQ and DLCD would be involved as needed.

## **BACKGROUND**

The Water Related Permits Process Improvement Team (WRPPIT) last reported to you on October 26, 2005. At that time initial meetings with water-related permit stakeholders had been held, customer service trainings for 170 staff in seven agencies had been completed, and thousands of copies of a brochure describing multi-agency water-related permits had been circulated. Since October, a total of 8300 brochures have been distributed throughout the state, the SPGP implementation plan is complete and is underway, inter-agency trainings have been held and more are in the planning stage, a measurement plan has been prepared, the Natural Resources Council has requested a customer service inventory tool for Natural Resource agencies, and the Water-Related Permit Advisory Committee<sup>1</sup> and consultant stakeholder groups are engaged and supportive of WRPPIT efforts. WRPPIT will also be meeting with consultant stakeholders to review the first draft of the User's Guide in April.

Most significantly since October, the process improvement team has undertaken a redesign of the existing permit product and processes. The team started with its initial direction from you to streamline the state of Oregon's process for permitting development projects that affect Oregon's water resources by:

- reducing paperwork and duplication, increasing customer service, and improving timeliness and certainty;
- making it clearer whether and how a project can get to yes; and
- transitioning to a permit system that feels like a consolidated state permit system to applicants, instead of multiple independent applications.

The team was clear that their effort was to focus on making the process simpler and speedier, not to change the level of natural resource protections. The project was also to focus on state permits, not federal or local permits.

A first step in the redesign was to check in with a Water Related Permit Advisory Committee. The Committee was created to confirm changes in how the state authorizes activities in Oregon waterways and wetlands, to prioritize desired improvements, and provide input to the team's work so that improvements are achieved. On December 15, 2005 the Advisory Committee prioritized product and process improvements as follows:

- Improvement Priority #1: Clear Information at the Beginning
- Improvement Priority #2: Clear Authorities and Non-Conflicting Decisions
- Improvement Priority #3: Outcome/Compliance Focus
- Improvement Priority #4: Unified State Process
- Improvement Priority #5: Faster and Known Timeline
- Improvement Priority #6: Permit Cost Estimate Provided
- Improvement Priority #7: One Stop and Specialized Assistance
- Improvement Priority #8: Single Application

After touching base with you about the redesign proposal, we are planning to meet with the Advisory Committee March 22<sup>nd</sup> to obtain Committee input on the redesign. Three Advisory Committee members have participated in staff redesign meetings. Their input was invaluable as the team tried to craft a redesign that is responsive to customer concerns.

## **REDESIGN PROPOSAL AT THIS STAGE**

The team believes the redesign proposal conceived to date has promising potential to deliver on WRPPIT's original charge and the Advisory Committee's customer change priorities. Early redesign agreements among the team were to 1) focus only on projects that required a removal-fill permit and other related state authorizations, and 2) to move to a system that would result in **coordinated, consistent, concurrent, multiple decisions leading to a unified Oregon removal fill permit**. Two documents are attached to describe the team's proposed redesign from several perspectives:

Attachment A: **DRAFT CORNERSTONES OF THE REDESIGN**

Attachment B: A high level display of a **DRAFT OREGON REMOVAL FILL PERMIT PROCESS**

The team believes the proposed redesign will take significant strides in making it clear whether and how a project gets to YES and in transitioning to a consolidated state permit system.

### **NEXT STEPS IN THE REDESIGN**

Much work remains to be done, including assessing potential costs/benefits of the draft redesign, examining the feasibility/drawbacks of change options; and examining whether sufficient support exists for some or all of the ideas contained in the proposal. In particular, the team still needs to test sample applications through the redesign. An assessment of statutory and rule changes required by the proposed redesign will need to be prepared by the Department of Justice. The team will also need to identify which redesign changes could be implemented through a Memorandum of Agreement and which changes would require budget modifications. Prior to our next meeting with you, the team will also be exploring implementation scenarios to the extent possible prior to approval of specific change options.

<sup>1</sup>This Committee was established in November, 2005. Members of the Advisory Committee include:

Tim Acker, Applied Technology  
Rich Angstrom, Oregon Concrete and Aggregate Producers Association  
Chris Bayham, Association of Oregon Counties  
Amy Conners, HDR  
Steve Downs, Chair, Association of Clean Water Agencies  
Katie Fast, Farm Bureau

Frank Flynn, Perkins Coie, LLP  
Liz Frenkel, League of Women Voters  
Tom Gallagher, Legislative Advocates  
Harlan Levy, Oregon Association of Realtors  
Willie Tiffany, League of Oregon Cities  
John McDonald, Oregon Association of Conservation Districts

**ATTACHMENT A**  
**DRAFT CORNERSTONES OF THE REDESIGN**  
2-28-06

- A REDESIGNED PRODUCT
- A REDESIGNED PROCESS
- CONCURRENT PROCESS TIMING
- REDESIGNED AGENCY ROLES

Note: Cost Impact Analysis Has Not Been Completed as of 2-28-06

**1. A REDESIGNED PRODUCT →**

**Existing Product:**

**Applicants approach DSL to obtain a removal-fill permit. Projects can require as many as eighteen state reviews or authorizations.**

Often a removal-fill permit is subject to additional state permits each with their own process and timeline. Sometimes Unanticipated requirements occur after a project has started, causing delays and costly redesigns. Applicants can be left with conflicting requirements from different agency processes. Applicants and agencies are often unaware when all requirements have been met.

**Redesigned State Product:**

**One Oregon Removal-Fill Permit (ORFP) which would include the following if required:**

1. DSL Removal-Fill Requirements.
2. ODFW In-Water-Work Period Conditions.
3. ODFW Habitat Mitigation Conditions.
4. SHPO Archeological Requirements.
5. OPRD Scenic Water Way Requirements.
6. DEQ Water Quality Conditions (ONLY IF FUNDING PROVIDED).
7. DLCD Land Use Conditions.
8. A signature requiring and attaching:
  - a. ODFW In-Water Blasting Decision
  - b. ODFW Scientific Take Permit Decision
  - c. ODFW ESA Incidental Take Permit
  - d. ODFW Fish Passage Waiver/Exemption
  - e. ODFW Fish Passage Plan Decision
  - f. DOGAMI Operating Permit

The Oregon Removal-Fill Permit will also give notice when a separate authorization is required for any of the following

- DEQ 401 Water Quality Certification
- DLCD Coastal Zone Management (CZM) Federal Consistency Review
- Water Resources Department Water Use Authorization

The notice will identify requirements expected to apply when the certification/ authorization is issued, assuming the project does not change.

(Note: The 401 and CZM certifications have not been integrated into the ORFP at this time because they are part of a federal process and triggered by a federal action with a separate public review. Some of these authorizations can also take a year or more to complete. Only about 10% of removal-fill permits require a water use authorization which generally takes eight months to complete and is a property right.)

The redesigned process will also provide greater opportunity for the applicant to dialogue with appropriate state agencies in a unified setting, early on, maximizing an applicant's opportunity to design a project for least adverse impact on the environment and economy and for the benefit of the project, creating more win-win opportunities for Oregonians.

[WRPPIT To Discuss Further: 1200-c NPDES Permits (DEQ and local gov) ]

## 2. A REDESIGNED PROCESS →

<u>FEATURE</u>	<u>Existing Application Review Process:</u>	<u>Redesigned Application Review Process:</u>
A. <b>Information at the Beginning</b>	It is <b>unclear</b> what is required by whom. Only individual agency materials are currently available.	Known agency requirements will be identified at the start of the permitting process. A User Guide, continuously updated on the web and in hard copy, will <b>define to the applicant what is required and by whom</b>
B. <b>Assessment of Preliminary Design Optional</b>	DSL staff were able to provide ad-hoc reactions to design concepts presented informally by applicants.	Applicant <b>may</b> formally request an assessment of a submitted preliminary design by a state designated regulatory expert. The state designated regulatory expert will issue a written, non-binding template assessment of preliminary design, identifying all expected state natural resource requirements related to the project.
C. <b>Pre-Application Multi-Agency Team Meeting Optional</b>	Project proponent requests a meeting with applicant, DSL & other appropriate agencies to provide input to a project proposal. Agencies are not required to attend.	Applicant <b>may</b> request a multi-agency team meeting if appropriate. Agencies must attend. Agencies are to identify project issues and suggestions. State to provide written meeting summary that is non-binding and non-appealable.
D. <b>Number of Applications</b>	Applicants fill out <b>many applications</b> and provide supporting and often redundant materials for each authorization.	Applicants will be asked to complete a <b>single application</b> which will require only information pertinent to his or her permit. Early on this application will be integrated for major items with separate applications attached for less frequent elements.
E. <b>Complete Application</b>	Each agency applies <b>separate and often unclear application completion requirements</b> , standards and processes.	A <b>single trained staff person is responsible for determining application completeness</b> . Each agency supplies a checklist of application requirements. Application “completion” is separated from “technical adequacy”.
F. <b>Public Review</b>	Each agency has its own public review process for its own authorizations creating <b>multiple public review processes for the same project</b> .	<b>There is one consolidated public review process for an Oregon Removal-Fill Permit for a single project</b> . This review is concurrent with the state review to inform state agencies about the project. This eliminates multiple, partial public reviews of the project and provides the public the benefit of a comprehensive state evaluation of the project.
G. <b>Agency Review</b>	Each agency individually and independently reviews each application.	A multi-agency team, appropriate for each application, conducts a one-time or virtual review of applications working together to dialogue and evaluate the application, problem-solving multi--agency issues as appropriate .
H. <b>Agency Decisions</b>	Each agency applies its own requirements that some applicants experience as <b>unclear and conflicting It isn't clear</b> to applicants and to agencies which agency to listen to.	It is clear which agency has authority to make which decisions. Agencies resolve potential conflicts in permit requirements in the single Oregon Removal Fill permit decision. (Please see redesigned cornerstones 1 and 4)

## 3. CONCURRENT PROCESS TIMING →

**Existing Process Timing:**

Application and state processes are **not coordinated**, and have **multiple, sequential timelines**. Applicants complain of project delays and added costs due to multiple and unanticipated state agency requirements. Applicants can be left with conflicting requirements from different agency processes. Applicants and agencies can also be unaware when all requirements have been met. The overall timeframe to obtain all authorizations is not really known.

**Redesigned Process Timing:**

Authorizations will be managed in **one consolidated, concurrent process** (except water use authorizations, and 401/CZM certifications. Anticipated conditions for these later authorizations will be identified in the ORFP.) The total time to obtain state authorizations is like to be shorter due to concurrent versus sequential processing. The upfront opportunity for applicants to consider all state requirements early and to receive the results of all permit conditions at one time should also eliminate changes, delays and costs experienced by some applicants.

**4. REDESIGNED AGENCY ROLES →**

<b>A.</b>	<b><u>FEATURE</u></b>	<b><u>Existing:</u></b>
	<b>Process Owner</b>	<p>A process owner is the primary person or group responsible for the performance of a process, the internal resources used in the process, the satisfaction of the customer who uses the product, and the satisfaction of stakeholders who care about the product.</p> <p>The concept of a process owner is not consistently understood or applied in the various water-related permit processes today.</p> <p><b>In addition, multiple processes with multiple owners and multiple products also exist today.</b></p>

**Redesigned:**

All of the state processes would be consolidated into or connected to one process, the Oregon Removal-Fill Permit (ORFP) process. Through a Memorandum of Agreement the roles of the agencies involved in this permit would be defined. **In general, there would be a lead state product/process owner, and all other agencies would work collaboratively with the owner to continuously improve the state process and product to satisfy customers and stakeholders.** The MOA would also describe the goals of the redesigned process; clarify authorities, timelines, expectations, and responsibilities; and provide for an issue escalation process.

**The team recommends that the owner of the redesigned state process and product be one agency and that the agency be DSL.** The team makes this recommendation for the following reasons:

1. This will allow the Legislature to look to a single agency for accountability regarding product and process.
2. The DSL removal-fill permit is the single constant in this permit process. Therefore we recommend that DSL should be the lead product and process owner, involving other agency authorizations as needed.



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<b>B.</b>	<b>Agency Role in the Developing the Permit</b>	<b>DSL currently asks state agencies to comment on applications</b> just as DSL asks the public to comment on applications. Agencies don't always respond. In addition, a mechanism for DSL to provide feedback regarding the ultimate use of their comments is lacking.	<b>State agencies become partners in developing the Oregon Removal Permit</b> , rather than respondents to another agency's process. The redesigned process provides a systematic way to bring agencies together to develop the ultimate permit. Participation would not be optional.
<b>C.</b>	<b>Consolidated Product Focus</b>	<b>Agencies today focus on delivering individual authorizations</b> as required by statute and rule.	<b>Agencies will collectively focus on delivering the Oregon Removal-Fill Permit</b> and providing their contribution in a timely, collaborative and effective way either as part of or connected to the permit.

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**ATTACHMENT B**  
**Draft Oregon Removal-Fill Permit Process**  
 2-17-06

Note: Steps 1 – 8 today are solely focused on DSL information. In the redesigned process they are multi-agency focused, providing information and consultation regarding all natural resource agency requirements -- in effect creating a new front end process.


	Applicant Or Applicant's Consultant	State Of Oregon	Interested Parties	Early Notes
<b>POSSIBLE APPLICANT ON RAMP</b>		Step 1. Provide permit guidance materials		<i>Provide written material and on-line information about the Oregon Removal-Fill permit, the steps and timing involved, what is required of applicants, and how to meet state requirements. Provide information regarding best management practices, design considerations, how to reduce impacts, how to qualify for a general authorization, and potential streamlined permit options.</i>
		Step 2. Obtain permit guidance materials <b>Optional</b>		
<b>POSSIBLE APPLICANT ON RAMP</b>		Step 3. Request assessment of preliminary design <b>Optional</b>		<i>NEW. Applicants general description of proposed project. Given to a state designated regulatory expert.</i>
<b>POSSIBLE APPLICANT ON RAMP</b>		Step 4. State designated regulatory expert provides written, non-binding template assessment of preliminary design if requested. <b>Optional</b>		<i>Provide direction about how to meet state requirements and offer design considerations. State designated regulatory expert lets other state people know of project as appropriate.</i>  <i>ISSUE If a new requirement or concern is raised later in the process, for example water rights or land use, it just becomes new information at that time. This information from the state is non-binding and not appealable.</i>   <i>Charge Pre-Application/Design Assessment Fee?</i>
		Step 5. Draft project proposal <b>Optional</b>		<i>Template?</i>
	Step 6. Request multi-agency TEAM meeting – <b>Optional</b>			.
	Step 7. Multi-agency TEAM review meeting if requested and appropriate	Step 7. Multi-agency TEAM review meeting if requested and appropriate		<i>Note: involves interagency notice, is not a public meeting, applicant invites who they wish</i>  <i>Non-binding. and not appealable.</i>  <i>Track issues in step 3 for consistency</i>   <i>Charge Pre-Application/Design Assessment Fee?</i>



**POSSIBLE APPLICANT ON RAMP**

Notice: Steps can repeat if application needs more information.

	Step 8. Provide written summary of multi-agency TEAM review meeting		
Step 9. Submit Application			<i>Application includes information required for all elements of the Oregon Removal-Fill permit identified in Step 18 below. If application is incomplete applicant will be referred to above steps and/or provided assistance as appropriate.</i>
	Step 10. Acknowledge receipt of application to applicant.		
	Step 11. Determine whether application is complete via check list.		<i>If something is missed, pick up in technical review, e.g. – fish passage. Note: change from DSL current practice. Provide notice of Redesigned Product B items at this point if appropriate.</i>
	Step 12. Post application triggering public review process.		
	Step 14. Conduct multi-agency TEAM review to determine if project meets state standards and what conditions are required.	Step 13. Public comment with a deadline.	
	Step 15. Communicate results of state and public review to applicant.		
Step 16. Modify application in response to state and public review if necessary			
		Step 17. If major project changes public review again.	
Step 18. If major project changes return to step 2, 3, 5 or 9.			

	Step 20. Provide Draft Permit Decision to Applicant		See details in step 22 below
Step 21. Review Draft Permit Decision. Contact state if needed.			
	Step 22. Issue Oregon Removal-Fill Permit Decision		<p><b>An Oregon Removal-Fill Permit will include the following if required:</b></p> <ol style="list-style-type: none"> <li>1. DSL Removal-Fill Requirements</li> <li>2. ODFW In-Water-Work Period Conditions.</li> <li>3. ODFW Habitat Mitigation Conditions.</li> <li>4. SHPO Archeological Requirements.</li> <li>5. OPRD Scenic Water Way Requirements.</li> <li>6. DEQ Water Quality Conditions. (ONLY IF FUNDING PROVIDED).</li> <li>7. DLCD Land Use Conditions.</li> </ol> <p><i>[Note: 1-7 are within authority of multi-agency team]</i></p> <p><b>8. A signature requiring and attaching an:</b></p> <ol style="list-style-type: none"> <li>a. ODFW In Water Blasting Decision</li> <li>b. ODFW Scientific Take Permit Decisions</li> <li>c. ODFW ESA Incidental Take Permit</li> <li>d. ODFW Fish Passage Waiver/Exemption</li> <li>e. ODFW Fish Passage Plan Decision</li> <li>f. DOGAMI Operating Permit</li> </ol> <p><i>[Note: a-f are not within authority of multi-agency team]</i></p> <p>The Oregon Removal-Fill Permit will also give notice when a separate authorization is required for any of the following:</p> <ul style="list-style-type: none"> <li>▪ DEQ 401 Water Quality Certification</li> <li>▪ DLCD Coastal Zone Management Consistency Certification</li> <li>▪ Water Resources Department Water Use Authorization</li> </ul> <p>The notice will identify requirements expected to apply when the certification/authorization is issued, assuming the project does not change.</p> <p><u>Discuss Further:</u> → 1200-c NPDES Permits (DEQ and local gov)</p> <p> <i>Oregon Removal-Fill Permit can offer one or more of 3 choices:</i></p> <ol style="list-style-type: none"> <li>1) <i>Approved Permit with a checklist of conditions. If an item is checked the authorization is required and conditions are enumerated.. If not checked, will not be required.</i></li> <li>2) <i>Not a permitted activity (denial)</i></li> <li>3) <i>Consult with another agency (see item 10 above.)</i></li> </ol>
Step 23. Appeal		Step 23. Appeal	Applicant or 3 <sup>rd</sup> party has opportunity to appeal.
Step 24. Implement Project.			
	Step 25. Monitor		

**PERMIT OUTCOME: Preserved Natural Resources & Productive Economy**

(Note – this has been and continues to be the goal of the permit.)

**ATTACHMENT C**  
**DOGAMI RELATED DELIVERABLES FOR 05-07 BUDGET NOTE**  
2-28-06

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**Budget Note Response**

The Budget Note to the natural resources agencies set the expectation for the named agencies to: “... *work with the Office of Regulatory Streamlining on one or more projects to streamline the delivery of water-related permitting programs and projects including water-related permitting associated with... aggregate mining activities.*” The following plan reflects the Department of Geology and Mineral Industries’ (DOGAMI) commitment to respond to the budget note. DOGAMI receives very high customer satisfaction ratings (98%) in it’s annual customer survey feedback, the agency strives to continuously improve their business practices and customer service. The DOGAMI response to the budget note does not reflect a broken process but ongoing work of continuous improvement. One systemic area of work ready for action is greater integration and coordination of state requirements affecting applicants.

**Current State Regulation of the Aggregate Industry**

Currently there are typically multiple permits required in conjunction with the DOGAMI Operating Permit (DOP). These may involve DEQ 1200A General Storm Water Quality Certification (already delegated to DOGAMI by MOU with DEQ) permitting for air quality at the state and local levels, local noise ordinances, traffic impact requirements, etc. Other natural resources comments, permits or reviews may be required such as Water Resources Department groundwater regulations and Water Rights determinations, DLCD’s Coastal Zone Reviews, ODFW’s comments regarding fish/wildlife habitat and applicable Fish Passage Plans. Also, several of these agencies are involved in ongoing monitoring and compliance reviews related to active DOPs.

In addition the State of Oregon comments on applications that inform the local land use decision process. These comments can be highly technical, confusing, inconsistent or even conflicting in nature and is an additional area of concern to customers. Because of the complex and specialized nature of these regulations, permits, authorizations, comments and reviews it becomes paramount to find better ways to coordinate the processes and requirements with the state to speaking at hearings with one consistent, clear voice while maintaining the appropriate natural resources protections.

**Work Underway**

DOGAMI is involved in the Water-Related Permitting Process Improvement (WRPPIT) effort with six other natural resources agencies as they work to redesign the collection of permitting, review, commenting and authorizations associated with the Removal/Fill requirements for development and restoration activities in or near Oregon’s wetlands and waterways. It is expected that the redesigned coordination model for the WRPPIT work will be complete in March of 2006.

While DOGAMI is involved in less than 10% of the Removal/Fill authorizations in the state, DOGAMI is engaged with the Water-Related Permits Process Improvement efforts as a way to collaborate with other agencies to improve Oregon’s overall natural resources business regulatory climate. The WRPPIT redesigned coordination model is expected to serve as the foundation for the coordination and integration issues related to the DOP discussed above. The work on the state coordination and integration related to the DOPs is expected to begin at the completion of the WRPPIT model development in March 2006 and the model design to be completed for the DOPs by September 2006.

The Budget Note should not address: OCAPA has emphasized that the response to the DOGAMI aspect of the budget note should not involve issues that are the focus of the **2004-05 Aggregate Mining/Farmland Protection Consensus Process** convened by the Portland State Oregon Consensus Program at the request of the Governor. “The purpose of the **Consensus Process** is to develop a recommended policy for the state in regard to siting and regulating aggregate mines on farmlands, within the context of the long-term demand for aggregate and the availability of other aggregate resources. Considerable data has been compiled and presented to the group regarding aggregate mining and farmland issues by the Institute for Natural Resources

at Oregon State University. The Consensus Group met seven times in 2004, and agreed to continue working together to develop consensus recommendations and agreed to not request the 2005 Legislature to address any related individual issues. The Consensus Process will resume following the Legislative Session. The group is looking at various options to address the issues that have been identified.” (Source: Oregon Consensus Program Website)

### **DOGAMI Related Deliverables for the Budget Note**

WRPPIT’s efforts involve all of the natural resource agencies that regulate the aggregate industry and are expected to continue with any legislative changes considered by the 2007 legislature with implementation expected through 2008. Because significant effort is underway with the WRPPIT process to streamline how natural resource agencies work together to authorize Removal/Fill permitting work in Oregon’s waterways and wetlands, OCAPA and DOGAMI believes this streamlining effort should provide the foundation for concurrent and subsequent efforts to streamline state regulation of sand and gravel mining in Oregon. The Office of Regulatory Streamlining and DOGAMI will apply the approaches of the WRPPIT process improvement efforts to coordinate state regulation of the aggregate industry beginning in April 2006 and expect to complete the model design by September 2006 for the permitting and review issues as well as the state’s land use commenting process.

- a. Propose changes to make the permitting and enforcement processes faster and cheaper for the state and for the aggregate industry, while maintaining state protection standards include:
  - i. Applying WRPPIT changes to DOGAMI operating permits.
    1. Reduce/combine permits
    2. Lead concurrent, integrated state requirements for DOPs
    3. Eliminate redundant internal reviews
    4. Safe harbor language
- b. Propose changes to the State’s Input at Local Land Use Hearings Regarding Significant Upland Mining Sites.
  - ii. Using the coordination model developed by WRPPIT to produce a consolidated and non-conflicting state response to county requests for state comments at land use hearings regarding significant upland mining sites.

### **Summary**

While Oregon’s natural resource regulations require a variety of permits, reviews and commenting activities, DOGAMI and the involved agencies will use the WRPPIT redesign model as a foundation for integrating the requirements of the DOPs and state comments for local land use hearings related to DOP applications. This will not only result in appropriate natural resources protection standards remaining unchanged but also will result in a coordinated, integrated, consistent and more timely state response to DOP applicants.