KNIFE RIVER CORPORATION
AN MDU RESOURCES COMPANY

www.kniferiver.com

Knife River Corporation – Mountain West
Southern Idaho Division
5450 West Gowen Road
Boise, ID 83709

September 8, 2026

Aislinn Johns
Idaho Department of Environmental Quality
1410 N. Hilton Street
Boise, ID 83706

**Re: Support for Docket No. 58-0101-2601 - General Minor Permits**

Dear Ms. Johns:

On behalf of Knife River, I strongly support the Board of Environmental Quality's adoption of Docket No. 58-0101-2601 as proposed and DEQ's timely implementation of the General Minor Permit framework. Knife River is a contractor engaged in highway, heavy civil, utility, and public works construction. Our projects regularly rely on portable hot-mix asphalt plants and concrete batch plants. Based on our experience, the proposed rule represents a practical way to improve Idaho's permitting system while preserving the environmental standards that contractors and the public expect.

The framework recognizes that certain non-major facilities have similar equipment, emissions, operating practices, and regulatory requirements. DEQ could establish consistent permit conditions for eligible facility categories rather than repeat the same technical review for each application. Once a permit is established, the Department would approve or deny a qualifying request for coverage within 15 days of receiving the application and fee.

This approach would provide a significant practical benefit to contractors. Idaho's existing Permit to Construct process involves extensive engineering analysis and processing time, which can complicate coordination of project schedules, material production, labor, equipment, and public infrastructure funding. For eligible facilities, a standardized pathway would improve predictability and reduce unnecessary delay without limiting DEQ's authority to determine whether an individual applicant qualifies for coverage.

We also support the environmental safeguards included in the proposal. General Minor Permits would be limited to eligible nonmajor source categories outside designated nonattainment areas. DEQ would conduct the necessary technical evaluation when developing each permit, including establishing emission limitations, operating conditions, monitoring provisions, and recordkeeping requirements. Proposed and modified permits would be subject to public comment, and covered facilities would remain responsible for complying with applicable local, state, and federal requirements.

The framework also gives DEQ a practical way to update permit conditions as technology, operating practices, and regulatory requirements change. Each proposed or revised permit would remain subject

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to public review, and DEQ could consider additional facility categories where consistent permitting would provide similar benefits.

Portable hot-mix asphalt plants and concrete batch plants are strong candidates for the first permits developed under this rule. More predictable permitting for these facilities would help contractors and public agencies maintain schedules, use infrastructure funding efficiently, and deliver safe, cost-effective public projects on time.

For these reasons, Knife River supports adoption of Docket No. 58-0101-2601 and timely development of General Minor Permits for eligible portable hot-mix asphalt plants and concrete batch plants. We would welcome the opportunity to share our practical experience as DEQ develops the initial permits.

Sincerely,

Joseph Smith

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