Idaho Association of Commerce & Industry

Employers Advocating Economic Opportunity in Idaho®

October 1, 2026

Aislinn Johns
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706

Dear Aislinn:

The Idaho Association of Commerce and Industry (IACI) is the leading voice for business in the State of Idaho. The Department of Environmental Quality (Department) has proposed a general minor permit rule to streamline the permitting process for eligible source categories by issuing a standardized general minor permit (Docket No. 58-0101-26010).

Many IACI members are required to obtain air quality construction (permit to construct) permits. Having a general minor permit for certain air emission source categories is of significant interest to our members. IACI submitted comments to the Department in April 2026 in support of developing a rule to streamlining the permitting process for certain emission source categories. Thus, this rulemaking is of direct interest to IACI and its members; we offer the following comments on this rulemaking.

As stated in our April 2026 comments, IACI supports the use of general permits and permits by rule to improve the processes for minor new source review for source categories. The reasons for that support are as follows:

- At times, the Idaho minor source review program is overwhelmed with applications and is understaffed. This results in significant process delays.
- These delays can extend for many months, resulting in project postponement and uncertainty for business owners and operators.
- A common aspect of the permitting delays for minor permit applications is the ambient air quality analysis (typically done through ambient air quality modeling).

An example of the utilization of a general minor permit would be for activities associated with maintaining and improving Idaho's transportation sector. Having a general minor permit for portable hot-mix asphalt plants and concrete batch plants would reduce significantly the time associated with obtaining an air permit while assuring compliance with Idaho's air quality standards. Also, obtaining timely air quality permits is important because of Idaho's climate; often transportation work is seasonal; therefore, there is often just a limited "season" for such work to occur.

Finally, IACI and its members look forward to identifying additional source categories for which a minor source general permit would be appropriate, including for certain minor source emissions units and activities located at major sources.

We appreciate the Department's consideration of these comments. Please contact me if you have any questions about these comments or wish to discuss them further with us.

Sincerely,



Alex LaBeau
President

C: Alan Prouty Chair, Environment Committee