CONTRACTORS, INC

A CRH COMPANY

September 22, 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 HK Contractors, Inc., I am writing in support of the Idaho Department of Environmental Quality's proposed rule, Docket No. 58-0101-2601, establishing a process for the development and issuance of General Minor Permits.

HK Contractors, Inc. has provided aggregates, asphalt, paving and construction services to public and private clients throughout Idaho for the last 50 years. Our work regularly depends on portable hot-mix asphalt plants and concrete batch plants to deliver road, bridge, utility, and other public infrastructure projects.

For our company, permitting certainty is essential to effective project planning. A delay in approving a portable plant can affect project bidding, equipment mobilization, employee scheduling, material production, trucking, and coordination with the project owner. Although these facilities often use substantially similar equipment and operating processes from one location to another, the existing Permit to Construct process has taken as long as a year.

The proposed General Minor Permit process would provide more predictability. Fifteen days to permit-completion would significantly improve our ability to provide essential services. Moving from an uncertain process measured in months to a defined process measured in weeks would help contractors schedule work more confidently and reduce the risk of idle equipment, repeated mobilization, missed construction windows, and other avoidable expenses.

Those savings would also benefit the public agencies that rely on contractors to deliver Idaho's transportation infrastructure. Permitting delays can increase project costs, require additional contingencies in contractor pricing, and make it more difficult for the Idaho Transportation Department, cities, counties, and highway districts to complete projects on schedule. A faster and more predictable process will help those agencies use public dollars more efficiently.

Importantly, the proposed rule would not reduce Idaho's air quality protections. DEQ would establish the applicable technical requirements, emission limitations, monitoring provisions, and recordkeeping obligations when developing each General Minor Permit, and individual facilities would remain responsible for meeting all applicable requirements.

For these reasons, HK Contractors, Inc. respectfully urges the Board of Environmental Quality to

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adopt Docket No. 58-0101-2601 as proposed. Following legislative approval, we also encourage DEQ to move promptly to develop General Minor Permits for portable hot-mix asphalt plants and concrete batch plants.

Thank you for the opportunity to comment.
Sincerely,



Tim Beach
Environmental Specialist
HK Contractors, Inc.