



June 5, 2024

via email: mary.anne.nelson@deq.idaho.gov

Ms. Mary Anne Nelson, Surface Water and Wastewater Division Administrator
Idaho Department of Environmental Quality
1410 N. Hilton St.
Boise, ID 837106

Subject: Negotiated Rulemaking in Compliance with Executive Order No. 2020-01,
Zero-Based Regulation of rules 58.01.14 Rules Governing Fees for
Environmental Operating Permits, Licenses, and Inspection Services - 5/22/2024
Stakeholder Meeting

Dear Ms. Nelson:

The Idaho Rural Water Association (IRWA) is a 501(c)3 non-profit corporation originally formed in 1987 to provide training and technical assistance to public drinking water and public sewer utilities in Idaho that serve communities of less than 10,000 people. Due to the rural nature of our state, IRWA serves more than 90 percent of public drinking water and wastewater utilities in Idaho. Our Association is currently comprised of over 365 of Idaho's drinking water and wastewater utilities and is governed by a seven-member board of directors that volunteer their time. Directors are elected from IRWA's member utilities.

Our member utilities have the very important public responsibility of complying with all applicable state water and environmental regulations and supplying the public with safe drinking water and sanitation every second of every day. Rural and small communities work to ensure access to quality drinking water, provide wastewater treatment services, and protect their local environment.

We appreciate the opportunity to comment on behalf of our members for the Idaho Department of Environmental Quality (DEQ) negotiated rulemaking for the "Zero-Based Rule Making" environmental fee rules 58.01.14. While we were unaware of the initial negotiated rule making on April 17, 2024, we reviewed the meeting material provided and participated in the follow-up meeting held May 22, 2024. We found the 'Reuse Permit Fees – Rationale and Proposal' particularly helpful to aid in understanding the importance of implementing annual fees.

In light of the information provided and after consideration of the discussion during the May 22, 2024, negotiated rule making, IRWA supports DEQ's Negotiated Rule Draft No. 2 as posted on May 15, 2024. We appreciate the opportunity to comment and participate in the public and stakeholder input to the process.

Respectfully,



AJ Gray
Co-Legislative Director



Pete Stayton
Co-Legislative Director