April 24, 2025

via email: diane.cutler@deq.idaho.gov

Ms. Diane Cutler
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706

Subject: Docket No. 58-0112-2501 Rulemaking in Compliance with Executive Order No. 2020-01, Zero-Based Regulation - 4/17/2025 Stakeholder Meeting

Dear Ms. Cutler:

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 Department of Environmental Quality's (DEQ) rulemaking for the "Zero-Based Rule Making" Docket No. 58-0112-2501. We were unable to attend the initial negotiated rule making meeting held on April 17, 2025, however, we have reviewed the draft rules posted on the Idaho DEQ Rulemaking website.

6395 W. Gowen Road ▪ Boise, ID 83709
(208) 343-7001 ▪ Fax (208) 343-1866
www.idrwa.org

We appreciate DEQ's efforts to clarify the term "Disadvantaged Community" and "Affordability" in the proposed rule. The introduction of the tiered approach to determine disadvantaged communities based upon affordability is viewed as an improvement to better align loan modifications with those communities most in need.

Thank you for the opportunity to comment and participate in the public and stakeholder input process.

Respectfully,

Shelley Roberts

Shelley Roberts
Chief Executive Officer
Idaho Rural Water Association

cc: MaryAnna Peavey, IDEQ
AJ Gray, IRWA Co-legislative Director
Pete Stayton, IRWA Co-legislative Director

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