



North Kootenai Water & Sewer District

13649 N Meyer Rd., Rathdrum ID 83858
Phone: (208) 687-6593 Fax: (208) 687-6597
www.nkwsd.com

July 30, 2025

Tyler Fortunati
Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706

RE: General Rule Making – IDAPA 58.01.08, Rule 552.01.b.v.

Dear Mr. Fortunati,

North Kootenai Water and Sewer District is writing to respectfully request that the July 1, 2024 modifications to IDAPA 58.01.08, rule 552.01.b.v. be restored to the previous language. The previous language provided public water systems the appropriate amount of flexibility and balance in managing system pressures and ensuring that property owners received adequate water service through the plumbing code.

Specifically, we request that the current sentence *“Any newly constructed PWSs, or portions of existing systems that are materially modified after July 1, 2024, must keep static pressure within the distribution system below eighty (80) psi. Pressures above eighty (80) psi must be controlled by pressure reducing valve stations installed in the distribution main.”* Be removed and the previous language *“Any public water system shall keep static pressure within the distribution system below one hundred (100) psi and should ordinarily keep static pressure below eighty (80) psi. Pressures above one hundred (100) psi shall be controlled by pressure reducing valve stations installed in the distribution main”* be reinstated.

The modification to IDAPA stems from our past year of experience with the change and our observed operation considerations that we would like to share:

1. The current minimum 40 psi to 80 psi maximum pressures create only a 40 psi differential or less than 100 feet elevation before requiring PRV system installation, which greatly limits the operation flexibility of public water systems.
2. The Idaho State Plumbing Code, section 608.2 (Excessive Water Pressure), currently offers an effective framework for managing pressure at individual properties, enabling property owners to customize pressures based on their specific requirements.
3. On existing distribution networks, the requirement to reduce pressure affects commercial fire sprinkler systems that were originally engineered based on established system pressures. In

some instances, pressure modifications have impacted building fire suppression system performance.

4. The timing of when a development begins and completes can take several years. In the current instance, we are asking a developer to install PRV systems on infrastructure they have already paid for which creates hardship.
5. From a customer perspective, we seldom get a complaint for high pressure or the need for an individual to install a residential PRV. Pressure-related complaints are typically for lower pressures. The rule change increases the likelihood of public water systems receiving complaints over lower pressures.

North Kootenai Water & Sewer District owns and operates 15 water systems in Kootenai County, making it the third largest water purveyor in the area. Among these 15 systems, five face significant challenges due to drastic elevation changes. The proposed revisions would make it impossible to maintain adequate pressure for delivering safe, quality drinking water throughout each system. The District believes that pressure should be regulated within the plumbing systems of the end-users.

We would appreciate the opportunity to explore how we might work together to find an approach that addresses both regulatory objectives and operational considerations while ensuring continued safe and reliable water service.

I would welcome the chance to discuss this matter further at your convenience.

Sincerely,



Paul Tucker
District Manager