



CITY OF KUNA
751 W. 4th St
KUNA, ID 83634
www.kunacity.id.gov

Adam Wenger
Public Works Director
208.287.1727

Memorandum

TO: Tyler Fortunati
Idaho Department of Environmental Quality
FROM: Adam Wenger | Public Works Director
City of Kuna
RE: Written comment for Drinking Water: Docket No. 58-0108-2502
DATE: 7 August 2025

Good afternoon,

The highlighted statement below contains conflicting scenarios; one describes increased pressure and the other details actions that decrease pressures:

Table with 2 columns: Proposed (Based on old language) and 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.

Proposed change to language would strike out the portion of statement as below:

| | |
|---|---|
| Proposed (Based on old 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. In areas where failure of installed pressure reducing valve stations would result in extremely high pressure, pressure relief valves may be required. The Department may approve the use of pressure reducing devices at individual service connections on a case-by-case basis, if it can be demonstrated that higher pressures in portions of the distribution system are required for efficient system operation. If system modification will cause pressure to routinely exceed eighty (80) psi , or if a check valve or an individual pressure reducing device is added to the service line , the water system owner shall notify affected customers. Notification may include reasons for the elevated pressure, problems or damage that elevated pressure can inflict on appliances or plumbing systems, and suggested procedures or mitigation efforts affected property owners may initiate to minimize problems or damage. |
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The statement regarding water system owner’s obligation to notify users of mitigation options would be an appropriate area to mention individual service pressure reducing valves, if explicitly desired. As is currently written this sentence carries adequate implication for such a solution.

If the intent of the statement recommended for removal was to protect potential new users who otherwise could be unaware of individual service pressure reducing valves, the obligation of notification should be on the developer or seller of the affected property rather than the water system owner. Overwhelmingly, service-level PRVs are installed downstream of the typical point of public/private delineation (water meter) and therefore should be a disclosure between private parties involved in the transaction.

Thank you for your consideration of these changes to the proposed language.



751 W. 4th St
P.O. Box 13
Kuna, ID 83634

Adam Wenger
Director
City of Kuna | Public Works
Phone: 208.287.1727
Email: awenger@kunaid.gov
www.kunacity.id.gov