From:	Jordan Crane
To:	Tyler Fortunati
Cc:	James Bledsoe; Jim Mullen; Bryan Phinney; Michael Schulz; Trenton Buster
Subject:	Public Comment to Proposed Rule Change to IDAPA 58.01.08.552.01.b.v
Date:	Tuesday, July 29, 2025 3:25:50 PM
Attachments:	image001.jpg

Tyler:

Please accept this as an official public comment to the above reference proposed rule change:

My name is Jordan Crane, and I am a licensed professional civil engineer employed by Keller Associates, Inc., a consulting firm headquartered in Meridian, ID. Keller Associates completes water system planning and design for numerous communities throughout Idaho. On behalf of Keller Associates, Inc., I am submitting this comment in support of the proposed rule change to IDAPA 58.01.08.552.01.b.v, which would allow up to 100 psi of static pressure in a public water system's distribution system.

The existing requirement—limiting maximum static pressure to 80 psi—is not always practical or efficient for the operation of certain public water systems. We offer two real-world examples to illustrate this:

1. Some public water systems have portions of larger pressure zones (areas of the distribution system with the relatively same hydraulic grade) that naturally experience pressures over 80 psi. To comply with the current code, the public water systems would need to either install numerous pressure reducing valves (PRVs) on mainlines, or reduce each pump's setpoint that pumps into that pressure zone. Both options are costly and carry operational drawbacks:
    a. Installing multiple PRVs can reduce system looping and limit available fire flow and system redundancy.
    b. Lowering pump setpoints can reduce pumping efficiency, increasing energy costs.
    c. Both options lower static pressures which will reduce historically available fire flows. Facilities with fire suppression sprinkler systems are designed to existing system pressures; lowering system pressures could compromise existing fire sprinkler systems.
2. In mountainous or hilly regions, maintaining pressures below 100 psi throughout the system is often impractical. Higher pressures are sometimes necessary to serve areas of higher elevation effectively. Designing a system to reduce pressure and then re-pump to higher elevations is inefficient and cost-prohibitive.

In conclusion, we support the proposed code change as it will allow public water systems greater design and operational flexibility, avoid unnecessary costs, and helps preserve fire flow capacity and system efficiency.

Thank you for the opportunity to provide input.

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