



October 22, 2025

Idaho Department of Environmental Quality  
Attn: Tyler Fortunati  
1410 N. Hilton St.  
Boise, ID 83706

Subject: Comments on Proposed Rule Change to IDAPA 58.01.08.552 — Maximum Public Water System Distribution Pressure

Dear Mr. Fortunati:

The Idaho Rural Water Association (IRWA) is a 501(c)(3) non-profit organization established in 1987 to provide training and technical assistance to public drinking water and wastewater utilities across Idaho, particularly those serving fewer than 10,000 residents. IRWA also advocates on behalf of more than 375 member utilities to ensure that rural and small communities have a strong voice in policy discussions.

We appreciate the Idaho Department of Environmental Quality's (IDEQ) responsiveness to stakeholder concerns regarding the July 1, 2024, rule establishing an 80 psi maximum distribution system pressure limit. The proposed changes address the unintended impacts of that rule. Restoring the previous language offers needed flexibility for utilities to manage distribution pressures effectively while continuing to provide adequate service to property owners.

IRWA supports IDEQ's proposed rule changes to IDAPA 58.01.08.552, as published in the Governor's Office of Administrative Rules Coordinator Bulletin, Volume 20-10 (October 1, 2025). We appreciate the opportunity to comment and stand ready to assist or collaborate further as the rulemaking process advances.

Respectfully,

Shelley Roberts  
Chief Executive Officer  
Idaho Rural Water Association