



Mayor Robert E. Simison

City Council Members:

Luke Cavener, President
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Brian Whitlock
Doug Taylor
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Anne Little Roberts

October 20, 2025
Tyler Fortunati
Idaho Department of Environmental Quality
1410 N Hilton
Boise, ID 83706

Mr. Fortunati;

The City of Meridian has reviewed the draft of proposed modifications to IDAPA 58.01.08, rule 552.01.b.v., regarding static pressure within the distribution system that was posted on October 1, 2025. We appreciate that IDEQ is soliciting additional input for this proposed change. We wish to express several concerns and provide proposed language for IDEQ's consideration.

First, we are concerned that, as noted in our July comments, the new draft language appears to be a substantive change as well as a more stringent and restrictive change from the rule prior to July 2024.

We are concerned with the potential for future interpretation of "at service connections" if it is not defined in the rule change. We understand from a recent conversation with DEQ that the term would apply to any location from the service tap of the main to the structure being served. We are concerned with the idea that the rules must be interpreted outside of the plain meaning of the language because of the potential that future DEQ staff may interpret it differently.

Additionally, pressure at buildings is already regulated by Idaho plumbing code. Restricting pressure to 80 psi in the PWS will significantly increase the cost of water system operation without materially improving system safety or customer satisfaction and potentially harming safety, particularly for fire sprinkler design.

We propose the following draft language for your consideration. We believe this language would address our concerns. We propose that this language replace the existing and proposed 552.1.b.v (1), (2), and (3).

v. Any new or substantially modified PWS area should ordinarily maintain a maximum pressure of 100 psi, where it is feasible to meet the pressure requirements as part of the material modification, measured prior to the structure, facility, or premise which is connected to the PWS water source, and which is or may be used for domestic purposes (service connections).

(1) Pressures above 100 psi at service connections must be controlled by pressure reducing valves installed in the distribution system (preferred) or at individual service connections.


(2) If static pressure at a service connection exceeds 100psi the Department may approve the use of pressure reducing devices for individual service connections on a case-by-case basis.

(3) If PWS modifications will cause pressure to routinely exceed 80 psi the PWS owner must notify affected customers. Notification may include reasons for the

elevated pressure, problems or damage that unmitigated elevated pressure can inflict on appliances or plumbing systems, and procedures or mitigation efforts affected property owners may initiate to minimize problems or damage.

If the above language is not acceptable, we would prefer the Department revert back to the language that was in rule prior to July 1, 2024 rather than adopting the current, more restrictive and problematic proposed version.

Sincerely,



Laurelei McVey
Public Works Director