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**Sent:** Thursday, April 16, 2026 3:05 PM  
**To:** Tyler Fortunati <[Tyler.Fortunati@deq.idaho.gov](mailto:Tyler.Fortunati@deq.idaho.gov)>  
**Cc:** POELSTRA, GLEN < >  
**Subject:** Comments for Drinking Water Fees

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I believe DEQ has been making efforts to repair relationships with water purveyors, and I appreciate those efforts. However, there is still significant work to be done. A substantial fee increase at this time would likely strain those relationships further. Many water system operators primarily interact with DEQ as an enforcement agency rather than a partner or resource. Because of this, some systems are hesitant to reach out for assistance due to concerns that doing so may lead to additional requirements, violations, or increased project costs.

In my experience, and through conversations with operators throughout the region, many systems that are struggling often seek guidance from peers before contacting DEQ. I consistently encourage them to reach out to DEQ for assistance, but the common perception is that enforcement actions are more likely than collaborative problem-solving. Often, the only time systems hear from their regulator is when they are already in violation or during a sanitary survey. Strengthening this relationship is important, and a significant fee increase will make that effort more difficult. I have also been told by operators that the fee increase would be worth it if DEQ would simply leave them alone, which highlights the current challenges in these relationships.

There are also concerns regarding consistency within DEQ. At times, different branches or staff provide conflicting guidance, which can create confusion and lead to unnecessary costs. I have experienced this firsthand and have documentation supporting these inconsistencies. Our goal is always to work collaboratively with DEQ and be a strong partner; however, these challenges make it difficult to support a substantial fee increase at this time.

Additionally, there have been instances where our system has been required to comply with certain requirements while other municipalities were not held to the same standard. I am hesitant to formally raise these concerns, as I do not want to create hardship for other systems, but the inconsistencies are difficult to overlook. While there are many knowledgeable and helpful staff within DEQ, local representatives are often required to follow direction from management, which can limit flexibility and collaboration at the local level.

From a broader perspective, systems that are well-managed and proactive often require minimal regulatory involvement, while struggling systems naturally require more time and resources from DEQ. Although developing a fee structure based on time spent may be difficult, it is important to recognize that efficient systems often have limited interaction with DEQ outside of routine requirements.

There have also been situations where additional licensing or requirements were pursued at significant cost, only to later learn they were not necessary. Our engineering partners

have expressed similar concerns regarding changing or unclear requirements. In some cases, these added requirements have resulted in substantial costs that could have otherwise been invested directly into system improvements.

I would also note that when enforcement issues arise that require presentation to City Council or a governing board, we have requested DEQ participation or support, but unfortunately this involvement has not always been available. Greater collaboration in these situations could help foster stronger partnerships and improve outcomes.

If approved, it appears that the cost of public drinking water assessments will likely double.

While I understand and generally support reasonable increases as costs continue to rise, this proposed increase appears excessive and will impact all of our users, some more than others. Most utility boards and councils are already operating under tight budgets due to rising costs for materials, labor, and infrastructure improvements. Increasing regulatory fees will force utilities to either pass those costs on to customers or pull funding away from needed infrastructure projects and system improvements.

I have also spoken with several operators across the region, including some in Southern Idaho, who share similar concerns. Many have indicated that their governing boards and councils are also opposed to this increase. Some operators have expressed hesitation to submit comments due to concerns about potential repercussions for voicing disagreement.

I want to be clear that we value our relationship with DEQ and want to continue building a strong, collaborative partnership. There are many dedicated and knowledgeable individuals within the agency, and we appreciate their work. However, there are also areas where improvements could be made on both sides.

For these reasons, I cannot support the proposed fee increase at this time.

Thank you for your time and the opportunity to comment.

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