

From: City of Craigmont < >
Sent: Tuesday, April 14, 2026 3:39 PM
To: Tyler Fortunati <Tyler.Fortunati@deq.idaho.gov>
Subject: Drinking Water Program Fees Proposed Changes

To Whom It May Concern,

On behalf of the City of Craigmont, I am writing to provide input regarding the proposed revisions to the drinking water program fee schedule under IDAPA 58.01.08.

We understand that the current fee structure has remained unchanged since 1993 and that the purpose of these fees is to support the Idaho Department of Environmental Quality's implementation of the Safe Drinking Water Act and ensure continued protection of public health. We also recognize that rising program costs and anticipated reductions in federal funding necessitate a review of the existing fee structure.

While we appreciate DEQ's efforts to maintain adequate regulatory oversight and program sustainability, we have concerns regarding how the proposed changes may impact small, rural communities such as Craigmont.

Small public water systems operate with limited financial resources and a relatively small customer base. As a result, increases in program fees--particularly if significant or implemented all at once--can create challenges for maintaining affordability for residents while continuing to meet regulatory requirements.

We respectfully offer the following considerations:

- **Impact on Small and Rural Systems:** Fee adjustments should account for the limited rate base and financial capacity of small communities. A one-size-fits-all approach may disproportionately affect smaller systems.
- **Per-Connection Fee Structure:** Transitioning to a flat per-connection fee should be carefully evaluated to ensure it does not unintentionally shift a greater financial burden onto smaller systems with fewer connections.
- **Revenue Cap Adjustments:** Any changes to revenue caps should be clearly justified and structured in a way that maintains equity across system sizes and classifications.
- **Billing and Payment Requirements:** While electronic billing and payment options may improve efficiency, flexibility should remain for communities and customers who may have limited access to or preference for non-digital methods.
- **Phased Implementation:** If fee increases are necessary, a phased or incremental approach would allow local governments time to plan, budget, and communicate changes to residents.

We value DEQ's role in protecting public health and supporting Idaho's drinking water systems, and we appreciate the opportunity to participate in this rulemaking process. We encourage continued engagement with rural communities to ensure that any changes are both sustainable for the program and equitable for the communities it serves.

Thank you for your consideration.

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City of Craigmont
Laysn Berry
City Clerk
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