May 19, 2026

Via email: diane.cutler@deq.idaho.gov

Ms. Diane Cutler
Idaho Department of Environmental Quality
1410 N Hilton
Boise, ID 83706

Subject: Docket No. 58-0111-2601 Idaho Groundwater Quality Rulemaking - Initiated to align with federal national primary drinking water standards.

Dear Ms. Cutler,

The Idaho Rural Water Association (IRWA) is a 501(c)3 nonprofit organization established in 1987 to provide technical assistance, training, and representation to public drinking water and wastewater utilities in Idaho that serve communities with populations under 10,000. Due to the rural nature of our state, IRWA currently serves over 90 percent of public drinking water and wastewater systems. Our membership includes more than 385 drinking water and wastewater utilities and is governed by a seven-member, volunteer board of directors elected from among our membership.

These member utilities bear the vital responsibility of complying with all applicable state water and environmental regulations while ensuring safe and reliable drinking water and sanitation services 24 hours a day, 7 days a week. Idaho's rural and small communities work diligently to safeguard public health and protect the environment by maintaining these essential services.

We appreciate the opportunity to provide comments on behalf of our membership regarding the Idaho Department of Environmental Quality's (DEQ) rulemaking Docket No. 58-0111-2601 with updates to Idaho's Groundwater Quality Rule. IRWA participated in the initial negotiated rulemaking meeting held on May 13th. As part of this rulemaking, we respectfully submit the following recommendations.

IRWA supports the proposed changes in the Groundwater Quality Rule to remove outdated standards within Table II under Section 200.a, and to replace them with incorporation by reference to the National Primary Drinking Water Regulations. These changes will establish clarity and foster consensus between national and state regulatory agencies as well as with the drinking water personnel who ultimately uphold these rules for the health of their communities. We recommend that DEQ further clarify the contaminants listed in Table II between inorganic contaminants (Lead and Copper) and bacteriological contaminants (Total Coliform, E. Coli, and fecal coliform). While these five contaminants are regulated under Treatment Technique rather than MCL, it would prevent confusion for all parties to recognize their differences in the table.

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While aquifer categorization is not directly addressed in the current iteration of negotiated rulemaking for Idaho's Groundwater Quality Rule, IRWA would address this area of policy to encourage DEQ to incorporate local groundwater and/or source water protection efforts into the criteria for the petition process (Section 350.02). These efforts include source water protection plans, local ordinances, and locally established Aquifer Protection Districts. Acknowledging and integrating these protective measures into Idaho's Groundwater Quality Rule will develop local buy-in, establish a framework for future collaboration, and build trust between communities and regulatory partners. IRWA continues to advocate for required public comment opportunities within the petition process for aquifer categorization and prior to any final adoption of categorization or recategorization. Public comment and discussion fosters local involvement, demonstrates transparency, and ensures broader stakeholder involvement.

IRWA thanks DEQ once again for the opportunity to provide these comments and to participate in current and future stakeholder engagement processes. We remain committed to supporting a regulatory framework that protects Idaho's water resources while ensuring practical, efficient compliance pathways for rural and small utilities.

Respectfully,

Shelley Roberts
Chief Executive Officer
Idaho Rural Water Association

Courtnie Dawson
Utility Policy Analyst
Idaho Rural Water Association

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