May 15, 2026

via email: tyler.fortunati@deq.idaho.gov

Mr. Tyler Fortunati
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706

Subject: Docket No. 58-0108-2601 Drinking Water Fees – 5/8/2026 Stakeholder Meeting

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 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 systems. Our membership includes more than 385 drinking water utility systems and is governed by a seven-member, volunteer board of directors elected from among our member systems.

On behalf of our membership and your drinking water system constituents, we appreciate the opportunity for a second public comment period to reiterate our initial input on the Idaho Department of Environmental Quality's (DEQ) rulemaking for Drinking Water Fees, Docket No. 58-0108-2601 as well as comment on proposed changes in the 2nd rule draft.

IRWA participated in the stakeholder meeting held on May 8, 2026, in which several comments from the initial public comment period were incorporated into the most recent iteration of proposed rule changes, the Drinking Water Fees Negotiated Rule Draft No. 2. Our Association was pleased to see participation from several small, rural communities in this process, and we commend DEQ for their efforts to ensure those system representatives are heard.

IRWA reiterates that maintaining Idaho's Drinking Water Primacy is important and beneficial for Idaho's water utilities. Idaho's small, rural communities rely on the compliance and technical assistance services facilitated by DEQ, and recognize the significant challenges that these systems would face without DEQ's primacy, particularly increased costs and reduced assistance. We advocate strongly for continued collaboration between agency representatives and Idaho's water utilities to address projected shortfalls in federal funding that threaten the stability of DEQ's Drinking Water Program.

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IRWA approves of DEQ's advancement of the proposed flat rate + $5.50 per connection. We believe the proposed flat rate is more closely aligned with the costs of drinking water program management and the water systems that most directly benefit from the program. IRWA reiterates the importance of preventing future instability of the Drinking Water Program by establishing fee adjustments with more consistency and frequency, allowing for effective response to inflation and better predictability for utilities to respond accordingly. Consistent small increases to drinking water fees will be more manageable for utilities to plan for and incorporate into their budgets. In line with this recommendation, IRWA commends DEQ's acquiescence to stakeholder feedback by incorporating a phased process for the proposed fee increases over 2 to 4 years, allowing water systems and their communities to respond in a way that reduces financial strain.

IRWA continues to advocate for a mechanism within these proposed rule changes to return program funds when the agency is financially sustainable without additional funds from water systems, through fee discounts, refunds, or fee holidays. Keeping fee collections consistent with the program's needs will maintain transparency and trust between DEQ and drinking water systems. We also continue to affirm the need for DEQ to continue their work identifying and fulfilling acceptable service levels to the water systems funding the program to ensure continued positive collaboration.

Lastly, IRWA continues to support adjustments to electronic billing and payment methods in addition to the implementation and enforcement of late fees and collection processed for delinquent accounts. DEQ's use of these tools helps maintain accountability and therefore equity across the industry.

IRWA thanks DEQ for the opportunity to provide additional comments and to participate in the public and stakeholder engagement process for Docket No. 58-0108-2601. Our Association remains 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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