September 18, 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

Dear Mr. Fortunati:

The Idaho Rural Water Association (IRWA) provides training, technical assistance, and a representative voice for public drinking water and wastewater utilities in Idaho that serve communities with populations under 10,000. 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 IRWA's member systems, we appreciate the opportunity to participate in this third public comment period to demonstrate our support and reiterate our recommendations regarding the Idaho Department of Environmental Quality's (DEQ) rulemaking for Drinking Water Fees, Docket No. 58-0108-2601. IRWA has participated in all portions of the negotiated rulemaking process since the initial public discussion session on April 9, 2026. 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.

Throughout the negotiated rulemaking process, IRWA has advocated for a flat rate drinking water fee, with increases to be implemented in a phased approach and with the discretion to reduce or remove fees as warranted by DEQ. Our priority with these recommendations is to ensure a fair and equitable transition to the new fee structure for rural utilities with limited funding. IRWA's comments on behalf of our utility members have been implemented in the most recent iteration of the proposed rule changes. IRWA supports DEQ's most recent draft of Docket No. 58-0108-2601 and commends DEQ's engagement of rural utility professionals throughout the negotiated rulemaking process.

Respectfully,

Robert Dial
Board President
Idaho Rural Water Association

Peter Stayton
Board Legislative Director
Idaho Rural Water Association

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