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Brad Little, Governor
Jess Byrne, Director

September 28, 2026

The Honorable Brad Little
Governor of Idaho
PO Box 83720
Boise, ID 83720-00345

RE: Triennial Drinking Water Capacity Development Report

Dear Governor Little:

The Safe Drinking Water Act amendments of 1996 directed states to develop a capacity development strategy for assisting public water systems in maintaining adequate technical, financial, and managerial capacity. The 1996 amendments also require the Idaho Department of Environmental Quality (DEQ) to provide a capacity development report to the Governor every three years.

Enclosed is DEQ's Triennial Drinking Water Capacity Development Report for fiscal years 2024 through 2026. The report evaluates implementation of Idaho's Capacity Development Strategy, summarizes program accomplishments, evaluates progress in improving public water system capacity, and identifies challenges and priorities for the next reporting period.

During FY2024–FY2026, DEQ continued to assist public water systems through sanitary surveys, technical assistance, operator training and certification, facility planning, financial assistance, source water protection, and asset management resources. During the reporting period, DEQ completed 1,239 sanitary surveys, provided 125 technical assistance referrals, and supported 117 drinking water grants and loans totaling approximately $183.6 million.

These efforts support DEQ's ongoing implementation of Idaho's Capacity Development Strategy and its goal of helping public water systems maintain the capacity needed to provide safe and reliable drinking water to Idaho communities.

Sincerely,

Jess Byrne
Director

Attachment(s): 1

Triennial Capacity Development Report to the Governor

State Fiscal Years 2024–2026



State of Idaho

Department of Environmental Quality

September 2026

www.deq.idaho.gov

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DEQ, September 2026, Costs associated with this publication are available from the State of Idaho Department of Environmental Quality in accordance with Idaho Code § 60-202.

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Acronyms

CCR	Consumer Confidence Report
CEU	Continuing Education Unit
DEQ	Idaho Department of Environmental Quality
DWSRF	Drinking Water State Revolving Fund
EPA	US Environmental Protection Agency
ETT	Enforcement Targeting Tool
IDOPL	Idaho Division of Occupational and Professional Licenses
IRWA	Idaho Rural Water Association
IdWARN	Idaho Water and Wastewater Agency Response Network
O&M	Operation and Maintenance
PIFF	Preliminary Inspection Findings Form
PFAS	Per-and polyfluoroalkyl substances
PWS	Public Water System
RCAC	Rural Community Assistance Corporation
RTCR	Revised Total Coliform Rule
SDWA	Safe Drinking Water Act
SDWIS	Safe Drinking Water Information System
SMART	Smart Management Financial Tool
TFM	Technical, Financial, and Managerial
FY	Fiscal Year

Executive Summary

The Idaho Department of Environmental Quality (DEQ) administers Idaho's Capacity Development Program to help public water systems (PWSs) maintain the technical, financial, and managerial (TFM) capacity needed to provide safe and reliable drinking water and comply with applicable requirements. Idaho's Capacity Development Strategy provides the framework for identifying PWS capacity needs and delivering regulatory, technical, financial, planning, training, and other assistance.

This report evaluates implementation of Idaho's Capacity Development Strategy during State Fiscal Years (FY) 2024–2026. Consistent with Section 1420(c)(3) of the Safe Drinking Water Act, the report summarizes program accomplishments, evaluates progress toward improving PWS capacity, describes efforts to encourage asset management, and identifies challenges and priorities for the next reporting period.

During FY2024–FY2026, DEQ and its partners continued to identify and address PWS capacity needs through compliance monitoring, sanitary surveys, operator oversight, technical assistance, engineering review, facility planning, financial assistance, source water protection, and asset management resources. DEQ uses compliance information, sanitary survey findings, operator qualifications, facility planning, infrastructure needs, and other system-specific information to prioritize assistance and determine appropriate follow-up.

Key accomplishments during the reporting period included the following:

- 1,239 sanitary surveys completed by DEQ and participating public health districts.
- 125 technical assistance referrals provided to the Idaho Rural Water Association and Rural Community Assistance Corporation.
- 125 sanitary survey continuing education certificates issued to eligible drinking water operators.
- 117 drinking water grants and loans awarded, totaling $183.6 million.
- 30 drinking water planning grants and 29 drinking water construction loans awarded.
- 44 source water protection subgrants awarded, totaling $1.27 million.

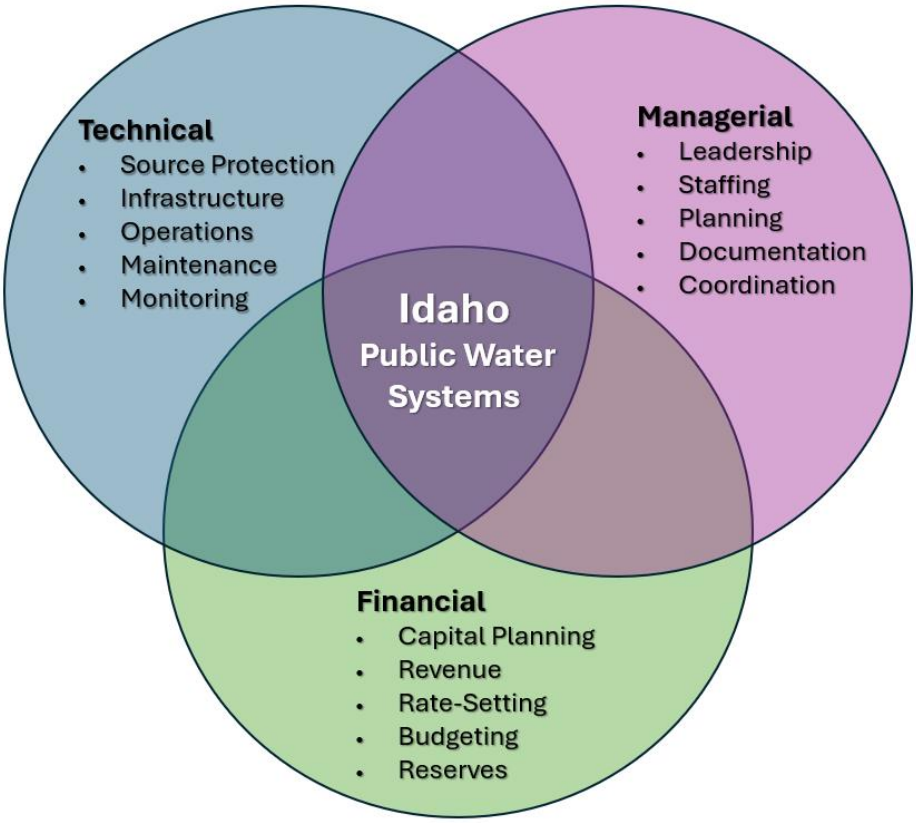
These activities demonstrate continued statewide implementation of the Capacity Development Strategy and provide measurable information on program reach. DEQ evaluates effectiveness using both program activity measures and system-specific information, including compliance status, sanitary survey findings, operator qualifications, infrastructure improvements, facility planning progress, and completion of corrective actions. Because improvements in PWS capacity may occur over multiple years and may depend on factors outside the Capacity Development Program, activity measures are considered together with system-specific results when evaluating program effectiveness.

Asset management remains an important component of long-term capacity development. DEQ encourages PWSs to consider asset condition, service needs, critical assets, life-cycle costs, and long-term funding needs when planning infrastructure improvements. DEQ provides asset management and financial planning resources through the Public Water System Switchboard

and incorporates asset management considerations into facility planning and the Drinking Water State Revolving Fund process.

The reporting period also reinforced several continuing challenges, including limited financial resources, staffing and workforce constraints, access to qualified operators and technical expertise, increasing regulatory requirements, and the need for long-term infrastructure and financial planning. These challenges are particularly relevant to small and rural PWSs and support the continued use of targeted technical assistance, operator training, financial assistance, and partnerships.

For the next reporting period, DEQ will continue to prioritize PWSs with significant capacity or compliance needs, strengthen assistance to small PWSs, support operator certification and workforce development, encourage asset management and long-term infrastructure planning, support financial sustainability and access to funding, maintain technical assistance partnerships, and improve measurement of the Capacity Development Program outcomes.



1 Introduction

The Idaho Department of Environmental Quality (DEQ), as the state's primacy agency for implementing the federal Safe Drinking Water Act (SDWA), administers Idaho's Capacity Development Program to help public water systems (PWSs) acquire and maintain adequate technical, financial, and managerial (TFM) capacity to provide safe drinking water and comply with applicable drinking water requirements. The SDWA and Idaho Rules for Public Drinking Water Systems (*IDAPA 58.01.08*) establish regulatory requirements that PWSs must meet to demonstrate capacity. Capacity development is a preventive approach that strengthens a system's ability to comply with drinking water requirements, effectively operate and maintain its facilities, manage its resources, and sustain reliable service over time. This Program is federally supported through set-asides from the US Environmental Protection Agency's (EPA's) Drinking Water State Revolving Fund (DWSRF) capitalization grant, established under the 1996 amendments to the SDWA. Technical, financial, and managerial capacity are described below consistent with the requirements of IDAPA 58.01.08.500.01-03:

- **Technical capacity** refers to the ability of a public water system to meet applicable design, construction, and operating requirements; maintain an adequate and consistent water supply; protect its water source and prepare for emergencies; plan for infrastructure improvement and replacement; and maintain trained personnel with knowledge of the system's technical and operational characteristics.
- **Financial capacity** refers to the ability of a public water system to establish adequate organizational and financial arrangements for construction, operation, and maintenance; demonstrate sufficient revenues to support operations, depreciation, reserves, and capital replacement; and maintain adequate fiscal controls.
- **Managerial capacity** refers to the ability of a public water system to maintain clear ownership and accountability; establish an effective management structure; employ qualified and appropriately trained personnel; maintain communication with customers, service providers, and regulatory agencies; and plan for future growth, infrastructure maintenance, and long-term system replacement.

Every three years, federal law requires the state to submit a Capacity Development Program Report to the Governor, as required by Section 1420(c)(3) of the SDWA. This document fulfills the reporting requirement for State Fiscal Years 2024–2026. The SDWA requires states to submit a triennial report to the Governor describing the effectiveness of the state's Capacity Development Strategy and progress toward improving the TFM capacity of PWSs. The report must also address efforts to encourage PWSs to develop asset management plans and to train appropriate personnel in implementing those plans.

This report fulfills the reporting requirement for State Fiscal Years (FY) 2024-2026. It evaluates implementation of Idaho's Capacity Development Strategy, summarizes activities and investments made during the reporting period, describes progress toward improving TFM capacity, and identifies challenges and future priorities.

2 Capacity Development Program

DEQ implements Idaho's *Capacity Development Program* through a coordinated framework of regulatory oversight, technical assistance, financial resources, training, and partnerships. The program is designed to support PWSs in developing and maintaining the TFM capacity needed to provide safe and reliable drinking water.

2.1 Idaho's Capacity Development Strategy

Idaho's Capacity Development Strategy (*DEQ 2022*) provides a framework for PWSs to acquire and maintain the TFM capacity needed to achieve the public health objectives of the SDWA. The strategy is implemented through DEQ's drinking water program and emphasizes public health protection, regulatory compliance, and maintaining the capacity of PWSs to provide safe and reliable drinking water.

The strategy prioritizes systems experiencing compliance problems based on potential public health impacts and uses compliance information, sanitary surveys, operator qualifications, facility planning, and other available information to identify systems that may need capacity development assistance. DEQ works with PWSs and other partners to provide technical, financial, regulatory, and planning assistance to address identified needs.

Idaho evaluates progress in capacity development using compliance trends, sanitary surveys, the Enforcement Targeting Tool (ETT), facility planning, DWSRF activities, asset management, and other system-specific information. The strategy provides a framework for evaluating program implementation and effectiveness including progress in improving PWS TFM capacity and identifying opportunities for continued improvement.

2.2 Prioritizing Capacity Development Assistance

DEQ's Capacity Development Program targets PWSs experiencing compliance problems, with prioritization based on potential public health impacts. Small PWSs may face additional challenges because of limited financial resources, staffing, and access to technical expertise. These factors can affect a system's ability to operate and maintain infrastructure, meet regulatory requirements, and sustain reliable drinking water service.

Assistance is available to all PWSs in need and willing to work with DEQ or its partners in achieving compliance. Capacity development efforts are directed towards providing the necessary tools to assist PWSs in maintaining compliance and protecting public health. DEQ uses information from regulatory oversight, field evaluations, system planning, and other program activities to identify capacity needs and determine appropriate assistance. To identify systems in greatest need of assistance, the following information is utilized:

Compliance Information—Statewide and system-specific compliance trends are used to identify PWSs that may need TFM assistance. Data entered in the Safe Drinking Water Information System (SDWIS) is queried daily through an automated system. If an exceedance of

a maximum contaminant level or trigger level is detected, an automated "Exceedance Notification" email is sent to DEQ staff for appropriate follow-up. The maximum contaminant level is the highest level of a contaminant that is allowed in drinking water. The trigger level is a value that when achieved or exceeded requires a specific action be taken by the PWS.

Enforcement Targeting Tool—EPA's ETT is used to identify PWSs with significant compliance concerns, including systems with health-based violations and systems with a history of violations across multiple rules. Health-based violations are reviewed by DEQ staff monthly to proactively address these violations and assist PWSs in their goal to serve water that meets all health-based standards. Proactive work on health-based violations may also prevent water systems from being placed on the ETT list. Through proactive reviews of health-based violations, DEQ can identify systems with significant compliance concerns and determine whether additional assistance or follow-up is appropriate.

Sanitary Surveys—An on-site review and evaluation of a PWS's water sources, treatment, storage, distribution system, pumps, pump facilities and controls, monitoring and reporting, system management and operation, and maintenance to determine the system's adequacy to provide safe drinking water. Comprehensive sanitary surveys continue to be a fundamental public health protection tool for assessing, evaluating, and documenting the TFM capacity of PWSs throughout the state. The surveys assist owners and operators in both short- and long-term planning activities associated with their systems. Sanitary surveys also identify deficiencies that may affect a PWS's ability to provide safe and reliable drinking water and identify systems that may need technical or capacity development assistance.

System Operations and Operator Qualifications—PWSs need a certified operator that understands the system's technical and operational functions, knows drinking water regulatory practices, and implements the system's operation and maintenance (O&M) plan.

- Systems lacking a qualified, properly certified licensed responsible charge operator often need capacity development assistance.
- On a quarterly basis, compliance with operator licensing requirements is evaluated, and water systems are notified of any operator licensing issues.

Operator qualifications are considered when evaluating a PWS's technical and managerial capacity and determining whether additional assistance may be appropriate.

Facility Planning, System Improvements, and DWSRF Activities—Tracking facility plans, preliminary engineering reports, plans and specifications, and other project submittals provides information on infrastructure needs, system deficiencies, and planned improvements. Facility planning and DWSRF activities provide opportunities for PWSs to evaluate infrastructure needs, develop improvement alternatives, obtain *financial assistance*, and implement projects that support safe and reliable drinking water service. DEQ's facility planning program evaluates projects based on factors including potential public health and environmental risks, long-term system viability, and compliance status.

***Providing Assistance and Evaluating Outcomes*—**Once a capacity need is identified, DEQ works with the PWS and, when appropriate, partner organizations to determine the type of assistance needed. Technical assistance may include operational troubleshooting, regulatory clarification, infrastructure planning, financial and managerial capacity building, funding application assistance, training, and other system-specific support. DEQ may provide assistance directly or coordinate with organizations such as the Idaho Rural Water Association (IRWA) and Rural Community Assistance Corporation (RCAC).

DEQ evaluates progress following capacity development assistance using available compliance and system-specific information. Follow-up may include reviewing compliance status, sanitary survey findings, ETT status, operator qualifications, completion of facility planning or system improvements, and other information relevant to the identified capacity need. This approach allows DEQ to identify and prioritize PWSs needing assistance, provide targeted capacity development assistance, and evaluate whether identified deficiencies have been addressed or additional assistance is needed.

2.3 Assessing Capacity Development Assistance

DEQ evaluates capacity development assistance using compliance information, sanitary survey findings, Preliminary Inspection Findings Form (PIFF), operator qualifications, facility planning, infrastructure needs, and other available information. These sources help DEQ determine whether assistance is addressing identified TFM capacity needs.

DEQ considers both program activities and system-specific results when evaluating assistance. Program measures include sanitary surveys completed, technical assistance referrals, operator training, planning activities, and financial assistance. System-specific measures may include changes in compliance status, sanitary survey findings, operator qualifications, infrastructure improvements, and progress in addressing identified deficiencies. This information helps DEQ determine whether additional assistance is needed and supports continued improvement of Idaho’s Capacity Development Strategy.

3 Implementation of Idaho's Capacity Development Strategy

Idaho implements its Capacity Development Strategy through regulatory oversight, engineering review, compliance monitoring, sanitary surveys, technical assistance, operator certification and training, financial assistance, infrastructure planning, and other resources. These activities support PWSs in acquiring and maintaining TFM capacity and are directed toward systems with identified or potential capacity needs. The Capacity Development Program focuses on both new and existing PWSs to:

- Ensure new community water systems[1] and nontransient, noncommunity water systems[2] are viable through guidance and technical review.
- Provide safe drinking water by maintaining compliance with regulatory requirements through timely information and technical assistance to owners and operators.
- Ensure they are operated by qualified personnel by requiring properly licensed operators.

3.1 New and Substantially Modified Public Water Systems

Idaho requires new and substantially modified community and nontransient, noncommunity PWSs to demonstrate adequate TFM capacity to DEQ before construction or operation, as required under IDAPA 58.01.08.500. Demonstration of these capacities must be submitted to DEQ prior to, or concurrent with, submitting system engineering plans and specifications. The documentation is then reviewed by DEQ's licensed professional engineers. The review provides an opportunity to identify potential capacity concerns before significant resources are invested in a project. DEQ evaluates applicable engineering plans and specifications, facility planning, operation and maintenance requirements, and TFM information and works with owners, developers, engineers, and other project representatives to address identified needs.

Owners proposing material modifications of existing PWSs, as defined in IDAPA 58.01.08.003.31, are subject to applicable requirements based on the nature and scope of the modification. Like-kind replacements are not considered material modifications. Changes in ownership may require evaluation of the system's ability to maintain adequate TFM capacity. When deficiencies are identified, DEQ works with the owner to establish corrective actions and a reasonable path toward compliance.

DEQ provides guidance, checklists, and technical assistance through its regional offices and the Public Water System Switchboard. In 2023, DEQ updated its guidance for *Demonstrating Technical, Financial, and Managerial Capacity in New Public Water Systems*. This new-system component of the Capacity Development Program provides a preventive approach by identifying potential TFM capacity concerns before a new PWS begins operation or a substantial modification is completed.

Public Water System Switchboard—The *Public Water System Switchboard* has applications that use information from DEQ's SDWIS database to assist a PWS in developing TFM capacity. The Switchboard (Figure 1) provides owners and operators with links to rules, monitoring schedules, plans and specifications, public notification templates, sanitary survey

[1] **Community water system:** A public water system that serves at least 15 service connections used by year-round residents or regularly serves at least 25 year-round residents (IDAPA 58.01.08.003.15). Examples include municipally owned public drinking water supplies (cities, towns) or privately owned drinking water suppliers such as homeowner associations, apartment complexes, and mobile home parks.

[2] **Nontransient, noncommunity water system:** A public drinking water system that is not a community water system and that regularly serves at least 25 of the same persons over 6 months per year (IDAPA 58.01.08.003.89). Examples include schools, day care centers, hospitals, offices, industrial parks, and major shopping centers.

forms, drinking water system classification requirements, operator licensing, and more. Web-based resources and training materials are available to assist PWS owners and operators in maintaining compliance and building capacity.

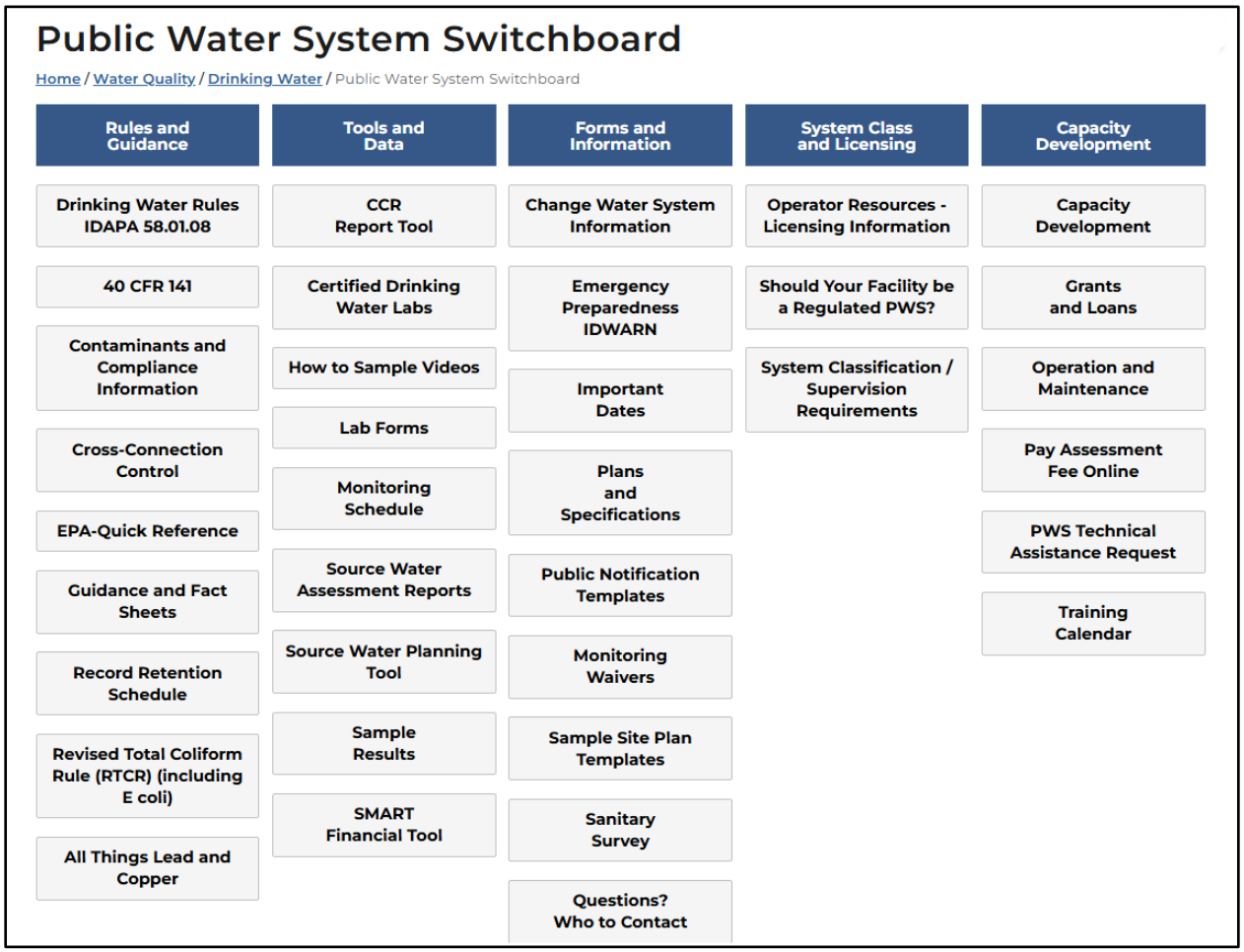


Figure 1. DEQ's Public Water System Switchboard, a centralized online portal providing access to public drinking water information and resources.

Training Calendar—The Public Water System Switchboard links to a comprehensive *training calendar* that is populated by trainers with class information as soon as it is available. This calendar provides timely information about training for PWS owners and operators for new and existing systems. Properly trained water system staff are critical for delivering safe and reliable drinking water and protecting public health. DEQ maintains an online training calendar for PWS operators to easily access and identify upcoming operator training resources.

Emergency Preparedness/IdWARN—DEQ's Drinking Water Bureau initiated IdWARN (*Idaho Water and Wastewater Agency Response Network*), a mutual aid organization of communities helping communities by allowing owners of water and wastewater utilities to assist each other during emergencies (utilities helping utilities). This site links resources on emergency response plans, resiliency, drought, earthquakes, flooding, wildfires, power outages and emergency generators. The participants can access specialized resources, including staff, to

assist water and wastewater systems until the system can return to normal operating conditions. The program is administered by an IdWARN statewide committee through the IRWA and is available to all public and private water and wastewater system owners in Idaho. Participation is voluntary but strongly encouraged to support effective implementation for emergency response.

3.2 Existing Public Water Systems: Compliance and Technical Assistance

For existing PWSs, DEQ uses compliance information, sanitary survey findings, operator qualifications, facility planning, infrastructure needs, and other available information to identify systems that may benefit from capacity development assistance. DEQ uses this information to identify TFM capacity needs and to target assistance toward systems requiring additional support to maintain compliance and provide safe and reliable drinking water. Assistance may include regulatory and compliance guidance, sanitary survey follow-up, operator training and certification support, facility planning, financial management resources, asset management assistance, and referrals to qualified technical assistance providers. DEQ also coordinates with district health departments and organizations such as the IRWA and RCAC to provide or facilitate assistance. These activities support Idaho's Capacity Development Strategy by helping existing PWSs address identified deficiencies, strengthen TFM capacity, and maintain long-term system sustainability. Additional details on the compliance, technical assistance, and capacity development activities are provided below.

Data Management—Data management and data entry procedures, through DEQ's SDWIS database, are critical to efficiently track water system compliance and support DEQ compliance monitoring and assistance efforts. More importantly, the database is a critical tool for ensuring drinking water standards are met, and water is safe to drink.

Sample Results—Sampling results are available online through an application that utilizes information from DEQ's SDWIS database. The application is available via the online *Drinking Water Watch Tool*. Results are available to view by anyone interested in information about a regulated PWS. Additional information found within the Drinking Water Watch tool includes the list of a water system's facilities, their sample schedules, the number of connections, points of contact, monitoring results, violations/enforcement actions, and past site visits.

Monitoring Schedules—Monitoring schedules assist PWS owners and operators in maintaining compliance with drinking water monitoring requirements. The *Monitoring Schedule Report* identifies current-year monitoring requirements and whether those requirements have been satisfied. The report can also be used to identify future monitoring requirements and support short- and long-term monitoring planning.

Auto Dialer—DEQ provides automated telephone and email reminders to PWS owners and operators to inform them of upcoming sampling deadlines. This low-cost, high-impact activity has resulted in a reduction in failure-to-monitor violations. DEQ has expanded the calls to include reminders for public notifications, sanitary survey significant deficiencies, Revised Total

Coliform Rule seasonal system start-up procedures, and lead consumer notification at homeowner's taps. The auto-dialer has also been used to notify water systems impacted by a regional power failure of the need to disinfect and flush the system.

Source Water Protection—Identifying potential sources of contamination in watersheds and recharge areas, and the conditions under which the risks increase is the first step in a multiple barrier approach to protecting drinking water. Source water protection strategies are a more cost-effective approach to protect source water from contamination than to remove contamination during treatment. Systems with a certified source water protection and emergency response plan are granted additional points when applying for DEQ-administered drinking water grants and loans.

DEQ's *Source Water Assessment Map* provides a visual representation of PWS source water assessment areas and identified potential contaminant sources within those areas. The map allows PWS owners, communities, and other stakeholders to better understand potential threats to drinking water sources and support source water protection efforts.

Source Water Protection Planning Tool—The *Source Water Protection Planning Tool* assists water systems in developing a source water protection plan and emergency response plan. The tool prepopulates information into the report including source locational data, contact information, potential contaminate inventory system, and county emergency contacts. The tool gathers information from existing databases, as well as input from user entry to create a planning document.

Source Water Assessment Reports—*Source Water Assessments* provide information on the potential contaminant threats to public drinking water sources. The delineated source water assessment area is the physical area contributing water to the source. A potential contaminant inventory describes facilities, land uses, and environmental conditions within the delineated source water assessment area. DEQ uses this information as part of the susceptibility scoring of each source. These assessments are available to the public on the PWS switchboard. To assist PWSs with source water assessments, DEQ has developed an interactive Source Water Assessment Map and a direct *search engine*.

Consumer Confidence Reports—DEQ and district health departments assist community PWS owners and operators in meeting annual Consumer Confidence Report (CCR) requirements, which require systems to provide customers with information on water sources, detected contaminants, compliance status, and public health education by July 1 and certify delivery to DEQ. To make CCR reporting easier, DEQ provides online applications to help owners and operators complete their required CCR report. This report is completed by each community system with the sampling/monitoring and violation information from their files or that same information can be easily downloaded from an online DEQ application. These components help water system owners and operators communicate effectively with their customers. The entire CCR can be prepared online using DEQ's *Consumer Confidence Reporting Tool*.

Public Notification Templates—Public notifications inform customers of any potential adverse health effects related to their drinking water and what steps they can take to minimize

the impact. Under SDWA, the PWSs are required to inform their customers of any violations of the state's drinking water standards. Templates are available for required Revised Total Coliform Rule (RTCR) Tier 1 and 2 notifications, lead and copper, loss of pressure, and non-RTCR Tier 1, 2, and 3 notifications. Links are available to templates for cyanotoxins in finished drinking water above the health advisory and manganese. A loss of pressure below 20 psi or a complete loss of pressure can allow contamination to enter the distribution system and may require Tier 1 public notice within 24 hours. Depending on the circumstances, notice may include an Informative Notification, Boil Water Advisory, or Do Not Drink Advisory. DEQ provides *Public Notification Templates* to assist PWSs in preparing required public notices and meeting applicable notification requirements.

Public Drinking Water System Assistance—DEQ and its partners strive to improve the capacity of PWSs by offering direct assistance and providing online tools to help with reporting requirements. DEQ develops and publishes regulatory guidance (*Guidance and Fact Sheets*) for PWS owners and operators to help them interpret and implement rules and regulations. The Public Water System Switchboard provides water system owners and operators with links to rules and checklists to assist with preparing plans and specifications, public notification templates, sanitary survey forms, drinking water classification requirements, and operator licensing.

DEQ Technical Assistance—DEQ regional and state office staff provide a variety of direct technical assistance over the telephone, through correspondence, and in person (both one-on-one and in training workshops) to system owners. This assistance includes providing information on submitting updated facility plans for review, complying with microbiological and chemical sampling requirements, conducting sanitary surveys, reviewing operation and maintenance plans, reviewing cross-connection control programs, handling water quality complaints, and issuing public notification for drinking water emergencies, such as contamination events and boil water advisories.

District Health Department Technical Assistance—DEQ contracts with six of Idaho's seven public health districts (PHDs) to provide technical assistance to small PWS owners and operators. These PHDs provide one-on-one assistance similar to that provided by DEQ and conduct sanitary surveys in coordination with DEQ regional offices. This partnership is an integral component of the Idaho Drinking Water Program. The jurisdictions of the DEQ regional offices and participating PHDs are shown in Figure 2. DEQ's regional offices include Coeur d'Alene (CRO), Lewiston (LRO), Boise (BRO), Twin Falls (TFRO), Pocatello (PRO), and Idaho Falls (IFRO). Participating PHDs include the Panhandle Health District (PHD1), Public Health–Idaho North Central District (PHD2), Southwest District Health (PHD3), Central District Health (PHD4), South Central Public Health District (PHD5), and Southeastern Idaho Public Health (PHD6).

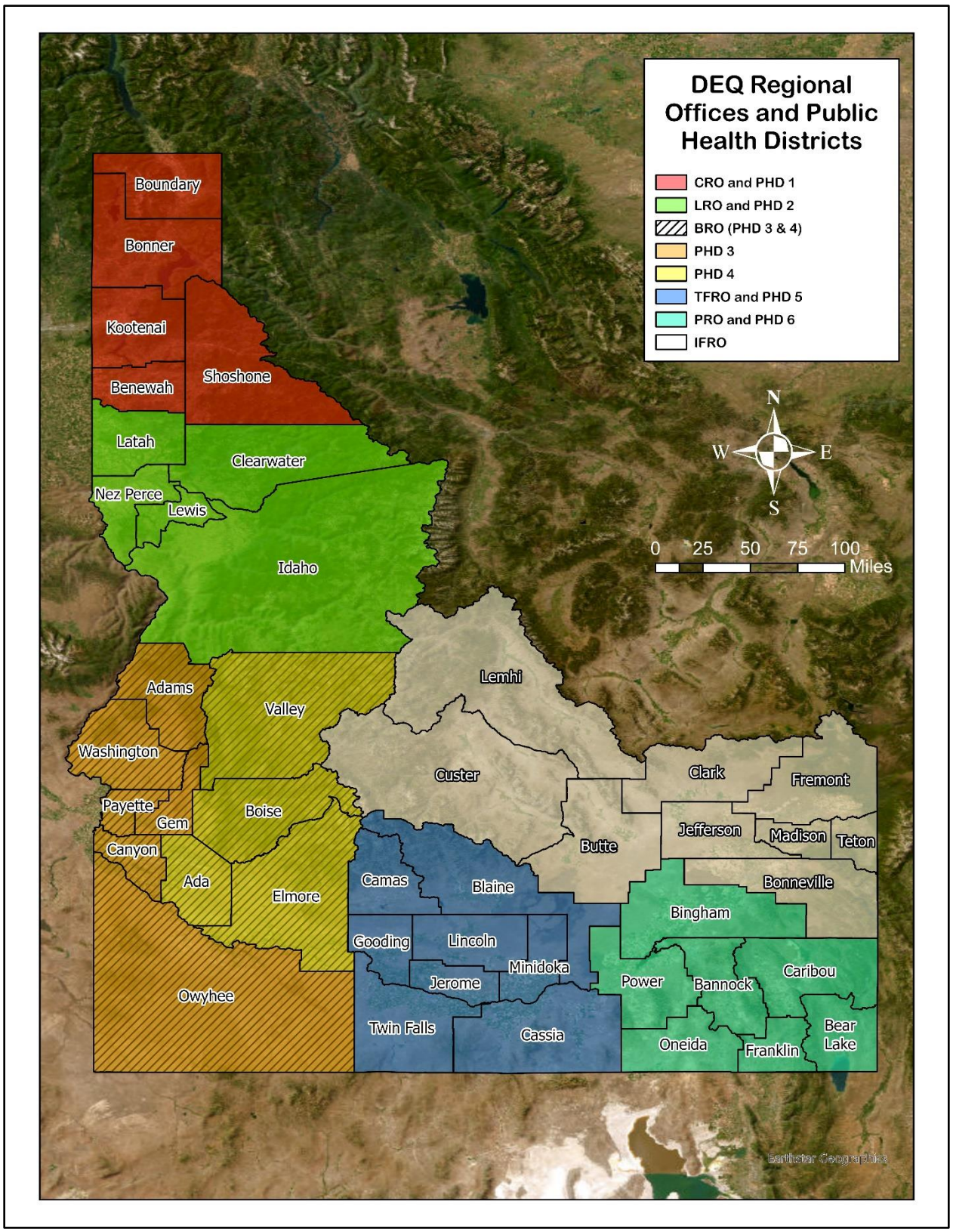


Figure 2. Jurisdictions of DEQ's regional offices and Public Health Districts (PHDs) providing coordinated oversight of PWS operations.

Outreach and Assistance—DEQ staff participate in training sponsored by technical assistance providers for rule requirements, Public Water System Switchboard, sanitary survey preparation, and other relevant issues. Staff presentations were made to several organizations about emerging contaminants, funding opportunities, and rule requirements.

Third-Party Service Providers—Water systems can request no-cost technical assistance from third-party providers using a PIFF available during the sanitary survey. DEQ provides the PIFFs to approved providers, including the RCAC and IRWA, after the sanitary survey site visit is complete. The third-party providers then contact the PWS directly to offer assistance. During FY2024–FY2026, DEQ provided 125 technical assistance referrals to third-party providers, as shown in Table 1.

Table 1. Technical assistance referrals submitted through the PIFF, FY2024–FY2026.

Technical Assistance Provider	Fiscal Year	Number of Referrals
IRWA and RCAC	FY24	36
IRWA and RCAC	FY25	29
IRWA and RCAC	FY26	60
Total	**FY2024–FY2026**	**125**

3.3 Capacity Assessment and Sanitary Surveys

DEQ implements Idaho's Capacity Development Strategy through established drinking water program processes that identify PWS needs and provide appropriate support. The following sections describe how these processes are applied to new and existing PWSs and how information from compliance activities, capacity assessments, and program assistance is used to support TFM capacity.

Sample Site Plans—Sample site plans specify the locations where samples are collected throughout the entire water system. This plan ensures samples represent water quality from the source to the ending distribution of drinking water to the customers. Sample site plans help determine if a water system is testing their water properly and that the sample results are accurate.

Level 2 Site Assessments—Water systems must conduct assessments, for protection against potential fecal contamination, in accordance with *40 CFR 141.859*. DEQ staff conduct Level 2 Site Assessments following an *E. coli* maximum contaminate level (MCL) violation. These assessments are used to identify sanitary defects or issues that led to the violation and recommend corrective actions to resolve the issue.

Sanitary Surveys—*Sanitary surveys* are a primary tool DEQ uses to assess PWS capacity and identify systems that may need technical or capacity development assistance. Sanitary surveys evaluate the water source, treatment, storage, distribution, pumps and controls, monitoring and reporting, management and operations, compliance, security, and financial capacity of a system.

Sanitary survey findings help DEQ identify deficiencies and potential risks that could affect a system's ability to provide safe and reliable drinking water. DEQ uses these findings with other available information, including compliance data and operator qualifications, to prioritize assistance and determine whether additional TFM assistance is appropriate. Survey findings may also be used to coordinate follow-up with PWSs and technical assistance providers.

DEQ oversees Idaho's statewide sanitary survey program and conducts surveys through its regional offices and in partnership with Idaho's PHDs. DEQ conducts surveys of larger systems and contracts with the PHDs to conduct surveys of smaller systems. Idaho's rules generally require sanitary surveys every three years for community water systems and every five years for noncommunity systems, with certain community systems eligible for a five-year frequency based on performance. During FY2024–FY2026, DEQ and its PHD partners completed 1,239 sanitary surveys as shown in Table 2.

Table 2. Sanitary surveys conducted by DEQ and PHDs, FY2024–FY2026.

Responsible Agencies	Fiscal Year	Number of Sanitary Surveys
Idaho DEQ and Public Health Districts	FY24	388
Idaho DEQ and Public Health Districts	FY25	420
Idaho DEQ and Public Health Districts	FY26	431
Total	**FY2024–FY2026**	**1,239**

DEQ uses an electronic sanitary survey process to standardize inspections and reporting statewide. The electronic process incorporates a comprehensive review of TFM capacity and uses system information from SDWIS to support survey preparation and documentation. The standardized format promotes consistent evaluation of PWSs and helps identify deficiencies, recommendations, and conditions requiring follow-up.

The sanitary survey process also provides resources to help owners and operators prepare for inspections and evaluate their systems. DEQ makes the sanitary survey form available through the Public Water System Switchboard, allowing systems to review the areas evaluated during an inspection and prepare records and facilities for review. The sanitary surveys serve both a regulatory and capacity development function by providing system-specific information that DEQ can use to identify needs, prioritize assistance, coordinate technical support, and evaluate progress in maintaining the capacity necessary to provide safe and reliable drinking water.

To assist PWS owners and operators in preparing for their sanitary survey, the *State of Idaho Public Water System Sanitary Survey* form used by state inspectors is available on DEQ's Public Water System Switchboard. The form provides transparency about the areas evaluated during a sanitary survey and allows system owners and operators to review records and system conditions before an inspection. DEQ encourages owners and operators to use the form to conduct self-inspections and prepare for sanitary surveys. This preparation can help systems identify and address deficiencies before or during the survey and become familiar with the information evaluated by inspectors.

DEQ's standardized electronic sanitary survey process promotes consistent application of drinking water requirements and reporting statewide. The process helps inspectors and PWS representatives identify deficiencies, recommendations, and other conditions requiring follow-up. Information collected during sanitary surveys is also used with other system information to identify PWSs that may benefit from technical assistance or other capacity development resources.

DEQ provides a *free onsite training opportunity* that allows eligible, certified drinking water operators to earn Continuing Education Units (CEUs) for completing presurvey activities, participating in the sanitary survey, and assisting with corrective action planning and follow-up. The CEUs are offered to operators of systems classified as "Very Small", "Distribution 1", "Distribution 2", and "Treatment 1". The training provides operators with an opportunity to apply their knowledge to their own system while supporting the sanitary survey and corrective action process. The opportunity to receive CEUs helps operators maintain their licensure requirements. During FY2024–FY2026, 125 sanitary survey CEU certificates were issued shown in Table 3.

Table 3. Sanitary survey CEU certificates issued by fiscal year, FY2024–FY2026.

Course Title	Fiscal Year	Number of Certificates Issued
Sanitary Survey CEU Course	FY24	34
Sanitary Survey CEU Course	FY25	52
Sanitary Survey CEU Course	FY26	39
Total	**FY2024–FY2026**	**125**

The CEU component combines regulatory inspection, operator training, and corrective action planning to provide an additional mechanism for strengthening technical capacity.

3.4 Operator Capacity and Certification

Certified operators are responsible for the day-to-day management of a drinking water system's operation. Some of the duties and responsibilities of a licensed operator include sampling, calculating, and determining the chemical applications; operating and maintaining system equipment; issuing public notices to users when systems are not in compliance; and recordkeeping. Qualified operators are an essential component of a PWS's technical capacity and support compliance with drinking water requirements.

Statewide Operator Training—Operator training events are conducted throughout Idaho by private vendors. Organizations including RCAC, IRWA, and the Environmental Finance Center receive EPA training grant funding and provide training and technical assistance to Idaho drinking water operators. DEQ maintains an online calendar of operator training events on the Public Water System Switchboard, where training opportunities and schedules are posted as they become available. The calendar allows training providers to post available courses and schedules as information becomes available.

DEQ staff, in collaboration with the IRWA, provided operator training during fall and spring operator conferences throughout the reporting period. Presentations addressed topics

including the Public Water System Switchboard, emerging drinking water contaminants including per- and polyfluoroalkyl substances (PFAS), risk and resilience assessments, emergency response plans, funding opportunities, and lead and copper rule changes. Training opportunities and schedules are available through the DEQ training calendar. As previously noted, DEQ provides continuing education credit to eligible operators who participate in the sanitary survey process.

Drinking Water Operator Licensing—In Idaho, the Idaho Board of Drinking Water and Wastewater Professionals oversees the licensing of drinking water operators and establishes requirements for operator licenses, including education and continuing education requirements and fees. The Board has entered into an agreement with the Idaho Division of Occupational and Professional Licenses (IDOPL) to review and recommend applications, administer examinations, collect fees, and issue operator licenses.

DEQ has separate responsibilities for PWS operator requirements. DEQ determines PWS classifications and ensures that applicable community, nontransient noncommunity, and surface water PWSs are supervised by appropriately licensed, responsible-charge operators and licensed operating personnel. DEQ uses operator licensing information as part of its oversight of PWSs and evaluation of operator capacity. To support drinking water operators and PWS owners, DEQ provides a centralized *operator resources* page with information on operator licensing, training, responsible-charge requirements, and locating licensed operators.

This coordination among the Board, IDOPL, and DEQ provides the regulatory and licensing framework for ensuring that PWSs have appropriately licensed operators.

Online Operator Search Tool—DEQ developed and maintains an *Online Operator Search Tool* to help licensed operators and PWS owners connect with each other. The tool provides a resource for PWS owners that need access to qualified and licensed operators and supports the technical capacity of PWSs. Online tools are available to become an operator for hire and for a PWS in need of an operator to search for a contract operator. Operators can access the online database and list themselves as available for hire. The tool cross-checks IDOPL records and provides operators' names only if they are properly licensed. If a listed operator's license lapses, the database tool automatically drops the operator from the list. By connecting PWS owners with licensed operators, the tool provides a mechanism for addressing operator availability and supporting compliance with applicable operator requirements.

Resources are available on the Public Water System Switchboard to find licensed operators or obtain a license:

- Licensed operators who are interested in providing professional services to other drinking water systems can register their information in the online application, "Become an Operator for Hire".
- To assist owners in finding a licensed operator, DEQ maintains the web-based application, "Search for an Operator".
- DEQ maintains the document, "Recommendations for Hiring a Contract Operator".

- For operators needing licenses, the IDOPL provides online applications and the required qualifications necessary to obtain a license.

These resources are part of DEQ's broader efforts to support a PWS technical capacity by helping systems identify and maintain access to appropriately licensed operators.

System Classification—The "Idaho Rules for Public Drinking Water Systems" (*IDAPA 58.01.08*) require that DEQ classify all community, nontransient noncommunity, and surface water PWSs with a treatment and/or distribution classification based on indicators of potential health risk. Criteria used to determine potential health risks include the system's complexity, size, and source water for treatment facilities; complexity and size of distribution systems; and other criteria deemed appropriate. Systems are classified by type (treatment or distribution) and class. Classifications range from Very Small to Class I, II, III, or IV. The rules also require that public drinking water systems be staffed by licensed operators based on the system classification.

PWS owners or operators are required to complete and submit the classification worksheet to DEQ every five years (IDAPA 58.01.08.553). The Drinking Water Bureau developed an application that produces real-time system classifications based on DEQ's drinking water database (SDWIS) information. Once a PWS's information has been entered into the drinking water database, the system classification is automatically generated through this "System Classification Worksheet" application. System classification supports technical capacity by establishing operator licensing and staffing requirements based on the characteristics of each PWS.

3.5 Financial and Infrastructure Assistance

DEQ provides financial and infrastructure assistance to help PWSs address identified capacity needs, maintain regulatory compliance, and support long-term system reliability. Assistance includes drinking water planning grants, DWSRF construction loans, and source water protection grants. These programs help PWSs address infrastructure deficiencies, plan for future needs, and maintain TFM capacity.

Table 4 summarizes drinking water grants and loans awarded and associated funding amounts during FY2024–FY2026. DEQ awarded 117 grants and loans totaling $183,559,589 during the reporting period. Figure 3 shows annual funding awarded to Idaho PWSs. Funding decreased by approximately $10 million per year, reflecting the availability and timing of federal, state, and other drinking water funding sources.

Figure 4 shows the number of awards by funding program. During FY2024–FY2026, DEQ awarded 34 planning grants, 29 drinking water construction loans, and 25 emerging contaminants grants. Award levels varied by year based on project needs, readiness, funding availability, and program eligibility. The geographic distribution of drinking water grants and loans by county and DEQ region during FY2024–FY2026, demonstrating the statewide distribution of financial assistance is shown in Figure 5.

Table 4. Grants and loans awarded to Idaho PWSs, FY2024–FY2026.

Fiscal Year	Number of Grants and Loans	Amount Allocated
FY24	40	$71,240,641
FY25	35	$61,460,319
FY26	42	$50,858,629
FY2024–FY2026	**117**	**$183,559,589**

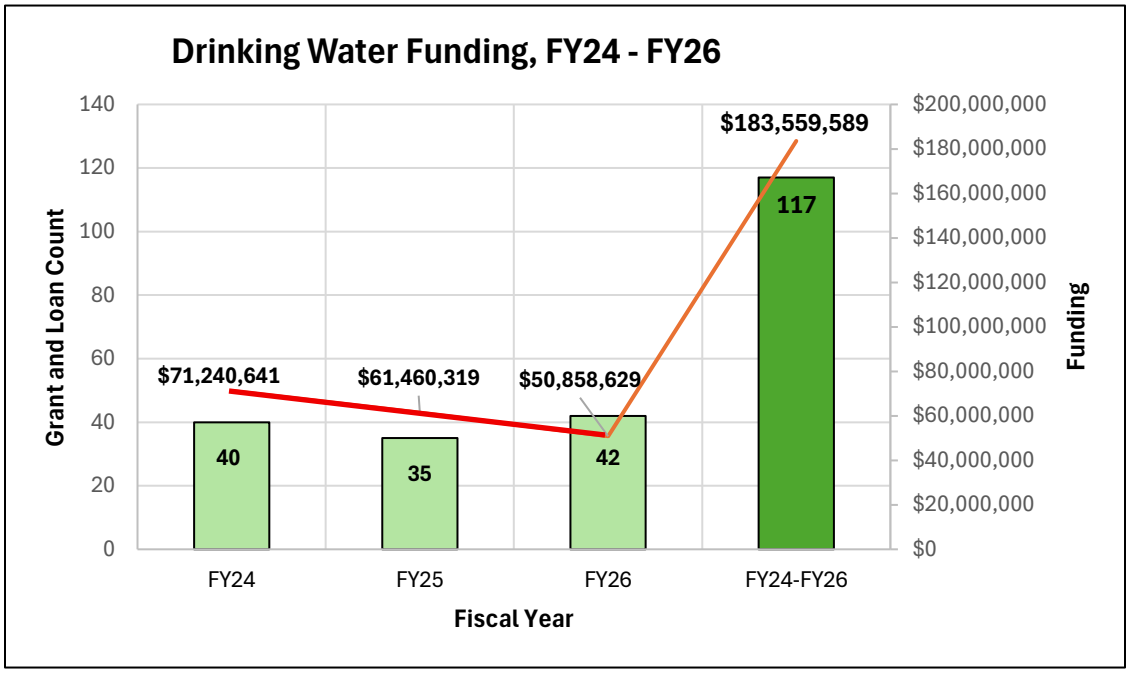


Figure 3. Drinking water grant and loan funding by fiscal year, FY2024–FY2026. Funding awarded by DEQ decreased by approximately $10 million per year during the reporting period. Annual funding levels reflect the availability and timing of federal, state, and other DWSRF and drinking water funding sources.

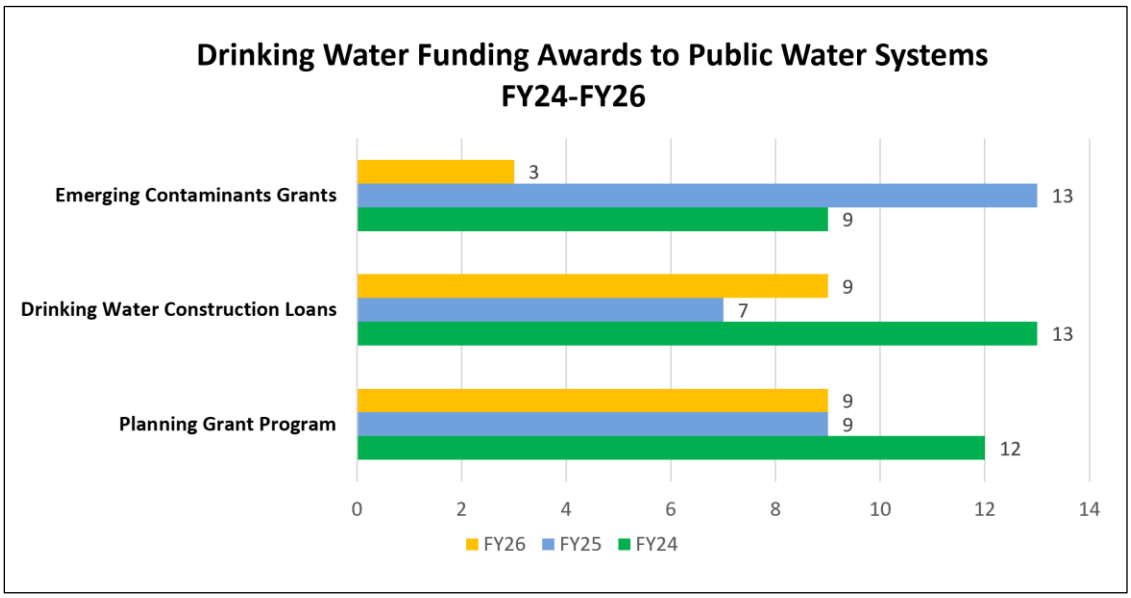


Figure 4. Number of drinking water funding awards by program and fiscal year, FY2024–FY2026.

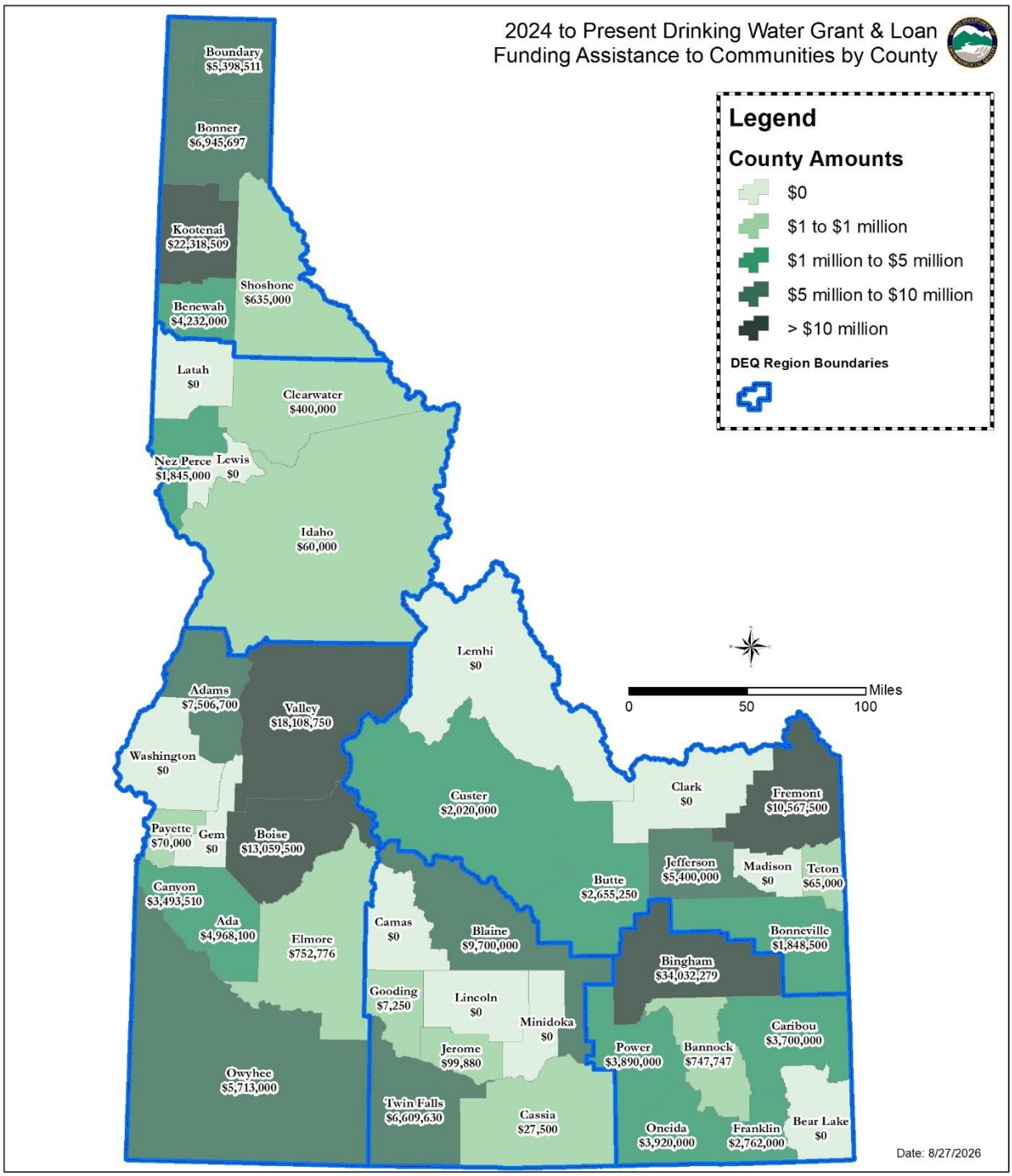


Figure 5. Distribution of drinking water grant and loan funding by county, FY2024–FY2026.

Drinking Water State Revolving Fund—The DWSRF provides financial assistance to eligible PWSs for drinking water infrastructure projects that protect public health and help systems achieve and maintain compliance with the SDWA. DWSRF funds are used to provide loans and other financial assistance to eligible PWSs.

DEQ uses DWSRF loans to assist eligible PWS owners with infrastructure improvements. Interested system owners apply to DEQ for assistance, and loans are made to system owners with the managerial and technical capabilities (or who will achieve these capabilities through the loan project) and can demonstrate need through a competitive ranking process.

Information and solicitation for Letters of Interest are sent annually to PWSs and consulting engineers for planning grants or DWSRF loans with DEQ. Systems that submit Letters of Interest are placed on a priority list for the upcoming fiscal year.

Planning Grants—DEQ's Planning Grant Program assists eligible public drinking water systems with facility planning projects designed to ensure safe and adequate supplies of drinking water. Grants awarded under this program are used to develop engineering reports identifying the most cost-effective, environmentally sound method of upgrading a public drinking water system to achieve and maintain compliance with state and federal standards. Grants cover up to 50% of eligible planning costs, with a matching share funded by local sources.

Capacity Development (CAPDEV) planning grants provide financial assistance for facility planning activities that support the TFM capacity of eligible PWSs. These grants help systems evaluate existing conditions, identify infrastructure needs, consider alternatives, and develop plans for maintaining compliance and long-term system viability.

Governor Little's Leading Idaho initiative provided significant additional funding for Idaho's drinking water and wastewater infrastructure, including FY2024 facility planning grants. LIF funding supplemented available Capacity Development funding and provided additional resources for facility planning during FY2024. During FY2024–FY2026, DEQ awarded 30 drinking water planning grants summarized in Table 5.

Table 5. Drinking water planning grants awarded during FY2021–FY2023.

Fiscal Year	Number of Grants	Funding Source		
		CAPDEV[1]	LIF[2]	Total
2024	12	$10,000	$469,136	$479,136
2025	9	$264,225	$0	$264,225
2026	9	$322,280	$0	$322,280
Total DW Planning Grant Funding FY2024–FY2026				**$1,065,641**

[1] Capacity Development (CAPDEV) funding supports eligible facility planning grants to help PWSs develop the TFM capacity necessary to achieve and maintain compliance with drinking water requirements.
[2] Leading Idaho (LIF) funding has been used in lieu of Capacity Development funding for the majority of facility planning grants during FY2024.

Construction Loans—DEQ's DWSRF provides below-market-rate financing to help eligible PWSs repair, replace, or construct drinking water infrastructure. DEQ's Grants and Loans Bureau awarded 29 drinking water construction loans during FY2024–FY2026, as summarized in Table 6.

Table 6. Summary of drinking water construction loans awarded, FY2024–FY2026.

Funding Type	Fiscal Year	Number of Awards
Drinking Water Construction Loans	FY24	13
Drinking Water Construction Loans	FY25	7
Drinking Water Construction Loans	FY26	9
Total	**FY2024–FY2026**	**29**

Source Water Protection Planning Grants—DEQ's source water protection grants provide funding for projects to protect sources of public drinking water. Eligible activities include those that reduce the risk of contamination of a drinking water source. Projects must contribute to improved protection of one or more public water supply sources. Eligible activities may include contaminant source identification, contaminant pathway removal, contaminant management, pollution prevention, and education and information sharing. DEQ awarded 44 source water protection subgrants totaling $1,274,612 during FY2024–FY2026, as shown in Table 7.

Table 7. Summary of source water protection subgrants awarded, FY2024–FY2026.

Funding Type	Fiscal Year	Number of Awards	Amount Awarded
Source Water Protection Subgrants	FY24	24	$500,000
Source Water Protection Subgrants	FY25	14	$282,001
Source Water Protection Subgrants	FY26	6	$492,611
Total	**FY2024–FY2026**	**44**	**$1,274,612**

Financial and infrastructure assistance supports TFM capacity by providing PWSs with resources to address infrastructure deficiencies, plan for future needs, and maintain reliable drinking water service.

Emerging Contaminants—EPA's Unregulated Contaminant Monitoring Rule (UCMR) requires selected PWSs to monitor contaminants that are not yet subject to federal drinking water standards. UCMR monitoring provides occurrence data used by EPA to evaluate contaminants and inform regulatory and public health actions. UCMR5 required monitoring for 29 PFAS and lithium from 2023 through 2025.

During FY2024–FY2026, DEQ conducted a multiyear evaluation of PFAS in Idaho drinking water sources using voluntary samples from participating PWSs. DEQ also provided financial assistance to address emerging contaminants, including PFAS, manganese, cyanobacteria, and cyanotoxins. During the reporting period, DEQ awarded emerging contaminant funding for projects addressing manganese, cyanotoxins, and PFAS.

4. Efficacy of Idaho's Capacity Development Strategy

This section evaluates the implementation and effectiveness of Idaho's Capacity Development Strategy during FY2024–FY2026. The evaluation considers the strategy's objectives, program

accomplishments, available evidence of effectiveness, successful approaches, lessons learned, and opportunities for continued improvement.

4.1 Strategy Objectives

Idaho's Capacity Development Strategy is intended to help PWSs develop and maintain the TFM capacity necessary to provide safe and reliable drinking water and maintain compliance with applicable requirements. The strategy emphasizes identifying systems with capacity needs, providing technical assistance and training, supporting qualified operators, incorporating capacity considerations into planning and infrastructure investment, and encouraging long-term asset management.

4.2 FY2024–FY2026 Accomplishments

Idaho's Capacity Development Strategy is implemented through regulatory oversight, compliance monitoring, sanitary surveys, technical assistance, operator certification and training, financial assistance, engineering review, and infrastructure planning. During FY2024-FY2026, DEQ continued these activities and expanded or maintained resources available to PWSs which is summarized in Table 8.

Table 8. Major Capacity Development Program activities, FY2024–FY2026.

Activity	FY2024–FY2026 Total
Sanitary surveys	1,239
Technical assistance referrals	125
Sanitary survey CEU certificates	125
Drinking water grants and loans	117
Drinking water funding	$183,559,589
Planning grants	30
Construction loans	29
Source water protection subgrants	44
Source water protection funding	$1,274,612

4.3 Evidence of Effectiveness

These activities demonstrate continued implementation and statewide reach of Idaho's Capacity Development Strategy. The strategy's effectiveness is supported by the integration of compliance information, field assessments, technical assistance, operator resources, planning, and financial assistance. Information from these activities is used to identify system needs and determine appropriate follow-up.

Sanitary surveys provide system-specific information on infrastructure and operations. Compliance monitoring and ETT provide information on regulatory performance. Technical

assistance connects systems with additional expertise, while financial assistance provides resources to address infrastructure and planning needs.

Asset Management—DEQ encourages the development of asset management plans to support long-term infrastructure sustainability, service reliability, and informed financial planning.

Section 2012 in America's Water Infrastructure Act of 2018 required state drinking water programs to include, as appropriate, asset management into their Capacity Development Strategy. Idaho's updated Capacity Development Strategy was approved by EPA in 2022 and encourages PWSs to incorporate asset management into system planning and infrastructure investment.

The Five Core Components of Asset Management are as follows:

1. Current State of Assets
2. Level of Service
3. Critical Assets
4. Minimum Life Cycle Costs
5. Long-Term Funding

DEQ provides asset management resources through the Public Water System Switchboard, including links to asset management guidance and tools. The *SMART Management Financial Tool* assists PWSs in evaluating financial health, including revenues, expenses, assets, liabilities, debt, and reserves. The tool provides information that can support financial planning and evaluation of long-term system needs.

Sanitary surveys also provide an opportunity to evaluate financial and managerial capacity and identify infrastructure and operational needs. PWSs that have implemented, or will implement as part of a proposed project, a formal asset management plan may receive priority points in the DWSRF loan rating process.

4.4 Successful Approaches

DEQ's experience during FY2024–FY2026 indicates that integrating multiple sources of information and assistance is an effective approach to identifying and addressing PWS capacity needs. Compliance information, sanitary surveys, engineering reviews, operator information, facility planning, and financial assistance provide complementary information that can be used to determine appropriate follow-up.

Coordination with DEQ's regional offices, participating PHDs, and third-party technical assistance providers also expands the assistance available to PWSs. Linking capacity development with facility planning and infrastructure funding provides an opportunity to address TFM considerations as systems plan and implement improvements.

4.5 Future Improvements and Priorities

DEQ's experience during FY2024–FY2026 indicates that integrating multiple sources of information and assistance is an effective approach to identifying and addressing PWS capacity needs. Compliance information, sanitary surveys, engineering reviews, operator information, facility planning, and financial assistance provide complementary information that can be used to determine appropriate follow-up.

For the next reporting period, DEQ will continue the following:

- Prioritize PWSs with significant capacity or compliance needs.
- Strengthen technical assistance available to small PWSs.
- Continue operator certification, training, and workforce development.
- Encourage asset management and long-term infrastructure planning.
- Support financial sustainability and access to drinking water funding.
- Maintain coordination with technical assistance partners.
- Improve measurement of Capacity Development outcomes.

These improvements will be pursued within existing Idaho statutory and regulatory authorities and Idaho’s Capacity Development Strategy. Where future improvements would require changes to Idaho requirements, DEQ would use the applicable statutory and IDAPA rulemaking processes.

5 Summary

During FY2024-FY2026, DEQ continued implementation of Idaho's Capacity Development Strategy through compliance monitoring, sanitary surveys, technical assistance, operator certification and training, engineering review, facility planning, financial assistance, source water protection, and other activities that support the TFM capacity of PWSs.

During the reporting period, DEQ and its partners completed 1,239 sanitary surveys, made 125 technical assistance referrals, issued 125 sanitary survey continuing education certificates, and awarded 117 drinking water grants and loans totaling $183,559,589. DEQ also awarded 30 drinking water planning grants, 29 drinking water construction loans, and 44 source water protection subgrants totaling $1,274,612.

These activities demonstrate continued implementation and statewide reach of Idaho's Capacity Development Strategy. DEQ uses compliance information, sanitary survey findings, operator qualifications, engineering reviews, facility planning, and other available information to identify PWS capacity needs and determine appropriate assistance. Coordination with regional offices, PHDs, and third-party technical assistance providers expands the resources available to PWSs, particularly small systems that may have limited staffing, financial resources, or access to specialized expertise.

DEQ also continued to encourage asset management as a component of long-term TFM capacity. Asset management resources, financial planning tools, facility planning, and DWSRF project evaluation provide PWSs with opportunities to consider infrastructure condition, service needs, life-cycle costs, and long-term funding needs.

The FY2024–FY2026 reporting period reinforced the importance of targeted assistance, operator training, technical assistance partnerships, long-term infrastructure planning, and improved measurement of Capacity Development outcomes. For the next reporting period, DEQ will continue to prioritize PWSs with significant capacity or compliance needs, strengthen assistance available to small PWSs, support operator certification and workforce development, encourage asset management and long-term infrastructure planning, maintain technical assistance partnerships, and improve evaluation of program outcomes.

DEQ will continue to implement and evaluate the Capacity Development Program within existing federal and Idaho statutory and regulatory authorities and Idaho's Capacity Development Strategy. Program improvements will be considered as DEQ evaluates system needs, program results, emerging challenges, and opportunities to strengthen TFM capacity and support PWSs in providing safe and reliable drinking water.

This report is available to the public on the DEQ's website at *Capacity Development*.