

**TOWN OF MCADENVILLE COUNCIL AGENDA
TUESDAY, NOVEMBER 12, 2024 @ 6:00 PM
163 MAIN STREET, MCADENVILLE, NC**

- 1. CALL TO ORDER, PLEDGE OF ALLEGIANCE & INVOCATION**
- 2. ADJUSTMENT & APPROVAL OF THE NOVEMBER AGENDA:** Items will only be added or removed upon approval of the Mayor and Town Council.
- 3. CONSENT AGENDA:** The items of the “Consent Agenda” are adopted on a single motion and vote, unless the Mayor or Council wishes to withdraw an item for separate vote and/or discussion:
 - a. Approval of Minutes: Regular Meeting of October 8, 2024.
 - b. Approval of Edy-Mac Plumbing quote to remove and rework main sewer line from rear of Town Hall building to the manhole. Quote includes removal of sidewalk but not replacement. Project cost is \$4,119.50.
- 4. VILLAGE HOA REQUEST FOR ASSISTANCE:** Council direction needed regarding McAdenville Village HOA request for Town Staff’s help with developing enforceable street parking regulations. Results from the initial HOA residential survey with proposed parking regulation options are included for Council review.
- 5. POLICE DEPARTMENT REPORT:** A representative from the Cramerton Police Department will be present to report on police activity for the month of October and address any concerns or questions presented by the Town Council.
- 6. STAFF REPORT:** Lesley Dellinger will provide updates on town business & open projects and answer questions from the Town Council.
- 7. OPPORTUNITY FOR PUBLIC COMMENT:** This is an opportunity for members of the public to present items of interest to the Mayor and Council. This is not a time to respond or take action. Any necessary action will be taken under advisement. Speakers are asked to come to the podium, state their name and address for the record, and limit comments to no more than five (5) minutes.
- 8. COUNCIL GENERAL DISCUSSION:** This is an opportunity for the Mayor and Council to ask questions for clarification, provide information to staff, or place an item on a future agenda.

ADJOURN

TOWN OF MCADENVILLE MINUTES OCTOBER 8, 2024

The McAdenville Town Council met in regular session on Tuesday, October 8, 2024, at 6:00 PM in the Council Chambers of Town Hall located at 163 Main Street, McAdenville N.C.

PRESENT:

Mayor Jim Robinette, Mayor Pro-Tem Reid Washam; Council Members: Carrie Bailey, Greg Richardson, and Joe Rankin. Also in attendance: Attorney Chris Whelchel, CPD Chief Adams, and Town Administrator/Clerk Lesley Dellinger. Council Member Jay McCosh was absent.

CALL TO ORDER:

Mayor Robinette called the meeting to order at 6:00 PM and led in the Pledge of Allegiance. Pastor Walt Griggs, McAdenville Baptist Church, opened the meeting with prayer.

ADJUSTMENT & APPROVAL OF AGENDA:

The October Agenda was approved as presented by motion of Greg Richardson, second by Joe Rankin and unanimous vote

CONSENT AGENDA:

The items of the Consent Agenda were approved by motion of Joe Rankin, second by Mayor Pro-Tem Washam and unanimous vote:

- a) Regular Meeting minutes of September 10, 2024 was approved.
- b) The Sidewalk Levelers contract for \$26,791.50 was approved to repair trip hazards, replace broken panels, and correct ADA compliance issues on sidewalks throughout town. Powell Bill Grant funding will be used to cover the contract.

CONTRACT – ABILITY DEVELOPMENT GROUP, INC:

Staff requested the Council's consideration for an on-call contract with ABDI for technical assistance with updating the current zoning map. David Williams, owner of ABDI, was introduced and provided an overview of his services and credentials. Council was given the opportunity to ask questions. Following discussion, a motion was made by Mayor Pro-Tem Washam to approve the on-call professional service contract with ABDI for planning & development assistance, the motion was seconded by Carrie Bailey and passed unanimously.

PRESENTATION BY KB CREATIVE:

Kirk Brown, owner of KB Creative, was in attendance to present design concepts for a custom Town Seal for McAdenville. Three designs were presented for Council review and input. Staff asked the Council to submit revision recommendations in writing. The design contract includes three rounds of revisions, and final deliverable of selected design in single & full color. A request for volunteers to participate on a design review committee was made by staff.

TOWN CODE AMENDMENT:

Attorney Chris Whelchel presented **Ordinance No 2024-005** for Council's consideration modifying the Town Code Chapter 6-Motor Vehicles & Traffic: Section 6-1(1) Definitions and Rules of Construction, Section 6-4(a), (b) Stop signs Required at Certain Intersections, and Section 6A-5 & 6 Stop Signs. Attorney Whelchel stated that the text changes would certify recent traffic pattern changes and simplify future changes initiated by the Town Council. The proposed text changes were introduced at the August 13th regular meeting and redlined documents were made available to the public on the Town's website. Following discussion, motion to approve **Ordinance No. 2024-005** amending Chapter 6-Motor Vehicles & Traffic of the McAdenville Town Code was made by Carrie Bailey, seconded by Mayor Pro-Tem Washam and passed by unanimous vote.

POLICE DEPARTMENT REPORT:

Police Chief Adams stated that the monthly report was included in the agenda packet and that he didn't have anything additional to report. He then offered to answer questions from the Council. Carrie Bailey asked if traffic citations could be issued for failure to stop at the intersection of Church and Cedar since Council approved the ordinance changes for Chapter 6 of the Town Code. Chief Adams replied yes. No additional comments or questions were presented by Council.

STAFF REPORT:

Town Administrator/Clerk, Lesley Dellinger, reported on the following:

Old Business

- The Town Council voted at the May 14, 2024, meeting to add 3-way stops at the intersections of Church/Cedar Street & Lakeview/Cedar Street and authorized town staff to execute the change. Staff has encountered issues with the proper placement of the signage at the Lakeview/Cedar Street intersection due to the location of the driveway at 523 Lakeview Drive. Staff requested the Council consider a motion to rescind making Lakeview Drive/Cedar Street a 3-way stop due to physical obstacles preventing the proper placement of one of the signs. Photos of the intersection were presented for review. Following discussion, Greg Richardson motioned to rescind making Lakeview Drive/Cedar Street a 3-way stop due to physical obstacles preventing the proper placement of a stop sign at one leg of the intersection. The motion was seconded by Joe Rankin and passed unanimously.

New Business

- Bob Clay has requested Council consideration for endorsement of a future four-way stop at the intersection of Mockingbird Lane & Main St (NC 7) and future road in McAdenville. The NCDOT had provided approval of the traffic pattern change pending support from McAdenville town staff. Mike Holder, on behalf of Pharr Development, spoke to Council about the proposed change during the September 10, 2024 meeting. Staff stated that the technical memorandum and executive overview from Mike Holder, Gannett Fleming Inc., are included in the October agenda packet. Lesley requested

direction from Council on the support letter request by Bob Clay. Joe Rankin stated that he feels Mockingbird needs to be widened at the Main Street connection to accommodate increased traffic and added that Mr. Holder stated at the September meeting that changes to Mockingbird were not part of the traffic study. Councilman Rankin added that he would like a more detailed examination of the intersection before formally supporting the changes. Mayor Pro-Tem Washam stated that a 4-way stop at the proposed intersection is a good idea, but he would like to see site plans detailing the new road additions. He agreed that improvements to Mockingbird need to be included in the design. Additional information was needed before he could support the request. Greg Richardson stated that he would like to have clarification on the time frame for the build-out because he wants to make sure the development coincides with the traffic pattern change. He added that a site plan of the entire area was needed prior to him making a decision for support of traffic pattern changes in the area. Lesley Dellinger was directed to request additional information from the Pharr Development group to facilitate the Council's endorsement of a future road extension and four-way stop at the intersection of Mockingbird Lane and Main St (NC-7).

Water & Sewer

- The Hallie Bentley PRV replacement project bid documents have been prepared by Clayton Engineering. The decision to postpone bidding to 2025 has been made to avoid interference with the Christmas Town Event since construction would be on Main Street between Mockingbird Lane and Park Drive.
- The Water Rehabilitation Project and Water System Improvement projects are still under review by DWI causing bidding to be delayed. Staff was concerned that the grant monies were in jeopardy since the ARP final rule requires that ARP grant monies be committed by December 31, 2024. Confirmation has been received from the NC School of Government that McAdenville's grant awards met the "commitment" requirement when funds were awarded from DWI and are not in jeopardy of being rescinded if contract awards happen after the December 31, 2024 deadline. Project status updates are pending from WithersRavenel.

Public Works

- Recycling update and Waste Collection changes. Letters have been mailed to all resident's outlining the changes to the curbside recycling program and waste collection procedure. The last recycling collection will be on Thursday, October 17, 2024. Residents will be able to use both trash bins for household trash and yard waste for weekly pickup after October 17th. An online survey is available so that residents have an opportunity to provide constructive feedback on the changes. The Town's current contract for solid waste collection ends June 30, 2025. Information from the on-line survey will be used as a tool to help staff develop an RFP for solid waste collection that best serves the majority interest of the citizens.

OPPORTUNITY FOR PUBLIC COMMENT:

Mayor Robinette opened the floor for public comment. No comments were presented.

COUNCIL GENERAL DISCUSSION:

Greg Richardson provided an update on the damage along the river section of the greenway. He stated that the water has opened a vulnerability at the pinch point and volunteers are needed to fill and place sandbags as a temporary fix. He added that the large rectangular stones that are abundant in town could be used to retain and stabilize the remaining riverbank, but that heavy equipment is needed to move them due to their immense weight. He requested staff contact the contractor that was used to reinforce the pinch point area previously for a quote.

Carrie Bailey asked what direction should be provided to residents if they want a new option to be considered for Lakeview since a stop sign was not possible. Lesley stated that they should be referred to the Neighborhood Traffic Calming Policy available on the Town's website. Carrie added that the median on the Academy side of the traffic circle was broken and needs repair. Lesley replied that this item will be added to the list of needed street and sidewalk repairs.

ADJOURN:

There being no further business to come before the board, the meeting adjourned at 7:01 PM upon motion of Joe Rankin, second by Carrie Bailey and unanimous vote.

Reid Washam, Mayor Pro-Tem

Lesley Dellinger, Town Clerk

Edy-Mac Plumbing and Waterproofing Service

PO Box 910

Lowell, NC 28098

Phone: 704-824-1088

Fax: 704-824-5528

Estimate

Date	Estimate #
10/14/2024	10071

Name / Address
Town Of McAdenville 163 Main Street McAdenville NC 28098

			Project
Description	Qty	Rate	Total
Remove sidewalk at rear of building between manhole and rear of building. Replace main sewer line from rear of building to manhole entry. New PVC and fittings. Backfill affected area, seed and straw. NOTE: Does not include replacement of concrete for sidewalk.		3,850.00	3,850.00T
Sales Tax - Gaston County		7.00%	269.50
Total			\$4,119.50


License #: 10336

McAdenville Village Street Parking

From McA HOA President <mcahoa.president@gmail.com>

Date Mon 10/28/2024 10:50 AM

To Lesley Dellinger <clerk@townofmcadenville.org>

 1 attachments (75 KB)

Parking Survey Summarized (1).xlsx;

Good Morning Lesley,

Hope you had a good weekend. The McAdenville Village HOA Board sent out a survey to the community to see what they would like to see happen with street parking in our neighborhood. After hearing from the town attorney, we realized that the rule that is currently in place is unenforceable and something else needs to be done. Town Council had said that we needed to have a vote from the community on what they wanted to see as a street parking policy but the Board and the community didn't want to decide on something and then be told it was unenforceable. So we collected our survey results and would like for Town Council and the town attorney to look at the results and tell us what we could enforce legally. I have attached the results to this email.

Once the town attorney and Town Council decide which options are legally enforceable, the Board will take it back to the community to see if we can get the number of votes needed to pass a street parking regulation.

Would you please distribute this to all parties for review and discussion?

Thank you,

Karen Bynum
McAdenville Village HOA - President
Email: MCAHOA.President@gmail.com

Response Type	Number of Responses
No concerns with parking and no changes desired	27
No street parking at all under any circumstance; tell people to utilize their driveway and other options nearby (pool, church, trail lot, school)	24
No overnight parking allowed but otherwise no restriction	13
Parking allowed as long as it is not blocking driveways or does not make it harder for neighbor to enter and leave home; no permanent vehicles on road	12
Street parking permitted for guests only (short term only); residents to utilize driveways/garages	11
No long term parking, but otherwise permitted for anyone (resident or non-resident)	9
Single side of street parking only (opposite of fire hydrants) at any time	7
No response/did not make sense	5
Street parking permitted for guests only (no specification on time limit); residents to utilize driveways/garages	5
Single side of street parking only (opposite of fire hydrants) during the day; no overnight street parking	3
Street parking only allowed without restriction in front of your own personal home	3
Street parking allowed at any time for anyone as long as parked on side that goes with flow of traffic	3
Single side of street parking (opposite of fire hydrants) during the day for ONLY guests; no overnight street parking	2
Encourage residents to use garages but no actual changes made to rules	2
Street parking allowed as long as there is not another car directly across from yours on the other side of the road	2
No long term parking or overnight parking but otherwise permitted (resident or non-resident)	1
Single side of street parking only (opposite of fire hydrants) for temporary period	1
No policy suggested but in favor of some form of change	1
Street parking allowed anytime aside from when Christmas lights are on in the neighborhood due to safety	1



CRAMERTON POLICE DEPARTMENT
MONTHLY REPORT: October, 2024

McADENVILLE CONTRACT

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTALS
ARREST TOTALS	0	2	3	2	0	3	2	1	0	1			14
Adult	0	2	3	2	0	3	2	1	0	1			14
Juvenile	0	0	0	0	0	0	0	0	0	0			0
Felony	0	0	0	0	0	1	0	0	0	0			1
Misdemeanor	0	2	1	2	0	0	0	0	0	0			5
Traffic	0	0	1	0	0	1	1	0	0	1			4
DWI ARRESTS	0	0	0	0	0	1	1	0	0	1			3
CALLS FOR SERVICE	109	146	201	185	127	125	108	124	124	107			1356
CASE TOTALS	2	3	3	3	0	2	4	1	2	3			23
Felony	0	1	1	0	0	1	2	0	2	0			7
Misdemeanor	2	1	1	3	0	1	2	1	0	3			14
Traffic	0	0	1	0	0	0	0	0	0	0			1
DRUG INVESTIGATIONS	0	0	0	1	0	1	0	0	0	0			2
TRAFFIC CITATIONS	4	12	4	6	6	12	23	5	18	18			108
License Vios.	2	3	1	2	2	7	9	1	6	3			36
Registration Vios.	1	3	2	4	2	2	5	2	6	9			36
Restraint Vios.	0	0	0	0	0	0	0	0	0	0			0
Speeding Vios.	1	4	1	0	2	3	7	1	5	5			29
Sign/Signal Vios.	0	0	0	0	0	0	0	0	0	0			0
Other Traffic	0	2	0	0	0	0	2	1	1	1			7
TRAFFIC CRASHES	2	0	3	0	2	1	2	4	4	0			18
Damage	2	0	3	0	0	1	2	1	4	0			13
Injury	0	0	0	0	2	0	0	3	0	0			5

STAFF REPORT FOR COUNCIL MEETING 11/12/2024

Presented by Lesley Dellinger, Town Administrator/Clerk

Water & Sewer

- Staff is requesting Council's consideration for contracting assistance with performing a water & sewer development fee study that ensures compliance with HB 436. (Studies should be updated every 5 years by a certified engineer to remain in compliance.) System Development Fees serve as the mechanism by which growth can "pay its own way" and minimize the extent to which existing customers must bear the cost of facilities that will be used to serve new customers. A contract option with Raftelis for \$20,132.00 is included for review.
- The EPA's Lead & Copper Rule (LCRR) includes a suite of actions to reduce lead exposure in drinking water. Revisions to the rule in 2021 required all public water systems to develop and submit Service Line Inventory by October 16, 2024. McAdenville staff worked with NC Rural Water to create our Service Line Inventory. Letters outlining the dangers of lead in drinking water are being distributed to all residents whose service lines materials were identified as unknown. Residents that receive a letter are asked to participate in the online water service line survey available on the Town's website. Paper surveys and additional information are available at Town Hall.

Public Works

- The recycling program has been suspended and the new waste collection procedures began Thursday, October 24th. The citizen outreach campaign was successful resulting in only a handful of questions for Town Hall staff. Unfortunately, the resident participation in the online recycling survey has been minimal with only 44 responses. A summary of the survey results will be shared during the meeting.

November 7, 2024

Attn: Lesley Dellinger
Town Administrator
Town of McAdenville

Subject: Engagement Letter – System Development Fees Study

Dear Ms. Dellinger,

Raftelis Financial Consultants, Inc. (Raftelis) is pleased to submit this engagement letter to the Town of McAdenville (Town) to perform a system development fee study. Raftelis is providing this engagement letter to the Town to provide assistance with developing cost-justified system development fees using methodologies consistent with industry standards, and in accordance with the North Carolina HB436 legislature.

System Development Fee Calculation

System development fees serve as the mechanism by which growth can “pay its own way” and minimize the extent to which existing customers must bear the cost of facilities that will be used to serve new customers. Appropriate system development fees must comply with the Rational Nexus test established in court cases. The Rational Nexus test requires that: 1) the need for system development fees is a result of new growth; 2) the amount of the fee does not exceed the reasonable cost to provide capacity to accommodate growth; and, 3) the funds collected must be adequately earmarked for the sufficient benefit of new customers required to pay the fee.

The Town has requested assistance with performing a water and sewer development fee study that ensures compliance with HB 436. There are several methodologies Raftelis can employ to calculate the fees, and which methodology is used depends on the characteristics and dynamics of the Town’s water and sewer system. These methodologies include:

- Buy-in Methodology
- Incremental Cost Methodology
- Combined Cost Methodology

The Buy-In Methodology is most appropriate in cases where the existing system assets currently have extra capacity to provide service to new customers. This approach calculates a fee based upon the proportional cost of each user’s share of existing system capacity. The cost of the facilities is based on fixed assets records and usually includes escalation of the depreciated value of those assets to current dollars. All core assets that provide benefit to the transmission and treatment systems are typically included, such as water treatment plants, water reservoirs (storage tanks), and major water transmission mains.

The Incremental Cost (or Marginal Cost) Methodology focuses on the cost of adding facilities to serve new customers. It is most appropriate in situations where existing facilities do not have

available capacity to provide service to new customers, and the cost for new capacity can be tied to an approved capital improvement plan (“CIP”), or where additional capacity is currently being added and costs can be tied to an on-going construction program.

The Combined Cost approach is used in cases where the existing assets provide some capacity to accommodate new customers, but where the CIP also identifies significant capital investment to add additional infrastructure to address future growth and capacity needs.

Raftelis will develop a model which will provide the functionality to determine the cost basis for the water and sewer system development fees, determine the capacity supported by the cost basis, and ultimately determine a cost per gallon per day for capacity in assets. This cost of capacity per gallon per day will be multiplied by the amount of capacity needed to serve each customer, which becomes the basis for the utility’s fees. We will then work with the Town to determine the best method to scale the fee for your utility. The system development fee can be assessed in various ways. For example, one common approach is to scale the fee by meter size using demand ratios established by the American Water Works Association.

Raftelis will document the study’s process and findings in a letter report that will be made available to the Town for use during a forty-five (45) day public comment period as required by HB 436. Raftelis will document any responses to public comments and will prepare and conduct a presentation regarding the study results to Town and Council.

The project team will meet virtually with Town staff as needed throughout the engagement. Our fee proposal assumes that all meetings will be conducted virtually except the final Council presentation.

Project Staffing and Fees

To assist the Town with this project, we have assembled a team with extensive experience and a reputation for quality service. I will serve as Project Director and be responsible for project deliverables and ensuring that the project is progressing efficiently and meeting the expectations of the Town. Mihaela Coopersmith will serve as the Project Manager. In addition, we have the support of the full resources of Raftelis’ 160+ utility financial and management consultants as needed.

We propose to complete the scope of work outlined above for fees and expenses not-to-exceed \$20,150. These fees reflect the inclusion of a webinar to discuss the preliminary results and one in person meeting to the Town’s staff and Council members.

It is our practice to bill monthly for fees and expenses as they are incurred during a project. The attached work plan provides an estimate of the time required to complete each task and we reserve the right to shift hours among personnel and tasks as circumstances may change during the project. Total fees and expenses will be limited to the not-to-exceed amount unless specific approval for an adjustment in scope is received from the Town. If actual hours incurred are less than the estimated hours in the work plan, then these savings will be passed on to the Town.

If you agree with the requested fees and expenses documented in this letter, please have a designated representative of the Town sign in the space below and return one copy for our files.

Should you have any questions, please do not hesitate to contact me at (704) 936-4441.

Very truly yours,
RAFTELIS FINANCIAL CONSULTANTS, INC.



Melissa Levin
Vice President



Mihaela Coopersmith
Manager

We accept the terms of this Engagement Letter: (please sign and return one original).

_____	_____
Signature	Date
_____	_____
Title	Name of authorized agent

Raftelis is registered with the U.S. Securities Exchange Commission (SEC) and the Municipal Securities Rulemaking Board (MSRB) as a Municipal Advisor. Registration as a Municipal Advisor is a requirement under the Dodd-Frank Wall Street Reform and Consumer Protection Act. All firms that provide financial forecasts that include assumptions about the size, timing, and terms for possible future debt issues, as well as debt issuance support services for specific proposed bond issues, including bond feasibility studies and coverage forecasts, must be registered with the SEC and MSRB to legally provide financial opinions and advice. Raftelis's registration as a Municipal Advisor means our clients can be confident that Raftelis is fully qualified and capable of providing financial advice related to all aspects of utility financial planning in compliance with the applicable regulations of the SEC and the MSRB.

Estimated Work Plan

The following table provides a breakdown of our proposed fee for this project. This table includes the estimated level of effort required for completing each task and the hourly billing rates for our project team members. Expenses include costs associated with travel and a \$10 per hour technology charge covering computers, networks, telephones, postage, etc.

Tasks	Web Meetings	In-person Meetings	Hours					Total Fees & Expenses
			ML	MC	MO	Admin	Total	
1. Project Initiation, Management, and Kick-off Workshop	1			1	1	1	3	\$600
2. System Development Fee Model & Report	0		2	24	48		74	\$17,260
3. High Level Financial Plan and Rate Structure Review	0		0	0	0		0	\$0
4. Presentation	1	1	2	2	4		8	\$2,272
Total Meetings / Hours	2	1	4	27	53	1	85	
Hourly Billing Rate			\$400	\$285	\$185	\$100		
Total Professional Fees			\$1,600	\$7,695	\$9,805	\$100	\$19,200	
							Total Fees	\$19,200
							Total Expenses	\$932
							Total Fees & Expenses	\$20,132

-
ML - Melissa Levin
-
MC - Mihaela Coopersmith
-
MO - Meade Olson
-
Admin - Administration

2021 LCRR Requirements that Are Retained in the Final Lead and Copper Rule Improvements and Compliance Dates

October 2024

This fact sheet describes the requirements of the 2021 Lead and Copper Rule Revisions (LCRR) that EPA did not change in the final Lead and Copper Rule Improvements (LCRI) that systems must comply with starting October 16, 2024¹, clarify what requirements water systems must follow between October 16, 2024 and the LCRI compliance date, and describe the final LCRI compliance date requirements.

When must water systems comply with the LCRI?

Water systems must comply with the requirements of the LCRI three years after the date the final rule is published.

What requirements must water systems comply with between October 16, 2024, and the LCRI compliance date?

The Lead and Copper Rule (LCR) is the National Primary Drinking Water Regulation first promulgated in 1991 that requires actions by public water systems to reduce levels of lead and copper in drinking water. On January 15, 2021, EPA promulgated the LCRR. In October 2024, EPA published the final LCRI to significantly reduce exposure to lead through drinking water. The final LCRI builds on the 2021 LCRR and the original LCR and supersedes the 2021 LCRR.

The LCRI requirements replace most of the 2021 LCRR requirements and requires water systems to continue to comply with the LCR with the exception of certain 2021 LCRR requirements between the 2021 LCRR's October 16, 2024 compliance date and the LCRI compliance date. Specifically, in the LCRI, EPA retains the October 16, 2024 compliance date for the initial service line inventory, notification of service line material, Tier 1 public notification of a lead action level exceedance, and associated reporting requirements as listed in Tables 1 and 2 (water system requirements and State requirements that apply as a condition of primacy, respectively) below for water systems and States², respectively. Table 1 also clarifies the lead health effects language that must be used between October 16, 2024 and the LCRI compliance date. With these limited exceptions, water systems will comply with the LCR (as codified in the July 2020 Code of Federal Regulations) for all other rule provisions and transition directly to the LCRI at the LCRI compliance date.

¹ The 2021 LCRR requirements described are the same as those described in EPA's April 2024 [LCRR Implementation Fact Sheet](#).

² As part of this fact sheet, "State" refers to the agency of the state, Tribal, or territorial government that has jurisdiction over public water systems consistent with the definition of "State" in 40 CFR 141.2. During any period when a state or Tribal government does not have primary enforcement responsibility pursuant to section 1413 of SDWA, the term "State" means the relevant Regional Administrator of EPA.

Table 1: 2021 LCRR Water Systems Requirements Systems Must Comply with October 16, 2024 through the LCRI Compliance Date

System Requirements	Compliance Date	Code of Federal Regulations (CFR) Section
Initial Inventory and Associated Reporting		
Initial inventory development (includes making inventory publicly accessible).	October 16, 2024	40 CFR 141.84(a)(1) through 141.84(a)(10) (excluding 141.84(a)(6) and (a)(7))
Submission of initial inventory to the State	October 16, 2024	40 CFR 141.90(e)(1)
Failure to submit initial inventory to the State by October 16, 2024, requires Tier 3 Public Notification (PN).	Starting October 16, 2024	40 CFR Appendix A to Subpart Q of Part 141 I.C.1 (excludes Tier 3 notification for 141.90 except 141.90(e)(1), (e)(13), and (f)(4))
Notification of Service Line Material and Associated Reporting		
Notification of known or potential service lines containing lead within 30 days of completion of the inventory (initial) and repeat notification on an annual basis until the entire service connection is no longer lead, galvanized requiring replacement, or unknown. For new customers, water systems must also provide the notice at the time of service initiation.	Within 30 days of completion of the inventory and then annually	40 CFR 141.85(e)
Provide revised lead health effects language in public education materials to ensure consistent notification messaging with PN requirements (as referenced in 40 CFR 141.85(e)).	Starting October 16, 2024	40 CFR 141.85(e)(3) requires health information meeting the requirements of 40 CFR 141.85(a)(1)(ii)
Annual reporting to the State by July 1 that the system provided notification and delivered lead service line information materials to affected consumers with lead, galvanized requiring replacement, or unknown service lines for the previous calendar year. Water systems must provide a copy of the notification and information materials to the State.	July 1, 2025, and then annually	40 CFR 141.90(e)(13), 40 CFR 141.90(f)(4)
Failure to certify to the State that the system notified persons served at service connections of a known or potential service line containing lead requires Tier 3 PN.	Starting October 16, 2024	40 CFR Appendix A to Subpart Q of Part 141 I.C.1 (excludes Tier 3 for 141.90 except 141.90(e)(1), (e)(13), and (f)(4))
Other Public Education Materials¹		
Provide 2021 LCRR revised lead health effects language in public education materials (including public education after a lead action level exceedance) to ensure consistent messaging with	Starting October 16, 2024	40 CFR 141.85(a)(1)(ii)

System Requirements	Compliance Date	Code of Federal Regulations (CFR) Section
notification of service line material and PN requirements.		
Public Notification² and Associated Reporting		
Exceedance of the lead action level as specified in § 141.80(c) requires Tier 1 PN provided to persons served by the water system no later than 24 hours after the system learns of the exceedance.	Starting October 16, 2024	40 CFR 141.201(a)(3)(vi) (In Table 1 to § 141.201), 40 CFR 141.202(a)(10) (In Table 1 to § 141.202), 40 CFR Appendix A to Subpart Q of Part 141 C.2
A copy of the Tier 1 PN for lead action level exceedance must be sent to the head of the primacy agency and EPA Administrator no later than 24 hours after the system learns of the exceedance.	Starting October 16, 2024	40 CFR 141.201(c)(3), 40 CFR 141.31(d)(2)
Provide revised lead health effects language as required in Tier 1 PN for lead action level exceedance and Tier 2 and 3 PN for violations.	Starting October 16, 2024	40 CFR Appendix B (D.23) to Subpart Q of Part 141

¹ While discussed in the April 2024 LCRR Implementation Fact Sheet, a row was added to the table to ensure systems know the LCRR health effects language is required starting October 16, 2024 through the LCRI compliance date, upon which the LCRI health effects language is required.

² From October 16, 2024 through the LCRI compliance date, Tier 1 PN is triggered by a lead action level exceedance of 0.015 mg/L. Starting on the LCRI compliance date, Tier 1 PN is required if a system exceeds the new lead action level of 0.010 mg/L.

Table 2: 2021 LCRR State Requirements States Must Comply with October 16, 2024 through the LCRI Compliance Date

State Requirements	Compliance Date	Code of Federal Regulations (CFR) Sections
Initial Inventory and Associated Reporting		
States reporting to EPA: For each public water system, the number of lead, galvanized requiring replacement, and lead status unknown service lines in its distribution system, reported separately.	States receive information in Q4 2024 and report this information by the end of Q1 2025 (3/31/25) for the initial inventory.	40 CFR 142.15(c)(4)(iii)(D)
Quarterly reports to the Administrator include any system violations for failure to submit initial inventory to the State.	States receive information in Q4 2024 and report this information by the end of Q1 2025 (3/31/25) for the initial inventory.	40 CFR 142.15(a)(1)
Notification of Service Line Material and Associated Reporting		
Quarterly reports to the Administrator include any system violations for failure to certify notifications.	States receive information in Q4 2024 report this information	40 CFR 142.15(a)(1)

	by the end of Q1 2025 (3/31/25).	
Public Notification and Associated Reporting		
Quarterly reports to the Administrator include any system violations for failure to conduct Tier 1 PN.	States receive information in Q4 2024 report this information by the end of Q1 2025 (3/31/25).	40 CFR 142.15(a)(1)
Reporting of 90 th percentile lead concentrations where the State calculates a water system's 90 th percentile concentrations: The State provides the results of the 90 th percentile lead calculations, in writing, to the water system within 15 days of the end of the tap sampling period.	Within 15 days of the end of tap sampling periods.	40 CFR 141.90(h)(3)

What are water systems required to submit by the LCRI compliance date?

In addition to preparing to comply with all the LCRI requirements, water systems must submit the following to the State by the LCRI compliance date:

- All water systems must submit a baseline inventory or statement that they have no lead, galvanized requiring replacement or unknown service lines.
- All water systems with at least one lead, galvanized requiring replacement, or unknown service line must submit a service line replacement plan.
- All community water systems must submit a list of the schools and licensed child care facilities they serve or provide certification that they do not serve any.
- If a water system wishes to obtain a waiver from the inventory validation requirements, they must also submit a written request to the State demonstrating that they have conducted an inventory validation that is at least as stringent as the LCRI inventory validation requirements by the LCRI compliance date.

Please see the Service Line Replacement and the Lead in Schools and Child Care Facilities fact sheets for more information about these requirements.

Disclaimer: This document is being provided for informational purposes only to assist members of the public, States, Tribes, and/or public water systems in understanding the Lead and Copper Rule Improvements (LCRI). It includes descriptions of regulatory requirements. In the event that there are any differences, conflicts, or errors between this document and the LCRI, States, Tribes, and/or public water systems should refer to the LCRI. This document does not impose any legally binding requirements on the EPA, States, Tribes, or the regulated community. Further, this document does not confer legal rights or impose legal obligations on any member of the public. In the event of a conflict between the discussion in this fact sheet and any statute or promulgated regulation, the statute and any promulgated regulations are controlling.