NDWAC CCR^3 Working Group Recommendations to the NDWAC

December 1, 2021

Jana Littlewood, Working Group Chair

Session 1.1

EJ and Supporting Underserved Communities (Charge 2)

Charge 2

- EPA seeks advice and recommendations on advancing environmental justice and supporting underserved communities

The Working Group reached consensus on the following recommendations

Charge 2: Recommendation 1

1. The CCR³ WG recommends that the rule recognize the important role of the Primacy Agency in assisting underserved communities. The rule should encourage Primacy Agencies to be engaged in the CCR process for systems serving underserved communities (e.g., systems that are geographically isolated, have economic hardships, or have a lack of access to safe water supply). Examples of ways Primacy Agencies can engage with underserved communities include:
   A. Help ensure accuracy and completeness of compliance information reported in the CCR.
   B. Provide technical assistance to systems in developing their CCRs and understanding the concepts and information in the CCRs.

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Consensus Recommendation

Charge 2: Recommendation 1 *Cont'd*

C. Serve as an alternative resource to water systems and be available to answer questions from customers, including providing informational resources that help customers to read their CCR.

D. Develop guidance documents, support materials, or workshops.

E. Ensure that underserved communities know who their decision-makers are and have contact information for those decision-makers.

Changes to the CCR Rule to address these concerns should:

A. Be flexible.

B. Recommend that Primacy Agencies coordinate responses to the public with the water system.

C. Be accompanied by funding if EPA imposes specific mandates on Primacy Agencies.

Consensus Recommendation

Charge 2: Recommendation 2

2. The rule should improve access to CCRs by renters and non-bill-paying customers. For example, water systems can deliver postcards to every household within that water system (e.g., service addresses and billing addresses) alerting them to the fact that the CCR is available. Postcards should provide easy access to the full report such as by providing a link or QR code that would take customers directly to an online version of the CCR. This could be especially important for low-income customers who do not receive water bills and communications the water system provides through bills.

Consensus Recommendation

Charge 2: Recommendation 3

3. Many underserved communities with limited staffing and financial resources use the CCR iWriter or other templates to generate their CCRs. The rule should encourage Primacy Agencies to make templates available to water systems that would like to use a template. This will reduce the burden of CCR development on water systems that have limited resources.

   A. Templates, including the CCR iWriter, could be improved by providing suggested content if a water system meets certain conditions (e.g., geographically isolated, experiencing drought, experiencing source water problems, etc.).

   B. To supplement templates, EPA should create a guide or toolkit with questions and topics/themes for water systems to consider in developing the CCR. This guide would help water systems think through what and how information should be included. In addition, the guide or toolkit can help water systems assess whether their CCR has been effective at relaying information to their underserved communities.

Consensus Recommendation

The Working Group did not reach consensus on the following recommendations

Charge 2: Non-Consensus Recommendation 1

1. The CCR Rule should encourage water systems to include more information about the overall health of their water system in their CCRs. For example, describing upcoming projects, explaining rate changes, and factors driving the system's financial health.
   A. Arguments in favor of the recommendation:
      i. Gives context to customers for why particular decisions are made.
      ii. Informs customers about their system's water quality challenges and what they can do at the household level.
      iii. Helps customers advocate for themselves.

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Did Not Reach Consensus

Charge 2: Non-Consensus Recommendation 1 *Cont'd*

B. Arguments against the recommendation:

   i. Information unrelated to water quality (primarily financial health) does not belong in CCRs.

   ii. The additional information may not speak to the water system's compliance status or targeted compliance levels.

   iii. Funding and financial health differ between public and private systems – private water systems may not want their system's finances in their CCRs.

Did Not Reach Consensus

Council Questions and Comments on Charge 2

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Session 1.2

CCR Understandability (Charge 3)

Charge 3

- EPA seeks advice and recommendations on improving readability, understandability, clarity, and accuracy of information and risk communication of CCRs

The Working Group reached consensus on the following recommendations

Charge 3: Recommendation 1

1. CCRs could include a summary page to convey important information and key messages upfront in the document in a simple, clear, and concise manner. The summary should use plain language and simple statements. The remaining CCR would walk through the necessary detailed scientific information to elaborate on the high-level messages in the summary. The summary could include information such as:
   A. A value statement that explains why the water system is sending the CCR.
   B. A general description of quality of water and whether the water system is meeting Safe Drinking Water Act Standards.

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Consensus Recommendation

Charge 3: Recommendation 1 *Cont'd*

C. A statement that clarifies where samples were taken to assess water quality; clarifies how water quality changes through the distribution system and in homes; describes how the water system monitors for those water quality problems and actions to protect water quality. The statement should clarify that most samples are not taken in homes and encourage water systems to direct homeowners to resources that can help them address water quality issues related to internal plumbing.

D. Identification of violations, exemptions, and exceedances; description of causes of those violations, exemptions, and exceedances; measures taken by the water system to address those violations, exemptions, and exceedances; what action the water system will take to prevent these violations, exemptions, and exceedances in the future.

E. Discussion of any unique circumstances that affect the water system (drought causing higher concentrations of arsenic in wells, for example). The summary should include enough context to explain causes for the water conditions.

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Consensus Recommendation

Charge 3: Recommendation 1 *Cont'd*

F. Contact information of important resources. For example, contact information can include a member(s) of the Primacy Agency, experts that could provide information on treatment facilities, and technical staff who could conduct home visits. The CCRs could describe additional information that is available, who has expertise in those areas, and who to contact for more information. Some related suggestions included:

   i. Contact information of the Primacy Agency (e.g., name, phone number, email address).

   ii. Contact information for experts at the water system for more information or opportunities which may include treatment facility and laboratory tours, home visits, or similar opportunities offered by the water system.

   iii. Information about other resources available on different topics. These may include documents that provide information about risk management plans, drought response plans, and other similar planning documents.

G. An introductory paragraph or column that provides a table of contents or a discussion on "how to read this document." The purpose of these elements is to help the customer read and understand the information in the CCR.

Consensus Recommendation

Charge 3: Recommendation 2

2. CCRs contain a great deal of highly technical information. CCRs could be improved by developing clear and simple messages, streamlining the document to guide readers through a "story," and avoiding overloading readers with too much information. If readers are interested in learning more, CCRs could link to additional technical information that can be found in other resources. For example, CDC's Agency for Toxic Substances and Disease Registry's (ATSDR) ToxFAQs and additional information provided by the Primacy Agency.

Consensus Recommendation

Charge 3: Recommendation 3

3. CCRs could communicate numbers and standards in a way that is more meaningful to the public. CCRs mainly use three units of measurement (parts per million, parts per billion, and parts per trillion) for several regulated contaminants. These units of measurement may not be meaningful to consumers. The working group recommends strategies to help consumers understand these and other units of measurement and their related risk:
   - A. Real-world examples or analogies of CCR units to help the public understand their scale.
   - B. If using examples or analogies to illustrate units, the same analogy should be used to communicate the comparison of the contaminant level and the public health goal and/or standard. Otherwise, it can be misleading or generally uninformative from the perspective of risk.
   - C. In addition to describing units, the CCR should also clarify the risks associated with contaminant concentrations, making real world comparisons when possible and appropriate. For example, comparing risk levels to risks associated with everyday activities for example, a one in a million risk is equivalent to tossing a coin 20 times and having it land on heads every time.
   - D. CCRs should clarify the meaning of terms and definitions that are related to units of measurement. For example, clarify the meaning of an MCL, how it differs from the MCLG, and why.

Consensus Recommendation

Charge 3: Recommendation 4

4. Readability, understandability, and clarity can be generally improved by encouraging systems to use the following best practices:
   A. Evaluate CCRs using the CDC's Clear Communication Index. CCRs should be set at a reading level and CCI score recommended by EPA. EPA's recommendations should be based on CDC guidance on the CCI.
   B. Use common language that is easy to understand. The rule could reference resources such as the Plain Writing Act. Trainings, examples, and guidelines are available here: Home | plainlanguage.gov.
   C. Use the SALT framework (Strategy, Action, Learning, supported by Tools) as a guide for improving risk communication.

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Consensus Recommendation

Charge 3: Recommendation 4 *Cont'd*

D. Order contaminants in the table in a way that brings the most important issues to the reader's attention (e.g., listing exceedances and violations at the top of the table, remaining contaminants in alphabetical order). Symbols can also be used to convey important information as long as they are easy to interpret and clearly defined.

E. Define terms that are not user friendly (e.g., cross-connection, green sand filter) in ways that are understandable in day-to-day language.

Consensus Recommendation

Charge 3: Recommendation 5

5. CCRs could improve risk communication about the quality of water by:
   A. Including a guide on acute versus chronic issues and the respective risks of each.
   B. Providing information on how the concentrations of drinking water contaminants have changed over time (have they been getting worse or better?). This can help customers understand the general health of the water system.
   C. Including a statement about contaminants that are tested but not detected and providing access to that list upon request.

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Consensus Recommendation

Charge 3: Recommendation 5 *Cont'd*

D. Describing risk related to unregulated contaminants (e.g., PFAS) and if available, provide information about where to find more information about related EPA health advisories.

E. Clarifying what the CCR tells a customer (system-wide water quality) and what it does not (quality of water coming out of tap). It should be clear about what the limitations are for in-house water quality and what could affect water coming out of the tap.

F. Communicating risks that could affect access to a safe drinking water supply in the future and potential protection measures. This may be especially important for geographically isolated communities, water systems with high economic burdens, and/or those that do not have alternative water supplies.

Consensus Recommendation

Charge 3: Recommendation 6

6. Large water systems could help readers identify information most relevant to them by breaking out information by zone or service area.

Consensus Recommendation

Charge 3: Recommendation 7

7. If a CCR has included an inaccuracy (a data error or other type of error), the CCR should be corrected and reissued as quickly as possible, consistent with SDWA requirements. The revised CCR should include information about why it was reissued and what has been corrected.

Consensus Recommendation

Charge 3: Recommendation 8

8. The working group recommends that EPA:
   A. Revise, simplify, and clarify health effects language for contaminant detections at 40 CFR 141.154 and in Appendix A to Subpart O of Part 141, with specific attention to Cryptosporidium, Lead, Arsenic, Nitrate and TTHM. EPA should use available tools such as CDCs CCI to inform the revisions.
   B. Revise, simplify, and clarify required language at 40 CFR 141.153(h)(7). EPA should use available tools such as CDCs CCI to inform the revisions.
   C. Revise, simplify, and clarify definitions at 141.153(c). EPA should use available tools such as CDCs CCI to inform the revisions.
   D. Update all outdated references, such as those at 40 CFR 141.153(d)(4)(v) and 141.154(e).

Consensus Recommendation

Charge 3: Recommendation 9

9. The accuracy of at least the contaminant data in CCRs could be verified by the Primacy Agencies to improve customer confidence. This could be handled by auditing all CCRs or through auditing a random sample of CCRs.

Consensus Recommendation

Charge 3: Recommendation 10

10. The AWIA amendment to the SDWA requires that CCRs directly address corrosion control efforts. In response to this new requirement, the working group recommends that water systems report the following in their CCRs.
    A. For systems that are not required to have corrosion control treatment, the CCR should indicate why no treatment is needed (e.g., the system is monitoring corrosion and knows that corrosion control is not needed). When the system is monitoring corrosion, the CCR should describe those monitoring activities in a clear and concise manner.

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Consensus Recommendation

Charge 3: Recommendation 10 *Cont'd*

B. CCRs should include a concise interpretation of the lead and copper results including:

   i. The total number of service connections in the system and a statement that sample sites are selected based on highest risk and that not all service connections are sampled.

   ii. A description of the corrosion control treatment (CCT) utilized at every system for which corrosion control is required.

   iii. A statement of what the defined Optimum Water Quality Parameters are for the selected CCT in the CCR.

   iv. A description of relevant water quality parameters.

   v. A description of when the lead was detected, what actions the water system took, how long it took to address, and what the system is doing to prevent this from happening again.

EPA should develop example language for each of the situations above. This will support small water systems that may have difficulty developing their own language.

Consensus Recommendation

The Working Group did not reach consensus on the following recommendations

Charge 3: Non-Consensus Recommendation 1

1. CCRs could communicate numbers and standards in a way that is more meaningful to the public.
   A. Consider removing the requirement to convert data into CCR units.
      i. Arguments in favor of the recommendation: Converting data into units for the purpose of the CCR can lead to confusion when people read other information (like lab results) and see other units used. This could lead readers to question whether the information in the CCR is accurate.
      ii. Arguments against the recommendation: Some contaminants cause higher health risks at lower concentrations compared to other contaminants. CCR units help communicate those differences. It is very easy to confuse orders of magnitude when there are several zeroes right of the decimal.

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Did Not Reach Consensus

Charge 3: Non-Consensus Recommendation 1 *Cont'd*

B. CCRs could clarify that legal standards (MCLs) are a compromise between what is an acceptable health risk and what is financially and technically feasible.

   i. Arguments in favor of the recommendation: This clarity will help people understand the context of those terms and what they mean for public health.

   ii. Arguments against the recommendation: The purpose of the CCR is to inform consumers about compliance status. It is not the purpose of the CCR to explain the process of setting MCLs, which can be very complex. Expanding on some of these issues could overly complicate the CCR.

Did Not Reach Consensus

Council Questions and Comments on Charge 3

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Session 1.3

CCR Accessibility (Charge 1)

Charge 1

- EPA seeks advice and recommendations on ways to address accessibility challenges, including:
  - Translating CCRs
  - Meeting Americans with Disabilities Act (ADA) requirements

The Working Group reached consensus on the following recommendations

Charge 1: Recommendation 1

1. CCRs could be improved by following basic accessibility guidelines. Rather than a change to the rule, this recommendation is for EPA to address accessibility through implementation guidance and support. Implementation support could include a suite of tools or resources such as:
    A. Materials that explain the basic features of an “accessible” document.
    B. Guidelines or standards for improving accessibility and making them readily available to water systems. EPA should identify and develop, when appropriate, the most appropriate guidelines. Examples of guidelines and tools include:
        i. The World Wide Web Consortium’s (W3C) Web Accessibility Initiative (WAI) Web Content Accessibility Guidelines (WCAG 2.0).
        ii. Recommendations of available online translation tools and guidelines for developing text that can be easily translated by online translation tools.
        iii. Standards established under Section 508 of The Rehabilitation Act of 1973.
        iv. Usability.gov
        v. Plain Writing Act of 2010. Resources available at: https://www.plainlanguage.gov/guidelines/

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Consensus Recommendation

Charge 1: Recommendation 1 *Cont'd*

C. Basic thresholds of accessibility, such as searchable text in electronic documents, tags, color distinction, alternate text, captions, bookmarks in electronic documents, navigable Table of Contents, etc.

D. EPA audits of a small but representative set of CCRs (of small and large systems) every year to understand adherence to these standards and refine its guidance to water systems and Primacy Agencies based on the audit findings.

Consensus Recommendation

Charge 1: Recommendation 2

2. The specific needs of communities served by water systems vary greatly from water system to water system. Therefore, any guidelines or changes to the rule that address accessibility must allow water systems flexibility to communicate with their customers in a way that is most appropriate and effective.

Consensus Recommendation

Charge 1: Recommendation 3

3. The CCR³ WG recommends that for water systems serving 100,000 or more people, the rule should define “large portion of non-English speaking residents” as a minimum threshold (to be established by EPA) of the population served by the water system speaking the same non-English language. The rule should also give Primacy Agencies the authority to establish a lower threshold or identify other situations in which a translated copy of the CCR is needed or appropriate. Any group speaking a non-English language that meets the threshold should have a high-quality translated copy of the report available to them. The reasons for this approach include:
   A. Providing consistency across the country through the adoption of a national threshold.
   B. Limiting any additional translation requirements to large water systems would avoid potential burdens to small water systems.
   C. Allowing Primacy Agencies to set a lower threshold would allow for flexibility to meet the specific needs of communities in cases when the threshold should be lower.

Consensus Recommendation

Charge 1: Recommendation 4

4. EPA should provide implementation support in the form of translation services for small water systems that may lack the financial resources to pay for translation of their CCR. High quality translation services can be very expensive and a financial burden to small water systems, and this type of support from EPA would help small systems better serve their non-English-speaking populations. At a minimum, EPA should develop translations, as needed, of all required and example language provided in the rule and of any EPA templates.

Consensus Recommendation

Charge 1: Recommendation 5

5. Whenever possible, water systems should enlist a certified translator to develop translated copies of the CCR or evaluate a CCR translated using an online translation tool, when a translated copy is needed. When that is not possible, water systems should develop online versions of CCRs in a format that can be translated using online translation tools. Water systems should use online guides to develop CCRs in a way that improves accuracy of translation tools that may be used on CCRs. Water systems could provide directions to customers on how to use online translation tools. These directions can be provided on the water system's website along with a phone number of a water system contact who could provide assistance with this process.

Consensus Recommendation

Charge 1: Recommendation 6

6. The CCR³ WG developed additional recommendations to improve access to CCRs by non-English speakers. For example:
   A. Require that information about accessing CCRs in another language is placed in a uniform, easily accessible location, such as the front page. This information could be improved by including the name or title of the person to contact at the water system for translation assistance.
   B. Consider/Develop guidance with examples of tools or data sets that could help inform the water system about the composition of water customers in terms of the language they speak (such as Census data on proficiency levels)

Consensus Recommendation

Charge 1: Recommendation 7

7. CCR³ WG members recognized that water systems may have customers with unique needs with respect to accessibility. For example, some customers may need large font copies of the CCR. For these types of needs not addressed by general accessibility guidelines, the CCR³ WG recommends the following revision to the rule (in **bold** text):

   A. 141 CFR 155(e): Each community water system must make its reports available to the public upon request, **make a reasonable attempt to provide the CCR in a format that addresses accessibility issues in the community, and provide an accessible format to anyone who requests accessibility accommodations**.

   EPA should provide guidance to systems about accessible formats and tools that would help systems meet the requirement of “reasonable attempt.”

Consensus Recommendation

Council Questions and Comments on Charge 1

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Session 1.4

CCR Delivery (Charge 4)

Charge 4

- EPA seeks advice and recommendations on CCR delivery manner and methods, including electronic delivery

The Working Group reached consensus on the following recommendations

Charge 4: Recommendation 1

1. CCR³ WG members recommend that if a water system posts its CCR online, the CCR should be posted online for a minimum of 3 years with the intent to comply with the records retention requirements at 40 CFR 141.155(h) to provide customers with more context and history of their system and its changes. This would eliminate the burden of trying to manually search for past information since these CCRs would be in a centralized location. The most current CCR should be prominently displayed to avoid any confusion as to which is the current CCR.

Consensus Recommendation

Charge 4: Recommendation 2

2. The CCR³ WG recommends that EPA reduce the burden on small systems by posting their CCRs online on their behalf (or links to their CCRs). The CCR³ WG also recommends that the rule encourage Primacy Agencies to post their water systems' CCRs on the Primacy Agencies' websites or, at a minimum, post information on the Primacy Agency's website to encourage customers to contact their water systems to review their CCRs.

Consensus Recommendation

Charge 4: Recommendation 3

3. EPA should improve/update its "Find Your Local CCR" webpage. On an annual basis, EPA should update links to the CCRs or to the webpages that host the CCRs. EPA should add additional search terms to help both bill paying and non-bill paying customers find their CCRs.

Consensus Recommendation

Charge 4: Recommendation 4

4. Electronic delivery options outlined in EPA's 2013 memorandum, "Safe Drinking Water Act- Consumer Confidence Report Rule Delivery Options", could be expanded and include the following options:
   A. Deliver CCRs via text message link with the option to opt-out of text deliveries. Working group members noted that younger generations look at their phones quite often and would be more likely to read CCRs if they were delivered via text message.
   B. Electronic CCRs should be developed in formats compatible with smartphones and other types of personal devices (e.g., tablets). In addition, the "direct URL to CCR" requirement in EPA's 2013 memorandum should be clarified to accommodate different online navigation features that could be used to develop an online CCR.

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Consensus Recommendation

Charge 4: Recommendation 4 *Cont'd*

C. Electronic delivery should occur through a trusted means of communication that is acceptable to the customer and water system to minimize cyber security issues (such as phishing or spreading misinformation).

D. The rule should clarify that advertising the availability of the CCRs (such as through social media) should be encouraged but should not be considered a form of "delivery."

Consensus Recommendation

Charge 4: Recommendation 5

5. The rule requires water systems to directly deliver a copy of the CCR to each bill-paying customer. It also requires the system to make a "good faith effort" to reach non-bill-paying customers. The CCR³ WG recommends:

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Consensus Recommendation

Charge 4: Recommendation 5 *Cont'd*

A. The existing language in the rule at 40 CFR 144.155(b) could be expanded to include examples of more modern outreach efforts (such as social media options). The CCR³ WG recommends that modifications (**in bold**) made to the text below.

i. 40 CFR 141.155(b): "*The system must make a good faith effort to reach consumers who do not get water bills, using means recommended by the primacy agency. EPA expects that an adequate good faith effort will be tailored to the consumers who are served by the system but are not bill-paying customers, such as renters or workers. A good faith effort to reach consumers would include a mix of methods appropriate to the particular system such as: Posting the reports on the Internet; mailing to postal patrons in metropolitan* ***areas including mailing postcards or CCRs directly to the service address (in addition to the billing address, as required under the direct delivery requirement); posting a QR code in public places that links directly to the CCR****; advertising the availability of the report in the news media* ***and through direct texts to residents****; publication in a local newspaper; posting in public places such as cafeterias or lunch rooms of public buildings; delivery of multiple copies for distribution by single-biller customers such as apartment buildings or large private employers;* ***providing a direct link to CCRs on water bills****; delivery to community organizations;* ***and holding public forums****."*

Consensus Recommendation

Charge 4: Recommendation 6

6. Water systems could improve their CCRs by gathering input from customers. They could achieve this by providing customers with contact information (such as a phone number) to directly contact their system with feedback regarding the format, readability, accessibility, etc. of the CCR they received. The water system can incorporate input at its discretion. Some examples for soliciting feedback from customers include:
    A. At the bottom of the CCR, the system could include a link or QR code to a survey (which asks the customers questions to understand whether they think the CCR is clear, and accessible) or a quiz/game (which would ask questions about the content of the CCR to give the system a sense as to how much the customer actually understood from the CCR, and therefore how clear and accessible it is).

Consensus Recommendation

Charge 4: Recommendation 7

7. The CCR Rule should be revised to include “standard distribution language” similar to what is included in the Public Notification Rule to encourage broader distribution of the notice, specifically encouraging landlords to provide CCRs to renters (40 CFR 141.205(a)(10) and (d)(3)). EPA could consider this recommendation when developing implementation support (e.g., guidance for landlords, and condominium HOAs).

Consensus Recommendation

Charge 4: Recommendation 8

8. The CCR Rule should encourage water systems to deliver CCRs to local community organizations and to consumers who regularly use the water but do not live within the water system’s service area (e.g., people who work or go to school in a service area that is different from where they live). Water systems could provide a way for local community organizations and consumers to "opt in" to be added to the mailing list to receive CCRs on a regular basis.

Consensus Recommendation

Charge 4: Recommendation 9

9. For biannual CCRs, each CCR should contain the following information to avoid confusion about the information provided in each report:
   A. Include brief language that clarifies that the CCR is a federal requirement and that they must be delivered biannually for systems serving 10,000 or more people.
   B. Specify the time period covered by the specific CCR.
   C. If two identical CCRs are delivered each year, the second report should clearly state that the information contained in the CCR is identical to the information in the first CCR.

Consensus Recommendation

The Working Group did not reach consensus on the following recommendations

Charge 4: Non-Consensus Recommendation 1

1. CCR³ WG members disagreed on the purpose of the biannual CCR delivery. Specifically, the group disagreed on whether the second CCRs should contain the same content as the first or have different content. The group developed two potential recommendations:

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Did Not Reach Consensus

Charge 4: Non-Consensus Recommendation 1
First Option

A. Both CCRs for a given year should contain identical information with the goal of increasing readership of the CCR.

   i. Arguments in favor of the recommendation:

      1. Sending the same CCR twice would reach more customers, particularly new residents of a service area.
      2. Other mechanisms may be used to provide current water quality data to customers more effectively (e.g., public notification, community outreach).
      3. Other resources are available to provide up-to-the-minute data on water quality if customers are interested (e.g., Drinking Water Watch).

   ii. Arguments against the recommendation:

      1. Sending the same report twice would not provide customers with the most up to date information about the quality of their water.
      2. Sending the same report twice may be viewed as a waste of resources.

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Did Not Reach Consensus

Charge 4: Non-Consensus Recommendation 1 *Second Option*

B. CCRs should be issued once every six months and should reflect the most current water sampling data collected by the water system.

   i. Arguments in favor of the recommendation:

      1. This approach would provide customers with the most up to date information about the quality of their water, which they believe is consistent with the intent of the changes in AWIA.

   ii. Arguments against the recommendation:

      1. Delivering two CCRs with different content each year could confuse readers.
      2. It would be a large burden for water systems and Primacy Agencies to develop a CCR "update" every six months.
      3. This approach may be inconsistent with the intent of the AWIA amendments to improve clarity of the CCRs and would not improve access to CCRs relative to the first opinion.

Did Not Reach Consensus

Council Questions and Comments on Charge 4

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Break