



AGENDA NO: 7.d  
MEETING DATE: April 8, 2025

# Staff Report

**TO:** Honorable Mayor and City Council **DATE:** March 20, 2025  
**FROM:** Ryan Luzzi – City Engineer Intern  
Austin Della, PE – Senior Civil Engineer  
Robbie Victor – Lead Utility Operator  
**SUBJECT:** Approval of the Updated Sewer System Management Plan

## RECOMMENDED ACTION

Approve the updated Sewer System Management Plan (SSMP).

## BACKGROUND

In 2006, the State Water Resources Control Board (SWRCB) adopted Order No. 2006-003-DWQ Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (WDR). On June 5, 2023, the State Water Resources Control Board issued Order No. 2022-0103-DWQ: *Statewide General WDR for Wastewater Collection Agencies*. This order requires all California public agencies operating a sanitary sewer system greater than one mile in length to develop and implement a Sewer System Management Plan (SSMP) and update the plan every six years. Failure to recertify the updated SSMP would result in the City being out of compliance with Order No. 2022-0103-DWQ: *Statewide General WDR for Wastewater Collection Agencies*.

The SSMP creates a set of standards and practices designed to minimize sanitary sewer overflows and maintain a reliable sewer system. The goals of the SSMP are to facilitate sewer system management, operation, and maintenance to sustain the infrastructure, protect public health, protect the environment, and achieve compliance with all regulations. The City Council approved the previous SSMP update on June 25, 2019.

The WDR requires the City to conduct periodic internal audits at a minimum of every three years. The audits focus on evaluating the effectiveness of the SSMP and the City’s compliance with the SSMP requirements, including identification of any deficiencies in the SSMP and steps to correct them. Audits have been conducted and completed by staff from the City’s Utilities and Engineering Divisions. Overall, the audits have indicated the City’s SSMP is meeting the requirements of both the SSMP and SWRCB.

## DISCUSSION

The City is using this City Council meeting and the March 19, 2025, Public Works Advisory Board (PWAB) meeting to meet the public input requirement stated within Element XI: Communication Program of the WDR. Element XI of the DWR states that the SSMP must include procedures for the City to communicate with the public for the development, implementation, and update of the SSMP. The City’s SSMP specifies that the SSMP will be presented to PWAB prior to approval by the City

Prepared By: \_\_\_\_\_ RL/AD/RV \_\_\_\_\_ Dept Review: GK  
City Manager Review: \_\_YK\_\_ City Attorney Review: \_RWS\_\_

Council. PWAB and City Council presentations are conducted in an open public format and are also accessible through local public access television channel 20 and virtually.

The SSMP covers the following required sections: Goals and Introduction; Organization; Legal Authority; Operation and Maintenance Program; Design and Performance Provisions; Spill Emergency Response Plan; Sewer Pipe Blockage Control Program; System Evaluation, Capacity Assurance, and Capital Improvements; Monitoring, Measurement, and Program Modification; Internal Audits; and Communication Program.

Staff has completed an updated SSMP in compliance with the WDR. Updates to the City's new SSMP include:

- Reorganization and reformatting of the SSMP to reflect the latest requirements of General Order No. 2022-0103
- Condensed and improved wording for greater clarity
- Updated City staff contact information and responsibility matrix
- Updated list of outside agency contact names and telephone numbers
- Updated sewage spill notification procedures to include Category 4 spills
- Updated equipment inventory
- Updated legal authority in compliance with updated City of Morro Bay Municipal Code
- Updated sewer system asset numbers and data
- Replaced and updated the previous Overflow Emergency Response Plan with the required Spill Emergency Response Plan
- Added a mechanism of reporting any sewage spill in the Bay to the Harbor Department
- Replaced and updated the previous Fats, Oils, and Grease Control Program with the required Sewer Pipe Blockage Control Program
- Updated specifications of capital improvements
- Updated prioritization of specific system areas

The SSMP update has been drafted to comply with the State Water Resources Control Board Order No. 2022-0103-DWQ: *Statewide General WDR for Wastewater Collection Agencies*. Updating and filing the SSMP is self-enforced; therefore, the City maintains all records related to updating the SSMP and its approval by the City Council. Copies are available to regulatory agencies upon request and are publicly available. City staff must self-audit the SSMP triennially.

At their regular meeting on Wednesday, March 19, 2025, the Public Works Advisory Board reviewed the draft SSMP and generally approved of its contents. One comment was made to expand the critical equipment inventory list to include critical control components of the sewer controls system. At this time, staff does not recommend this expansion due to the current controls systems having redundancies. For example, in the event the controls system (Human Machine Interface (HMI) or Operator Interface Terminal (OIT)) fails, local control can be accessed over the SCADA network therefore the equipment can still be operated.

## **ATTACHMENT**

1. Sewer System Management Plan - [Link](#)