

CITY OF SANTA ROSA  
BOARD OF PUBLIC UTILITIES

TO: CHAIR AND BOARD MEMBERS  
FROM: JOE SCHIAVONE, DEPUTY DIRECTOR – WATER AND SEWER  
OPERATIONS  
SUBJECT: RECOMMENDATION TO APPROVE THE RECERTIFICATION OF  
SANTA ROSA WATER’S SEWER SYSTEM MANAGEMENT PLAN  
(SSMP) REQUIRED BY THE STATE WATER RESOURCES  
CONTROL BOARD ORDER NO. 2022-0103

AGENDA ACTION: RESOLUTION

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RECOMMENDATION

It is recommended by Santa Rosa Water that the Board of Public Utilities, by resolution, approve the recertification of the Sewer System Management Plan (SSMP) as required by the State Water Resources Control Board Order No. 2022-0103 Statewide General Waste Discharge Requirements (WDR) for sanitary sewer systems.

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EXECUTIVE SUMMARY

On May 2, 2006, the State Water Resources Control Board (State Water Board) adopted Order No. 2006-0003 Statewide General Waste Discharge Requirements (WDR) for Sanitary Sewer Systems, developing a regulatory mechanism to provide a consistent statewide approach for reducing sanitary sewer overflows (SSOs). The City’s sanitary sewer system is subject to this WDR, which required each agency to create a Sewer System Management Plan (SSMP) to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system to help reduce and prevent SSOs, as well as mitigate any SSOs that do occur.

On December 6, 2022, the State Water Board issued Order No. 2022-0103 requiring additional changes to SSMPs, including requiring SSMPs to be updated and recertified every six years. The SSMP was last updated and certified in April 2019. An updated SSMP must be recertified and submitted to the State by May 1, 2025.

BACKGROUND

1. On May 2, 2006, the State Water Board Order No. 2006-0003– Statewide General WDR for Sanitary Sewer Systems was adopted and implemented.
2. The WDR required each agency to create an SSMP to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer

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system to help reduce and prevent SSOs, as well as mitigate any SSOs that do occur. Under Order No. 2006-0003, SSMPs were required to be recertified every five years.

3. The initial Water Department SSMP was prepared in compliance with WDR requirements, recommended for approval by the Board of Public Utilities and approved by City Council on July 24, 2007. The SSMP was updated and re-certified over the years, with the most recent update and certification approved by the City Council on April 30, 2019. The SSMP was subsequently uploaded into the California Integrated Water Quality System database as required.
4. On April 30, 2019, the City Council delegated authority to the Board of Public Utilities to approve and recertify future updates to the SSMP. Granting the authority is consistent with Section 25 of the Charter of the City of Santa Rosa which grants the Board general policy authority and direction over the management and operation of the City's water and sewer utilities.
5. On December 6, 2022, the State Water Board issued Order No. 2022-0103 (2022 Order) Statewide General WDR for Sanitary Sewer Systems, requiring SSMPs to update the plan to include an improved regulatory mechanism that is a consistent statewide approach for reducing SSOs. In addition, the Order required SSMPs to be updated and recertified every 6 years. The city sanitary sewer system is subject to this WDR and must update and recertify our SSMP by May 1, 2025.

PRIOR BOARD OF PUBLIC UTILITIES REVIEW

On April 17, 2014, the Board of Public Utilities recommended that the City Council approve and certify Santa Rosa Water's SSMP.

On April 19, 2019, the Board of Public Utilities recommended that the City Council approve and certify Santa Rosa Water's SSMP.

ANALYSIS

1. The SSMP identifies three main goals for the management, operation and maintenance of the sanitary sewer system and discusses the role of the SSMP in supporting these goals. These goals include:
  - a. Minimize the number and impact of SSOs;
  - b. Maintain and improve the condition of the sanitary sewer system infrastructure to provide reliable service now and into the future; and
  - c. Cost-effectively minimize infiltration/inflow (I&I) and provide adequate sewer capacity to accommodate design storm flows.
2. Over the last five years, the Water Department has conformed with the goals identified in the SSMP through implementing ongoing maintenance programs and Capital Improvement Plan (CIP) projects as described below:

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- a. *Minimize the number and impact of SSOs:* Santa Rosa Water staff provides emergency response, clean-up, source mitigation and notification follow-up for all SSOs in accordance with the guidelines set forth in the SSMP-Overflow Emergency Response Plan.
  - b. *Maintain and improve the condition of the collection system infrastructure in order to provide reliable service now and into the future:* Santa Rosa Water staff performs regularly scheduled sanitary sewer system maintenance, CCTV inspections, and requests CIP system improvements based on deficiencies noted from CCTV inspection reports and sewer system computer model evaluations.
  - c. *Cost-effectively minimize infiltration/inflow (I&I) and provide adequate sewer capacity to accommodate design storm flows:* Santa Rosa Water staff maintains and utilizes data collected from flow monitors, inspects sources of I&I with the aid of smoke testing and CCTV inspections, and maintains and enforces sanitary sewer system design and construction standards.
3. One of the required elements of the SSMP includes completion of a Triennial audit which is used to determine effectiveness of SSMP elements. In adherence with the 2022 Order, this audit is to take place every three years. Audits review relevant data and trends maintained as part of the SSMP Monitoring and Measurements Program to determine opportunities to improve compliance with SSMP requirements. The 2024 SSMP audit has been completed and the SSMP is continually updated based on the 2022 Order and audit recommendations.

FISCAL IMPACT

Approval of this action does not have a direct fiscal impact on the Wastewater Enterprise Fund.

ENVIRONMENTAL IMPACT

Pursuant to CEQA Guidelines Section 15378, the proposed action is not a "project" subject to the California Environmental Quality Act (CEQA) because it does not have a potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment. In the alternative, the proposed action is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) because it can be seen with certainty that there is no possibility that the project may have a significant effect on the environment.

BOARD/COMMISSION/COMMITTEE REVIEW AND RECOMMENDATIONS

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None.

NOTIFICATION

Not applicable

ATTACHMENTS

- Attachment 1 –Sewer System Management Plan, Revised March 2025
- Attachment 2 – City Council Resolution NO. RES-2019-044
- Resolution

PRESENTER

Joe Schiavone, Deputy Director – Water and Sewer Operations