SEWER SYSTEM MANAGEMENT PLAN

Granada Community Services District

Waste Discharge ID (WDID) 2SSO10138

Updated January 2026

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REVISION DATE	SSMP SECTION	APPROVAL DATE	DESCRIPTION OF CHANGE/REVISION MADE	INITIALS

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FIGURES

INTRODUCTION

This Sewer System Management Plan (SSMP) or "Plan" has been prepared by the Granada Community Services District (GCSD) in compliance with the requirements of the State Water Resources Control Board (SWRCB) 2022 General Waste Discharge Requirement (WDR), Order No. WQ 2022-0103-DWQ for Sanitary Systems. The Plan serves as a living document that supports ongoing sewer system management program activities, procedures, and decision-making for GCSD. The Plan has been developed to meet the size, scale, and complexity of GCSD's specific sanitary sewer system. The District utilized the Bay Area Clean Water Agencies (BACWA) 2024 Sewer System Management Plan Guidance Manual as a model in developing this Plan.

Figure 1.1 provides spill metrics, including data comparing the District's spill record with state and regional system data from April 2021 through April 2026.

Figure 1.1 - Collection Spill Summary

General Information

Region	Place ID	Place Name	CS Category	Place Address	Place County
2	630886	Granada Community Services District CS	Municipal(Public)	504 Alhambra El Granada CA 94018	San Mateo

Collection System Spill Summary

Operational Indices: Granada Community Services District CS

Spill Rate Index (spills/100mi/yr)							
	Category 1			Category 2		Category 3	
	Main System	Laterals	Other	Main System	Other	Main System	Other
Granada Community Services District CS	0.0	N/A	0.0	0.0	0.0	1.11	0.0
State Municipal(Public) Average	1.53	N/A	1.1	0.99	1.25	2.11	0.44
Region Municipal Average	2.49	N/A	0.72	0.75	0.06	3.03	0.5

Net Volume Spills Indice (gallons/1000 Capita/yr)							
	Category 1			Category 2		Category 3	
	Main System	Laterals	Other	Main System	Other	Main System	Other
Granada Community Services District CS	0.0	N/A	0.0	0.0	0.0	0.79	0.0
State Municipal(Public) Average	3529.93	N/A	2191.58	252.93	1041.21	50.95	22.93
Region Municipal Average	-5445.65	N/A	1436.95	95.54	0.94	103.37	80.9

SSMP Organization

This Plan is organized into 11 core elements as required by the WDR and within those elements, the following technical contents are contained:

1. Requirements – Concise description of applicable WDR requirements.
2. Compliance – Description of District approach for demonstrated compliance.
3. Implementation – Description of steps to be taken by District to meet requirements.
4. Effectiveness – Key performance indicators that demonstrate how District's plans and processes are working and achieving desired results.
5. Resilience – Demonstrates programs and processes that strengthen District's ability to avoid violations and spills.

LIST OF ACROYNYMS

BACWA	Bay Area Clean Water Agencies
CCTV	Closed-Circuit Television
CIP	Capital Improvement Plan
CIWQS	California Integrated Water Quality System
CMMS	Computerized Maintenance Management System
DISTRICT	Granada Community Services District
FOG	Fats, Oils and Grease
GIS	Geographical Information System
GCSD	Granada Community Services District
I&I	Inflow & Infiltration
JPA	Joint Powers Agency
LRO	Legally Responsible Official
NPDES	National Pollution Discharge Elimination System
PACP	Pipeline Assessment and Certification Program
RWQCB	Regional Water Quality Control Board
SAM	Sewer Authority Mid-Coastside
SERP	Spill Emergency Response Plan
SSMP	Sewer System Management Plan
SSO	Sanitary Sewer Overflow
SWRCB	State Water Resources Control Board
WDID	Waste Discharge ID Number
WDR	General Waste Discharge Requirements
WWTP	Wastewater Treatment Plant

LIST OF TERMS

Bay Area Clean Water Agencies (BACWA) – Association comprised of Bay Area wastewater treatment and collection system agencies. BACWA represents the interests of public wastewater agencies in regulatory matters and to support the exchange of information.

Website: http://www.bacwa.org

Blockage – An object that partially or fully hinders flow through a sewer pipeline. The blockage can be caused by debris in the sewer, grease buildup, root intrusion, or a partial or full collapse of the pipeline. Also known as a stoppage.

California Integrated Water Quality System (CIWQS) – A computer system used by the State and Regional Water Quality Control Boards to track information about SSOs, among other information. CIWQS is the tool used for online submittal of SSO details, which are then made available to the public. Website: http://www.swrcb.ca.gov/ciwqs/

Enrollee – The legal public entity that owns a sanitary sewer system, as defined by the Statewide WDR. Also known as a sewer system agency or wastewater collection system agency.

Geographical Information System (GIS) – A database linked with mapping that records sewer system information. The GIS database could include sewer features such as pipe location, diameter, material, condition, or last date cleaned or repaired. GIS maps also typically contain base information such as streets and parcels.

Governing Board – Board of Directors for Granada Community Services District

Infiltration – The seepage of groundwater into a sewer system, including service connections. Seepage frequently occurs through defective or cracked pipes, pipe joints, connections or manhole walls and joints.

Inflow – Water discharged into a sewer system from such sources as roof leaders, cellars, yard and area drains, foundation drains, through holes in manhole covers, cross connections from the storm system or street wash waters. Inflow differs from infiltration in that it is a direct discharge into the sewer rather than a leak through defects in the sewer.

Lateral or Private Lateral – The privately-owned sewer pipeline that conveys wastewater from the premises of a user to the District's sewer system. The upper lateral extends from the building to property line (or easement line). The lower lateral extends from the property or easement line to the connection to the pipe.

Monitoring and Reporting Program - The program used by the District to monitor, maintain records, report issues and complete needed public notifications.

Preventive Maintenance (PM) – Regularly scheduled servicing of machinery, infrastructure or other equipment using appropriate tools, tests, and lubricants.

Rehabilitation and Replacement Plan (also referred to as a Capital Improvement Plan) – Identifies and prioritizes system deficiencies and implements short-term and long-term rehabilitation actions to address each deficiency.

San Francisco Bay Regional Water Quality Control Board – Also known as Region 2 or RWQCB. This regulatory agency preserves, enhances and restores the quality of California's water resources, and ensures their proper allocation and efficient use for the benefit of present and future generations. Website: http://www.waterboards.ca.gov/sanfranciscobay

Sanitary Sewer Overflow (SSO) – Any overflow, spill, release, discharge or diversion of untreated or partially treated wastewater from a sanitary sewer system, including overflows or releases that reach waters of the United States, overflows or releases that *do not* reach water of the United States, and backups into buildings and/or private property caused by conditions within the publicly owned portion of the sewer system.

Sanitary Sewer System – Any system of pipes, pump stations, sewer lines, or other conveyances, upstream of a wastewater treatment plant headworks used to collect and convey wastewater to the wastewater treatment plant.

Satellite Collection System – The portion, if any, of a sanitary sewer system that is owned or operated by a different public agency or user.

Sewer Pipe Blockage Control Program –Program implemented by the agency, based on the identified causes of sewer overflows, to control fats, oils, grease, rags and debris in the sewer system.

Sewer System Management Plan – A series of written programs that address how a collection system owner/operator conducts daily business. Each SSMP is unique for an individual discharger. The plan includes provisions to provide proper and efficient management, operation, and maintenance of sanitary sewer systems, while taking into consideration risk management and cost benefit.

Spill Emergency Response Plan – This document identifies measures that are needed to respond to sanitary sewer overflows in a way that maximizes the protection of public health and the environment.

State Water Resources Control Board – Also called the State Board. This agency developed and passed the Statewide Waste Discharge Requirements for collection systems and maintains the SSO reporting web site.

Statewide Waste Discharge Requirements – The Statewide General Waste Discharge Requirements for Sanitary Sewer Systems was adopted by the SWRCB in 2022 to provide a structure and guidance for SSMP development. Also known as Order No. WQ 2022-0103-DWQ.

Wastewater Collection System – See Sanitary Sewer System.

1. Goal and Introduction

REQUIREMENTS

Att. D-1(pg. D-2)

"The goals of the Sewer System Management Plan (Plan) is to provide a plan and schedule to: (1) properly manage, operate, and maintain all parts of the Enrollee's sanitary sewer system(s), and (2) reduce and prevent spills, and (3) contain and mitigate spills that do occur.

The Plan must include a narrative Introduction section that discusses the following items (see below)."

1.1. Regulatory Context

REQUIREMENTS

Att.D-1.1 (pg. D-2)

"The Plan Introduction section must provide a general description of the local sewer system management program and discuss Plan implementation and updates."

COMPLIANCE

The District is committed to fully implementing the WDR by addressing its included requirements and continuing to incorporate programs and processes to ensure the integrity and efficiency of the District's sanitary sewer collection system. The District is further committed to the ongoing maintenance of its collection system in order to reduce the potential for, frequency of, and the impacts of sewer spills if and when they do occur. The District's programs include CCTV, pipe cleaning, manhole inspections, and lift station maintenance. These programs are described in more detail in Element 4, Operation and Maintenance Program. The District's attention to proactively cleaning, monitoring, and rehabilitating its collection system has ensured ongoing effective operation of its sanitary sewer system, low spill rates, and ongoing compliance with the WDR.

EFFECTIVENESS

N/A

IMPLEMENTATION PLAN/SCHEDULE

N/A

1.2. SSMP Update Schedule

REQUIREMENTS

Att. D-1.2 (pg. D-3)

"The Plan Introduction section must include a schedule for the Enrollee to update the Plan, including the schedule for conducting internal audits. The Schedule must include milestones for incorporation of activities addressing prevention of sewer spills."

COMPLIANCE

The District utilizes the State Water Board's online lookup tool to ensure compliance with due dates for the SSMP Audits and SSMP Reports (see chart below).

The District's most recent SSMP Audit was completed for the period May 2022 through May 2025 and can be found in the Appendix for Element 1.

The District contracts with the Sewer Authority Mid-Coastside (SAM) to clean the gravity collection system and to operate and maintain the pump stations under the terms of an operating and maintenance contract. That contract is linked in the appendix of Element 1. The District, with SAM, maintains a 24-month target (2 years) for cleaning of all pipes up to 18 inches in diameter. More frequent cleaning occurs in areas known to need additional attention. This cleaning schedule is documented through SAM's CMMS system (Lucity) and cleaning maps are shared with the District monthly.

Figure 1.2 – Sewer System Management Plan, Subsequent Update and Audit Dates

Sewer System Management Plan & Audit Required Due Dates
Transition from General Order 2006-0003-DWQ to Reissued General Order

Search by Waste Discharge Identification (WDID) Number

Enter your Waste Discharge Identification (WDID) number in the search field to retrieve the required Sewer System Management Plan (SSMP) Update and Audit due dates for your system.

2SSO10138

Show Update/Audit Dates

Sewer System Management Plan & Subsequent Update Due Dates

System Name	WDID Number	Original Plan Required Due Date	Required Plan Update Due Date	Required Plan Update Due Date	Required Plan Update Due Date*
Granada Community Services District CS	2SSO10138	5/2/2010	5/2/2015	5/2/2020	5/2/2026

Audit Due Dates

System Name	WDID Number	Original Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	End of Required 3-Year Audit Period**
Granada Community Services District CS	2SSO10138	5/2/2012	5/2/2014	5/2/2016	5/2/2018	5/2/2020	5/2/2022	5/2/2025

* Per Section 5.5 and Attachment E1, Section 3.11 of the General Order, Plan updates are due within six years after the required due date of the Enrollee's last Plan Update.

** Per Section 5.4 and Attachment E1, Section 3.10 of the General Order, the Audit Report is due within six months after the end of the required 3-year audit period.

EFFECTIVENESS

Key Performance Indicators

1. Are SSMP Audits and SSMP Updates being performed as scheduled?
2. Has the SSMP been approved by the governing board on schedule?
3. Are specific internal sewer program milestones being monitored?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
1.2.1	Prepare for next Sewer System Management Plan Update	Start 8/1/2031 – DUE by 5/2/2032	X	X	X
1.2.2	Prepare for next SSMP Audit	Begin 5/2/2028	X		X
1.2.3	Complete and upload next SSMP Audit	By 11/2/2028	X		X
1.2.4	Incorporate Audit Findings, update Change Log and Update SSMP	By 5/2/2026	X		X
1.2.5	Board Approval and LRO Certification of SSMP	By 5/2/2026	X		

1.3. Sewer System Asset Overview

REQUIREMENTS

Att. D-1.3 (pg. D-3)

"The Plan Introduction section must provide a description of the Enrollee-owned assets and service area, including but not limited to:

- *Location, including county;*
- *Service area boundary;*
- *Population and community served;*
- *System size, including total length in miles, length of gravity mainlines, length of pressurized (force) mains, and number of pump stations and siphons;*
- *Structures diverting stormwater to the sewer system*
- *Data management systems;*
- *Sewer system ownership and operation responsibilities between Enrollee and private entities for upper and lower sewer laterals;*
- *Estimated number or percent of residential, commercial, and industrial service connections; and*
- *Unique service boundary conditions and challenge(s)*

Additionally, the Plan Introduction section must provide reference to the Enrollee's up-to-date map of its sanitary sewer system, as required in section 4.1 (Updated Map of Sanitary Sewer System) of this Attachment."

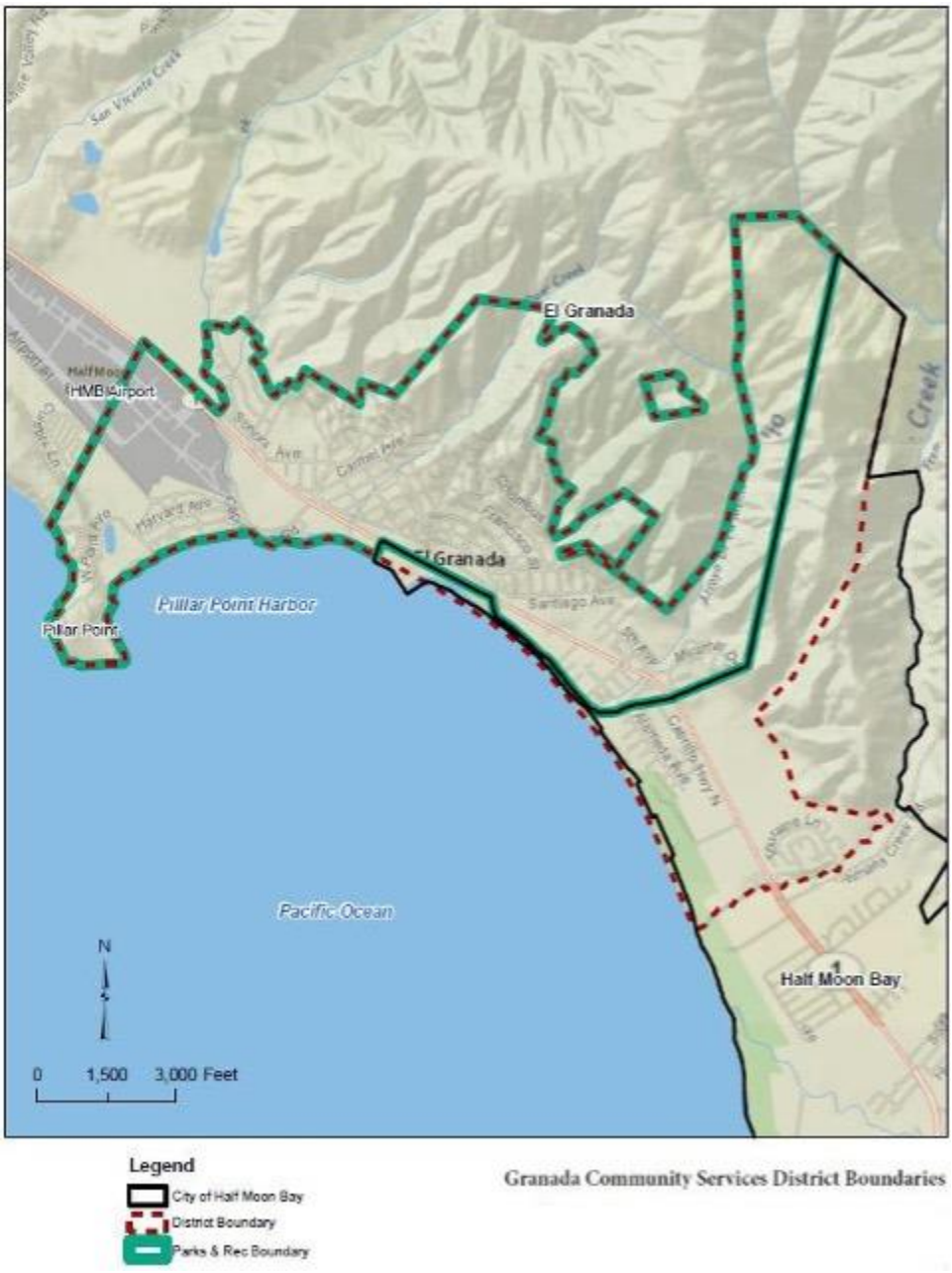
COMPLIANCE

The Granada Community Services District is located in San Mateo County and serves a population of approximately 7,000 through 2,640 service connections that consist of 141 commercial connections and 2,499 residential connections. The Granada Community Services District was formed as "Granada Sanitary District" in 1958 under the California Sanitary District Act of 1923. In October of 2014, the District was reorganized as the Granada Community Services District under California Government Code 61000 et seq. The District is governed by a five-member governing board elected to four-year terms through an at-large election system. Additionally, the District is a participant in the Sewer Authority Mid-Coastside (SAM), which is a Joint Powers Agency (JPA) comprised of the District, City of Half Moon Bay, and Montara Water and Sanitary District. The JPA was formed in 1976 through the execution of an Exercise of Joint Powers Agreement, which is included in the Appendix for Element 1. The District contracts separately with SAM for collection system cleaning services.

The District is responsible for the sewage collection system and wastewater disposal in El Granada, Princeton, Princeton-by-the-Sea, Clipper Ridge, and Miramar, as well as the northern portion of the City of Half Moon Bay as shown by the red dashed border in Figure 1.3 below. Sewage is conveyed to the SAM wastewater treatment plant

(WWTP), located near Kehoe Avenue in Half Moon Bay.

Figure 1.3 – Granada Community Services District Sewer Service Area



The District's wastewater collection system includes approximately 35 miles of gravity sewer pipe, 1 mile of force main pipeline, and 1 pump station. The District's system conveys approximately 220,000 gallons per day of average dry weather flow to the SAM WWTP.

An up-to-date GIS mapping system of the District's system shows all gravity line segments, manholes, pumping facilities, pressure pipes and valves and is used to track service call outs when they occur. The District maps are updated as needed by the District's mapping consultant. The District is pursuing additional features to its GIS system to enable CCTV uploads and video storage. The District has provided the up-to-date map of the Sanitary Sewer System to the State and Regional Water Board per Section 4.1 of WDR Attachment D. Figure 1.4 on the next page shows the mapped assets.

The District's sewer system layout is additionally stored in SAM's GIS and is available to the SAM collections staff via the Lucity computerized maintenance management system (CMMS) that is shared among the SAM member agencies. The system maps include pipes including pipe lengths, diameters, and approximate year installed, and manholes including most pipe inverts.

The District does not have any structures that divert stormwater into the sewer system and the sewer maps do not include storm drain facilities. The County of San Mateo is responsible for maintaining the storm drain system including mapping.

Figure 1.4 – GCSD Sewer Pipelines

EFFECTIVENESS

Key Performance Indicators

1. Are assets reviewed and updated as needed?
2. Are systems up to date?
3. Is new data, including video, service calls and CCTV footage being uploaded to GIS systems in a timely manner?
4. Is information consistently communicated between District and SAM?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
1.3.1	Review of District assets and service connections	Annually in July/August			X
1.3.2	Update maps in GIS system	Annually in August or within 30 days of completed development.		X	X
1.2.3	Upload CCTV footage, service call outs	Within 30 days of receipt.		X	X

RESILIENCE

Resilience for Element 1.3 is addressed by:

- Following standardized procedure for collection and management of asset data.
- Redundancy: Multiple staff members are trained and able to manage data.
- Using calendar reminders to ensure scheduled updates are executed.

APPENDIX ELEMENT 1 INCLUSIONS

- Sewer Service Management Plan Audit for period of May 2022 through May 2025.
- Collections, Operation and Maintenance Contract with Sewer Authority Mid-Coastside.
- Sewer Authority Mid-Coastside Exercise of Joint Powers Agreement (JPA).
- GCSD Sewer Budget FY25/26.

Specifications 5.2 – SSMP Development and Implementation

REQUIREMENTS

Specification 5.2 (pg. 18)

"To facilitate adequate local funding and management of its sanitary sewer system(s) the Enrollee shall develop and implement an updated Sewer System Management Plan. The scale and complexity of the Sewer System Management Plan, and specific elements of the Plan, must match the size, scale, and complexity of the Enrollee's sanitary sewer system(s). The Sewer System Management Plan must address, at a. minimum, the required Plan elements in Attachment D (Sewer System Management Plan – Required Elements) of this General Order. To be effective, the Sewer System Management Plan must include procedures for the management, operation, and maintenance of the sanitary sewer system(s). The procedures must: (1) incorporate the prioritization of system repairs and maintenance to proactively prevent spills, and (2) address the implementation of current standard industry practices through available equipment, technologies, and strategies."

COMPLIANCE

The District's SSMP has been updated to comply with the requirements of Order WQ 2022-0103-DWQ and to address all required Elements. The Plan matches the size, scale and complexity of the District's sanitary sewer system. The Plan outlines procedures for management as well as proactive operation and maintenance of the District's sanitary sewer system to identify deficiencies which are then identified for future rehabilitation, repair, or increased maintenance.

District staff and contracted SAM Collections staff stay current on industry standards and best practices and work collaboratively to ensure updated industry knowledge is shared.

Specifications 5.7 – Allocation of Resources

REQUIREMENTS

Specification 5.7 (pg. 22)

"The Enrollee shall:

- Establish and maintain a means to manage all necessary revenues and expenditures related to the sanitary sewer system; and
- *Allocate the necessary resources to its sewer system management program for:*
  - *Compliance with this General Order,*
  - *Full implementation of its updated Sewer System Management Plan,*
  - *System operation, maintenance, and repair, and*
  - *Spill responses."*

COMPLIANCE

The Granada Community Services District is an independent special district that maintains staffing for administration and management of the sanitary sewer system. The District contracts with SAM to provide cleaning, and operations and maintenance of the District's collection system and pump station.

The District prepares an annual sewer budget and allocates funds for operations, repair, maintenance, and as-needed replacement of collection system assets. The District also funds its share of SAM WWTP operations, maintenance, and replacements. In FY 25/26, the District allocated funding of $2,893,900 for annual operations and maintenance and $450,000 for capital projects. Funding is provided through sewer services charges that are collected from all parcels receiving sewer service within the district, and charges are collected on the County property tax roll. The portion of the budget that relates to sewer service is included in the appendix for Element 1.

Provisions 6.1 – Enforcement Provisions

REQUIREMENTS

Provisions 6.1 (pg. 27)

"The following enforcement provisions are based on existing federal and state regulations, laws and policies, including the federal Clean Water Act, the state Water Code and the State Water Board Enforcement Policy."

COMPLIANCE

Noncompliance with requirements of this General Order or discharging sewage without enrolling in this General Order constitutes a violation of the Water Code and a violation of the Clean Water Act and is grounds for an enforcement action by the State Water Board or the applicable Regional Water Board. Failure to comply with the notification, monitoring, inspection, entry, reporting, and recordkeeping requirements may subject the District to administrative civil liabilities of up to $10,000 a day per violation pursuant to Water Code section 13385; up to $1,000 a day per violation pursuant to Water Code section 13268; or referral to the Attorney General for judicial civil enforcement. Discharging waste not in compliance with the requirements of this General Order or the Clean Water Act may subject the City to administrative civil liabilities up to $10,000 a day per violation and additional liability up to $10 per gallon of discharge not cleaned up after the first 1,000 gallons of discharge; up to $5,000 a day per violation pursuant to Water Code section 13350 or up to $20 per gallon of waste discharged; or referral to the attorney General for judicial civil enforcement.

Provisions 6.3 – Sewer System Management Plan Availability

REQUIREMENTS

Provisions 6.3 (pg. 31)

"The Enrollee's updated Sewers System Management Plan must be maintained for public inspection at the Enrollee's offices and facilities and must be available to the public through CIWQS and/or on the Enrollee's website, in accordance with section 3.8 (Sewer System Management Plan Reporting Requirements) of Attachment E1 (Notification, Monitoring, Reporting and Recordkeeping Requirement) of this General Order."

COMPLIANCE

The District's SSMP is available for public review on the District's website on the main Sewer Page and is also available for in person review at the District Office located at 504 Avenue Alhambra, 3rd Floor during regular business hours.

2. Organization

REQUIREMENTS

Att. D-2 (pg. D-3)

"The Plan must identify organizational staffing responsible and integral for implementing the local Sewer System Management Plan through an organization chart or similar narrative documentation that includes:

- *The name of the Legally Responsible Official as required in section 5.1(Designation of a Legally Responsible Official) of this General Order;*
- *The position titles, telephone numbers, and email addresses for management, administrative, and maintenance positions responsible for implementing specific Sewer System Management Plan Elements;*
- *Organizational lines of authority; and*
- *Chain of communication for reporting spills from receipt of complaint or other information, including the person responsible for reporting spills to the State and Regional Water Boards and other agencies, as applicable. (For example, county health officer, county environmental health agency, and State Office of Emergency Services.)"*

COMPLIANCE

The above requirements are addressed in order below.

2.1. Legally Responsible Officials

The District's Legally Responsible Officials are the General Manager, Chuck Duffy and Assistant General Manager, Hope Atmore. Both people meet the requirements defined in Specification 5.1 of the WDR.

2.2. SSMP IMPLEMENTATION RESPONSIBILITIES

SSMP Element	Responsible Position
1. SSMP Plan, Goal and Introduction	GM/AGM
1.1 Regulatory Context	GM/AGM
1.2 SSMP Update Schedule	GM/AGM
1.3 Sewer System Asset Overview	GM/AGM/District Engineer
2. Organization	GM/AGM/District Board
3. Legal Authority	GM/Legal Counsel/District Board
4. Operation and Maintenance Program	GM/AGM/SAM (contract)
4.1 Updated Maps of Sanitary Sewer System	AGM/District Engineer
4.2 Preventive Operation and Maintenance Activities	GM/AGM/SAM (contract)
4.3 Training	GM/AGM/SAM (contract)
4.4 Equipment Inventory	GM/AGM/SAM (contract)
5. Design and Performance Provisions	GM/District Engineer
5.1 Updated Design Criteria and Construction Standards and Specs.	GM/District Engineer
5.2 Procedures and Standards	GM/District Engineer
6. Spill Emergency Response Plan	GM/AGM/SAM (contract)
7. Sewer Pipe Blockage Control Program	GM/AGM/SAM (contract)
8. System Evaluation, Capacity Assurance and Capital Improvements	GM/AGM/District Engineer
8.1 System Evaluation and Condition Assessment	GM/AGM/District Engineer
8.2 Capacity Assessment and Design Criteria	GM/District Engineer
8.3 Prioritization of Corrective Action	GM/AGM/District Engineer
8.4 Capital Improvement Plan	GM/District Engineer
9. Monitoring, Measurement and Program Modifications	GM/AGM
10. Internal Audits	GM/AGM
11. Communication Program	GM/AGM/District Board

Table 1 - Implementation Responsibilities

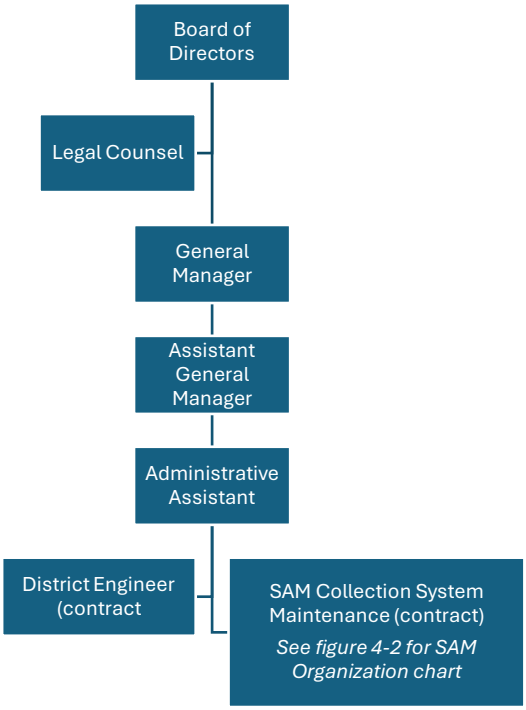
RESPONSIBLE POSITION CONTACT INFORMATION

Responsible Position Contact Information	Phone	Phone
General Manager (contract) - LRO	760-522-4419	cduffy@dudek.com
Assistant General Manager - LRO	650-703-2281	hatmore@granada.ca.gov
District Engineer (contract)	650-483-5301	johnrayner@kennedyjenks.com
Sewer Authority Mid-Coastside	650-726-0124	timc@samcleanswater.org

Table 2 – Responsible Position Contact Information

2.3. ORGANIZATIONAL CHARTS

Figure 2.1 - GCSD Organization Chart



The organization chart for Granada Community Services District is shown in Figure 2.1. Roles and responsibilities of key personnel involved in the wastewater collection system are as noted below.

Board of Directors: The Governing Board that adopts the SSMP plan and policy, approves the budget to implement the SSMP.

General Manager: Overall responsibility for preparing and implementing the SSMP, monitors SSMP budget and performance, manages capital improvement projects, and serves as the Legally Responsible Official.

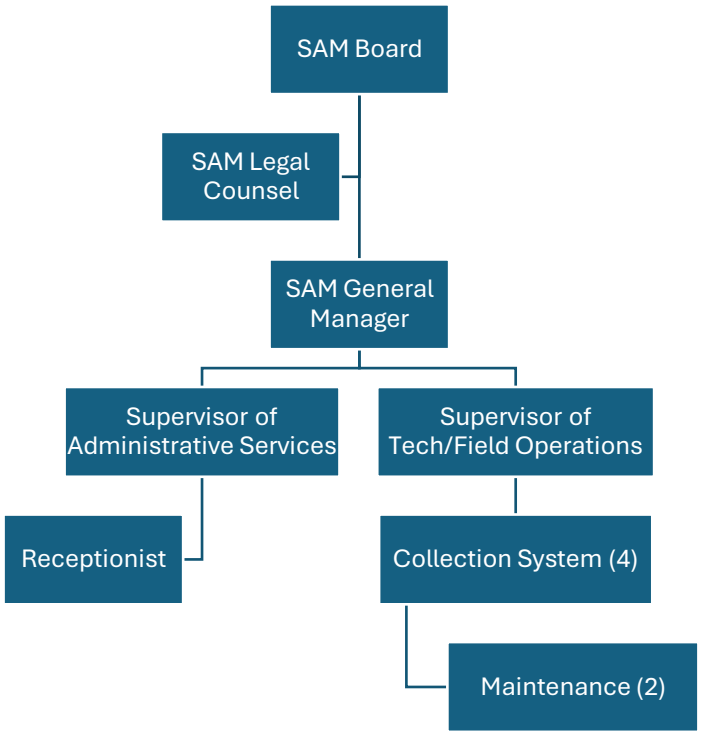
Assistant General Manager: The Assistant General Manager directs contractor activities in cleaning and television inspection of the collection system; manages contracted wastewater collection system staff and oversees sewer overflow response; prepares and submits reports; and develops the annual work plan for maintaining, inspecting and improving the sewer system.

District Engineer (contract): Provides support to the General Manager and Assistant General Manager in support of the SSMP.

Maintenance Workers: Assist with sewer system activities in conjunction with Sewer Authority Mid-Coastside staff, which provides sewer system cleaning, some maintenance, and SSO response by contract. The SAM Supervisor is the CIWQS Data Submitter.

Most of the District's collection system maintenance activities are contracted out to Sewer Authority Mid-Coastside (SAM). Figure 2.2 shows the organizational chart for SAM, as related to sewer maintenance functions.

Figure 2.2 - SAM Organization Chart



2.4. CHAIN OF COMMUNICATION FOR REPORTING SPILLS

GCSD contracts with the Sewer Authority Mid-Coastside for spill response. Processes for notifying the District and/or SAM include; observation by the public, receipt of an alarm, or observation by SAM or District staff during the normal course of work.

Public Observation – Public Observation is the most common way the District and/or SAM is notified of blockages and spills. SAM's telephone number for reporting sewer problems is (650)726-0124. Contact information for SAM is listed at www.samcleanswater.org and granada.ca.gov.

During regular business hours, GCSD staff receives spill report calls and contacts SAM directly. Outside of business hours, the District homepage and recorded phone message refer spill observers directly do SAM.

- Normal Business Hours: When a report of a sewer spill or backup is made during business hours, an Administrative Assistant receives the call, collects basic information about the caller and the problem, and logs the call and caller information onto the Collections Callout Form. This form is forwarded to the SAM Lead Collections Worker who will contact an available SAM Collections Crew to respond. The completed Collections Callout Form is then entered into the SAM Computerized Maintenance Management System (CMMS). A copy of the Collections Callout Form is forwarded by email to the District and a hardcopy is filed in SAM files.
- Outside Business Hours: After hours, the On-Call Employee will complete the Collections Callout Form. This form is forwarded to the SAM Lead Collections Worker the next business day. The completed Collections Callout form is then entered into the SAM CMMS. A copy of the Collections Callout Form is forwarded by email to the District and a hardcopy is filed in SAM files.

When calls are received, either during normal work hours or after hours, the individual receiving the call will collect and include in the spill event file, at a minimum, the following information to record the complaint:

- Date, time, and method of notification,
- Date and time the complainant first noticed the spill, if available,
- Narrative description of the complaint, including any information the caller provided regarding whether the spill has reached surface waters or a drainage conveyance system, if available,
- Complainant's contact information, if available, and
- Final resolution of the complaint.

If it is a spill or backup is in the District's service area, the collections crew (during business hours) or standby employee (after hours) will respond to the address of the complaint and do an investigation. If the complaint is not a spill, the crew members'

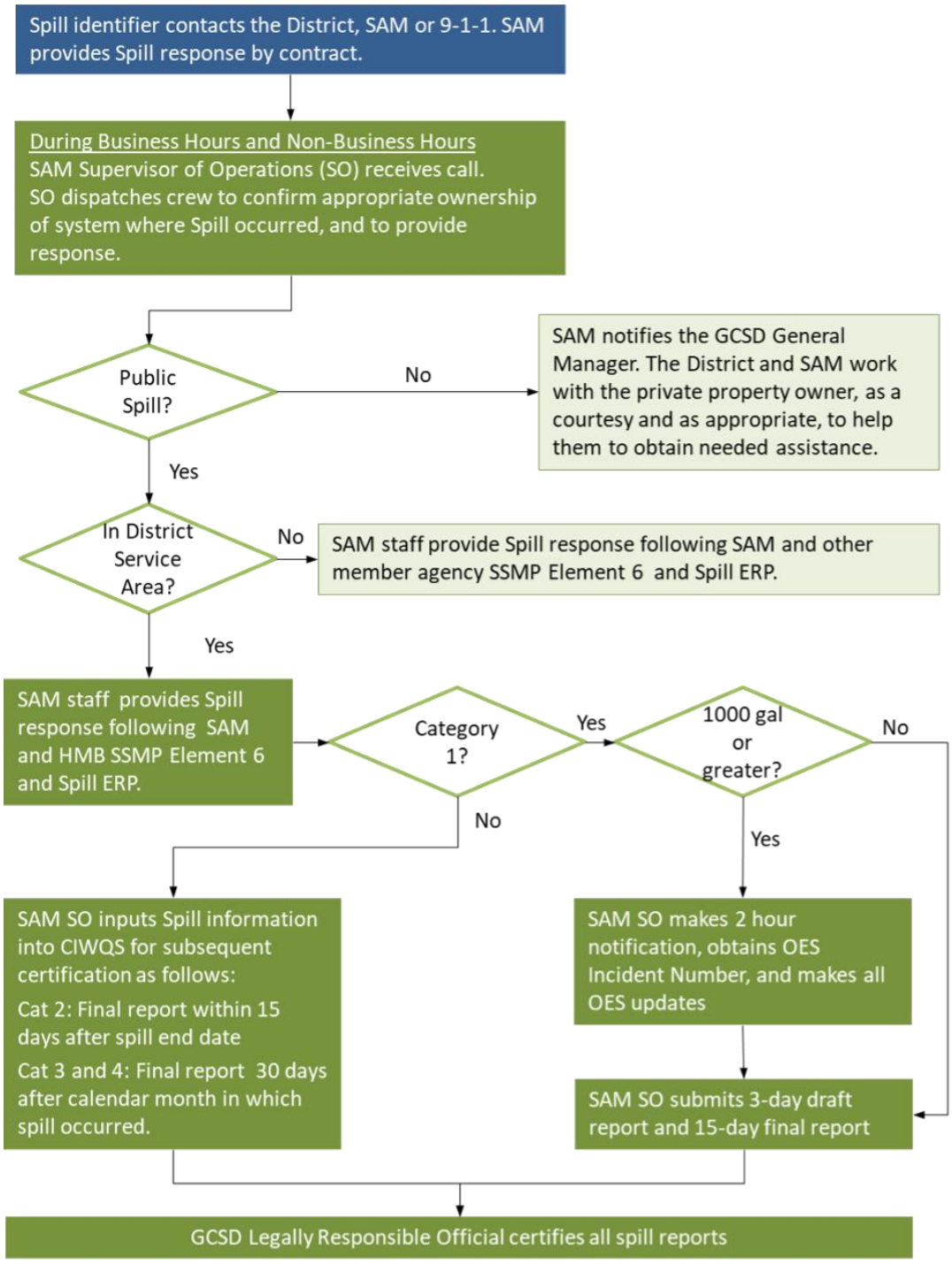
findings and actions taken, if any, are logged into the SAM CMMS using a field laptop if available. If a field laptop is not available, the information will be entered into the CMMS when the employee returns to the SAM Office.

If the complaint is a spill, the crew member will complete the SAM Sanitary Sewer Spill and Backup response workbook, enter the findings and actions taken into the SAM CMMS, and notify District LRO (General Manager and/or Assistant General Manager) to coordinate entry into CIWQS.

Lift Station Alarms – GCSD has one lift station. In the event of a station failure, the lift station alarm system is activated which alerts appropriate SAM staff. To prevent spills, wastewater from the wet well can either be pumped into a vacuum truck for disposal to a nearby sanitary sewer manhole or bypass around the station into the sanitary sewer system.

District and SAM Staff Observation – SAM and District staff conduct periodic inspections of the District sewer system as part of routine activities. Any problems noted within the sewer system facilities are reported to appropriate staff that, in turn, responds to emergency situations. Work orders are issued to correct non-emergency conditions.

Figure 2.3 - Spill Response Communication Flowchart



EFFECTIVENESS

Key Performance Indicators

1. Have there been changes in assigned SSMP Responsibilities list and if so, were those changes noted in the SSMP Change Log?
2. Is there a process in place to ensure contact information is up to date?
3. Is there a process in place to ensure organizational charts are up to date?
4. Are service calls properly routed to appropriate personnel?
5. Were all spill response activities documented and forwarded to the LRO?

IMPLEMENTATION

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
2.1	Review names, contact information, roles and responsibilities for accuracy. Update as needed.	Annually – to be completed with Annual Report	X		X
2.2	Review contact information and chain of command with contractor (SAM). Update as needed	Annually – to be completed with Annual Report	X		X

RESILIENCE

Resilience for Element 2 is addressed by:

- Ensuring that more than one person is responsible for each specific SSMP Plan Implementation.
- Designation of more than one LRO to ensure full and continuous coverage of duties.
- Maintained communication with contract collections/maintenance crews (SAM)

3. Legal Authority

REQUIREMENTS

Att. D-3 (pg. D-4)

"The Plan must include copies or an electronic link to the Enrollee's current sewer system use ordinance, service agreements and/or other legally binding procedures to demonstrate the Enrollee possesses the necessary legal authority to:

- *Prevent illicit discharges into its sanitary sewer system from inflow and infiltration (I&I); unauthorized stormwater; chemical dumping; unauthorized debris; roots; fats, oils, and grease; and trash, including rags and other debris that may cause blockages;*
- *Collaborate with storm sewer agencies to coordinate emergency spill responses, ensure access to storm sewer systems during spill events, and prevent unintentional cross connections of sanitary sewer infrastructure to storm sewer infrastructure;*
- *Require that sewer system components and connections be properly designed and constructed;*
- *Ensure access for maintenance, inspection, and/or repairs for portions of the service lateral owned and/or operated by the Enrollee;*
- *Enforce any violation of its sewer ordinances, service agreements, or other legally binding procedures; and*
- *Obtain easement accessibility agreements for locations requiring sewer system operations and maintenance, as applicable."*

COMPLIANCE

The District has legal authority to enforce SSMP requirements through the Granada Community Services District Ordinance Code. Specific sections related to the SSMP are described below.

Prevention of illicit discharges - The District's Ordinance Code Sections 503, Prohibitions and 502, Grease, Oil, and Sand Interceptors, address illicit discharges.

Section 503(01) – General prohibitions including but not limited to discharges that could interfere with, obstruct, or otherwise damage the sanitary sewer system, could endanger life or safety, could create detrimental environmental impact, or could cause the District or the Authority to be in violation of the law.

Section 503(02) – Prohibits storm drainage, ground water, and other surface waters except under certain conditions with a permit.

Section 503(03) – Prohibits unpolluted water except under certain conditions with a permit.

Section 502(01) – Outlines requirements for grease, oil and sand interceptors.

Collaboration with storm sewer agencies – San Mateo County Public Works oversees the storm sewer system within the GCSD boundaries. Current county storm sewer system maps are shared with GCSD and the SAM collections crew.

Require that sewer system components and connections be properly designed and constructed – Article IV of the District's Ordinance Code states that the District's adopted Standard Specifications govern the manner of construction, repair, maintenance and operation of all wastewater facilities within the District.

Ensure access for maintenance, inspection, and/or repairs for portions of the service lateral owned and/or operated by the Enrollee – Section 401(07) of the District Ordinance Code specifies the District's responsibility for the section of service lateral between the clean-out and the District's mainline contingent upon the cleanout being accessible.

Enforcement of Ordinances and Agreements - Article VIII, Enforcement, defines the powers and authority of inspectors (Section 801), customer responsibilities for correcting violations (Section 802), termination of service (Section 803), revocation of permits (Section 804), public nuisance (Section 805), criminal penalties (Section 806), and cumulative remedies (Section 807).

Easement Accessibility Agreements - Section 404, Dedication of Sewers – Easements, defines required easements for pipelines and other District facilities.

EFFECTIVENESS

Key Performance Indicators

1. Are the District codes and ordinances adequate for fulfilling the SSMP legal requirements?
2. Does the District have a process in place for periodic review and evaluation of legal authorities?
3. Have there been instances when the code or ordinance did not address a need or circumstance?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
3.1	Review District Ordinance Code to confirm code provides necessary legal authority.	Every six years concurrent with SSMP update.	X		X
3.2	Request updated storm sewer system maps from San Mateo County.	Triennially – with SSMP Audit.	X		X
3.3	Monitor and document occasions when Ordinance Code failed or succeeded to address issues as intended.	Ongoing	X		X

RESILIENCE

Resilience for Element 3 is addressed by:

- Reviewing Ordinance Code periodically.

APPENDIX ELEMENT 3 INCLUSIONS

- Granada Community Services District Ordinance Code
- Granada Community Services District Standard Specifications

4. Operation and Maintenance Program

REQUIREMENTS

"The Plan must include the items listed below that are appropriate and applicable to the Enrollee's system."

4.1. Updated Map of Sewer System

REQUIREMENTS

Att. D-4.1 (pg. D-4)

"An up-to-date map(s) of the sanitary sewer system, and procedures for maintaining and providing State and Regional Water Board staff access to the map(s). The map(s) must show gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater conveyance facilities within the sewer system service area boundaries."

COMPLIANCE

The District's sanitary sewer system map is currently stored in a cloud-based GIS and is also available to collection system staff via the SAM Lucity computerized maintenance management system (CMMS) that is shared among the SAM member agencies. The system maps include pipes including pipe lengths, diameters, and approximate year installed, and manholes including most pipe inverts. Additionally, paper map files are stored at the District office and all maps are updated as needed by the District's mapping consultant.

The sewer maps do not include storm drain facilities. The County of San Mateo is responsible for maintaining the storm drain system including mapping. San Mateo County provides pdf copies to District staff of all storm conveyance systems within the District boundaries which are also shared with SAM collections staff.

The District map file was uploaded to SWRCB per the 2022 Order.

EFFECTIVENESS

Key Performance Indicators

1. Were all map updates completed in a timely manner?
2. Are all staff trained in the procedure for providing map update information?
3. Are newly installed sewer assets incorporated into the system maps?
4. Are there terrain features or assets that should be incorporated in future map updates (e.g. exposed pipe, siphons, ARVs, surface water, etc.)?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
4.1.1	Review/ensure all newly installed lines and facilities have been included in system maps.	As development occurs	X	X	X

4.2. Preventive Operation and Maintenance Activities

REQUIREMENTS

Att. D-4.2 (pgs. D-4/D-5)

"A scheduling system and data collection system for preventive operation and maintenance activities conducted by staff and contractors. The scheduling system must include:

- *Inspection and maintenance activities;*
- *Higher-frequency inspections and maintenance of known problem areas, including areas with tree root problems;*
- *Regular visual and closed-circuit television (CCTV) inspections of manholes and sewer pipes*

The data collection system must document data from system inspection and maintenance activities, including system areas/components prone to root-intrusion potentially resulting in system backup and/or failure."

COMPLIANCE

The District contracts with SAM to operate and maintain the District's pump station and to clean and maintain the gravity collection system. The lift station is inspected weekly. The District, with SAM, maintains a 24 month target (2 years) for cleaning of all pipes. During cleaning, visual inspections of manholes are completed. More frequent cleaning occurs in areas known to need additional attention. This cleaning schedule is documented through SAM's GIS system (Lucity) and cleaning maps, yearly rolling total feet cleaned, and task summaries are shared with the District monthly. Maps and task summary examples are included in the Appendix for Element 4.

The contract requires SAM to be responsible for the means and methods used for cleaning, and for providing a sufficient quality of cleaning to avoid maintenance-related SSOs. In addition to providing routine sewer system cleaning, SAM develops a list that includes areas that may need a higher level of maintenance and provides this list to the District for review on an annual basis. In collaboration with SAM staff, this list is augmented to include new sites that had the potential to lead to SSOs in the prior year or that should be added to future CIP lists.

The District completes Closed-Circuit Television (CCTV) inspection and repairs through contracts with outside providers. The District also requests, from time to time, that SAM manage this work and pass these costs back to the District.

The District's CCTV inspection program is funded through the annual budget. Starting in FY 2027, the District will add a CCTV component to its GIS system which will enable staff to monitor CCTV progress and easily access footage of segments.

ADDITIONAL REQUIREMENTS

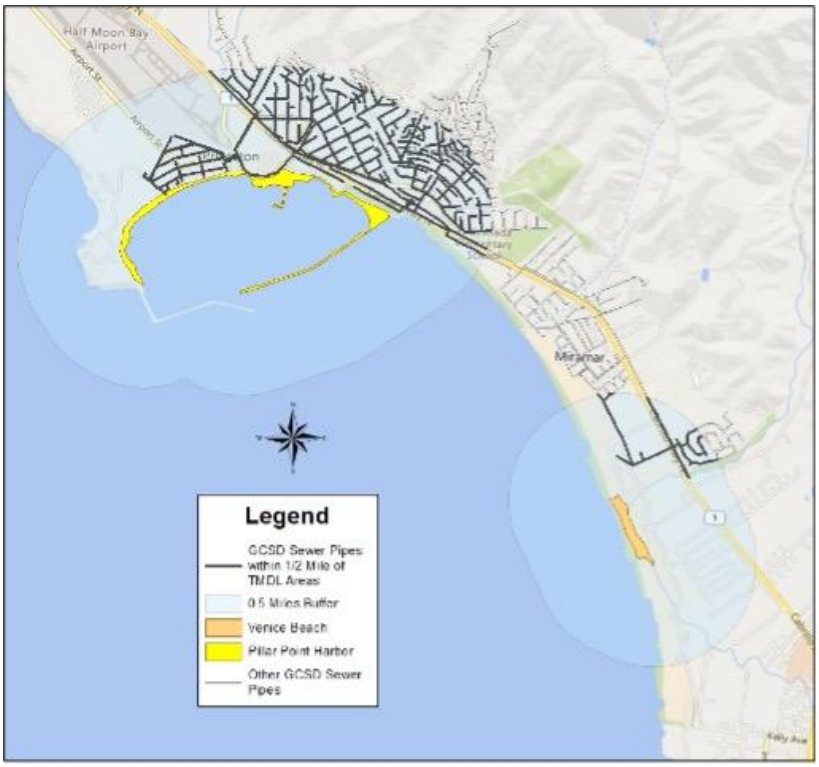
In February 2021, The California Regional Water Quality Control Board issued Resolution No. R2-2021-0002 (RWQCB Resolution) amending the Water Quality Control Plan for the San Francisco Bay Basin. The RWQCB Resolution establishes a Total Maximum Daily Load (TMDL) and Implementation Plan for bacteria at the beaches in Pillar Point Harbor and Venice Beach. The RWQCB Resolution requires the District to prioritize sewer system inspections and repairs in areas within one-half mile of Pillar Point Harbor and Venice Beach.

The RWQCB Resolution requires the District to complete all related sewer system inspections and to schedule any necessary repairs for identified priority lines within five years of the effective TMDL date.

COMPLIANCE

Figure 4.1 on the following page shows District gravity sewer pipelines located within one-half mile of Pillar Point Harbor or Venice Beach. The entire system, including within one half mile of Pillar Point Harbor and Venice Beach is cleaned, maintained, and visually inspected every two years and additional CCTV monitoring of various sections of the system is scheduled each year.

Figure 4.1 - GCSD Sewer Lines within One-Half Mile of Pillar Point of Venice Beach



EFFECTIVENESS

Key Performance Indicators

1. Are inspections of pipes, manholes, and lift stations being completed as scheduled?
2. Are inspection and maintenance activities reducing the number of volume of spills?
3. Does the District have a system for developing/tracking historical performance/results?
4. Is maintenance work being completed as scheduled?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
4.2.1	Review monthly cleaning maps, manhole and lift station inspections and task summary.	Monthly	X		X
4.2.2	Review yearly cleaning totals to track with 24 month full system cleaning.	Annually	X		X
4.2.3	Incorporate CCTV module into District GIS system.	July 1, 2026	X	X	X

4.3. Training

REQUIREMENTS

Att. D-4.3 (pg. D-5)

"In-house and external training provided on a regular basis for sanitary sewer system operations and maintenance staff and contractors. The training must cover:

- *The requirements of this general order;*
- *The Enrollee's Spill Emergency Response Plan procedures and practice drills;*
- *Skilled estimation of spill volume for field operators; and*
- *Electronic CIWQS reporting procedures for staff submitting data."*

COMPLIANCE

The District contracts with SAM to provide maintenance services and the appurtenant training including equipment training and safety training. SAM training includes spill emergency response, volume estimation, and other collection system management training as offered through the professional organization CWEA. SAM staff also receives regular training on the updated SSMP and the Spill Emergency Response Plan (SERP) which is included in the Appendix for Element 4. Additional trainings include vactor operations, injury and illness prevention, hazardous communications, and various safety trainings. SAM maintains training records including date, time, place, and content, name of trainer and names of attendees.

EFFECTIVENESS

Key Performance Indicators

1. Has all training been completed as scheduled?
2. Have consistent records of training and attendance been consistently documented and maintained?
3. Have all staff demonstrated ability and knowledge after each training event?

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
4.3.1	Review training documentation and training records with SAM Plant Superintendent.	Annually			X

4.4. Equipment Inventory

REQUIREMENTS

Att.D-4.4 (pg. D-5)

"An inventory of sewer system equipment, including the identification of critical replacement and spare parts."

COMPLIANCE

SAM, as the District's contract responder, maintains contingency equipment and replacement part inventories as described in the SAM SSMP. The District does not keep additional equipment or spare parts on hand.

EFFECTIVENESS

Key Performance Indicators

1. Are inventory lists being audited as scheduled?
2. Have any inventory deficiencies or omissions been discovered and rectified?
3. Has the District's contractor (SAM) experienced any equipment failure that inhibited a spill response?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
4.4.1	Review preventive operation and maintenance activities.	Monthly	X		X
4.4.2	Review training materials and schedules, and inventory lists and audits with SAM Plant Superintendent	Annually	X		X

RESILIENCE

Resilience for Element 4 is addressed by:

- Developing an SOP for updating maps when errors are discovered.
- Periodically evaluating inspection and cleaning cycle intervals to help ensure they are optimized.
- Developing schedule for District and contractor (SAM) to review training materials and schedules, and equipment inventories and audits.

APPENDIX ELEMENT 4 INCLUSIONS

- SAM SERP
- SAM SERP Workbook
- SAM SSMP
- SAM List of Redundant/Contingent Equipment
- Example SAM Monthly Tasks Summary
- Example SAM Monthly Cleaning Map

Specification 5.19 – Operations and Maintenance

REQUIREMENTS

Specification 5.19 (pg. 27)

"To prevent discharges to the environment, the Enrollee shall maintain in good working order, and operate as designed, any facility or treatment and control system designed to contain sewage and convey it to a treatment plant."

COMPLIANCE

The District's Maintenance and Operation agreement with SAM includes preventive cleaning and corrective maintenance of the District's sewer conveyance system and lift station. Per that agreement all gravity lines within the District are cleaned on a biennial schedule and visual inspection of manholes and lines are performed during cleaning. Cleaning maps are shared monthly with the District and feet cleaned and manhole inspections performed are reported monthly in the SAM Management Report. Based on collaborative lists between the District and SAM, additional cleaning of areas with known maintenance issues is performed.

The District's one lift station is inspected weekly by SAM and more thorough annual inspections and maintenance are performed by outside contractors prior to the start of the rainy season.

Per the Maintenance and Operation agreement, SAM staff responds to emergency and non-emergency calls. Call out reports are shared with District staff following SAM response.

5. Design and Performance Provisions

5.1. Updated Design Criteria and Construction Standards and Specifications

REQUIREMENTS

Att. D-5.1 (pg. D-5)

"Updated design criteria, and construction standards and specifications, for the construction, installation, repair, and rehabilitation of existing and proposed system infrastructure components, including but not limited to pipelines, pump stations, and other system appurtenances. If existing design criteria and construction standards are deficient to address the necessary component-specific hydraulic capacity as specified in section 8 (System Evaluation, Capacity Assurance and Capital Improvements) of this Attachment, the procedures must include component-specific evaluation of the design criteria."

COMPLIANCE

The District utilizes the expertise of professional consultants in establishing design criteria for the pump station, force main, and gravity sewer rehabilitation projects. The District uses the County of San Mateo's sanitary sewer design standards with minor modifications as its design standard for collection system pipelines. Information regarding current standards utilized by professional engineers working on the District's infrastructure can be found in the Element 3 Appendix. Per Section 402 of the District Ordinance Code, the District's engineering representative shall examine plans for all new mainline extensions to ensure they are in accordance with the Standard Specifications and policies of the District which are found in the Appendix of Element 3.

EFFECTIVENESS

Key Performance Indicators

1. Are plans checked for adherence to District Standards?
2. Do plan documents include District specification drawings?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
5.1.1	Ensure project plans include and adhere to all District Standard Specification and Details.	Each Project		X	

5.2. Procedures and Standards

REQUIREMENTS

Att. D-5.2 (pg. D-5)

"Procedures, and standards for the inspection and testing of newly constructed, newly installed, repaired, and rehabilitated system pipelines, pumps, and other equipment and appurtenances."

COMPLIANCE

Per Section 403 of the District Ordinance Code, all work shall be inspected by the District or its representative during construction and before use is made of the facilities constructed. Inspections of repairs and rehabilitation projects are performed by the District's engineering representative or a professional consultant.

EFFECTIVENESS

Key Performance Indicators

1. Were any design or installation deficiencies found during inspections
2. Are deviations from standard procedures and/or specs, testing, etc., justified and documented?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
5.2.1	Verify inspection records and ensure adherence to District Standards and Specifications	Each Project		X	

RESILIENCE

Resilience for Element 5 is addressed by:

- Staying abreast of industry trends and standards.
- Performing inspections of newly installed or repaired assets to evaluate design and installation practices.
- Contracting with a professional engineering firm to provide expertise.

6. Spill Emergency Response Plan

REQUIREMENTS

Att.D-6 (pg. D-6)

"The Plan must include an up-to-date Spill Emergency Response Plan to ensure prompt detection and response to spills to reduce spill volumes and collect information for prevention of future spills. The Spill Emergency Response Plan must include procedures to:

- *Notify primary responders, appropriate local officials, and appropriate regulatory agencies of a spill in a timely manner;*
- *Notify other potentially affected entities (for example, health agencies, water suppliers, etc.) of spills that potentially affect public health or reach waters of the State;*
- *Comply with the notification, monitoring and reporting requirements of this General Order, State law and regulations, and applicable Regional Water Board Orders;*
- *Ensure that appropriate staff and contractors implement the Spill Emergency Response Plan and are appropriately trained;*
- *Address emergency system operations, traffic control and other necessary response activities;*
- *Contain a spill and prevent/minimize discharge to waters of the State or any drainage conveyance system;*
- *Minimize and remediate public health impacts and adverse impacts on beneficial uses of waters of the State;*
- *Remove sewage from the drainage conveyance system:*
- *Clean the spill area and drainage conveyance system in a manner that does not inadvertently impact beneficial uses in the receiving waters;*
- *Implement technologies, practices, equipment, and interagency coordination to expedite spill containment and recovery;*
- *Implement pre-planned coordination and collaboration with storm drain agencies and other utility agencies/departments prior, during, and after a spill event;*
- *Conduct post-spill assessments of spill response activities;*
- *Document and report spill events as required in this General Order; and*
- *Annually, review and assess effectiveness of the Spill Emergency Response Plan, and update the Plan as needed."*

COMPLIANCE

The District contracts with the Sewer Authority Mid-Coastside for emergency spill response and follows the SAM Spill Emergency Response Plan (SERP) that was developed in accordance with the requirements of the Reissued WDR. The SERP is included in the Appendix of Element 4 of this SSMP. The SERP is also available on the District's website and can also be viewed at the District office.

EFFECTIVENESS

Key Performance Indicators

1. Have spill response efforts helped prevent the discharge of sewage to surface waters?
2. Do post-spill assessments indicate staff are following the procedures outlined in the SERP?
3. Is SERP training effective and do trainees demonstrate adequate knowledge and response?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
6.1	Review training materials and schedules with SAM Plant Superintendent	Annually in June	X		X
6.2	District staff to participate in SAM SERP trainings.	Starting June 2026			X
6.3	Review SERP for any needed updates or deficiencies.	Annually	X		X

RESILIENCE

Resilience for Element 6 is addressed by:

- Multiple staff are trained to respond to spill events.
- Provide consistent annual training.

7. Sewer Pipe Blockage Control Program

REQUIREMENTS

Att. D-7 (pg.D-7)

"The Sewer System Management Plan must include procedures for the evaluation of the Enrollee's service area to determine whether a sewer pipe blockage control program is needed to control fats, oils, grease, rags and debris. If the Enrollee determines that a program is not needed, the Enrollee shall provide justification in its Plan for why a program is not needed.

The procedures must include, at minimum:

- *An implementation plan and schedule for a public education and outreach program that promotes proper disposal of pipe-blocking substances;*
- *A plan and schedule for the disposal of pipe-blocking substances generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of substances generated within a sanitary sewer system service area;*
- *The legal authority to prohibit discharges to the system and identify measures to prevent spills and blockages;*
- *Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, best management practices requirements, recordkeeping and reporting requirements;*
- *Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the fats, oils, and grease ordinance;*
- *An identification of sanitary sewer system sections subject to fats, oils, and grease blockages and establishment of a cleaning schedule for each section; and*
- *Implementation of source control measures for all sources of fats, oils, and grease reaching the sanitary sewer system for each section identified above."*

COMPLIANCE

SAM provides mainline cleaning to the District by contract and source control services under SAM's non-domestic waste source control program (NDWSCP). The District and SAM collaborate to ensure adherence to the source control program. The District contracts with Mark Thomas to perform annual FOG testing. The District has not had a FOG-related SSOs in the past 10 years.

Public Outreach – The District disseminates information monthly on how to avoid FOG in pipes through social media outlets, email blasts, publicly posted flyers and the District's website. The District provides free grease bags to the public at the District

office as well as local grocery stores. These campaigns increase during holiday seasons. Additional information warning against 'flushable' wipes is shared 3-4 times per year. District staff provide information at 3-4 public events per year.

Disposal – Through SAM, the District engages an outside contractor to do annual inspections of grease interceptors at all food service establishments. Those establishments are provided with educational information including information on proper disposal.

Legal Authority - The District's Ordinance Code Section 503 prohibits illicit discharges, including those that may obstruct flow. That ordinance is further discussed in Element 3.

Requirement to install grease removal devices, design standards, etc. - The District Ordinance Code, Section 502 outlines requirements for the use of grease interceptors, the standards for design, inspection and cleaning readiness, and maintenance. The ordinance code and the District's Standards and Specifications can be found in the appendix of Element 3 of this document.

Inspection and Enforcement Authority – Sections 801 through 805 of the District Ordinance Code provides the District the authority to inspect, issue violations, terminate sewer service, revoke permits, and issue fines to ensure compliance with the District Code. The District, through SAM, contracts with an outside inspector to determine if food service establishments are in compliance with the District Code.

High Maintenance Areas – The majority of the food service establishments within the District are concentrated in a commercial area. Preventive maintenance and cleaning are performed more frequently on the affected lines.

EFFECTIVENESS

Key Performance Indicators

1. Have there been any blockages/spills from any identified problem area?
2. Is the District receiving feedback on public outreach efforts?
3. Is debris and other sewage solids collected during cleaning activities being disposed of appropriately?
4. Does the District have a plan and schedule for inspection of grease producing facilities (and is schedule appropriate or require amendments)? Was the schedule adhered to?
5. Have there been spills due to excessive fats, oil, grease, roots, or non-disposable wipes discovered in the sewer system?
6. Are there repeat offenders among food service establishments?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
7.1	Review of grease interceptor inspection reports, follow up with violators as needed.	Annually in September			X
7.2	Create outreach calendar for year including social media touches and events.	September 2026 and then annually.			X
7.3	Review SAM cleaning schedules of high maintenance/FOG likely areas.	Annually			X
7.4	CCTV of high maintenance/FOG likely areas.	June 2026	X		X

RESILIENCE

Resilience for Element 7 is addressed by:

- Inspect assets directly downstream of grease producing businesses to ensure source control is effective.
- Develop outreach doorhangers or flyers to perform targeted outreach when discoveries are made in the field.
- Perform regular assessments of system assets to monitor performance.
- Establish a QA/QC process for evaluating pipe cleaning effectiveness.

8. System Evaluation, Capacity Assurance, Capital Improvements

REQUIREMENTS

Att. D-8 (pg. D-7)

"The Plan must include procedures and activities for

- *Routine evaluation and assessment of system conditions,*
- *Capacity assessment and design criteria,*
- *Prioritization of corrective actions,*
- *Capital Improvement Plan*

8.1. System Evaluation and Condition Assessment

REQUIREMENTS

Att.D-8.1 (pgs. D-7/D-8)

The plan must include procedures to:

- *Evaluate the sanitary sewer system assets utilizing the best practices and technologies available.*
- *Identify and justify the amount (percentage) of its system for its condition to be assessed each year.*
- *Prioritize the condition assessment of system areas that:*
- *Hold a high level of environmental consequences if vulnerable to collapse, failure, blockage, capacity issues, or other system deficiencies.*
- *Are located in or within the vicinity of surface waters, steep terrain, high groundwater elevations, and environmentally sensitive areas.*
- *Are within the vicinity of a receiving water with a bacterial-related impairment on the most current Clean Water Act section 303(d) List (check with your local Regional Water Quality Control Board for their latest lists).*
- *Assess the system conditions using visual observations, video surveillance and/or other comparable system inspection methods.*
- *Utilize observations/evidence of system conditions that may contribute to exiting of sewage from the system which can reasonably be expected to discharge into a water of the State.*
- *Maintain documents and recordkeeping of system evaluation and condition assessment inspections and activities,*
- *Identify system assets vulnerable to direct and indirect impacts of climate change, including but not limited to sea level rise; flooding and/or erosion due to*

increased storm volumes, frequency, and/or intensity; wildfires; and increased power disruptions."

COMPLIANCE

Evaluation of System –The District conducts evaluation of the system through its annual cleaning and inspection schedule contracted with SAM, CCTV, and pipeline replacement. The District has established a long-term goal of replacing all sewer pipes installed in the 1920s due to their advanced age as well as segments identified by SAM's maintenance crew as having elevated operational or structural risk. The remaining 1920s lines represent less than 1% of the overall system and are prioritized for the next capital improvement program. In the past five years, the District has experienced one Category 3 spill.

Identify percentage of system to be assessed – The District's entire system is cleaned and maintained every two years with additional cleaning in areas identified as needing higher maintenance. Additionally, the District completed a CCTV assessment of older segments and high maintenance segments in December of 2025 and will complete additional CCTV in April of 2026.

Prioritize condition assessment areas - As previously discussed in Element 4, in addition to assessing older or problem segments, the District also complies with the California Regional Water Quality Control Board issued Resolution No. R2-2021-0002 (RWQCB Resolution) amending the Water Quality Control Plan for the San Francisco Bay Basin. The RWQCB Resolution requires the District to prioritize sewer system inspections and repairs in areas within one half mile of Pillar Point Harbor and Venice Beach.

System assessment – The system (including manholes) is visually assessed as part of cleaning. CCTV is performed on older segments and problem segments and additional CCTV is scheduled for all areas within one half mile of Pillar Point Harbor and Venice Beach. The District's one lift station is inspected weekly with more thorough inspections annually.

Exiting of sewage from the system – The District is not aware of any section of its system allowing for the exiting of sewage.

Record keeping – The District maintains digital records of monthly cleaning maps. Additionally, maintenance callouts are logged in the District's GIS system. The District is incorporating a module for maintaining CCTV records and video into its GIS system in fiscal year 2026/27 which will also include PACP and MACP coding.

Climate change – The District has not performed independent studies on sea level rise or climate change and the potential impacts on its wastewater system. However, the District is involved in the San Mateo County Department of Emergency Management's Climate Resilience Infrastructure Strategic Plan (CRISP) and collaborates with other agencies to understand and address the impacts of climate change in the area.

EFFECTIVENESS

Key Performance Indicators

1. Is the District adhering to inspection schedules?
2. Are inspections being reviewed in a timely manner and are deficiencies addressed in a timely manner?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
8.1.1	Identify and perform CCTV on selected areas of system to assess for deficiencies.	Annually	X	X	X
8.1.2	Review cleaning maps and tasks summary provided by SAM collections crew.	Monthly	X		X
8.1.3	Discuss problem areas with SAM collections crew to identify possible projects for inclusion in future CIPs	Ongoing	X	X	X
8.1.4	Review spills and causes and make changes to maintenance programs.	Per event	X	X	X

8.2. Capacity Assessment and Design Criteria

REQUIREMENTS

Att. D-8.2 (pgs. D-8/D-9)

"The Plan must include procedures to identify system components that are experiencing or contributing to spills caused by hydraulic deficiency and/or limited capacity, including procedures to identify the appropriate hydraulic capacity of key system elements for:

- *Dry-weather peak flow conditions that cause or contribute to spill events.*
- *The appropriate design storm(s) or wet weather events that causes or contributes to spill events.*
- *The capacity of key system components.*
- *Identify the major sources that contribute to the peak flows associated with sewer spills."*

The capacity assessment must consider:

- *Data from existing system condition assessments, system inspections, system audits, spill history, and other available information.*
- *Capacity of flood-prone systems subject to increased infiltration and inflow, under normal local and regional storm conditions.*
- *Capacity of systems subject to increased infiltration and inflow due to larger and/or higher-intensity storm events as a result of climate change.*
- *Increases of erosive forces in canyons and streams near underground and aboveground system components due to larger and/or higher-intensity storm events.*
- *Capacity of major system elements to accommodate dry weather peak flow conditions, and updated design storm and wet weather events; and*
- *Necessary redundancy in pumping and storage capacities."*

COMPLIANCE

The District's flow rates are monitored by SAM and reviewed monthly by District staff and the governing board, and flow rates have remained mostly static in the past five years. The District is at near build-out capacity, and development within District boundaries is extremely low with an average of four to five new connections per year. The District has not experienced spills due to capacity deficiencies. In 2025, the District purchased a redundant backup pump for its one pump station.

EFFECTIVENESS

Key Performance Indicators

1. Has the District experienced capacity-related spills or surcharge condition during the audit period?
2. Has there been any changes to zoning designations (residential commercial, industrial)?
3. Has there been changes in rain event occurrences, intensity, and duration?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
8.2.1	Develop plan and budget for comprehensive I&I study of District's collection system.	July 2030	X	X	X
8.2.3	Implement I&I Study.	2030-2031	X	X	X

8.3. Prioritization of Corrective Actions

REQUIREMENTS

Att. D-8.3 (pg. D-9)

"The findings of the condition assessments and capacity assessments must be used to prioritize corrective actions. Prioritization must consider the severity of the consequences of potential spills."

COMPLIANCE

The District approaches capital improvements by prioritizing projects and dividing them into three phases to be completed over the course of 6 years. With this six-year cyclic approach, the District is able to address immediate and long term corrective actions while still taking advantage of economies of scale.

EFFECTIVENESS

Key Performance Indicators

1. Has the District adhered to its system evaluation/condition assessment efforts?
2. Has the District adhered to its prioritization/corrective actions for sewer and capacity improvement projects?
3. Have projects been completed before deficiencies caused failures?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
8.3.1	Six-year plan development based on 2025 CCTV and visual assessments.	December 2026	X	X	X
8.3.2	Maintain records of system evaluation and condition assessment inspections.	Ongoing	X	X	X

8.4. Capital Improvement Plan

REQUIREMENTS

Att. D-8.4 (pg. D-9)

"The capital improvement plan must include the following items:

- *Project schedules include completion dates for all portions of the capital improvement program.*
- *Internal and external project funding sources for each project.*
- *Joint coordination between operation and maintenance staff, and engineering staff/consultants during planning, design, and construction of capital improvement projects; and Interagency coordination with other impacted utility agencies."*

COMPLIANCE

The District prepares cyclical six-year capital improvement plans broken into three two-year phases allowing flexibility to re-prioritize projects based on new needs or information. The District budgets approximately $200,000 per year for replacing or rehabilitating the collection system and generally constructs a CIP project every other year in order to take advantage of economies of scale. By following this schedule, the District is able to budget for planned CIP projects without using reserves. Sewer service charges cover operating and administrative expenses and will increase by 5% each year through 2029/30 at which point rates will be reevaluated.

District staff and the District engineer are finalizing the plan for the next six-year CIP based on information gathered at the end of 2025. The focus of that plan will be to complete replacement of any remaining 1920's pipes, repair and replacement of high maintenance segments of the collection system, and rehabilitation of problem manholes. That work will occur between 2026-2032.

The District additionally allocates approximately $500,000-$700,000 annually toward SAM infrastructure projects as part of the JPA agreement. Addressing overall SAM capacity helps ensure the District's own capacity needs are met.

EFFECTIVENESS

Key Performance Indicators

1. Has the District's capital improvement plan been adhered to?
2. Has the District performed annual review of the capital improvement plan in order to adjust based on new findings?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
8.4.1	Evaluate and prioritize CIP projects based on new information gathered from system assessments.	Annually	X	X	X
8.4.2	Evaluate budget to ensure sufficient funding for needed CIP projects.	Annually	X		X
8.4.3	Address smaller or more immediate projects as they arise.	Per event	X	X	x

RESILIENCE

Resilience for Element 8 is addressed by:

- Is there an annual review of capital improvement plan and necessary budget by all necessary individuals?

9. Monitoring, Measurement, Program Modifications

REQUIREMENTS

Att. D-9 (pg. D-9)

"The Plan must include an Adaptive Management section that addresses Plan-implementation effectiveness and the steps for necessary Plan improvement, including:

- *Maintaining relevant information, including audit findings, to establish and prioritize appropriate Plan activities.*
- *Monitoring the implementation and measuring the effectiveness of each Plan Element.*
- *Assessing the success of the preventive operation and maintenance activities.*
- *Updating Plan procedures and activities, as appropriate, based on results of monitoring and performance evaluations; and*
- *Identifying and illustrating spill trends, including spill frequency, locations, and estimated volumes."*

COMPLIANCE

Maintaining information – Monthly cleaning records are maintained by SAM in the Lucity CMMS system and cleaning maps and CCTV footage are stored digitally by the District. Additional monthly summaries are provided to the District by SAM that include rolling totals of pipes cleaned, inspections of manholes and lift station and work orders. A CCTV module for maintaining and accessing CCTV data will be added to the District's GIS system in 2026/27. All maintenance calls are logged in the District GIS system.

Monitoring implementation and effectiveness of the SSMP – Key performance indicators and implementation plans have been developed for each element of the plan. Staff identified in Element two of the plan will be able to measure effectiveness and timeliness of each element based on the established schedules and goals

Assessing preventive and maintenance activities – The District constantly assesses the preventive and maintenance activities by establishing cleaning and inspection targets, monitoring progress toward those targets on a monthly and annual basis and by monitoring spill trends.

Updating the SSMP – The District considers the SSMP a living document whose elements should be regularly reviewed, edited, and updated as needed through the change log and triennial audit.

Identifying spill trends – The District monitors spill trends using data from the GIS system, CIWQS, and through the Lucity CMMS system in cooperation with SAM.

EFFECTIVENESS

Key Performance Indicators

1. Are SSMP elements being periodically evaluated for effectiveness?
2. Are preventive and maintenance activities being documented?
3. Have changes been made to work programs and procedures because of program assessments?
4. Are trends being monitored and corrective action taken as necessary?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
9.1	Review of cleaning/preventive maintenance work programs.	Monthly with final annual review – June of each year.	X	X	X
9.2	Updates to SSMP based on assessments.	As needed or following triennial audit.	X		X
9.3	Monitor and evaluate spill trends. Document efforts.	Annually	X	X	x

RESILIENCE

Resilience for Element 9 is addressed by:

- Development of key performance indicators to measure effectiveness of the SSMP.
- Performance of periodic reviews of the SSMP to ensure the plan is being properly implemented.
- Developing and adhering to a timeline to correct deficiencies found during the audit process.
- Periodically evaluate work programs to help ensure effectiveness.

10. Internal Audits

REQUIREMENTS

Att. D-10 (pg. D-10)

"The Plan shall include internal audit procedures, appropriate to the size and performance of the system, for the Enrollee to comply with section 5.4 (Sewer System Management Plan Audits) of this General Order."

COMPLIANCE

The District's most recent Audit was completed for the period May 2022 through May 2025 (included in Appendix for Element 1) and triennial audits will be performed going forward as required. Audits will address compliance, implementation, and effectiveness of all elements of the SSMP.

Compliance – The District will review requirements of all elements to ensure ongoing compliance.

Implementation – Review of implementation plans to ensure they are being adhered to and updated as goals are met and new tasks are scheduled.

Effectiveness – Review of key performance indicators to ensure the District is addressing effectiveness of each element.

EFFECTIVENESS

Key Performance Indicators

1. Have audits been performed as required?
2. Have the audits assessed compliance, implementation, and effectiveness?
3. Have deficiencies been identified?
4. Has a plan and schedule to rectify the deficiencies been established?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
10.1	Address items identified in 2025 Audit	05/1/2026 with updated SSMP	X		X
10.2	Prepare for next SSMP Audit	Begin 5/2/2028	X		X
10.3	Complete and upload next SSMP Audit	By 11/2/2028	X		X

RESILIENCE

Resilience for Element 10 is addressed by:

- Periodically evaluate key performance indicators to assess effectiveness of each element and adherence to implementation plans/schedules prior to the audit.
- Evaluate previous audit to ensure deficiencies have been rectified.
- Calendar the audit due dates and complete the audit on time.

11. Communication Program

REQUIREMENTS

Att. D-11 (pg. D-10)

"The Plan must include procedures for the Enrollee to communicate with:

- *The public for:*
- *Spills and discharges resulting in closures of public areas, or that enter a source of drinking water; and*
- *The development, implementation, and update of its Plan, including opportunities for public input to Plan implementation and updates.*
- *Owners/operators of systems that connect into the Enrollee's system, including satellite systems, for:*
- *System operation, maintenance, and capital improvement-related activities."*

Compliance

Spills – The District contracts with SAM for spill response. Signs will be posted and barricades put in place to keep vehicles and pedestrians away from contact with spilled sewage. San Mateo County Environmental Health Services Department instructions and directions regarding placement and language of public warnings will be followed. Creeks, streams, and beaches that have been contaminated as a result of a spill will have signs posted at visible access locations until the risk of contamination has subsided to acceptable background bacteria levels.

Public Participation - The District holds public meetings on the third Thursday of each month at 7:00 p.m. at the District office. Meeting agendas are posted at the District office, on the District website, and at the El Granada Post Office. New information related to the SSMP is discussed at these meetings when available. The public may ask any questions or provide comments on the SSMP and its elements at the public meeting or directly with staff outside of public meetings. The District posts its SSMP on the District website and maintains a paper copy of the SSMP in the District office which can be made available during business hours.

Satellite Systems – The District has not have any satellite systems.

EFFECTIVENESS

Key Performance Indicators

1. Does the District place all SSMP action items on the agenda for regular board meetings?
2. Does the District perform outreach to residential customers?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Scheule	Responsible Party		
			MGR	**ENG**	**AGM**
11.1	Ensure the District Board approves the SSMP per schedule.	Board review and approval, April 16, 2026 (for 5/1/26 submittal)	X		X
11.2	Ensure current SSMP is posted on District website.	By June 30 following each updated submittal.	X		X

RESILIENCE

- Use the Sewer System Management Plan as a tool to communicate with the public how the agency is managing the system.
- Maintain a consistent presence with the public in the service area by attending community events or issuing periodic newsletters or other communications to the public.
- Make it clear and easy for the public to contact the agency and review the Sewer System Management Plan and appropriate supporting documents.

LIST OF APPENDICES

ELEMENT 1	• SSMP Audit for period of May 2022 through May 2025. • Collections, Operation and Maintenance Contract with Sewer Authority Mid-Coastside. • Sewer Authority Mid-Coastside Exercise of Joint Powers Agreement (JPA). • GCSD Sewer Budget FY25/26.
ELEMENT 2	• None
ELEMENT 3	• Granada Community Services District Ordinance Code • Granada Community Services District Standard Specifications
ELEMENT 4	• SAM SERP • SAM SERP Workbook • SAM SSMP • SAM List of Redundant/Contingent Equipment • Example SAM Monthly Tasks Summary • Example SAM Monthly Cleaning Map
ELEMENT 5	• None
ELEMENT 6	• None
ELEMENT 7	• None
ELEMENT 8	• None
ELEMENT 9	• None
ELEMENT 10	• None
ELEMENT 11	• None