

APPENDIX J

SSMP UPDATE LOG

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City of Mountain View 2018 SSMP Revisions

Ref. #	Comment/Recommendation from Gap Analysis	Level of Effort	Priority	Proposed Action	Lead*	Done ✓	Revision Comment
		Hi/Med/Low	Hi/Med/Low	Adopt/Defer/Partial/Reject	EOA/City/Joint		
General							
G-1	1. The current draft of the SSMP submitted for review does not provide the narrative details required by the WDR and and MRP or many of the expectations of the SWRCB SSO Office or the Enforcement Office.	Low	Hi	Partial	EOA	✓	Additional narrative has been added in a variety of places. Refer to specific comments below.
G-2	2. Remove all references to San Francisco Regional Water Quality Control Board (RWQCB) SSMP requirements at the beginning of each section and throughout the SSMP. Do not follow the former RWQCB SSMP development requirements (see SWRCB email dated 8/25/14 attached below 16).	Low	Low	Adopt	EOA	✓	Removed
G-3	3. Consider adding typical City collection system photos throughout the document.	Med	Med	Defer	--		Not done for this update (except photos in Pump Station ERPs and new SOPs)
G-4	4. There is a significant difference between the SSMP language and the language found in the critical supporting documents supporting the SSMP. The information from these reports must be conformed and be consistent with the policies and procedures for the operations of the City collection system (PIQ 1.1).	Hi	Med	Partial	EOA	✓	Most references have been conformed, however, there may still be some inconsistencies of language among documents.
G-5	5. Consider removing appendices from Elements V and VI and use them as references rather than including the entire document in the SSMP. Retain only items that clarify the City's operations and maintenance program or emergency response procedures.	Low	Low	Low	EOA	✓	All appendices have been moved to the end of the document.
G-6	6. Add reference sections at the end of each element for all references that are referred to in the Element either placed on the website or hyperlinked from the SSMP webpage. This will reduce the size of the SSMP but still make the information available for anyone accessing the SSMP. Consider hyperlinking all reference materials referred to in the SSMP rather than including them in the document.	Med	Low	Partial	EOA	✓	References have been added where appropriate, but the City is not incorporating extensive use of hyperlinks to internal (City) documents at this time. Note that not all sections need references, if the reference material is in the Appendices.
G-7	7. Are current City procedures conformed to the SSMP? SWRCB Inspectors expect to find City Procedures Manuals that further supports the SSMP language. The City needs to expand the number of SOPs for sewer operations and these should be referenced in the SSMP – some recommendations provided later in the document. The City should consider the development of a collection system specific Standard Operating Procedures Manual that includes the number of the SOP, the date issued and maintains all SOPs separate from the SSMP. The table of contents of the SOP Manual could be included as an appendix to Element IV with a hyperlink to the document itself for interested parties.	Med	Med	Partial	Joint	✓	City is in process of expanding Collection System SOP (e.g., Vac CON SOP, Rodding SOP). Except for Emergency Response, these will be kept in a separate document as suggested. No hyperlinks at this time.
G-8	8. Develop Management of Change Procedure to assure proper management of the SSMP and all critical supporting documents to assure the comprehensive management of all sewer related documents. See 2014 draft Audit Report Deficiency Code A. This SOP would establish the roles and responsibilities as well as schedules for the maintenance of all collection system related documents.	Med	Low	Partial	EOA	✓	City will implement a Revision Log but not a formal Management of Change document at this time. Roles and Responsibilities of parties will be included in SSMP Section 2.
G-9	9. Add copies of all forms used by Sewer Maintenance in Element IV. All forms should contain a form number and a date the form is placed into use – this should be described in the Management of Change Procedure.	Low	Hi	Adopt	Joint	✓	All current forms have been incorporated
G-10	10. Assure that all LRO designations (authorized representative) are also enrolled in CIWQS – currently only the Assistant Public Works Director and Utility Service Manager are enrolled as LROs not the Wastewater Supervisor or Crew Leader as stated in Element II (WDR Section J and D13. (ii)(a)). No Data Submitters now certified in CIWQS.	Low	Hi	Adopt	City	✓	Text has been conformed to actual practice. There are two LROs and multiple data submitters.
G-11	11. The recommendations from the draft 2014 SSMP Audit appear to be unresolved and are not incorporated into the revisions to the draft SSMP. SWRCB Enforcement Office recommends that all certified SSMP Audit Reports be attached to a separate appendices to the SSMP.	Low	Hi	Adopt	Joint		2015, 2017 audit reports to be attached to SSMP. The 2016 Gap Analysis is much more current and comprehensive than previous audits, and will serve as the primary source of recommendations for the 2018 SSMP update.
G-12	12. All changes to the SSMP since September 2013 should be identified in a new SSMP Change Log (MRP Section E3).	Low	Hi	Adopt	Joint	✓	The City documented changes for the 2015 revision. This matrix will serve as documentation for the 2018 changes.
G-13	13. Use consistent language and titles throughout the document for employee classifications, forms and references i.e. call report is this the same as the SSO Overflow report?	Low	Hi	Adopt	EOA	✓	Language has been conformed to extent practicable
Title							
T-1	1. Add City WDID number to the cover page of the SSMP (2SSO10111) (PIQ 2.1)	Low	Hi	Adopt	EOA	✓	

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		Hi/Med/Low	Hi/Med/Low	Adopt/Defer/ Partial/Reject	EOA/City/ Joint		
T-2	2. Add original Council adoption and recertification dates and resolution numbers to the cover of the SSMP. Assure all adoption documents are attached in separate appendix at the end of the SSMP and have been certified in CIWQS. Recommend that all SSMP adoptions be by resolution of the City Council (MRP Section 8(iv)). (PIQ1.2)	Low	Hi	Adopt	City	✓	Appendix I includes certification documents
Page i							
pi-	1. Eliminate three parentheticals related to the RWQCB SSMP requirements – no longer appropriate see SWRCB SSO Office (see SWRCB email dated 8/25/14 Page 16). Introduction	Low	Hi	Adopt	EOA	✓	
Introduction							
Section A SSMP							
I-1	• Remove references to Regional Board requirements in paragraph 2 and 3.	Low	Hi	Adopt	EOA	✓	
I-2	• Remove the reference to the 2008 SSMP preparation and only indicate the actual Council adoption date and resolution number for reference in the Audit section of the SSMP. This would also identify that these documents are attached to the SSMP in a separate appendices at the end of the SSMP (MRP Section 8(iv)). (PIQ 1.1)	Low	Hi	Adopt	EOA	✓	
I-3	• Add information and reference to the 2013 MRP WQ 2013-0058-Exec.	Low	Hi	Adopt	EOA	✓	
I-4	• Consider adding information about RWQCB SSMP requirements that predated the 2006 WDR if the City feels that is important – if so add statement covering the SSO Office SSMP outline requirements that replace all RWQCB requirements by the 8/25/14 email Page 16.	Low	Med	Adopt	EOA	✓	To simplify document, references to Regional Water Boar's initial involvement in SSMP development have been removed.
Section B Facilities							
• City Service Area and Sewer System (PIQ Section 2)							
I-5	o Add number of parcels and EDUs by classification (residential, commercial, industrial, institutional) discharging to the Mt.	Low	Med	Partial	City		This information was not readily available for inclusion in the 2018 update.
I-6	o Add three new tables for gravity pipe by size and material (including number of pipe segments) and pipe installation by decades as included in CIWQS Collection System Questionnaire (Update Tables 2-1, 2-2, and 2-3 of the Sewer Master Plan and include in SSMP). (PIQ 2.15)	Hi	Med	Partial	--	✓	Listings of pipe size, age, and material from the 2010 MasterPlan have been added to Appendix A, but do not include most recent additions.
I-7	o Add two tables each for pump station and force main assets (see attached sample tables Page 19 and include information from Section 2.2.2 of the master plan). (PIQ 2.31, 2.36 & 4.32 TO 4.37)	Med	Med	Partial	City	✓	Information on pump station and collection system assets from the 2010 Master Plan was added to Appendix A. Add'l information on the Shoreline and Pastel Lane Pump Stations is in App. D. Main replacements through Mar 2018 are listed in App. F. Major O&M assets are listed in App B.
	o Add number of manholes, siphons, air relief valves and any other entry points to the collection system. (PIQ 2.34 and 2.35)	Med	Med	Partial	EOA	✓	Manholes and appertences are shown on the the 701 maps. The number of manholes is summarized in a table in Appendix B.
I-8	o Add information on total length of pipe in easements along with number of easements or percentage of the system in easements. (PIQ 2.19)	Med	Low	Partial	City	X	The information is on the 701 maps, butis not readily available in summary form.
I-9	o Add information and WDIDs for satellite agencies (Los Altos and Moffet) to Mt View, treatment at the Palo Alto Plant and flow of Mt View wastewater through the Los Altos collection system. Indicate that the sewage is treated at the City of Palo Alto Treatment Plant. (PIQ 2.24, 2.26 & 2.27)	Low	Hi	Adopt	Joint	✓ Partial	The agreement with Los Altos is referenced in Section III.C.2. A description of the JPA and of wastewater treatment at the PARWQCP is included in Appendix A.
I-10	o Add information on the City's role in ownership, operation, maintenance and replacement of sewer laterals. (PIQ 2.16, 2.17, 4.11 to 4.14)	Low	Hi	Adopt	EOA	✓	Property owner owns both lower and upper lateral, but City maintains lower lateral as a courtesy if a clean-out is available. See Intro-B
I-10	o Include a map of the entire service area including satellite agencies and pump station locations (PIQ 1.3).	Low	Hi	Adopt	City	✓	Added system map from 2010 Master Plan
I-11	Section C Definitions....					✓	The suggested additions to definitions section are not listed in this matix, but all were added to the SSMP definitions section.
Element 1 - Goals							
E1-1	• Remove RWQCB Requirements Section	Low	Hi	Adopt	EOA	✓	

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E1-2	• Are goals still applicable and effective given historical performance results since original inception of the WDR in 2006 and SSMP adoption in 2009.	Low	Hi	Adopt	City	✓	Goals were reviewed by City. No changes were made.
Element 2 - Organization							
	• Section C1 – Reporting Structure						
E2-1	o The reporting structure is confusing as it does not utilize the same names found in Figure II-1. Additionally Figure II-1 and II-2 have much information that does not apply to the collection system – consider streamlining the organization chart to include only those classifications or divisions that directly impact the collection system operations – some of the divisions in public services, Engineering and Environmental Safety? What about new construction inspection and capital program staff they should also appear on the chart as well as any regular service contractors for activities like roots and CCTV, etc.. (PIQ 8.47)	Med	Med	Partial	Joint	✓	A new Collection-specific org chart showing all relevant City Departments was developed (SSMP Figure 2) , The detailed Public Works and Fire Dept charts were retained with relevant positions highlighted. The roles & responsibilities of various Departments/divisions and of all key staff were reviewed and updated.
E2-2	o There is no mention of the Building Department – do they have responsibility for any of the FOG facilities required by the Uniform Plumbing Code? Should they appear in the organization chart and in the narrative?	Low	Hi	Adopt	EOA	✓	Clarified in new Org Chart and accompanying narrative.
	• Section C2 – Service Calls, etc.						
E2-3	o WDR requires “a narrative explanation” of the classification titles and their responsibilities to the collection system (WDR Section D13. (ii)(b)) either here or in C4.	Low	Hi	Adopt	EOA	✓	Roles/responsibilities of Departments, Department Sections, and key job classifications have been expanded in Section II.C
E2-4	o 3rd Bullet – if fully recovered is the supervisor still to be notified?	Low	Hi	Adopt	City	✓	Yes, WW Supervisor is notified
E2-5	o Add reference to where the “wastewater service call report” is found in the SSMP or add the form as an addendum to this Element.	Low	Hi	Adopt	EOA	✓	Wastewater Service Call Report is in Appendix A.
	• Section C3 – Authorized Representatives						
E2-6	o The first paragraph is not consistent with the current CIWQS listed persons certified as LROs. The authorized representative and the LRO are considered the same for the SWRCB (WDR Section J and MRP Section F). The current CWIQS list of LROs and Data Submitters includes two persons only yet this section states just the Wastewater Supervisor is responsible (not authorized in CWIQS currently) – the WDR requires 24/7/365 coverage therefore this section is deficient in identifying all authorized representatives. In addition, the agency can have multiple LROs and it should consider if additional LROs should be designated to assure full coverage for the City operations. Second LRO is currently the Assistant Public Works Director not the Wastewater Supervisor or the Crew Leader who are not designated with CWIQS as an LRO and therefore cannot certify reports (MRP F2 and F4). (PIQ 3.1)	Low	Hi	Adopt	EOA	✓	Text has been conformed to current practice and to CIWQS listings. WW Supervisor is currently not an LRO, but City will consider adding.
E2-7	o Crew Leader cannot be the Acting Wastewater Supervisor for CIWQS unless that person is designated in CIWQS.	Low	Hi	Adopt	EOA	✓	Clarified that crew leader can be acting WW Supervisor and can submit (but not certify) in CIWQS.
E2-8	o City is no longer required to notify the RWQCB or the Health Department of SSOs less directly required by these regulatory agencies – that is done now by OES.	Low	Hi	Adopt	EOA	✓	Notification/reporting requirements are summarized in Table 3.
E2-9	o This section must be completely revised.	Med	Hi	Adopt	EOA	✓	Identified changes will be made + reorganization
	• Section C4 – Responsibility for SSMP						
E2-10	o The first paragraph is not consistent with Appendix II-A	Med	Hi	Adopt	Joint	✓	This Section was reorganized and the changes made. A contact list with phone numbers is maintained by Public Works and is available to all staff, but is not published in the SSMP out of concern for privacy.
E2-11	o Appendix II-A - Consider deleting the dept. from each of the Elements listed and just provide classification title						
E2-12	o Add phone numbers to Appendix II-A as stated in the narrative and required by the WDR (D13. (ii)(b)).						
E2-13	o Add person and classification responsible for the Introduction Section of the SSMP.						
E2-14	o Add person and classification responsible for three new appendices (adoption documents, audit reports and SSMP Change Log) at the end of the SSMP.						
E2-15	o Add “narrative explanation” of the classification descriptions stated in the organization chart here or in C2.						
	• Section C5 – SSO Reporting (PIQ Section 15)						
E2-16	o Either add a new response flow chart or refer to the actual Figure number in Element VI for the reader to easily obtain the information (current SSMP version Figures VI-1 and VI-2) (WDR D13. (ii)(c))	Low	Hi	Adopt	City		Appendix D has a new OERP developed by DKF Solutions, which contains response flowcharts.
Element 3 – Legal Authority (PIQ Section 6)							
E3-1	1. Remove RWQCB requirements.	Low	Hi	Adopt	EOA	✓	

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E3-2	2. State last dates of revision and what code sections were revised along with the schedule for regular municipal code section reviews for the sewer applicable sections.	Med	Med	Partial	EOA	✓	The Muni Code sections listed in SSMP Table 1, are available at https://library.municode.com/ca/mountain_view/codes/code_of_ordinances Each section includes references to the original ordinance numbers and their adoption date. There is no "regular schedule" for municipal code section review.
E3-3	3. Table III-1 – remove last column “Meets GWDR Requirements”.	Low	Hi	Adopt	EOA	✓	
E3-4	4. Have the recommended updates from the draft 2014 Audit been made to the municipal code – if so these should be added to the table.	Low	Hi	Adopt	EOA	✓	Yes, the recommended ordinance changes have been adopted.
E3-5	5. Add reference to the Uniform Plumbing Code in the FOG Control Section (MVMC 8.30.1)	Low	Hi	Adopt	EOA	✓	
E3-6	6. Why is the ensure access item “not applicable” – does the Building Dept not handle these issues or the Fire Dept?	--	--	--	--		City only maintains lower lateral if there is access (clean-out)
E3-7	7. Section D – Add additional descriptions of the Moffet and Palo Alto agreements as well as the agreement for Mt View flows that are discharged to the Los Altos system.	Low	Hi	Adopt	City	✓	See I-9
Element 4 – Operations and Maintenance Program (PIQ Section 4 and 8)							
• General Comments on the Element							
E4-1	o This Element is very general and requires expansion especially in light of the specific information included in the 2010 Sewer Master Plan and any other critical supporting documents.	--	--	--	--	✓	Will respond to specific comments/recommendations
E4-2	o This Element does not conform to the Sewer Master Plan descriptions or even mention several new studies and reports that have been completed in the past few years. Summary information from these documents needs to be included in the appropriate places in this Element.	Med	Hi	Adopt	EOA	✓	Brief summaries of other docs are now included
• Section B – Remove RWQCB requirements Section C1 _ Mapping (PQ 4.5 to 4.10)							
E4-3	o Remove RWQCB requirements	Low	Hi	Adopt	EOA	✓	
• Section Section C1 _ Mapping (PQ 4.5 to 4.10)							
E4-4	o Add information on how new and rehabilitated assets are added to the maps (sewer and storm) and on what schedule and by which department.	Low	Hi	Adopt	EOA	✓	
E4-5	o How are changes submitted to WW Supervisor and GIS from collection crews – any form documenting these requested changes? If not consider development of a document for this purpose that includes all involved steps in this process.	Low	Hi	Adopt	EOA	✓	Changes are submitted by crew as markups to 701 maps, which are reviewed collectively by staff and added to all crew maps. WW Supervisor forwards scanned copy to IT. Changes are also put on collections master wall map. No additional form is needed.
E4-6	o Do new developments really wait up to a year to be added to the mapping system? How is maintenance conducted if the field crews do not know of these new assets?	Low	Hi	Adopt	EOA	✓	Clarify maps are reprinted yearly. All crew 701 maps have hand markups, as does Collection's "Wall Map". Crew is familiar with new construction areas even if they don't have maps in hand.
E4-7	o No statements regarding the storm water conveyance facilities and how those assets are added or updated and notification to the field crews for use in emergency response (WDR Section 13D. (iv)(a)).	Low	Hi	Adopt	EOA	✓	Collection Crew 701 maps show storm drains. Update process is described in text.
• Section C2 – O&M Program							
E4-8	o This section is too general and requires additional specifics as detailed below to be responsive to the regulations in D13. (iv)(b)).						
E4-9	o Consider adding a description of the normal collection system staffing and consider the addition of a simplified organization chart of just the maintenance staffing and service contractors in this section of the SSMP.	Low	Hi	Adopt	EOA	✓	This was be done in Section II.
E4-10	o Add information in this section on large diameter pipeline (>12 inches) cleaning, hot spot cleaning, force mains, siphons, root control, and voluntary lateral maintenance responsibilities by City staff or service contractors.	Hi	Med	Partial	EOA	✓	Hot spot cleaning data is not summarized by diameter, but the information could be extracted from daily records if needed. The lateral maintenance policy is discussed in the Introduction. The Wastewater Section maintains lists of laterals for maintenance rodding.

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E4-11	o Add information on City return frequency for general pipeline cleaning, condition assessment, roots and grease control and return frequency for CCTV (see Page 21) based upon the philosophy included in the sample attached below or adopted to the current eight year frequency stated later in this Element.	Med	Hi	Adopt	EOA	✓	Most of this has been added
E4-12	o Add tables of historical cleaning results for both general cleaning and for hot spot cleaning (see samples in EXCEL spreadsheet Infrastructure Tables 5-11-16) and historical CCTV assessments. Include number of pipe manhole-to-manhole segments included in the hot spot cleaning list.	Med	Med	Partial	City	✓	The City has 3, 6, 9, and 12 month cleanings lists and tracks cleaning footages on an ongoing basis and with annual summaries (see Appendix G "O&M Performance Data"). Narrative information of CCTV assessments was added.
E4-13	o Add description of how hot spots are placed on the list or removed from the list – does the City have a philosophy or process for this operation?	Med	Hi	Adopt	EOA	✓	Discussion of process added to C.2
E4-14	o Add discussion of manhole condition assessment and documentation.	Low	Hi	Adopt	EOA	✓	Discussion of process added to C.2 & C.3
E4-15	o Add discussion of the CMMS software or other programs used for work orders, etc. (PIQ 8.1 to 8.5)	Low	Hi	Adopt	EOA	✓	City is considering implementation of CMMS. This is now noted in Section C.2.
E4-16	o Add table for historical root control activities	Hi	Med	Defer			Not done for this update
E4-17	o Consider adding a requirement for annual Pump Station and Force Main Condition Assessment Checklist (see attached sample below). Reference recently completed studies (Pages 32 to 35). (PIQ 4.16)	Low	Low	Partial	EOA	✓	Recent studies were described and included in references. Staff are frequently at the two pump stations; a formal assessment process is deemed unnecessary.
E4-18	o Add description of how the City assures QA/QC of the cleaning operation to assure proper cleaning of the collection system pipes to this section. (See Page 20)	Low	Hi	Adopt	Joint	✓	This is handled through comprehensive training. See Section C-4. City also updating SOPs for field operations.
E4-19	o Add information from the Nolte I/I Study regarding maintenance rating in Table 7.1 of the Sewer Master Plan or in Section 3.	Low	Low	Adopt	EOA	✓	The Nolte documents which EOA reviewed address the condition assessment, and in some cases identify I/I as the basis for the assigned rating, but no document is identified as an I/I study per se.
E4-20	• Section C3 – R&R Program (PIQ 1.6 and Section 7)						
E4-20	o Expand this section to include information from other R&R studies and reports.	Med	Med	Partial	EOA	✓	The description of the R&R Program was expanded, including a reference to the 2015 Shoreline PS evaluation and proposed CIP projects.
E4-22	o 3rd Paragraph – consider removal of this last paragraph as it is not required by the WDR.	Lo	--	Reject	EOA		The paragraph is somewhat redundant but nevertheless relevant.
E4-23	o Add description of the priority system used for repairs and rehabilitation prioritization. Does or will the City in the future use PACP for condition assessment or stay with the system described in the master plan – if so state. Summarize Chapter 7 of the Sewer Master plan in this section.	Lo	Hi	Adopt	EOA	✓	The City is now using PACP rating system, as indicated in Section IV.C.2.
E4-18	o State the City Department responsible for the CIP preparation and management and add to the organization chart in Element II.	Lo	Hi	Adopt	City	✓	The new Org Chart and accompanying text in Section II describe responsibility for CIP development/implementation.
E4-19	o Add information on the Nolte Infiltration and Inflow Report.	Lo	Hi	Adopt	EOA		EOA reviewed various documents prepared by Nolte but not an I/I study per se.
E4-20	o Add information on the pump station and force main condition assessment work completed and capital projects proposed and schedules for the recommended improvements.	Med	Hi		City	✓	The Dec 2015 Shoreline PS Assessment by Schaaf & Wheeler provided a basis for projects 17-48 and 19-48 (see Appendix F).
E4-21	o Add all referenced reports above or completed and not reviewed during the Analysis to the new Reference Section at the end of this Element.	Lo	Med	Adopt	EOA	✓	A list of references was added to the end of Section C.
E4-22	o Must add discussion of the long-range plans for renewal and replacement – currently discussed in Chapter 7 of the Sewer Master Plan (WDR Section D13. (iv)(c).	Med	Hi	Adopt	Joint	✓	Information on proposed CIP projects and associated budgets was added to Appendix F.
	• Section C4 – Training (PIQ Section 11)						
E4-23	o Add specific annual refresher training on the City SSMP, the OERP and the WQMP. Additionally discuss the training for new employees prior to their work in the collection system.	Low	Hi	Adopt	EOA	✓	Training write-up has been expanded to address some of these issues.
E4-24	o Consider regular annual or biannual planned field exercises for cleaning results coding (See Page 20), volume estimation and emergency response to practice actual staff responses to these operations and events. After each exercise, a debrief report documenting the exercise and those participating should be prepared and filed with other training records.	Med	Med	Partial	EOA	✓	The City conducts training and participates in outside training events but not necessarily on the fixed schedule. All training is documented.

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E4-25	o Consider the development of a collection system-training specific matrix for all classifications that work in the collection system or respond to collection system emergencies	Low	Low	Defer	--	See Comment	Sufficient training records are maintained by Collections. Staff size is small enough that a more formal tracking system is not warranted.
E4-26	o Contractor training – has the language in the current SSMP been included into the standard contractor language? If so state this. Consider adding regular project meeting agendas to include and document discussions regarding emergency response to SSOs in and around the project area. This should include proper notification and immediate actions expected of the contractor.	--	--	--	--		See next comment.
EB-27	o Consider requiring a contractor to submit a formal emergency response plan for the project that is at least as comprehensive as the City OERP plus a requirement for the submittal of documentation of training of employees.	Low	Hi	Adopt	EOA	✓	As now indicated in Section C.4, contractors must submit emergency response plan for City review.
E4-28	o Assure that all training is appropriately documented.	Low	Hi	Adopt	EOA	✓	Wastewater Supervisor is responsible for maintaining training records
	• Section C5 – Equipment and Replacement Parts (PIQ Section 12)						
E4-29	o How does the City handle electronic component in the pump station SCADA system? Are computer boards readily available and on hand – if so they should be added here.	Low	Hi	Adopt	Joint		This question was not fully resolved. Refer to Tom Louie about inventory question.
E4-30	o Why does the City operate the pump stations if the stations have gravity bypasses?	--	--	--	--	✓	Gravity bypasses are only effective up to a certain flow. This is now clarified in the text.
E4-31	o Does the City have 24/7 contact information for the neighboring agencies available to field crews to be able to access equipment and materials at any time day or night?	Low	Hi	Adopt	EOA	✓	Yes
E4-32	o The City has no long lead-time equipment that is maintained in the event of a loss of the functioning of the pump station equipment and force main.	--	--	--	--		Gravity bypass can be used below flow certain flow threshold. City will use outside contractors for bypass.
E4-33	o Add reference to Appendix IV-C in this section of the SSMP.					✓	Appendices have been reorganized. The SSMP Table of Contents and Appendix cover sheets list the content of each appendix.
	• Section C6 – O&M Resources (PIQ Section 5)						
E4-34	o This section is not required by the WDR and should be eliminated from the SSMP. Move the staffing information into the opening of Section C2.	Low	Hi	Reject	EOA	✓	A brief subsection for O&M staff resources seems like a natural fit here, even if not specifically called for. Information was retained. Staff resources are also addressed in Section II (Organization)
E4-35	o The CIP and Rehabilitation funding should be removed and included in Section C3 and on a list of the next five-year CIP in an appendix to this Element..	Low	Hi	Adopt	EOA	✓	CIP projects are now listed in Appendix F
	• Section C7 - Outreach						
E4-36	o Move this information to Section C4.						The brief paragraph in Section C.7 was retained,
E4-37	o Add information on the outreach with City service contractors including information included in the purchase orders or contracts and the use of regular meetings to assure proper understanding of emergency and sewer system responses. Document regular meetings with these providers regarding any outreach or training conducted. This information should also be included in the training section above.	Med	Med	Partial	EOA	✓	Contractors are required to develop and implement their own OERPs as described in Section VI.L. Wastewater Supervisor is responsible for documenting outreach/training activities. Contractor POs and contracts were not reviewed for this update.
	• Section C8 – References -						
E4-39	o Add a new section for all of the reports and studies referred to in the new narratives in this Element. These must be hyperlinked from the SSMP website or submitted to the CIWQS system (WDR Section E and MRP Section 8(iv)).	Low	Med	Partial	EOA	✓	Added list of references to individual Elements where appropriate. References to external (non-City) documents have hyperlinks. City documents are included in their entirety (e.g. OERP), as an excerpt (e.g., CIP Plan), or by non-hyperlinked reference. Although the MRP requires that "critical supporting documents" be posted on web site (or submitted to CIWQS), some judgement is involved, as it is simply not practical or desirable to make all reference documents available (e.g. 701 maps).
	• Appendix IV-A – Sewer Cleaning SOP						Note: This SOP is now in Appendix B
E4-40	o Add most current adoption date of this SOP and tracking number.	Low	Hi	Adopt	City	✓	Revision date is in footer.
E4-41	o Develop City numbering system for SOPs and all other City collection system SOPs for proper tracking and management.	Low	Hi	Reject	City		Because there are a small number of SOPs, the City believes that a formal numbering system is not needed.

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		Hi/Med/Low	Hi/Med/Low	Adopt/Defer/Partial/Reject	EOA/City/Joint		
E4-42	o Add person or position responsible for the approval and updating of the SOP.	Low	Hi	Adopt	EOA	✓	SSMP states that Wastewater Superintendent has this responsibility
E4-43	o How is the goal for cleaning of 95% determined? Does the City have a QA/QC program to assure this goal is meet? If so that should be described in Section C2.	Med	Low	Partial	EOA	✓	The 95% flow restoration goal cannot be monitored in a practical way, so the wording has been revised.
E4-44	o Recommend development of a calibration SOP for the gas detectors including documentation of the calibration (MRP D4).	Med	Low	Defer	EOA	See Comment	City does monthly maintenance and calibration per manufacturers recommendations. Development of an SOP is not a priority.
E4-45	o "Prior to leaving Yard" Section - Complete daily truck report and inspect all tools and equipment on the truck. -Assure the water tank on the vehicle is full. -Assure fully fueled vehicle	Med	Low	TBD	City	See Comment	No change at this time. The existing sewer cleaning SOP may be eliminated upon completion of the new SOPs for rodding and VacCon operation. (VacCon SOP was finalized 6/18/18 and includes an extensive checklis).
E4-46	o "At the job site" - Isn't gas detection generally done prior to opening the manhole lid?	Low	Hi	Adopt	EOA	✓	Clarified in new VacCon SOP.
E4-47	o Cleaning Operation - Update Table IV-2 to include description of each rating from the attached sample (See Page 20) for cleaning results to assure reporting consistence by field crews. - Consider adding information and requirements for condition assessment of the manholes accessed during the cleaning operation – consider a separate form for this reporting or add to the cleaning work order. - Add a sample copy of the work order form to this Appendix.	Low	Hi	Adopt	EOA		See comment to E4-45
E4-48	o "At The End of the Day" -Is the report of problems documented anywhere or is this just a verbal report to the supervisor? Documentation is critically important to a best in class operation and to assure proper response to the concerns raised. - Add requirements for supervisor approval and data entry of the daily work reports. Consider adding copy of the work report for information for the reader of the SSMP.	Low	Hi	Adopt	EOA	✓	Cleaning operations are summarized on the "Sanitary Sewer Flushing Sheet: and "Wastewater Daily Report", copies of which are included Appendix B. Flushing data is also tracked on the large wall map in the wastewater office. The Wastewater Supervisor reviews daily reports, and compiles YTD totals.
• Appendix IV-B – R&R Program (PIQ Section 7)							
E4-49	o Update and add a minimum of five future years from the City CIP for R&R; capacity improvements separately.	Low	Hi	Adopt	City	✓	5-yr CIP budgets are in Appendix F
E4-50	o What is the difference between the two projects currently listed? At least add a description of the work to be accomplished if there are not specific project designations.	--	--	--	--		Appendix VI-B has been replace with information from the current CIP Plan, excerpts of which are included in Appendix F.
E4-51	o No pump station or force main capital projects in the next five years? Not consistent with current reports reviewed during the audit.	--	--	--	--		5-yr CIP budgets in Appendix F include some Pump Station rehab projects
E4-52	o Consider removing the storm drain replacement dollars from this table.	Low	Low	Adopt	City	✓	CIP budgets distinguish between Sanitary and StormSewer projects
E4-53	o Add discussion of the long-term collection system needs for renewal and replacement in Section C3 above (WDR D13. (iv)(c)).	Low	Hi	Adopt	EOA	✓	The general process for identifying and tracking R&R needs is described.Section IV.C.2
• Appendix IV-C – Equipment							
E4-54	o Does the City have an emergency response trailer for responses to SSOs? If so add a description of this equipment.	Low	Med	Adopt	City	✓	Information on the City's Emergency Response Trailer has been added to this section.
Element 5 – Design and Performance Provisions							
E5-1	1. Appendix V-A - Consider removing the design criteria and hyperlink from the SSMP site to the design criteria. Add to the reference listing at the end of the Element.	Low	Med	Adopt	EOA	✓	Not implementing internal hyperlinks at this time. Information on design criteria has in now included in Appendix C.
E5-2	2. Recommend adding a description of the construction standards for testing and acceptance of all sewer related facilities not currently included (WDR Section D13. (v)(a)).	Med	Hi	Adopt	EOA	✓	Testing is covered in City's "Standard Provisions for Sanitary Sewers", in Appendic C
E5-3	3. Add acceptable manhole to the "materials for construction" to Section 1.	Low	Med	Partial	City	✓	Manhole materials are covered in Standard Provisions, Storm Drain Installation, in Appendix C
E5-4	4. How often does the City review and modify the design criteria? Does the City have a regular program for the review and addition or deletion of criteria from this document?	--	--	--	--		No fixed schedule for review/update of design criteria. Performed on an "as-needed" basis.
E5-5	5. Lateral installation requirements in easements not discussed.	Lo	Med	Partial	City		Standard provisions and Stadard Details cover lateral installation, but not, but not specifically in easements

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		Hi/Med/Low	Hi/Med/Low	Adopt/Defer/Partial/Reject	EOA/City/Joint		
E5-6	6. Backflow Prevention Valve	Low	Med	Adopt	EOA	✓	Building Dept may require backflow valve per plumbing code. Added statement to Section C (Design Criteria)
E5-7	o Consider adding "repair or replacement" to the Sewer Service Lateral 8B section.	--	--	--	--		Not sure what this comment refers to.
E5-8	7. Add a new reference section at the end of the Element for the design and inspection standards hyperlinked from the reference section or the SSMP webpage.	Low	Med	Adopt	EOA	✓	Design and construction standards are in Appendix C , and also hyperlink to the PW web page.
							See comment above
Element 6 - Overflow Emergency Response Plan (OERP) (PIQ Section 9, 14 and 15)							
E6-1	1. DKF updating the OERP. This new OERP should replace the entire current Element VI narrative	Med	Hi	Partial	City	✓	The new OERP has been completed and included in Appendix D. A significant amount of the original narrative was retained in Element VI, and narrative regarding water quality monitoring was added. Additional streamlining of the Element VI should be considered as part of future updates.
E6-2	2. Consider including only the front-end narrative of the new OERP document (Sections 1 – 16) and do not include Appendices in the back of the new OERP document.	Med	Hi	Partial	EOA	✓	See above comment
E6-3	3. Add a new reference section to this Element for the new OERP document and the attachments thereto.	Low	Hi	Partial;	EOA	✓	Not needed. The entire EORP is in Appedix D.
E6-4	4. Table VI-B – what is the purpose of having all of these people and contacts in this Element of the SSMP	Low	Hi	Adopt	EOA	✓	Contact list has been removed from this Element per recommendation. Contractor call-out list is now in Appendix D.
Element 7 – FOG Control Program (PIQ 8.35 to 8.46)							
E7-1	1. Remove the RWQCB Requirements	Low	Hi	Adopt	EOA	✓	
E7-2	2. Consider reformatting this Element with a separate section for each of the seven sub elements required by the WDR for ease of evaluation by regulators when assessing responsiveness of the SSMP to the regulations.	Low	Hi	Pertial	EOA	✓	Did not reorganized but referenced the relevent GWDR sub-element(s) in each of the headings
E7-3	3. Are all City divisions and departments in the Element II organization chart that are involved in the FOG program – building for the Plumbing Code?	Low	Hi	Adopt	EOA	✓	Clarified roles of various departments.
E7-4	4. Consider adding tables and graphs of the historical annual performance results for FSEs, number of inspections conducted, enforcement actions taken by type and any other historical performance results that further describe the FOG Control Program.	Hi	Med	Defer	Joint	See Commen +	Not completed for this update. Consider for future update.
E7-5	5. Section D1. – add reference to the Uniform Plumbing Code requirements. (PIQ 6.15)	Hi	Med	Adopt	EOA	✓	Added to legal authority sub-element
E7-6	6. Section D2. – add further explanation of the placement and removal of lines from frequent cleaning lists. Does the City have a real criteria used by the cleaning crews to recommend placement or removal like two or more cleanings with little or no grease or what? Reader should be referenced to the table in the Cleaning SOP for grease related results as the basis like cause for removal LG?	Med	Med	Partial	EOA	✓	Some clarification added. There is not a formal process for changing frequencies.
E7-7	7. Section D3 – first paragraph is a duplicate of D2 – consider deleting or maybe adding a general section prior to C2 for this statement that applies to all FOG related activities.	Low	Hi	Adopt	EOA	✓	Duplicative material was deleted. Information on inspections was incorporated into Commerciial FOG Control section.
E7-8	8. Section D4 Inspection and Outreach – consider adding availability of FOG related materials at all City counters for public distribution.	Low	Med	TBD	City		Not implemented at this time. Outreach activities are described in Section D.4.
E7-9	9. Add new section for references used in this Element.	Low	Hi	Adopt	EOA	✓	References with hyperlinks was added or updated. Information on "hot spots" and grease haulers was is included in Appendix E.
E7-10	10. Table VII-1 – Complete Castro Street and Remainder of El Camino Real potential FOG sources as other rows.	Low	Hi	Adopt	Joint		Not completed as of June 2018
E7-11	11. Table VII-A –						
E7-12	a. update information in the services column especially for Palo Alto plant.	Med	Hi	Adopt	EOA	✓	Updated and added link to PARWQCP web site.
E7-13	b. Is Imperial West Products a real option and do they have Bay Area disposal options yet? If not remove until available.	--	--	--	--	✓	Not available in the Bay Area. Removed from List
E7-14	c. Schedule regular reviews of this Table and maintain current.	--	--	--	--		
Element 8 - System Evaluation and Capacity Assurance Plan (PIQ 8.3)							
E8-1	1. Several additional studies and reports have been completed recently by Nolte and V&A – a summary description of these reports should be included in this Element	Med	Hi	Adopt	EOA	✓	Results from several studies have been summarized

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		Hi/Med/Low	Hi/Med/Low	Adopt/Defer/Partial/Reject	EOA/City/Joint		
E8-2	2. Has the general plan update stated in the SSMP been completed and if so how does that affect the collection system capacity? Discuss in this section of the SSMP. 2014 draft Audit says this work is complete.	Low	Hi	Adopt	EOA	✓	General Plan is completed. As noted, Precise Plans typically provide more current information on capacity issues and necessary remedies. In some cases, developers are required to address capacity issues as part of the permitting process for specific areas.
E8-3	3. Consider the need for updates to the sewer master plan as it is now six years old – when will the next update be scheduled. At a minimum state plans for the future of these evaluations – CIP does not include any funds for these recommendations currently even though the Master Plan has a list of sites for capacity improvements – have all these been completed?	Hi	Low	Defer	Joint	✓	An updated Sewer System Master Plan is being considered by the City but not yet scheduled, although a placeholder budget is included in the CIP budget for FY 2019-20. Generally capacity projects are funded by the developers whose redevelopment projects increase flows and create the capacity shortfall.
E8-4	4. Section C2 – summarize the master plan chapter dealing with the development of the hydraulic model supplemented by the recent flow monitoring results and their impact on the hydraulic model.	Low	Med	Partial	Joint	✓	The V&A report did not have any conclusions or discussion regarding impact on capacity analysis
E8-5	5. Section C2 – define “large diameter” for the reader. What about the capacity evaluation of small diameter collection lines leading to the large diameter lines? This section should discuss the Nolte I/I evaluation and how they are used in the capacity evaluation and the results of the Nolte and V&A studies and field evaluations. The master plan has a summary of the handling of these pipelines that could be added.	Med	Med	Partial	Joint	✓	Some discussion of Master Plan flow modelling methodology was incorporated into this section.
E8-6	6. Section C2 – expand the narrative to discuss what was found in the 2010 master plan that discusses more than just the large diameter pipes. It also states that 4% of the system has capacity problems (150 pipes) – were all of these improvements completed as of the present time? Has the City spent the \$4,000,000 estimated in the master plan for capacity improvements? See Table TS-1 from the master plan and conform narrative to this information.	Med	Med	Partial	Joint	See Comment	These issues have not all been addressed. The Master Plan's identified capacity deficiencies could be characterized as "potential deficiencies" based on relatively conservative criteria used, and none of the identified deficiencies have actually caused SSOs. Deficiencies based on projected flows for a particular area subject to redevelopment are further studied through the Precise Planning process, and requirements for addressing those deficiencies may be attached to the developer's permit.
E8-7	7. Section C4 and C5 – 2nd sentence of C4 not true as I read the master plan. Expand these sections to describe in more detail the findings and schedules from the master plan, the Nolte I/I Study and the recent V&A work for capacity related projects and the status of the recommended improvements. Also include the status of completions to date (\$2,752,000 est) and the future long-term enhancements that are still outstanding in future years as the plan looked at 2020 and 2030 also.	Med	Med	Partial	Joint	See Comment	This comment not fully addressed. See above comment regarding deficiencies. If the City plans to redo its Master Plan within the next few years, that would be a better source of information and recommendations than the 2010 MP and subsequent documents. Nevertheless, the City should compile and maintain a listing of projects completed within the last 10 years, and those currently in progress.
E8-8	8. Section C5 – add information on the 2020 and 2030 projected capacity needs identified in the master plan and how are they to be dealt with.					See Comment	The 2010 Master Plan is probably not the best source of current information on flow projections. A Sewer Master Plan is budgeted for FY 2019-20. Capacity needs for specific areas are more accurately identified in the Specific Plans. See also EB-6 comment.
E8-9	9. Appendix VIII-A – update this table for actual expenditures in the next five years for capacity needs at a minimum. Master Plan states \$1,600,000.	Low	Hi	Adopt	Joint	✓	CIP projected expenditures are in Appendix F. Proposed expenditures for next 5 years are listed, but they are never "actual" until they occur.
E8-10	10. Consider adding a new reference section to this Element with hyperlinks to these documents on the SSMP webpage (MRP Section 8)iv)) for the Sewer Master Plan and any other documents that support the future collection system capacity program.	Low	Med	Partial	EOA	✓	A link to the General Plan and GHG Program EIR (on City web site) was added to SSMP, but links on SSMP web page were not added.
Element 9 - Monitoring, Measurement and Program Modifications							
E9-1	1. Remove RWQCB requirements.	Low	Hi	Adopt	EOA	✓	
E9-2	2. Consider revising this Element to include historical performance results at least since the City began using the CIWQS system. Recommend that all performance results be graphed for either calendar or fiscal years and that the tables supporting these results also be included in the Element after each audit. This information can form the basis of annual reports to the City Council and the public to show effectiveness of the collection system operations.	Med	Med	Partial	EOA	✓	Performance data has been updated (and in some cases backfilled). See Appendix G. Several trend charts added.

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E9-3	3. Section C, 3rd bullet – replace “contained” with “recovered” to be consistent with the WDR and CWIQS reporting information.	Low	Hi	Adopt	EOA	✓	
E9-4	4. Section D – revise completely and remove opening sentence. Expand the narrative for the actual data that is now available.	Low	Hi	Adopt	EOA	✓	
E9-5	5. Add a Section E to provide and discuss SSO trends (WDR Section d13. (ix)(e))	Low	Hi	Adopt	EOA	✓	
E9-6	6. Appendix IX-A – update through 2015 and graph results. Add additional tables and graphs for the other three metrics stated in Section C. (See Page 31)	Med	Hi	Adopt	EOA	✓	Metrics updated through 2017. Graphs added for SSO volume and SSO causes only. Also table of O&M performance data. See App. G
E9-7	7. Consider adding an additional table and graph by calendar year comparing statistics for annual SSO rates and volume rates to the State and Region 2 SSO results . This will provide strong background for the required evaluation of the effectiveness of the collection system program.	Med	Med	Partial	EOA	✓	Some metrics added per comment to E9-6. Comparison to State and Region 2 data not done at this time.
Element 10 - Program Audits							
E10-1	1. Remove RWQCB requirements.	Low	Hi	Adopt	EOA	✓	
E10-2	2. Section C - Audits must be based upon the original Council adoption date (2009) of the SSMP and thereafter no later than every two years i.e. 2011, 2013, 2015, 2017, 2019, etc. SSMP states annually but the City is not complying with it’s own policy.	Low	Hi	Adopt	EOA	✓	Text was modified to conform with current requirements (2 yr audit cycle).
E10-3	3. Section C - WDR requires an SSMP audit at no later than every two years and that a formal audit report be prepared to document findings and required changes along with a schedule for the revisions. The City must determine the appropriate time frame that they can commit to and then conduct these audits. Does the current statement of annually really state what the City wishes to pursue or should it state not less frequently than every two years? All audit reports must be certified by the City LRO upon completion (WDR Section D14 and MRP Section F2 and F4)	Low	Hi	Adopt	EOA	✓	Text was modified to conform with current requirements (2 yr audit cycle).
E10-4	4. Section C – consider utilizing the more detailed audit checklist sample attached below in Table X-1. (See pp. 22-30)	Med	Med	TBD	City		Discuss with City. Use of new format is warranted.
E10-5	5. Section C – remove the last sentence of the 4th paragraph as no longer required in Region 2 (see letter dated October 3, 2012 attached below). (See Pages 17-18)	Low	Hi	Adopt	EOA	✓	
E10-6	6. SSO Enforcement Office has recommended that all audit reports be appended to the SSMP in a separate Appendix. They have found that these reports cannot always be produced during a field inspection or enforcement action.	Low	Hi	Adopt	EOA	✓	Plan to include last two audits in Appendix H.
E10-7	7. Section D – WDR requires that the SSMP be revised and readopted by the City Council at least every five years or when substantial changes are made to the SSMP. The SWRCB considers “substantial” to mean changes in the collection system budget or major changes in the capitol improvement program.	Low	Hi	Adopt	EOA	✓	Documentation for 2013 recertification was added to AppendixI. Upon completion of these revisions, SSMP will again be re-certified by the City Council.
E10-8	8. What is the status of the recommendations in the 2012 and the draft 2014 Audit Reports by RMC especially for the deficiencies identified at the end of the reports? What City classification has been assigned responsibilities to assure that these deficiencies or changes are completed and the SSMP is updated for any changes along with the updates to the SSMP Change Log? (MRP Section E3)						This comment not addressed. EOA did not receive these reports.
Element 11 - Communication Program (PIQ Section 13)							
E11-1	1. Remove RWCB requirements.	Low	Hi	Adopt	EOA	✓	
E11-2	2. Consider changing the Section C title to Communications of SSMP Implementation and Effectiveness	Low	Hi	Adopt	EOA	✓	Used "Communication of SSMP Development and Implementation" to most closely match GWDR.
E11-3	3. Section C – Add new narrative as to changes since original adoption or SSMP revision.	Med	Med	Partial	City	✓	
E11-4	4. Section D –Add requirement for an annual report to the City Council of performance results and then assure that this information is placed on the City SSMP website (WDR D13. (xi)).	Med	Med	Adopt	City	✓	This comment somewhat overstates the requirements of WDR D13. (xi). An annual report to council is not required. Performance information is included in Appendix G and should be updated annually.
E11-5	5. Section D – Appears that the City is not complying with the statements in this section. Not able to find performance information on the agency website. Correct the email address for additional information (WDR D13. (xi)).	Low	Hi	Adopt	EOA	✓	Performance information is in Appendix G, which will be posted as part of the SSMP. Annual reports to Council are currently not included but could be added to Appendix G

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E11-6	6. Section D – Consider adding the City CIWQS WDID number to this section for easy use of the CIWQS system by anyone desiring to access City collection system information. (PIQ 2.1)	Low	Hi	Adopt	EOA	✓	WDID number and other agency identifiers were added to this section.
E11-7	7. Section E – expand the section to include information on Moffet Field and Los Altos and the plan of communications that the City has with these two agencies along with the City of Palo Alto regarding treatment issues. All interagency communications must be formally documented and the documentation available upon request by the regulators.	Med	Med	Adopt	City	See Comment	Not completed as of June 2018. Informal lines of communication exist among the agencies. The SSMP states that that the City "shall create a plan of communication with systems that are tributary and/or satellite..." Although such a plan might include formal documentation, there is no specific requirement in the SSMP.
Add the Following New Appendices to the End of the SSMP							
Add-1	<ul style="list-style-type: none"> The MRP Section E3 requires at least one new appendix for an SSMP change log (See Page 36). The other two appendices recommended are strongly urged by the Enforcement Office and make for a complete historical record that may dissuade the Enforcement Office or RWQCB from conducting a field inspection of the collection system operations. In addition, it allows for an easy way to see how the agency is evaluating implementation effectiveness and to determine that the public and governing board are meeting their requirements under the WDR. <ol style="list-style-type: none"> Appendix – City of Mt. View SSMP Change Log (MRP Section E3) Appendix – SSMP Audit Reports Appendix – SSMP Adoption Documents 	Med	Hi	Partial	Joint	✓	Will add 2015 change log, but for 2018 update, will refer to this matrix given the very large number of changes that occurred. Appendices were added for Audit Reports and Adoption Documents.