

2021 Sewer System Management Plan Audit Report

Prepared in May 2022 by:



CITY *of* CLOVIS

PUBLIC UTILITIES

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Summary

The California State Water Resources Control Board's (SWRCB) Wastewater Discharge Requirements (WDR) adopted on May 2, 2006, require that owners of wastewater collection systems with more than one mile of pipeline adopt and implement a Sewer System Management Plan (SSMP) to reduce the number and severity of Sanitary Sewer Overflows (SSOs). It is further required that the SSMP be audited every two years. The information contained herein is a report of the sixth required biennial audit of the City of Clovis' SSMP since its adoption in 2009, which was recertified in 2019, by the Clovis City Council.

Since the adoption of the WDR by the SWRCB in 2006, and the required implementation from collection system operators in 2009, there have been only minor changes to the WDR in reporting of SSOs and categorization of SSOs. The changes better reflect the physical distribution of SSO events and subsequent areas of impact. The changes in the WDR have resulted in no significant changes for operations staff.

This biennial audit of the City of Clovis' SSMP consists of sufficiency ratings on all 11 elements of the City of Clovis' SSMP. All elements were found to be sufficiently compliant during this audit. Commentary on improvements or enhancements is included in the narrative sections of pertinent section elements.

During fiscal years 2019/2020 and 2020/2021, the City of Clovis sanitary sewer collection system underwent minimal system changes. Development within the collection system service area has been rapid with residential development leading the way. The southeast Loma Vista service area remains the primary area of development with infill residential housing projects to the northeast and new residential housing tracts continuing to develop in the planned northwest village Heritage Grove area. Commercial growth along the Herndon Avenue corridor continues and there has been an increased focus on multifamily housing throughout Clovis. The Loma Vista service area is more than 60 percent built out within the master-planned service area with adequate sewer capacity. Master-planned facilities are being installed in Heritage Grove as developments are approved. The Wastewater Master Plan Update Phase 3 details how this area will be served including future infrastructure. During the past two years, no new major facilities or projects have been initiated or completed which would impact how the collection system operates. One new residential lift station has been added to the system during this audit period. Since the first SSMP audit in 2015 the sanitary sewer collection system has grown steadily from 342 miles of sewer mains in 2013 to 428 miles in 2021; a 20 percent increase in the past eight years. The collection system remains well-positioned to safely and effectively convey sewage waste throughout Clovis to treatment facilities. Operations and Maintenance staff along with Supervisory and Management staff are experienced with nominal turnover.

Introduction

This sixth biennial audit report is submitted in accordance with the City of Clovis' Sewer System Management Plan (SSMP), completed in July 2009, updated in 2014, and again in 2019 in compliance with the State Water Resources Control Board Order Number 2006-0003-DWQ, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (WDR). The City of Clovis' SSMP *Element 10 – Internal Program Audits* requires the Utilities Manager to prepare an internal audit of the City of Clovis' SSMP. The audit shall focus on evaluating the effectiveness of, and the City's compliance with, the requirements of the City of Clovis' SSMP, including the identification of any deficiencies in the City of Clovis' SSMP and identifying steps to correct such deficiencies. The report shall include a short description of each SSMP element, benchmark(s) for the element audit and findings for element compliance, a narrative summary, pertinent reference locations, and any recommendations for element compliance or improvement. Notification on the progress or results of the internal audit shall be posted on the City of Clovis website.

Audit of Element 1 – Goals per State Order D.13.i

This SSMP element identifies the goals of the City of Clovis for the management, operation, and maintenance of the sewer system and discusses the role of the SSMP in supporting these goals. These goals will provide direction to City staff to focus efforts on maintaining the system as well as making improvements.

Audit benchmark: Review the SSMP to determine compliance to State Order by having goals which provide a plan to manage, operate, and maintain the City of Clovis sewer system.

Findings: The City of Clovis established a list of goals in its SSMP that complies with the WDR requirements. Below are the SSMP Element One goals.

2021 Audit Status – Compliant

1. Cost-effectively manage, operate, and maintain all parts of the wastewater collection system. **Meets Goal** Clovis continues to provide sustainable sewer service within the annual budget.
2. Provide adequate capacity to serve new growth areas in the City and peak flow. **Meets Goal** Clovis does not have any current development restrictions due to capacity limitations.
3. Minimize sanitary sewer overflows to no more than one annually per 25 miles of sewer main. **Meets Goal** Clovis is averaging less than 0.25 per 25 miles of sewer main annually. Clovis had four SSOs during this audit period.
4. Mitigate the impact to customers and the environment from sanitary sewer overflows. **Meets Goal** No SSOs resulted in customer damages, outages, or environmental damage requiring mitigation.
5. Maintain all lift stations such that there are no sanitary sewer overflows due to lift station failure. **Meets Goal** No SSOs were caused by lift station failures.
6. Maintain all lift station facilities and grounds to be clean and attractive. **Meets Goal** Grounds are maintained to a satisfactory level by the Parks Department maintenance staff. Wastewater collection maintenance staff continue to maintain lift station facilities and Facility Maintenance staff provide maintenance to select structures and auxiliary equipment.
7. Perform all operations in a safe manner to avoid personal injury and property damage. **Meets Goal** Some accidents or incidents have been caused by employee actions, but largely without injury or significant property or equipment damage.
8. Regularly assess the condition of sewer mains to provide timely rehabilitation and replacement. **Meets Goal** Video inspections and assessments are

- ongoing and provide data for the Clovis Community Investment Program (CIP) program.
9. Maintain and invest in wastewater equipment to enhance system reliability. **Meets Goal** Clovis continues to invest in quality new/additional and replacement equipment for the maintenance and inspection of sanitary sewers.
 10. Provide quick response to customer and contractor inquiries. **Meets Goal** Clovis continues to provide on-call service and track customer interactions via the Customer Relationship Management (CRM) system.

Reference: City of Clovis SSMP 2009, 2014 update and 2019 update, 2020/21 City of Clovis Annual Budget.

Recommendation: None. The City of Clovis is compliant with maintaining/achieving the goals set forth in the 2009 SSMP, 2014, and 2019 updates. Goal maintenance is an ongoing process and is rated by its overall effectiveness in providing consistent service and minimizing SSOs. The rate of SSOs has remained very low during this evaluation period with no environmental impacts.

Audit of Element 2 - Organization per State Order D.13.ii

This section of the SSMP identifies City of Clovis staff that is responsible for implementing the SSMP, responding to SSO events, and meeting the SSO reporting requirements. This section also includes the designation of the Authorized Representative to meet SWRCB requirements for completing and certifying spill reports. This section fulfills the Organization requirement of the SWRCB requirements.

Audit benchmark: Review the SSMP for compliance with the State Order demonstrating adequate representation of staff and legal authorities.

Findings: The City of Clovis has identified staff responsible to meet the requirements of the State Order.

2021 Audit Status – Compliant

Reference: City of Clovis SSMP 2009, 2014, and 2019 updates, Organizational Chart, Chain of communication flow chart.

Recommendation: None. The SSMP 2009, 2014, and 2019 updates provide adequate designations of authorized representatives and responsibilities of staff. Maintenance staff responsible for responding to after-hours calls, emergencies, and SSOs is provided through an “on-call” list which is updated at six-month intervals. Staff is contacted through the 24-hour answering service or the Public Utilities Supervisory Control and Data Acquisition (SCADA) system. The chain of communication has not changed since the SSMP was implemented in 2009. The organizational structure of the Utilities Section has changed very little since the implementation of the SSMP. Construction management ensures City Standards and Specifications are met including inspection staff from the City’s Planning and Development Services department as well as a Senior Engineering Inspector from the Public Utilities Department. The pertinent communication and organizational charts were updated in 2019 as required by the SSMP state order to update every five years following the initial plan implementation. During this audit period, additional maintenance and engineering staff have been hired to keep up with the expanding service area and rapid development within the service area.

Audit of Element 3 – Legal Authority per State Order D.13.iii

This section of the SSMP provides documentation of the City of Clovis' legal authority to regulate uses and discharges, and to regulate construction standards for sanitary sewers within the service boundaries. This authority includes the right to enforce violations.

Audit benchmark: Review the SSMP for compliance with the State Order demonstrating adequate legal authority for the City to operate and regulate, and control discharges within the City sanitary sewer service area.

Findings: The City of Clovis has sufficient legal authority within City policies, the City of Clovis Municipal Code, and through the City of Fresno Municipal Code via a Joint Powers Agreement to prevent, require, ensure, limit, and enforce specific control of discharges. The City of Clovis also has sufficient legal authority to regulate construction of sewer facilities to City of Clovis Standard Drawings and Standard Specifications. The authority granted in the above documents meets the requirements of the State Order.

2021 Audit Status – Compliant

Reference: City of Clovis SSMP 2009, 2014 and 2019 updates, City of Clovis Municipal Code, City of Fresno Municipal Code, Fresno-Clovis Joint Powers Agreement 2003, pretreatment FOG program, City of Clovis Standard Specifications and Drawings 2020, including updates to specific sewer standards.

Recommendation: None. Construction standards and specifications changes and updates are an ongoing process. Significant standard drawing reviews were started in 2020 and continue through 2021. Review of standards and specifications continues to be a joint process between Public Utilities and the Planning and Development Services Departments. Administration and inspection of commercial and industrial service users, including waste stream sampling of select industries to ensure best management practices are being observed, shall continue to be a joint effort between the cities of Clovis and Fresno via Joint Powers Authority and partnership in the Fresno-Clovis Regional Wastewater Treatment Facility.

Audit of Element 4 – Operation and Maintenance Program per State Order D.13.iv

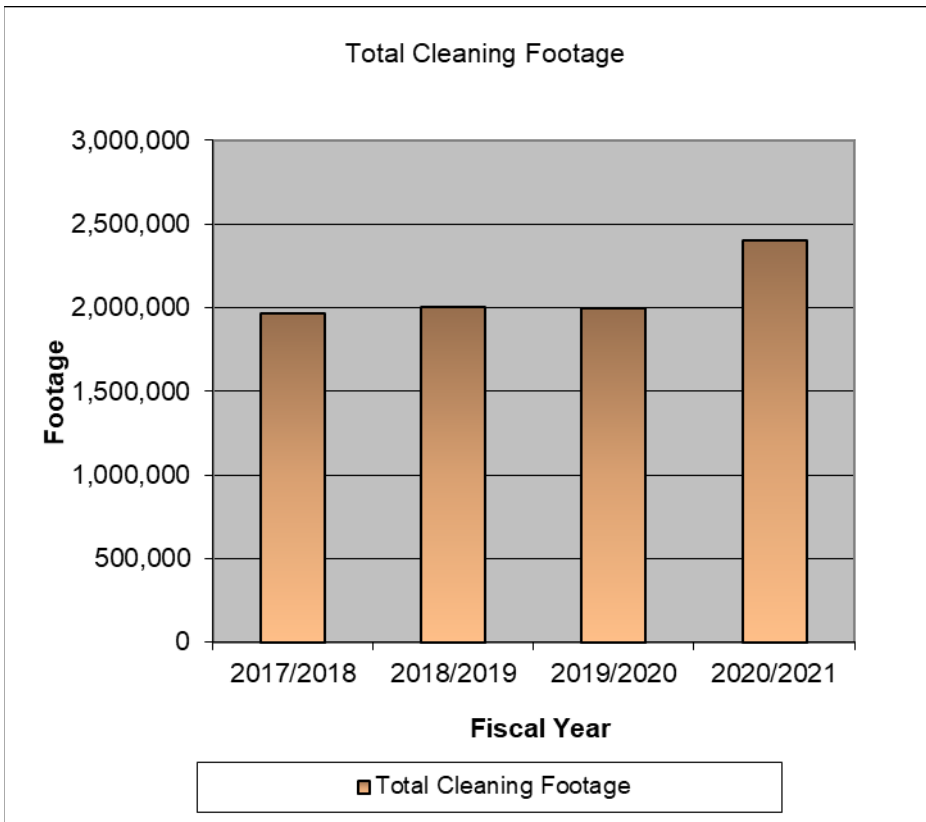
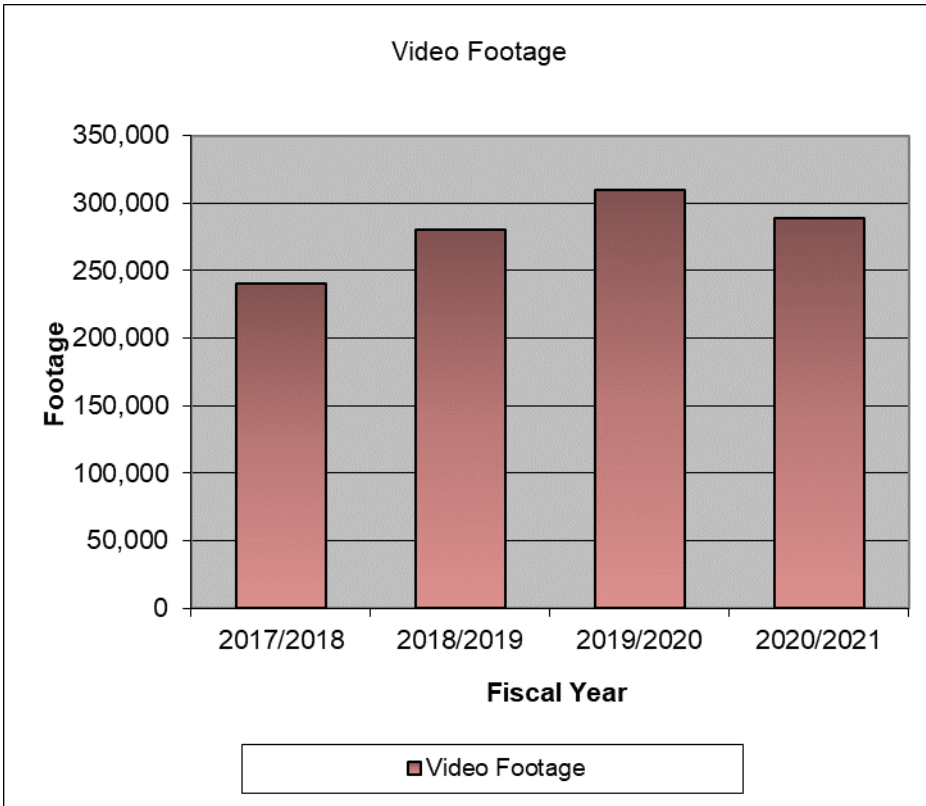
This section of the SSMP provides documentation of the City of Clovis' Operation and Maintenance Program. An essential element of this segment is the accurate mapping of the collection system and maintenance of the mapping system and its appurtenances.

Audit benchmark: Review the SSMP for compliance with the State Order demonstrating adequate maintenance of the collection system using standard industry practices including compliance with system mapping.

Findings: The City of Clovis continues to update system mapping using Geographic Information System (GIS) technology. The Public Utilities Department has dedicated staff to map the system. Public Utilities staff continues to follow standard industry practices to provide maintenance activities throughout the collection system, including the pump and lift stations. The maintenance activities for sewer main cleaning and video inspections during the audit period are included in the charts below. Video inspection production has improved significantly in recent years. During this audit period, the rate of video inspection production to miles of system pipeline meets the Public Utilities Department goal of a ten-year inspection cycle. The inspections segments of the City's trunk sewers still need to be scheduled. This work was discussed in the previous audit but was postponed during COVID 19 when limited employee interactions were heavily practiced. It should be completed during the next audit period. The Public Utilities Department continues to invest to maintain high-level industry-standard video inspection equipment and reporting software. Annual department budgeting continues to invest for planned replacements of such mobile equipment as scheduled. Public Utilities and Engineering staff have been trained on the software which has been incorporated into our video inspection process. Video inspection continues to be the primary method used to develop the rehabilitation and replacement program within the City's Community Investment Program (CIP). The schedule of replacements and rehabilitation continues to be a joint effort between Public Utilities and Planning and Development Services staff. The use of the video software has been deployed

to City Engineering staff for use in designing system replacements.

Sewer main cleaning maintenance continues at a strong pace. Total cleaning production meets a rate of complete system cleaning within a year. Year 2020/2021 saw a slight drop in sewer cleaning productivity which can be attributed to COVID 19 but did not prevent staff from meeting cleaning goals. Routine cleaning frequencies coupled with strategic cleaning is tightly connected to low SSO rates. A third cleaning truck was purchased and put into service during the previous audit period. The addition of a third cleaning truck, a significant investment in maintenance equipment and staff, has increased annual cleaning footage, which is critical to maintaining the City's low SSO rate. Staff development is also a continuing process. Currently, staff remains capable of operating and maintaining the collection system at a high level of reliability. Staff continues to be highly responsive to service demands; the response to the limited number of SSOs has been quick and efficient. Regulatory compliance with training requirements is at a high level with training in key areas of safety. Required staff utilizes the City's SCADA system to look for problems with pump and lift stations and analyze pump problem trends.



2021 Audit Status – Compliant

Reference: City of Clovis Public Utilities Maintenance Log, City of Clovis Public Utilities Sanitary Sewer reports, City of Clovis GIS map system, City of Clovis Public Utilities monthly reports, Public Utilities training schedule, Community Investment Program (CIP), 2020/21 City of Clovis Annual Budget.

Recommendation: None. The Public Utilities Department’s process of recording maintenance activities is ongoing. The department is still reviewing and considering options to integrate the recording of maintenance activities into a GIS mapping/tracking program. Sewer System mapping within the GIS system is also an ongoing process and shall continue. Public Utilities has dedicated engineering staff who continue to update and maintain system mapping. Training is ongoing with emphasis on safety compliance and SSO response and reporting.

Audit of Element 5 – Design and Performance Provisions per State Order D.13.v

This section of the SSMP provides documentation of the City of Clovis' Design and Performance Provisions.

Audit benchmark: Review the SSMP for compliance with the State Order demonstrating adequate design and performance provisions.

Findings: The City of Clovis has identified procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and for identification of rehabilitation and repair projects meeting the requirements of the State Order.

2021 Audit Status – Complaint

Reference: City of Clovis SSMP 2009, 2014 and 2019 updates, City of Clovis Standard Specifications and Drawings 2020 – with subsequent updates, 2020-2021 City of Clovis Annual Budget; Community Investment Program (CIP).

Recommendation: None. Construction standards and specifications changes and updates are an ongoing process with major reviews started in 2020 and continuing into 2022. Review of standards and specifications continues to be a joint process between Public Utilities and the Planning and Development Services Departments.

Audit of Element 6 – Emergency Overflow Response Plan per State Order D.13.vi

This section of the SSMP provides documentation of the City of Clovis' Emergency Overflow Response Plan.

Audit benchmark: Review the SSMP for compliance with the State Order demonstrating that the City has proper procedures in place to respond to sewer overflows including employee response and notifications to the public, affected entities, and other governmental/regulatory bodies as necessary.

Findings: The City of Clovis currently complies with the overflow response and reporting requirements of the State Order and subsequent amendments by following internal procedures and the City of Clovis SSMP. The frequency of SSOs remained very low during this audit period. The City incurred only two SSOs during the previous audit period and four in this current audit period. Although this does represent an increase, the rate of SSOs remains very low. Construction activities and related debris has impacted sewer cleaning operations and caused SSOs. Staff is considering changes to the construction final acceptance process to remove construction debris deposited into the collection system between physical testing of the sewer facilities and final acceptance of the sewer infrastructure improvements by the City. Other SSO events were attributed to debris; grease and rags or shop towels. Staff remain cognizant of the impacts of "flushable" wipes and towels although they have not had a significant impact on City gravity sewers at this time. Most of the impact has been experienced at sewage pump stations. The rate of SSOs is below the goal stated in the SSMP. SSOs have been reported by wastewater staff as required by the State Water Resources Control Board utilizing the online California Integrated Water Quality reporting system. Field staff is trained in SSO response via internal training as well as technical training provided by the California Water Environment Association. Section vehicles are equipped with SSO Field Reports and SSO contact lists.

<u>Event ID</u>	<u>Cert Step</u>	<u>Version</u>	<u>Region</u>	<u>Type</u>	<u>Category</u>	<u>Spill Volume</u>	<u>Collection System</u>	<u>WDID</u>	<u>Spill Start</u>	<u>Location Name</u>	<u>Address</u>
874112	Certified	1.3	5	SSO	Category 3	10	Clovis City CS	5SSO11214	2021-05-17 12:18:00	Roberts and El Dorado	CA
870864	Certified	1.3	5	SSO	Category 3	950	Clovis City CS	5SSO11214	2020-12-08 09:00:00	Locan and Swift	CA
863193	Certified	1.3	5	SSO	Category 3	25	Clovis City CS	5SSO11214	2019-11-05 08:25:00	Clovis	CA
860483	Certified	1.4	5	SSO	Category 3	10	Clovis City CS	5SSO11214	2019-08-09 07:15:00	Santa Ana ave West of Clovis Ave	CA

2021 Audit Status – Compliant

Reference: City of Clovis SSMP 2009, 2014, and 2019 updates, City of Clovis SSO report log, City of Clovis SSO contact list, City of Clovis SSO checklist, City of Clovis organizational chart. <https://ciwqs.waterboards.ca.gov/ciwqs/ssoSearch>.

Recommendation: None. The City of Clovis is compliant with the State Order, and the City of Clovis is compliant with general statewide Waste Discharge Requirements adopted in State Water Board Order 2006-0003-DWQ (SSS WDRs) and the adopted amendments included in WQ 2008-0002-EXEC and WQ 2013-0058-EXEC.

Audit of Element 7 – Fats, Oil, and Grease (FOG) Control Plan per State Order D.13.vii

This section of the SSMP provides documentation of the City of Clovis' Fats, Oil, and Grease (FOG) Plan.

Audit benchmark: Review the SSMP for compliance with the State Order demonstrating the existence of a FOG program including public education, inventory of Food Service Establishments (FSE), regulations to control the discharge of FOG, and authority to inspect and intercede if necessary. Demonstrate adequate legal authority for the City to operate, regulate, and control discharges within the City sanitary sewer service area.

Findings: As decades-long partners in the Fresno-Clovis Regional Wastewater Treatment Facility, the City of Clovis and the City of Fresno have developed a pre-treatment partnership. Per the Joint Powers Agreement, elements of this program include public education and outreach, facility inspections, and the legal authority of enforcement. Included in the facility inspections is the right to view disposal records and physical inspection of on-site grease traps and interceptors. Legal authority of FOG control agents, including the authority to prohibit unauthorized discharges into the collections system and perform inspections, is included in the City of Fresno FOG program in appendix F of this SSMP. The City of Clovis has sufficient legal authority within city policies, the City of Clovis Municipal Code, and through the City of Fresno Municipal Code via the Joint Powers Agreement to prevent, require, ensure, limit, and enforce specific control of discharges. The authority granted in the above documents meets the requirements of the State Order. The City of Clovis, by reference to the City of Fresno Municipal Code, has adopted a Fats, Oil, and Grease Program titled FATS, OILS, & GREASE (FOG) CONTROL PROGRAM contained within The City of Fresno Municipal code article 3 sections 6-321.1. This program requires a FOG Wastewater Discharge Permit for all FSEs. Standards for the construction of grease interceptors are included in the City Standard Drawings issued by the City Engineer. Internal devices are subject to the accepted Uniform Plumbing Code and subject to inspection by the City Building Division.

2021 Audit Status – Complaint

Reference: City of Clovis SSMP 2009, 2014 and 2019 updates, City of Clovis Municipal Code, City of Fresno Municipal Code, Fresno-Clovis Joint Powers Agreement 2003, pretreatment FOG program, City of Clovis Standard Drawings 2020.

Recommendation: None. In the Joint Powers Agreement between the City of Clovis and the City of Fresno, the City of Fresno is designated as the lead agency to monitor pre-treatment wastewater operations including the dischargers of fats, oils, and grease. By agreement, Fresno will continue to provide Clovis with this service as a majority of Clovis' wastewater will continue to be treated at the joint regional facility. The City of Clovis has adopted Fresno's ordinance including the FOG program by agreement. Clovis staff will continue to follow up with FSEs based on data acquired by City of Fresno environmental officers.

Audit of Element 8 – System Evaluation and Capacity Assurance Plan per State Order D.13.viii

This section of the SSMP provides documentation of the City of Clovis' System Evaluation and Capacity Assurance Plan.

Audit benchmark: Review the SSMP for compliance with the State Order, demonstrating adequate system capacity and systematic evaluation of the system's capacity as well as detect any hydraulic deficiencies.

Findings: The City of Clovis has a current Master Plan which meets the requirements of the State Order. In 2017, the Clovis Wastewater Collection System Master Plan (CWCSMP) update was completed. It is designed to provide a plan for the City of Clovis with respect to wastewater service as the city continues to develop. (This update included a capacity study for new growth areas such as the Northwest Service Area which commenced development in 2020.) Current development in the Southeast Service Area- Loma Vista has continued at a rapid pace since the early SSMP audit periods. Major infrastructure facilities for the Southeast Service Area have been in operation for many years and continue to operate well below design capacities. Buildout of the Southeast Service Area is still not anticipated to be completed in the next several years and could slow with development opening in the northwest – Heritage Grove Service Area. Treatment capacities at the City of Clovis WRF remain below the daily capacity of phase one of the facility. Capacity changes in the Fowler Trunk Service Area have been minor with some continued development in the Fowler Trunk Service Area in northeast Clovis, along with infill growth in multiple service areas. Higher density projects are studied for their impacts on existing infrastructure.

Certain elements of the CWCSMP are critical to the City's SSMP, as they focus on the areas of system evaluation and capacity assurance to measure current needs, as well as design and build to meet future system demands. Criteria for pipeline analysis and design were established, including hydraulic elements and pipeline depth limitations. A custom hydraulic computer model was developed to analyze the hydraulics of individual segments of the sewers, utilizing the established hydraulic criteria. A review of all SSOs occurring during the

past ten years revealed none were caused by capacity or hydraulic conditions regardless of weather. If deficiencies are found in the system design or capacity, the City will prioritize replacement projects within the CIP budget. There have been no significant changes to the collection system capacity other than planned growth since adoption of the SSMP in 2009 and 2014 and 2019 updates. City of Clovis staff from Public Utilities, Planning and Development Services, along with outside engineering consulting services, have continued to plan for future growth.

2021 Audit Status – Compliant

Reference: City of Clovis SSMP 2009, 2014 and 2019 updates, 2008 Clovis Wastewater Collection System Master Plan (CWCSMP) and Wastewater Collection System Phase 3 Master Plan Final Draft Report and the 2018 Report on Wastewater Service Considerations for the Northwest Service area, 2014 General Plan, City of Clovis Standard Specifications and Drawings 2020, 2020-2021 City of Clovis Annual Budget; 2020-2021 Community Investment Program.

Recommendation: None. The Clovis Wastewater Collection System Master Plan (CWCSMP) remains a living document with recent updates and reports for new service areas. The Wastewater Master Plan Update Phase 3 Master Report was completed in 2017. The master planning process consisted generally of developing design criteria, defining wastewater service areas including the development of the northwest service area, developing wastewater flow projections, and working with outside engineering consultants to analyze and design collection system pipelines, evaluate service demands, and summarize results. The Wastewater Master Plan Update, Phase 3 addresses planned urban growth in the context of the 2014 Clovis General Plan and 2014 Master Service Plan. Wastewater flow generation and sewer flow calculations for the Master Plan Phase 3 Update were done using a Geographic Information System (GIS) based hydraulic modeling software package.

Audit of Element 9 – Monitoring, Measurement and Program Modification per State Order D.13.ix

This section of the SSMP provides documentation of the City of Clovis' Monitoring, Measurement, and Program Modifications.

Audit benchmark: Review the SSMP for compliance with the State Order demonstrating that the City collects and maintains data relevant to be used in review of the City's SSMP, evaluating the effectiveness of the SSMP, monitoring the effectiveness of maintenance activities, collecting trend data on SSOs, and implementing changes as appropriate.

Findings: The City of Clovis collects data sufficient to meet the requirements of the State Order. Data is collected and maintained in various formats with the Bi-Weekly and Monthly Public Utilities reports being the primary source of public documentation. SSOs are reported and cataloged in the California Integrated Water Quality System (CIWQS) online reporting system, as well as an internal department database. Complaints are collected in the City's Customer Relationship Management (CRM) system where they can be tracked. Report records for sewer main video inspections are maintained in a database, which can be accessed by engineering and maintenance staff. Effectiveness is also evaluated in the City's Annual Budget. The Budget includes performance measures for each department. These are broad goals that measure productivity, efficiency, and effectiveness. The Budget measurements include such goals as sewer-footage cleaning and limits on complaints and stoppages.

2021 Audit Status – Compliant

Reference: City of Clovis SSMP 2009, 2014, and 2019 updates, City of Clovis Bi-Weekly reports, City of Clovis Monthly reports, Public Utilities databases, Customer Relationship Management (CRM), CUES GraniteNet database, 2020-2021 City of Clovis Annual Budget, and the California Integrated Water Quality System (CIWQS).

Recommendation: None. Data documentation can be improved in the future with the purchase and implementation of a Geographic Information System (GIS) maintenance mapping program. Such a program could improve data collection of maintenance activities and integrate current systems used by the wastewater collection system staff such as CUES GraniteNet software.

Audit of Element 10 – Internal Program Audits per State Order D.13.x

This section of the SSMP provides documentation of the City of Clovis' Internal Program Audits.

Audit benchmark: Review the SSMP for compliance with the State Order demonstrating biennial audits as required. The audits shall focus on the effectiveness of the SSMP, compliance with the State Order, and identify deficiencies in the SSMP.

Findings: The City of Clovis Public Utilities Department has conducted audits as required by the State Order. A copy of the final biennial audit has been included with the SSMP as an attachment.

2021 Audit Status – Compliant

Reference: City of Clovis SSMP 2009, 2014 and 2019 updates, 2011, 2013, 2015, 2017, and 2019 SSMP Audits.

Recommendation: None. A copy of the final biennial audit will be included with the SSMP as an attachment and posted to the City of Clovis website.

Audit of Element 11 – Communications Program per State Order D.13.xi

This section of the SSMP provides documentation of the City of Clovis' Communications Program.

Audit benchmark: Review the SSMP for compliance with the State Order.

Findings: The City of Clovis is in compliance with this element of the State Order. Biannual audit is complete and posted to the City of Clovis website as a public document.

2021 Audit Status – Compliant

Reference: City of Clovis SSMP 2009, 2014 and 2019 updates, City of Clovis website: www.ci.clovis.ca.us/

Recommendation: None.

Conclusion

The City of Clovis wastewater collection system is in good to exceeding standards operational condition and compliant with the state order. Field operations, management, and support staff routinely demonstrate a high level of dedication to maintaining all components of the system. The Public Utilities Department continues to invest in equipment and training to maintain system reliability. Sanitary Sewer Overflows have been low in number and have not negatively impacted the environment. City growth during this audit period has been rapid but maintained within planned growth areas. Collection and Treatment systems operate below design capacities with available capacity for growth. Planned development into the northwest service area is in the early stages. The growth area will require expansion of the current sanitary sewer system including a future pump station and force mains which are currently being installed with associated development. Planning for the growth continues to be an active process shared between Public Utilities and Planning and Development staff working in collaboration on design, phasing, and reviewing financial forecasts. With growth comes increased demands for sewer service. Currently, the City of Clovis is well-positioned to meet these demands.