RICHARDSON BAY SANITARY DISTRICT
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July 22, 2026

Foreperson
Marin County Civil Grand Jury
3501 Civic Center Drive, Room #275
San Rafael, CA 94903

Subject: Better Service at Lower Cost – Optimizing Essential Services for the Future of Marin

Dear Judge Freccero,

Enclosed is the Richardson Bay Sanitary District (RBSD) Board of Directors' response to the Marin County Civil Grand Jury Report, Better Service at Lower Cost – Optimizing Essential Services for the Future of Marin. The Board of Directors approved this response at its meeting on July 21, 2026.

After careful review, the Board concludes that the consolidation of a small sewer district is not warranted at this time because it is unlikely to generate meaningful cost savings and may instead increase operating expenses and the cost of sewer service to residents.

The District currently operates efficiently with staffing levels that are appropriately sized to meet its operational and regulatory responsibilities. Consolidation would likely require additional administrative, management, and support personnel to satisfy the organizational structure and reporting requirements of a larger agency. These costs would extend beyond salaries and include retirement pension contributions, workers' compensation insurance, health and dental benefits, payroll taxes, training, and other employee-related expenses.

The addition of permanent staff creates long-term financial obligations that can substantially increase the total cost of service. Pension liabilities, healthcare benefits, and workers' compensation costs represent ongoing commitments that may continue for many years and could outweigh any anticipated efficiencies from consolidation.

In addition, consolidation would likely involve transition costs related to administration, human resources, legal services, information technology systems, and policy integration. These costs would ultimately be borne by the ratepayers who fund the sewer system.

Because sewer services are financed primarily through user rates and service charges, any increase in operating and personnel costs would likely result in higher sewer rates for residents. Without clear, measurable, and sustainable cost savings, consolidation could impose a greater financial burden on customers while providing little or no improvement in service quality, regulatory compliance, or operational efficiency.

Given the District's existing efficient operations and lean organizational structure, consolidation appears more likely to increase costs and raise sewer service rates for residents than to provide meaningful economic or operational benefits.

Richardson Bay Sanitary District (RBSD) response to Findings F1 – F7

F1. The current fragmented structure of special districts results in unnecessary duplication of administrative services and operational inefficiencies.

RBSD disagrees. The existence of multiple special districts does not necessarily result in unnecessary duplication or inefficiency. Special districts are created to provide focused services tailored to the unique needs of their communities, often with greater expertise and accountability than a centralized structure. Many districts operate efficiently with lean staffing and budgets, and their local governance allows for quicker decision-making and responsiveness to residents. While opportunities for collaboration may exist, the assumption that fragmentation inherently causes waste or inefficiency oversimplifies the diverse roles and operational realities of special districts.

F2. Some districts perform competently but lack sufficient scale to support long-term strategic investment in infrastructure, technology, staffing, and resilience.

RBSD disagrees. The size of a special district does not automatically determine its ability to plan for or sustain long-term investments. Many smaller districts are well-managed, financially stable, and capable of making strategic investments in infrastructure, technology, staffing, and resilience tailored to their community's needs. In some cases, smaller scale can even improve efficiency and accountability by keeping governance closer to residents and reducing administrative complexity. With appropriate planning and fiscal management, districts of all sizes can successfully support long-term priorities without requiring consolidation or increased scale.

F3. Smaller districts are disproportionately vulnerable to staffing disruptions and catastrophic events that could rapidly impair service delivery.

RBSD disagrees. Smaller districts are not inherently more vulnerable to staffing disruptions or catastrophic events. Many small districts operate with strong cross-training, mutual aid agreements, and flexible staffing models that allow them to maintain service continuity even during emergencies. In some cases, their smaller size can improve responsiveness and adaptability, enabling quicker decision-making during crises. Vulnerability depends more on planning, resources, and coordination than on size alone, and well-managed districts of any scale can effectively maintain essential services during disruptions.

F4. Although consolidation is a popular idea among many elected board members, current governance structures, absence of board member term limits, and fear of loss of political influence discourage boards and administrators from initiating consolidation even when they recognize its benefits.

RBSD disagrees. The claim that governance structures, lack of term limits, or fear of losing political influence broadly prevent consolidation is not well supported. Decisions about consolidation are typically driven by practical considerations such as service quality, financial impacts, legal constraints, and community preferences—not personal political incentives. In many cases, districts already collaborate or consolidate functions when it is demonstrably beneficial. The absence of consolidation more often reflects legitimate differences in service needs and local priorities rather than structural barriers or resistance from elected officials.

F5. Service and pricing inequities currently exist across Marin and may increase if consolidation and functional collaboration do not accelerate.

RBSD disagrees. There is no clear evidence that service and pricing inequities across Marin are primarily caused by a lack of consolidation or that they will necessarily increase without it. Differences in service levels and costs often reflect local conditions, infrastructure needs, geography, voter-approved service standards, and community priorities rather than structural inefficiencies. Consolidation or expanded functional collaboration does not automatically lead to more equitable or lower-cost outcomes and can sometimes obscure local accountability. Efforts to address inequities should focus on targeted, data-driven solutions rather than assuming that consolidation is the required or most effective remedy.

F6. Performance metrics for essential, mission-specific services exist but they are not readily available and standardized, which prevents meaningful public comparison of district effectiveness and undermines accountability.

RBSD disagrees. While performance metrics may vary across districts, this does not mean accountability is undermined or that meaningful evaluation is not possible. Many special districts already collect and publish service-specific data that reflects their unique missions and operational realities. Standardizing metrics across fundamentally different services can oversimplify complex performance factors and produce misleading comparisons. Accountability is best ensured through transparency, public meetings, audits, and local elections rather than forcing uniform reporting frameworks that may not accurately capture district effectiveness.

F7. Without proactive reform, future consolidations are more likely to occur through crisis-driven intervention, resulting in greater disruption and higher costs.

RBSD disagrees. There is no strong basis to assume that lack of proactive consolidation reform will lead to crisis-driven interventions in the future. Special districts are generally governed through stable legal, financial, and public oversight frameworks that allow for gradual adjustment when needed. In many cases, changes to service delivery or structure occur through planned, deliberative processes rather than sudden interventions. Additionally, consolidation is not inherently the most effective response to challenges, and framing it as inevitable during crises overstates both the risks of inaction and the benefits of structural change.

Richardson Bay Sanitary District (RBSD) response to Recommendations R1 – R9

R1. By January 1, 2027, all special district boards should have conducted their first semiannual consolidation exploration meeting with similar districts and will have established a regular meeting schedule moving forward.

RBSD disagrees. Special district boards should not be required to conduct consolidation exploration meetings or establish an ongoing meeting schedule by a fixed deadline. Consolidation is not appropriate for every district and should be considered only when there is a clear benefit to residents, service quality, or costs. A mandate could create unnecessary administrative burdens and divert time and resources from core services. Local boards should retain the flexibility to determine whether and when consolidation discussions are warranted based on their unique circumstances.

R2. By October 1, 2026, the Board of Supervisors should direct the development of comprehensive, cost-efficient shared services (such as IT, legal, finance, HR/payroll, harmonized compensation/benefits package, insurance) for special districts to optimize expenses and secure a Marin-wide acceptable quality standard. First limited-service offerings are encouraged to be made available by January 1, 2027.

RBSD disagrees. The Board of Supervisors should not direct the development of countywide shared services for special districts by a fixed deadline. Special districts have different sizes, missions, budgets, and operational needs, making a one-size-fits-all approach impractical. Mandating shared services could reduce local control, limit flexibility, and create new administrative costs that outweigh potential savings. Decisions about sharing services should remain voluntary and be pursued only when individual districts determine that doing so will improve efficiency and service quality for their residents.

R3. By January 31, 2027, with the assistance of the County, all districts should develop and publish on their website standardized, comparable Key Performance Indicators

(KPIs) with regard to service pricing, finance, staffing, operations, and customer satisfaction.

RBSD disagrees. Special districts should not be required to develop and publish standardized KPIs by a fixed deadline. Districts vary significantly in size, services, staffing, and operational responsibilities, making direct comparisons difficult and potentially misleading. Developing, tracking, and reporting uniform metrics could impose additional administrative costs and burdens, particularly on smaller districts with limited resources. While transparency and accountability are important, each district should have the flexibility to determine the performance measures that best reflect its services and community needs.

R4. By January 31, 2027, each district should publicly update findings and progress regarding consolidation opportunities, and share those findings with the Board of Supervisors and the public on a semi-annual basis.

RBSD disagrees with the requirement that each district publicly update findings and progress regarding consolidation opportunities by January 31, 2027, and provide semi-annual reports thereafter. This mandate creates additional administrative burdens that may divert staff time and resources away from core services and implementation efforts. Requiring regular public reporting on preliminary or evolving consolidation discussions could also lead to confusion, misinterpretation, or unnecessary concern before proposals have been fully evaluated. Districts should retain flexibility to determine when findings are sufficiently developed to warrant public disclosure and reporting, rather than being bound to a fixed reporting schedule.

R5. By January 31, 2027, the Board of Supervisors should oversee compliance with R1–R4 and update the public on the districts' performance.

RBSD disagrees with the requirement that each district publicly update findings and progress regarding consolidation opportunities by January 31, 2027, and provide semi-annual reports thereafter. This mandate creates additional administrative burdens that may divert staff time and resources away from core services and implementation efforts. Requiring regular public reporting on preliminary or evolving consolidation discussions could also lead to confusion, misinterpretation, or unnecessary concern before proposals have been fully evaluated. Districts should retain flexibility to determine when findings are sufficiently developed to warrant public disclosure and reporting, rather than being bound to a fixed reporting schedule.

R6. By October 1, 2026, in the process of implementing R1 and R2, districts should prioritize functional consolidation in operations, procurement, training, and administration as a precursor to formal consolidation.

RBSD disagrees. Special districts should not be required to prioritize functional consolidation as a precursor to formal consolidation. While collaboration can be beneficial in some cases, not all districts will realize meaningful savings or service improvements through shared operations, procurement, training, or administration. Mandating consolidation efforts may divert resources from core services and reduce local flexibility. Decisions regarding collaboration and consolidation should be made voluntarily by individual districts based on demonstrated benefits, operational needs, and the interests of the communities they serve.

R7. By October 1, 2026, the district's board compensation, benefits, length of service, date of term end, and expenses related to board work should be clearly and prominently posted on each district's website and updated annually.

RBSD disagrees with this recommendation because the district already complies with R7 by publicly disclosing board member compensation, benefits, term expiration dates, and expenses related to Board work. Existing disclosures already promote transparency and accountability.

R8. By June 1, 2027, special districts should adopt term limits of two consecutive four-year terms for all board members. Staggered implementation of term limits to avoid disruptions is encouraged.

RBSD disagrees. Special districts should not be required to adopt term limits of two consecutive four-year terms for all board members by June 1, 2027. Such a mandate would unnecessarily restrict voter choice and could force the departure of experienced, effective board members whose knowledge is critical to overseeing complex district operations and long-term infrastructure projects. Special districts vary significantly in size, mission, and governance needs, making a uniform term-limit requirement inappropriate. Existing elections already provide voters with the ability to hold board members accountable and replace those who are no longer serving the public effectively. While staggered implementation may reduce immediate disruption, it does not address the fundamental drawbacks of mandatory term limits, including the loss of institutional knowledge and potential difficulties in recruiting qualified candidates.

R9. By June 1, 2027, board compensation structures should be reviewed across districts, and considered for adjustment. All components of board compensation should be posted on their website (see best practice example in Appendix B).

RBSD disagrees. Special districts should not be required to review or consider adjusting board compensation by a fixed deadline. Compensation decisions should remain a local matter based on each district's responsibilities, workload, and financial circumstances. A mandated review process may create unnecessary administrative work without providing meaningful benefits. While transparency is important, districts already comply with public disclosure requirements, and additional website posting mandates may not be necessary for all districts. Local boards should retain flexibility in determining how compensation information is communicated to their communities.

Thank you for the opportunity to provide the District's response to the Grand Jury's findings and recommendations.

Regards,

Johnny Tucker
District Manager