
2003-2004 MARIN COUNTY GRAND JURY

TITLE OF REPORT: SOUTHERN MARIN SEWERS – So Many Districts, So Few Users

Date of Report: April 27, 2004

Reports issued by the Civil Grand Jury do not identify individuals interviewed. Penal Code Section 929 requires that reports of the Grand Jury not contain the name of any person, or facts leading to the identity of any person who provides information to the Civil Grand Jury. The California State Legislature has stated that it intends the provisions of Penal Code Section 929 prohibiting disclosure of witness identities to encourage full candor in testimony in Civil Grand Jury investigations by protecting the privacy and confidentiality of those who participate in any Civil Grand Jury investigation.

SOUTHERN MARIN SEWERS – So Many Districts, So Few Users

SUMMARY

Are the sewage collection agencies in Southern Marin so focused on their own needs that their actions may be detrimental to their neighbors and counter to the common good?

The Marin County Civil Grand Jury (Grand Jury) reviewed the operations of the eleven agencies that collect and treat wastewater in Mill Valley, Sausalito, Tiburon, Belvedere, and nearby unincorporated areas. The Grand Jury found that, for the most part, these agencies appear to be operating in a responsible and environmentally sound manner. This unique patchwork quilt of agencies, however, lacks a forum for cooperatively examining issues that transcend district boundaries. This has led to disputes in the past. Moreover, it has meant that one agency can make decisions that can harm another without realizing it. The Grand Jury also concluded that closer collaboration and interaction between the professionals who work for wastewater agencies could lead to improved systems operation and maintenance.

The Grand Jury also found that numerous southern Marin residents are unable to vote for the directors of agencies that impose sewer charges on them, a situation that clearly should be corrected.

The Grand Jury recommends that:

- A periodic forum for interagency information sharing, discussion, and dispute resolution be established
- A facilitator-run meeting of the eleven agencies involved in southern Marin's wastewater collection be held to identify opportunities for consolidation, collaboration, and cooperation
- The opportunities identified in the facilitated meeting become the basis for an in-depth study of consolidation options
- The City of Belvedere should explore the advantages of annexation to Sanitation District Number 5 for wastewater collection and treatment services

BACKGROUND

Marin County has a long history of vigorous support for environmental protection and conservation. Keeping our waters clean and safe is a key component of good environmental stewardship. The Grand Jury received a complaint that focused on a contract between two southern Marin County districts responsible for wastewater collection and treatment which would have resulted in the installation of additional facilities and created financial hardship for several agencies. The Grand Jury expanded its investigation of the complaint to evaluate whether the people of southern Marin County and the environment would be better served if there were changes in the governmental structure that provides sewage collection and treatment.

METHODOLOGY

The Grand Jury conducted interviews with professional staff from eleven governmental agencies in the study area, elected representatives from two agencies, and representatives from other government organizations. The Grand Jury also reviewed extensive documentation, including:

- Current budgets from each of the eleven government agencies
- Minutes, audit reports, policy statements, and ordinances from the eleven agencies
- County Registrar of Voters records for all elections by special districts in the past twenty years
- County Auditor-Controller records concerning sewer use fees charged by Marin government agencies
- Reports regarding consolidation dating back to 1967
- Marin Local Agency Formation Commission (LAFCO) documents relevant to operation and consolidation of the southern Marin sanitary districts

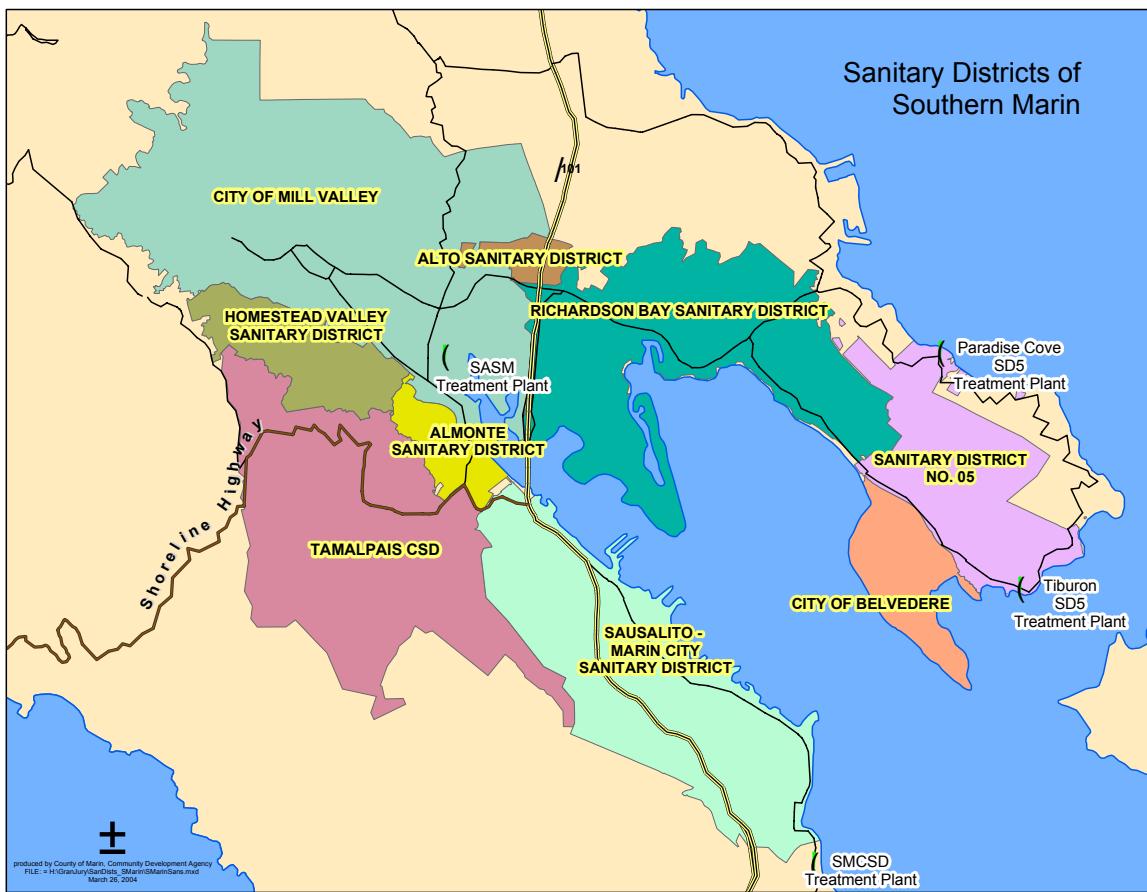
DISCUSSION

Under California law, several types of governmental agencies can be authorized by citizens to collect and treat wastewater. Cities, towns, sanitary districts, and community service districts all perform these services within the southern Marin area. This report focuses on Tiburon, Mill Valley, Sausalito, Belvedere, and the unincorporated areas surrounding these municipalities, including Marin City, Strawberry, Tam Valley, Homestead Valley, and other smaller enclaves. There are three major wastewater **treatment** plants within this area and two small treatment plants on the "back" (north) side of the Tiburon peninsula. These five plants are operated by three different agencies and one private organization. Wastewater **collection** in the area is provided by ten agencies, each having some arrangement with one or more treatment plant operators.

Southern Marin is a patchwork quilt of overlapping city and special district boundaries. Currently, sewer service in the area is provided by agencies as small as Alto Sanitary District (which serves less than 1000 people) and as large as the City of Mill Valley, (which serves over 13,000 people). Figure 1 depicts these agencies' boundaries.

Following is a description of the districts pictured in Figure 1. below:

- Almonte Sanitary District (Almonte) is responsible for wastewater collection in the unincorporated area southeast of the City of Mill Valley. Wastewater is conveyed to the Sewage Agency of Southern Marin (SASM) treatment plant.
- Alto Sanitary District (Alto) provides wastewater collection for areas east of Mill Valley, on both sides of Highway 101, including Sutton Manor and Alto. Wastewater is conveyed to the SASM treatment plant.
- The City of Belvedere (Belvedere) is responsible for the wastewater collection system within its city limits and contracts with Sanitary District No. 5 of Marin County (SD5) for wastewater treatment.

Figure 1. Southern Marin Sewer Agencies

- Homestead Valley Sanitary District (Homestead) serves Homestead, south of Mill Valley. Wastewater is conveyed to the SASM treatment plant.
- The City of Mill Valley (Mill Valley) operates the sewer system within its city limits. Wastewater is conveyed to the SASM treatment plant.
- Richardson Bay Sanitary District (Richardson) collects wastewater from Strawberry and the western half of Tiburon. Wastewater is conveyed to the SASM treatment plant.
- Sanitary District No. 5 of Marin County (SD5) serves the eastern half of Tiburon with a collection system and a wastewater treatment plant on Paradise Drive, just east of downtown. The district also operates a small treatment plant on the north side of the Tiburon peninsula.
- The Town of Sausalito (Sausalito) operates a wastewater collection system and conveys wastewater to the Sausalito-Marin City Sanitary District treatment plant.
- Sausalito-Marin City Sanitary District (SMCSD) provides wastewater collection for Marin City and treatment at a plant south of Sausalito, on Fort Baker Road.
- Sewage Agency of Southern Marin (SASM) operates a wastewater treatment plant in Mill Valley, across from Mill Valley Middle School and Bay Front Park. SASM is a joint powers

agency governed by representatives of its six member agencies (Alto, Almonte, Homestead, Richardson, Tamalpais, and Mill Valley).

- Tamalpais Community Services District (Tamalpais) is responsible for wastewater collection in the Tamalpais Valley region, and conveys wastewater to both the SASM plant and the SMCSD plant. Tamalpais also is responsible for garbage collection and operation of parks and recreation services within its boundaries.

The Town of Tiburon does not provide wastewater collection services to its residents; that service is provided by either Richardson or SD5.

Each of the agencies above (except SASM) is governed by an elected five-member board of directors and employs a part- or full-time manager and, in some cases, staff. A total of 50 elected officials and 41 employees play a role in southern Marin's wastewater collection and treatment.

Table 1: Agency Summary

Agency	Collects Wastewater	Treats Wastewater
Almonte Sanitary District	X	
Alto Sanitary District	X	
City of Belvedere	X	
Homestead Valley Sanitary District	X	
City of Mill Valley	X	
Richardson Bay Sanitary District	X	
Sanitary District No. 5 of Marin County	X	X
Town of Sausalito	X	
Sausalito-Marin City Sanitary District	X	X
Tamalpais Community Services District	X	
Sewage Agency of Southern Marin		X

Many Districts, Few Customers

The southern Marin area served by the eleven agencies listed above has a population of approximately 55,000. In contrast, in other parts of the Bay Area, hundreds of thousands of residents are served by a single sanitary district. That eleven government agencies in southern

Marin play a role in wastewater treatment and collection is an historical artifact of the 1940's and 1950's, when many unincorporated areas had need for sewers but did not want to annex to the cities of Mill Valley, Tiburon, or Sausalito. Historically, a community, regardless of town and city boundaries could band together to form a sanitary district whenever there was a common interest in doing so.

If you look at sewer services in southern Marin today, you see a number of situations that, unless you have district boundaries in mind, would seem strange, even bizarre. Refer to Figure 2 below for the following example: If you live in Tiburon, on Tiburon Boulevard southeast of Gilmartin Drive, your wastewater will be conveyed directly to the SD5 treatment plant in Tiburon (one and half miles away), treated and discharged at Racoon Strait. But if you live next door, west of Gilmartin Drive, your wastewater will go to the SASM treatment plant in Mill Valley, where it will be treated and, with the rest of the wastewater that SASM treats, be conveyed back along Tiburon Boulevard (a total distance of ten miles) – for discharge at Racoon Strait! Why? Historically, the Richardson/SD5 boundary was drawn to maximize the use of gravity flow to treatment plants, and the Richardson treatment plant was located near Blackie's Pasture. As environmental standards for wastewater treatment were raised, the Richardson plant was converted to other uses and the City of Mill Valley's plant (now SASM) began to treat Richardson waste. However, SASM's old discharge point into Richardson Bay was not environmentally acceptable, and a main was constructed to convey treated waste to a discharge point shared with SD5 on Racoon Strait.

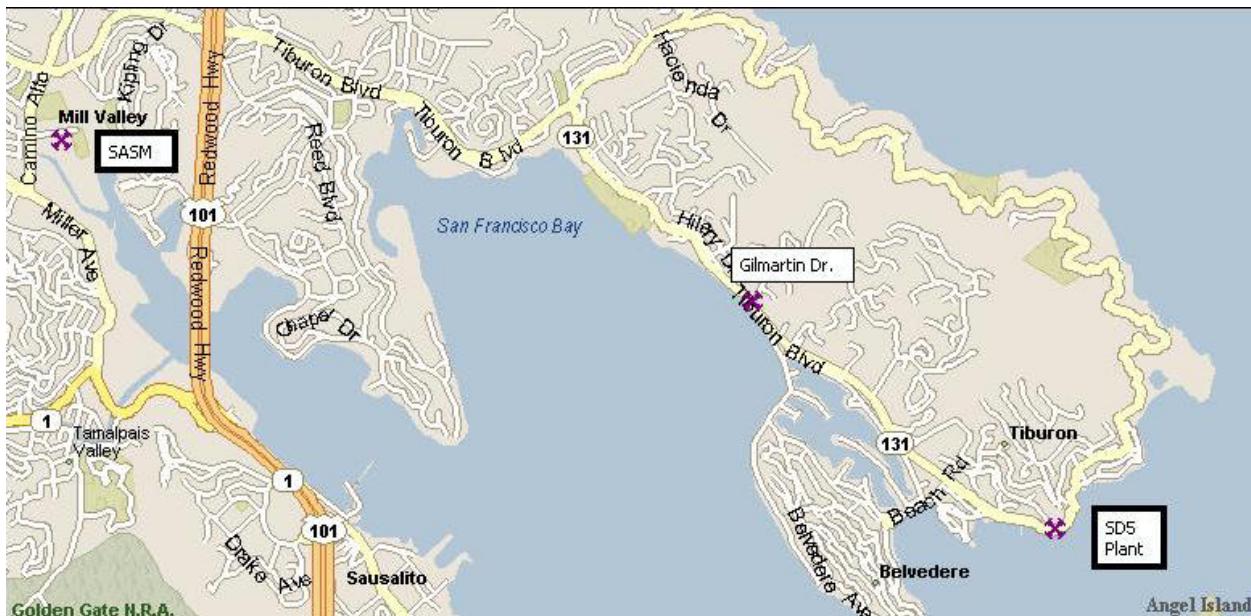


Figure 2. SD5 and SASM Plants Relative to Gilmartin Drive.

The Grand Jury identified several situations similar to the one above. Does it make sense to pay the capital costs to change the current sewer system and convey some of Richardson's wastewater to SD5, or is it more sensible to continue to pay the energy expense of conveying wastewater seven times as far? An engineering study is needed to provide the answer. What concerned the Grand Jury was that no agency has been willing to initiate such a study. It seems agency boundaries are an impediment to cooperative action and problem resolution.

The Grand Jury determined that there were ongoing efforts by the Marin Local Agency Formation Committee (LAFCO) to promote a study of consolidating some of the patchwork quilt of agencies that are involved in sewage collection and treatment in southern Marin. LAFCO is charged by the State with the responsibility for improving the efficiency and reducing the cost of local government. It does so by reviewing and approving changes to city and special district boundaries and conducting special studies to facilitate efficient government operations. However, LAFCO's staff is small and its budget is not large. Therefore, LAFCO proposed to the southern Marin sewer agencies that a consultant be hired to fully evaluate the consolidation options available, with each agency footing part of the bill. Only half of the agencies have shown an interest in participating in such a study; therefore the LAFCO proposal is stalled.

One Citizen, No Vote

Despite the multitude of governmental agencies involved, the Grand Jury learned of a number of anomalies that are tantamount to taxation without representation. The entire City of Belvedere, although it provides its own wastewater collection system, depends on the facility operated by SD5 in Tiburon to treat its waste. However, the population of Belvedere is not part of SD5, and therefore has no representation in the governance of this district. SD5 bills the City of Belvedere for treatment costs, and Belvedere passes that charge on to its taxpayers. Similarly, Tamalpais is served in part by the SMCSD, but has no voting representation on the SMCSD board. The Grand Jury is not offering an opinion concerning the appropriateness of the amounts charged by SD5 and SMCSD. Regardless, in both of these situations, southern Marin residents are being charged sewer use fees by an agency but have no opportunity to elect a representative to that agency's board of directors.

Wastewater Treatment System Operation

The Grand Jury had concerns that the multitude of agencies involved might be adversely affecting the efficient and effective operation of the wastewater treatment plants in the study area. In the course of our interviews we were impressed with the operation of the three major wastewater treatment plants in the area operated by SASM, SMCSD and SD5. Permits issued by the California Regional Water Quality Control Board to these treatment plants specify numerical limits to pollutants discharged. We received no information suggesting that there were either frequent violations of these limits, or widespread complaints from nearby residents. That is not to say that there are no issues that the treatment plants must address on a continuing basis. The SD5 and SASM plants are in the midst of populated areas and need to be sensitive to odor problems.

All wastewater treatment plants in the area have problems with increased flows during wet weather, as rain and runoff water percolate through the soil and seep into cracks and open joints in the wastewater collection system. Termed "infiltration" in the trade, this introduction of essentially clean water into the system can result in ten times the normal amount of wastewater arriving at treatment plants. Engineers design wastewater treatment plants with normal, dry weather flows in mind. It is too expensive to build plant capacity that would only be used a few days a year. Plants are therefore designed with ways of either holding excess wastewater for treatment at a later time when flows have decreased, or providing a reduced level of treatment. Since the infiltration is essentially pure rainwater, the concentration of contaminants in the incoming wastewater at the plant is reduced significantly, so that a reduced

level of treatment can usually meet permit requirements. Nonetheless, there are finite limits to the amount of wastewater that can be handled at the treatment plant and conveyed through the collection system. From the treatment plant operators' perspective, the more that infiltration is minimized, the better.

Another type of infiltration occurs in Southern Marin regardless of rainfall. Many bayside sewer pipes can experience infiltration of salt water into the collection system during high tides. Not only does this extra flow cause needless treatment at the plants, but the presence of sodium in the water makes treatment more difficult.

The Grand Jury found that all of the wastewater collection system operators were taking positive action to reduce infiltration, although some have done more than others. Correcting infiltration is, in most cases, neither easy nor cheap. The most frequent causes of infiltration are breaks in clay pipes, and pipe joint misalignment. Tree root intrusion, careless use of construction equipment, or settling of the land can contribute to this problem. In order to identify the problems in the wastewater collection system, a small television camera is used to collect information on the entire system. Problems are prioritized, and sewer pipes are either excavated and replaced, or "slip-lined" by inserting plastic pipe inside the existing pipe. Identifying trouble spots in the collection system can be time consuming, and repairing or replacing broken lines can be very expensive. This is a major reason why sewer fees increase. Districts and municipalities that have taken action early have saved their ratepayers money, as construction costs have continued to rise. Combining the eleven agencies would better assure that the issues influencing infiltration would be addressed comprehensively rather than piecemeal.

The Grand Jury often heard concerns from treatment system operators and collection system managers alike, about upcoming collection system regulations. New federal sewer system overflow regulations will tighten requirements on collection system operators to ensure that infiltration is minimized and sewers adequately maintained. The new regulations will likely increase sewer maintenance staffing needs and costs. As Alto, Almonte, and Homestead have no maintenance staff on their payrolls, the implications for these districts is significant.

A related concern is that, because SASM has no direct control over wastewater collection in its treatment area, and SMCSD controls only a small part of the collection system feeding its treatment plant, there are institutional barriers between problem and solution. The agencies that operate these treatment plants need the agencies that operate collection systems to reduce the infiltration problem in their systems, but have no direct control over how much wastewater is delivered to them.

Planning and Coordination

When interviewees from the eleven agencies were questioned about their attitude regarding consolidation, no one argued against an investigation of the possibility. What the Grand Jury did hear, to our surprise, was that few interviewees had a good understanding of the points of view of other agencies. When we probed further, we found that there was no forum for all eleven agencies to explore possible efficiencies, cost savings, and each other's viewpoints. There is a monthly meeting of a single elected representative of the six SASM member agencies, and a monthly meeting of the three treatment plant operators. One board member

commented to us that LAFCO's efforts to have a consultant study consolidation were premature. The opinion was expressed that the agencies themselves needed to come to basic agreement as to what options were possible and which were totally impossible.

The most conspicuous failure of the current sewer district patchwork is the inability to plan logically for the future without regard to district and municipal boundaries. This has led to some rather ludicrous situations in the past. For example, part of the wastewater flow from Tamalpais goes to the SASM plant in Mill Valley and part goes to the SMCSD plant in Sausalito. Tamalpais pays each plant for wastewater treatment services. Shopping to get the best price for its ratepayers, Tamalpais investigated rerouting all of its flow to SASM. Such a move would cause major financial problems for SMCSD, because it would need to spread its fixed costs over a smaller user base. Under the terms of its contract with Tamalpais, SMCSD would also have to refund approximately \$2,000,000 that Tamalpais contributed to SMCSD capital costs.

Indications are that Tamalpais will not pursue this option. Their inquiry, however, shone a spotlight on the fact that one district could act in the interest of their constituents but to the detriment of other Marin residents, both financially and environmentally.

The Grand Jury concluded that the lack of coordination and consultation between sewer agencies is not a case of an overseeing state or county agency being derelict in its duties. No organization is charged with the responsibility of ensuring, on a continuing basis, that local sewer agencies act for the common good. While Marin LAFCO is responsible for defining and approving agency boundaries and conducting special studies, LAFCO has no ability to mandate joint action. Neither is LAFCO authorized to conduct the type of detailed engineering and environmental studies that are needed to evaluate alternatives like the SMCSD-Tamalpais situation or the Tiburon situation described before Figure 2.

The Case For – And Against – Small Districts

The case was repeatedly made to the Grand Jury that small special districts like Almonte and Homestead Valley serve a valuable role in their communities. They are accessible to their customers in a way that larger, more impersonal agencies cannot be. More than one district board member reported being stopped on the street by a constituent who had a sewer problem. The districts function as a focal point in communities that have no government other than Marin County to represent them. Small special districts know their local situation well, even to the point where individual district board members are aware of which sewer lines require frequent maintenance.

The Grand Jury also heard testimony that questioned whether the multitude of districts in the area made any sense. The interviewees' point was that it can't be efficient to have so many board members and employees of different districts in an area so small. Some also indicated that there was likely duplication of effort among the districts.

One might think that the small size of many of the special districts, and the fact that many of the district manager positions are part-time, would mean that it would be difficult to attract high quality personnel to staff positions in the districts. To the contrary, the Grand Jury was uniformly impressed by the knowledge, experience, and professionalism of the managers we interviewed. The districts have been creative in their use of personnel to accomplish their mission. Semi-retired managers with years of experience are in charge of several districts. One

part-time manager spends the rest of his time at SASM as a treatment plant operator. Two districts share the same manager. Several managers and staff have had extensive experience with large agencies outside of Marin. Many have worked with their treatment plants or collection systems for decades. The upshot is that the small size of the districts does not appear to be a major detriment to attracting capable staff.

The Grand Jury's conclusion was that most of the cited advantages and disadvantages of small districts were illusory. If these districts were the focal points of local communities, one would expect the public to occasionally attend board meetings or to contest a board election. By their own admission, districts seldom had members of the public attend their board meetings, and a contested election was a rare event. While some community members may know their local sanitary district board member by sight, we question whether that is common. We do know that when customers phone one of the small special districts they are answered not by a human voice, but by an answering machine that tells them that if their problem is urgent they should call Roto-Rooter, a private company that works under contract to almost all of the special districts. Roto-Rooter investigates the issue. If the problem is in the district system, Roto-Rooter resolves it and bills the district. If the problem is in the homeowner's piping, the homeowner has the option of either retaining Roto-Rooter at his own expense or resolving the problem another way.

Similarly, the most frequently cited disadvantage of the many special districts, inefficiency, is illusory. The small districts appear to be very cost-effective for their local areas, keeping spending down to an absolute minimum. Almonte, Alto, and Homestead Valley districts have no full-time employees. As previously noted, most rely on Roto-Rooter for sewer maintenance, so there is no continuing overhead expense. District Board members receive only token compensation, and the Grand Jury did not identify any large economies of scale that could arise from combined management.

It is true that district board members know their community well, and the Grand Jury saw no evidence to suggest that board members are anything other than public-spirited individuals who are dedicated to good service and low sewer rates. It is also true that public attendance at district board meetings and a contested election for a district board is rare. It is troubling that there is no watchdog individual or group as is so often seen at meetings of other, larger, public agencies. A larger sewer authority might attract more attention and get more public input.

The Grand Jury found that the biggest disadvantage of small districts was at the root of the complaint that began our investigation. Each district, responsible only to a small constituency, and striving to keep its rates low, has the potential to make decisions that are harmful to other agencies. Actions can be taken by one district that either seriously affect another district or are detrimental to the region as a whole. At some interviews, we heard that a district was grappling with problems that another district had just solved. Regionalization could bring to the table a view of southern Marin that is neither parochial nor blinded by political boundaries. In the area of wastewater collection and treatment, it should be logic, good engineering, cost-effective solutions, and environmental protection **for the entire region** that rule the day. If these districts were combined, the resulting staff might well contain the perspective and skills needed to achieve these objectives. The Grand Jury cannot leave this topic without pointing out that it talked with district and city personnel whose knowledge and enthusiasm for specific topics, like sewer rehabilitation or asset management, was obvious and refreshing. The Grand

Jury believes that the wastewater professionals in southern Marin could readily bring their expertise to a wider geographic area if there were an uncomplicated way for this expertise to cross district boundaries.

Consolidation Possibilities

If the Grand Jury were starting with a blank sheet of paper, it could envision a single agency operating all of the wastewater collection and treatment facilities in Southern Marin. Viewing the current status quo, it is hard to see how such a change can take place without a powerful ground swell of public opinion to move it along. Interestingly (but not surprisingly), many district representatives did see the value of dispensing with or consolidating districts **other** than their own. But, as we were told "they've been studying that since the Sixties and it hasn't happened yet."

A single district would not be easy to create. The California state legislation that created local area formation commissions in 1963 was intended, among other things, to ensure that special districts did not spring up willy-nilly without the concurrence of existing governments. In southern Marin, special districts had already established themselves before the LAFCO law passed, and there is no easy way of arranging for them to consolidate, even if their communities and elected boards were 100% behind such a move. The Grand Jury sought examples of such mergers from other parts of the state, and found few. This is obviously not a common situation. As best we can understand, if two districts did want to merge, the voters in those districts would have to simultaneously approve a new "super-district" and abolish the old districts. The more districts involved in this consolidation, the more complicated it becomes.

In southern Marin the situation is made more complex by the presence of multiple **types** of agencies. In other words some agencies do more than just waste water collection and/or treatment. Only like districts can merge. Each type of government – in this case municipality, sanitary district, and community service district – has its duties described and limited by a separate piece of California law. Because a community services district (such as Tamalpais, which handles wastewater, garbage collection, and parks and recreation) cannot merge with a sanitary district or a city, a far more complicated annexation process would have to take place.

A joint powers agency that assumed some of the duties of the individual special districts and cities is another possibility, with the specific boundary crossing duties negotiated with all the affected agencies. That this is possible is evidenced by SASM, which is governed by representatives of six different agencies, with management (personnel, accounting, procurement, etc.) provided by one of the member agencies (Mill Valley). A joint powers agreement could enable the eleven agencies to share personnel, expertise, and physical resources more easily and evaluate area-wide technical issues.

Clearly, in the situation that these eleven agencies are in, with no overriding mandate to confer and collaborate, it is easy to opt to conduct business as usual. It will require the initiative of each of the agencies to move forward and explore the possibilities that the Grand Jury has pointed out in this report. The Grand Jury recognizes the difficulty of this first step, and encourages LAFCO to use its good offices to aid the agencies. It is suggested that, rather than funding a consultant to prepare reports that may be ignored, LAFCO hire an impartial facilitator to forge initial agreements between all of the agencies regarding desirable improvements.

Future reports could then be based on a firm foundation, and focus on how best to achieve these improvements.

FINDINGS

- F1. It is unusual for an area as small as southern Marin to be served by so many sewage collection and treatment agencies.
- F2. The sewage treatment plants in southern Marin are operated in conformance with applicable State and Federal law and regulations.
- F3. The eleven agencies charged with the responsibility for sewage collection and treatment in their jurisdictions in southern Marin appear to be operating satisfactorily.
- F4. Belvedere residents and some Tamalpais residents have no elected representatives on sanitary district boards that impose charges on them.
- F5. Having the responsibility for sewage collection and treatment spread between so many agencies inhibits the investigation of issues that cross agency boundaries.
- F6. One agency is occasionally pitted against another as it seeks the lowest cost service for its constituency.
- F7. The public is neither vigilant nor knowledgeable about the management of the agencies that perform sewage collection and treatment, and about the price they pay for these services.
- F8. Southern Marin sewage agencies have secured the services of experienced, competent professionals to manage their affairs.
- F9. Sewage collection and treatment agencies have generally monitored the condition of their systems and planned for rehabilitation in a timely fashion.

RECOMMENDATIONS

- R1. A forum should be established, and meet regularly, as a way for staff and elected officials from all eleven sewage agencies to exchange ideas and experiences.
- R2. An impartial facilitator should be engaged to conduct a meeting of agency representatives at which opportunities for consolidation, collaboration, and cooperation are explored and short-term objectives set.
- R3. After the facilitated meeting is held, based upon consensus regarding consolidation established by the agencies, LAFCO should proceed with a study of alternatives.
- R4. The City of Belvedere should consider the possible advantages of annexing itself to Sanitary District 5 for purposes of wastewater collection and treatment.

REQUEST FOR RESPONSES

Pursuant to Penal code section 933.05, the grand jury requests responses as follows:

- Almonte Sanitary District to F5, F6, R1, R2, and R3.
- Alto Sanitary District to F5, F6, R1, R2, and R3.
- The City of Belvedere to F4, F5, F6, R1, R2, R3, and R4.
- Homestead Valley Sanitary District to F5, F6, R1, R2, and R3.
- The City of Mill Valley to F5, F6, R1, R2, and R3.
- Richardson Bay Sanitary District to F5, F6, R1, R2, and R3.
- Sanitary District No. 5 of Marin County to F4, F5, F6, R1, R2, R3, and R4.
- The Town of Sausalito to F5, F6, R1, R2, and R3.
- Almonte Sanitary District to F5, F6, R1, R2, and R3.
- Sausalito-Marin City Sanitary District to F4, F5, F6, R1, R2, and R3.
- The Sewage Agency of Southern Marin to F5, F6, R1, R2, and R3.
- Tamalpais Community Services District to F4, F5, F6, R1, R2, and R3.

Although not required by law, the Grand Jury also invites responses from:

- The Marin Local Agency Formation Commission to all findings and recommendations.