



BOARD OF SUPERVISORS  
AGENDA LETTER

Agenda Number:

Clerk of the Board of Supervisors  
105 E. Anapamu Street, Suite 407  
Santa Barbara, CA 93101  
(805) 568-2240

**Department Name:** County Counsel  
**Department No.:** 0710  
**For Agenda Of:** February 28, 2023  
**Placement:** Administrative  
**Estimated Time:** n/a  
**Continued Item:** No  
**If Yes, date from:**  
**Vote Required:** Majority

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**TO:** Board of Supervisors  
**FROM:** County Counsel Rachel Van Mullem, (805) 568-2950  
Contact Info: Bo Bae, (805) 568-2950  
**SUBJECT:** 2022 Biennial Review: Amendments to the Conflict of Interest Code of the Buellton Union School District

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**County Counsel Concurrence**

As to form: Yes

**Auditor-Controller Concurrence**

As to form: n/a

**Other Concurrence:**

As to form: n/a

**Recommended Actions:**

That the Board of Supervisors:

- A. Approve the amended Conflict of Interest Code of the Buellton Union School District (Attachment C) and
- B. Determine that the above action is an organizational or administrative activity of the government that will not result in direct or indirect physical changes in the environment and is therefore not a project under the California Environmental Quality Act (CEQA) pursuant to section 15378(b)(5) of the CEQA Guidelines.

**Summary Text:**

The Board of Trustees of the Buellton Union School District adopted its Conflict of Interest Code amendments on September 14, 2022. Amendments to the Buellton Union School District's Conflict of Interest Code are required to delete titles of positions that have been abolished and/or positions that no longer make or participate in making governmental decisions and revise based on updates to disclosure categories. (See Attachment A—2022 Local Agency Biennial Notice; Attachment B—Conflict of Interest Code, Redline Copy; Attachment C—September 14, 2022 Resolution of the Board of Trustees and Conflict of Interest, Clean Copy.)

**Background:**

The Political Reform Act of 1974 requires every local government agency to:

1. Adopt a Conflict of Interest Code identifying the reporting requirements of covered employees,
2. Review the need for any changes to its code biennially, and
3. Submit an amended code to the “code reviewing body” if necessitated by changed circumstances. (Gov. Code, §§ 87300; 87302; 87306.5, subd.(a).)

The Board of Supervisors is designated as the code reviewing body for independent districts and agencies with jurisdiction wholly within the County. (Gov. Code, § 82011, subd. (b).) Once approved by the Board, the Buellton Union School District’s amended Conflict of Interest Code is deemed effective. (Gov. Code, § 87303.)

**Special Instructions:**

Please forward a copy of the minute order reflecting the Board’s action to the Buellton Union School District and Deputy County Counsel Bo Bae.

**Attachments:**

Attachment A—2022 Local Agency Biennial Notice

Attachment B— Conflict of Interest Code, Redline Copy

Attachment C—September 14, 2022 Resolution of the Board of Trustees and Conflict of Interest Code, Clean Copy

**Authored by:**

Deputy County Counsel Bo Bae

**cc:**

Buellton Union School District