



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:** August 24, 2021  
**Placement:** Administrative  
**Estimated Tme:** 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 x82950  
Contact Info: Anne Rierson x82950  
**SUBJECT:** 2020 Biennial Review: Amendments to the Conflict of Interest Code of the Cachuma Operation and Maintenance Board

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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 attached, proposed amended Conflict of Interest Code of the Cachuma Operation and Maintenance Board (“COMB”); 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 Governing Board of the COMB adopted its Conflict of Interest Code amendments on December 14, 2020. Amendments to the COMB’s Conflict of Interest Code are required to reflect updated filing options. (See Attachment A—2020 Local Agency Biennial Notice; Attachment B—December 14, 2020 Resolution of the Governing Board of the COMB No. 721; Attachment C—Conflict of Interest Code, Redline Copy; Attachment D—Conflict of Interest Code, 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 your Board, the COMB’s proposed 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 COMB and Senior Deputy County Counsel Anne Rierson.

**Attachments:**

Attachment A—2020 Local Agency Biennial Notice

Attachment B—December 14, 2020 Resolution of the Governing Board of the COMB No. 721

Attachment C—Conflict of Interest Code, Redline Copy

Attachment D—Conflict of Interest Code, Clean Copy

**Authored by:**

Deputy County Counsel Bo L. Bae

**cc:**

COMB