



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 9, 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 Michael C. Ghizzoni x82950  
Contact Info: Bo L. Bae x82950

**SUBJECT:** 2020 Biennial Review: Amendments to the Conflict of Interest Code of the Montecito Water District

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**County Counsel Concurrence**

As to form: Yes

**Other Concurrence:**

As to form: n/a

**Auditor-Controller 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 Montecito Water District 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 Directors of the Montecito Water District adopted its Conflict of Interest Code amendments on August 25, 2020. Amendments to the Montecito Water District's Conflict of Interest Code are required to revise the disclosure categories and titles of existing positions. (See Attachment A—2020 Local Agency Biennial Notice; Attachment B—August 25, 2020 Minutes

of the Board of Directors; 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 Montecito Water District’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 Montecito Water District and Deputy County Counsel Bo L. Bae.

**Attachments:**

Attachment A—2020 Local Agency Biennial Notice  
Attachment B—August 25, 2020 Minutes of the Board of Directors  
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:**

Montecito Water District