



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  
Carpinteria Valley Water 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 Carpinteria Valley Water District (Attachment B) 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 Carpinteria Valley Water District adopted its Conflict of Interest Code amendments on September 14, 2022. Amendments to the Carpinteria Valley Water District's Conflict of Interest Code are required to revise titles of existing positions, correct a typographical error, and clarify the definition of income. (See Attachment A—2022 Local Agency Biennial Notice; Attachment B—September 14, 2022 Resolution of the Board of Directors and Conflict of Interest Code, Redline Copy ["Attachment '1'"] and Clean Copy ["Attachment '2'"].)

**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 Carpinteria Valley Water 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 Carpinteria Valley Water District and Deputy County Counsel Bo Bae.

**Attachments:**

Attachment A—2022 Local Agency Biennial Notice

Attachment B—September 14, 2022 Resolution of the Board of Directors and Conflict of Interest Code, Redline Copy [“Attachment ‘1’”] and Clean Copy [“Attachment ‘2’”]

**Authored by:**

Deputy County Counsel Bo Bae

**cc:**

Carpinteria Valley Water District