

ARROYO SANTA ROSA VALLEY BASIN
GROUNDWATER SUSTAINABILITY AGENCY

MEMBERS OF THE BOARD

BEN FISCHETTI, *VC Public Works Agency*
HOMER ARREDONDO, *VC Public Works Agency*
JEFFREY C. BROWN, *Camrosa Water District*
TERRY L. FOREMAN, *Camrosa Water District*
TIMOTHY H. HOAG, *Camrosa Water District*
ANDREW F. NELSON, *Camrosa Water District*
EUGENE F. WEST, *Camrosa Water District*

NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that a Public Hearing with the Arroyo Santa Rosa Valley Basin Groundwater Sustainability Agency Board of Directors will be held on:

--Tuesday, September 22, 2026 at 9:45am--

CAMROSA WATER DISTRICT

7385 Santa Rosa Road - Camarillo, CA 93012

The purpose of this public hearing is to give the public an opportunity to comment on the following ordinance prior to adoption:

- Ordinance 39 – Conflict of Interest Code



Norman Huff, Interim Executive Director

ARROYO SANTA ROSA VALLEY BASIN
GROUNDWATER SUSTAINABILITY AGENCY

Camrosa Water District, 7385 Santa Rosa Road, Camarillo, CA 93012

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Ordinance 1-26

CONFLICT OF INTEREST CODE

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Adopted:

September 22, 2026

ORDINANCE 1-26

**An Ordinance of the
Arroyo Santa Rosa Valley Basin Groundwater Sustainability Agency
Amending the Agency's Conflict of Interest Code**

WHEREAS, The Political Reform Act of 1974 (Government Code Section 81000 et seq.) requires state and local government agencies to adopt and promulgate Conflict of Interest Codes; and

WHEREAS, The Fair Political Practices Commission ("FPPC") has adopted 2 California Code of Regulations Section 18730, which contains the terms of a standard Conflict of Interest Code and may be amended by the FPPC to conform to amendments in the Political Reform Act; and

WHEREAS, The terms of 2 California Code of Regulations Section 18730, together with the designation of positions and disclosure categories contained in the attached Exhibits A and B, constitute the Conflict of Interest Code of the Arroyo Santa Rosa Valley Basin Groundwater Sustainability Agency ("Agency"); and

WHEREAS, Government Code Section 87302 requires the Agency's Conflict of Interest Code to identify designated positions that make or participate in making governmental decisions that may foreseeably have a material effect on financial interests and to identify the types of economic interests that are reportable for each designated position; and

WHEREAS, Pursuant to Government Code Section 87306.5, the Agency is required to review its Conflict of Interest Code in each even-numbered year to determine whether amendments are necessary; and

WHEREAS, The Agency has reviewed its Conflict of Interest Code and determined that amendments are necessary to reflect the Agency's current organizational structure, position titles, duties, and disclosure requirements; and

WHEREAS, The Board of Directors has provided public notice of and conducted a public hearing concerning the proposed amendments and has provided an opportunity for interested persons to comment on the proposed Conflict of Interest Code; and

WHEREAS, Pursuant to Government Code Section 82011, the Ventura County Board of Supervisors is the code-reviewing body for the Conflict of Interest Code of the Arroyo Santa Rosa Valley Basin Groundwater Sustainability Agency and must approve amendments to the Agency's Conflict of Interest Code; and

WHEREAS, The Board of Directors desires to approve the proposed amended Conflict of Interest Code and submit it to the Ventura County Board of Supervisors for review and approval.

NOW, THEREFORE, BE IT ORDAINED by the Board of Directors of the Arroyo Santa Rosa Valley Basin Groundwater Sustainability Agency as follows:

SECTION 1. Adoption of Amended Conflict of Interest Code.

The Board of Directors hereby approves and adopts the amended Conflict of Interest Code attached hereto and incorporated herein by reference including Exhibits A and B and Appendix A.

The amended Conflict of Interest Code incorporates by reference 2 California Code of Regulations Section 18730, including any amendments thereto duly adopted by the Fair Political Practices Commission.

SECTION 2. Designated Positions and Disclosure Categories.

The positions designated in Exhibit B are designated positions for purposes of the Agency's Conflict of Interest Code, and the disclosure categories assigned to those positions in Exhibit B establish the types of financial interests required to be disclosed, subject to the provisions of the Political Reform Act and applicable FPPC regulations.

SECTION 3. Statutory Filers and Officials Who Manage Public Investments.

Nothing in this Ordinance or the Agency's Conflict of Interest Code shall be construed to impose duplicative disclosure requirements on a person who is required to file a Statement of Economic Interests pursuant to Government Code Section 87200 et seq. or other applicable law, to the extent such person is subject to the statutory filing requirements in the same capacity.

Appendix A identifies the applicable statutory provisions and regulatory definitions concerning officials who manage public investments.

SECTION 4. Submission to Code-Reviewing Body.

The General Manager, or designee, is authorized and directed to submit the amended Conflict of Interest Code to the Ventura County Board of Supervisors, as the Agency's code-reviewing body, for review and approval.

The General Manager, or designee, is further authorized to make non-substantive revisions to the amended Conflict of Interest Code that may be requested by the Ventura County Board of Supervisors, the Clerk of the Board, or County Counsel in connection with the review and approval process, provided such revisions do not materially alter the positions designated or disclosure categories approved by the Board of Directors.

SECTION 5. Filing Officer.

Statements of Economic Interests required to be filed pursuant to this Conflict of Interest Code by designated positions other than persons subject to Government Code Section 87200.5 shall be filed with the Camrosa Water District, which provides administrative services to the Agency and shall serve as the Filing Officer for such designated positions.

Members of the Agency's Board of Directors and the Agency's Executive Officer, who are required to file pursuant to Government Code Section 87200.5, shall file their Statements of Economic Interests electronically with the Fair Political Practices Commission as required by law.

The Camrosa Water District shall retain Statements of Economic Interests filed with the District pursuant to this Conflict of Interest Code and make such statements available for public

inspection and reproduction as required by Government Code Section 81008 and applicable FPPC regulations.

SECTION 6. Repeal and Supersession.

Upon the effective date of the amended Conflict of Interest Code established by this Ordinance, Ordinance No. 1-24, together with all amendments thereto, is repealed and superseded.

SECTION 7. Severability.

If any provision of this Ordinance or the application thereof to any person or circumstance is held invalid, the remainder of this Ordinance and the application of its provisions to other persons or circumstances shall not be affected thereby.

SECTION 8. Effective Date.

The amended Conflict of Interest Code established by this Ordinance shall become effective upon approval by the Ventura County Board of Supervisors, as the Agency's code-reviewing body, and satisfaction of all other applicable requirements of the Political Reform Act and FPPC regulations.

By Motion of Director _____, Second by Director _____,
this ordinance is

ADOPTED, SIGNED, AND APPROVED this **September 22, 2026**.

Terry L. Foreman, Chair, Board of Directors
ARROYO SANTA ROSA VALLEY BASIN
GROUNDWATER SUSTAINABILITY AGENCY

ATTEST:

Norman Huff, Interim Executive Director/Secretary, Board of Directors
ARROYO SANTA ROSA VALLEY BASIN
GROUNDWATER SUSTAINABILITY AGENCY

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Conflict of Interest Code

1. Purpose

The purpose of the Arroyo Santa Rosa Valley Basin Groundwater Sustainability Agency Conflict of Interest Code is to ensure that public officials and designated employees disclose financial interests that may foreseeably be materially affected by their official decisions and to help prevent actual or perceived conflicts of interest in the conduct of Agency business. The Code identifies positions subject to disclosure requirements, specifies the categories of financial interests that must be disclosed based on the duties and responsibilities of each position, and incorporates applicable requirements of the Political Reform Act and regulations of the Fair Political Practices Commission.

2. Incorporation of FPPC Regulation 18730 by Reference

The Political Reform Act of 1974 (Government Code Section 81000 et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes.

The Fair Political Practices Commission ("FPPC") has adopted a regulation, 2 California Code of Regulations Section 18730, which contains the terms of a standard conflict of interest code. After public notice and hearing, the standard code may be amended by the FPPC to conform to amendments in the Political Reform Act.

Therefore, the terms of 2 California Code of Regulations Section 18730, and any amendments to that regulation duly adopted by the FPPC, are hereby incorporated by reference into the Conflict of Interest Code of the Arroyo Santa Rosa Valley Basin Groundwater Sustainability Agency ("Agency").

The terms of 2 California Code of Regulations Section 18730, together with the attached Exhibit A – Disclosure Categories and Exhibit B – Designated Positions and Disclosure Categories, constitute the Conflict of Interest Code of the Arroyo Santa Rosa Valley Basin Groundwater Sustainability Agency.

This Conflict of Interest Code shall be interpreted and administered in accordance with the Political Reform Act, the regulations of the FPPC, and applicable amendments thereto.

3. Place of Filing of Statements of Economic Interests

Persons holding positions designated in this Conflict of Interest Code shall file Statements of Economic Interests with the Camrosa Water District, acting as the administrative agency for the Arroyo Santa Rosa Valley Basin Groundwater Sustainability Agency ("Agency"), except as otherwise required by the Political Reform Act or applicable regulations of the Fair Political Practices Commission.

Persons who are required to file Statements of Economic Interests pursuant to Government Code Section 87200.5 shall file their Statements of Economic Interests electronically with the Fair Political Practices Commission as required by law.

Because the Agency does not employ separate dedicated staff, employees of the Camrosa Water District who perform functions on behalf of the Agency in their capacity as Camrosa Water District employees shall comply with the disclosure and filing requirements applicable to any position designated under this Conflict of Interest Code. Where a Camrosa Water District employee is designated under this Code, the employee shall file with the Camrosa Water District unless otherwise required by law or regulation.

The Camrosa Water District shall retain Statements of Economic Interests filed with the District pursuant to this Conflict of Interest Code and shall make those statements available for public inspection and reproduction as required by the Political Reform Act and applicable regulations of the Fair Political Practices Commission.

Nothing in this Conflict of Interest Code shall be construed to require duplicative filings by a person who is otherwise required to file a Statement of Economic Interests pursuant to Government Code Section 87200, Section 87200.5, or other applicable law.

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Exhibit A - Disclosure Categories

The following disclosure categories identify the types of financial interests that designated positions are required to disclose. A designated employee is required to disclose only those financial interests identified in the category or categories assigned to the employee's position in Exhibit B.

CATEGORY 1 – REAL PROPERTY

Persons in this category shall disclose all interests in real property located within the jurisdiction of the Arroyo Santa Rosa Valley Basin Groundwater Sustainability Agency.

Real property shall be deemed to be within the jurisdiction if the property or any part of it is located within the Agency or within two miles outside the boundaries of the Agency, or within two miles of any land owned or used by the Agency.

Interests in real property held by a business entity or trust in which the designated employee holds a direct or indirect interest shall be reportable to the extent required by the Political Reform Act and applicable FPPC regulations.

Persons are not required to disclose a residence, such as a home or vacation cabin, used exclusively as a personal residence; however, a residence in which a person rents out a room or for which a person claims a business deduction may be reportable, subject to the applicable provisions of the Political Reform Act and FPPC regulations.

CATEGORY 2 – INVESTMENTS AND BUSINESS POSITIONS

Persons in this category shall disclose all investments and business positions in business entities.

CATEGORY 3 – INCOME, GIFTS, LOANS, AND TRAVEL PAYMENTS

Persons in this category shall disclose all sources of income, including gifts, loans and travel payments, as required by the Political Reform Act and applicable FPPC regulations.

CATEGORY 4 – PROCUREMENT AND CONTRACTING

Persons in this category shall disclose investments, business positions and sources of income, including gifts, loans and travel payments, from business entities that manufacture, provide or sell services, supplies, materials, machinery or equipment of a type utilized by the Agency and associated with the duties of the designated position.

CATEGORY 5 – REGULATION, PERMITTING, AND LICENSING

Persons in this category shall disclose investments, business positions and sources of income, including gifts, loans and travel payments, from sources that are subject to the regulatory, permitting or licensing authority of, or have an application or license pending before, the Agency.

CATEGORY 6 – LAND DEVELOPMENT, CONSTRUCTION, AND REAL PROPERTY TRANSACTIONS

Persons in this category shall disclose investments, business positions and sources of income, including gifts, loans and travel payments, from sources that engage in land development, construction, or the acquisition or sale of real property.

CATEGORY 7 – FUNDING AND GRANTS

Persons in this category shall disclose investments, business positions and sources of income, including gifts, loans and travel payments, from sources that receive grants or other funding from or through the Agency.

Exhibit B - Designated Positions and Disclosure Categories

Italicized positions are Camrosa Water District positions are designated positions when the employees holding those positions perform functions on behalf of the Agency in their capacity as Camrosa Water District employees.

<u>Designated Position</u>	<u>Disclosure Categories</u>	<u>Filing Officer</u>
Board of Directors	1, 2, 3	FPPC – Electronic Filing
Executive Officer/Secretary	1, 2, 3	FPPC – Electronic Filing
Legal Counsel	1, 2, 3	Camrosa Water District
<i>Assistant General Manager</i>	2, 3, 4	Camrosa Water District
<i>Finance Manager/Treasurer</i>	2, 3, 4, 7	Camrosa Water District
<i>Senior Accountant</i>	2, 3, 4, 7	Camrosa Water District
<i>Financial Consultant</i>	2, 3, 4, 7	Camrosa Water District
<i>District Engineer</i>	4, 5, 6	Camrosa Water District
<i>Director of Operations</i>	4	Camrosa Water District
<i>Director of Administration</i>	4	Camrosa Water District
Consultants/New Positions	*See below	Camrosa Water District

*Consultants and new positions are included in the list of designated positions and shall disclose pursuant to the broadest disclosure category applicable to the duties performed, subject to the following limitations.

The General Manager, or the General Manager's designee, may determine in writing that a particular consultant or new position, although a designated position, is hired to perform a range of duties that is limited in scope and, therefore, is not required to fully comply with the disclosure requirements applicable to the position.

The written determination shall include a description of the consultant's or new position's duties and, based upon that description, a statement of the extent of the disclosure requirements.

The written determination shall be a public record and shall be retained for public inspection in accordance with Government Code Section 81008 and applicable FPPC regulations.

An individual who performs under contract substantially all of the duties of a designated position shall be subject to the disclosure requirements applicable to that designated position.

Appendix A - Officials Who Manage Public Investments

Members of the Board of Directors and the Executive Officer of a groundwater sustainability agency are required to file Statements of Economic Interests pursuant to Government Code Section 87200.5. In addition, certain other public officials who manage public investments are subject to Government Code Section 87200 et seq. This Appendix provides the applicable definitions and identifies Agency positions that may qualify under the public-investment provisions.

This Appendix identifies the applicable definitions for determining which public officials qualify as "other officials who manage public investments" and identifies the positions of the Arroyo Santa Rosa Valley Basin Groundwater Sustainability Agency that qualify, or may qualify, under those provisions.

APPLICABLE DEFINITIONS

As set forth in 2 California Code of Regulations Section 18704.6, the following definitions apply for purposes of Government Code Section 87200:

1. "Other Public Officials Who Manage Public Investments"

"Other public officials who manage public investments" means:

(A) Members of boards and commissions, including pension and retirement boards or commissions, or committees thereof, who exercise responsibility for the management of public investments;

(B) High-level officers and employees of public agencies who exercise primary responsibility for the management of public investments, such as chief or principal investment officers or chief financial managers. This category does not include officers and employees who work under the supervision of the chief or principal investment officers or chief financial managers; and

(C) Individuals who, pursuant to a contract with a state or local government agency, perform the same or substantially all the same functions that would otherwise be performed by the public officials described in subdivision (1)(B).

2. "Public Investments"

"Public investments" means the investment of public moneys in real estate, securities, or other economic interests for the production of revenue or other financial return.

3. "Public Moneys"

"Public moneys" means all moneys belonging to, received by, or held by the state, or any city, county, town, district, or public agency therein, or by an officer thereof acting in his or her official capacity.

"Public moneys" includes the proceeds of all bonds and other evidences of indebtedness, trust funds held by public pension and retirement systems, deferred compensation funds held for investment by public agencies, and public moneys held by a financial institution under a trust indenture to which a public agency is a party.

4. "Management of Public Investments"

"Management of public investments" means the following non-ministerial functions:

- Directing the investment of public moneys;
- Formulating or approving investment policies;
- Approving or establishing guidelines for asset allocations; or
- Approving investment transactions.

POSITIONS SUBJECT TO REVIEW UNDER THE PUBLIC-INVESTMENT PROVISIONS

For purposes of Government Code Section 87200 et seq. and applicable FPPC regulations, the following positions are identified for purposes of determining whether the individual holding the position qualifies as an 'other public official who manages public investments' based upon the actual duties and authority of the position.

<u>Position</u>	<u>Filing Requirement</u>
Board of Directors	Government Code Section 87200 et seq., as applicable
General Manager/Secretary	Government Code Section 87200 et seq., as applicable
Assistant General Manager	Government Code Section 87200 et seq., as applicable
Finance Manager	Government Code Section 87200 et seq., as applicable
Financial Consultant*	Government Code Section 87200 et seq., as applicable

A person who qualifies as an "other public official who manages public investments" shall file a Statement of Economic Interests pursuant to Government Code Section 87200 et seq. and applicable FPPC regulations.

The inclusion of a position in this Appendix does not, by itself, establish that every individual holding that position qualifies as an "other public official who manages public investments." The determination shall be based upon the actual duties and authority of the position and the applicable provisions of the Political Reform Act and FPPC regulations.

A person who is required to file a Statement of Economic Interests pursuant to Government Code Section 87200 et seq. shall not be required to file an additional Statement of Economic Interests under this Conflict of Interest Code for the same position and reporting period to the extent provided by applicable law and FPPC regulations.

*Under §18704.6, a contractual person qualifies only if they perform the same or substantially all of the same functions otherwise performed by the high-level public official who has primary responsibility for managing public investments. A financial consultant who merely provides financial advice, accounting assistance, rate analysis, budgeting assistance, or similar services isn't necessarily a public-investment manager. A consultant shall be subject to Government Code Section 87200 only if the consultant performs the same or substantially all of the functions described in 2 California Code of Regulations Section 18704.6(b)(1)(C).