

**BEFORE THE BOARD OF DIRECTORS OF  
THE COLUSA GROUNDWATER AUTHORITY**

**RESOLUTION 2026-03**

**RESOLUTION ANNOUNCING THE INTENT TO ADOPT AN AMENDED CONFLICT-  
OF-INTEREST CODE AND ESTABLISHING A COMMENT PERIOD**

**WHEREAS**, in accordance with the state law, the Board of Directors of the Colusa Groundwater Authority (“Authority”) has reviewed the Authority’s Conflict-of-Interest Code; and

**WHEREAS**, in accordance with that review and state law, the Authority has determined that the Conflict- of-Interest Code was in need of modification; and

**WHEREAS**, Senate Bill 1156, effective January 1, 2025, requires members of the board of directors and executives of groundwater sustainability agencies to annually disclose their economic or financial interests, thereby changing the filing location for their statement of economic Interests (Form 700) to the Fair Political Practices Commission (“FPPC”), which are required to be filed electronically with the FPPC; and

**WHEREAS**, Senate Bill 852, effective January 1, 2026, changed the filing officer for public officials who manage public investments to the FPPC, thereby changing the filing location for their Statements of Economic Interests (Form 700), which are required to be filed electronically with the FPPC; and

**WHEREAS**, in accordance with state law, the Authority has prepared an amended Conflict-of-Interest Code (Exhibit A hereto) and Notice of Intent to reflect such changes; and

**WHEREAS**, state law requires that the Authority provide a 45-day comment period before adopting said Code.

**NOW, THEREFORE, BE IT RESOLVED, THAT:**

1. The amended Conflict of Interest Code, attached hereto as Exhibit A, is preliminarily adopted by the Board of Directors of the Colusa Groundwater Authority.
2. The comment period shall be 45 days and shall begin on September 23, 2026 and end on November 9, 2026.
3. The Board authorizes the Authority’s Secretary to provide the required “Notice of Intention to Amend a Conflict-of-Interest Code” to those parties designated by the preliminarily adopted Conflict-of-Interest Code.
4. Authority staff and consultants are directed to take such further actions as are necessary and appropriate to process the amended Conflict of Interest Code, including, without

limitation, to submit the attached draft of the amended Code to the California Fair Political Practices Commission for review

All the foregoing being on motion of Director, \_\_\_\_\_ seconded by Director,  
\_\_\_\_\_ and authorized by the following vote, to wit:

AYES:

NOES:

ABSENT:

ABSTAINED:

I HEREBY CERTIFY that the foregoing resolution is the resolution of the Authority as duly passed and adopted by the Board of Directors on this 22<sup>nd</sup> day of September 2026.

Witness my hand and seal of said Board of Directors this 22<sup>nd</sup> day of September 2026.

\_\_\_\_\_  
Secretary of the Board of Directors

## **COLUSA GROUNDWATER AUTHORITY**

### **NOTICE OF INTENTION TO AMEND A CONFLICT-OF-INTEREST CODE**

NOTICE IS HERBEY GIVEN that the Colusa Groundwater Authority (“Authority”), intends to amend its Conflict-of-Interest Code (Code) pursuant to Government Code Section 87300 and 87306. Pursuant to Government Code Section 87302, the Code will designate employees who must disclose certain investments, income, interests in real property and business positions, and who must disqualify themselves from making or participating in the making of governmental decisions affecting those interests.

A written comment period has been established commencing on September 23, 2026 and ending on November 9, 2026. Any interested person may send written comments concerning the proposed Code, a copy of which is being concurrently transmitted to you along with this Notice, no later than November 9, 2026 to the Colusa Groundwater Authority at P.O. Box 475, Colusa, CA 95932, or by email to [cthomaskeefer@rgs.ca.gov](mailto:cthomaskeefer@rgs.ca.gov). No public hearing on this matter will be held unless an interested person or his or her representative requests no later than 15 days prior to the close of the written comment period, a public hearing.

The impetus for the adoption of this amended Code are the new disclosure requirements established by the Fair Political Practices Commission (“FPPC”) for public officials responsible for managing public investments and for board of directors and executives of groundwater sustainability agencies. These new requirements stem from Senate Bill 1156, effective January 1, 2025, which requires decision-makers of groundwater sustainability agencies to annually disclose their economic or financial interests and file electronically with the FPPC, as well as Senate Bill 852, effective January 1, 2026, which changed the filing officer for public officials who manage public investments, thereby changing the filing location for their Statements of Economic Interests (Form 700) to the FPPC. As a result, the Board of Directors and their Alternates, and the Program Manager have been removed from the Code’s Designated Positions and recategorized as officials who must now file electronically with the FPPC and are no longer covered by the Authority’s Code. The proposed amended Code, along with all supporting information upon which the proposal is based, is available for review at the Authority’s office. The adoption of the Code will not impose a cost savings to the Authority that is required to be reimbursed under Part 7 (commencing with section 17500) of Division 4 of the Government Code; will not result in any nondiscretionary cost or savings to local agencies; will not result in any cost or savings in federal funding to the state; will not impose a mandate on local agencies or school districts; and will not have any potential cost impact on private persons or businesses, including small businesses. No alternative considered by the Authority would be more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed action

All inquiries concerning the proposed Code should be directed to Carol Thomas-Keefer at P.O. Box 475, Colusa, CA 95932, or by email to [cthomaskeefer@rgs.ca.gov](mailto:cthomaskeefer@rgs.ca.gov).

## **Exhibit A – [Proposed] Amended Conflict of Interest Code**

### **COLUSA GROUNDWATER AUTHORITY CONFLICT OF INTEREST CODE**

The Political Reform Act (Government Code 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 California Code of Regulations 18730) that contains the terms of a standard conflict of interest code, which can be incorporated by reference in an agency's code. After public notice and hearing, the standard code may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This regulation and the attached Appendices, designating positions and establishing disclosure categories, constitute the conflict of interest code of the **Colusa Groundwater Authority (Authority)**.

**Designated Positions** shall file their statements with the **Authority**, which will make the statements available for public inspection and reproduction. (Gov. Code Section 81008) Statements for all designated employees will be retained by the **Authority**.

## APPENDIX OF DESIGNATED POSITIONS

### **Designated Positions**

| DESIGNATED POSITIONS      | DISCLOSURE CATEGORIES |
|---------------------------|-----------------------|
| Legal Counsel*            | 1, 2                  |
| Consultants/New Positions | **                    |

\*The position of Legal Counsel is filled by outside consultants who serve in a staff capacity.

\*\*Consultants and new positions shall be included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the Code subject to the following limitation:

The Chairperson of the Agency's Board of Directors may determine in writing that a particular consultant or new persons, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements in this section. Such written determination shall include a description of the consultant's or new person's duties and, based upon that description, a statement of the extent of disclosure requirements. The Chairperson's determination is a public record and shall be retained for public inspection in the same manner and location as this conflict of interest code. (Gov. Code Section 81008)

### **PUBLIC OFFICIALS WHO MANAGE PUBLIC INVESTMENTS AND DIRECTORS AND EXECUTIVES FOR GROUNDWATER SUSTAINABILITY AGENCIES**

The following positions are NOT covered by the conflict-of-interest code because they are required to file under Government Code Section 87200 (public officials who manage public investments) and/or Government Code Section 87200.5 (members of the board of directors and the executive director of a groundwater sustainability agency). Those who file under Government Code Section 87200 and/or 87200.5 are required to file electronically with the Fair Political Practices Commission; therefore, these positions are listed for informational purposes only:

- Board of Directors and Alternates
- Program Manager

An individual holding one of the above-listed positions may contact the Fair Political Practices Commission for assistance or written advice regarding their filing obligation if they believe that their position has been categorized incorrectly. The Fair Political Practices Commission makes the final determination whether a position is covered by Section 87200 and/or section 87200.5.

## APPENDIX OF DISCLOSURE CATEGORIES

### Category I

Individuals holding designated positions must report: a) Interests in real property located within the jurisdiction as well as interests in real property within two miles of, the boundaries of the jurisdiction or of any land owned or used by the Authority; b) Investments, business positions in business entities, income, gifts, loans, and travel payments from persons or entities engaged in the business of acquisition or disposal of real property (e.g. real property developers and brokers). .

### Category 2

Individuals holding designated positions must report: Investments, business positions in business entities and income, including gifts, loans, and travel payments, from sources which provide facilities, services, supplies, or equipment of the type utilized by the Authority, including but not limited to the following:

- Motor vehicles and specialty vehicles and parts therefor
- Construction and building materials and equipment
- Office equipment and supplies
- Petroleum products
- Irrigation equipment and supplies
- Safety equipment and facilities
- Engineering services
- Water quality testing
- Real property or real estate development
- Farming
- Newspapers and other publications
- Printing or reproduction services
- Employment and temporary help agencies
- Soil tests, compaction and grading
- Banks and savings and loans
- Insurance companies
- Public utilities or private water companies
- Audit agreements and contracts
- Medical services
- Agricultural or similar chemicals

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- Office equipment and supplies
- Petroleum products
- Irrigation equipment and supplies
- Safety equipment and facilities
- Engineering services
- Water quality testing
- Real property or real estate development
- Farming
- Newspapers and other publications
- Printing or reproduction services
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