

**BOARD OF DIRECTORS
SANTA CLARA VALLEY WATER DISTRICT**

RESOLUTION NO. 2025-

**AMENDING THE SANTA CLARA VALLEY WATER DISTRICT
CONFLICT OF INTEREST CODE**

WHEREAS, under the Political Reform Act of 1974, the Santa Clara Valley Water District (Valley Water) is required to adopt a Conflict-of-Interest Code (Code) designating individuals subject to conflict-of-interest reporting requirements and to periodically review and update it as necessary, including but not limited to, a biennial review; and

WHEREAS, if a change is necessary, Valley Water is required to submit an amended Code to its code-reviewing body for approval; and

WHEREAS, the County of Santa Clara Board of Supervisors is the code-reviewing body for all local agencies whose jurisdiction is solely within the County, including Valley Water; and

WHEREAS, revisions to Valley Water's Code are appropriate or necessary to: (a) remove positions that are not involved in making or participating in making governmental decisions due to over-listing of positions in the prior Code and/or changes in positions or responsibilities; (b) add new positions to the Code which are involved in making or participation in making government decisions which may have a material financial effect on their financial interests; and (c) update disclosure categories.

NOW, THEREFORE BE IT RESOLVED that the Board of Directors of the Santa Clara Valley Water District does hereby declare that the attached Santa Clara Valley Water District Amended Conflict of Interest Code with exhibits (redlined version showing changes is attached hereto as Exhibit A; clean/final version is attached hereto as Exhibit B) is adopted effective October 14, 2025, and shall be submitted for approval by the County of Santa Clara Board of Supervisors, and upon such date of approval, shall become effective and in force for Valley Water.

PASSED AND ADOPTED by the Board of Directors of the Santa Clara Valley Water District by the following vote on October 14, 2025:

AYES: Directors

NOES: Directors

ABSENT: Directors

ABSTAIN: Directors

SANTA CLARA VALLEY WATER DISTRICT

TONY ESTREMER
Chair, Board of Directors

ATTEST: CANDICE KWOK-SMITH

Clerk, Board of Directors

EXHIBIT A COVERSHEET

SANTA CLARA VALLEY WATER DISTRICT [PROPOSED] AMENDED CONFLICT OF INTEREST CODE (REDLINED VERSION)

No. of Pages: 10

Exhibit Attachments: None

SANTA CLARA VALLEY WATER DISTRICT CONFLICT OF INTEREST CODE

SANTA CLARA VALLEY WATER DISTRICT

AMENDED

CONFLICT OF INTEREST CODE

Approval Date:

TBD - Revisions to the Code to be Passed by

Resolution of Board of Directors on October 14, 2025

and

Approved by Board of Supervisors on

Board of Supervisors
County of Santa Clara
70 West Hedding Street
San Jose, CA 95110

The Santa Clara Valley Water District hereby submits the appended Conflict of Interest Code for approval or other action pursuant to law. The Code is in standard form and Exhibit "A" has been modified to remove three classifications that no longer exist, add five new classifications, and updating nineteen classification titles.

~~Tony Estremera~~ ~~Nai Hsueh~~

Chair, Board of Directors

Received on behalf of the Board of Supervisors of the County of Santa Clara this _____,
day of _____, 2025.

~~Tiffany Lennear~~ ~~Curtis Boone~~

Clerk of the Board of Supervisors

The appended Conflict of Interest Code, having been submitted by Santa Clara Valley Water District, was approved by order of the Board of Supervisors on _____.

Other action (if any):

~~Curtis Boone~~ ~~Tiffany Lennear~~

Clerk of the Board of Supervisors

CONFLICT OF INTEREST CODE
FOR
SANTA CLARA VALLEY WATER DISTRICT

The Political Reform Act, Government Code Sections 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 Section 18730, which contains the terms of a standard Conflict of Interest Code, which can be incorporated by reference, and which may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act after public notice and hearings. Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission, along with the Exhibits "A", "B" and "C" in which officials and employees are designated and disclosure categories are set forth, are hereby incorporated by reference and constitute the Conflict of Interest Code of the Santa Clara Valley Water District. The complete text of 2 California Code of Regulations Section 18730 can be viewed on the Fair Political Practices Commission web page at: <http://www.fppc.ca.gov/content/dam/fppc/NS--Documents/LegalDiv/Regulations/Index/Chapter7-/Article2/18730.pdf> www.fppc.ca.gov.

Persons holding designated positions shall file Statements of Economic Interests with Valley Water's filing official. If statements are received in signed paper format, Valley Water's filing official shall make and retain a copy and forward the original statements to the filing officer, the County of Santa Clara Clerk of the Board of Supervisors. If Statements are electronically filed using the County of Santa Clara's Form 700 e-filing system, both Valley Water's filing official and the County of Santa Clara Clerk of the Board of Supervisors will receive access to the e-filed Statements simultaneously. Valley Water shall retain Statements of Economic Interests as public records available for public inspection and reproduction pursuant to Government Code section 81008.

EXHIBIT "A"

Designated Positions

I. Persons occupying the following positions are designated employees and must disclose financial interests defined in Category 1 of Exhibit B.

~~ASM – Capital Program Planning & Analysis Manager~~ (classification removed)

ASM - Civic Engagement Manager

ASM - Communications Manager

ASM - Construction Procurement & Contracts ManagerSupport (classification title updated)

~~ASM – Emergency & Security Manager~~ (classification title updated to SSM - Security Manager)

ASM - Environmental Health and Safety Manager

ASM - Purchasing & Contracts Manager

ASM - Real Estate Services Manager

ASM - Risk Manager

~~ASM – Watersheds Business Planning and Analysis Manager~~ (classification title updated to FSM – Watersheds Business Planning & Analysis)

Assistant Chief Executive Officer

Assistant District Counsel

Assistant Officer

~~Board Support Officer~~ (classification removed)

Chief Executive Officer

Chief Operating Officer

Chief of External Affairs

Chief of Staff

Clerk of the Board

Deputy Administrative Officer

Deputy Clerk of the Board

Deputy Operating Officer

District Counsel

EGM/EWRM - Asset Management Manager (classification title updated)

~~EGM – Capital Engineering Manager~~ (classification title updated to EWRM – Capital Engineering Manager)

EGM/EWRM - Community Projects Review Manager (classification title updated)

~~EGM – Construction Manager~~ (classification title updated to EWRM – Construction Manager)

EGM/EWRM - Hydrology, Hydraulics & Geomorphology Manager (classification title updated)

EGM/EWRM - Operations & Maintenance Engineering Support Manager (classification title updated)

EGM/EWRM - Water Policy & Planning Manager (classification title updated)

ESM - Environmental Mitigation & Monitoring Manager

~~ESM – Environmental Services Manager – Water Utility~~ (classification removed)

ESM - Environmental Services Manager – Watershed

ESSM – Construction Inspection Manager (classification added)

ESSM - Land Surveying & Mapping Manager

EWRM - Capital Engineering Manager (classification title updated from EGM – Capital Engineering Manager)

EWRM – Construction Manager (classification title updated from EGM – Construction Manager)

FSM - Accounting Manager
 FSM - Budget Manager
 FSM - Financial Planning & Revenue Manager
 FSM - Revenue Manager
 FSM - Treasury & Debt Manager
FSM - Watersheds Business Planning & Analysis Manager (classification title updated from ASM – Watersheds Business Planning & Analysis Manager)
 GSM - Facilities & Fleet Manager
 IWM - Imported Water Manager
Large Construction Manager (classification added)
 Senior Assistant District Counsel
 Senior Project Manager - Water Utility
 Senior Project Manager - Watersheds
SSM – Security Manager (classification title updated from ASM – Emergency & Security Manager)
 Supervising Land Surveyor
 Supervising Well Ordinance Compliance Inspector
 WRM/EWRM - Groundwater Management Manager (classification title updated)
 WUOM/EWRM - Utility Operations & Maintenance Manager (classification title updated)
 WUOM/EWRM - Water Treatment Manager (classification title updated)
 WSOMM - Integrated Vegetation Manager
 WSOMM - Watershed Field Operations Manager
 WUOMM - Well & Water Measurement Manager

II. Persons occupying the following positions are designated employees and must disclose financial interests defined in Category 2 of Exhibit B.

ASM - Employment Services Manager
 ASM - Labor Relations Manager
 ASM - Racial Equity Diversity & Inclusion Manager
 Assistant Procurement Specialist
Community Benefits Manager (classification added)
 Contracts Administrator I
 Contracts Administrator II
 Deferred Compensation Committee Alternate
 Deferred Compensation Committee Member
~~EGM – Dam Safety Program Manager~~ (classification title updated to EWRM – Dam Safety Program Manager)
 EGM/EWRM - Electrical & Control Systems Engineering Manager- (classification title updated)
EGM/EWRM – Engineering CADD Manager (classification added)
 EGM/EWRM - Utility Maintenance Engineering Manager (classification title updated)
EGM/EWRM – Water Supply Operations Manager -(classification title updated from WUOM – Water Supply Operations Manager)
EWRM – Dam Safety Program Manager (classification title updated from EGM)
FSM – Grants and Claims Manager -(classification added)
 Government Relations Advocate
 GSM - Business Support, -& Customer Service & Warehouse ~~support~~ Manager (classification title updated)
 GSM - Engineering Support Manager
 GSM - Records & Library Manager
 ISM - Information Technology Manager
 ISM - Information Technology Projects & Business Operations Manager

ISM - Systems Development & Support Manager
 Management Analyst I, Purchasing & Consultant Contracts Services
 Management Analyst II, Purchasing & Consultant Contracts Services
 Principal Construction Contracts Administrator
 Procurement Specialist
 Program Administrator, Purchasing & Consultant Contracts Services
 Senior Construction Contracts Administrator
 Senior Management Analyst, Purchasing & Consultant Contracts Services
 Senior Procurement Specialist
 Senior Procurement Technician
 Senior Project Manager - Administration
 WRM - Laboratory Services Manager
 WRM - Recycled & Purified Water Manager
 WRM - Water Supply Planning & Conservation Manager
 WRM/EWRM - Water Quality Manager (classification title updated)
~~WUOM - Water Supply Operations Manager~~ (classification title updated to EGM/EWRM
- Water Supply Operations Manager)
 WUOMM - Utility Maintenance Manager - Distribution
 WUOMM - Utility Maintenance Manager - Treatment

- III. Persons occupying the following positions are designated employees and must disclose financial interests defined in Category 3 of Exhibit B.

Associate Real Estate Agent
 Senior Real Estate Agent

- IV. Persons occupying the following positions are designated employees and must disclose financial interests defined in Category 4 of Exhibit B.

None

- V. Persons occupying the following positions are designated employees and must disclose financial interests defined in Category 5 of Exhibit B.

Consultant

- VI. Newly Created Positions

A newly created position that makes or participates in the making of decisions that may foreseeably have a material effect on any financial interest of the position- holder, and which specific position title is not yet listed in Valley Water's conflict of interest code is 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 Chief Executive Officer (or Chief Executive Officer's designee) may determine in writing that a particular newly created position, although a "designated position," is hired to perform a range of duties that are limited in scope and thus is not required to fully comply with the broadest disclosure requirements, but instead must comply with more tailored disclosure requirements specific to that newly created position. Such written determination shall include a description of the newly created position's duties ~~and, and~~ based upon that description, a statement of the extent of the disclosure requirements. The Chief Executive Officer's (or Chief Executive Officer's designee'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.)

As soon as Valley Water has a newly created position that must file statements of economic interests, Valley Water's filing official shall contact the County of Santa Clara Clerk of the Board of Supervisors Form 700 division to notify it of the new position title to be added in the County's electronic Form 700 record management system, known as eDisclosure. Upon this notification, the Clerk's office shall enter the actual position title of the newly created position into eDisclosure and Valley Water's filing official shall ensure that the name of any individual(s) holding the newly created position is entered under that position title in eDisclosure.

Additionally, within 90 days of the creation of a newly created position that must file statements of economic interests, Valley Water shall update this conflict of interest code to add the actual position title in its list of designated positions, and submit the amended conflict of interest code to the County of Santa Clara Office of the County Counsel for code-reviewing body approval by the County Board of Supervisors. (Gov. Code Sec. 87306.)

EXHIBIT “B”

Disclosure Categories

Category 1

Designated persons in this category must report all interests in real property located entirely or partly within the boundaries of Valley Water, or within two miles of Valley Water boundaries, or of any land owned or used by Valley Water, as well as investments, business positions and sources of income, including gifts, loans and travel payments.

Category 2

Designated persons in this category must report all investments, business positions and sources of income, including gifts, loans and travel payments from sources that provide leased facilities, goods, equipment, vehicles, machinery, or services, including training or consulting services, of the type utilized by Valley Water.

Category 3

Designated persons in this category must report all interests in real property located entirely or partly within the boundaries of Valley Water, or within two miles of Valley Water boundaries, or of any land owned or used by Valley Water, as well as investments in, business positions with, and income (including gifts, loans, and travel payments) from all sources that are engaged in any real estate activity including, but not limited to, real estate appraisal, development, construction, planning/architectural design, engineering, sales, brokerage, leasing, lending, insurance, rights of way, and/or studies; and/or property or facilities management/maintenance/custodial and utility services as used by Valley Water or provides capital for the purchase of property used or sold by Valley Water.

Category 4

Designated persons in this category must report all investments in, business positions with, and income (including gifts, loans, and travel payments, and income from a nonprofit organization) from sources of the type to receive grants or other monies from or through Valley Water.

Category 5

Consultants, as defined for purposes of the Political Reform Act, shall disclose pursuant to the broadest disclosure category in Valley Water’s conflict of interest code (Category 1) subject to the following limitation: The Chief Executive Officer (or Chief Executive Officer’s designee) may determine in writing that a particular consultant, although a “designated position,” is hired to perform a range of duties that are limited in scope and thus is not required to comply fully with the disclosure requirement of the broadest disclosure category, but instead must comply with more tailored disclosure requirements specific to that consultant. Such written determination shall include a description of the consultant’s duties and, based upon that description, a statement of the extent of disclosure requirements. The Chief Executive Officer’s (or Chief Executive Officer’s designee’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.

EXHIBIT "C"
GOVERNMENT CODE SECTION 87200 FILERS

Pursuant to Government Code section 87200, officials who manage public investments as defined by 2 California Code of Regulations section 18700.3(b) are subject to the disclosure and disqualification provisions set forth in the Political Reform Act (Government Code Title 9, Chapter 7, Article 2) and are required to file full Statements of Economic Interests.

Valley Water has determined that the holders of the positions listed below are officials who manage public investments. These positions are not subject to Valley Water's code but are listed here for informational purposes only.

- (1) Member, Board of Directors
- (2) Chief Financial Officer

Government Code section 87200 filers shall file Statements of Economic Interests with Valley Water's filing official. If statements are received in signed paper format, Valley Water's filing official shall make and retain a copy and forward the original statements to the filing officer, the County of Santa Clara Clerk of the Board of Supervisors. If Statements are electronically filed using the County of Santa Clara's Form 700 e-filing system, both Valley Water's filing official and the County of Santa Clara Clerk of the Board of Supervisors will receive access to the e-filed Statements simultaneously. Valley Water shall retain Statements of Economic Interests as public records available for public inspection and reproduction pursuant to Government Code section 81008.

EXHIBIT B COVERSHEET

SANTA CLARA VALLEY WATER DISTRICT [PROPOSED] AMENDED CONFLICT OF INTEREST CODE (CLEAN/FINAL)

No. of Pages: 9

Exhibit Attachments: None

SANTA CLARA VALLEY WATER DISTRICT CONFLICT OF INTEREST CODE

SANTA CLARA VALLEY WATER DISTRICT

AMENDED

CONFLICT OF INTEREST CODE

Approval Date:

TBD - Revisions to the Code to be Passed by
Resolution of Board of Directors on October 14, 2025

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Approved by Board of Supervisors on

Board of Supervisors
County of Santa Clara
70 West Hedding Street
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The Santa Clara Valley Water District hereby submits the appended Conflict of Interest Code for approval or other action pursuant to law. The Code is in standard form and Exhibit "A" has been modified to remove three classifications that no longer exist, add five new classifications, and updating nineteen classification titles.

Tony Estremera
Chair, Board of Directors

Received on behalf of the Board of Supervisors of the County of Santa Clara this _____,
day of _____, 2025.

Curtis Boone
Clerk of the Board of Supervisors

The appended Conflict of Interest Code, having been submitted by Santa Clara Valley Water District, was approved by order of the Board of Supervisors on _____
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Other action (if any):

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ASM - Environmental Health and Safety Manager
ASM - Purchasing & Contracts Manager
ASM - Real Estate Services Manager
ASM - Risk Manager
Assistant Chief Executive Officer
Assistant District Counsel
Assistant Officer
Chief Executive Officer
Chief Operating Officer
Chief of External Affairs
Chief of Staff
Clerk of the Board
Deputy Administrative Officer
Deputy Clerk of the Board
Deputy Operating Officer
District Counsel
EGM/EWRM - Asset Management Manager
EGM/EWRM - Community Projects Review Manager
EGM/EWRM - Hydrology, Hydraulics & Geomorphology Manager
EGM/EWRM - Operations & Maintenance Engineering Support Manager
EGM/EWRM - Water Policy & Planning Manager
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Large Construction Manager
Senior Assistant District Counsel
Senior Project Manager - Water Utility
Senior Project Manager - Watersheds
SSM – Security Manager

Supervising Land Surveyor
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Community Benefits Manager
Contracts Administrator I
Contracts Administrator II
Deferred Compensation Committee Alternate
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EGM/EWRM - Electrical & Control Systems Engineering Manager
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EGM/EWRM – Water Supply Operations Manager
EWRM – Dam Safety Program Manager
FSM – Grants and Claims Manager
Government Relations Advocate
GSM - Business Support, Customer Service & Warehouse Manager
GSM - Engineering Support Manager
GSM - Records & Library Manager
ISM - Information Technology Manager
ISM - Information Technology Projects & Business Operations Manager
ISM - Systems Development & Support Manager
Management Analyst I, Purchasing & Consultant Contracts Services
Management Analyst II, Purchasing & Consultant Contracts Services
Principal Construction Contracts Administrator
Procurement Specialist
Program Administrator, Purchasing & Consultant Contracts Services
Senior Construction Contracts Administrator
Senior Management Analyst, Purchasing & Consultant Contracts Services
Senior Procurement Specialist
Senior Procurement Technician
Senior Project Manager - Administration
WRM - Laboratory Services Manager
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Consultant

- VI. Newly Created Positions

A newly created position that makes or participates in the making of decisions that may foreseeably have a material effect on any financial interest of the position- holder, and which specific position title is not yet listed in Valley Water's conflict of interest code is 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 Chief Executive Officer (or Chief Executive Officer's designee) may determine in writing that a particular newly created position, although a "designated position," is hired to perform a range of duties that are limited in scope and thus is not required to fully comply with the broadest disclosure requirements, but instead must comply with more tailored disclosure requirements specific to that newly created position. Such written determination shall include a description of the newly created position's duties and based upon that description, a statement of the extent of the disclosure requirements. The Chief Executive Officer's (or Chief Executive Officer's designee'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.)

As soon as Valley Water has a newly created position that must file statements of economic interests, Valley Water's filing official shall contact the County of Santa Clara Clerk of the Board of Supervisors Form 700 division to notify it of the new position title to be added in the County's electronic Form 700 record management system, known as eDisclosure. Upon this notification, the Clerk's office shall enter the actual position title of the newly created position into eDisclosure and Valley Water's filing official shall ensure that the name of any individual(s) holding the newly created position is entered under that position title in eDisclosure.

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EXHIBIT “B”

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Category 4

Designated persons in this category must report all investments in, business positions with, and income (including gifts, loans, and travel payments, and income from a nonprofit organization) from sources of the type to receive grants or other monies from or through Valley Water.

Category 5

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