

NOTICE OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE
OF THE DUBLIN SAN RAMON SERVICES DISTRICT

NOTICE IS HEREBY GIVEN that the Dublin San Ramon Services District, pursuant to the authority vested in it by section 87306 of the Government Code, proposes amendment to its conflict of interest code. A comment period has been established commencing on July 15, 2026, and closing on August 28, 2026. All inquiries should be directed to the contact listed below.

The Dublin San Ramon Services District proposes to amend its conflict of interest code to include employee positions that involve the making or participation in the making of decisions that may foreseeably have a material effect on any financial interest, as set forth in subdivision (a) of section 87302 of the Government Code. The amendment carries out the purposes of the law and no other alternative would do so and be less burdensome to affected persons.

Changes to the conflict of interest code include: amendments to reflect organization changes made since last approval of the conflict of interest code in January 2023, removal of certain lower-level, non-supervisory positions not required to be designated, removal of department/division names, identification of additional positions that must file under section 87200 of the Government Code, and update of disclosure categories; and also makes other technical changes.

Information on the code amendment is available on the agency's website at www.dsrsd.com and attached to this notice, which shall be emailed to all agency employees.

Any interested person may submit written comments relating to the proposed amendment by submitting them no later than August 28, 2026, or at the conclusion of the public hearing, if requested, whichever comes later. At this time, no public hearing is scheduled. A person may request a hearing no later than August 13, 2026.

All inquiries concerning this proposed amendment and any communication required by this notice should be directed to: Nicole Genzale, Executive Services Supervisor/District Secretary, at (925) 875-2203 or genzale@dsrsd.com.

CONFLICT OF INTEREST CODE FOR THE
DUBLIN SAN RAMON SERVICES DISTRICT

The Political Reform Act (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 has adopted a regulation (2 California Code of Regulations Section 18730) ~~which 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 ~~it 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 Section 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 ~~officials and employees~~ positions and establishing disclosure categories, shall constitute the conflict of interest code of the **Dublin San Ramon Services District (District)**.

Commented [CF1]: Standard language applied

~~Officials who must file under Government Code Section 87200, must file their statements of economic interests electronically with the Fair Political Practices Commission, these positions are listed on page 6 for informational purposes only. All other individuals holding designated positions shall must file their statements of economic interests with the District, which will make the All statements must be made available for public inspection and reproduction under Government Code Section 81008. All statements will be retained by the District.~~

Commented [BC2]: There's a typo here

Commented [CF3]: New 87200 language applied to place of filing paragraph.

CONFLICT OF INTEREST CODE FOR THE
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APPENDIX A
DESIGNATED POSITIONS

Designated Positions	Disclosure Categories
Office of the General Manager	
General Manager	1-5
Assistant General Manager	1-5
Public Affairs Division	
Public Affairs Supervisor	1
Administrative Services Department	
Administrative Services Director	1-5
Executive Services Supervisor	1
Financial Services Manager	1-5
Human Resources and Risk Manager	1
Information Technology Analyst II	7
Information Technology Manager	8
Senior Human Resources Analyst	1
Senior Utility Billing and Customer Services Representative	1
Utility Billing and Customer Services Supervisor	1
Operations Department	
Operations Director	1-5
Environmental Compliance Inspector I/II (Pretreatment)	6
Environmental Health and Safety Program Administrator	1

Commented [D4]: This amendment reflects updates made since last approval of the Code in January 2023, including updates following the District's implementation of its 2022 and 2024 workforce studies and resulting organizational changes. These collective updates also reflect an expanded leadership structure realigning financial influencing and decision-making responsibilities, and remove certain lower-level positions not required to be designated.

Commented [DSRSD5]: Proposal to remove names of all departments and divisions.

Commented [CF6]: Position is now listed as 87200 filer.

Commented [CF7]: Position retitled to Assistant General Manager - Finance and Administration and is now listed as 87200 filer.

Commented [DSRSD8]: Proposal to remove all non-supervisory positions except those that are assigned to manage programs that would result in making or influencing governmental decisions.

Additional proposal to not add new filing positions since last update, to align with above proposal: Senior Information Technology Analyst, Senior Management Analyst, and Senior Quality Assurance Chemist.

Commented [CF9]: Non supervisory position removed.

Commented [DSRSD10]: Renumber if current category 7 can be removed with removal of associated position from the code.

Commented [CF11]: Non-supervisory position removed.

Commented [CF12]: Non supervisory position removed.

Commented [DSRSD13]: Position abolished and replaced by Finance Services Supervisor.

Commented [CF14]: Non supervisory position removed.

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APPENDIX A
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Designated Positions	Disclosure Categories
Instrumentation, Controls and Electrical Supervisor	6
Laboratory and Environmental Compliance Manager	6
Mechanic II	6
Mechanic II (Crane Certified)	6
Mechanical Superintendent	6
Mechanical Supervisor	6
Operations Compliance Manager	6
Pretreatment Programs Administrator	6
Principal Electrical Engineer	1-5
Senior Electrician	6
Senior Environmental Chemist	6
Senior Environmental Compliance Inspector	6
Senior Instrumentation and Controls Technician	6
Senior Mechanic	6
Senior Mechanic (Crane Certified)	6

Commented [D15]: This amendment reflects updates made since last approval of the Code in January 2023, including updates following the District's implementation of its 2022 and 2024 workforce studies and resulting organizational changes. These collective updates also reflect an expanded leadership structure realigning financial influencing and decision-making responsibilities, and remove certain lower-level positions not required to be designated.

Commented [CF16]: Non supervisory position removed.

Commented [CF17]: Non supervisory position removed.

Commented [CF18]: Non supervisory position removed.

Commented [CF19]: Non supervisory position removed.

Commented [CF20]: Non supervisory position removed.

Commented [CF21]: Non supervisory position removed.

Commented [CF22]: Non supervisory position removed.

Commented [CF23]: Non supervisory position removed.

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**APPENDIX A
DESIGNATED POSITIONS**

<u>Designated Positions</u>	<u>Disclosure Categories</u>
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Senior Process Wastewater Treatment Plant Operator	6
Wastewater Treatment Plant Operations Superintendent	6

Commented [CF24]: Non supervisory position removed.

Engineering and Technical Services Department

Engineering Services Director	1-5
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Associate Engineer	1-5
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Commented [CF25]: Non supervisory position removed.

Clean Water Programs Administrator	6
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Construction Inspector I/II	6
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Commented [CF26]: Non supervisory position removed.

Environmental Compliance Inspector I/II (Clean Water)	6
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Commented [CF27]: Non supervisory position removed.

Principal Engineer	1-5
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Commented [CF28]: Position retitled to Engineering Manager.

Principal Water/Wastewater Systems Engineer	1-5
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Commented [CF29]: Position abolished.

Senior Engineer	1-5
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Senior Water/Wastewater Systems Operator	6
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Commented [CF30]: Non supervisory position removed.

Water/Wastewater Systems Superintendent	6
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Water/Wastewater Systems Supervisor	6
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Consultants/New Positions	*
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<u>Designated Positions</u>	<u>Disclosure Categories</u>
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Administrative Services Director	1-5
<u>Asset Management Supervisor</u>	<u>1</u>
Clean Water Programs Administrator	6
<u>Deputy Director of Operations – Regulatory</u>	<u>1-5</u>
Engineering Manager	1-5
Engineering Services Director	1-5
Environmental Health and Safety Program Administrator	1
Executive Services Supervisor	1
<u>Finance Supervisor</u>	<u>1</u>
Financial Services Manager	1-5
Human Resources and Risk Manager	1
Information Technology Manager	7
Instrumentation, Controls and Electrical Supervisor	6
Laboratory and Environmental Compliance Manager	6
<u>Laboratory Supervisor</u>	<u>6</u>
Mechanical Superintendent	6
Mechanical Supervisor	6
Operations Compliance Manager	6
Operations Director	1-5
Pretreatment Programs Administrator	6
Principal Electrical Engineer	1-5
<u>Public Affairs Program Administrator</u>	<u>1</u>
Public Affairs Supervisor	1
Senior Engineer	1-5
<u>Special Assistant to the General Manager</u>	<u>1-5</u>
Wastewater Treatment Plant Operations Superintendent	6
<u>Wastewater Treatment Plant Supervisor</u>	<u>6</u>
Water/Wastewater Systems Superintendent	6
Water/Wastewater Systems Supervisor	6

Consultants/New Positions

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*Consultants/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 General Manager 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 thus is not required to comply fully with the disclosure requirements described in this section. Such written determination

Commented [CF31]: New position added.

Commented [CF32]: New position added.

Commented [BC32R2]: Was it confirmed if they make real property decisions?

Commented [CF32R3]: Email sent to agency contact requesting confirmation on real property decisions.

Commented [CF33]: Position retitled from Principal Engineer.

Commented [CF34]: New position added.

Commented [CF35]: New position added.

Commented [CF36]: New position added.

Commented [BC36R2]: Was it confirmed if they make real property decisions? They’re not in the org chart so I couldn’t tell how high-level they are.

Commented [CF37]: New position added.

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DESIGNATED POSITIONS

shall include a description of the consultant's or new position's duties and, based upon that description, a statement of the extent of disclosure requirements. The General Manager'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 Sec.~~Government Code Section 81008).

The following positions are NOT covered by the ~~conflict-of-interest~~ code because they must file under Government Code Section 87200. ~~and, Those who file under Government Code Section 87200 are required to file electronically with the Fair Political Practices Commission, therefore, these positions are listed for informational purposes only:~~

- Board of Directors
- ~~Administrative Services Director~~/Treasurer
- General Manager
- Assistant General Manager – Finance and Administration
- Finance Director
- ~~Consultants Who Manage Public Investments~~ Consulting 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 obligations if they believe that their position has been incorrectly categorized. The Fair Political Practices Commission makes the final determination whether a position is covered by Government Code Section 87200.

Commented [BC38]: In the approved code this is (Gov. Code Sec. 81008).

Commented [BC39]: This is hyphenated in the approved code

Commented [CF40]: New 87200 language applied.

Commented [CF41]: Title change, Administrative Services Director removed from title.

Commented [CF42]: Previously listed as a designated position.

Commented [CF43]: Previously listed as a designated position. Title change, Finance and Administration added to title.

Commented [CF44]: New position added to 87200 filers.

Commented [CF45]: New position added to 87200 filers.

Commented [BC45R2]: Should this title be more specific? I think I have had this conversation with Maria before where I was working on a code that wanted to use the same title but we had them specify the title of these consultants since this is too general. I know this general title comes from our Form 700 unit.

Commented [CF45R3]: Would Consulting Manager work? The agency contact sent me an update and noted that Cyndi in SEI suggested this title.

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APPENDIX B
DISCLOSURE CATEGORIES

Designated positions must disclose pursuant to the categories below.

1. Investments and business positions in business entities and sources of income, (including receipt of gifts, loans, and travel payments) ~~from sources that provide services, supplies, materials, machinery, or equipment if the business entity or source provides leased facilities, products, equipment, vehicles, machinery or services (including training or consulting services)~~ of the type utilized by the District.
- ~~2. Investments and business positions in business entities and sources of income, (including receipt of gifts, loans, and travel payments), from sources (including business entities, governmental entities, and non profits) for which the agency has oversight authority. Sources include those subject to the District's regulation, permits, fines or citations.~~
2. Investments and business positions in business entities and sources of income (including receipt of gifts, loans and travel payments) if the business entity or source is subject to the Agency's regulatory, permit or licensing authority.
3. Investments and business positions in business entities and sources of income, (including receipt of gifts, loans, and travel payments), ~~from sources that if the business entity or source engages~~ in the acquisition, appraisal, disposal, or development of real property within the District.
4. Investments and business positions in business entities and sources of income, (including receipt of gifts, loans, and travel payments), ~~from sources that if the business entity or source~~ regularly engage in the preparation of environmental impact statements or reports.
5. ~~Interests in real property located within the jurisdiction of the District or within two miles of the boundaries of the jurisdiction of the District, or within two miles of any land owned or used by the District. Interests in real property located within the jurisdiction of the District as well as real property within two miles of the real property owned or used by the District or the potential site.~~
6. Investments and business positions in business entities and sources of income, (including receipt of gifts, loans, and travel payments), ~~from sources that if the business entity or source provides leased facilities, products, equipment, vehicles, machinery or services (including training or consulting services) services, supplies, materials, machinery, or equipment~~ of the type utilized by the ~~designated~~ position's division.
7. ~~Investments and business positions in business entities and sources of income, including receipt of gifts, loans and travel payments, from information technology and telecommunications sources, including but not limited to, computer hardware or software companies, computer~~

Commented [BC46]: This is already in the approved code

Commented [CF47]: Standard language applied to disclosure categories.

Commented [BC48]: This needs to be fixed. It does not make sense.

Commented [CF48R2]: I added the standard language for Regulatory/Licenses/Permits. I will check with the agency contact if this language works.

Commented [CF49]: Updated language for real property disclosure.

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~~consultant services, training, and data processing firms of the type utilized by the designated position's division.~~

~~8.7. Investments and business positions in business entities and sources of income, (including receipt of gifts, loans, and travel payments), from if the business entity or source provides information technology and/or telecommunications goods, products or services sources, including but not limited to, computer hardware or software companies, computer consultant services, training, and data processing firms of the type utilized by the District. including computer hardware or software companies, computer consultant services, IT companies, data processing firms and media services.~~

Commented [DSRSD50]: Category assigned to the Information Technology Analyst II position proposed for removal.

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Officials who must file under Government Code Section 87200, must file their statements of economic interests electronically with the **Fair Political Practices Commission**, these positions are listed on page 6 for informational purposes only. All other individuals holding designated positions must file their statements with the **District**. All statements must be made available for public inspection and reproduction under Government Code Section 81008.

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DESIGNATED POSITIONS

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Asset Management Supervisor	1
Clean Water Programs Administrator	6
Deputy Director of Operations – Regulatory	1-5
Engineering Manager	1-5
Engineering Services Director	1-5
Environmental Health and Safety Program Administrator	1
Executive Services Supervisor	1
Finance Supervisor	1
Financial Services Manager	1-5
Human Resources and Risk Manager	1
Information Technology Manager	7
Instrumentation, Controls and Electrical Supervisor	6
Laboratory and Environmental Compliance Manager	6
Laboratory Supervisor	6
Mechanical Superintendent	6
Mechanical Supervisor	6
Operations Compliance Manager	6
Operations Director	1-5
Pretreatment Programs Administrator	6
Principal Electrical Engineer	1-5
Public Affairs Program Administrator	1
Public Affairs Supervisor	1
Senior Engineer	1-5
Special Assistant to the General Manager	1-5
Wastewater Treatment Plant Operations Superintendent	6
Wastewater Treatment Plant Supervisor	6
Water/Wastewater Systems Superintendent	6
Water/Wastewater Systems Supervisor	6
Consultants/New Positions	*

*Consultants/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:

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shall include a description of the consultant's or new position's duties and, based upon that description, a statement of the extent of disclosure requirements. The General Manager'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 (Government Code Section 81008).

The following positions are NOT covered by the conflict of interest code because they must file under Government Code Section 87200. Those who file under Government Code Section 87200 are required to file electronically with the Fair Political Practices Commission, therefore, these positions are listed for informational purposes only:

- Board of Directors
- Treasurer
- General Manager
- Assistant General Manager – Finance and Administration
- Finance Director
- Consulting 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 obligations if they believe that their position has been incorrectly categorized. The Fair Political Practices Commission makes the final determination whether a position is covered by Government Code Section 87200.

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**APPENDIX B
DISCLOSURE CATEGORIES**

Designated positions must disclose pursuant to the categories below.

1. Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) if the business entity or source provides leased facilities, products, equipment, vehicles, machinery or services (including training or consulting services) of the type utilized by the District.
2. Investments and business positions in business entities and sources of income (including receipt of gifts, loans and travel payments) if the business entity or source is subject to the Agency's regulatory, permit or licensing authority.
3. Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) if the business entity or source engages in the acquisition, appraisal, disposal, or development of real property within the District.
4. Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) if the business entity or source regularly engage in the preparation of environmental impact statements or reports.
5. Interests in real property located within the jurisdiction of the District as well as real property within two miles of the real property owned or used by the District or the potential site.
6. Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) if the business entity or source provides leased facilities, products, equipment, vehicles, machinery or services (including training or consulting services) of the type utilized by the position's division.
7. Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) if the business entity or source provides information technology or telecommunications goods, products or services including computer hardware or software companies, computer consultant services, IT companies, data processing firms and media services.