



RODEO-HERCULES FIRE PROTECTION DISTRICT
1680 REFUGIO VALLEY ROAD, HERCULES, CALIFORNIA 94547
(510) 799-4561 FAX: (510) 799-0395

July 26, 2021

VIA EMAIL ONLY

aburnside@fppc.ca.gov

Amber Rodriguez
Staff Services Analyst, Enforcement Division
Fair Political Practices Commission
1102 Q Street, Suite 3000
Sacramento, CA 95811

Re: FPPC Complaint No. COM-07012021-01642; Steve Hill

Dear Ms. Rodriguez:

The following is in response to your correspondence dated July 7, 2021, regarding the FPPC complaint referenced above.

As you state, it appears the complainant is alleging I have violated the Political Reform Act's conflict of interest provisions.

Pursuant to my request to the FPPC for advice in my capacity as a Director of the Rodeo-Hercules Fire Protection District ("District"), dated May 14, 2021 (FPPC File No. A-21-054), the FPPC stated that under the Political Reform Act (the "Act"), I have no disqualifying conflicts of interest under the Act regarding a potential consolidation between the District and the Contra Costa County Fire Protection District ("Con Fire").

If I have no disqualifying conflicts of interest, then it is my understanding that under the Political Reform Act I would not have to recuse myself from discussions regarding a potential consolidation of the District with Con Fire.

The May 14, 2021, FPPC advice letter further advised upon California Government Code Section 1090 in that because of my employment by Con Fire, under California Government Code Section 1091(b)(13), I may have a remote interest in any contract that is made between the District and Con Fire, and as such, I must recuse myself from participating in making or approving any contract-related decisions between the District and Con Fire.

I intend to follow the above advice. As of the date of this letter, in my capacity as a Director of the District I have not participated in the making of or the approving of any contract between the District and Con Fire, and I have not participated in or approved any contract related decisions regarding a consolidation between the District and Con Fire.

What is currently before the Board is a report the District paid AP Triton, an independent consultant, to produce studying and making recommendations to the Board regarding the feasibility of a consolidation between the District, Con Fire, and East Contra Costa County Fire Protection District.

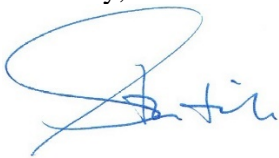
The study was requested as part of a strategic planning process undertaken by the Board designed to provide guidance to the Fire Chief and staff on long-term planning. It is an analysis generated by an entity independent of the District opining as to whether a consolidation would be financially and operationally feasible; it is not a contract, understanding, or agreement between the District and Con Fire to consolidate, annex, or merge the two districts. The District Board first received the report in mid-July and is currently reviewing it. The Board has commenced no discussions and made no decisions as to whether it will or will not consolidate, annex, or merge with Con Fire.

If a contract, understanding, or agreement to consolidate, annex, or merge with Con Fire were to be discussed by or brought before the Board for approval, then in accordance with the FPPC's advice letter, I would absolutely and unequivocally recuse myself from all such discussions, negotiations, and decisions regarding such a contract, understanding, or agreement. Moreover, I have personally made this position clear in numerous public meetings since receiving the above advice.

If my understanding of my obligations under the Act or Government Code Section 1090 are incorrect, please let me know and I will take steps to rectify such misunderstandings immediately.

Please contact me if you have any questions or require further information.

Sincerely,



Steve Hill
Chairperson
Rodeo-Hercules Fire Protection District Board of Directors

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