



COUNTY OF SAN DIEGO
DEPARTMENT OF
PUBLIC WORKS

Recusal & Conflict-of-Interest Policies and Procedures

Palomar Airport Advisory Committee

What We Will Cover

The Political Reform Act (PRA) and other laws that govern conflicts of interest for County committee members

Whether a PAAC member with a conflict must physically leave the room during discussion and vote

Option to establish a PAAC Rule requiring a conflicted member to leave the room in exceptional circumstances (e.g., 1090 conflict)

What Governs Recusal/Conflicts?



PAAC members are not considered public officials under the Political Reform Act (Gov. Code § 87100 et seq.). PAAC is an advisory body and was structured by County ordinance to allow members with financial interests (e.g., homeowners and business owners) to participate and provide recommendations.



PAAC members cannot have financial interest in contract for which they might provide recommendations. (Gov. Code § 1090). A member with such an interest may not participate in the recommendation process and must recuse themselves.



PAAC's Rules of Procedure (adopted Aug. 20, 2026) do not address conflict-of-interest recusal or room-departure. Regardless, any PAAC member that feels they may have a conflict is encouraged to bring this to the attention of Airports staff.

Who Must Leave the room?

Covered Officials

- Named in Gov. Code § 87105 — e.g., Board of Supervisors members
- Must physically exit during deliberation and vote on a conflicted matter

PAAC Members

- PAAC is an advisory body, not officials subject to Political Reform Act
- If a PAAC member has a financial interest in a contract, a recusal is required per Gov. Code § 1090
- Applicable law does not require a conflicted PAAC member to leave the room, but leaving is advisable to avoid a conflict in a contract
- PAAC's Rules and Regulations do not require a member to leave the room, but could be amended by PAAC to provide for removal; particularly, for an interest in a contract

The Option

A departure rule only applies if PAAC adopts one.



PAAC's adopted Rules of Procedure contain no room-departure provision. **If such a rule were to be adopted, a restriction limited to conflicts in a contract is consistent with the ordinance establishing PAAC**

Questions & Discussion
