

January 8, 2019


Chair Alice Germond and Commissioners  
Fair Political Practices Commission  
1102 Q Street, Suite 3000  
Sacramento, CA 95811

Re: Adoption of Amendments to Regulation 18702.2  
(Item 27 on Meeting Agenda for January 17, 2019)

Dear Chair Germond and Commissioners:

We would like to take this opportunity to thank the Fair Political Practices Commission, and Commission Counsel Brian Lau in particular, for considering concerns raised by the San Diego Ethics Commission regarding officials who are currently disqualified from general plan decisions on the basis of owning real property within the boundaries of the plan, even when the plan does not directly impact or implicate their properties. The amendments proposed for adoption include revisions that address and alleviate these concerns. We understand that the Commission has limited resources and that the primary focus of the review was to establish a bright-line materiality standard. Nevertheless, Mr. Lau and his colleagues made time to carefully consider the issues we raised and identify an effective solution. We sincerely appreciate the staff effort and encourage the Commission to adopt the proposal.

Sincerely,



Stacey Fulhorst  
Executive Director



Stephen Ross  
Education Program Manager