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September 12, 2025

Ed Harrington, Chair
Commission Streamlining Task Force
c/o City Administrator's Office
City Hall, Room 316
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4694

"The SDOB's \$1.3 million cost represents just eight-one-thousandths of one percent, (0.008176%) — of the City's \$15.9 billion budget; \$817,727 of which *won't be saved*."

Re: **September 3 Recommendations on Public Safety Bodies: Sheriff's Department Oversight Board**

Dear Mr. Harrington and Commission Streamlining Task Force Members,

Version 2 of the City Administrator's "*Recommended Actions for Public Safety Bodies*" memo revised as of August 29 states on page 6 that the staff recommendation is: "***Consider combining or eliminating***" the "Sheriff's Department Oversight Board," based on the newly-developed "*Evaluation Criteria*" document.

This recommendation is wrong, and the Sheriff's Oversight Board should — and must be — retained!

Cost of Body

Because the Budget and Legislative Analyst's (BLA) ***objective criteria*** analysis of the costs of each Board, Commission or Advisory Bodies had not been released as of August 29, the City Administrator's staff and this Streamlining Task Force had no idea of what it costs to have the Sheriff's Oversight Board. The BLA's analysis was subsequently released on September 2.

The BLA costs report claimed the SDOB costs just \$1.3 million — a mere 4% of the total \$33.9 million in costs for all 112 Boards and Commissions. More importantly, the SDOB cost of \$1.3 million represents just eight-one-thousandths of one percent, (0.008176%) — of the City's now \$15.9 billion annual budget. Yes, just eight-one-thousandths of one percent! It's a ridiculously small price to pay to provide oversight of the Sheriff's jails and other oversight functions.

Fully \$817,727 of the \$1.3 million in costs involved part-time "*soft costs*" that will **not** be saved, because those part-time staff perform other duties, and their positions won't be eliminated.

Sadly, ***the BLA is not performing a cost-benefit analysis*** analyzing the impact of eliminating the benefits any Board or Commission delivers for San Franciscans, so as Doug Engmann noted in testimony to this Task Force on April 2, the BLA work plan fails to assess the financial impact of eliminating or combining a body that brings benefits to our City.

"The '*Evaluation Criteria*' specifically stated the '*Sheriff's Oversight Board*' can *not*** reasonably be combined with another body (see Criteria 4-B)."**

"*Prop. E*" did not authorize this Streamlining Task Force to operate as a Donald Trump- or MAGA-style "DOGE" entity! That exceeds this Task Force's mandate, and is completely outside of the Task Force's purview.

Evaluation Criteria

Because the "*Evaluation Criteria*" section on page 41 of the "*Public Safety Recommendation*" memo regarding "*overlap with other bodies*" for the Sheriff's Oversight Board answered:

- "No" for whether other policy bodies cover a similar topic or policy area that the Sheriff's Oversight Board covers,
- "No" to whether the "Sheriff's Oversight Board" could reasonably be combined with another body in the "Public Safety" policy area category, and

- “No” to whether the Sheriff's Oversight Board take on the work of *other* bodies,

it's inconceivable that in the Evaluation Criteria's “*Breadth of Focus*” section the City Administrator's Staff then leapt to the conclusion that the Sheriff's Oversight Board is only focused on a narrow topic area or a single demographic group, so therefore, some other policy body or City Department could adequately represent the interests of the Sheriff's Department. City Administrator staff recommended on page 42 of the “*Public Safety Bodies Recommendation*” memo either eliminating the Sheriff's Oversight Board, or **combining** the Sheriff's Oversight Board with the “*Department of Police Accountability*” (DPA), which is a City Department separate from the San Francisco Police Department and Police Commission.

How can it be argued that both the Fire Commission and Police Commission do not have a narrow topic area or single demographic group (police officers and firefighters, respectively), but the SDOB is focused on a narrow demographic group (Sheriff's Deputies)?

Just as with the City Administrator's staff recommendation that it is not practical to combine either the Police Commission or the Fire Commission with another of the City's public bodies because there are no other bodies with overlapping functions, the same logic should be applied to the Sheriff's Department Oversight Board.

City Administrator staff suggested that either the Police Commission, or the Department of Police Accountability, could take on the work of **disciplinary** matters for the Sheriff's Department, but failed to identify any other body that could take on the SFOB's other **non-disciplinary duties**.

But of note, the City Administrator's staff recommendation for the Police Commission noted in the “*Evaluation Criteria*” section “*Overlap with Other Bodies*,” that the Police Commission can not reasonably take on the work of other Public Safety bodies. There is no evaluation criteria or assessment of whether the DPA — as a **Department** separate from the Police Department — can reasonably take on, or have the bandwidth to assume, additional work performed by the Sheriff's Oversight Board.

This Streamlining Task Force can't have it both ways — claiming first that the SDOB can not be combined with another body (in “*Evaluation Criteria*” Item 4-B), conclude similarly in “*Evaluation Criteria*” that the Police Commission also can not take on the work of other public safety bodies, and then conclude the SDOB can be combined with the DPA.

Of note, City Administrator's staff and the Commission Streamlining Task Force have categorized the Sheriff's Department Oversight Board as being a board or commission with **regulatory duties**, and regulatory oversight. As such, the SDOB should be neither eliminated, nor combined with another body, precisely because that could conceivably significantly impair regulatory oversight of the Sheriff's Department.

SDOB Responses to the Streamlining Task Force's Questionnaire

I placed a public records request for, and obtained from the City Administrator's Staff, the six-page Sheriff's Oversight Board's response to the Task Force's “*Commission and Other Public Bodies Questionnaire*” that asked 17 questions of each Commission, policy, and advisory body. Seventy-three (73) bodies returned their responses to the questionnaire, including the SDOB, Police Commission, and Fire Commission.

Has this Streamlining Task Force even bothered reading the SDOB's response to the questionnaire? If not, in response to question #15, “*Are there other public bodies performing similar functions or working on similar issues as this commission?*,” the Sheriff's Oversight Board essentially answered by saying “**No**,” and noted that adding oversight responsibilities over the Sheriff's Department would adversely affect the Police Commission's abilities and bandwidth.

The SDOB's response to the questionnaire noted there are no other public bodies focused on broader oversight of the Sheriff's Department and no other bodies perform that function. The SDOB concluded saying in its questionnaire response that combining the SDOB with another body “*would be ineffective*.”

The SDOB's questionnaire response provided a detailed list of 9 topic areas addressed during SDOB meetings, including Sheriff Department budget submissions, complaints and investigations findings, jail inspections, staff shortages, Inspector General monthly report updates, and other topics. In addition, SDOB provided a list of 11 types of decisions, several types of policies, and initiatives reviewed or initiated in the past year collaboratively with the "*Office of Sheriff's Inspector General*" (OSIG).

The Sheriff's Oversight Board does not deal **only** with disciplinary matters for Sheriff's Department employees. The SDOB's charge is far broader than just disciplinary issues. This Streamlining Task Force can't just transfer Sheriff's Department disciplinary matters to the DPA, and **not** assign the SDOB's remaining oversight duties to **nobody**! In answer to Question 14 on the Task Force's Questionnaire, the SDOB answered that if there is overlap of processes between bodies that might involve the SDOB, the SDOB noted while there *might be* some overlap with bodies "**like**" the Police Commission "(...) **it is important to recognize that these overlaps do not justify merging fundamentally different departments** [Sheriff's Department and Police Department] **under a single oversight body** [under the DPA]."

The SDOB also noted that trying to fold the SDOB under the same oversight as the Police Department — the DPA — ignores the critical distinction of the roles of the Police Department vs. the Sheriff's Department. The SDOB questionnaire response further noted that the Sheriff's Office **needs its own independent oversight body**, and that oversight of the unique complexities of jail operations, inmate care, and courthouse security would risk weakening accountability by combining oversight functions with either the Police Commission or DPA, potentially doing a disservice to public safety, and public safety accountability. The SDOB noted each department's work demands separate, specialized attention and oversight, and "**merging them under the same commission makes no practical sense.**"

Because adding oversight responsibilities for another large but different department — the Sheriff's Department — will adversely affect the DPA's ability to devote enough oversight attention to either department or the community, it should **not** be done! The SDOB concluded by observing that while there *might be* other public bodies focused on oversight in general, none are performing the same functions or addressing the same issues as the Sheriff's Oversight Board, so combining or comparing them would be ineffective.

For no other reason, the Streamlining Task Force should **not** weaken transparency and diminish oversight by simply eliminating the SDOB!

Appointing Authority and Budget Oversight

Currently, the Board of Supervisors appoints four of the seven seats on the Sheriff's Oversight Board (with one seat required to be held by an appointee with experience in labor representation), and the Mayor appoints three seats.

As the San Francisco Bar Association rightly noted:

*"Independent governance of commissions requires that its members [be] independent. The selection of Commissioners should rest with an informed and transparent nomination process. **No single branch of government should name all Commissioners.**"*

All along, the Commission Streamlining Task Force has completely ignored the fact that truly effective "*Governance Bodies*" must, therefore, be independent and have split appointments across branches of government.

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"The SDOB's response to this Task Force's questionnaire noted there are no other public bodies focused on broader oversight of the Sheriff's Department and no other bodies perform that function."

The SDOB does not deal **only with disciplinary matters for Sheriff's Department employees."**

To hand sole (all) commissioner appointments on any given Board or Commission only to the Mayor in the Executive Branch essentially renders that Mayor the “King”! Donald Trump might be envious!

The SDOB appoints and may remove the Sheriff's Inspector General. The duty of hiring the Sheriff's Inspector General should not be handed to the Mayor only, and relegate the SDOB to only having “*consultative responsibilities*” in the hiring of the Inspector General.

As well, in addition to reviewing the Sheriff's Department annual budget, the SDOB also reviews and approves the contract for hiring of the Sheriff's Inspector General. That task should also not be handed to the Mayor or to the DPA, else it will become politicized!

Annual Reports

City Charter §4.103, titled “*Boards and Commissions – Annual Report*,” states it requires each body to issue an annual report — separate and distinct from a City Department's annual report — that requires describing activities the governance body conducted during the year and recommendations it has made, to be filed with the Mayor and the Clerk of the Board of Supervisors. These Annual Reports are different from “*Annual Reports*” from City Departments.

The Sheriff's Department Oversight Board — like a handful of other Boards and Commissions, such as the Behavioral Health Commission — has commendably issued annual reports on its activities as a regulatory body describing actions it actually accomplishes.

As such, the SDOB deserves to be retained as it currently is structured, because it is consistently transparent about its activities separate and distinct from the annual accomplishments of the Sheriff's Department itself.

Voter-Approved

Voters approved creating the Sheriff's Department Oversight Board and the Sheriff's Office of Inspector General (SOIG) overwhelmingly in November 2020 by 67% of the votes cast. To the extent that the Streamlining Task Force votes to eliminate this voter-approved Regulatory Body, the five-member Streamlining Task Force will be substituting its own judgement and nullifying the voice of 276,685 San Franciscans who voted in 2020 to establish these two bodies.

Eliminating the SDOB and OSIG could roll back the clock to San Francisco having to settle lawsuits against the City due to a lack of independent external oversight. The costs of those lawsuits should have been weighed and estimated by the Budget and Legislative Analyst's (BLA) as costs that might accrue if the SDOB body is eliminated, or combined.

San Francisco Bar Association's Objections

The San Francisco Bar Association's (SFBA) testimony opposing changes to the Juvenile Probation Commission apply equally as well to the Streamlining Task Force's recommendation to eliminate or combine the Sheriff's Department Oversight Board. The Bar Association rightly notes that equally concerning are some of the Commission Streamlining Task Force's recommendations that appear to mirror, mimic, or include much of the recommendations in the “*Prop. D*” ballot measure (that was defeated in November 2024) had attempted to do.

The SFBA noted: “*Quite simply, independent commissions are an important way for the public to weigh in on critical policy-making decisions,*” because Commissions are critical to development of sound departmental policies.

“ The SDOB has commendably issued annual reports on its activities as a regulatory body describing actions it actually accomplishes.

As such, the SDOB deserves to be retained as it currently is structured.”

“ Task Force Chair Harrington cautioned Task Force members against ‘dramatically altering the City’s commission structure, and against radically overhauling public governance. Eliminating the SDOB would be an act of dramatically and radically harming public governance.’ ”

September 12, 2025

Recommendations on Public Safety Bodies: Sheriff's Department Oversight Board

Page 5

Streamlining Task Force Is Exceeding Its Mandate

The City Administrator's staff apparently proposed to this Streamlining Task Force combining the SDOB's "*disciplinary duties*" off to the DPA under the Police Commission — ostensibly as part of a broader effort to change employee disciplinary processes for citywide "*consistency*," claiming that may be inconsistent with other Boards and Commissions.

City Administrator staff and this Streamlining Task Force seem to ignore that peace officers, firefighters, and Sheriff's deputies are highly specialized jobs, and deserve unique disciplinary procedures. Unlike other City employees, California has a Public Safety Officers Procedural Bill of Rights Act (POBR) codified in Government Code § 3300, et seq. As well, Sheriff's Deputies, like police officers, are covered by the Commission on Peace Officer Standards and Training (POST).

This Task Force has raised a "*red herring*" and logical fallacy that disciplinary actions must be uniformly "*consistent*" across all City Departments, despite the unique roles and duties of peace officers.

"This Commission Streamlining Task Force should vote instead to retain the SDOB as it is currently structured."

It is beyond the scope of this Task Force's mandate to streamline or standardize employee discipline — since not even the Board of Supervisors are permitted to interfere with Departmental operations, including discipline of City employees. Streamlining Task Force Chair Harrington cautioned Task Force members against "*dramatically altering the City's commission structure, and against radically overhauling public governance.*"

As such, the SDOB deserves to be retained as it currently is structured. Eliminating the Sheriff's Department Oversight Body would be an act of dramatically altering the City's commissions structure and radically harming public governance.

For all the reasons stated above, this Commission Streamlining Task Force should reject the City Administrator's staff recommendation, and **vote instead to retain the Sheriff's Department Oversight Body as it is currently structured.**

Sincerely,

/s/

Patrick Monette-Shaw

cc: Rachel Alonso, Project Director, City Administrator's Office