

January 20, 2026

Commission Streamlining Task Force
1 Dr. Carlton B. Goodlett Place
Room 263
San Francisco, CA 94102



Re: Agenda Item #4: Proposed Amendments to Ethics Commission Ballot Authority — OPPOSE UNLESS AMENDED

Dear Members of the Commission Streamlining Task Force,

California Common Cause **strongly opposes** the proposed changes to the San Francisco Ethics Commission's ballot placement authority set forth in Agenda Item #4.

Transferring final amendment authority over Ethics Commission-sponsored ballot measures from the Ethics Commission to the Board of Supervisors (BOS) would fundamentally undermine the purpose of that authority. San Franciscans—not elected officials—created Ethics Commission ballot placement authority precisely to serve as a structural check on politicians who cannot credibly be expected to regulate themselves. Allowing the BOS final control over measures designed to hold the BOS accountable would defeat the law's intent, invite political interference, and predictably result in diluted or symbolic reforms that erode public trust rather than strengthen accountability.

Such a change would also materially weaken the Ethics Commission's independence by inserting politics directly into one of the Commission's core oversight functions. Ethics oversight is effective only when it is insulated from the very officials it regulates.

That said, there *is* a reasonable way to increase Board engagement without undermining the law's purpose. California Common Cause supports a compromise under which the BOS is granted a public hearing on an Ethics Commission-proposed ballot measure, with the opportunity to propose amendments by majority vote—but without final authority to amend or place the measure on the ballot. This approach meaningfully increases dialogue while preserving the Ethics Commission's independence and the accountability function voters intended.

Accordingly, we **support** the Ethics Commission's counterproposal to allow BOS hearings and amendment proposals while retaining final amendment and ballot placement authority with the Ethics Commission. While we disagree that a *unanimous* Ethics Commission vote—rather than a 4/5 vote—should be required to override BOS amendments (particularly given that the BOS itself is not subject to a unanimity standard), we nonetheless believe this framework is preferable to eliminating Commission amendment authority altogether.

However, if the Task Force proceeds with imposing a unanimity requirement on the Ethics Commission, we **strongly recommend** pairing that change with a clear prohibition on BOS-Ethics Commission *ex parte* communications—other than through public meetings and public comment—once the ballot measure process has formally begun. Such a safeguard is necessary to prevent undue political influence over commissioners during a heightened-stakes decision-making period.

In closing, allowing the Ethics Commission discretion to place ethics, accountability, and campaign-finance ordinances on the ballot is among the most important safeguards protecting both the Commission's independence and meaningful accountability in San Francisco government. Ethics oversight is one of the few areas in which elected officials should *not* have the final word. Independent oversight is essential to maintaining public confidence and ensuring accountability laws are strengthened when needed, rather than weakened or deferred.

For these reasons, California Common Cause strongly opposes the Task Force's proposed amendments in Agenda Item #4 and urges adoption of the Ethics Commission's counter-proposal—with the qualifications noted above. Doing so would preserve the intent of voter-approved law and reinforce public trust in San Francisco government.

Sincerely,
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