

Member, Board of Supervisors
District 10



City and County of San Francisco

SHAMANN WALTON

華頌善

August 20, 2026

John Arntz, Director
San Francisco Department of Elections
City Hall, Room 48
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

RE: False and Misleading Statement in the Rebuttal Argument in Favor of Proposition D

Dear Director Arntz:

False and misleading statements in the San Francisco Voter Information Pamphlet are dangerous and illegal. San Francisco Municipal Elections Code §590 allows for a public examination and review period to ensure such false statements are eliminated.

The rebuttal argument in favor of Proposition D submitted for publication in the Voter Information Pamphlet for the November 3, 2026 election, signed by Mayor Daniel Lurie, Board of Supervisors President Rafael Mandelman, and former Controller Ben Rosenfield, contains a blatantly false statement that we ask you to eliminate.

The last paragraph of the rebuttal argument states:

“Opponents claim today's rules date to 1932. The Controller's report confirms the current threshold was set in 2022, requiring approximately 9,000 fewer signatures than before. San Francisco will still have one of the lowest signature thresholds in California, including other large cities like Oakland, San Diego. and Long Beach.”

This statement is false and misleading in two independent respects.

1. The Controller's Report Does Not “Confirm” This Claim

The Proponents attribute this claim to “the Controller's report” — an apparent reference to Controller Greg Wagner's statement on Proposition D, dated August 10, 2026, prepared for inclusion in this same Voter Information Pamphlet. That letter makes no mention whatsoever of the year 2022, of any prior signature threshold, or of any historical change in the number of signatures required. It addresses only the current 2% threshold (approximately 10,600 signatures) and the proposed 8% threshold (approximately 42,500 signatures) under Proposition D. The Controller's report simply does not say what the Proponents claim it says. Attributing a specific historical and numerical claim to a public official's report that contains no such statement misleads voters into believing the claim carries the Controller's independent authority, when it does not.

2. The Claim of “Approximately 9,000 Fewer Signatures” Is Contradicted by the City’s Own Records

The Proponents’ statement implies that the current signature threshold reflects an actual reduction of approximately 9,000 signatures from a real prior requirement. The City’s own official records establish that no such reduction has ever occurred. To the contrary, the documented signature requirement for citizen initiatives has only risen over the relevant period:

Election Cycle	Signatures Required	Basis	Source
March 2020 (Prop. E)	9,485	5% of votes cast for Mayor, 2015	March 2020 SF Voter Information Pamphlet, p. 55
November 2024 (Prop. M)	10,029	2% of registered voters	November 2024 SF Voter Information Pamphlet, p. 187
July 23, 2026 (certification)	10,615	2% of registered voters, SF Charter §14.101	SF Department of Elections certification letter, John Arntz, Director

While the formula for determining the exact number of signatures required was changed by voters thought the passage of Prop H in November, 2022, it absolutely did not “require approximately 9,000 fewer signatures” as claimed by the rebuttal authors. In fact, the signature threshold has increased, from 9,485 signatures in March, 2020 to 10,615 signatures for the current election.

Requested Relief

We request that the Director of the San Francisco Department Elections strike the entire last paragraph from the Prop D rebuttal on the grounds that it is false and misleading and that such correction will not substantially interfere with the printing or distribution of the Pamphlet.

Given the time-sensitive nature of the public examination period, we respectfully request the Department’s prompt attention to this matter. Please contact the undersigned with any questions.

Signed,



Supervisor Shamann Walton
San Francisco Board of Supervisors, District 10

Exhibits

- A — Rebuttal Argument in Favor of Proposition D, as submitted
- B — Controller’s Statement on Proposition D, dated August 10, 2026
- C — November 2024 San Francisco Voter Information Pamphlet, p. 187
- D — March 2020 San Francisco Voter Information Pamphlet, p. 55
- E — San Francisco Department of Elections certification letter, July 23, 2026

Section 4: Information for Paid Arguments

Paid arguments must include information about the true source of funds for the publication of the argument. It is also required to indicate whether the true source of funds is a recipient committee. This information will be printed below the argument and the author information in the Voter Information Pamphlet.

The true source of funds for the printing fee of this argument:

Is the true source of funds a recipient committee, as defined by CA Gov. Code §82013?

Yes ☐ No ☐

If the true source(s) of funds is a recipient committee, list the three largest contributors below:

1.
2.
3.

Section 5: Argument Text

The text of your argument will be printed exactly as submitted. Ensure that your argument meets the legal word limit. You may request that specific argument text be printed in bold, italic, or bold italic type. Type your argument with the desired formatting, or underline the argument text to be formatted and in the left column, mark "B" for bold, "I" for italics, or "BI" for bold italics. Other special formatting is not permitted. **Include author information in argument text.**

Format B, I, BI	Keep Text Within the Vertical Lines	# of words per line
	D ENDS THE INSIDER MONOPOLY ON POWER AT THE BALLOT The insiders are misleading voters because their monopoly on power is being challenged. They think the system works great. San Franciscans know the system is broken: keeping us in a constant state of confusion, dividing neighbors, and producing bad outcomes. D is a set of modest reforms requiring transparency, compromise, and community input before issues get on the ballot so that voters can weigh in on well thought-out measures. None of these reforms add a financial cost. D REBALANCES POWER TO VOTERS Currently a minority of supervisors, just 2% of voters, or the mayor acting alone can throw anything on the ballot without public input, transparency, or proven community support. Political insiders exploit these rules regularly. That is why San Francisco has the longest and most confusing ballots in the state. D REQUIRES TRANSPARENCY, COMPROMISE AND COMMUNITY INPUT. D, placing a measure on the ballot requires a public vote of a majority of the Supervisors or a modest amount of signatures. D also removes the mayor's sole authority to place measures on the ballot, ensuring a fair balance of power. Opponents claim today's rules date to 1932. The Controller's report confirms the current threshold was set in 2022, requiring approximately 9,000 fewer signatures than before. San Francisco will still have one of the lowest signature thresholds in California, including other large cities like Oakland, San Diego, and Long Beach. Mayor Daniel Lurie Board of Supervisors President Rafael Mandelman Former Controller Ben Rosenfield	
If handwritten information or a revision is unclear, Department staff will interpret the handwritten information to the best of their abilities; this interpretation is final.		
Total Word Count		

Office Use Only				
Total # of words=	X \$2/word =	+ \$200 publication fee =		Staff Initials
# of signatures submitted in lieu of publication fee		Receipt #		
X \$0.50/signature		Check #		
Adjusted Fee Total		Amount Paid		



OFFICE OF THE CONTROLLER

CITY AND COUNTY OF SAN FRANCISCO

Greg Wagner
Controller

ChiaYu Ma
Deputy Controller

Mr. John Arntz
Department of Elections
City Hall 1 Dr. Carlton B. Goodlett Place Room 48
San Francisco, CA 94102-4689

August 10, 2026

RE: Proposition D – Changes to Ballot Measure Process

Dear Mr. Arntz,

Should the proposed Charter amendment be approved by the voters, in my opinion, it would have a minimal impact on the cost of government.

The proposed Charter amendment would (1) require the approval of a majority of the Board of Supervisors to place an ordinance on the ballot, (2) eliminate the Mayor's ability to directly place an ordinance on the ballot, (3) increase the voter signature threshold for initiatives from 2% to 8% (currently from about 10,600 to about 42,500 signatures) of the registered voters in San Francisco, (4) allow proponents to withdraw a measure after it qualifies for the ballot, and (5) raise the threshold for special elections from 10% of the votes for mayor in the last general municipal election to 10% of registered voters.

The proposed amendment is likely to reduce costs at levels that cannot be determined at this time. Since the proposed Charter amendment raises the voter signature threshold, fewer initiatives may qualify for the ballot which may reduce the volume of printed pages included in the voter information pamphlet (VIP). On average, each page in the VIP costs \$11,400 to prepare, print, and distribute to all registered voters. The proposed increase in the voter signature threshold may also reduce the number of special elections called which would result in cost savings for the Department of Elections. The estimated minimum cost for a citywide special election is \$5 million with a one-card ballot and less than 50-page VIP.

The proposed Charter amendment may impact the Department of Election's workload. It may result in a reduction in ballot ordinances which would reduce the associated workload for the Department of Elections—freeing staff to work on other government functions. Conversely, the Department of Elections may see an increase in workload to validate more voter signatures for a measure to qualify for the ballot and to remove qualified measures at the proponents' request.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Wagner".

Greg Wagner
Controller

Note: This analysis reflects our understanding of the proposal as of the date shown. At times further information is provided to us which may result in revisions being made to this analysis before the final Controller's statement appears in the Voter Information Pamphlet.

The homelessness gross receipts tax would continue to fund homelessness prevention and services for people experiencing homelessness.

The City would use the other taxes mentioned above for general government purposes.

All these taxes would apply indefinitely until repealed.

This proposal would increase the City's spending limit for four years.

If Proposition M passes with more votes than Proposition L, then Proposition L would have no legal effect.

A "YES" Vote Means: If you vote "yes," you want to change the following taxes the City collects from businesses: the gross receipts tax, the homelessness gross receipts tax, the overpaid executive gross receipts tax, the administrative office tax and business registration fees.

A "NO" Vote Means: If you vote "no," you do not want to change the City's business taxes.

Controller's Statement on "M"

City Controller Greg Wagner has issued the following statement on the fiscal impact of Proposition M:

Should the proposed ordinance be approved by the voters, in my opinion, it would have the following effects on business tax revenue. Over the first three fiscal years, between fiscal year 2024–25 and FY 2026–27, the measure is projected to reduce revenues by approximately \$40 million annually. While uncertain this projected loss may be smaller if the measure helps enable the City to reduce reserves for disputed taxes in the future. Beginning in 2027, scheduled rate increases would generate positive revenues of approximately \$50 million annually in FY 2028–29 and thereafter. By FY 2029–30, the total positive revenue resulting from the rate increases would offset the reduced revenue in the first three years, making the total amount of business tax revenue over that period comparable to current law. After FY 2029–30, the ordinance is projected to continue to generate additional revenue of approximately \$50 million annually. Projected revenue impacts above assume a reduction in business license fees of \$10 million annually, which will be proposed in forthcoming legislation.

The proposed ordinance would amend the City's existing Business and Tax Regulations Code in several key areas:

- Increases the small business exemption from the gross receipts tax from \$2.25 million to \$5.0 million,
- Consolidates the number of tax schedules from 14 business activity categories to 7 business activity categories for the gross receipts and homelessness gross receipts taxes,
- Adjusts tax rates for gross receipts, homelessness gross receipts, administrative office, and overpaid executive gross receipts taxes in 2025, and increases tax rates on gross receipts, administrative office, and overpaid executive gross receipts taxes in 2027 and 2028; currently scheduled tax rate increases after 2024 would not occur under this proposal,
- Shifts the City's calculation of San Francisco gross receipts for most business activities away from payroll expenses and towards sales; the only exceptions are business activities whose San Francisco gross receipts calculation is already entirely based on sales,
- Requires the Office of the Treasurer and Tax Collector to establish an advance determination process to provide written guidance to taxpayers, and makes other implementation changes,
- Creates new tax credits for businesses paying stadium operator admission taxes, grocery retailers, and new lessees in certain newly constructed buildings,
- Makes changes to business registration fees.

Additionally, the ordinance requires that the Controller report on the impact of the various changes made by this initiative in September 2026 and September 2027.

Business taxes can vary significantly depending on economic conditions, and current estimates may not be predictive of future revenues.

How "M" Got on the Ballot

On July 8, 2024, the Department of Elections certified that the initiative petition calling for Proposition M to be placed on the ballot had a sufficient number of valid signatures to qualify the measure for the ballot.

10,029 signatures were required to place an initiative ordinance on the ballot. This number is equal to 2% of the registered voters at the time a "Notice of Intent to Circulate Petition" was published. A random check of the signatures submitted by the proponents of the initiative petition prior to the July 8, 2024, submission deadline showed that the total number of valid signatures was greater than the number required.



The financial impact of the proposal will depend on a number of factors in future years, including the demand for additional office space in the City, annual government funding allocated for affordable housing development, construction cost trends, and a number of other economic factors. These factors will vary significantly over time.

For illustration, had the ordinance been in place for the last ten years, and given the pace of office space and affordable housing development during that period, the ordinance would have resulted in an average annual reduction of 560,000 square feet of office space development in the City, resulting in a cumulative reduction of approximately 5.6 million square feet by the end of that period. This reduction in office development would have resulted in lower General Fund property and business tax revenues and lower City costs to provide services to workers in this space. Given current tax rates, we estimate that a loss of 560,000 square feet of office space would lead to a loss of these tax revenues of approximately \$11.5 million per year. Conservative assumptions regarding the use of City services by office workers result in estimated cost savings of between \$4 million and \$7 million annually, indicating a net fiscal loss of between \$4 million and \$7 million per year during this period. On average, these net costs would grow each year as additional office space was foregone. This analysis does not include transit or other infrastructure investments required to support this development, nor does it include development impact fees, bonding capacity, or other City revenues that would be generated by the development itself and could be used for these purposes.

Alternately, the City could avoid these restrictions on office development by producing sufficient affordable housing to meet the specified target. These investments would vary considerably each year based upon a number of factors. For illustration, additional annual investment requirements would have ranged between \$200 million and \$500 million to meet annual affordable housing shortfalls during the ten-year period referenced above. Recent increases in sources available to support affordable housing would likely reduce these shortfalls in future years.

As noted above, the financial impact of the proposed measure in future years would likely vary considerably from this, dependent on a number of factors. The measure would allow the City to borrow square footage

from future office space allotments for large office projects that meet certain affordable housing requirements or for large office projects in Central SoMa that meet certain criteria that are submitted by September 2019. Any amount added to an annual limit through either of these provisions would be deducted from annual limits in later years. The proposed ordinance limits approval to a total of up to 6 million square feet of Central SoMa large office projects after January 1, 2019 unless at least 15,000 new housing units are approved in the wider SoMa neighborhood.

How "E" Got on the Ballot

On November 8, 2019, the Department of Elections certified that the initiative petition calling for Proposition E to be placed on the ballot had a sufficient number of valid signatures to qualify the measure for the ballot.

9,485 signatures were required to place an initiative ordinance on the ballot. This number is equal to 5% of the total number of people who voted for Mayor in 2015. A random check of the signatures submitted by the proponents of the initiative petition prior to the November 4, 2019, submission deadline showed that the total number of valid signatures was greater than the number required.

This measure requires 50%+1 affirmative votes to pass.

The above statement is an impartial analysis of this measure. Arguments for and against this measure immediately follow. The full text begins on page 75. Some of the words used in the ballot digest are explained starting on page 30.



CITY AND COUNTY OF SAN FRANCISCO
DEPARTMENT OF ELECTIONS

John Arntz, Director

Certified Mail: 7017 0530 0000 4140 2066

July 23, 2026

Nicholas L. Sanders, Esq.
The Political Law Group LLP
1215 K Street, Suite 1750
Sacramento CA 95814

RE: Certification for the initiative measure entitled **ALLOWING PRIVATE VEHICLES ON THE GREAT HIGHWAY IN SUNSET DUNES PARK**

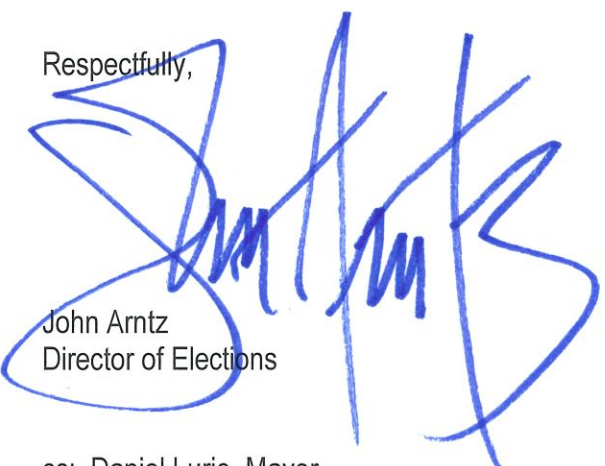
As prescribed under *California Elections Code* §9115(a), the San Francisco Department of Elections has completed its review of a random sampling of 500 of the 15,924 signatures submitted for the initiative measure **ALLOWING PRIVATE VEHICLES ON THE GREAT HIGHWAY IN SUNSET DUNES PARK**.

Based on this statistical sampling, the total number of valid signatures was determined to be greater than the 10,615 valid signatures required for qualification. The number of valid signatures required to qualify this initiative measure was determined by calculating 2% of the number of registered voters in the City and County of San Francisco (S.F. Charter §14.101).

I hereby certify that the following initiative measure, **ALLOWING PRIVATE VEHICLES ON THE GREAT HIGHWAY IN SUNSET DUNES PARK**, is sufficient and qualifies for the next general, municipal, or statewide election in the City and County of San Francisco at any time after 90 days from the date of this certification of sufficiency.

If you have any questions or need additional information, please call (415) 554-6100.

Respectfully,



John Arntz
Director of Elections

cc: Daniel Lurie, Mayor
David Chiu, City Attorney
Angela Calvillo, Clerk of the Board of Supervisors