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RECEIVED
June 13, 2025
**Commission on
State Mandates**

June 13, 2025

Juliana F. Gmur
Executive Director
Commission on State Mandates
980 Ninth Street, Suite 300
Sacramento, CA 95814

And Parties, Interested Parties, and Interested Persons (See Mailing List)

Re: Rebuttal to the Department of Finance
Internet Websites and Email Addresses, 24-TC-04
Statutes 2023, Chapter 586 (AB 1637)
Government Code Section 50034(a)(1)-(2) & (b)
County of Santa Clara, Claimant

Dear Director Gmur:

The County of Santa Clara ("County") files this rebuttal to the Comment of the California Department of Finance ("DOF") on test claim 24-TC-04 ("Test Claim"). The Test Claim argues that Government Code section 50034, subsections (a)(1)-(2) and (b) ("Section 50034"), added by Assembly Bill No. 1637 (Stats. 2023, ch. 586) ("AB 1637"), imposes a reimbursable mandate pursuant to article XIII B, section 6 of the California Constitution ("Section 6").

DISCUSSION

Section 6 requires the State of California ("State") to reimburse local governments for the costs of complying with a State statute, wherever (1) the statute "compels the local agency to act," (2) "the compelled activity requires the agency to provide a new program or higher level of service," and (3) none of seven statutory or four constitutional exceptions to the State's responsibility to reimburse local

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governments applies. *Coast Cmty. Coll. Dist. v. Commission on State Mandates*, 13 Cal. 5th 800, 808 (2022) (citation omitted). The Test Claim argues that in enacting AB 1637, the California legislature created a reimbursable mandate that compels cities and counties to provide a new program by ensuring that their websites, web applications, and email addresses use “.ca.gov” or “.gov” domain names by January 1, 2029. The Test Claim estimates that its activities in compliance with Section 50034’s mandate will cost the County approximately \$918,868. On May 23, 2025, the DOF filed a Comment on the County’s Test Claim that raises no arguments to rebut—and in essence supports—the County’s position in the Test Claim that these costs are reimbursable pursuant to Section 6.

First, the Test Claim argues that Section 50034 “compels . . . local agenc[ies] to act” because it leaves the County without discretion concerning whether to migrate its web and email services to .ca.gov or .gov. See *Coast Cmty. Coll. Dist.*, 13 Cal. 5th at 815. A statute compels local government action under Section 6 where it “establishes conditions under which the state, rather than local officials, has made the decision *requiring* [local entities] to incur the costs of” providing a new program. *San Diego Unified Sch. Dist. v. Commission on State Mandates*, 33 Cal. 4th 859, 880 (2004) (emphasis added). The Comment appears to support the argument that Section 50034 compels local government action, in stating: “AB 1637 added Government Code section 50034 to *require* public websites of cities and counties to have a ‘.gov’ or a ‘.ca.gov’ domain name or to redirect to such a domain name by January 1, 2029. This bill also *requires* the email addresses of city and county employees to have a ‘.gov’ or ‘.ca.gov’ domain name by the same timeframe.” DOF Comment at 1 (emphasis added).

Second, the Test Claim argues that Section 50034 creates a new program. A statute creates a new program if its mandate “did not exist prior to the enactment of” the statute and it involves either “(1) programs that carry out the governmental function of providing services to the public, or (2) laws which, to implement a state policy, impose unique requirements on local governments and do not apply generally to all residents and entities in the state.” *San Diego Unified Sch. Dist.* 33 Cal. 4th at 874, 878 (2004) (citation omitted). Again, the Comment does not contradict, and in fact appears to support, this argument. As noted above, the Comment describes Section 50034 as establishing “require[ments]” that apply exclusively to certain local governments and relate to their provision of government web and email services. DOF Comment at 1. The Comment also confirms that this program is new: “Prior to 2024 and the passage of AB 1637, local agencies were not required to transition their internet websites and email addresses to ‘.gov’ or ‘.ca.gov’ domains.” *Id.*

Third, the Test Claim argues that none of the seven conditions in Government Code section 17556 or four conditions in Section 6 that free the State from the requirement to reimburse local governments for the costs of carrying out a State-mandated program applies to Section 50034. The Comment does not suggest

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otherwise. It is ultimately the State's burden to demonstrate that the existence of any of these conditions frees it from the requirement to reimburse local governments for the costs of carrying out a State-mandated program. *Department of Fin. v. Commission on State Mandates*, 1 Cal. 5th 749, 769 (2016).

The Comment recommends that if the Commission on State Mandates determines AB 1637 imposes a reimbursable mandate, it should "examine the estimated costs cited by the Claimant to ensure that only one-time costs related to the domain migration of internet websites and email addresses to '.gov' or 'ca.gov' are included." DOJ Comment at 2. The Test Claim and Declaration of Matt Woo appended to the Test Claim list costs for only one-time activities the County must undertake to migrate its websites, web applications, and email addresses to the .gov domain in compliance with Section 50034. These activities are not intended to incur ongoing costs for compliance after they have been completed.

CONCLUSION

The County respectfully requests that the Commission on State Mandates find that the State must compensate the County and other local governments for the costs they incur in complying with the State's mandatory new program under Sections 50034.

I certify by my signature below, under penalty of perjury under the laws of the State of California, that the foregoing is true and complete to the best of my personal knowledge, information, or belief.

Sincerely,

June 13, 2025

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A handwritten signature in black ink, appearing to read "Joshua Walden", is written over a horizontal line.

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DECLARATION OF SERVICE BY EMAIL

I, the undersigned, declare as follows:

I am a resident of the County of Sacramento and I am over the age of 18 years, and not a party to the within action. My place of employment is 980 Ninth Street, Suite 300, Sacramento, California 95814.

On June 16, 2025, I served the:

- **Current Mailing List dated June 6, 2025**
- **Claimant's Rebuttal Comments filed June 13, 2025**

Internet Websites and Email Addresses, 24-TC-04

Statutes 2023, Chapter 586 (AB 1637); Government Code Section 50034(a)(1)-(2) and (b)

County of Santa Clara, Claimant

by making it available on the Commission's website and providing notice of how to locate it to the email addresses provided on the attached mailing list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on June 16, 2025 at Sacramento, California.



David Chavez

Commission on State Mandates

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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 6/6/25

**Claim
Number:** 24-TC-04

Matter: Internet Websites and Email Addresses

Claimant: County of Santa Clara

TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

Each commission mailing list is continuously updated as requests are received to include or remove any party or person on the mailing list. A current mailing list is provided with commission correspondence, and a copy of the current mailing list is available upon request at any time. Except as provided otherwise by commission rule, when a party or interested party files any written material with the commission concerning a claim, it shall simultaneously serve a copy of the written material on the parties and interested parties to the claim identified on the mailing list provided by the commission. (Cal. Code Regs., tit. 2, § 1181.3.)

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