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July 6, 2026



Juliana F. Gmur
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Commission on State Mandates
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And Parties, Interested Parties, and Interested Persons (See Mailing List)

Re: Comment on Request to Amend Parameters and Guidelines
Internet Websites and Email Addresses, 25-PGA-02
Statutes 2023, Chapter 586 (AB 1637)
Government Code section 50034(a)(1)-(2) & (b)
County of Santa Clara, Claimant

Dear Director Gmur:

In support of City of La Puente's Request to Amend Parameters and Guidelines ("Request"), the County of Santa Clara ("County") asks that the Commission confirm whether the Parameters and Guidelines require the State to reimburse cities and counties for the costs of temporarily hosting duplicate email licenses in migrating email systems to .ca.gov or .gov. (Request, *Internet Websites and Email Addresses*, No. 25-PGA-02 (June 8, 2026).) If this activity is not already contemplated in the Parameters and Guidelines, the County joins City of La Puente in asking the Commission to amend that decision to include it among the reimbursable mandated one-time activities. Also in support of the Request, the County asks that the Commission amend the Parameters and Guidelines to include the one-time cost of printing letterhead and identification cards to replace versions showing outdated web and email addresses. (Request.)

Letter to: Commission on State Mandates
Re: Rebuttal to Department of Finance, 25-PGA-02
Date: July 6, 2026
Page 2 of 5

DISCUSSION

Government Code section 50034 (“Test Claim Statute”) was enacted to ensure that, “when Californians look for government information or services, they can know with confidence they are receiving official information.” (Commission on State Mandates, Test Claim Decision, *Internet Websites and Email Addresses*, No. 24-TC-04 (Dec. 5, 2025) at p. 41 (“Test Claim Decision”) [quoting Assemb. Comm. analysis].) Accordingly, the Legislature characterized migrating email addresses to .ca.gov or .gov as “a matter of statewide concern.” (*Id.* at p. 8 [quoting Stats. 2023, ch. 586, § 3].) The County supports City of La Puente’s request that the Commission determine that maintaining legacy email addresses during the period of transition to the new domain and updating printed letterhead and identification cards are reimbursable components of the Test Claim Statute’s mandate. (Request.) Notably, the State Controller’s Office does not dispute that these tasks are mandated and reimbursable. (State Controller’s Office, Comment on Request, No. 25-PGA-02 (June 30, 2026).)

Commission regulations provide that Parameters and Guidelines shall describe the reimbursable costs associated with implementation of a State mandate, including “one-time costs and on-going costs, and reasonably necessary activities required to comply” with the law. (Code Regs. § 1183.7(d).) Reasonably necessary activities are “those activities necessary to comply with the statutes, regulations and other executive orders found to impose a state-mandated program.” (*Ibid.*) For many counties and cities, temporarily maintaining legacy email addresses as aliases to ensure that emails from the public are received and replacing letterhead and identification cards to provide up-to-date email and web addresses are reasonably necessary one-time activities that will protect communication between local governments and their residents and promote trust in government, consistent with the Test Claim Statute and its legislative history.

I: Temporary Concurrent Hosting of Old and New Email Addresses

The County urges the Commission to confirm that the costs of “hav[ing] both old and new email addresses active for a certain transition period” (Request) is already provided for in the Parameters and Guidelines, as a component of the “one-time activit[y]” of “[e]nsur[ing] that each public email address provided for the city’s or county’s employees utilizes a ‘.gov’ or ‘.ca.gov’ domain name by January 1, 2029” (Decision & Parameters & Guidelines, *Internet Websites and Email Addresses*, No. 25-PGA-02 (Feb. 18, 2026) at p. 2 (“Parameters & Guidelines”)). A key purpose of maintaining legacy email addresses in alias mode for a limited time after migrating an agency’s email domain is to ensure that emails sent to outdated addresses will be received and forwarded to the new employee and service accounts so the public is not thwarted from communicating with their local governments overnight. (Moving to .gov, U.S. CISA, <https://get.gov/domains/moving/#plan-to-redirect-traffic-from-your-old-domain-to-your-new-one> [stating that email aliases ensure “that email sent to a prior

Letter to: Commission on State Mandates
Re: Rebuttal to Department of Finance, 25-PGA-02
Date: July 6, 2026
Page 3 of 5

domain name is still delivered”].) This part of the migration process is critical to compliance with the Test Claim Statute in a manner that permits a seamless transition to the .ca.gov or .gov domain without putting community members’ access to essential programs and services at risk. Therefore, temporarily maintaining duplicate email addresses should be treated as an activity already contemplated in the Parameters and Guidelines. Otherwise, the Commission should amend the Parameters and Guidelines to incorporate this reasonably necessary one-time compliance activity.

II: Replacing Letterhead and Identification Cards Bearing Outdated Web and Email Addresses

The County additionally agrees that printing replacements for letterhead and identification cards that bear outdated web and email addresses is a reimbursable one-time activity that is reasonably necessary for compliance with the Test Claim Statute.

First, it would undermine the legislative intent—to ensure that “when Californians look for government information or services, they can know with confidence they are receiving official information” (Test Claim Decision at p. 41)—if counties and cities continue to direct the public to disused web and email accounts in paper documents. Official government guidance on migrating email accounts to the .gov domain advises entities to “updat[e]” “paper products (like letterhead or business cards)” that show prior domain names. (Moving to .gov, <https://get.gov/domains/moving/>.) Doing otherwise risks misdirecting users to false government websites that might promote distrust of government, “spread misinformation,” and even “lure . . . users into sharing personal information, making payments, and conducting other compromising activities.” (See Test Claim Decision, at p. 27 [quoting Assemb. Comm. analysis of threats associated with false government websites].)

For this reason, reprinting paper materials bearing outdated web and email addresses is reasonably necessary to comply with the Test Claim Statute. Indeed, seeking to avoid such adverse outcomes, the Legislature recognized, in analyzing the Test Claim Statute, that “the costs to migrate a local agency’s systems included . . . ‘changes to outreach and promotional materials, business cards, letter head, and elections materials.’” (*Id.* at p. 40 [quoting Assemb. Comm. analysis]; see also *id.*, Ex. K-15 at p. 3 [similar, Sen. Comm. analysis].)

Second, these activities are reasonably necessary because existing law requires local governments to provide up-to-date contact information on paper communications and identification cards. Courts and the Commission frequently find mandatory new programs under Section 6 based on compulsory language in legislation outside a test claim statute. Thus, in assessing this Test Claim Statute under Section 6, the Commission reasoned that “the question . . . depends on whether cities and counties are legally compelled to have a public website in the first place.” (Test Claim Decision

Letter to: Commission on State Mandates
Re: Rebuttal to Department of Finance, 25-PGA-02
Date: July 6, 2026
Page 4 of 5

at p. 31.) The requirement is a reimbursable mandate, even though the statute does not “explicitly say all cities and counties shall maintain a public internet website,” because preexisting laws require local governments to maintain websites in particular circumstances. (*Id.* at pp. 31-34; see also *San Diego Unified Sch. Dist. v. Commission on State Mandates* (2004) 33 Cal.4th 859, 883-84 [holding that hearings required prior to student expulsion under one statute are reimbursable when the expulsion is conducted under a mandate imposed by another].)

Here, the Test Claim Statute requires local governments to reprint letterhead and identification cards bearing abandoned web and email domains because multiple State laws require local governments to provide accurate contact information on official stationery and written communication. For example, “[t]he letterhead or other prominent location on official stationery of each . . . county [and] city . . . used in communication with the public, shall include the telephone number of such entity.” (Gov. Code, § 7525.) Such letterhead must also include “the address and telephone number . . . to which inquiry regarding the subject matter of the specific communication may be made.” (*Id.*, § 7526.) Relatedly, a city or county “shall, when being identified by such entity for any purpose, be identified as a . . . city [or] county,” including “on all letterhead stationery of such public agency . . . and on all identification cards used to identify a representative of a public agency.” (*Id.*, § 7530.)

In enacting Government Code sections 7525 and 7526 (originally codified at sections 7800 and 7801), the Legislature stated that it “hereby finds and declares that the necessity for citizens of this state to avail themselves of contact with local agencies . . . is a matter of statewide concern necessitating statewide legislation requiring that the letterhead or other prominent location of official stationery of local agencies include the telephone number of such entity.” (Stats. 1975, ch. 117, § 2; Stats. 1976, ch. 573, § 2 [same].) Though the County is unaware of a law requiring cities and counties to print web and email addresses on letterhead and identification cards, it is indisputable that many local governments already include this information alongside the required contact and identifying information as a matter of standard practice. For such counties and cities, it is reasonably necessary under the Test Claim Statute to reprint these documents with the updated domain names. To do otherwise would put a local government’s residents at risk of losing access to accurate information and essential programs, developing mistrust in government, and sharing personal information with bad actors. These potential outcomes are irreconcilable with the legislative intent underlying the Test Claim Statute and the laws governing agency identification.

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Letter to: Commission on State Mandates
Re: Rebuttal to Department of Finance, 25-PGA-02
Date: July 6, 2026
Page 5 of 5

CONCLUSION

The County respectfully supports City of La Puente's Request and asks that the Commission confirm that the State must compensate counties for the one-time costs of hosting duplicate email licenses during the transition to .gov and printing new letterhead and business cards to replace versions showing outdated web and email addresses.

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,

July 6, 2026

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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 July 7, 2026, I served the:

- **Current Mailing List dated July 3, 2026**
- **County of Santa Clara's Comments on Request to Amend Parameters and Guidelines filed July 6, 2026**

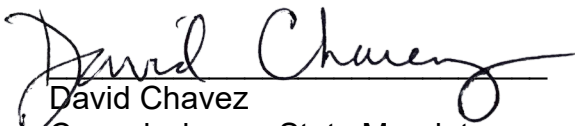
Internet Websites and Email Addresses, 25-PGA-02

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

City of La Puente, Requester

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 July 7, 2026 at Sacramento, California.


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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 7/3/26

Claim Number: 25-PGA-02 (24-TC-04)

Matter: Internet Websites and Email Addresses

Requester: City of La Puente

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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