STATE of CALIFORNIA
COMMISSION ON STATE MANDATES

October 29, 2026

Ms. Anne Kato
State Controller's Office
Local Government Programs and Services Division
3301 C Street, Suite 740
Sacramento, CA 95816

Mr. Joshua Walden
County of Santa Clara
Office of County Counsel
70 West Hedding Street, 9th Floor
San Jose, CA 95110

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

Re: Draft Proposed Statewide Cost Estimate, Schedule for Comments, and Notice of Hearing
Internet Websites and Email Addresses, 24-TC-04
Statutes 2023, Chapter 586 (AB 1637); Government Code Section 50034(a)(1)-(2) and (b)

Dear Ms. Kato and Mr. Walden:

The Draft Proposed Statewide Cost Estimate for the above-captioned matter is enclosed for your review and comment.

Written Comments: Written comments may be filed on the Draft Proposed Statewide Cost Estimate by **November 9, 2026**. You are advised that comments filed with the Commission are required to be electronically filed (e-filed) in an unlocked legible and searchable PDF file, using the Commission's Dropbox. (Cal. Code Regs., tit. 2, § 1181.3(f).) Refer to https://www.csm.ca.gov/dropbox.shtml on the Commission's website for electronic filing instructions. If e-filing would cause the filer undue hardship or significant prejudice, filing may occur by first class mail, overnight delivery or personal service only upon approval of a request to the executive director. (Cal. Code Regs., tit. 2, § 1181.3(j).)

Hearing: This matter is set for hearing on **Friday, December 4, 2026, in person at 10:00 a.m., at The Jesse M. Unruh State Office Building, 915 Capitol Mall, Room 121, The Boardroom, Sacramento, California, 95814 and via Zoom.**

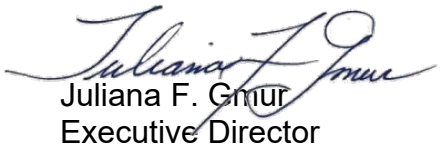
The Proposed Statewide Cost Estimate will be issued on or about November 20, 2026.

This matter is proposed for the Consent Calendar. Please let us know in advance if you oppose having this item placed on the Consent Calendar.

Please also notify Commission staff not later than noon on December 1, 2026, that you or a witness you are bringing plan to testify and please specify the names of the people who will be speaking for inclusion on the witness list and the names and email addresses of the people who will be speaking both in person and remotely to receive a hearing panelist link in Zoom.

The last communication from Commission staff will be the Proposed Statewide Cost Estimate, which will be issued approximately two weeks prior to the hearing, and it is incumbent upon the participants to let Commission staff know if they wish to testify or bring witnesses.

Very truly yours,



Juliana F. Gmur
Executive Director

Hearing Date: December 4, 2026

ITEM ___

DRAFT PROPOSED STATEWIDE COST ESTIMATE

$3,485,546 - $34,873,519
Initial Claim Period

The Second Half of Fiscal Year 2023-2024 and Fiscal Year 2024-2025

$2,719,200 - $36,497,996 Plus the Implicit Price Deflator
Fiscal Year 2025-2026 and Following

Government Code Sections 50034(a)(1)-(2) & (b),
as Added by Statutes 2023, Chapter 586 (AB 1637)

Internet Websites and Email Addresses

24-TC-04

The Commission on State Mandates (Commission) adopted this Statewide Cost Estimate by a vote of [vote count will be included in the adopted Statewide Cost Estimate] during a regularly scheduled hearing on December 4, 2026 as follows:

Member	**Vote**
Lee Adams, County Supervisor	
Karen Greene Ross, Public Member	
Deborah Gallegos, Representative of the State Controller	
William Pahland, Representative of the State Treasurer, Vice Chairperson	
Michele Perrault, Representative of the Director of the Department of Finance, Chairperson	
Alexander Powell, Representative of the Director of the Office of Land Use and Climate Innovation	

STAFF ANALYSIS

Summary of the Mandate, Eligible Claimants, and Period of Reimbursement

This Statewide Cost Estimate addresses state-mandated activities arising from Government Code section 50034(a)(1)-(2) and (b), as added by Statutes 2023, chapter 586, effective January 1, 2024.

The Commission adopted the Test Claim Decision on December 5, 2025,[1] and the Decision and Parameters and Guidelines on February 13, 2026, approving reimbursement beginning January 1, 2024, for any city, county, or city and county

[1] Exhibit A, Test Claim Decision.

whose costs for this program are paid from proceeds of taxes and that incurs increased costs as a result of this mandate, is eligible to claim reimbursement.[2]

The initial reimbursement period is January 1, 2024 through June 30, 2025. Eligible claimants were required to file initial claims with the State Controller's Office (Controller) by September 16, 2026. Late initial reimbursement claims may be filed until September 16, 2027, but will incur a 10 percent late filing penalty of the total amount of the initial claim without limitation.[3]

Reimbursable Activities

The Commission approved the following reimbursable activities for this program:

1. Ensure that the Internet website used by the public (including any webpages, web applications, or other related resources within the website) utilizes either a ".gov" top-level domain name or a ".ca.gov" second-level domain name by January 1, 2029.[4]
2. Ensure any websites (including any webpages, web applications, or other related resources within the website) with a non-compliant domain name the city or county continues to maintain after January 1, 2029 redirects users to a website with a compliant domain name.[5]
3. Ensure 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.[6]

Offsetting Revenues and Reimbursements

The Decision and Parameters and Guidelines specify that any offsetting revenues (i.e., funds that are not a claimant's proceeds of taxes), are required to be identified and deducted from the costs claimed, including but not limited to, state and federal funds, any service charge, fee, or assessment authority to offset all or part of the costs of this program, and any other funds that are not the claimant's proceeds of taxes shall be identified and deducted from any claim submitted for reimbursement.

Only the County of Orange claimed offsetting revenues in the initial filings in the amount of $1,097.

Statewide Cost Estimate

Staff reviewed 50 unaudited reimbursement claims submitted by 41 claimants—12 counties and 29 cities and towns—as compiled by the Controller. Staff developed the Statewide Cost Estimate based on the assumptions and methodology discussed herein.

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[2] Exhibit B, Decision and Parameters and Guidelines.

[3] Government Code section 17561(d)(3).

[4] Government Code section 50034(a)(1).

[5] Government Code section 50034(a)(2).

[6] Government Code section 50034(b).

Table 1. Initial Reimbursement Period Cost Estimate

1. Ensure that the Internet website used by the public (including any webpages, web applications, or other related resources within the website) utilizes either a ".gov" top-level domain name or a ".ca.gov" second-level domain name by January 1, 2029.	$1,919,628 - $24,533,688
2. Ensure any websites (including any webpages, web applications, or other related resources within the website) with a non-compliant domain name the city or county continues to maintain after January 1, 2029 redirects users to a website with a compliant domain name.	$569,729 - $1,518,266
3. Ensure 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.	$770,685 - $9,849,636
Total Direct Costs	$3,260,042 - $35,901,590
Indirect Costs identified	$226,601 - $2,513,111
Offsetting Revenues or Other Reimbursements	-($1,097 - $0)
Subtotal	$3,485,546 - $38,414,701
10 Percent Late Filing Penalty	-($0 - $3,541,182)
Total Costs	**$3,485,546 - $34,873,519**

Table 2. Estimated Annual Costs for Fiscal Year 2025-2026 and Following

1. Ensure that the Internet website used by the public (including any webpages, web applications, or other related resources within the website) utilizes either a ".gov" top-level domain name or a ".ca.gov" second-level domain name by January 1, 2029.	$1,763,085 - $23,598,066
2. Ensure any websites (including any webpages, web applications, or other related resources within the website) with a non-compliant domain name the city or county continues to maintain after January 1, 2029 redirects users to a website with a compliant domain name.	$94,483 - $1,295,221
3. Ensure 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.	$665,038 - $8,901,154
Total Direct Costs	$2,522,606 - $33,794,441
Indirect Costs identified	$196,594 - $2,703,555
Offsetting Revenue	-($0)
Subtotal	$2,719,200 - $36,497,996
Late Filing Penalty	-($0)
Total Costs	**$2,719,200 - $36,497,996**

Assumptions

1. The amount claimed for the initial period of reimbursement may be higher if late or amended claims are filed. Of the 58 eligible county and the 483 city claimants,[7] only 41 filed claims for the initial period of reimbursement from January 1, 2024 through June 30, 2025.
2. For purposes of calculating the high-end projection for the initial period of reimbursement of this Statewide Cost Estimate, it is presumed that no late or amended claims will be filed by the 41 claimants. This Statewide Cost Estimate is based on the initial claims filed and the claims which the eligible non-filer claimants could file late.
3. Costs may be lower than projected because some cities and counties are already in compliance with the requirements of the test claim statute and thus, will not incur costs for compliance. As noted by the Assembly Committee on Appropriations: "Of California's 14 urban counties, five have .gov websites, including the counties of Contra Costa, Los Angeles, San Bernardino, San Diego and San Francisco. Of the state's 13 largest cities, 10 have a .gov website. These cities include Fresno, Los Angeles, Long Beach, Oakland, Riverside, Sacramento, San Diego, San Francisco, San Jose and Stockton."[8]

   Further, since these 15 cities and counties did not file claims during the initial claiming period, it is assumed that they will not be filing claims and will not be counted as part of the eligible non-filers for all calculations.
4. Activity 2 is limited to the costs to "ensure any websites (including any webpages, web applications, or other related resources within the website) with a non-compliant domain name the city or county continues to maintain after January 1, 2029 redirects users to a website with a compliant domain name." While not all claimants included costs for this activity, those that did range from $73 to $23,793. However, the County of Alameda's claim for Activity 2 is $453,612. Thus, due to the unusually high number and the possibility of skewed projection results, the County's claim amounts for Activity 2 will not be included in the calculations for late, eligible non-filers for the initial claiming period nor for fiscal year 2025-2026 and following.
5. For purposes of calculating fiscal year 2025-2026 and following, it is presumed that the claimants that filed only for fiscal year 2023-2024 of the initial filing period and not for fiscal year 2024-2025, have filed for all costs under the

[7] Exhibit X (2), Review of Proposed Initiative Regarding Local Taxes, A.G. File No. 25-0004, Amendment #1, July 1, 2025, Legislative Analyst's Office, https://lao.ca.gov/BallotAnalysis/Initiative/2025-004 (accessed October 26, 2026) page 1.

[8] Exhibit X (1), Assembly Committee on Appropriations, Analysis of AB 1637, as amended April 27, 2023, pages 2-3.

program and will not file for any future costs. Thus, they will be excluded from the calculations for fiscal year 2025-2026 and following.

6. Costs may be lower than projected if either no reimbursable costs were incurred or if costs of less than $1,000 were incurred by non-filers, in which case a late reimbursement claim cannot be filed.[9]
7. Costs may be lower if the Controller audits the claims and determines that costs were improperly claimed or were not supported or that other offsetting revenues (i.e., funds that are not the claimant's proceeds of taxes) were used by a claimant to pay for the reimbursement activities. Future costs may be lower if claimants receive offsetting revenue from, for example, the State and Local Cybersecurity Grant Program (SLCGP) or other federal or state funding or grants.[10]
8. Future costs will taper off and end because the activities are required to be completed by January 1, 2029. As explained in the Test Claim Decision, "As Finance pointed out, the act of migrating an existing website or email address to a new domain name is a one-time requirement and should not include ongoing costs once migration is complete. The claimant agrees with this, asserting that all claimed costs were for one-time activities and it does not anticipate any ongoing costs after compliance is completed."[11] Thus, after fiscal year 2029-2030, no further claims should be filed.
9. Future costs may be higher because a Request for a Parameters and Guidelines Amendment was filed in this matter which may result in additional reimbursable activities. Any such request filed within 90 days of the claiming deadline for initial claims will apply to all years eligible for reimbursement in the original parameters and guidelines.[12] As noted above, the deadline for submitting initial reimbursement claims was September 16, 2026. The Request was filed on June 6, 2026, which is before the deadline to submit initial reimbursement claims. Thus, any additional activities approved by the Commission will be eligible for reimbursement as of January 1, 2024. The Request is currently scheduled to be heard on December 4, 2026.

Methodology

A. Initial Reimbursement Period Cost Estimate

As explained below, the low-end statewide cost estimate represents the costs actually claimed. The high-end statewide cost estimate, in addition to indirect costs actually claimed, represents the costs actually claimed plus the costs that could be claimed in late claims. These estimates are based on 524 eligible claimants, which is 541 total

[9] Government Code section 17564.

[10] Exhibit X (1), Assembly Committee on Appropriations, Analysis of AB 1637, as amended April 27, 2023, page 3.

[11] Exhibit A, Test Claim Decision, page 41, footnotes omitted.

[12] Government Code section 17557(d)(1).

eligible claimants minus the 15 non-filing claimants identified under Assumption no. 3 and minus the two claimants that only filed for 2023-2024 costs as explained under Assumption no. 5.

Activity 1. consists of ensuring that the Internet website used by the public utilizes either a ".gov" top-level domain name or a ".ca.gov" second-level domain name by January 1, 2029. Activity 1. estimated claims are calculated by using the average costs claimed per filer, multiplied by the eligible claimants that have not yet filed claims during the initial claiming period.

> Activity 1. actual costs claimed [$1,919,628] / the number of filers [41] = average Activity 1. cost per filer [$46,820]
>
> Average Activity 1. cost per filer [$46,820] x number of non-filers [483] = total estimated non-filer Activity 1. costs [$22,614,060]
>
> Activity 1. actual costs claimed [$1,919,628] + estimated non-filer Activity 1. costs that could be claimed in late claims [$22,614,060] = Total potential Activity 1. costs [$24,533,688]

Activity 2. consists of ensuring any websites (including any webpages, web applications, or other related resources within the website) with a non-compliant domain name the city or county continues to maintain after January 1, 2029 redirects users to a website with a compliant domain name. Activity 2. estimated claims are calculated by using the average costs claimed per filer (excluding the County of Alameda's figures), multiplied by the eligible claimants that have not yet filed claims during the initial claiming period.

> Activity 2. actual costs claimed [$116,117] / the number of filers [40] = average Activity 2. cost per filer [$2,903]
>
> Average Activity 2. cost per filer [$2,903] x number of non-filers [483] = total estimated non-filer Activity 2. costs [$1,402,149]
>
> Activity 2. actual costs claimed [$116,117] + estimated non-filer Activity 2. costs that could be claimed in late claims [$1,402,149] = Total potential Activity 2. costs [$1,518,266]

Activity 3. consists of ensuring 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. Activity 3. estimated claims are calculated by using the average costs claimed per filer, multiplied by the eligible claimants that have not yet filed claims during the initial claiming period.

> Activity 3. actual costs claimed [$770,685] / the number of filers [41] = average Activity 3. cost per filer [$18,797]
>
> Average Activity 3. cost per filer [$18,797] x number of non-filers [483] = total estimated non-filer Activity 3. costs [$9,078,951]
>
> Activity 3. actual costs claimed [$770,685] + estimated non-filer Activity 3. costs that could be claimed in late claims [$9,078,951] = Total potential Activity 3. costs [$9,849,636]

Indirect Costs: The low-end of the range for indirect costs is those indirect costs actually claimed. The high-end, in addition to indirect costs actually claimed, assumes that all eligible claimants who have not yet filed claims will file claims for indirect costs at the same average rate actually claimed, which is calculated by dividing indirect costs claimed by direct costs claimed equals average indirect cost rate (as a percentage). Then multiply the average indirect cost rate by the estimated direct costs.

> Indirect Costs Actually Claimed [$226,601] / Direct Costs Actually Claimed [$3,260,042] = Average Indirect Cost Rate [7%].
>
> Indirect Cost Rate [7%] x Estimated Direct Costs (sum of all estimated activity costs for the initial claim period) [$35,901,590] = High-End of the Estimated Indirect Costs [$2,513,111].

Offsetting Revenues: The low-end is $1,097, which is the offsetting revenue claimed by the County of Orange. However, because only one claimant claimed a small amount of offsetting revenue, there is no reliable basis to project the high-end. Thus, the high-end is projected to be $0.

Late Filing Penalties: The low-end is $0 because none of the initial claims compiled by the Controller were assessed a late filing penalty. The high-end assumes that all non-filers will file claims for the initial period of reimbursement, which will be subject to a late filing penalty of ten percent of non-filer direct plus indirect costs.

> Indirect Cost Rate [7%] x Estimated Non-filer Direct Costs [$33,095,160] = Estimated Non-filer Indirect Costs [$2,316,661].
>
> Estimated Non-filer Direct Costs [$33,095,160] + Estimated Non-filer Indirect Costs [$2,316,661] = Estimated Non-filer Direct and Indirect Costs [$35,411,821]
>
> Estimated Non-filer Direct and Indirect Costs [$35,411,821] x Late filing penalty [10%] = Estimated Non-filer Late Filing Penalties [$3,541,182].
>
> Actual Late Filing Penalties [$0] + Estimated Non-filer Late Filing Penalties [$3,541,182] = High-End of Estimated Late Filing Penalties [$3,541,182].

B. Projected Annual Costs for Fiscal Year 2025-2026 and Following

The low-end of the range assumes that the same claimants that filed reimbursement claims for the initial period of reimbursement will continue to file annual reimbursement claims and incur similar costs. The high-end of the range assumes that all eligible claimants, as calculated above, will file annual claims and is calculated by using the average costs claimed by the filers in fiscal 2024-2025 and the number of eligible claimants that have not yet filed claims. As explained above, costs will decline over time and no costs are expected to be claimed after fiscal year 2029-2030.

Activity 1. consists of ensuring that the Internet website used by the public utilizes either a ".gov" top-level domain name or a ".ca.gov" second-level domain name by January 1, 2029. Activity 1. estimated claims are calculated by using the average costs claimed per filer in fiscal year 2024-2025, multiplied by the eligible claimants that have not yet filed claims during fiscal year 2024-2025 (excluding the filers that only filed in 2023-2024).

Activity 1. actual costs claimed in fiscal year 2024-2025 [$1,763,085] / the number of filers in fiscal year 2024-2025 [39] = average Activity 1. cost per filer [$45,207]

Average Activity 1. cost per filer [$45,207] x number of non-filers [483] = total estimated non-filer Activity 1. costs [$21,834,981]

Activity 1. actual costs claimed in fiscal year 2024-2025 [$1,763,085] + estimated non-filer Activity 1. costs that could be claimed in late claims [$21,834,981] = Total potential Activity 1. costs [$23,598,066]

Activity 2. consists of ensuring any websites (including any webpages, web applications, or other related resources within the website) with a non-compliant domain name the city or county continues to maintain after January 1, 2029 redirects users to a website with a compliant domain name. Activity 2. estimated claims are calculated by using the average costs claimed per filer (excluding the County of Alameda) in fiscal 2024-2025, multiplied by the eligible claimants that have not yet filed claims during fiscal 2024-2025 (excluding the filers that only filed in 2023-2024).

Activity 2. actual costs claimed [$94,483] / the number of filers [38] = average Activity 2. cost per filer [$2,486]

Average Activity 2. cost per filer [$2,486] x number of non-filers [483] = total estimated non-filer Activity 2. costs [$1,200,738]

Activity 2. actual costs claimed [$94,483] + estimated non-filer Activity 2. costs that could be claimed in late claims [$1,200,738] = Total potential Activity 2. costs [$1,295,221]

Activity 3. consists of ensuring 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. Activity 3. estimated claims are calculated by using the average costs claimed per filer in fiscal year 2024-2025, multiplied by the eligible claimants that have not yet filed claims during fiscal year 2024-2025 (excluding the filers that only filed in 2023-2024).

Activity 3. actual costs claimed [$665,038] / the number of filers [39] = average Activity 3. cost per filer [$17,052]

Average Activity 3. cost per filer [$17,052] x number of non-filers [483] = total estimated non-filer Activity 3. costs [$8,236,116]

Activity 3. actual costs claimed [$665,038] + estimated non-filer Activity 3. costs that could be claimed in late claims [$8,236,116] = Total potential Activity 3. costs [$8,901,154]

Indirect Costs: The low-end of the range for indirect costs is those indirect costs actually claimed for fiscal year 2024-2025. The high-end, in addition to indirect costs actually claimed, assumes that all eligible claimants will file claims for indirect costs at the same average rate actually claimed for fiscal year 2024-2025.

Indirect Costs Actually Claimed [$196,594] / Direct Costs Actually Claimed [$2,522,606] = Average Indirect Cost Rate [8%].

Indirect Cost Rate [8%] x Estimated Direct Costs (sum of all estimated activity costs for the initial claim period) [$33,794,441] = High-End of the Estimated Indirect Costs [$2,703,555].

Offsetting Revenues: The low-end is $1,097, which is the offsetting revenue claimed by the County of Orange. However, because only one claimant claimed a small amount of offsetting revenue, there is no reliable basis to project future costs. Thus, both the low-end and the high-end are projected to be $0.

Late Filing Penalties: Both the low-end and the high-end are $0 because, in the future, these claims will be part of annual claiming. In addition, there is no basis upon which to predict the filing of late claims and a late filing penalty.

Draft Proposed Statewide Cost Estimate

On October 29, 2026, Commission staff issued the Draft Proposed Statewide Cost Estimate.[13]

Staff Recommendation

Staff recommends that the Commission adopt this Statewide Cost Estimate of $3,485,546 - $34,873,519 for the Initial Claim Period that began on January 1, 2023 and ends on June 30, 2025 and $2,719,200 - $36,497,996 plus the Implicit Price Deflator for fiscal year 2025-2026 and following.

[13] Exhibit C, Draft Proposed Statewide Cost Estimate.

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 October 29, 2026, I served the:

- **Current Mailing List dated October 22, 2026**
- **Draft Proposed Statewide Cost Estimate, Schedule for Comments, and Notice of Hearing issued October 29, 2026**

  Internet Websites and Email Addresses, 24-TC-04
  Statutes 2023, Chapter 586 (AB 1637); Government Code Section 50034(a)(1)-(2) and (b)

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 October 29, 2026 at Sacramento, California.

Jill Magee
_____

Jill Magee
Commission on State Mandates
980 Ninth Street, Suite 300
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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 10/22/26

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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