



County of Monterey

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RECEIVED
April 8, 2025
**Commission on
State Mandates**

April 8, 2025

Commission on State Mandates
980 9th Street, Suite 300
Sacramento, CA 95814

**Re: Comment for Test Claim Filed by Santa Clara County – AB 1637 (2023) –
Unfunded Mandate on Website Domain Conversion to .GOV**

Dear Commissioners,

On behalf of the County of Monterey, I am writing to express strong support for the Test Claim filed by the County of Santa Clara regarding Assembly Bill 1637 (Chapter 251, Statutes of 2023), which imposes an unfunded mandate on local government agencies by requiring the transition of public-facing websites and email domains to a .gov address.

While the intent of AB 1637—to improve cybersecurity and enhance public trust in government communications is commendable, the law imposes a significant and uncompensated financial burden on local governments, the costs of which will be borne by the County of Monterey during a period of significant budgetary challenges. The required migration to .gov domains has involved costs that are not incidental, including but not exclusive to:

- reprinting of public materials, signage, brochures, and letterhead;
- extensive staff time and technical labor for implementation, testing, and maintenance;
- website redesign and infrastructure reconfiguration;
- public awareness campaigns to ensure a smooth transition and minimize confusion of the new website to access critical county resources;
- email migration and IT system updates.

These are real and quantifiable costs that the County of Monterey will absorb without state financial assistance.



Legal Basis for Reimbursement

California's Constitution and state law provide clear protections to local governments against such unfunded mandates:

- **California Constitution, Article XIII B, Section 6** states:
"Whenever the Legislature or any state agency mandates a new program or higher level of service on any local government, the State shall provide a subvention of funds to reimburse that local government for the costs of the program or increased level of service."
- **Government Code § 17514** further defines a state-mandated program as *"any statute or executive order which requires a local agency to implement a program that carries a cost not otherwise required by federal law."*

AB 1637 fits within this definition. The mandate to shift from established and functional domains to .gov addresses is a new and specific state requirement, not required by federal law, and results in additional costs to local agencies. Absent state funding, these costs are borne exclusively by local governments, in violation of constitutional guarantees.

We respectfully urge the Commission on State Mandates to approve Santa Clara County's Test Claim and affirm the State's constitutional and statutory responsibility to reimburse local agencies for implementing AB 1637. Doing so will reinforce the principle of fair governance and support local agencies working diligently to meet state goals in cybersecurity and transparency.


Thank you for your time and consideration.

Sincerely,

DocuSigned by:

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Chief Information Officer
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Signed by:

31B2028C241644B...

Samuel B. Beiderwell
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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 April 9, 2025, I served the:

- **Current Mailing List dated April 9, 2025**
- **Eric Chatham, Chief Information Officer, County of Monterey Comments on the Test Claim filed April 8, 2025**

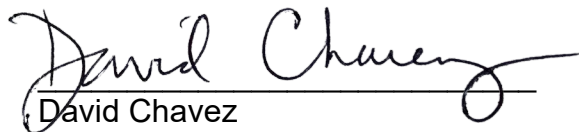
Internet Websites and Email Addresses, 24-TC-04

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 April 9, 2025 at Sacramento, California.



David Chavez

Commission on State Mandates
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(916) 323-3562

COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 4/9/25

**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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