



May 15, 2023

The Honorable Jacqui Irwin  
California State Assembly  
1021 O Street, Suite 6620  
Sacramento, CA 95814-0007

**RE: Assembly Bill 1637 – Local government: internet websites and email addresses Notice of Opposition (As Amended on April 27, 2023)**

Dear Assemblymember Irwin:

NATALIE ROGERS  
Mayor

On behalf of the City of Santa Rosa, I write to express our respectful opposition to Assembly Bill (AB) 1637, which would require local governments to transition their website and e-mail address to the “.gov” or “.ca.gov” domains, no later than January 1, 2025 and without reimbursement for the associated costs by the State.

DIANNA MACDONALD  
Vice Mayor

EDDIE ALVAREZ  
VICTORIA FLEMING  
JEFF OKREPKIE  
CHRIS ROGERS  
MARK STAPP

Configuring and re-issuing thousands of City email addresses would create an unnecessary, costly issue for the City that would direct public resources away from serving city residents, and for minimal to no proven benefit. In addition to basic email functions, email addresses are also used as unique identifiers and login ID’s for numerous systems at our city and many others throughout the State, and as such, are also associated with millions of historical electronic data records.

This unfunded mandate is not the best use of these resources during a time of fiscal instability and uncertainty. Cybersecurity is a tremendous concern for our city. As we’ve seen from the recent attack on the City of Oakland, local governments need to be doing more than ever to protect the critical systems that keep cities running, and that our citizens rely on to keep their data secure. Our community would be much better served if these funds continue to go toward addressing higher priority cybersecurity risk factors and other issues of shared State and local priority such as addressing homelessness, ensuring the public’s safety, and creating housing.

The sheer volume of digital footprint that would need to be converted creates an intricate and costly burden for local government. Further, the task is inordinately and unnecessarily time-consuming. This means that even less of our limited public resources will go towards addressing the myriad of much higher risk cyber threats that have proven fixes we are working to implement. Additionally, pursuing this resource intensive activity for minimal benefit limits our public resources even further from being able to move forward on key issues in our local community, such as continuing our significant investments in local



homelessness response and affordable housing, two areas in which Santa Rosa is a leader. Diverting resources from these critical priorities is short sighted and would have a real impact on the quality of life for our most marginalized residents.

Moreover, the impacts of the measure go beyond websites and email addresses to include the need to convert all public facing branding, including fleets, outreach, materials, ballots, business cards, etc. While these do have natural turnover, waiting to transition current supply could take many years and create confusion in branding and ultimately compromise the trust of our residents. Although the measure allows for website redirection, this only adds to the confusion as residents are redirected from our current website, the one they have checked for many years, to a new landing page that wouldn't comport to the addresses on public facing material. The result could compromise our community's trust in its local leaders and would only add to the frustration in transparent and user-focused government administration.

NATALIE ROGERS  
Mayor

Instead of mandating the use of a specific top-level domain for official correspondence, it would far more effective to mandate adherence to established, industry-standard cybersecurity best-practices within the actual systems themselves such as using strong encryption, valid certificates, and email sender security such as DMARC, DKIM and SPF. Just changing the top-level domain does not address actual cybersecurity issues that may be present within the underlying IT environment. For example, many government entities with a .gov or .ca.gov address have been subject to cybersecurity attacks in recent years, including the State's own Department of Finance. There is no certainty that this costly, time-consuming, burdensome task will result in less cyber risk to the City.

DIANNA MACDONALD  
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For these reasons, we respectfully oppose your AB 1637. Should you have any questions, please contact our legislative advocate Dane Hutchings with Renne Public Policy Group at (916) 974-9270.

Sincerely,

Natalie Rogers, Mayor