FINAL STATEMENT OF REASONS

1) The Update to the Initial Statement of Reasons

There are no changes to the initial statement of reasons, with exception to a non-
substantive change made to Section 17.00(d) to specify that the regulation is pursuant to federal requirement.

2) Imposition of Mandate on Local Agencies or School Districts

The department’s regulatory action amending Section 17.00 in Article 2.0, Chapter 1, Division 1, of Title 13, does not impose any mandate on local agencies or school districts and imposes (1) no cost or savings to any state agency, (2) no cost to any local agency or school district that is required to be reimbursed under Part 7 (commencing with Section 17500) of Division 4 of the Government Code, (3) no other discretionary cost or savings to local agencies, and (4) no cost or savings in federal funding to the state. No studies or data were relied upon to make this determination.

3) Summary of Comments Received and Department Response

The proposal was noticed on September 13, 2019, and made available to the public from September 13, 2019 through October 28, 2019. No comments were received on the proposed action.

4) Determination of Alternatives

The department has determined that no reasonable alternative considered by the department or that has otherwise been identified and brought to the attention of the department would be more effective in carrying out the purpose for which the action is proposed, or would be effective as and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law.

No other alternative would ensure compliance with the federal REAL-ID requirements. If the department is not in compliance, residents risk not being able to access federal facility or board commercial aircraft. This action is ultimately in the best interest of Californians.