

BOTS, BULK COMMENTS, AND THE BROWN ACT: Managing AI In Public Engagement



League of California Cities 2026 Annual Conference

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SEPTEMBER 23, 2026

THANK YOU FOR JOINING US TODAY



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TODAY'S CONVERSATION



What has changed?

- *How AI is affecting public participation*



What happens when it reaches City Hall?

- *Legal requirements and city operations*



What can cities do now?

- *Practical guardrails and next steps*



Audience discussion and Q&A

WHY ILG IS LEADING THIS CONVERSATION

- The Institute for Local Government was founded 70+ years ago to be the non-profit research, training and education affiliate of the League of California Cities
- We provide practical and easy-to-use resources so California's cities, counties and special districts implement policy on the ground.
- Our mission is to help local government leaders navigate complexity, increase capacity & build trust in their communities



Artificial Intelligence sits at the intersection of governance, public participation and public trust.

AI IS CHANGING PUBLIC PARTICIPATION



Residents can use AI to draft, translate and personalize public comments.



Advocacy campaigns can generate large volumes of individually worded messages in very little time.



City staff are also exploring AI to organize information, summarize input and manage growing workloads.



More comments do not always tell us what the broader community thinks.

REAL WORLD SCENARIOS



A HYPOTHETICAL SCENARIO

Based on examples we're hearing from across the state...

*A city receives **2,500 individually worded comments** in the 48 hours before a contentious council meeting.*

Most comments support the same position and staff suspect an AI-enabled advocacy campaign may be involved.

What does the city have to do, and how should it interpret the response?

HOT OFF THE PRESS!

A live example from the City of San Jose this week

More than 65 pages of public comments arrived before Tuesday's City Council meeting.

Many comments supported the same position and appeared to reflect an organized campaign.

What did you do? What did you learn?

WHAT CHANGES LEGALLY?



The city's responsibilities do not disappear because a comment may be coordinated or AI-assisted.



Privacy, confidentiality and records retention requirements still apply when staff use an AI tool.



The Brown Act and the California Public Records Act still govern the city's process and records.



City officials remain accountable for the information they rely on and the decisions they make.

Does not constitute legal advice. Consult with your attorney for official legal guidance.

TIPS & TOOLS YOU CAN USE



WHERE AI CAN HELP AND WHERE PEOPLE MUST LEAD

AI can help staff...

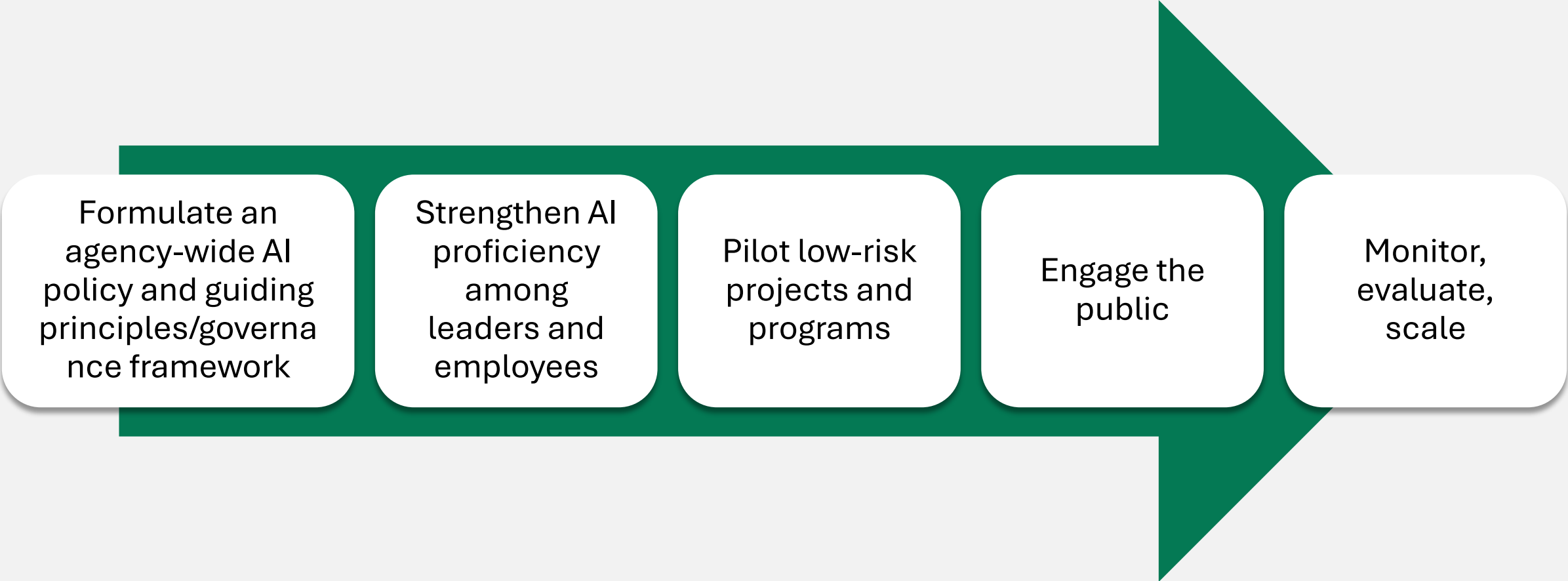
- Organize comments by topic or position
- Identify recurring themes and similar language
- Generate initial drafts and preliminary summaries
- Work through a large volume of material

People must still...

- Verify the source material and conclusions made
- Identify missing or underrepresented perspectives
- Correct errors and check assumptions
- Take responsibility for the final work

INTEGRATING AI INTO YOUR CITY

How To Get Started



Formulate an agency-wide AI policy and guiding principles/governance framework

Strengthen AI proficiency among leaders and employees

Pilot low-risk projects and programs

Engage the public

Monitor, evaluate, scale

ASSESSING PUBLIC COMMENTS IN YOUR CITY



Start with a simple task where the consequences of a mistake are low.



Use an AI tool approved by your agency and keep sensitive information out of it.



Have staff check the results against the original information.



Keep a record of what you asked AI to do and how staff reviewed its work.



Be transparent about when and how AI was used.



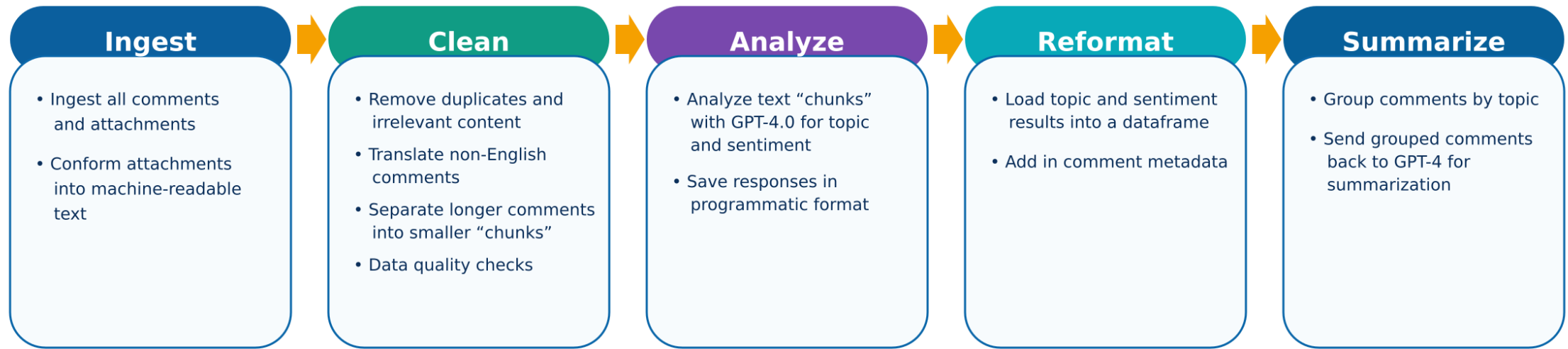
Watch for mistakes, concerns and unexpected problems.

FEDERAL GUIDANCE TO CONSIDER

Large language models for streamlined public comment review

Jane Yang, U.S. Administration for Children and Families | ai@acf.hhs.gov

The pipeline



Learn more on our GitHub repository

<https://github.com/HHS/acf-ohs-nprm-2024-18279>

Source: U.S. Administration for Children and Families



QUESTIONS & DISCUSSION



THREE TAKEAWAYS

1

AI-assisted participation is still participation.

Cities should focus on the content and process, not try to determine whether every comment is “real” or “fake.”

2

Comment volume and community representation are not the same thing.

Cities should report what they received and acknowledge the perspectives that may still be missing.

3

AI can support the work, but people are still accountable.

Human review, transparency and sound judgment are more essential than ever.

Public participation is already complex. AI just adds another layer.

AI RESOURCES FOR CITIES

**AI Policy
template
from GovAI
Coalition**



**San Jose's
Generative
AI
Guidelines**



**SJSU's AI
Upskill
Program**



**Community
Engagement
Handbook
from GovAI
Coalition**



**AI
Governance
Checklist for
Elected
Officials
from GovAI
Coalition**



AI RESOURCES FOR CITIES

**The Municipal Research and Services
Center:**

**Artificial Intelligence Policies and
Resources for Local Governments:**



Government AI Coalition



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policy considerations and tools
for responsible AI in government.



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