

# AI and Public Comment: Hopes, Concerns, & Current Uses



Image: Wes Tingey

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The complex block contains three logos. On the left is the 'Smith Fellows' logo, featuring the text 'Smith Fellows' in a script font next to three green leaves. In the center is the 'Oregon State University' logo, which includes the university's crest and the text 'Oregon State University'. On the right is the 'HUMAN DIMENSIONS LAB' logo, which features a stylized human figure with a tree-like head, the text 'HUMAN DIMENSIONS LAB', and 'DEPT. OF FISHERIES, WILDLIFE, AND CONSERVATION SCIENCES' below it.

Public comments are required in environmental rulemaking

Each year...

**1000s** of rules written

**Millions** of comments received

# Today's talk is based on



26 semi-structured  
interviews



State & Federal Agencies  
(OR = 4; WA = 4; Fed = 3)

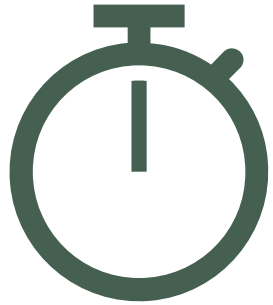
A word cloud centered around the word "Frustrated". The word "Frustrated" is the largest and most prominent, written in a bold, red, sans-serif font. Surrounding it are numerous other words in various sizes, colors, and orientations. The colors used include red, yellow, green, blue, and black. The words are arranged in a roughly circular pattern around the central word. Some words are repeated, such as "Frustrated" and "Overwhelmed". The overall composition is dense and visually busy, representing a wide range of emotions and states of mind.

**Frustrated**

Amused ("funny")  
"Accountable"  
Stressed Surprised Relieved  
Excited Proud Fulfilled Discouraged Interested Concerned  
"Worn down" Anxious Worried Thankful Resentful Bad Intimidated Hard  
Pissed off Infuriated  
Optimistic Afraid Exasperated  
Delighted Unsatisfied  
Exhausted Satisfied Drained Happy Amazed Personal Brutal  
Grateful Guilty Inadequate Disheartened Good  
Positive Nervous Curious Accomplished Awful  
Annoyed Gratified "Comraderie building" (Connected)  
Overwhelmed

“It's a little **like Christmas day**. The very first time you get [a comment], you're just so excited for it, and then the longer you've been in it, it's **like a really big family gathering** where you've got that weird uncle and you got that cousin. For me, it is exciting, it's nerve-wracking, sometimes it is frustrating, disheartening, but also gratifying. There's a whole range of emotions that come along with this process.”

# Agency staff hope AI will help...



Save time



Reduce  
errors & bias



Better consider  
public perspectives

# They have 4 types of concerns about AI...

Ethical

Protecting personally identifiable information

Environmental impact

# They have 4 types of concerns about AI...

Ethical

(In)accuracy

Technical

Loss of nuance and context

Inconsistent/changing output

Time to verify output

Lack of transparency (what did it do?)

“We want to be accurate in what people have said. That we're capturing it correctly ... So that's the biggest thing. Is it accurate and what effort is needed to verify the product?” - I16

# They have 4 types of concerns about AI...

Ethical

A big process change

Technical

Learning to prompt takes time

Implementation

Lacking agency guidance on AI use

Will the public be okay with government using AI?

# They have 4 types of concerns about AI...

Ethical

Won't be helpful / save time

Technical

Expectation to do more work, not better work

Implementation

Legal liability

Professional

Retaining accountability

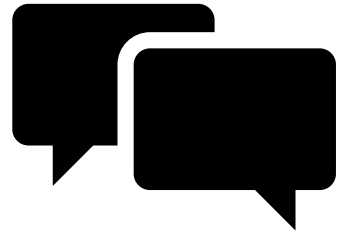
Valuing efficiency over relationships

Deskilling (writing, critical thinking)

Communicates staff are replaceable

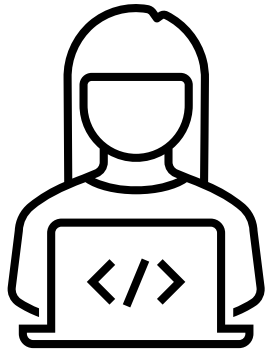
Fear of job loss

# Uses of AI in Public Comment



## Exploring with chatbots

- Drop in comments, ask for summary or themes
- Compare results of manual and AI analysis



## Comment software feature

- AI summary of submissions
- Auto-detect sentiment

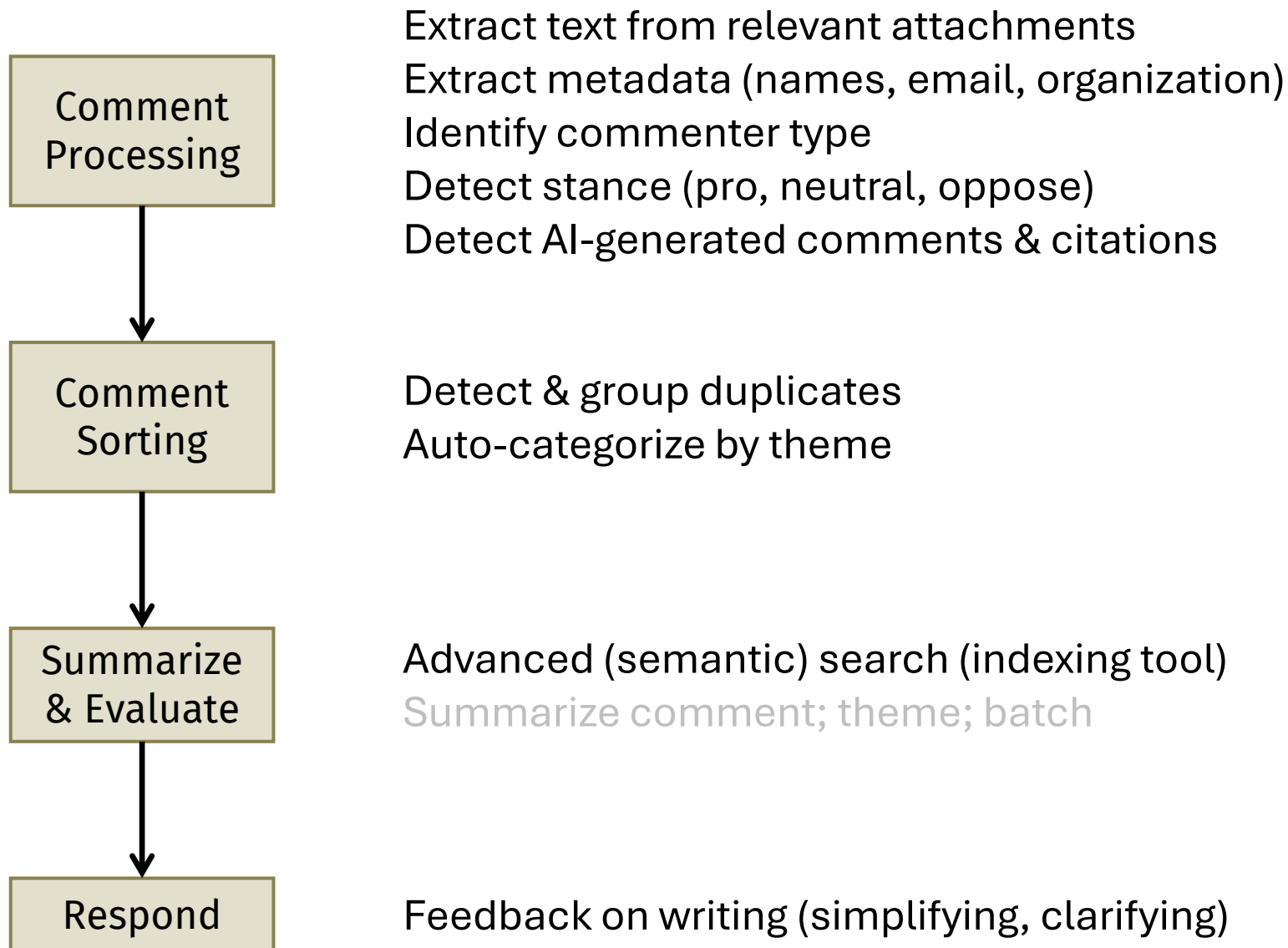
# Three kinds of chatbot summaries

**By Batch.** E.g., What did eNGOs say? How does this vary?

**By Topic.** What is said about erosion?

**Meeting prep.** What were their main points again? Where should I re-read?

“I want to be clear about this. I don't use AI to read the letters and tell me what's in them. I use it as kind of like an indexing tool, if you will, that tells me if you're looking for this, this is where to go find it.”





# Looking through a public service lens

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*Does it help us better serve the public?*

“When you're in the weeds or worn down after 1.3 million comments, you can lose sight of just how essential this process is [...] **we don't do it just because we're required to. We do it so that we end up with something that's better in the end.**”

“When we're in the business of working with people's concerns and feelings that impact their everyday life or their business or their community, I'm not really eager or interested in giving up my human interaction with that to save work time.”

“I think **our staff would be offended** if [AI] was offered as an option. I think that that would not be viewed as an efficiency, but it would be looked at as your work is replaceable. **Your expertise is replaceable** ... what's the point of integrating these things when we are hiring PhDs in quantitative and qualitative analysis who are brilliant? I don't want to sound flippant, but **what can AI do better** than what these folks are doing?”

“There's just **not enough time**. These [rules] tend to be **really important** and feeling confident that **you are doing justice** to what it is that the people who are commenting are telling you, that's definitely the thing that really drives me. And this is why I like AI is because I think **I can do so much better with AI than I can do without it**. And I'm not relying on it to tell me this is what's there. I'm **relying on it to tell me this is where to look.**”

“I feel like **there's a big opportunity** here to make improvements that **help people, help staff, and also help better serve the public**. So, I'm excited to see where this conversation goes.”



# Let's start a conversation

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