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July 28, 2026

The Honorable Sabrina Cervantes
Chair, Senate Appropriations Committee
1021 O Street, Suite 7330
Sacramento, CA 95814

RE: AB 2656 (Petrie-Norris), Public employee notice for AI services – OPPOSE

Dear Senator Cervantes,

I am writing on behalf of the Kern County Board of Supervisors, in lockstep with CSAC, UCC, RCRC and a broader coalition, to express our opposition to AB 2656 (Petrie-Norris), which will require local agencies to provide a recognized employee organization no less than 45 days' written notice before taking an action to develop, purchase, or require the use of any generative artificial intelligence (AI) to perform a service that is within the scope of work of the job classification represented by the recognized employee organization.

Like much of the public sector, local agencies are cautiously testing the use of artificial intelligence tools in day-to-day operations. Tools that promise to streamline routine activities (like the notetaking tools included in virtual meeting software such as Zoom and Teams) allow our employees to focus their time and attention on the most important components of serving the public. Often, these tools are routine elements of daily office life, like ChatGPT and Microsoft Copilot, and such tools are frequently included in off-the-shelf software ubiquitous in the modern office environment.

When tools become available that assist with specific aspects of public service (like charting in a health clinic or monitoring drinking water safety), they are often vetted in partnership with employees with the mutual goals of ensuring staff is empowered to focus on certain aspects of their work and providing more efficient and effective outcomes that benefit the public. We fail to see the benefit of imposing delays on routine purchases of tools that are simply available for employees to use.

It is not clear how local agencies should interpret the notice requirements before they may develop an AI tool. When does development truly begin? When does it end? How could this requirement apply to training of an AI tool? How will the "taking an action" trigger be interpreted? It is unclear how these agencies should interpret these provisions of the law, which could lead to overreporting and delays.

Importantly, local agencies remain subject to the statutory provisions of the Meyers-Milias-Brown Act (MMBA) and Ralph C. Dills Act, which require local agencies to meet and confer with recognized employee organizations regarding changes to employees' wages, hours, or terms and conditions of employment. Existing law provides a robust framework for determining when particular uses of generative AI may actually have a significant and adverse effect on the employment relationship, in which case notification (and more) is already required. This bill is therefore both redundant and unnecessary.

Finally, non-education local agencies are subject to last year's AB 339 (Chapter 687, Statutes of 2025), which requires additional notice to recognized employee organizations regarding a range of local agency contracting activities, even when those activities do not rise to the level of triggering meet-and-confer obligations under the MMBA's usual standards. This additional notification requirement has been incredibly burdensome for local agencies and has required a significant amount of time, legal resources, and training to implement. Adding further unworkable provisions under this bill would exacerbate these concerns and represent another state mandate for which the state may be obligated to provide reimbursement under Article XIII B of the California Constitution.

For these reasons, the Kern County Board of Supervisors opposes this measure and respectfully urges you to vote **NO on AB 2656**.

Sincerely,

A handwritten signature in blue ink, appearing to read "Phillip Peters", with a stylized flourish at the end.

Phillip Peters, Chairman
Kern County Board of Supervisors

cc: Honorable Members, Senate Committee on Appropriations
Honorable Members, Kern Legislative Delegation
Shaw Yoder Antwih Schmelzer & Lange