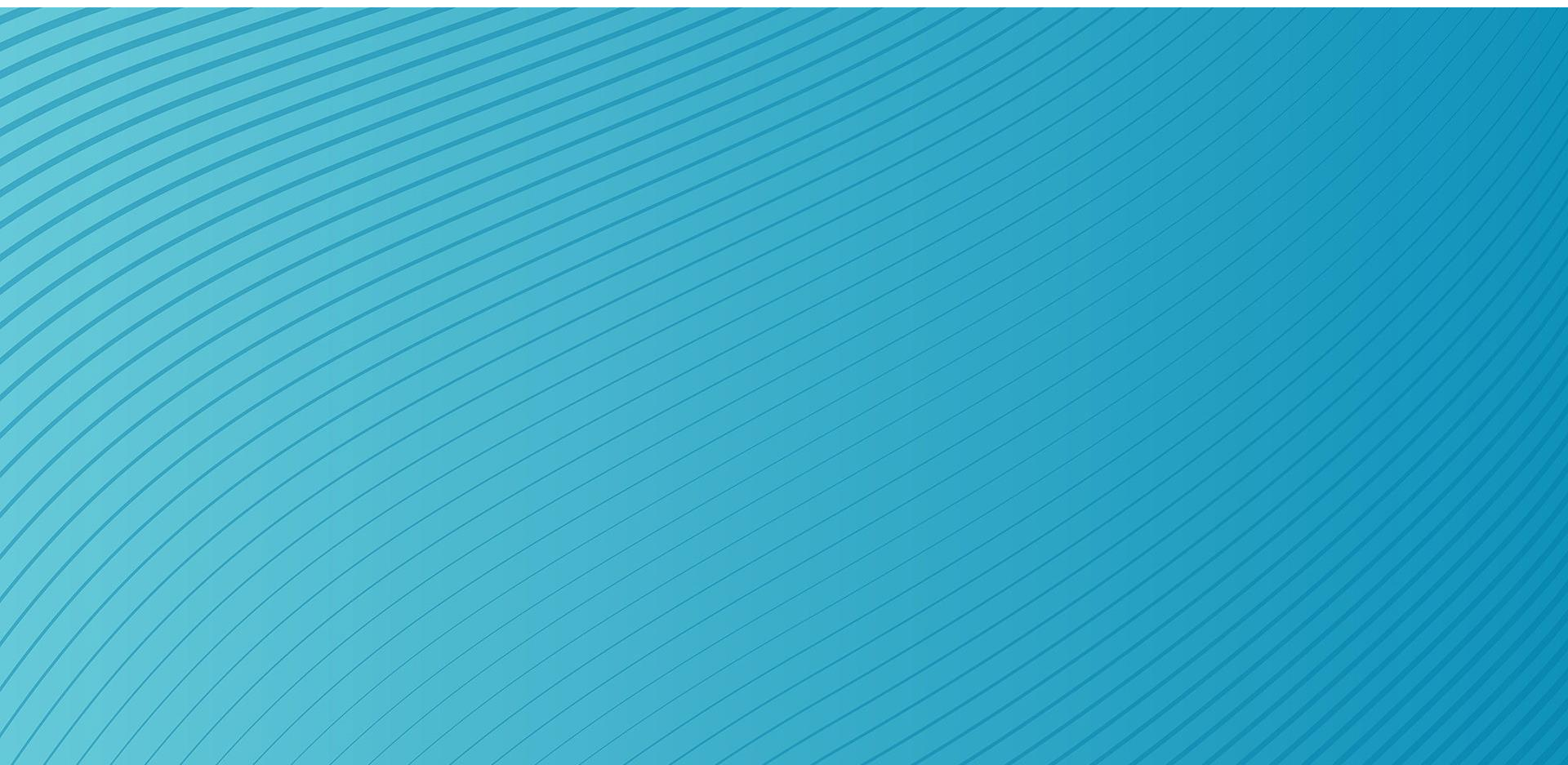


May 14<sup>th</sup> 2026



# Beyond the hype: the dark side of AI

By Lauren Schramm



# Reality: AI Is Already in the Workflow

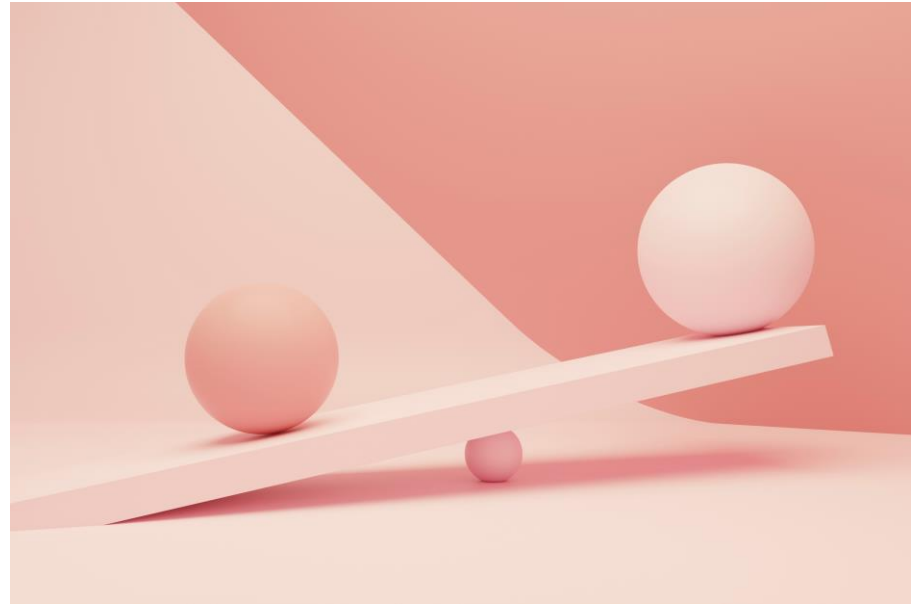


- Rapid adoption across firms and agencies
- Limited oversight or standardization

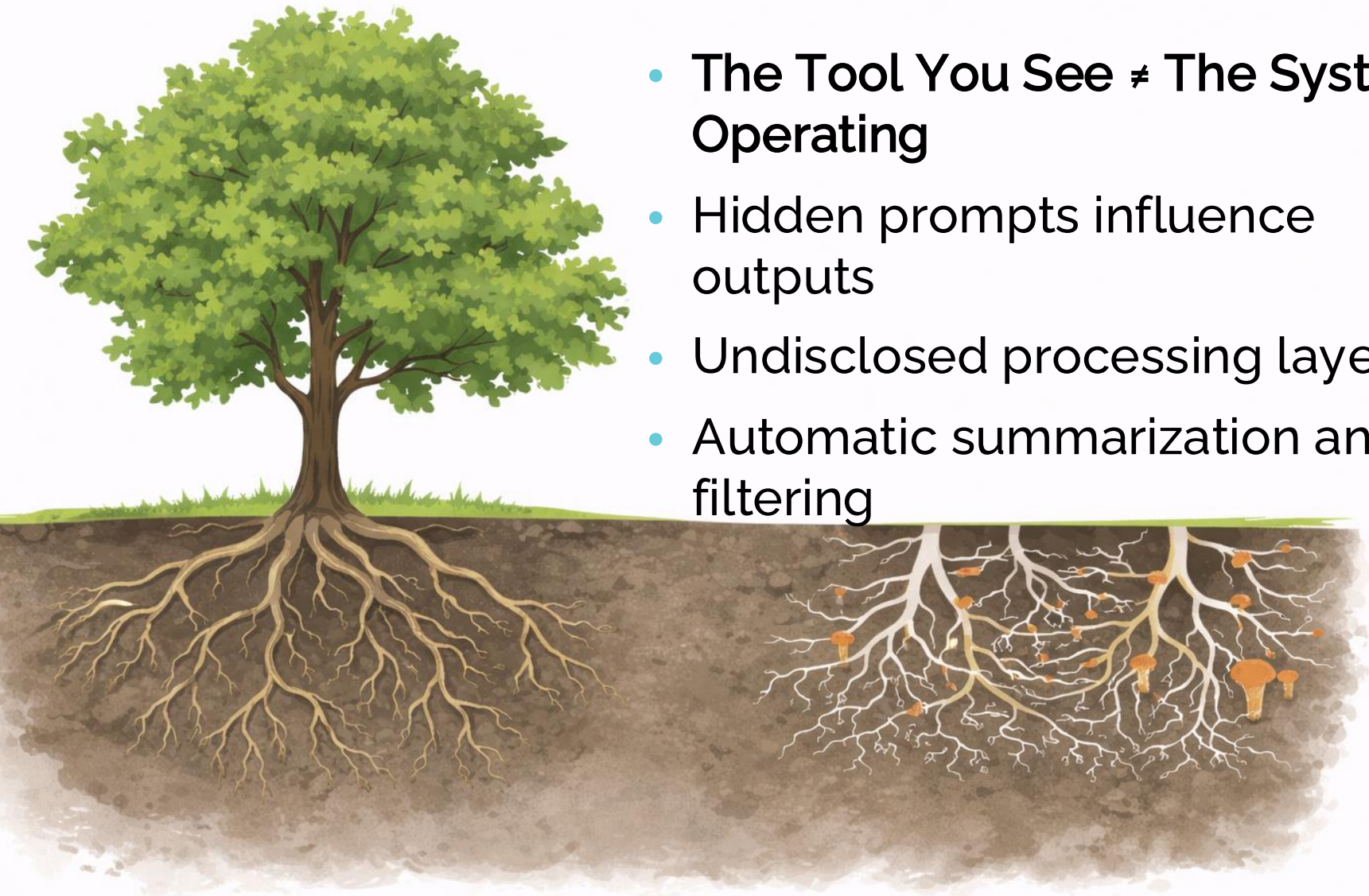
**AND  
AI Adoption Is Outpacing  
Oversight**

# AI Is Not Free

- **Hidden Environmental Costs**
- High energy demand
- Water consumption
- Infrastructure expansion



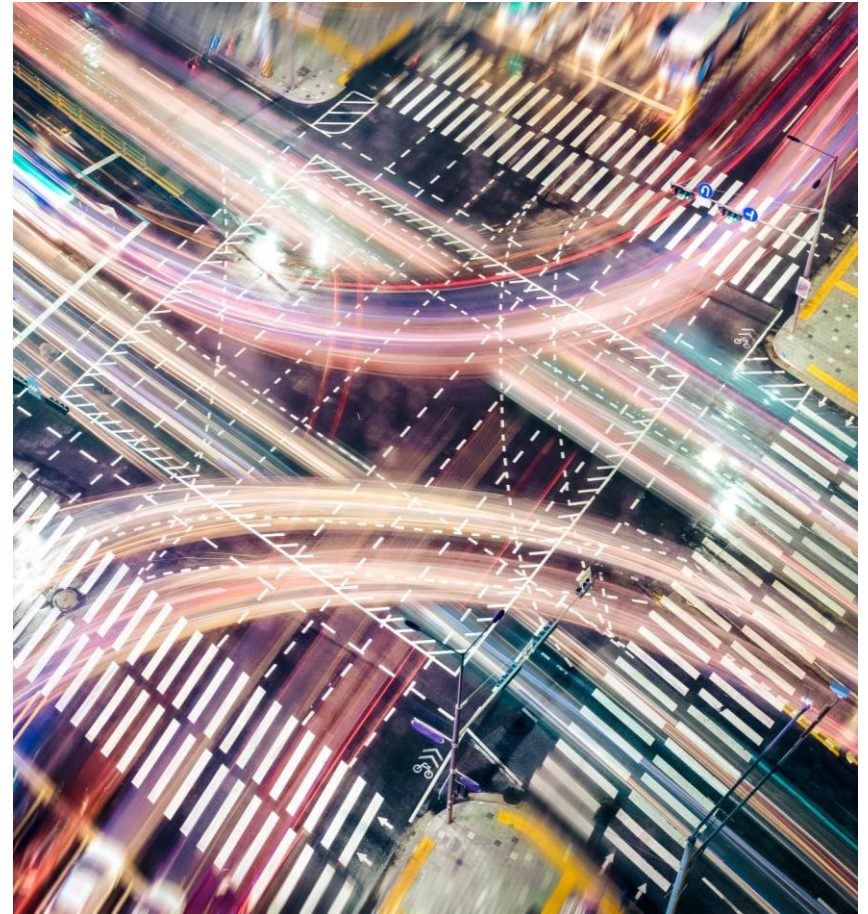
# Hidden System Behavior



- **The Tool You See  $\neq$  The System Operating**
- Hidden prompts influence outputs
- Undisclosed processing layers
- Automatic summarization and filtering

# The Core Tension; Efficiency vs. Defensibility

- Faster production
- Lower costs
- Increased throughput
- But:
  - Reduced transparency
  - Higher risk of error
  - Greater legal exposure
- Efficiency gains do not automatically produce better decisions.



# Critical Distinction; AI Produces Language— Not Judgment

- Pattern-based outputs
- No field validation
- No accountability
- A complete sentence is not a complete analysis.

Looks right  $\neq$  is right



# What Is “AI Slop”?

- Low-effort, AI-generated content that looks polished but lacks accuracy, context, or expertise
- May not be intentional- Claude code leak

**Wetland resources are an important part of the environment because they are very important for the environment.** Wetlands provide many benefits, such as water quality, wildlife habitat, and recreation, which are very important to the natural balance of the ecosystem. The proposed project will have some impacts on wetlands, but mitigation will make them less impactful. In conclusion, wetlands are very important and must be protected in accordance with federal, state, and local laws and regulations that apply to wetlands in this area.

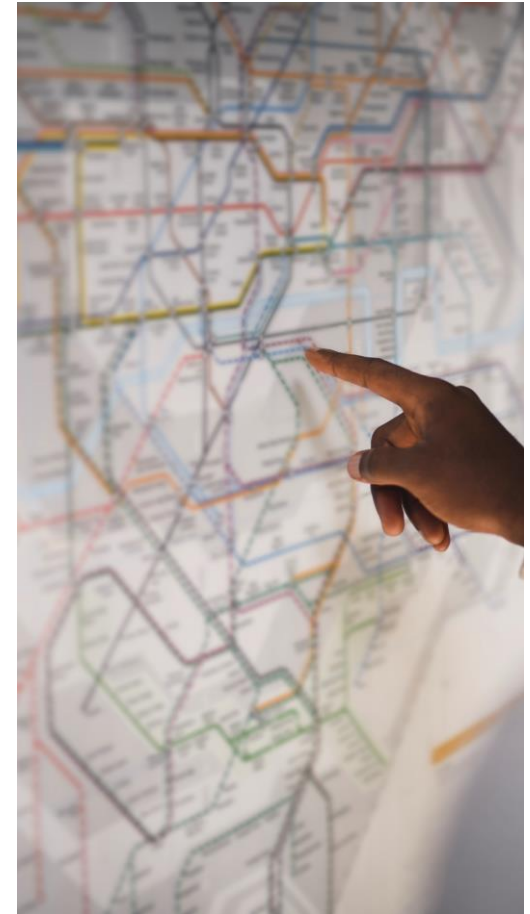
# Slop is already out there

- Agencies Are Receiving AI-Generated Documents
- Reports contain:
  - Fabricated citations
  - Incorrect regulatory references
  - Generic, non-site-specific content
- This is not hypothetical—it is already in review pipelines.



# Public Trust at Risk

- **NEPA Relies on Credibility**
  - Transparency
  - Traceability
  - Accountability
- AI introduces:
  - unclear authorship
  - unverifiable summaries
- Loss of trust undermines the entire process



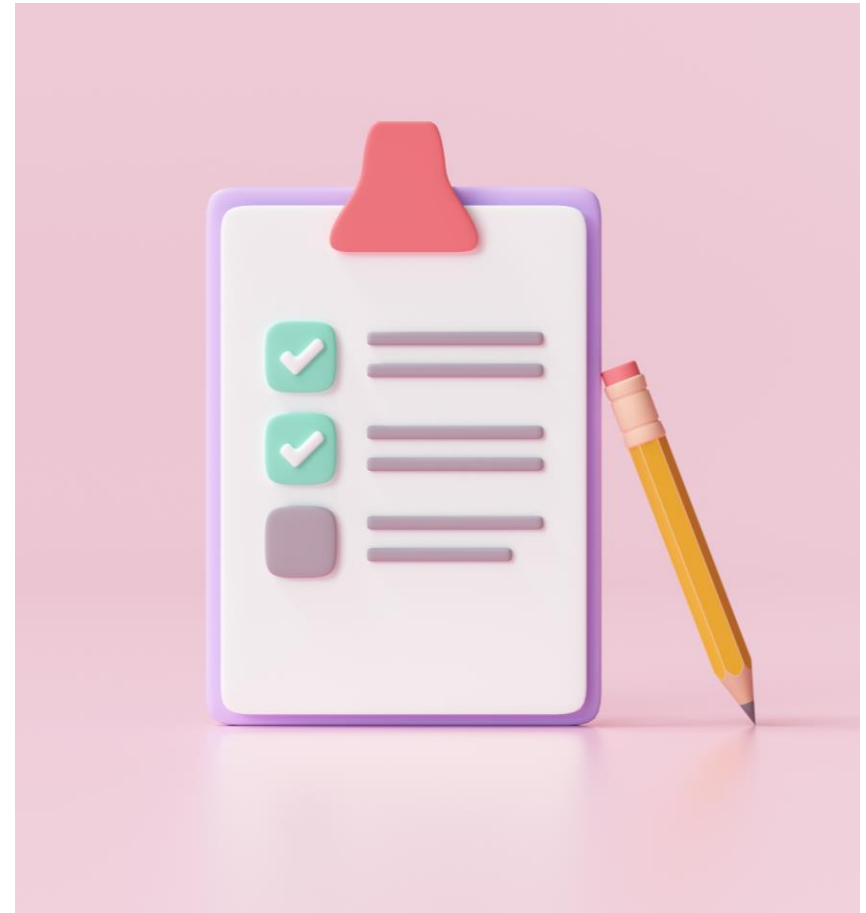
# Introducing a New Dynamic; AI Is Now a Stress-Testing Tool



- Tools like **Claude Mythos Preview** can:
  - Identify inconsistencies
  - Detect weak reasoning
  - Surface edge cases at scale
- AI is not just generating documents—it is evaluating them.

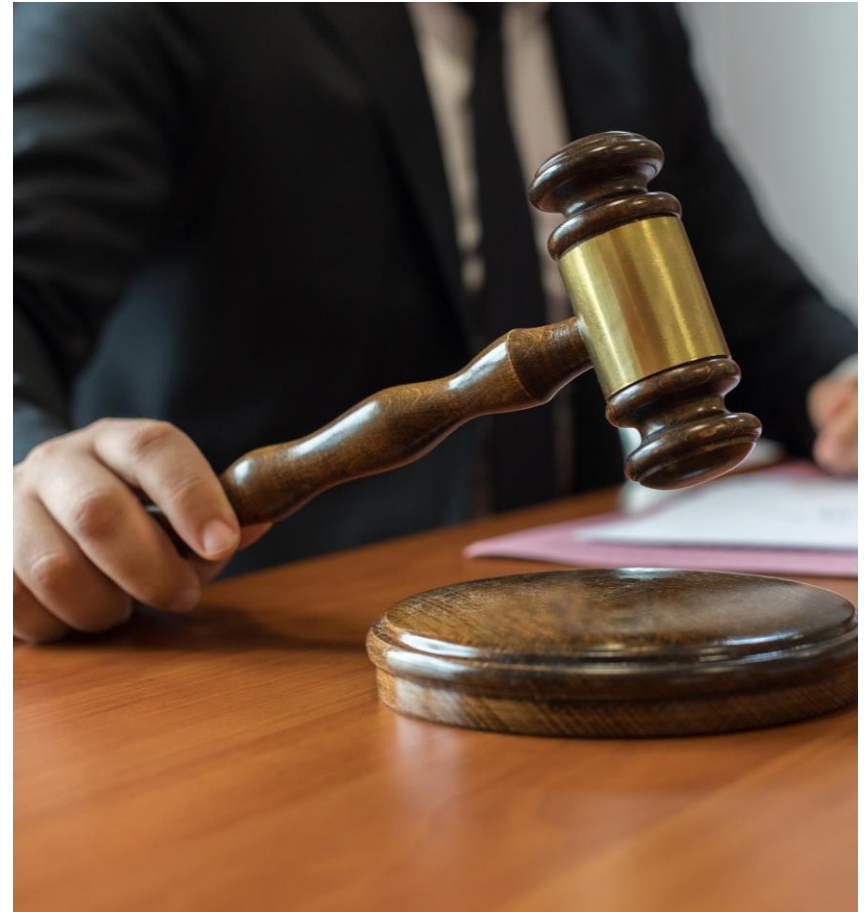
# What Mythos-Type Tools Do

- **System-Level Interrogation**
- **Consistency Analysis**
  - Cross-section contradictions
  - Misaligned assumptions
- **Legal Stress Testing**
  - Flags “arbitrary and capricious” risks
  - Identifies unsupported conclusions
- **Scale Processing**
  - Reviews full administrative records
  - Analyzes large volumes of public comments



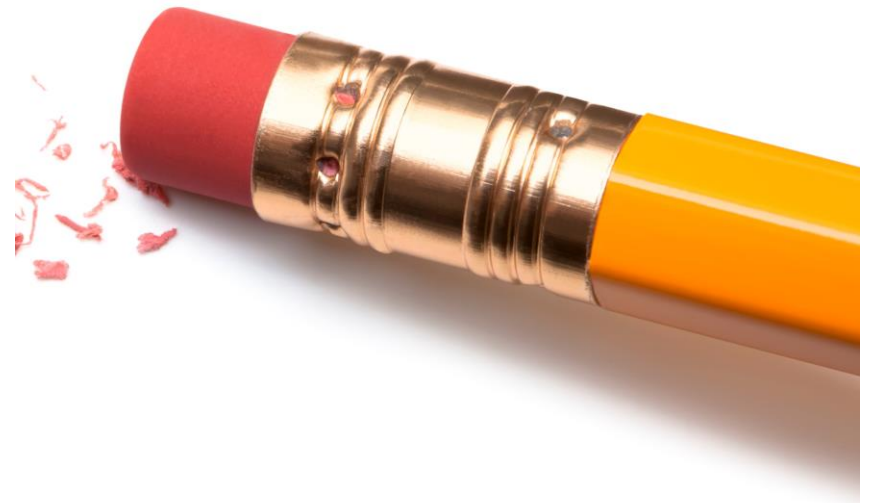
# The Standard Is Rising

- **Defensibility Is Being Redefined**
- Inconsistencies are easier to detect
- Weak logic is easier to expose
- Review is more systematic
- The administrative record can be interrogated
- Faster path to litigation



# A New Workflow Model

- From Drafting → Continuous Validation
- Old:
  - Draft → Review → Publish
- Emerging:
  - Draft → Validate → Stress test → Revise
- Work is continuously tested, not just produced.



## A Deeper Problem Who Is Building These Systems?

- Developed primarily by technology companies
- Limited involvement from:
  - NEPA practitioners
  - Environmental planners
  - Regulatory experts
- Tools are being designed without understanding problems



# Why That Matters

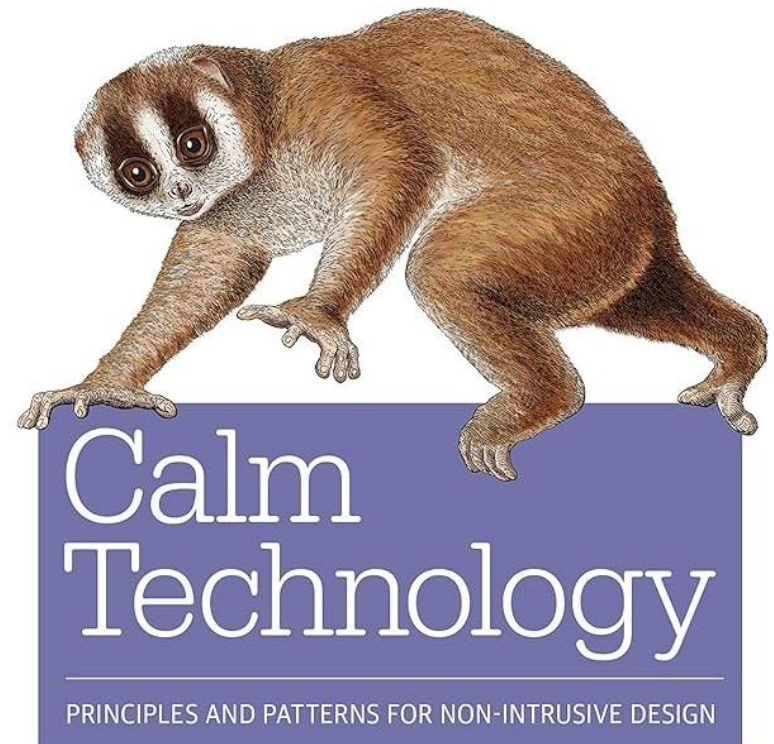
## Mismatch Between AI and NEPA



- AI assumes:
  - Transferable patterns
  - Generalizable logic
- NEPA requires:
  - Site-specific analysis
  - Procedural rigor
  - Legal defensibility
- Environmental review is not a pattern-recognition problem.

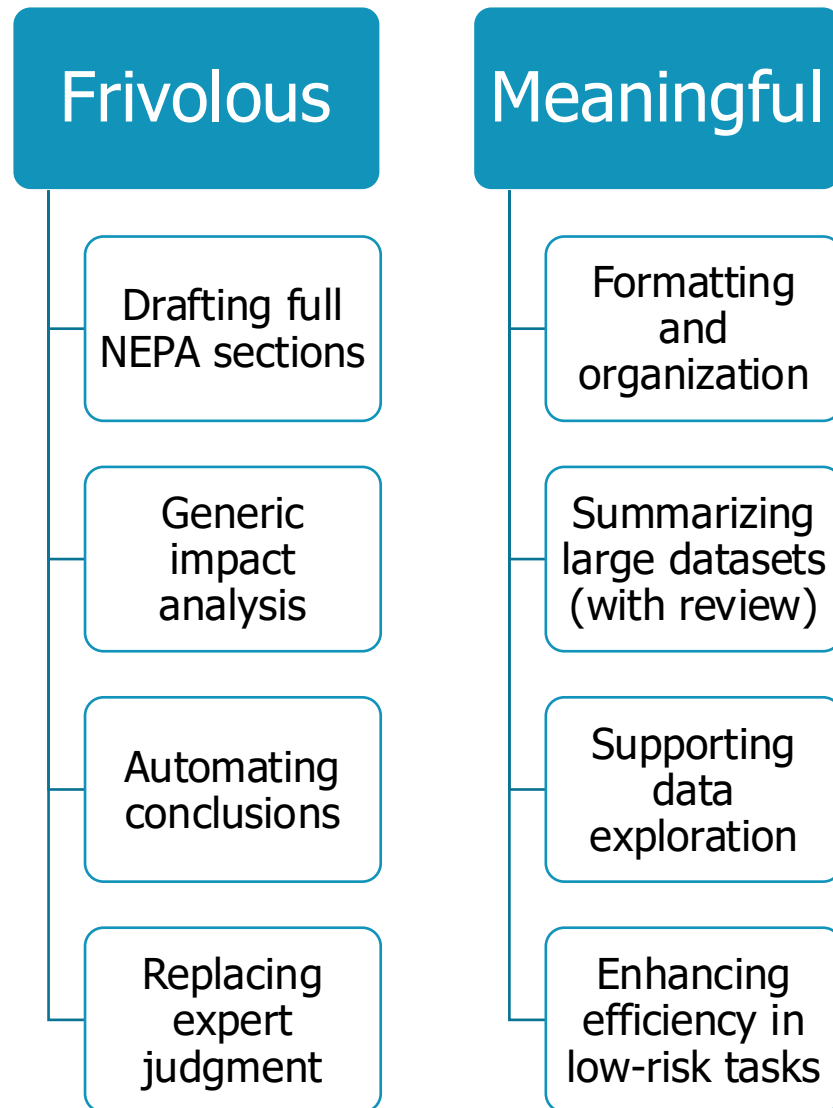
# What Responsible AI Would Look Like

- **Applying Calm Principles to NEPA**
  - Flags uncertainty clearly
  - Shows sources and assumptions
  - Requires human validation
  - Limits use in high-risk decisions
- AI should support judgment—not simulate it.



# Practical Framework

- **AI Use Triage**
- **Before using AI:**
  - Is it necessary?
  - Is it proportional?
  - Is it transparent?
  - Is it reviewable?



## Decision Threshold If You Cannot...

- Explain how output was generated
- Verify sources independently
- Defend it in a public record
- Then:
- **Do not use it.**

“As an Environmental Professional I will: 1. be personally responsible for the validity of all data collected, analyses performed, or plans developed by me or under my direction. ”  
-NAEP code of ethics

# The Strategic Shift

## The Role of the Practitioner Is Changing



- Less:
  - Drafting narrative
- More:
  - Validating assumptions
  - Stress-testing analysis
  - Detecting errors and inconsistencies
- The role shifts from producer to evaluator and defender.

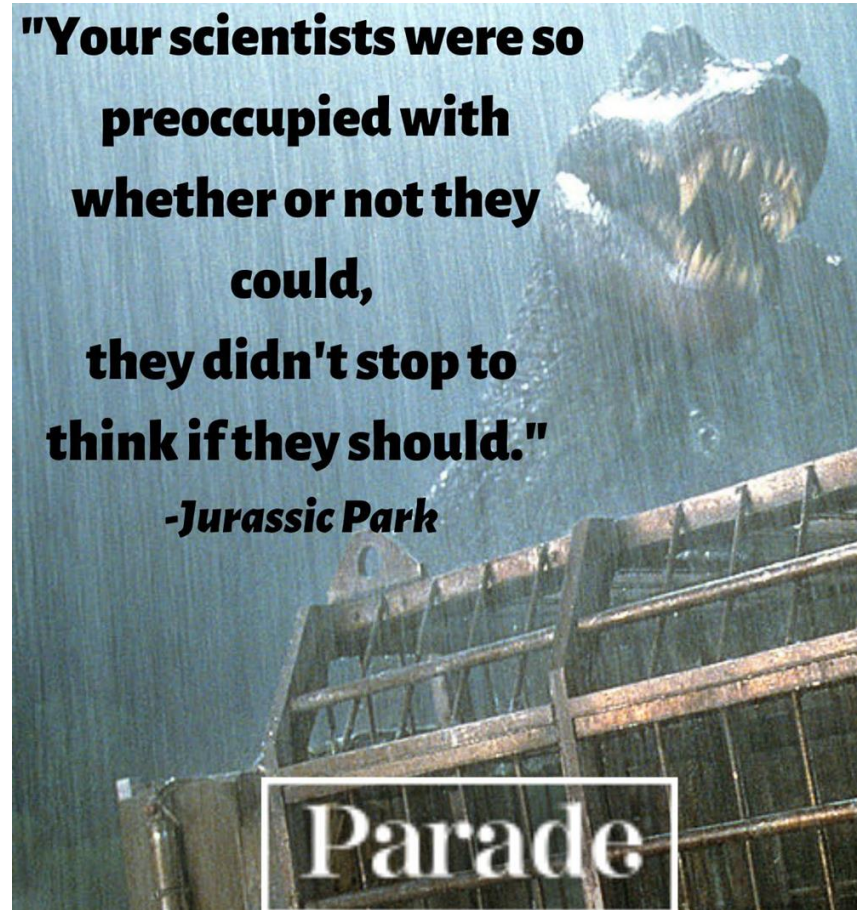
IN ANY SITUATION, THE  
BEST THING YOU CAN DO  
IS THE RIGHT THING; THE  
NEXT BEST THING YOU  
CAN DO IS THE WRONG  
THING; THE WORST  
THING YOU CAN DO IS  
NOTHING.

THEODORE ROOSEVELT

QUOTES<sup>E</sup>VERLASTING.COM

# Closing

- **Just Because**
  - AI is powerful
  - AI is useful
  - AI is already here
- Can we justify its use when it matters?





# Questions?

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