ATTENTION

The City Council meeting will be held in a hybrid format that may include both in-person AND virtual attendance via Zoom. Unless they have cause to appear virtually, Councilmembers will attend the meeting in person in Council Chambers, fifth floor of City Hall, 316 N. 26th Street. In order to honor the Right of Participation and the Right to Know in Article II, Sections 8 and 9, of the Montana Constitution, the City of Billings and City Council are making every effort to meet the requirements of the open meeting laws.

Citizens are invited to:

- Review the Agenda Packet on the City's website at: www.billingsmt.gov and click on "Your Government," "City Council," and "Agendas & Minutes".
- View the meeting:
  - On Community 7 TV - Channel 7 or Channel 507 -- Spectrum Cable. *(On evenings when there is a conflict with School District No. 2 Board meetings, the City Council meeting will be broadcast on Channel 8 - Spectrum Cable.)* Channel 7 or Channel 978 - TDS Fiber.
  - Online at www.comm7tv.com and click on the "Watch Live" icon. Community 7 also has links to their Facebook page and YouTube channel.
  - On the City's website at www.billingsmt.gov and click on "Watch Meetings Online" on the homepage.
  - In-Person.

Citizens may submit public comment via the following methods:

- Mail: City Clerk, P.O. Box 1178, Billings, MT 59103
- Email: Council@billingsmt.gov.
  - Emails received after 3:00 PM on the day of the meeting, may be posted on the Council's webpage the following day for public viewing.
- Attend the meeting in person

Please contact Denise Bohlman, City Clerk, at bohlmand@billingsmt.gov, or at 406.657.8210, with any questions.

CITY OF Billings

VISION STATEMENT:
"Leading the Big Sky,
boldly inspiring opportunities
for our community."

WORK SESSION AGENDA

COUNCIL CHAMBERS **NOVEMBER 16, 2026** **5:30 P.M.**

CALL TO ORDER: Mayor Nelson

PUBLIC COMMENT ON ALL ITEMS. This time is set aside for the public to speak to the City Council. Councilmembers will listen but will not respond, ask questions, or discuss comments during this time. Questions or concerns needing a response should be directed to City staff after the meeting. You may only speak once for each item during the meeting.

Please note, the City Council cannot take action on any item of significant interest to the public that does not appear on the agenda. Comments are limited to three (3) minutes during each public comment period ***or*** as set by the Mayor. Speaker sign-in required. Please fill out the public comment form available at the back of Council chambers. This will allow the Mayor to recognize you before you address the Council.

1. **2028 Long Range Transportation Plan Update.**

   -Public Comment

2. **Police Technology Modernization Update and Records Management Upgrade Proposal.**

   -Public Comment

3. **Email Access Policy.**

   -Public Comment

HIGHLIGHT UPCOMING AGENDA ITEMS OF COUNCIL INTEREST:

COUNCIL DISCUSSION:

PUBLIC COMMENT on "NON-AGENDA ITEMS". This time is set aside for the public to speak to the City Council. Councilmembers will listen but will not respond, ask questions, or discuss comments during this time. Questions or concerns needing a response should be directed to City staff after the meeting. You may only speak once for each item during the meeting.

Please note, the City Council cannot take action on any item of significant interest to the public that does not appear on the agenda. Comments are limited to three (3) minutes during each public comment period ***or*** as set by the Mayor. Speaker sign-in required. Please fill out the public comment form available at the back of Council chambers. This will allow the Mayor to recognize you before you address the Council.

ADJOURN:

Note:

- This meeting is an "informal" meeting of the City Council. The content of the Agenda is subject to change at the meeting.
- In the event there is a closed executive session to discuss litigation strategy, the other parties to the case(s) discussed are not public bodies or associations as described in Section 2-3-203(1) and (2), MCA. The meeting is closed, as allowed by Section 2-3-203(4)(a), MCA, "to discuss a strategy to be followed with respect to litigation when an open meeting would have a detrimental effect on the litigating position" of the City of Billings. In the event there is a closed executive session to discuss a matter related to an individual's privacy, the presiding officer must determine the demands of individual privacy exceed the merits of public disclosure and the individual has not waived their right to privacy.

City Council Work Session **1.**
Meeting Date: 11/16/2026
TITLE: Kickoff of the 2028 Long Range Transportation Plan Update
PRESENTED BY: Lora Mattox
Department: Planning & Community Services
Presentation: Yes
Legal Review: No
Project Number: N/A

RECOMMENDATION

Staff recommends the City Council receive the kickoff presentation and provide early direction on the transportation issues, growth considerations and investment priorities that staff should evaluate in the 2028 Long Range Transportation Plan (LRTP) Update. Staff recommends treating this kickoff as an informational discussion. Approval of specific projects or adoption of the plan will occur later in the 2028 LRTP update process.

Staff is also seeking Mayor and/or City Council member participation on the LRTP Steering Committee to provide ongoing input and help guide development of the plan throughout the process. MPO staff anticipates the Steering Committee to meet approximately once a month during the estimated 18-month-long process. Staff would like the Mayor and Council to designate one or two of their members to serve on the LRTP Steering Committee.

EXECUTIVE SUMMARY

The Billings Metropolitan Planning Organization (MPO) is beginning the 2028 Long Range Transportation Plan (LRTP) Update, which will guide regional transportation planning and investment for at least the next 20 years. The update will evaluate current and future transportation needs, anticipated growth, potential improvements and available funding for roadways, transit, freight, walking and bicycling.

The process will include technical analysis, travel demand modeling, public and stakeholder engagement, and governing-body input, with adoption anticipated in May/June 2028. This kickoff requests early direction on transportation issues, growth considerations and investment priorities; no specific projects or construction funding are being presented at this stage.

The current adopted Billings MPO LRTP can be viewed here: https://billingsmt.gov/3262

BACKGROUND (Consistency with Adopted Plans and Policies, if applicable)

The LRTP provides the regional framework for transportation planning and investment over a horizon of at least 20 years. It addresses roadways, transit, freight, walking and bicycling within the Billings metropolitan planning area. Billings updates the plan every five years per Federal Highway Administration requirements to reflect changing conditions, anticipated growth and available resources.

The 2028 update will build on the 2023 LRTP and the amendments PCC adopted in March 2026 that refined the project list, improved fiscal constraint, updated the planning area and introduced interactive project mapping. The update will help identify transportation needs, evaluate potential solutions and establish a financially responsible roadmap for future investment. LRTP priorities inform the Transportation Improvement Program, local Capital Improvement Programs and the Statewide Transportation Improvement Program. Project advancement also requires funding and implementation decisions.

Proposed Scope of Work

Staff will assess existing transportation conditions, review growth and land-use assumptions, identify system needs and evaluate possible improvements. Analysis will draw on crash data, traffic counts, transit and freight information, bicycle and pedestrian data, Billings 2045 and associated neighborhood plans, community input and funding forecasts.

The MPO will update its TransCAD travel demand model with current roadway, population, employment and land-use information. Calibration and validation will help assess model performance against observed conditions. Future scenarios will help evaluate how growth and potential transportation improvements could affect travel patterns and nearby corridors.

Five proposed goal areas will guide development of objectives, performance measures and targets:

- Safety

- Resiliency
- Mobility
- Accessibility and Transportation Options
- Economic Vitality

Staff will seek input on these goals and the project evaluation approach during plan development.

Project Evaluation and Funding
Potential evaluation areas include safety, mobility, multimodal connectivity, growth and land use, accessibility, economic development and freight, resiliency, public input, cost and funding feasibility. Staff will seek policy input before finalizing criteria or weighting. Technical findings will inform governing-body decisions about priorities and tradeoffs.

The project list will distinguish committed projects in current programs, recommended improvements within reasonably anticipated resources, and illustrative improvements that need additional funding. An identified need or inclusion in the LRTP does not guarantee project funding. Planning expenditures will be addressed through the MPO work program and applicable budget and contracting processes.

Engagement and Governing Body Participation
Proposed engagement methods include an interactive map, community survey, events, stakeholder meetings and agency coordination. Staff will report what participants identified and how their input informed the plan. Governing-body discussions will occur at key stages to review needs, possible solutions, investment priorities and the draft plan before final consideration through the MPO process.

Anticipated Schedule

Period	Primary activities
Fall 2026	**Kickoff and early outreach**
2027	**Existing conditions, model update and needs analysis**
Late 2027	**Alternatives and project evaluation**
Early 2028	**Recommendations and financial analysis**
Spring 2028	**Draft plan and public review**
May/June 2028	**Target adoption**

Activities may overlap, and the schedule may be refined as work progresses.

Requested Governing Body Input
Staff seeks direction on regional issues such as corridor safety, major network connections, access to growing areas, system preservation, transit access, non-motorized access and connectivity, and freight movement. These examples are topics for evaluation, rather than predetermined project recommendations.

Discussion questions include:

- What transportation issues should this plan make sure we address?
- Where do you see the Billings area changing most over the next 20 years?
- What information would help you make future transportation investment decisions?

FISCAL EFFECTS
The kickoff requests no additional appropriation or commitment of funding to complete. Anticipated planning costs include MPO staff time, consultant assistance for the travel demand model and technical analysis, data collection, and public engagement. Staff is using federal metropolitan planning (PL) funds as programmed through the current PCC approved Unified Planning Work Program (UPWP).

STAKEHOLDERS
Anticipated agency stakeholders include City and County Public Works and planning staff, MDT, MET Transit, Billings Airport, FHWA and FTA. These partners will help coordinate transportation data, growth assumptions, project needs, funding information and implementation responsibilities. Governing bodies and MPO committees will provide policy direction and review findings and recommendations.

Community stakeholders include residents throughout the planning area, neighborhood groups, schools and colleges, employers, businesses, freight operators, emergency services, and bicycle and pedestrian interests. Outreach will include transit riders, people with disabilities, older adults, students and residents who do not drive, so the plan reflects different transportation needs and barriers.

Proposed engagement methods include an interactive map, community survey, events, stakeholder meetings and agency coordination. Staff will report what participants identified and how their input informed the plan. Governing-body discussions will occur at key stages to review needs, possible solutions, investment priorities and the draft plan before final consideration through the MPO process.

ALTERNATIVES
N/A

City Council Work Session **2.**
Meeting Date: 11/16/2026
TITLE: Police Technology Modernization Update and Records Management Upgrade Proposal
PRESENTED BY: Brandon Wooley, Captain of Operations
Department: Police
Presentation: Yes
Legal Review: No
Project Number: N/A

RECOMMENDATION
Informational with no formal action requested.

EXECUTIVE SUMMARY
The Police Department will present two public-safety technology initiatives. The first is an implementation progress update on the Axon technology program, which is nearing completion. The presentation will highlight implementation milestones, technology deployment, operational integration, and realized organizational benefits.

The second is a proposed modernization of the Police Records Management System (RMS), transitioning from the existing on-premises platform to a cloud-based solution. The proposed acquisition would utilize a cooperative purchasing agreement and provide enhanced compliance reporting, workflow automation, workload and case management, expanded data analytics, and additional investigative capabilities.

Together, these initiatives support the Department's ongoing efforts to modernize public-safety technology, improve operational efficiency, and strengthen organizational capabilities.

BACKGROUND (Consistency with Adopted Plans and Policies, if applicable)
The City of Billings currently operates and maintains Public safety software for Police, Fire, City/County 911 Dispatch, and Yellowstone County Sheriffs Office including the Detention Facility. Public-safety operations increasingly rely on integrated technology systems to manage information, support investigations, maintain records, and ensure accountability. As operational demands and reporting requirements evolve, maintaining effective, reliable, and sustainable technology platforms is essential to the Department's ability to deliver services efficiently and effectively. The Department is currently advancing two complementary technology initiatives.

Axon Technology Program Implementation
The Axon program represents a comprehensive investment in public-safety technology and operational capabilities. Implementation includes the deployment of body worn cameras, in-car audio/video, Taser 10 Less lethal technology, software solutions, and supporting infrastructure designed to improve evidence collection and management, streamline operational workflows, and enhance transparency and accountability. The program also requires coordination of system configuration, integration, personnel training, policy development, and operational adoption to ensure the technology is effectively incorporated into daily operations.

Records Management System Modernization
The Department's existing Records Management System is a legacy system and operates on an on-premises platform. The transition to a cloud-based RMS will modernize the underlying technology environment while providing expanded functionality to address current operational and administrative needs. The upgraded platform introduces enhanced compliance reporting and data validation capabilities, improved workflow efficiency, more comprehensive workload and case management tools, and additional functionality.

Beyond upgrading the existing software platform, RMS modernization provides an opportunity to evaluate and improve workflow processes, standardize records management practices, strengthen data integrity, and enhance the Department's ability to analyze and utilize operational information. These capabilities will support improved investigative oversight, workload visibility, efficiency, and data-informed management decisions.

Both initiatives are intended to provide sustainable technology solutions that support the Department's current operational requirements while positioning the organization for future needs. These presentations will summarize the respective implementation efforts, highlight progress and enhanced capabilities, and identify remaining activities necessary to achieve full operational implementation.

FISCAL EFFECTS
Records Management System Upgrade: Proposed 5-Year fixed contract totaling $3.3 Million. Includes one-time

implementation costs of $418,000 and SaaS subscription in the amount of $582,183 per year. Additionally, City IT will be losing approximately $116,000 annually as a result of lost revenue from a reduction in support costs from Yellowstone County.

STAKEHOLDERS

Billings Police
Billings Fire
Dispatch/911 Communications
Yellowstone County Sheriffs Office
IT

ALTERNATIVES

N/A

City Council Work Session **3.**
Meeting Date: 11/16/2026
TITLE: Email Access Policy
PRESENTED BY: Gina Dahl
Department: Information Technology
Presentation: Yes
Legal Review: Yes
Project Number: N/A

RECOMMENDATION
Staff recommends Council provide direction regarding Resolution 10-18929 after considering staff's recommendation to discontinue the City's current practice.

EXECUTIVE SUMMARY
Resolution 10-18929 requires the City to post Mayor/Council emails online, subject to limited privacy, privilege, and medical information exceptions. This creates two key risks:

- Third-party privacy: Emails to Council can contain private information about uninvolved third parties who have no notice it's being made public.
- Liability exposure: Posting is a voluntary act, not a legal duty (unlike responding to records requests). Posted emails aren't vetted with the same rigor as records-request responses, and aren't screened for defamatory content at all, increasing the City's liability compared to producing the same records only upon request.

Since these emails remain available via public records request regardless of posting status, the added staff time and liability risk of posting them proactively outweighs the benefit to the few who read them online.

Following the September 21 work session, Staff added disclaimer language to additional sites on the City's webpage and developed an AI tool at the request of Council. After some testing, Staff have determined the tool will be used to assist in identifying personally identifiable information or emails which may contain threats. However, the AI tool is unable to identify confidential criminal justice information and false or defamatory information in emails, which is a significant concern and results in civil liability for the City. Additionally, disclaimers are helpful to provide notice to a person sending an email but it does not absolve the City of potential liability for its action of voluntarily re-publishing emails with defamatory or false information.

BACKGROUND (Consistency with Adopted Plans and Policies, if applicable)
Resolution 10-18929 sets forth a policy that requires the posting of all emails to and from the Mayor and City Council unless they contain content that is pertinent to the right of privacy, that is excluded by law or attorney-client privilege from being made public, or that contains private health care or medical information. See attached Resolution. The policy provides, "[w]ith few exceptions, the public cannot expect confidentiality when communicating via email with the Mayor and City Council members individually or collectively on matters of City business." The problem with the current process is that members of the public sometimes email Council with private or false information about other third parties that should not be made public or posted on the City's site. In those cases, that third party would have no idea their private or false information has been disclosed to Council and is being made public. Another example of a problematic email would be one that contains information about a confidential criminal investigation where a victim is entitled to confidentiality.

Subject to the exceptions mentioned above, these emails would certainly be public records under Montana law. The City has a duty to produce public information upon request and a duty to protect information which the law has deemed non-public (i.e., confidential). While posting these emails on the internet is a move toward transparency, it is not required by law as is a public records request. The City choosing to post the emails on the internet increases the City’s risk should the emails contain defamatory statements or confidential criminal justice information. The difference between the City engaging in a voluntary act versus one completed in fulfillment of a duty bears significance. The latter may provide certain protection from liability for the City while the former acts to increase it. For this reason at least, the City bears some responsibility to review each Council email carefully before posting it online. And, even upon review, the City may not be in a position to evaluate whether statements made about third-parties are false or not.

The City Attorney’s Office as a matter of practice, individually vets and reviews responses to public records requests when they contain City emails, prior to release. This is done to ensure the release of information complies with a complex legal framework of constitutional, legislative, administrative, and case law requirements. It would be

contrary to this effort for the posting of Council emails to continue without similar handling.

Also, when the City Attorney's Office produces emails in response to public records requests, they are not reviewed for defamation issues. This is in part due to the fact that the City has a statutory duty to produce records regardless of content to a public records request, unless there is legal authority requiring them to be withheld or redacted. These requirements for withholding and redacting emails do not include the existence of material which is potentially libelous. A website disclaimer may provide some protection against the voluntary publication of defamatory material in Council emails, but the risk of liability for re-publishing such emails remains.

Whether posted or not on the City's website, Council emails remain public records which are required to be produced in response to a public records request subject to the limited exceptions noted above. A cost benefit analysis might suggest that the time spent properly vetting Council emails prior to posting is being expended for the benefit of only a relative few who visit the site to read them while at the same time exposing the City to liabilities that otherwise simply would not exist. Further, producing those same emails as a response to a public records request to those few individuals who wish to read them comes with little to no risk in comparison to the potential risks associated with publicly posting them. A large portion of the risk lies with the public posting itself of the emails.

The IT department was consulted about whether there is an AI tool that could assist in this process. The IT department believes it could develop an AI-assisted workflow to perform an initial review of Council emails and identify or propose redactions for predefined categories of information. However, there is no substitute for the human eye or the performance of the complex legal analysis in determining what can be provided to the public. The Legal Department would still be required to review the emails to determine whether anything was missed or inappropriately redacted, which would not make the process more efficient. Attached to this memo is a detailed assessment outlining the cybersecurity concerns, technical feasibility, limitations of AI-assisted review, and considerations if Council chooses to continue proactive publication. Ultimately, based on an IT risk perspective, it is preferable to discontinue the automatic posting of Council emails without prior review to avoid several additional cybersecurity and operational risks associated with maintaining a public web archive.

The Council Operations subcommittee discussed this matter on September 14, 2026, and voted 2-1 to recommend to the full Council a rescission of the policy and process of automatically posting emails to and from Mayor/Council on the City's website.

Council discussed this recommendation on September 21, 2026, at a work session and asked staff to create an AI tool that would screen and flag problematic emails. Additionally, Council suggested adding disclaimer language in more places on the City's website. Staff have completed both of these tasks. The AI tool has been used and tested and is helpful to a certain degree. However, staff who review Council emails have suggested a secondary level of review from the Legal department instead of primarily relying on the AI tool. As stated above and as discussed at the September 21, 2026, work session, Legal's time would be better spent reviewing these emails as they are requested in a public records request instead of spending time on a daily review of emails which are likely viewed by a relatively small number of people.

The AI tool has value and is being used to assist the Clerk's office in reviewing emails, but it is not relied on to identify emails that cause the most significant concerns, which are emails containing confidential criminal justice information, defamatory content or unsubstantiated and false allegations. Again, the act of voluntarily publishing these types of emails creates a significant risk of liability to the City as there is no general immunity or statutory privilege which applies to the act of republishing emails containing these types of information.

FISCAL EFFECTS

Administrative Costs. Meaningful review of Council emails prior to posting, screening for privacy, privileged, and defamatory content, requires attorney or staff time comparable to that expended on public records request processing. Unlike records requests, however, this cost would be incurred for every covered email regardless of public demand, representing a recurring administrative burden disproportionate to actual public use of the website postings.

Contingent Liability. Because posting is a voluntary act rather than a legal duty, this exposes the City to avoidable liability not otherwise present for privacy claims from third parties whose personal information is disclosed via Council email without their knowledge or consent; and for defamation claims arising from potentially libelous content that, unlike most records request responses, receives no legal screening prior to posting.

These liabilities are not readily quantifiable in advance but represent open-ended exposure to litigation, settlement, and judgment costs that would not exist under a records request only model.

The City incurs a predictable administrative cost to mitigate an unpredictable liability risk, in service of a public benefit, online access for a relatively small number of viewers, that is already available through the existing, lower-risk public records request process.

STAKEHOLDERS

ALTERNATIVES

This is a discussion item and Council may provide direction to staff regarding the email access policy.

Attachments

Resolution 10-18929
IT Assessment

RESOLUTION NO. 10-18929

A RESOLUTION OF THE BILLINGS, MONTANA, CITY COUNCIL AMENDING RESOLUTION NO. 09-18904 ON A CITY COUNCIL E-MAIL ACCESS POLICY BY AUTHORIZING THE CITY STAFF TO EDIT AND REDACT POSTED E-MAILS TO ELIMINATE CONTENT INAPPROPRIATE FOR THE CITY WEBSITE.

WHEREAS, on Dec. 14, 2009, the Billings City Council adopted Resolution No. 09-18904, setting up the first known municipal policy in Montana to require posting on the City website of all e-mails to and from the Mayor and City Council unless they contain content that is pertinent to the right of privacy, that is excluded by law or attorney-client privilege from being made public, or that contains private health care or medical information; and

WHEREAS, within the first quarter of use of the policy, the potential has been identified for abuse of the City web site by e-mails being sent to the Mayor and Council that contain commercial or political solicitation, language inappropriate for posting on the City website, or material that is abusive or defamatory; and

WHEREAS, all e-mails sent to the Mayor and City Council as a group will continue to be delivered to them; and

WHEREAS, the City staff has investigated the policies of the media and others who incorporate public comment on their web sites and found that they moderate submittals.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF BILLINGS, MONTANA AS FOLLOWS:

That the City of Billings hereby adopts an amendment to the *City Council E-mail Access Policy* as provided in Attachment "A".

APPROVED AND PASSED by the City Council of the City of Billings, Montana this 26th day of April, 2010.

THE CITY OF BILLINGS

By: Thomas W. Hanel
Thomas W. Hanel, Mayor

CITY OF BILLINGS * SEAL * YELLOWSTONE COUNTY, MONTANA

ATTEST:

BY: Cari Martin
Cari Martin, CITY CLERK

ATTACHMENT "A"

CITY OF BILLINGS

CITY COUNCIL EMAIL ACCESS POLICY

April 26, 2010

Policy Summary

The City of Billings City Council E-mail Access Policy is intended to allow public access to e-mails sent to or from the Mayor and all City Council members collectively as a group. With few exceptions, the public cannot expect confidentiality when communicating via email with the Mayor and City Council members individually or collectively on matters of City business. Similarly, the Mayor and City Council cannot expect confidentiality when communicating via email with the public or each other on matters of city business. The Mayor and City Council acknowledge and expect certain categories of emails to be excluded from public access ~~such as but not limited to attorney-client communications between the Mayor and City Council or emails containing right of privacy information such as but not limited to personal health or medical information or other personal information.~~ , such as, but not limited to, attorney-client communications; e-mails that violate individual privacy rights, including personal health or medical information; or e-mails that include advertisement, language that is inappropriate for use on the City website, or potentially defamatory or abusive comments.

Policy

CITY COUNCIL E-MAIL ACCESS POLICY

1. All emails sent to and from the Mayor and all City Council members collectively as a group shall be made available to the public through access via the official City of Billings website unless that e-mail contains content pertaining to the right of privacy, is excluded by law or attorney-client relationship from being made public or contains private health care or medical information. The City reserves the right to edit and redact posted e-mails to eliminate commercial and political solicitation, name-calling, crude language, personal abuse, and unfounded allegations. Emails sent to the Mayor and all City Council members will be reviewed once each business day by City staff to determine if they contain any content protected from disclosure by law. If no protected content is found, the emails will be posted to the designated City website location.

2. The Mayor and all members of the City Council are strongly encouraged to obtain an email address and account from the City of Billings and use the account for City business conducted via email. If the Mayor or a City Council member chooses to use a personal email account they should be aware that it is possible that the account or portions of it may be subject disclosure in accordance with Montana law.

3. The Mayor and City Council members are encouraged to conduct personal business on their personal email account(s). However, it is permissible for the Mayor and City council members to forward or briefly reply to personal emails that are sent to a City email account unprompted

4. Emails to or from the Mayor or any City Council member concerning a land use or other quasi-judicial issue shall be made available to the public through access via the official City of Billings website. Land use or quasi-judicial issues include but are not limited to: preliminary or final subdivision plat approval, zone changes, special reviews, variance requests, annexations/de-annexations and street or right of way vacations.

5. The City Administrator shall implement and supervise this policy utilizing appropriate rules such as but not limited to Administrative Orders and other procedures to ensure the most efficient and expeditious posting of Mayor and City Council emails.

6. The City Administrator is also authorized to provide input and suggested amendments as necessary to this Policy.

7. Nothing within this Policy is intended to restrict the public's right to obtain documents pursuant to Montana Code Annotated sections 2-6-101, et seq.

8. This Policy shall be reviewed by the City Council on or before three years from the date of approval.

IT Assessment: Council Email Publication and AI-Assisted Review

1. Cybersecurity Concerns with Proactive Publication

Information harvesting and aggregation

Publishing correspondence on an open website makes names, email addresses, phone numbers, signatures, organizations, and contextual information easier to collect at scale. Automated crawlers, data aggregators, and malicious actors can use exposed information to support spam, phishing, impersonation, social engineering, or other targeted activity.

Persistent hyperlink risk

Council correspondence may contain hyperlinks that are legitimate when an email is initially reviewed and published. The destination can change later through compromise, expiration, changes in ownership, or other events. A link that was safe at publication can therefore become malicious in the future while remaining accessible from City-hosted correspondence.

2. AI-Assisted Review and Redaction

IT believes an AI-assisted workflow is technically possible. The workflow could perform an initial screening and flag or propose redactions for predefined categories such as personally identifiable information, financial or medical information, threatening or inappropriate language, and other content selected by Legal or leadership.

Potential capability	Important limitation
Detect common PII and sensitive data patterns	Context-dependent information may be missed or incorrectly flagged.
Flag potentially threatening or inappropriate language	Sarcasm, coded language, context, and ambiguous wording can reduce reliability.
Propose redactions for human approval	A proposed redaction is not a legal determination that publication is appropriate.
Standardize an initial screening step	Automation can create false confidence if staff treat a 'no issues found' result as assurance.

3. Reliability and Human Review

The central limitation is reliability. Until a workflow is tested against representative Council correspondence, IT cannot determine how accurately it will identify all information that requires redaction or review. False positives would create unnecessary staff work; false negatives are more consequential because sensitive or otherwise problematic content could be published.

For that reason, AI should be treated as an assistive screening tool rather than the final publication authority. Regardless of the technology selected, a meaningful human review process would still be required to address legal and contextual judgments and to validate proposed redactions.

4. Development Feasibility

Based on the initial technical review, IT believes a prototype/beta workflow could likely be developed in roughly two to three weeks.

5. Decision Point

The policy choice is whether the transparency benefit of proactive Internet publication warrants the additional legal review, cybersecurity exposure, technology effort, and ongoing human oversight. IT can technically support either direction, but an AI solution should not be viewed as eliminating the risks or staff responsibilities identified by Legal and IT.

6. IT Recommendation

This assessment aligns with the City Attorney's staff recommendation to discontinue the current proactive posting practice. From a cybersecurity and operational standpoint, retaining Council correspondence as public records and providing responsive records through the established public-records-request (PRR) process would reduce the additional exposure, hyperlink risk, technology effort, and ongoing human-review burden associated with maintaining a proactive public web archive.