



## MEMORANDUM

**TO:** Planning Policy Commission  
**FROM:** Minnie Dhaliwal, CPD Director  
**RE:** Title 18 Update – Part 6, IMC 18.512 – Wireless Communication Facilities  
**DATE:** August 11, 2022

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### Background

The Council Ad Hoc Committee's Title 18 Update Desired Goals and Outcome document identifies the following priority relevant to this topic:

**Goal 13:** *Modernize code and incorporate best practices.*

**Desired Outcome:**

- Create a well-organized, clear code that improves public access to information; provides tools that address community needs; and helps create the kinds of places the community expects.

The draft code for Wireless adapts and updates existing regulations in the Municipal Code.

The packet includes a summary of substantial changes in Attachment A, that focus on improvements to organization of code, process or implementation of direction from the Administration or the Commission; but are actions that do not warrant discussion with the Commission. The following Analysis section includes the additional information to help the Commission's discussion of the policy questions posed for this section of code.

### Summary of Changes for IMC 18.512 Wireless Communication Facilities

The following summarizes the substantive changes made to develop the proposed **18.512 Wireless Communication Facilities** chapter and the reasoning behind it. The changes are based on the gaps analysis, previous discussions with the Planning Policy Commission, a Staff evaluation of existing code and feedback from the City attorney's office.

CHANGE	REASON
1. Purpose section adapted from IMC 18.20.010 with additional language for clarity.	Eliminates vagueness and allows staff to enforce the code.
2. Several sections updated to be consistent with the draft Procedures section of the code update.	This update coordinates with updates of other sections of code.
3. Specific guidance added on permit review and applications specific to wireless facilities.	The purpose of this change is to simplify the permit review process and ensure predictability for applicants and city staff.
4. Using peer city research, a third-party review requirement is added to support the staff review process.	This update is to incorporate modern best practices with for the wireless facility permit review process.
5. Review timelines and process updated to be compliant with federal requirements.	In compliance with 47 CFR 1.6003.
6. For general standards and specifications, standards that read as guidelines—for example, “encouraged,” “discouraged,” terms—were updated with enforceable terms such as “allowed,” and “allowed with conditions.”	Revised to be more specific in new code.
7. Standards that included less direct language for requirements—for example, “shall” or “shall not”—were replaced with “must” or “may not”	Revisions improve clarity of code.

## Previous Meetings

- December 9, 2021 – Planning Policy Commission: Procedures and Administration, ([Agenda/Minutes/Video](#) )

## Timeline

- August 11<sup>th</sup>, 2022 – Public Hearing: Title 18 – IMC 18.508 Accessory Uses, IMC 18.510 Temporary Uses, IMC 18.512 Wireless Communication Facilities, IMC 18.516 Sustainable Micro-Infrastructure, IMC 18.702 Through Block Passages, IMC 18.800 SEPA Rules, and IMC 18.810 Forested Hillside Preservation.
- November 2022 – Public Hearings: Consolidated Draft Title 18 Update