EXHIBIT 13.c: Comments received during Notice of Application Comment Period 2/Optional DNS

From:	Leigh Hwa
To:	City of Poulsbo Planning and Economic Development; Nikole CH. Coleman
Subject:	Public Comments Re: Pinnacle at Liberty Bay PRD and Preliminary Subdivision - REVISED Notice of Application w/Optional DNS
Date:	Wednesday, June 17, 2026 3:16:42 PM

Dear Ms. Coleman,

I am a homeowner in the Crystal View neighborhood whose property directly adjoins the proposed Pinnacle at Liberty Bay development. I am submitting the following public comments regarding the Planned Residential Development (PRD), Preliminary Subdivision application, and the anticipated Mitigated Determination of Nonsignificance (MDNS).

As an immediately adjacent property owner, I have significant concerns regarding the proposed retaining walls, grading activities, drainage systems, long-term maintenance obligations, and potential impacts to neighboring properties.

My primary concern is the proposed retaining wall system along the boundary shared with existing Crystal View homes. Based on the plans currently available to the public, substantial retaining walls and significant grade modifications are proposed adjacent to existing residential properties. However, I have been unable to determine several critical details that may directly affect my property.

Specifically, I respectfully request clarification regarding the following:

1. Retaining Wall Design and Location
   • What type of retaining wall system is proposed?
   • What is the exact distance between the retaining wall and existing Crystal View property lines?
   • What is the width of the buffer area between existing homes and the retaining wall?
   • What maintenance access areas or easements are required?
   • What are the long-term inspection and maintenance requirements for the retaining wall system?

2. Drainage and Groundwater Impacts
   As a neighboring homeowner, I am concerned about how retaining walls, grading, and stormwater facilities may affect existing drainage patterns.

   Please clarify:

   • How groundwater intercepted by the retaining wall system will be managed.

   • Where retaining wall drainage systems will discharge.

• Whether post-development runoff patterns differ from existing conditions.

• What protections are in place to prevent seepage, erosion, or flooding impacts to adjacent residential properties.

• Whether groundwater migration and long-term drainage impacts to neighboring lots have been evaluated.

3. Geotechnical Stability and Long-Term Risk
   The proposed development appears to replace existing natural slope conditions with engineered retaining structures.

   Please clarify:

   • Whether geotechnical studies specifically evaluated impacts to neighboring residential properties.

   • What long-term responsibilities exist for retaining wall inspection, repair, and replacement.

   • Who will ultimately be responsible if retaining wall failure or drainage issues affect neighboring properties.

   • What protections exist if future HOA maintenance is inadequate.

4. Neighborhood Compatibility
   The City's Administrative Interpretation of PMC 18.260.070 states that Planned Residential Developments adjacent to existing neighborhoods must be designed to be consistent with the existing single-family residential environment and that screening measures do not substitute for compliance with that requirement.

   I respectfully request clarification regarding how the proposed retaining walls, significant grade changes, and altered development pattern along the Crystal View boundary have been determined to be consistent with the existing single-family residential environment.

5. Visual Impact Information
   I request that the City provide cross-sections along the Crystal View boundary showing:
   • Existing grade elevations.
   • Proposed grade elevations.
   • Retaining wall heights.
   • Finished floor elevations.
   • Roof ridge elevations of the nearest proposed homes.

These cross-sections would help neighboring property owners better understand the actual relationship between the existing and proposed developments.

Finally, because the City has indicated its intent to issue a Mitigated Determination of Nonsignificance, I respectfully request confirmation that the environmental review has fully evaluated the potential impacts of the retaining wall system, grading activities, groundwater management, drainage systems, and long-term maintenance obligations on adjacent existing residential properties.

Please include this correspondence in the official record for the Pinnacle at Liberty Bay PRD and Preliminary Subdivision application and provide it to City staff, the project applicant, Planning Commission, and Hearing Examiner for consideration during the review process.

Thank you for your consideration.

Sincerely,
Li Hua

Crystal View Neighborhood
Poulsbo, WA

On Wed, Jun 17, 2026 at 9:01 AM City of Poulsbo PED Department <planninginfo-cityofpoulsbo.com@shared1.ccsend.com> wrote:

City of Poulsbo

Public Notice

You are receiving this email because you have signed up to be on a City of Poulsbo PED public outreach list.

The minimum public comment period shall be 14 calendar days. The public may comment on the application and **the comment period will remain open from Wednesday, JUNE 17, 2026, until WEDNESDAY, JULY 1, 2026, at 4:30pm**. The public may request a copy of the decision once made. Public comments may be mailed, emailed, or personally delivered.

The City of Poulsbo has reviewed the proposed project for probable adverse environmental impacts and expects to issue a mitigated determination of nonsignificance (MDNS) for this project. The Optional DNS process in WAC 197-11-355 is being used. ***This may be the only opportunity to comment on the environmental impacts of the proposed project.*** The proposal may include mitigation measures under applicable codes, and the project review process may incorporate or require mitigation measures regardless of whether an EIS is prepared. A copy of the subsequent threshold determination for the proposal may be obtained upon request. Agencies, tribes, and the public are encouraged to review and comment on the proposed project and its probable environmental impacts. **Comments must be submitted between Wednesday, June 17, 2026,** and **WEDNESDAY JULY 1, 2026,** at 4:30pm.
Project documents and public notices for the Pinnacle at Liberty Bay Planned Residential Development and Preliminary Subdivision can be found here. If there is an issue with the link, you can go to https://ci-poulsbo-wa.smartgovcommunity.com/Public/Home > Applications > and search for permit number P-06-20-25-03.

Comments are due by 4:30 pm on Wednesday, July 1, 2026

Thank you!

- REVISED Notice of Application and Optional DNS
- SEPA Checklist

Nikole Coleman, Planning Manager
ncoleman@poulsbo.gov

City of Poulsbo | Planning and Economic Development Department 200 NE Moe Street | Poulsbo, WA 98370 US

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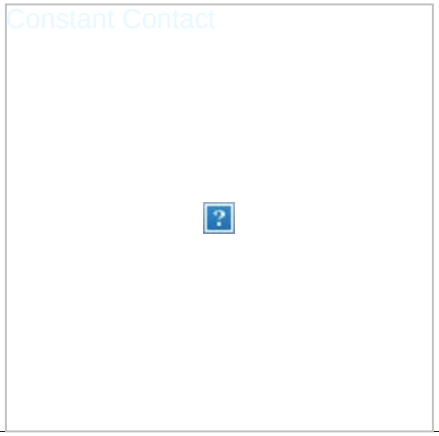

Scott and Mary Kay Magraw
1755 NE Crystallia Court
Poulsbo, WA 98370

June 25, 2026

Planning Commission and City Staff

City of Poulsbo

200 NE Moe Street

Poulsbo, WA

RE: The Pinnacle at Liberty Bay Project

Dear Planning Commissioners and City Staff,

We are homeowners in the Crystal View neighborhood, which is immediately adjacent to the proposed Pinnacle at Liberty Bay development. Our property borders the proposed development on two sides, and one of the entrances to Pinnacle at Liberty Bay will be directly adjacent to our home. We appreciate the opportunity to comment on the revised proposal and respectfully request that the following concerns be carefully considered before any approvals are granted.

Traffic and Construction Access

The revised proposal indicates that the Baywatch entrance has been eliminated, leaving only two access points: Crystallia Court and the future Sunrise Ridge connection. Concentrating all project traffic through these two entrances substantially changes the circulation pattern from the original proposal.

We respectfully request clarification as to whether a revised traffic impact analysis has been completed to evaluate the effects of eliminating the Baywatch access. In addition, we ask the City to identify what measures will be required to minimize the impacts of construction traffic on the existing Crystal View neighborhood. Crystallia Court is a narrow residential street that was not designed to accommodate sustained heavy construction traffic associated with a development of this size. Construction traffic management, pedestrian safety, roadway protection, dust control, and noise mitigation should all be addressed as conditions of project approval.

Compatibility with the Existing Neighborhood

Poulsbo Municipal Code 18.260.070(A) provides that when a Planned Residential Development (PRD) is proposed adjacent to an existing single-family residential subdivision developed with traditional subdivision standards and lot sizes of 7,500 square feet or greater, the PRD shall be designed and developed in a manner that is consistent with the existing single-family residential environment along its perimeter.

Crystal View was developed with traditional subdivision standards and larger residential lots. Despite revisions to the proposal, the perimeter lots adjacent to Crystal View remain substantially smaller than those within our neighborhood and do not appear to provide the compatible transition contemplated by the municipal code.

The applicant's December 1, 2025, response states that the project is no longer considered "adjacent" to Crystal View because an HOA-maintained tract containing a screening fence, wall, and landscaping will separate the developments. Respectfully, we do not believe this interpretation reflects either the intent or the purpose of PMC 18.260.070(A).

The proposed tract does not meaningfully separate the two neighborhoods. The homes within Pinnacle will still directly border and overlook existing Crystal View homes. The visual, privacy, density, and neighborhood compatibility impacts remain unchanged regardless of whether a narrow maintenance tract exists between property lines. Simply inserting an HOA tract should not eliminate the City's responsibility to ensure that the perimeter design is compatible with the existing neighborhood.

Accepting this interpretation could also establish a precedent whereby future developments could avoid the compatibility requirements of PMC 18.260.070(A) simply by inserting a narrow maintenance tract between property lines. We do not believe that reflects the intent of the ordinance or the City's long-standing goal of providing appropriate transitions between differing residential developments.

We respectfully request that the City require the applicant to demonstrate how the revised design satisfies both the letter and the intent of PMC 18.260.070(A). We also ask the City to consider whether larger perimeter lots, increased setbacks, and enhanced buffering would provide a more appropriate transition between the proposed PRD and the existing Crystal View neighborhood.

Character of the Neighborhood

The purpose of the Planned Residential Development (PRD) ordinance is to encourage **creative and superior site design** while preserving open space, scenic and natural features, and ensuring consistency with the City's Comprehensive Plan. The flexibility granted through the PRD process is intended to produce a development that is superior to a conventional subdivision—not simply one with smaller lots. Likewise, the Residential Low (RL) zoning district is intended to recognize, maintain, and protect established low-density residential neighborhoods and promote neighborhood livability. We respectfully ask the Planning Commission to evaluate this proposal in light of these stated purposes.

We respectfully request that the Planning Commission ensure that the flexibility afforded under the PRD ordinance results in the superior site design envisioned by the Poulsbo Municipal Code and that the compatibility requirements intended to protect established neighborhoods are fully implemented. Growth is an important part of Poulsbo's future, but it should occur in a manner that preserves neighborhood livability and provides an appropriate transition between new and existing residential communities.

Thank you for your consideration.

Best regards,

Mary Kay Magraw

Date:

Scott Magraw

Date:

From:	Bruce B
To:	Nikole CH. Coleman
Subject:	Comments on proposed Pinnacle At Liberty Bay Priject
Date:	Thursday, June 18, 2026 10:15:26 AM

After the public meeting last year, I provided a letter with my concerns about this proposed development. I have also read the comments from other concerned residents; some of which bring up violations of regulations or laws. I saw no comments in favor of this development.

I have reviewed the latest amended subject project proposal and don't see any significant changes that would lead me to change my negative opinion of this development. There appears to be no intent to address concerns for small lot size, incompatibility with adjacent properties, dense housing, narrow roadways, traffic flow, ingress/egress to Highway 305; and, my biggest concerns: my access to Highway 305 from my driveway on the west side of the highway, and destabilization of the hillside above me.

Your latest public notices (postcards) include a statement that "Access is planned from NE Crystallia Court and Sunrise Ridge Avenue NE". No mention is made of access through Baywatch, yet that road still appears in the site plan, and it is obvious that it will be the main path when coming/going north towards Poulsbo or Highway 3.

I will repeat some of my **earlier comments**:

I live on Highway 305, directly across the highway from this project. The traffic this development will bring to Highway 305 will only make the congestion on the highway in this area worse than it already is. There are seven homes (one is mine) that are directly across 305 from the proposed project; all served by only 3 driveways coming off the west side of 305. As it is now, access to 305, especially turning north, is difficult and unsafe most of the time during the day. Much of the traffic will probably enter and leave this project by moving through the Baywatch subdivision, accessing Highway 305. We were told at the April meeting that the State would not allow another traffic light in this area. Even if they did, it would still be difficult access for us since our driveways don't align with Baywatch.

In the traffic study I see some items which make me question its conclusions: Table 1, Roadway Network, is misleading in describing the area along Highway 305. 305 has only 2 lanes, no sidewalks, and no bike facilities in the area near the project. They need to clarify that their description of 305 is totally different in the area of the project (near Baywatch) than at Hostmark or the roundabout. Also, the report makes no mention of how our access to 305 will be affected or mitigated.

The Geotechnical Engineering Report identifies high and moderate landslide hazards (section 5.1) and implies they are of no concern. I find it concerning they do not address how the property will be

affected by the removal of 60% of the healthy trees needed for development, as stated the Tree Protection Plan. I, and my neighbors, are in the Critical Area directly below this project.

As you can glean from my comments, I would very much like for this property to not be developed with the density of housing proposed. Fewer units would be more tolerated. I am very concerned by the big push recently for dense housing to come to the Poulsbo area. You are promoting the loss of the appeal of this region. There is plenty of land away from Poulsbo that could be developed with much less impact to the quality of life in our existing community.

It appears you are just moving forward, ignoring the concerns of the people most affected by this project.

Unfortunately, I will be unable to attend the July1 meeting.

Sincerely,

Bruce Brockett
17373 State Highway 305 NE
907-250-1248

June 18, 2026

Ms. Nikole Coleman
Planning Manager
Planning and Economic Development Department
City of Poulsbo
200 NE Moe Street
Poulsbo, WA 98370

Re: Pinnacle at Liberty Bay PRD – Apparent Extension of Retaining Structure Along Road B

Dear Ms. Coleman,

Thank you for your recent response regarding our inquiry concerning the retaining structure depicted along Road B in successive plan revisions submitted for the Pinnacle at Liberty Bay PRD. The issue also bears upon prior City Engineering comments regarding constructability and potential trespass concerns associated with retaining structures along the Crystal View boundaries.

After further review of the December 2025 and April 2026 civil plan sets, we remain concerned that the current plans appear to depict a materially longer retaining structure along the eastern side of Road B than was shown in the earlier drawings. While it is possible that the difference reflects drafting conventions or plan refinement rather than a substantive design change, the current project record does not appear to explain the apparent increase in length or the purpose served by the additional segment.

This issue is significant because the topographic conditions along the boundary between Crystal View and the proposed Pinnacle project do not appear to be uniform.

Along portions of the western Crystal View boundary, the proposed retaining structure appears to correspond to areas where excavation and vertical cuts may be necessary adjacent to existing residential properties. However, farther south, near the Road B / Road A intersection and the proposed connection to Crystalia Court, the existing conditions appear materially different. In that area, substantial fill may be required to construct the proposed roadway system and achieve the necessary roadway connections.

Accordingly, it is not apparent from the current plans whether the retaining structure depicted along Road B is intended to perform a single retaining function along its entire length or whether different portions of the structure are intended to serve different purposes, including retention of existing ground conditions in some areas, to replace existing natural lateral support, and retention of engineered roadway fill in others.

The March 30, 2026, Administrative Interpretation of PMC 18.260.130 explained that preliminary plans are intended to identify the location, scale, and "general characteristics" of proposed structural features so that their relationship to surrounding properties and site design may be evaluated.

The apparent extension of the Road B retaining structure raises precisely that type of question. If the structure now depicted performs materially different functions along different portions of its length, that information would appear relevant to understanding its general characteristics and its relationship to both adjacent properties and the overall site design.

We therefore respectfully request that the Applicant be asked to address the following questions:

1. Did the Applicant intend for the depiction of the retaining structure shown along Road B in the April 2026 plan set to indicate any changes in length, extent, purpose, or function from the structure depicted in earlier plan sets? If not, please explain the apparent differences visible in the successive drawings. If so, please explain the nature of such changes and why such changes are necessary at the present stage of project review.;

2. Whether different portions of that depicted structure are intended to serve different retaining purposes?;

3. Does the Applicant contend that the present project record adequately discloses the "general characteristics" of the retaining structure depicted in the April drawing set? If so, please identify the documents, plan sheets, reports, or other portions of the project record in which such disclosures may be found.;

4. Whether any expansion of or revisions to the most recent geotechnical analysis are necessary to support the apparent extension of that retaining structure?; and

5. Has the Applicant evaluated whether different portions of the depicted retaining structure may require different geotechnical assessment, design approaches, or construction methodologies based upon the differing topographic conditions along its length?

These questions are not intended to request final engineering design details. Rather, they are directed toward understanding the nature, purpose and general characteristics of a significant structural feature that appears to have evolved during the course of project review.

Thank you for your consideration.

Respectfully submitted,

Dana Lockhart

Katharine Lockhart

1780 NE Crystal View Ct., Poulsbo, WA 98370

June 22, 2026

Ms. Nikole Coleman
Planning Manager
Planning and Economic Development Department
City of Poulsbo
200 NE Moe Street
Poulsbo, WA 98370

Re: Pinnacle at Liberty Bay Planned Residential Development and Preliminary Subdivision

Second Public Comment Period – PMC 18.260.070(A) Consistency Questions

Dear Ms. Coleman:

We appreciate the City's decision to issue a revised Notice of Application and provide a second public comment period in recognition that the project has undergone substantial revision since originally noticed.

Concerns regarding compliance with PMC 18.260.070(A) have been raised throughout the review process, including during the original public comment period in September 2025, in subsequent correspondence submitted during staff review, in our January 31, 2026, consistency submission and accompanying Appendix A, and in our requests for Administrative Interpretation and clarification. Since those earlier submissions, two Administrative Interpretations have been issued, the project has undergone additional revisions, lot and tract designations have changed, and a second public comment period has been opened.

Accordingly, we respectfully request that the Applicant provide written responses to the following questions so that the Planning Commission, Hearing Examiner, and public may evaluate the proposal on the basis of a complete record.

I. Administrative Interpretations and Current Project Configuration

The Administrative Interpretation dated March 30, 2026, and Administrative Interpretation No. 2 dated June 22, 2026, now form part of the project record and confirm that PMC 18.260.070(A) establishes a mandatory consistency objective implemented through the City's discretionary review process. The Interpretations further confirm that the consistency requirement of subsection (A) and the screening provisions of subsection (B) are separate requirements.

Since submission of our January 31, 2026, correspondence, the Applicant has revised the project plans and renumbered or re-lettered various lots and tracts. While those revisions affect certain

references contained in the attached January submission and Appendix A, the underlying issues remain relevant because they concern the development pattern presented toward the existing Crystal View subdivision rather than the particular lot or tract labels appearing on a given plan revision.

Definition Used in the Questions Below

For purposes of the questions set forth below, references to the "development pattern presented toward" the Crystal View subdivision (or similar phrases) refer to the arrangement, size, orientation, spacing, and physical relationship of the proposed Pinnacle lots, homes, streets, tracts, retaining structures, screening features, and other development elements located along and nearest to the western and southern boundaries shared with Crystal View.

In particular, such references are intended to describe those portions of the Pinnacle proposal that are positioned in closest proximity to the common boundary between the two developments and that therefore contribute to the single-family residential environment presented at the adjacent perimeter of the PRD.

Consistent with the terminology used in the Administrative Interpretations, the focus of these questions is the residential environment created along the shared boundary between the Pinnacle PRD and the Crystal View subdivision, rather than solely the status of any particular lot under a specific interpretation of the term "adjacent."

II. Questions for the Applicant

Question 1.

The two Administrative Interpretations attached hereto form part of the project record and address the meaning and application of certain provisions of the Poulsbo Municipal Code, including PMC 18.260.070(A).

Does the Applicant disagree with any material statement, interpretation, or conclusion contained in either of the attached Administrative Interpretations?

If so, please identify each point of disagreement and explain the basis for the Applicant's position.

Question 2.

With reference to the latest submitted civil plan drawings dated April 9, 2026, please identify the specific features of the current project design that the Applicant contends were intentionally incorporated for the purpose of satisfying the mandatory consistency requirement of PMC 18.260.070(A) that a PRD be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter.

Question 3.

Does the Applicant contend that the mandatory consistency requirement of PMC 18.260.070(A) applies only to project lots that are definitionally "adjacent" to an existing subdivision, rather than to the development pattern presented toward the adjacent residential environment?

If so, please explain the basis for that position.

Question 4.

For the portions of the PRD facing the western and southern boundaries of Crystal View, please identify:

(a) the project lots and homes that the Applicant contends are subject to the consistency provisions of PMC 18.260.070(A);

(b) the project lots and homes that the Applicant contends are not subject to those provisions; and

(c) the basis for those distinctions.

Question 5.

PMC 18.260.070(B) authorizes screening measures that may include vegetated buffers designed as open-space tracts.

Does the Applicant contend that the use of such screening tracts can eliminate, negate, or otherwise affect the applicability of the separate mandatory consistency requirement established by PMC 18.260.070(A)?

If so, please explain.

Question 6.

Does the Applicant contend that the insertion of intervening tracts, roads, screening areas, retaining structures, access tracts, or similar features may affect the applicability of PMC 18.260.070(A) to the development pattern presented toward an adjacent subdivision?

If so, please explain the limiting principle that the Applicant believes applies.

Question 7.

Please identify any prior City of Poulsbo Planned Residential Development approval, subdivision approval, staff report, Planning Commission recommendation, Hearing Examiner decision, Administrative Interpretation, or other City action that the Applicant contends supports its interpretation and application of PMC 18.260.070(A) to the current Pinnacle proposal.

For each example identified, please explain how the circumstances are relevant to the Applicant's position regarding compliance with PMC 18.260.070(A).

Question 8.

In evaluating consistency under PMC 18.260.070(A), does the Applicant contend that factors such as lot size, lot width, lot depth, housing type, housing scale, and overall development pattern are relevant considerations?

If so, please explain how those factors were evaluated in the design of the portions of the Pinnacle project facing Crystal View.

If not, please explain why the Applicant believes such factors are not relevant to the consistency determination.

Question 9.

Appendix A-2 contains factual information and observations regarding the current Pinnacle proposal, including lot counts, lot dimensions, lot sizes, lot widths, perimeter conditions, tract locations, and other features of the portions of the PRD proximate to the western and southern boundaries of Crystal View.

Does the Applicant disagree with any factual statement, measurement, calculation, lot identification, tract identification, or other description of the Pinnacle proposal contained in Appendix A-2?

If so, please identify each point of disagreement and explain the basis for the Applicant's position.

Question 10.

Assuming the factual characteristics of the current Pinnacle proposal described in Appendix A-2 are substantially accurate, please explain how the Applicant contends that those characteristics satisfy the requirement of PMC 18.260.070(A) that the PRD be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter.

In responding, please identify the specific planning considerations, design features, or other factors upon which the Applicant relies in reaching that conclusion.

III. Prior Correspondence and Supporting Materials

Attached for reference and incorporation into the record are:

Attachment A - Administrative Interpretation (P-03-02-26-01), dated March 30, 2026

Attachment B - Administrative Interpretation No. 2 (P-06-01-26-01), dated June 22, 2026

Attachment C - Lockhart Letter Regarding PMC 18.260.070(A), dated January 31, 2026

Attachment D - Appendix A to January 31, 2026, Lockhart Letter

Attachment E - Appendix A-2 (June 21, 2026)

Although portions of Appendix A (Attachment D) may no longer correspond directly to current Pinnacle project lot numbering and tract lettering, the attachment remains relevant because it documents the nature and extent of the consistency concerns previously identified and raised during project review.

Conclusion

The purpose of these questions is not to revisit either Administrative Interpretation, but rather to understand how the Applicant contends that the current proposal satisfies the mandatory consistency requirement recognized in the Interpretations.

We respectfully request that the Applicant's responses be included in the public record for consideration by the Planning Commission and Hearing Examiner.

Thank you for your consideration.

Respectfully submitted,

Dana Lockhart

Katharine Lockhart

cc: Crystal View Homeowners Association

Docusign Envelope ID: 9B4274EA-75EB-417F-8225-FBB3F33740CA

Attachment A

PLANNING AND ECONOMIC DEVELOPMENT

Administrative Interpretation

200 NE Moe Street | Poulsbo, Washington 98370
(360) 394-9748 | fax (360) 697-8269
www.cityofpoulsbo.com | plan&econ@cityofpoulsbo.com

To: Planning and Economic Development Department

From: Heather Wright, AICP

Subject: Administrative Interpretation - Lockhart

Date: March 30, 2026

Question:

The City received a request for an Administrative Determination regarding the interpretation and application of provisions of Poulsbo Municipal Code (PMC) Chapter 18.260 – Planned Residential Development (PRD) in connection with the review of a proposed PRD and Preliminary Subdivision.

The request seeks clarification regarding:

1. Whether PMC 18.260.130 (Submittal Requirements) requires retaining wall construction materials to be identified on submitted civil plans.
2. How PMC 18.260.070 (Planned Residential Development Site Design Criteria) should be interpreted when a PRD is proposed adjacent to an existing subdivision developed under traditional subdivision standards.
3. The relationship between the design consistency requirement in subsection (A) and the screening requirements in subsection (B).
4. The role and authority of City staff, the Planning Commission, and the Hearing Examiner in evaluating compliance with the requirements of PMC 18.260.070.

This interpretation provides clarification on the application of these provisions of the PMC.

The request includes a number of specific questions regarding the interpretation and application of PMC 18.260.070. This administrative interpretation addresses the relevant provisions of the PMC necessary to clarify how the code is applied. The interpretation is not intended to respond to each question individually but rather to clarify the applicable code provisions and the framework under which they are applied. Finally, this administrative interpretation does not constitute a determination regarding whether any specific development proposal satisfies the applicable design criteria.

Background:

Chapter 18.260 of the Poulsbo Municipal Code establishes standards for PRDs. PRDs are intended to provide flexibility in site design while ensuring that development remains compatible with surrounding neighborhoods and consistent with the intent of the Comprehensive Plan and underlying zoning district.

The proposed PRD subdivision would be located on property zoned Residential Low (RL) and shares boundaries with existing residential neighborhoods that were developed under traditional subdivision standards with larger lot sizes.

Clarification has been requested regarding the application of PMC 18.260.070(A), which requires that when a PRD is proposed adjacent to an existing single-family residential zone developed utilizing traditional subdivision standards and lot sizes of 7,500 square feet or greater, the PRD must be designed so as to be consistent with the single-family residential environment at its adjacent perimeter.

Clarifications were also requested regarding whether screening elements such as walls, fences, landscaping, or buffer tracts affect the applicability of the adjacency requirement and whether such screening may substitute for compliance with the design consistency requirement.

Additionally, clarification was requested regarding PMC 18.260.130(E), which requires subdivision or site plans to indicate the location, height, and construction materials of walls and fences.

Docusign Envelope ID: 9B4274EA-75EB-417F-8225-FBB3F33740CA

Because PRDs involve discretionary review and evaluation of site design, interpretation of these provisions is necessary to clarify how the code is applied during the development review process.

Interpretation:

1. *Submittal Requirements for Retaining Walls*

   PMC 18.260.130, Application Submittal Requirements, states that an application for a Planned Residential Development must contain the submittal requirements identified in the applicable application form. Because a PRD that creates lots also requires preliminary subdivision approval, the application must also meet the applicable preliminary subdivision submittal requirements.

   The preliminary subdivision application materials require that plans identify the location of existing and proposed walls and fences and indicate their height and construction materials. This requirement ensures that the City and reviewing authorities can understand the general location and scale of proposed screening or structural features that may affect adjacent properties.

   At the preliminary subdivision stage, these plans are conceptual in nature and are intended to demonstrate the proposed layout and general characteristics of the development. Detailed engineering design and construction specifications are typically addressed during subsequent phases of project review.

   Accordingly:

   - Preliminary plans must show the location and general characteristics of proposed walls or fences.
   - Final engineering design, structural specifications, and construction details are typically provided during grading permit and civil plan review.

   The purpose of the preliminary subdivision requirement is to ensure that proposed screening and structural features are identified early in the review process so their relationship to surrounding properties and site design can be evaluated. The requirement does not replace the more detailed review that occurs during civil engineering and construction permitting.

2. *Applicability of PMC 18.260.070(A) – Design Consistency Requirement*

   PMC 18.260.070(A) applies when a PRD is proposed adjacent to an existing single-family residential zone which has been developed utilizing traditional city subdivision development standards and lot sizes of 7,500 square feet or larger.

   For purposes of interpreting this provision, the definitions contained within the Poulsbo Municipal Code apply.

   > "Abutting" means contiguous or adjoining with a common boundary line, except that where two or more lots adjoin only at a corner or corners, they shall not be considered as abutting unless the common property line between the two parcels measures eight feet or more in a single direction. The term includes the terms adjacent, adjoining, and contiguous.
   >
   > "Adjacent" means abutting or located directly across a street right-of-way.

   The phrase "adjacent perimeter" refers to the portion of the project boundary where the PRD site is adjacent to an existing subdivision or residential zone. The code does not require that all portions of the PRD perimeter meet the adjacency condition, nor does it require that every individual lot within the PRD be adjacent to the neighboring subdivision. Rather, the requirement applies to the portion of the project perimeter where adjacency exists.

   Based on these definitions, a PRD is considered adjacent to an existing subdivision when the project site shares a common boundary with the subdivision or is located directly across a street right-of-way from the subdivision.

   PMC 18.260.070(A) states that when a PRD is proposed adjacent to such development, the PRD shall be designed so as to be consistent with the single-family residential environment at its adjacent perimeter. The provision further states that the review authority may require the PRD to make provisions such as matching lot sizes, lot widths, or house height and scale (or other provisions as deemed appropriate) for those lots that are located adjacent to the existing subdivision.

Docusign Envelope ID: 9B4274EA-75EB-417F-8225-FBB3F33740CA

The use of the word "may" indicates that the code provides discretionary authority to the review authority to determine whether such provisions are necessary to address compatibility at the adjacent perimeter. The examples listed in the code are illustrative tools that the review authority may apply where appropriate. The code does not require that any specific design provision be imposed in every case, nor does it establish a prescriptive formula for achieving compatibility.

Accordingly, PMC 18.260.070(A) establishes that when adjacency exists, the PRD must be evaluated for compatibility with the surrounding residential environment, and the review authority retains discretion to determine whether specific design provisions are necessary to address that relationship.

3. *Interpretation of "Single-Family Residential Environment"*

PMC 18.260.070(A) requires that when a PRD is proposed adjacent to an existing single-family residential zone developed utilizing traditional subdivision standards and lot sizes of 7,500 square feet or larger, the PRD shall be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter.

The PMC does not provide a specific definition of the term "environment" as used in this provision. In the absence of a defined term, words and phrases are interpreted according to their plain and ordinary meaning within the context of the regulation.

Within the context of PMC 18.260.070(A), the phrase "single-family residential environment" refers to the overall physical and visual character typically associated with a traditional single-family residential neighborhood.

This environment may include characteristics such as:

- Housing type and orientation
- Lot configuration and spacing
- Building scale and massing
- Relationship of structures to adjacent properties
- Streetscape patterns and neighborhood layout
- Landscaping, buffering, and visual transitions between developments

The code does not prescribe specific quantitative thresholds for these characteristics. Instead, the provision establishes a performance-based design standard intended to ensure compatibility between new PRD development and existing single-family neighborhoods at the project perimeter.

Accordingly, the phrase "single-family residential environment" is not limited solely to the presence of single-family detached homes. Rather, it encompasses the broader physical and visual characteristics that contribute to the overall residential character of the surrounding neighborhood.

The evaluation of whether a proposed PRD is consistent with the single-family residential environment at its adjacent perimeter is conducted through the City's development review process and considered by the review authority as part of the project's overall design review.

In addition, the PMC defines "Dwelling, single-family" as *a building containing but one kitchen, except* where *a valid accessory dwelling unit has been approved.*

This definition focuses on the type of residential structure, specifically the presence of a single dwelling unit within a building. The definition does not reference or distinguish between the method by which a lot is created, such as whether the dwelling is located within a traditional subdivision or within a Planned Residential Development.

Accordingly, a single-family dwelling retains the same definition regardless of whether it is located within a subdivision created through traditional subdivision standards or within a PRD. The regulatory mechanism used to create lots or organize a development pattern does not alter the underlying definition of a single-family dwelling.

Therefore, the phrase "single-family residential environment" in PMC 18.260.070(A) should be understood to refer to the broader physical and visual character of a neighborhood composed primarily of single-family dwellings, rather than the specific subdivision process used to create the lots on which those dwellings are located.

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4. *Role of the Review Authority and Application of PMC 18.260.070(A)*

Planned Residential Developments and preliminary subdivisions are reviewed through the City's Type III land use process. Under this process, City planning staff conduct the technical review of the application and prepare a staff report and recommendation addressing compliance with applicable provisions of the PMC. The Hearing Examiner serves as the decision-making authority and issues the final decision on the application.

Accordingly, the determination of whether a proposed PRD satisfies the requirements of PMC 18.260.070(A) is made through the development review process and is ultimately determined by the Hearing Examiner based on the full record, including staff analysis, application materials, and public testimony.

PMC 18.260.070(A) establishes both a mandatory design objective and discretionary authority for the review authority. The first sentence states that when a PRD is proposed adjacent to an existing single-family residential zone developed utilizing traditional subdivision standards and larger lot sizes, the PRD shall be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter. The use of the word "shall" establishes a required design standard that must be considered during review of the proposed development.

The second sentence of the subsection states that the review authority may require the PRD to make provisions such as matching lot sizes, lot widths, or house height and scale, or other provisions as deemed appropriate for those lots located adjacent to the existing subdivision. The use of the word "may" indicates that the code provides the review authority with discretion to determine whether such provisions are necessary to address compatibility at the adjacent perimeter.

The examples listed in the code, such as matching lot sizes, lot widths, or house height and scale, are illustrative rather than mandatory requirements. The code authorizes the review authority to require such measures where appropriate but does not require that any particular design provision be imposed in every case.

If the review authority determines that a proposed PRD does not satisfy the applicable decision criteria or development standards of the Poulsbo Municipal Code, the Hearing Examiner retains the authority provided under the City's land use procedures to approve the application, approve the application with conditions, deny the application, or remand the application for additional review or modification, consistent with the applicable procedures and decision criteria of the municipal code.

PMC 18.260.070 also includes additional requirements in subsection (B), which apply in addition to subsection (A) where applicable. Each subsection establishes separate requirements within the PRD design framework. Compliance with one provision does not eliminate the applicability of other provisions unless expressly stated in the code.

Finally, the second sentence of PMC 18.260.070(A) limits the potential design provisions that may be required by the review authority to those lots located adjacent to the existing subdivision, which reflects the purpose of the section to address compatibility at the perimeter where differing development patterns may meet. This provision preserves discretion for the review authority while focusing potential design responses on the portion of the development where adjacency occurs.

5. *Application to the Pinnacle at Liberty Bay PRD*

The Pinnacle at Liberty Bay PRD is currently under review through the City's development review process. As part of that review, the proposed PRD has been evaluated for adjacency to surrounding residential neighborhoods consistent with the definitions and interpretation described above.

Consistent with PMC 18.260.070(A), the review authority retains discretion to determine whether specific design provisions are necessary to ensure compatibility between the proposed development and existing surrounding neighborhoods.

Additional analysis and findings related to the application of PMC 18.260.070(A) to the Pinnacle PRD may be included as part of the project's development review record and decision.

This administrative interpretation clarifies how the applicable provisions of the PMC are interpreted and applied. It does not constitute a determination regarding whether any specific development proposal satisfies the

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applicable design criteria. That determination is made through the City's development review process and ultimately by the Hearing Examiner based on the full record.

6. Relationship Between Subsections (A) and (B)

   PMC 18.260.070(B) establishes requirements for perimeter screening, including fencing, landscaping, or other buffering measures where a PRD abuts existing residential zones.

   Subsection (B) expressly states that these screening provisions apply "in addition to subsection A."

   Because subsection (B) is written as an additional requirement, it does not replace or eliminate the design consistency requirement contained in subsection (A). Instead, screening measures are intended to mitigate visual impacts and provide buffering between developments, while subsection (A) addresses the broader issue of overall neighborhood compatibility and design character.

   Accordingly:

   - Compliance with screening requirements does not substitute for compliance with the design consistency requirement.
   - Screening measures may be used to assist in achieving compatibility but do not independently satisfy the requirement of subsection (A).

Conclusion:

PMC 18.260.130 requires subdivision and PRD plans to identify the location, height, and general characteristics of walls and fences. At the preliminary review stage, plans are conceptual in nature and are intended to demonstrate the general layout and characteristics of the proposed development. Identification of the general location and height of walls or fences is sufficient at this stage, with detailed engineering design and construction specifications typically provided during subsequent grading permit and civil plan review.

PMC 18.260.070(A) establishes a project-level design requirement that when a PRD is proposed adjacent to an existing single-family residential zone developed utilizing traditional subdivision development standards and lot sizes of 7,500 square feet or greater, the PRD must be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter. This requirement is triggered when adjacency exists between the PRD site and such development and applies to the portion of the project perimeter where that adjacency occurs. The provision does not require that every individual lot within the PRD be adjacent to the existing subdivision.

PMC 18.260.070(A) further provides the review authority with discretion to determine whether specific design provisions—such as matching lot sizes, lot widths, or house height and scale—are necessary to achieve compatibility at the adjacent perimeter. The examples listed in the code are illustrative measures that may be applied where appropriate and are not mandatory in all cases.

PMC 18.260.070(B) establishes screening requirements that apply in addition to the design consistency requirement in subsection (A). Screening measures such as fencing, landscaping, or buffering are intended to mitigate visual impacts between developments but do not replace or substitute for the design consistency requirement.

Determination of whether a proposed PRD satisfies the applicable provisions of PMC 18.260.070 is made through the City's discretionary development review process. Planning staff conduct the technical review of the application and provide analysis and recommendations, and the Hearing Examiner serves as the decision-making authority who evaluates the full record and determines whether the proposal satisfies the applicable provisions of the Poulsbo Municipal Code.

This administrative interpretation clarifies the meaning and application of the relevant provisions of the Poulsbo Municipal Code and does not constitute a determination regarding whether any specific development proposal satisfies those provisions.

Authority:

PMC 18.300.020 authorizes the Planning Director to make administrative determinations and interpretations regarding the application of provisions of Title 18. Such determinations must be consistent with the spirit and intent of the Poulsbo Municipal Code and the Comprehensive Plan.

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Formal interpretations issued by the Planning Director are maintained by the Planning and Economic Development Department and serve as guidance for the consistent administration of the City's development regulations.

Authority:

The decision is final. This decision may be appealed to the Hearing Examiner within 14 days. The written appeal, appeal fee, and deposit must be received by the PED department no later than 4:30 p.m. on Monday, April 13th, 2026.

Signed by:
Heather Wright
EAC69A034B784AD...

Heather Wright, AICP, Planning and Economic Development Director — 3/30/2026 Date

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Attachment B

PLANNING AND ECONOMIC DEVELOPMENT

Administrative Interpretation

200 NE Moe Street | Poulsbo, Washington 98370
(360) 394-9748 | fax (360) 697-8269
www.cityofpoulsbo.com | plan&econ@cityofpoulsbo.com

To: Planning and Economic Development Department

From: Heather Wright, AICP

Subject: Administrative Interpretation No. 2 – Lockhart | P-06-01-26-01

Date: June 22, 2026

Question:

The City received a request for an Administrative Determination regarding the interpretation and application of provisions of the Poulsbo Municipal Code (PMC) Chapter 18.260 – Planned Residential Development (PRD).

The request seeks clarification regarding:

1. Whether the terms "consistent" and "compatible" constitute separate regulatory standards under PMC 18.260.070(A).
2. What portion of a PRD is relevant when evaluating consistency with the single-family residential environment at the adjacent perimeter.
3. The interaction between PMC 18.260.070(A) and PMC 18.260.070(B) when screening measures are required or authorized under subsection (B).
4. The meaning of the phrase "general characteristics" as it relates to walls and similar structural features depicted on preliminary subdivision plans.

This interpretation provides clarification on the application of these provisions of the PMC.

The request includes a number of specific questions regarding the interpretation and application of PMC 18.260.070 and PMC 18.260.130. This administrative interpretation addresses the relevant provisions of the PMC necessary to clarify how the code is applied. The interpretation is not intended to respond to each question individually but rather to clarify the applicable code provisions and the framework under which they are applied. Finally, this administrative interpretation does not constitute a determination regarding whether any specific development proposal satisfies the applicable design criteria.

Background:

Chapter 18.260 of the PMC establishes standards for Planned Residential Developments (PRDs). PRDs are intended to provide flexibility in site design while ensuring that development remains consistent with the intent of the Comprehensive Plan and underlying zoning district.

On March 30, 2026, the Planning Director issued an Administrative Interpretation (P-03-02-26-01) addressing various provisions of PMC Chapter 18.260, including the interpretation of PMC 18.260.070 and PMC 18.260.130. Additional clarification has been requested regarding the meaning and application of certain terms and provisions discussed in that interpretation. This interpretation supplements and should be read together with the March 30, 2026, and is not intended to modify or supersede the interpretations contained therein.

Interpretation:

1. *Interpretation of PMC 18.260.070(A) – Consistency Standard*

   PMC 18.260.070(A) states that when a PRD is proposed adjacent to an existing single-family residential zone developed utilizing traditional subdivision development standards and lot sizes of 7,500 square feet or larger, the PRD shall be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter.

   The PMC establishes "consistency" as the operative regulatory standard applicable to PRD design at the adjacent perimeter. The code does not establish separate regulatory definitions or independent tests for the terms "consistent" and "compatible" within PMC 18.260.070(A).

   The March 30, 2026, Administrative Interpretation discussed the evaluation of whether a proposed PRD satisfies the consistency requirement established by PMC 18.260.070(A) using the term "compatibility" within the context of the

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discretionary review process. The March 30 interpretation did not establish compatibility as an independent regulatory standard separate from the consistency requirement contained within PMC 18.260.070(A).

Accordingly, PMC 18.260.070(A) establishes a single design standard requiring that the PRD be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter. Evaluation of whether that standard has been met occurs through the City's development review process.

2. *Portion of the Planned Residential Development Relevant to Evaluation*

PMC 18.260.070(A) applies when a PRD is proposed adjacent to qualifying existing residential development.

As stated in the March 30, 2026, Administrative Interpretation, the phrase "adjacent perimeter" refers to the portion of the project boundary where the PRD site is adjacent to an existing subdivision or residential zone. The code does not require that every lot within the PRD be adjacent to the neighboring subdivision.

The provision further authorizes the review authority to require matching lot sizes, lot widths, house height and scale, or other provisions deemed appropriate for those lots located adjacent to the existing subdivision.

Accordingly, PMC 18.260.070(A) is evaluated with reference to the portion of the PRD where adjacency exists. As stated in the March 30, 2026, Administrative Interpretation, the provision does not require that every individual lot within the PRD be adjacent to the existing subdivision. The second sentence of PMC 18.260.070(A) authorizes the review authority to require certain design provisions for those lots located adjacent to the existing subdivision.

The applicability of those provisions is evaluated using the definitions contained within the PMC and through the City's development review process. This interpretation does not alter the definitions of "abutting" or "adjacent" contained within the PMC.

Determination of whether a proposed PRD satisfies the applicable standards is made through the City's review process based upon the full development proposal and the record established during that review.

3. *Relationship Between PMC 18.260.070(A) and PMC 18.260.070(B)*

PMC 18.260.070(B) establishes requirements for perimeter screening where a PRD abuts existing residential zones. Subsection (B) expressly states that these screening provisions apply "in addition to subsection A."

Because subsection (B) is written as an additional requirement, it does not replace, eliminate, or supersede the design consistency requirement contained in subsection (A). Instead, the provisions operate together within the PRD design framework established by Chapter 18.260.

Accordingly:

- Compliance with subsection (B) does not substitute for compliance with subsection (A);
- Screening measures required or authorized under subsection (B) do not independently satisfy the consistency requirement established by subsection (A); and
- The presence of screening features, open-space tracts, landscaping, fencing, or other buffering measures does not render subsection (A) inapplicable where the adjacency provisions of the code otherwise apply.

Each subsection establishes separate requirements, and compliance with one provision does not eliminate the applicability of another unless expressly stated in the code. This interpretation is consistent with the March 30, 2026, Administrative Interpretation, which concluded that subsection (B) establishes requirements that apply in addition to subsection (A).

4. *Interpretation of "General Characteristics"*

PMC 18.260.130 provides that applications for PRDs shall contain the submittal requirements identified in the applicable application forms. PRDs involving the creation of lots are also subject to applicable preliminary subdivision submittal requirements.

The March 30, 2026, Administrative Interpretation clarified that preliminary plans are conceptual in nature and are intended to demonstrate the proposed layout and general characteristics of development features so that their relationship to surrounding properties and site design can be evaluated during the review process.

Neither PMC 18.260.130 nor the applicable preliminary subdivision submittal requirements define the phrase "general characteristics."

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Consistent with the March 30, 2026, interpretation, preliminary subdivision plans are intended to provide sufficient information regarding the proposed location and general nature of development features to facilitate review at the preliminary stage of the approval process.

Detailed engineering design, structural calculations, construction specifications, and other technical information are typically addressed during subsequent grading permit and civil plan review.

Accordingly, the phrase "general characteristics," as applied to preliminary plans, refers to the conceptual information necessary to understand the proposed feature and evaluate its relationship to the overall site design during preliminary review. Consistent with the March 30, 2026, Administrative Interpretation, detailed engineering design, structural specifications, and construction details are typically addressed during subsequent grading permit and civil plan review.

Conclusion:

PMC 18.260.070(A) establishes a single regulatory standard requiring that a PRD be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter. The PMC does not establish separate regulatory standards for "consistency" and "compatibility" within this provision.

The consistency requirement applies to the portion of the PRD where adjacency exists and does not require that every individual lot within the PRD be adjacent to the existing subdivision.

PMC 18.260.070(B) establishes screening requirements that apply in addition to the design consistency requirement contained in subsection (A). Screening measures do not replace or substitute for compliance with subsection (A), and the presence of screening features does not eliminate the applicability of subsection (A) where adjacency otherwise exists.

PMC 18.260.130 and the applicable preliminary subdivision submittal requirements require conceptual information sufficient to evaluate proposed development features during preliminary review. Preliminary plans are intended to demonstrate the general layout and characteristics of proposed development, while detailed engineering design and construction specifications are typically addressed during subsequent permit review.

Determination of whether a proposed PRD satisfies the applicable provisions of PMC Chapter 18.260 is made through the City's discretionary development review process. Planning staff conduct the technical review of the application and provide analysis and recommendations, and the Hearing Examiner serves as the decision-making authority who evaluates the full record and determines whether the proposal satisfies the applicable provisions of the Poulsbo Municipal Code.

This administrative interpretation clarifies the meaning and application of the relevant provisions of the Poulsbo Municipal Code and does not constitute a determination regarding whether any specific development proposal satisfies those provisions.

This interpretation is intended to provide additional clarification regarding the application of the relevant provisions of the PMC and should be read in conjunction with the March 30, 2026, Administrative Interpretation. Except as expressly clarified herein, the interpretations contained within the March 30, 2026, Administrative Interpretation remain unchanged.

Authority:

PMC 18.300.020 authorizes the Planning Director to make administrative determinations and interpretations regarding the application of provisions of Title 18. Such determinations must be consistent with the spirit and intent of the Poulsbo Municipal Code and the Comprehensive Plan.

Formal interpretations issued by the Planning Director are maintained by the Planning and Economic Development Department and serve as guidance for the consistent administration of the City's development regulations.

Appeal:

The decision is final. This decision may be appealed to the Hearing Examiner within 14 days. The written appeal, appeal fee, and deposit must be received by the PED department no later than 4:30 p.m. on Monday, July 6, 2026.

Signed by:
Heather Wright
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Heather Wright, AICP, Planning and Economic Development Director — 6/22/2026 Date

January 31, 2026

Ms. Nikole Coleman
Planning Manager
Planning and Economic Development Department
City of Poulsbo
200 NE Moe Street
Poulsbo, WA 98370

RE: Proposed Pinnacle at Liberty Bay PRD – Application of Poulsbo Municipal Code Section 18.260.070 Planned residential development site design criteria.

Dear Ms. Coleman,

We submit these comments during the ongoing staff review of the Pinnacle at Liberty Bay Planned Residential Development (PRD). Because the application remains under staff review and prior to any Planning Commission meeting being scheduled, we believe this is the appropriate stage to ensure that PMC 18.260.070 is applied in a manner that is textually correct, internally coherent and faithful to the purpose of the PRD framework.

1. Project-Level Adjacency Triggers PMC 18.260.070(A)

Chapter 18.40 of the PMC defines "adjacent" as "abutting or located directly across a street right-of-way." The first sentence of PMC 18.260.070(A) applies "when a PRD is proposed adjacent to an existing single-family residential zone which has been developed utilizing traditional city subdivision development standards and lot sizes (seven thousand five hundred square feet or larger)."

This determination is made at the project level, not on a lot-by-lot basis. The Pinnacle PRD undisputedly abuts the Crystal View subdivision along its western and southern boundaries. Accordingly, the mandatory requirement in the first sentence of subsection (A)—that the PRD be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter—clearly applies.

2. Lot-Level Adjacency Is Relevant Only to Discretionary Implementation

The second sentence of PMC 18.260.070(A) addresses the review authority's discretionary ability to require specific design provisions (e.g., matching lot sizes, lot widths, house height and scale) for adjacent lots as a means of achieving the consistency mandated by the first sentence.

Even where internal tracts or buffers may affect which individual PRD lots are "adjacent" for purposes of that discretionary authority, such circumstances do not eliminate or diminish the mandatory, project-level obligation established by the first sentence. Conflating these two analytical steps risks allowing limits on discretionary enforcement to nullify a mandatory design standard.

3. Screening Under Subsection (B) Is "In Addition To," Not a Substitute For, Subsection (A)

PMC 18.260.070(B) expressly states that perimeter screening requirements apply "in addition to subsection A." Screening measures such as fencing, landscaping and buffer tracts therefore cannot be used as a basis for concluding that subsection (A) does not apply. Rather, they are intended to mitigate impacts while the PRD's design independently achieves the mandatory consistency required by subsection (A).

4. Applicant Responsibility; Review Authority's Evaluative Role

For clarity, our comments do not hinge on competing definitions of the term "adjacent," nor do they assume that the review authority must prescribe specific design changes. Chapter 18.40 defines adjacency, and the Pinnacle PRD abuts the Crystal View subdivision, thereby triggering the mandatory, project-level design obligation in the first sentence of PMC 18.260.070(A). The second sentence provides to the review authority discretionary tools for implementation where lot-level adjacency exists, but it does not define or limit the applicability of the underlying standard, nor does it obligate the review authority to exercise its discretion to require the PRD to make any provisions. The absence of prescriptive standards in subsection (A) does not relieve the Applicant of its responsibility to submit a proposal that achieves consistency; it places the burden of demonstrating compliance squarely on the Applicant, subject to evaluation by the review authority.

5. Appendix A – Perimeter Consistency Analysis

To assist staff review, we have attached Appendix A, which documents objective lot-pattern and density conditions along the western and southern boundaries of the Crystal View subdivision where the Pinnacle PRD abuts our neighborhood. The Appendix is offered to support staff's evaluation of any evidence the Applicant for the proposed Pinnacle project has or may place on the record for the purpose of demonstrating design consistency under PMC 18.260.070(A).

6. Context of Prior Public Input

For context, concerns regarding adjacency, perimeter design consistency and the application of PMC 18.260.070 have been raised by Crystal View residents at multiple points during the review process, including during the formal public comment period and in subsequent written correspondence provided to staff. The analysis presented here reflects a refinement and clarification of those earlier concerns, informed by the Applicant's responses and the evolution of the application materials now in the record.

7. Dispute Resolution

In reviewing the Applicant's Technical Review No. 1 Response Letter, we note that Item 21 reflects the Applicant's reliance on formal statutory vesting arguments and its preparedness to employ legal counsel to resolve interpretive disputes. All parties of record with respect to the Pinnacle PRD application accordingly are now on notice. We raise this not to contest vesting doctrine, but to emphasize the importance of careful and explicit findings with respect to PMC 18.260.070.

Where an applicant advances narrow interpretations of code terms—such as "adjacent" or "consistent"—that materially affect whether mandatory design criteria apply or have been applied, it is particularly important that staff analysis and any future recommendations clearly explain how those terms are being interpreted and applied, and how the subsections of PMC 18.260.070 are being read together as a coherent whole.

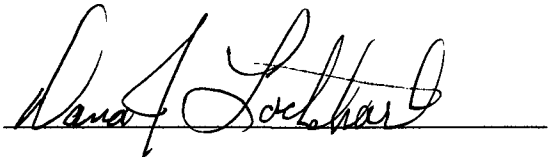
Clear staff analysis at this stage will assist the Planning Commission and Hearing Examiner in understanding the basis for any findings regarding compliance and will help ensure that the record reflects the City's accurate and scrupulous interpretation and application of the PMC.

8. Request for Explicit Staff Analysis

We respectfully request that staff address the application of PMC 18.260.070 explicitly at this stage, including a clear explanation of how project-level adjacency is being applied and how the Pinnacle PRD design consistency is being evaluated, before the application proceeds further.

Thank you for your consideration and for the opportunity to provide input during staff review.

Sincerely,





Dana Lockhart

Katharine Lockhart

1780 NE Crystal View Ct., Poulsbo, WA

APPENDIX A

Perimeter Consistency Analysis – Pinnacle at Liberty Bay PRD vs. Crystal View Subdivision

(For Use with PMC 18.260.070(A))

Context: Pinnacle at Liberty Bay PRD – Staff Review / Planning Commission Review

Purpose of This Appendix

This Appendix provides objective, site-specific facts regarding the physical relationship between the proposed Pinnacle at Liberty Bay PRD and the existing Crystal View subdivision, for use in evaluating compliance by the Pinnacle PRD with the express provisions of PMC 18.260.070(A).

It is intended to supplement narrative comments by documenting lot pattern, density, orientation, and spatial relationships along the western and southern boundaries of Crystal View where the Pinnacle PRD abuts Crystal View. See attached civil plan drawings from the Pinnacle PRD application showing adjacency of the Pinnacle PRD to the Crystal View subdivision.

The elements described in this Appendix A must be considered when defining the single-family residential environment where segments of the Pinnacle PRD are adjacent to the Crystal View subdivision.

Subdivision Name	**Crystal View**	**Pinnacle at Liberty Bay**	Comment – Pinnacle compared to Crystal View
Poulsbo Municipal Code - zoning and development type	Zoned Residential Low Traditional	Zoned Residential Low Planned Residential Development (PRD)	
Type of housing	Single-Family Homes	Single-Family Homes	
Number of homes	46	148 (proposed)	More than 3 times larger
Lot sizes (sq. ft.)	Largest: 10,487 Smallest: 7,500 Average: 8,220	Largest: 7,035 Smallest: 3,758 Average: 4,455	33% smaller 50% smaller 44% smaller
Number of lots abutting or facing the other subdivision	**10**	**22**	More than 2 time greater
Average lot size – lots abutting or facing other subdivision	8,471 sq. ft.	4,620 sq. ft.	45% smaller

Conditions at western boundary of Crystal View where the Pinnacle PRD is adjacent to Crystal View			
Subdivision Name	**Crystal View**	**Pinnacle at Liberty Bay**	Comment – Pinnacle compared to Crystal View
Length of boundary	880 ft.	880 ft.	
Number of residential lots and average size	**7** – Average size: 8,545 sq. ft.	**14** – Average size: 4,794 sq. ft.	Twice as many lots. 44% smaller
Lot numbers of lots facing other subdivision (north to south)	19, 46, 45, 44, 43, 41, 39 (Lot 39 is at intersection of western and southern boundaries)	57, 58, 59, 60, 61, 62, 63, 64, 67, 68, 69, 70, 71, 82	
Number of internal streets – (width in feet)	One – Crystalia Ct. (50 ft.) Joins Road A at Pinnacle PRD	One – Road A (45 ft.) Joins Crystalia Ct. at Crystal View	
Number of other access tracts	None	Tract N (22 ft. wide)	
Lots presenting narrowest dimension toward other subdivision	**3** (Lots 46, 45, 44)	**10** (Lots 59, 60, 61, 62, 63, 64, 67, 68, 69, 70)	Massing of narrow PRD lots facing conventional wider lots.
Average width for those lots	96.7 ft.	46.6 ft.	52% narrower
Lot setbacks – Side	5 ft. minimum - per Poulsbo Municipal Code 18.70.050	5 ft. typical - per Pinnacle PRD civil plans	Homes only 10 feet apart
Example: Lockhart Lot – No. 44	Lot size – 9,800 sq. ft. Rear property line: 114.4 ft. wide	Average for 14 lots: 4,794 Avg. width for 10 lots: 46.6 ft.	51% smaller 59% narrower

Conditions at southern boundary of Crystal View where the Pinnacle PRD is adjacent to Crystal View			
Subdivision Name	**Crystal View**	**Pinnacle at Liberty Bay**	Comment – Pinnacle compared to Crystal View
Length of boundary	494 ft.	494 ft.	
Number of residential lots and average size	**4** – Average size: 8,100 sq. ft.	**8** – Average size: 4,313 sq. ft.	Twice as many lots. 47% smaller
Lot numbers of lots facing the other subdivision (west to east)	39, 38, 37, 11 (Lot 39 is at intersection of western and southern boundaries)	42, 43, 44, 45, 46, 47, 48, 49	
Number of internal streets	One - Sunrise Ridge Ave.	One - Sunrise Ridge Ave.	Street bisects both subdivisions
Lots presenting narrowest dimension toward other subdivision	**3** (Lots 39, 38. 37)	**8** (Lots 42, 43, 44, 45, 46, 47, 48, 49)	Massing of narrow PRD lots facing conventional wider lots.
Average width for those lots	65.4 ft.	50.4 ft.	23% narrower
Lot setbacks – Side	5 ft. minimum - per Poulsbo Municipal Code 18.70.050	5 ft. typical - per Pinnacle PRD civil plans	Homes only 10 feet apart

Prepared by: Dana Lockhart & Katharine Lockhart -- Property: 1780 NE Crystal View Ct., Poulsbo, WA

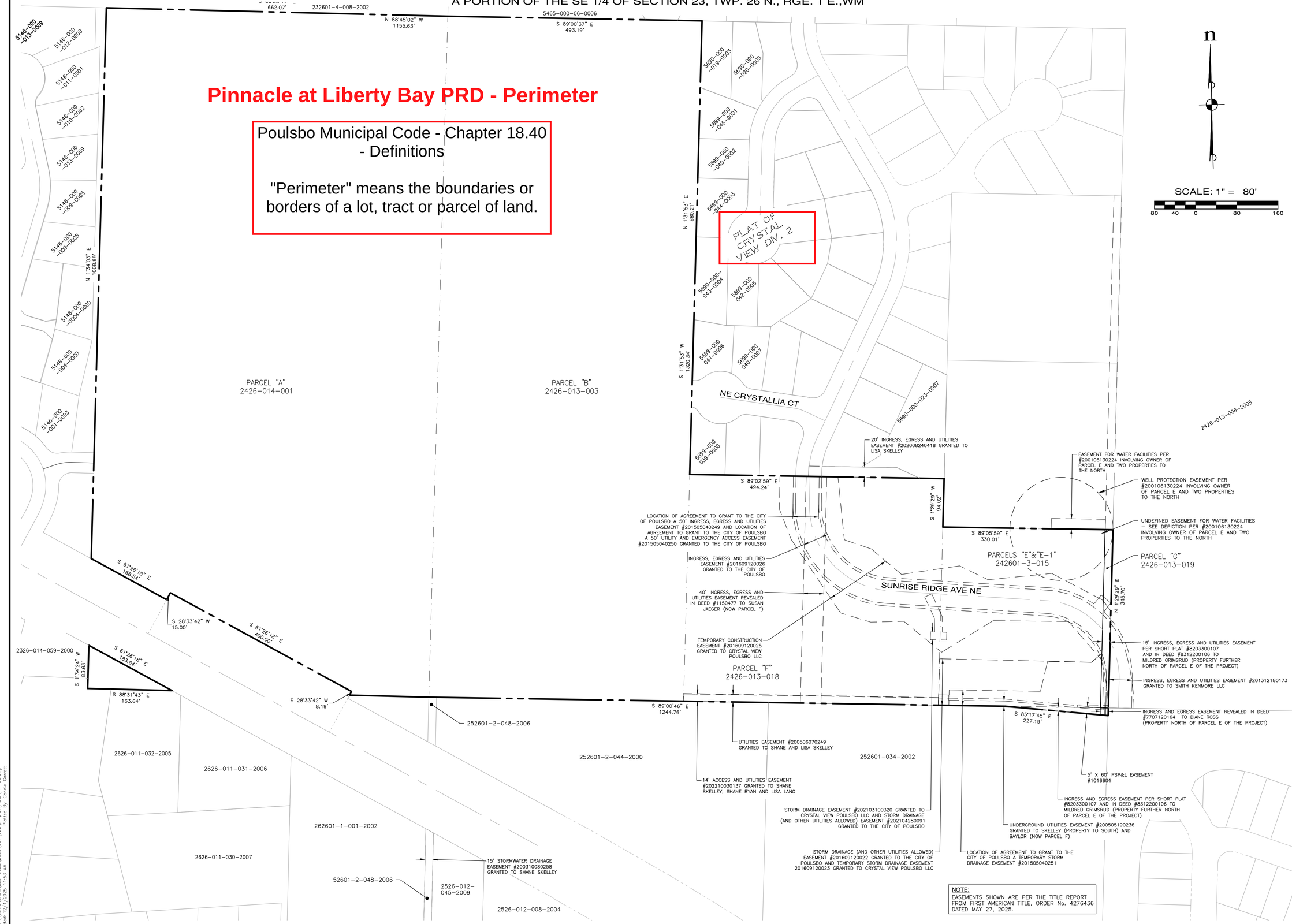
Data sources: Pinnacle at Liberty Bay PRD civil plans submitted with application; Crystal View civil plans on file with City of Poulsbo; Poulsbo Municipal Code

A PORTION OF THE SE 1/4 OF SECTION 23, TWP. 26 N., RGE. 1 E.,WM

Pinnacle at Liberty Bay PRD - Perimeter

Poulsbo Municipal Code - Chapter 18.40 - Definitions

"Perimeter" means the boundaries or borders of a lot, tract or parcel of land.



NOTE:
EASEMENTS SHOWN ARE PER THE TITLE REPORT FROM FIRST AMERICAN TITLE, ORDER No. 4276436 DATED MAY 27, 2025.

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Plotted By: Connie Garrett

REVISIONS

NO.	DESCRIPTION/DATE	BY

BRANSON MICHAEL LONGMIRE — STATE OF WASHINGTON — 50085 — REGISTERED PROFESSIONAL ENGINEER
12/01/2025

CONSULTING ENGINEERS LLC
33400 8th Ave S, Suite 205
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MONTEBANC MANAGEMENT, LLC

PINNACLE AT LIBERTY BAY SUBDIVISION — WASHINGTON

BOUNDARY CONDITIONS

CITY OF POULSBO

JOB NO.:	2090-004-022
DWG. NAME:	PP-05
DESIGNED BY:	
DRAWN BY:	
CHECKED BY:	
DATE:	11/26/2025
DATE OF PRINT:	

PP-05

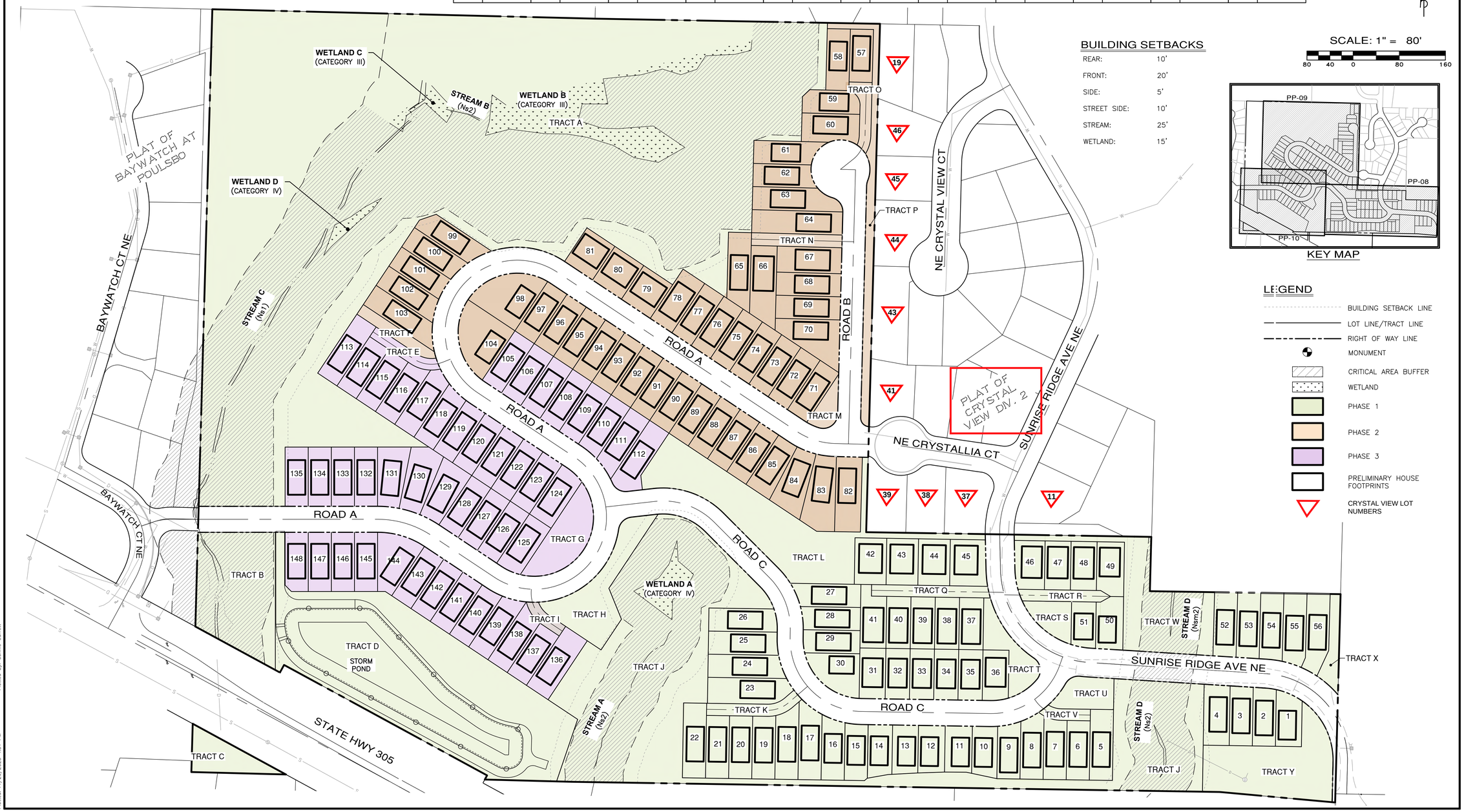
5 OF 32 SHEETS

A PORTION OF THE SE 1/4 OF SECTION 23, TWP. 26 N., RGE. 1 E.,WM

TRACT AREA TABLE			
TRACT	USE	OWNERSHIP	AREA (SF)
A	OPEN SPACE	HOA	514,511
B	OPEN SPACE	HOA	27,408
C	OPEN SPACE	HOA	6,842
D	STORMWATER	CITY	94,659
E	ACCESS/UTILITY	HOA	2,578
F	RECREATION	HOA	2,969
G	RECREATION	HOA	9,478
H	RECREATION	HOA	13,908
I	ACCESS/UTILITY	HOA	1,482
J	OPEN SPACE	HOA	133,489
K	ACCESS/UTILITY	HOA	3,487
L	OPEN SPACE	HOA	35,621
M	OPEN SPACE	HOA	2,535

TRACT AREA TABLE			
TRACT	USE	OWNERSHIP	AREA (SF)
N	ACCESS/UTILITY	HOA	3,453
O	ACCESS/UTILITY	HOA	2,761
P	OPEN SPACE	HOA	10,285
Q	ACCESS/UTILITY	HOA	4,062
R	ACCESS/UTILITY	HOA	2,969
S	OPEN SPACE	HOA	4,081
T	RECREATION	HOA	6,478
U	RECREATION	HOA	5,209
V	ACCESS/UTILITY	HOA	1,661
W	OPEN SPACE	HOA	22,900
X	ACCESS/UTILITY	HOA	3,528
Y	OPEN SPACE W/PUBLIC STORM EASEMENT	HOA	22,234

LOT AREA TABLE																							
LOT #	AREA (S.F.)	LOT #	AREA (S.F.)	LOT #	AREA (S.F.)	LOT #	AREA (S.F.)	LOT #	AREA (S.F.)	LOT #	AREA (S.F.)	LOT #	AREA (S.F.)	LOT #	AREA (S.F.)	LOT #	AREA (S.F.)	LOT #	AREA (S.F.)	LOT #	AREA (S.F.)	LOT #	AREA (S.F.)
1	4068	14	3759	27	4476	40	3780	54	4614	68	4477	81	4064	94	4100	107	4100	120	4100	133	4100	146	4100
2	4011	15	3895	28	4015	41	4420	55	4871	69	4477	82	5825	95	4100	108	4100	121	4100	134	4100	147	4100
3	4095	16	4220	29	3916	42	4429	56	5209	70	6263	83	6303	96	4100	109	4100	122	4100	135	4100	148	4041
4	4697	17	5052	30	5408	43	4427	57	3669	71	4098	84	5274	97	4100	110	4143	123	4100	136	5512		
5	4903	18	4801	31	3937	44	4425	59	3851	72	4100	85	4439	98	7739	111	4526	124	4542	137	4100		
6	4104	19	4353	32	3675	45	5015	60	4832	73	4100	86	4100	99	4610	112	5340	125	4542	138	4346		
7	4175	20	4345	33	3675	46	4326	61	4386	74	4100	87	4100	100	4212	113	4900	126	4100	139	4471		
8	4338	21	4345	34	3675	47	3799	62	4132	75	4100	88	4100	101	4073	114	4100	127	4100	140	4131		
9	3770	22	5185	35	3675	48	3798	63	5615	76	4100	89	4100	102	4383	115	4100	128	4100	141	4100		
10	3760	23	6188	36	3891	49	4305	64	6277	77	4100	90	4100	103	5233	116	4215	129	4980	142	4100		
11	3760	24	5122	37	3780	51	3327	65	5076	78	4613	91	4100	104	7739	117	4676	130	5406	143	4100		
12	3754	25	4786	38	3780	52	4446	66	5923	79	4200	92	4100	105	4100	118	4232	131	4980	144	5716		
13	3753	26	4680	39	3780	53	4521	67	5037	80	4200	93	4100	106	4100	119	4101	132	4100	145	4100		



BUILDING SETBACKS

REAR:	10'
FRONT:	20'
SIDE:	5'
STREET SIDE:	10'
STREAM:	25'
WETLAND:	15'

SCALE: 1" = 80'

80 40 0 80 160

KEY MAP

LEGEND

- BUILDING SETBACK LINE
- LOT LINE/TRACT LINE
- RIGHT OF WAY LINE
- MONUMENT
- CRITICAL AREA BUFFER
- WETLAND
- PHASE 1
- PHASE 2
- PHASE 3
- PRELIMINARY HOUSE FOOTPRINTS
- CRYSTAL VIEW LOT NUMBERS

REVISIONS

NO.	DESCRIPTION/DATE	BY

BRANDON MICHAEL LOUDON
STATE OF WASHINGTON
50085
REGISTERED
PROFESSIONAL ENGINEER
12/01/2025

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MONTEBANC MANAGEMENT, LLC

PINNACLE AT LIBERTY BAY SUBDIVISION

CITY OF POULSBO WASHINGTON

OVERALL SITE PLAN & LOT/TRACT PHASING PLAN

JOB NO.:	2090-004-022
DWG. NAME:	PP-07
DESIGNED BY:	
DRAWN BY:	
CHECKED BY:	
DATE:	11/26/2025
DATE OF PRINT:	

PP-07

7 OF 32 SHEETS

File: \\esm8\engr\ESM-0085\2090\004\022\P-plat\Plats\PP-07.dwg
Plotted: 11/26/2025 4:51 PM Plotted By: Connor Garrett

APPENDIX A-2

Perimeter Consistency Analysis – Pinnacle at Liberty Bay PRD vs. Crystal View Subdivision

"18.260.070 Planned residential development site design criteria.

A. When a PRD is proposed adjacent to an existing single-family residential zone which has been developed utilizing traditional city subdivision development standards and lot sizes (seven thousand five hundred square feet or larger), the PRD shall be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter. The review authority may require the PRD to make provisions such as matching lot sizes, lot widths or house height and scale (or other provisions as deemed appropriate) for those lots that are located adjacent to the existing subdivision. Further, any proposed attached units shall be clustered and located away from the established single-family subdivision."

Purpose of This Appendix A-2

This Appendix A-2 provides objective, site-specific facts regarding the physical relationship between the proposed Pinnacle at Liberty Bay PRD and the existing Crystal View subdivision, for use in evaluating compliance by the Pinnacle PRD with the express provisions of PMC 18.260.070(A).

It is intended to supplement narrative comments by documenting lot pattern, density, orientation, and spatial relationships along the western and southern boundaries of Crystal View where the Pinnacle PRD abuts Crystal View. See attached civil plan drawings from the Pinnacle PRD application showing adjacency of the Pinnacle PRD to the Crystal View subdivision.

The physical and spatial factors described in this Appendix A-2 are relevant to evaluating the single-family residential environment presented at those portions of the Pinnacle PRD that are adjacent to the Crystal View subdivision.

APPENDIX A-2

Subdivision Name	**Crystal View**	**Pinnacle at Liberty Bay**	Comment – Pinnacle compared to Crystal View
Poulsbo Municipal Code - zoning and development type	Zoned Residential Low Traditional	Zoned Residential Low Planned Residential Development (PRD)	Same Smaller lot areas, reduced lot width and depth, closer spacing.
Type of housing	Single-Family Homes	Single-Family Homes	
Number of homes	46	138 (proposed)	3 times larger
Lot sizes (sq. ft.)	Largest: 10,487 Smallest: 7,500 Average: 8,220	Largest: 6,751 Smallest: 3,756 Average: 4,415	36% smaller 50% smaller 46% smaller
Number of lots abutting or facing the other subdivision	**10**	**22**	More than 2 times greater
Average lot size – lots abutting or facing other subdivision	8,471 sq. ft.	4,589 sq. ft.	45% smaller

APPENDIX A-2

Conditions at western boundary of Crystal View where the Pinnacle PRD is adjacent to Crystal View			
Subdivision Name	**Crystal View**	**Pinnacle at Liberty Bay**	Comment – Pinnacle compared to Crystal View
Length of boundary	880 ft.	880 ft.	
Number of residential lots and average size	**7** – Average size: 8,545 sq. ft.	**14** – Average size: 4,803 sq. ft.	Twice as many lots. 44% smaller
Lot numbers of lots facing other subdivision (north to south)	19, 46, 45, 44, 43, 41, 39 (Lot 39 is at intersection of western and southern boundaries)	55, 56, 57, 58, 59, 60, 61, 62, 65, 66, 67, 68, 69, 80	
Number of internal streets – (width in feet)	One – Crystalia Ct. (50 ft.) Joins Road A at Pinnacle PRD	One – Road A (45 ft.) Joins Crystalia Ct. at Crystal View	
Number of other access tracts	None	Tract H (22 ft. wide)	
Lots presenting narrowest dimension toward other subdivision	**3** (Lots 46, 45, 44)	**10** (Lots 57, 58, 59, 60, 61, 62, 65, 66, 67, 68)	Massing of narrow PRD lots facing conventional wider lots.
Average width for those lots	96.7 ft.	46.7 ft.	52% narrower
Lot setbacks – Side	5 ft. minimum - per Poulsbo Municipal Code 18.70.050	5 ft. typical - per Pinnacle PRD civil plans	Homes only 10 feet apart
Example: Lockhart Lot – No. 44	Lot size – 9,800 sq. ft. Rear property line: 114.4 ft. wide	Average for 14 lots: 4,803 sq.ft. Avg. width for 10 lots: 46.7 ft.	51% smaller 59% narrower

APPENDIX A-2

Conditions at southern boundary of Crystal View where the Pinnacle PRD is adjacent to Crystal View			
Subdivision Name	**Crystal View**	**Pinnacle at Liberty Bay**	Comment – Pinnacle compared to Crystal View
Length of boundary	494 ft.	494 ft.	
Number of residential lots and average size	**4** – Average size: 8,100 sq. ft.	**8** – Average size: 4,214 sq. ft.	Twice as many lots. 48% smaller
Lot numbers of lots facing the other subdivision (west to east)	39, 38, 37, 11 (Lot 39 is at intersection of western and southern boundaries)	41, 42, 43, 44, 45, 46, 47, 48	
Number of internal streets	One - Sunrise Ridge Ave.	One - Sunrise Ridge Ave.	Street bisects both subdivisions
Lots presenting narrowest dimension toward other subdivision	**3** (Lots 39, 38. 37)	**8** (Lots 41, 42, 43, 44, 45, 46, 47, 48)	Massing of narrow PRD lots facing conventional wider lots.
Average width for those lots	65.4 ft.	48.5 ft.	26% narrower
Lot setbacks – Side	5 ft. minimum - per Poulsbo Municipal Code 18.70.050	5 ft. typical - per Pinnacle PRD civil plans	Homes only 10 feet apart

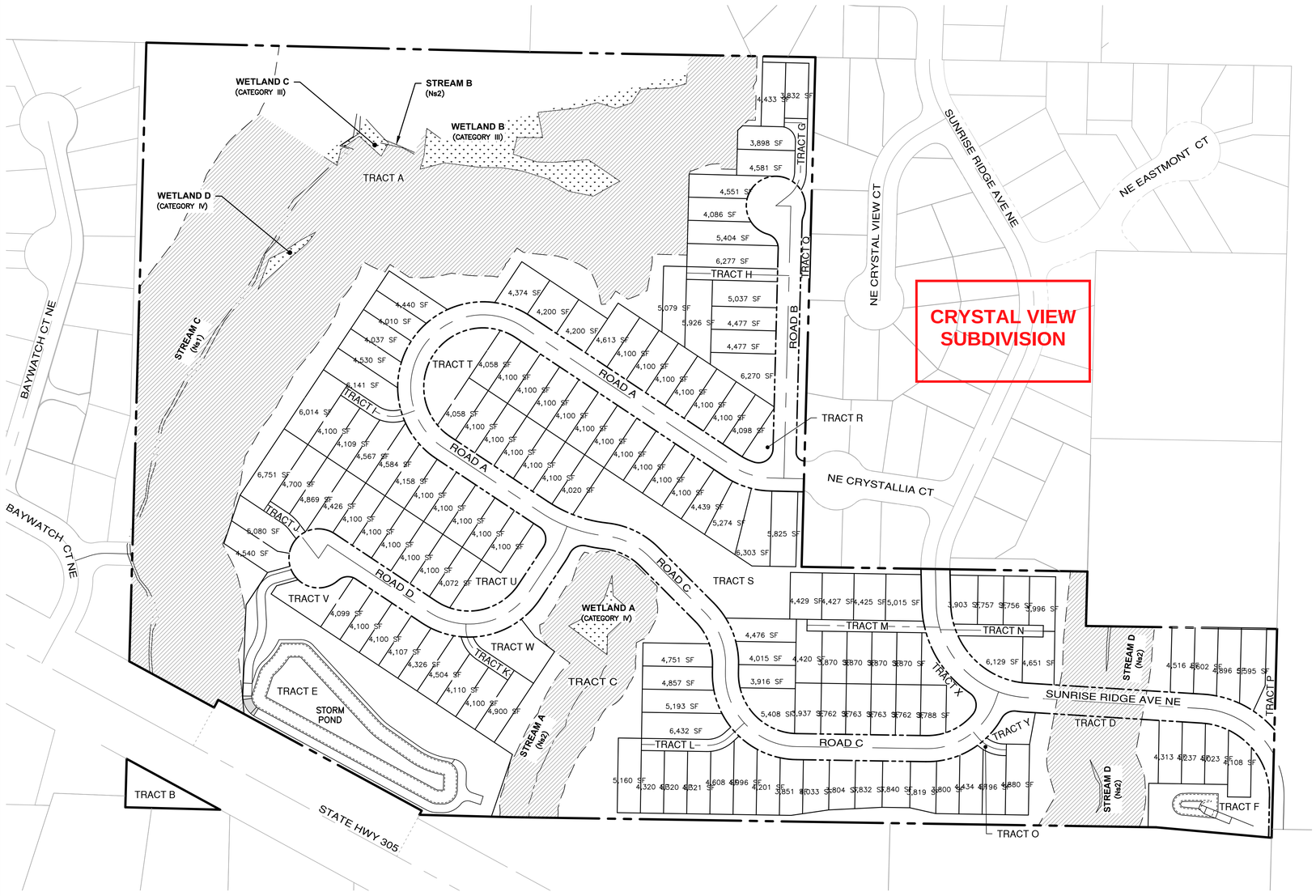
Prepared by: Dana Lockhart & Katharine Lockhart -- Property: 1780 NE Crystal View Ct., Poulsbo, WA

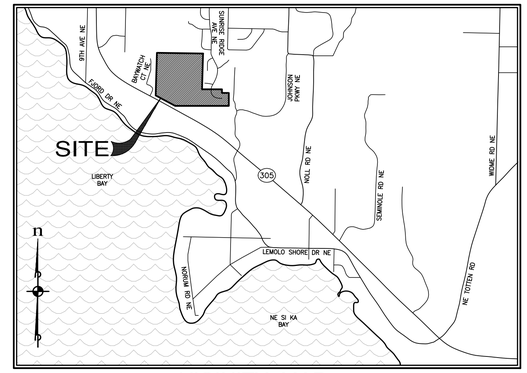
Data sources: Pinnacle at Liberty Bay PRD civil plans dated 4/09/2026; Crystal View civil plans on file with City of Poulsbo; Poulsbo Municipal Code

A PORTION OF THE SE 1/4 OF SECTION 23, TWP. 26 N., RGE. 1 E.,WM

PINNACLE AT LIBERTY BAY

PRELIMINARY PLAT





VICINITY MAP
NOT TO SCALE

n

SCALE: 1" = 100'
100 50 0 100 200

SHEET INDEX

Dwg.	Description
PP-01	COVER SHEET
PP-02 – PP-04	EXISTING CONDITIONS
PP-05	BOUNDARY CONDITIONS
PP-06	BUFFER MITIGATION PLAN
PP-07	OVERALL SITE PLAN & LOT/TRACT PHASING PLAN
PP-08 – PP-10	PRELIMINARY SITE PLANS
PP-11	PRELIMINARY TESC PLAN
PP-12 – PP-14	PRELIMINARY GRADING PLANS
PP-15	OVERALL INFRASTRUCTURE PLAN
PP-16	INFRASTRUCTURE PLAN – PHASE 1
PP-17	INFRASTRUCTURE PLAN – PHASE 2
PP-18	INFRASTRUCTURE PLAN – PHASE 3
PP-19 – PP-21	PRELIMINARY ROAD & UTILITY PLANS
PP-22	PRELIMINARY POND E LAYOUT
PP-23	PRELIMINARY POND E SECTIONS
PP-24	PRELIMINARY POND F PLAN & SECTIONS
PP-25	OFFSITE SEWER CONNECTION/CROSSING PLAN & PROFILE
PP-26	STREAM "A" SEWER CROSSING PLAN & PROFILE
PP-27	CHANNELIZATION AND SIGNAGE PLAN
PP-28 – PP-30	PRELIMINARY LANDSCAPE PLANS
PP-31	PRELIMINARY OPEN SPACE PLAN

PROJECT TEAM

OWNER/DEVELOPER
MONTEBANC MANAGEMENT, LLC
400 NW GILMAN BLVD. #2781
ISSAQUAH, WA 98027
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PHONE: (206) 391-8366

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TRAFFIC ENGINEER
HEATH & ASSOCIATES
1011 E MAIN AVE, STE 453
PUYALLUP, WA 98372
CONTACT: AARON VAN AKEN
PHONE: (253) 859-0515

SITE STATISTICS

NUMBER OF LOTS:	138
LOTS PER GROSS ACRE:	3.65/ACRE
TOTAL SITE AREA:	1,803.847 SF (41.41 ACRES)
SITE ADDRESS:	ADDRESS NOT ASSIGNED
PARCEL NUMBER(S):	2326-014-001-2009
	2426-013-003-2008
	2426-013-018-2001
	2426-013-005-2006
	2426-013-019-2000
LOT SIZE:	
LARGEST LOT:	6,751 SF
SMALLEST LOT:	3,756 SF
AVERAGE LOT:	4,415 SF
SEWERAGE SYSTEM:	CITY OF POULSBO
WATER SUPPLY:	CITY OF POULSBO
FIRE DISTRICT:	CITY OF POULSBO

REVISIONS

NO.	DESCRIPTION/DATE	BY

BRANDON MICHAEL LAUER
STATE OF WASHINGTON
50085
REGISTERED
PROFESSIONAL ENGINEER
04/10/2026

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MONTEBANC MANAGEMENT, LLC

PINNACLE AT LIBERTY BAY SUBDIVISION

COVER SHEET

CITY OF POULSBO WASHINGTON

JOB NO.:	2090-004-022
DWG. NAME:	PP-01
DESIGNED BY:	
DRAWN BY:	
CHECKED BY:	
DATE:	04/09/2026
DATE OF PRINT:	

PP-01

1 OF 31 SHEETS

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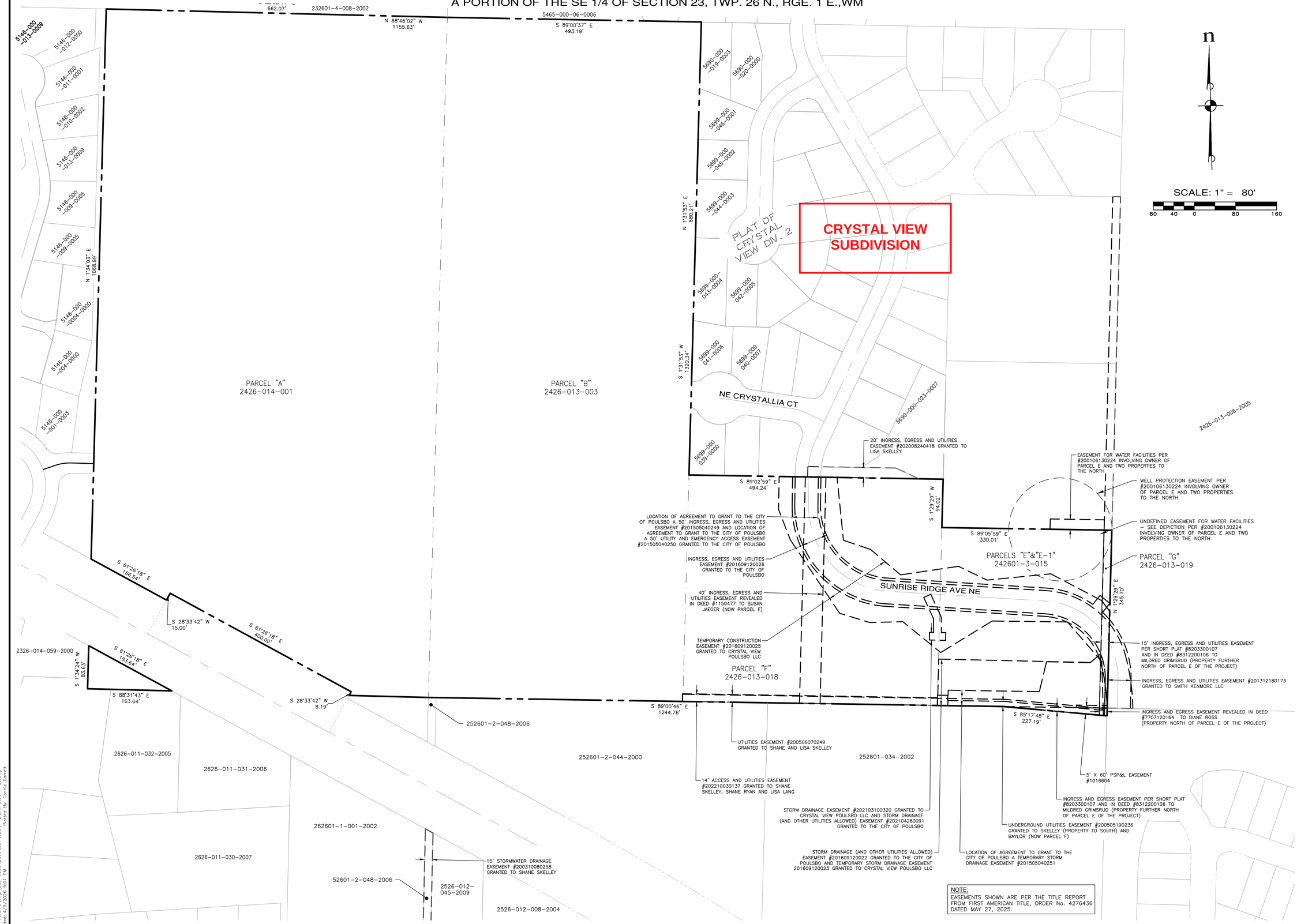
Plotted By: Connie Garrett

A PORTION OF THE SE 1/4 OF SECTION 23, TWP. 26 N., RGE. 1 E.,WM



NOTE:
EASEMENTS SHOWN ARE PER THE TITLE REPORT FROM FIRST AMERICAN TITLE, ORDER No. 4276436 DATED MAY 27, 2025.

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Plotted: 4/9/2026 5:01 PM
Plotted By: Connie Garrett

REVISIONS

NO.	DESCRIPTION/DATE	BY

BRANSON MICHAEL LOOMIS
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PROFESSIONAL ENGINEER
04/10/2026

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PINNACLE AT LIBERTY BAY SUBDIVISION

BOUNDARY CONDITIONS

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DWG. NAME:	PP-05
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DATE OF PRINT:	

PP-05

5 OF 31 SHEETS

John Warwood
17796 Sunrise Ridge Ave NE
Poulsbo, WA 98370

June 23, 2026

Planning Commission and City Staff
City of Poulsbo
200 NE Moe Street
Poulsbo, WA 98370

Subject: Pinnacle at Liberty Bay PRD (Permit # P-06-20-25-03)

Dear Commissioners and Staff:

The purpose of this letter is to provide written comments regarding the subject PRD proposal. I am a resident of the Crystal View neighborhood. My comments are as follows:

1. **Impact on public safety:**
    a. I recently learned that the proposed entrance to the Pinnacle project through the Bay Watch neighborhood has been pulled from the plan. This will result in increased traffic flow from earlier traffic studies for Sunrise Ridge Avenue. A significant increase in traffic will raise the risk of traffic accidents.
        i. The original TIA seems limited to traffic resulting only from the Pinnacle PRD by forecasting 151 trips at PM peak.
        ii. The original Traffic Impact Analysis (TIA) appears extremely conservative; for example, it does not account for traffic diverting off Hwy. 305 to avoid traffic lights during peak hours.
        iii. It does not assume traffic from Liberty Bay Vista to local schools, etc.
        iv. It does not account for traffic coming from north and east Poulsbo to Sunrise Ridge Avenue to avoid Noll Road.
        v. **Therefore, a new Traffic Impact Analysis for Sunrise Ridge Avenue should be completed prior to making a recommendation to proceed.**
    b. The plan to extend Sunrise Ridge Avenue to connect with the Johnson traffic circle calls for a series of sharp left and right turns on a short stretch of road (none of these curves meet the minimum standard radius of 125'). Moreover, there are several residential driveways, an intersection with Road C, two service roads (tracts M and N serving 15 units) as well as two private roads, all of which will access Sunrise Ridge Ave in a span of less than 1,000 feet. The restricted sight lines and heavy traffic in this area will result in a dangerous stretch of roadway.
    c. The road between the currently gated terminus of Sunrise Ridge Avenue and the traffic circle at the Liberty Bay Vista neighborhood entrance appears to be 11% where Sunrise Ridge intersects service roads to tracts M and N). This grade, in

combination with the "S curves," adjacent streets and driveways will further exacerbate the potential for traffic accidents.

2. **Strict Adherence to Poulsbo Municipal Codes (the following are examples and not to be considered a complete list of Poulsbo Municipal Codes that should be met):**
    a. PMC15.40.070 – Maximum slope for fill surfaces
    b. PMC18.260.120(B) – Maximum number of driveways off a private road
    c. PMC15.35.130 – Damage to adjacent properties due to tree removal and the infrastructure construction process
    d. PMC18.260.070(A) – PRD Site Design Criteria; particularly as it pertains to adjacent properties: As stated in PMC18.260.070 - When a PRD is proposed adjacent to an existing single-family residential zone which has been developed utilizing traditional city subdivision development standards and lot sizes (seven thousand five hundred square feet or larger), the PRD shall be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter.
    e. PMC 18.80.140 (F) states: The proposal would be compatible with existing and future land uses within the general area in which the proposal is to be located by providing screening or buffering between parcels and providing consistency between any existing single-family subdivisions and the proposal.
    f. PMC 18.80.140 (G) states: The proposal would preserve natural features and critical areas and would preserve and incorporate existing stands of trees within the project design as much as possible.
    g. PMC 18.80.140 (I) states: There will be adequate provisions for public access to serve the subject proposal, as well as providing for neighborhood connectivity as appropriate and as required by the City.
        i. *With the elimination of an access point via Bay Watch, both entrances to the proposal are in the same general area and are in very close proximity to each other. As such, does this meet city, county and state standards?*

3. **Impact on existing sub-division property values:**
    a. A substantial increase in traffic, degraded aesthetics, and a more conjested vibe will undoubtedly affect adjacent subdivision home values.
    b. Recent experience suggests that interest in Crystal View properties is already diminished. Specifically, two homes on Crystallia Court have listed and conducted open houses. Neither home had any traffic at their open house. One property owner at 1767 Crystallia Ct. has opted to rent in lieu of selling. The other property (1762 Crystallia) is still on the market and is experiencing little or no potential buyer traffic.

John Warwood
17796 Sunrise Ridge Ave NE
Poulsbo, WA 98370

4. **City and County Municipal Services:** PMC 18.80.140 (H) states: (ensure) there are adequate provisions for water, sanitary sewer, and public utilities (electric, gas, phone) and services to ensure that the proposal would not be detrimental to public health and safety.
    a. Electricity: *Is current network capacity sufficient to meet increased demand?*
    i. The city's plan for additional electrical service from PSE as stated in the 2024 Comprehensive Plan is vague. It states: To meet regional and citywide electric demand, new transmission lines and substations may need to be constructed, in addition, existing facilities will need to be maintained and possibly rebuilt to serve current and future demand. Specific transmission and substation construction that is anticipated in the City of Poulsbo in the next 10 years includes a possible fourth transmission tie from the south to the Foss Corner switching station that may go through city limits.
    b. Water Supply: The City has acknowledged that without significant infrastructure upgrades and potential changes to sourcing, Poulsbo will not have a sufficient source of water as soon as 2029. The city's October 2024 Water System Plan states:
        i. 3.4.3 Projected Annual Withdrawal: "… the City will need to obtain additional rights to meet its projected daily demand prior to 2040. Alternatively, the City would be able to meet average day demand without exceeding the current water right <u>if</u> the water efficiency goals presented in Chapter 6 are fully or partially met." *In short, add more demand and hope for improvements to efficiency.*
        ii. 3.5.2 Source Production Capacity Analysis – Maximum Day Demand (MDD): "The City's sources are projected to be unable to meet the maximum daily demand with 20 hours of pumping beginning in 2029. The City would be able to meet the MDD in 2029 by pumping 20.5 hours per day and transferring water between zones through PRVs, however by 2044 the current sources will be inadequate." *The current plan seems to count on "stressing the system" until it must be addressed*.

5. **Effect on Indigenous Wildlife (re. PMC 18.80.149 (K) states: There will not be significant unmitigated harmful effects upon environmental quality and natural resources.**
    a. A day rarely passes when we don't see bald eagles circling over the proposed Pinnacle site. Bald Eagles are protected under federal law, primarily through the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act, which prohibit harming, disturbing, or possessing eagles, their nests, or parts without a permit.
        i. "Disturb" is defined by 50 CFRS 22.3 as to "agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available:

1. Injury to an eagle
2. Decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or
3. Nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.

ii. "Disturb" includes immediate impacts such as loud noises around the nest that may cause eagles to abandon their eggs or young chicks. A disturbance may also happen if humans change the landscape around the eagle nest. Even if these changes happen outside of the eagle nesting season, the eagle may have future decreased nest success or may abandon the nest if these changes are significant.

iii. Penalties are in place for any found guilty of an offense. Penalties double for an organization. Rewards are provided for information leading to arrest and conviction.

b. Bald eagles are also protected under Washington's Bald Eagle Protection Act (RCW 77.12.655). Key state protections include habitat protection, buffer zones, bald eagle management plans, and cooperative management.
c. In summary, Bald Eagles are protected in Washington by both state and federal laws. Federal law provides broader protections against harassment and harm.
d. Have either the city or the applicant checked for existing eagle habitat?

Finally, the city's recent review comments suggest that substantial questions remain regarding concerns that I have not raised in this letter. I respectfully request that those questions, and the concerns that I have raised, be fully answered and resolved before any recommendation of approval is made.

I am not asking the city to deny development. Rather, I am asking the city to ensure that the Pinnacle PRD Applicant demonstrates compliance with applicable requirements and that all important questions and issues are addressed before the project proceeds in the review process.

Thank you for your consideration.

Respectfully submitted,

John M Warwood
17796 Sunrise Ridge Ave NE
Poulsbo, WA 98370

John Warwood
17796 Sunrise Ridge Ave NE
Poulsbo, WA 98370

June 23, 2026

Planning Commission and City Staff
City of Poulsbo
200 NE Moe Street
Poulsbo, WA 98370

Subject: Pinnacle at Liberty Bay PRD (Permit # P-06-20-25-03)

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The purpose of this letter is to provide written comments regarding the subject PRD proposal. I am a resident of the Crystal View neighborhood. My comments are as follows:

1. **Impact on public safety:**
    a. I recently learned that the proposed entrance to the Pinnacle project through the Bay Watch neighborhood has been pulled from the plan. This will result in increased traffic flow from earlier traffic studies for Sunrise Ridge Avenue. A significant increase in traffic will raise the risk of traffic accidents.
        i. The original TIA seems limited to traffic resulting only from the Pinnacle PRD by forecasting 151 trips at PM peak.
        ii. The original Traffic Impact Analysis (TIA) appears extremely conservative; for example, it does not account for traffic diverting off Hwy. 305 to avoid traffic lights during peak hours.
        iii. It does not assume traffic from Liberty Bay Vista to local schools, etc.
        iv. It does not account for traffic coming from north and east Poulsbo to Sunrise Ridge Avenue to avoid Noll Road.
        v. **Therefore, a new Traffic Impact Analysis for Sunrise Ridge Avenue should be completed prior to making a recommendation to proceed.**
    b. The plan to extend Sunrise Ridge Avenue to connect with the Johnson traffic circle calls for a series of sharp left and right turns on a short stretch of road (none of these curves meet the minimum standard radius of 125'). Moreover, there are several residential driveways, an intersection with Road C, two service roads (tracts M and N serving 15 units) as well as two private roads, all of which will access Sunrise Ridge Ave in a span of less than 1,000 feet. The restricted sight lines and heavy traffic in this area will result in a dangerous stretch of roadway.
    c. The road between the currently gated terminus of Sunrise Ridge Avenue and the traffic circle at the Liberty Bay Vista neighborhood entrance appears to be 11% where Sunrise Ridge intersects service roads to tracts M and N). This grade, in

combination with the "S curves," adjacent streets and driveways will further exacerbate the potential for traffic accidents.

2. **Strict Adherence to Poulsbo Municipal Codes (the following are examples and not to be considered a complete list of Poulsbo Municipal Codes that should be met):**
    a. PMC15.40.070 – Maximum slope for fill surfaces
    b. PMC18.260.120(B) – Maximum number of driveways off a private road
    c. PMC15.35.130 – Damage to adjacent properties due to tree removal and the infrastructure construction process
    d. PMC18.260.070(A) – PRD Site Design Criteria; particularly as it pertains to adjacent properties: As stated in PMC18.260.070 - When a PRD is proposed adjacent to an existing single-family residential zone which has been developed utilizing traditional city subdivision development standards and lot sizes (seven thousand five hundred square feet or larger), the PRD shall be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter.
    e. PMC 18.80.140 (F) states: The proposal would be compatible with existing and future land uses within the general area in which the proposal is to be located by providing screening or buffering between parcels and providing consistency between any existing single-family subdivisions and the proposal.
    f. PMC 18.80.140 (G) states: The proposal would preserve natural features and critical areas and would preserve and incorporate existing stands of trees within the project design as much as possible.
    g. PMC 18.80.140 (I) states: There will be adequate provisions for public access to serve the subject proposal, as well as providing for neighborhood connectivity as appropriate and as required by the City.
        i. *With the elimination of an access point via Bay Watch, both entrances to the proposal are in the same general area and are in very close proximity to each other. As such, does this meet city, county and state standards?*

3. **Impact on existing sub-division property values:**
    a. A substantial increase in traffic, degraded aesthetics, and a more conjested vibe will undoubtedly affect adjacent subdivision home values.
    b. Recent experience suggests that interest in Crystal View properties is already diminished. Specifically, two homes on Crystallia Court have listed and conducted open houses. Neither home had any traffic at their open house. One property owner at 1767 Crystallia Ct. has opted to rent in lieu of selling. The other property (1762 Crystallia) is still on the market and is experiencing little or no potential buyer traffic.

John Warwood
17796 Sunrise Ridge Ave NE
Poulsbo, WA 98370

4. **City and County Municipal Services:** PMC 18.80.140 (H) states: (ensure) there are adequate provisions for water, sanitary sewer, and public utilities (electric, gas, phone) and services to ensure that the proposal would not be detrimental to public health and safety.
    a. Electricity: *Is current network capacity sufficient to meet increased demand?*
    i. The city's plan for additional electrical service from PSE as stated in the 2024 Comprehensive Plan is vague. It states: To meet regional and citywide electric demand, new transmission lines and substations may need to be constructed, in addition, existing facilities will need to be maintained and possibly rebuilt to serve current and future demand. Specific transmission and substation construction that is anticipated in the City of Poulsbo in the next 10 years includes a possible fourth transmission tie from the south to the Foss Corner switching station that may go through city limits.
    b. Water Supply: The City has acknowledged that without significant infrastructure upgrades and potential changes to sourcing, Poulsbo will not have a sufficient source of water as soon as 2029. The city's October 2024 Water System Plan states:
        i. 3.4.3 Projected Annual Withdrawal: "… the City will need to obtain additional rights to meet its projected daily demand prior to 2040. Alternatively, the City would be able to meet average day demand without exceeding the current water right <u>if</u> the water efficiency goals presented in Chapter 6 are fully or partially met." *In short, add more demand and hope for improvements to efficiency.*
        ii. 3.5.2 Source Production Capacity Analysis – Maximum Day Demand (MDD): "The City's sources are projected to be unable to meet the maximum daily demand with 20 hours of pumping beginning in 2029. The City would be able to meet the MDD in 2029 by pumping 20.5 hours per day and transferring water between zones through PRVs, however by 2044 the current sources will be inadequate." *The current plan seems to count on "stressing the system" until it must be addressed*.

5. **Effect on Indigenous Wildlife (re. PMC 18.80.149 (K) states: There will not be significant unmitigated harmful effects upon environmental quality and natural resources.**
    a. A day rarely passes when we don't see bald eagles circling over the proposed Pinnacle site. Bald Eagles are protected under federal law, primarily through the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act, which prohibit harming, disturbing, or possessing eagles, their nests, or parts without a permit.
        i. "Disturb" is defined by 50 CFRS 22.3 as to "agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available:

1. Injury to an eagle
2. Decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or
3. Nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.

ii. "Disturb" includes immediate impacts such as loud noises around the nest that may cause eagles to abandon their eggs or young chicks. A disturbance may also happen if humans change the landscape around the eagle nest. Even if these changes happen outside of the eagle nesting season, the eagle may have future decreased nest success or may abandon the nest if these changes are significant.

iii. Penalties are in place for any found guilty of an offense. Penalties double for an organization. Rewards are provided for information leading to arrest and conviction.

b. Bald eagles are also protected under Washington's Bald Eagle Protection Act (RCW 77.12.655). Key state protections include habitat protection, buffer zones, bald eagle management plans, and cooperative management.
c. In summary, Bald Eagles are protected in Washington by both state and federal laws. Federal law provides broader protections against harassment and harm.
d. Have either the city or the applicant checked for existing eagle habitat?

Finally, the city's recent review comments suggest that substantial questions remain regarding concerns that I have not raised in this letter. I respectfully request that those questions, and the concerns that I have raised, be fully answered and resolved before any recommendation of approval is made.

I am not asking the city to deny development. Rather, I am asking the city to ensure that the Pinnacle PRD Applicant demonstrates compliance with applicable requirements and that all important questions and issues are addressed before the project proceeds in the review process.

Thank you for your consideration.

Respectfully submitted,

John M Warwood
17796 Sunrise Ridge Ave NE
Poulsbo, WA 98370

June 28, 2026

Ms. Heather Wright

Planning Director and SEPA Responsible Official

Planning & Economic Development Department

City of Poulsbo

200 NE Moe Street

Poulsbo, WA 98370

Re: Pinnacle at Liberty Bay PRD – SEPA Comments Regarding Construction-Related Environmental Disclosure (SEPA Checklist Items 1(e), 2(a), and 7(b)(2))

Dear Director Wright,

We respectfully submit these comments concerning the adequacy of the environmental disclosure provided in the Applicant's responses to SEPA Checklist Items 1(e) (Earth), 2(a) (Air), and 7(b)(2) (Noise).

Collectively, these checklist items are intended to disclose and evaluate the temporary environmental effects associated with construction of the proposed project. Those effects extend beyond the completed development itself and include earthwork, construction traffic, construction-generated noise and vibration, fugitive dust, diesel emissions, air quality impacts, construction sequencing, duration of disturbance, and other temporary environmental consequences associated with site development.

Our comments are not directed to the engineering feasibility of the proposed project, nor do they seek to substitute our judgment for that of the Applicant's engineers. Rather, they address whether the present SEPA record provides sufficient project-specific disclosure to permit meaningful evaluation of the construction-related environmental effects associated with one of the largest earthwork programs presently proposed within the City of Poulsbo.

The importance of project-specific environmental disclosure is underscored by the City's own Request for Revisions No. 3. In directing that the Notice of Application be reissued, the City explained that the revised notice was required, "consistent with the requirements of Chapter 36.70B RCW to ensure the public is accurately informed and provided a meaningful opportunity to comment." We respectfully submit that the same principle applies to the environmental disclosure supporting the City's SEPA determination. Meaningful public participation depends not only upon notice that a project exists, but also upon sufficiently complete disclosure of the environmental consequences associated with constructing that project.

The Applicant's current civil plans identify approximately 61,000 cubic yards of stripping, 166,800 cubic yards of required cut, 275,300 cubic yards of required fill, and a net fill requirement of approximately 108,500 cubic yards. These quantities describe a substantial

earthwork program extending across approximately thirty acres of the project site and encompassing all three phases of development.

Notwithstanding the scale of the proposed construction activities, the Applicant's responses to Checklist Items 1(e), 2(a), and 7(b)(2) remain largely generic. The responses acknowledge that construction will involve earthwork, construction equipment, dust, equipment emissions, and construction noise, but they provide little project-specific discussion concerning the anticipated duration, sequencing, location, or intensity of those activities, or of the corresponding environmental effects associated with construction of this particular project. Without greater project-specific disclosure, it is difficult for both reviewers and members of the public to understand the anticipated extent of those construction-related environmental effects or to evaluate whether the environmental disclosure accurately reflects the project proposed for approval.

Similarly, the Traffic Impact Analysis states only that construction activity is expected to generate a maximum of 60 to 80 trucks per day during a three- to four-week "mass grading and import phase." Beyond that conclusion, however, neither the TIA nor the SEPA Checklist explains the assumptions upon which those conclusions are based. The present record does not disclose the assumed truck fleet size, truck capacity, repeated haul cycles, haul distances, loading and unloading operations, staging locations, construction sequencing, or the analytical basis upon which the projected construction activity and its associated environmental effects were evaluated.

The environmental disclosure has also been overtaken by subsequent developments in the project record. Across three successive SEPA Checklists, the Applicant's estimate of imported structural fill changed substantially before arriving at the current estimate of approximately 108,500 cubic yards. The Applicant has also stated that a "large percentage" of the required fill will be obtained from on-site sources. Subsequently, City Engineering questioned whether portions of the on-site soils are suitable for structural fill because of fines content, and the Applicant responded that supplemental evaluation of soil suitability will occur during subsequent design. The present environmental record does not explain whether the environmental disclosure contained in Checklist Items 1(e), 2(a), and 7(b)(2) was reconsidered in light of those later developments.

Construction traffic, however, represents only one aspect of the construction-related environmental effects associated with this project.

Construction necessarily includes site clearing, tree removal, slash disposal, stump removal, stripping, utility installation, construction of numerous retaining structures, rough grading, finish grading, and related earthmoving activities. Collectively, these operations have the potential to generate construction-related noise, vibration, diesel emissions, fugitive dust, and temporary air quality effects over an extended period.

These considerations are especially significant along the western and southern boundaries of the Crystal View subdivision, where substantial retaining structures are proposed immediately adjacent to existing occupied residences. Construction activities in these locations will necessarily occur in close proximity to homes whose occupants presently use their rear yards and

other outdoor living areas. The responses provided to Checklist Items 2(a) and 7(b)(2) acknowledge that construction activities will generate dust, equipment emissions, and construction noise. However, those responses remain largely generic. They do not explain how the anticipated duration, sequencing, proximity, or localized intensity of those construction-related environmental effects were evaluated for this particular project, nor do they explain how the temporary environmental effects upon adjoining residences were assessed. More detailed disclosure would assist both the Responsible Official and neighboring property owners in understanding the anticipated nature and duration of those construction-related environmental effects before subsequent land use decisions are made.

The record likewise does not explain whether differing retaining structure types and construction methodologies or site constraints associated with various retaining structures across the project site—including those immediately adjacent to existing residential property—were considered in evaluating the duration or environmental effects of construction activities.

The Applicant has also stated that mass grading for all three phases will occur within the first twelve months of construction. The present record does not disclose the construction sequencing or scheduling assumptions supporting that conclusion, nor how those assumptions relate to the construction-related environmental effects disclosed in the SEPA Checklist.

Our review of recent Traffic Impact Analyses submitted to the City for other development projects suggests that considerably greater transparency concerning construction-related environmental effects is both feasible and consistent with recent practice before the City. The Audrey Estates Traffic Impact Analysis discloses earthwork assumptions, truck capacities, estimated truckloads, construction phasing, and daily truck estimates. The Oslo Bay Apartments Traffic Impact Analysis devotes a separate section and supporting appendix to construction worker trips, truck trips, construction scheduling, construction access, and construction traffic operations. Those examples demonstrate that substantially more complete disclosure of construction-related environmental effects is practicable. By comparison, the Pinnacle project provides only a brief narrative description of construction activities without comparable disclosure of the assumptions underlying the resulting environmental analysis.

These comments are not intended to advocate any particular construction methodology, construction schedule, or engineering solution. Rather, they respectfully request that the environmental record disclose the analytical basis upon which the construction-related environmental effects identified in Checklist Items 1(e), 2(a), and 7(b)(2) have been evaluated.

Accordingly, and consistent with the City's stated objective of ensuring that the public is accurately informed and afforded a meaningful opportunity to comment, we respectfully request that, before issuance of the City's final SEPA determination, the Responsible Official consider whether the present environmental record provides sufficient project-specific disclosure to permit both informed environmental review and meaningful public understanding of the temporary environmental effects associated with construction of the proposed project, including the following:

1. The assumptions and analytical basis supporting the conclusion that the proposed earthwork program can be accomplished during a three- to four-week mass grading and import phase while generating a maximum of only 60 to 80 trucks per day.

2. The assumptions concerning truck fleet size, truck capacity, haul-cycle duration, construction sequencing, project duration, import and export quantities, disposition of stripping materials, staging locations, and other operational assumptions necessary to evaluate the construction-related environmental effects disclosed in the SEPA Checklist.

3. Whether the environmental disclosure supporting Checklist Items 1(e), 2(a), and 7(b)(2) has been reconsidered in light of the City's subsequent geotechnical comments regarding the suitability of on-site soils for structural fill and the Applicant's stated intention to perform additional soil evaluation during later design.

4. Whether the present environmental disclosure adequately evaluates the localized construction-related environmental effects associated with prolonged construction activities immediately adjacent to existing residences, including construction noise, vibration, diesel emissions, fugitive dust, temporary air quality effects, and the duration of those activities.

5. Whether the present SEPA record provides a sufficiently complete, project-specific description of construction activities and their temporary environmental effects to permit informed environmental review and meaningful public participation before issuance of the City's final SEPA determination.

The issue presented is not whether the proposed project can ultimately be constructed. Rather, it is whether the present environmental record provides the level of project-specific disclosure contemplated by Checklist Items 1(e), 2(a), and 7(b)(2) to permit informed consideration of the temporary environmental consequences of constructing the proposed project.

We respectfully request that these matters be considered before completion of the City's SEPA review so that the environmental disclosure accompanying the City's determination provides both the Responsible Official and the public with a sufficiently complete understanding of the temporary environmental effects associated with construction of the proposed project before subsequent land use decisions are made. We also request that this letter be provided to the members of the Planning Commission ahead of the scheduled public meeting on July 7, 2026

Thank you for your consideration of these comments.

Respectfully submitted,

Dana Lockhart

Katharine Lockhart

cc: Crystal View Homeowners Association

From:	Andrew Hitchings
To:	City of Poulsbo Planning and Economic Development; Nikole CH. Coleman
Subject:	Subject: Supplemental Public Comment: Significant Grade and Sight-Distance Hazards on Crystalia Ct – Pinnacle at Liberty Bay
Date:	Sunday, June 28, 2026 8:50:11 AM

Dear Members of the Planning Commission and Planning Director Wright,

I am writing to submit critical, specific engineering and safety concerns regarding the proposed Road C connection to NE Crystalia Ct as detailed in the current "Pinnacle Plan.pdf" civil drawings.

A review of the site topography indicates that the proposed road connection will create an abrupt grade transition, shifting sharply from a positive slope to a negative slope as it meets the existing cul-de-sac. This dramatic change in vertical alignment will create severe blind spots for both heavy construction equipment and everyday residential vehicles entering or exiting the circle.

Furthermore, this extreme grade change means the proposed intersection will fail to meet standard municipal line-of-sight minimums required for a safe road entrance. Introducing this design as an "All Phase Stabilized Construction Entrance" dramatically intensifies an already hazardous environment for our neighborhood's families.

To eliminate this manufactured danger entirely, the Planning Commission should require the developer to realign the access road so that it runs well below the existing homes, or utilize the thousands of yards of unpopulated borders available to the site. The current design is inherently flawed, and the city must compel the developer to prioritize public safety over cost-cutting layout shortcuts.

Sincerely,

Andrew Hitchings

Poulsbo Resident

Crystal View

To:

Ms. Nikole Coleman

Planning Manager

Planning and Economic Development Department

City of Poulsbo

l

200 NE Moe Street

Poulsbo, WA 98370

Subject: Property Protections and Neighborhood Impact Concerns Regarding Pinnacle at Liberty Bay (P-06-01-26-01)

Dear Ms. Coleman,

As homeowners at Crystal View residing directly on the border adjacent to the proposed Pinnacle development, we are writing to submit our formal concerns regarding the protection of our property and our immediate neighborhood. As invested citizens who contribute substantially to Poulsbo's tax base and local economy, we do not intend to impede progress or halt growth. We understand that development is an inevitable part of a growing region. However, we expect that growth to be managed with the highest level of care, foresight, and strategic planning. Lately, however, there appears to be a rushed push toward high-density developments under the guise of creating affordable housing. In reality, the price points of these new builds far outpace the incomes and capacities of local working families, serving commercial interests rather than community needs. It feels less like thoughtful planning and more like a land grab that prioritizes developer profit over the safety, stability, and value of existing homes.

Because our property sits directly on the adjacent perimeter of this proposed site, we are requesting formal, written clarification on the following critical points before any permits are finalized:

1. Structural Assurances and Slope Damage Protections

The massive grading and earth-moving required for this development on our shared hillside pose a direct concern for the stability of our properties.

- What specific steps and preventative measures will be taken to ensure that border houses like ours do not experience foundation shifting, settling, or structural damage during the land removal, clearing, and building phases?
- If structural or foundational damage does occur as a direct result of adjacent construction and vibration, what is the established process for the developer to take immediate financial and legal responsibility for repairs?
- What independent engineering reviews have been conducted to guarantee that altered slope mechanics and stormwater runoff will not cause long-term erosion or drainage issues on our property?

2. Resolution of the Crystalia Court Bottleneck and Piggyback Logistics

The applicant's current position that a street connection to the existing Baywatch Ct. NE stub is "impossible" places an unfair burden entirely on our immediate neighborhood. By failing to distribute permanent traffic, 100% of the future development's vehicles will be funneled directly onto NE Crystalia Court.

The proposed entranceway at NE Crystalia Court is a quiet residential cul-de-sac. It was fundamentally designed and built for low-volume neighborhood use, not to carry heavy, continuous, two-way through traffic over the long term. Forcing an entire new subdivision's permanent daily traffic through a single cul-de-sac pipe represents a severe failure of basic logistics and infrastructure planning.

Furthermore, this long-term traffic strain is exacerbated by the immediate physical threat shown in the applicant's April revised preliminary TESC plan, which designates NE Crystalia Ct. as the "All Phase Stabilized Construction Entrance" for the entire project. Routing heavy earth-moving machinery, concrete trucks, and construction crews onto this residential cul-de-sac poses a significant safety and infrastructure risk.

This represents an unacceptable pattern of "piggyback planning," where a new development relies blindly on the established infrastructure of neighboring communities without any independent logistical foresight. Forcing Crystalia Court to serve as both the multi-year industrial funnel and the sole permanent neighborhood access point is clearly a cost-saving shortcut designed to avoid the expensive civil engineering required to build an independent road through the steep slopes and wetlands lower on the property. Our residential street should not absorb the physical degradation, safety hazards, and long-term traffic congestion of their operations just because the developer wishes to cut corners. We ask that the city reject this configuration and review alternative access points—such as utilizing State Hwy 305—to handle heavy staging and distribute traffic safely.

3. Protection of Property Values, Border Consistency, and Shared Border Maintenance

An abrupt transition to a dense development threatens the hard-earned property values of the existing neighborhood. Per the Planning Director's Administrative Interpretation No. 2 issued on June 22, the city clarified that perimeter screening (PMC 18.260.070(B)) does not exempt a developer from matching the neighborhood environment under Subsection A.

- Because our community consists of established lots of 7,500 square feet or larger, we look to the review authority to ensure the developer maintains strict consistency by matching lot sizes, widths, and house scale along our immediate border.
- Because our property sits directly on the project's edge, we require clear answers regarding who will hold the long-term legal and financial responsibility for maintaining the shared border property line.
- If a perimeter buffer, retaining wall, or screening structure is installed, we need explicit assurances that the long-term maintenance, clearing of invasive species, or repair of border features will be the absolute responsibility of the developer or the future HOA—not forced upon the existing Crystal View homeowners whose properties are directly impacted.

4. Environmental Impact and Wildlife Protection

The clearing of this adjacent land will cause significant disruption to the local ecosystem and the wildlife refuge elements that currently thrive along our shared border. We are requesting information on what specific mitigation steps are being taken to protect local wildlife corridors and minimize the destruction of their natural habitat during development.

Furthermore, due to the immediate proximity of the site to our backyard, the prolonged exposure to construction dust and noise is a major quality-of-life concern. We ask that the city enforce strict, daily monitoring of environmental controls so that neighboring homeowners are not left dealing with excessive property impacts or health sensitivities.

As residents who have invested heavily in this community, we trust that the Planning and Economic Development department, the Planning Commission, and the Hearing Examiner will look out for the protections of existing homeowners. We look forward to your formal, point-by-point response regarding these assurances.

Thank you for your consideration.

Respectfully submitted,

Josh and San Powers

Crystal View Homeowners

Poulsbo, WA 98370

From: Rowell Matt
To: City of Poulsbo Planning and Economic Development
Subject: All-Phase Construction Entrance
Date: Monday, June 29, 2026 7:30:57 AM

[You don't often get email from rowellmatt@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

> City of Poulsbo
>
> Adding an all-phase construction entrance for the Pinnacle project to Crystallia Ct. completely disregards public safety. It’s grossly negligent to have heavy construction equipment pass through a residential neighborhood when there are multiple other options. Has anyone from the City even seen how narrow the entrance to this court is with the curb extensions that are in place There is room for only one car at a time to enter or exit the court. Imagine heavy equipment and cars trying to negotiate this safely. Not going to work safely.
>
> Rowell Matt
> Sent from my iPhone

From:	Andrew Hitchings
To:	City of Poulsbo Planning and Economic Development; Nikole CH. Coleman
Subject:	Technical Submittal and Public Comment: Code Non-Compliance Objection, Pattern of Regional Disregard, and Feasible Frontage Access Alternatives – Pinnacle at Liberty Bay
Date:	Monday, June 29, 2026 10:58:20 AM

Subject: Technical Submittal and Public Comment: Code Non-Compliance Objection, Pattern of Regional Disregard, and Feasible Frontage Access Alternatives – Pinnacle at Liberty Bay

Date: June 29, 2026

Dear Members of the Planning Commission and Poulsbo Planning & Economic Development Department,

I am writing to formally submit my urgent concerns, engineering objections, and strong opposition regarding the current civil and traffic plans for the proposed Pinnacle at Liberty Bay development, specifically concerning the designated use of NE Crystalia Court.

======== THE PLANNING COMMISSION MUST NOT RUBBER STAMP THIS DEVELOPMENT

All environmental, safety, and engineering concerns need to be fully and independently addressed before this project is allowed to proceed. A review of the project entities' regional history reveals a consistent pattern of bypassing robust infrastructure standards and taking short-cuts on environmental protections until the public demands accountability.

A rigorous technical review of the proposed intersection of "Road C" and NE Crystalia Court as detailed in the current civil drawings ("Pinnacle Plan.pdf") reveals critical geometric, grading, and safety deficiencies that directly violate municipal street design criteria and state public safety mandates. The current design presents an un-engineered, hazardous grade transition that compromises basic public safety. The city must compel the developer to address the following documented non-compliance, pattern of code-skirting, and liability findings:

TECHNICAL SUBMITTAL FINDINGS

1. **SEVERE SAFETY RISKS TO LOCAL RESIDENTS AND CHILDREN** Designating NE Crystalia Court as an "All Phase Stabilized Construction Entrance" is entirely unsafe and unacceptable. This street and the immediate surrounding neighborhood are home to multiple families with small children. Introducing heavy construction vehicles, large machinery, and high-volume industrial traffic directly into a residential cul-de-sac environment poses an immediate, severe physical threat to our residents.

2. **GEOMETRIC NON-COMPLIANCE: DEFICIENT CREST VERTICAL CURVE ALIGNMENT** As delineated in "Pinnacle Plan.pdf", the proposed civil alignment

forces an abrupt grade break at the junction of Road C and the existing NE Crystalia Court cul-de-sac. Topographical data dictates that this connection introduces a severe grade transition, shifting rapidly from a positive slope of approximately +7% to +9% (4 to 5 degree upgrade) to a negative slope exceeding -9% to -12% (greater than 5 degree downgrade).

Under established Washington municipal design protocols and regional street standards, any algebraic grade difference exceeding 1.0% requires a fully engineered vertical curve to smoothly transition slopes [See Reference 1]. The proposed design features a massive, non-compliant algebraic grade difference of roughly 16% to 21%. Attempting to terminate an abrupt grade break of this magnitude directly into a pre-existing residential cul-de-sac without a compliant, calculated vertical curve length is a fundamental breach of standard civil engineering practice [See Reference 2].

3. **FAILURE TO MEET MANDATORY STOPPING SIGHT DISTANCE (SSD) MINIMUMS** Because the developer has failed to provide a compliant vertical curve, the intersection creates an artificial "hump" or geometric blind spot. Under American Association of State Highway and Transportation Officials (AASHTO) standards—which govern municipal access design—a crest vertical curve must provide adequate Stopping Sight Distance (SSD) [See Reference 3].

Standard SSD calculations require that a driver, with an established eye-height of 3.5 feet, must have an unobstructed line of sight to see an object just 0.5 feet high (the height of a small child) on the road surface ahead. Due to the confined horizontal footprint of the existing Crystalia Court cul-de-sac, there is physically insufficient right-of-way distance available to construct a legally flat, compliant vertical curve that can resolve a 16%+ grade break. Consequently, the proposed intersection will permanently fail to meet minimum legal line-of-sight safety thresholds, actively manufacturing a blind spot where vehicles enter and leave the existing residential circle.

4. **ADMISSION OF ENVIRONMENTAL VULNERABILITY & CONTRADICTORY GEOTECHNICAL DISCLAIMERS** The applicant’s attempt to bypass standard engineering rigor is further exposed by questionable disclaimers and alarming admissions within their own submitted project reports.

- In the project’s official Stormwater Report, the applicant explicitly acknowledges that the development’s runoff flows directly into an endangered, legally protected environment, noting a "Violation of surface water quality standards - impaired downstream water bodies... Liberty Bay (Category 5 - 303d, Dissolved Oxygen)."

- Concurrently, the applicant’s Geotechnical Addendum includes a standard liability-shifting disclaimer admitting that "variations may exist between the soil and groundwater conditions reported and those actually underlying the site... and may not be evident before construction begins."

It is highly contradictory that the developer's engineers admit they cannot verify underlying underground soil and water variations, yet they are attempting to punch a steep, un-engineered, blind-spot grade connection through a neighborhood instead of taking a safer, flat route along the open frontage. Forcing a high-risk layout over a vulnerable slope directly threatens both neighborhood child safety and an already legally impaired watershed.

5. **DOCUMENTED REGIONAL PATTERN OF INFRASTRUCTURE EXPLOITATION** This attempt to push an aggressive, substandard layout is not an isolated planning error; it reflects a documented behavioral pattern by the involved development entities across western Washington. In prior municipal reviews in surrounding regional jurisdictions (including King and Pierce Counties), these entities have faced significant community and administrative pushback for attempting to minimize environmental and structural risks in their initial paperwork to maximize profit margins. This Commission must not allow Poulsbo to be the next jurisdiction where they export an unsafe, cost-cutting shortcut.

6. **FEASIBLE ENGINEERING ALTERNATIVE: STATE ROUTE 305 FRONTAGE ENTRANCE** The developer's insistence on forcing 100% of the project's traffic through a neighborhood cul-de-sac is scientifically unnecessary. As outlined on the project boundaries in "Pinnacle Plan.pdf", the subdivision features an extensive southern border directly fronting State Highway 305. A technically superior and vastly safer alternative is to construct a dedicated, temporary construction and primary access entrance directly off the 305 frontage.

Crucially, review of the site hydrology confirms that a frontage entrance can be strategically located on the southern perimeter to entirely avoid crossing Stream A or encroaching upon its associated critical fish-bearing wetland buffers. If the developer and the city maintain that environmental regulations rightfully prevent road access at Baywatch Court due to stream impacts, that same logic dictates utilizing the wide-open, unpopulated 305 frontage. It eliminates the severe grading violations and blind spots engineered into the Crystalia Court proposal, protects the local fish habitat, and isolates industrial traffic from neighborhood children.

7. **PUBLIC RECORD NOTICE AND INDIVIDUAL LIABILITY NOTICE** Let this document serve as formal notice to the Planning Commission, the PED Department, and the developer's engineering professionals of record.

Forcing heavy construction traffic through a densely populated residential zone when a viable, code-compliant alternative exists opens the City of Poulsbo, the Planning Department, and the developer to severe legal liability and high-stakes lawsuits. Standard municipal immunity shields are legally predicated on the assumption that officials and engineers act in good faith without prior knowledge of inherent design defects.

Because these specific grading deficiencies, sight-line violations, and child-safety hazards are now explicitly and publicly unmasked in the municipal record, **ANY INDIVIDUAL OFFICIAL, PLANNING COMMISSIONER, OR LICENSED PROFESSIONAL ENGINEER WHO SUBSEQUENTLY SIGNS OFF ON OR APPROVES THESE PLANS STRIPS AWAY THEIR STANDARD LIABILITY PROTECTIONS.** Proceeding with an approval despite documented notice of a severe, manufactured safety trap constitutes a reckless disregard for public safety, exposing individual decision-makers and design professionals to direct personal civil liability torts if a preventable injury occurs.

CONCLUSION AND REQUIRED ACTION

The lack of public comment on previous projects does not signal neighborhood acquiescence to unsafe planning. As a community, we are actively mobilizing for the upcoming public

meeting on July 7th. To mitigate this clear public safety hazard, the Planning Commission must require the developer to utilize the thousands of yards of unpopulated site borders—specifically the non-stream-crossing Highway 305 frontage—to establish a compliant, isolated construction and residential corridor. The current submittal is a substandard layout shortcut that must be denied.

Thank you for your time, consideration, and oversight on this critical safety matter.

Sincerely,

Andrew Hitchings
Crystal View

Poulsbo Resident / Technical Review Advocate

TECHNICAL REFERENCES

[1] City of Poulsbo Street Standards, Section 2 (Grades & Alignment Standards) and Kitsap County Road Standards, Section 3.1 (Vertical Alignment Requirements): Mandates that all algebraic grade changes in excess of 1.0% shall be connected by an engineered vertical curve to prevent sudden structural and visibility breaks.

[2] Washington State Department of Transportation (WSDOT) Design Manual, Chapter 1220 (Geometric Design Criteria): Outlines standard limits for maximum allowable road grades and strict compliance parameters for vertical alignment breaks within municipal right-of-ways.

[3] AASHTO "Green Book" (A Policy on Geometric Design of Highways and Streets), Section 3.4.2 (Crest Vertical Curves): Establishes the mathematical formulas mapping algebraic grade differences to required minimum stopping sight distances, ensuring clear lines of sight to a 0.5-foot target object from a 3.5-foot driver eye height.

From:	Andrew Hitchings
To:	City of Poulsbo Planning and Economic Development; Nikole CH. Coleman
Subject:	Some background on the Pinnacle developer - Past WA state issues
Date:	Monday, June 29, 2026 11:49:30 AM

Dear Members of the Planning Commission and Poulsbo Planning & Economic Development Department,

I wanted to point out the developers track record since they are using these tactics on the Pinnacle development. It will be much cheaper to address the concerns now rather than have to litigate solutions later.

Thanks,
Andrew Hitchings

When pushing high-density Planned Residential Developments (PRDs) into established communities, they frequently deploy the "not important" defense to downplay severe local impacts.

Here is the explicit list of statewide precedents, complaints, and administrative pushbacks filed against these entities in other towns, illustrating exactly how they minimize structural and environmental rules to maximize their buildable lot yields:

1. King County (Black Diamond & Maple Valley Area)

- **The Infraction:** Attempting to bypass strict roadway classification and horizontal curve radiuses on steep perimeter hillsides.
- **The "Not Important" Loophole:** The developer argued that the targeted access roads were "low-volume local connectors," meaning detailed slope-stability modeling and extensive sight-distance calculations were "not important" for the preliminary plat phase.
- **The Outcome:** Local citizens and city engineers forced independent geotechnical reviews after documenting that the developer's "minor grade adjustments" actually created severe blind spots and unmitigated runoff risks on vulnerable, clear-cut hillsides.

2. Pierce County (Gig Harbor & Bonney Lake Jurisdictions)

- **The Infraction:** Deliberately minimizing fish-bearing stream designations and shaving down wetland buffers to preserve high-density lot layouts along property perimeters.
- **The "Not Important" Loophole:** Much like the current dispute with the Suquamish Tribe over the Poulsbo site, the developer used single-visit, dry-season environmental assessments to declare seasonal streams "non-fish-bearing." They filed paperwork claiming that minor, temporary buffer intrusions were "not

important" to overall watershed health.

- **The Outcome:** Faced with formal technical objections from tribal resource managers and local conservation districts who provided multi-year spawning data, the developers were forced by hearing examiners to significantly widen their setbacks, resulting in mandatory lot count reductions.

3. Snohomish County (Lynnwood & South County Perimeter)

- **The Infraction:** Violating lot-transition mandates (**PRD perimeter matching rules**) by placing tightly packed, sub-4,000-square-foot lots and three-story structures directly against traditional, large-lot single-family neighborhoods.

- **The "Not Important" Loophole:** When neighborhood groups filed formal complaints regarding the sudden loss of privacy, blocked views, and collapsing property values, the developer's legal team argued that matching the existing neighborhood's character was "not important" when compared to fulfilling regional "attainable housing density" quotas. They claimed that the overarching PRD framework effectively handed them a blanket waiver to ignore local perimeter compatibility rules.

- **The Outcome:** Set a precedent where municipalities began enforcing strict, mandatory 25-foot continuous vegetated open space buffers and sight-obscuring fencing to prevent developers from "sandwiching" existing homeowners between high-density traffic corridors.

How They Fabricate the "Not Important" Safe Harbor

Across all of these towns, the playbook remains identical:

1. **Isolate the Variable:** They treat every critical code violation (like a 16%+ grade break or a missing 25-foot vegetated buffer) as an isolated, minor technical detail rather than a compounding safety hazard.

2. **Hide Behind Boilerplate Disclaimers:** They insert liability-shifting language into their geotechnical and stormwater reports—admitting that soil and water conditions are highly unpredictable—yet they simultaneously tell city planning commissions that these hidden risks are "not important" enough to delay layout approvals.

3. **Exploit Administrative Lag:** They rely heavily on database backlogs (such as state mapping systems) to ignore updated, localized tribal data, asserting that if a safety or environmental hazard isn't officially indexed on a state website yet, it is legally "not important."

From:	Mikus Music
To:	Nikole CH. Coleman
Subject:	Pinnacle at Liberty Bay PRD and Preliminary Subdivision - Public Comment
Date:	Monday, June 29, 2026 12:40:10 PM

Hello,
My name is Michael Dicus, I am a resident of Poulsbo. I would agree that there would be adverse environmental impacts to this lot, we need to stop with the de-forestation in our town for over development of construction projects and run off/erosion into Liberty Bay.
There needs to be more strict regulations around development and environmental protections, not just for the health of the forest, watershed, and animals, but the impacts on the health of our community members as well.

Thank you.
-Michael Dicus

June 29, 2026

Ms. Heather Wright

Planning Director and SEPA Responsible Official

Planning & Economic Development Department

City of Poulsbo

200 Moe Street

Poulsbo, WA 98370

Re: Pinnacle at Liberty Bay PRD – Adequacy of Housing Classification (SEPA Checklist Item 9(a))

Dear Director Wright,

We respectfully submit the following comments concerning the adequacy of the Applicant's response to Item 9(a) of the current SEPA Environmental Checklist.

Item 9(a) requests the Applicant to indicate whether the proposed housing is intended to serve the high-, middle-, or low-income market. In response, the Applicant classifies the proposed development as providing "138 middle income market rate" residential units.

The issue presented by these comments is not whether that classification will ultimately prove to be correct. Rather, it is whether the present SEPA record contains information sufficient to support the housing classification provided in Item 9(a), thereby permitting the Responsible Official and members of the public to understand and evaluate the Applicant's response.

The present project record provides no explanation of what the Applicant means by the term "middle income," no indication of the income range intended by that classification, and no disclosed factual or analytical basis demonstrating why the future homes are expected to serve that market segment.

This absence of supporting information is particularly noteworthy because the Applicant has repeatedly stated elsewhere in the project record that the homes have not yet been designed, future builders have not yet been identified, and many engineering and construction decisions will occur only after approval of the subdivision. Under those circumstances, the present record provides no disclosed basis upon which the Responsible Official or members of the public may independently evaluate the housing classification contained in Item 9(a).

The significance of this issue is underscored by the Applicant's repeated certification of its SEPA submissions. The current Checklist is the third SEPA Checklist submitted for this project. Although the number of proposed residential lots has changed during the review process, the Applicant has consistently classified the proposed housing as "middle income." Each Checklist

was signed by an authorized representative of the Applicant, certifying that the responses were "true and complete to the best of my knowledge" and acknowledging that "the lead agency is relying on them to make its decision." We respectfully submit that, where the City is asked to rely upon a housing classification in making its SEPA determination, the project record should disclose the factual and analytical basis supporting that classification.

The City has devoted substantial effort through its Comprehensive Plan, Housing Needs Assessment, and related affordable housing initiatives to evaluating community housing needs using defined income categories supported by objective analysis. Against that background, the absence of any comparable explanation supporting the Applicant's housing classification is particularly noticeable.

Accordingly, before issuance of the City's final SEPA determination, we respectfully request that the Responsible Official consider whether the present project record contains an adequate factual basis upon which to rely on the housing classification provided in Item 9(a). If not, we respectfully request that the Applicant be required either to:

1. publicly disclose, through the project record, the factual and analytical basis supporting the housing classification contained in Item 9(a), in sufficient detail to permit meaningful public review and evaluation before completion of the SEPA process; or

2. revise Item 9(a) so that the housing classification accurately reflects the information presently disclosed in the project record.

These comments are not intended to advocate for or against any particular category of housing, nor to speculate regarding the future selling prices of homes that have yet to be designed or constructed. Rather, they are intended to ensure that a housing classification upon which the City is asked to rely during the SEPA process is supported by information disclosed in the administrative record and available for meaningful public review.

We respectfully request that these comments be considered before completion of the City's SEPA review. We also respectfully request that this letter be provided to the members of the Planning Commission in advance of their consideration of the Pinnacle application.

Thank you for your continued consideration of these comments.

Respectfully submitted,

Dana Lockhart

Katharine Lockhart

cc: Crystal View Homeowners Association

From: kathy
To: City of Poulsbo Planning and Economic Development; Nikole CH. Coleman
Subject: Pinnacle at Liberty Bay
Date: Monday, June 29, 2026 7:15:46 PM

Please don't ignore our valid concerns by rubber stamping the developers' plans. Please be more concern about your CONSTITUENTS than outside organizations who don't have to live with their destruction of land, small lots, and houses crammed up against each other, homes that do not mirror adjoining neighbors. There isn't any parking on the streets they are wanting to build. That means, people will be trying to park in the few parking spots we have on sunrise ridge.

Please protect the people that already live here. The value of homes are already being affected by this proposed development. Please DO NOT allow construction vehicles to travel down and through Merridith Heights and Crystal view on Sunrise Ridge.

Thank you,

Kathleen Hamlin

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Documented Civil Design Violations & Safety Threats
The civil drawings in "Pinnacle Plan.pdf" reveal severe design shortcuts that put local families at immediate risk:
Crystalia Court "Blind Hump" Hazard: The developer intends to use NE Crystalia Court as an "All Phase Stabilized Construction Entrance". The proposed road hits an abrupt grade break, shifting sharply from a 4° to 5° upgrade (+7% to +9%) to a steep downgrade exceeding -5° (-9% to -12%).
Direct Violation of Road Standards: Kitsap County Road Standards Section 3.1 mandates a fully engineered vertical curve for any grade change over 1%. This layout creates an illegal, abrupt 16% to 21% grade break with zero physical room inside the confined cul-de-sac to build a legal safety curve.
Illegal Stopping Sight Distance (SSD): This artificial crest completely violates AASHTO municipal line-of-sight safety minimums. It creates a permanent, severe blind spot for heavy industrial machinery and residential vehicles exactly where our children live and play.
Severe Safety Risks to Local Residents: Forcing high-volume heavy industrial vehicle traffic directly into a small residential cul-de-sac environment poses an immediate, severe physical threat to multiple families with small children who live and play there daily.
Corporate Record of Environmental Vulnerability & Rule-Skirting
Admitted Watershed Vulnerabilities: In their official Stormwater Report, engineering firm ESM Consulting admits the project's runoff flows into an already highly endangered ecosystem: “Liberty Bay (Category 5 - 303d, Dissolved Oxygen)”—the state’s most severe water-impairment ranking.
Shifting Ground Disclaimers: In their June 17, 2026 Geotechnical Addendum, the developer explicitly states: “Variations may exist between the soil and groundwater conditions reported and those actually underlying the site... and may not be evident before construction begins.” They admit they don't fully understand the ground stability, yet want to punch a steep, hazardous road through our neighborhood.
Regional Pattern of Infrastructure Exploitation: Across King and Pierce Counties, these same development entities have historically faced major community and administrative pushback for attempting to minimize structural, environmental, and drainage risks in their initial paperwork to maximize profit margins.
A Safer, Compliant Alternative Exists
Highway 305 Frontage: This project features an extensive southern border directly fronting State Highway 305.
Zero Stream Impact: Review of the site hydrology confirms a temporary construction entrance can easily be built off the Highway 305 frontage without crossing Stream A or encroaching upon its protected fish-bearing wetland buffers. This completely isolates industrial traffic from neighborhood cul-de-sacs, maintains safe road slopes, protects the ecosystem, and completely respects local fish habitat regulations.
Hold Them Personally Liable
By placing these specific grading and safety hazards into the public record today, the City, the Planning Department, and individual engineers are now on official notice. Any individual who signs off on these flawed plans strips away
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their standard immunity shields and can be held personally liable for a reckless disregard of public safety.

TAKE ACTION: Copy this information and email your formal objections to plan&econ@cityofpoulsbo.com and ncoleman@cityofpoulsbo.com before the July 1st deadline. Demand they force the developer to route construction traffic through the unpopulated Highway 305 frontage.

SHOW UP: Speak up at the public meeting on Tuesday, July 7th at 6:00 PM. We only get 3 minutes each—bring these technical points and make them count!

Public Record Sources & Technical References:

City of Poulsbo Pinnacle Project Portal

Kitsap County Road Standards, Section 3.1 & City of Poulsbo Street Standards, Section 2: Mandates engineered vertical curves for algebraic grade changes in excess of 1.0%.

AASHTO "Green Book", Section 3.4.2: Establishes mandatory line-of-sight safety minimums for stopping sight distance (SSD) over crests.

June 29, 2026

Ms. Nikole Coleman
Planning Manager, Planning and Economic Development Department
200 NE Moe Street
Poulsbo, WA 98370

Re: Pinnacle and Liberty Bay PRD Second Public Comment Period

Dear Ms. Coleman and Review Committee,

Thank you for the opportunity to comment on the revised Notice of Application. I am within 300 feet of the construction zone and am focusing my comments on NE Crystallia Court.

The most recent Pinnacle at Liberty Bay application documents indicate a stabilized construction entrance (SCE), by design standards at least 15 feet wide and 100 feet long, to be placed at the apex of Crystallia Court. Characteristics of this location create multiple utilities protection issues and human safety concerns. These characteristics include:

- Steep grades on both sides of the SCE create limited visibility of children and pedestrians on Crystallia Court as trucks climb out of the construction zone and into Crystallia Ct.
- Critical public utilities are located directly within (sewer manhole & water valve) or in close proximity (telecom riser, electrical power box, fire hydrant) to the SCE.
- SCE location is directly up a steep, paved road from a storm drain. Daily street sweeps will be insufficient to prevent sediment from flowing into this drain given the road grade, lack of attenuation and downhill flow on smooth surface, and truck frequency.

Context:
There are seven children ages 3 – 12 that live directly on Crystallia Court, with additional children joining them to ride bikes and scooters on the Crystallia Ct incline directly in front of the proposed SCE entrance. Given the steep elevation change beyond the apex of Crystallia Court, trucks will have extremely limited visibility as they climb out of the construction zone and enter Crystallia Ct which immediately starts to decline in an opposite grade. This will severely limit truck driver visibility at the entrance and place children/pedestrians at risk of death, truck drivers at risk of remorse, and City planners at risk of liability given this readily recognizable risk.

The sanitary sewer manhole located within the SCE it is not designed—or intended—to have a stabilized construction entrance (SCE) placed over it, because that configuration introduces concentrated loading and settlement which increases risk of utilities failures, and obstructs required access for maintenance and emergency response. Similar risks are present for additional critical infrastructure located in close proximity to the proposed SCE.

Given the massive landfill requirements of this project, the rock surface of SCE will inevitably fill in with dirt, reducing the ability of the SCE to prevent deposits of sediment onto Crystallia Ct.

Daily street sweeps will be insufficient to prevent entrance of sediment into the storm drain directly below the SCE given the road grade, lack of attenuation of flow, and truck frequency.

Specific Comment & Clarification Request: **Child & Pedestrian Safety**
The City of Poulsbo requires compliance with its adopted Construction Standards, including stormwater requirements that incorporate the Washington State Department of Ecology's Stormwater Management Manual for Western Washington (SWMMWW). Under BMP C105 (Stabilized Construction Access), entrances must be designed and maintained to prevent hazardous conditions.

1. Has the City reviewed and affirmatively determined that grade of the SCE, combined with the grade of NE Crystallia Ct will not limit sight distance and create a blind approach?
    - If yes, identify the specific engineering, BMP, or line of sight analysis that establishes this conclusion, and provide the road grade profile for the SCE.
    - If no, identify what additional review, design modification, or additional measures such as regrading, relocation, or enhanced high-visibility controls are required.

Specific Comment & Clarification Request: **Utility Protection & Construct. Stormwater Safety**
Pursuant to WAC 197-11-330 and applicable Construction Stormwater General Permit (NPDES) requirements for protection of existing infrastructure, please provide a clear yes/no determination supported by citations to the record:

2. Has the City evaluated whether the placement of a stabilized construction entrance in close proximity to existing utility appurtenances (sewer manhole, water valve, telecom riser, electrical power box, fire hydrant) creates a risk of physical damage, loss of operability, or access impediment during construction activities?
    - If yes, identify the specific engineering, SWPPP/TESC, or SEPA analysis that establishes this conclusion.
    - If no, identify what additional review, design modification, or condition of approval will be required before such a determination can be made.

Pursuant to WAC 197-11-330 and WAC 173-226-130, the environmental documentation and associated construction stormwater controls must demonstrate that probable significant adverse impacts are avoided or mitigated through specific, enforceable measures. The proposed stabilized construction entrance at NE Crystallia Court is located immediately upslope of a steeply descending roadway segment with an existing storm drain inlet situated downgradient. This configuration creates a continuous hydraulic and sediment transport pathway in which (1) track-out from construction vehicles will be deposited onto the adjacent traveled way at the rock-pad/pavement interface, (2) gravity-driven flows on the steep grade will rapidly convey deposited sediment and roadway runoff downslope, and (3) concentrated runoff will discharge directly to the storm sewer inlet with minimal attenuation on the paved surface. The current

application does not contain a site-specific analysis demonstrating that the proposed BMP suite (including inlet protection and stabilized entrance) is designed to function under these combined conditions of steep slope, minimal attenuation of paved path, and high-frequency construction traffic, nor does it identify intermediate controls (e.g., secondary sediment trapping, energy dissipation, or redundant inlet protection) sufficient to prevent discharge of sediment-laden water to the municipal stormwater system.

3. Has the City determined that the proposed entrance configuration will not result in a violation of water quality standards under WAC 173 201A or failure of BMP effectiveness as contemplated under the Ecology Stormwater Management Manual for Western Washington (SWMMWW), in relationship to the storm drain located in front of 1783 Crystallia Ct, located directly downhill from the SCE entrance?

    - If yes, identify the BMPs and design assumptions that support this determination, and clarify whether any physical devices will be placed in front of existing homes on NE Crystallia Ct to attenuate sediment flow to the storm drain.

    - If no, specify what additional BMPs or revisions are required to ensure that the stabilized entrance and downgradient inlet protection perform as intended given the documented topographic and infrastructure constraints.

<u>Recommended Alternative:</u>

There are alternative entrances to the proposed Pinnacle Bay development on Sunrise Ridge Ave NE that avoid these conspicuous human safety, utilities protection, and construction and stormwater safety issues. Those entrances are much more level, are not near public utilities nor uphill from existing storm drains and present significantly less risk to children/pedestrians. These locations are much closer to the Phase 1 build, and would allow for land fill to occur from the bottom up, rather than from the top (Crystallia Ct) down. The proposed location of the SCE is close to Phase 2 and 3 construction and given the steep grade (15-42%) beyond Crystallia Ct, the proposed plan seems analogous to starting construction of a skyscraper from the top down. Please see Appendix A for graphical representations of the concerns expressed in this letter.

Please place the City's responses to these comments and questions in the public record for consideration by the Planning Commission and Hearing Examination.

Sincerely,



Dana Womack, PhD, RN
1762 NE Crystallia Court
Poulsbo, WA 98370

Cc: Crystal View Homeowners Association

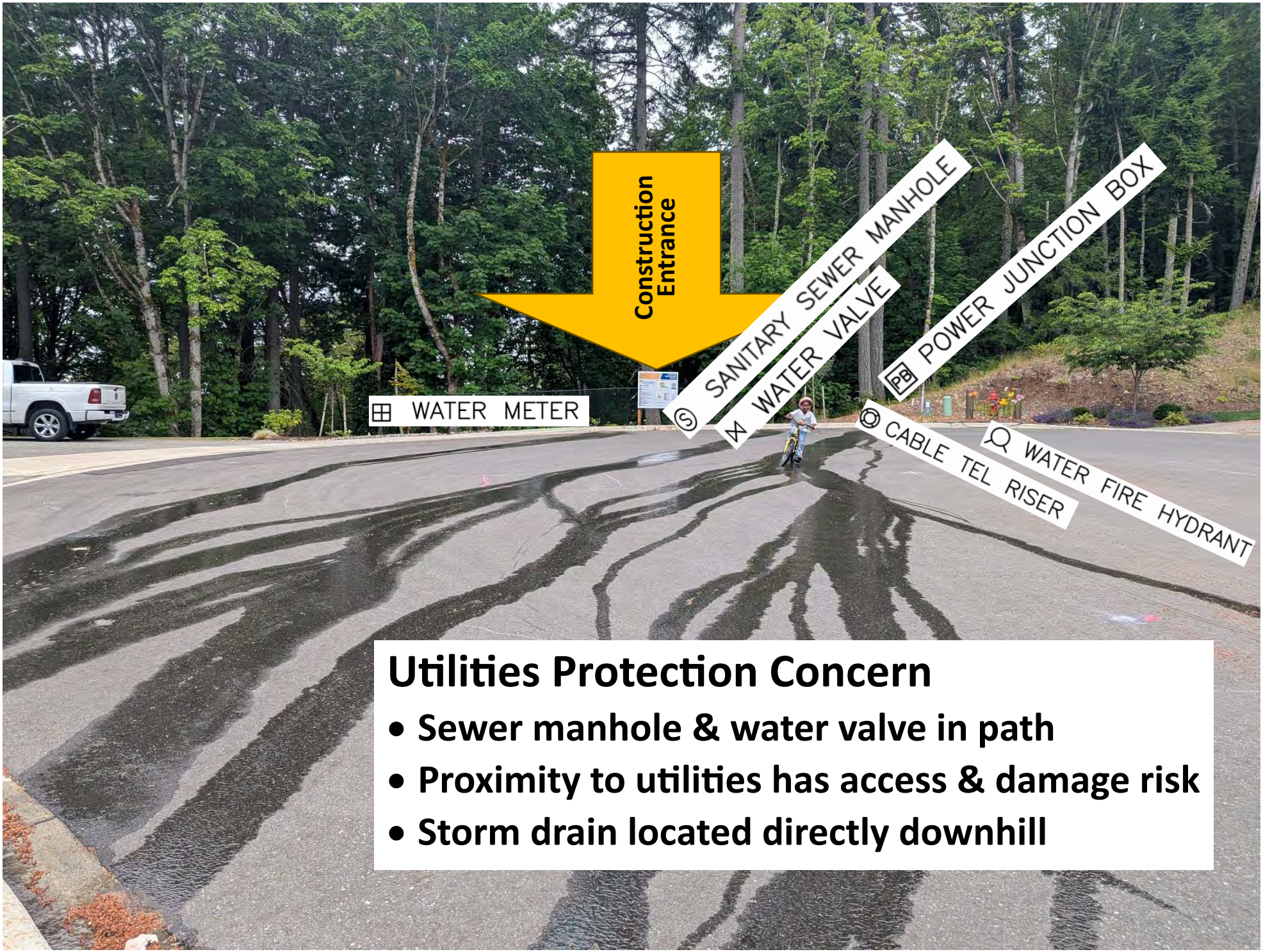
Appendix A: Photo Evidence Supporting Comments & Questions





Traffic Safety Concerns:

- **Narrow corridor for trucks when cars park**
- **Trucks create a hazard getting in/out of cars**
- **Parked cars limit visibility of kids playing nearby**

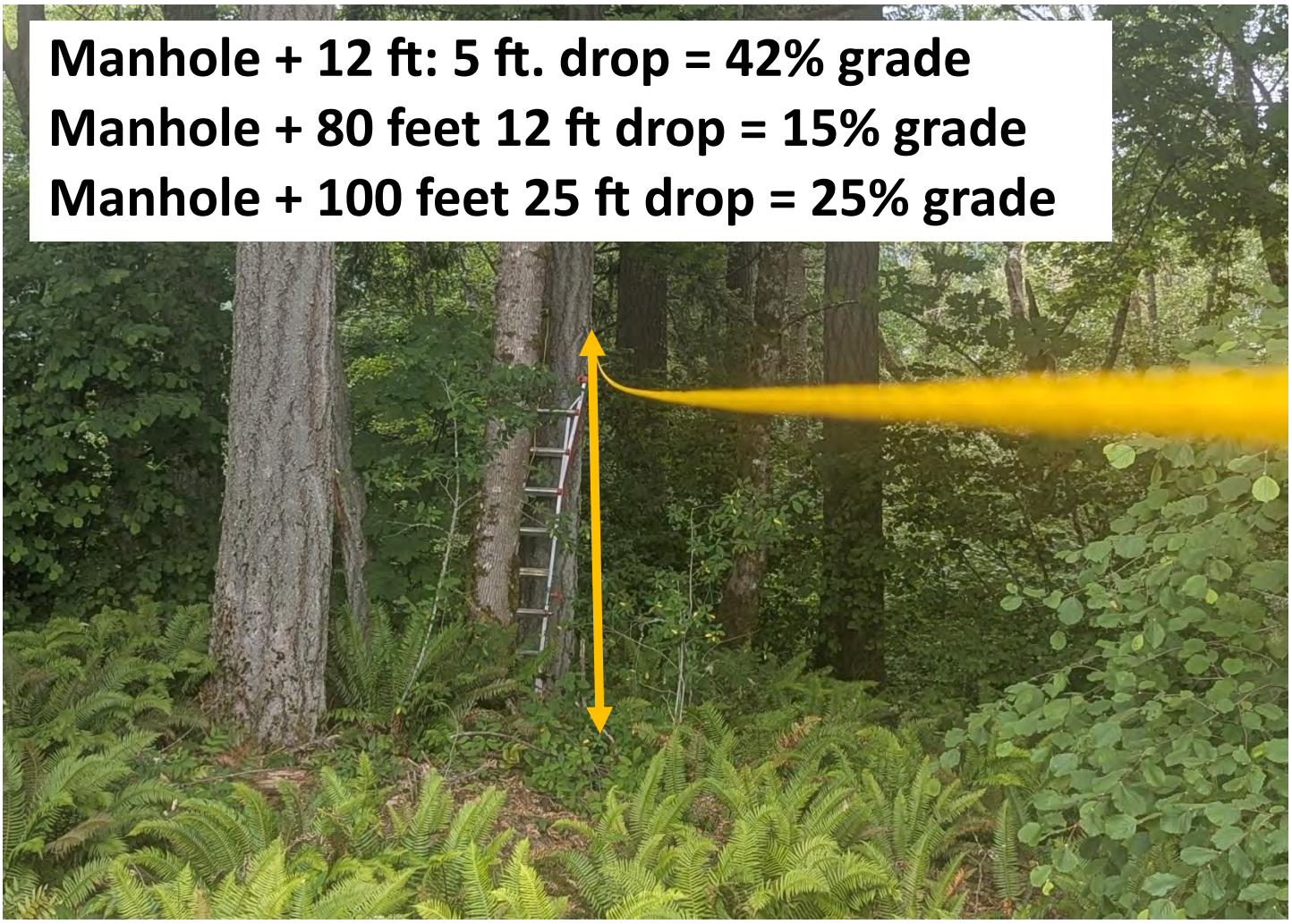


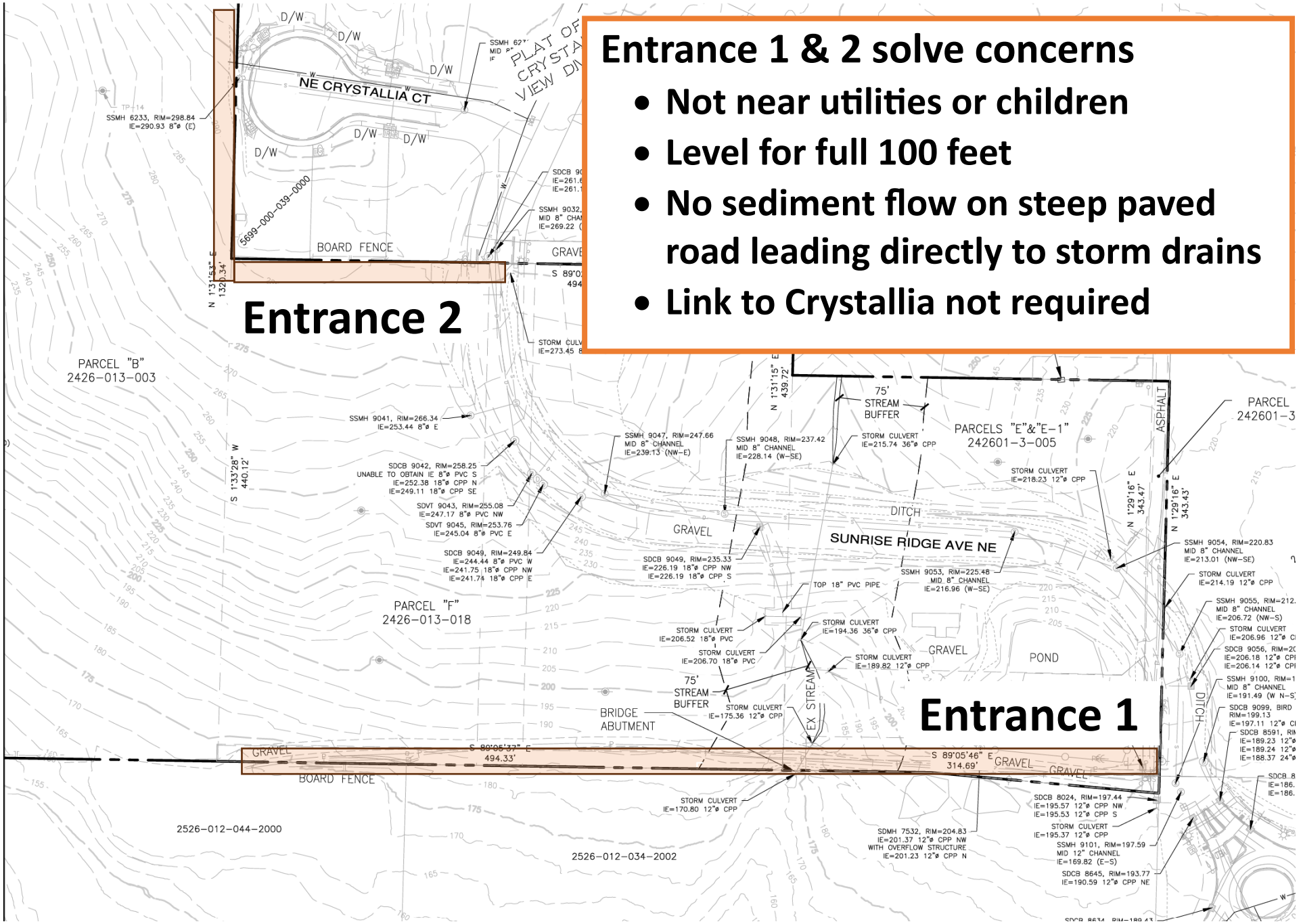
Utilities Protection Concern

- Sewer manhole & water valve in path
- Proximity to utilities has access & damage risk
- Storm drain located directly downhill


Utilities Protection Concern:
• Nothing to attenuate flow directly to Storm Drain (this drain is not addressed in application)
• May require tire wash station


Safety concern: Entrance will have steep grade, creating low visibility at crest.
Proximity to utilities: Entrance will be wider than minimum 15 ft because road is elevated
Sewer Manhole


Manhole + 12 ft: 5 ft. drop = 42% grade
Manhole + 80 feet 12 ft drop = 15% grade
Manhole + 100 feet 25 ft drop = 25% grade


Entrance 1 & 2 solve concerns
• Not near utilities or children
• Level for full 100 feet
• No sediment flow on steep paved road leading directly to storm drains
• Link to Crystallia not required
Entrance 2
Entrance 1
NE CRYSTALLIA CT
SUNRISE RIDGE AVE NE
PARCEL "B"
2426-013-003
PARCEL "F"
2426-013-018
PARCELS "E"&"E-1"
242601-3-005
PARCEL
242601-3
BOARD FENCE
GRAVEL
DITCH
POND
ASPHALT
75' STREAM BUFFER
EX STREAM
BRIDGE ABUTMENT
2526-012-044-2000
2526-012-034-2002
5699-000-039-0000
SSMH 6233, RIM=298.84
IE=290.93 8"ø (E)
SSMH 9041, RIM=266.34
IE=253.44 8"ø E
SDCB 9042, RIM=258.25
UNABLE TO OBTAIN IE 8"ø PVC S
IE=252.38 18"ø CPP N
IE=249.11 18"ø CPP SE
SDVT 9043, RIM=255.08
IE=247.17 8"ø PVC NW
SDVT 9045, RIM=253.76
IE=245.04 8"ø PVC E
SDCB 9049, RIM=249.84
IE=244.44 8"ø PVC W
IE=241.75 18"ø CPP NW
IE=241.74 18"ø CPP E
SSMH 9047, RIM=247.66
MID 8" CHANNEL
IE=239.13 (NW-E)
SSMH 9048, RIM=237.42
MID 8" CHANNEL
IE=228.14 (W-SE)
STORM CULVERT
IE=215.74 36"ø CPP
STORM CULVERT
IE=218.23 12"ø CPP
SDCB 9049, RIM=235.33
IE=226.19 18"ø CPP NW
IE=226.19 18"ø CPP S
SSMH 9053, RIM=225.48
MID 8" CHANNEL
IE=216.96 (W-SE)
TOP 18" PVC PIPE
STORM CULVERT
IE=206.52 18"ø PVC
STORM CULVERT
IE=206.70 18"ø PVC
STORM CULVERT
IE=194.36 36"ø CPP
STORM CULVERT
IE=189.82 12"ø CPP
STORM CULVERT
IE=175.36 12"ø CPP
STORM CULVERT
IE=170.80 12"ø CPP
SSMH 9054, RIM=220.83
MID 8" CHANNEL
IE=213.01 (NW-SE)
STORM CULVERT
IE=214.19 12"ø CPP
SSMH 9055, RIM=212.
MID 8" CHANNEL
IE=206.72 (NW-S)
STORM CULVERT
IE=206.96 12"ø CI
SDCB 9056, RIM=2(
IE=206.18 12"ø CPI
IE=206.14 12"ø CPI
SSMH 9100, RIM=1
MID 8" CHANNEL
IE=191.49 (W N-S)
SDCB 9099, BIRD
RIM=199.13
IE=197.11 12"ø CI
SDCB 8591, RIM
IE=189.23 12"ø
IE=189.24 12"ø
IE=188.37 24"ø
SDCB 8024, RIM=197.44
IE=195.57 12"ø CPP NW
IE=195.53 12"ø CPP S
STORM CULVERT
IE=195.37 12"ø CPP
SSMH 9101, RIM=197.59
MID 12" CHANNEL
IE=169.82 (E-S)
SDCB 8645, RIM=193.77
IE=190.59 12"ø CPP NE
SDMH 7532, RIM=204.83
IE=201.37 12"ø CPP NW
WITH OVERFLOW STRUCTURE
IE=201.23 12"ø CPP N
N 1°31'53" E
320.34'
S 1°33'28" W
440.12'
N 1°31'15" E
439.72'
N 1°29'16" E
343.47'
N 1°29'16" E
343.43'
S 89°05'37" E
494.33'
S 89°05'46" E
314.69'

From:	Craig
To:	City of Poulsbo Planning and Economic Development; Nikole CH. Coleman
Subject:	Pinnicle Development Project
Date:	Tuesday, June 30, 2026 11:42:13 AM

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June 29, 2026

Ms. Heather Wright Director Planning and Economic Development Department City of Poulsbo 200 NE Moe Street Poulsbo, WA 98370

Subject: Pinnacle at Liberty Bay PRD

I am writing to voice concerns about the Pinnacle at Liberty Bay PRD. I understand that the entrance/exit to the project has been eliminated at Bay Watch onto SR 305. This puts two entrances to the majority of the project within 112 feet of each other. This jeopardizes the safety of the residences of Crystal View Development during snow storms and fires. This is unacceptable and unsafe. The developer has done nothing to mitigate this problem. 115 units in the Pinnacle at Liberty Bay Project are depending on traveling through this tight area. Fire trucks will be barred from entering if a blaze occurs or snow conditions (the city already closes Sunrise Ridge Ave NE at the entrance to Crystal View and at the connection to Johnson Circle) between these two points not only will the Pinnacle project be in danger so will the residents of Crystal View. The developer must rerinstate the entrance to Hwy 305 on the Western side of the development.

In addition the density of housing units in the project is excessive. I understand the PRD allows descrition in the number of units per acre, allowing the density of the present plan is not discfretion but derilection of duty. Please reduce the number of allowed units to reflect that of the neighboring communities.

Thank You

Craig Bailey

17868 Sunrise Ridge Ave NE

Poulsbo, WA 98370

Concerned Resident of Crystal View/Sunrise Ridge Ave NE

July 1, 2026

City of Poulsbo Planning Department
200 NE Moe Street
Poulsbo, WA 98370

RE: Formal Opposition to Pinnacle at Liberty Bay Subdivision — TESC Plan Sheet PP-11

Dear Members of the Poulsbo Planning Department and City Council,

I am a resident and community member of the Crystal View neighborhood living directly on Sunrise Ridge Avenue NE and am writing to formally and strongly oppose the proposed Pinnacle at Liberty Bay Subdivision development as presented in Preliminary TESC Plan Sheet PP-11, prepared by Montebanc Management, LLC. While I recognize the region's need for thoughtful housing growth, this specific development as proposed poses unacceptable and potentially dangerous risks to public safety — most critically as a result of severe traffic impacts on the sole access road serving both existing residents and the proposed development.

I. Overview of Our Opposition

A review of the submitted TESC plan reveals a large-scale residential subdivision — encompassing more than 130 numbered lots — situated on a substantial tract of land within a SE 1/4 portion of Section 23, Township 26N, Range 1E, WM, in the City of Poulsbo. The plan calls for multiple new internal roadways including Road A connecting to NE Crystalía Court that would connect Pinnacle and Crystal View traffic, and that high volume expected is very concerning. However, it is strikingly apparent from the plan that the entire development, as well as the adjacent existing neighborhoods, funnels through a single, limited access corridor connecting to the State Highway 305.

This is not a minor traffic inconvenience. It is a critical infrastructure deficiency that jeopardizes the safety of current and future residents alike.

II. The Main Access Way Road Problem: A Life-Safety Crisis

The TESC plan clearly depicts that the entire subdivision — including all internal streets and proposed lots — ultimately connects to the broader road network through one main access way; Sunrise Ridge Avenue NE. This one-way-in, one-way-out arrangement is deeply problematic for the following reasons:

- Emergency Evacuation Risk: In the event of a wildfire, flooding, earthquake, or other emergency requiring rapid evacuation, more than 130 households — potentially 300 to 500 or more individuals — would be forced to exit through a

single road. A single accident, downed tree, utility pole, or blocked vehicle would render the entire community effectively trapped.

- Emergency Vehicle Access: Fire trucks, ambulances, and law enforcement vehicles would share the same singular corridor with evacuating or daily traffic. Delays in emergency response caused by congestion on this single road could be — and statistically will be — the difference between life and death for future residents.

- Traffic Volume Incompatible with Existing Road Capacity: The existing road network serving Sunrise Ridge Avenue NE was designed and constructed for the modest traffic volumes of the existing neighborhood. Adding 130+ new homes generates an estimated 1,200–1,500 additional daily vehicle trips (per standard ITE traffic generation rates). Routing all of this through a single access point will create chronic gridlock, dangerous queuing onto State Highway 305, and a significant increase in accidents.

- School and Peak-Hour Conflicts: During school drop-off and pick-up times, combined with standard AM and PM commute peaks, the single access road will face simultaneous surges of traffic that the road geometry cannot safely accommodate. Pedestrian safety — particularly for children — will be severely compromised.

- Construction-Phase Impact: During the multi-phase construction of this subdivision, heavy equipment, concrete trucks, grading machinery, and delivery vehicles will compound existing road stress. The TESC plan notes construction staging and truck access but fails to adequately account for the disruption this will cause to residents currently relying on the same road for their daily access.

III. Environmental and Drainage Concerns Compounding the Problem

The TESC plan acknowledges significant environmental sensitivities on this site — including multiple stream corridors (Streams B, C, and D), multiple wetland areas (Wetlands A, B, C, D, and E, including Category III and Category IV designations), and substantial stormwater management infrastructure including detention ponds and a pump-to-holding-pond system. These features, while partially addressed in the TESC design, present additional hazards that interact directly with the road access problem:

- Flood and Road Closure Risk: The presence of multiple streams and a substantial pump-to-retention-pond system on the site indicates that the area is subject to periodic flooding. If the single access road floods or becomes structurally compromised during a heavy rain event, the entire development would be cut off from emergency services and basic egress.

- Erosion and Road Stability: The extensive grading involved in developing this site across multiple phases, combined with proximity to wetland buffers, raises

legitimate concerns about soil erosion affecting the integrity of the access road itself during and after construction.

IV. Requests and Recommended Conditions

I respectfully, but firmly request that the City of Poulsbo Planning Department and City Council take the following actions before any approval is granted:

- Require a second independent access road as a condition of approval — this is both a traffic engineering best practice and a life-safety necessity for any development of this scale. No subdivision exceeding 50 units should be permitted with a single point of vehicular access under Poulsbo's own development standards.
- Commission a full independent Traffic Impact Analysis (TIA) conducted by a third-party transportation engineering firm — not one selected by the developer — to objectively assess cumulative traffic impacts on Sunrise Ridge Avenue NE, and the connection to State Highway 305.
- Require consultation with the Poulsbo Fire Department and Kitsap County Emergency Management to certify that the access road plan meets minimum emergency vehicle access and evacuation standards before any building permits are issued.
- Deny approval of this project in its current form until the single-access deficiency is fully resolved and independently verified.

V. Conclusion

My husband, John Mooney and I are not opposed to responsible development in our community. We are opposed to development that places profit ahead of the safety of those who will live, work, and raise families here. The Pinnacle at Liberty Bay Subdivision, as currently proposed, creates an untenable and foreseeable risk by concentrating 130+ new households onto a road network with key dependency on one main access way; Sunrise Ridge.

I urge the City of Poulsbo to uphold its obligation to protect public safety and to reject this application in its current form. I stand ready to participate constructively in any revised planning process that meaningfully addresses these concerns.

Respectfully submitted,



Katie Oertli Mooney
Resident, Crystal View Neighborhood

From:	Craig
To:	City of Poulsbo Planning and Economic Development; Nikole CH. Coleman
Subject:	Pinnicle Development Project
Date:	Wednesday, July 1, 2026 7:50:49 AM

June 29, 2026

Ms. Heather Wright Director Planning and Economic Development Department City of Poulsbo 200 NE Moe Street Poulsbo, WA 98370

Subject: Pinnacle at Liberty Bay PRD

I am writing to voice concerns about the Pinnacle at Liberty Bay PRD. I understand that the entrance/exit to the project has been eliminated at Bay Watch onto SR 305. This puts two entrances to the majority of the project within 112 feet of each other. This jeopardizes the safety of the residences of Crystal View Development during snow storms and fires. This is unacceptable and unsafe. The developer has done nothing to mitigate this problem. 115 units in the Pinnacle at Liberty Bay Project are depending on traveling through this tight area. Fire trucks will be barred from entering if a blaze occurs or snow conditions (the city already closes Sunrise Ridge Ave NE at the entrance to Crystal View and at the connection to Johnson Circle) between these two points not only will the Pinnacle project be in danger so will the residents of Crystal View. The developer must rerinstate the entrance to Hwy 305 on the Western side of the development.

In addition the density of housing units in the project is excessive. I understand the PRD allows descrition in the number of units per acre, allowing the density of the present plan is not discfretion but derilection of duty. Please reduce the number of allowed units to reflect that of the neighboring communities.

Thank You

Craig Bailey

17868 Sunrise Ridge Ave NE

Poulsbo, WA 98370

From: Andrew Hitchings
To: City of Poulsbo Planning and Economic Development
Subject: Fwd: Pinnacle at Liberty Bay PRD & Preliminary Subdivision - Public Meeting Postponement
Date: Tuesday, June 30, 2026 3:43:10 PM

Dear Ms. Coleman,

Thank you for providing this public notice regarding the postponement of the July 7th Planning Commission meeting.

I want to extend my sincere appreciation to you, the Planning and Economic Development department, and the city's engineering staff for your diligent oversight. Halting the process to ensure the applicant strictly complies with the City's adopted engineering, roadway design, and construction standards is a critical step in protecting public safety and maintaining the structural integrity of our local neighborhoods.

Please keep me on the distribution list for all future public notices regarding this project. I look forward to reviewing the developer's updated roadway designs, profiles, and technical revisions on the project portal as soon as they are made available to the public.

Thank you again for your time and your commitment to enforcing Poulsbo's development standards.

Sincerely,

Andrew Hitchings

Poulsbo Resident
Crystal View

From:	Andrew Hitchings
To:	City of Poulsbo Planning and Economic Development
Cc:	City Clerks
Subject:	Technical Deficiencies and Dispositions - Pinnacle at Liberty Bay PRD
Date:	Tuesday, June 30, 2026 3:54:18 PM
Attachments:	Structural Risk and Case Studies of Retaining Wall Failures.pdf

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Subject: Technical Deficiencies and Dispositions - Pinnacle at Liberty Bay PRD

Dear Members of the Poulsbo Planning Commission,

As you review the upcoming resubmittals for the Pinnacle at Liberty Bay Planned Residential Development (PRD), we want to bring to light four critical areas where the applicant's current submittals attempt to minimize, obscure, or work around established safety and environmental standards.

While permanent legislative changes take time, **the Planning Commission currently possesses the administrative authority under existing Poulsbo Municipal Code (PMC) to deny or condition this project** to prevent these workarounds. Here is how the developer is attempting to bypass standard engineering protections and what the Commission can do right now to stop it:

- **1. Bypassing Proper Road Infrastructure via Existing Road Ends:** The developer is attempting to route heavy traffic and an un-engineered, hazardous 16% to 21% grade break directly onto the quiet residential cul-de-sacs of NE Crystalia Court and Baywatch Court to avoid the cost of building a compliant access road out to SR 305.
    - *What the Commission can do now:* Exercise your authority under **PMC Title 18 (PRD Design Standards)** to determine that this connection creates an unsafe intersection. You can formally condition the preliminary plat to require primary access from the highway frontage, restricting neighborhood road ends to secondary emergency vehicle access (EVA) only.
- **2. Shifting Soil Instability Risks to Future Homeowners:** In their Geotechnical Addendum, the developer's consultants use fine-print liability disclaimers, admitting that subterranean soil and groundwater variations "cannot be fully verified prior to construction," yet they expect the City to approve a high-density layout over a vulnerable slope.
    - *What the Commission can do now:* Refuse to accept selective test-hole data. Demand that the developer conduct comprehensive, deep sub-surface boring and compaction modeling along the entire footprint of all proposed roadways and retaining infrastructure *as a condition of completeness* before this application is allowed back on the public hearing calendar.
- **3. Exploiting Environmental Database Delays:** The developer is using single-visit, dry-season observations and backlogs in the state Forest Practices Application Review System (FPARS) to downplay critical salmonid stream classifications, directly contradicting the multi-year spawning data provided by the Suquamish Tribe Natural Resources Department.

    - *What the Commission can do now:* Under Chapter 16.20 PMC (Critical Areas), the Planning Commission has the right to favor the best available local science. You can formally accept the Suquamish Tribe’s objections, reject the developer's minimized 75-foot buffer, and enforce a non-waivable 150-foot stream setback.

- **4. Building Industrial-Scale Retaining Walls in Common HOA Tracts:** The developer’s layout relies on massive retaining walls to artificially flatten unbuildable slopes. They are attempting to tuck these massive civil engineering structures into shared HOA "common tracts," ensuring that once their single-project LLC is dissolved, the long-term structural liability falls entirely on future neighbors and the City.

    - *What the Commission can do now:* Demand full, transparent vertical profiles of all retaining walls and enforce strict compliance with **PMC 18.260.070(A)**. Determine that these massive structures are incompatible with the perimeter boundaries of the adjacent traditional neighborhood and reject the layout.

Thank you for your rigorous technical oversight and for halting the July 7th meeting to enforce Poulsbo's engineering standards. We ask that you continue to hold this applicant to the absolute letter of the law.

Sincerely,

Andrew Hitchings

Poulsbo Resident & Representative of Crystal View

Attached to this proposal is a comprehensive engineering and legal PDF mapping out the structural risks of tall retaining walls, alongside a documented list of catastrophic wall failures across the country that have bankrupted HOAs and forced municipal tax bailouts.

From:	Andrew Hitchings
To:	City Clerks
Cc:	City of Poulsbo Planning and Economic Development; Ed Stern; Council Members
Subject:	Proposal for Infrastructure Integrity & Neighborhood Safety Ordinance - Closing Code Loopholes
Date:	Tuesday, June 30, 2026 4:05:34 PM
Attachments:	Structural Risk and Case Studies of Retaining Wall Failures.pdf

Dear Poulsbo City Councilmembers,

The recent public postponement of the Pinnacle at Liberty Bay PRD application has exposed severe, systemic loopholes in the Poulsbo Municipal Code (PMC). Currently, the code allows large-scale development firms to utilize "omission by silence," single-project corporate shells, and boilerplate legal disclaimers to wave away long-term infrastructure, environmental, and structural safety risks.

When a developer cuts corners on massive hillside retaining walls, severe grade breaks, or watershed protections, they pocket the immediate profit and walk away, leaving local homeowners, HOAs, and Poulsbo taxpayers to foot the multi-million-dollar cleanup bills when those systems inevitably fail years down the line.

We are asking the City Council to exercise its legislative authority to introduce an **Infrastructure Integrity and Neighborhood Safety Ordinance** package to close these loopholes for all future builders via four targeted code amendments:

- **Amendment 1 (Access Protection):** Amend PMC Title 12 and 18 to establish a "Proportional Traffic Cap." Existing residential stub roads or cul-de-sacs may not be used for primary subdivision access if the incoming project increases daily trip volumes on that street segment by more than 15%. High-density projects bordering state routes or arterials must draw primary access from those corridors.

- **Amendment 2 (Topographical Safety):** Amend PMC Title 19 to mandate that any project featuring a grade break exceeding 2% must submit fully engineered vertical curve profiles and certified sight-distance calculations at the initial application phase, or the application is legally deemed "incomplete."

- **Amendment 3 (Data Primacy):** Amend PMC Chapter 16.20 to require that when a sovereign Tribe or regional conservation district provides documented habitat or stream data, the City must legally default to that localized data over backlogged state database tracking systems (such as FPARS).

- **Amendment 4 (Retaining Wall Liability Shield - Option A or B):**

    - *Option A:* Require a mandatory 20-year structural maintenance cash bond funded by the developer, alongside a permanent geotagged digital "As-Built" ledger attached to the property deed, ensuring corporate funds are secured for future failures.

    - *Option B:* Implement a hard 6-foot height restriction on all residential plat retaining structures, forcing developers to adapt layouts to the natural landscape rather than creating high-risk, multi-story earthen terraces.

Attached to this proposal is an engineering and legal addendum mapping out the structural risks of tall retaining walls, alongside a documented list of catastrophic wall failures across the country that have bankrupted HOAs and forced municipal tax bailouts.

We would appreciate the opportunity to sit down with you or the Planning and Economic Development committee to discuss introducing these common-sense, proactive protections for Poulsbo's neighborhoods.

Sincerely,

Andrew Hitchings

Poulsbo Resident & Representative of Crystal View

(Attach the document below to the City Council Email)

ADDENDUM: Structural Risk and Case Studies of Retaining Wall Failures

Section 1: The Exponential Risk of Wall Height

The structural forces acting on a retaining wall do not scale linearly with height; they scale **exponentially**. A 20-foot tall retaining wall experiences roughly **eleven times** the lateral earth pressure and overturning forces of a 6-foot wall. When developers build 15-to-25-foot walls, they are installing industrial-scale civil engineering projects directly inside residential zones.

These walls typically fail due to underground **hydrostatic pressure** (water building up behind the wall when subsurface drainage layers are poorly installed or omitted to save money). Because these components are completely buried, municipal inspectors cannot easily verify their long-term integrity before they are filled with dirt.

Section 2: Real-World Case Studies of Structural Dumping

The following precedents demonstrate exactly how large-scale retaining wall and slope shortcuts turn into catastrophic public and private liabilities:

- **The Rivermist Failure (San Antonio, Texas):** A developer constructed massive, tiered retaining walls to maximize flat home sites on a steep hillside, cutting corners on underlying drainage. Within a few years, the massive walls spectacularly buckled, forcing the emergency evacuation of dozens of brand-new homes. While a national builder was forced by immense public pressure to buy back homes in this instance, smaller local developers and single-project LLCs simply do not have the capital or corporate longevity to fund such remediation.
- **The Bella Vista Landslide (Johnson County, Kansas):** A developer utilized a massive, engineered block retaining wall to support a high-density development. Years later, the wall suffered a catastrophic drainage failure, causing a slow-motion landslide that dragged homes down the bluff. Because the developer had long since dissolved their project-specific LLC, the volunteer HOA was left completely bankrupt trying to fund multi-million-dollar stabilization efforts, and the local municipality was forced into a multi-year legal battle to protect public utilities at the base of the collapsing hill.
- **Western Washington Premises Liability Precedents (Kitsap & Pierce County Lessons):** In local Washington courts (such as *Scheetz v. City of Gig Harbor*), municipalities consistently find themselves pulled into expensive litigation when boundaries, slopes, or common tracts fail. When a developer tucks a massive wall into an HOA "common tract" and exits, the volunteer HOA inevitably faces bankruptcy when hit with a $50,000-per-household special assessment to fix a bowing wall. When the HOA defaults, the moving mass of earth threatens public roadways, snaps water mains, and crushes sewer lines, forcing the City to declare an emergency and use public public-works funds—taxpayer dollars—to bail out the developer's original design shortcut.

June 23rd, 2026

Planning Commission and City Staff

City of Poulsbo

200 NE Moe Street

Poulsbo, WA

Sent via email]

Re: Pinnacle at Liberty Bay PRD

Dear Commissioners and Staff

I'm a homeowner, residing in the Crystal View neighbourhood and I respectfully submit the following comments regarding the proposed Pinnacle at Liberty Bay PRD.

I appreciate the City's decision to issue a revised Notice of Application and to provide a second public comment period. The City's June 2026 review comments indicate that significant issues remain unresolved regarding transportation, project access, retaining structures, geotechnical support, and other aspects of the proposal.

As a neighboring resident, I am concerned that the project may be moving forward before the project applicant has provided sufficient information to demonstrate compliance with applicable City requirements.

In particular, I encourage the City to carefully evaluate the following issues before making any recommendation for approval:

- Whether the proposed development is consistent with the existing residential environment of the adjacent Crystal View subdivision.

- Whether sufficient information has been provided regarding the retaining structures proposed along portions of the western and southern boundaries of Crystal View, including their purpose, design, long-term implications and general characteristics.

- Whether the project circulation system and the proposed completion and opening of the Sunrise Ridge Avenue S-curve section have been fully analyzed with respect to public safety, area transportation, and Pinnacle access considerations.

- Whether the Applicant has adequately responded to the issues identified by City Engineering in its June 2026 review comments.

I'm not asking the City to deny development. Rather, I'm asking the City to ensure that the Applicant demonstrates compliance with applicable requirements and that important unresolved issues are addressed before the project proceeds further in the review process.

The City's recent review comments suggest that substantial questions remain. I respectfully request that those questions be fully resolved before any recommendation of approval is made.

I purchased my home in July 2023. What drew me to Crystal View were a few things; proximity to the beautiful town of Poulsbo, the mountains and water that surrounds us, and very specifically, within this community, the quiet, peace and space between homes. I volunteer raising service dogs for Canine Companions, an organization that provides service dogs free of charge to those in need. I was able to buy a home with a large, fenced yard that is perfect for raising these beautiful dogs. I don't have an endless supply of money to spend so I carefully planned the purchase of my home, believing that I was making a sound investment for my future.

Within the space of just 3 years, the situation has changed dramatically. Because of the prospect of the looming Pinnacle PRD, plus Audrey Estates, my community is going to be turned upside down. We are already seeing an impact on property sales as a direct result of the threat of Pinnacle specifically, whether that is because the homes will directly bound the new development, or because of the impact of the vastly increased traffic utilizing Sunrise Ridge Avenue. There are 2 homes in Crystallia Court which have both been listed and neither of which has sold, one having held 2 open days with no viewings.

It seems to me, a lay person to be entirely counter-productive for the City to allow development that attracts residents and therefore tax dollars to Poulsbo, whilst snubbing those already in residence by deeply adversely affecting their property values. This does not seem to be a sensible future plan for Poulsbo. Why would people continue to spend their money on homes here when the data starts to show that property values drop within 3 years because of aggressive over-development?

The density of homes very specifically in the proposed Pinnacle PRD is simply not consistent with our neighborhood , despite there being City ordinances which are designed to protect existing neighborhoods from proximal development. I urge the City PD to closely review every aspect of the proposed Pinnacle development, and to be deeply mindful about current residents and the future of this beautiful town.

Thank you for your consideration

Yours faithfully

Lee-Ann Comrie, 1783 NE Crystal View Ct

Poulsbo, WA 98370

June 25, 2026

Ms. Nikole Coleman
Planning Manager
Planning and Economic Development Department
City of Poulsbo
200 NE Moe Street
Poulsbo, WA 98370

Re: Pinnacle at Liberty Bay Planned Residential Development and Preliminary Subdivision

Second Public Comment Period – Retaining Structures and PMC 18.260.130

Dear Ms. Coleman:

Please accept this letter as a supplemental submission regarding the approximately 1,000 linear feet of retaining structures depicted in civil plan drawings for the Pinnacle PRD project as being located within a proposed tract or easement along the western and southern boundaries of the existing Crystal View subdivision.

We respectfully request that this letter be included in the project record and provided to the Planning Commission in advance of its consideration of the Pinnacle application.

As background, attached for ease of reference is our previous correspondence addressing these retaining structures. Since submission of that letter, the Planning Director has issued two Administrative Interpretations addressing, among other matters, the level of information required during review of a Planned Residential Development and Preliminary Plat application under PMC Chapter 18.260. Those Interpretations discuss the requirement that preliminary subdivision plans identify the location of proposed retaining walls, indicate their height and construction materials, and disclose their general characteristics so that the proposal may be meaningfully evaluated during the entitlement process.

The Applicant has previously indicated that detailed engineering associated with the retaining structures will occur during subsequent grading and building permit review. Applicant has also previously advised that the identity of any future builder or builders has not yet been determined.

We recognize that detailed structural engineering is ordinarily performed after land use approval. Nevertheless, regardless of who ultimately constructs the project, the present Applicant is the entity requesting approval of the Planned Residential Development and Preliminary Subdivision. Accordingly, the questions below are directed not to future engineering decisions, but to the

information that the Applicant contends presently exists within the project record and upon which it relies in requesting approval of approximately 1,000 linear feet of permanent engineered retaining structures proposed to be built in project spaces along the western and southern boundaries of the Crystal View subdivision.

The purpose of these questions is therefore straightforward. We respectfully request that the Applicant identify the information presently contained within the project record that the Applicant believes permits the Planning Commission and, ultimately, the Hearing Examiner to conclude that these retaining structures have been sufficiently disclosed and evaluated at the present stage of project review.

For purposes of this letter, the term "subject retaining structures" refers exclusively to the approximately 1,000 linear feet of retaining structures depicted in the Applicant's successive civil plan submissions along the property boundaries where the Pinnacle PRD is adjacent to the western and southern property sides of the existing Crystal View subdivision, whether those structures are positioned in proposed project tracts, project easements, or otherwise.

A. Questions Presented

Question 1

The Administrative Interpretations state that preliminary subdivision application materials are to identify the location of proposed retaining walls, indicate their height and construction materials, and disclose their general characteristics so that the proposal may be meaningfully evaluated during the entitlement process.

Does the Applicant contend that the present project record adequately satisfies those requirements with respect to the subject retaining structures?

If so, please identify where within the current project record those disclosures may be found.

Question 2

The Applicant has previously indicated that detailed engineering associated with the retaining structures will occur during subsequent grading and building permit review.

What information presently contained within the project record does the Applicant contend permits the Planning Commission and Hearing Examiner to evaluate the subject retaining structures during the Planned Residential Development and Preliminary Subdivision review process?

Please identify the documents, plans, reports, analyses, or other portions of the project record upon which the Applicant relies.

Question 3

Please identify the engineering analyses, geotechnical investigations, or other technical information upon which the Applicant presently relies in concluding that the subject retaining structures are feasible as presently depicted.

Question 4

Does the Applicant contend that the present project record contains sufficient information to support its conclusion that the subject retaining structures can be constructed entirely from property owned or controlled by the Pinnacle project without entering neighboring Crystal View properties?

If so, please identify the portions of the project record upon which the Applicant relies.

Question 5

The Applicant has indicated that the retaining structures will ultimately be owned and maintained by the Pinnacle Homeowners Association.

Please identify the mechanism presently contemplated to ensure long-term inspection, ongoing maintenance, repair, replacement, drainage maintenance, and funding associated with those retaining structures, including whether the Applicant anticipates relying solely upon HOA Covenants, Conditions and Restrictions or also upon a separate recorded inspection and maintenance agreement.

Question 6

Please identify the portions of the present project record that the Applicant contends address the relationship between the proposed retaining structures and adjacent Crystal View properties with respect to existing grades, drainage, lateral support, and long-term maintenance access.

Question 7

Please identify any Planned Residential Development or subdivision within the City of Poulsbo that the Applicant contends presents retaining structures of comparable aggregate length, function, and relationship to an existing residential subdivision and, if so, please explain how that project informed the design of the current proposal.

B. Prior Correspondence and Supporting Materials

Attached for reference and incorporation into the record are:

Attachment A - Administrative Interpretation (P-03-02-26-01), dated March 30, 2026

Attachment B - Administrative Interpretation No. 2 (P-06-01-26-01), dated June 22, 2026

Attachment C - Lockhart Letter; Subject: Pinnacle at Liberty Bay PRD – Retaining Structure Feasibility and Record Sufficiency, Dated March 10, 2026

Conclusion

The questions presented above are not intended to request final engineering design or construction-level detail. Rather, they are intended to assist the Planning Commission and, ultimately, the Hearing Examiner in determining whether the present project record contains sufficient information to permit informed evaluation of the subject retaining structures.

We respectfully request that the Applicant's responses be included in the public record so that these matters may be evaluated on a complete and well-developed record.

Thank you for your consideration.

Respectfully submitted,

Dana Lockhart

Katharine Lockhart

cc: Crystal View Homeowners Association

Docusign Envelope ID: 9B4274EA-75EB-417F-8225-FBB3F33740CA

Attachment A

PLANNING AND ECONOMIC DEVELOPMENT

Administrative Interpretation

200 NE Moe Street | Poulsbo, Washington 98370
(360) 394-9748 | fax (360) 697-8269
www.cityofpoulsbo.com | plan&econ@cityofpoulsbo.com

To: Planning and Economic Development Department

From: Heather Wright, AICP

Subject: Administrative Interpretation - Lockhart

Date: March 30, 2026

Question:

The City received a request for an Administrative Determination regarding the interpretation and application of provisions of Poulsbo Municipal Code (PMC) Chapter 18.260 – Planned Residential Development (PRD) in connection with the review of a proposed PRD and Preliminary Subdivision.

The request seeks clarification regarding:

1. Whether PMC 18.260.130 (Submittal Requirements) requires retaining wall construction materials to be identified on submitted civil plans.
2. How PMC 18.260.070 (Planned Residential Development Site Design Criteria) should be interpreted when a PRD is proposed adjacent to an existing subdivision developed under traditional subdivision standards.
3. The relationship between the design consistency requirement in subsection (A) and the screening requirements in subsection (B).
4. The role and authority of City staff, the Planning Commission, and the Hearing Examiner in evaluating compliance with the requirements of PMC 18.260.070.

This interpretation provides clarification on the application of these provisions of the PMC.

The request includes a number of specific questions regarding the interpretation and application of PMC 18.260.070. This administrative interpretation addresses the relevant provisions of the PMC necessary to clarify how the code is applied. The interpretation is not intended to respond to each question individually but rather to clarify the applicable code provisions and the framework under which they are applied. Finally, this administrative interpretation does not constitute a determination regarding whether any specific development proposal satisfies the applicable design criteria.

Background:

Chapter 18.260 of the Poulsbo Municipal Code establishes standards for PRDs. PRDs are intended to provide flexibility in site design while ensuring that development remains compatible with surrounding neighborhoods and consistent with the intent of the Comprehensive Plan and underlying zoning district.

The proposed PRD subdivision would be located on property zoned Residential Low (RL) and shares boundaries with existing residential neighborhoods that were developed under traditional subdivision standards with larger lot sizes.

Clarification has been requested regarding the application of PMC 18.260.070(A), which requires that when a PRD is proposed adjacent to an existing single-family residential zone developed utilizing traditional subdivision standards and lot sizes of 7,500 square feet or greater, the PRD must be designed so as to be consistent with the single-family residential environment at its adjacent perimeter.

Clarifications were also requested regarding whether screening elements such as walls, fences, landscaping, or buffer tracts affect the applicability of the adjacency requirement and whether such screening may substitute for compliance with the design consistency requirement.

Additionally, clarification was requested regarding PMC 18.260.130(E), which requires subdivision or site plans to indicate the location, height, and construction materials of walls and fences.

Docusign Envelope ID: 9B4274EA-75EB-417F-8225-FBB3F33740CA

Because PRDs involve discretionary review and evaluation of site design, interpretation of these provisions is necessary to clarify how the code is applied during the development review process.

Interpretation:

1. *Submittal Requirements for Retaining Walls*

   PMC 18.260.130, Application Submittal Requirements, states that an application for a Planned Residential Development must contain the submittal requirements identified in the applicable application form. Because a PRD that creates lots also requires preliminary subdivision approval, the application must also meet the applicable preliminary subdivision submittal requirements.

   The preliminary subdivision application materials require that plans identify the location of existing and proposed walls and fences and indicate their height and construction materials. This requirement ensures that the City and reviewing authorities can understand the general location and scale of proposed screening or structural features that may affect adjacent properties.

   At the preliminary subdivision stage, these plans are conceptual in nature and are intended to demonstrate the proposed layout and general characteristics of the development. Detailed engineering design and construction specifications are typically addressed during subsequent phases of project review.

   Accordingly:

   - Preliminary plans must show the location and general characteristics of proposed walls or fences.
   - Final engineering design, structural specifications, and construction details are typically provided during grading permit and civil plan review.

   The purpose of the preliminary subdivision requirement is to ensure that proposed screening and structural features are identified early in the review process so their relationship to surrounding properties and site design can be evaluated. The requirement does not replace the more detailed review that occurs during civil engineering and construction permitting.

2. *Applicability of PMC 18.260.070(A) – Design Consistency Requirement*

   PMC 18.260.070(A) applies when a PRD is proposed adjacent to an existing single-family residential zone which has been developed utilizing traditional city subdivision development standards and lot sizes of 7,500 square feet or larger.

   For purposes of interpreting this provision, the definitions contained within the Poulsbo Municipal Code apply.

   > "Abutting" means contiguous or adjoining with a common boundary line, except that where two or more lots adjoin only at a corner or corners, they shall not be considered as abutting unless the common property line between the two parcels measures eight feet or more in a single direction. The term includes the terms adjacent, adjoining, and contiguous.
   >
   > "Adjacent" means abutting or located directly across a street right-of-way.

   The phrase "adjacent perimeter" refers to the portion of the project boundary where the PRD site is adjacent to an existing subdivision or residential zone. The code does not require that all portions of the PRD perimeter meet the adjacency condition, nor does it require that every individual lot within the PRD be adjacent to the neighboring subdivision. Rather, the requirement applies to the portion of the project perimeter where adjacency exists.

   Based on these definitions, a PRD is considered adjacent to an existing subdivision when the project site shares a common boundary with the subdivision or is located directly across a street right-of-way from the subdivision.

   PMC 18.260.070(A) states that when a PRD is proposed adjacent to such development, the PRD shall be designed so as to be consistent with the single-family residential environment at its adjacent perimeter. The provision further states that the review authority may require the PRD to make provisions such as matching lot sizes, lot widths, or house height and scale (or other provisions as deemed appropriate) for those lots that are located adjacent to the existing subdivision.

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The use of the word "may" indicates that the code provides discretionary authority to the review authority to determine whether such provisions are necessary to address compatibility at the adjacent perimeter. The examples listed in the code are illustrative tools that the review authority may apply where appropriate. The code does not require that any specific design provision be imposed in every case, nor does it establish a prescriptive formula for achieving compatibility.

Accordingly, PMC 18.260.070(A) establishes that when adjacency exists, the PRD must be evaluated for compatibility with the surrounding residential environment, and the review authority retains discretion to determine whether specific design provisions are necessary to address that relationship.

3. *Interpretation of "Single-Family Residential Environment"*

PMC 18.260.070(A) requires that when a PRD is proposed adjacent to an existing single-family residential zone developed utilizing traditional subdivision standards and lot sizes of 7,500 square feet or larger, the PRD shall be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter.

The PMC does not provide a specific definition of the term "environment" as used in this provision. In the absence of a defined term, words and phrases are interpreted according to their plain and ordinary meaning within the context of the regulation.

Within the context of PMC 18.260.070(A), the phrase "single-family residential environment" refers to the overall physical and visual character typically associated with a traditional single-family residential neighborhood.

This environment may include characteristics such as:

- Housing type and orientation
- Lot configuration and spacing
- Building scale and massing
- Relationship of structures to adjacent properties
- Streetscape patterns and neighborhood layout
- Landscaping, buffering, and visual transitions between developments

The code does not prescribe specific quantitative thresholds for these characteristics. Instead, the provision establishes a performance-based design standard intended to ensure compatibility between new PRD development and existing single-family neighborhoods at the project perimeter.

Accordingly, the phrase "single-family residential environment" is not limited solely to the presence of single-family detached homes. Rather, it encompasses the broader physical and visual characteristics that contribute to the overall residential character of the surrounding neighborhood.

The evaluation of whether a proposed PRD is consistent with the single-family residential environment at its adjacent perimeter is conducted through the City's development review process and considered by the review authority as part of the project's overall design review.

In addition, the PMC defines "Dwelling, single-family" as *a building containing but one kitchen, except* where *a valid accessory dwelling unit has been approved.*

This definition focuses on the type of residential structure, specifically the presence of a single dwelling unit within a building. The definition does not reference or distinguish between the method by which a lot is created, such as whether the dwelling is located within a traditional subdivision or within a Planned Residential Development.

Accordingly, a single-family dwelling retains the same definition regardless of whether it is located within a subdivision created through traditional subdivision standards or within a PRD. The regulatory mechanism used to create lots or organize a development pattern does not alter the underlying definition of a single-family dwelling.

Therefore, the phrase "single-family residential environment" in PMC 18.260.070(A) should be understood to refer to the broader physical and visual character of a neighborhood composed primarily of single-family dwellings, rather than the specific subdivision process used to create the lots on which those dwellings are located.

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4. *Role of the Review Authority and Application of PMC 18.260.070(A)*

Planned Residential Developments and preliminary subdivisions are reviewed through the City's Type III land use process. Under this process, City planning staff conduct the technical review of the application and prepare a staff report and recommendation addressing compliance with applicable provisions of the PMC. The Hearing Examiner serves as the decision-making authority and issues the final decision on the application.

Accordingly, the determination of whether a proposed PRD satisfies the requirements of PMC 18.260.070(A) is made through the development review process and is ultimately determined by the Hearing Examiner based on the full record, including staff analysis, application materials, and public testimony.

PMC 18.260.070(A) establishes both a mandatory design objective and discretionary authority for the review authority. The first sentence states that when a PRD is proposed adjacent to an existing single-family residential zone developed utilizing traditional subdivision standards and larger lot sizes, the PRD shall be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter. The use of the word "shall" establishes a required design standard that must be considered during review of the proposed development.

The second sentence of the subsection states that the review authority may require the PRD to make provisions such as matching lot sizes, lot widths, or house height and scale, or other provisions as deemed appropriate for those lots located adjacent to the existing subdivision. The use of the word "may" indicates that the code provides the review authority with discretion to determine whether such provisions are necessary to address compatibility at the adjacent perimeter.

The examples listed in the code, such as matching lot sizes, lot widths, or house height and scale, are illustrative rather than mandatory requirements. The code authorizes the review authority to require such measures where appropriate but does not require that any particular design provision be imposed in every case.

If the review authority determines that a proposed PRD does not satisfy the applicable decision criteria or development standards of the Poulsbo Municipal Code, the Hearing Examiner retains the authority provided under the City's land use procedures to approve the application, approve the application with conditions, deny the application, or remand the application for additional review or modification, consistent with the applicable procedures and decision criteria of the municipal code.

PMC 18.260.070 also includes additional requirements in subsection (B), which apply in addition to subsection (A) where applicable. Each subsection establishes separate requirements within the PRD design framework. Compliance with one provision does not eliminate the applicability of other provisions unless expressly stated in the code.

Finally, the second sentence of PMC 18.260.070(A) limits the potential design provisions that may be required by the review authority to those lots located adjacent to the existing subdivision, which reflects the purpose of the section to address compatibility at the perimeter where differing development patterns may meet. This provision preserves discretion for the review authority while focusing potential design responses on the portion of the development where adjacency occurs.

5. *Application to the Pinnacle at Liberty Bay PRD*

The Pinnacle at Liberty Bay PRD is currently under review through the City's development review process. As part of that review, the proposed PRD has been evaluated for adjacency to surrounding residential neighborhoods consistent with the definitions and interpretation described above.

Consistent with PMC 18.260.070(A), the review authority retains discretion to determine whether specific design provisions are necessary to ensure compatibility between the proposed development and existing surrounding neighborhoods.

Additional analysis and findings related to the application of PMC 18.260.070(A) to the Pinnacle PRD may be included as part of the project's development review record and decision.

This administrative interpretation clarifies how the applicable provisions of the PMC are interpreted and applied. It does not constitute a determination regarding whether any specific development proposal satisfies the

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applicable design criteria. That determination is made through the City's development review process and ultimately by the Hearing Examiner based on the full record.

6. Relationship Between Subsections (A) and (B)

   PMC 18.260.070(B) establishes requirements for perimeter screening, including fencing, landscaping, or other buffering measures where a PRD abuts existing residential zones.

   Subsection (B) expressly states that these screening provisions apply "in addition to subsection A."

   Because subsection (B) is written as an additional requirement, it does not replace or eliminate the design consistency requirement contained in subsection (A). Instead, screening measures are intended to mitigate visual impacts and provide buffering between developments, while subsection (A) addresses the broader issue of overall neighborhood compatibility and design character.

   Accordingly:

   - Compliance with screening requirements does not substitute for compliance with the design consistency requirement.
   - Screening measures may be used to assist in achieving compatibility but do not independently satisfy the requirement of subsection (A).

Conclusion:

PMC 18.260.130 requires subdivision and PRD plans to identify the location, height, and general characteristics of walls and fences. At the preliminary review stage, plans are conceptual in nature and are intended to demonstrate the general layout and characteristics of the proposed development. Identification of the general location and height of walls or fences is sufficient at this stage, with detailed engineering design and construction specifications typically provided during subsequent grading permit and civil plan review.

PMC 18.260.070(A) establishes a project-level design requirement that when a PRD is proposed adjacent to an existing single-family residential zone developed utilizing traditional subdivision development standards and lot sizes of 7,500 square feet or greater, the PRD must be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter. This requirement is triggered when adjacency exists between the PRD site and such development and applies to the portion of the project perimeter where that adjacency occurs. The provision does not require that every individual lot within the PRD be adjacent to the existing subdivision.

PMC 18.260.070(A) further provides the review authority with discretion to determine whether specific design provisions—such as matching lot sizes, lot widths, or house height and scale—are necessary to achieve compatibility at the adjacent perimeter. The examples listed in the code are illustrative measures that may be applied where appropriate and are not mandatory in all cases.

PMC 18.260.070(B) establishes screening requirements that apply in addition to the design consistency requirement in subsection (A). Screening measures such as fencing, landscaping, or buffering are intended to mitigate visual impacts between developments but do not replace or substitute for the design consistency requirement.

Determination of whether a proposed PRD satisfies the applicable provisions of PMC 18.260.070 is made through the City's discretionary development review process. Planning staff conduct the technical review of the application and provide analysis and recommendations, and the Hearing Examiner serves as the decision-making authority who evaluates the full record and determines whether the proposal satisfies the applicable provisions of the Poulsbo Municipal Code.

This administrative interpretation clarifies the meaning and application of the relevant provisions of the Poulsbo Municipal Code and does not constitute a determination regarding whether any specific development proposal satisfies those provisions.

Authority:

PMC 18.300.020 authorizes the Planning Director to make administrative determinations and interpretations regarding the application of provisions of Title 18. Such determinations must be consistent with the spirit and intent of the Poulsbo Municipal Code and the Comprehensive Plan.

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Formal interpretations issued by the Planning Director are maintained by the Planning and Economic Development Department and serve as guidance for the consistent administration of the City's development regulations.

Authority:

The decision is final. This decision may be appealed to the Hearing Examiner within 14 days. The written appeal, appeal fee, and deposit must be received by the PED department no later than 4:30 p.m. on Monday, April 13th, 2026.

Signed by:
Heather Wright
EAC69A034B784AD...

Heather Wright, AICP, Planning and Economic Development Director

3/30/2026
Date

Docusign Envelope ID: E40884F5-C47D-860C-8043-6F736582929C

Attachment B

PLANNING AND ECONOMIC DEVELOPMENT

Administrative Interpretation

200 NE Moe Street | Poulsbo, Washington 98370
(360) 394-9748 | fax (360) 697-8269
www.cityofpoulsbo.com | plan&econ@cityofpoulsbo.com

To: Planning and Economic Development Department

From: Heather Wright, AICP

Subject: Administrative Interpretation No. 2 – Lockhart | P-06-01-26-01

Date: June 22, 2026

Question:

The City received a request for an Administrative Determination regarding the interpretation and application of provisions of the Poulsbo Municipal Code (PMC) Chapter 18.260 – Planned Residential Development (PRD).

The request seeks clarification regarding:

1. Whether the terms "consistent" and "compatible" constitute separate regulatory standards under PMC 18.260.070(A).
2. What portion of a PRD is relevant when evaluating consistency with the single-family residential environment at the adjacent perimeter.
3. The interaction between PMC 18.260.070(A) and PMC 18.260.070(B) when screening measures are required or authorized under subsection (B).
4. The meaning of the phrase "general characteristics" as it relates to walls and similar structural features depicted on preliminary subdivision plans.

This interpretation provides clarification on the application of these provisions of the PMC.

The request includes a number of specific questions regarding the interpretation and application of PMC 18.260.070 and PMC 18.260.130. This administrative interpretation addresses the relevant provisions of the PMC necessary to clarify how the code is applied. The interpretation is not intended to respond to each question individually but rather to clarify the applicable code provisions and the framework under which they are applied. Finally, this administrative interpretation does not constitute a determination regarding whether any specific development proposal satisfies the applicable design criteria.

Background:

Chapter 18.260 of the PMC establishes standards for Planned Residential Developments (PRDs). PRDs are intended to provide flexibility in site design while ensuring that development remains consistent with the intent of the Comprehensive Plan and underlying zoning district.

On March 30, 2026, the Planning Director issued an Administrative Interpretation (P-03-02-26-01) addressing various provisions of PMC Chapter 18.260, including the interpretation of PMC 18.260.070 and PMC 18.260.130. Additional clarification has been requested regarding the meaning and application of certain terms and provisions discussed in that interpretation. This interpretation supplements and should be read together with the March 30, 2026, and is not intended to modify or supersede the interpretations contained therein.

Interpretation:

1. *Interpretation of PMC 18.260.070(A) – Consistency Standard*

   PMC 18.260.070(A) states that when a PRD is proposed adjacent to an existing single-family residential zone developed utilizing traditional subdivision development standards and lot sizes of 7,500 square feet or larger, the PRD shall be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter.

   The PMC establishes "consistency" as the operative regulatory standard applicable to PRD design at the adjacent perimeter. The code does not establish separate regulatory definitions or independent tests for the terms "consistent" and "compatible" within PMC 18.260.070(A).

   The March 30, 2026, Administrative Interpretation discussed the evaluation of whether a proposed PRD satisfies the consistency requirement established by PMC 18.260.070(A) using the term "compatibility" within the context of the

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discretionary review process. The March 30 interpretation did not establish compatibility as an independent regulatory standard separate from the consistency requirement contained within PMC 18.260.070(A).

Accordingly, PMC 18.260.070(A) establishes a single design standard requiring that the PRD be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter. Evaluation of whether that standard has been met occurs through the City's development review process.

2. *Portion of the Planned Residential Development Relevant to Evaluation*

PMC 18.260.070(A) applies when a PRD is proposed adjacent to qualifying existing residential development.

As stated in the March 30, 2026, Administrative Interpretation, the phrase "adjacent perimeter" refers to the portion of the project boundary where the PRD site is adjacent to an existing subdivision or residential zone. The code does not require that every lot within the PRD be adjacent to the neighboring subdivision.

The provision further authorizes the review authority to require matching lot sizes, lot widths, house height and scale, or other provisions deemed appropriate for those lots located adjacent to the existing subdivision.

Accordingly, PMC 18.260.070(A) is evaluated with reference to the portion of the PRD where adjacency exists. As stated in the March 30, 2026, Administrative Interpretation, the provision does not require that every individual lot within the PRD be adjacent to the existing subdivision. The second sentence of PMC 18.260.070(A) authorizes the review authority to require certain design provisions for those lots located adjacent to the existing subdivision.

The applicability of those provisions is evaluated using the definitions contained within the PMC and through the City's development review process. This interpretation does not alter the definitions of "abutting" or "adjacent" contained within the PMC.

Determination of whether a proposed PRD satisfies the applicable standards is made through the City's review process based upon the full development proposal and the record established during that review.

3. *Relationship Between PMC 18.260.070(A) and PMC 18.260.070(B)*

PMC 18.260.070(B) establishes requirements for perimeter screening where a PRD abuts existing residential zones. Subsection (B) expressly states that these screening provisions apply "in addition to subsection A."

Because subsection (B) is written as an additional requirement, it does not replace, eliminate, or supersede the design consistency requirement contained in subsection (A). Instead, the provisions operate together within the PRD design framework established by Chapter 18.260.

Accordingly:

- Compliance with subsection (B) does not substitute for compliance with subsection (A);
- Screening measures required or authorized under subsection (B) do not independently satisfy the consistency requirement established by subsection (A); and
- The presence of screening features, open-space tracts, landscaping, fencing, or other buffering measures does not render subsection (A) inapplicable where the adjacency provisions of the code otherwise apply.

Each subsection establishes separate requirements, and compliance with one provision does not eliminate the applicability of another unless expressly stated in the code. This interpretation is consistent with the March 30, 2026, Administrative Interpretation, which concluded that subsection (B) establishes requirements that apply in addition to subsection (A).

4. *Interpretation of "General Characteristics"*

PMC 18.260.130 provides that applications for PRDs shall contain the submittal requirements identified in the applicable application forms. PRDs involving the creation of lots are also subject to applicable preliminary subdivision submittal requirements.

The March 30, 2026, Administrative Interpretation clarified that preliminary plans are conceptual in nature and are intended to demonstrate the proposed layout and general characteristics of development features so that their relationship to surrounding properties and site design can be evaluated during the review process.

Neither PMC 18.260.130 nor the applicable preliminary subdivision submittal requirements define the phrase "general characteristics."

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Consistent with the March 30, 2026, interpretation, preliminary subdivision plans are intended to provide sufficient information regarding the proposed location and general nature of development features to facilitate review at the preliminary stage of the approval process.

Detailed engineering design, structural calculations, construction specifications, and other technical information are typically addressed during subsequent grading permit and civil plan review.

Accordingly, the phrase "general characteristics," as applied to preliminary plans, refers to the conceptual information necessary to understand the proposed feature and evaluate its relationship to the overall site design during preliminary review. Consistent with the March 30, 2026, Administrative Interpretation, detailed engineering design, structural specifications, and construction details are typically addressed during subsequent grading permit and civil plan review.

Conclusion:

PMC 18.260.070(A) establishes a single regulatory standard requiring that a PRD be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter. The PMC does not establish separate regulatory standards for "consistency" and "compatibility" within this provision.

The consistency requirement applies to the portion of the PRD where adjacency exists and does not require that every individual lot within the PRD be adjacent to the existing subdivision.

PMC 18.260.070(B) establishes screening requirements that apply in addition to the design consistency requirement contained in subsection (A). Screening measures do not replace or substitute for compliance with subsection (A), and the presence of screening features does not eliminate the applicability of subsection (A) where adjacency otherwise exists.

PMC 18.260.130 and the applicable preliminary subdivision submittal requirements require conceptual information sufficient to evaluate proposed development features during preliminary review. Preliminary plans are intended to demonstrate the general layout and characteristics of proposed development, while detailed engineering design and construction specifications are typically addressed during subsequent permit review.

Determination of whether a proposed PRD satisfies the applicable provisions of PMC Chapter 18.260 is made through the City's discretionary development review process. Planning staff conduct the technical review of the application and provide analysis and recommendations, and the Hearing Examiner serves as the decision-making authority who evaluates the full record and determines whether the proposal satisfies the applicable provisions of the Poulsbo Municipal Code.

This administrative interpretation clarifies the meaning and application of the relevant provisions of the Poulsbo Municipal Code and does not constitute a determination regarding whether any specific development proposal satisfies those provisions.

This interpretation is intended to provide additional clarification regarding the application of the relevant provisions of the PMC and should be read in conjunction with the March 30, 2026, Administrative Interpretation. Except as expressly clarified herein, the interpretations contained within the March 30, 2026, Administrative Interpretation remain unchanged.

Authority:

PMC 18.300.020 authorizes the Planning Director to make administrative determinations and interpretations regarding the application of provisions of Title 18. Such determinations must be consistent with the spirit and intent of the Poulsbo Municipal Code and the Comprehensive Plan.

Formal interpretations issued by the Planning Director are maintained by the Planning and Economic Development Department and serve as guidance for the consistent administration of the City's development regulations.

Appeal:

The decision is final. This decision may be appealed to the Hearing Examiner within 14 days. The written appeal, appeal fee, and deposit must be received by the PED department no later than 4:30 p.m. on Monday, July 6, 2026.

Signed by:
Heather Wright
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Heather Wright, AICP, Planning and Economic Development Director — Date: 6/22/2026

March 10, 2026

Ms. Nikole Coleman
Planning Manager
Planning and Economic Development Department
City of Poulsbo
200 NE Moe Street
Poulsbo, WA 98370

Re: Pinnacle at Liberty Bay PRD – Retaining Structure Feasibility and Record Sufficiency

Dear Ms. Coleman,

We submit these comments regarding the Pinnacle at Liberty Bay Planned Residential Development and Preliminary Subdivision application currently under staff review. Our purpose is not to express opposition to that development, but to ensure that the project record contains sufficient evidence to support the findings required under the Poulsbo Municipal Code.

The retaining structures proposed near the boundaries shared by the Pinnacle development and the Crystal View subdivision appear to be integral to the grading configuration that enables the roadway slope and lot layout shown on the PRD plans. Because those structures would permanently replace natural lateral support currently provided by undisturbed soils with engineered retention systems, we respectfully request that their feasibility and constructability be demonstrated in the project record prior to advancement of the application.

Preceding the pending PRD application, the Applicant thereof sought from the City of Poulsbo feedback as to whether a smaller PRD and subdivision was feasible for development on only two of the five land parcels comprising the project site as currently proposed. Attached hereto as Attachment No. 1 is a civil plat drawing dated 10/18/2024 and titled “Johnson Feasibility Site Plan” that was submitted by the Applicant at that time (annotations added). An internal project street is shown on that drawing as running close to the property line between the project and the western edge of the existing Crystal View subdivision and ending in a cul-de-sac giving access to five project lots. The street is labeled as having a 15% grade, which exceeds the maximum 12% slope prescribed by applicable City of Poulsbo regulations. After receiving feedback and guidance from City staff the Applicant made changes and also enlarged the scope of the project, leading to the present application.

The current project plans depict an internal roadway (Road “B”) proximate to the western boundary of Crystal View and labeled as a twelve percent grade, matching the City’s maximum allowable street slope. Road “B” is shown as serving fourteen project lots. Achieving that reduced street grade and increased lot count appears to require excavation along the shared boundary and the construction of retaining structures to stabilize the resulting cut slopes. The plans further depict other retaining structures to stabilize cut slopes that are proximate to the southern boundary of Crystal View. Those retaining structures appear to facilitate space for

project lots drawn along private access streets labeled as internal tracts “Q” and “R”. Where substantial excavations are necessary to achieve regulation-compliant roadway slope and plat layout, the feasibility of the retaining structures necessitated by those excavations becomes a prerequisite foundation of the project design rather than a deferrable construction detail.

We hope that our comments can contribute to the development of a thorough and comprehensive project record concerning the retaining structures proposed near the boundaries shared by the Pinnacle project and the Crystal View subdivision and the resulting removal of natural lateral support for those Crystal View properties proximate to those structures.

Key Project Record Questions

Of the numerous questions we have concerning the retaining structures proposed near the western and southern boundaries of the Crystal View subdivision the following are of particular concern:

- Reliability of retaining structures replacing natural lateral support. No information or explanation is in the project record that supports whether the proposed engineered retaining structures that rely upon geological conditions, retaining structure type selection, engineering analysis and retaining structure design, construction, and long-term maintenance can reliably substitute for the natural lateral support presently provided by undisturbed soils.
- Constructability within site constraints. The record does not presently demonstrate that the retaining structures shown on the PRD plans can be constructed entirely within the depicted tracts and easements without requiring entry onto Crystal View properties.
- Adequacy of geotechnical documentation. Alignment-specific subsurface exploration and conceptual structural sections illustrating how the structures would resist earth pressures and abutting residential surcharge loads do not appear in the current record.

The following sections explain these questions in greater detail and identify additional considerations that may assist the City in evaluating the feasibility, constructability and long-term performance of the retaining structures depicted on the PRD plans.

I. Context of Prior Public Input

For context, comments regarding the boundary-area retaining structures previously have been submitted by Crystal View residents during the review process, including during the formal public comment period. The questions and comments presented here reflect a refinement and clarification of those earlier communications, informed by the Applicant’s responses and the evolution of the application materials now in the record.

II. PRD Approval Requires Adequate Record Support

Approval of a Planned Residential Development requires findings that the proposal complies with applicable development standards and that the record contains sufficient information to support those findings. Where a project configuration depends upon retaining structures to

enable the grading and roadway layout shown on the plans, the feasibility of those structures becomes relevant to the land-use approval decision rather than being a later construction detail.

III. Relationship Among Roadway Grading, Retaining Structures and PRD Layout

The retaining structure proposed near the Crystal View western boundary appears closely related to the grading configuration necessary to achieve the Road "B" roadway grade and the significant increase in buildable lots depicted on the plans.

Where excavation is required to achieve regulation-compliant roadway grades and to stabilize adjacent deep cuts in native soils, the feasibility of the resulting retaining structures becomes an integral component of the project layout. If the retaining structures required to stabilize those excavations cannot be accommodated within the available spaces, the roadway configuration and affected lot layouts may require revision.

IV. Constructability Within the Available Tracts and Easements

The plans depict two retaining structure conditions along the Crystal View boundaries:

- a retaining structure of approximately eight feet in height, together with fencing and landscaping, located within Tract P, near the western boundary; and

- a retaining structure of approximately twelve feet in height located within a ten-foot "wall easement" in the rear area of the proposed lots along the north side of project tracts "Q" and "R" that run near and parallel to the southern boundary of Crystal View.

The record does not appear to contain conceptual structural sections, excavation envelopes or other documentation demonstrating that these retaining structures can be constructed entirely within the depicted tracts and easements.

Also, project lots 42-49, which are drawn along private access streets in tracts "Q" and "R", are designed with depths of approximately eighty feet, leaving a space between the rear face of the houses and the rear property line of approximately ten feet, consistent with the project rear setback dimension cited in the plans. It thus appears that the 10-foot wall easement that would contain the 12-foot retaining structures would be co-existent with the 10-foot rear setback space. Poulsbo Municipal Code Section 18.260.060 (C) specifies that dwellings on lots without direct frontage on a public street should be situated to create usable private yard space for the dwellings. Restrictive conditions in the easements that support required maintenance of the retaining structures might prevent homeowners from full enjoyment of the limited space remaining, including prohibition of permanent structures such as covered patios and pools.

Comments by the City's Engineering Department during staff review indicate that construction of retaining structures in these locations may require entry onto neighboring Crystal View properties. This caution underscores the importance of demonstrating that the proposed retaining structure configuration can be constructed entirely within the Applicant's property boundaries. Approval of the PRD application cannot be conditioned upon whether or not all neighboring Crystal View property owners would consent to construction access or temporary easements.

V. Narrow Tracts and Retaining Structure System Footprint

Different retaining structure systems require different structural footprints and excavation limits. Depending on the type of system used, structural elements may extend far behind the face of or deep into the earth along the alignment of the structure and may require additional space for reinforcement, drainage zones, embedment, construction tolerances and setbacks from the property lines.

In addition, engineered retaining structures require ongoing inspection and maintenance, and in the event of damage may require repair or reconstruction. Adequate space for access for such activities becomes a perpetual requirement. For project lots shown north of tracts "Q" and "R" and south of the twelve-foot retaining structures, the available space is between the rear face of the homes and the front face of the retaining structures, a space of approximately ten feet.

Because the tracts and easements shown along and near the Crystal View western and southern boundaries appear relatively narrow, the type of retaining structure ultimately used may affect whether the configurations depicted on the plans can be implemented within the available spaces.

Receiving from the Applicant conceptual information regarding the type of retaining structure contemplated, during the staff review phase, would assist the City and the public in understanding how the proposed configuration is intended to be constructed.

VI. Localized Pinch Point Near the Road B Turnaround

The plans appear to show that Tract P narrows where the Road "B" cul-de-sac or turnaround widens eastward toward the property line. This narrowing may create a localized condition where the available space for retaining structure construction is reduced by inflexible roadway geometry. Also, because the slope of Road "B" and of the alignment of the retaining structure will be 12%, grade transitions can increase construction complexity Since Tract P is required to accommodate the retaining structure and its drainage system, the 6-foot wooden fence and landscaping, together with required irrigation, a localized narrowing of the tract in this area may represent a particularly significant constructability constraint.

This apparent pinch point reinforces the value to the review process of having the opportunity to examine conceptual structural sections and construction-envelope information demonstrating that the retaining structures depicted on the plans can be accommodated within the available spaces.

VII. Adequacy of Geotechnical Documentation

The geotechnical materials submitted with the application do not appear to include subsurface exploration points located directly along the retaining structure alignments proximate to the Crystal View western and southern boundaries.

Where substantial retaining structures are proposed to resist lateral earth pressures and residential surcharge loads, alignment-specific geotechnical information is typically necessary to evaluate soil conditions, drainage considerations and global stability.

For the Applicant to provide such information would assist the City and the public in understanding whether the proposed retaining structures are appropriate for the site conditions and feasible to be built in the locations drawn in the plans.

VIII. Timing of Structural Review

The Applicant has indicated that detailed retaining structure design may occur during later permit stages following PRD approval. Those permit reviews are typically administrative in nature and do not allow for public notice, public comment or public hearing procedures.

Where a project configuration depends upon retaining structures to stabilize excavation and enable the grading, roadway layout and lot configuration depicted on the plans, it may be helpful for the project record at the PRD stage to include sufficient conceptual information to demonstrate that those structures are physically achievable within the site constraints.

Providing that information during the PRD review stage allows City staff and the public to evaluate the feasibility of the proposed retaining structure type, construction process and tract/easement configurations before the project advances to later stages of approval.

IX. Permanent Replacement of Natural Lateral Support

The proposed excavation would remove natural lateral support currently provided by undisturbed native soils along the western and southern boundaries of the Crystal View subdivision and replace it with engineered retaining structures.

Natural lateral support reflects the existing geological condition of the site and does not depend on constructed elements or long-term maintenance. By contrast, an engineered retaining system depends upon those geologic conditions and also upon retaining structure type selection, engineering and design assumptions, construction quality, drainage performance and ongoing inspection and maintenance.

While such systems can be designed to perform safely when properly implemented and maintained, replacement of natural soil support with engineered retention necessarily and permanently changes the long-term reliability profile of the site for adjacent residences.

For this reason, it is important that the record demonstrates that the proposed retaining structures are appropriate for the site conditions and capable of performing their intended function.

X. Adjacency to an Established Residential Neighborhood

The retaining structures proposed along this boundary would be located immediately adjacent to an established residential subdivision containing existing homes and yards.

Because excavation and construction of retaining structures would occur directly adjacent to existing residences, careful documentation of feasibility, consideration of site evaluation and construction monitoring requirements and due regard for long-term performance are particularly important during the project review stage.

XI. Perpetual Maintenance Considerations

The Applicant has indicated that the retaining structures, boundary tracts, wooden screening fences, landscaping and associated improvements would be owned and maintained by the homeowners association associated with the development.

While such arrangements are common within subdivisions, the retaining structures proposed near the western and southern boundaries of Crystal View would directly affect the stability of neighboring properties outside the development, properties not members of the project HOA.

For that reason, the City may wish to consider whether perpetual inspection and maintenance obligations, recorded to run with the land, would provide impacted property owners with legally enforceable assurance that the retaining structures will continue to perform as intended.

XII. Informative Role of Precedent

The City of Poulsbo has extensive experience reviewing and approving residential developments in areas characterized by significant topographic variation. As a result, retaining structures, rockeries, and other slope stabilization measures are common features within many residential subdivisions throughout the City.

At the same time, the boundary conditions proposed along portions of the Pinnacle to Crystal View interface appear to involve a combination of features that may be less typical. These include extended retaining structures located directly near the shared boundary between developments, narrow tracts or easements containing irrigated landscaping and fencing immediately adjacent to or sharing space with those structures and the placement of such features in close proximity to the rear yard areas of the proposed Pinnacle lots and of adjacent Crystal View residences. However, it may be that similar boundary configurations have been approved in prior developments within the City. If comparable examples exist, it may be helpful for the record to identify them so that the context and design approaches used in those projects can inform the evaluation of the present proposal.

XIII. Subdivision Boundary Transition

If the proposed boundary area configurations are relatively uncommon, that circumstance may warrant careful consideration of how the proposed retaining structures, screening features and landscaping elements will function together to achieve the objectives expressed in PMC 18.260.070.

PMC 18.260.070 addresses consistency between Planned Residential Developments and adjacent conventionally developed neighborhoods. Where a PRD project proposes substantial excavations and engineered retaining structures directly near a shared boundary, it may be appropriate to consider how that condition relates to the broader intent of the code to moderate transitions between differing development patterns.

Because the City staff, the Planning Commission and the Hearing Examiner have reviewed numerous hillside residential developments over time, they may be in a position to recognize whether boundary configurations comparable to those proposed for the Pinnacle development

have been evaluated in prior projects, and whether any design practices or conditions from those projects may be instructive for assisting the Pinnacle development to achieve the consistency and compatibility objectives of PMC 18.260.070.

XIV. Requested Supplemental Information

To assist the City in evaluating how the Pinnacle project addresses the issues raised in this letter we respectfully request that the Applicant provide the following information during the ongoing staff review period and prior to advancement of the project to the Planning Commission:

1. Identification of the anticipated retaining structure system or systems.

2. Identification of construction materials for the boundary retaining structures, as required by the mandatory provisions of PMC 18.260.130 (E).

3. Conceptual structural sections that illustrate retaining structure geometry and excavation limits.

4. Documentation that demonstrates that construction can occur within the depicted tracts and easements without entry onto neighboring properties in the Crystal View subdivision.

5. Explanation of how the PRD development standards of PMC 18.260.060 (C) will be achieved for project lots 42-49, after allowing for the permanent access required for inspection, maintenance and repair of the 12-foot retaining structures at the rear of those lots.

6. Alignment-specific geotechnical information that addresses soil conditions along the retaining structure locations.

7. A technically specific explanation of how the retaining structures will resist anticipated earth pressures and residential surcharge loads from Crystal View properties.

8. Proposed language for inclusion in the Pinnacle HOA CC&Rs describing, inter alia, (i) the HOA's ownership of the retaining structures, tracts, wooden fences, perimeter landscaping, irrigation systems and related infrastructure and (ii) the HOA's governance mechanisms, inspection and maintenance duties and reserve studies and funding provisions with respect to the retaining structures and associated elements.

To be clear, we are not asking that the Pinnacle project Applicant apply today for grading permits or retaining structure building permits. However, it is reasonable to believe that work done by the Applicant with its engineering and geotechnical advisors to prepare the application may already have produced information that could address the questions raised in this letter.

If materials responsive to the listed items are submitted, we respectfully request that the public receive notice that they are available for review and that a reasonable supplemental comment period be provided for affected property owners and the public to fully evaluate the new information, which may require selection and retention of qualified experts to study and respond to such information.

Conclusion

Because the retaining structures depicted near the project boundaries shared by the proposed Pinnacle development and the Crystal View subdivision appear to be integral to the grading configuration necessary to achieve a regulation-compliant slope for project Road "B" and the lot layout shown on the PRD plans, and

Because those structures would permanently replace natural lateral support existing for Crystal View residential properties adjacent to the proposed Pinnacle development, and

Because those structures are depicted within relatively narrow tracts and easements proximate to existing homes, and

Because those structures would depend on site-specific geologic conditions,

it may be helpful for the project record to include sufficient information to demonstrate their feasibility and constructability before the application proceeds to a public record meeting before the Planning Commission.

We appreciate the work of City staff in reviewing the Pinnacle proposal and further appreciate the opportunity to submit questions and comments to contribute to that review.

Respectfully submitted,

Dana Lockhart

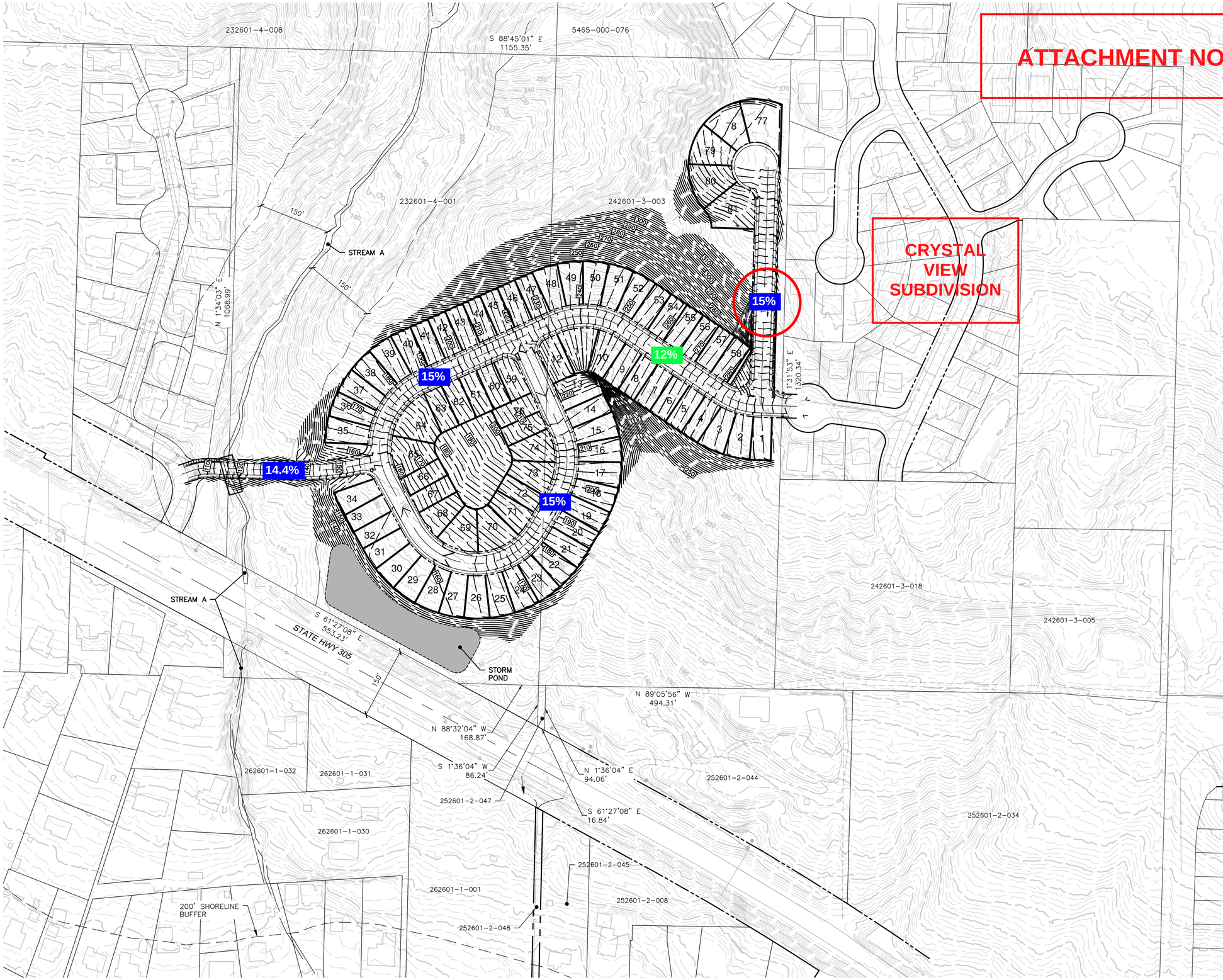
Katharine Lockhart

1780 NE Crystal View Ct., Poulsbo WA 98370

CC: Crystal View Homeowners Association

Attachments:

Attachment No. 1 - Civil plat drawing dated 10/18/2024, titled "Johnson Feasibility Site Plan"



n

SCALE: 1" = 100'

100 50 0 100 200

CONTOUR INTERVAL = 2'

ESTIMATED EARTH WORK QUANTITIES

CUT	111,800 CY
FILL	98,900 CY
NET (CUT)	12,900 CY

TOPOGRAPHICAL NOTE

EXISTING SITE FEATURES, TOPOGRAPHICAL DATA, ELEVATIONS, AND PROPERTY BOUNDARIES SHOWN ON THESE DRAWINGS HAVE BEEN PREPARED BASED ON INFORMATION FURNISHED FROM GIS. WHILE THIS INFORMATION IS BELIEVED TO BE RELIABLE, ESM CONSULTING ENGINEERS, LLC CANNOT ENSURE ACCURACY AND THUS IS NOT RESPONSIBLE FOR THE ACCURACY OF THAT INFORMATION OR FOR ANY ERRORS OR OMISSION WHICH MAY HAVE BEEN INCORPORATED INTO THESE DRAWINGS AS A RESULT. IT IS THE SOLE RESPONSIBILITY OF THE OWNER AND/OR HIRED CONTRACTORS TO VERIFY ALL INFORMATION PRIOR TO PLACEMENT OF STRUCTURES ON THE PROPERTY.

REVISIONS

NO.	DESCRIPTION/DATE	BY

ESM CONSULTING ENGINEERS LLC
33400 8th Ave S, Suite 205
Federal Way, WA 98003
FEDERAL WAY (253) 838-6113
LYNNWOOD (425) 297-9900
www.esmcivil.com
Civil Engineering | Land Surveying | Land Planning
Public Works | Project Management | Landscape Architecture

MONTEBANC MAGAGEMENT, LLC

JOHNSON FEASIBILITY

SITE PLAN

CITY OF POULSBO WASHINGTON

JOB NO.:	2090-004-022
DWG. NAME:	EN-07
DESIGNED BY:	JE
DRAWN BY:	HF
CHECKED BY:	
DATE:	10/18/2024
DATE OF PRINT:	

EN-07

1 OF 1 SHEETS

File: \\Esm8\engr\ESM-JOBS\2090\004\022\exhibits\EN-07.dwg
Plotted: 10/18/2024 11:32 AM Plotted By: Don Lapp

From:	Andrew Hitchings
To:	Nikole CH. Coleman; City of Poulsbo Planning and Economic Development
Subject:	Permit P-06-20-25-03 – Comments on Request for Revisions No. 5 & 30-Unit Density Cap
Date:	Monday, August 3, 2026 11:11:03 AM

Dear Nikole,

On behalf of the Neighborhood Coalition, thank you and the City review team for your thorough work on **Request for Revisions No. 5**. The Planning and Engineering departments' firm stance on public safety, road geometry, critical areas, and long-term infrastructure liability is deeply appreciated by our community.

Following up on our recent email regarding IFC Appendix D107, we wanted to formally highlight one crucial framing point for the administrative record:

- **Scale vs. Access Compliance (The 30-Unit Fire Code Cap):** As highlighted in Engineering's comments regarding the mandatory Baywatch (NR-12) connection, the applicant's access conflicts are the result of a design choice, not an inherent land constraint. Under **IFC Appendix D107.1**, single-access development is explicitly capped at **30 single-family units**.

- **A Buildable Alternative:** A scaled-back, 30-home plat situated below the existing Crystal View development could be built safely within existing single-access constraints without violating fire codes or forcing secondary connections through adjacent neighborhoods. The current safety and traffic bottlenecks exist only because the developer is choosing to push a 138-unit layout beyond the lawful capacity of the street network.

Thank you again for holding the line on code compliance during this 90-day review window. We look forward to reviewing the published Staff Report ahead of the public hearing.

Respectfully,

Andrew Hitchings

Lead Contact, Neighborhood Coalition of Crystal View, Baywatch, & Concerned Poulsbo Residents

Permit No. P-06-20-25-03

June 26, 2026

Ms. Nikole Coleman
Planning Manager
Planning and Economic Development Department
City of Poulsbo
200 NE Moe Street
Poulsbo, WA 98370

Subject: Pinnacle at Liberty Bay PRD — Supplemental Comments Regarding Sunrise Ridge Avenue S-Curve Corridor

Dear Ms. Coleman,

Please accept this letter as a supplemental submission regarding our June 2, 2026, memorandum addressing the proposed Sunrise Ridge Avenue S-curve corridor (attached for ease of reference).

As the public review process proceeds toward the July 7, 2026, Planning Commission meeting, we respectfully renew the questions presented in our earlier memorandum concerning the proposed operation of the Sunrise Ridge corridor. Our purpose is not to request new engineering analyses or redesign of the project. Rather, we seek clarification regarding the information that the Applicant contends presently exists within the project record and upon which the Planning Commission and, ultimately, the Hearing Examiner may rely in evaluating the proposed Sunrise Ridge corridor configuration.

The attached memorandum identified several questions regarding what appears to be the cumulative interaction of roadway geometry, roadway grade, concentrated access points, residential driveways, pedestrian activity, on-street parking, and revised project traffic patterns following elimination of the Baywatch access connection. Although these individual elements may have been addressed to a limited extent in the project record, it remains unclear whether they have been evaluated collectively as a single integrated operating condition for the Sunrise Ridge corridor.

Since submission of our June 2 memorandum, the Applicant has submitted its June 17, 2026, Response Letter addressing the City's third request for project revisions. That response confirms that issues concerning the Baywatch roadway connection, project phasing, and the proposed roadway network continue to be the subject of ongoing discussion between the Applicant and the City. In light of those continuing discussions, we respectfully believe that the clarification of the Sunrise Ridge Avenue operational questions presented in our June 2 memorandum will assist the

Planning Commission and, ultimately, the Hearing Examiner in evaluating the project upon a complete and well-developed record.

Accordingly, we respectfully request clarification regarding the following:

Question 1

Does the Applicant contend that the present project record adequately evaluates the operational characteristics of the Sunrise Ridge Avenue S-curve corridor proposed under the current project configuration?

If so, please identify the portions of the project record upon which the Applicant relies.

Question 2

Please identify where within the project record the Applicant contends that the combined interaction of roadway geometry, Road C, the shared-access streets, residential driveways, pedestrian activity, on-street parking, and other frontage-related operational features has been evaluated as a single integrated operating condition.

Question 3

Please identify where within the project record the Applicant contends that the operational implications of eliminating the Baywatch access connection have been evaluated specifically with respect to the Sunrise Ridge corridor and the Road C intersection.

Question 4

Please identify where within the project record any location-specific operational or safety evaluations may be found for (a) the Road C/Sunrise Ridge intersection, (b) the Tract M and Tract N intersections with Sunrise Ridge, and (c) the intersections of projects lots 1-4 and 51-54 with Sunrise Ridge.

Question 5

Please identify any Planned Residential Development or subdivision within the City of Poulsbo that the Applicant contends presents a roadway configuration comparable to the proposed Sunrise Ridge corridor, including S-curve and steep grade geometry, the concentration of multiple intersecting streets, shared-access streets, residential driveways, and frontage activity along the roadway segment. If the Applicant is aware of such projects, please identify them and explain how they informed the design of the present proposal.

The questions presented above are not intended to request additional traffic studies or construction-level engineering. Rather, they are intended to assist the Planning Commission and, ultimately, the Hearing Examiner in determining whether the present project record contains sufficient information to permit informed evaluation of the proposed Sunrise Ridge Avenue corridor before recommendations and findings are made under PMC 18.260.140.

Thank you for your consideration. We respectfully request that this letter, together with our June 2, 2026, memorandum, be included in the project record and provided to the Planning Commission for its consideration.

Sincerely,

Dana Lockhart

Katharine Lockhart

Attachments:

Attachment 1: Lockhart Letter dated June 2, 2026; Subject: Pinnacle at Liberty Bay PRE) — Sunrise Ridge Avenue S-Curve Corridor Review

cc: Crystal View Homeowners Association

Attachment 1

June 2, 2026

Ms. Nikole Coleman

Planning Manager

Planning and Economic Development Department

City of Poulsbo

200 NE Moe Street

Poulsbo, WA 98370

Subject: Pinnacle at Liberty Bay PRD – Sunrise Ridge Avenue S-Curve Corridor Review

References:

(1) Crystal View Plat Mod – Offsite Maintenance Road, dated 02/01/2016 (see Attachment 1)

(2) Traffic Impact Analysis – Heath & Associates – Version 3 – April 2026 (the "Traffic Impact Analysis")

Dear Ms. Coleman,

We submit the following comments regarding the proposed Pinnacle at Liberty Bay PRD and, in particular, the proposed completion and activation of the currently closed Sunrise Ridge Avenue S-curve segment in connection with Phase 1 of the Pinnacle project.

Our purpose is not to oppose development for its own sake. Rather, we request clarification regarding whether the present project record reflects that the operational and safety implications of the proposed Sunrise Ridge corridor configuration have been fully evaluated before the project application proceeds to the next stages of the City's review process.

A. The Sunrise Ridge S-Curve Represents a Unique Review Opportunity

The Sunrise Ridge S-curve corridor extends from the southern boundary of the Crystal View subdivision, close to the Crystalia Court cul-de-sac, to the point where Sunrise Ridge meets Johnson Parkway at the compact roundabout opposite the entrance to the Liberty Bay Vista subdivision.

An important aspect of the present review is that the Sunrise Ridge S-curve segment is not presently functioning as an active public roadway. The segment remains gated, incomplete, and unavailable for through traffic.

Accordingly, the City is not merely evaluating impacts to an established operating condition. Rather, the current review process represents a meaningful opportunity to evaluate the future function of the corridor before continuous public traffic is introduced and before permanent development patterns become established.

B. Evolution of the Corridor's Intended Function

The Sunrise Ridge S-curve segment was constructed during the development of the Crystal View subdivision. As shown in the Crystal View Plat Mod drawing from 2016, (see Attachment 1) the S-curve is described as "Offsite Maintenance Road". The road segment appears originally to have been conceived primarily as a construction/service access route, a terrain-transition roadway, and a future connector segment.

However, the cumulative effects of subsequent development proposals appear to have materially changed the operational expectations associated with the corridor. The Audrey Estates proposal was approved in 2024. The current Pinnacle project layout proposes that Road C, two shared-access streets (Tracts M and N), eight residential frontage driveways, on-street parking, and pedestrian-oriented recreation areas be introduced into the corridor. The Pinnacle and Audrey Estates developments collectively appear to place substantially different operational demands upon the corridor than those originally contemplated.

The corridor now appears intended to function simultaneously as:

- a neighborhood connector;
- a primary access route for two substantial subdivisions;
- a residential frontage street;
- a pedestrian-oriented environment; and
- a route likely to attract traffic seeking access toward Johnson Parkway and SR-305.

Clarification is therefore requested regarding whether the corridor has been reevaluated in light of these materially expanded and overlapping functions.

C. Revised Access Patterns Following Elimination of the Baywatch Connection

The applicant's revised project configuration eliminated the previously proposed Baywatch access connection, leaving all remaining project access concentrated onto the Sunrise Ridge corridor.

As a result, project traffic would be fully dependent upon the Sunrise Ridge system, accessed primarily through the Road C and the Crystalia Court points. From the project phasing plan and plat drawings it appears that Road C would be the primary access point for the subdivision and therefore would carry the larger share of project traffic.

This revision appears significant because it consolidates project access onto the same corridor segment that contains the S-curve geometry and the highest density of proposed access activity.

Clarification is requested regarding whether the operational implications of this revised circulation structure were evaluated specifically with respect to the Sunrise Ridge corridor and the Road C intersection.

D. Existing Geometric Constraints

The Sunrise Ridge S-curve segment appears to combine several potentially challenging characteristics, including combined horizontal and vertical alignments, a short tangent section, and grades at or exceeding 12 percent, all as shown on the Attachment (1) drawing.

In addition to the proposed Pinnacle access points, the segment is also intersected by the Audrey Estates sole entrance and the existing private street (Maple Hill Ave. NE) near the lower portion of the segment.

The Pinnacle proposal would introduce additional operational activity into this already constrained geometry.

E. Pinnacle Proposed Frontage and Access Configuration

The proposed Pinnacle configuration appears to introduce multiple access and operational elements into the Sunrise Ridge corridor, including:

- the Road C intersection;
- shared-access streets (Tracts M and N);
- eight direct residential driveways;
- on-street parking;
- pedestrian-oriented recreation areas;
- street trees and landscaping features; and
- routine residential and service-related vehicle activity.

The concern is not necessarily any single feature viewed in isolation. Rather, the concern is whether the combined effect of these overlapping conditions has been evaluated as a single integrated roadway environment.

F. Apparent Gaps in the Current Analytical Record

The Traffic Impact Analysis appears to focus primarily upon regional traffic operations, major intersections, and overall circulation effects.

The Traffic Impact Analysis contains substantial discussion of level-of-service conditions and intersection operations. However, it is not apparent from the Traffic Impact Analysis or other materials presently available to the public that the cumulative effects of the Sunrise Ridge corridor configuration have been evaluated, including the interaction of:

- the S-curve geometry;
- concentrated access points;
- pedestrian activity;
- on-street parking;
- driveway activity;
- service/delivery vehicle activity; and
- revised traffic concentration following elimination of the Baywatch access.

Of particular interest is the Road C/Sunrise Ridge intersection.

The applicant's most recent phasing plan shows Road C serving Phase 1 development while the Traffic Impact Analysis consolidates project-generated traffic at the Crystalia Court access point for purposes of operational analysis. As a result, it is not apparent from the current record whether the Road C/Sunrise Ridge intersection was evaluated as a distinct operational and safety condition during Phase 1 development or at project buildout.

We recognize that level-of-service analysis evaluates delay and capacity. However, delay and capacity analyses do not necessarily address broader questions of corridor safety, access concentration, driver expectancy, visibility, and conflict-point density.

G. City Standards, Policy Context, and Precedent

The City's adopted transportation standards, Comprehensive Plan policies, and development regulations collectively appear to contemplate consideration of roadway functionality, safety, sight distance, and public welfare in addition to simple dimensional compliance.

We would therefore appreciate clarification regarding whether the Department has previously reviewed or approved residential developments within the City of Poulsbo where multiple streets, shared-access tracts, and residential driveways were concentrated along a curved and graded roadway segment comparable to the Sunrise Ridge S-curve. Identification of any such projects would help the public better understand the standards and precedent being applied in the present review.

H. Requested Clarifications

To summarize, clarification is respectfully requested regarding the following:

1. What is the present functional classification of Sunrise Ridge Avenue and whether changes to that classification might be required due to the effects of the proposed

development elements on the Sunrise Ridge S-curve corridor, the elimination of the Baywatch access point and the attraction of traffic from the Noll Road corridor?

2. Whether, following elimination of the Baywatch access point, the operational implications of altered project traffic flows were evaluated specifically with respect to the Road C intersection and the Sunrise Ridge S-curve corridor?

3. Whether location-specific sight-distance analysis has been performed for Road C, shared-access streets (Tracts M and N), frontage driveways (Lots 1-4 and 51-54) or the S-curve segment generally?

4. Whether the Road C/Sunrise Ridge intersection was separately evaluated as a study intersection and, if so, where that analysis may be found in the project record, particularly as that intersection appears to function as the principal subdivision access?

5. Whether the City evaluated the combined effects of roadway geometry, access density, parking, pedestrian activity, driveway activity, and stopped vehicles as a single integrated operating condition for the Sunrise Ridge S-curve corridor?

6. Whether the corridor's likely long-term connector function and route-attraction characteristics (including "redistribution of travel demand") have been considered in evaluating the proposed frontage and access configuration?

I. Conclusion

The Sunrise Ridge S-curve corridor appears likely to become one of the most operationally complex portions of the proposed Pinnacle project. Because the roadway is presently gated and incomplete, the current review process provides a valuable opportunity to evaluate these conditions before they become permanent.

We respectfully request clarification regarding the issues identified above so that the public may better understand the basis for any findings concerning transportation safety, roadway functionality, and overall corridor operations.

Thank you for your consideration.

Sincerely,

Dana Lockhart

Katharine Lockhart

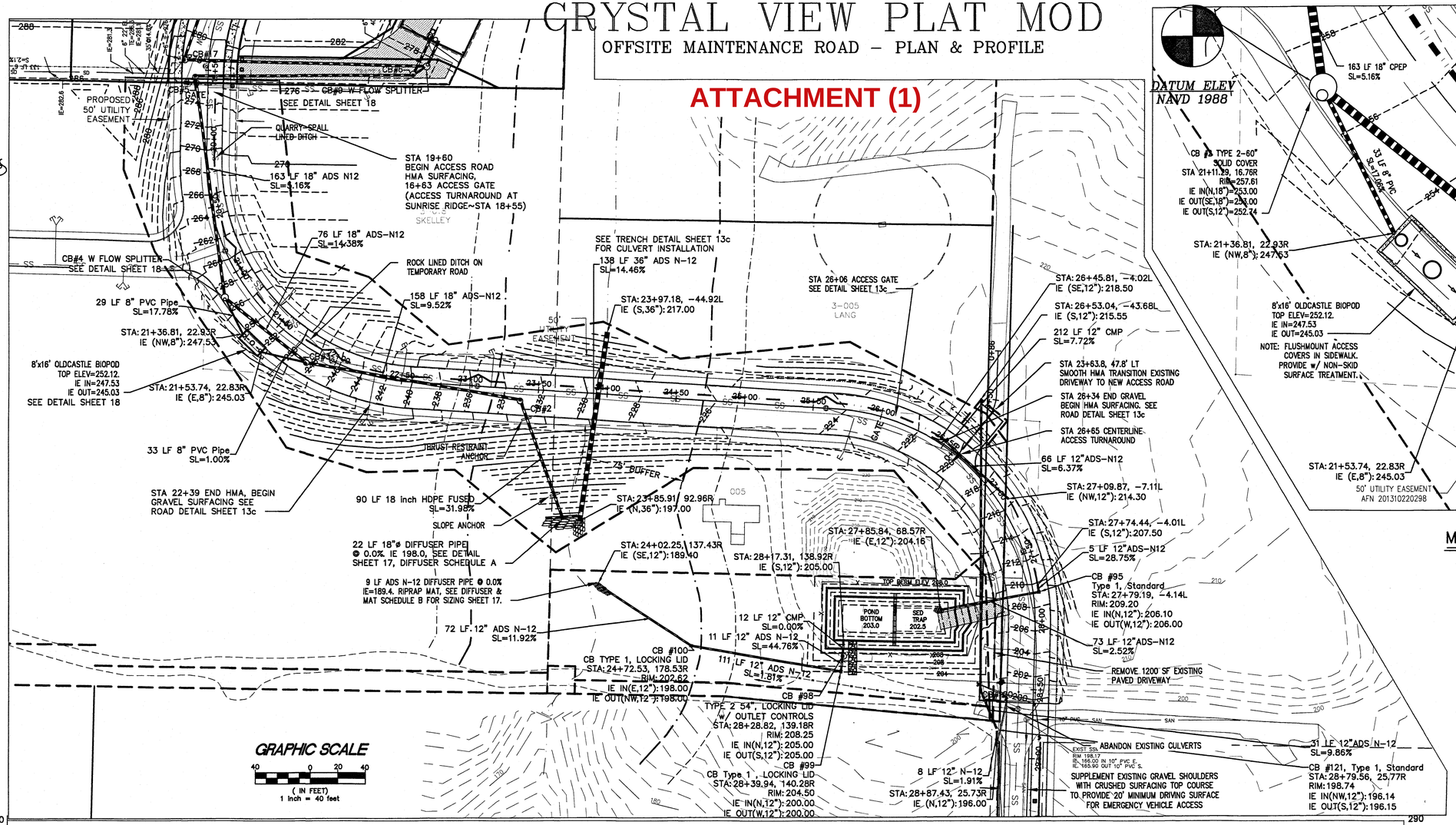
Attachments: (1) Crystal View Plat Mod – Offsite Maintenance Road, dated 02/01/2016

cc: Crystal View Homeowners Association

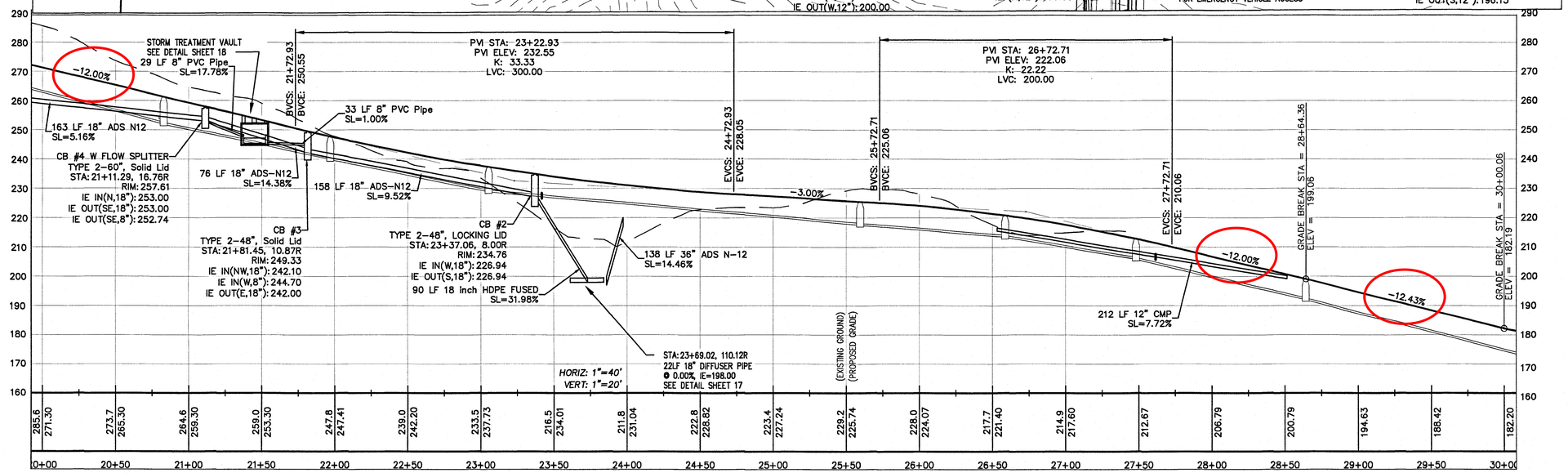
CRYSTAL VIEW PLAT MOD

OFFSITE MAINTENANCE ROAD – PLAN & PROFILE

ATTACHMENT (1)



DETAIL
MWS UNIT PLACEMENT
1"=10'



REV NO	REVISION DESCRIPTION	DATE	BY
1	FEB 24, 2016 CITY COMMENT MODS	16.03.31	JAB
2	MAY 10, 2016 CITY COMMENT MODS #2	16.05.25	JAB
3	JUNE 22, 2016 CITY COMMENTS	16.07.20	JAB
4	MINOR PLAT MODS	18.06.09	JAB
5	CITY COMMENTS TO PLAT MODS	18.11.06	JAB

DESIGN MAK
DRAWN JAB
CHECKED MAK
SEC 24 T 26N R 1E
DISC NO ____ DATE 2/01/16
SCALE 1" = 40'

DATE SEALED 11/17/18

TITLE CRYSTAL VIEW PLAT MOD
OFFSITE MAINTENANCE ROAD – PLAN & PROFILE

CLIENT CRYSTAL VIEW POULSBO LLC
% BARRY MARGOLESE
105 S MAIN STREET, STE 230
SEATTLE, WA 98104
206-910-2728

SIGNATURES

PROJECT MANAGER JEFF A. BROWN

TEAM 4 ENGINEERING
5819 NE MINDER RD
POULSBO, WA 98370
(360) 297-5560
(360) 297-7951 (FAX)

SHEET 13 OF 38

FILE NO 173B

Re: Retaining Walls

From: Michael Bateman (mbateman@cityofpoulsbo.com)

To: djlockhart@verizon.net

Date: Tuesday, December 2, 2025 at 11:01 AM PST

Hi Dana -

You're welcome!

Our building official did a great job of digging into building codes and found some stuff we did not know was there. This should help quite a bit:

Cheers!

Michael Bateman, PE
City of Poulsbo Engineering Department
200 NE Moe St, Poulsbo, WA 98370
Ph: 360-394-9744 Fax: 360-697-8269

> Hey Michael,
>
> After our talk yesterday I took a peek through the IBC. Chapter 33 covers what was discussed pretty well, I think.
>
> Here is a breakdown of the applicable code requirements from IBC Section 3307: Protection of Adjoining Property, which governs excavation, retaining walls, and construction activities near neighboring property.
>
> IBC 3307.1 — Protection Required
>
> Adjoining public and private property must be protected from damage during construction, remodeling, or demolition activities.
>
> This protection extends to:
>
> - Footings
> - Foundations
> - Party walls
> - Chimneys
> - Skylights and roofs
> - Any portion of a building or site that may be affected
>
> Builders should also put in place measures to prevent:
>
> - Water run-off
> - Erosion

- Soils Loss or Undermining

If an excavation is planned, the person performing the work must notify adjacent property owners in writing at least 10 days before the excavation begins. The notice must state:

- That excavation is to take place
- That the adjacent buildings/property be protected.

You are legally required to protect neighboring properties from damage, and you must notify the neighbor before doing any excavation that could affect their land or structures. If your work could cause soil movement, undermining, or structural impact, protection methods must be put in place.

IBC 3307.2 — Excavation Retention Systems

This section applies when the excavation may affect adjacent structures.

3307.2 — General Requirement

If an excavation retention system is needed to support soil near a property line or to protect adjacent structures, the system must meet the requirements of 3307.2.1–3307.2.3.

3307.2.1 — Retention System Design

Retention systems must be designed by a registered design professional (i.e., a licensed engineer).

The design must ensure vertical and lateral support of the soil and prevent movement that could damage adjacent property.

If the excavation is deep enough or close enough to the property line to risk soil movement, an engineer must design a shoring or support system.

3307.2.2 — Retention System Monitoring

The monitoring requirements within the design of the engineer should be laid out to track:

- Horizontal shift
- Vertical movement

This monitoring applies to both:

- The retention system itself
- Adjacent structures

You must monitor the excavation and nearby structures to ensure no shifting or settlement is occurring.

3307.2.3 — Removal of Retention System

A retention system may be removed only when:

- Adequate backfill has been placed, or
- The new structure provides equal or better support.

The removal shall be carried out in a manner so as not to endanger the adjoining property.

You cannot remove temporary shoring until the soil or new structure can safely support the loads. Removal must be done carefully to prevent soil collapse or damage to the neighbor.

This section of code will ensure that:

- Excavation does not endanger the neighboring property
- Where necessary, retaining walls and soil cuts are engineered.
- Adjacent owners are informed prior to commencing the work.
- Construction work near property lines is carried out in a way that eliminates any risk to the adjoining structures and land.

Any construction near the property line that may affect the neighbor's soil, stability, or structures must be engineered, monitored, and performed with protective measures.

Allan Chappell

Deputy Building Official

City of Poulsbo | 200 NE Moe Street | Poulsbo WA, 98370

(360) 394-9733 | achappell@cityofpoulsbo.com

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From: Dana Lockhart <djlockhart@verizon.net>
Sent: Monday, December 1, 2025 2:33 PM
To: Michael Bateman <mbateman@cityofpoulsbo.com>
Subject: Re: Retaining Walls

Hi Mr. Bateman,

Thank you for your reply. You have helped me narrow down the possible forms that the proposed Pinnacle retaining walls might take. I have continued my online research into the subject of MSE retaining walls. There is a lot of info out there, which makes it difficult to focus only on the relevant and to ignore all the “TMI” rest.

I appreciate that you have made internal inquiries about any setback requirements for retaining walls. I would welcome any further guidance you might receive back.

The 90-day period for the Pinnacle applicant to respond to the public’s comments and the City’s question list comes to an end next week. I am looking forward to seeing how the applicant responds to the retaining wall issues that I raised in my submitted written comments.

Thank you again for the time you spent with me during my visit to your department and for your further research and comments by email.

Best regards,

Dana Lockhart

Sent from my iPhone

On Dec 1, 2025, at 1:04 PM, Michael Bateman <mbateman@cityofpoulsbo.com> wrote:

Hi Dana -

What we typically see builders doing is walls similar to the first and third pictures on that page. You can walk around your neighborhood and see several examples of similar walls, some done better than others.

I'm not aware of specific codes relative to exactly how close you can work to the property line. That does get into a grey area. Obviously, they can't trespass on your property to excavate. They aren't allowed to damage your property either, but it's a grey area as to what damage means. I've asked our building official for any references to what the building code may say about that and will forward anything I do get.

If at some point if there's a dispute where property owners don't agree and engage property attorneys to debate the finer points we would put the building permit for the wall on hold to await resolution.

Michael Bateman, PE
City of Poulsbo Engineering Department
200 NE Moe St, Poulsbo, WA 98370
Ph: 360-394-9744 Fax: 360-697-8269

From: djlockhart@verizon.net <djlockhart@verizon.net>
Sent: Thursday, November 20, 2025 12:29 AM
To: Michael Bateman <mbateman@cityofpoulsbo.com>
Subject: Retaining Walls

Dear Mr. Bateman,

Thank you for the time you spent with me this afternoon. You helped me a great deal to understand many of the technical aspects of retaining walls and particularly issues surrounding the retaining walls proposed by the applicant for the Pinnacle at Liberty Bay PRD. I also appreciated your explanation of the processes and priorities that the City's planning and engineering departments apply to development applications. I am now better armed to provide comments and to raise concerns during the further steps as the Pinnacle application moves through the approval process.

Based on your description of the reinforced earth retaining wall approach I undertook some Internet research to gather more information and particularly illustrative drawings. I found the attached WSDOT document on the subject. At page 20 of 28 the three drawings appeared to portray the type of wall you described. Of the three drawings, could you offer a guess as to which one would best represent the style of wall you believe might be proposed by the Pinnacle project? I recognize that the WSDOT document is aimed at retaining walls in the context of highway/road construction, but my assumption is that the basic techniques might also work for residential construction projects.

I did have one follow-up clarifying question to make certain I did not misunderstand our discussion. Are there any PMC or Washington state regulatory requirements that specify or imply a setback distance from a property line where a property owner is not permitted to excavate (whether for a retaining wall or otherwise)?

Thank you and best regards,

Dana Lockhart