**EXHIBIT 14.b:** Lockhart Administrative Determination 2 (P-06-01-26-01)

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# PLANNING AND ECONOMIC DEVELOPMENT

## Administrative Interpretation

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**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

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**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