



September 16, 2026

Job No. 2090-004-022

Ms. Nikole Coleman, AICP
Planning Manager
City of Poulsbo
200 NE Moe St
Poulsbo, WA 98370

**RE: Pinnacle at Liberty Bay - Request for Revisions #5
P-06-20-25-03 - Comment Response Letter #5**

Dear Ms. Coleman:

ESM Consulting Engineers, LLC, is submitting the following responses to the Request for Revisions #5 Memo, that was received from you dated July 30, 2026. In an effort to provide concise and direct responses, we have copied the review comments below in *italics* and our responses are in **bold**.

Planning and Economic Development Department

1. *Plan Coordination. Revise the Preliminary Plat, Civil Plans, Landscape and Open Space Plan, Tree Protection Plan, Architectural Exhibit, Critical Areas documents, and all supporting narratives to ensure consistency throughout the application materials. All plans and supporting documents shall accurately reflect the final roadway configuration, lot layout, grading, retaining walls, tract boundaries, open space, and project statistics. All revisions shall be clearly identified in the project documents.*

RESPONSE: The plans, reports, and supporting narratives have been updated for consistency with this resubmittal; responses below describe as appropriate specific revisions made to the plat sheets and associated project documents.

2. *Revised Geotechnical Report. Submit a revised geotechnical report prepared by the project geotechnical engineer evaluating the revised site design and confirming that the proposed grading, retaining walls, roadway improvements, stormwater facilities, and associated infrastructure remain consistent with the geotechnical recommendations. The report shall specifically address revised slope stability analyses, retaining wall design assumptions, foundation recommendations, groundwater conditions, construction sequencing, and any changes resulting from the revised plans.*

Upon receipt, the revised geotechnical report may be forwarded to the City's independent geotechnical peer reviewer. Additional revisions to the report or project plans may be required based on the results of that peer review prior to staff completing its recommendation.

RESPONSE: See Geotechnical Addendum dated 9/8/26 from Aspect Consulting as a part of this application resubmittal.

3. *Retaining Wall Design and Long-Term Maintenance. The revised plans propose an extensive system of retaining walls, both internal and external to the subdivision, including numerous walls of substantial height. While the applicant has indicated that detailed structural engineering will be completed during grading permit review, the City cannot adequately evaluate or recommend approval of the Preliminary Subdivision without sufficient information to understand the impacts of these walls on the development. Because the retaining walls are integral to the proposed subdivision design, their location, scale, and long-term maintenance obligations are necessary for staff to evaluate compliance with the Preliminary Subdivision approval criteria and Planned Residential Development objectives.*

The retaining walls represent a significant permanent feature of the subdivision and create substantial long-term ownership and maintenance obligations for individual property owners and the future HOA. Prior to completion of the City's review, revise the plans and supporting documentation to clearly identify:

- *The general construction type of all retaining walls;*
- *Ownership and long-term maintenance responsibility for each wall;*
- *Required access easements for inspection, maintenance, repair and replacement*
- *The relationship between retaining walls and adjacent lots, roadways, sidewalks, utilities, open space and critical areas; and*
- *Proposed architectural treatment and landscape screening of exposed wall faces.*

In addition, staff notes that PMC 18.130.080 (Fencing and Retaining Wall Standards) limits retaining walls located within required setbacks to a maximum height of six feet.

RESPONSE: A separate Retaining Wall and Landscape Letter with supporting exhibit has been prepared and included with the submittal to address the listed concerns above and provide more detail about the proposed retaining walls and landscaping.

4. *Landscape Coordination with Retaining Walls and Utilities. Revise the Landscape and Open Space Plan to demonstrate that proposed landscaping, including street trees, shrubs, and other plantings, can be accommodated without conflicting with retaining walls, retaining wall foundations, utility easements, stormwater facilities, required maintenance access, or underground utility infrastructure. Revise plant*

locations or species, as necessary, to eliminate conflicts and ensure adequate soil volume and long-term plant viability.

RESPONSE: A separate Retaining Wall and Landscape Letter with supporting exhibit has been prepared and included with the submittal to provide more detail about how plantings can be accommodated without conflicting retaining walls, retaining wall foundations, utility easements, stormwater facilities, required maintenance access, or underground utility infrastructure. The letter also confirms adequate soil volume and long-term plant viability.

5. *Landscape Treatment of Retaining Walls. Revise the Landscape and Open Space Plan to provide landscape treatment adjacent to retaining walls, where feasible, to soften the visual appearance of exposed wall faces while maintaining required structural setbacks, utility clearances, and maintenance access. Demonstrate that proposed vegetation is compatible with the retaining wall design and long-term maintenance requirements.*

RESPONSE: A separate Retaining Wall and Landscape Letter with supporting exhibit has been prepared and included with the submittal to provide more detail about landscape treatment to adjacent retaining walls. The supporting exhibit enhances visual appearance of exposed wall faces while maintaining required structural setbacks, utility clearances, and maintenance access. It also demonstrates proposed vegetation is compatible with the retaining wall design and long-term maintenance requirements.

6. *On-Street Parking Adjacent to Retaining Walls. Several proposed on-street parking spaces appear to be located immediately adjacent to retaining walls. Revise the civil and landscape plans to demonstrate that retaining wall placement provide adequate maneuvering space between public parking spaces and the retaining wall. If necessary, revise the retaining wall alignment or parking configuration to ensure that all public parking spaces remain functional and accessible.*

RESPONSE: A separate Retaining Wall and Landscape Letter with supporting exhibit has been prepared and included with the submittal to provide more detail regarding on street parking adjacent to the proposed retaining walls and adequate maneuvering space between public parking spaces and the retaining wall.

7. *Tract F Ownership and Maintenance. Revise to divide proposed Tract F into separate tracts reflecting distinct ownership and maintenance responsibilities. The tract containing the public stormwater facility shall be dedicated to and maintained by the City. The tract containing recreation amenities, landscaping, open space improvements, and other private facilities shall be owned and maintained by the HOA. Revise all associated plans, tract tables, maintenance notes, and ownership information to reflect the revised tract configuration.*

RESPONSE: The two detention pond tracts have been further divided, placing the pond areas into tracts to be dedicated to the City. This will clearly indicate ownership and maintenance responsibility. This includes clarity on wall responsibility as the proposed public stormwater tract does not include proposed walls.

The larger of the two ponds, located in Tract E, includes a maintenance access road that will double as an open space walking trail. After further discussion with the City Engineer, it is acceptable to include an easement over the access road granted to the HOA for use of the access road as open space. There are several past projects within the city that have been set up this way. See sheet PP-07 for table ownership and figures for more information in the revised plan set.

8. *Wetland A Buffer Clarification. The revised plans appear to depict a retaining wall within Tract C adjacent to Road C that may extend into the Wetland A buffer, including the approved 515-square-foot buffer averaging area. Please clarify whether the retaining wall, associated footing, reinforcement, grading, or construction disturbance extends into the approved wetland buffer or averaging area. If so, revise the plans or submit updated critical area documentation demonstrating that the proposal remains consistent with the approved Critical Areas Report, buffer averaging analysis, and mitigation measures. Any modification to the approved wetland buffer or mitigation area shall require Planning review and approval.*

RESPONSE: All retaining walls around Wetland A have been removed. There is no grading proposed within the proposed wetland buffer including the buffer 'give' areas.

9. *Grading Within Mitigated Wetland Buffer Areas. The grading plans appear to depict grading and land disturbance within previously mitigated wetland buffer areas at several locations throughout the project site. Please identify all areas where grading, clearing, utility installation, retaining wall construction, temporary construction disturbance, or other site improvements are proposed within existing mitigation areas or restored wetland buffers.*

Provide additional information describing the extent of these impacts and demonstrate how disturbed mitigation areas will be protected, restored, or otherwise mitigated. If impacts extend beyond those previously evaluated in the approved Critical Areas Report, Habitat Management Plan, or mitigation plans, submit revised critical area documentation prepared by the project wetland consultant evaluating the proposed impacts and identifying any additional mitigation, restoration, monitoring, or maintenance necessary to ensure continued compliance with the City's critical areas regulations.

Staff must be able to determine that the revised grading plan will not compromise the function or long-term success of previously established mitigation areas before completing its review of the Preliminary Subdivision.

RESPONSE: Sheet PP-06, the Buffer Mitigation Plan sheet has been revised with this submittal No grading or land disturbance is proposed within the additional buffer areas.

Proposed contours have been added to the sheet to indicate proposed grading. Grading that may have been in the wetland 'give' areas in past submittals has now been removed.

Walls continue to be shown on PP-06 to show their relation to the wetland and stream building setbacks. Proposed walls remain outside of this building setback.

Temporary construction disturbances are noted in the blue hatching on sheet PP-06 and further discussed in Addendum 3 to the Critical Areas Report included with this submittal, which also updates the previously approved buffer averaging analysis to reflect all revisions shown.

Planning and Economic Development Department Review

Site Plan

1. *Per City of Poulsbo Construction Standards Appendix B, Section "Other", Note #6, A ten-foot easement fronting all lots shall be dedicated for public utilities. To provide continuous connection of the utilities, the utility easement shall extend along Sunrise Ridge and across Tract D. A dry utility easement will also be required along Road C adjacent to Wetland A unless the City approves its elimination. The applicant's response letter dated 7/21 indicates that dry utilities will be installed in the ROW along Tract Y to accommodate retaining walls. This approach is not acceptable by the Public Works Director, or City Engineer.*

RESPONSE: After discussions with the City Engineer a 10-foot utility easement is proposed on the south side of Sunrise Ridge Ave within Tract D, the Stream D critical areas Tract. It is formally requested that the easement be only required on one side through this area to minimize impact to the stream buffer.

This easement will provide dry utility access if needed to service the future residences. However, it is additionally expected that this section of easement may not be necessary, and dry utilities may be available from the Plat of Crystal View to the north, and from Johnson Rd NE/Johnson Pkwy NE to the south.

In any case, the proposed 10-foot easement across Tract D along Sunrise Ridge will at a minimum provide the necessary space for utilities.

Buffer impacts associated with these required utility easements are addressed in Addendum 3 to the Critical Areas Report included with this submittal.

2. *The applicant's most recent response states that adequate intersection sight distance at Sunrise Ridge cannot be achieved due to the proposed placement of homes on Lots 1 through 4. This is not an acceptable design approach. Where sight distance deficiencies result solely from proposed development design, the development shall be revised accordingly. Construction on these lots will be restricted as necessary to provide the required intersection sight distance. See related comment below regarding feasibility of access to parcel 252601-2-034-2002.*

RESPONSE: The feasibility letter evaluating this access to the Divoky property has been revised to clarify that the basis for infeasibility is not related to placement of homes on Lots 1 through 4, rather the access is infeasible because the required intersection spacing cannot be met. Additionally, if the connection were located at the Audrey Estates intersection, the roadway geometry would create safety concerns because drivers would not have adequate visibility or expectation of oncoming traffic. The proposed intersection alignment has been skewed to the maximum extent allowed by City roadway standards. See Divoky Property Feasibility Letter and supporting Exhibit included with this submittal.

Transportation:

3. *As of the writing of this memo, the city has not received sufficient information to determine if the required Baywatch connection is infeasible. As described in the Engineering Connectivity and Access Memorandum (June 15, 2026), construction of NR-12 providing a public street connection to the Baywatch subdivision shall be required.*

RESPONSE: Applicant respectfully disagrees that the previously submitted information is inadequate to make this determination; however, additional analysis documenting that the Baywatch connection is not feasible to construct is included with this submittal. See Stream Crossing Letter and supporting exhibit. The Applicant does not believe that the Baywatch connection can or should be legally required to comply with City codes and standards and therefore the plans have not been revised to show this connection. The Applicant expects this issue to be resolved at the hearing.

4. *The current site plan does not demonstrate how access to adjacent properties will be preserved. Plans shall provide future roadway connections to Tax Parcels 252601-2-034-2002 and 252601-2-044-2000, consistent with PMC 17.80.060(B). Although the applicant submitted a memorandum asserting that connections to the southern parcels are infeasible, the City has not been provided sufficient information to support that conclusion. In fact, the applicant has demonstrated the engineering feasibility of the connection to Parcel 252601-2-034-2002, but has elected not to provide the connection due to proposed home placement. This is a design choice and does not establish infeasibility.*

RESPONSE: Parcel 252601-2-044-2000 (Skelley). Access to the Skelley parcel was discussed with the City Engineer following receipt of the review comments. The City requested the feasibility letter has been updated to evaluate the potential elevation of a connecting roadway at the project's southern property line where it would meet the Skelley property. The analysis was completed using applicable City roadway standards. The most likely connection scenarios were evaluated, and both options would require a roadway approximately 35 feet above existing grade at the property line. See Skelley Feasibility Letter and supporting exhibit included with this submittal.

Parcel 252601-2-034-2002 (Divoky). The Divoky access feasibility was also discussed with the City the City Engineer. The updated feasibility memorandum provides additional clarification regarding the access constraints, including inadequate intersection spacing and infeasible sight triangles due to the curvature of the roadway. See Divoky Feasibility Letter and supporting exhibit included with this submittal.

5. *While the revised roadway profiles now include crest and sag curves, Roads B, C, D, and the proposed improvements to Sunrise Ridge continue to fall short of the City's design standards, including the April 29, 2014 Policy Memorandum (Clarification - Vertical Curve Criteria) and the minimum AASHTO K-values for a 25 mph design speed.*
 - a. *It appears the applicant is attempting to mitigate substandard K-values by proposing a stop-controlled intersection at Road B [meant to read Road D]. Because these deficiencies result from the proposed roadway design on undeveloped property, this approach is not acceptable to either the City Engineer or the Public Works Director. As previously directed, the roadway design shall be revised to meet applicable standards. Likewise, proposing a design speed below the required 25 mph minimum is not an acceptable alternative.*

RESPONSE: K-Values across the site were reviewed in person with the City Engineer following receipt of this comment. At the meeting ESM clarified that the stop-controlled intersection was not related to K-values, but had to do with entering site distance issues from Road D onto Road A/C.

It is understood that stop controls on Road A/C are not desired. This resulted in a redesign of the intersection to ensure adequate entering sight distance allowing for the stop bars on Road A/C to be removed.

6. *The proposed stop-controlled intersection at Road B [meant to read Road D] does not resolve the underlying vertical curve deficiencies and is not an acceptable substitute for compliance with the City's roadway design standards. The roadway geometry shall be revised to meet applicable design criteria. Similarly, as noted*

above, this approach would not be acceptable to the City Engineer or Public Works Director.

RESPONSE: Refer to the Comment #5 response above.

7. *The grading profile information for Road C still does not demonstrate that the proposed intersection is capable of meeting applicable ADA requirements. The Crosswalk across road C at Sunrise Ridge exceeds ADA running slope of 5% (pro汪 R302. 4.3). This requirement cannot be conditioned.*

RESPONSE: ADA running slopes have been revised to be less than 5%. Slope labels have been added to sheet PP-31 for clarity. Slope labels of the cross slope can additionally be found on the profile sheets, PP-22 to PP-25 with this resubmittal.

Stormwater

8. *The proposed retaining wall adjacent to the stormwater pond and Lots 1 through 4 is shown within future City-owned Tract F. Depending on the wall design, mechanically stabilized earth (MSE) reinforcement may extend beneath privately owned lots.*
 - a. *The City will not accept ownership or long-term maintenance responsibility for retaining walls supporting private development. The plans shall be revised so that retaining walls associated with private development remain under private ownership and maintenance.*

RESPONSE: Refer to Planning Comment #7 for response.

- b. *Although the applicant's previous response proposed retaining Tract F under HOA ownership with a maintenance easement for the stormwater facility, ownership of all required stormwater tracts must ultimately be transferred to the City.*

RESPONSE: Refer to Planning Comment #7 for response.

Geotech

9. *The latest site plan proposes retaining walls up to **35 feet** in height south of Lots 5 through 21, an increase from the 20-foot walls shown in previous submittals. The Geotechnical Report Addendum dated June 17, 2026, only evaluates retaining walls up to 20 feet in height.*

The applicant shall either revise the Geotechnical Report to support the proposed 35-foot retaining walls or revise the site plan to conform to the limitations of the existing geotechnical recommendations.

RESPONSE: Wall heights have been reduced to less than 20 feet high with this resubmittal.

Traffic

10. *The updated Traffic Impact Analysis and Peer Review Response dated July 21, 2026 has been forwarded to our peer review team for their continued comment. Any outstanding comments from our peer review team will be forwarded to the applicant upon receipt.*

RESPONSE: The Applicant only received the City's peer review comments from Parametrix on September 3, 2026. Response to additional Parametrix comments will be provided under separate cover from this resubmittal to avoid further delay in review.

If there are any questions or a need for further clarification, please feel free to contact me at (253) 838-6113 and we would be happy to discuss them with you.

Sincerely,

ESM CONSULTING ENGINEERS, LLC



ROBBY OVERFIELD
Project Manager

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