From:	Leigh Hwa
To:	Donald Washburn
Cc:	Nikole CH. Coleman
Subject:	Re: Fw: Pinnacle at Liberty Bay - Revised Project Document Link
Date:	Saturday, November 7, 2026 11:35:26 PM
Attachments:	Outlook-mguwpi3t.png Outlook-tumlfcmc.png

Dear Mr. Washburn,

Thank you for your response to my questions.

As the owner of Crystal View Lot 46, which is directly affected by this project, I am relying on the City to ensure that the applicant provides complete and consistent information so that property owners can understand the proposed changes and provide meaningful comments before a decision is made.

After reviewing the project documents, I still have several concerns about missing and inconsistent information, particularly in Exhibit 3.b – ESM Retaining Wall and Landscape Narrative

1. Tract G – Wall Location and Design

You confirmed on November 3 that Section G-G represents the fill-style retaining wall proposed directly west of Lot 46. However, the site plan shows the Tract G wall only 7 ft 3 in to 7 ft 4 in from my property line, rather than the 15 ft shown in Section G-G.

I would like the City to request the applicant to clarify this discrepancy and explain why the proposed design and dimensions are different. I expect the Tract G wall to conform to the style and dimensions shown in Section G-G, with sufficient details included in the project plans for affected property owners to understand what is actually being proposed.

At a minimum, I would like the following information in the plans for the wall west of the Lot 46 property line:

- The retaining wall system and construction type, including the cross-section.
- The exact distance from the wall face to my property line.
- The proposed wall height.
- The wall grade, batter, and slope.
- The proposed screening and landscaping.

2. Structural Design – What Has Changed?

In Exhibit 3.b, Section G-G describes the wall construction as "structural fill (TYP)." Based on this, I would therefore expect similar structural fill and reinforcement to be incorporated into the retaining wall design.

However, I do not see the same structural details indicated for Tract G. Please

require the applicant to explain the reason for the tract change and the structural change affecting Tract G, and what structural fill, reinforcement, or alternative construction method is now proposed for Tract G, if any, and provide the supporting design details.

3. Wall Stability and Geotechnical Justification

Given that the wall height remains approximately 8 ft, as indicated in Section G-G, while no MSE reinforcement is identified for Tract G, I am concerned about how the proposed wall will achieve adequate structural stability.

Please require the applicant to explain:

- What structural system or reinforcement, if any, is proposed to support the Tract G wall.
- How the wall's stability will be achieved under the proposed site conditions.
- What geotechnical analysis and engineering basis support the proposed design.

I would also like confirmation that the final plans will clearly show the entire wall structure, including footings, reinforcement, and drainage, in relation to my property line.

Request Before the November 17 Meeting

I respectfully request that the City ensure these discrepancies are addressed and the requested supporting information is made publicly available before the November 17 meeting.

Without complete and consistent plans and supporting engineering information, we cannot properly evaluate the proposed design or understand its potential impact on my property. As a directly affected property owner, I believe it is important that these issues be resolved and documented in the project record before the City proceeds with its review or makes any related decision.

Thank you for your attention to these concerns.
Li Hua
Owner, Crystal View Lot 46

On Fri, Nov 6, 2026 at 10:22 AM Donald Washburn <dwashburn@poulsbo.gov> wrote:

> Good morning Leigh,
>
> As I'm sure you're already aware, these site plans are purely conceptual at this stage. The placement of retaining walls on these drawings is more of a preliminary concept rather than a final approved construction plan. The infrastructure and drainage systems associated with retaining walls would be evaluated and reviewed during our Civil Grading Permit review, which is entirely separate from our Land Use review. The Geotechnical Addendum from the applicant dated June 17, 2026 indicates that retaining walls of up to 20 feet in height may be used to accommodate grade changes throughout the site.

It certainly does appear that Tract G is narrowed further to the north. I'm unclear what the reasoning is for the narrowed tract in that portion of Tract G. One possibility would be that the wall type in that area requires less buffer than other larger retaining walls on site.

As of this email, we have no indication that MSE reinforcement is being proposed for the walls on Tract G. If MSE reinforcement were to be used, the entire wall system would need to be contained within the project boundary. We wouldn't allow MSE reinforcement on private property.

You are correct in that the City has made clear to the applicant that we will not accept ownership of retaining walls within developments. Generally, retaining walls supporting private development are the responsibility of the HOA associated with that development. This will be a City condition of approval for the project if and when it moves forward.

Best,

Donald Washburn
Engineering Technician

City of Poulsbo
200 NE Moe Street
Poulsbo, WA 98370
Main Line # 360-394-9882
Direct Line # 360-394-9767

From: Leigh Hwa <leighhwa@gmail.com>
Sent: Wednesday, November 4, 2026 12:03 AM
To: Donald Washburn <dwashburn@poulsbo.gov>
Cc: Nikole CH. Coleman <ncoleman@poulsbo.gov>
Subject: Re: Fw: Pinnacle at Liberty Bay - Revised Project Document Link

Dear Mr. Washburn,

Thank you for your explanation and the Bluebeam measurements for the wall west of Crystal View Lot 46. I am preparing a comment for the November 17 Planning Commission meeting. With the wall now 7 ft 3 in to 7 ft 4 in from my lot line rather than 15 ft, my concern is the narrowed buffer — less room for drainage, maintenance access, and screening — and I would like to understand the change and its implications:

1. Tract narrowing — which controls? Figure 1, Section G-G (ESM narrative, September 16, 2026) labels a 15-ft tract to the project boundary, but your site-plan measurements show 7'-3" and 7'-4" from the wall to the Lot 46 lot line. Has the tract been narrowed from 15 ft to 7 ft 3 in to 7 ft 4

in, and if so, why? Which controls for the final design — the typical section or the site-plan measurement — and is that the final wall-face-to-lot-line distance?

2. MSE reinforcement — effective and within the property line? With the tract narrowed to 7'-3" to 7'-4", could you help explain how the MSE reinforcement for the G-G wall can be both fully effective and contained entirely on the project side of the Lot 46 lot line? Please confirm on the final civil plans the full extent of the reinforcement zone, footings, and drainage relative to my lot line, and whether any component extends beneath Lot 46 or requires an easement. I have not granted any easement beneath Lot 46, and I ask that **the tract west of Lot 46 be restored to at least 15 ft, consistent with the other sections of the retaining wall.**

3. Drainage and groundwater. Please kindly clarify how groundwater intercepted by the retaining wall system will be managed, where wall drainage will discharge, and what protections will prevent seepage, erosion, or altered runoff from affecting Lot 46 and neighboring Crystal View lots. Please also identify the drain pipe size, drain rock, and outlet locations for this wall.

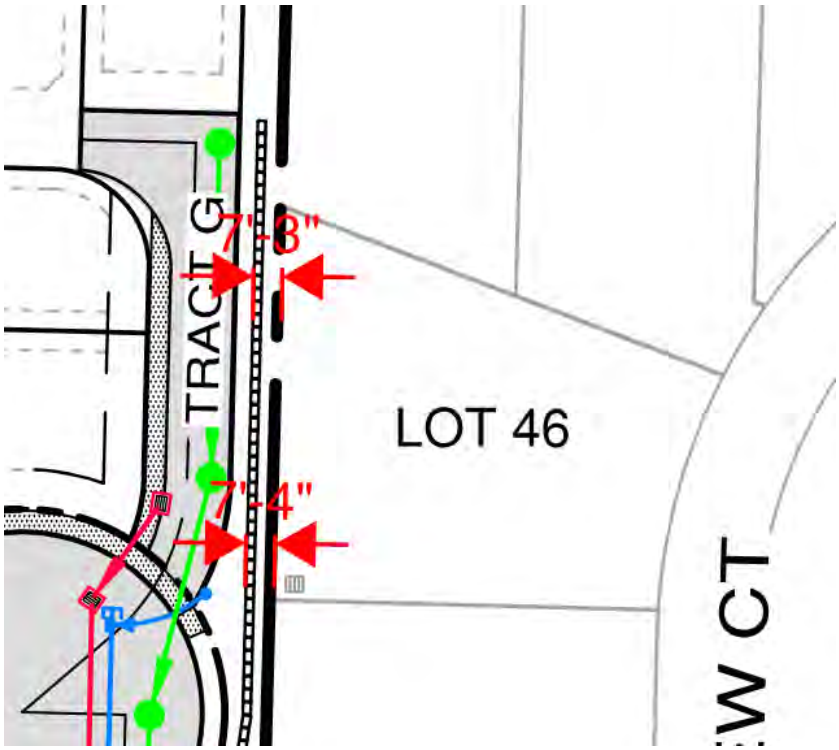
4. Long-term maintenance responsibility. The City has stated it will not accept ownership or long-term maintenance of retaining walls supporting private development. Before any approval, please identify who will own, inspect, and pay to repair or replace the walls abutting Crystal View lots, and what enforceable mechanism guarantees that obligation. Exhibit 3.b states the walls will be exclusively HOA-owned and maintained, but other wording in the document suggested "HOA or lot owners as applicable" — please confirm which controls.

5. Geotechnical support for the proposed heights. Please identify the geotechnical report supporting the proposed wall heights adjacent to Lot 46, including global stability and groundwater conditions, and confirm what supports the G-G wall and any terraced totals.

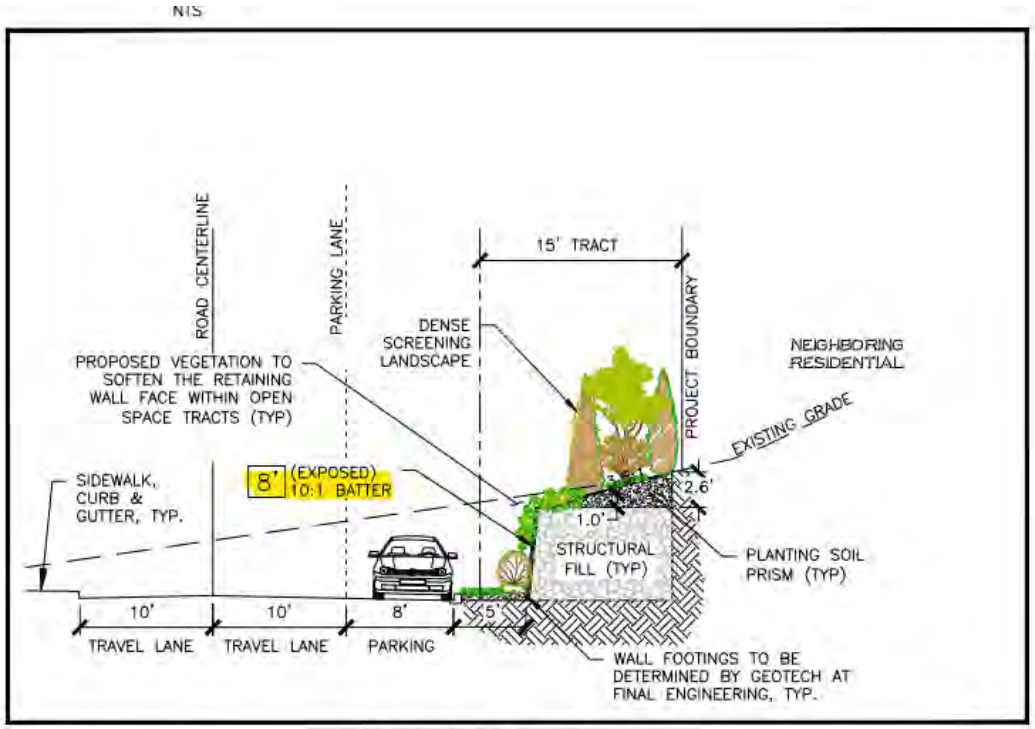
Thanks,
Li Hua
Owner, Crystal View Lot 46

On Tue, Nov 3, 2026 at 8:55 AM Donald Washburn <dwashburn@poulsbo.gov> wrote:

> Good Morning Leigh,
>
> I received an email from you regarding some questions on Pinnacle at Liberty Bay. You are correct that cross section G-G is the style of fill being proposed directly to the west of lot 46 on Crystal View.
>
> On the most recent site plan for Pinnacle at Liberty Bay, it appears the face of the proposed wall in that tract (Tract G) is around 7ft from the Crystal View Lot 46 lot line.



Looking at the details for section G-G, it appears that the wall height being proposed in this section is 8ft.



SECTION G-G

Let me know if you need anything else,

Donald Washburn
Engineering Technician

City of Poulsbo
200 NE Moe Street
Poulsbo, WA 98370
Main Line # 360-394-9882
Direct Line # 360-394-9767

From: Nikole CH. Coleman <ncoleman@poulsbo.gov>
Sent: Tuesday, November 3, 2026 7:42 AM
To: Donald Washburn <dwashburn@poulsbo.gov>
Subject: FW: Pinnacle at Liberty Bay - Revised Project Document Link

Are you able to respond to this question? Perhaps you could measure in blue beam?

Nikole Coleman, AICP (she/her/hers)
Planning Manager
City of Poulsbo | 200 Moe Street | Poulsbo, WA 98370
PED General Line: (360) 394-9748
Planning and Economic Development | City of Poulsbo
Click here to sign up for our monthly newsletter

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From: Leigh Hwa <leighhwa@gmail.com>
Sent: Tuesday, November 3, 2026 12:17 AM
To: Nikole CH. Coleman <ncoleman@poulsbo.gov>
Subject: Pinnacle at Liberty Bay - Revised Project Document Link

Dear Ms. Coleman,

I am preparing a written comment for the November 17 Planning Commission meeting on Pinnacle at Liberty Bay. In Exhibit 3.b (ESM Retaining Wall and Landscape Narrative, September 16, 2026), Figure 1 shows cross-sections A-A through G-G, but the key maps do not identify which section runs along the boundary shared with my property (Crystal View Lot 46). Could you please confirm:

1. For each such section, what is the distance from the wall face to the Crystal View Lot 46 lot line, and the total terraced wall height at that location?
2. Section G-G labels the adjacent land only as "neighboring residential" — does that section abut Lot 46, or a different neighboring property?

Thanks,
Li Hua
Owner, Crystal View Lot 46

On Mon, Nov 2, 2026 at 2:13 PM 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 City of Poulsbo has determined that the Pinnacle at Liberty Bay PRD and Prelliminary Subdivision proposal does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. The terms of the mitigation are established in Exhibit A, attached to this decision. This MDNS is issued under WAC 197-11-355, Optional DNS Process**. There is no further comment period.**

- SEPA Determination
- PED Department SEPA Memo
- Engineering Department Memo
- Exhibit A: SEPA Mitigations
- Exhibits B-I can be found here.

You can find more information on the project HERE.

Any agency or person may appeal this SEPA determination by filing a written appeal and paying a fee to the PED department no later than 4:30 p.m. on Monday, November 16, 2026, in accordance with the procedures set forth in PMC 16.04.250 and Chapter 19.70.

Staff Contact: Nikole Coleman, AICP, Planning Manager, ncoleman@poulsbo.gov

Poulsbo, WA 98370 US

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Constant Contact

From:	Leigh Hwa
To:	City of Poulsbo Planning and Economic Development
Cc:	Nikole CH. Coleman
Subject:	Written Comment — Pinnacle at Liberty Bay — Planning Commission Meeting November 17, 2026
Date:	Sunday, November 15, 2026 11:44:14 PM

Dear Chair and Members of the Planning Commission,

I am a property owner in Crystal View, next to the proposed Pinnacle at Liberty Bay development.

The published proposal and Exhibit 3.b do not have all the information property owners need to review the retaining walls and understand their impact.

Exhibit 3.b – ESM Retaining Wall and Landscape Narrative

Take the wall next to Crystal View as the example. Exhibit 3.b, Section G-G, shows an 8-foot wall, a 15-foot tract, and construction as "structural fill (TYP)." But City Engineering confirmed the Tract G wall is different from what Section G-G shows. The wall is only 7 ft 3 in to 7 ft 4 in from the neighboring property line, not 15 feet. The tract was narrowed, with no explanation. And no MSE reinforcement is indicated for Tract G, even though the wall is still 8 feet high.

That information is missing from the public documents. Figure 1 still labels a 15-foot tract. Nothing flags the change. The Staff Report also leaves the wall design to later engineering, so the record does not say which system is proposed for Tract G, or what supports it.

At a minimum, the applicant should provide, for the walls next to neighboring properties:

- The wall system and cross-section
- The exact distance from the wall face to the property line
- The wall height, grade, and batter
- How an 8-foot wall with no MSE reinforcement is stable, and the geotechnical basis for it
- The drainage design and the full extent of the wall system, including footings and reinforcement

Please do not recommend approval while this information is missing.
Without it, property owners cannot review the proposal or understand its impact. If the information cannot be provided before November 17, please defer the recommendation or condition it on the applicant providing it, with the tract restored to at least 15 feet.

Thank you,

Li Hua
Neighboring property owner, Crystal View

Chris and Niki Froines
18323 Sunrise Ridge Ave. NE
Poulsbo WA 98370

November 14, 2026

Poulsbo Planning Commission
City of Poulsbo Hearing Examiner
c/o Nikole Coleman, Planning Manager
Planning and Economic Development Department
200 NE Moe Street
Poulsbo, WA 98370
Via email: ncoleman@poulsbo.gov

Re: Objection to Pinnacle at Liberty Bay Planned Residential Development and Preliminary Subdivision — Permit No. P-06-20-25-03

Dear Ms. Coleman, Planning Commissioners, and Hearing Examiner:

We live at the north end of Sunrise Ridge Avenue NE, north of the proposed Pinnacle at Liberty Bay development. We object to approval of this 130-home subdivision unless its access and circulation plan protects our existing neighborhood from additional through traffic. We request that ordinary subdivision traffic using Sunrise Ridge Avenue NE be directed south toward Johnson Parkway NE, with an effective restriction preventing that traffic from traveling north through our neighborhood.

We recognize the importance of connectivity and emergency access. Those objectives must be evaluated together with the City's obligation to ensure safe traffic circulation and protect existing residents. A planned roadway connection does not, by itself, establish that unrestricted traffic through the northern neighborhood will be safe or that all approval criteria are satisfied.

Required findings concerning traffic and public safety

PMC 17.60.040(A)(3)(a) requires adequate provision for roads and a street system providing safe, orderly, and efficient traffic circulation. Subsections (e), (g), and (h) require safe walking conditions for students, adequate fire and emergency access, and protection of public health, safety, and welfare. Under PMC 17.60.040(B), the preliminary plat must be denied if the required findings cannot be made, unless specified conditions fully satisfy the criteria. PMC 17.60.050 requires written findings and conclusions based on the record. RCW 58.17.110 independently requires findings concerning adequate roads, public safety, safe student walking conditions, and the public interest.

These requirements call for an evaluation of the streets that would actually carry the development's traffic, including northern Sunrise Ridge Avenue NE. General conclusions about intersection capacity or the benefits of connectivity do not resolve whether additional traffic can safely pass existing homes, driveways, and pedestrian routes. Residents, visitors, deliveries, service vehicles, and construction activity all contribute to that burden. Adding an additional 130 homes to this access would overload our street.

Johnson Parkway was intended to improve access to housing and surrounding properties

The City previously advertised the Johnson Parkway/SR 305 project as supporting development traffic toward that new southern highway connection. The City identified improved housing access, reduced congestion, and economic development opportunities among the project's benefits. Its project description states that the roundabout was built "to improve traffic mobility and to provide safer access to SR305." [1]

The September 29, 2021, Ekelmann–Divoky annexation staff report explains that the Johnson Parkway and SR 305 roundabout project would connect SR 305 to Noll Road and provide a future access to this development. It also identifies access and future utility connection opportunities for properties accessing Johnson Road such as this development. [2] Access thru these enhancements should be required before adding more traffic to Sunrise Ridge.

The City subsequently applied that access framework to nearby residential development. Its May 6, 2024, engineering memorandum for the proposed 60-home Audrey Estates subdivision identifies access from Johnson Parkway as the preferred route. [3] The City's current Pinnacle project description likewise identifies Johnson Parkway as a proposed vehicular access route. [4]

These records support requiring the applicant to demonstrate how the southern Sunrise Ridge/Johnson Parkway connection can accommodate ordinary project traffic while protecting existing residents to the north. We acknowledge that the City's plans also contemplate a Sunrise Ridge connection. However, identifying that connection does not resolve or discuss how unrestricted daily travel through northern Sunrise Ridge is necessary or safe.

Please identify and include in this project's record that includes the Johnson Parkway corridor studies, traffic forecasts, and funding materials addressing anticipated residential development in this area. Explain whether those forecasts included the Pinnacle property and other nearby subdivisions, what traffic distribution was assumed, and how the present proposal compares with those assumptions.

The engineering review identifies access deficiencies

The October 28, 2026, engineering memorandum concerning connectivity and multiple points of access identifies deficiencies in the submitted design absent recommended conditions. It explains that the proposed arrangement lacks required roadway redundancy, connectivity, and emergency access. It also identifies the NR-12 Baywatch connection as a means of distributing traffic rather than concentrating it on Sunrise Ridge and the Crystal View neighborhood. [5]

We understand that staff also considers completion of the NR-13 Sunrise Ridge connection necessary under the City's adopted transportation framework. The City needs to distinguish the requirements for roadway completion and emergency access from any requirement for unrestricted ordinary vehicle travel through the northern neighborhood. Please identify the specific provisions that would preclude an emergency-only northern connection or another protective circulation design.

The city needs to address the following issues before approving this development:

1. Traffic passing existing homes. Provide existing counts and projected daily and peak-hour volumes for northern Sunrise Ridge, both with and without the Baywatch connection. Identify project traffic distribution and additional through traffic the new connection could attract from outside the subdivision.

2. Road and pedestrian conditions. Evaluate roadway width, grades, curves, sight distances, driveway conflicts, operating speeds, sidewalks or shoulders, crossings, and applicable school walking routes. Identify deficiencies and the improvements necessary to accommodate projected traffic safely.

3. Alternatives protecting the northern neighborhood. Evaluate directing ordinary project traffic south to Johnson Parkway, restricting the northern connection to emergency vehicles, and physical controls or other designs that prevent additional through traffic while preserving existing residents' access.

4. Emergency access. Obtain written findings from the appropriate engineering and fire officials identifying the independent routes required, the deficiencies each connection resolves, and whether adequate emergency access can be provided without unrestricted daily traffic through our neighborhood.

5. Construction and phasing. Identify construction routes, anticipated heavy-vehicle traffic, and access arrangements for each phase. Address the effects of occupancy before all required connections and protective improvements are complete.

Additional Planned Residential Development findings

PMC 18.260.140 requires findings addressing the site's suitability for the proposed intensity of development, compatibility with surrounding uses, adequate public access and appropriate neighborhood connectivity, consistency with adopted standards, and protection of public health, safety, and welfare. Please address those findings specifically in relation to the existing northern neighborhood. Explain how the proposed routing is compatible with existing conditions and what measures will prevent or mitigate adverse effects.

Requested conditions and decision

We request approval only with a design directing ordinary subdivision traffic using Sunrise Ridge south toward Johnson Parkway and preventing that traffic from traveling north past our home.

The restriction should use an effective, City-approved design; signs alone should not be assumed sufficient. Any emergency-only connection must have controls approved by the appropriate emergency authorities. Existing residents must retain access to their homes, and pedestrian access should be addressed separately from ordinary motor-vehicle access.

Protective measures must apply during construction and every development phase. PMC 17.60.040(C) requires each separately approved division to satisfy the applicable criteria independently. Any deferral of a required connection or improvement must therefore be supported by explicit findings explaining how the intervening phase will comply and protect existing residents.

Required controls and improvements should appear on the approved plans and in enforceable conditions specifying installation deadlines, maintenance responsibilities, and enforcement. Essential access and safety questions should be resolved in the land-use decision, with final engineering implementing those requirements.

If the requested northern restriction is rejected, please identify the supporting evidence and specific requirements, explain why protective alternatives cannot satisfy them, and identify the measures that will address the resulting neighborhood impacts. If the applicant cannot

demonstrate compliance through its design and enforceable conditions, we request denial or a revised design before approval.

Please include this letter and the referenced materials in the record before both the Planning Commission and Hearing Examiner, distribute it to the reviewing engineering and fire officials, and provide a written response to these issues. Please add us to the notification list for revised plans, future meetings and hearings, and the final decision.

Sincerely,
/s/
Chris and Niki Froines
Residents of northern Sunrise Ridge Avenue NE
Poulsbo, Washington

Referenced materials

1. City of Poulsbo, Johnson Parkway project description and benefits

2. Ekelmann–Divoky Annexation staff report, September 29, 2021, printed page 9

3. Audrey Estates engineering memorandum, May 6, 2024, first memorandum page

4. City of Poulsbo, Pinnacle at Liberty Bay project description

5. Engineering connectivity and access memorandum, October 28, 2026, Exhibit 9.q

Outlook

Concerns Regarding the Pinnacle at Liberty Bay Development — File No. P-06-20-25-03

From Brad Johnson <bradjohnson429@gmail.com>
Date Mon 11/16/2026 9:42 AM
To City of Poulsbo Planning and Economic Development <information@cityofpoulsbo.com>

You don't often get email from bradjohnson429@gmail.com. Learn why this is important

November 16, 2026

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

Subject: Concerns Regarding the Pinnacle at Liberty Bay Development — File No. P-06-20-25-03

Dear Planning Commissioners,

I am writing to share my concerns about the proposed Pinnacle at Liberty Bay development off Johnson Parkway, particularly the plans to connect the development to Baywatch Court.

I understand Poulsbo is growing, and new housing is part of that growth. I'm not opposed to development, but I do believe we need to be more thoughtful about how these projects affect existing neighborhoods and the roads we all depend on.

My biggest concern is traffic. While Johnson Parkway was built to help accommodate growth in this area, adding another entrance through Baywatch Court could create problems that go well beyond the immediate neighborhood. Opening Baywatch Court to the new development will change traffic patterns. Residents will naturally use whichever route is most convenient, which could significantly increase the number of vehicles traveling through Baywatch Court and the surrounding neighborhood. These are established residential streets, not roads intended to serve as major access routes for additional subdivisions.

What concerns me most is the intersection of Baywatch Court and Highway 305. Currently, vehicles traveling westbound on Highway 305 and turning left into Baywatch Court have to wait for a break in oncoming traffic. From what I've observed, there is barely enough room for one vehicle to wait for that turn without affecting traffic behind it. Now imagine several vehicles trying to make that same turn during the afternoon commute. It would not take many cars before traffic begins backing up into the travel lane on Highway 305. That creates the potential for sudden stops, rear-end collisions, and unnecessary congestion on an already busy highway. This isn't just a concern for people living on Baywatch Court. It affects everyone traveling that stretch of Highway 305. What I find especially troubling is that the traffic study appears to have been prepared without accounting for development traffic using Baywatch Court.

Yet, the City is considering requiring that connection. If the roadway connection changes, shouldn't the traffic study reflect how people will actually use it? I would like to know whether the City has specifically looked at how many vehicles will use Baywatch Court to enter and leave the development, especially during morning and afternoon commute hours. Has anyone evaluated how many vehicles can safely wait to turn left off Highway 305? What happens when several cars arrive at once, and traffic is too heavy to make the turn?

These seem like basic questions that should be answered before a decision is made. I also believe WSDOT needs to be involved in reviewing this intersection. If additional traffic is going to require a dedicated turn lane, improvements to the intersection, or other safety measures, those needs should be identified and addressed before the development moves forward.

There is also the larger issue of how this development will affect traffic throughout the area. Johnson Parkway, Sunrise Ridge Avenue, and the surrounding streets will all see changes in how traffic moves. I would like to see a traffic study that considers the combined effects of this project and the other nearby development, rather than looking at each project separately.

Beyond traffic, I am concerned about the continued loss of wooded areas and the impact on wildlife, drainage, and the overall character of Poulsbo. One reason people choose to live here is the balance between neighborhoods and natural surroundings. I would hate to see that gradually disappear as more land is developed without enough consideration for the long-term consequences.

I also question whether our roads, utilities, and public services are keeping pace with the amount of development being approved. These are issues that should be addressed as part of the planning process, not after homes are built and existing residents begin experiencing the problems.

Regarding Baywatch Court specifically, I would encourage the City to consider whether a full vehicle connection is even necessary. If the purpose is to provide additional emergency access or pedestrian connectivity, perhaps those needs could be met without opening the street to unrestricted daily traffic. At a minimum, I believe the City should require an updated traffic study that includes the Baywatch Court connection, examines the potential for backups on Highway 305, and identifies any improvements necessary to make that intersection safe. Those findings should be available for public review before a final decision is made.

I don't believe it makes sense to approve or require a road connection and then deal with the resulting traffic problems after the fact. Once the homes are built and the traffic patterns are established, correcting those problems becomes much more difficult and expensive. Poulsbo is a great place to live, and I would like to see it stay that way. Growth is inevitable, but how we manage that growth is a choice. We owe it to both current and future residents to make sure these decisions are made with a clear understanding of their consequences.

Thank you for taking the time to consider my concerns. I would appreciate a response addressing the Highway 305 intersection and the City's plans for evaluating the Baywatch Court connection. I also request that this letter be included in the public record for the Pinnacle at Liberty Bay development.

Sincerely,

Bradley Johnson
Poulsbo, Washington

Outlook

Public Comment – Pinnacle at Liberty Bay Development – Environmental and Neighborhood Concerns

From Stacy Rayner <stacyrayner@hotmail.com>
Date Fri 11/13/2026 9:28 AM
To City of Poulsbo Planning and Economic Development <information@cityofpoulsbo.com>

You don't often get email from stacyrayner@hotmail.com. Learn why this is important

Good afternoon,

I am writing as a Poulsbo homeowner to express my concerns about the proposed Pinnacle at Liberty Bay development.

My husband and I chose Poulsbo because of its natural beauty, wildlife, and sense of community. While I understand the need for growth, I question whether our roads and infrastructure can support the continued pace of development without negatively affecting the environment and existing neighborhoods.

Adding 130 homes could bring hundreds of additional vehicles onto Johnson Parkway and surrounding roads. These roads already serve growing neighborhoods, and much of the traffic ultimately feeds into the same corridors and intersections. I worry about increased congestion, safety, and whether the existing road system has the capacity to handle this growth, especially when considering other developments in the area.

The environmental impact is equally troubling. Clearing approximately 41 acres could mean losing mature trees, disrupting wildlife habitats, and affecting nearby streams and natural drainage areas. With our rainfall, changes to the landscape can increase runoff and erosion, potentially affecting surrounding properties and waterways. Once these natural areas are gone, they cannot easily be restored.

My concern goes beyond this one project. Continued development is adding traffic and placing greater demands on infrastructure while reducing the wooded areas and wildlife habitats that make Poulsbo special.

I am not opposed to responsible growth, but I believe we need to consider whether the area can reasonably support it and what we may permanently lose in the process.

I respectfully ask the city to carefully consider the cumulative traffic impacts, existing road capacity, and preservation of wildlife habitats, streams, and natural areas before approving this development.

Please include my comments in the official public record and share them with the appropriate decision-makers.

Thank you for your consideration.

Stacy Rayner
Poulsbo, Washington

November 16, 2026

To:
Heather Wright, SEPA Responsible Official & PED Director
City of Poulsbo Planning Commission, City Council & Hearing Examiner
City of Poulsbo Planning and Economic Development (PED) Department
200 NE Moe Street
Poulsbo, WA 98370
Submitted Via Email to:
plan&econ@cityofpoulsbo.com

RE: Public Comment on Pinnacle at Liberty Bay PRD and Preliminary Plat & Preliminary Conditions of Approval (P-06-20-25-03)
Unlawful SEPA Segmentation, Improper Use of Optional DNS Process (WAC 197-11-355), and Objection to Unanalyzed Connector Road from Proposed PRD Through Baywatch Ct NE to SR 305.

Dear Director Wright, Planning Commissioners, City Council and Hearing Examiner:

I am a resident of the Baywatch neighborhood, an established 23-lot residential community adjacent to the proposed **Pinnacle at Liberty Bay PRD.** I formally object to the City's **November 2, 2026 Mitigated Determination of Nonsignificance (MDNS)** and strongly urge that the City **withdraw the MDNS and strike the mitigation condition requiring a road and utility connection from the development through Baywatch Ct NE to SR 305.**

The City of Poulsbo issued the SEPA Mitigated Determination of Non-Significance (MDNS) on November 2 and required access through Baywatch Ct. NE be included as mitigation for traffic impacts of the Pinnacle at Liberty Bay Development. This is not what the Mayor assured us at our HOA meeting in April. He explicitly told us Baywatch Ct. will NOT be used to provide access to the proposed project.

The City omitted the road from the SEPA checklist, told residents in April it wouldn't happen, used the Optional DNS Process (WAC 197-11-355) to bypass a post-determination comment period and then demanded a $4000+ appeal fee to challenge an unstudied road. That the City, omitted the Baywatch Ct NE connector from the SEPA project description, and slipped an unanalyzed road through critical areas into the MDNS conditions – appears to be a violation of Washington SEPA law.

The City's insertion of an unstudied, unengineered road across regulated critical areas as a "mitigation condition" violates the State Environmental Policy Act (SEPA), deprives state agencies and the public of mandatory notice and review, and creates new environmental impacts and severe public safety hazards.

1. **Unlawful Use of the Optional DNS Process & Deprivation of Public/Agency Review (WAC 197-11-355 & WAC 197-11-060).** The City issued its November 2, 2026 MDNS under the Optional DNS Process (WAC 197-11-355), stating that "there is no further comment period" because environmental review supposedly occurred during the earlier Notice of Application comment period. However, neither the Notice of Application, the project description, the project scope, the SEPA Environmental Checklist, nor the submitted engineering plans included a road connection through Baywatch Ct NE.
    - **Misrepresentation to Residents:** At our April 2026 HOA meeting, Mayor Stern explicitly assured Baywatch residents that Baywatch Ct NE would not be used as access to the proposed project. Consequently, residents had zero notice that a connector road would be mandated.
    - **Regulatory Blindspot Created by the City:** Following the November 2 MDNS release, I contacted Ecology, WSDOT, and WDFW. Because the City omitted the Baywatch connector road from the project description, project scope, and only introduced it as an MDNS condition, these reviewing agencies were deprived of a complete project description (WAC 197-11-060) and had no opportunity to evaluate the road's environmental and highway impacts during the comment period.
    - **Improper Piecemealing/Segmentation:** Under WAC 197-11-060(3), a lead agency cannot omit major project infrastructure from SEPA review and later impose it as an unanalyzed mitigation condition. A new roadway crossing streams, wetlands, and steep slopes is a major action with probable significant adverse impacts that cannot be imposed without prior environmental analysis.
    - **Unlawful Degradation of Critical Areas (GMA & SEPA):** The city-required connector road cuts directly across a stream and regulated wetlands at the base of a mapped landslide hazard area. Under Washington's Growth Management Act (RCW 36.70A) and the State Environmental Policy Act (SEPA), the City is legally obligated to follow a strict mitigation sequence that prioritizes **avoidance** of critical area impacts before considering minimization or compensation.
2. **Unanalyzed Degradation of Critical Areas & Lack of WDFW HPA Review (PMC 16.20 & RCW 36.70A**). The mandated connector road cuts directly across a salmon-bearing stream and regulated wetlands at the base of a landslide hazard area.
    - Constructing a road and trenching utilities at the toe of a steep landslide hazard zone risks destabilizing the slope and creating severe future liability for the City.
    - Introducing permanent impervious surfaces and toxic stormwater runoff directly into a stream and wetland violates "no net loss" ecological standards when reasonable on-site design alternatives exist.
    - **ZERO Geotechnical or Habitat Analysis:** No geotechnical slope stability study, wetland delineation, or stream crossing design has been prepared or reviewed for this City required alignment. Constructing a roadway and trenching utilities through multiple critical area risks catastrophic slope failure and exposes the

City to severe liability. Notably, the City's MDNS notification doesn't even identify Landslide Hazards as a critical area in it's project overview.

- **Missing WDFW Hydraulic Project Approval (HPA) Context:** WDFW has confirmed that crossing this stream will require HPA Approval, yet WDFW was never provided plans or SEPA notice to evaluate fish passage, riparian buffer destruction, or stormwater impacts prior to the MDNS. Under Poulsbo's Critical Areas Ordinance (PMC 16.20), the City must prioritize **avoidance** of critical area impacts when reasonable on-site alternatives exist.

3. **Deficient Traffic Impact Analysis (TIA) & Unstudied SR 305 Bottleneck.** The City's TIA evaluated access via NE Crystallia Court/Johnson Parkway NE and Sunrise Ridge Avenue NE.
   - Baywatch Ct NE's intersection with SR 305 was designed and permitted for low-volume rural/suburban traffic (a 23-lot residential cul-de-sac).
   - Baywatch Ct NE is a private street – not a local street designed with a capacity to distribute new trips from multiple new developments.
   - Funneling cut-through traffic from 130 new homes (roughly 1,200+ additional daily vehicle trips) onto Baywatch Ct NE will create severe traffic hazards including: vehicle queuing at SR 305; increase risk to children and pedestrians at or walking to or from school bus and transit stops; and elevate rear-end and turning collision risks on a state highway.
4. **Flawed Fire Access Justification & Winter Inaccessibility on Baywatch Ct NE**. The City's claim that a connection through Baywatch Ct NE is needed for secondary fire access is factually false and dangerous.
   - **Winter Failure:** Baywatch Ct NE is an inaccessible cul-de-sac (a cul-de-sac that cannot be reached by standard emergency vehicles due to grade, width, or other constraints). It features a steep grade where emergency vehicles and City Street sanders have historically been unable to climb to the top of the hill during icy weather. Mandating an emergency access route onto a non-compliant street that already fails in winter conditions not only **increases the risk to residents on Baywatch Ct NE** but undermines overall public safety.
   - **Existing Dual Access & On-Site Remedies:** The project already proposes two primary access points (NE Crystallia Court/Johnson Parkway NE and Sunrise Ridge Avenue NE). If the applicant's internal roadways are too narrow or steep for fire apparatus (as documented in the Fire Marshall's letter), **the city must require the applicant to widen its internal streets or reduce lot density – not degrade stream habitat, wetlands and force cut-through traffic onto an established 23-lot neighborhood**.
5. **Lack of Essential Nexus and Proportionality (RCW 82.02.020).** Under Washington law (RCW 82.02.020) and established constitutional standards, development mitigation must bear a direct nexus and rough proportionality to the project's impacts. Notably, even the project applicant opposes this connection due to its extreme environmental and engineering challenges. A city cannot force an off-site infrastructure connection through environmentally protected land simply to bail out

a site layout that is too dense for the site conditions: steep slopes, streams and wetlands. The required road as mitigation for traffic impacts merely shift and intensify severe traffic burdens directly into Baywatch, an established residential neighborhood that is already burdened by a non-compliant street built and approved exceeding the maximum allowed grade. Requiring an off-site road through protected critical areas onto an already overburdened non-compliant street solely to compensate for an overly dense internal site layout is neither safe,reasonable nor legally defensible.

While recognizing the City's duty to ensure safe public infrastructure, forcing a new roadway across sensitive critical areas and funneling traffic onto a steep, residential cul-de-sac is legally flawed, environmentally destructive, and creates severe public safety hazards – without actually mitigating the traffic, fire safety and operational impacts associated with the pproposed internal road design.

Conclusion and Relief Requested

For the foregoing reasons, I respectfully request that the City of Poulsbo:

1. **Withdraw the November 2, 2026 MDNS** due to procedural violations of WAC 197-11-355 and WAC 197-11-060, and require a revised SEPA threshold determination with a full public and agency comment period:
2. **Strike the mitigation condition** requiring a road and utility connection between Pinnacle at Liberty Bay PRD and **Baywatch Ct NE**; and
3. **Require the applicant** to resolve all internal fire-access/operational/navigational constraints entirely on-site through internal road redesign or lot reduction.

Please enter this letter into the official record for Project No. P-06-20-25-03 for both the November 17, 2026 Planning Commission meeting and the December 3, 2026 Hearing Examiner Public Hearing.

Sincerely,
Glynis Casey
Resident, Baywatch Ct NE
Poulsbo, WA 98370

November 16, 2026

VIA E-MAIL ONLY TO
plan&econ@cityofpoulsbo.com

City of Poulsbo Planning Commission
Poulsbo Planning & Economic Development Department
200 E. Moe St., 2nd Floor
Poulsbo, WA 98370

Re: Dana and Katharine Lockhart's Comments on Pinnacle at Liberty Bay Planned Residential Development and Preliminary Plat, File No. P-06-20-25-03

Dear Members of City of Poulsbo Planning Commission:

On behalf of Dana and Katharine Lockhart, we present the following comments regarding the proposed Pinnacle at Liberty Bay Planned Residential Development ("PRD") and Preliminary Plat, File No. P-06-20-25-03. The Lockharts believe the proposal from Montebanc Management, LLC ("Applicant"), is insufficient for the City of Poulsbo Land Use Hearing Examiner to make the mandatory findings for approval required by PMC 18.260.140. Specifically, the proposal is deficient in regarding the requisite findings in subsections F, I, J, K, and L. Since the proposal is deficient, and cannot be approved by the Examiner, the Commission should not recommend approval but should instead recommend denial, or approval with conditions additional to those presently proposed. We ask that the Planning Commission consider these comments at its hearing on the Pinnacle PRD scheduled for Tuesday, November 17, 2026.

The Lockharts reside in their home at 1780 NE Crystal View Court, Kitsap County Parcel No. 5699-000-044-0003, which is located within the City's existing Crystal View subdivision. The Lockharts' home is located immediately across Pinnacle's "Road B," opposite proposed lots 56, 57, and 60. As such, they would be directly and substantially impacted by the proposed Pinnacle PRD, and have a strong interest in making sure the proposal complies with applicable requirements of the Poulsbo Municipal Code.

In this letter, we discuss three reasons why the Planning Commission should recommend denial of the Pinnacle PRD—the first deals with the consistency requirements at PMC 18.260.070.A and PMC 18.260.140.F; the second addresses deficiencies in the Applicant's design for Sunrise Ridge Avenue NE; the third addresses concerns about public safety and the proposed wall designs. We discuss each in turn below.

A. The proposed PRD does not comply with the City's consistency requirement at PMC 18.260.070.A. As such, the Examiner cannot make the mandatory compatibility finding required by PMC 18.260.140.F.

In order for the proposed Pinnacle PRD to be approved, the Hearing Examiner "must make" the findings enumerated at PMC 18.260.140, including that:

> The proposal would be ***compatible*** with existing and future land uses within the general area and in which the proposal is to be located by **[a]** providing ***screening*** or ***buffering*** between parcels and **[b]** providing ***consistency*** between any existing single-family subdivisions and the proposal.

PMC 18.260.140.F (emphasis added). Because this is a required finding for PRD approval under the Poulsbo Municipal Code, the Planning Commission (not just the Examiner) also must determine if this criterion has been met. If it has not, then the Commission must recommend denial.

As can be seen above, the compatibility requirement of PMC 18.260.140.F has two essential parts. The first is that, in relation to other surrounding land uses, the proposal must provide "screening or buffering between parcels." The second is that the project proponent must "provid[e] consistency" between the PRD and other surrounding single-family subdivisions. The code does not define the term "consistency," but common dictionary definitions emphasize that *consistency* generally refers a quality of *regularity*, *uniformity*, and *harmony* between two things[1]—here, between the proposed PRD and existing single-family subdivisions where the proposal is to be located.

These two components of compatibility are addressed, respectively, at PMC 18.260.070.A and .B. The latter—the screening and buffering component of compatibility—is addressed at PMC 18.160.070.B (quoted below), which requires adequate screening between a proposed PRD and its surrounding single-family residential zone, to be provided, *inter alia*, by a sight-obscuring fence, minimum twenty-foot vegetated buffer, or other appropriate screening measures:

> When a PRD is proposed adjacent to a single-family residential zone (developed or un/underdeveloped), the perimeter of the PRD shall be subject to screening provisions (this is in addition to subsection A of this section as applicable). The Examiner may require the PRD to make such provisions as providing a six-foot sight-obscuring fence or a minimum

[1] *See, e.g.,* Webster's Third New International Dictionary at 484 (2002) (defining "consistent" to mean "marked by harmony, regularity, or steady continuity throughout; showing no significant change, unevenness, or contradiction"; "marked by agreement and concord"; and "coexisting and showing no noteworthy opposing conflicting, inharmonious, or contradictory qualities or trends"). See also Merriam-Webster's Online Dictionary (defining "consistent" to mean "continuing to happen or develop in the same way"), available at *https://www.merriam-webster.com/dictionary/consistent*.

> twenty-five-foot vegetated buffer (designated as an open space tract), or other provisions as deemed appropriate to provide adequate screening.

The screening requirements above from PMC 18.160.070.B are addressed at pages 26 to 27 of the City's November 6, 2026, Staff Report. The Lockharts do not contest that they are satisfied here. Thus, they do not object to a finding that the Pinnacle PRD—as currently proposed—complies with the screening and buffering component of compatibility as required by PMC 18.260.140.F.

The Lockharts do, however, object to any finding that the proposed Pinnacle PRD complies with the consistency component of compatibility at PMC 18.260.140.F, which is addressed separately at PMC 18.260.070.A. That code section provides:

> 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 Examiner 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.

PMC 18.260.070.A (emphasis added). As can be seen from the quote above, when this provision is triggered:

- The first sentence establishes what a proposed PRD must be designed and developed to be consistent with—namely, the existing single-family development adjacent to the PRD. The two developments (existing and proposed) must be "consistent."

- The second sentence establishes the means by which that consistency standard might be achieved—namely, through matching lot sizes, lot widths, or requiring similar height and scale of proposed structures.

The use of "may" in the second sentence confers discretion as to the means of achieving consistency, but consistency itself remains a strict requirement, as acknowledged by the Staff Report and the City's prior code interpretations. In turn, the particular means of achieving consistency mentioned in this rule (*i.e.,* matching lot sizes, lot widths, or house height and scale) also emphasize what is meant by the word "consistency"—namely, as above, that it generally refers to a quality of uniformity or regularity between the two developments. Hence the focus on "matching."

Here, there is a stark lack of consistency between the proposed PRD and the adjacent Crystal View subdivision, where the Lockharts reside. This can be seen generally along the common boundaries where the two subdivisions meet—i.e., along the western boundary of the Crystal View subdivision adjacent to lots 50 to 63 of the Pinnacle PRD; and along the southern boundary of the

Crystal View subdivision, adjacent to lots 36 to 43 of the Pinnacle PRD. These two areas are shown below, as excerpted from Sheet PP-01 of the Pinnacle Overall Site Plan and Phasing Plan (Exhibit 2.b, dated September 16, 2026). In these areas, the Pinnacle lots (shaded in red) are significantly smaller than the adjacent Crystal View lots (shaded in green)—the Pinnacle lots are all approximately half the size of the Crystal View lots. There is simply no regularity, uniformity, or consistency between the two subdivisions in these areas. They represent dramatically different densities and lot sizes.



In the Staff Report, City administrative staff argue that the Pinnacle PRD has, in fact, been designed to be consistent with the Crystal View subdivision. But that analysis simply is not credible and ignores the plain language of the Poulsbo Municipal Code.

First, the Staff Report states that the two developments (Pinnacle and Crystal View) are "consistent" because "[t]he proposal consists entirely of detached single-family dwellings, maintaining the predominant residential housing form found in the adjoining neighborhoods." Staff Report at 25. But that is entirely irrelevant. The consistency requirement at PMC 18.260.070.A only applies when a Planned *Residential* Development ("PRD") is proposed adjacent to an "existing *single-family residential zone* which has been developed utilizing traditional city subdivision development standards and lot sizes." In other words, the whole point of the consistency requirement is to ensure that two residential developments are consistent with each other. Thus, the fact that they are both "residential" in character is a given. It is not a factor that supports, or contradicts, consistency.

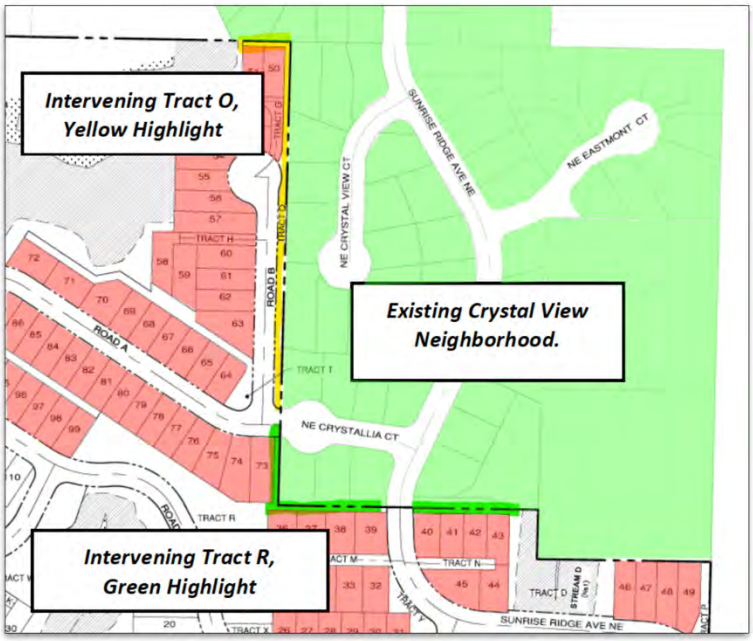
Second, the Staff Report states that the Pinnacle PRD site design "avoids, in substantial portions of the applicable perimeter, an immediate lot-to-lot transition between smaller PRD lots and the larger existing subdivision lots by incorporating ***intervening tracts and physical separation***," and that "[r]etained vegetation, open-space areas, landscaping, and other site-design elements further contribute to the transition between development patterns." Staff Report at 25 (emphasis added). Here, the City bases its consistency determination essentially on screening and buffering between the two subdivisions. But as discussed above, screening and buffering is a separate element of compatibility under PMC 18.260.140.F. It is addressed specifically at PMC 18.260.070.B and is required "in addition to" the consistency requirement at PMC 18.260.070.A. Screening and

buffering, therefore, does not equate to consistency. Nor may consistency be achieved simply through screening and buffering. The two are separate requirements under PMC 18.260.070.A and B. They are separate components of compatibility under PMC 18.260.140.F.

Third, the Staff Report notes that "[t]he existing neighborhood incorporates a terraced development pattern, with homes situated at varying elevations to accommodate the natural grade," and as such, "the use of terraced building sites and varying elevations [within the proposed Pinnacle PRD] is consistent with characteristics already present in the surrounding single-family residential environment." Staff Report at 26. But this says little more than both subdivisions would be built on a hill. They may be similar in that regard due to their location. But this does not support site design "consistency" in any of the ways mentioned at PMC 18.260.070.A.

Fourth, the Staff Report notes that housing in the Pinnacle PRD (like those in Crystal View) would be subject to height limitations in the Poulsbo Municipal Code. *See* Staff Report 25 (noting that "[p]roposed structures remain subject to the applicable RL building-height requirements"). That may address one aspect of consistency—relative height of proposed buildings—but it is not sufficient to support a finding of overall consistency as required by PMC 18.260.070.A and the compatibility requirement of PMC 18.260.140.F.

Overall, the City notes that "consistency" involves many factors, including, *inter alia*, overall physical and visual character, housing type and orientation, lot configuration and spacing, building scale and massing, and the relationship of structures to adjacent properties. Staff Report 25. With this, we do not disagree. Consistency certainly requires a multi-factored determination. But here, what the City overlooks is that the most obvious and glaring lack of consistency between the two subdivisions (Pinnacle and Crystal View) is parcel size. Parcel size is precisely what breaks the consistency between the two subdivisions, and it does so in an obvious and dramatic way, as can be seen in the diagram on page 26 of the Staff Report (excerpted below). The two subdivisions are radically different, and they are radically different in the very first way referenced at PMC 18.260.070.A—the lot sizes are dramatically different.



It does not take an expert to recognize the stark lack of consistency between the proposed Pinnacle PRD and the existing Crystel View subdivision. And although the Staff Report notes that consistency has many factors, it cannot be disputed that when the Poulsbo City Council adopted the consistency requirement at PMC 18.260.070.A, that code section was drafted specifically with a focus on consistency between lot sizes and dimensions. Matching lot sizes and dimensions may be a subset of conditions authorized by PMC 18.260.070.A for achieving consistency, as the Staff Report observes. But there can be little doubt that those were the most important considerations when this code section was adopted, as evidenced by the Council's express reference to them in the plain language of the rule. It is likely for this reason that consistency between proposed and existing lot sizes (either in absolute square footage, or linear feet along the project boundary) has consistently been a prime consideration in prior City PRD staff reports, such as in the staff reports for the Calavista PRD (Planning File P-05-8-19-01), the Cedar View at Glenwood PRD (Planning File P-11-04-25-02), and the Noll Pointe PRD (Planning File P-09-10-25-01). The City's Staff Report for the Pinnacle PRD breaks markedly with that pattern of practice by effectively ignoring the lot size issue altogether, conflicting with the public's interest in consistent and predictable application of the code.

Thus, we would request that the Planning Commission either (a) recommend denial of the proposed Pinnacle PRD due to a lack of consistency within the meaning of PMC 18.260.070.A, or (b) impose a condition requiring Pinnacle Lots 50 through 64, 73, 36 through 39, and 40 through 43 (i.e., the perimeter lots as shown at Sheet PP-01 of Staff Report Exhibit 2.b) to be increased to a size more consistent with the adjacent lots in Crystal View. Consistency may be multi-factored. But that does not mean lot size can be ignored, as it is obviously within the central focus of the rule. The rule also requires consistency, not "partial consistency."

Last, the Staff Report discusses three prior code interpretations issued this year on PMC 18.260.070.A, identified as Staff Report Exhibits 14.a, 14.b, and 14.c. Nothing in this comment letter conflicts with the first two cited code interpretations (Exhibits 14.a and 14.b). The third code interpretation, however, attempts to limit the scope of PMC 18.260.070.A by requiring consistency "at the adjacent perimeter" of a proposed PRD—a limitation found nowhere in the plain language of the code itself. The Commission should be aware that the Lockharts have appealed the City's third code interpretation referenced in the Staff Report to the Hearing Examiner, and the Examiner is currently considering whether to consolidate the Pinnacle PRD hearing with the Lockharts' appeal hearing. To the extent the Staff Report relies on that code interpretation, it conflicts with the plain language of the code and is likely to be reversed on appeal. PMC 18.260.070.A plainly requires a proposed PRD to be consistent with the single-family development located at its perimeter (here, the Crystal View subdivision), with special emphasis on consistency between lot sizes, lot widths, and the size and scale of proposed structures. The requirement is not merely for the so-called "perimeter" of a proposed PRD to establish such consistency—a much narrower requirement that would conflict significantly with the City's past practice and the plain language of the Poulsbo Municipal Code—specifically, PMC 18.260.070.A and PMC 18.260.140.F.

B. The design of Sunrise Ridge Ave NE is inconsistent with established development standards, and fails to assure the safety of—and safe access to—the neighborhood, and so the Examiner cannot make the mandatory findings required by PMC 18.260.140.I, J, or L.

The next set of issues in this letter concern the proposal's design for Sunrise Ridge Avenue NE between NE Crystallia Court and NE Johnson Parkway NE. Mark Haines, a professional traffic engineer with V-Naught Traffic Solutions, LLC, in Portland, Oregon, analyzed the Applicant's design of Sunrise Ridge and identified issues related to sight distance and roadway grade, as well as safety and noise. His complete analysis is provided in his Technical Review, attached hereto as Attachment A along with his curriculum vitae.

In brief, Mr. Haines concludes that the Applicant's Traffic Impact Analysis ("TIA") (Ex. 9.a) is deficient in failing to include a sight distance study, ignoring the effects of roadway grade, the alignment of various cross streets and driveways, and failure to assess impacts on pedestrian and bicyclist safety. These deficiencies are compounded by the fact that half of the more than 1,200 daily trips projected to come from the proposed Pinnacle PRD would rely on Sunrise Ridge, with its particularly steep grade, and would pose a significant safety risk especially during precipitation events—which are, of course, exceedingly common in this area. These risks are not limited to drivers. As noted by Mr. Haines, the steep grade alone calls for analysis regarding how Sunrise Ridge would comply with, among other things, the Americans with Disabilities Act, which is not present in the TIA.

In terms of this Commission's review of Pinnacle, what Mr. Haines' conclusions mean is that the present design of Sunrise Ridge fails to satisfy the City's adopted development standards for roadway design, and would be detrimental to the safety of those using—or walking along—that road. *See id*. The first failure precludes the Examiner from making the mandatory finding that Pinnacle is consistent with the City's established development standards. *See* PMC 18.260.140.J. The second failure precludes the Examiner from making the mandatory findings that "there will be adequate provisions for public access to serve [Pinnacle]," and (more significantly still) that approval "would not be detrimental to the public interests, health, safety or welfare of the city." PMC 18.260.140.I, L. An inability to make these mandatory findings means the Examiner cannot approve Pinnacle (*see* PMC 18.260.140), and so the Commission should not recommend approval.

C. The limited information available regarding the design of Pinnacle's retaining walls, as well as the limited analysis of that information, are insufficient to support the necessary findings for approval in PMC 18.260.140.K–L.

The final issue addressed in this comment letter is the design of the retaining wall planned for Tract Q and loss of lateral support for Crystal View lots located above the planned wall, including the Lockharts' lot. *See* Preliminary Grading Ex. 2.d at 1.

The City's Staff Report offers a reassurance that Pinnacle's retaining walls have been designed to "address conflicts with ... ownership and maintenance responsibilities." Staff Report (Ex. 1.) at 6. But Condition P54 provides the sole mention of lateral support, and merely states:

> Prior to issuance of a grading permit, the applicant shall submit final geotechnical plans and supporting documentation demonstrating compliance with all approved geotechnical recommendations. Final designs shall evaluate, at a minimum: global slope stability, wall embedment, *lateral earth pressures*, groundwater conditions, wall drainage and subdrainage, temporary excavation support, where necessary, construction sequencing, and long-term stability. All retaining walls shall be designed by licensed geotechnical and structural engineers consistent with the approved geotechnical reports.

Id. at 45 (emphasis added). But how can either offer effectual reassurance when, as with the City's truncate consistency analysis, it has offered little more than conclusory statements, and—in this instance—a promise that the lateral support issue will be addressed at a future time, in a review process that may well provide no notice and comment period where the Lockharts (and other affected Crystal View property owners) can address concerns with those final designs?

The geotechnical engineering report from Aspect (now Geosyntec Consultants), dated February 13, 2025, stated that its scope included (among other things) "analysis, conclusions, and recommendations" for "[l]ateral earth pressures for design of residential basement and exterior site retaining walls up to 8 feet in height." Ex. 6.a at 1. That report provides *some* analysis of how to manage such pressures, and notes that Pinnacle may include retaining walls with heights "up to 10 feet." *Id*. at 18. However, it does not make any reference to particular retaining walls within Pinnacle or how the broadly described methods would be applied. The addendum, completed on September 9, 2026, provides no additional analysis. Its substance is limited to stating that the planned retaining walls are "less than 12 feet in height," while acknowledging that the final walls "may be up to 20 feet in height," and concluding that retaining walls that tall are supported by its earlier analysis. Ex. 6.f at 2. This may be fine for retaining walls interior to the proposed Pinnacle PRD. But for exterior walls intended to provide lateral support for adjacent properties, much more is required to ensure those other properties will not be significantly damaged.

Since the February 13, 2025, analysis had a scope limited to retaining walls "8 feet in height," or at most "up to 10 feet," how can an addendum, which contains no additional analysis, adequately analyze retaining walls "up to 20 feet in height"? *See* Ex. 6.a at 1, 18; *see also* Ex. 6.f at 2. Plainly, it cannot.

To approve Pinnacle, the Examiner would have to make the findings that the proposal does not involve "significant unmitigated harmful effects upon environmental quality and natural resources," and that the "design of the proposal [will] not be detrimental to the public interests, health, safety or welfare of the city." PMC 18.260.140.K–L. Here, the presently available information regarding retaining walls—which to a large degree serve the purpose of protecting the

environment, people, and property from landslides—is essentially limited to the following: the Applicant is aware of methods for building them; the Applicant contends that they can be built up to 20 feet high in Pinnacle; the City concurs, and will sort the details out later.

This is simply not enough. The Examiner must make the required findings at PMC 18.260.140 in order to approve the Pinnacle PRD. That the Applicant generally knows how to build retaining walls as a general matter, and broadly asserts that retaining walls up to 20 feet in height could be built within the site, is a far cry from what must reasonably be provided for the Examine to make those findings. At a minimum, some preliminary analysis of the "global slope stability, wall embedment, lateral earth pressures, groundwater conditions, wall drainage and subdrainage, temporary excavation support, where necessary, construction sequencing, and long-term stability" described in Condition P54 must be provided for the current design, even if it is subject to revision before final project approval. Without this, the Examiner is effectively being asked to take the Applicant's word that an unknown and unidentified builder will ultimately design and construct the retaining walls correctly, and make the necessary findings on that basis. Such a decision would obviously not be made on the basis of substantial facts in the record, and thus would be subject to challenge under Washington's Land Use Petition Act ("LUPA") RCW 36.70.130(1)(c).

D. Conclusion

The City's Staff Report does not demonstrate that the current design for Pinnacle meets the approval criteria at PMC 18.260.140.F, I, J, K, and L. As such, the Examiner cannot approve the proposed Pinnacle PRD and the Commission should not recommend approval. The Commission should instead recommend denial, or approval with conditions adequate to address the concerns above.

Respectfully submitted,

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By: _____

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cc: Clients

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ATTACHMENT A

Haines Report and CV

Technical Review

Pinnacle at Liberty Bay Development

Poulsbo, Washington

Prepared by
Mark Haines, P.E., PTOE
Traffic Engineer

October 26th, 2026

V-Naught Traffic Solutions, LLC
Planning | Operations | Design | Engineering

Executive Summary

This report presents a technical review of the proposed development site for Pinnacle at Liberty Bay in Poulsbo Washington. The Traffic Impact Analysis - Version #5/October 2026 (TIA) is being reviewed by the City of Poulsbo and Parametrix, therefore this review focuses on the proposed layout of Sunrise Ridge Ave NE connection between NE Crystallia Ct and NE Johnson Pkwy NE.

The review focuses on three transportation topics that are central to the proposed project:

- Sight Distances
- Roadway Grade
- Safety and Noise

While the TIA describes the Level of Service (LOS) and travel demand changes based on the proposed development, it does not effectively describe the impacts to roadway users and local residents from the new connection along Sunrise Ridge Ave NE. The following report describes the substantive deficiencies in the available traffic impact analysis.

Stopping Sight Distance

The proposed layout for Sunrise Ridge Ave NE follows the existing maintenance access road in the same location (figure 1). The new layout would increase the width of the roadway to the extent possible within the right of way (ROW) including a single vehicle lane in each direction and sidewalks on either side of the street. There are roadways connected to the proposed layout of Sunrise Ridge Ave NE to provide access to homes within the development. Additionally, residential plots are proposed having direct access to Sunrise Ridge Ave NE.

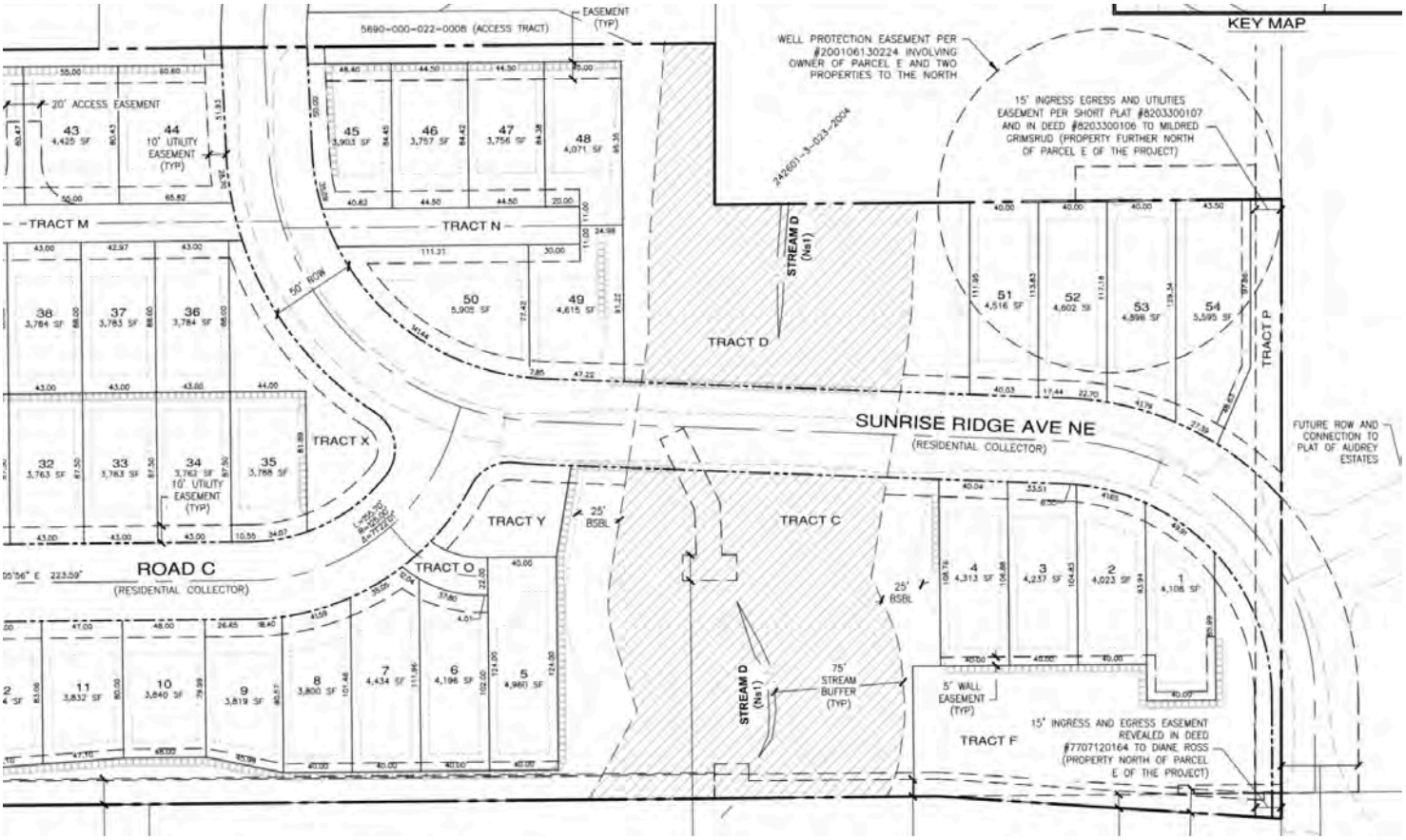

Figure 1: Proposed Layout for Sunrise Ridge Ave NE

According to the City of Poulsbo Street Standards - Section 2, all intersections shall be designed with adequate sight distance in accordance with AASHTO standards. The analysis available for this development did not include a stopping sight distance study for the drivers approaching Sunrise Ridge Ave NE. The analysis of sight distance for each approach to the proposed layout of the roadway is crucial in defining risks associated with each approach and any appropriate mitigation of those risks.

There are at least two specific locations where stopping sight distance (SSD) should be analyzed and documented. First is the location of a vehicle approaching Tract N from the south. The second is a driver approaching the driveway of proposed plots 1 through 4 from the south.

The industry accepted standard for calculating SSD is through the use of the Policy on Geometric Design of Highways and Streets (otherwise known as the "Green Book") developed by the American Association of State Highway and Transportation Officials (AASHTO). The green book provides a formula (figure 2) that describes two of the major pieces of stopping sight distance:

1) Brake Reaction Time

2) Braking Distance

$$SSD = 1.47Vt + \frac{V^2}{30\left[\frac{a}{32.2} \pm \frac{G}{100}\right]} = 3.675V + \frac{V^2}{30(0.34782 \pm \frac{G}{100})}$$

Figure 2: AASHTO Stopping Sight Distance Formula

The formula above requires information about the design speed (V) and the grade (G) of the approach. Generally, this is an accepted method for describing SSD for light vehicles such as passenger vehicles and light trucks, but does not take into account heavier delivery type trucks as it relates to braking power and roadway grade. According to the City of Poulsbo Street Standards - Section 2, streets shall be designed for a speed limit of 25 miles per hour. The proposed maximum grade of Sunrise Ridge Ave NE is 12%. The SSD for a level roadway at a 25mph design speed is 155 feet. Due to the upgrade slope of the roadway approaching Tract N, the required SSD according to AASHTO drops to approximately 136 feet.



Figure 3: Stopping Sight Distance view from Sunrise Ridge Ave NE to Tract N

Due to the nature of the topology in the area and the steepness and curvature of the roadway, the sight distance may be obstructed within the 135 feet stopping sight distance (figure 3). Additionally, drivers leaving Tract N may not have sufficient time to make a maneuver onto Sunrise Ridge Ave NE.

In addition to the approach nearing Tract N, the SSD for the driveways near the intersection of Sunrise Ridge Ave NE and Johnson Pkwy NE will be limited by the topology of the surrounding area. Therefore, the approach to the driveways serving plots 1-4 may not meet the required sight distance to maintain safe access and should be analyzed and documented (figure 4). Additionally, the sight distance for drivers completing backing maneuvers from the driveways of plots 1-4 will be further limited. As a result, they will have the potential to create additional conflicts with people walking, biking, or driving along Sunrise Ridge Ave NE. Driveway maneuvers for the driveways directly connected to the roadway should be analyzed and documented.



Figure 4: Stopping Sight Distance view from Sunrise Ridge Ave NE to Johnson Pkwy NE

Decision Sight Distance

AASHTO describes Decision Sight Distance (DSD) as the distance needed for a driver to detect an unexpected or otherwise difficult-to-perceive information source or condition in a roadway environment that may be visually cluttered, recognize the condition or its potential threat, select an appropriate speed and path, and initiate and complete complex maneuvers. In this case, DSD related to five avoidance maneuvers A-E. For this proposal, avoidance maneuvers D or E are most correlated with the design context and are described as speed/path/direction change on suburban road or street providing guidance on reaction time(s) *t*.

The table listing DSD for speeds at 5mph intervals in the AASHTO green book provides DSD for a design speed as low as 30mph. In this case, the design speed is assumed to be 25mph or lower. Therefore, the required DSD was calculated using the formula provided in the AASHTO green book (figure 4).

$$DSD = 1.47Vt + 1.075\frac{V^2}{a}$$

Figure 4: AASHTO Decision Sight Distance Formula

The DSD for the proposed roadway layout is shown below in table 1 for design speeds of 20 and 25mph. The calculated distances are further than a driver along Sunrise Ridge Ave NE can reasonably see, and react to, drivers approaching from various approaches and should be analyzed as part of the development proposal.

Design Speed (mph)	Decision Stopping Distances (ft)	
	Maneuver D	Maneuver E
20	406	457
25	519	584

Table 1: Decision Sight Distance

Intersection Sight Distance

Intersection Sight Distance (ISD) describes the unobstructed view of the entire intersection for approaching drivers. It appears that the ISD, as with the DSD above, is not met for multiple approaches to Sunrise Ridge Ave NE. These conditions are not recognized or mitigated by the TIA and could lead to adverse safety impacts with the introduction of increased vehicle traffic along Sunrise Ridge Ave NE. Table 2 lists the AASHTO ISD for passenger cars turning left from a stop.

U.S. Customary			
Design Speed (mph)	Stopping Sight Distance (ft)	Intersection Sight Distance for Passenger Cars	
		Calculated (ft)	Design (ft)
15	80	165.4	170
20	115	220.5	225
25	155	275.6	280
30	200	330.8	335
35	250	385.9	390
40	305	441.0	445
45	360	496.1	500
50	425	551.3	555
55	495	606.4	610
60	570	661.5	665
65	645	716.6	720
70	730	771.8	775
75	820	826.9	830
80	910	882.0	885

Table 2: AASHTO Intersection Sight Distance - Left Turn from Stop

Tract N Approach

According to the City of Poulsbo Street Standards - Section 2, street intersections shall be laid-out so as to intersect as nearly as possible at right angles. Under no circumstances shall any street intersect with any other street at an angle of less than 60 degrees. While Tract N is proposed to intersect Sunrise Ridge Ave NE at an angle close to 90 degrees, because of the curvature of the roadway, the practical angle of approach is less than 60 degrees. In addition to the lack of sight distance described above, this approach angle reduces the visibility of drivers approaching the intersection that introduces a driver orientation hazard. Because the intersection would be placed on the inside of a horizontal curve, a driver that is preparing to turn right is forced to rotate their line of sight well beyond 90 degrees from the forward vehicle axis to scan for conflicting traffic approaching from the south along Sunrise Ridge Ave NE. Standard human factors guidelines, supported by the FHWA Highway Design Standards and NCHRP Report 600, establish that comfortable driver neck rotation is limited to 60 to 75 degrees. Requiring a driver to look back past 90 degrees is a movement that is particularly restrictive or impossible for drivers with neck mobility limitations. Additionally, at sight angles exceeding 90 degrees, a driver's line of sight can be obstructed by the vehicle's driver-side B-pillar, headrest, and door frame. Therefore, while Tract N is one example shown in this report, all approaches to, and near, Sunrise Ridge Ave NE (such as Tract O) should be analyzed for sight distances and documented as part of the development.

Roadway Grade

The City of Poulsbo Street Standards - Section 2 states that the maximum grade of all local access streets shall not exceed 12% matching AASHTO guidelines (table 3). One exception allows grades up to 15% for streets serving 9 or fewer residential units, however the TIA states that the development project will induce vehicle demand of 91 PM peak hour trips and will serve more than 9 units. Additionally, chapter 1220.02(3) of the Washington State Department of Transportation (WSDOT) Design Manual states a maximum grade of 10% at a design speed of 25 mph on an urban/suburban roadway in a rolling topography (table 4). As the steepness of the grade increases, drivers may find it increasingly difficult to maintain their speed. In these cases, mitigations should be considered, including sight distance and roadway widths. Therefore, the roadway slope should be analyzed further as part of the development proposal and may require additional roadway grading and geometry adjustments.

Type of Terrain	U.S. Customary								
	Maximum Grade (%) for Specified Design Speed (mph)								
	20	25	30	35	40	45	50	55	60
Level	9	9	9	9	9	8	7	7	6
Rolling	12	12	11	10	10	9	8	8	7
Mountainous	14	13	12	12	12	11	10	10	9

Table 3: AASHTO Green Book Maximum Grade for Collector Streets in Urban Contexts

Type of Terrain	Design Speed (mph)								
	20	25	30	35	40	45	50	55	60
Level	8	7	7	7	7	6	6	5	5
Rolling	10	10	9	8	8	7	7	6	6
Mountainous	13	12	11	10	10	9	9	8	8

Table 4: WSDOT 1220.02(3) Maximum Grades for Suburban and Urban Contexts

Pedestrian and Bicyclist Safety and Accessibility

The Poulsbo Municipal Code Title 14.06 discusses complete streets design including the desire to implement pedestrian and bicyclist infrastructure as part of new developments. Additionally, the City of Poulsbo ADA Transition Plan states that developments which create new city roads are required to meet all ADA requirements. Further, it states that the goal of the City is to provide safe, usable and accessible pedestrian facilities. And the Poulsbo Municipal Code Tile 17.80.060 note B5 states that pedestrian and bicycle connections to adjacent subdivisions or property shall be provided for all new subdivisions. Additionally, the City of Poulsbo Street Standards - Section 2 states that all sidewalks shall meet the requirements of the Americans with Disabilities Act (ADA) and shall be constructed per current WDPOT specifications and Standard Plans.

However, the ADA states that the sidewalk grade shall have a maximum running slope of 5% (1:20). The proposed development plans show sidewalks on both sides of Sunrise Ridge Ave NE with a grade that exceeds 5% for the sidewalks. Both the development plans and the TIA do not discuss how the proposed roadway layout will meet the requirements listed above, chiefly the requirements as listed under ADA. This should be analyzed and documented as part of the proposed development.

Speed and Grade

The TIA does not take into account inclement weather as part of any analysis provided. The City of Poulsbo experiences approximately 155 days of measurable precipitation per year, especially in the fall, winter, and spring seasons. During winter months, the area experiences approximately 45 days where temperatures fall below 32F and, on average, 2-3 inches of snow annually. Combined with the downward slope of the roadway and s-curve geometry, there is an increased likelihood of negative safety implications for the proposed roadway.

Noise Pollution

Chapter 4.14 of the AASHTO green book describes noise abatement elements related to roadway designs and vehicle loads. The TIA shows that the proposed layout of Sunrise Ridge Ave NE will increase traffic demand, including local deliveries to the nearby neighborhoods. The AASHTO green book describes methods to measure and describe noise levels associated with the development of new roadways. Additionally, in chapter 3.4.2.3, it describes the power required for vehicles to overcome steep grades. Combining the increase in vehicle traffic, including large delivery trucks, and the steep grade of the roadway, the TIA should have measured and described the noise pollution increase associated with the development.

Safety and Environment

While the TIA describes historical traffic crashes within the study area, it does not describe the increase in possible collisions as it relates to the increase in the shift in traffic demand due to the development proposal. Additionally, the TIA did not analyze the potential increase in traffic collisions due to the proposed layout of Sunrise Ridge Ave NE, including its grade profile and s-curve type roadway geometry.

The Federal Highway Administration (FHWA) states that more than 25% of all fatal crashes happen on horizontal curves and that the average crash rate for curves is 3 times higher than tangent segments. Combined with the steep grade profile of Sunrise Ridge Ave NE and the number of days with inclement weather, the development proposal should add a safety analysis to the TIA to include potential mitigation for roadway departure crashes.

The TIA states that vehicle demand will increase as part of the development. However, it does not recognize the significant adverse impact of a collision between the additional vehicle volumes and any vulnerable user accessing a major roadway connection available to people walking or biking . Additionally, SEPA defines this type of collision in no uncertain terms: “The severity of an impact should be weighed along with the likelihood of its occurrence. An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred.” The probability of any one individual person being harmed by a collision may not be great, but, in the case of a collision between a driver leaving the roadway and a person walking or biking, the resulting impact would be severe and would likely result in an incapacitating injury or fatality. Depending on the driver training, the weather, and the condition of the vehicle, a driver could cause incapacitating injuries or death to more than one person and could cause considerable property damage to the surrounding area. The TIA did not specifically study these types of events, and due to the high safety risk, this warrants a detailed evaluation.

There were two reported pedestrian related crashes in the crash data timeline supplied by the TIA, both of which occurred along Hostmark St near the school zones. The new traffic demand pathway proposed by the development will increase traffic unrelated to the development. There will be an increase in vehicle traffic around the school zone areas with drivers using the Sunrise Ridge Ave NE connection. The development proposal does not adequately describe any mitigations outside of the immediate development area to account for the increase in vehicle demand in the area.

Conclusion

The Traffic Impact Analysis concludes that there were no safety deficiencies identified as part of the proposed residential development. After reviewing the analyses, assumptions, and supporting documentation presented in the TIA, and as part of the proposed development street layout, this technical peer review concludes that several of those conclusions are not adequately supported by the evidence contained within the study.

The TIA fails to include sight distance studies as part of the development proposal. This is a major oversight of any potential safety implications related to the design of Sunrise Ridge Ave NE. The proposed layout of the residential development contradicts the Street Standards of the City of Poulsbo in many instances including sight distances, and roadway intersection angles.

The study projects the addition of 1,254 average weekday trips with approximately half of those trips using the proposed Sunrise Ridge Ave NE connection. The addition of vehicle trips combined with the additional access to local access roadways and driveways increases the potential for safety implications related to vehicle movements, especially considering the low sight distances in the area.

The proposed development describes the street design in terms of the horizontal layout while ignoring the implications of the steep vertical grade along Sunrise Ridge Ave NE. In both the uphill and downhill approaches, drivers will need to negotiate speed while also negotiating the horizontal curves while also staying aware of drivers accessing driveways and other local roadways without adequate sight distance. The steep grade can lead drivers to lose control of their vehicles downhill, especially during inclement weather events. While the uphill grade increases the required power of vehicles to overcome the grade, which leads to increased noise pollution in the area not described by the TIA.

Additionally, the TIA and development proposal ignored the vertical grade of Sunrise Ridge Ave NE as it relates to providing safe and accessible pedestrian infrastructure that meets critical requirements from the City of Poulsbo, WSDOT, and the Americans with Disabilities Act.

This review finds that the combination of the addition of vehicle trips, vulnerable user trips, the steep grade of Sunrise Ridge Ave NE (and other proposed local streets), and the lack of adequate sight distances will lead to significant adverse impacts to the safety and liveability of the area residents.

Mark Haines, PE, PTOE

Education
- **BS, Civil Engineering**
  Portland State University
  (2013)

Registrations
Professional Engineer
- OR #85152PE

Professional Traffic Operations Engineer
- #5517

Organizations
- **Oregon Section Social Chair** (2019-2021)
- **Oregon Section Past President** (2018- 2019)
- **Oregon Section President** (2017-2018)
- **Oregon Section Vice President** (2016-2017)
- **Oregon Section Secretary/Treasurer** (2015-2016)
- **PSU Student Chapter** (2009-2013)

Awards & Recognitions
- **ITE Western District - Outstanding Technical Paper Award** (2023)
- **ITE International Transportation Achievement Award - TSMO** (2023)
- **ITE Oregon Section Transportation Project of the Year Award** (2022)



Mark Haines is a Principal Engineer with V-Naught Traffic Solutions, LLC. He has a wide array of expertise in traffic related studies, design and construction practices, and operations. Mark specializes in reviewing traffic related studies. Additionally, he works with a talented team of engineers to drive innovation of traffic signal systems focused on people movement whether by foot, bike, or transit. Mark has experience as a traffic engineering consultant and a public employee providing unique solutions to complex challenges using limited resources. He earned his Bachelor of Science in Civil Engineering from Portland State University. Mark is a registered professional engineer and professional traffic operations engineer.

PROFESSIONAL EXPERIENCE

Mark has been one of the principal engineers at V-Naught Traffic Solutions since 2016. He has been the lead engineer involved in reviewing parking and sight distance studies, providing traffic control plans for major construction and special events, and developing parking studies for development projects. Mark specializes in using local and national traffic engineering policies and practices to perform his work including the Manual on Uniform Traffic Control Devices, Highway Capacity Manual, AASHTO Green Book, ITE Trip Generation Manual, and Parking Generation Manual.

Mark began his career in Civil Engineering as a volunteer in the Traffic Signals, Street Lighting and ITS group at the City of Portland while attending college. He has worked in every traffic group at PBOT, engaging in work ranging from installing single stop signs to creating and deploying full temporary traffic control plans for the Portland Marathon to developing civil, signing, striping, and signal plans for the Better Naito Forever project and designing and implementing the first cloud-based Transit Signal Priority system within the City of Portland. Mark now helps guide other engineers through his role as the subject matter expert in his role as ITS Engineer II. He works as a project manager for highly technical projects and as a regional resource for traffic signal operations.

Institute of Transportation Engineers (ITE)

Mark has been involved with ITE for over 15 years. He started during his tenure at Portland State University. He dedicated his time to the four-year rotation leading the Oregon ITE Board. During that time, he was deeply involved in running the Section and planning events including 2018 ITE QUAD Conference, 2022 International Conference, and the annual Oregon ITE Bill Kloos Traffic Bowl. Mark developed a robust student outreach program including a new funding model for student activities specifically developing under-represented students.

Mark Haines, PE, PTOE

Selected Projects

Parking Studies – Oregon

Mark managed the review of parking demand and generation for several residential developments in the Portland Oregon region, including the N Salem St, NE Ainsworth St, and NE 7th Ave parking studies. Using the latest tools and practices, Mark provided data on the existing parking supply, classification, demand, and occupancy. The projects utilized the parking generation manual and local policies to provide a basis for sound decision making around the potential parking demand after the completion of each residential development. Overall, the parking demand for each development was clearly identified and successfully mitigated by each development.

Traffic Studies – Oregon and Washington

Mark reviewed several traffic studies created by local consultant firms describing the traffic impacts of major developments, including the Athy Creek Middle School relocation in West Linn, OR and the new gas station in Vancouver, WA. Mark was in charge of reviewing the traffic impact studies, and associated traffic demand models, to provide comments and critiques for the projects. Publications such as the Highway Capacity Manual, ITE Trip Generation Manual, and the Manual on Uniform Traffic Control Devices, in concert with local policies, provided the basis of the analysis. Mark provided technical memos that described the inadequacies of the traffic demand models and traffic impact assumptions. Overall, the traffic impacts required additional study resulting in additional traffic impact mitigation by each development.

Sight Distance Studies - Oregon

Mark has been the lead engineer developing sight distance studies for several clients in the State of Oregon including near SE 142nd Ave in Clackamas and SW 180th Ave in Beaverton. The studies include using the local policies around speed limits and development access locations as well as the American Association of State Highway and Transportation Officials (AASHTO): Policy on Geometric Design of Highways and Streets (Green Book) to find and report on the appropriate sight distance requirements for the development access points.

Outlook

Public Comment & Technical Supplement for Nov. 17 Planning Commission Meeting & Dec. 3 Hearing: Pinnacle at Liberty Bay (P-06-20-25-03)

From Andrew Hitchings <andyhitchings@gmail.com>
Date Tue 11/17/2026 12:54 PM
To City of Poulsbo Planning and Economic Development <information@cityofpoulsbo.com>

SUBJECT: TECHNICAL SUPPLEMENT AND EVIDENTIARY SUBMISSION: FAILURE OF FIRE CODE ACCESS REMOTENESS, UNMITIGATED WUI HAZARDS, AND MANDATORY CONSTRUCTION OF BAYWATCH COURT NE CONNECTION PRIOR TO ANY FINAL PLAT APPROVAL

1. EXECUTIVE SUMMARY

This technical supplement formally submits into the administrative evidentiary record critical code interpretations, geometrical analysis, and civil engineering evaluations regarding the proposed 130-lot Pinnacle at Liberty Bay Preliminary Plat and PRD (Permit No. P-06-20-25-03).

Following the release of the official **Planning Commission Staff Report (dated November 6, 2026)**, the SEPA MDNS, and companion Engineering and Planning SEPA Memoranda, the City of Poulsbo has officially established that reliance on the single Sunrise Ridge Avenue NE corridor fails City standards and International Fire Code requirements. City Staff officially recommend approval **only subject to conditions**, explicitly mandating the **Baywatch Court NE street connection (NR-12)** under Conditions of Approval **P12, E52, and SEPA Conditions S50 & S55**.

Specifically, **Engineering Condition E52** and **SEPA Condition S50** dictate that the public street connection to **Baywatch Court NE** must be constructed and accepted by the City **with the first division of the subdivision**, prior to final plat approval for any phase dependent upon additional access.

Based on the official administrative record, we respectfully request that the Hearing Examiner uphold the City's mandatory access conditions without modification:

- **Enforce Mandatory Baywatch Connection Prior to Any Development (COA E52 & SEPA S50):** Require the applicant to construct and complete a code-compliant clear-span bridge to **Baywatch Court NE (NR-12)** prior to final plat approval for Phase 1 or any subsequent phase. Per **COA E10 and SEPA Condition S54**, no final plat division may proceed without independent infrastructure and complete secondary access. This requirement is economically and technically feasible by eliminating non-compliant eastern structural fill and 20-to-35-foot retaining walls along NE Crystallia Court to fund the western clear-span bridge.

2. FIRE CODE GEOMETRY & GEOMETRIC FAILURE OF REMOTENESS

Under **IFC Appendix D107.1**, developments exceeding 30 single-family dwelling units require two independent and approved fire apparatus access roads. **IFC Appendix D107.2** dictates that where two access roads are required, they must be placed a distance apart equal to not less than **one-half the length of the maximum overall diagonal dimension** of the property or area served, measured in a continuous straight line between accesses.

A. Baseline Measurement Errors & Staff Concurrence

- **Primary Entrance / Bottleneck:** Primary access enters via **NE Sunrise Ridge Avenue (Road A)**. Based on the site's overall diagonal dimension, mandatory 1/2-diagonal separation under IFC Appendix D107.2 requires a secondary exit located approximately **940 to 960 feet** away at the **Baywatch Court NE ROW stub** on the western boundary.
- **The Eastern Pseudo-Loop:** The applicant's proposed secondary connection ties into **NE Crystallia Court** via internal Road B. Traffic exiting via NE Crystallia Court travels merely ~300–350 feet before dumping directly back into **Road A at NE Sunrise Ridge Avenue**—a single 360-foot bottleneck stem through which 100% of project traffic must pass.
- **Confirmation by Fire Code Official & City Staff:** The Planning Commission Staff Report explicitly confirms that the Fire Code Official evaluated the proposed layout and determined that *"the access points shown on the preliminary subdivision do not satisfy the remoteness requirement of IFC D107.2"* and that a connection to Baywatch is required (Staff Report, p. 18).

3. HYBRID EGRESS RISKS IN A WUI HAZARD ZONE

The subject site is encapsulated on three sides by heavy old-growth conifer forest, presenting significant Wildland-Urban Interface (WUI) fuel loads.

1. **Inclusion of Legacy Structures in Evacuation Scope:** Channeling evacuation through **NE Crystallia Court** forces new households to evacuate past existing, un-sprinkled legacy homes.
2. **Radiant Heat & Conifer Crown Fire Hazards:** In a wildfire scenario, radiant heat, fallen timber, or structure fires in the un-sprinkled legacy zone along NE Crystallia Court easily render the narrow roadway impassable.
3. **Ineffectiveness of NFPA 13D Sprinklers for Exterior Egress:** While the applicant highlights 100% NFPA 13D interior residential sprinklers, interior sprinklers do not prevent forest embers or off-site structure fires from blocking vehicular evacuation along the single 360-foot access neck on **NE Sunrise Ridge Avenue**. This reinforces **SEPA Condition S55** and Staff Report findings regarding the operational necessity of an independent secondary route during emergency obstructions (Staff Report, p. 18).

4. CIVIL ENGINEERING RE-ALIGNMENT & COST-OFFSET MECHANICS

In their submittal dated September 16, 2026, ESM Consulting Engineers claimed that a western crossing over Stream C to Baywatch Court NE is "technically infeasible". Independent review by Parametrix and City Staff has formally debunked this claim (Staff Report, p. 6, 12, 18).

A. Culvert Selection vs. Clear-Span Bridge at Stream C

- The applicant's "infeasibility" argument relies on a low-profile bottomless arch culvert that sits deep within the stream channel, creating vertical grade conflicts for fire apparatus and stream buffer encroachment.
- A standard **clear-span bridge** anchors high on the ravine banks, completely spanning Stream C without touching the active channel, eliminating grade conflicts, and protecting stream buffers as required by **COA P51 and SEPA Condition S17**.

B. Capital Cost-Offset: Eliminating Crystallia Retaining Walls

The applicant's proposed layout allocates massive capital to force the eastern connection at **NE Crystallia Court**, requiring:

- **15 to 30 feet of structural imported fill** to elevate internal road grades.
- **20 to 35-foot structural retaining walls** along steep slopes adjacent to Parcels 3-018 and 3-023.
- City Engineering notes that site soils contain up to **87% fines**, making on-site soil unsuitable for structural fill or roadway embankments without expensive import or soil amendment (Staff Report, p. 4).

C. The Feasible Engineering Solution

By **removing the non-compliant NE Crystallia Court connection**, internal roadways follow natural topography, eliminating millions of dollars in imported structural fill, retaining walls, and soil amendment oversight. **Redirecting these savings fully funds the required clear-span bridge over Stream C to Baywatch Court NE**, delivering code-compliant remote access, fulfilling **COA P12, COA E52, and SEPA Conditions S50 & S55**, and preserving overall project viability.

5. FORMAL REQUESTED ACTIONS & RELIEF

Based on the evidentiary record, Staff Report findings, and Fire Code Official determinations, we respectfully request that the Hearing Examiner issue the following orders:

1. **Enforce Strict Compliance with COA E52 & SEPA S50:** Require full compliance with COA E52 and SEPA Condition S50, mandating that the **Baywatch Court NE (NR-12)** connection be constructed, completed, and accepted by the City **prior to final plat approval of Phase 1 or any subsequent phase**.
2. **Reject Any Developer Request for Alternative Mitigation / Waivers:** Deny any request by the applicant to defer the Baywatch connection or utilize NE Crystallia Court as a temporary secondary exit, as the Fire Code Official has determined Crystallia Court fails IFC Appendix D remoteness requirements (Staff Report, p. 18).
3. **Mandate Clear-Span Bridge Civil Plans:** Direct the applicant to submit final civil construction plans for a clear-span bridge over Stream C to Baywatch Court NE (per COA P51 and SEPA Condition S17), utilizing capital cost savings from removing the eastern structural fill and retaining walls.
4. **Enforce Phase 1 Infrastructure Independence (COA E10 & SEPA S54):** Strict adherence to COA E10 and SEPA Condition S54, prohibiting any final plat approval until complete and independent access infrastructure—specifically the Baywatch Court NE bridge—is fully operational.

6. CONCLUSION

The administrative record, official Planning Commission Staff Report, and Fire Code Official determinations support only one legally defensible conclusion for the Hearing Examiner:

Uphold City Staff Conditions COA E52, COA P12, and SEPA Conditions S50 & S55 without modification. The developer must design, permit, and construct the **Baywatch Court NE** clear-span bridge (NR-12) **with the first division of the project**, and no final plat map shall be recorded or approved until this independent secondary access is operational.

Respectfully submitted,

Andrew P. Hitchings

Neighborhood Coalition Representative

INDEX OF ATTACHED EXHIBITS

- **Exhibit A:** City of Poulsbo Planning Commission Staff Report (Nikole Coleman, AICP, Nov 6, 2026).
- **Exhibit B:** City of Poulsbo SEPA Mitigated Determination of Non-Significance (MDNS) & Exhibit A Mitigation Conditions (S1–S59) (Issued Nov 2, 2026).
- **Exhibit C:** City of Poulsbo Engineering Department SEPA Memorandum (Michael Bateman, PE & Josh Ranes, PE, Oct 29, 2026).
- **Exhibit D:** City of Poulsbo Planning & Economic Development SEPA Memorandum (Nikole Coleman, AICP, Nov 2, 2026).
- **Exhibit E:** Parametrix Independent Review Memo – Connection Road Feasibility Analysis (Sept 16, 2026 / Oct 2026).
- **Exhibit F:** Applicant’s Engineering Technical Justification Letter & Access Figures (ESM Consulting Engineers, Sept 16, 2026, Job No. 2090-004-022).