EXHIBIT 9.d: Parametrix Peer Review (7/1/26)

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Technical Memorandum

DATE:	July 1, 2026
TO:	Donald Washburn, City of Poulsbo
FROM:	Tony Woody, PE, PTOE, Alex Atchison, PE, PTOE, Terry Shin, PE, PTOE, Parametrix
SUBJECT:	Traffic Impact Analysis and Transportation Review
PROJECT NUMBER:	234-2237-150 TA-05
PROJECT NAME:	The Pinnacle at Liberty Bay

This memorandum documents Parametrix's review of the applicant's Traffic Impact Analysis (TIA) for The Pinnacle at Liberty Bay development, prepared by Heath and Associates, dated April 2026, as well as other transportation information submitted in support of the proposed development. The review evaluates (1) the TIA's consistency with the City's Traffic Impact Analysis Requirements, and (2) whether the transportation information provided is sufficient to support the City's transportation review and required findings under the Poulsbo Municipal Code, Comprehensive Plan, and other applicable transportation requirements. Where additional information or analysis is identified, the comments are intended to assist the City in determining whether the proposed development adequately addresses transportation impacts and supports the required transportation findings.

Parametrix Primary Comments

1. Comment #1 – General TIA Completeness and Consistency

The revised TIA includes updates; however, deficiencies remain for completeness and consistency with the City's applicable TIA guidelines and policies. Key Issues include:

- Study Area Consistency: The report does not clearly and consistently identify all study intersections or reconcile which intersections are included in figures versus LOS tables.
- Intersection Screening: The TIA does not demonstrate that all intersections with ≥10 new trips were evaluated per City requirements. Consider intersections to the south of Johnson Road and to the north of Hostmark Street, based on AM and PM trip distribution figures.
- Peak Hour Methodology: School-related peak demand and local peak hour variability are not fully documented.

Comment Summary: Additional documentation is required to demonstrate compliance with City TIA standards and HCM-based methods.

2. Comment #2 – Safe Routes to School, LOS, and Concurrency

The TIA does not adequately address school-related impacts or pedestrian safety, specifically regarding the following transportation issues:

- The intersection of Hostmark/Caldart operates at LOS F (61.9–63.2 sec delay) under 2037 AM conditions, below the City LOS standard (E). Although the LOS F is consistent between 2037 No Build and Build conditions, the vehicle delay increases under the Build scenario.

- The school route to North Kitsap High School requires a mid-block crossing of Caldart Avenue without stop control. This crossing is aligned with and supported by Comprehensive Plan Policies TR-5.1, TR-5.2, and TR 5.3.
- The transportation analysis should evaluate improvements to the existing school crossing, including installation of a Rectangular Rapid Flashing Beacon (RRFB), to address pedestrian safety and support the City's transportation findings under PMC 14.04, PMC 17.60.040(A)(e), PMC 17.80.060, and Comprehensive Plan Policies TR-1.1 and TR-1.4.

Comment Summary: The TIA does not adequately evaluate pedestrian safety or identify mitigation measures necessary to address project-related transportation impacts. Based on the information currently provided, the TIA does not adequately support the City's required findings related to concurrency (PMC 14.04) and student safety.

3. Comment #3 – Baywatch Connection Feasibility Analysis

The information provided in support of the applicant's feasibility determination does not adequately support the conclusion that the Baywatch connection is infeasible due to vertical geometry and stream crossing constraints because the feasibility evaluation does not fully address applicable City codes, policies, and reasonable design alternatives necessary for the City Engineer to determine infeasibility. The feasibility evaluation should include the following:

- Additional alternatives addressing alternative crossing locations or configurations. Only one alignment was evaluated as part of the feasibility study
- Additional analysis with design deviations considered for alternatives. The current analysis assumes a K value of 6.0 and concludes the proposed connection is infeasible. While a K = 6 vertical curve is an allowable design deviation at a stop-controlled intersection under City standards, the analysis does not evaluate other reasonable design alternatives using the City's typical vertical curve criteria (AASHTO/WSDOT standard K = 12 for crest curves and K = 26 for sag curves), nor does it clearly explain why the selected design approach represents the only feasible option.
- Expanded evaluation of the basis for concluding the connection is infeasible. The memo does currently demonstrate a standard design failure, but it does not demonstrate that all reasonable modified or mitigated designs are infeasible.
- A discussion on the Baywatch connection (NR-12) is identified as a required roadway connection under the City's Comprehensive Plan (Appendix B.4a) and is necessary to meet connectivity and redundancy requirements via codes PMC 17.80.060 and PMC 17.60.040.

Comment Summary: The information provided is insufficient for the City Engineer to make a determination of infeasibility under PMC 17.80.060. Additional analysis and evaluation of alternatives and allowable deviations for the Baywatch connection is requested to determine all possible scenarios under the applicable city codes and policies. The Baywatch connection (NR-12) is identified as a required roadway in the City's Comprehensive Plan and is necessary to support connectivity and redundancy objectives.

4. Comment #4 – Access and Connectivity Without Baywatch Connection

If, after further analysis, the Baywatch connection is determined by the City Engineer to be infeasible, the information provided does not demonstrate that the proposed Sunrise Ridge access configuration satisfies the applicable City and Fire Code requirements for access, connectivity and

emergency response. Specific examples where the site plan of the TIA deviates from City or Fire Code include:

- Both Road C and Crystallia Court rely exclusively on Sunrise Ridge Ave NE, resulting in one functional access route and a single route condition, not two independent routes as required by City code and implied in the TIA. This is inconsistent with City code PMC 17.80.050(C).
- The TIA does not demonstrate that the proposed street network satisfies the redundancy objectives as required under City code PMC 17.80.060.
- The information provided does not demonstrate that the proposed subdivision provides the required street connections to adjacent properties and does not demonstrate feasibility or request exemption as required under PMC 17.80.060(B).
- Any blockage of Sunrise Ridge would significantly reduce site access, which is inconsistent with the intent of PMC 17.80.050(C) to provide access via two different streets and PMC 17.80.060 to provide redundant and efficient connections and emergency access provisions of IFC 503.1.2. This risk is amplified by steep grades (~12%) and significant elevation change.
- No alternative mitigation (e.g., emergency access, sprinklering, roadway improvements) has been proposed in the TIA as required under PMC 17.80.050(C) and supporting provisions.
- Based on the site conditions, including terrain, steep grades (~12%), and access limitations, the transportation information provided does not adequately demonstrate that the proposed access configuration satisfies the applicable emergency access provisions of IFC 503.1.2 and IFC D107.2.
- Road D exceeds allowable dead-end length and the initial project phase (>30 lots) is served by a single route, which is inconsistent with subdivision access and phasing requirements per City code PMC 17.80.050(C) and Fire code IFC D107.1.
- Each division must meet access and safety requirements independently per PMC 17.60.040(C), which is not demonstrated.

Comment Summary: Based on the information provided, the proposed access configuration does not demonstrate compliance with the City's requirements for independent access routes, roadway redundancy, and emergency access, resulting in potential life safety concerns that should be addressed through additional analysis or documentation. Accordingly, the information provided does not demonstrate consistency with the applicable City and Fire Code access provisions.