EXHIBIT 9.e: Parametrix Peer Review (9/2/26)

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Technical Memorandum

DATE:	September 2, 2026
TO:	Donald Washburn, City of Poulsbo
FROM:	Tony Woody, PE, PTOE, Alex Atchinson, 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 Traffic Impact Analysis (TIA) Resubmittal #5 for The Pinnacle at Liberty Bay development, prepared by Heath and Associates, submitted by the applicant to the City of Poulsbo on July 20, 2026. TIA Resubmittal #5 includes

This review (1) evaluates the resubmitted TIA's revisions and responses to comments provided to the applicant by the City of Poulsbo and Parametrix on July 1, 2026, and (2) summarizes the applicants responses to other transportation requirements related to Poulsbo Municipal Code compliance and access feasibility. Parametrix responses to the applicant's response and recommendations are provided in blue text within the memo.

Parametrix Primary Comments

Comment #1 – General TIA Completeness and Consistency

Comment #1A. 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.

Applicant Response. Descriptions of existing peak hour volumes (Section 4.4) have been expanded for clarity and consistency. Tables and figures have been updated to identify all seven study intersections.

Parametrix Finding. Comment addressed. The revised TIA includes figures that consistently present the study intersections for existing conditions, project trip generation and distribution, pipeline project trips, and future conditions without and with the proposed project.

Comment #1B. 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.

Applicant Response. The TIA study area was approved by City staff via email on June 10, 2025. Minor scoping revisions provided by City staff at that time were incorporated to the TIA and are reflected in the report.

Parametrix Finding. Comment not addressed. The revised TIA (version 4) remains unchanged and does not include all study intersections that would be affected by more than 10 AM or PM peak hour project-generated trips. Per email communication with the City of Poulsbo on June 12, 2025, the City directs the applicant to consider any intersections that could

generate public input that are near the 10 trip threshold as they will need to be addressed during permit approval.

The applicant's response to this comment includes figures depicting an expanded network of 8 intersections on SR 305 and on NE Hostmark St to the northwest of the proposed project site that would be affected by more than 10 PM peak hour project-generated trips. These figures do not include intersections on SR 305 to the south of the project.

The applicant's response presents the project-generated trips as a percentage share of the 2023 PM peak hour intersection entering volumes (referenced from the Poulsbo Transportation Plan Update (January 2025) at the 8 intersections. The applicant suggests that project-generated trips would increase the vehicle demand by one percent or less, resulting in virtually no change to the results reported in the Poulsbo Transportation Plan Update, and therefore does not recommend revising the TIA study area.

Because the applicant has identified 8 additional study intersections that would be affected by more than 10 AM or PM peak hour project-generated trips, these locations should be addressed in the TIA.

Comment #1C. Peak Hour Methodology: School-related peak demand and local peak hour variability are not fully documented.

Applicant Response. Traffic counts and the associated operational analysis applied Peak Hour Factor (PHF), which reflects the impacts of observed 15-minute volume peaking during each peak hour. The use of PHF allows the operational analysis to capture the impacts of short-duration school-related peaking, particularly during the AM peak hour. Existing PHFs are documented in the traffic count sheets. Peak hour variability at each study intersection is documented in Table 3.

Parametrix Finding. Comment not addressed. The revised TIA (version 4) remains unchanged and does not include discussion of the afternoon school peak analysis. Per email communication with the City of Poulsbo on June 12, 2025, the City directs the applicant to address school traffic, recognizing that the school peak differs from the AM and PM peaks typically analyzed.

The PM peak hour analyzed in the TIA is based on traffic counts collected between 4:00 and 6:00 p.m. on a weekday. This window does not include the typical afternoon peak of school-related traffic, which based on the North Kitsap School District schedule, indicates the middle and high school schedules conclude at 2:30 p.m.

A discussion of school-related peak traffic demand should be included in the TIA.

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

Comment #2A. 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.

Applicant Response. Long-range (2037) traffic forecasts have been updated. Previous versions included an error in compound growth calculations which resulted in an

overestimation of anticipated growth. Based on the corrected traffic volume forecasts, the Hostmark/Caldart intersection is expected to operate at LOS E during the 2037 AM peak hour before and after the addition of project trips. The minimum LOS E standard is satisfied.

Parametrix Finding. Comment not addressed. The revised TIA (version 4) does not provide justification for the corrected 2037 LOS/delay results at Hostmark/Caldart nor describes the growth rate calculation error. The intersection results presented in Table 9 do not reflect the Synchro output report in the Appendix.

The 2037 'without project' volumes presented in the revised TIA were calculated using a growth rate of approximately 3.5% for intersection entering volumes, which is the same growth rate used in the previous TIA (version 3), and results in the same LOS/delay (LOS F/61.9 sec).

Justification for the growth rate error should be described in the applicant's response, and the Hostmark/Caldart LOS/delay results shown in the Appendix should be reflected in Table 9 of the TIA.

Comment #2B. 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.

Applicant Response. Caldart Avenue currently provides marked pedestrian crossings at the Meredith Heights/Frank Raab Municipal Park driveway, at NE Odin Street, and at Hostmark Street. All of the existing marked crossings could serve pedestrian demand associated with North Kitsap High School. Please clarify the location of the midblock crossing referenced above.

Parametrix Finding. Further discussion is needed. The applicant's response identifies marked pedestrian crossings on the walking route between the project site and the middle/high schools to be sufficient.

Comment #2C. 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.

Applicant Response. The Hostmark Street & Caldart Avenue intersection provides curb ramps and marked crosswalks on all legs. Hostmark Street also includes signalized pedestrian crossings at two locations to the east of Caldart Avenue. Please clarify the location of the school crossing referenced above.

Parametrix Finding. Further discussion is needed. PMC 14.04.100(B)(3) states "intersections with adopted LOS F in the transportation element of the Poulsbo comprehensive plan may require mitigation measures which address impacts associated with adoption of the LOS F standard, but do not necessarily add capacity."

Hostmark/Caldart does not have an adopted LOS F standard documented in the Poulsbo Transportation Plan Update and is not expected to operate at LOS F per the revised TIA (version 4). Therefore, the non-capacity mitigation suggested by the City – a Rectangular

Rapid Flashing Beacon (RRFB) installed by the Pinnacle at Liberty Bay project at the marked crosswalk near the entrance to Raab Park – may not be applicable.

PMC 17.60.040(A)(e) states "A proposed preliminary subdivision may be approved only if the following findings are made by the review authority: The proposed preliminary subdivision makes adequate provisions for sidewalks and other planning features that provide safe walking conditions for students who walk to and from school." PMC 17.80.060(B)(5) states "Pedestrian and bicycle connection to adjacent subdivisions or property shall be provided as feasible and as consistent with the intent of the city's comprehensive plan's identified sidewalk and path connections."

The applicant's response identifies marked pedestrian crossings on the walking route between the project site and the middle/high schools to be sufficient.

Comment #3 – Baywatch Connection Feasibility Analysis

Comment #3. 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 strict compliance with a 12% max grade and K=6.0, but the city allows design deviations consistent with Construction Standards Section 1(C), which were not evaluated
- 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.

Applicant Response. The stream crossing feasibility study was updated to evaluate alternative alignments but concluded that there is only one available crossing (the existing stub off of Baywatch Court NE).

Micro alignment adjustments were made to the available crossing. The updated study provides a vertical curve based on Fire's maximum allowed approach angle, and the city's intersection landing requirements. Non-standard design parameters were not considered due to safety and liability concerns.

The applicant maintains that the project provides two distinct access points along Sunrise Ridge Avenue approximately 330' apart.

Parametrix Finding. Comment not addressed. The two access points identified by the applicant do not meet the intent and purpose of codes PMC 17.80.060 (to provide

redundant and efficient routes and connections and to provide superior emergency vehicle response time by providing multiple access to streets) and PMC 17.60.040 (to ensure the street system provides for the safe, orderly and efficient circulation of traffic, makes adequate provisions for fire and emergency access and protection, and makes appropriate provisions for the public health, safety, and welfare).

Comment #4 – Access and Connectivity Without Baywatch Connection

Comment #4. 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:

4A. 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).

4B. The TIA does not demonstrate that the proposed street network satisfies the redundancy objectives as required under City code PMC 17.80.060.

Applicant Response to 4A, 4B. The project proposes access to NE Crystallia Court and to Sunrise Ridge Avenue, providing two distinct public street connections to the site and satisfying access criteria defined in PMC 17.080.050(C). An internal street network will provide a contiguous connection between the two accesses, preserving full site access in the event of a blockage at either connection. The project also proposes completion of Sunrise Ridge Avenue to the south of the project, facilitating access to the site to/from the north via Caldart Avenue and to/from the south via Johnson Road.

Parametrix Finding to 4A, 4B. Comment not addressed. The two access points identified by the applicant do not meet the intent and purpose of codes PMC 17.80.060 (to provide redundant and efficient routes and connections and to provide superior emergency vehicle response time by providing multiple access to streets) and PMC 17.80.050(C) (to provide for at least two different standard routes for ingress and egress).

4C. 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).

Applicant Response to 4C. Feasibility studies for connections to the adjacent parcels to the south, Parcels 252601-2-034-2002 and 252601-2-044-2000, have been completed and are enclosed with this resubmittal. Connections to either parcel have been found to be infeasible.

Parametrix Finding to 4C. Comment not addressed. The applicant has not provided sufficient information to show the project site and/or surrounding area's topography make connectivity technically and physically unfeasible.

4D. 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.

Applicant Response to 4D. IFC D107.2 requires a minimum straight-line separation not less than one-half of the length of the maximum overall diagonal dimension of the property. The maximum overall diagonal dimension of the subject site is 1,918 feet, resulting in a minimum straightline separation of 909 feet. The proposed accesses on NE Crystallia Court and the eastern edge of the subject site on Sunrise Ridge Avenue provide 940 feet of separation, satisfying IFC D107.2 access separation requirements for two separate access roads.

Parametrix Finding to 4D. Comment not addressed. The two access points identified by the applicant do not meet the intent and purpose of IFC D107.2. The diagonal distance of the property should be measured from the Road C/Sunrise Ridge Avenue intersection, as that is the access point to the area beings served.

4E. 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.

Applicant Response to 4E. The project proposes access via two distinct public streets and a new connection on Sunrise Ridge Avenue to the south, satisfying access criteria defined in PMC 17.80.050(C). See Response #4A.

Parametrix Finding to 4E. Comment not addressed. The two access points identified by the applicant do not meet the intent and purpose of codes PMC 17.80.060 (to provide redundant and efficient routes and connections and to provide superior emergency vehicle response time by providing multiple access to streets) and PMC 17.80.050(C) (to provide for at least two different standard routes for ingress and egress). The applicant does not discuss sprinklering in their response to comments.

4F. 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.

Applicant Response to 4F. The NE Crystallia Court and Road C accesses satisfy IFC separation requirements for emergency access separation. See Response #4D.

Parametrix Finding to 4F. Comment not addressed. The two access points identified by the applicant do not meet the intent and purpose of IFC D107.2. The diagonal distance of the property should be measured from the Road C/Sunrise Ridge Avenue intersection, as that is the access point into the subdivision. The site access points do not meet IFC 503.1.2 because they both rely on a single road, Sunrise Ridge Road, to reach the regional roadway network, which conflicts with the codes requirement to provide “more than one fire apparatus road based on the potential for impairment of a single road by vehicle congestion, condition of terrain, climatic conditions or other factors that could limit access.”

4G. 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.

4H. Each division must meet access and safety requirements independently per PMC 17.60.040(C), which is not demonstrated.

Applicant Response to 4G, 4H. Road D has been shortened to 500 feet. This has prompted the removal of Lot 130. Additionally, Road D is planned to be constructed with Phase 3 of the project. Phase 1 will construct the entire looped roadway that Road D will then later tee off of to serve 20 units. The entire looped road is proposed to be constructed with Phase 1. Dead end road B will be built with Phase 2, and dead-end road D will be constructed with Phase 3. All phases will meet access and safety requirements independently when constructed in the noted order.

Parametrix Finding to 4G, 4H. Comment not addressed. Phase 1 will access the site via two streets that both rely on a single road, Sunrise Ridge Road, to reach the regional roadway network. This does not meet the intent and purpose of the city and fire codes to provide for at least two different standard routes for ingress and egress and to ensure the street system provides for the safe, orderly and efficient circulation of traffic, makes adequate provisions for fire and emergency access and protection, and makes appropriate provisions for the public health, safety, and welfare.