EXHIBIT 9.i: Applicant Response to City DRAFT Connectivity Memo (7/21/26)

July 21, 2026 Job No. 2090-004-022

Mr. Joshua M. Ranes, P.E.
Mr. Michael Bateman, P.E.
City of Poulsbo
200 NE Moe St
Poulsbo, WA 98370

RE: Pinnacle at Liberty Bay PRD, P-06-20-25-03
Noncompliance with PMC 17.80.050 and 17.80.060 – Response Letter

Dear Mr. Ranes and Mr. Bateman:

ESM Consulting Engineers, LLC, is submitting the following responses to the Memo that was received from you dated June 15, 2026. In an effort to provide concise and direct responses, we have copied the review comments below in *italics* and our responses are in **bold**.

The purpose of this memo is to document staff's findings regarding the proposed Pinnacle at Liberty Bay Planned Residential Development (PRD) and Preliminary Subdivision. Staff has determined that, as proposed, the project does not satisfy the City's adopted requirements for neighborhood street connectivity and multiple points of vehicular ingress and egress as required by the Poulsbo Municipal Code (PMC), Construction Standards, Transportation Plan, and adopted Comprehensive Plan goals and policies.

PMC 17.80.060 - Street Connectivity

- *The proposal does not construct the planned public street connection identified as Future Street NR-12 in the City's adopted Comprehensive Plan (Figure TR-3: 2044 New Roadway Segments Map) by connecting to Baywatch Court NE.*
- *The proposal does not provide the level of public street connectivity contemplated by the City's adopted transportation network to support multiple emergency response routes as well as future neighborhood connectivity. As proposed, large portions of the subdivision rely on a single primary access corridor, reducing roadway redundancy and limiting emergency vehicle access if that route becomes blocked or impassable.*

PMC 17.80.050 - Street Standards

- *The subdivision does not provide 2 independent public street routes for vehicular ingress and egress.*
- *Large portions of the development rely on a single internal circulation route, reducing transportation network redundancy and limiting emergency access should the primary roadway become obstructed.*

RESPONSE: The Applicant respectfully disagrees with the above conclusions. See analysis in Heath & Associations TIA Comment Response at 4 (Responses to Comments 4A and 4B) dated July 20th, 2026.

To achieve compliance with the City's adopted street connectivity standards, staff recommends the following conditions (or similar at time of Hearing):

- *Condition 1 - Baywatch Court Connection. Prior to final plat approval, the applicant shall construct a public street connection between the proposed subdivision roadway system and Baywatch Court NE, consistent with the City's adopted Future Street Plan (NR-12), unless an alternative alignment is approved by the City Engineer that provides an equivalent level of public connectivity, consistent with PMC 17.80.060 and 17.80.050.*
- *Condition 2 - Future Street Connection. Prior to final plat approval, the applicant shall dedicate and construct, or dedicate sufficient right-of-way for, a future public street connection to the adjacent southerly property (Parcel No. 252601-2-034-2002 and 252601-2-044-2000), in a location approved by the City Engineer, consistent with PMC 17.80.060.*

RESPONSE: As detailed below and in the attached submittals, these conditions are not required to meet applicable City standards.

The proposed Pinnacle at Liberty Bay PRD and Preliminary Subdivision consists of 138 detached single-family lots on 5 parcels totaling approximately 41 acres. The site presents topographic and environmental constraints, including approximately 223 feet of elevation change across the property, steep hillside terrain northeast of State Route 305, three regulated streams with associated wetlands and buffers, and areas of geologically hazardous slopes. These physical constraints have influenced the proposed street layout and are central to evaluating the project's compliance and findings with the City's requirements for street connectivity, multiple points of access, and emergency vehicle circulation.

As proposed, the primary access to the project is provided by Sunrise Ridge Ave NE, a residential collector. The project includes 23 lots that will have direct access to Sunrise Ridge Ave NE. The remaining 115 lots are serviced by an internal looped road system that connects to Sunrise Ridge Ave NE at two locations approximately 330 feet apart.

RESPONSE: This statement is factually incorrect. The project proposes access to NE Crystallia Court and to Sunrise Ridge Avenue NE, providing two distinct public street connections to the site. Sunrise Ridge Avenue NE provides an approximately 390-foot centerline separation between NE Crystallia Court and the proposed Road C intersection. See analysis in Heath & Associations TIA Comment Response at 4 (Responses to Comments 4A and 4B) dated July 20th, 2026.

Public safety and emergency response are fundamental considerations in the design of the City's transportation network and development projects. As currently designed, and absent the recommended conditions of approval, it is the determination of the City Engineer and staff that the project's proposed location, size and design do not provide the level of roadway redundancy and emergency access intended by the City's adopted codes, standards, and Comprehensive Plan to protect the public interest, health, safety, and welfare of the City. The site's topography, significant elevation changes, surrounding critical areas, and reliance on a single primary access corridor create a roadway network with limited redundancy and increase the potential for portions of the subdivision to become isolated should Sunrise Ridge Avenue NE become blocked or otherwise inaccessible.

RESPONSE: The road section crossing Barrantes Creek was eliminated as infeasible following classification of Barrantes Creek as a fish-bearing stream by the City's peer review consultant, Grette Associates, as described in response to the City's Technical Revision No. 2 (April 10, 2026). Additional comments regarding feasibility are addressed with this submittal. Regarding risk of blockage, see analysis in Heath & Associations TIA Comment Response at 4 (Responses to Comments 4A and 4B) dated July 20th, 2026.

In addition to the safety concerns, the project does not fully implement the City's adopted codes, standards, and policies for neighborhood connectivity and redundant roadway networks. The absence of connectivity to existing future road connections and neighboring parcels further limits the redundancy and connectivity envisioned by the City's adopted transportation network. The City's adopted codes, standards and policies support and require interconnected public streets that provide neighborhood circulation, future connectivity, roadway redundancy, and emergency access.

RESPONSE: The project meets all City codes, standards and policies for neighborhood connectivity and redundant roadway networks as detailed in the responses and reports provided with this resubmittal while entirely avoiding impacts of constructing a stream crossing to Barrantes Creek, a fish-bearing stream, consistent with the City's adopted Critical Area Ordinance and the Suquamish Tribe's December 19, 2025 comments.

The City's adopted Comprehensive Plan (Figure TR-3) and Transportation Comprehensive Plan (Figure 6-2) provides the City's long-term project and roadway connectivity map. There are two required roadways from the City's New Roadway map within the Pinnacle at Liberty Bay project area. Required roadway NR-13 is the completion of Sunrise Ridge Ave NE extension connecting between the existing Crystal View subdivision and Johnson Parkway NE. Johnson Parkway NE was recently completed by the City. The Sunrise Ridge extension currently exists as an emergency access roadway connecting to and constructed by the Crystal View subdivision as a condition of approval for that subdivision (P-06-22-09-01). Required roadway NR-12 connects NR-13 with the existing planned roadway stub in the Baywatch subdivision to the West.

Per PMC 17.80.060(A), PMC 17.80.050(C)(2), and the City's adopted 2044 New Roadway Segments Map (TR-3), the Pinnacle at Liberty Bay PRD project is required to complete both new roadway segments NR-12 and NR-13. Completion of these roadway segments is necessary to implement the City's adopted transportation network, mitigate transportation impacts created by the proposed subdivision, and provide improvements that are roughly proportional to those impacts.

RESPONSE: The project is completing new roadway segment NR-13. For the reasons detailed elsewhere in this submittal, the Applicant cannot feasibly construct the crossing of Barrantes Creek required to complete new roadway segment NR-12 to connect to Baywatch. While this segment is included in the 2025 Comprehensive Plan, the City's 2024 Best Available Science analysis upon which the Comprehensive Plan was based identified Barrantes Creek as non-fish bearing. The City's peer review consultant, Grette Associates, has since determined it is fish-bearing based on site-specific analysis, which requires greater clearance. Both the Comprehensive Plan and City code allow for deviations in alignment of Comprehensive Plan roadways based upon various considerations, including topography, natural features, or other conditions which make achievement of a planned alignment impractical. PMC 17.80.060(A)(1) and Comp Plan Policy TR-6.2. Such is the case here. Further, the Applicant has submitted a TIA confirming that there are no unmitigated transportation impacts resulting from the project even with elimination of the Baywatch connection.



The Pinnacle at Liberty Bay provides two primary access points from Sunrise Ridge Ave NE serving the majority of homes in the subdivision. One access point (Road C) connects directly to the new NR-13 segment of Sunrise Ridge Avenue NE to be constructed as part of the project. The second access point connects to Sunrise Ridge Avenue NE via the planned extension of NE Crystallia Court within the existing Crystal View subdivision. Together, this internal looped roadway system provides primary access to 115 of the proposed 138 residential lots. The remaining 23 lots are served by two private access roads (Tracts M and N) and ten individual driveways with direct access to Sunrise Ridge Avenue NE. Although the subdivision includes two access points to Sunrise Ridge Avenue NE, both ultimately rely on the same public roadway corridor for ingress and egress from the development.

The two primary access points have an effective access distance along Sunrise Ridge Ave NE being approximately 330' apart. Tracts M and N access Sunrise Ridge Ave NE approximately halfway between the two primary access points. All of these connections access a single road - Sunrise Ridge Ave NE.



Providing the required new roadway segment NR-12 connecting to the existing Baywatch subdivision satisfies the City's adopted Future Roadway Segments Map, neighborhood connectivity requirements, and the requirement for multiple redundant connections accessing different streets as required by PMC 17.80.050 and 17.80.060. This connection also satisfies International Fire Code (IFC) section 503.1.2 Additional Access where there is the potential for impairment of a single road by vehicle congestion, conditions of terrain, climactic conditions and other factors that could limit access, as well as IFC Appendix D D107.2 Remoteness requirements for distance between access points. Constructing this required roadway connection further mitigates the project's transportation impacts by avoiding the concentration of project traffic on a single roadway (Sunrise Ridge Avenue NE) and distributing trips across the surrounding street network, providing more direct westbound access to SR 305 for residents in the western portion of the development.

RESPONSE: As noted above, the above analysis is incorrect in several material respects, including but not limited to that Fire Code provisions are not satisfied. In fact, they are. See analysis in Heath & Associations TIA Comment Response at 4 (Responses to Comments 4A, 4B, 4D, 4E, and 4F) dated July 20th, 2026 and the previously submitted Access Separation Exhibit dated June 24, 2026.

Additionally, the Baywatch connection provides a more direct route with greatly reduced grade limitation for most of the route to the subdivision for emergency response and shortens the emergency response route distance to homes in the Road D cul-de-sac from approximately 2.1 miles via Sunrise Ridge Ave NE from the North and 2.7 miles via SR305/Johnson Parkway from the South to approximately 1.6 miles via SR305/Baywatch Ct NE.

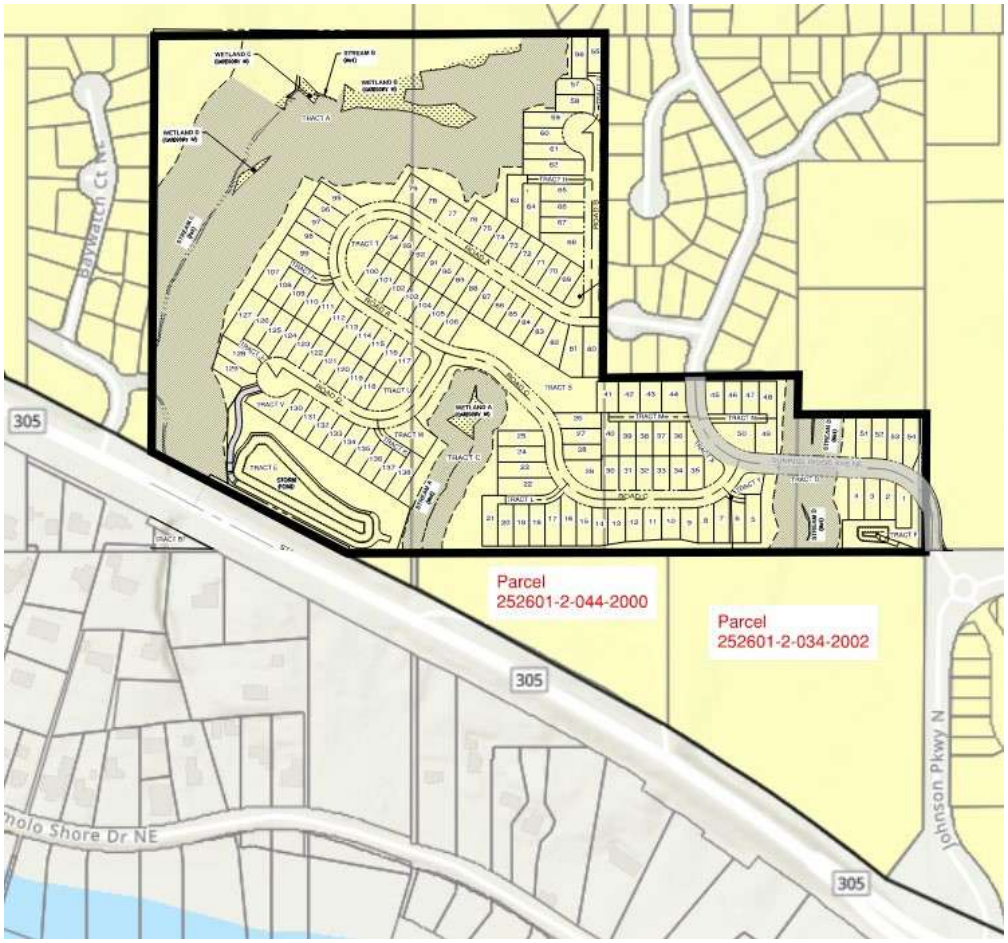
RESPONSE: While it may be more direct, the Baywatch connection to the west cannot feasibly be built to City standards, as documented elsewhere with this resubmittal. Regarding emergency response times, the Applicant previously submitted an analysis of Emergency Response Times prepared by Heath & Associates showing in enclosed Figure 2, is adequate emergency access to the project from north and south which experience de minimis changes without the Baywatch connection.

The project is proposed to be constructed in three divisions. Per PMC 17.60.040(C), all divisions must meet all requirements independently from any other division. Under the current proposal, without construction of the Baywatch connection, the first division will have over 30 homes accessed from a single roadway, violating the requirements of PMC 17.80.050(C) and IFC D107.1. Sprinklering of those homes would be required in addition to any other mitigation deemed appropriate by the Fire Code Official and City Engineer. Construction of the NR-12 Baywatch connection during the first division would eliminate the need for residential fire sprinklers required solely due to the single-access limitation under IFC Appendix D.

RESPONSE: This comment is incorrect. The entire looped road (Roads A and C) will be constructed with Phase 1; dead end Road B will be constructed with Phase 2, and dead-end Road D will be constructed with Phase 3. The Applicant notes that even if the analysis were correct, it could be addressed with a condition requiring residential fire sprinklers in Phase 1.

There are two adjacent properties to the South of the project that do not currently have a feasible connection showing from the Pinnacle at Liberty Bay properties - property tax id 252601-2-034-2002 and 252601-2-044-2000. The applicant is required to demonstrate the feasibility of providing these future street connections, unless exempted by the City Engineer pursuant to PMC 17.80.060(B)(6). When required, demonstration of the feasibility of providing the connection must be included in the development permit application per PMC 17.80.060(B)(4). During the public comment period, the owner of property tax id 252601-2-034-2002 requested connection to that property from the Pinnacle at Liberty Bay project be provided. As of the date of this memo, the applicant has not requested an exemption from these requirements, the City Engineer has not granted an exemption, and no documentation demonstrating the feasibility of the future street connections has been submitted.

RESPONSE: The Applicant notes that the City did not request any analysis of connectivity to the southern parcels as part of the two rounds of earlier City review which preceded elimination of the proposed Baywatch connection. Notwithstanding this earlier omission, the Applicant has completed the requested analysis and determined connections are not feasible to provide to the two identified parcels See attached letters requesting exemptions to providing connection of both parcels under PMC 17.80.060(B)(6).



Findings of Fact

The requirement to provide new roads NR-12 and NR-13 is directly related and proportionate to the transportation impacts generated by the proposed subdivision. These roadway improvements implement the City's adopted Comprehensive Plan, Transportation Comprehensive Plan, and development regulations; support the City's obligations under the Growth Management Act to provide an adequate transportation system to serve planned growth; improve neighborhood connectivity, roadway redundancy, and emergency access; and are feasible to construct as part of the proposed development.

Conclusion

The requirement for construction of planned roadways NR-12 (Baywatch connection) and NR-13 (Sunrise Ridge Ave NE extension) per City codes and standards is a proportional requirement to mitigate new impacts to street connectivity, access, egress and public safety caused by the construction of the Pinnacle at Liberty Bay project. This requirement is also consistent with how other development projects throughout the City have been required to provide connections to existing and planned future roadway networks. The required improvements are also consistent with prior City actions requiring transportation connectivity despite environmental constraints, including the adjacent Crystal View subdivision, which constructed an emergency access roadway across a stream, and the Johnson Parkway project, which required crossings of two streams and approximately 2.3 acres of wetland mitigation to implement the City's adopted transportation network. . Both of these projects directly benefited the Pinnacle at Liberty Bay project and are consistent with the requirements of the Pinnacle development.

Minor deviations to the City's Engineering Construction Standards, as authorized by Section 1(C) may be approved by the City Engineer to facilitate construction of the NR-12 Baywatch connection and should be evaluated before concluding that the required roadway connection is infeasible. If detailed analysis demonstrates to the City Engineer's satisfaction that providing the required public roadway connection is infeasible, construction of an emergency access point with pedestrian accommodations to the Baywatch subdivision shall be completed to mitigate project impacts to the extent feasible.

Construction of roadway segments NR-12 (Baywatch connection) and NR-13 (Sunrise Ridge Avenue NE extension) shall be required as conditions of approval for the project.

Demonstration of the feasibility of providing future public street connections to Parcel Nos. 252601-2-034-2002 and 252601-2-044-2000, as required by PMC 17.80.060, shall be required as a condition of approval and reflected in the project plans and supporting application materials.

Basis for connectivity and access requirements

The City Engineer is required by Poulsbo Municipal Code to make findings in the plat approval process specific to street connectivity, access to adjacent parcels and multiple points of access and egress. The City's adopted codes, engineering standards, and policies establish the applicable findings and decision criteria contained in PMC 17.60.040(A) & (B) and PMC 18.260.140(A), (B), (I), (J) & (L). These findings evaluate whether the proposed development adequately addresses its impacts on street connectivity, access, egress, roadway redundancy, and public safety while complying with the City's adopted regulations. As currently proposed, staff cannot make these required findings without the recommended conditions of approval.

Multiple points of access and egress are necessary to mitigate the transportation and public safety impacts generated by the proposed subdivision. These impacts include connectivity issues, need for sufficient and redundant emergency access, and roadway

system redundancy. Specifically, PMC 17.80.050(C) requires that preliminary plats shall provide at least two different routes for ingress and egress. Additionally, per PMC 17.80.050(C)(2), when only one public street provides primary access to the entrance points of a residential subdivision, an additional emergency access road must be established that connects to a different road than the primary access points.

PMC 17.80.060(B) requires new subdivisions to connect to, or provide future connections for, adjacent properties. Additionally, PMC 17.80.050(C)(2)(a) establishes emergency access requirements, while PMC 17.80.060 requires an interconnected street network that provides future connectivity and roadway redundancy.

PMC 17.80.050(C) and PMC 17.80.060(B)(6) authorize the City Engineer to approve limited exemptions from certain street connectivity requirements under specific circumstances, provided appropriate mitigation measures are implemented. These measures may include, but are not limited to, residential fire sprinklers, roadway widening with turnouts, or phased development, as provided in PMC 17.80.050(C)(2)(b)(ii). It is important to note that while sprinklering of homes does provide significant life safety benefits in the event of structure fire, emergency access decisions must also include consideration of redundant access to homes to minimize response times and provide access alternatives to medical emergencies in all weather conditions.

RESPONSE: The Applicant disputes the above findings and conclusions for the reasons noted above and in the technical analyses submitted concurrently with this response, and therefore respectfully objects to the imposition of corresponding proposed conditions of approval requiring the project to construct roadway segment NR-12 as well as the future public street connections to the properties to the south.

References

Note that Poulsbo Municipal Code is the implementation of the City's Comprehensive Plan policies. As such, relevant comprehensive plan policies are included here to inform interpretation of municipal code being referenced and analyzed in this document.

RESPONSE: The Applicant notes that the references to the Comprehensive Plan and municipal codes provided in this analysis relate exclusively to connectivity and transportation and fail to consider consistency or compliance with other equally applicable City goals, policies, and codes relevant to construction of a stream crossing over Barrantes Creek now that it has been identified as a fish bearing stream. These include, but are not limited to, the following:

<u>COMPREHENSIVE PLAN</u>

Policy NE-1.1: The City shall protect critical areas, habitat and the natural environment through land use plans, surface water management plans and programs, comprehensive park plans, development regulations and site-specific project review.

Policy NE-1.2 The City shall maintain regulations such as the Critical Areas Ordinance (CAO), which provide protection for all regulated critical areas – a) wetlands; b) areas with a critical recharging effect on aquifers (aquifer recharge areas); c) frequently flooded areas; d) fish and wildlife habitat conservation areas; and e) geologically hazardous areas. The City's CAO development standards shall incorporate and utilize appropriate and applicable best available science for purposes of designating and protecting all regulated critical areas and give "special consideration" to conservation and protection measures for anadromous fisheries.

Policy NE-1.4 The City shall promote innovative and environmentally sensitive practices techniques in site planning, design, materials selection, construction, and maintenance.

Policy NE-1.5 The City shall support environmental stewardship on private and public lands through partnerships and voluntary efforts to protect, restore and enhance the quality and functions of the City's critical areas and associated buffers.

GOAL NE-6 Protect biological diversity by appropriately regulating fish and wildlife habitat conservation areas.

Policy NE-6.1 The City's Critical Areas Ordinance shall require vegetative buffers along surface waters to protect anadromous fish and wildlife habitat. New development shall be subject to buffers or resource management areas, as identified in the Critical Areas Ordinance and other applicable development standards.

Policy NE-6.2 The City shall protect the natural habitat functions of listed or candidate Endangered Species. The City's Critical Areas Ordinance shall establish appropriate protection measures and procedures for habitat conservation.

Policy TR-6.6 Ensure environmental protection, water quality, and other applicable environmental standards, through best management practices during the design, construction, and operation of the City's transportation system, including:

- Design transportation improvements consistent with City's stormwater regulations, striving for enhanced water quality standards, and minimizing impacts to fish and wildlife habitat areas.

<u>Poulsbo Municipal Code</u>

PMC 16.20.320(I) Road/Street Repair and Construction. Public road or street repair, maintenance, expansion or construction may be allowed in fish and wildlife habitat conservation areas or their RMZs subject to the following development standards:

1. No other reasonable or practicable alternative exists;

PMC 16.20.155, "Mitigation" means an action or set of actions undertaken to avoid, minimize or compensate for adverse critical area impacts. Mitigation includes the following steps, in sequential order (WAC 197-11-768):

A. Avoiding the impact altogether by not taking a specific action or part of an action.

B. Minimizing impacts by limiting the degree or magnitude of the action and its implementation, by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts.
C. Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.
D. Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
E. Compensating for the impact by replacing, enhancing or providing substitute resources or environments.
F. Monitoring the impact and taking the appropriate corrective measures.

[remainder omitted]

Should you have any questions or require additional information, please do not hesitate to contact us at (253) 838-6113.

Sincerely,

ESM CONSULTING ENGINEERS, LLC



ROBBY OVERFIELD
Project Manager

Encl. Figure, 1, Figure 2

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