EXHIBIT 9.n: Hinton Engineering Access Road Opinion

TECHNICAL OPINION REPORT
Fire Protection Engineering Assessment
Pinnacle at Liberty Bay Subdivision
Date: September 9, 2026
Prepared by: Robert Hinton, PE - Hinton Engineering

Purpose

This report provides a conceptual fire protection engineering assessment of the proposed housing development, Pinnacle at Liberty Bay Subdivision. It evaluates road access in accordance with the International Fire Code (2021 Edition).

Background

The proposed development has 130 one or two family residential units. The maximum overall dimension of the development is 1,818 feet and the proposed separation between the two access roads is 940 ft as shown on Access Separation Exhibit Sheet EN-37 dated 06/24/2026.

Fire Apparatus Access-Road Remoteness Opinion

Basis of assessment: 2021 International Fire Code (IFC), Appendix D, Section D107.2. The maximum overall diagonal dimension of the property or area served is 1,818 feet. Appendix D requires two required fire-apparatus access roads to be separated by not less than one-half of that dimension, measured in a straight line between accesses.

1,818 ft / 2 = 909 ft minimum separation

The proposed straight-line separation between access roads is 940 feet. The proposed separation exceeds the required 909 feet by 31 feet.

Opinion: The proposed access-road arrangement complies with the remoteness requirement of 2021 IFC Appendix D.

For a one- or two-family residential development, Appendix D Section D107.1 also provides an exception to the two-access-road requirement where more than 30 dwelling units are served by a single public or private fire-apparatus access road and all dwellings are equipped throughout with an approved automatic sprinkler system installed in accordance with IFC Section 903.3.1.3 (NFPA 13D). Based on this exception, access from two directions is not required by Appendix D.

Review and Response to Comments Regarding Fire Code Compliance

Peer Review Comments

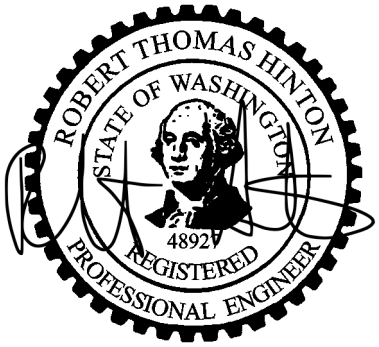
The City's peer reviewer, Parametrix, commented that "The two access points identified by the applicant do not meet the intent and purpose of IFC D107.2. The diagonal distance of the property should be measured from the Road C/Sunrise Ridge Avenue intersection, as that is the access point to the area beings served."

Hinton Engineering's response: The distance measured and shown on Access Separation Exhibit Sheet EN-37 dated 06/24/2026 is acceptable as there is access from the north on Sunrise Ridge Ave NE. This is a separate and distinct access and does not require travel on Sunrise Ridge Ave NE from the project/site access point.

Comments from Washington State Deputy Fire Marshal

The comments provided by the State Fire Marshal's Office state that "an NFPA 13D system is not recognized by NFPA as a substitute for community vehicular egress capacity or an evacuation route."

Hinton Engineering's response: The International Fire Code (2021 edition) specifically states in Appendix D107.1 Exception 1, that access from two directions shall not be required where all dwelling units are equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.3 which requires one- and two-family homes to be sprinklered in accordance with NFPA 13D specifically.
The comments also refer to NFPA 1141 *Standard for Fire Protection Infrastructure for Land Development in Wildland, Rural, and Suburban Areas*, which is not referenced by the International Fire Code (2021 edition) and is not applicable.



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