EXHIBIT 9.r: Engineering Memo – Project Areas and Access Points ICC Code Interpretation (10/27/26)

ENGINEERING DEPARTMENT

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MEMO

To: Project file
From: Michael Bateman, PE | Transportation Engineer
Subject: ICC Code Interpretation Request | Pinnacle at Liberty Bay PRD | P-06-20-25-03
Date: October 27, 2026

The City of Poulsbo is a member of the International Code Council (ICC). The ICC offers code interpretation assistance to its members.

The following Project Areas and Access Points – City Determination document was developed by Engineering staff and forwarded to the ICC by the City's Building Official Matt Logue for interpretation guidance.

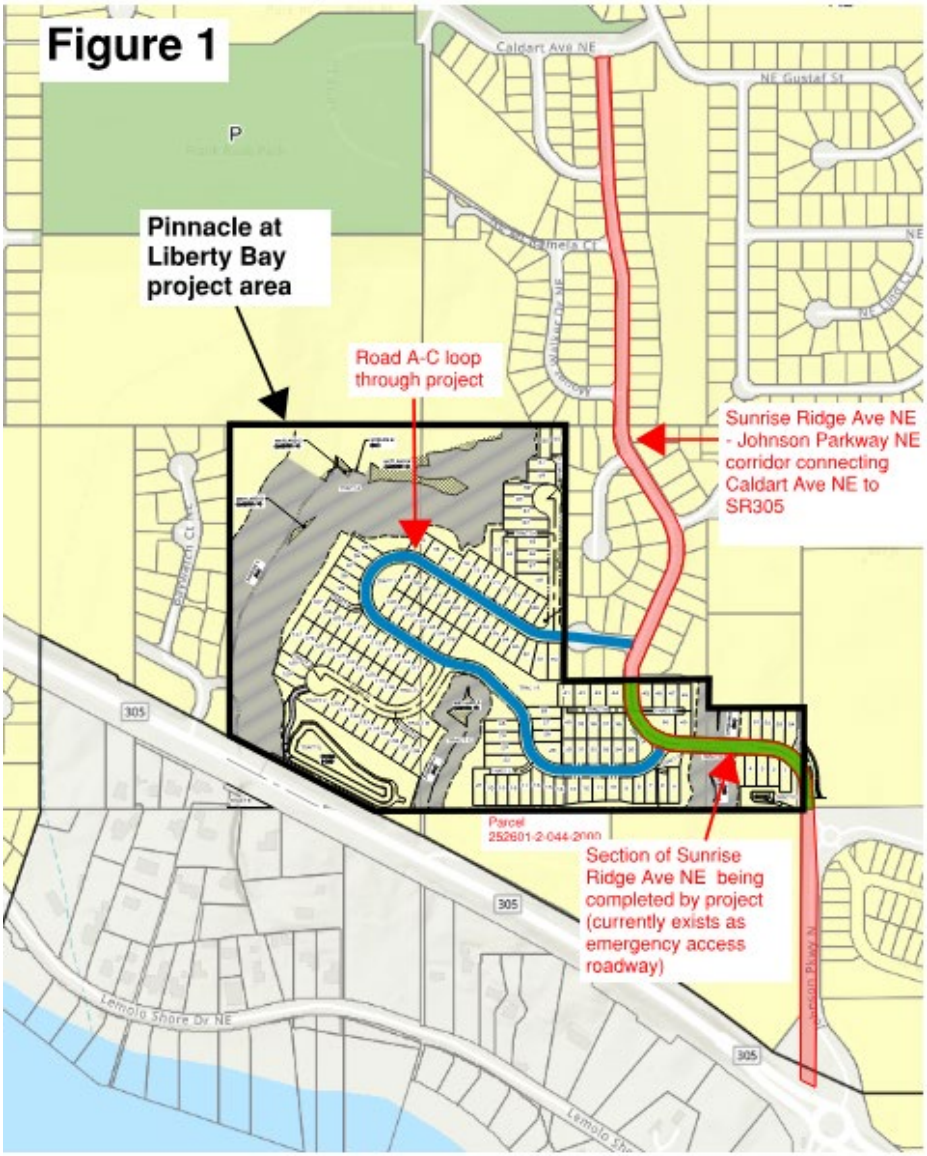
The response and guidance from ICC follows, indicating that the City is correctly interpreting and applying International Fire Code.

Project Areas and Access Points - City Determination

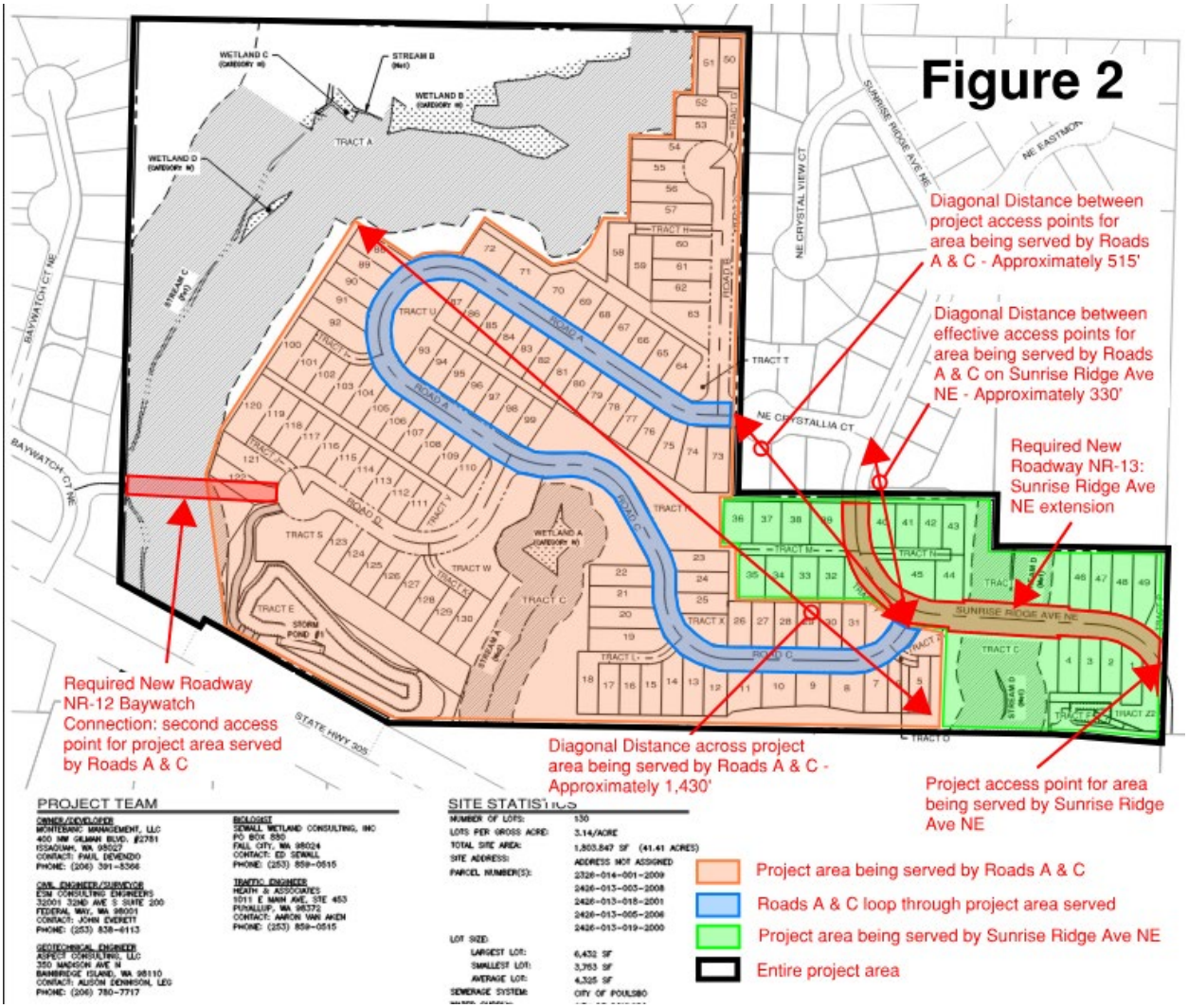
The Pinnacle At Liberty Bay project is a proposed subdivision within the City of Poulsbo. The project area is approximately 41 acres, of which 23.8 acres will be developed into 130 single family residential lots. The remaining 17.2 acres are largely critical areas and will remain undeveloped. The project area and surrounding terrain are steep with large portions of the roadway network at or near the City's maximum 12% grade.

The project as proposed connects to an existing North-South corridor (Sunrise Ridge Ave NE-Johnson Parkway NE) through existing developments, connecting Caldart Ave NE to the North with State Route 305 to the South, highlighted Red in Figure 1 below. A portion of that corridor currently exists and an emergency access roadway which will be completed to full City standards by the project as required (green section in Figure 1 below).

The project has 22 lots that will have direct access to Sunrise Ridge Ave NE either via direct driveway connection or private roads serving no more than 8 lots. The remaining 108 lots will be served by a looped roadway (Roads A and C) which connects to Sunrise Ridge Ave NE. There are two additional dead-end cul-de-sacs (Roads B and D) connecting to that looped roadway.



It is the determination of the City's Engineering Department and Fire Code Official that the project has two distinct areas within the overall project area being developed from a fire apparatus access roadway standpoint. One area highlighted in green in Figure 2 below consists of lots 1-4 and 32-49 that have direct access to City collector roadway Sunrise Ridge Avenue NE. The second area highlighted in orange below consists of lots 5-31 and 50-130 served by internal looped Roads A & C highlighted in blue which connect to Sunrise Ridge Avenue NE via existing NE Crystallia Ct to the North, and directly to Sunrise Ridge Avenue NE to the South. The project's effective connection points on Sunrise Ridge Avenue NE are approximately 330 feet apart.



The City has adopted IFC section 503 and Appendix D in their entireties.

It is the City's determination that the project area served by the Road A-C loop exceeds 30 dwelling units and per the requirements of IFC D107.1, two separate and approved fire apparatus access roads must be provided. Additionally, the City's Fire Code Official as authorized by IFC 503.1.2 has determined that a second fire apparatus access road is required for that project area due to the potential for impairment of a single road by vehicle congestion, condition of terrain, climatic conditions or other factors that could limit access. The City's Engineering Department concurs with this determination.

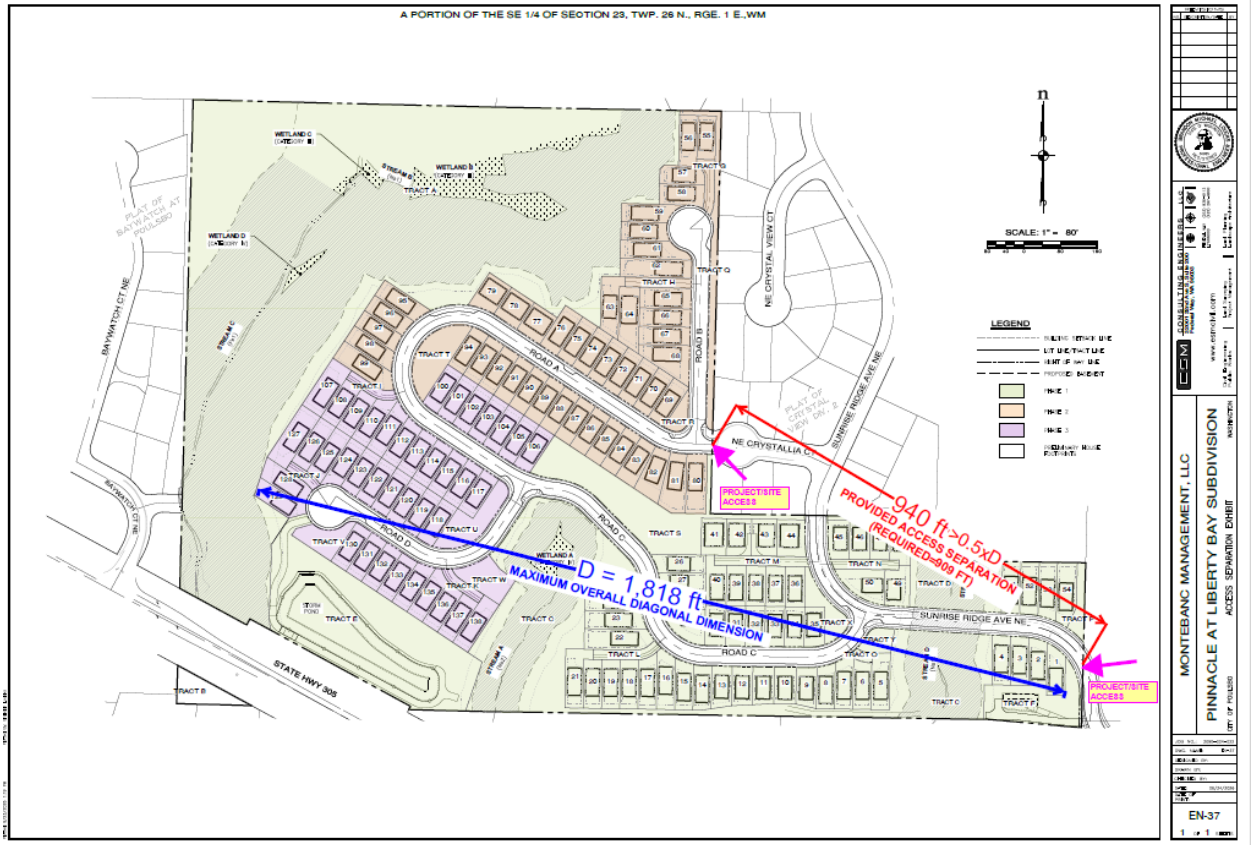
Per the remoteness requirement in IFC Appendix D 107.2, those access points must be a distance apart equal to one-half of the diagonal distance of the area being served.

It is the City's determination that the diagonal distance across the area being served by the Road A-C loop is 1,430 feet, therefore the required distance between access points for the project area being served by the road A-C loop is one-half of 1,430 feet – **715 feet**, and that as-proposed with the effective distance between Road A-C loop connections to the Sunrise Ridge Ave NE collector roadway approximately 330 feet apart, the area served by Roads A & C does not meet the requirements of IFC Appendix D, and as such will be requiring that the project complete the New Roadway NR-12 connection to the adjacent Baywatch subdivision per the City's comprehensive

plan. Reference Figure 2 above. The City has determined that with the NR-12 Baywatch connection, the project will meet the requirements of the International Fire Code as adopted, and will be including a requirement for that connection in the project conditions of approval.

Project Areas and Access Points – Applicant Submittal

The project applicant has submitted a figure with the application materials with a different interpretation of the IFC code requirements, contending that the project meets IFC requirements as-proposed.



Question for ICC staff

Is the City correctly interpreting and applying the requirements of the International Fire Code as adopted by the City?

ICC Staff Response:

From: Scott W. Adams <jira@icc-ts.atlassian.net>
Sent: Sunday, October 18, 2026 5:44 PM
To: Matt Logue <mlogue@poulsbo.gov>
Subject: ICCTO-8135 Remoteness Measurement

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Reply above this line.

Scott W. Adams has commented on your request:

This Response as Provided for ICCTO-8135 Done - Remoteness Measurement

Mr. Logue:

This response is provided to your inquiry regarding the fire apparatus access road and remoteness requirements for the proposed subdivision. Unless specifically noted otherwise, our responses herein are based on the 2021 International Fire Code (IFC).

Under Section 101.2.1, the City of Poulsbo's specific adoption of Appendix D makes its provisions enforceable within the jurisdiction, in conjunction with the applicable fire apparatus access road requirements of Section 503.

Our response is based on the information provided for a subdivision that comprises more than 30 dwelling units and includes two access points that are separated by approximately 330 feet. The maximum overall diagonal dimension of the area served is approximately 1,430 feet, and a potential roadway to the adjacent subdivision. The issue presented is whether this access configuration complies with Sections D107.1, D107.2 and 503.1.2.

Analysis of Code Basis:

1. **Requirement for Two Separate Access Roads (Section D107.1 and Section 503.1.2):**
    1. **Section D107.1 (One- or Two-Family Residential Developments): This section mandates that one- or two-family residential developments where the number of dwelling units exceeds 30 must be provided with two separate and approved fire apparatus access roads. The portion of the subdivision served by the internal looped roadway network exceeds the 30 dwelling-unit threshold. As such, a minimum of two fire apparatus access roads are required.**
    2. **Section 503.1.2 (Additional Access): This section authorizes the fire code official to require more than one fire apparatus access road where potential impairment of a single road could occur due to vehicle congestion, terrain conditions (such as the steep slopes and 12 percent grades present on site), climatic conditions or other factors that could limit emergency access.**
2. **Remoteness Determination and Measurement:**

1. **Section D107.2 (Remoteness): This section states that where two fire apparatus access roads are required, they must be placed a distance apart equal to not less than one-half of the length of the maximum overall diagonal dimension of the property or area being served and measured in a straight line between accesses.**
2. **Application of the Area Being Served: The code permits the evaluation to be based on the property or area being served. Evaluating the development according to the distinct areas served is consistent with this provision.**
3. **Remoteness Calculation: For an overall diagonal dimension of 1,430 feet across the area served by Roads A and C, the required minimum straight-line separation distance between access points is 715 feet. (1,430 feet / 2)**
4. **Compliance with Required Access Separation: The proposed access points at Sunrise Ridge Avenue NE (NE Crystallia Court to the north and the direct connection to the south) are separated by approximately 330 feet, which does not satisfy the required minimum of 715 feet.**

3. **Purpose of Access Separation and the NR-12 Baywatch Connection:**
    1. **The purpose of Section D107.2 is to ensure that a single emergency event, roadblock, fallen tree, collision, utility failure or landslide/washout along the access route cannot simultaneously obstruct or compromise both access points to the development.**
    2. **Placing both access points only 330 feet apart along the same collector roadway creates a localized bottleneck and does not achieve true remote secondary access for this development.**
    3. **In our opinion, requiring the completion of the new Roadway NR-12 connection to the adjacent Baywatch subdivision establishes an independent secondary access route from an entirely separate roadway network, directly satisfying the remoteness intent and prescriptive criteria of Section D107.2.**
4. **Authority of the Fire Code Official: Sections 104.1 (General Authority and Responsibilities) and 503.1 authorize the fire code official to administer and enforce the code, including determining whether fire apparatus access roads provide adequate access based on site conditions, roadway configuration and operational safety considerations.**

This response is advisory in nature, and the final interpretation, approval and enforcement rest with the fire code official, as applicable, for the jurisdiction in question.

Should you require any additional information, please do not hesitate to contact us.

Scott W. Adams, PE
Fire Protection Engineer
Technical Services
International Code Council

You may reply to this email to add comments to your request.

Scott W. Adams resolved this as Answered.

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