



Fire Prevention and Investigation **CHELAN COUNTY**

STATE OF WASHINGTON

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Mission Ridge DEIS Comments

As the Chelan County Fire Marshal, I wish to make the following comments on the Mission Ridge Draft Environmental Impact Statement issued August 28, 2025.

I have keyed my comments to the Fire Risk section of Table 2.4, Phase and Mitigating Conditions Summary. My comments should also be read as applying to the discussion in the main body of the DEIS that corresponds to these parts of Table 2.4.

Table 2.4. Phase and Mitigating Conditions Summary

Section and Element

4.2 Fire Risk

- The DEIS states during construction the applicant will have a 300-gallon pump truck on site. Per the code all fire flow must be in place before any combustible material is allowed on site. So, the use of a pump truck is not an acceptable option.
- The DEIS also states the applicant must annex into CCFD1 but to my knowledge there has been no movement on this. In my prior comment letter from May 2025 on the pre-issuance DEIS, I stated that the DEIS should include more discussion on when annexation into CCFD1 will be completed. I also stated that the DEIS should address how the applicant's pre-annexation discussions with the District have proceeded. Those remain as concerns because those issues are not addressed in any detail in the current document. This concern includes addressing how the annexation into CCFD1 will address staffing standards.
- There is not much information on the proposed fuel break or how it will be maintained.
- The reference to fuels mitigation through thinning erroneously suggests that this can be submitted to the County Fire Marshal for approval. The Fire Marshal has no control of this or the permitting for it.

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- The discussion on safe refuge areas and their locations needs more information. This should include how those areas will be kept clear, and what consequences could be expected if they are blocked?
- What means will be used to assure that all houses will remain fire wise?
- How will requirements for a fire sprinkler and monitored fire alarm be enforced for every home and building? There is a significant difference between fire extinguishers and fire sprinkler systems.
- The evacuation/rescue plan does not address foreseeable difficulties in an actual emergency situation, such as the effect of panic, people that don't normally hike, ADA requirements, a chance of someone getting hurt and then needing help while firefighters are trying to put the fire out, and the unpredictability of fire behavior.

Aside from Table 2.4, and also with reference to my May 2025 letter, the DEIS discussion of secondary access still does not support an informed decision on the relevant criteria under IFC 503.1.2. The IFC requires the fire code official to consider several factors regarding the effect of a single vs. multiple access roads. While the DEIS contains an improved discussion on fire behavior, there is no synthesis of how the DEIS materials relate to risk assessment of a single access road in a way that corresponds to the IFC's factors. The DEIS currently suggests that the IFC code is "similar" to the CCC and references a "practicality concept" expressed by the applicant but does not further engage with the IFC factors. A very important function of the DEIS should be to address the IFC factors in a way that allows the fire code official to analyze and make a comparison of hazards, exposure, and vulnerability at the development site and in the surrounding community as a result of a single vs. multiple access roads.

With respect to newly identified housing for employees, this will still require fire flow to be in place prior to construction.

Thank you for this opportunity to comment on the DEIS.

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Chelan County Fire Marshal