

CHELAN COUNTY

DEPARTMENT OF PUBLIC WORKS

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Mission Ridge Expansion Master Planned Resort Draft EIS Mike Kaputa, Chelan County Department of Natural Recourses 411 Washington St. Suite 201 Wenatchee, WA, 98801

Mr. Kaputa,

As the Director/County Engineer of Chelan County Public Works, I am providing these comments on the Mission Ridge Expansion Master Planned Resort Draft EIS issued for this project and dated September 6, 2025.

Page ES-4 Table ES-1

Employee housing is shown occurring during Phase 1. The traffic impact analysis doesn't show it occurring until Phase 2. Address the change and impact of this in the traffic impact analysis.

Page ES-11 Table ES-2

For construction traffic management plan approval, the reference to Chelan-Douglas Transportation Council should be to Chelan County.

For additional monitoring and supplemental TIA to be completed, the reference to Chelan-Douglas Transportation Council should be to Chelan County.

Between Page ES-15 and Page ES-16, Table ES-3

Section 4.2 - Under the Summary of Proposed Mitigation it is stated

"Applicant will update Wildfire Plan and Crisis Action Plan and maintain emergency access planning, which includes widening the single-access road for emergency services..."

Same comment as for Page 4-24 below. Please describe where the widening will be constructed.

Section 5.6- Squilchuck Road monitoring - see Traffic Impact Mitigation below

CCC 8.24 is incorrectly cited. The correct code is CCC 15.30.

Page 2-9- It is stated "Due to the proposed phased construction schedule and the uncertainties associated with projecting traffic impacts 20 years in the future, it was proposed in the TIA that an updated TIA be required prior to the approval of any development that would generate more than 550 PM(i.e., evening) peak-hour trips (approximately Phase 3), which has been adopted as a mitigation requirement."

The May 2025 TIA identifies that a supplemental TIA is to be performed prior to Phase 4. I do not see any reference to 550 PM peak-hour trips. Please align this statement to the May 2025 TIA mitigation recommendations.

Between Page 2-16 and page 2-17, Table 2.4

Page 4-45

Section 4.2 page 4 of 15- It states "The Applicant will complete and maintain thinning and fuel reduction buffer along the single-access road..."

Given that Mission Ridge Road is also a single-access road, please clarify the intended roadway. Please see additional comments below on Page 4-45.

Section 5.3 page 7 of 15
Recommend mentioning stormwater flow control and treatment for roadway runoff in accordance with the Eastern Washington Stormwater Manual or equivalent at the time of construction.

Section 5.6 page 13 of 15- CCC 8.24 is incorrectly cited. The correct code is CCC 15.30.

Squilchuck Road at Pitcher Canyon Rd - see Traffic Impact Mitigation below

Page 4-24

It states "construction of drivable shoulders, intersection improvements, and strategic widening to allow flexibility such as use of shoulders or median areas to create two outbound lanes during evacuations." This has not been discussed before and I have not seen where it would be planned. Given Mission Ridge Road is not currently wide enough to allow for 3 lanes (2 outbound, 1 inbound) please elaborate where these would be.

Under Emergency Access it states: "Thinning and fuel reduction buffer along the single-access road from the existing parking lot to the new development as requested by CCFD1 (CCFD1, 2022). An example provided by CCFD1 presents a 100-foot buffer where slopes are accessible based on USFS or WA DNR guidelines for thinning and fuel reduction. The Applicant will coordinate with the agencies to determine requirements for fire prevention on

public lands. As determined by the agency, the Applicant will pay a proportionate cost of the treatment activity."

The section of roadway described will be constructed to gain and provide access to the proposed development. Please expand on how any of the cost for implementing and maintaining this mitigation would be shared by any other entity. Since Mission Ridge Road is also a single-access road to the proposed development, has this treatment been considered for that roadway?

Page 5-73 last paragraph CCC 8.24 is incorrectly cited. The correct code is CCC 15.30.

<u>Page 5-124 first paragraph</u> Add Chelan County to last sentence.

Traffic Impact Mitigation

Between Page 2-16 and page 2-17, Table 2.4 Page 13 of 15

It is stated "The timing for the addition of an acceleration lane at Squilchuck Road at Pitcher Canyon Road will be evaluated through additional monitoring. Squilchuck Road capacity will be monitored after each Phase of the project. Additional mitigation will be required based on monitoring results."

Page 5-76 Table 5.6-4

It is stated "Road widening to include an acceleration lane. The TIA recommended this mitigation to be delayed and reevaluated after Phase 3; however, Chelan County will require additional monitoring to determine if mitigation can be deferred until after Phase 1 or Phase 2. The additional analysis will need to show that the phase under consideration can be completed without the intersection operating below LOS C."

Page 5-79 under Squilchuck Road corridor

It is stated "...Findings using the HCM methodology indicate the Squilchuck Road would operate at LOS D during the 2034 Saturday PM peak hour for the northbound direction based on a 2022 construction start date, which does not meet County's LOS C standard. The TIA does not include proposed mitigation, but KPG(2025) recommended, and Chelan County requires, monitoring after each phase of project development, prior to permitting the next phase. Mitigation will be required based on monitoring results; impacts as mitigated are not expected to rise to a level of significance."

Page 5-80

It states "The timing for the addition of an acceleration lane at Squilchuck Road at Pitcher Canyon Road will be evaluated through additional monitoring. Squilchuck Road capacity will be monitored after each Phase of the project. Additional mitigation will be required based on monitoring results."

The May 2025 traffic impact analysis performed by Kimley-Horn and Associates identified that at a point during phases 1 through 3, both the Squilchuck Road and Pitcher Canyon Road intersection and Squilchuck Road capacity will fail Chelan County's Level of Service requirements. According to the Growth Management Act (RCW 36.70A.070 (6)(b)), if a Level of Service standard is not met, it needs to be mitigated at the time of development or financial commitment is in place to complete the mitigation within 6-years. So, a phase cannot begin until mitigation is complete prior to the project or within six years. We cannot wait and see after the phase has begun or been completed to verify if mitigation is needed nor even continually monitor.

Given the TIA analyzed Phases 1 through 3 as a combined analysis, mitigation would be required prior to Phase 1. A proposed mitigation for meeting the Squilchuck Road capacity is required to be identified for review of adequacy and impacts associated with it.

2025 Traffic Impact Analysis

Comments contained in my June 9, 2025 memo have not been addressed in the Traffic Impact Analysis given no updates were performed after submittal of my comments. However, some main points such as the proper methodology for capacity analysis of Squilchuck road are included in the DEIS.

In particular, one comment not addressed is the assertion that the location of channelized intersections along the route could improve the PTSF from what is reported. The only channelized intersection is Wenatchee Heights and it is 4 ½ miles to the nearest one in the UGA of Wenatchee. If it is true and it could improve the PTSF, I recommend commenting on approach spacing and non-channelized intersections and their effect.

Sincerely,

Eric Pierson, PE

Director/County Engineer