



CHELAN COUNTY
DEPARTMENT OF COMMUNITY DEVELOPMENT
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MEMORANDUM

DATE: October 20, 2025
TO: Mike Kaputa, Natural Resources Director
FROM: Deanna Walter, Community Development Director
RE: Mission Ridge Expansion DEIS Comments



Chelan County Community Development has reviewed the Draft Environmental Impact Statement for the proposed Mission Ridge Expansion project. These review comments include programmatic concerns, incomplete or inadequate information, and unclear or undefined mitigation measures.

The comments provided address the information included in the DEIS, but does not include project related review that would occur under the MPR regulatory permitting and existing adopted codes. As noted in the DEIS, additional information and/or mitigation may be required as part of the land use permitting under the MPR.

1. The DEIS discusses mitigation measures in a manner that is similar to the general narrative text of the document. Where possible, the DEIS should identify its proposed mitigation measures in precise, specific terms. This is necessary to allow a decisionmaker to understand how the mitigation measures would be established as required mitigation and/or conditions for Hearing Examiner approval. See WAC 197-11-660. The discussion of mitigation measures is often not stated in ways that would be readily adapted for use in the Master Planned Resort (MPR) project review process. For example, proposed mitigation measures found in Table 2.4 regarding impacts to Earth state that specific measures will be dependent upon additional studies to be done that will identify specific impacts. Additional mitigation may be required as more detailed analysis and professional studies are prepared, along with detailed project review by agencies of jurisdiction. Another example can be found in the same table in section 5.2 Groundwater, in which it is indicated that if wastewater is discharged via OSS/LOSS, applicant will obtain approval from CDHD or DOH. It is difficult to understand what impact is being mitigated and whether there will be an impact or not.
2. The DEIS should more clearly describe the distinction between regulatory permit approvals and environmental reviews. SEPA is a process, not a permit or approval. Although environmental review is integral to the permitting process, issuance of a final EIS does not constitute review or approval of the MPR.

3. The author uses the term “inform” repeatedly throughout the document as it relates to future permitting approvals, but the intent of “inform” is both unclear and undefined. The use of this term without a sufficient explanation of how a given point of analysis or study will guide a conclusion on a permit approval process makes the DEIS difficult to use. As stated above, environmental review of a proposal is a separate process from regulatory review. The DEIS needs to express the relationship between environmental discussion and permit review (including but not limited to the MPR) in a more useful and prescriptive manner. Over reliance on the term “inform” masks the need to express this relationship in clear, objective language.
4. Mitigation measures identified in Table 2.4 do not appear to be actionable as mitigation measures, but rather are comprised of a mix of statements, confirmation of compliance with existing laws/regulations, some specific and presumed binding conditions, and broad and unspecific generalizations. Mitigation measures are intended to be actionable items to reduce or eliminate the identified adverse environmental impact(s). See WAC 197-11-440(6)(c)(iii).
5. Sole access to the development is dependent upon approval of an access agreement with the US Forest Service. The MPR proposed 20 year buildout exceeds Mission Ridge’s current Land Use Agreement, which expires in 2033. The DEIS should discuss and evaluate the significance of securing, or failing to secure, an extension of the Land Use Agreement and the potential impact on the sole ingress/egress for the overall MPR.
6. The DEIS should note that all permits and approvals identified on pages FS-3 through FS-5 as occurring prior to Phase 1 shall be submitted to the County to become part of the MPR application. This will include any development agreement with the County for maintenance of the primary access road.
7. The density and open space calculations for the MPR seem to be using area outside of the established project boundary. All elements of the proposal, including open space, must be within the project boundary.
8. Pg 2-11: 2.3.2 states the DEIS “constitutes a comprehensive environmental review of potential impacts at full build out”. However, much of the EIS focus is directed only to those environmental issues identified in the scoping. Some environmental factors that may be reviewed at the MPR project level in compliance with existing critical areas regulations, including CCC Sections 11.77, 11.78, 11.80, 11.82, 11.84 and 11.86, are given only cursory treatment in the DEIS. No comprehensive analysis of both domestic water options, and both sanitary sewage disposal options.
9. Section 5.2.3.3 on page 5-12 indicates that Mission Ridge currently only owns enough water rights for build out of Phase 1. Water demand for Phases 2-5 would need to be supplied from another source. Similarly, existing power capacity is sufficient for Phase 1 and a portion of Phase 2. If water and power infrastructure are looped, and therefore must be sized at each phase for full buildout capacity, what (if any) additional impacts would result?
10. Discussion on pages 5-15 and 5-16 provides information regarding wastewater discharge requirements and flow for the development. According to Table 5.2-2 Phase 1, generating an estimated flow rate of 91,980 gpd could potentially be accommodated with on site sewage disposal systems. However, the anticipated wastewater flow at full buildout at 289,230 gpd would require multiple LOSS or a wastewater treatment plant (WWTP) to

meet the conditions. Discussions regarding WWTP state “if”, but if full buildout is achieved, it is likely that a WWTP would be required. More discussion of the impacts should be provided in regards to installation of infrastructure during the construction phase.

11. There is no mention of Forest Practices Application for all of the tree removal required for construction of the project.
12. Table ES-2 is missing permits and approvals required by Chelan County.
13. Although noted on page 4-74 that “The EIS is not intended to represent a conclusion by the County of conflict nor consistency with the relevant local plans and regulation” (Page 4-1), the bullet “Land Use”, and again on page 4-76, indicates that the proposal is consistent with local planning. It should be made clear that this proposal has not been deemed consistent with relevant plans and regulations. The MPR application will be reviewed as to its compliance with all development criteria after thorough review of the entire file of record, including all current or updated application materials.
14. The proposed mitigation measures on page 4-63 and 4-64 relative to the visual impacts both during construction and operation do not clearly describe how these measures will maintain the aesthetic character of the site. For example, one measure proposes to construct buildings complementary to the natural setting without providing details of their visual characteristics.
15. The WDFW and DNR land exchange must be resolved prior to the public hearing for the development, if part of the current proposal.