From: Mike Kaputa
To: Daniel Chang; Dan Haller
Subject: FW: Comments- DEIS, Mission Ridge Master Planned Resort Expansion (SEPA #202503692)
Date: Tuesday, October 21, 2025 4:42:18 PM
Attachments: image001.png
image002.png
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From: Johnson, Deborah L (DOH) <deborah.johnson@doh.wa.gov>
Sent: Tuesday, October 21, 2025 4:35 PM
To: Mike Kaputa <Mike.Kaputa@CO.CHELAN.WA.US>
Cc: Briscoe, Jason R (DOH) <Jason.Briscoe@doh.wa.gov>; Jones, Andrew (DOH) <andrew.jones@doh.wa.gov>; Boyde, Natasha P (DOH) <Natasha.Boyde@doh.wa.gov>; Miller, Sheri K (DOH) <sheri.miller@doh.wa.gov>; Freitag, John J (DOH) <John.Freitag@doh.wa.gov>; Staal, Hollis W (DOH) <Hollis.Staal@doh.wa.gov>; DOH EPH SEPA <SEPA.reviewteam@doh.wa.gov>
Subject: Comments- DEIS, Mission Ridge Master Planned Resort Expansion (SEPA #202503692)

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Hi Mike,

Thank you for the opportunity to review the DEIS for Mission Ridge Master Planned Resort Expansion (SEPA #202503692). We have the following comments:

Overall

The DEIS appears to be generally thorough & well thought out. The comments below are intended to further illuminate the DEIS discussion. We did not see any extraordinary deficiencies. The only gap I noticed leads me to suggest exploring the potential for eventual transit connection to the project.

Drinking Water

The DEIS states “The Applicant anticipates the primary source of potable water would be from the Chelan PUD Squilchuck Water System in addition to use, as feasible, of on-site groundwater wells.” Currently, there is no “Squilchuck Water System” as referenced in the DEIS. The active well/water system physically located at Squilchuck is the Scout-a-Vista camp (ID#76864). It was downgraded from a Group A to a Group B system in 2021. Its maximum service population is very small, peaking in summer. The DEIS mentions the camp but only in terms of running water lines; it didn’t appear the intent is to consolidate the Scout-a-Vista system. Going back in time, we have legacy records relating to three previous Squilchuck systems, which are all now inactive. (For those second two, there isn’t even source data; it says “historic” going back to the late 70s. This predates DOH as an agency & I make room for the possibility this is a duplication.)

SQUILLCHUCK STATE PARK	InAct	SP8457
SQUILCHUCK STATE PARK	InAct	5P850T
SQUILCHUCK STATE PARK	InAct	SP850W

The site is currently served by the Mission Ridge Ski Area Water System, ID#55335. This is a TNC (transient non-community) system. It has a single source; Mission Ridge Springs is an additional, currently inactive surface water source under this system that would require treatment to be put into service. The system is approved for five non-residential service connections. It supports an estimated peak population of just over 1,000 (January). For much of the year, it supports an estimated 15 people. By comparison, the DEIS estimates up to 4,000 visitors alone per day at peak or 1,000 non-peak (p. 4-23). Even considering the lower average, this obviously this creates a significant service gap. The DEIS refers not only to service from Chelan Co. PUD but also "expansion of water service the Mission Ridge public water system." This would involve at least a water system plan amendment, which we note is mentioned (as well as "infrastructure construction documents") in the DEIS.

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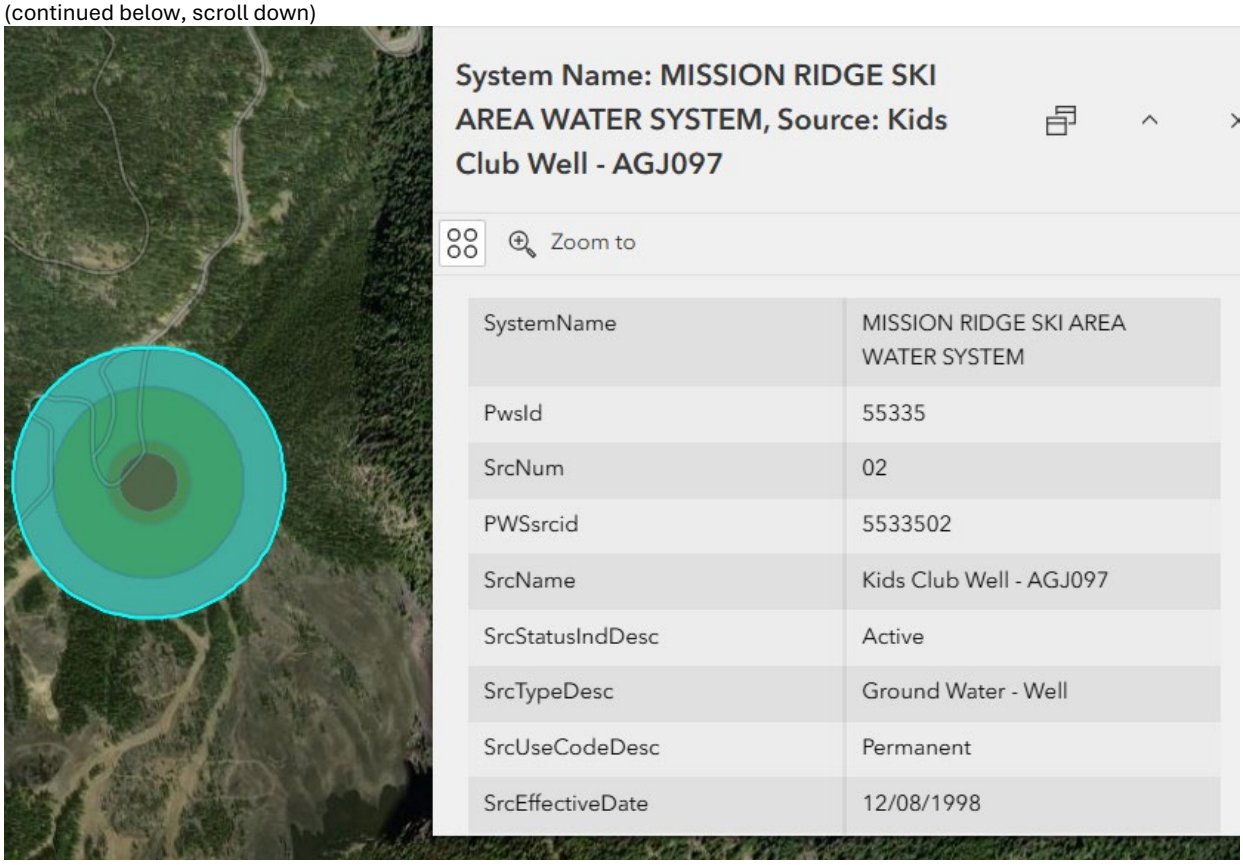

Source: https://maps.doh.wa.lcl/portal/apps/experiencebuilder/experience/?id=2cafbfffd540480d8a3e7368a9c40b2f#data_s=id%3AdataSource_2-1985828534c-layer-36-198581cc9eb-layer-32%3A1304

The DEIS states that "Existing Mission Ridge water right authorizations may be used to meet water demand up to 90 afy. The Applicant describes in their application that no new water rights are necessary to develop the Proposed Project, but that non-additive changes (i.e., no enlargement of authorized quantities) to existing water right authorizations would be needed (e.g., change purpose of use, place of use, point of withdrawal) to comply with RCW 90.03 and RCW 90.44. Actual available on-site groundwater supply will be determined after new wells are drilled and evaluated for productivity and water quality. A reconnaissance-level hydrogeological assessment (WNR, 2018 and 2019 (updated version)) has been completed to inform potential well siting, but final well drilling locations have not been determined." Any information over whether or not additional water rights will be needed or are available to support a new system, an expansion of the

existing Mission Ridge system, or both, including evaluation of impact on water availability within WRIA 40 overall, is under Ecology's purview.

There is an unusual reference to trucked-in water on p. 5-12 forming no adverse impact on water rights or supply. Typically, in terms of drinking water we would see trucked-in water used only in an emergency situation, for example if existing supply is interrupted by infrastructure failure or a contamination event. This particular passage mentions wells being temporarily out of service, but it also appears to tie this to supply if Ecology does not approve change applications. We do not expect that trucked-in water would be a sustainable approach to maintaining water supply outside of a service interruption. Noting "trucked-in water during construction" (p. 5-28), is this intended to be a sort of "service bridge" if taking down the existing Mission Ridge system temporarily to connect new wells?

Focusing for a moment on new well siting: The wellhead protection area (WHPA) associated with the existing source (shown above) is discussed on p. 5-11. Similarly, additional WHPAs would be established for any new sources that would overlay additional area. Fig. 5.2-2 depicts new well siting (yellow circles) but not additional WHPAs, only the existing one. The overall size of new WHPAs utilizing the calculated fixed radius approach would vary depending on well operating characteristics; a modeled approach is preferable & more predictive of where groundwater is moving. If there are any aspects of the proposed development that might be concerning in terms of source water proximity, that should be considered at the time of actual well siting to ensure planned uses don't conflict with source water protection interests. This includes thoughtful siting in relation to the OSSs/LOSSs, stormwater handling, hazardous materials storage, & area receiving surface application of reservoir water as manufactured snow. Any WHPAs would constitute critical aquifer recharge area subject to regulation under the County's critical areas ordinance (CCC 11.82.020(2)). Please note that depending on siting, there may be legal filings (covenants &/or easement(s)) involved in new source siting. These could be related to access, sanitary control area, or greater WHPA controls. These aren't a "required permit or approval" per se, as listed in the DEIS, but a similar type of requirement.

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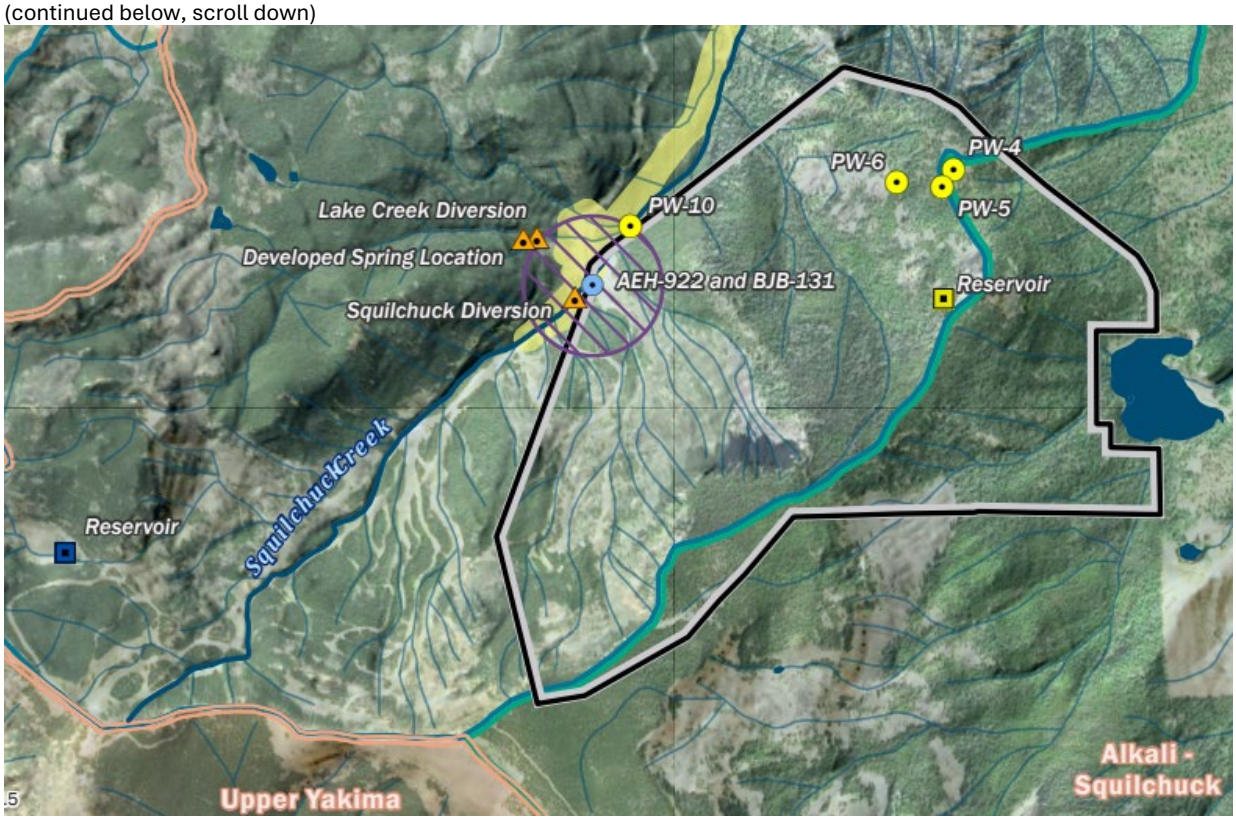

Source: SEP 2025 MISSION RIDGE DEIS_VOL II_ATTACHED FIGURES (3 of 4).pdf

The existing & proposed Mission Ridge developments are not within Chelan Co. PUD's established service area boundary, which stops to the south of Squilchuck (in blue below). The PUD's service to this area is not via a physical source located in the immediate vicinity. To extend service to the new development area, Chelan Co. PUD would need to amend its water

system plan to expand its service area. It isn't clear whether the ultimate intent is for the PUD to assume the existing Mission Ridge system (including water rights) as a system consolidation. We note that "intertie" is used on p. 5-115, which suggests the PUD will become another source to the existing system. The PUD is currently developing a water system plan update, which was due in 2024. We note that "plan expansion approval" is included in the pre-Phase 1 approvals listed in the DEIS. In terms of timing, it would be appropriate to integrate this into the pending plan update. We cannot offer extensive review, evaluation, or assurances on the efficacy of the work that has been completed outside of the plan review context. Please note that new source approval cannot proceed independently of the plan update. It's clear from the materials that the County, PUD, & developer have been working closely on this & we encourage you to continue doing so, as obviously water availability will be key in achieving the development goals.

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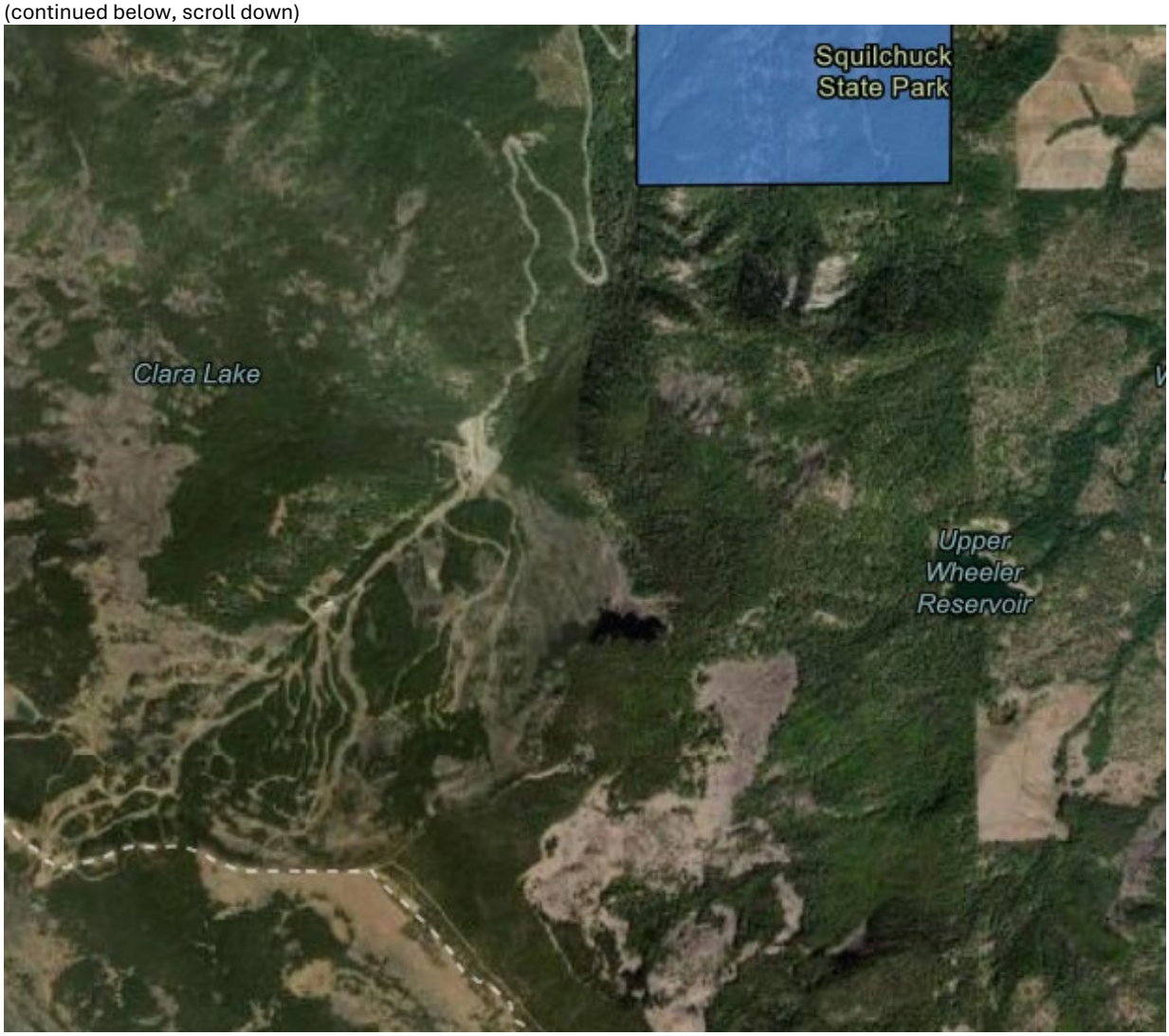

Source: https://maps.doh.wa.lcl/portal/apps/experiencebuilder/experience/?id=2cafbfffd540480d8a3e7368a9c40b2f

Our drinking water planner & engineer for your area (cc'd) are:
Natasha Boyde natasha.boyde@doh.wa.gov 564-233-9548
Sheri Miller sheri.miller@doh.wa.gov 509-407-7160

Non-Potable Water

Use of the reservoir is discussed in relation to making artificial snow. What other sources will be used for demands not requiring potable water? For example, irrigation of yards/landscaping associated with private homes & other uses. Will fire flow rely on the drinking water system or non-potable source(s)? The expanded reservoir is mentioned in the DEIS

several times in relation to wildfire, but we did not see that carried into the wildfire mitigation; plus, peak fire season would also be likely to be the time of year the reservoir is at its lowest level.

Since trucked-in water is framed as potable water above, it's worth noting that it seems most likely to be used in non-potable form during construction (dust control).

Wastewater

The DEIS evaluates OSS/LOSS usage & potentially "WWTP discharging to surface water in later project phases" (p. 5-14; specifies Squilchuck Creek on p. 5-31). Given the geography/hydrology of the area, we appreciate the expanded "gaze" associating wastewater treatment options with potential impacts on landslide, erosion, & seismic hazards. At the same time, we note the DEIS states those impacts can be only "partially mitigated for." As with drinking water, despite the considerable evaluative work contained in the DEIS, we cannot offer extensive review, evaluation, or assurances on the efficacy of the wastewater-related work that has been completed outside of the permit review context.

Our wastewater engineer for your area (cc'd) is:
Jason Briscoe jason.briscoe@doh.wa.gov 564-999-3546

Planning Scale

At full buildout, the project would include a total of 621 multifamily & 265 single-family dwelling units. At an estimated usage of 300 gpd, the homes along with cumulatively consume 265,800 gallons of water daily, or more than 97 million gallons each year. At 2.64 people per household (OFM 2020 intercensal base, unincorporated Chelan Co.) this creates a population center of over 2,300 people, given residents alone. (This is rounded to 3pph on p. 4-23, which results in a higher figure.) This is close to the current size of Leavenworth (2,615; OFM April 1 estimates). In addition are 80 employee beds, 57 hotel rooms, & 110,000 sf of commercial space as well as all the recreational uses. We note "Master Planned Resort Overlay" is included in the DEIS permit approvals needed, prior to Phase 1. With its statutorily required periodic comp plan update currently underway, Chelan Co. should incorporate at least prospective consideration of the necessary zoning changes (beginning p. 4-71) into this planning cycle, as phasing corresponds with the planning period. A couple of fundamental questions the County should consider is how future planning will encompass this new population center, along with the typical service & amenity demands that would be expected in association with such a population center, & the question of UGA extension as that seems likely to come up at some point.

Notification

We appreciate the time, effort & expense it took to have a hard copy of this DEIS sent to Jessica Todorovich, our agency chief of staff who had been serving as the interim Secretary of Health earlier this year. For future transmittals, it would be preferable to submit things electronically using our SEPA mailbox, which is our official contact point. All official agency contacts are listed here https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-lead-agency-contacts. Many of our staff are now permanently remote. While large documents like this exceed the size of email attachments, the notice will suffice; we can use the uploaded documents posted on the SEPA Register. For future notices on this particular project, though, please use the contacts in this email.
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Thank you for considering our comments. Please let me know if you have any questions or need additional information.

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Washington State Department of
HEALTH