

Wenatchee Heights Reclamation District
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Wenatchee Heights Reclamation District

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October 15, 2025

Chelan County Natural Resources

Attn: Mike Kaputa, Director

316 Washington Street, Suite 301

Wenatchee, WA 98801

**RE: Comments on Draft Environmental Impact Statement (EIS) –
Mission Ridge Master Planned Resort**

Dear Mr. Kaputa,

The Wenatchee Heights Reclamation District (“District”) appreciates the opportunity to provide comments on the Draft Environmental Impact Statement (EIS) for the Mission Ridge Master Planned Resort. As a neighboring property owner, the District manages and operates the 670 acre-foot Upper Wheeler Reservoir, a critical irrigation facility that provides water for agricultural uses in the Wenatchee Heights area. Because of the proximity of the proposed project to this reservoir and associated infrastructure, the District has significant concerns regarding the adequacy of the environmental review under the State Environmental Policy Act (SEPA), RCW 43.21C and WAC 197-11.

1. Analysis of Dam Construction and Potential Failure Impacts

Under WAC 197-11-080 and WAC 197-11-440(6)(c)(iii), the EIS must analyze impacts to critical infrastructure under all reasonably foreseeable catastrophic and non-catastrophic scenarios. Any proposed dam construction or storage facility located upstream of the District’s Upper Wheeler Reservoir must undergo a full failure-mode analysis, including breach, partial failure, and operational emergency scenarios. The EIS must specifically evaluate how such events would affect the District’s reservoir, diversion works, conveyance, and distribution systems. The District’s reservoir represents a substantial shareholder investment and serves critical agricultural needs and senior water rights. The EIS must not only identify potential impacts but also require enforceable mitigation measures and proponent-funded upgrades to District facilities to ensure their survivability in the event of a failure.

2. Wastewater Discharge, Septic Suitability, and Slope Stability

The Draft EIS acknowledges that soils in the project area are shallow, rocky, and highly variable, conditions that are poorly suited for conventional onsite septic systems. Discharge from such systems above the Upper Wheeler Reservoir poses a direct risk of contamination to the District's primary water storage facility. The District insists that all wastewater from the project area be collected and directed to a centralized treatment facility with final discharge away from the Upper Wheeler Reservoir and its tributary area. This requirement is necessary to comply with SEPA's mandate to identify and mitigate probable significant adverse environmental impacts (RCW 43.21C.031).

Additionally, the District is concerned about the unavoidable increase in the risk of landslides or slope failures resulting from increased infiltration due to wastewater disposal, stormwater, and additional snowmaking operations. These activities will alter groundwater conditions and slope stability in already challenging terrain. Considering that slope stability impacts cannot be fully mitigated through design alone, the District insists upon a detailed geotechnical investigation and stability analysis as part of this EIS. The existing terrain is likely marginally stable at best (static factor of safety of 1.5, seismic of 1.1), as supported by the numerous identified landslides in the Draft EIS and technical appendices. A defensible geotechnical evaluation must be based on subsurface exploration with numerous borings, coupled with a global stability analysis conducted by a professional geotechnical engineering firm with demonstrated experience in large-scale slope evaluations. Without such analysis, the EIS fails to meet SEPA's "hard look" standard for probable significant impacts.

3. Evaluation of Existing Water Rights

The Draft EIS assumes that "existing" water rights will be available and authorized by the Washington Department of Ecology for project use. This assumption is both misleading and incomplete. Irrigation water rights in the Squilchuck Basin are frequently subject to curtailment, particularly in low-flow years, and the reliability of supply is uncertain. SEPA requires analysis of cumulative and indirect effects (WAC 197-11-060(4)(d), WAC 197-11-792). The EIS must therefore evaluate the impacts of additional demand on existing irrigation users and disclose the risks to water availability rather than presuming approval by Ecology. Proceeding without this analysis undermines transparency and may constitute a failure to meet SEPA's substantive and procedural requirements.

4. Land Use in the Upper Wheeler Watershed

The proposal includes logging within the Upper Wheeler watershed, yet the Draft EIS contains no meaningful analysis of the resulting increase in

surface runoff, erosion, and sediment delivery into the Upper Wheeler Reservoir. Removal of forest cover in this sensitive watershed directly threatens water quality, reservoir storage capacity, and downstream infrastructure. Under WAC 197-11-440(6)(c)(ii), surface water quantity and quality impacts must be addressed.

Furthermore, the proposed expansion of winter recreation activities on lands immediately adjacent to the District's facilities raises concerns regarding trespassing, property damage, and increased liability exposure for the District. Increased recreational use in proximity to critical water infrastructure poses operational and legal risks that the EIS must evaluate and mitigate. Enforceable measures such as fencing, signage, monitoring, and patrols must be incorporated into the project proposal.

5. Secondary Access and Conservation Easement Conflict

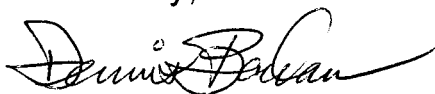
Option 1 for the proposed secondary access road would bisect lands permanently set aside for conservation as mitigation for the Wheeler Ridge LLC orchard expansion. This parcel is legally encumbered by a conservation easement, and additional disturbance or fragmentation is not permissible. Even if the road is designated for "emergency-only" use, the construction itself would constitute a permanent impact and diminish the conservation values of the easement. SEPA requires analysis of impacts to mitigation lands (WAC 197-11-792(2)(c)), and any action impairing the conservation easement would directly contravene prior mitigation commitments. This option must be eliminated from consideration in the Final EIS.

Conclusion

The District requests that the Final EIS address the above concerns in full and ensure that the project does not compromise the integrity of the Upper Wheeler Reservoir, the safety of the District's infrastructure, the reliability of irrigation supplies in the Squilchuck Basin, or the natural character of the Upper Stemilt basin. Without these revisions, the EIS risks being legally inadequate under SEPA.

Thank you for the opportunity to comment. The District requests to remain a party of record on this project and to receive notice of all further environmental review and decision-making related to the proposal.

Sincerely,



Dennis Berdan

Board Secretary/Treasurer

Wenatchee Heights Reclamation District