Conservation Northwest
Keeping the Northwest Wild

October 15, 2025

Mike Kaputa, Director
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SEPA Responsible Official
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RE: Draft EIS Mission Ridge Expansion Master Planned Resort

Dear Mr. Kaputa,

I am writing on behalf of Conservation Northwest and its 4,000 members to voice our concerns about the Draft Environmental Impact Statement for the Mission Ridge Expansion Master Planned Resort (DEIS). Conservation Northwest supports the No Action Alternative and opposes large-scale development in this region of the North Cascades. We could support an alternative to expand recreational opportunities for the public, but the proposal is a business development plan that will have unpredictable effects on the local public and environment. In this letter, I describe the consequences of the proposal to wildlife, habitat, and the people who enjoy them.

Wildfire Risk

Fire Ignitions

Wildfire risk will increase as human and vehicle traffic increases since most wildfires on National Forest and within Washington State start from human-caused ignitions (Forest Service; Washington Department of Natural Resources). While roads function as fuel breaks, they are also significant vectors for fire ignitions within forests (Ricotta et al., 2018). Increases in summer vehicle traffic would increase fire ignitions from vehicle accidents, sparking objects, and burning material (i.e. cigarette butts). The DEIS incorrectly states wildfire risk will decrease under the Preferred Alternative. It does not provide a study for this conclusion, only an infographic **(**Graphic 4.2-1, DEIS**)**. It argues the construction of a new fire station, construction of a new water reservoir, construction of snow-making facilities, and forest health treatments will all be implemented to increase suppression opportunities.

Forest Health

Construction will significantly alter the soils and hydrology of area downhill of the proposed site, leading to a shift in vegetation and forest sustainability. By diking and draining slopes for development and roads, some downhill forests would experience a sudden increase in soil moisture while others experience a sudden decrease in soil moisture. Sudden shifts in soil moisture are the greatest cause of root-rot disease in trees and can stress trees enough to make them vulnerable to other forest pathogens such as insects and mistletoe (Thies and Sturrock, 1985. This impact can be observed where a “temporary road” was constructed by the proposed developers from Mission

Ridge Ski Area east across the National Forest toward the proposed site of the ski resort. Multiple root-rot pockets have formed because of the road construction, and multiple insect species are taking advantage of the stressed trees below the road. We are concerned that the sudden shift in forest hydrology would cause a multi-decadal forest health issue downhill from the proposed ski resort, leading to a watershed-scale, high-risk wildfire scenario.

Fire Ecology

The DEIS does not adequately factor human-fire ecology into wildfire risk. The significant increase in human presence at the proposed site must be accommodated by an increase in fire suppression. The fine, flashy, and ladder fuels that catalyze small wildfire ignitions into severe, landscape-scale wildfires will grow as every small ignition is suppressed near the development. These fuels are naturally maintained at low levels every decade by naturally occurring wildfires ignited by dry lightning storms in summer. In addition, herbivory by wildlife such as small rodents, pikas, snowshoe hare, mule deer, and elk contribute significantly to the annual fuel consumption and resulting forest structure (Rouet-Leduc et al., 2021). The human activity proposed in all seasons will push these herbivores away from the proposed area to seek new habitat with less disturbance. An increase in human presence at the proposed development site will lead to an increase in fire suppression and a decrease in wildlife herbivory, causing high fuel loads for future wildfire events.

Forest Management

The role of fire ecology at the proposed site cannot be understated. The DEIS mentions hand thinning, chipping, and masticating treatments that have been implemented in the surrounding area and suggests these treatments would be implemented to reduce wildfire risk around the proposed site. However, it does not provide any evidence of a forest management plan or strategy, only references of treatments completed by other landowners. In some cases, these treatments are unique and unreplicable for a private landowner because they were accomplished using public funds, by a government agency, and/or during an unprecedented period of forest health funding from state and federal agencies. These treatments are necessary to maintain forest health and wildfire risk around property, but they would not be enough, and they would be extremely costly for a private landowner to complete. Hand thinning, chipping, and masticating are all expensive projects that do not produce marketable products and would require follow-up burning, smoke management planning, and permitting to finally eliminate fuels. On a high elevation, north aspect, the proposed site will grow trees and brush at faster rates than the landowner can keep up with it and the necessary noncommercial treatments to reduce fuel loads. Machinery and hand saws cannot remove the small fuels like tree seedlings, brush, or piles of stems that are eliminated by fire. The scale of forest and fire management necessary to ensure wildfire burns safely around the proposed development is large, expensive, and impractical.

Wildlife and Habitat

Wildlife Organizations

The analysis of effects on wildlife and habitat is broad and cursory. The data used in planning is pulled from models and other agency databases, indicating insufficient information from local input, Tribal knowledge, and field surveys. It is unclear if local stakeholders from wildlife organizations were consulted at all during the development of the DEIS. Mission Ridge is a diverse

intersection of forest and shrub-steppe habitats that host a wide variety of species, many of which are not mentioned in the analysis. Please consult with the North Central Washington Audubon Society, Wenatchee Valley Mule Deer Foundation, Backcountry Hunters and Anglers, Rocky Mountain Elk Foundation, the Sportsman's Alliance, the Xerces Society, Conservation Northwest, and other local or statewide wildlife organizations to gather more information about effects on wildlife.

Culturally Significant Species

Mission Ridge is home to one of the largest Rocky Mountain elk herds in Washington, as well as a major migratory mule deer herd. The unique interface of forest and shrub-steppe creates a patchy forest with openings for forage and cover for shelter. The presence of shrub-steppe at high elevations provides ungulates with forage and security habitat next to perennial sources of water. The proposal eliminates habitat features used by elk and mule deer and significantly impacts their movement across the ridge. The proposed noise, light, traffic, and human presence will push ungulates to narrow corridors where movement is bottlenecked, increasing the chances wildlife will be stressed, killed, or malnourished. Please describe how ungulates will be affected by increases in human traffic, vehicle traffic, development, light pollution, and noise pollution.

Hunters pursue elk and mule deer for food, hide, and recreation. Hunters have a long history of utilizing the proposed area to hunt game animals, including dusky grouse and black bear. Nearby public land purchases were purchased using funds raised by hunters for hunting opportunities. While WDFW (Priority Habitats and Species) data was used to analyze elk and mule deer ranges, this data is only a starting point based on studies to date. It does not provide a complete picture of all the habitat elk and mule deer utilize. Elk wallows, game trails and scat, antler rubs, and ungulate beds litter the north face of the National Forest adjacent to the proposal. The entire area is used for rearing fawns and calves in spring, foraging in summer, rutting in fall, and even cover in winter for the biggest bulls and bucks. Brief field surveys, discussions with local hunters, and engagement with Tribal biologists all reveal the proposed site is a major habitat corridor for elk and mule deer, contrary to the modelled analysis in the DEIS. Please provide more information about how elk and mule deer use the proposed site.

Recreation Impacts on Wildlife

Conservation Northwest's 2022 report, Recreation and Wildlife in Washington: Considerations for Conservation (Machowicz et al., 2022), provides statewide synthesis of over 100 peer-reviewed studies on how recreation affects wildlife. The report highlights ski area development, roads, and motorized or high-intensity recreation displace sensitive alpine species, including deer, elk and other animals. Elk and mule deer alter foraging behavior, abandon calving sites, and experience population-level stress when recreation intensity increases. The report recommends maintaining seasonal closures, preserving undisturbed refugia during winter and nighttime hours, and routing recreation away from escape terrain and alpine cliffs that also provide habitat for raptors and pika. These findings underscore that the proposed expansion would occur in an area of high ecological sensitivity where recreation disturbance has well-documented and predictable consequences. We encourage the County and project proponents to incorporate these science-based recommendations and to adopt the No Action Alternative until wildlife coexistence strategies consistent with Conservation Northwest's findings are developed.

Rare and Vulnerable Species

The DEIS excludes several species and habitats from analysis that Conservation Northwest has confirmed are present at the proposed site. Wildlife species from mature forest habitats such as American goshawk and Pacific marten are excluded from serious consideration. We repeatedly detected an adult goshawk from the nesting to fledging period on the adjacent National Forest land in 2025, indicating the presence of a nest on the north face of the proposal. Pacific marten tracks have been detected throughout the proposed area at higher elevation sites by winter skiers. We performed several breeding bird surveys on the National Forest adjacent to the proposal and detected additional bird species that prefer mature forest habitat, including Pacific wren, Cooper's hawk, and Williamson's sapsucker. Please include more information about the species of wildlife that will be affected in mature forest habitat.

Another unique habitat that requires more attention in the analysis is the mix of talus and cliffs that dominate steep areas of the proposal. These open habitats provide year-round homes for American pika colonies and nests for golden eagles and peregrine falcons. Rocky slopes provide cover and support meadows with diverse forbs, sedges, and grasses. Bird and insect pollinators find refuge in summer and rest during migration in meadows that stay green until autumn due to the cool, perennial flow of water underneath talus and seeping from cliffs. Due to the high elevation and proximity of Mission Ridge to the Columbia Basin, thousands of hawks use the loft of rising thermals as they migrate annually. The Eastside Cascades provides a major corridor for raptor migration along the Pacific Flyway, flying from one major ridge to another. The Preferred Alternative would destroy unique talus and cliff habitats currently used by pika colonies, pollinators, and raptors, as well as alter the character of rich meadow communities. Please analyze how wildlife species will be affected by permanently altering the structure and hydrology of talus and cliff habitats.

Landscape Effects

Aquatic Impacts

It is unclear how the proposal would mitigate downstream impacts to aquatic ecosystems. The proposal includes creating additional snow and constructing a water reservoir but does not mention how downstream water quantity or quality may be affected. The proposed development and construction would lead to an increase in sediment and pollutants, negatively impacting water quality for agriculture, homes, salmonid fish species, and the health of the Columbia River. Please describe the downstream impacts to water users and the environment.

Vehicle Traffic

The DEIS should include an analysis of effects of vehicle traffic on wildlife. The proposed increase in traffic is significant and will have the greatest effects on breeding birds, low mobility species, small animals, and ungulates. Noise pollution from vehicle traffic will disturb some bird species enough to change breeding and nesting behavior, and bird songs will have to compete over the noise of traffic. Vehicles will likely hit and kill a disproportionate amount of wildlife such as rodents, mustelids, birds, mule deer, reptiles, and amphibians. Please describe the effect vehicle traffic would have on wildlife.

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Light Pollution

The proposed development will increase light pollution locally as well as for the entire Eastside Cascades. The effects of the proposed light pollution on wildlife is unclear and extremely broad in the DEIS and should consider how prominent Mission Ridge is amongst the entire Eastside Cascades of Washington. While light pollution for humans may increase from Mission Ridge to the Wenatchee Valley, it will be more visible for migratory bees, butterflies, hummingbirds, ducks geese, sandhill cranes, and raptors that approach Mission Ridge from the sky. The DEIS references a project to mitigate light pollution, but it does not say what would be required of the developers. Please include more information about the effects of light pollution on humans, birds, and insects.

Land Use

The DEIS incorrectly claims there is direction for WDFW to sell land in Section 25 near the proposed development to the Washington Department of Natural Resources. On Page 4-67, the DEIS states "In 2020, the Washington state legislature directed WDFW to explore a land exchange 'for near and long-term facility replacement and expansion of the mission ridge ski and board resort' (Engrossed Substitute Senate Bill 6168; effective date April 3, 2020)." This quote, or at least the section provided, has been completely taken out of context by the authors of the DEIS. Engrossed Substitute Senate Bill 6168 (effective date April 3, 2020) actually states the following, in full context:

> "(50)(b) $20,000 of the general fund—state appropriation for fiscal year 2021 is provided solely for the department to provide to the department of fish and wildlife to complete technical studies, assessments, environmental review, and due diligence for lands included in any potential exchange and for project review for near-and long-term facility replacement and expansion of the mission ridge ski and board resort."

The DEIS has completely changed the context of the statement by only including a portion of the last sentence. With more information, it is clear there is no strict direction for WDFW to sell land to DNR or any party. There are directions to *assess and review* WDFW land for the *potential* exchange of land. This detail about WDFW land exchanges is extremely misleading, factually incorrect, and does not indicate whether there is more to the referenced statement. Please remove this unnecessary detail from the DEIS until a decision has been made to exchange land.

Until Section 25 of WDFW land is fully included in a proposal to expand the ski area or resort, with WDFW approval of proposed actions on WDFW land, this DEIS should not discuss future or potential business plans on that land ownership. To the reader, it is sometimes confusing whether the DEIS only covers the proposal on private land, or if it includes adjacent state and federal land. Including public lands in a private business development plan is inappropriate until a decision by the land manager has been reached.

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Thank you for the opportunity to provide feedback and comments on the Draft Environmental Impact Statement of the Mission Ridge Ski Expansion Master Planned Resort. We look forward to more detail about effects on wildlife and habitat in the final environmental impact statement. If any contracted professionals, Chelan County staff, or other folks would like to discuss any items in greater detail or review them in the field together, we would be happy to meet.

Sincerely,

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References

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