



October 21, 2025

Mike Kaputa, Director
VIA EMAIL: missionridgeeis@outlook.com
Chelan County, Department of Natural Resources
411 Washington St, Suite 201
Wenatchee, WA 98801

RE: Draft EIS Mission Ridge Expansion Master Planned Resort

Dear Mike Kaputa,

This letter serves as the comments of Tamarack Saddle, LLC (“Mission Ridge”) to Chelan County’s DEIS for the Mission Ridge expansion project (the “Proposed Project”). The multiple years of environmental review conducted by the County is more than sufficient, and we are generally satisfied with the content of the analysis in the DEIS. However, we disagree with some of the conclusions reached, and they should be revised in the Final EIS.

A. Leavenworth Comparisons.

Before addressing specific components of the DEIS, we would like to address the deliberately misleading information the “Friends” of Mission Ridge (“FOMR”) have been sharing with the public because we are concerned the misinformation may influence the public comments you are receiving. FOMR have been relentlessly misinforming the public that the Mission Ridge expansion is comparable in size and scope to the City of Leavenworth. The County should take care to recognize when this misinformation has impacted public comments to distinguish it from the reality of the Proposed Project.

FOMR has been informing the public that the 4,000 person peak winter capacity of the expansion is double the resident population of Leavenworth. However, an apples to apples comparison of capacity highlights the extraordinary differences between the City of Leavenworth and the Mission Ridge resort expansion. For example, while the Proposed Project includes a single resort lodge with 57 rooms, Leavenworth has 1,238 hotel rooms.¹ Similarly, while Mission Ridge proposes 265 single family homes, Leavenworth had more than 800 single family homes as of 2020.² In terms of visitors, Mission Ridge is anticipating approximately 250,000 new visitors annually, while Leavenworth has approximately 3.4 million visitors annually.³ Finally, more than 3,200 people are employed in Leavenworth—nearly the full capacity of Mission Ridge in the winter.⁴ It is grossly misleading to suggest the Proposed Project is comparable in any way to the City of Leavenworth.

While there are many other examples of FOMR misleading the public, we will focus the remainder of this comment letter on the few adjustments to the DEIS that we believe are necessary.

B. The DEIS incorrectly concludes the Project poses probable significant adverse impacts on the environment despite proposed mitigation.

Because an EIS is subject to the “rule of reason,” only a reasonably thorough discussion of the significant aspects of the probable environmental consequences is required. The purpose is simply to facilitate the decision-making process. Accordingly, an EIS doesn’t need to list every remote, speculative, or possible effect or alternative, nor evaluate every

¹ Leavenworth Chamber of Commerce 2025 Economic & Visitor Profile, at page 3.
<https://www.leavenworthchamber.org/s/2025-Economic-Profile-Final-Print.pdf>

² Leavenworth Housing Needs Assessment 2020, at pages 27 – 30.
<https://cityofleavenworth.com/wp-content/uploads/2021/12/Leavenworth-HAP-App-C-Needs-Assessment-April-2021.pdf>

³ Leavenworth Chamber of Commerce 2023 Economic & Visitor Profile, at page 3.

⁴ Leavenworth Chamber of Commerce 2023 Economic & Visitor Profile, at page 22

scenario or conduct a worst case analysis.⁵ In addition, where existing regulations adequately address a proposed project's probable specific adverse environmental impacts, no further mitigation should be imposed.⁶ When mitigation is imposed, each mitigation measure must be specifically linked to and proportionate to the development's actual impact.

The DEIS incorrectly concludes in several places that the Project poses probable significant adverse impacts on the environment despite proposed mitigation, so it is also worth briefly discussing the concepts of "probable," "significant," and "mitigation" under SEPA. The term "probable" is used in the regulations to distinguish likely impacts from those that merely have a possibility of occurring, but are remote or speculative.⁷ The term "significant" means a reasonable likelihood of more than a moderate adverse impact on environmental quality.⁸ Mitigation can mean minimizing impacts by limiting the degree or magnitude of the action and its implementation, by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts.⁹ Thus, when mitigation reduces impacts so that there is no longer a reasonable likelihood that the project will cause more than a moderate adverse impact, the impact is no longer significant.

1. Section 4.1 should be revised to state that the geologic hazards from construction or operation of the Proposed Project can be mitigated below a level of probable significance.

While the project area includes steep slopes, as any ski resort would, the primary development will occur on a gentle sloping area suitable for development. It should be noted that the primary references to mapped landslide areas in the DEIS are not referring to recent landslide areas. For example, the descriptions and mapping of "rotated slump blocks" and

⁵ *East County Reclamation Co. v. Bjornsen*, 125 Wn. App. 432, 442 n. 9, 105 P.3d 94 (2005).

⁶ RCW 43.21C.240.

⁷ WAC 197-11-060(4); WAC 197-11-782.

⁸ WAC 197-11-794.

⁹ WAC 197-11-768.

“mass wasting deposits,” do not refer to recent movement. These descriptions relate to landslide events from the Pleistocene era (i.e., the Ice Age) “under notably different geologic and climactic conditions.” GN Northern concluded that this area appears relatively stable under modern conditions.

Chelan County has detailed critical areas regulations that ensure development is appropriately mitigated to address landslide hazards. Specifically, Chelan County adopted a Geologically Hazardous Areas Overlay District code in CCC 11.86, that is designed to ensure all projects in geologically hazardous areas undergo thorough review, with site specific mitigation imposed, to protect public health and safety. Compliance with the County’s adopted standards for all other development in geologically hazardous areas should be sufficient. However, the proposed project includes mitigation above and beyond what is required by the County Code, and thus is designed to provide greater mitigation and protection from geological hazards than any other project that would ordinarily occur in steep slope or landslide hazard areas in Chelan County. The required mitigation will ensure the project is not creating probable significant adverse impacts on landslide hazards or other geologic risks. Under these circumstances, it is a mistake for the County to conclude the Project’s impacts cannot be mitigated below a level considered to be both probable and significantly adverse.

2. Section 4.2 should be revised to state that the fire risks from construction or operation of the Proposed Project can be mitigated such that the Project would not have probable significant adverse impacts on the environment.

The DEIS takes a unique approach to fire related issues. “Fire” is not one of the elements of the environment to be reviewed under SEPA. (see WAC 197-11-444). However, the potential for a project to cause a fire that harms elements of the natural environment, or the risks of harm the project may pose to the built environment, is subject to review. While there is inherent wildfire risk in the project area (and most of Chelan County), the extensive

mitigation proposed for the Project ensures that it will not pose probable significant adverse fire related impacts on the natural and/or built environment.

In thinking about this issue, it is important to consider the “existing environment.” This requires establishing “baseline environmental data on the existing environment” in order to “identify and describe the extent of a proposal’s environmental impacts.”¹⁰ Under this framework, “existing environmental” should be limited to the elements of the environment as they exist at the time of SEPA review of the project’s impacts. That is the “baseline environmental data” against which short and long, direct and indirect impacts of a project are evaluated.

With this in mind, being located in Chelan County, Mission Ridge faces an inherent risk of wildfire. While that is the existing environment for SEPA purposes, it must be taken seriously. Therefore, when planning Mission Ridge’s expansion, developing a fire resilient community that would be safe for our family, friends, and neighbors was a one of our primary goals. We have communicated with others in our industry, our local career fire protection experts, and hired an experienced fire protection engineer to shape our plans. The result is a planned community designed to minimize the risk of fire originating within the project, and the risk of wildfire from outside the project poses to the project, our guests, employees, and the neighborhoods down slope from Mission Ridge. Our efforts can primarily be categorized as falling into five categories, each addressed below.

i. Vegetation Management.

The Proposed Project mitigation includes the creation of fuel breaks, and ongoing forest thinning, intended to reduce the rate of fire spread, and the intensity of any wildfire,

¹⁰ RICHARD L. SETTLE, THE WASHINGTON STATE ENVIRONMENTAL POLICY ACT: A LEGAL AND POLICY ANALYSIS § 14.01[2][a] at 14-57 (2021).

which aids in the ability to control and/or suppress any wildfire. More specifically, a 200 foot wide shaded canopy fuel break is intended to protect the project area, and FireWise recommendations will be followed within 200 feet of all homes/structures, with additional vegetation treatment within 100 feet of roads and driveways. This mitigation will be ongoing and will create a healthy fire resilient forest, and create defensible space around roads and structures to improve the safety within the project area and communities downslope from Mission Ridge.

ii. Use of Fire Resistant Materials in Construction.

Mission Ridge is committed to using fire resistant materials throughout the Proposed Project, which reduces the risk wildfire poses to visitors and residents, and also reduces the risk of fires originating from within the project area.

iii. Early Detection and Warning.

Mission Ridge plans for a strong early detection and warning system, unlike anything required elsewhere in the County. Mission Ridge will not simply rely on standard smoke detectors, and instead will require monitored fire alarm systems be installed in every dwelling unit. Significantly, Mission Ridge plans to have a state of the art exterior flame detection system that can identify fire starts within the project area, and within nearby forest outside of the Project Area. In addition to facilitating an immediate fire suppression response, the detection system will be coupled with audible warning sirens to immediately warn visitors, and to assist in accomplishing early evacuation when needed.

iv. Robust Fire Protection and Suppression.

Mission Ridge proposes to go beyond ordinary standards for fire protection and suppression. Fire hydrants, sprinkler systems, and fire extinguishers will be easily accessible and used throughout the development. More significantly, Mission Ridge will construct, equip,

and staff a fire station on site. This will allow for fast emergency response and active fire suppression in the event of any new fire.

Additionally, Mission Ridge has unique resources in the form of snowmaking infrastructure that is capable of saturating the air and raising the relative humidity of the project area. This is similar to the exterior sprinkler system Holden Village uses elsewhere in Chelan County to create a humidity dome to protect their isolated community from wildfire that has no emergency access.¹¹ Our more powerful snowmaking and water infrastructure will provide even greater protection for Mission Ridge.

v. *Community Planning and Education.*

The Mission Ridge fire plan will be updated regularly, and Mission Ridge will post clear signage and provide education materials regarding fire risks and evacuation routes. Each dwelling will be provided with an emergency guide addressing individual preparedness. We will establish a FireWise community board, hold workshops for residents on wildfire issues and preparedness, and have continual engagement with residents and visitors regarding fire safety. We will also continually update and share our Crisis Action Plan to address wildfire events.

vi. *Emergency Access.*

Ideally, a project will have two avenues of ingress/egress, and there is no question that multiple avenues for ingress/egress are better than one—but they are not required when additional access would be impractical and other mitigation can be provided. Further, having single roads in/out of an area is a common circumstance throughout the mountainous terrain

¹¹ Riggs, Dee. "A green oasis: Holden Village survives Wolverine fire." *The Wenatchee World*, Oct. 5, 2015. https://www.wenatcheeworld.com/news/local/a-green-oasis-holden-village-survives-wolverine-fire/article_2f2c826d-2311-5a69-ace2-897d57978dc6.html

of Chelan County (e.g. Icicle Creek, Entiat River Rd, and Holden Village) and is the same circumstance faced by many large ski resorts (e.g. Crystal Mountain, Mt. Baker).

Five alternative access points were evaluated in the DEIS, but none were practical. All five are impractical because they require the construction of new roads across property that is not owned or controlled by either Mission Ridge or the County. They are also impractical given the massive undertaking necessary to construct several miles of new roadway through mountainous forested terrain, greatly increasing the environmental impacts of the Project.

In lieu of additional access, Mission Ridge proposes the ultimate form of mitigation with respect to emergency access by committing to building, equipping, and staffing a fire station at the Project. In other words, the Project will not be dependent on emergency services arriving from outside the Project via Squilchuck Rd, or any of the impractical alternatives that were considered in the DEIS.

Opponents of the Project have argued that the County should require additional access due to the risk of a road closure on Squilchuck Rd in the event of an emergency. However, providing secondary access does not actually address their stated concern because secondary access for projects is achieved by providing additional access back to roads in the vicinity of the planned project. In this case, that means most likely constructing additional access to loop back to Squilchuck Rd, eliminating any benefit of the second access point if there is a blockage anywhere along Squilchuck Rd downhill from the current nearest intersection of Forest Ridge Dr.

Aside from the fact that secondary access does not eliminate the possibility of road closures on Squilchuck Rd, the issue is also one of low probability. The County's obligation under SEPA is to evaluate probable significant adverse impacts, and not solve for every hypothetical harm. As discussed above, the term probable is used to distinguish likely impacts

from those that merely have a possibility of occurring, but are remote or speculative.¹² The County is not required to evaluate the improbable scenario where Squilchuck Rd is fully blocked at the same exact moment as a large scale emergency. Despite the low probability of that circumstance, Mission Ridge has proposed mitigation to address such unlikely scenarios as well. In addition to having a full time fire station at the Project, Mission Ridge is planning for Temporary Fire Refuge Areas, utilizing existing and new large surface parking areas or other pre-identified open space locations with reduced exposure to flames and heat, where persons and vehicles can gather safely in the unlikely event that an evacuation order coincides with a road blockage, until the blockage is resolved and first responders indicate evacuation is safe to proceed.

Mission Ridge has proposed extraordinary mitigation to address the fire risks similarly faced by developments throughout Chelan County. The mitigation goes far beyond anything required of other developers in the County. The result is a community intentionally designed with fire resiliency and safety in mind. The combination of early detection and warning systems, onsite firefighting crews, ongoing vegetation management, use of fire resistant materials, and the creation of Temporary Safe Refuge Areas mitigates the potential impacts of the project on the natural environment with respect to fire. Additionally, the same mitigation substantially reduces the risk the project poses to the built environment, especially all communities downslope of Mission Ridge. More specifically, under the No Action Alternative, the area around the Proposed Project will remain densely forested and vulnerable to wildfire, with no meaningful buffer to the communities downslope. Under the Proposed Project, the

¹² “The mandate of SEPA does not require that every remote and speculative consequence of an action be included in the EIS. The adequacy of an EIS must be judged by application of the rule of reason.” *Chaney v. City of Montlake Terrace*, 87 Wn.2d 338, 344, 552 P.2d 184 (1976). “A reasonably thorough discussion of the significant aspects of the probable environmental consequences is all that is required by an EIS.” *Id.*

downslope communities will benefit from the construction of a 200 foot wide fuel break, ongoing vegetation management, early detection and warning systems, and a fully staffed fire station in the mountains above their homes. There should be no question that the DEIS must be revised to state that the Proposed Project, as mitigated, would not have probable significant adverse impacts on the natural or built environments with respect to fire risk. In fact, it reduces the inherent risk posed by the No Action Alternative for the benefit of the broader community.

3. Section 4.3 should be revised to conclude that expanding the existing ski area does not create probable significant adverse impacts with respect to light and glare.

Visual changes necessarily occur with every project. That does not mean that the changes must represent probable significant adverse impacts. We ask that the County keep in mind that under the No Action Alternative, there will continue to be a ski resort on site with night skiing. The visual impact of expanding the existing resort is not significant as is apparent by the images depicting visual changes that are anticipated. There is barely a discernable difference between the light and glare under the No Action Alternative as compared to the Proposed Project. Please revise the DEIS to conclude there is no probable significant adverse impact with respect to light and glare.

4. Section 4.4 should be revised to conclude that while the Mission Ridge project would result in changes in the overall character of the Mission Ridge area, it would not create probable significant adverse impacts with respect to land use.

The “Key Findings” for Section 4.4. states that the proposed project would change the overall character of the area but that “these changes are permissible under Chelan County Code.” The conclusion that the project will have significant and unavoidable adverse impacts does not follow from the findings. If permissible under the code, and if consistent with

Comprehensive Plans (including local recreation plan and community vision plan), then its impacts on the use of land cannot be “adverse.”

Indeed, any MPR of more than a very modest size will result in some change to an area, presumably the County would not have adopted CCC 11.89 if it considered such changes to constitute significant and unavoidable adverse impacts. In this case, the DEIS concludes that: “[T]he Proposed Project and utility improvements would ... be consistent with applicable plans and regulations, would likely not conflict with surrounding land uses, and are not located on any currently productive forestlands.”¹³ The DEIS also concludes that compliance with the MPR code will result in a project that will maintain rural character while allowing development to take advantage of natural amenities. What is clear based on this review is that the current conclusions in Section 4.4.3 and 4.4.4 of a significant adverse impact do not follow from the findings and analysis, and therefore should be revised.

C. The DEIS Should Clarify that the ADT Used in the Traffic Impact Analysis Was Based on Assumptions that Overstate Actual Anticipated Traffic.

The DEIS appropriately notes that the project as proposed does not have any probable significant adverse impacts on traffic. However, the final EIS should clarify that the project does not actually anticipate an average of 10k vehicle trips per day to and from the project. The average daily trip (ADT) count used in our traffic impact analysis grossly overestimates actually anticipated traffic to provide the County with assurance that level of service standards can be met even on the heaviest traffic days. However, FOMR is misleadingly pushing that number in its public outreach to oppose the project, suggesting it is an actual estimation of daily traffic. FOMR’s misinformation campaign may impact public perceptions about the project and thus influence the public comments the County receives.

¹³ DEIS p. 4-79.

As a reminder, ADT is a term used in traffic analysis and refers to the average number of daily vehicle trips to and from a property. The aggregate trips to and from a project are then used in traffic analysis to help gauge the impacts of new trip generation on surrounding roads. Typically, a traffic engineer will assign an ADT number per unit in a development based on the type of unit. For example, the Institute of Transportation Engineers' (ITE) *Trip Generation Manual* indicates an ADT of 9.43 for single family homes. (see Appendix I to DEIS). That number might make sense for evaluating a typical subdivision where vehicle trips occur throughout the day as a family goes to school, work, church, sports activities, the grocery store, etc. However, the Mission Ridge expansion is not a typical subdivision. Mission Ridge is a destination resort where employees and visitors alike will often make a single trip in the morning to arrive at Mission Ridge, and once in the afternoon or evening after a day of skiing. After the expansion, that pattern will continue for many visitors. However, many other visitors and employees are expected to stay overnight at Mission Ridge after the expansion. Overnight visitors are expected to commonly arrive on a Thursday or Friday, and then leave on Sunday or Monday after a long day of skiing. There may be occasional trips into Wenatchee over the weekend, but under no circumstance do we anticipate 9 trips a day to/from Wenatchee for each home proposed for the project when families are at Mission Ridge for the purpose of skiing or other day long recreation.

It may be helpful to recall how we arrived at 10K ADT for the project during traffic impact analysis. The project is expected to have greatly varying traffic throughout the year. Traffic will be heaviest during peak winter ski season, slower during spring and fall, and likely lowest in mid to late summer when onsite activities slow, burn bans are in place, summer heat impacts outdoor activities, and potential summer smoke deters visitors from outdoor mountain recreation. Further, throughout the year, traffic at the destination resort is expected

to be highest on weekends and lowest mid-week. To ensure traffic standards will be met, it is important to evaluate traffic during the busiest period, not during the off season. Thus, it was decided that the analysis should not only include ADT for the units being constructed, but to also assign ADT to the additional ski capacity to represent peak winter conditions. We had initial traffic analysis performed in 2018 with this in mind, which calculated ADT for each of the homes, plus the ski resort capacity.

Notably, this 2018 analysis treated the majority of residential units as “recreational homes,” because the ITE description of the category “most appropriately describes the location and setting of the residential units.” (Appendix I of DEIS, page 4 of 2018 TIA). Rather than assigning 9.43 ADT of typical single family homes, ITE suggests 3.47 ADT for recreational properties, which seems far more realistic for this destination resort. However, our initial traffic analysis still treated 25% of the homes as full-time resident homes rather than recreational properties “to provide a more conservative (high) estimate for trip generation calculation purposes.” (Appendix I of DEIS, page 4 of 2018 TIA). While we tried to accurately estimate trip counts, but err on the side of overestimating, the County directed us to overestimate to an even greater degree. The County wanted trip generation to be calculated as though every residential unit was fully occupied by full time residents. Although the ski resort expansion is plainly intended to be a resort community comprised of recreational properties, we acquiesced to the County’s request and modified the traffic analysis to evaluate the Proposed Project as though it was at full capacity, and entirely occupied by full time residents, in all subsequent traffic analysis, beginning with our 2019 report. The result is approximately 10k ADT for the project for the purpose of performing traffic impact analysis. The overestimation may be helpful in guaranteeing the project will meet all traffic standards during peak periods, but grossly overestimates actual anticipated traffic.

Further, in addition to requiring the resort project be analyzed as a full time resident community, the County also allocated 100% of the ADT to roads in the Wenatchee area to represent the dispersal of the trips. This means that for the purpose of traffic analysis, the County assumed that each and every trip to/from a unit in the Project will be up or down the mountain. The County made no allocation for local trips within the project area. For example, rather than assume some of the trips would be to the ski lodge or the local market, the County assumed that all trips were back into Wenatchee.

The effect of the County's directions to Mission Ridge in calculating ADT, and then allocating 100% of the ADT to Wenatchee, results in a grossly excessive estimation of actual traffic up and down the mountain. The over estimation is useful when it is used to ensure levels of service standards for traffic will be met because it should eliminate any traffic concerns. However, the over estimation should not be allowed to spill into other areas of analysis as though it is a true traffic estimation. FOMR have grabbed the 10k ADT number dictated by the County's desired approach to traffic counts, and is using the figure in a disinformation campaign to frighten the public, and influence public comments. For example, FOMR represents to the public that the 10k ADT used in the peak traffic count analysis as the true daily estimate for the project and compares it with actual traffic counts on US 2 over Stevens Pass, which has a true traffic account of 5,052 vehicles averaged per day annually. (WSDOT Traffic Count Data, 2021, for Hwy-2 near Yodelin Place intersection). In other words, FOMR has been telling the public that the project is expected to add twice as many vehicles per day to Squilchuck Rd as one of only three state highways that connect the east and west sides of the state; connecting the Seattle area with Stevens Pass ski area, Lake Wenatchee, Leavenworth, Plain, Cashmere, Wenatchee, Mission Ridge, Chelan, etc. The assertion that Mission Ridge's traffic will come remotely close to US 2 is absurd—and further highlights the

excessive nature of the 10k ADT to begin with. Mission Ridge is anticipated to have additional capacity for 4,000 persons if all units are fully occupied, along with full occupancy on the ski lifts. The majority of those persons are expected to arrive in multi-occupant vehicles, for a total closer to 2,000 vehicles a day when at full capacity on a peak winter day. Some of those vehicles will not travel up and down the mountain each day as they will be staying at the destination resort, but it is reasonable for traffic analysis purposes to assume each of the vehicles makes a trip up and a trip down the mountain each day. This means traffic to be allocated to roads within Wenatchee during peak winter weekends is more likely 2k – 4k trips (less than average traffic on U.S. 2)—not 10k trips.

This final point on the likely actual trip counts is why we have proposed conducting further traffic analysis using actual trip counts for later phases. Mission Ridge is willing to accept the overestimation of trips for initial traffic analysis and for some intersections that show a likely need for improvement. However, for intersections that just barely show a level of service concern in late phases using the gross overestimation of traffic, actual traffic counts that can more accurately determine actual need makes much more sense. Therefore, we ask that you maintain the existing conclusion that there are no probable significant adverse impacts for traffic, and allow for additional traffic study during later stages to address certain intersections. However, we do ask that the final EIS clarify the origin and meaning of the 10k ADT figure used in traffic analysis to avoid misleading the public as to the true traffic impact anticipated throughout the year.

Thank you for carefully taking these comments into consideration as you prepare the final EIS.

TAMARACK SADDLE, LLC



Larry Scrivanich, Owner



Matt Neubauer, General Manager



Josh Jorgensen, Vice President