

October 19, 2025

Mike Kaputa, Director
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SEPA Responsible Official
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411 Washington St. Suite 201
Wenatchee, WA, 98801

RE: Mission Ridge Master Planned Resort Expansion
Draft Environmental Impact Statement Concerns

Dear Mr. Kaputa,

Thank you for the opportunity to provide comments regarding the DEIS for the proposed development adjacent to Mission Ridge ski area. The DEIS is full of omissions of impacts, inadequate mitigation of potential impacts, and incorrect assertions. Additionally, the proposed development violates Chelan County Codes. Highlighted issues with the DEIS are listed below:

Section 2 - PROPOSED PROJECT DESCRIPTION, ALTERNATIVES, AND PHASING

2.5 Determining Environmental Impact Statement Alternatives: The DEIS's consideration of alternatives is impermissibly limited to a project and a no-action alternative. An EIS is required to consider a reasonable range of alternatives. No alternatives were provided. The proposed driveway access road is environmentally invasive as it traverses steep sideslopes through important habitat and requires massive earthwork with un-mitigatable visual impacts. An alternative is warranted. The Aegis Engineering Option 1 secondary access is less impactful than the proposed main access road and would make a reasonable alternative access to the development. **The DEIS should be revised to include additional alternatives that could feasibly attain or approximate the proposal's objectives on the same site, but at a lower environmental cost. Included in these additional alternatives should be a viable alternative to the proposed main access road.**

2.6.1 Alternatives Considered but Eliminated - Integrated Power Planning - Costs: The developer's proposal relies on power system improvement costs that are borne by the community and not the developer. **The DEIS should be revised to clarify that the cost of all public service extensions and capacity increases must be borne by the developer and that improvements must be installed or bonded prior to occupancy. This includes SEPA study costs, new substation cost, power line improvements, and all costs associated with capacity increase to accommodate the development.**

2.6.1 Alternatives Considered but Eliminated - Integrated Power Planning - Phased Review: The transmission line construction needed to facilitate this project is impermissibly excluded from review in the DEIS. WAC 197-11-060(5)(d) provides that phased review of a project is inappropriate where it would segment consideration of proposals required to be evaluated in a single EIS under WAC 197-11-060(3)(b). **The DEIS should be revised to consider transmission line construction.**

Section 4 - AFFECTED ENVIRONMENT, POTENTIAL SIGNIFICANT IMPACTS, AND MITIGATION MEASURES – IMPACTS WITH SIGNIFICANT AND UNAVOIDABLE IMPACTS

Chapter 4 of the draft EIS concludes that the project would have significant adverse impacts with 4 elements of the project's affected environment. The document introduces these 4 elements as follows:

- **Earth.** *Construction and operation will create increased loading in an existing high landslide risk area.*
- **Fire Risk:** *Operation will lead to increased activity in an existing high fire risk area.*
- **Visual:** *Night ski operations will introduce new light and glare sources that cannot be mitigated.*
- **Land Use:** *While consistent with local planning, land use determination will change as a result of operation of the Proposed Project.*

Note the highlighted Land Use description in the introduction of section 4 claims that the project is consistent with local planning. This is not true. The project density is not possible without a Master Planned Resort Overlay, and the project does not satisfy the requirements of an MPR. (This is discussed thoroughly in [section 4.4.3, Findings for the Proposed Project, 4.4.3.2, Impacts from Operation, in the MPR section](#)). The project violates every recent community vision document, the Urban Growth Act, and Chelan County Code. It is not consistent with local planning. **The DEIS should be revised to delete this misleading and untrue persuasive language.**

Section 4.2 - Fire Risk

4.2.1.1 Fire Risk - Wildfire Risk in the Proposed Project Area: The DEIS understates fire behavior suggesting that the worst case wildfire scenario would be contained in several days or weeks. In addition, the risk described in the DEIS is based on historical forest conditions which have changed drastically in the last year due to widespread beetle kill in the upper basin. **The DEIS should be updated to acknowledge the possibility of very large uncontrollable wildfires and to assess risk associated with the current, not historical, condition of the surrounding forest.**

4.2.1.2 Fire Risk - Shelter-in-Place Strategy and Safe Refuge Areas - Safety Zones: The DEIS declares, without analysis, that the Mission Ridge parking lot may be a safe space where evacuation is not required. This assertion is irresponsible. The Mission Ridge parking lot is significantly undersized as a safe zone for even one vehicle and three people. Suggesting that areas may satisfy safety zone requirements is misleading and unhelpful in decision making. To understand the risk to a resident stranded at the development during a wildfire, the actual safety zone risk must be determined. **The DEIS should be revised to provide specific analysis of the Mission Ridge Parking Lot and any other area intended to be utilized as a safe zone, to determine conclusively whether those areas are, or are not, adequate safe zones where evacuation will not be needed.**

4.2.1.2 Fire Risk - Shelter-in-Place Strategy and Safe Refuge Areas - Shelter-in-Place Risk: The DEIS states that "...the risk of the expanded population having to shelter-in-place is low because the highest fire risk is towards the south and west of the Proposed Project and does not coincide with the direction of egress towards the north along Squilchuck Road..." This is faulty logic and dishonest. **The DEIS should be revised to remove persuasive language intended to downplay the danger associated with wildfires and blockage of the escape route.**

4.2.1.4 Fire Risk - Fuels Management in the Proposed Project Area: This chapter of the DEIS describes completed and future fuels reductions in the vicinity of the project and claims that the work will reduce wildfire risk by reducing fire intensity, rate of spread, and flame length. Fuels reduction reduces damage by fire in some cases, but not all. The language in the DEIS appears designed to suggest that fire risk could be ignored because the developer is reducing fuels. The DEIS then discusses future promised fuels reductions with a schedule "no later than Phase 2". Assertions of future treatments do not reflect current risk conditions. If the DEIS is to consider the fire risk including future treatments, then those treatments should be an enforceable condition of approval for permitting. **The DEIS should be**

revised to remove persuasive language aimed at suggesting treated forests are free from fire risk, and to either remove promises of future fuels treatments, or include these treatments as enforceable conditions of approval to be paid for by the developer and included in the mitigation section of chapter 4.2.

4.2.1.5 Fire Risk - Emergency Access in Proposed Project Area - Fire Station: The DEIS acknowledges that a new fire station is required, but does not indicate that any of the BLS or fire protection costs will be borne by the development and only offers a location for Chelan County to build a fire station (to be paid for by the County). **The DEIS should be revised to clarify that consultation with Chelan County Fire District is required and all costs for new service extension and capacity increase, including a new fire station and all apparatus required for that station, shall be borne by the development, and that these improvements must be in place and in operation before a single occupancy permit is issued.**

4.2.1.5 Fire Risk - Emergency Access in Proposed Project Area - Single Access Road: The DEIS acknowledges that the proposed single access road could be blocked, but downplays the danger of a blocked exit during a wildfire as an inconvenience. The DEIS further states that on-site emergency services reduce *the risk associated with a single pathway*. It is misleading to suggest that on-site emergency services can reduce the risk of death from an approaching wildfire that can't be escaped because the single access road is blocked. **The DEIS should be revised to acknowledge that blockage of the single access road could result in fatalities.**

4.2.1.6 Fire Risk - Anticipated Traffic Conditions and Relationship to Wildfire Risk: The DEIS states that *"Having more than one evacuation route provides redundancy and increased safety, particularly during unexpected or fast-moving events. Having a single wider and well-maintained access route can serve this same function under CCC."* A single wider well-maintained access road does not provide redundancy or increased safety, and particularly not during unexpected or fast-moving events. Not only is this statement untrue, but as discussed in [Section 5.6.3.3 Direct Impacts from Operation - New Public Access Road](#), a 28 foot wide road does not meet minimum Chelan County design standards. Calling the single access road "wider", when in fact the proposed road width is inadequate, is both persuasive and dishonest. **The DEIS should be revised to remove the persuasive and untrue statement that a single access road can provide redundancy and increased safety, and every reference to the access road as "wider" should be deleted.**

4.2.2.1 Fire Risk - Fire Behavior Around Proposed Project: The DEIS states that a fire occurring to the north of the project (downhill and towards Wenatchee) will pose *"...a moderate risk to the development and a low risk to evacuation."* Similarly, the DEIS states that a wildfire approaching from the south (uphill from the development) would pose high risk to the development but *"... low risk to evacuation as egress is in the opposite direction, to the north/towards Squilchuck Road"*. This analysis ignores the severity of wildfire that would likely occur on the upper portion of Mission Ridge. **The DEIS should be revised to substantiate the unlikely claims that a wildfire originating to the north of the development poses *"...a moderate risk to the development and a low risk to evacuation."* and that there would be *"low risk to evacuation"* caused by a fire approaching from the south.**

4.2.2.2 Fire Risk - Secondary Access - Alternative: The DEIS states: *"In response to public comments, Chelan County identified secondary access as a potential project alternative for this DEIS within the scope of "other reasonable alternatives for achieving the proposal's objectives on the same site."* Secondary access is not an alternative. It is a code requirement. If secondary access is possible, then it is required. The International Fire Code allows that the requirement for secondary access can be waived ONLY IF the modification will not lessen life and fire safety requirements. DEIS section 4.2.1.6

states that *“Having more than one evacuation route provides redundancy and increased safety, particularly during unexpected or fast-moving events.”* This statement alone clarifies that not providing secondary access LESSENS life and fire safety. Secondary access should be required by Chelan County during the permitting process. **The DEIS should be revised to include secondary access as an integral component of the project.**

4.2.2.2 Fire Risk - Secondary Access - Practicality: The DEIS cites the [Aegis Engineering Secondary Access - Review of Options report](#), which accepts the conclusions of the 2022 EcoSign secondary access routes study. This study provides no engineering criteria for comparison or decision making, and simply declares all secondary access routes unreasonable and impractical. The practicality standard for secondary access relied on in the Aegis report is only relevant for projects with less than 400 ADT trip generation. **The DEIS should be revised to acknowledge that secondary access practicality only applies to projects with less than 400 ADT, and to provide consistency in rejection criteria between roads the developer wants to build, and those that he does not.**

4.2.2.2 Fire Risk - Secondary Access - Update Engineering Report: The [Aegis Engineering Secondary Access - Review of Options report](#) argues that not being able to completely achieve compliance with road standards is a reason to dismiss Option 1 altogether, while simultaneously arguing that the County must accept the firewise recommendations in their Fire Protection Report as an acceptable substitute to compliance with the secondary access requirement. They argue to dismiss a good secondary access route because it has a non-code compliant corner, when creative engineering and design deviations could easily overcome this issue. And they also argue to completely throw out an important safety code requirement for secondary access, because they have some creative mitigating ideas in another report. These arguments are not consistent or serious. **Therefore, the report should be updated to remove bias, and the DEIS should be updated to reflect the conclusions of the revised report.**

4.2.2.2 Fire Risk - Secondary Access - Cost Considerations: The arguments against interconnectivity are ‘too much cut’ and ‘road on property owned by others’. These are not impractical obstacles. These are project challenges that the applicant is happy to address on the main access road. The secondary access road costs money. This is not a hardship factor that needs to be considered by Chelan County. The applicant wants to create a city in a remote area and there are code requirements in place to protect residents and emergency responders in such an undertaking. Secondary access is one of those requirements. The applicant has not proved unusual circumstances that would relax the requirement. In fact, the applicant has provided preliminary design for a secondary access that follows existing road alignments to the east and provides good physical separation and redundancy from a fire escape perspective. **Since secondary access is a project requirement, and may (and should) be required by the County during the permitting process, the DEIS should be revised to include secondary access as an integral component of the project and not as an alternative. The Aegis Engineering Option 1 is the only reasonable secondary access presented, therefore Option 1 should be the route included in the DEIS.**

4.2.2.2 Fire Risk - Secondary Access - Life/Safety Improvements must be operational prior to occupancy: The land use standards sought by the developer are defined by the Master Planned Resorts Overlay District (MPR) chapter of Chelan County Code. [Section 11.89.040\(8\)](#) of the MPR code requires that all safety improvements must be installed and in operation prior to occupancy. **The DEIS should be revised to acknowledge that the second access road must be operational prior to issuance of any occupancy permits.**

Secondary Access summary: **The engineering report should be updated to remove bias and provide consistency in rejection criteria between roads the developer wants to build, and those**

that he does not. The DEIS should be updated to reflect the conclusions of the revised report. The DEIS should be revised to include preliminary design for the proposed main access road, and include study of the environmental impacts of the Aegis Engineering Option 1 route as an integral project component and not as an alternative. The revised DEIS should acknowledge that the second access road must be operational prior to issuance of any occupancy permits.

4.2.3.2 Fire Risks - Impacts from Operation: Section 4.2.3.2 is 7 pages long and contains only 4 partial sentences describing impacts from operation. These are:

During operation, the increased number of people will increase fire hazard risk...

- *...the Proposed Project will create higher summer use in the area, particularly in the Proposed Project Area, and therefore influence the potential for increased human-ignited wildfire.*
- *...the introduction of additional utilities to the area in the form of electrical service and propane sources poses a risk.*
- *The increase in traffic to the Proposed Project Area will have an impact on emergency access through Squilchuck Road and the new proposed road to the development.*

Not a single impact is listed in the Summary of impacts. **The entire subchapter Section 4.2.3.2 should be rewritten to discuss and describe impacts. All persuasive language downplaying impacts or describing treatments or policies should be removed from this section.**

4.2.3.2 Fire Risk - Impacts from Operation - Vegetation Treatment: The DEIS states that the probability of human-caused ignitions is low. This is misleading and not true. It is widely accepted that roughly 85% of wildfires are human caused. To suggest that the risk of human caused fire in a dry forest with between 300 and 4000 people newly introduced to the landscape is insincere. **The DEIS should be revised to remove this misleading statement.**

4.2.3.2 Fire Risk - Impacts from Operation - Defensible Space - Fuel Break Maintenance: The DEIS states: *"Defensible space and fuel break maintenance practices and frequency were not specified in the Fire Protection Plan..."* **The DEIS should be revised to acknowledge that Tamarack Saddle is a separate entity from New Mission LLC (the ski area ownership company) and to include defensible space and fuel break maintenance practices and frequency in the Fire Protection Plan.**

4.2.3.2 Fire Risk - Impacts from Operation - Defensible Space - MPR Fire Protection Plan Requirement: The DEIS contains several bullet points that it says must be incorporated into this MPR Fire Protection Plan including: *"Develop and maintain additional Safe Areas in strategic locations. This shall include constructing the base Lodge as a safe area and providing sufficient parking to afford one space for each dwelling unit."* However, the project site plans do not show a new base lodge at the development, and the plans do not show an associated parking lot with either 886 or 1023 spaces (depending on whether hotel rooms and employee beds count as dwelling units). If this requirement is to be enforced, then **the DEIS should be revised to show the new base lodge and the safe area parking on the project maps. These project elements should be listed as a condition of approval on permits, and should be included in the Mitigation section of chapter 4.2 of the DEIS.**

4.2.3.2 Fire Risk - Impacts from Operation - Fire Protection: The DEIS states: *"Mission Ridge has a Crisis Action Plan and a Wildfire plan in place."* **The DEIS should be revised to clarify that the development needs its own Crisis Action Plan and Wildfire Protection Plan and cannot rely on cooperation with a separate entity.**

4.2.3.2 Fire Risk - Impacts from Operation - Fire Protection: The [Aegis Fire Protection Plan](#) argues not to conform to applicable requirements of the IFC, and instead asks that the Fire Marshall allow exceptions to reduce ingress/egress and fire flow requirements. [IFC section 104.9](#) allows reduction in fireflow when “... such modification does not lessen health, life and fire safety requirements.” **The DEIS should be revised to acknowledge that the application materials suggest lower fire flow requirements and that relaxing the code would lessen life and fire safety and would therefore be a code violation.**

4.2.3.2 Fire Risk - Impacts from Operation - Emergency Access: In lieu of a secondary access road, “...the applicant proposed to maintain an access road of at least 28 feet width to meet Chelan County Code 15.30.230(4)”. A single access road is unacceptable. Secondary access requirements are discussed in [section 4.2.2.2 Secondary Access](#). Secondary access is required. **The DEIS should be revised to include study of the impacts of secondary access.**

4.2.3.2 Fire Risk - Impacts from Operation - Emergency Access - Fire Station: The DEIS states: “Additionally, an annexed fire station would be staffed by a volunteer fire fighting team to complement coverage provided by CCFD1 to provide local immediate emergency response to any fire emergencies. Chelan County Fire District #1 has argued that the proposed location for a future fire station sharing space with the Ski Maintenance Facility cannot be accepted. The applicant has indicated that the fire station is to be built using County (not development) dollars and would be installed “...at the discretion of the fire district...” and staffed by volunteer firefighters. Chelan County Fire District #1 has argued that the District may not be able to recruit and maintain volunteers. **The DEIS should be revised to include consultation with CCFD#1 with workable solutions that include the agreement of the Fire District and costs borne by the developer.**

4.2.3.2 Fire Risk - Impacts from Operation - Emergency Access - CCFD1 Requirements: The DEIS discussed only two mitigation measures “related to emergency access proposed by the applicant in consultation with CCFD1.” The issues discussed in the DEIS are incomplete to the list of Issues discussed in Fire Chief Brian Brett’s March 30 [comment letter](#). **The DEIS should be revised to analyze the issues discussed in the [March 30 CCFD#1 comment letter](#).**

4.2.3.2 Fire Risk - Impacts from Operation - Summary of Impacts from Operations: The entirety of the summary of 7 pages of Impacts from Operations follows: “In summary, there are probable significant adverse operations-related impacts from increased human activity during high fire-risk summer season and additional traffic on access roads from the Proposed Project. These impacts can be partially mitigated for as described in Section 4.2.3.3.” This is an inadequate summary of impacts as not a single impact is listed. **The DEIS should be revised to provide an actual summary of impacts from operation.**

4.2.3.3 Fire Risk - Proposed Mitigation Measures - Additional Applicant Proposed Mitigation Measures - Egress during Wildfire Season - Single Access: The DEIS indicates: “When evacuation is required:

- Primary egress will remain along Mission Ridge Road.”

Secondary access is a code requirement, not a mitigation requirement. Omission of secondary access in the discussion of evacuation mitigation is irresponsible. If secondary access were provided, then when the Mission Ridge Road was compromised, the residents of the development would have a safe exit and firefighters would have access to respond to the emergency. **The DEIS should be revised to include secondary access as an integral plan element and not an alternative.**

4.2.3.3 Fire Risk - Proposed Mitigation Measures - Additional Applicant Proposed Mitigation Measures - Egress during Wildfire Season - Tamarack duty: The DEIS states:

- *If Mission Ridge Road is compromised (e.g. by fire, by car accident), Mission Ridge will work with local fire authorities to determine best options for protecting public health until Mission Ridge Road is again passable, and to accelerate the reopening of the road. Options may include:*

This plan requires a separate entity, Mission Ridge, to be responsible for Tamarack Saddle safety. Mission Ridge is an independent entity that runs a ski area and has no ownership or obligation to the private development. The development is owned and operated by Tamarack Saddle, LLC. The owner of the property may not farm out its obligations to a neighboring business. **The DEIS should be revised to acknowledge that Tamarack Saddle is a separate entity from New Mission LLC (the ski area ownership company) and to include coordination with EMS in its own Crisis Action Plan.**

4.2.3.3 Fire Risk - Proposed Mitigation Measures - Additional Applicant Proposed Mitigation Measures - Egress during Wildfire Season - Shelter-in-Place: The DEIS suggests:

- *Shelter-in-place at Mission Ridge safe refuge areas.*

As discussed in Section [4.2.1.2 Shelter-in-Place Strategy and Safe Refuge Areas - Safety Zones](#), The DEIS has not determined that the suggested shelter-in-place areas are actually compliant with applicable regulations or even safe. To suggest as mitigation that residents can stay in their homes when it is not clear that the homes are safe to stay in, is irresponsible and is not appropriate mitigation for fire danger. **The DEIS should be revised to include studies to determine actual safe zone requirements and then discuss those areas with certainty.**

4.2.3.3 Fire Risk - Proposed Mitigation Measures - Additional Applicant Proposed Mitigation Measures - Egress during Wildfire Season - Evacuation: The DEIS suggests:

- *Evacuation of some portion of the residents/visitors via existing unimproved roads/trails to Squilchuck State Park or other locations if safe to do so.*

The DEIS indicates that there are existing unimproved roads that exit the development to other locations. If, in their unimproved condition, these roads are adequate for evacuation by development residents, then with some improvements, these roads are reasonable secondary access routes. **The DEIS should be revised to include the existing unimproved road option 1 as secondary access.**

Further, the applicant appears to be suggesting that residents should **hike through the woods** to safety. In the situation where a wildfire is approaching the development and the only access road is blocked to vehicle traffic, encouraging residents to set out on foot to find safety appears reckless. **The inclusion of escape on foot as a plan element should be removed from the DEIS.**

4.2.3.3 Fire Risk - Proposed Mitigation Measures - Additional Applicant Proposed Mitigation Measures - Egress during Wildfire Season - Summary: None of the evacuation discussion in Section 4.2.3.3 is mitigation. It is a persuasive description of options that the developer is willing to present as evacuation or shelter-in-place locations. Omission of secondary access, shelter in place in locations not analyzed to be safe, suggesting evacuation by car along existing roads that the developer has declared impractical for secondary egress, suggesting evacuation by foot along trails through the forest, are all irresponsible safety suggestions, inconsistent with arguments made elsewhere in the DEIS, and do not belong in the mitigation section of the Fire Risk chapter of the DEIS. **The DEIS should be revised to include secondary egress, remove suggestions of unsafe egress strategies, and to provide analysis of the Mission Ridge Parking lot, the proposed remote day-use lot, and the homes and buildings that are presented without evidence as safe zones.**

4.3.3.1 Visual - Impacts from Construction - Light and Glare: The Light and Glare section contains no quantitative measurements and instead relies on unverified assumptions. In addition, the DEIS claims

that construction impacts are temporary in nature and therefore do not create significant adverse impacts. **To disregard an impact because it is temporary is insincere when the temporary nature of the impact is expected to last twenty years. The DEIS should be revised to inventory current and proposed lighting and to delete the misleading premise and conclusion that the impact is temporary and therefore not significant.**

4.3.3.2 Visual - Impacts from Operation - Building Height: The DEIS states that *“The tallest building height will be approximately 45 feet...”*. Building height limits in the base zones are limited to 35 feet. CCC 11.89.50(5). The developer proposes to exceed that limit, but proposes no explanation for why they cannot comply with it. **Without establishing that they cannot comply with the building height limitation, the DEIS should clarify that the hearing examiner should not approve such a variance.**

Section 4.3 - Visual

4.3.3.1 Visual - Impacts from Construction - Light and Glare: The Light and Glare section contains no quantitative measurements and instead relies on unverified assumptions. In addition, the DEIS claims that construction impacts are temporary in nature and therefore do not create significant adverse impacts. **To disregard an impact because it is temporary is insincere when the temporary nature of the impact is expected to last twenty years. The DEIS should be revised to inventory current and proposed lighting and to delete the misleading premise and conclusion that the impact is temporary and therefore not significant.**

4.3.3.2 Visual - Impacts from Operation - Building Height: The DEIS states that *“The tallest building height will be approximately 45 feet...”*. Building height limits in the base zones are limited to 35 feet. CCC 11.89.50(5). The developer proposes to exceed that limit, but proposes no explanation for why they cannot comply with it. **Without establishing that they cannot comply with the building height limitation, the DEIS should clarify that the hearing examiner should not approve such a variance.**

4.3.3.2 Visual - Impacts from Operation - Light and Glare - Sky View: The DEIS acknowledges the negative impact of added lighting on astronomy and night sky aesthetic, but it omits impacts on:

- local forests where camping and outdoor education occur
- the Manastash Ridge Observatory, which will experience noticeable skyglow increases.
- migratory mule deer may alter their routes
- cougars could change nocturnal hunting tactics
- salmonid navigation and predation rates can shift in response to artificial light.
- migratory birds using the Pacific Flyway also suffer increased collision risk under bright skies.

Light emitted from this expansion will spread beyond Mission Ridge, contributing to skyglow observed as far away as the Methow Valley which is already impacted by Mission Ridge skyglow. **The DEIS should be revised to include a comprehensive analysis of light pollution impacts including safety risks, recreational impacts, and impacts on wildlife.**

4.3.3.2 Visual - Impacts from Operation - Light and Glare - Driver Safety: The DEIS claims that additional nighttime light would improve safety for drivers and visitors. This is not true. Additional nighttime glow will not improve safety for drivers or visitors. High levels of skyglow create a distracting halo that may reduce roadway safety. White light scattering by aerosols increases fog reflectivity, further degrading visibility under low-visibility conditions. **The DEIS should be revised to remove the untrue statement that additional nighttime light will improve driver safety.**

4.3.3.3 Visual - Proposed Mitigation Measures: The DEIS cites Chelan County Code 11.88.08 as the sole mitigation strategy for addressing light pollution. This reflects a minimalist approach to mitigation, offering regulatory compliance, not ecological stewardship. Additional mitigation strategies must be required. Prior to expansion approval, additional measures should be incorporated into a Light Management Inventory and Plan that reflects the best modern practices in dark sky protection. **The DEIS should be revised to include mitigation measures beyond the bare minimum required by code.**

Section 4.4 - Land and Shoreline Use

4.4.1 Land and Shoreline Use Overview - WDFW and DNR Land Exchange: Section 25 is owned by WDFW and was purchased in 1953 with funds from the *Federal Aid to Wildlife Restoration Act of 1937*. Section 25 includes the upper half of Chair 4, Windy Ridge, Bowl 4, and overlaps with the proposed project. Hunters still use the section during archery and rifle seasons as well as for forest grouse hunting. Section 25 contains many WDFW Priority Habitats and Species, and its cool, north-facing slopes are unique, providing crucial wildlife habitat on Mission Ridge. The DEIS states that WDFW has indicated that: *"...an expanded, year-round ski resort is not an allowable use of the land under the U.S. Fish and Wildlife Service (USFWS) contract that funded WDFW's purchase of the property."* The DEIS discusses a land exchange between WDFW and Washington State DNR that would result in DNR owning Section 25 and implying that expanded year-round resort would be allowable on DNR owned Section 25. However, the DEIS further states that: *"The land swap is not part of the current Proposed Project."* With the land exchange not on the table, and DFW indicating that expanded ski resort activity is not an allowable use of Section 25, **the DEIS should be revised to modify the proposal to exclude section 25 from any expanded ski resort or development activity.**

Section 4.4.3 Findings for the Proposed Project

4.4.3.2 Land and Shoreline Use - Impacts from Operation - Critical Areas: CCC Chapter 11.77 requires that projects containing critical areas conduct a critical areas report and avoid, then mitigate, all impacts to critical areas. And Chapter 11.78 requires that projects containing fish and wildlife habitat conservation areas prepare a habitat management and mitigation plan. The DEIS confirms that the project site includes multiple categories of critical areas as well as fish and wildlife habitat conservation areas. However, the DEIS proposes to establish compliance with these provisions at a later date, sometime before beginning construction. This is not acceptable. Both CCC Chapter 11.77 and 11.78 contemplate these requirements being met at the time of an initial land use application. **The DEIS should be revised to acknowledge that before the County can approve any element of this project, including establishing the MPR overlay, the applicant must demonstrate compliance with these provisions.**

4.4.3.2 Land and Shoreline Use - Impacts from Operation - Recreation: The DEIS claims *"The proposed project would likely make it easier for recreationists to access surrounding public lands."* This is not true for users of the Lake Clara trail, who will have to park further from the trailhead when the new driveway road eliminates the Lake Clara trailhead parking area. And it is not true for winter recreationalists whose route between the Mission Ridge parking lot and the upper Stemilt basin will be blocked by a new chairlift and SUP area expansion. **The DEIS should be revised to examine the negative effects of the plan in addition to noting potential positives.**

4.4.3.2 Land and Shoreline Use - Impacts from Operation - Land Use and Potential for Future Growth: The DEIS claims that *"The increased capacity provided by improved roadways and utilities could accommodate growth beyond the proposed project area."* Chelan County Code [section 11.89.040 General Requirements](#) requires that any capacity increases generated by the development do not promote sprawl or urban level of development adjacent to the MPR. **The DEIS should be revised to**

investigate the potential sprawl enabled by the project and discuss this conflict with County Code.

4.4.3.2 Land and Shoreline Use - Impacts from Operation - Land Use and Restrictions on Future Land Use in Study Area: Mission Ridge has a history of limiting or denying travel, hunting, camping, dogs, snowmobile and other motorized access, drone use, and parking on public lands within their special use permit area. This behavior can be expected to continue. Extending the boundaries of the ski area's special use permit will effectively eliminate access to public lands in the expanded Special Use Permit area. **The DEIS should be revised to examine the negative effects of the plan on future use within the expanded Special Use Permit area.**

4.4.3.2 Land and Shoreline Use - Impacts from Operation - Project Area Character: The DEIS lists potential changes in the rural character of the upper Squilchuck and Stemilt basins and then dismisses these concerns. **The DEIS should be revised to seriously assess and discuss the changes in character to the rural nature of the upper Squilchuck and Stemilt basins.**

4.4.3.3 Land and Shoreline Use - Proposed Mitigation Measures - MPR: The DEIS includes as land use mitigation measures the following: *"Compliance with all Chelan County code requirements for MPR development."* However, the project does not comply with Chelan County Code requirements for MPR development. **The DEIS should be revised to eliminate citation of compliance with MPR requirements as a mitigation measure.**

Section 4.4.4 Significant and Unavoidable Adverse Impacts

The DEIS lists no significant and unavoidable adverse impacts and asserts land use impacts would be insignificant. The DEIS asserts:

"...the proposed project and utility improvements would be consistent with applicable plans and regulations, would not conflict with surrounding land uses..." and "Compliance with all regulatory and permit requirements, and implementation of the mitigation measures described previously, would reduce land use impacts."

The proposed project is not consistent with Chelan County guiding documents, causes significant conflicts with surrounding land uses and creates many significant and unavoidable adverse impacts. The DEIS arguing that the land use impacts are reduced is not a sincere discussion of "Significant and Unavoidable Adverse Impacts". **The DEIS should be revised to include a list of significant and unavoidable adverse impacts as described in chapter 4.4 and as expanded through public comments.**

Section 5 - AFFECTED ENVIRONMENT, POTENTIAL SIGNIFICANT IMPACTS, AND MITIGATION MEASURES – IMPACTS PROBABLY MITIGATED BELOW SIGNIFICANCE

Chapter 5 of the draft EIS concludes that the project will not have significant adverse effects with 11 environmental elements. We argue that the following 6 elements do suffer unavoidable significant adverse impacts if mitigated only to the level suggested in the EIS. These are:

- 5.1 Air
- 5.2 Groundwater
- 5.3 Surface water
- 5.4 Plants and Animals
- 5.6 Transportation
- 5.8 Noise
- 5.10 Recreation

5.1 Air: The DEIS claims there are no impacts on air quality. The DEIS does not explore the health impacts of increased air pollution along the roadway caused by the traffic associated with the proposed development. Residents who live along the Squilchuck and Mission Ridge roads currently enjoy mostly clean air with occasional unpleasant smells related to traffic. Specifically, some vehicles traveling downhill from Mission Ridge to Wenatchee ride their brakes enough to create an unpleasant hot brake smell that lingers for several minutes after they pass. In the proposed condition, if only 1 in 25 cars rides their brakes, the smell will be constant with no clean fresh air breaks. This is an unavoidable impact, and to the residents who live along Squilchuck and Mission Ridge road, this will be a significant impact. **The DEIS should be revised to study the indirect impacts from Construction and Operation on air quality related to increased vehicle traffic, and if the revised DEIS finds that the impacts are unavoidable and significant, then Section 5.1 - Air should be relocated from chapter 5 of the DEIS to chapter 4.**

5.2 Groundwater - Water Quantity: The DEIS describes using on-site groundwater wells as the exclusive source of potable water until eventually being forced to transition to PUD water. By this strategy, all of phase 1 and about half of phase 2 could be built without a connection to the PUD water system. If this is allowed, and the developer stops construction without connecting to the PUD water system, then the impact to the Squilchuck basin is a net additional withdrawal of 240 acre-feet per year. The DEIS argues that at full-buildout, imported PUD water will eliminate any net negative water quantity impact, and therefore, there are no significant adverse construction or operation related impacts on groundwater quantity from the proposed project. This is not true for the situation where full-buildout is not achieved. Considering only the full-buildout condition for assessment of adverse impacts is inadequate. The partial complete condition of the project could last between 20 years and forever. **The DEIS should be revised to study the impacts during the early phases of the project if water is withdrawn from the aquifer and before imported PUD water balances the net negative water quantity effects. The conclusion that there are no probable significant adverse construction or operation impacts should be revised to acknowledge the adverse impacts during early phases caused by removing water from an already overallocated water budget.**

5.2 Groundwater - Water Quality: The wastewater strategy described in the DEIS is to use individual or group on-site septic systems that discharge through drainfields to groundwater for the early phases of the project, and eventually, if needed, install a centralized municipal wastewater treatment plant (WWTP) that would discharge to surface waters. However, the DEIS describes that it is unknown how much space will be required for drainfields, or whether the soils are even suitable for drainfields. *"The Applicant is prepared to pivot to surface treatment and discharge through an NPDES permit if soils are not suitable."* The DEIS discusses that in 1986 an FEIS study determined that a WWTP could not be built because the flow in Squilchuck Creek was too small to meet the minimum dilution criteria, but that advances in technology suggest that *"previous SEPA findings related to wastewater treatment at this site are due for reconsideration..."* Despite no assurance that either suggested wastewater treatment strategy is workable, the DEIS concludes that ***"there would not be probable significant adverse operation-related impacts on groundwater quality from the Proposed Project."*** This conclusion does not follow the arguments. There has been insufficient study to know whether soils are even suitable for on-site septic systems, and the backup WWTP strategy, which was ruled out in 1986, is "due for reconsideration". This level of study is inadequate to make any informed decision about the appropriateness of either system. Soil studies should be completed to allow preliminary design and layout of septic drainfields to verify whether adequate soils or space even exists. Preliminary design of the WWTP needs to be completed to the level at which it can be determined whether a WWTP is a workable wastewater treatment solution at the site. The site plans should show the location of the two solutions including general drainfield locations, WWTP location, and discharge to Squilchuck Creek location. In addition, domestic water use introduces pharmaceuticals, PFAS, and viruses to effluent which will contaminate the currently pristine Squilchuck Creek. **The DEIS should be revised to clarify**

that a WWTP will be required, to include studies for drainfield soils appropriateness, size and layout, and to include a [WAC 173-150-060](#) compliant engineering report for WWTP appropriateness, location, and cost. The DEIS should be revised to acknowledge the pharmaceuticals, PFAS, and virus contamination to Squilchuck Creek from domestic effluent and to assess the impact on the watershed for irrigation and drinking water. The DEIS should be revised to clarify that the WWTP must be bonded at 150% of the estimated cost.

5.2 Groundwater - Water supplies/rights: The DEIS describes 240 acre-feet of new withdrawal of groundwater in-perpetuity at the development but argues that: *“Full use of the Applicant’s existing right is already authorized and cannot impair other existing rights.”* This is an insincere legal argument that ignores the actual physical impact to senior water rights holders downstream of the development. The downstream users have priority by date and are currently not receiving full distribution of their adjudicated water. Removing additional water beyond what has historically been removed will further impair their rights and is not acceptable. The DEIS states *“The Applicant has stated there would be no enlargement of existing water rights, meaning that the quantity of water that is already authorized and being put to use would remain the same. This is a requirement of state law.”* However, the DEIS fails to recognize that new domestic withdrawal and expanded snowmaking will require using authorized rights that have not been put to use and are therefore no longer valid. This water has never been removed from the system, and to start now would be a new withdrawal that would affect stream flow and reduce the already curtailed rights of downstream irrigators. **The DEIS should be revised to recognize that new withdrawals on previously authorized quantities which have not been put to use, will have a significant negative impact on senior water rights holders downstream of the development.**

5.2.4 Groundwater - Significant and Unavoidable Adverse Impacts: The DEIS states: *“...there would be no significant and unavoidable adverse impacts related to groundwater from construction or operation of the Proposed Project.”* However, new withdrawals from the headwaters of the Squilchuck drainage will negatively affect streamflow quantity and the ability of senior water rights holders to fulfill their rights. **The DEIS should be revised to recognize that new withdrawals on previously authorized quantities which have not been put to use, will have a significant negative impact on creek flow and on senior water rights holders downstream of the development.**

5.4 - Plants and Animals - Habitat Maps: The habitat maps referenced by the DEIS (Figures 5.4.2,3,5,6,7) contain inaccuracies that result in incorrect conclusions throughout the Plants and Animals chapter. These maps should be updated with the best available science. Accurate elk and mule deer wintering, fawning and calving on the project area, elk summer use of the project area, extent of invasive weeds, eastside old growth forests, and PHS snags and logs should all be updated on these maps. **The DEIS should be revised to include the updated and revised habitat maps and all decisions based on these maps should be revisited and revised as informed by the updated information.**

5.4.1 - Plants and Animals Overview - Pika and Wolverine: The DEIS presents plants and animals with special status in *Table 5.4-1: Terrestrial Special Status Species and Habitats that Potentially Occur Near the Study Area*. However, this table omits American Pika and wolverine (*gulo gulo*), which both have special status and occur near the study area. **The DEIS should be revised to include American pika and wolverine in Table 5.4-1: Terrestrial Special Status Species and Habitats that Potentially Occur Near the Study Area.**

5.4.1 - Plants and Animals Overview - Aquatic Plants and Animals: The DEIS omits a wetland near the loading area of the proposed chairlifts in Section 19 and a perennial non-fish bearing stream that

originates on Section 30 near the proposed reservoir. These water bodies are also missing from *Figure 5.3-3 "Surface Waters and Proposed Development"*. **The DEIS should be revised to map and assess these missing water bodies.**

5.4.1 - Plants and Animals Overview - Fish Species: The DEIS suggests that there could be three state priority species of fish using Squilchuck Creek including rainbow trout, west slope cutthroat trout, and mountain sucker, but admits that their presence is unconfirmed. Knowing whether these species are present at the project site is critical to the discussion of impacts and mitigation. An electro-shocking or E-DNA survey should be completed to identify or rule out the presence of these species. **The DEIS should be revised to remove speculation about the presence of State Priority Species of native fish by completing a study and reporting the results along with impacts and mitigation.**

5.4.3.1 Plants and Animals - Impacts from Construction - Commonly Occurring Terrestrial Animals - Suitable Habitat: The DEIS suggests without evidence that adjacent lands can replace the function of the areas disturbed by the proposed development. *"These adjacent lands contain potentially suitable habitat and migration corridors (e.g., riparian corridors) that are similar to habitats in the study area."* AND *"...relatively abundant supporting habitat will remain in adjacent areas."* This is not true. This suggests that the damage to plants and animals created by the proposed development simply takes a bite out of a much larger and homogeneous landscape. The habitat interrupted by the project is unique and irreplaceable. It is a heavily used migration corridor consisting of critical wildlife habitat including travel corridors, feeding area, bedding areas, fawn and calving zones, and ungulate breeding habitat. The area contains a diverse range of habitats including cool north-facing slopes, mature forests with complex horizontal structure and closed overhead canopy, old-growth forests interspersed with open grassy meadows, shrub steppe, springs, cliffs, talus, and aspen groves. The diversity of habitats allows for a diversity of wildlife species. For ungulates and larger mammals in particular, the abundance of talus fields (and cliffs) creates a barrier. Most large animals avoid traveling through the loose talus and seek firmer footing to avoid the cattle-guard-like danger of talus. **The DEIS should be revised to remove unjustified statements declaring adjacent lands can replace the function of the areas disturbed by the proposed development.**

5.4.3.1 Plants and Animals - Impacts from Construction - Commonly Occurring Terrestrial Animals - Talus: The DEIS acknowledges that talus is habitat for ectotherms: *"Typical habitat for ectotherms (species that use their environment to regulate their body temperatures) includes exposed rocky areas and talus..."*. The talus within the project area is also used by American Pika. Most of the talus fields in Section 19 appear to be scheduled for grading and removal. This habitat destruction is not discussed and no mitigation is offered. **The DEIS should be revised to acknowledge that most of the talus field habitat in Section 19 will be destroyed and the impacts of this action should be assessed with mitigation offered.**

5.4.3.1 Plants and Animals - Impacts from Construction - Commonly Occurring Terrestrial Animals - Amphibians: The DEIS suggests that due to the limited areas of aquatic habitat, *"...the Proposed Project is likely to have fewer impacts on amphibians relative to other animal groups."* However, there are perennial streams, wetlands, and riparian areas throughout the project area. Two section 19 wetlands are scheduled to be filled. These wetlands are known amphibian breeding grounds. Western toads and spotted frogs have been seen nearby and may be using these features. The DEIS wetland assessments are not accurate as they miss both a key wetland in the center of the section 19 development, and a perennial stream. Both may be impacted by construction activities. **The DEIS should be revised to include a better wetland assessment to accurately account for these missing waterbodies in order that the impacts from destroying these waterbodies can be**

assessed. In addition, an amphibian survey needs to be completed during the breeding season in order to confirm or rule out the presence of western toads and spotted frogs.

5.4.3.1 Plants and Animals - Impacts from Construction - Commonly Occurring Terrestrial Animals -

Summary: The DEIS summarizes the impacts on terrestrial animals without acknowledging any significance. *“Overall, construction impacts on commonly occurring terrestrial animal species are expected to occur. However, as noted previously, many animals will leave the construction area to avoid the disturbance and occupy similar adjacent habitats, which are relatively abundant in the study area and surrounding lands.”* There is no evidence that similar, abundant habitats exist in adjacent lands. The DEIS wildlife maps show that high quality elk habitat is limited in the area. The [2025 FOMR Trail Camera Survey](#) shows that cool, timbered, north-facing slopes are rare on Mission Ridge. Most of these north-facing habitats are interrupted with roads and the proposed project area contains one of the last intact patches of undisturbed habitat in this upper elevation environment. Nearby Section 17 was recently converted from an open forest where wildlife could move freely, to a fenced off orchard. Taken cumulatively, this shrinking of habitat reduces the size of animal populations, reduces genetic diversity, and causes impediments to migration and adaptation in the face of climate change and other pressures. Reducing habitat decreases animal resiliency. **The DEIS should be revised to acknowledge that habitat destruction has a significant impact and the assessment should include cumulative impacts including habitat destruction on nearby lands.**

5.4.3.1 Plants and Animals - Impacts from Construction - Commonly Occurring Terrestrial Animals -

Special Status Terrestrial Plants and Animals: Table 5.4-2 *Potential Construction Impacts on Special Status Terrestrial Species and Habitats* contains inaccuracies or is missing information for Whitebark Pine, Cascade Red Fox, Elk, Pika, Western Toad, Dusky and Sooty Grouse, Northern Goshawk, American Martin, Columbia Spotted Treefrog, Golden Eagles, Roosting Bat Colonies, Aspen, Old-growth Forest, Talus, and Migratory Birds. **The DEIS should be revised to:**

- **Study and assess the impacts and extent of the beetle kill on the upper-elevation whitebark pine**
- **Remove the unjustified claim that whitebark pine population impacts are minor.**
- **Confirm or rule out the presence of cascade fox in the project area.**
- **Include additional studies and the best available science in regards to impacts on elk near the project site.**
- **Include Pika.**
- **Confirm or rule out the presence of western toad such that appropriate mitigation can be discussed.**
- **Include additional grouse habitat discussion.**
- **Address the presence of goshawk on the project area.**
- **Consider American martin activity on the project area and provide serious mitigation discussion.**
- **Include breeding season studies of the project area wetlands to determine whether Colombian spotted treefrogs are using these habitats and determine appropriate compensatory mitigation for wetland destruction.**
- **Consider impacts to golden eagles by disturbance from the development.**
- **Conduct acoustic monitoring studies to determine talus use by roosting bats and consider impacts of destruction of that unique and preferred talus bat roosting and hibernating habitat.**
- **Correct the reported size and priority habitat designation of the aspen stand and determine whether aspen removal is significant.**
- **Include an inventory of old-growth forest on the project area and an assessment of the impacts of loss of old-growth forest habitats on Section 19 and 25.**

- Include a discussion of impacts to talus residents which may include roosting bat colonies, pika, larch mountain salamanders. A study will be required to identify resident species.
- Consider the impacts on migratory birds from light pollution, noise pollution and glass strikes from nearly 1000 new residential units plus commercial space and other buildings. The DEIS should offer mitigation strategies to compensate for these impacts.

5.4.3.1 Plants and Animals - Impacts from Construction - Summary of Impacts from Construction: The DEIS states that there would be no probable significant adverse construction-related impacts. This is not true. **The DEIS should be revised to include and discuss the construction-related impacts listed above and collected through public comment. An incomplete list of these impacts includes: critical habitat loss, dispersion of elk to inferior migration and travel corridors with less valuable habitat, loss of whitebark pine endangering the entire Mission Ridge whitebark population, aspen grove priority habitat removal, destruction of old-growth forest, destruction of talus habitat, and introduction of glass strikes for migratory birds.**

5.4.3.3 Plants and Animals - Permit-required Mitigation Measures: Item 7 of this section states: *“Impact analyses relative to elk will apply the best available science as identified by WDFW, through the elk habitat model and recently completed literature review (Gaines et al. 2020).”* Habitat models are theoretical and require ground truthing. The current habitat model and literature review do not match the on-the-ground conditions found in the [2024-2025 Mission Ridge Trail Camera Survey](#) and therefore do not represent the best available science. Additional ground study is required. **The DEIS should be revised to update the elk habitat maps with the best available science.**

5.4.4 Plants and Animals - Significant and Unavoidable Adverse Impacts: The DEIS claims *“...there would be no significant and unavoidable adverse impacts on terrestrial and aquatic habitats and species from construction or operation of the Proposed Project.”* This assessment is incomplete and false. The actual impacts from construction and operation were not fully examined in chapter 5.4. The goal of mitigation is no net loss of ecological function. To achieve this, the sequence is first to avoid impacts, if impacts can't be avoided, they must be minimized, and if there is no way to minimize the impacts, then compensation is required. This harm reduction sequence is rarely engaged in the Plants and Animals chapter of the DEIS. The document either minimizes, or fails to acknowledge impacts. **The DEIS should be revised to include the additional studies discovered through the public comment process in order to correct erroneous information to provide an accurate assessment of the project's impacts. Once the impacts are understood, appropriate mitigation efforts can be proposed.**

Section 5.5 - Energy and Natural Resources

5.5.4.1 Energy and Natural Resources - Direct Impacts from Construction - Open Space: The DEIS claims that the project increases public access to open space. However, extending the boundaries of the ski area's special use permit will effectively eliminate access to public lands in the expanded Special Use Permit area. This will also cut off access to recreationalists who currently use that area as a travel path from the Mission Ridge parking lot to the newly established winter non-motorized area in the upper Stemilt Basin. Unilaterally declaring that the project increases public access to open space is irresponsible. **The DEIS should be revised to discuss negative effects on public access and this statement should either be corrected or deleted.**

5.5.4.1 Energy and Natural Resources - Direct Impacts from Construction - Water and Forest Resources: The DEIS states: *“Construction of the Proposed Project would have potential impacts to surface waters, including Squilchuck Creek and tributaries to Squilchuck and Stemilt creeks.”*, and then

concludes: *“Therefore, ... there would not be probable significant adverse construction-related impacts on forest and water resources from the Proposed Project.”* This is nonsensical. The DEIS should be revised to acknowledge the negative impacts to waters including the actual physical impact to senior water rights holders downstream of the development. [Section 5.2 Groundwater](#) and section [5.3 Surface Water](#) discuss the negative impacts caused during construction and operation on the already overallocated water budget should the developer be allowed to remove water from the headwaters of the Squilchuck Basin. **The DEIS should be revised to acknowledge the issues discussed in those sections and Section 5.5.4.1 should be updated to recognize these significant negative impacts.**

[5.5.4.3 Energy and Natural Resources - Direct Impacts from Operation - Energy Supply and Demand:](#)

The DEIS indicates that the proposed project intends to use power from the existing Squilchuck power lines until the capacity is completely used up. Once the existing capacity is used up, new power lines and a new substation will be required. However, the DEIS has no schedule for planning for PUD power improvements. **The DEIS should be revised to clarify that the costs for any short term capacity improvements to allow power for project phases 1 and 2, and all costs associated with permitting, SEPA, design and construction of new power lines, substations and any other infrastructure associated with new capacity to power the development, must be borne by the development. The DEIS should be revised to discuss the impacts of potential significant construction delays caused by poor power planning.**

Section 5.6 - Transportation

[5.6.3.1 Transportation - Direct Impacts from Construction - City of Wenatchee, Squilchuck Road Corridor, Chelan PUD Easements - Road Design:](#) The DEIS discusses construction of the proposed access road but provides no preliminary design for review. In order to justify the declared cut and fill heights, assess corridor disturbance area, and understand the magnitude of ground disturbance, **the DEIS should be revised to include preliminary proposed access road design through the existing Mission Ridge Parking lot and across USFS land to the development. The design should include cut and fill volumes, where cut is proposed to be disposed of, layout across the Mission Ridge parking lot, and proposed alignment including turnouts.**

[5.6.3.1 Transportation - Direct Impacts from Construction - City of Wenatchee, Squilchuck Road Corridor, Chelan PUD Easements - Lake Creek Fish:](#) In the discussion of construction of the proposed access road through the existing Mission Ridge parking lot and across USFS land to the development, the DEIS identifies Squilchuck Creek as fish bearing but fails to identify Lake Creek as fish bearing. Lake Creek bears fish. **The DEIS should be revised to acknowledge that Lake Creek is a fish-bearing stream.**

[5.6.3.1 Transportation - Direct Impacts from Construction - City of Wenatchee, Squilchuck Road Corridor, Chelan PUD Easements - HPA Requirements:](#) Both Lake Creek and Squilchuck Creek have been buried in culverts under the Mission Ridge Parking lot. The project proposes to construct a County highway through the parking lot and across these streams. Culvert repair for fish bearing stream crossings must be in accordance with WAC 220-660-190 which requires *“An HPA is required for all construction or repair/replacement of any structure that crosses a stream, river, or other water body regardless of the location of the proposed work relative to the OHWL of state waters”*. **Since Lake Creek is a fish bearing stream, the DEIS should be revised to indicate that both stream crossings in the Mission Ridge parking lot will require an HPA.**

[5.6.3.3 Transportation - Direct Impacts from Operation -Traffic Impact Analysis - Pitcher/Squilchuck Mitigation:](#) The TIA finds that the Pitcher Canyon/Squilchuck Road intersection will operate at level of

service D which is below the minimum County standard, but recommends against mitigation. This recommendation is irresponsible and violates [2017-2037 Chelan County Comprehensive Plan](#) goals including:

Goal 1.8 “...preserve the level of service and operations of the existing county road system” and Goal 1.9 “...deny approval of any development proposal that would cause a roadway segment to fall below the adopted minimum level of service...”

The DEIS proposes to violate Goal 1.8 by stating that decline in intersection level of service is acceptable. (The TIA shows that without the development, the intersection will be LOS A/B in 2034, but with the development, it will be LOS D). The DEIS proposes to violate Goal 1.9 by proposing that even though the intersection LOS falls below the adopted minimum level of service, that mitigation should not be done. Mitigation is required. **The DEIS should be revised to clarify that LOS D is unacceptable and that mitigation to the Pitcher Canyon/Squilchuck road is required and further that all mitigation must be complete or bonded prior to issuance of a single occupancy permit.**

5.6.3.3 Direct Impacts from Operation -Traffic Impact Analysis - Mitigation Costs: The DEIS suggests that mitigation costs should be shared between Chelan County and the developer. In the baseline condition for 2034 (a future without the development), the TIA indicates that the Methow, Pitcher, and Wenatchee Heights intersections will operate at the current level of service conditions (LOS B) and require no improvements. It is only with the addition of the development that conditions deteriorate and mitigation is required. Since no mitigation would be needed without the development, all of the costs for the otherwise unnecessary intersection improvements should be borne by the developer. **The DEIS should be revised to omit discussions of proportionate cost sharing and clarify that all required intersection improvement costs should be borne by the development.**

5.6.3.3 Transportation - Direct Impacts from Operation - Traffic Impact Analysis - Unstudied Intersections: The DEIS neglects to study intersections at Squilchuck and Kray Ike Court, Squilchuck and Saddlehorn Avenue, Squilchuck and Saddlehorn Lane, Squilchuck and Cranmer Road, Squilchuck and Halverson Canyon, Squilchuck and Lehman Road, Squilchuck and Hampton Canyon, Squilchuck and Squilchuck State Park, Mission Ridge Road and Forest Ridge Road, Mission Ridge Road and Beehive Reservoir Road and the intersection between the parking lot at Mission Ridge and the proposed new County road extension. **The TIA should be revised to include study of all roads intersecting with Squilchuck and Mission Ridge Roads.**

5.6.3.3 Transportation - Direct Impacts from Operation - Squilchuck Road Corridor: The DEIS presents two road capacity analysis approaches. These include an alternative v/c (volume over capacity) approach, and the traditional Highway Capacity Manual approach. The Kimley Horn traffic analysis is faulty for both methods.

v/c method:

Kimley Horn equates acceptable traffic levels on SR-97a (the highway between Wenatchee and Entiat) with acceptable traffic levels on Squilchuck and Mission Ridge Road, and directly compares traffic flows using SR-97a numbers to determine future Level of Service for Squilchuck Road. Clearly the Mission Ridge Road capacity is lower than SR97a's capacity. A direct comparison of vehicle flow on the Mission Ridge Road to Chelan County accepted LOS at various vehicle flow rates on SR-97a is meaningless.

Highway Capacity Manual method:

The HCM method determines percent-time-spent-following (PTSF) at the flow rates predicted by Kimley Horn. The HCM provides a table for determining expected level of service (LOS) based on PTSF. If the highway meets base conditions, then PTSF can be directly read from a chart. However, the Mission Ridge Road does not meet base conditions because no passing is possible. When the highway does

not meet base conditions, the HCM offers a more complex method of converting vehicles-per-hour to PTSF with a formula that considers an adjustment for no-passing-zones.

The Kimley Horn analysis inappropriately assumes base conditions and uses the simple chart to determine PTSF. The results presented in the 2025 TIA are meaningless as they assume the ability to pass in the opposing lane where this is not possible on the Mission Ridge Road. Appropriate analysis shows LOS D for weekday traffic in 2034 (post phase 3) which is unacceptable. Mitigation is required but is not identified in the DEIS. For context, the TIA predicted new trips generated from the development are about twice the [WSDOT traffic count](#) for 2024 annual average daily traffic on both Stevens Pass near Yodelin and on Hwy 97 Blewit Pass. **The DEIS should be revised to include an updated TIA that utilizes appropriate calculation methods to determine LOS. When the updated report indicates for all 2034 cases that LOS falls below C, then appropriate mitigation should be required. The costs for this mitigation should be borne by the development.**

5.6.3.3 Transportation - Direct Impacts from Operation - New Public Access Road: The new public access road is proposed to be 28 feet wide. As discussed in the section above, the existing 28 foot wide Mission Ridge Road is inadequate to support projected traffic within the minimum adopted rural level of service set by Chelan County. The Transportation Element of the [2017-2037 Chelan County Comprehensive Plan](#), requires that new roads include non-motorized travel and preserve the level of service and operations of the existing county road system. Therefore, the new road needs to be designed to accommodate biking and walking and to operate at LOS B minimum. **The DEIS should be revised to provide preliminary design of the proposed access road in accordance with Chapter 15 of the 6th edition of the Highway Capacity Manual to demonstrate LOS B under full buildout conditions with both bike and walk safe routes along the road between the development and the ski area. To achieve this level of service, passing lanes or multiple lanes in each direction may be required. The incorrect and persuasive reference to a single “wider” road should be deleted throughout the DEIS unless the developer chooses to construct the road wider than the HCM design dictates.**

5.6.3.3 Transportation - Direct Impacts from Operation - Summary of Impacts from Operation: The DEIS states that “...*there would not be probable significant adverse operation-related impacts on transportation...*” This is not true. Even with the faulty analysis in the TIA, level of service on Mission Ridge Road is shown to fall below LOS C and no mitigation is offered. The construction effort required to mitigate the Squilchuck and Mission Ridge Roads will be enormous. The road will need to be widened with the addition of turning lanes and passing lanes. The terrain is steep and complex and room to widen the road may not be available. Mitigation may not just be expensive, but it could be impossible. The impacts to traffic from operation of this development are both significant and unavoidable. **The DEIS should be revised to list and discuss the impacts from operation.**

5.6.3.5 Transportation - Proposed Mitigation Measures: The DEIS suggests that “...*installation of compact roundabouts at Okanogan Avenue at Crawford Avenue and S. Miller Street at Crawford Avenue intersections will be completed prior to the completion of Phase 3.*” and that additional mitigation may be required based on a future traffic study to include all 5 phases. “*The supplemental TIA will include new traffic counts, updated trip generation and distribution, and additional required mitigation measures as appropriate based on the updated assessment of project-related traffic impacts. Mitigation measures would be based on the cumulative transportation impacts of the development (Phases 1-5)*” Delaying mitigation until after phase 3 is complete puts the community at risk. It is entirely possible that the developer could complete phases 1, 2, and 3, and then decide that the mitigation cost to complete the final phases is too costly or not worth his effort. In that case, the community would be stuck with below acceptable level intersections and roads, and without any

mitigation contribution from the developer. **The TIA should be revised to require that all anticipated mitigation for all phases should be required prior to the issuance of any certificate of occupancy. The full cost should be paid by the developer or guaranteed by performance bonds of 150% the estimated cost of the mitigation.**

5.6.4 Transportation - Significant and Unavoidable Adverse Impacts: The DEIS claims that: "...there would be no significant and unavoidable adverse impacts related to transportation from construction or operation of the Proposed Project". However, If the project is constructed with only the mitigation recommended herein, a county highway will be constructed over fish-bearing streams, several intersections will become "unacceptable" according to County standards, and the Squilchuck Road will degrade from free-flowing rural to freeway-like traffic. These impacts are significant. The increased traffic on Squilchuck road is unavoidable. **The DEIS should be revised to require appropriate mitigation, and to recognize that the transformation of the Squilchuck valley from rural, to an urban development access corridor with 10,000 daily car trips to and from the development, is a significant and unavoidable adverse impact. The DEIS should move Section 5.6 Transportation from Chapter 5 to Chapter 4.**

Section 5.7 - Utilities and Public Services

5.7.1 Utilities and Public Services Overview - Water Service: The DEIS states that "*Potable water at Mission Ridge is currently sourced from on-site groundwater wells located at the Base Area.*" This assertion is true, but the action may not be legal. Mission Ridge has a permit for domestic water withdrawal from October 1 through May 1. **The DEIS should verify that legal permission to remove water in the summer months exists.**

5.7.1 Utilities/Public Services Overview - Power Service: The DEIS states that "*Chelan PUD has short-term projects that are intended to make approximately 2.0 mW available to support organic growth and potentially the first phase or two of the Applicant's proposal.*" It is not clear that the development will be paying for these short-term projects. **The DEIS should be revised to clarify that the cost of all public service extensions and capacity increases must be borne by the developer.**

5.7.1 Utilities/Public Services Overview - Schools: The DEIS discusses the development's student population, student pedestrian safety, and the capacity of the Wenatchee public schools to serve these new students. Residential development is allowed in a Master Planned Development only if such use will "*support the on-site recreational nature of the master planned resort.*" School kids playing in the development roads and school buses traveling in and out of the development and down Squilchuck Road certainly do not support the on-site recreational nature of the master planned resort. **The DEIS should be revised to acknowledge that full-time permanent residents of the development that work in Wenatchee, and whose kids live at the development and go to school in Wenatchee, do not support the recreational nature of the resort and thus conflict with approval criteria in Chelan County Code for MPR status.**

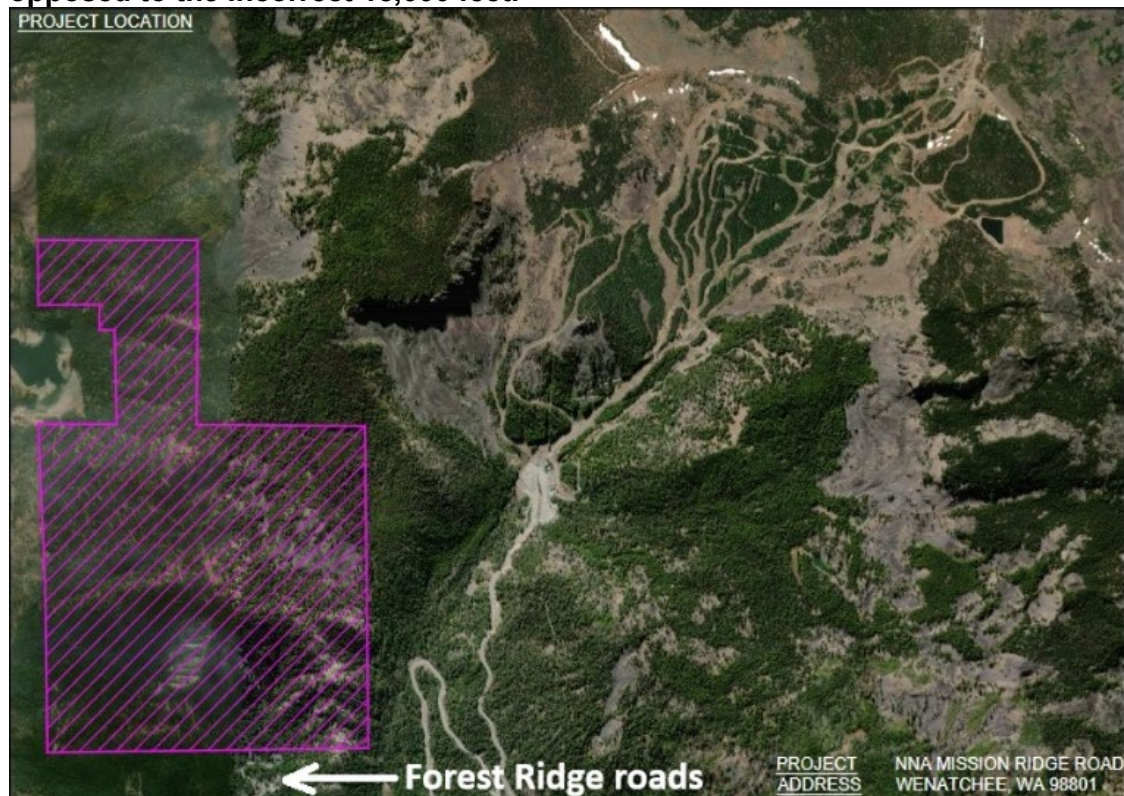
Section 5.8 - Noise

Section 5.8.1 Noise Overview: The DEIS states that:

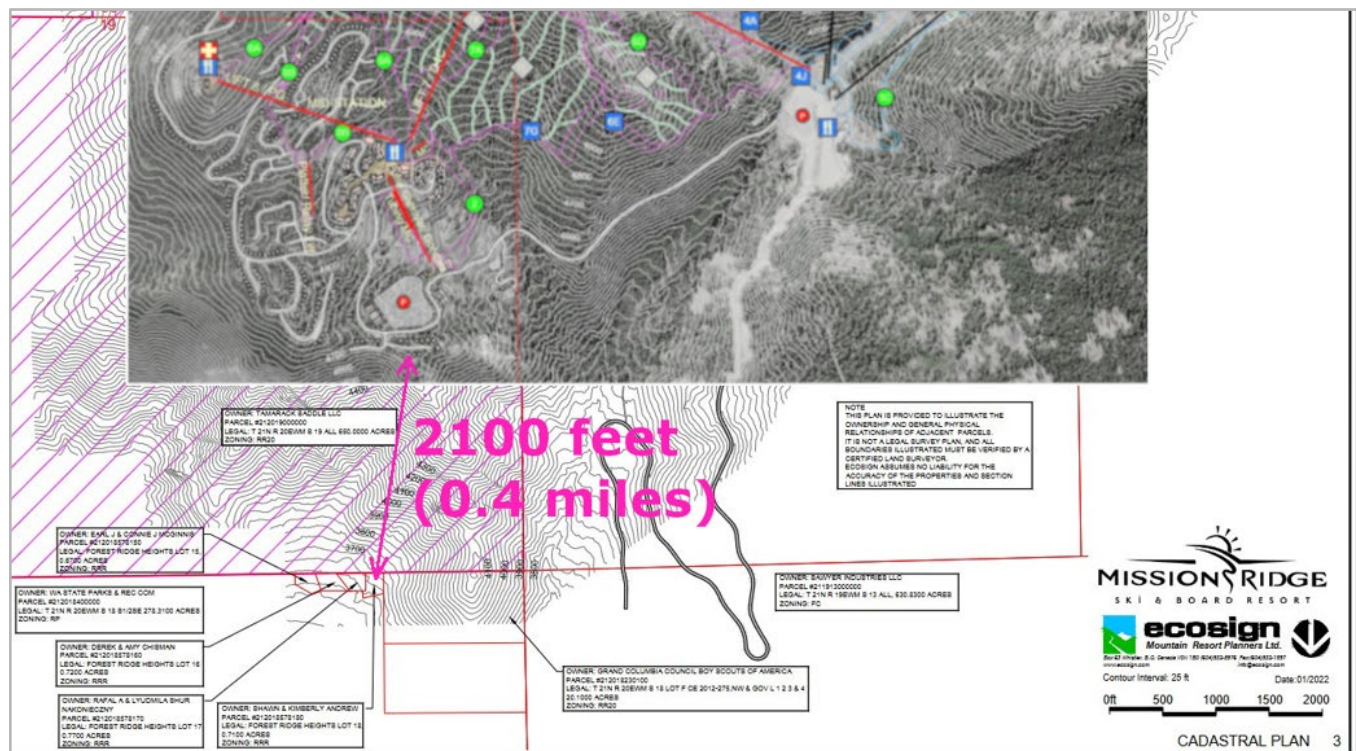
"Residences in the Forest Ridge neighborhood are more than 3 miles north of the proposed resort construction,"

This is not correct. The nearest Forest Ridge homes are roughly 0.4 miles from the development homes. The relationship between the nearest Forrest Ridge homes to the nearest proposed development homes is shown on the graphics below which are reproduced and edited from the [revised site plans](#) submitted to Chelan County in 2022. 15,000 feet is used in sound level discussion throughout the chapter. This number is erroneous and relates to the incorrect 3 mile assertion. **The DEIS should**

be revised to correct the proximity of Forest Ridge to the project from “more than 3 miles” to roughly 0.4 miles. The sound discussions should be updated to reflect the correct 2100 feet as opposed to the incorrect 15,000 feet.



Project location map from revised site plans showing proximity of Forest Ridge to the project



Cadastral Plan 3 with overlay of "Mountain Master Plan - Orthophoto 5a" from project revised site plans.

Section 5.8.3 Findings for the Proposed Project

Section 5.8.3.1 Direct Impacts from Construction: The DEIS states:

"In the short term, the Proposed Project would result in increased temporary noise associated with construction at the Project Area."

This short term is expected to last 20 years. It is deceiving to refer to a 20 year disturbance as short term.

"Noise levels from construction would be louder than the typical environment; however, the effects would be limited in duration and would not occur close to any sensitive receptors."

Excusing "louder than the typical environment" because the effects are limited in duration is insincere because the limited duration is 20 years. Limited in duration implies a short amount of time over which the disturbance can be tolerated. 20 years exceeds the life expectancy of many of the residents of the Squilchuck community.

"By the time the noise from construction at the resort reached the location of the sensitive receptors greater than 15,000 feet away in the Forest Ridge neighborhood, it would be in the 30-40 decibel range, which is approximately the sound of a soft whisper."

This analysis is incorrect because the 15,000 foot distance is off by a factor of 7.

"Noise levels from construction of the Proposed Project would not exceed prescribed levels under WAC 173-60 (Maximum Environmental Noise Levels)"

This may not be true. Using a 5 dBA reduction for each doubling in distance, the stated 89 dBA at 50 feet should translate to 64 dBA at 2000 feet at the nearest permanent sensitive receptor. 64 dBA exceeds the maximum permissible environmental noise level of 55, 57, or 60 for Class A receiving property per [WAC 173-60-040](#).

"Birds and mammals may be temporarily disturbed or displaced due to construction noise."

This is a significant impact. A 20 year disturbance will likely permanently alter the nesting patterns of golden eagles and goshawks. The noise will interrupt the hunting patterns of mountain lions, coyotes, and bobcats. It will degrade or destroy the migration path and calving grounds of mule deer and the Colockum elk herd. [Issue 71 of the Rocky Mountain Research Station Science Bulletin](#) on "How Human-Generated Noise Disrupts Wildlife" found that Elk were the most sensitive to recreation noise and that Recreation noise led to reduced wildlife presence at affected sites for up to a week after exposure.

"In summary, ...there would not be probable significant adverse construction-related impacts on sensitive receptors from the Proposed Project."

This conclusion is inappropriate. The sound impacts at the nearest sensitive receptors are miscalculated based on a gross proximity error. An impact that is expected to last 20 years cannot be dismissed by labeling it "short term, limited in duration, or temporary". The noise may exceed the WAC maximum permissible environmental noise levels. Even if noise maximums are not exceeded, just because something is legal, doesn't mean it has no negative impact. The effect on wildlife deserves an actual study, not just a single sentence declaring the impact negligible because of its temporary nature.

The DEIS should be revised to correct the sensitive receptors proximity error, conduct actual sound level calculations to determine actual effects, and eliminate language that downplays construction related noise effects simply because they are "temporary". A 20 year temporary duration will feel permanent to the affected birds, animals, and residents of the upper Squilchuck valley.

Section 5.8.3.3 Direct Impacts from Operation: The premise of the operational argument in the DEIS is that Forest Ridge residences are more than 3 miles away.

"As described in Section 5.8.1, the nearest existing sensitive receptors to the Project Area are residences that are more than 3 miles away, where the increased noise is likely to be imperceptible."

This premise is off by a factor of 7. The nearest homes are only 0.4 miles away. An analysis of noise levels should be performed using the correct distances and the conclusions herein should be updated.

The DEIS acknowledges increased noise levels due to traffic.

“Noise levels from vehicles driving to and from the Project Area would also increase due to the increase in visitors. This includes an increase in noise along the existing Mission Ridge/Squilchuck Road... The development has been analyzed to generate 9,811 new weekday average daily trips (ADTs) and 10,807 Saturday ADTs (Kimley-Horn 2023).”

But downplays the effects by arbitrarily declaring the extra traffic noise to be moderate, and by alluding to a gradual increase due to the 20 year construction period.

“Noise associated with increased traffic is expected to be moderate for sensitive receptors located along Squilchuck Road as Saturday volumes in February are expected to increase by 154% and 398% for northbound and southbound respectively. Traffic volumes will increase slowly as the development is implemented over a 20-year timeframe rather than all at once.”

The current soundscape for residents of the Squilchuck Valley who live along the Squilchuck or Mission Ridge road is a quiet rural setting with occasional traffic noise. Along Squilchuck creek, residents can hear frogs croaking, birds singing, wind in the trees, and rain on the roof. The proposed soundscape during peak hour traffic is a constant freeway-like din, with a car in each direction every few seconds which will drown out natural sounds, and possibly drive away birds and mammals. The statement about slow increase to traffic volumes appears to allude to a mitigating effect of slow exposure to the negative impact. This is insulting, as it implies tricking the rural community into accepting the urban noisecape by gradual introduction of cacophony. In addition, it is misleading. The [traffic impact analysis](#) does not break down traffic increase by phase, but it does calculate anticipated new traffic after phase 3 is complete.

Table 5: Anticipated New Trips: Phases 1-3

Time Period	Total Trips	Phases 1-3 Percentage	New Phases 1-3 Trips
Average Daily Trips	9,655	82%	7,917
PM Peak-Hour	799	82%	655
Saturday Average Daily Trips	10,766	82%	8,828
Saturday PM Peak-Hour	940	82%	770

Clip from 2024 TIA showing new traffic after phase 3

Table 1: January Volume Report Summary

Location	Thursday, January 26, 2023			Friday, January 27, 2023			Saturday, January 28, 2023			Sunday, January 29, 2023		
	Daily Volume	PM Peak- Hour	Peak Time	Daily Volume	PM Peak- Hour	Peak Time	Daily Volume	PM Peak- Hour	Peak Time	Daily Volume	PM Peak- Hour	Peak Time
Mission Street, s/o Stevens Street	16,560	1,469	4:15 5:15	17,582	1,647	3:45 4:45	14,336	1,224	3:45 4:45	12,450	1,083	3:45 4:45
Squilchuck Road, s/o Methow Street	3,543	352	4:00 5:00	4,179	445	4:00 5:00	4,630	508	3:45 4:45	3,543	367	3:45 4:45

Clip from TIA showing current daily volumes

By ratio of total estimated trips and phase completion of each component (single family, multi-family, lifts installed, commercial space installed, employee beds, hotel rooms), the trips generated by each phase are estimated below.

Trip Generation by phase - Weekdays					
phase 1	phase 2	phase 3	phase 4	phase 5	total
3740.409					3740.409
3740.409	2538.736				6279.145
3740.409	2538.736	1588.868			7868.013
3740.409	2538.736	1588.868	1497.692		9365.706
3740.409	2538.736	1588.868	1497.692	289.2943	9655
Trip Generation by phase - Saturdays					
phase 1	phase 2	phase 3	phase 4	phase 5	total
5207.895					5207.895
5207.895	2737.467				7945.361
5207.895	2737.467	1317.246			9262.607
5207.895	2737.467	1317.246	1214.332		10476.94
5207.895	2737.467	1317.246	1214.332	289.0604	10766

Estimation of trip generation by phases

Comparing current weekday daily traffic (4179 trips) to the condition after phase 1 is complete (4179 + 3740 = 7919 daily trips) shows an 89% increase in traffic after phase 1. The same comparison for Saturdays (4630 current daily trips compared with 9838 post phase 1 trips) shows traffic increases by a factor of 2.12 after just phase one. Double the traffic! This is not a slow increase to traffic volumes. This is a doubling of traffic in just the first phase of the project.

In addition to the noise impacts to sensitive receptors (inhabited homes), wildlife is also affected by noise. [A 2015 PNAS \(proceedings of the National Academy of Science of the USA\) research article "A phantom road experiment reveals traffic noise is an invisible source of habitat degradation"](#) studied the impact on wildlife of road noise in the absence of an actual road and found that noise displaced one third of migratory song birds, and that some birds that remained despite the noise experienced declining body condition and stopover efficiency.

These impacts are significant, permanent and unavoidable. **The DEIS should be revised to analyse noise impacts using the correct distances between the project and the nearest homes. The DEIS should be revised to discuss the impacts of traffic noise on residents living on Squilchuck and Mission Ridge road and on wildlife that will be affected by increased noise. The misleading language alluding to a slow increase in traffic should be deleted in light of the rapid doubling of traffic on Squilchuck Road after just phase one of the project. Because these impacts are significant and unavoidable, The DEIS should move chapter 5.8 Noise from Chapter 5 to Chapter 4.**

Section 5.10 - Recreation

5.10.3.1 Recreation - Impacts from Construction - Access to existing recreation areas: The DEIS acknowledges that the project will impact trailhead access to the popular Lake Clara trail, and suggests

that parking a mile away at the remote development is an acceptable alternative. The trail to Lake Clara is only 1.5 miles in length. To suggest that moving the trailhead parking a mile from the trailhead, for a 1.5 mile hike, is not a realistic alternative. The project site plans do not show the extension of the County Road through the Mission Ridge parking lot and do not indicate how trailhead parking will be configured. **The DEIS should be revised to include a more comprehensive picture of the final proposed trailhead condition and discussion and mitigation for interruption of trailhead parking.**

5.10.3.1 Recreation - Impacts from Construction - Quality of recreation amenities: The DEIS acknowledges that construction activity will affect the quality of visitor experience, persist over a long time, affect wildlife, and degrade people's experience in nature. The DEIS explains that because of this decreased quality of recreation experience, users will choose to go elsewhere. The DEIS then concludes that *"Because the changes in quality would be transitory and most visitors appear willing to substitute to other locations, recreation impacts would be minor."* This conclusion is arbitrary and wrong. Given that the "transitory" nature of the project is actually a 20 year duration, the idea that people can just go elsewhere to recreate is insulting. This is not a minor impact. This is significant enough that the DEIS envisions recreationalists abandoning the area. **The DEIS should be revised to provide an honest assessment of the diminished recreation quality due to construction activity.**

5.10.3.2 Recreation - Impacts from Operation - Availability of recreation amenities: The DEIS acknowledges that backcountry skiers will have to travel further or ski elsewhere in the region because of the changes to access caused by the development, but arbitrarily declares this impact minor due to the unrelated recreation created by the development. This conclusion is arbitrary and wrong. In addition to having to travel further to reach backcountry ski terrain, the recreational quality of the Stemilt and Clara basins on both sides of the ski area will be degraded by crowding. The DEIS concludes:

"Therefore, the project would benefit recreation users by increasing the overall supply of recreation amenities in the area due to the introduction of new recreation facilities during winter and expanding park operations into summer seasons without impacting the supply of recreation amenities in surrounding areas. There would not be probable significant adverse operation-related impacts on recreation from the Proposed Project."

This conclusion is also wrong. A small user group of lift access skiers and wealthy development residents will benefit from the recreation environment of the project. However, local skiers will be negatively impacted by new crowding on the hill and in lift lines, and recreation amenities in surrounding areas will be degraded for all other user groups. **The DEIS should be revised to discuss the recreational user groups that will be negatively affected by the crowding and loss of access to areas currently being enjoyed by diverse recreationalists.**

5.10.3.2 Recreation - Impacts from Operation - Access to existing recreation areas: This section of the DEIS is poorly written, misleading and persuasive. The DEIS suggests that the development "could increase traffic" which is dishonest because the TIA attached to the DEIS as [appendix I](#) estimates roughly 10,000 new trips per day to and from the development. Could implies might. The TIA indicates that it WILL. The DEIS suggests that increased traffic will reduce parking availability at trailheads, but that intersection improvements will address any impacts at recreation facilities. This is nonsense. Additional traffic potentially causing extra demand on trailhead parking is not mitigated by intersection improvements. The DEIS states *"Impacts to parking availability at trailheads would likely be minimal compared to current use patterns during most of the recreation season."* This is arbitrary and wrong. 4000 people living within a mile of the Lake Clara trailhead will increase use of the Lake Clara trail. A study of the probable impact is warranted. Declaring without argument or evidence that impacts would be minimal is persuasive writing that does not belong in a scientific document. The summary of impacts states: *"...there would not have significant adverse operation-related impacts on existing*

recreation areas, the quality of recreation amenities, or the availability of recreation amenities recreation from the Proposed Project.” This conclusion is incomplete and wrong. Squilchuck State Park impacts have not been discussed or analyzed in this document nor have other popular recreation sites including Beehive Reservoir, Mission Peak, Beehive-Liberty Road which is part of the The Washington Backcountry Discovery Route, Stemilt Basin, or Naneum Ridge. **The DEIS should be revised. The Access to existing recreation areas section of chapter 10.3.2 should be completely reworked. The section should identify the recreation areas impacted by the development, assess the impacts to those areas, and provide an honest report of the negative impacts that are probable at those sites.**

5.10.3.2 Recreation - Impacts from Operation - Quality of recreation amenities: This section of the DEIS is poorly written, misleading and persuasive. The DEIS argues that new lifts benefit recreation participants. However, the only recreationalists who benefit from ski lift operation are ski area lift skiers. This section of the DEIS is myopic to the paying guests of the resort and discounts the snowshoers, backcountry skiers, campers, bird watchers, hikers, trail runners, hunters, anglers, horsemen, and every other dispersed recreationalist who benefits from access to the public land that this resort interrupts. The DEIS claims the new lifts will decrease the time it takes to get back to the top of the mountain. This is misleading and wrong. Chairs 2, 3, and 4, which access higher elevations at the ski resort, are remote from the development and its chairlifts' high points. The DEIS claims that the new lifts will reduce congestion. This is untrue. The increase in capacity occurs in the parking lots which are proposed to have parking for 5500 people. Chairs 1, 2, 3, and 4, which are the only chairs that elevate skiers in the actual Mission Ridge basin and ski area, will have no additional uphill capacity as no improvements are scheduled. The new chairs service only the low elevation runs above the development and do not provide meaningful ski area expansion. The future condition with the development includes roughly 2000 more skiers than now, with zero uphill capacity improvements in the ski area. This means that congestion on the runs will increase and lift lines will be longer. More crowding on the same lifts in the ski area does not improve the recreational experience. The project may benefit a small subset of recreation users, that subset being beginner lift access downhill skiers. However, the project disturbs and displaces all other recreation groups that currently enjoy the quiet, rural, easily accessible public lands of the upper Squilchuck and Stemilt basins as well as the local lift skiers who currently enjoy short lift lines and relatively uncrowded ski runs. **The DEIS should be revised. The Quality of recreation amenities section of chapter 10.3.2 should be completely reworked. The section should identify the recreation amenities impacted by the development, assess the impacts to those areas, and provide an honest report of the negative impacts that are probable at those sites.**

5.10.3.3 Recreation - Indirect Impacts from Operation: The DEIS claims there are no indirect impacts from operation of the proposed project on recreation. The traffic alone impacts several recreational user groups. The Mission Ridge road is popular with road bikers, Forest Ridge residents who walk their dogs on the road, trail runners who connect the Devils Spur trailhead with the Lake Clara trailhead and then use the road to return to their car, uphill roller ski athletes use the road for summer training. All of these user groups will be displaced by 10,000 car trips per day which will make the Mission Ridge road unpleasant and unsafe for recreation. In addition, the noise from the traffic will impact recreationalists on the Lake Clara trail, the Devils Spur trail, and mountain bike riders on the trail system at Squilchuck State Park. **The DEIS should be revised. Contrary to the conclusion of this chapter, operation of the project creates indirect impacts on recreation. The DEIS needs to identify and discuss the indirect impacts on recreation from operation of the Proposed Project. If these impacts are found to be significant and unavoidable, then the DEIS should move Section 5.10 - Recreation from Chapter 5 to Chapter 4**

5.10.4 Recreation - Significant and Unavoidable Adverse Impacts: The DEIS claims there are no impacts on recreation from operation, and only minor impacts during construction which don't count because they are temporary and localized. Several direct and indirect adverse impacts from operation have been identified including crowding at the ski area, displacement or degraded experience of dispersed recreationalists including backcountry skiers, snowshoers, campers, bird watchers, hikers, trail runners, hunters, anglers, and horsemen. Impacts include the loss of Mission Ridge road availability for road bikers, dog walkers, and roller ski athletes. In addition, it is not accurate to downplay impacts from construction simply because they are temporary and localized. Temporary means 20 years for this project, and localized refers to the entire Squilchuck & Mission Ridge Road corridor, Squilchuck State Park, the Lake Clara basin, and the upper Stemilt basin. The Wenatchee valley enjoys unique access to the Wenatchee Mountains via a paved road all the way to the base of the mountains. Most communities do not have this amazing and easy access to alpine environments. This project affects access to the Wenatchee Mountains for every visitor using the Squilchuck and Mission Ridge roads. **The DEIS should be revised to acknowledge the negative impacts from construction and operation. Many of these impacts are unavoidable. If they are also found to be significant, then the DEIS should move Section 5.10 - Recreation from Chapter 5 to Chapter 4.**

Thank you for considering my comments.

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