

October 21, 2025

Via E-Mail: missionridgeeis@outlook.com

Mission Ridge Expansion Master Planned Resort Draft EIS
Mike Kaputa, Director
Chelan County Natural Resources Department
411 Washington St., Suite 201
Wenatchee, WA 98801

**MISSION RIDGE MASTER PLANNED RESORT DEIS
PUBLIC COMMENT**

Dear Mr. Kaputa:

Please consider the following comments regarding the Draft Environmental Impact Statement (DEIS) presentation and characterization of fire risk with the Mission Ridge Master Planned Resort (MPR) ("Project"). Specifically, I am commenting because I am concerned with the DEIS Major Conclusions on Page ES-13 which states that the Project would have "probable significant adverse impacts" with regard to fire risk.

The conclusion appears to rely upon DEIS Section 4.2 Fire Risk, which among its highlighted "key findings," states that the Mission Ridge MPR would have "[S]ignificant and unavoidable impacts related to fire protection that cannot be completely avoided due to the remote location of the site, the prevalence of fire risk locally, and the increased population that is subjected to that risk."

To "completely avoid" impacts to fire protection is an unreasonable standard. There are necessarily impacts related to fire protection for any development. Additionally, with (or without) any development there is fire risk. The apparent standard by which the DEIS assessed the Project with regard to fire risk is unreasonable. Instead of focusing on whether fire risks can be completely avoided, the DEIS should focus on whether the project, as mitigated, will have probable significant adverse impacts on fire risk.

DEIS GRAPHIC 4.2-1

We appreciate the conclusions presented in "Project's Anticipated Effect on Fire Risk" as illustrated in DEIS Graphic 4.2-1, summarizing that the "Project's Effect on Fire Risk" will **reduce** fire risk across 6 categories.

However, the subject graphic does not depict comparative fire risk without the Mission Ridge Master Planned Resort (MPR). Further, it is unfortunate both red arrows inaccurately represent Project fire risk.

For example, DEIS Graphic 4.2-1 states, “Climate change and droughts are increasing fire risk,” and identifies that the Project is increasing this effect. Climate change and droughts are natural phenomena; the Mission Ridge MPR will not alter the climate. Graphic 4.2-1 should be revised to either delete the climate change line or otherwise show that the Project will not alter changes in fire risk attributable to climate change and droughts.

Graphic 4.2-1 also asserts, “Population/visitor increases will increase fire risk.” However, while the quantity of ignition sources may increase with the Project, the consequences of a fire are much lower with Mission Ridge MPR’s proposed mitigation measures. Conversely, without the Project, though the quantity of ignition sources may be less, the consequences of a fire could be far more severe.

Considering Mission Ridge MPR’s mitigation measures, the first line of Graphic 4.2-1 should be revised to represent the Project’s effect on fire risk as a neutral condition rather than a red arrow. And the associated comment should read, “Population/visitor increases may increase fire probability, but proposed mitigation measures reduce severity.”

Also, the “Project’s Effect on Fire Risk” column in DEIS Graphic 4.2-1 appears to be stated relative to the “No Action Alternative” described in Section 4.2.5. However, that “No Action Alternative” contemplates no development. The land is zoned RR20 and FC, both of which provide for development of many permitted uses, including agricultural processing facilities, permanent housing for agricultural workers, farm visit and U-pick operations, as well as single-family homes, bed and breakfasts, or cluster subdivisions (ref. Chelan County Code, Chapter 11.04).

Accordingly, the “No Action Alternative” should anticipate potential uses and hazards associated with further development which would warrant the same concern expressed in DEIS Section 4.2.4: development would attract more people to an environment which is, at times, a high-risk location. However, such development with the “No Action Alternative” could omit safeguards and mitigation measures present with the Mission Ridge MPR. The DEIS should be revised to clarify that the reductions in fire risk represented in Graphic 4.2-1 are not obtained in the No Action Alternative.

HAZARD RATING

As identified on Page 4-20 of the DEIS report, our quantitative analysis using 2018 IWUIC (International Wildland Urban Interface Code) criteria yielded a “high hazard” severity rating for the Project. The DEIS acknowledges this rating is consistent with other reports for the area. However, this quantitative analysis involves Mission Ridge MPR incorporating use of ignition-resistant construction, including noncombustible siding and Class A roof material, which is not otherwise required by Chelan County.

Without the Mission Ridge MPR, development could occur in the area following a “No Action Alternative” without incorporating the safeguards proposed by Mission Ridge and result in an “Extreme Hazard” IWUIC score.

CONCLUSION

The DEIS should focus on whether the Mission Ridge MPR, as mitigated, causes probable significant adverse impacts on fire risk compared with the risk in the absence of the project. Fire risk is present with or without development. The Mission Ridge MPR incorporates mitigation measures reducing fire risk which need not be part of other development that could follow a “No Action Alternative.”

The DEIS should be revised to state that the Project’s impacts on fire risk are mitigated below a level of significance.

Please contact Brian Thompson by e-mail at BrianT@AEGISengineering.com or by phone at 425.745.4700 x105 for any clarification of the information presented in this document.

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