

October 21, 2025

Comments on proposed Mission Ridge Expansion Master Planned Resort Draft EIS

Mike Kaputa, Chelan County Department of Natural Resources

411 Washington St. Suite 201

Wenatchee, WA 98801

Dear Mr. Kaputa,

The Chelan County Department of Community Development that it is accepting comments regarding the proposed Mission Ridge Master Planned Resort Expansion Draft Environmental Impact Statement. I am concerned about the impact this project will have on the environment and the community and appreciate the opportunity to offer these comments.

The Draft Environmental Impact Statement fails to capture impacts to wildlife, public safety, roads and access, energy, and water use. The proposed project area is in a known area of potential geologic hazards and historical landslides. Chelan County Code (CCC 11.86.070) should require an updated geological site assessment and geotechnical report to fully assess the potential risks and per CCC (11.77.0101 (3)), when technology cannot reduce risks to acceptable levels, building in geologically hazardous areas is best avoided. The geological hazards should be fully assessed and properly reduced and mitigated for before adopting the EIS, and the County should not permit a project to move forward that could endanger the lives of people and cause environmental destruction from landslides. The Energy and Natural Resources section includes site plans that are contingent upon the outcome of a programmatic-level review that is part of the Chelan PUD long-range planning process and may include new/alternate transmission lines and a power substation that will be necessary to serve later project phases. It is impossible for the public to evaluate the environmental impacts associated with phases 3-5 of this project because the spatial configuration of new transmission lines and a new power substation is not provided in this DEIS. The County should not allow this development to move forward without all impacts known and made to follow applicable mitigation requirements and permitting requirements as outlined by federal, state, and local agencies.

Preservation of open space as a primary component of the Proposed Project' (DEIS Vol, 5-64). Per Chelan County Code 14.22.080, the purpose of 'Open Space' is for maintaining, preserving, conserving, and otherwise continuing in existence open space lands for the production of food, fiber and to assure the use and enjoyment of natural resources and scenic beauty for the economic well-being of the state and its citizens. RCW 84.34.020 provides classifications for 'Open Space' that include open natural areas, farm and agricultural land, and timberland. It is unclear how a 'For-Profit' recreational and residential development aligns with either the state or County definitions for 'Open Space'.

This project is a major development that will fragment a contiguous forested landscape to For-Profit recreation, develop residential areas, and retain acres that are zoned as 'Commercial Forest' to suffice 'Open Space' without any plans to use that forest for future harvest (Vol.1, 5-64). It is unclear how this use aligns with CCC 14.22.080 or RCW 84.34.020. The short-term construction impact, long-term operation, and increased year-round human-use impacts associated with the proposed project would result in a net loss of 'Open Space'. The fractions of lands within the Project Area that will not be permanently converted to non-forested habitat will have degraded habitat values and functions and

contribute to the fragmentation of this landscape. Numerous studies have shown that habitat fragmentation isolates patches of open space, leading to reduced species diversity, and lower overall quality of ecosystems. The DEIS should not count lands that will be managed to support and protect residential development as 'open space'.

The wildlife and habitat assessments found within the DEIS are not accurate, and the conclusion that this massive development would not impact elk calving grounds is egregious. The County is responsible to meet the need to "identify, protect, and maintain the present high quality of Chelan County's fish and wildlife habitat conservation area" (CCC 11.77.010 (4)). The notion that this project will not destroy habitat for deer, elk, forest birds, large carnivores, amphibians, bats, small mammals, and rare and sensitive plants goes against all science around the devastating impact that habitat fragmentation and loss has on species biodiversity, and the increase in human use, human-conflict, and year-round recreation will all further degrade this unique environment. The DEIS focuses on short-term impacts to species from construction and lacks an analysis of long-term impacts. This dismisses the massive amount of habitat destruction, direct mortality, and disruption of essential behaviors (e.g., foraging, breeding, migrating) the proposed project would cause.

Chelan County Code 11.77.010(1) says that protection of wetlands should first be achieved through regulating land use to avoid adverse effects on wetlands and to maintain the functions and values that wetlands provide. Adverse effects would include isolation of the wetlands by surrounding development, reducing species' access to the wetland habitat.

This DEIS does not consider the long-term impact that developing permanent residential housing and increased summer recreation use would have on increasing the risk of catastrophic wildfire. The fire protection plan describes the extreme fire hazards that this development would present given the steep topography, the isolated location, the high potential for wildfire. Section 104.8 of the International Fire Code (IFC) allows the fire code official to grant code modifications for individual cases when the code is impractical. Appendix D describes extensive code modifications and waivers be applied for the International Building Code (IBC), International Fire Code (IFC), and Chelan County Code (CCC) provisions to overcome the 'challenges inherent with the development'. The intent of these code modifications is to address existing infrastructure that does not meet current code requirements, not provide an avenue for future developments to circumvent the safety requirements inherent to the code. Currently, there is no threat to life and fire safety should a wildfire event occur in the Project Area. Applying code modifications to support development of an area that cannot meet the safety requirements is creating a hazard for humans and the environment. During the fire season, the safety of village residents and visitors will be endangered if the County does not follow its own codes by insisting that there be two separate means of entering and exiting the development. The current site plan fails to demonstrate how the proposed project will overcome the single access route in/out and will require substantial revisions, for which we cannot adequately evaluate the impacts of as this is not represented in the current DEIS. I think the County should require that elements of this project that do not have accurate water budget accounted for in the current site plans be removed from the final EIS and not move forward until these details can be measured and evaluated.

I also share the concerns of the Squilchuck-Miller Water Users Cooperation, the Squilchuck Water Users Association, and the Beehive Irrigation District. The detailed history of water availability provided underscores the conclusion that there is not sufficient water available to support the proposed

expansion. Allowing this project to move forward prior to a thorough water budget that accounts for all water use needs across all 5 phases of the proposed project, risks depleting the aquifers that are critical for maintaining surface flow in Squilchuck Creek.

Sincerely,

Matthew Dowling