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Our Comments on the Mission Ridge DEIS

Chelan County and Aspect Consulting have done a commendable job in formulating and compiling the DEIS. However, there are issues that need to be further addressed. There are instances in the DEIS where decision making information is based on past (invalid), incomplete or possibly biased data. SEPA environmental decision-making information must be based on current information and not on past data when they differ. *Recommended changes to the DEIS are depicted in italics.*

Project Timing and Impacts:

With the number of houses, auxiliary buildings and supplemental infrastructure needing to be evaluated, designed, developed and permitted, the twenty-year timeline is unrealistic. ***The DEIS needs to reflect that with the short development timeline, all phases of the project must be evaluated as a whole before the first phase is permitted.*** The proposed MPR is essentially a new city and must be treated as such and not as an extension of an existing one.

Environmental and other impacts of the proposed MPR must be accounted for in the DEIS on the surrounding area and not just on the property proposed for development. Some have, some have not and some only partially. Some of the impacts relate to the Stemilt-Squilchuck Community Vision, wildlife and wildlife habitat outside of the development, normal community, on site recreation and concert noise within the MPR impacting wildlife and adjacent properties, nightly light pollution from the MPR, increased traffic on surrounding roads, increased risk of wildfires, lack of serenity for recreators on adjacent properties, potential loss in hunting opportunities and loss in water for downstream users.

Stemilt-Squilchuck Community Vision:

The Stemilt-Squilchuck Community Vision evolved in 2008 from a group of agriculture, land owners, wildlife, recreation and conservation interests in Chelan County and the vicinity to identify shared goals and key strategies for the Stemilt-Squilchuck watershed which the MPR is part of. The goals that were agreed upon for the watershed were: 1. Protect Water Resources, 2. Conserve Wildlife Resources and 3. Maintain and Enhance Recreation Access to those lands. The guiding principles evolved into the Stemilt-Squilchuck Community Vision Report. ***The DEIS needs to reflect that the proposed MPR is contra to those principles.***

The DEIS partially addresses the conservation of water resources in the Stemilt-Squilchuck watershed in that Chelan PUD water is proposed to be acquired and used for MPR development Phases 2-5 versus on-site wells and that residual water from the development will be infiltrated into the watershed. The soils within the development, however, are not conducive to infiltration and therefore the residual water, from a waste water treatment plant, is proposed to be dumped into Squilchuck creek. Water going into Squilchuck creek will only benefit downstream irrigators and the fish there in and will not replenish the

aquifer. There will also be a significant loss of water from the watershed due to evaporation from the denuded MPR project lands where vegetation is removed for ski runs, lift infrastructure, roads, housing and other buildings. The DEIS only accounts for evaporation from a reservoir. The loss in water due to evaporation from both sources may result in a significant reduction of the aquifer and would impact downstream reservoirs, wells and irrigation users. ***The DEIS needs to be revised to reflect the loss of water from the watershed due to evaporation from the MPR project lands.***

The DEIS needs to be revised to reflect that the MPR project does not conserve wildlife as the Stemilt-Squilchuck Community Vision envisioned. The MPR development eliminates wildlife habitat and therefore does not conserve wildlife. The DEIS makes light of the conservation of wildlife in that it reflects wildlife can just go elsewhere. The section herein on Wildlife and Wildlife Habitat expands on this and contains additional recommendations for revisions to the DEIS

The MPR's normal community, on site recreation and concert noise and nightly light pollution will displace and may result in a loss of wildlife from diseases if they are displaced into crowded habitat. Depending upon where wildlife is displaced to, there could be a reduction in recreational hunting opportunities on adjacent properties. The noise and light pollution would also cause a loss in serenity for recreators, hunters and residents on adjacent properties. The DEIS states that the closest noise receptors are three miles away and therefore they will not be impacted. Noise extends outward from the source by air-miles not by vehicle miles. The Upper Wheeler Reservoir area, which is used by recreators, is next to the cross-country ski trails that are proposed by the MPR for recreation by motorized vehicles during snow free months. The Scout-A-Vista Boy Scout camp, the Forest Ridge housing development and the Squilchuck State Park are all on Section 18 adjacent to the MPR and are within about one-half of an air-mile from the development. A distance of three air-miles involves most of the recreation lands in the Stemilt-Squilchuck Basin and many additional residences in the Squilchuck valley. Light pollution extends for many miles as the DEIS infers from evaluating light from night time skiing on Wenatchee and East Wenatchee. The Wenatchee valley already has significant light pollution and a lack of "dark skies". ***The DEIS needs to be revised to reflect that there will be a negative impact on wildlife and recreation from MPR noise and light pollution in the Stemilt-Squilchuck Basin contrary to the objectives of the Stemilt-Squilchuck Vision and that the noise and light pollution will be detrimental to adjacent residents.***

The increased skiing opportunities and proposed summer recreation on the MPR project lands will enhance recreation in the Stemilt-Squilchuck Basin. Unfortunately, the proposed skiing opportunities will decrease wildlife habitat and the proposed summer recreation will create disturbances to wildlife. Both will have a negative impact on wildlife – see the section herein on Wildlife and Wildlife Habitat.

Potable Water:

While it may be possible to find wells and have them approved that would produce 90 AF/Y of potable water for Phase 1 of the development, the extraction would be a detriment to the springs in the area that supply water for flora and wildlife through a reduction in the aquifer in late summer, downstream wells, downstream irrigators (currently they get restricted to less than their water rights during late summer due to low stream flows) and an unnecessary expense when Chelan PUD water will be needed for Phases 2-5. The twenty-year project timeline indicates there would only be about a four-year gap between the start

of Phase 1 and 2. If well water is used, a treatment plant, to ensure that the well water is safe for human consumption throughout the life of the project, must be required. ***The DEIS should be revised to reflect that Chelan PUD water will be required from the beginning and the MPR developer pay for all improvements needed to the existing waterline and the extension of the waterline to the MPR.***

An enclosed potable water storage reservoir must be built with adequate height for gravity pressurization and have the capacity needed for the MPR and the reserve capacity required for firefighting whether the water comes from wells or from Chelan PUD. The reservoir must be in operation for Phase 1. Without a gravity-fed reservoir, a power outage would make a pump-operated potable water system inoperative.

Water for Snow Making and Location of the Reservoir:

For the new snow making reservoir that is proposed to be built on Section 30, the DEIS stated that 150 AF/Y of water would be used from it for snow making. ***The DEIS needs to identify the size of the reservoir (acreage and capacity), the source of the water for filling it and what percent of the Mission Ridge's water rights are being used to fill it – initially and yearly.***

The proposed location for the reservoir is in a prime wildlife migration corridor and habitat and is in a significant stand of old growth timber. ***The DEIS should be revised so the reservoir is located elsewhere out of wildlife habitat and old growth timber.*** Maybe close to the MPR housing and pumped to the snow making cannons.

Skiing:

The DEIS needs to identify the current number of downhill skiing acres, the proposed number of additional downhill skiing acres, the acreage for the cross-country skiing area and that for the sledding and tubing area.

Mission Ridge's Water Rights

The DEIS needs to identify Mission Ridge's water rights, the amount of water currently used and any seasonal restrictions. The DEIS only states that they will not exceed their water rights. Downstream users are often restricted to less than their rights in late summer due to the limited amount of water in the Stemilt-Squilchuck Basin. Mission Ridge should also have similar restrictions if they don't.

Electric Power:

Since the 2023 Chelan PUD estimate projects an adequate reserve in the Chelan PUD distribution system for Phase 1, the delay in locating and building a substation during or after Phase 1 is feasible providing the start of the MPR is not significantly delayed beyond the PUD's timeline. ***The DEIS should reflect that the substation and infrastructure must be completed before Phase 2 is started. Because of the short development time frame, the developer of the MPR should bond 150% of the projected cost for the portion of the substation and infrastructure improvements needed for the MPR at the beginning of Phase 1 and incur all Chelan PUD costs associated with electric power reaching the full MPR.***

Sanitation:

The proposal of using septic systems, OSS and LOSS, for the development was found for the previously proposed development on Section 19 to be infeasible due to the soils in the project area being unsuitable for infiltration. While septic system technology has improved, the soils have not. The small lots proposed for this MPR worsens the feasibility of using individual septic systems. ***The DEIS should be revised to reflect that all buildings should be on a sewer system with a waste water treatment plant from the beginning of the development.*** Part of the treated effluent from the WWTP could be stored in a nearby reservoir and used for irrigation and snow making and therefore eliminate the need for the proposed snow making reservoir on Section 30.

Fires:

The wildfire evaluations referenced in the DEIS only included some of the wildfires and only the recent low wind wildfires that occurred in the vicinity of the MPR and were optimally controlled. Winds in the vicinity of 100 MPH have been recorded at Mission Ridge. There were two large wind driven wildfires that occurred near the MPR and were not considered – the 2013 Colockum Wildfire and the Table Mountain Wildfire. Wind driven wildfires advance rapidly and cause significant property damage and loss of life – see the Lahaina, Gray, Oregon, Malden, Pearl Hill/Cold Spring Complex, and the 2015 Sleepy Hollow fires as examples. Even with multiple avenues of escape many lives were lost in some of those fires.

The 28% reduction in combustible fuels, as stated in the DEIS as a fire risk reduction benefit, does not account for the much larger addition of combustible material added by the 886 homes, the 57-room hotel, the 80-bed employee housing and the other assorted buildings. While the buildings will be built with fire resistant materials, they are not fireproof. They will be tightly spaced and can become an inferno in a wind driven fire, either from an adjacent wildfire or from a fire in one house propagating to adjacent ones – see Lahaina, California and recent Washington wind-driven wildfires as to how rapidly they propagate.

The Fire Wise procedures in the DEIS will help control fire spread, but not eliminate it. The use of parking lots in the MPR as safe areas are inadequate in wind driven fires. Since a second exit from the MPR has been deemed infeasible and since there is only one path to the Wenatchee area (the marginal MPR road, the steep Mission Ridge Road and the Squilchuck Road) the MPR has the potential to be a catastrophic disaster if that path is blocked and not useable. In addition, the ability of responders to access a fire by vehicle will be eliminated.

The proposed fuel break in the DEIS may only have a minimal impact on stopping a wind driven fire, either one burning towards the MPR or one from within the MPR burning towards the lower reaches of the Squilchuck. The Labor Mountain fire jumped highway 97 and the fire break that was built along it in moderate 30 to 40 MPH winds on Sept 25, 2025.

The proposed Fire Wise procedures and the fuel break will eliminate wildlife habitat and they both will need to be maintained to be effective.

The expected human activity at the resort during the summer months will increase the probability of a fire. Some fires are caused by lightning; however, the majority are caused by humans.

Since the MPR is already considered to be in a high fire risk area, the DEIS needs to be revised to consider the additional risk from wind driven fires - both wildfires and fires originating within the complex, and reevaluate the fire risk for that area.

The fire station proposed in the DEIS needs to be manned 24/7 if it is to be effective. Volunteer fire fighters, as proposed, would not be useful unless they are onsite. It is too far from the Wenatchee area for volunteers, if they are there, to control a fire within or adjacent to the MPR before major destruction would occur. ***The DEIS needs to be revised to require either a manned fire station or the volunteers be onsite for their shift. The expense of the fire station, equipment and manning the fire station should be borne by the MPR.***

Fire extinguishers and sprinkler systems must be in every structure. Not either or as currently stated in the DEIS.

Since the MPR is located in a high fire risk area, insurance companies should be contacted and surveyed as to their willingness and the feasibility of providing fire and liability insurance for the MPR and if they will continue to provide insurance, at pre MPR risk level, for the downstream properties and the results included in the DEIS. An uncontrolled fire could not only wipeout the MPR, it could also eliminate the wildlife habitat there and in the Colockum and Stemilt-Squilchuck Basin, other adjacent properties and downstream residences. The loss of insurance for downstream properties due to the presence of the MPR would devalue those properties. If a fire should occur, they could lose everything without insurance.

Wildlife and Wildlife Habitat:

Much of the wildlife data used in the MPR DEIS is out of date and not representative of current conditions.

In contrast to statements in the DEIS that most of the MPR habitat is unsuitable for deer and elk, recent camera studies show wildlife using the habitat and that the MPR project area appears to be viable summer habitat for the Stemilt-Squilchuck deer and elk herd and other wildlife. Two recent camera studies show the extensive use and dependency of that habitat by wildlife, both endangered and nonendangered – the “Mission Ridge Trail Camera Survey, 2024 and 2025 Wildlife Survey in the Stemilt-Squilchuck Basins” by Friends of Mission Ridge (FOMR) and the “Stemilt-Squilchuck Elk Camera Study, Elk Movements, Calving and Time of Use” by Bill Gaines et al, July 2022. The first study can be viewed on the FOMR website <https://www.friendsofmissionridge.org>. The FOMR presentation also has excellent recommendations for updating the DEIS and depicts that pika, northern goshawks, golden eagles and dusky grouse habit the area in contrast to statements in the DEIS that they don’t. ***Both of the recent studies had limited cameras on or adjacent to Section 19 and further wildlife studies need to be done to enhance those studies within the MPR boundaries and on the properties surrounding the MPR, especially those postulated in the DEIS to have alternate habitat that the Stemilt-Squilchuck deer and elk can move to, and evaluate what may be a significant negative impact on wildlife from the MPR development. The new studies need to account for all possible wildlife, not just deer and elk. The additional studies need to be completed and the DEIS updated before any MPR approval, permitting and development takes place.***

The new studies need to be done since the DEIS statements are based on old studies in which the wildlife had a much larger habitat in the Stemilt-Squilchuck Basin than they do now and therefore contradict

the information obtained by the recent camera studies. The wildlife usage in the Basin is evolving due to major habitat changes and encroachment by development in the Stemilt-Squilchuck drainages.

The DEIS postulates that the Stemilt-Squilchuck deer and elk, if forced out by the development, could easily move to properties in the Colockum Wildlife Area. Those properties are already used by the Colockum deer and elk herds. The Stemilt-Squilchuck deer and elk herd is a separate herd from the Colockum herds and as such use different habitat. With the increased usage from both herds, the Colockum habitat would deteriorate from overgrazing and use. Compacting deer and elk into smaller habitats increases the likelihood of CWD or other diseases infecting them. With the current trend to a warmer climate, the need for the habitat within the MPR project by wildlife will only increase and as natural snowfall decreases it could also become important winter habitat. Already animals are using it, as depicted by the FOMR camera study, into early winter rather than migrating to the lower elevations. With the addition of the wildlife fences in the lower Stemilt Basin blocking animals from the lowest elevations and the increased winter recreation in the mid elevations disturbing them, the animals are tending to use the undisturbed higher elevations for as long as they can. The 2022 orchard development on Section 17 has also reduced the available habitat in the valley and has had an impact on where the Stemilt-Squilchuck deer and elk range. These impacts have all occurred since the old studies, upon which the DEIS is based, were made.

All wetland areas within the MPR project area and the adjacent properties also need to be evaluated as to the flora and amphibians that live there, which of them need protection, and what wildlife use the wetlands. In addition, the streams within the MPR need to be reevaluated to see if they have fish in them. These studies also need to be completed and the DEIS updated before any MPR approval, permitting and development takes place. Depending upon use – either for drinking, bathing or wallowing, the wetlands may need to be preserved rather than filled and bulldozed over as proposed in the DEIS. Elk wallows are critical habitat.

If the extensive cross-county ski trail system and the other trails on the MPR area, that are proposed for summer recreation, are used when snow free or nearly so wildlife will be driven out of the MPR project area. The above referenced camera studies show that the habitat encompassing the proposed trail system is heavily used by wildlife. Numerous studies have shown that there is a dead zone for one hundred meters on either side of a trail – see “Leaving Only Footprints? Think Again” by Christopher Solomon, The New York Times Feb 13, 2015. The FOMR Trail Camera Survey also depicted that animals are affected and displaced by nearby disturbances - both from acoustic and the presence of humans. ***Therefore, the DEIS should be revised to reflect closure of the MPR proposed trails to summer recreation, not only during the calving/fawning season as proposed in the DEIS, but throughout the snow free season in order to not displace wildlife from the MPR project area.*** The WDFW Section 25 has had a closure, May through October, on it since its inception so that wildlife there is not disturbed. The restriction was part of the agreement for obtaining Pittman-Robertson funds, acquired from Federal taxes on sporting goods for the preservation of wildlife, to purchase Section 25.

The DEIS needs to be revised to reflect the most recent estimate and findings (by Rossman in 2022) for the size of aspen groves on the MPR project – two groves, one of 1.5 acres, PHS habitat, and one of 0.2 acres.

The DEIS needs to be revised so all of the existing white bark pine trees in the MPR project area are preserved and protected. They are listed as a federally threatened species. Planting white bark pine seedlings, as proposed in the DEIS, as mitigation for removing 27% of the white bark pine trees from the MPR project lands is not justified nor a viable trade – it takes too long for a white bark pine tree to grow. With the current warmer climate, planting new seedlings and having any survive may not be achievable. Especially after all of the proposed denuding of the vegetation on the MPR project lands for ski runs and housing takes place. The reduced vegetation will lessen the moisture being retained in the soil following snow runoff.

The DEIS needs to reflect adequate buffers are used to protect and preserve all of the old growth timber, aspen groves and white bark pine trees from construction and occupation of the MPR development.

MPR Access Road:

The DEIS needs to be revised to reflect that the only access to the MPR development from Wenatchee is the single passage along the Squilchuck, Mission Ridge and MPR roads, the projected usage of 10,000 vehicle trips per day on it at full build out, and that that passage is the only means of ingress and egress to and from the MPR in emergencies by vehicle. Therefore, those roads need to be brought up to current road standards for the expected usage and paid for by the MPR developer. Since they are the only emergency egress from the MPR, they need to be upgraded before occupancy is approved for the first Phase of the project.

The DEIS should require an investigation and evaluation of wildlife migration corridors along the Squilchuck, Mission Ridge and MPR roads to determine if signage, fences or a wildlife over pass is required to minimize wildlife vehicle collisions.

Thank you for considering these issues in formulating the MPR SEPA document,

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