

October 20, 2025

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

missionridgeeis@outlook.com

RE: Mission Ridge Expansion Master Planned Resort Draft EIS

Dear Mr. Kaputa,

I have reviewed the Draft Environmental Impact Statement (DEIS) for the Mission Ridge Expansion Master Planned Resort and am concerned that the environmental analysis included in Volume IV: Appendices G – L does not meet the professional standard of care for a SEPA Environmental Impact Assessment, especially concerning the analysis of potential impacts on vascular and non-vascular plant species in the area.

Specific issues noted with the analysis include:

- The DEIS does not consider potential effects of the proposed project to non-vascular plant species, fungi, or lichens. Please include an analysis of effects to these species.
- Neither the DEIS nor the Plants and Animals Report reference the Washington Natural Heritage database of known rare plant locations. This is a huge gap in analysis of available data. This database is publicly available and should be consulted. While extremely helpful, it should be noted that this database only includes known populations of plants - there may be additional populations present that WNHP is unaware of, if the areas haven't been thoroughly surveyed.
- Neither the DEIS nor the Plants and Animals Report acknowledge that these documents detail only known populations of special status plants, and that it is probable that there are as-yet-undetected populations of special status plants within the project area that will be effected by the proposed project. In fact, the Plants and Animals Report states that "no specific impacts on rare plant species from the Proposed Project are expected. This is primarily because no other rare plant species have been identified in the study area." Recommend: DEIS should acknowledge that surveys for special status species in the project area are limited, and there is a possibility that undetected populations may be impacted by the project.
- Table 5.4-1 includes only vascular plant species that are federally protected under the Endangered Species Act and species with special status with WA state. The DEIS should also consider ISSSP (Interagency Special Status Species Program) species that are protected by the USFS.
- Table 5.4-1 only includes 5 plant species of concern that "potentially occur near the study area". This is inaccurate. The species listed in the table are apparently species that are known to occur near the study area. The term "near" is not defined; thus, it is unclear what distance from the project area these species have been found. There are several state-listed species that have potential to occur within or near to the project area that are not included in Table 5.4-1 (see WNHP database mapping). Recommend: the DEIS should further explain how this list of plant species was developed; Table 5.4-1

should include species that are known to occur AND have potential to occur in the study area because they exist within 5 miles in the Wenatchee Mountains; and the DEIS should thoroughly analyze potential impacts to these species.

- DEIS does not analyze impacts of increased recreation to whitebark pine or other plant species. Please describe how increased recreation and visitor use would impact individual whitebark pines in the project area, and the wildlife that facilitates dispersal of whitebark pine seed.
- Table 5.4-2 and 5.4-4 do not include the special status plant species listed in Table 5.4-1 other than whitebark pine, therefore the DEIS does not describe potential construction and operations impacts to special status plant species other than whitebark pine. The DEIS does not fully explain the effects of construction and operation impacts to known and undetected populations of special status plants.
- Proposed mitigation (section 5.4.3.4) for impacts of disturbance to whitebark pine (planting 1305 seedlings and maintaining for 5 years) does not account for loss of future seed from adult trees. Replacing adult trees with seedlings will remove seed source of whitebark pine in the project area for decades until seedlings are old enough to reproduce; thereby reducing the local whitebark pine populations' viability and ability to sustain in the future. The DEIS mitigation strategy should include planting seedlings at a much higher rate, seedlings should be planted onsite, and maintained for the lifetime of the proposed project – 20 years.

Without sufficient analysis of the impacts on plants in the project area, I urge you to select the No-Action Alternative, which is the only alternative besides the full Proposed Project Alternative presented in the DEIS.

Thank you for considering my comments.

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