

Subject: Formal Comment on Mission Ridge Ski & Board Resort Expansion Draft EIS (Volumes I–IV)
To: Mike Kaputa, Director, Chelan County Natural Resources Department
Date: 10/20/2025
From: Graham Stansbery, Malaga, WA

Thank you in advance for your time and consideration of my comment on the Draft Environmental Impact Statement (DEIS) for the proposed Mission Ridge Ski & Board Resort expansion. As an enthusiastic skier who values Mission Ridge's terrain, community, and contribution to our region's outdoor culture, I understand the importance of recreation-based economic development. I also understand the cultural significance of the Mission Ridge area for the native p'squos people. Mission ridge is an extremely unique habitat that harbors the most diversity of endemic plant species in Washington State. Among many of its natural wonders, it harbors endangered white bark pine, old-growth western larch trees, is the calving ground for the Clockum elk herd and nesting ground for golden eagles, and has year-round deer, elk, and cougars.

I am deeply concerned that the DEIS fails to meet the analytical and legal standards required by Washington's State Environmental Policy Act (SEPA, RCW 43.21C), the Growth Management Act (RCW 36.70A), and Chelan County's own development code. The DEIS underestimates the irreversible environmental and community consequences of this large-scale, real-estate-driven expansion and provides insufficient mitigation. They consistently dance around the reality that this is a real-estate development, trying to cast it as merely recreation expansion. Let me be clear, this is an urban style development at the headwaters of two basins, on top of a complex geologic structure, and in the middle of a unique ecosystem with a huge diversity of endangered and endemic plants and permanent and migratory animal species. I would like the county to choose the "No Action" option.

I could pick apart every aspect of this DEIS, but I know many others already have. Below I have chosen to address some specific deficiencies in only 5 sections (1.5, 4.4, 5.2, 5.3 5.5, 5.7, and 5.12) of the DEIS and request a full revision before any permits or approvals proceed. Ideally, Frankly, it is embarrassing to read some of this DEIS report. As a high school science teacher, I taught Advanced Placement Environmental Studies and have read my share of EIS's. This one is the most flimsy I have ever seen. Much of it reads more like a marketing campaign than the rigorous legal and scientific document it is supposed to be. Where is the research, the evidence and the acknowledgement of local codes and laws. That aside, I hope the details I provide below help guide you to requiring more comprehensive and honest research and reporting from the developer.

Section 1.5 — Purpose and Need

- Predetermined outcome and limited alternatives.
Section 1.5 defines the project's "need" almost entirely as expanding year-round resort capacity and lodging. SEPA requires that an EIS evaluate a reasonable range of alternatives (RCW 43.21C.030(2)(c)). The current framing pre-judges that the expansion must occur, rather than neutrally examining smaller or phased options such as ski-terrain-only improvements or lift modernization without new residential development.
- Failure to disclose irreversible commitments.
SEPA also mandates disclosure of "any irreversible and irretrievable commitments of resources" (RCW 43.21C.020(2)(c)). The DEIS omits quantification of permanently lost forest acreage, soil conversion, and road/parking footprints.

Requested revision: Reframe Section 1.5 to identify (a) recreation as the primary purpose, separate from real-estate elements; (b) explicit irreversible resource losses; and (c) a full "reduced-scale" alternative.

Section 4.4 — Land and Shoreline Use

Section 4.4 concludes the expansion is “consistent” with Chelan County’s Comprehensive Plan and zoning, but that conclusion is unsupported.

- Comprehensive Plan inconsistency.

Chelan County Comprehensive Plan Goal 3 calls for protecting “the long-term productivity of natural systems.” The DEIS treats this project as a simple extension of recreation use, but the proposed resort village, commercial space, and high-density lodging represent a land-use conversion from open-space recreation to quasi-urban development. That contradicts the Plan’s resource-land conservation goals under RCW 36.70A.020 (8).

- Zoning and Planned Resort limitations.

The property lies largely within the Recreation (Tourist) District and may require approval as a Planned Resort Development under CCC 11.92 and a Conditional Use Permit under CCC 11.88. The DEIS does not demonstrate how large-scale residential and commercial components comply with those standards—particularly the requirements to preserve surrounding natural character and maintain adequate public access.

- Inter-jurisdictional conflicts.

Adjacent lands are managed by the U.S. Forest Service (USFS) and Washington Department of Fish and Wildlife (WDFW). Both agencies have conservation mandates that limit permanent infrastructure and motorized intrusion. The DEIS asserts compatibility without citing the governing USFS Ski Area Special Use Permit or WDFW management objectives, nor does it assess cumulative land-use effects on those public holdings. I do not see how Chelan County can move forward with authorization of this development without consultation with these agencies.

- Shoreline omission.

Although no state-designated shorelines exist within the project, runoff and sedimentation ultimately drain into the Columbia River basin, making indirect shoreline effects relevant under the Shoreline Management Act (RCW 90.58). The DEIS should model and disclose those downstream consequences.

Requested revision: Re-evaluate Section 4.4 for (1) consistency with GMA and County goals protecting natural systems; (2) compliance with CCC 11.88 and 11.92; (3) integration of USFS/WDFW land-management constraints; and (4) basin-wide shoreline-related runoff impacts.

Section 5.2 and 5.3 — Groundwater, Wastewater, and Septic System Impacts

The DEIS’s treatment of groundwater, wastewater, and septic feasibility is incomplete and inadequate under SEPA (RCW 43.21C.030(2)(c)) and Chelan County Code Titles 11 and 15. It provides only brief narrative statements about “on-site wastewater disposal” and “standard mitigation measures,” but fails to supply any technical analysis of whether septic systems are physically, geologically, or environmentally feasible in the project area. This is a big one, in which I have more knowledge, so I will go a little more in depth.

- Unsuitable terrain and soil limitations.

According to NRCS mapping cited in Section 5.3, much of the project site consists of Entiat, Chelan, and Wenatchee soil series—thin, rocky, and highly permeable soils formed on steep mountain slopes. These soils exhibit low water-holding capacity and are often underlain by fractured granitic bedrock. Such conditions are unsuitable for conventional septic drainfields because effluent can migrate rapidly through fractures or downslope seeps without adequate treatment. Yet the DEIS assumes that “standard on-site systems” will suffice. There is no field verification of soil depths, percolation rates, or groundwater separation distances. Given the large scope of this project, this is very disturbing.

- Lack of hydrogeologic modeling.

The DEIS contains no groundwater model, no delineation of flow direction, and no mapping of seeps or shallow aquifers. Without this, the County and the public cannot evaluate whether wastewater effluent could enter ephemeral streams that drain toward the Wenatchee River or recharge the valley aquifer. SEPA requires that an EIS identify and evaluate probable significant adverse impacts—including those

to water quality. The absence of data renders the conclusion of “no significant impact” unsupported. I have been in that area, and springs run year round. It is a very porous substrate, with ground water near to the surface. We need guarantees from the developers.

- Risk of cumulative contamination and slope instability.

The cumulative effects of multiple septic systems—particularly at higher elevations with thin soils—include nitrate loading, bacterial contamination, and slope saturation leading to shallow landslides. Section 5.12 of the DEIS fails to carry these hydrologic and geotechnical effects forward into its cumulative-impact analysis, contrary to WAC 197-11-060(4)(e), which requires analysis of impacts “likely to occur in combination with other reasonably foreseeable actions.”

- Inconsistency with County and State standards.

Chelan County Code 15.70 (Forest Practices Standards) and Title 13 (Sewage Disposal) require demonstration that septic systems will not cause pollution or endanger water supplies. The DEIS provides no engineering designs, capacity calculations, or compliance demonstration with WAC 246-272A (On-site Sewage Systems). Moreover, the proposal contradicts the Chelan County Comprehensive Plan Water-Quality Goal, which commits the County to “prevent degradation of surface and groundwater quality through proper design and location of wastewater systems.”

- Lack of feasible mitigation.

The DEIS lists no mitigation beyond “BMPs” such as maintenance and inspection, which are not enforceable or sufficient in this terrain. It should evaluate centralized wastewater treatment alternatives (package plant or conveyance to a regional facility), identify effluent disposal locations, provide nutrient-load modeling, and commit to a monitoring plan with measurable thresholds.

Requested revision:

- Conduct a full hydrogeologic assessment including borings, seasonal groundwater monitoring, and nutrient transport modeling.
- Evaluate centralized or advanced treatment alternatives and identify a long-term wastewater management district or operator, with the financial assurance they can build and maintain such a system.
- Quantify cumulative nitrate and phosphorus loading to the valley aquifer and downstream surface waters.
- Provide enforceable mitigation measures and financial assurances to ensure wastewater systems are properly designed, operated, and decommissioned if they fail.

Without these analyses, the DEIS’s assertion that wastewater impacts will be “less than significant” is unsubstantiated. In a high-elevation environment with thin soils, steep slopes, and fractured bedrock, septic systems are not a practical or environmentally responsible solution. Approval of the project on this basis would expose Chelan County and the public to long-term contamination risks that cannot easily be remedied once development is in place.

Section 5.5 — Wildlife and Habitat

- Insufficient quantification.

The DEIS provides general descriptions of habitat types but no acre-by-acre accounting of forest removal, fragmentation, or corridor disruption. SEPA requires quantified disclosure of significant impacts.

- Forest-conversion compliance.

Under Chelan County Code 15.70, forest-practice conversions must demonstrate minimization of habitat loss and reforestation timing. The DEIS offers only generic promises of revegetation with no binding schedule, metrics, or bonding. It also, does not state how they will they be held accountable.

- Cumulative and interagency gaps.

The DEIS omits a cumulative-effects discussion incorporating WDFW’s 2021 findings that adjacent elk

habitat is already degraded and not suitable for year-round resort expansion. I appreciate they state this fact, but then ignore its value. I have seen elk in that area year-round. The upper basin, adjacent to this property, and I'm assuming on the property, is prime elk calving grounds.

Requested revision: Provide habitat-type acreage tables, enforceable mitigation with measurable criteria and bonding, and a CCC 15.70 compliance demonstration coordinated with WDFW and USFS.

Section 5.7 — Recreation and Non-Motorized Access

- Loss of existing public access.
The DEIS minimizes how new lifts, boundaries, and private infrastructure will curtail uphill travel, backcountry access, and non-motorized use. Current routes to Clara and Marion Lakes and the Stemilt Basin originate at the ski-area base; the expansion would effectively privatize those corridors.
- Inadequate mitigation.
Offering remote parking "about a mile away" is not a practical substitute for current trailhead access. SEPA requires that mitigation be reasonable and effective. Mission Ridge Resort already act like they can tell non-resort users where we can park, which goes against their SUP from the USFS.

Requested revision: Map all current non-motorized routes, quantify affected user numbers, and propose enforceable mitigation—dedicated public access corridors, year-round trail signage, and protected parking for non-resort users.

Section 5.12 — Cumulative Impacts

Section 5.12 provides only a brief narrative and fails to meet SEPA's requirement to evaluate cumulative and indirect effects (RCW 43.21C.030(2)(c); WAC 197-11-060(4)(e)).

- Temporal myopia.
The DEIS treats the project as a single event and does not analyze how infrastructure, grading, and induced development will permanently alter hydrology, vegetation, and wildlife corridors. Once roads and lifts are built, reclamation is effectively impossible; this constitutes an irreversible commitment of land resources under RCW 43.21C.020(2)(c).
- Ecosystem and watershed impacts.
There is no cumulative watershed model for erosion, sediment delivery, or downstream effects on the Squilchuck and Stemilt basins' water quality and flood dynamics. Slope disturbance combined with climate-driven precipitation extremes could significantly increase runoff and sediment loads.
- Socio-economic and land-use feedbacks.
The DEIS omits induced-growth analysis—how expanded lodging and year-round amenities would stimulate secondary housing and traffic on Squilchuck Road. SEPA and the GMA require accounting for these foreseeable consequences.

Requested revision: Prepare a full cumulative-effects chapter incorporating hydrologic modeling, habitat fragmentation mapping, and induced-growth projections. Evaluate long-term ecosystem and community productivity, consistent with the GMA's sustainability goals (RCW 36.70A.020 (10)).

Overall Enforcement, Monitoring & Phased Implementation Requests

1. Enforceable conditions. Convert all mitigation into binding permit conditions with measurable metrics, monitoring schedules, responsible parties, and financial assurances (bonds or escrow). SEPA and CCC 11.88 authorize such conditioning.
2. Monitoring transparency. Require public annual reports on mitigation performance, habitat restoration, and recreation-access commitments.
3. Phased approvals and capacity caps. If any portion is approved, require a phased schedule with performance gates—no second-phase construction until first-phase mitigation meets defined success criteria. Additionally, no permanent solution should be assumed to come at a later phase (i.e. build a

waste water treatment plant during phase 5, while building out large-scale septic systems. There is no guarantee that the developer will make it to the final phase of the project.).

4. Hard population and infrastructure caps. Establish maximum visitor and accommodation capacities consistent with USFS Ski Area Term Special Use Permit limits to avoid exceeding environmental carrying capacity.

I am grateful for Mission Ridge and what it brings to our community. Thoughtful, limited improvements can strengthen both recreation and stewardship. However, the DEIS as drafted does not satisfy SEPA's mandate for a thorough, forward-looking environmental analysis or Chelan County's own codes. Its treatment of land-use consistency, wastewater treatment, wildlife, public access, and cumulative impacts is insufficient, and its mitigation measures are unenforceable.

I respectfully request that Chelan County require a revised DEIS that:

- Expands and corrects Sections 1.5, 4.4, 5.2, 5.3, 5.5, 5.7, and 5.12;
- Provides quantitative analyses and enforceable mitigation;
- Demonstrates consistency with RCW 43.21C, RCW 36.70A, CCC 11.88, 11.92, 15.70, and applicable USFS permit limits; and
- Prioritizes protection of the mountain's long-term ecological and recreational productivity over short-term development gains.

Thank you for considering these comments and for your continued stewardship of Wenatchee's sacred guardian, Mission Ridge.

Sincerely,

Graham Stansbery
Malaga, WA
graham.stansbery@gmail.com