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October 19th, 2025

Mike Kaputa
Chelan County Natural Resources Department
411 Washington St., Suite 201
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Dear Mr. Kaputa,

Thank you for this opportunity to comment on the Mission Ridge Expansion Master Planned Resort Draft EIS.

I lived in Forest Ridge, just below the proposed project area, for the first 26 years of my life. I've spent many hours and have covered many miles in the Squilchuck/Stemilt Basins trail running, skiing, hiking, fishing, and observing flora and fauna. I also grew up skiing at Mission Ridge, taking my first lesson at the ski school when I was 5 years old, and I had a seasons pass at the Ridge all through high school. Because of my close connection to the area, I have been following the status of this proposed project since it was first announced in 2018. I also submitted a comment to Chelan County in 2020 supporting a Determination of Significance for this project. I want to thank Chelan County for issuing a Determination of Significance, which required the completion of the DEIS that I am commenting on today. Considering that the majority of comments, substance of the comments, and the immense size of the proposed project, there was no other reasonable choice than to issue a Determination of Significance. Thank you for having listened to those public comments, and having followed the corresponding guidelines when making that decision. I ask that Chelan County continue to adhere to these principals when making decisions in regards to the DEIS and issuance of the FEIS.

While reading through the entire DEIS, I came across many inaccuracies, questionable methodologies, persuasive language, and incorrect conclusions. In this letter I will be highlighting the issues that are most glaring, most important to me personally, and most impactful to the DEIS. I have organized my comments based on what issues they pertain to, and in rough chronological order of where these issues are found in the DEIS. Due to the nature of the DEIS, similar statements and findings are repeated throughout the DEIS. For most of my comments I provide a page number in the DEIS, so that what my comment pertains to can be easily referenced. However, due to the

immensity of the DEIS, there are multiple locations where a statement or finding would need to be revised. When I comment on a finding or statement in the DEIS, my comment applies to wherever this statement or finding is found in the DEIS.

Fact Sheet and Executive Summary

Subjective and biased components of the Fact Sheet and Executive Summary must be edited or removed.

The DEIS states, *“Current limitations impeding resort operations include insufficient on-site parking facilities to meet peak demand; undersized and crowded beginner skier terrain; lack of recreation options for non-skiers; and lack of on-site overnight accommodations.”* (FS-1) These “limitations” are also listed on ES-8. These statements are highly subjective and either need to be removed, edited to maintain objectivity, or edited to clarify these “limitations” are according to the applicant. The fact that there is “lack of recreation options” and “lack of on-site overnight accommodations” does not impede current resort operations. Wenatchee is only 12 miles away and has many lodging options and restaurants. In regards to recreation for non-skiers, there is snowshoeing available on nearby trails and sledding available just down the hill at Squilchuck State Park. There should be no opinions, subjectiveness, or talking points from the Applicant included in the DEIS.

On FS-1 and the sidebar on ES-1 there is a list of items that the proposed project calls for construction and operation of. On 2-4 these items are explained more in depth, and are found in a similar order as the lists above. I find it puzzling that some of the least impactful and smallest parts of the project are at the front of the list. Snow tubing is the 2nd bullet point, but 621 condos/townhomes/duplexes is the 6th? The fact sheet, in particular, will probably be the only part of the DEIS that many people will read (likely skimmed), and it's a disservice to the reader to not list the most impactful parts of the project first. The first bullet points should include the amount of residential development, commercial development, supporting infrastructure etc., while the last bullet points should be items like snow tubing and nordic ski area development. The purpose of this DEIS is to examine the potential environmental impacts of the proposed project, therefore the parts of the project that will be responsible for most of these impacts should be listed first. At the least these items should be listed alphabetically, but the current order seems to favor the Applicant's attempts to highlight popular aspects of the proposal, while hiding the more controversial aspects. In addition, the actual acreage of new skiing terrain should be listed, instead of the generalized “alpine ski area expansion”.

Major findings of the DEIS should be added to the Fact Sheet

The Fact Sheet should also list the elements that the DEIS found will have probable significant adverse impacts on. Something similar to what is found on 4-1 would be appropriate. For people who don't read further into the DEIS, they should be able to see these most important findings on the Fact Sheet.

Fire

Secondary access is practical, and should be required

The DEIS states that, *"EcoSign (2022) and AEGIS (2023) also determined that secondary access was not practical, due mostly to the volume of excess cut material that would need to be hauled off-site and many of the underlying properties not being owned by the Applicant."*(4-36) I would like to highlight that the proposed access road to the new village would also require a large amount of excess cut material be hauled away from the site, and that the proposed access road also crosses property (USFS) that is not owned by the Applicant. Secondary access (particularly route option 1) is no more impractical for the Applicant to develop than the village access road they are already proposing.

AEGIS also states that route option 1 would "not achieve code compliance". This is a moot point, as obviously it does not achieve code compliance as it sits, as it has not been properly developed. The current "temporary" road to access the Applicant's private parcel from the Mission Ridge parking lot is also not code compliant at this time, so why is that route being accepted as practical? If the proposed project and proposed access road is deemed practical by the Applicant, the secondary access route option 1 should be considered equally practical, and be required in accordance with CCC and International Fire Code.

Land and Shoreline Use

The DEIS must state that the proposed project is inconsistent with an MPR overlay

The DEIS alludes to, and cherry picks evidence for the proposed project being in compliance with an MPR overlay (despite the DEIS stating it's not intended to represent consistency with the relevant "local plans and regulations"(4-74)) There are certain aspects of a project that are disqualifiers to said project being eligible for an MPR overlay. Listed below are two concrete examples of why the proposed project does not qualify as an MPR.

- CCC allows, “*the development of master planned resorts that complement the natural and cultural attractiveness of the area without significant adverse effects on natural and environmental features...*”. The DEIS has an entire chapter highlighting four areas where there will be “probable significant impacts” that cannot be mitigated. In particular, in regards to “*natural and environmental features*” the Earth section in the DEIS states, “*The analysis found the Proposed Project would have significant and unavoidable impacts related to geology and soils because the Project Area overlays geologic conditions with long-term landslide risk, and landslides have occurred in recent history.*”(4-2) **These findings alone are in direct conflict with Chelan County Code’s requirements of an MPR overlay.**
- CCC requires that, “[t]he tract or tracts of land included in a proposed master planned resort must be in one ownership or control or the subject of a joint application by the owners of all the property included.” The proposed project occurs on land owned by the Applicant, USFS, and WDFW, yet only Larry Scrivanich is listed as an applicant. **The proposed project does not qualify for an MPR overlay due to this incongruence alone.**

Section 25 (owned by WDFW) must be excluded from the proposed project

As noted in the DEIS, WDFW stated that a ski area expansion is not an appropriate use of WDFW lands: “*...an expanded, year-round ski resort is not an allowable use of the land under the U.S. Fish and Wildlife Service (USFWS) contract that funded WDFW’s purchase of the property.*” The WDFW property provides recreation for naturalists, hunters, hikers, backcountry skiers, and habitat for many species of plants and animals. The DEIS discusses a land swap between WDFW and Washington State DNR for Section 25, yet the DEIS also states, “*The land swap is not part of the current Proposed Project...*”. Because of this, Section 25 must be excluded from the proposed project, as there is no current pathway for an expanded ski area to be an appropriate use for this parcel.

Plants and Animals

To be frank, I was very disappointed in the quality and accuracy of the Plants and Animals section in the DEIS. I found myself wondering if the individuals who wrote this section had spent any amount of time on the ground in the project area. Many of the species that the DEIS lists as having “low” or “moderate” probability of occurrence in the project area, have ample evidence to support either their presence or a high probability of occurrence. There are also several areas where species are easily dismissed as unlikely to occur, based on habitat preferences that are incorrect.

The section below provides evidence for the presence of several species that are present in the project area, and whose presence is dismissed by the DEIS. I also

highlight areas where obtuse methodologies were used in determining the impacts on these species.

Western Toad

Incorrect DEIS findings:

“Suitable habitat for western toad in the study area primarily occurs in riparian areas including those located in the Chelan PUD Utility Corridor. Because those areas will be protected by buffers during construction, potential impacts on western toad habitat are expected to be minimal.” (5-47)

Facts:

Western Toads utilize many different habitats when not breeding. According to the Washington State Department of Natural Resources (https://file.dnr.wa.gov/publications/em_fs13_011.pdf), “...researchers have observed females as far as 1.6 miles from breeding sites...”, “observations of some toads reveal they hibernate in terrestrial locations...”, and “When not breeding, this species lives in terrestrial habitats including grasslands, scrublands, woodlands, and forests, as well as mountain meadows...”.

Because of Western Toads extensive use of terrestrial habitats, impacts on these habitats by the proposed project must also be considered when determining potential impacts on this species. In addition, the DEIS incorrectly assumes that riparian habitats (breeding habitats for Western Toad) will be “protected by buffers”. In reality the Applicant may completely fill both Wetlands 1 and 2 (5-27). This would most certainly impact Western Toad’s in the project area, yet there is no analysis of these impacts in the DEIS.

The DEIS also fails to analyze impacts on Western Toads from the new access/village roads in the project area. Western Toads will undertake migrations over 1 mile in length from terrestrial non-breeding habitats to riparian breeding habitats. (<https://fieldguide.mt.gov/speciesDetail.aspx?elcode=aaabb01030>). Because of this, there is a high potential for mortality from vehicle strikes while undertaking these migrations. This could have large negative impacts on the local Western Toad population, which is already under stress from climate change, and is a candidate for listing in Washington State (WDFW). All of these impacts must be analyzed in the DEIS.

Northern(American) Goshawk

Incorrect DEIS findings:

The DEIS incorrectly refers to *Astur atricapillus* as “Northern Goshawk”. “Northern Goshawk” was split into two separate species in 2023 by the American Ornithological Society. The species occurring in the project area has the common name of American Goshawk. The DEIS should update the name to reflect this recent split.

“Species with moderate potential of occurrence include... Northern Goshawk. Because of the moderate-to-low probability of occurrence in the study area, there would be no effect to these species.” (5-55)

Facts:

In reality there is 100% probability that Northern Goshawk occur in the project area, as the Friends of Mission Ridge Trail Camera Survey captured an image of a Northern Goshawk in the project area, along with locating a nearby probable nesting site.

In addition, there are multiple observations of Northern Goshawk in the Mission Ridge environs on iNaturalist and eBird. Considering this evidence, there are mostly definitely Northern Goshawks utilizing the project area. A new study must be completed so that their use of this area (including a likely breeding population, which would designate the project area as PHS priority area), and the potential impacts from the proposed project on this species are fully understood.

Dusky/Sooty Grouse

Incorrect DEIS findings:

“Suitable habitat for dusky and sooty grouse in the study area includes both riparian an(d) wetland areas.”(5-48)

“Species with moderate potential of occurrence include...dusky grouse, sooty grouse...”(5-55)

Facts:

I have no idea why the DEIS states that Dusky Grouse habitat is primarily riparian in nature, as this is completely untrue. The Cornell Lab of Ornithology of Cornell University (one of the leading sources on birds in North America) states:

“During the breeding season, Dusky Grouse are usually found in or near mountain forests, especially those dominated by firs, ponderosa pine, quaking aspen, and Douglas-fir. Their foraging takes them out of the forests well into surrounding grasslands, shrubsteppe habitats of bitterbrush and sagebrush, and high-elevation subalpine and alpine habitats in summer. Females with young seek out more open environments rich in both seeds and insects. In some parts of the range, Dusky Grouse remain at high elevations year-round, but in other places, they move to lower elevations to winter among white fir, Douglas-fir, Engelmann spruce, western hemlock, mountain hemlock, and lodgepole pine.” (https://www.allaboutbirds.org/guide/Dusky_Grouse/lifehistory)

As you can see, Dusky Grouse habitat is in no way closely connected with riparian areas. Under the incorrect assumption of the DEIS, the findings for impacts to Dusky Grouse are entirely false. The incorrect methodology used by the DEIS only accounts for Dusky Grouse habitat in the project area that is riparian in nature. In reality, based

on the habitat descriptions above, I would argue most parts of the project area (outside of large basalt fields) provide excellent habitat for Dusky Grouse.

There is ample evidence to support the presence of Dusky Grouse in the project area. The Friends of Mission Ridge Trail Camera Survey captured images of Dusky Grouse in the project area, and there is also evidence on eBird/iNaturalist that shows they are present in nearby areas with similar habitat.

During a quick foray of the project area in October 2025, I observed two Dusky Grouse, an image of one of them is included below. The regular concentrations (and near certain likelihood of breeding populations) of Dusky Grouse in the project area qualify it as a PHS priority area.



Golden Eagle

Incorrect DEIS findings:

“Assessment focus: Potential Species include, golden eagle...Findings: Because of the low probability of occurrence in the study area, there would be no effect to these species.” (5-49)

Even the DEIS contradicts itself on page 5-56 under Migratory Birds stating, “Only a few species are likely to occur in the Project Area (including golden eagle...”

Facts:

There is an incredible amount of evidence that demonstrates the statement on page 5-49 is completely false, and that there is in fact a healthy population of Golden Eagles that utilize the project area.

The Friends of Mission Ridge Trail Camera Survey captured multiple images and video of Golden Eagles in the project area. In addition, the Mission Ridge eBird hotspot (eBird is listed as a “Resource” on WDFW webpage) shows 6 separate observations of Golden Eagle, and there are several additional observations within a few miles of the study area. Personally, I have observed Golden Eagles at Mission Peak and at Lake Marion. Although these two locations are outside of the project area, they are extremely close by with very similar habitats. Because of the many observations in/ near the project area (including during the breeding season), it’s almost certain that golden eagle’s are foraging and breeding in the project area, which would categorize the project area as PHS priority area.

Pileated Woodpecker

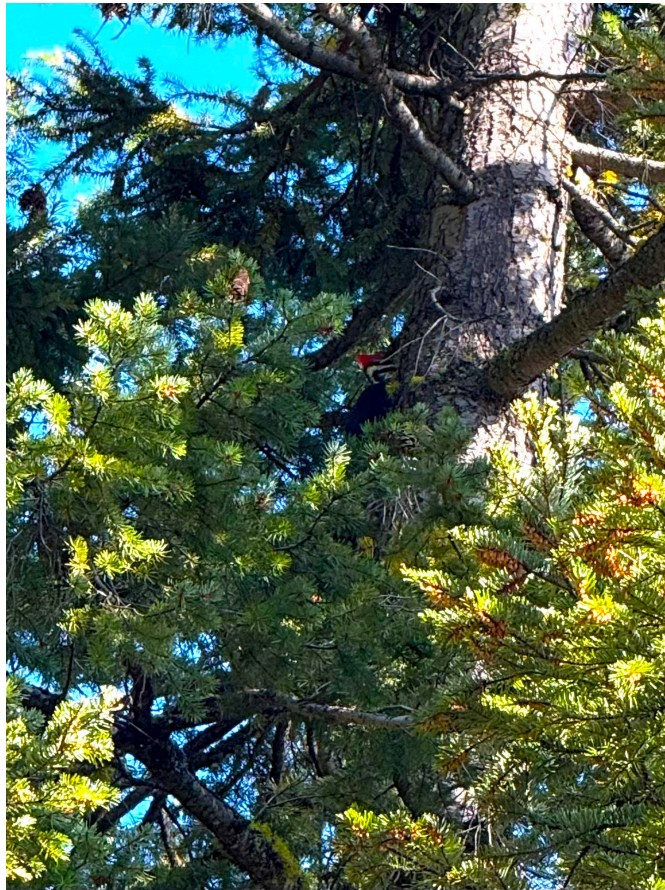
Incorrect DEIS findings:

“Species with low potential of occurrence include...pileated woodpecker... Findings: Because of the moderate-to-low probability of occurrence in the study area, there would be no effect to these species.”(5-55)

Facts:

Pileated Woodpecker occurs in the project area. During October 2025 I observed a pair of Pileated Woodpeckers foraging in the project area (photo below, excuse the grainy photo). The Friends of Mission Ridge Trail Camera Survey crew also observed Pileated Woodpeckers in the project area. In addition, there are several observations of this species in the Mission Ridge area on eBird.

The WDFW webpage for Pileated Woodpecker states that, *“The availability of large snags (standing dead trees) and large decaying live trees used for nesting and roosting by pileated woodpeckers has declined in many areas as a result of forest conversion (such as the removal of forest for urban development) and timber management practices.”*(<https://wdfw.wa.gov/species-habitats/species/dryocopus-pileatus#desc-range>). This DEIS specifically states, that not only will the snags that these woodpeckers rely on be removed, but that they will be specifically targeted. *“Where glading is applied, mature trees would be cut, prioritizing removal of diseased and damaged trees...”*(2-12), *“As part of construction, the Applicant would consult arborists to ensure retained vegetation is healthy.”*(5-44), are a few examples in the DEIS where it alludes to the fact that snags and “damaged” trees will be removed, which is the very habitat that is important to Pileated Woodpeckers and many other species. Interestingly, other sections of the DEIS state that the Applicant will attempt to retain snags “whenever possible” (see Table 2.4 for an example). So will “damaged” trees be targeted, or will snags be retained, which is it? And how will these impacts affect the Pileated Woodpeckers that do live in the project area? The DEIS must answer these questions.



Pika

Incorrect DEIS findings:

“...and the lack of impacts expected on wildlife species associated with talus, overall impacts are expected to be minor.”(5-49)

Facts:

Even though the DEIS acknowledges that Pika inhabit the project area (5-37), and there is ample evidence of their presence in the project area (Friends of Mission Ridge Trail Camera Survey), Pika are not acknowledged anywhere in the DEIS besides the quote above. Considering that talus habitats will be impacted from construction (see page 4-10), there must be an analysis of the impacts on Pika from this project. Impacts to Pika must especially be taken into consideration due to them being classified as a Species of Greatest Conservation Need, and having a high vulnerability to climate change (WDFW Pika webpage).

Elk

Incorrect DEIS findings:

“Although elk habitat quality would change in the study area, those changes would be limited”(5-47)

“elk are highly mobile and capable of finding alternative routes between summer and winter ranges.”(5-47)

Facts:

The DEIS drastically understates the value of, and elk utilization of habitat in the project area. One only needs to review the Friends of Mission Ridge Trail Camera Survey (or spend any actual time in the project area, not just making assumptions based on antiquated models) to see that the project area provides calving habitat and is a highly utilized migration corridor.

The map (Figure 5.4.3) used by the DEIS to evaluate quality of elk habitat, uses bad methodology and is not at all representative of the real situation on the ground. For one, it does not take into account disturbance from roads, trails, buildings, or other human presence. Some areas on the map show high habitat potential for elk, yet they are right next to Mission Ridge Road, Forest Ridge subdivision, and Squilchuck State Park. All of these areas have a high level of human presence and are areas generally avoided by elk. In reality elk are pushed into more difficult to access areas (like the project area), and utilize these habitats instead. A few studies that support this: <https://www.rmef.org/media/study-elk-tend-to-steer-clear-of-recreational-trails/> , <https://wdfw.wa.gov/sites/default/files/publications/01491/wdfw01491.pdf> . Interestingly, the WDFW publication states specifically, *“these authors found that human disturbance more strongly influenced elk behavior than did habitat or natural predators.”*(page 5). The map also does not take into account the Wheeler Ridge orchard development near the project area. The map shows high quality elk habitat in this area, yet it is now fenced in orchard, service roads, and clear cuts. Elk utilization of the project area is now likely even higher than it was several years ago, due to elk having less available habitat in the area. I’m sure there are even more issues with Figure 5.4.3, but just the examples above necessitate a new study that more accurately shows elk utilization of the project area.

The DEIS finding that elk habitat quality changes would be “limited” makes no sense at all. The project area currently sees only a small amount of human use and is (mostly) road-less and sees only limited use by motorized vehicles. The project would add thousands of people year round to this area, add miles of roads, hundreds of homes, condos, townhomes, and 110,000 sq ft of commercial space. Those changes are very drastic, not “limited”.

The DEIS stating that elk are highly mobile and can find a different migration route, is absurd. WDFW considers migration routes and calving grounds PHS priority areas,

irrespective of if elk can find alternate routes. This argument the DEIS uses is not sound at all, and could be used to dismiss the impacts on any large mammal, no matter how great those impacts may be.

The DEIS needs to fully acknowledge the utilization of the project area by elk, the presence of PHS priority areas pertaining to elk, and then, and only then, analyze and study the real impacts this project would have on elk.

White-headed Woodpecker

Incorrect DEIS findings:

“Species with low potential of occurrence include...white-headed woodpecker...”

Findings: Because of the moderate-to-low probability of occurrence in the study area, there would be no effect to these species.”(5-55)

Facts:

There are several records of White-headed Woodpecker on eBird near the project area. Some of these observations are very close to the project area (Forest Ridge, Squilchuck State Park) while others (Clara Lake, Mission Peak Trail) are farther away, but demonstrate that these woodpeckers can be found at the same elevations found in the project area. When I lived in Forest Ridge for 26 years (our home was less than a mile from the project area), we saw many White-headed Woodpeckers (image below is from April 2024). Even the DEIS states, “...a few species are likely to occur in the Project Area (including...White-headed Woodpecker...”(5-56).



It is likely that White-headed Woodpeckers also inhabit the project area, and an on the ground survey must be done to determine whether they are present. At the least, the

DEIS should be updated to state they have a high likelihood of being present in the project area, which contains some potential habitat. Habitat description from WDFW:

"This species uses conifer forests dominated by ponderosa pine, Douglas-fir, and occasionally other tree species such as aspen. Most areas are characterized by wide tree spacing, which produces an open canopy. The species was associated with large-diameter trees and snags in some studies, but recent work also indicates use (including nesting) of smaller trees and snags retained in clearcut harvest units." (<https://wdfw.wa.gov/species-habitats/species/dryobates-albolarvatus#desc-range>)

Flammulated Owl

Incorrect DEIS findings:

"Species with low potential of occurrence include...flammulated owl...Findings: Because of the moderate-to-low probability of occurrence in the study area, there would be no effect to these species."(5-55)

Facts:

Flammulated Owls almost certainly occur in the project area. A Northern Spotted Owl Survey for the Wheeler Ridge project detected a Flammulated Owl in June, 2018 (breeding season). The owl was detected at Survey Station 5, which based on the survey map is in the NE corner of Section 19, either within the Mission Ridge project area, or extremely close by (less than 1/4 mile). Because of this there is a high probability (not a low probability as the DEIS states) that Flammulated Owls occur in the project area. In addition, based on time of year that the above observation was taken, it's likely they are using the project area as a breeding area, which qualifies as a PHS priority area. A thorough Flammulated Owl survey must be completed in the project area to determine where breeding may be occurring, so that the full impact on this species from the proposed project can be understood.

Web address for study, see site visit on page 12: [https://www.co.chelan.wa.us/files/community-development/archives/Wheeler-Ridge/Preliminary Final MDNS/04_Northern Spotted Owl Surveys-WCSI Aug2018\[1\].pdf](https://www.co.chelan.wa.us/files/community-development/archives/Wheeler-Ridge/Preliminary%20Final%20MDNS/04_Northern%20Spotted%20Owl%20Surveys-WCSI%20Aug2018[1].pdf)

Western Bumble Bee (and other native bees)

Incorrect DEIS findings: No mention of Western Bumble Bee despite it being a PHS species, and likely to occur in the project area.

Facts:

There is a research grade observation of Western Bumble Bee on inaturalist.org, along the Lake Clara (Squilchuck) Trail, not far from the current Mission Ridge parking area (<https://www.inaturalist.org/observations/253009188>) . The WDFW Western Bumble

Bee webpage states that surveys have located only a handful of populations in Washington, “*primarily in remote subalpine and montane sites.*” The project area contains similar habitat as stated in the DEIS: “*Terrestrial habitats in the Project Area are similar to those within the existing Mission Ridge site with a mix of habitat types, including alpine meadows, subalpine forest...*” (page 5-37). Considering that there has been at least one confirmed observation of Western Bumble Bee near the project area, and that the project area contains appropriate habitat for this species, it is likely Western Bumble Bee occurs in the project area.

WDFW published a paper in April 2023 concerning status and ecology of Western Bumble Bee in Washington State, along with management recommendations (Martin, M. F., and J. M. Azerrad. 2023. Management recommendations for Washington's priority species: Western Bumble Bee. Washington Department of Fish and Wildlife, Olympia, Washington.) This paper shows two recent records of Western Bumble Bee near the project area, along with a map highlighting species distribution, with the project area being mapped as medium-high distribution (hard to tell precisely due to scale of map). Chelan County is also listed as a high priority for conservation of Western Bumble Bee.

The 2023 paper includes what are considered the “primary threats” to Western Bumble Bee in Washington State (page 6-8). The threats listed that will be most exacerbated by the proposed project are:

Pathogens: Although most pathogens are transferred to Wild Bumble Bees from commercial colonies, the paper notes, “Pathogens and parasites from other sources, such as RNA viruses from honeybee colonies (Singh et al. 2010), also threaten wild bumble bees (Colla et al. 2006, Otterstatter and Thomson 2008, Murray et al. 2013).” In order to properly mitigate for this potential, the Applicant must disallow keeping or introduction of non-native honeybees in the project area. This mitigation will help protect Western Bumble Bee from pathogens and parasites, although it will not entirely eliminate the risk due to the potential difficulty of enforcement.

Habitat Loss and Degradation: The proposed project would destroy and degrade Western Bumble Bee habitat. Considering that Western Bumble Bee are in dramatic decline, with populations becoming more and more isolated (resulting in genetic impacts, see page 7), the loss of habitat (foraging, nesting, overwintering) from the proposed project is unacceptable and not able to be mitigated. The 2023 paper highlights, “Conversion of natural habitat to impermeable surfaces, such as often the case with development, similarly decreases the availability of floral resources as well as areas suitable for nesting and overwintering. Additionally, landscaping in urban areas frequently includes large areas of turf grass that do not provide floral resources.” (page 7)

In addition, a recent survey (July 2025) (<https://agr.wa.gov/about-wsda/news-and-media-relations/news-releases?article=44313>) by the Washington State Department of Agriculture and Washington Bee Atlas, found 10 new or very rare species of native

bees in Chelan County. 8 of these species detected in Chelan County are new state records. WSDA highlights these findings in Central Washington stating, *“Many of these bees were detected in Central Washington, likely because most native bees have adapted to thrive in dry areas like the microclimates found East of the Cascade Mountains. Also, there are very few historic bee collection records in much of this predominantly rural area.”*

With the sightings of Western Bumble Bee near the project area, and the new discoveries of rare native bees in North Central Washington, a thorough survey of native bee populations in the project area must be completed. It's very likely that this project will harm Western Bumble Bee and other native bee species to some degree, but without a thorough survey it is impossible to speculate how severe these impacts will be, and if they could even be mitigated below a level of significance.

Migratory Birds

Incorrect DEIS findings:

“Findings: Only a few species are likely to occur in the Project Area (including golden eagle, calliope hummingbird, white-headed woodpecker, peregrine falcon) and operations are not likely impact these bird species at a population level.”(5-56)

Facts:

First, White-headed woodpeckers are considered a resident species and are not migratory (they only move short distances up/down slope), so I'm puzzled as to why they are listed in this section. Second, there are many migratory species of birds that either breed in the Mission Ridge area, or migrate through in the Spring/Fall. Here are 10 species just off the top of my head: Common Poorwill, Flammulated Owl, Yellow-rumped Warbler, Rufous Hummingbird, MacGillivray's Warbler, Chipping Sparrow, Turkey Vulture, Violet-green Swallow, Western Tanager, and Western Flycatcher. How can the DEIS say only a “few species” are likely to occur in the project area?

In addition the DEIS does not address two of the major issues affecting migratory birds, light pollution and window strikes. Many migratory birds (particularly song birds) migrate at night. The DEIS found that there will be significant additional glare and light pollution from the village, that cannot be fully mitigated, so why is there no analysis on how this will impact migratory birds? With the construction of 3+ story homes, condos etc, that I assume will have windows, why is there also no analysis on how window strikes will affect both migratory and resident birds? In the U.S. alone, over 1 billion birds are killed annually from collisions with buildings.

Considering that the DEIS found visual impacts on humans from the project are significant, the DEIS must also consider that these impacts extend to migratory birds (and other wildlife too). A thorough analysis of how light pollution and window strikes will impact migratory birds must be completed and added to the DEIS.

Aspen

Incorrect DEIS findings:

“A small (0.9-acre) aspen stand would be partially eliminated during construction of the main access road. Because that stand is less than 1 acre in size, it does not meet WDFW’s definition of a priority habitat.”(5-49)

Facts:

The aspen stand was mapped via drone and found to be roughly 1.7 acres in size, almost twice the size of the oddly convenient 0.9 acres stated by the DEIS (see Friends of Mission Ridge Trail Camera Survey). This discrepancy is quite large, and I would imagine the aspen stand is at least 1 acre in size, qualifying it as a priority habitat. The DEIS needs to have an independent, 3rd party measure this aspen grove, with evidence for the measurement provided in the DEIS. With this aspen stand likely being over 1 acre in size, it is considered a priority habitat and should not be allowed to be disturbed at any level.

There are more inaccuracies throughout the DEIS Plants and Animals section than I can even count. My comments above highlight only a small percentage of these blatant untruths. Considering how flawed both the DEIS and its appendices are in regards to Plants and Animals, there is no other reasonable option than for a new, in-depth, 3rd party study/survey of the flora and fauna of the project area to be completed. The study must be at minimum one year in length, since so many species utilize the project area on a seasonal basis. The current findings of the DEIS are supported by incorrect conclusions and bad methodologies, and cannot be trusted by the public or decision makers.

Anything less than an in-depth, and at minimum, 1 year study of plants and animals in the project area, would be both a blatant disregard for the truth, and neglect of the SEPA duties held by Chelan County.

Sources:

Friends of Mission Ridge Trail Camera Survey (study recently conducted in the project area, provides photo evidence of the presence of many species):

<https://drive.google.com/file/d/1rJs7cbZDdqPor5ijqVNSxAZGMOZ-8IBX/view>

iNaturalist (amateur and professional naturalists share their observations, many “research grade”, of flora and fauna):

<https://www.inaturalist.org/>

eBird (birders share their observations of avian fauna. Data is used for many studies):
<https://ebird.org/home>

Statement concerning reservoir providing aquatic habitat needs more context. Negative impacts on wildlife from proposed reservoir must be analyzed

On page 5-40, the DEIS states, “A new proposed reservoir within the the Project Area to be used for snowmaking could provide additional aquatic habitat, although it is also not likely to support fish due mainly to a lack of connection to fish-bearing waters.”

There is a limited amount of research concerning the ecological impacts of snowmaking reservoirs, and the quality of aquatic habitat they provide. There is however a recently published (Jan 2025) study titled “Ecological quality of snowmaking reservoirs in the Alps and management perspectives” in Aquatic Sciences Volume 87, Issue 1. The abstract summarizes that although these high elevation reservoirs may host a limited number of flora and fauna, they also “...systematically lacked aquatic vegetation...”, “...faunal diversity appeared to be limited...”, and revealed potential “ecological traps”. The abstract also stated, “...there are concerns regarding their capacity to support species due to observations of drowned mammals and stranded amphibians and dragonflies.”

There are many unknowns regarding habitat provided by snowmaking reservoirs, and the referenced study suggests these reservoirs may even be detrimental to some species due to physical entrapment as well as being an ecological trap (a phenomenon where animals settle for poorer quality and detrimental habitats). Because of this, the DEIS must also acknowledge the limitations of habitat provided by the man-made reservoir in comparison to natural aquatic habitat, as well as its potential negative impacts on fauna (physical entrapment of animals, ecological traps, etc.). Without this additional context, the reader is left with an incomplete picture.

Impacts from avalanche mitigation on plants/animals must be analyzed

There is no analysis of where explosives for avalanche mitigation may be used, and what impacts these may have on plants and animals. Use of explosives would undoubtedly kill pika, voles, mice, and other animals in the subnivean zone. There could also be impacts to plants, including the damaging and killing of species like the threatened Whitebark Pine. In addition, explosives used for avalanche mitigation contain harmful, and toxic substances (<https://pubs.usgs.gov/wri/wrir03-4007/>). How will these chemicals impact these sensitive alpine and sub-alpine habitats? These potential impacts must be studied, analyzed, and disclosed in the DEIS.

Transportation

DEIS provides no mitigation for Squilchuck/Mission Ridge Road falling below minimum level of service

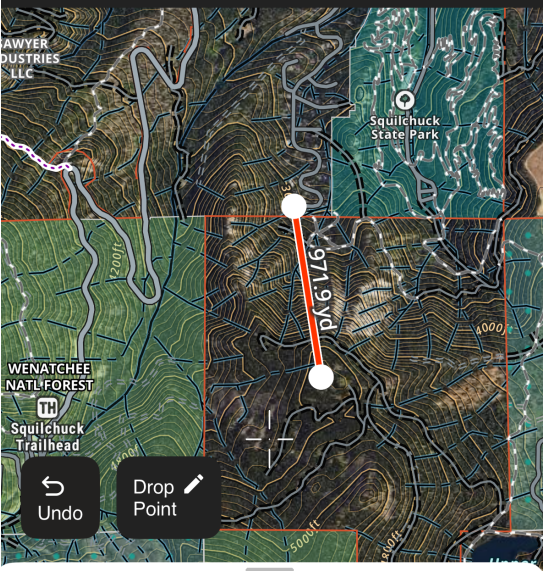
The traffic study provided in the DEIS states that daily trips on Squilchuck/Mission Ridge Road will reach 10,000 trips per day, yet there are no mitigation measures proposed. The current road is 28' in width, which would result in traffic conditions below the minimum level of service for the expected number of trips. There must be mitigation required that would maintain the level of service that is required by Chelan County. In addition, the DEIS should state that this mitigation would be paid for by the Applicant (as required for an MPR). If these mitigations are not included in the DEIS, Transportation must be listed in Chapter 4 as an element that will have significant impacts that cannot be mitigated.

Noise

Forest Ridge Distance from proposed village inaccurate

The DEIS incorrectly states that the Forest Ridge subdivision is more than 3 miles away from the proposed village, and subsequent noise impacts. As shown in the rough measurements below, the actual distance between the proposed resort and the closest Forest Ridge residences (sensitive receptors), is approximately 0.5 miles. Even residences at the North end of Forest Ridge are only a bit over a mile from the proposed village. Even if the elevational distance is also factored into the equation, all Forest Ridge residences are well under 2 miles from the proposed village, with many of the residences being under a mile away.

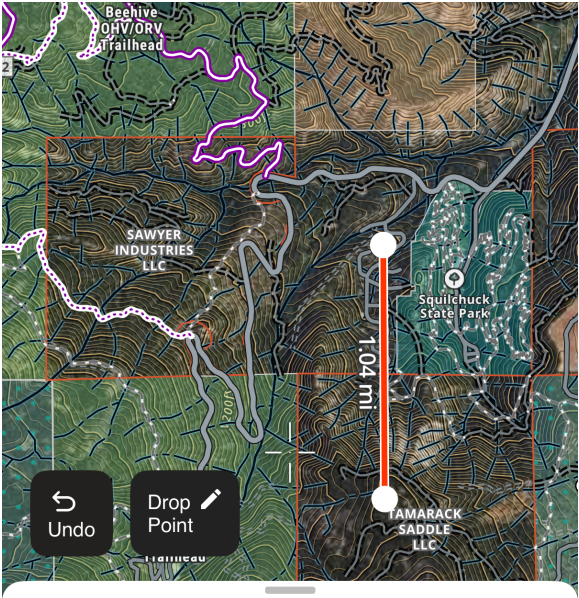
This is a major oversight, resulting in miscalculations and subsequent faulty findings. The analysis of the noise impacts on the Forest Ridge Neighborhood must be reanalyzed with the correct distance. The finding of the DEIS that states “the proposed project would have no significant and unavoidable impacts related to noise” must also subsequently be reconsidered utilizing the corrected noise calculations.



Line Name

Line 10/20/25 10:39

Distance	Elevation Gain	Elevation Loss
↔ 971.9 yd	↗ 1,229 ft	↘ 0 ft



Line Name

Line 10/20/25 10:39

Distance	Elevation Gain	Elevation Loss
↔ 1.04 mi	↗ 41 ft	↘ 1,591 ft

Analysis of noise impacts from operation must factor in use of explosives for avalanche mitigation

As a former 26 year long resident of Forest Ridge, I can tell you that the use of explosives for avalanche control at the existing resort can be loudly heard throughout the winter season. It's loud enough to wake residents from their sleep, disturb pets, and generally alter the otherwise peaceful and relatively quiet nature of the Forest Ridge subdivision. The DEIS does not provide any information on what additional avalanche control work must be done because of the proposed project and expanded skiing terrain. Noise impacts from avalanche mitigation are very important to understand, as they will impact the surrounding areas almost every winter season, for as long as the proposed development is in operation. Wherever explosives for avalanche control may be used in the project area, they must be disclosed so that the noise impacts can be calculated, and the impacts analyzed.

Miscellaneous

DEIS must consider Applicant compliance with proposed mitigations

Throughout the DEIS, there are numerous proposals of mitigation, yet the Applicant has shown that they do not follow regulations or instructions from regulatory agencies. One of the most glaring examples of this is the "temporary road" the Applicant constructed across USFS land in 2018. The purpose of this road was to explore the feasibility of the proposed expansion, and was approved by the USFS due to a Determination of Non-significance (DNS) and Categorical Exclusion.

The proposal documents, that were approved by the USFS, listed several parameters that were to be followed in the construction of the temporary road. The Applicant blatantly ignored many of these parameters, which you can see below.

- DNS states that the temporary road footprint shall have "approximate ground disturbance not exceeding 1-acre"(DNS page 1, 2C). Sidecast was found to extend up to 200' below the constructed road. It's estimated that 4 acres of ground was actually disturbed based on length of road (0.67 miles) with an average of 50' width of disturbance.



- DNS states that the temporary road will have “two temporary bridges placed on temporary supports” (DNS page 1, 2D). No bridges were found to have been built anywhere along the constructed road.



- DNS states that the temporary road footprint will have “soil erosion control and rehabilitation” (DNS page 2, 4). Silt fence was found only along the portion of the road visible from the existing ski resort. The majority of the road had no soil control measures in place.



- The DNS states that “Trees greater than 8 inches diameter at breast height (DBH) would not be removed” (DNS page 2). Multiple large trees greater than 8” DBH were found to have been removed during road construction.



The Applicant has shown that they cannot be trusted to act in good faith when it comes to following agreed upon mitigation measures. They could not even follow basic parameters for the construction of the “temporary road” to the proposed development. Yet the community and agency decision makers are expected to believe that the copious mitigation measures listed in the DEIS (or any permits) will be followed? Who will be responsible for oversight? How often will the site be audited? What penalties will be enforced on the Applicant if they are found to not be in compliance? What is the likelihood that mitigation and development regulations will be followed by the Applicant? These are all questions that are unanswered in the DEIS, but deserve to be thoroughly addressed. We can discuss mitigation measures all day long in project documents and permits, but if the mitigation measures and regulations are not followed, the environment suffers as if they were not even there in the first place.

Reading through my comment later, I’m sure it’s obvious that I do not support the proposed project. There are many reasons that I do not support it, but most can be broken down into two categories. The first is that the proposal is not consistent with the laws and regulations of our County. We all must follow these laws, and I don’t believe just because someone has a lot of money or power, they should get an exemption. The second category is that the impacts from this project will be so severe and damaging to the ecosystem and community, there is no level of mitigation that would make this proposal reasonable in my eyes. It is so easy to dismiss impacts by saying the elk can find a new home, the pika can move to another basalt field, or the aspen stand is just short of being big enough to matter. But we must take a step back, and see how all these impacts keep stacking one on top of another, and say that enough is enough.

Some projects are just not meant to be, and this is one of them. Several attempts have been made to develop Section 19 over the years, with this current proposal already 7 years into it’s attempt to be approved. The community, the land, and the soul of the Wenatchee Valley keep telling us that this is not the right path forward, and we would do well to listen.

Sincerely,

Austin Boese