

Oct. 15, 2025

Mike Kaputa, Director
Chelan County Department of Natural Resources
SEPA Responsible Official
missionridgeeis@outlook.com
411 Washington St. Suite 201
Wenatchee, WA, 98801

RE: Mission Ridge Master Planned Resort Expansion
Draft Environmental Impact Statement Concerns

Dear Mr. Kaputa,

Thank you for the opportunity to provide comments regarding the DEIS for the proposed development adjacent to Mission Ridge ski area. The DEIS is deficient regarding wildfire protection and lack of a second access road, omission of impacts on future skiing due to climate changes to precipitation and rain/snow mix, non-code compliant traffic impacts on roads, and wildlife and habitat detrimental impacts. The very small additions to the ski area runs do not justify the detrimental impact the development will have on our community and on the landscape and habitats. Elements in the plan do not meet Chelan County Code requirements. I urge you to support the No Action Alternative.

ISSUES AROUND WILDFIRE AND CLIMATE

The No Action Alternative is the only option due to extreme wildfire risk of the site, the inadequacy of the shelter-in-place plan, and the absence of a secondary access road. It will be unsafe for off-site fire personnel to respond, and the plan for a volunteer fire department is meager. Private and the backup WA state fire insurance is currently not available for secondary homes. Despite individual actions to adopt *Firewise* standards for buildings, the dense cluster of buildings automatically functions like a fire-prone dense forest. Wenatchee experienced this with 34 homes burned within 12 hours during the 2015 Sleepy Hollow fire. This month, the 2025 Labor Mountain wildfire jumped Highway 97 and is typical of future fires that will impact the forest surrounding the planned development. The planned “shelter in place” is not adequate or safe for residents nor fire-fighters.

The reason for not building a secondary access road offered by the developer is weak, arguing that fewer people will be at the resort during wildfire season, negating the need for a second access road, and allows “shelter in place” to substitute. EIS (pg. 4-25) states *In contrast, the developer believes 4,000 additional people greatly overstates the number of persons expected to be on site during the summer.* The development will be densely populated during fire season, as it will serve wealthy people seeking climate refuge of high elevation cooler geography as our summer temperatures increase and the wildfire season lengthens.

The EIS fails to reference best available science for the future climate forecasts. Long-term, WA will have decreased snowpack, and snow will shift to rain. The ski season will shorten, and will dwindle. This is established science, and the developer has easy access to this information; and likely understands that the resort will be utilized year-round as a climate refugia for wealthy people. The “shelter in place”

solution offered by the developer is weak, weakly arguing that fewer people will be at the resort during wildfire season, negating the need for a second access road. The EIS needs to reflect current consensus regarding our future climate here in the Wenatchee region: Climate Science Sources:

<https://www.climatehubs.usda.gov/hubs/northwest/topic/climate-change-impacts-northwest>

<https://www.climatehubs.usda.gov/hubs/northwest/topic/snow-water-equivalent-swe-its-importance-northwest#:~:text=In%20the%20graph%20above%2C%20we,of%20changes%20in%20groundwater%20recharge.>

The EIS Fire Protection Plan does not comply with the expert advice, the AEGIS Engineering, PLLC for the client and written in the Fire Protection Plan (April 18, 2018; revised Dec. 7, 2019): AEGIS Engineering describes this as a location is not suitable for urban development.

Page 5: *Fire Hazards: The isolated location of the Mission Ridge site present inherent challenges with regard to access for emergency responders in event of an emergency. The topography around the subject development area ranges from about 25%-100% slopes, contributing to the extreme conditions present at the site. A compounding factor is the extreme seasonal climatic conditions, which contribute to snow accumulation during the winter months and potential wildfires in the summer. Primary fire hazards contemplated involve structures and vehicles within the development, as well as wildland fires approaching from outside the site.*

AEGIS Engineering completed the International Wildland-urban Interface Code Fire Hazard Severity Worksheet (Page A-1 and A-2) and the project scored as “high hazard.” The Mission Ridge Expansion Project Subdivision Design scored at the highest levels (5) for having a one-way road in/out and for having dead-end road >200 feet, and at the highest level (3) for Accessibility with portions of road grade exceeding 5%. The Vegetation Score was at the maximum for fuel types (heavy) and Defensible space (<30% of site). The Topography Score was at the maximum for exceeding 30% slope. Overall, the project was ranked as High Hazard due to the lower scoring gained by the planned use of home construction plans. Note that the wildfires on land surrounding the development is not affected by “Firewise” home construction. The worksheet score clearly indicates that this is High Hazard location. If the development happens, homeowner insurance companies will likely choose not to offer coverage due to facts spelled out in this Fire Protection Plan document.

AEGIS Engineering’s Figure 7: Proposed Fuel Break to establish defensible space along the Mission Ridge Expansion (Page 14) is inadequate, as it does not take into consideration the site conditions described in paragraph 1 above: The location is on very steep topography in a narrow canyon which contributes to “*The extreme conditions present at the site,*” and the “*compounding factor is the extreme seasonal climatic conditions which contribute to... potential wildfires in summer.*” Recent wildfires such as the Carlton Complex, in this type of topography, create their own weather and wind extremes, and this fact has not been included in the analysis. The proposed fire break is not adequate in light of the topography and climatic conditions.

AEGIS Engineer’s Fire Protection strategy is dependent upon electricity to operate, and on a water supply that may not be available due to senior water rights existing in the basin. (page 9). The entire development will need over 4 million gallons of reservoir capacity. This reserve is assumed to be available, yet senior water rights in the basin may result in no water availability during wildfire season, as it corresponds with irrigated agriculture season in a basin where senior water rights are held by irrigating

orchardists. The developer's planned reservoir relies on electricity to run the pump, which will likely be turned off during a wildfire emergency.

ISSUES AROUND WATER AVAILABILITY: The EIS does not address the inadequacies of the current understanding of the Squilchuck Basin's Hydrology. The text prepared by WNR Group for the client support my claims. Below are excerpts from the Hydrology Memorandums (March 26, 2018 Hydrology Review Memorandum; and the Memorandum of Dec. 31, 2019).

There is a lack of certainty round the prediction of adequate groundwater availability contained in the WNR Group's text: *"The preliminary hydrogeologic investigation at the site has determined that the availability of future water needs may be present in deep bedrock fractures."* More troubling, WNR Group's stated that *"Proposed water use at the expansion project will primarily occur during winter and spring months when water is most available."* ...*The preliminary hydrogeologic investigation at the site has determined that the availability of future water needs may be present in deep bedrock fractures in the vicinity of the proposed Mission Ridge.*

The WNR Group acknowledges the likelihood of water rights disputes and allocations to senior rights holders, due to limited capacity within the basin, *"These deep bedrock fractures appear to be in hydraulic continuity with the surface waters near the ski area where current water right diversions are being utilized."* Bottom line: There isn't enough water to support the development. **This will directly negatively impact the amount of water available for storage in the fire protection reservoir.**

The WNR Group does his does not take into account that homeowners will be year-round users of their properties, with high residential water use year-round. Chelan County is experiencing growth and home purchases by Seattle area residents who move to our region for more affordable housing. Wenatchee and the Pacific Northwest are where climate refugees are moving to, and the current wave of retirees are the tip of the iceberg. (Source: Cliff Mass Weather Blog <https://cliffmass.blogspot.com/2014/07/will-pacific-northwest-be-climate.html>)

This incoming population will be the primary purchasers of residences in the development. WNR Group falsely assumes peak residence occupancy will only be during ski season, as it states, *"Availability of water is typically found during winter and spring seasons. If the proposed development occurs, the majority of use will occur during these seasons when water is available. Potable groundwater for in house use at the site will be in highest demand during the winter months, not during the low flow time period of the hydrologic cycle."*

WNR Group is clear in the lack of certainty due to incomplete knowledge of the how the ground water and surface-water flows in the Squilchuck Creek drainage interact, vary, and how groundwater recharge occurs. **At a minimum, Chelan County needs to hire a hydrologist to evaluate the WNR Group report and to incorporate climate-change forecasts, developed by the University of Washington and available through the Climate Impacts Group <https://cig.uw.edu/>**

The WNR Group does not address the forecasted climate change for east-side Cascades, shifting precipitation to rain (instead of snow), resulting in surface run-off highest in late fall through winter. WNR Group asserts that *The development of a snow pack on the ski slopes near the development is a non-*

consumptive use, and will also effectively help stream flows during the spring and summer months by allowing more recharge to the surface waters during the spring melt.

ISSUES AROUND WATER QUALITY

Basalt bedrock within the development footprint, is not capable of supporting the proposed dense array of septic systems. The nearby Whispering Springs development is now a landslide hazard zone, a cautionary tale for this proposed development, and should be referenced in the EIS. The EIS lacks a soil profile analysis. The feasibility of using septic required soils where water percolates. At this site, septic seepage will contaminate groundwater due to the nature of the fractured bedrock and close proximity to proposed wells.

ISSUES AROUND WILDLIFE and HABITAT

Best available science regarding WDFW priority wildlife and habitats has not been included in this EIS. As of 12/1/2025, the revised WDFW State Wildlife Action Plan for Washington will be published -a final draft is available at <https://wdfw.wa.gov/species-habitats/at-risk/swap> (SWAP). The report updates every 10 years, and the 2025 document includes database links to geographic locations. The SWAP includes 100 state sensitive plants which have been added to the WDFW Priority Habitats and Species (PHS) list. Two PSH plant species are within the development footprint: *Anemone patens* and *Pinus albicaulis*, and need additional research in the EIS. The Washington Administrative Code refers to PHS in sections dealing with Critical Area Ordinances, Shoreline Master Programs, and the Essential Facilities Siting Evaluation Council. The state supreme court has held that PHS is a valid source of best available science for the Growth Management Act.

The EIS does not apply best available science to the analysis of the expanded human impact of this development on ungulates and species of concern, like golden eagle, pika, and goshawk. The EIS does not use best available science to describe the negative impact of a year-round development on the resident wildlife. As stated in the Mission Ridge Trail Camera Survey, *Below are four clear examples of false or misleading claims contained in the 2025 DEIS: 1. "There are no wintering deer and elk in the project area" (Appendix F-9 - Section 2.1.1.3) 2. "The study area is on the margin of the American pika (Ochotona princeps) range and is likely too low in elevation for pika" (Appendix F-32 - Section 4.1.1.1) 3. "The study area has very little suitable habitat for northern goshawk nesting" (Appendix F-54, Section 4.2.1.3) 4. "The study area is either outside [Golden Eagle] range or lacks suitable habitat." (F-45, Section 4.1.1.3)*

The EIS falsely states that wildlife displaced by the development will move to other suitable habitat. There is none, and presence of extensive basalt talus slopes makes the ribbons of forest habitats more limited than the maps imply. The recent conversion of DNR forest to commercial orchard in the Stemilt Basin irreversibly reduced available habitat in the basin, and was not accounted for in the analysis.

The other takeaway from the control trail cameras on Section 23 is that the assertion made throughout the 2025 DEIS (Appendix F - Plants & Animals) "that suitable, equivalent habitats exist adjacent to the project area" appears to be false. The DEIS assumes that any displaced wildlife from Section 19 and the surrounding areas will be fine since they have other equally good places to go. If this were true, and other habitats were equal, they would already be a high-use, occupied habitat. The fact that Sections 24, 25 & 30 are currently highly used indicates either that they are already ideal habitats for the animals or that

they are subpar habitats, and that the wildlife have been pushed out of other ideal habitats. Recommending “the animals can just go somewhere else” ignores the actual impacts of destroying wildlife habitat and the harm that displacing animals has. This approach is reckless and does not comport with common sense or the massive body of evidence that suggests otherwise. SOURCE: Gnam, S. Rolfs, M. Mission Ridge Trail Camera Survey: 2024-2025 Wildlife Survey in the Stemilt-Squilchuck Basin, 2025

The fidelity of wildlife seasonal habitat uses and migration corridors and the negative impact of recreation, has been intensively researched in recent years and this research needs to be incorporated into a revised EIS. Year-round use of the development will result in extensive mountain biking and hiking, negatively impacting ungulate species, especially elk with young. Examples of best available science missing from the EIS is found in these publications:

Jordan, S.E., Ganz, T.R., Rutherford, T.K., Blocker, M.J., Domschke, C.T., Klasner, F.L., Masters, E.H., Morgan, T.A., Ratajczak, D.R., Teige, E.C., and Carter, S.K., 2025, Effects of nonmotorized recreation on ungulates in the western United States—A science synthesis to inform National Environmental Policy Act analyses: U.S. Geological Survey Scientific Investigations Report 2025–5014, 60 p., <https://doi.org/10.3133/sir2025014>.

Machowicz, A., Vanbianchi C, Windell, R. of Home Range Research in partnership with Conservation Northwest, 2022. Recreation and Wildlife in Washington: Considerations for Conservation A Report on Current Knowledge https://conservationnw.org/wp-content/uploads/2022/09/Recreation-and-wildlife-in-Washington-Considerations-for-conservation_FINALreduced.pdf

ISSUES AROUND THE MASTER PLANNED RESORT DESIGNATION:

Chelan County Code 11.89.010 Purpose states: The purpose of the master planned resorts overlay district is to enhance and diversify the recreational and economic opportunities in Chelan County through 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, cultural or historic resources.

The discussion above about climate, water availability, and wildlife shows that the proposed development will have significant adverse effects on natural or environmental features. The current EIS models and texts do not reflect what was learned by the Gnam and Rolfs 24 camera study. It is essential that the WDFW conduct field work to document PHS presence and habitat uses, so that inaccurate models used in the EIS can be corrected.

ISSUES AROUND SQUILCHUCK ROAD:

The EIS designates Squilchuck Road as a Rural Collector, but the plan does not follow Chelan County Code. The Code’s highest traffic category is 1,500-4,000 ADT, with a 32-foot paved width and does not meet the projected traffic of 10,000 vehicle trips/day, stated by the developer. Additionally, the Chelan County Comprehensive Plan Goal 1.9 is “...*deny approval of any development proposal that would cause a roadway segment to fall below the adopted minimum level of service...*”.

The EIS states that the developer plans to retain the 28-foot road, in violation of County Code.

<https://www.codepublishing.com/WA/ChelanCounty/html/Chelco15/Chelco1530.html#15.30.220>

(B) Design Standards for Rural County Roads. The design standards for rural county road classes are as follows in Table 15.30-4.

Table 15.30-4

Road Class – County Rural	ADT Range	Min. ROW Width Feet	Nom. Pave. Width Feet	Max Grade %
Rural Collector	1,500 – 4,000	60	32	12
Rural Local Access Class 1	400 – 1,500	50 – 60**	28	12
Rural Local Access Class 2	40 – 400	50 – 60**	24	12
Rural Local Access Class 3 Cul-de-Sac	40 – 120	50 – 60**	24	12
Rural Local Access Class HD*	50 – 1,500	50 – 60**	36 (1)(2)	12

I have restricted this letter to a handful of issues that all point to the No Action Alternative. Thank you for engaging in this important public process.

Sincerely,

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