

Mike Kaputa

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Chelan County Department of Natural Resources

411 Washington St. Suite 201

Wenatchee, WA, 98801

RE: Comments on Mission Ridge Expansion Master Planned Resort Draft  
EIS

My name is John Lehmkuhl. I am a 30-yr resident of the Squilchuck valley and am very familiar with the proposed site of the resort and the surrounding landscape. I have a Ph.D. in Forest Science from the University of Washington and had a career with the US Forest Service researching the impacts of fire and fire restoration strategies on wildlife and their forest habitats.

My comments relate to:

1. The accuracy and reliability of the fire risk analysis, and associated consequences for private property, public safety, and public resources,
2. Conclusions and actions about the Loss of Service in the Squilchuck Rd corridor, and
3. The stated premise that the proposed development of a small town with 886 privately-owned residential units fulfills the purpose and need of an MPR.

#### Fire Risk Analysis

**The fire risk analysis in the DEIS is woefully inadequate for describing and assessing the site's extremely high hazard from wildland fire, and the potential risk of catastrophic loss to structures and lives.**

I was the co-leader of the group that wrote the 2015 Amendment to the Squilchuck Valley Area Community Fire Protection Plan. That Plan is the single best available source of information on wildfire hazards and risk to human life and property in the Valley. Yet, most of the critical results of the fire risk modeling in the Protection Plan were not considered in the DEIS. Instead, in the DEIS a variety of data were patched together in a qualitative narrative that did not adequately portray the very high risk to life and property from wildfire in the project area.

The Protection Plan included a wildland fire behavior analysis done by the US Forest Service. The landscape-scale analysis was a state-of-the-art simulation modeling of

fire probabilities, fire intensity, and potential loss of structures based on the likely success of fire suppression efforts. The most important results from the Plan's fire modeling was that wildfire approaching the site would be near-impossible to control, and the net value loss of structures was predicted to be 80% or more. That potential outcome is not presented in the resort plan or DEIS.

One might argue, as the DEIS seemingly does, that the probabilities of high-intensity fire and successful suppression have changed in the 10 years since the Plan's fire analysis. Wildfires in the larger landscape may have reduced fuel loads, and fuel reduction/forest thinning projects may have reduced the likelihood of catastrophic impacts of future wildfire on the project area. Burned areas initially have reduced fuel loads, but fuels build up as dead trees begin to fall. Thinned forests can reduce fire intensity if logging fuels are treated with piling, mastication, or prescribed burning. The risk analysis in the DEIS is inadequate to accurately characterize these complexities of fuel loads and potential fire behavior. Given the very high property values and the safety concerns for the estimated 500-4000 people who might use the resort daily, a state-of-the-art wildfire risk and suppression analysis is essential.

**Given the potential for extreme fire behavior and low suppression probability, the resort's evacuation plan is inadequate, to say the least.** Building an escape road to the east or north of the resort was deemed not "practical" under the County rules and was rejected. I question whether the standard of practicality is adequate when the lives of so many people might be at risk?

The overland escape plans on unimproved roads described in the DEIS are not credible, given the extreme fire risk. I don't think a triathlete could navigate the extremely steep, rocky and forested terrain down to a safe area in a short time, not to mention children and the elderly. How many 4-wheelers would it take to ferry several hundreds of people? People's lives are at stake!

### Traffic

**The Traffic Impact Analysis (TIA, 2019) for Squilchuck Rd. vastly understates the impact on residents of Squilchuck Rd.** The projected increase in traffic volume is stated to be 39% (p. 19); but, the data in Table 7 indicate that traffic on Squilchuck Rd will increase from about 300 vehicles/hour (2017-2019 baseline) to 1200 vehicles/hr in 2040 at full buildout. That data-projected increase in traffic volume is about 400%, not the stated 39%. The DEIS does state that daily traffic volumes would increase by about 10,000 vehicle trips per day, but no baseline pre-project trip data are presented in the DEIS to assess the impact of that increase.

In addition, Loss of Service (LOS, Table 6) estimates at full buildout indicate that wait times to access Squilchuck road for residents living up to the Wenatchee Heights road will be over 3x longer, from 12 seconds to 39 seconds. The DEIS states that LOS in the Squilchuck corridor is projected to be LOS D, which is below the County standard of LOS C. Yet, that impact is ignored and only monitoring during construction is prescribed.

The inevitable conclusion is that Squilchuck valley residents, not the residents of Mission Ridge, Wenatchee, or the County, will bear the burden of increased traffic, traffic noise, commuting times, potential vehicle collisions, and associated loss of quality of life because of the resort urban development.

### Conclusion

- **The DEIS fails to adequately assess the fire risk and potential loss of structures and life in the event of a high-intensity wildfire.** Maybe a half billion dollars, or more, of private property (residences, hotels, service businesses, infrastructure) and hundreds to thousands of lives will be at stake, not to mention the very high cost of public resources (millions of dollars, manpower) to try and save those assets in the event of severe wildfire, which we well know happens in north central Washington.
- **The plan and DEIS fail to provide a safe and reliable plan for the safety of residents and visitors in the event of a wildfire.** The County standard of “practicality” in assessing the need for secondary access/escape routes fails to ensure the safety of possibly 4,000 people who are projected to be present at the resort.
- **Traffic in the Squilchuck corridor will increase about 400%, and loss of service (LOS) will degrade below the County standard with no plans for mitigation.** Residents of the Squilchuck Valley will bear the brunt of that oversight in reduced quality of life.
- **The proposed master planned resort is ultimately a real estate development and secondarily an enhancement of recreational opportunity.** Hence, it is doubtful that it fulfills the purpose and need of a master planned resort, as described in the County standards. It will crack the Urban Growth Boundary by creating a high-density satellite urban community in the fire-prone wildland-urban interface. The Squilchuck valley will become a 12-mile congested urban corridor linking the Wenatchee and Mission Ridge urban areas. The residents of

the Squilchuck valley will pay the price for this development, not the residents of the greater Wenatchee area. The main beneficiaries of the development will be wealthy out-of-town developers and buyers of second homes who have little stake in the overall quality of life in the greater Wenatchee area.

Given the plan for dense real estate development and the potential for catastrophic loss of life and property in the event of a severe wildfire, Mission Ridge and the County need to adequately assess in the EIS and be accountable in the Record of Decision for the potential for catastrophic losses of life and property and degradation of the quality of life outside the urban growth boundary.

John Lehmkuhl  
3742-4 Squilchuck Rd.  
Wenatchee 98001  
[jlehmkuhl@nwi.net](mailto:jlehmkuhl@nwi.net)  
509 669-7373