From: <u>Tammy Grater</u>

To: <u>missionridgeeis@outlook.com</u>

Subject: Fwd: Mission Ridge Master Planned Resort Expansion

Date: Tuesday, October 21, 2025 4:48:18 PM

Sent from my iPhone

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

- > Dear Mr. Kaputa,
- > I live a mile up from the Wenatchee Heights turn off from Squilchuck road and have to drive up and down Squilchuck road at least one round trip a day. Sometimes multiple times. Over the last five years or more traffic has felt more and more unsafe. There is more traffic, cars definitely driving over the speed limit and driving so close to the center line or over it. It's downright scary at times and you need to drive totally aware and anticipate what each car might do. If you drive up Squilchuck road at the time drivers are driving down from Mission Ridge, driving at least 45 to 60 miles per hour or more, you have to wait quite a while to make a left hand turn safely. I can only image how the increased ski traffic will affect this problem even more.
- > If there ever was a fire up in the Mission Ridge/Squilchuck area, the single lane traffic gridlock of all the cars trying to drive down the valley trying to escape could be horrendous. In conclusion, excess traffic hurts the people living in these areas. There is no upside.
- > I implore you to read the Friends of Mission Ridge website on this expansion so you are educated with both sides of the issue. Thank you for considering my comments to not allow this expansion to happen.

>

- > Tammy Grater
- > 4350 Canyon View Place
- > Wenatchee, WA 98801
- > gratertammy@gmail.com

>

> Sent from my iPhone

From: <u>Sarah Lindell</u>

To: <u>missionridgeeis@outlook.com</u>

Subject: Proposed Mission Ridge Development Project
Date: Tuesday, October 21, 2025 4:41:51 PM

Hello,

I am writing to express my opposition to the proposed mission ridge development project. As a Wenatchee resident, downtown business owner, longtime skier and mission ridge employee, I am against the development for several reasons.

First, there is no actual economic benefit to the Wenatchee community, ski resort jobs are low paying, seasonal and without benefits. Building a condo community does not generate long term jobs either. Only service industry work is left after the developer has sold off the condos. And developing and selling condos and the supporting amenities only benefits the developer. The cost of improving roads, providing fire fighting services and all the required public utilities is borne by the taxpaying local community. There is no logical reason our tax dollars should go to subsidize a developer in this way. There is also the issue of traffic. Squilchuck road is narrow, twisty, and regularly has rock falling into it. It also gets easily blocked with standing traffic when there is an accident or the roadway is too icy or snowy for safe travel. This road is already at its limit for the car load it can handle safely. What level of service will then be provided on this roadway when an additional 10,000 cars per day are added? The road will become impassable and unsafe. The non-local community who will have bought the overpriced condos will complain and the local taxpayer will then be required to build a new road-only benefitting the developer and now the new tourist population living in the condo community. How it will be possible to protect a community of people from fire risk with a single road in and out I don't know. How any insurance company will sell condo owners and businesses fire insurance I also don't know. Loopholes are not solutions, just excuses and paper. Paper burns really well.

Second, building a large development in the wenatchee mountains has a direct negative impact on the local environment. The Colockum elk herd is in that area and dense urban development is always a detriment to wildlife. Also, the project is proposed including t WDFW land WDFW has stated that "...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." So why then is this project even being considered?

Third, from a planning and policy perspective this project is untenable. The development violates the requirements of Master Planner Resorts including: The development is not primarily a destination resort, is not self-contained, does not consist of short-term visitor accommodations, does not consider affordable employee housing, and does not preserve the rural character or natural resource it uses.

Finally, as a person who grew up skiing and loves Mission Ridge, I don't want to see the mountain lose the character and sense of place that makes me come back to it year after year. The resort is profitable. Don't be greedy. Retain the character of Mission Ridge for future generations to learn to love the joy of adventure and winter sports.

Thank you for reading.

Sarah Lindell

From: <u>David Farmer</u>

To: <u>missionridgeeis@outlook.com</u>

Subject: Mission Ridge Master Planned Resort Expansion DEIS comment

Date: Tuesday, October 21, 2025 4:38:46 PM

I am writing in my capacity as a private citizen to voice opposition to the Mission Ridge Master Planned Resort Expansion DEIS proposed action and **support** for the **NO ACTION**

ALTERNATIVE; this expansion has direct negative impacts on thousands of residents across the County, including the this in city limits of Wenatchee. While I support and appreciate participating in recreational opportunities, current permanent residents should not be subject to significant disruption and negative impacts this commercial development with a small recreational component will bring. The Draft Environmental Impact Statement also does not properly analyze and mitigate all negative impacts and is lacking in specificity in many areas, especially regarding noise and transportation issues. My concerns are spelled out below.

Travel Corridor:

- 1. Squilchuck Road is a county-maintained road, access to the proposed expansion area is limited to one way in and one way out. This factor forces all traffic to be concentrated on one county road. This has major impacts on the entire county and City of Wenatchee:
 - a. There are major safety issues when evacuations are needed due to only one ingress and egress. One vehicle accident can trap hundreds if not thousands of visitors, residents and employees during an evacuation situation. Evacuations are likely to be needed due to being in an extreme danger are for wildland fire, which cannot be stopped by one traditional fire station that is proposed—with no details to staffing or equipment to be used—or who funds it.
 - b. Who will be responsible for the ongoing road maintenance of Squilchuck Road? There are current maintenance issues and needs for the road that have not been met but is adequate for lower levels of traffic currently using the road. Residents should not have to foot the bill for this through diverting tax revenue to support this development, and the development will never generate enough tax revenue to cover long term road maintenance or emergency services.
 - c. Noise: significant road noise will now occur, especially on lower Squilchuck Road. There is significant residential housing in this area—both Urban Growth and within the City Limits. While road noise is currently a nominal issue, many including me did not purchase housing with the knowledge that 10,000 additional vehicles could be travelling daily nearby. At that level, it is now a major highway, which greatly impacts property values of many permanent residents of the county and city. The EIS does not adequately address the significant noise disturbance this will create and the daily negative impacts for anyone living along the highway or in South Wenatchee. Decline in property values was not analyzed and no mitigation was suggested.

d. Traffic Congestion: Current traffic congestion and future concerns do not align with reality. Beyond a rural road becoming a higher danger heavy use road, traffic in Wenatchee urban area will become worse. I commute from Squilchuck to town daily and it can take 15 minutes to get from Lincoln Park area to Stevens Street alone. North bound traffic on Mission Street already backs up to Lincoln Park due to the undersized intersection at the Stevens St. Bridge. Alternative Routes to avoid the area route to school zones, again a traffic flow barrier. The traffic mitigations included potential modification of lighting timing at the Steven St. intersection; any modification will back up traffic on the bridge or south bound lanes—this is not a mitigation. Methow, a currently lower use residential road, was not analyzed effectively. This road would receive heavy traffic as an alternate route too. This road is a residential connector road, not a highway, and increased use will have substantial negative impacts on those who live on the road.

Mitigations that should be required if allowed to proceed:

- Require purchase of private land around Wenatchee Ave and Stevens St underpass/partial cloverleaf and build true 4-way cloverleaf to divert traffic easier on Wenatchee Ave, reducing congestion at the traffic lights. Extend Squilchuck Rd. to tie directly into Wenatchee Ave. This places most traffic into industrial road instead of residential neighborhoods. Require this to be fully funded by the developer.
- Restrict access to Methow Road by removing the intersection at Squilchuck.

Pedestrian and Cyclist Impacts:

Residents living on Kray Ike Court residents and Jeffrey Court have no access to sidewalks. I am personally impacted by this, being forced to walk on sections of Squilchuck Road with no sidewalks. I have had many close calls within inches of getting hit from vehicles failing to move an inch. There is no shoulder that can be walked on for most of it, minus a sidewalk that dead ends into a ditch north of Saddlehorn Lane. When biking, I have had vehicles brush my arm with their side mirrors. Many children live on Kray Ike Ct and as houses sell, families are moving in—active families, not sedentary occupants. Currently, we all run/walk as fast as possible to the sidewalk but still have close encounters. Having 10,000 vehicles using the road eliminates this ability and the ability to safely cycle on the highway, which is a well-known loop through Wenatchee Heights. Residents of Kray Ike Court will have ZERO safer viable options to leave their neighborhood except by vehicle, greatly diminishing their quality of life and impacting property values.

Residents on Methow St also lack access to sidewalks for many sections of the road, forcing pedestrians onto the roadway. Pedestrians are very common in this area, most neighborhoods adjacent to Methow St west of Crawford Ave are small loops, necessitating the use of Methow St for any exercise or casual recreational pedestrian activities. As traffic

increases, risk of collision with pedestrians exponentially increases. Additionally, further road deterioration will occur with no dedicated funding to repair or improve, also adding to greater safety concerns.

Sidewalks or other physical barriers separating vehicles from pedestrians need to be added to Methow Street from Saddlehorn Lane north to Crawford Ave and along Squilchuck Road to connect the sidewalk terminating north of Saddlehorn Ave to Kray Ike Ct and then to Terminal Ave sidewalks; at a minimum the Kray Ike Court and Jeffrey Court needs to be connected to Saddlehorn Ave.

Indirect costs and Emergency Services:

Permitting this development in a Wildland Urban Interface is contradictory to sustainable management and planning. Every citizen of the county or fire district will be subsidizing this through property taxes or diversion of other revenue to this to provide for fire and police protection. This is especially with wildland fire suppression, which can cost tens of millions of dollars for small fires even. Beyond direct suppressions costs coming from public pots of money, allowing building in this extreme fire risk landscape is negligent and could increase the homeowner's insurance costs of residing in more responsible inherently lower wildland fire risk areas. Insurance risk is a pooled risk; I should not have to subsidize that risk by being subject to increase commercial and residential insurance rates.

Police and Fire are inherently expensive. All services should be permanently fully funded by the development, not by citizens across the county. This a commercial profit seeking development, many if not all will be second homes—primary residents should not foot the bill through increased taxes or decreased services throughout the county that would otherwise inherently occur. The EIS does not address costs for these services, only that they will be needed.

Primitive Recreational Impacts and Quality of Life impacts from current baseline:

The Beehive Reservoir/Mission Ridge to Devils Gulch Trail system area on lands managed by the USFS and Clara and Lillian Lakes on WDFW managed lands are easy access to the current local Wenatchee area population with some out of area visitation. There is more than likely to be a large and unsustainable recreational pressure that will occur due to the amount of proposed additional of transient and permanent housing immediately adjacent. Public Lands along the entire Highway 2 Corridor from Wenatchee to Stevens Pass is now receiving heavy unsustainable recreational use; in the last two years even the Canyons in the Cashmere area have become so popular during spring bloom that local users cannot reasonably recreate there with any quality experience. The beehive area is the last area not over-used with a forested atmosphere for area residents to use. Losing this is a major quality of life issue and just one reason this project should not be allowed to proceed.

Due to inadequate analysis and mitigations in the DEIS and the significant impacts as outlined above, I do not support this proposed action and strongly encourage this project is not approved to proceed. The NO ACTION ALTERNATIVE should be selected as the best option for the county and the permanent residents.

Sincerely,

David Farmer

farmer d@hotmail.com

From: <u>Travis Hornby</u>

To: <u>missionridgeeis@outlook.com</u>

Subject: support letter

Date: Tuesday, October 21, 2025 4:37:37 PM

To Whom It May Concern,

As a Wenatchee City Council member, I, Travis Hornby, write in strong support of the Mission Ridge Expansion. This project is a vital investment in the long -erm economic health of our community, ensuring local jobs, tourism growth, and year-round recreation. Mission Ridge's local ownership safeguards our community values and preserves local control. Without this expansion, outside interests could dictate the future of this important community asset, leaving Wenatchee with limited influence over its direction. For these reasons, I urge approval of the expansion as essential to the future prosperity of our valley.

The economic benefits of the expansion are clear. An expanded Mission Ridge will attract more visitors, boosting tourism revenue for local businesses, including hotels, restaurants, and retail shops, while generating tax revenue that can be reinvested in our community. The project will also create new, stable jobs both directly at the resort and indirectly in supporting industries, strengthening our local workforce.

In addition, the expansion will improve accessibility and recreational opportunities for all ages and skill levels, making the mountain a more inclusive destination. Infrastructure upgrades—such as improved roads, utilities, and emergency services will benefit not only the resort but the broader community. This forward thinking approach supports long term growth and enhances the quality of life for residents and visitors alike.

Mission Ridge's careful planning and local commitment align with our community's values and vision. This expansion represents an opportunity to strengthen our economy, expand recreational offerings, and secure a prosperous future for Wenatchee. I wholeheartedly urge the swift approval of the Mission Ridge Ski and Board Resort Expansion.

Sincerely, **Travis Hornby** Wenatchee, WA From: <u>Heather Dappen</u>

To: missionridgeeis@outlook.com

Subject: Mission Ridge EIS Fire Concerns

Date: Tuesday, October 21, 2025 4:36:13 PM

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

Mission Ridge Master Planned Resort Expansion Draft Environmental Impact Statement Concerns

Dear Mike Kaputa,

Thank you for the opportunity to provide comments regarding the DEIS for the proposed development adjacent to Mission Ridge ski area. I have found that the number of omissions of impacts, inadequate mitigation, persuasive language, and incorrect assertions are too numerous to capture. It will be difficult for any one person to comment on all the problems with the document. This comment letter is to express my disapproval of the project through just a small sample of the many issues that are problematic in the DEIS.

Master Planned Resort Overlay: The developer is depending on this land use strategy that allows dense urban style development outside the urban growth boundary. Without the MPR, this level of development would violate the Urban Growth Act and could not be allowed. Despite depending on this planning tool, the development violates the requirements of MPRs including: The development is not primarily a destination resort, is not self-contained, does not consist of short-term visitor accommodations, does not consider affordable employee housing, and does not preserve the rural character or natural resource it uses.

Working for the US Forest Service, a specific comment I'd like to point out, falls under the fire section. I'm concerned about how many people the development plans to add up Squilchuck, without adequate ingress/egress. Even if they are able to build it up to code, fire risk is only increasing. How will we keep these people safe going into more and more drought seasons? The insurance companies will be asking the exact same questions.

Already, residents have struggled to secure homeowner's insurance up the Chumstick and Entiat. The insurance companies deem it too high risk to insure. I wonder what will happen to the Mission Ridge development, to be built in a fire-prone area. If people have to pay extraordinary amounts to get their homes insured up there, is it really worth bending the rules now when it will all just compound more issues later? Food for thought.

I expect Chelan County to stick to established codes and not bend the rules for the benefit of a developer. Since the development appears not possible without breaking County Codes, I urge you to select the No-Action Alternative which is the only alternative besides the full development build-out that is presented in the DEIS.

Thank you for considering my comments,

Heather Dappen Resource Assistant From: Kevin Kane
To: Mike Kaputa

Subject:Please Protect Mission Ridge Wildlife HabitatDate:Tuesday, October 21, 2025 4:33:25 PM

Dear Mike Kaputa, Chelan County NRD,

I am writing to urge you to select the No Action Alternative for the proposed Mission Ridge development. The DEIS fails to adequately address impacts to wildlife, habitat, and public safety, and does not meet Chelan County's standards for responsible growth.

The area surrounding Mission Ridge provides critical habitat for mule deer, elk, and wideranging carnivores such as black bears and cougars, as well as for species of greatest conservation need, including northern goshawks, golden eagles, whitebark pine, and American pika. These mountain and shrub-steppe transition zones are particularly sensitive to disturbance, serving as essential corridors for seasonal migration and climate adaptation. Fragmenting these connected habitats would cause long-term harm to wildlife movement, watershed health, and overall ecosystem resilience.

These foothills and forested slopes are part of a larger ecological network linking the Cascade crest to the Columbia Basin. Protecting their continuity supports not only iconic wildlife but also the long-term resilience of forests and watersheds, which face increasing drought, heat, and fire risks under a changing climate.

The proposal also depends on exceptions to Chelan County codes, enabling expanded human development in a fire-prone, high-elevation landscape. Increased human activity would elevate wildfire risk, strain emergency response capacity, and degrade sensitive habitats that wildlife depend on for survival. These risks are precisely why county planning standards exist: to safeguard public safety and ecological integrity alike.

Conservation and community are not opposing goals. Upholding existing land use protections honors both people and place by ensuring that wildlife, clean water, and natural character remain part of what makes this region special. Thoughtful planning today ensures that future generations can continue to hunt, hike, ski, and find connection in landscapes that remain wild and whole. Please select the No Action Alternative to protect the Mission Ridge landscape and the shared benefits it provides for wildlife and the community alike.

Regards, Kevin Kane 200 S Kent Pl East Wenatchee, WA 98802 From: <u>Leon Ganuelas</u>

To: Phil Rigdon; missionridgeeis@outlook.com

Cc: <u>Tia Beavert</u>

Subject: Re: YN Comments on Mission Ridge Expansion Master Planned Resort DEIS

Date: Tuesday, October 21, 2025 4:32:38 PM

It is fine with me lets move forward.

Leon.

From: Phil Rigdon

Sent: Tuesday, October 21, 2025 3:54:10 PM

To: missionridgeeis@outlook.com **Cc:** Tia Beavert; Leon Ganuelas

Subject: YN Comments on Mission Ridge Expansion Master Planned Resort DEIS

Please see Yakama Nation comments.

Philip Rigdon, Superintendent Yakama Nation Department of Natural Resources PO Box 151 Toppenish, WA 98948 509-865-5121 ext 4655 W 509-945-1798 C



From: Saxon Spillman

To: <u>missionridgeeis@outlook.com</u>

Subject: 2nd Copy, Corrected Draft for Comment Date: 2nd Copy, Cotober 21, 2025 4:23:13 PM

October 21, 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. I have found that the number of omissions of impacts, inadequate mitigation, persuasive language, and incorrect assertions are too numerous to capture. It will be difficult for any one person to comment on all the problems with the document. This comment letter is to express my disapproval of the project through just a small sample of the many issues that are problematic in the DEIS:

Traffic on Squilchuck and Mission Ridge Road: The project predicts 10,000 vehicle trips per day on the Mission Ridge Road, which is roughly double the traffic on both Stevens Pass and Blewitt Pass. The DEIS predicts that the development will snarl traffic to a condition below minimum Chelan County standards, yet the DEIS argues for no mitigation and no improvements to the Mission Ridge Road. 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...". Our community should not tolerate snarled traffic that financially benefits a developer but hurts the rest of us.

Secondary Access to the development: A second access road is required and would provide an alternate escape route if ever needed. However, the DEIS presents secondary access as an alternative. Secondary access is not an alternative; it is a code requirement. The DEIS recognizes that the second access would make a safer situation, stating in section 4.2.1.6 that: "Having more than one evacuation route provides redundancy and increased safety, particularly during unexpected or fast-moving events." Yet, the developer argues that providing a single "wider" 28-foot access road will make up for the danger of not having an emergency exit. This offering of a single "wider" road is persuasive and misleading. The current Mission Ridge Road is 28 feet wide and is not adequate for the proposed development's traffic. The proposed "wider" road is the same width as the existing road and won't even meet minimum County standards.

WDFW Land Exchange: Section 25 is owned by WDFW and includes the upper half of Chair 4, Windy Ridge, Bowl 4, and overlaps with the proposed project. Per the DEIS, WDFW said:

"...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." Hunters use the section during archery and rifle seasons as well as for forest grouse hunting. Mule deer, Colockum Elk, golden eagles, goshawks, pika, marmots, bobcats, mountain lions, coyotes, and black bears regularly use the section's wildlife corridors. Section 25's whitebark pine forests, springs and wetlands, talus slopes, and undisturbed shrub-steppe openings are vital wildlife habitats. This section grows more important as development threatens to destroy similar habitats on adjacent parcels. The DEIS discusses a land exchange between WDFW and Washington State DNR that would result in DNR owning Section 25 and implying that an expanded year-round resort would be allowable on DNR owned Section 25. However, the DEIS further states that: "The land swap is not part of the current Proposed Project...". With the land exchange not on the table, and DFW indicating that expanded year-round activity is not an allowable use of Section 25, section 25 should be excluded from any expanded ski resort or development activity.

Master Planned Resort Overlay: The developer is depending on this land use strategy that allows dense urban style development outside the urban growth boundary. Without the MPR, this level of development would violate the Urban Growth Act and could not be allowed. Despite depending on this planning tool, the development violates the requirements of MPRs including: The development is not primarily a destination resort, is not self-contained, does not consist of short-term visitor accommodations, does not consider affordable employee housing, and does not preserve the rural character or natural resource it uses.

These are just a few of the unclear, misleading, untrue, incomplete, arbitrary and persuasive statements in the DEIS. I expect Chelan County to stick to established codes and not bend the rules for the benefit of a developer. Since the development appears not possible without breaking County Codes, I urge you to select the No-Action Alternative which is the only alternative besides the full development build-out that is presented in the DEIS.

Thank you for considering my comments.

Kindly, Saxon Spillman From: Krin Parmley

To: <u>missionridgeeis@outlook.com</u>

Subject: Mission Ridge Master Planned Resort Expansion DEIS concerns

Date: Tuesday, October 21, 2025 4:21:10 PM

October 20th 2025

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

Dear Mr. Kaputa,

Thank you for the opportunity to provide comments regarding the DEIS for the proposed Mission Ridge ski area Expansion. The DEIS is full of omissions of impacts, inadequate mitigation of potential impacts, and incorrect assertions. Additionally, the proposed development violates Chelan County Codes. Because of this, I oppose the development and urge you to support the No Action Alternative.

I am a former employee who worked at mission ridge for 4 complete seasons from the 2019 to 2024. I loved working there but chose not to return for financial reasons.

Ground water:

The DEIS describes using on-site groundwater wells as the exclusive source of water until eventually being forced to transition to PUD water. By this strategy, all of phase 1 and about half of phase 2 could be built without a connection to the PUD water system. And what if the Developer chooses to stop there and not connect to PUD water? How much water will 253 condos/townhouses/duplexes, 127 family homes, the hotel with 57 rooms, and various resultants use year round?(these numbers are about half of phase two)

Additionally I could not find a single study that assesses the average amount of natural snowpack located within the "37.2 acres associated with the ski runs" proposed in the expansion plan. If the proposed new ski runs are located within roughly the same elevation level between the current base area at Mission Ridge and the top of chair 1; they will certainly require a good amount of snowmaking (like chairs 1&4 currently do). Just to maintain a safe amount of snowpack for recreation throughout the season (like chairs 1&4 currently do). An average commercial snow gun requires 160,000-200,000 gallons of water to cover 1 acre with 1 ft of snow.

By opening all of this new terrain located at a generally lower elevation than the rest of Mission Ridges current operational ski runs. They will most certainly require a large amount of snowmaking to sustain skiable runs. A study needs to be done on the average snowpack within the 37.2 acres. And also on how much ground water snowmaking would need to use on an average season to even keep these new runs operational. And assess alternative solutions and the adverse effects if the amount needed to stay operational exceeds the

Developers current water rights.

An additional more conclusive study should also be done to assess how it would in turn affect local fish bearing and non fish bearing streams, and anyone currently with water rights to the Stemilt and Colockum drainages.

Traffic on Squilchuck and Mission Ridge Road:

I have witnessed car accidents that block the road, seen co-workers, guests, and link bus vans slide sideways downhill on black ice in the passing lanes at the top of Squilchuck Rd. Half a dozen ditched cars on the sides of the roads on most really good snow days, and a few rolled cars every season.

On the morning of March 1st, 2022 I was in a +5 car car accident where 3 people narrowly escaped getting seriously injured, with no service to call for help, and no way for help to quickly get to us. All due to black ice that stretched from the top section of Squilquick road (start of the passing lanes) to the Beehive road turn off.

Mission Ridge's Skier Services Director Jodi Taggart and a MR cook nearly got crushed in between their own vehicles, and a MR Lift operator almost got crushed between his own tailgate and the cement barrier. All three of them were standing on the road assessing damage on their own cars after sliding hundreds of feet. When another truck flew past us and made it few hundred feet before losing traction on a curve and began sliding out of control back down towards us. I was in Jodi's vehicle with her daughter and a co-worker and yelled at Jodi to get off the road when I saw we were going to get hit. And in turn crush her and the MR cook who were both standing in between their vehicles bumpers. The truck narrowly missed the lift ops vehicle up-road from us who was still trying to stand up after falling between his tailgate and the cement barrier. And Jodi and the MR cook got to safety just before the truck slammed into us pushing both vehicles several feet.

This all happened in under 2 minutes but within 5 minutes we had been crashed into again by another truck. Someone out of the 20+ stuck cars and 30+ stranded people walked down to squilchuck state park in order to get cell service, to call the county so they'd send a dump truck with sand and de-icer. But we were there for over an hour. My point is these were all MR employees or MR ski team parents. People who have driven up to Mission Ridge literally hundreds of times and that black ice still caught us off guard.

By allowing overnight dwellings with the potential to house thousands of people most of which who have never been to or are relatively new to Mission Ridge; It poses a significant risk to themselves, other drivers, wildlife, and the houses lining Squilchuck rd and Mission Ridge rd at potentially all hours of the day and night year round.

One road up or down, known to locals to be hazardous often, with little to no cell service in its most dangerous sections, and projected to get the equivalent of double Steven's passes traffic daily. Do you truly believe this will not directly result in an unacceptable increased loss of life for wildlife and humans, and property damage for local homeowners as well? Our community and lives should not be burdened or put at risk by unprepared or inexperienced drivers that financially benefit a developer and hurts the rest of us.

More needs to be done to improve the road for public safety before allowing this much traffic. More detailed accident studies need to be done on current accident reports surrounding holidays and above average weekends on these roads. And projections of how much those accident rates will increase with such an influx of people from out of town driving up and down.

These are just a few of many more issues that need to be looked at again. I strongly encourage Chelan County to stick to established codes. And since the development breaks County Codes, I urge you to select the <u>No-Action Alternative</u>, which is the only alternative besides the full development build-out that is presented in the DEIS.

Thank you for considering my comments.

Krin Parmley

39 S Union Ave, East Wenatchee

From: Saxon Spillman

To: <u>missionridgeeis@outlook.com</u>

Subject: Mission Ridge Master Planned Resort Expansion Draft Environmental Impact Statement

Date: Tuesday, October 21, 2025 4:21:08 PM

September 20, 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,

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Secondary Access to the development: A second access road is required and would provide an alternate escape route if ever needed. However, the DEIS presents secondary access as an alternative. Secondary access is not an alternative; it is a code requirement. The DEIS recognizes that the second access would make a safer situation, stating in section 4.2.1.6 that: "Having more than one evacuation route provides redundancy and increased safety, particularly during unexpected or fast-moving events." Yet, the developer argues that providing a single "wider" 28-foot access road will make up for the danger of not having an emergency exit. This offering of a single "wider" road is persuasive and misleading. The current Mission Ridge Road is 28 feet wide and is not adequate for the proposed development's traffic. The proposed "wider" road is the same width as the existing road and won't even meet minimum County standards.

WDFW Land Exchange: Section 25 is owned by WDFW and includes the upper half of Chair 4, Windy Ridge, Bowl 4, and overlaps with the proposed project. Per the DEIS, WDFW said:

"...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." Hunters use the section during archery and rifle seasons as well as for forest grouse hunting. Mule deer, Colockum Elk, golden eagles, goshawks, pika, marmots, bobcats, mountain lions, coyotes, and black bears regularly use the section's wildlife corridors. Section 25's whitebark pine forests, springs and wetlands, talus slopes, and undisturbed shrub-steppe openings are vital wildlife habitats. This section grows more important as development threatens to destroy similar habitats on adjacent parcels. The DEIS discusses a land exchange between WDFW and Washington State DNR that would result in DNR owning Section 25 and implying that an expanded year-round resort would be allowable on DNR owned Section 25. However, the DEIS further states that: "The land swap is not part of the current Proposed Project...". With the land exchange not on the table, and DFW indicating that expanded year-round activity is not an allowable use of Section 25, section 25 should be excluded from any expanded ski resort or development activity.

Master Planned Resort Overlay: The developer is depending on this land use strategy that allows dense urban style development outside the urban growth boundary. Without the MPR, this level of development would violate the Urban Growth Act and could not be allowed. Despite depending on this planning tool, the development violates the requirements of MPRs including: The development is not primarily a destination resort, is not self-contained, does not consist of short-term visitor accommodations, does not consider affordable employee housing, and does not preserve the rural character or natural resource it uses.

These are just a few of the unclear, misleading, untrue, incomplete, arbitrary and persuasive statements in the DEIS. I expect Chelan County to stick to established codes and not bend the rules for the benefit of a developer. Since the development appears not possible without breaking County Codes, I urge you to select the No-Action Alternative which is the only alternative besides the full development build-out that is presented in the DEIS.

Thank you for considering my comments.

From: <u>David Blandford</u>

To: missionridgeeis@outlook.com

Subject: Mission Ridge Expansion Comments

Date: Tuesday, October 21, 2025 4:01:00 PM

This is to offer support for the proposed expansion of Mission Ridge Ski & Board Resort Expansion Project.

My organization, State of Washington Tourism, serves as Washington's official destination marketing organization and we work in collaboration with tourism industry businesses and regional destination marketing and management organizations, chambers of commerce, land managers and recreation groups to advance and protect Washington's tourism economy while working to responsibly promote and protect sensitive public lands and resources.

I believe the Mission Ridge expansion will bring new tourism dollars and support local businesses year-round while enhancing access for underserved groups and outdoor recreationists and driving economic development for the Wenatchee area and central Washington region.

This long-sought expansion would make Mission Ridge a year-round destination with skiing, biking, hiking, and Nordic trails that attract diverse visitors. Year-around tourism will support business and small business development throughout the Wenatchee Valley.

Responsible travel and tourism is a key priority of State of Washington Tourism, and we are glad to see that more than 600 acres will preserved for conservation and open space, ensuring environmentally responsible growth and aligning with statewide tourism goals for sustainable, four-season recreation and stewardship of public lands.

We understand that developers care about keeping Mission Ridge independently operated and community-focused, preserving local character. These values are critical to shaping Washington's tourism infrastructure in the coming decades – smart growth, responsible tourism and close alignment with community priorities and integrity.

We are supportive of this proposed expansion and excited by the visitor offerings and regional sustainable tourism and recreation benefits it will generate.

Please feel free to contact me if you have any questions or need additional information.

Sincerely,
David Blandford
CEO
State of Washington Tourism
(206) 713-8314
david@stateofwatourism.com

From: Rebecca Larsen

To: missionridgeeis@outlook.com
Subject: Rebecca Larsen comment

Date: Tuesday, October 21, 2025 3:35:24 PM

October 21st, 2025

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

Dear Mr. Kaputa,

Thank you for this opportunity to comment on the Mission Ridge Master Planned Resort Expansion DEIS. I am very concerned about this proposal and its potential impacts. I was one of the first home owners in the Forest Ridge subdivision, living there for nearly 30 years. What attracted me to the area was the quiet, rural nature of the Squilchuck basin, close proximity to our hometown ski area Mission Ridge, and the short distance to Wenatchee for necessities. This project not only doesn't meet Chelan County Code requirements, and causes numerous significant impacts that can't be mitigated, but it will completely destroy the things people cherish most about the Mission Ridge area.

I've been made aware of many inaccuracies, inadequacies, persuasive language, and faulty methodologies throughout the DEIS. Some of the most concerning to me are listed below my letter. Even though those paragraphs are taken from a template, I have read them, and I wholeheartedly agree with them and would like my comment to be given equal weight. In addition, the Plants and Animals section of the DEIS misses the mark on the amount and diversity of wildlife in the area. As someone who has lived less than a mile from the project area, several of the species that the DEIS dismisses as not being present, we've been observing for years. In regards to elk in the project area, the map used by the DEIS to claim that there is little high quality elk habitat in the project area, is completely untrue. That map shows high quality habitat in the Forest Ridge area, yet I can tell you I have barely seen any elk in the Forest Ridge area for the last 15 years. This is because there are now more homes, more people, and more disturbance, and the elk keep getting pushed farther and farther out of their habitat. Areas like the proposed project area, are highly utilized by elk because it is a safe refuge from disturbance, yet the Applicant now wants to push them out of there too, and justifying it by using a habitat map that is completely inaccurate. There are roughly 80 homes in Forest Ridge, and the Applicant wants to put in 260 homes, 600+ condos, and 110,000 square feet of commercial space. I can only imagine how much this will hurt the wildlife of the entire Mission Ridge area.

I ask that a new study of the areas wildlife and plant life is conducted, so that the public can truly understand what is at stake. I also ask that the issues listed at the end of my letter be addressed in the DEIS, so that the truth is available for both the public and County decision makers.

Mission Ridge and the Squilchuck basin are very close to my heart, and they are an integral

part of what people love about the Wenatchee Valley. This project would change the area for the worst, and once it's done, we will have lost it forever. We should think very carefully before destroying an area so special.

Sincerely,

Rebecca Larsen 211 Wetherald St. Wenatchee, WA 98801

- 1. Traffic on Squilchuck and Mission Ridge Road: The project predicts 10,000 vehicle trips per day on the Mission Ridge Road, which is roughly double the traffic on both Stevens Pass and Blewett Pass. The DEIS predicts that the development will snarl traffic to a condition below minimum Chelan County standards, yet the DEIS does not include mitigation or improvements to the Mission Ridge Road. 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...". Our community should not be burdened by snarled traffic that financially benefits a developer but hurts the rest of us.
- 2. Secondary access to the development: A second access road is required to provide an alternate escape route if needed. However, the DEIS only presents secondary access as an alternative. Secondary access is not an alternative; it is a code requirement. The DEIS recognizes that the secondary access would make a safer situation, stating in section 4.2.1.6 that: "Having more than one evacuation route provides redundancy and increased safety, particularly during unexpected or fast-moving events." Yet, the developer argues that providing a single "wider" 28-foot access road will make up for the danger of not having an emergency exit. This offering of a single "wider" road is misleading. The current Mission Ridge Road is 28 feet wide and is not adequate for the proposed development's traffic. The proposed "wider" road is the same width as the existing road and won't even meet minimum County standards. Chelan County should not bend its rules on secondary access to benefit a developer at the jeopardy of the safety of residents and visitors of the development he wants to build.
- 3. WDFW Land Exchange: Section 25 is owned by the Washington State Department of Fish and Wildlife and encompasses Windy Ridge and Bowl 4, the upper half of Chair 4, and overlaps with the proposed project. Per the DEIS, WDFW said: "...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." Hunters use the section during archery and rifle seasons as well as for forest grouse hunting. Mule deer, Colockum Elk, golden eagles, goshawks, pika, marmots, bobcats, mountain lions, coyotes, and black bears regularly use the section's wildlife corridors. Section 25's whitebark pine forests, springs and wetlands, talus slopes, and undisturbed shrub-steppe openings are vital wildlife habitats. This section grows more important as development threatens to destroy similar habitats on adjacent parcels. The DEIS discusses a land exchange between WDFW and Washington State DNR that would result in DNR owning Section 25 and implying that an expanded year-round resort would be allowable on DNR-owned Section 25. However, the DEIS further states that: "The land swap is not part of the current Proposed Project...". With the land exchange not on the table, the likelihood that it is illegal for DFW to swap the land, and DFW indicating that expanded year-round activity is not an allowable use of Section 25, Section 25 should be excluded from any expanded ski resort or development activity.

4. Master Planned Resort Overlay: Without the Master Planned Resort Overlay (MPR), the proposed level of development would violate the Urban Growth Act and could not be allowed. The developer is depending on this land use strategy which allows dense urban-style development outside the urban growth boundary. Despite depending on this planning tool, the development violates the requirements of MPRs including: Impacts are not fully mitigated, costs of public services are not fully borne by the developer, the development is not primarily a destination resort, is not self-contained, does not consist of short-term visitor accommodations, does not consider affordable employee housing, and does not preserve the rural character or natural resource it uses. Since the proposal does not meet the requirements for an MPR, the development should not benefit from the housing density allowed by an MPR.

These are just a few of the unclear, misleading, untrue, incomplete, arbitrary, and persuasive statements in the DEIS. I strongly encourage Chelan County to stick to established codes and not bend the rules for the benefit of a developer. Since the development breaks County Codes, I urge you to select the No-Action Alternative, which is the only alternative besides the full development build-out that is presented in the DEIS.

From: <u>lyramoss</u>

To: missionridgeeis@outlook.com

Subject: Mission Ridge Draft EIS Comment

Date: Tuesday, October 21, 2025 3:34:14 PM

Chelan County,

Thank you for the opportunity to comment on the draft EIS for the Mission Ridge Master Planned Resort (Chelan County File No. MPR 2018-128). I am writing to express my view that the County should select the No Action Alternative or amend the draft EIS to remediate deficiencies. These deficiencies include, but at not limited to:

- 1. the exclusion of a reasonable alternative that precludes residential and commercial development unrelated to the stated objective of improving outdoor recreation;
- the use of inaccurate or outdated information that makes threshold determinations about significance erroneous; and
- 3. inappropriate reliance on an old, incomplete USFS NEPA process.

As presented in this draft, the EIS does not include sufficient reliable information and analysis to support to conclusions of insignificance. The draft EIS evaluates a plan to build over 800 housing units to a remote mountain, previously used only seasonally for skiing. The proposed expansion is not just a geographic expansion of ski runs or facility update to support seasonal skiing, it converts the area to a commercial development that is will be used year-round.

The Proposed Project reaches far beyond its stated objective of improving outdoor recreation be adding in housing and non-ski related services. While the entirety of the proposal has been segmented across federal, state, and county planning processes, it is clear that "outdoor recreation" is a cover for significant urban development. While not mentioned in the draft EIS, the Development Agreement Application proposes theaters, galleries, beauty shops, and other commercial uses of the site, which are the literal opposite of outdoor recreation. The full scope of the planned development is not presented in the EIS, but a more diligent look at even just the portion that the applicant has presented here leaves any reasonable person to the conclusion that there will be significant impacts and a net loss in the quality of outdoor recreation.

1. Additional Alternative to Meet the Objective(s)

The EIS is insufficient because it does not contemplate an alternative that includes expansions to outdoor recreation access and facilities without the additional residential and commercial development. The project's **objective**, as stated in Section 2.1, is to expand Mission Ridge and provide year-round recreation opportunities. It specifically lists only 4 limitations that must be improved: parking, more beginner terrain, recreation for non-skiers, and overnight accommodations. Section 2.1 goes on to state that the project is necessary to "provide diverse outdoor recreation opportunities sufficient to meet public demand, both locally and regionally." Based on that objective, an alternative that excludes residential and non-outdoor recreation commercial development could still meet the objective and is therefore a reasonable alternative that must be considered.

While the EIS Section 2.5 includes a quote from the 1999 King County vs Central Puget Sound Board decision that mandates consideration of reasonable alternatives that "attain or approximate a proposal's **objectives**", this proves to be lip-service, as if stating the law is the same as complying with it. The only alternatives to the planned development considered in the draft EIS are the no action alternative and one that incorporates power utility planning into the analysis (which was dismissed from consideration). The draft EIS makes no attempt to look at alternative ways of meeting it objective, showing a pre-decisional bias.

The applicant uses buzzwords about improving outdoor recreation to disguise the actual goal and driving force behind the project – real estate development. There is nothing about adding over 800 residences that provides, increases, or enhances any of the outdoor recreation opportunities already available on site. Adding ski lifts and associated support facilities would increase human access to the site and could possibly be done without causing significant, year-round disruption to the environment. However, turning the site into a commercial and

residential development will have significant adverse impacts on the natural environment and the outdoor recreationists.

This is not the first mention of public interest in an alternative that excludes the vast residential development. USFS disregarded a similar "no residential development" alternative in their 2020 draft EA because it was outside their authority. However, it is not outside the authorities involved in this SEPA analysis because the State, county, and local governments do have the authority to approve or deny various aspects of the applicant's proposals.

2. Inaccurate and/or Outdated Information

The draft EIS fails to use the most recent information on a number of subjects. For example, the analysis of effects on gray wolves (Appendix G) is inadequate because it does not contain current information on the population, only provides general facts about wolves unrelated to the potential site specific impacts and does not address potential take as defined by the Endangered Species Act (ESA). Section 3 of Appendix G explains that the analysis relies on the consultant's 2018 and 2020 resource reports, not current information. Given the inadequacies of the 2025 report, relying on similar previous work products is likely negligent.

Specifically, regarding the analysis of impacts on ESA-listed gray wolves, as of Dec 2024, WDFW reports there are at least 230 wolves and 43 packs in the state. Even though Appendix G is supposed to be a 2025 report about the plants and animals in the project area, it cites to wolf population data from 2016, when there were only 90 wolves in Washington. WDFW also documented the Naneum gray wolf pack using the Mission Ridge project area, but the EIS ignores this and cites to a 2019 report and says that the pack is only "close" to the project area. This does not indicate that the draft EIS' preparers used the best available information or that it accurately discloses likely impacts. While I could go on about all of the flaws created by the use of outdated information, it is not my job as a private citizen to provide the applicant or it's paid consultants with information that they should've reviewed and documented when conducting their analysis. The conclusions as to the significance of the project on wolves is arbitrary and capricious and a revised draft should be prepared using the best available science.

The analysis of gray wolves is also incomplete. Section 4.1.1.3 of the analysis (Appendix G, pg G-38) says it will consider 3 factors when evaluating impacts to gray wolves – potential disturbance to pup rearing, changes to security habitat, and effects to prey. While this is a good start, it does not include all potential take pathways prohibited by the Endangered Species Act (e.g., harassment from increased human use, harm from habitat modification). Additionally, Appendix G fails to provide discussion of effects to the wolves' prey species, instead simply saying that deer and elk are plentiful in the area. That assertion does not consider the impacts this project will have on the elk and deer populations.

Further, the draft EIS also does not mention the interdependent and interrelated actions associated with the entirety of the proposed Mission Ridge development. There is only cursory mention of potential human-wildlife conflicts that are likely to result from increasing the volume and duration of human presence on the site. The analysis says that the proposed action will result in wolves not using the area, but increasing wolf conflict

[1] reports indicate that is not true. The document does not discuss, disclose, or acknowledge how putting an isolated residential development that supposedly emphasizes outdoor recreation in a remote area of known wolf activity could result in future human-wildlife conflicts. When the proposed project results in conflicts between humans and wildlife, requiring more difficult decisions and environmental processes/approvals (e.g. lethal wolf removal), it will not fall to the applicant, but by the public entities left to clean up the predictable mess they ignored.

Another example of incomplete or outdated information in the draft EIS is its failure to analyze potential impacts to wolverines, another ESA-listed species. The species was listed as threatened in 2023, subsequent to the USFS draft EA. The EIS's dismissal of the issue cites to a single email from a USFS Recreation Supervisor, not a USFWS Ecological Services wolverine specialist, without any qualifying information or quotation, to assert that

wolverines are not at the site. Wolverines are highly mobile and to make a determination that they cannot be preset on a site, based on a single, unvetted email, is capricious. Wolverines have been documented traveling

well beyond their core habitat in Washington and Oregon. Wolverine presence has been confirmed by [3] management authorities in Westport and Long Beach, WA, with one Washington wolverine individual dispersing from the Cascades to the Columbia River, then further south to Oregon's coastal beaches. The project site is much closer to core wolverine habitat than Long Beach, WA is, so the analysis should include a substantive review of the impacts.

These examples are just a couple of the analyses that did not use the most appropriate reference materials. It's impossible to take the rest of the assertions at face value because of these discrepancies. I encourage the agency to carefully re-review the entirety of the analysis and rectify the oversights in an additional draft EIS so the public and decision-maker can evaluate a more accurate analysis.

3. USFS NEPA Process

The draft EIS relies on the 2020 USFS draft EA on portions of the project. Based on the time that has passed since that analysis was completed, the USFS draft EA is out of date and cannot be relied upon to issue a NEPA Decision/FONSI for at least 2 reasons. The first is the environmental baseline represented in that analysis is not entirely the same as the current environment. The 2020 EA did not consider the notable changes in wolf distribution and abundance, recent wolverine listings and dispersal, or other more recent changes, such as changes in the public's outdoor recreation activities in the wake of COVID.

The second reason that the 2020 draft EA cannot be relied upon is that it does not comply with current CEQ NEPA guidance or the 2025 USDA NEPA regulations. The draft EA was prepared prior to several landmark court rulings, prior to CEQ rescinding their regulations, and prior to USDA issuing an entirely new set of NEPA implementing regulations that took effect immediately. The draft EA does not account for the newly defined significance factors, leaving serious legal questions about any subsequent determinations of significance made by USFS.

USFS should also be cautious about relying on this draft EIS in preparing their NEPA documentation/decision, because this draft EIS does not provide convincing analysis to support the various conclusions regarding significance. USFS must do an EIS to meet their NEPA obligations, including public involvement, because the analysis presented here does adequately convince the reader that the impacts of such a large development will be insignificant. The draft EIS makes sweeping conclusory statements without identifying or describing the likely impacts, leaving analysis related to the most sensitive species, ESA listed species, to a future analysis to be conducted by USFS. This means that the draft EIS does not take into account the effects on those species or disclose them to the public, it simply says "don't worry, we will take care of them later". This is wholly unacceptable for a Finding of No Significant Impact and should preclude the issuance of a final SEPA EIS unless the analysis is amended.

The applicant's reliance on USFS to conduct the ESA analysis also side steps ESA Section 10 requirements for non-federal entities to consult with U.S. Fish and Wildlife Service and create enforceable Habitat Conservation Plans or other arrangements to address adverse impacts to listed species. USFS should not have to bear the resource burden of consulting on a matter benefitting private developers. USFS staff and resources are strained to the breaking point at this time, and the applicant should bear the full costs of environmental compliance.

If the proposed action goes forward, there will be year-round construction for years to come, in an area that was previously quiet for most of the year. After that, the inhabitants will continue to disturb and alter the natural state year-round. Seasonal ski activities will be turned into year-round anthropogenic noises and lights, adolescent shenanigans, firework use with risks of wildfires, along with any number of other human-related disturbances to the natural state. This represents a significant departure from the environmental status quo and must be accounted for in the draft EIS, and instead they are ignored or disregarded by stating the people will follow all the rules.

Any reasonable person can see that even if the development is ultimately deemed a benefit to the public, it will come at a significant cost. This project will result in significant impacts and the analysis glosses over the facts and

fails to disclose the actual impacts. Further analysis and disclosures are necessary, and the conclusions about significance should reflect the reality that any reasonable person can infer.

Thank you for the comment opportunity and your time,

Lyra Moss

[1] https://wdfw.wa.gov/sites/default/files/2025-04/2024-final-annual-wolf-report-briefing-fwc-april.pdf

Sent with Proton Mail secure email.

^[2] https://ecos.fws.gov/docs/recovery_plan/NA_Wolverine_Recovery_Outline_Wolverine_20231221_signed.pdf

^[3] https://chinookobserver.com/2020/05/27/rare-beast-visits-the-beach-wolverine-confirmed-in-pacific-county/

^[4] https://www.opb.org/article/2024/06/08/wolverine-sightings-oregon-continues/

From: Stella Day

To: <u>missionridgeeis@outlook.com</u>

Subject: Mission Ridge Expansion Master Planned Resort Draft EIS

Date: Tuesday, October 21, 2025 2:57:01 PM

I am writing to urge you to select the No Action Alternative for the proposed Mission Ridge development. The DEIS fails to adequately address impacts to wildlife, habitat, and public safety, and does not meet Chelan County's standards for responsible growth. As a long time Wenatchee Valley resident and Mission Ridge skier, I am very concerned with this proposal.

The traffic on Squilchuck road is a major issue with the proposed project. The project creates a *level of service* condition below the minimum accepted Chelan County standard, yet no mitigation is proposed. The DEIS should be updated to acknowledge the possibility of very large uncontrollable wildfires and to assess risk associated with the current, not historical, condition of the surrounding forest.

The area surrounding Mission Ridge provides critical habitat for mule deer, elk, and wideranging carnivores such as black bears and cougars, as well as for species of greatest conservation need, including northern goshawks, golden eagles, whitebark pine, and American pika. These mountain and shrub-steppe transition zones are particularly sensitive to disturbance, serving as essential corridors for seasonal migration and climate adaptation. Fragmenting these connected habitats would cause long-term harm to wildlife movement, watershed health, and overall ecosystem resilience.

These foothills and forested slopes are part of a larger ecological network linking the Cascade crest to the Columbia Basin. Protecting their continuity supports not only iconic wildlife but also the long-term resilience of forests and watersheds, which face increasing drought, heat, and fire risks under a changing climate.

The proposal also depends on exceptions to Chelan County codes, enabling expanded human development in a fire-prone, high-elevation landscape. Increased human activity would elevate wildfire risk, strain emergency response capacity, and degrade sensitive habitats that wildlife depend on for survival. These risks are precisely why county planning standards exist: to safeguard public safety and ecological integrity alike.

Conservation and community are not opposing goals. Upholding existing land use protections honors both people and place by ensuring that wildlife, clean water, and natural character remain part of what makes this region special. Thoughtful planning today ensures that future generations can continue to hunt, hike, ski, and find connection in landscapes that remain wild and whole. Please select the No Action Alternative to protect the Mission Ridge landscape and the shared benefits it provides for wildlife and the community alike.

Sincerely,

Stella Day 424 Price Ave Leavenworth, WA From: Ali Gray

To: missionridgeeis@outlook.com
Subject: Mission Ridge DEIS Public Comment
Date: Tuesday, October 21, 2025 1:51:26 PM

Thank you for the opportunity to provide public comment on the proposed Mission Ridge expansion DEIS.

As a resident of Chelan County and fervent supporter and lover of Mission Ridge and its surrounding environment, I am extremely concerned about the Mission Ridge expansion and much of the information in the DEIS. I believe that the DEIS doesn't fully address many concerns my community and I have about the project.

Water

I don't see that the DEIS adequately covers the issue surrounding water rights and availability for the area. Many, many residents and orchardists up Squilchuck Canyon and the surrounding area rely on water originating from near Mission Ridge for their homes and livelihoods. The availability of water will only decrease with a warming and drying planet – we've already seen how drought-stressed the landscape has become over the summer in recent years. And I'm very concerned about sewage treatment and potential contaminated runoff from the OVERLY LARGE number of homes and condos the expansion calls for. As someone who grew up in a canyon very similar to Squilchuck in Southeast Idaho, I know how devastating it was for neighbors to have their wells run dry, and how contentious it often became over water rights for the creek and aquifers.

Fire

I also don't see that the DEIS adequately addresses the many (and increasing) concerns with fire. Relying on people to use a trail for escape if the main road becomes blocked is just a joke (that goes for any number of other road blockage issues, including landslides and traffic accidents). I don't believe that protecting hundreds of empty second homes is worth the immense danger posed to firefighters trying to save them in the case of a wildfire. The DEIS doesn't account for the increased risk and likelihood of wildfire with climate change, or the trouble people living in the WUI already face trying to pay for (and even maintain) home insurance. Good luck trying to sell one of the homes up there in the coming years, when no one with a mortgage will be able to purchase the home, which will then be left to sit for firefighters to risk their lives for. UGH.

Also, who is going to pay for building and maintaining the increased power up the canyon? Will the PUD be responsible for a fire caused by those lines? Not to mention that people cause most wildfires, hundreds more residents will drastically increase the likelihood of wildfire, or a residential fire that ignites a wildfire. I distinctly remember sitting on our deck in Idaho as a kid and watching fires, flames included, that neighbors had started up our canyon, with other neighbors who had been evacuated joining us. We were evacuated once, and always had our essentials piled in a spare room every summer, ready to go. It's not fun.

Road

There will be plenty of other comments regarding the road, the increased traffic, and its width and lack of backup. I'll leave those comments for others to address, but this is a huge issue for me as well. As someone who lived on a similar canyon road, I can comprehend how anxious Squilchuck residents must be over the HUGELY increased traffic the expansion would bring,

along with the safety and inconvenience issues it would bring. And let's face it, I don't want to be stuck in traffic when I go skiing. The lack of traffic and crowding at Mission Ridge was one of the top reasons I moved to Wenatchee five years ago.

Wildlife

I'm very concerned about the impacts to wildlife habitat and migration routes the expansion poses. I spend a lot of time at Mission Ridge and in the surrounding mountains year-round, and pretty much always see signs of elk. And I've pretty much always heard or seen pika in the area's scree fields during the snow-free months. The fact that Mission quiets down in the non-winter months allows the local, native wildlife to take a breath of relief and lead their lives the way they're meant to, without the emotional and physical disruptions of thousands of people. The same goes for the night ours during the season. Having hundreds of people living up there full time will never allow for these break/rest periods, and I'm deeply concerned about the stress this will cause the area's wildlife.

Cultural and economic impacts

I know that a DEIS public comment isn't the place for these types of comments, so I'll keep it short. Mission Ridge was the number one reason my partner and I moved to Wenatchee five years ago. Skiing is immensely important to both of us, and the availability of an AMAZING ski area 25 minutes from our door, where we can have fun, be in nature, meet friends and strangers alike, ski amazing terrain, and revel in the incredible kindness and local vibes Mission has to offer, all without getting stuck in traffic, missing out on a parking spot, or waiting in never-ending lift lines. Mission is a small-town local area, and the culture there is a gem in the world of corporate ski resort take-over. It's rare. It HAS to be protected. We love our out-of-town visitors, but we don't need double the number of them. We all know the homes and condos up there will be snatched up by West-siders bypassing the messes that are Stevens Pass and Crystal, and the residences will be second homes and sit vacant most of the time. And with the retail and restaurants up there too, people will stay up on the mountain and not make the long drive down to support Wenatchee businesses nearly as much as is being advertised. The vast majority of local folks won't have the financial capability to purchase a residence up there.

Thank you for considering my comments. Alexa Gray 704 Kriewald Ct Wenatchee, WA 98801 From: Robert Scanlon

To:missionridgeeis@outlook.comSubject:Mission Ridge DEIS Comment

Date: Tuesday, October 21, 2025 12:17:21 PM

Mr. Mike Kaputa, Chelan County Department of Natural Resources

My Name is Rob Scanlon. I live in Wenatchee and I am an engineer with 8 years of experience on projects both at the federal and municipal level, most recently in the water and wastewater sector. I believe the DEIS prepared by Mission Ridge Ski & Board Resort and Tamarack Saddle, Inc. is not only insufficient for the scope of the proposed project but also misleading the public of Chelan County. The proposed project represents not only a "Mission Ridge Expansion" per the DEIS title, but the development of one of the largest communities in Chelan County (proposed 2,658 person residential occupancy would rank 5th amongst cities in Chelan County according to census.gov data). This project will not only vastly reshape Mission Ridge and the Squilchuck drainage, but it will also have substantial impacts to the City of Wenatchee and Chelan County as a whole. The DEIS fails to adequately address these impacts. Furthermore, the stated "current limitations impeding resort operations" are either able to be mitigated with substantially less environmental impact, likely to be worsened by the proposed project, or arguably false.

The existing limitations listed are "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". Parking facilities at Mission Ridge can be constructed without the need for a nearly 1,000 structure residential development which will have a significantly greater environmental impact than parking alone. Crowding on beginner ski trails will likely be worsened by the 4,000 extra daily visitors to Mission Ridge. For recreation opportunities available to non-skiers, Mission Ridge is home to a large array of activities (mountain biking, dirt biking, horseback riding, trail running, hiking, hunting, and more). Each of these activities will be greatly impacted by the proposed construction, development, and 4,000 additional daily visitors. These activities do not necessarily represent "resort operations", however the resort operates on leased public land and has a duty to sustain the availability of the public to participate in these activities. Furthermore, the resort itself has plenty of recreation options to non-skiers including concerts, restaurants and bars, scenic chairlift rides, fall and summer festivals, and more. Lasty, I do not believe a lack of onsite overnight accommodations greatly affects resort operations. Mission Ridge is 25 minutes from Wenatchee making it one of the few resorts in Washington to have close access to a large population center (Mt. Baker/Bellingham and White Pass/Yakima are the next closest and both are over an hour away from their respective cities). Widely available travel data clearly demonstrates that people are willing to drive or fly for hours to ski. Despite all of these alternatives to mitigate the "current limitations", Mission Ridge Ski & Board Resort and Tamarack Saddle, Inc. could not propose a project alternative in the DEIS.

I have reviewed the sections of the DEIS in my area of expertise and I have several concerns. First, regarding the proposed LOSS system and second, regarding the projected traffic counts on Squilchuck Road. The DEIS proposes a LOSS with very little detail into the actual operation or capacity of such a system. Furthermore, they have provided no evidence of the successful operation of the two existing LOSS systems that Mission Ridge already maintains. They have provided no surface or groundwater tests to prove that their existing systems are within current required permit levels, yet the DEIS maintains that a significantly larger LOSS will be sufficient to meet WDOE regulations. Many municipalities within Chelan County with populations lower than the projected 4,000 daily visitors have Wastewater treatment plants. The DEIS for this project gives only brief mention to the potential of a WWTP and fails to address any other effluent method other than discharge to Squilchuck creek which is likely of insufficient size for discharge. This is a gross oversight. For Squilchuck Road, the DEIS estimates 9655 daily trips. This would make Squilchuck road one of the busiest roads in the county (behind only Hwy 2 and Hwy 285). The DEIS fails to identify this and fails to appropriately address this traffic volume outside of relatively minor traffic improvements.

Mr. Mike Kaputa, I implore the county to use every means possible to thoroughly evaluate this DEIS. Given the misleading project title, the opening paragraph of the DEIS notice containing gross oversights, and the oversights I have noted in my area of practice, I have serious concerns about the accuracy, methods, and level of detail provided in this DEIS.

Thank you,

Rob Scanlon
robertpscanlon@gmail.com
1301 Ormiston Street, Wenatchee WA 98801

From: Fred Eschen

To: <u>missionridgeeis@outlook.com</u>

Subject: Mission Ridge DEIS

Date: Tuesday, October 21, 2025 11:56:56 AM

Washington needs more ski areas and ski opportunities. Washington also needs to conserve its dwindling wildlife and wild places. This proposal does neither and would ruin Mission Ridge ski experience as well. Please don't. Sent from my iPhone

From: Ashley Sinner

To:missionridgeeis@outlook.comSubject:Mission Ridge Ski & Board ResortDate:Tuesday, October 21, 2025 11:56:17 AM

Attachments: image001.png

Mission Ridge Expansion Letter of Support.pdf

Dear Director Kaputa,

As the Director of Visit Wenatchee, I am thrilled to offer my strong support for the Mission Ridge Ski & Board Resort Expansion Project, which aims to enhance existing services and expand year-round outdoor recreation opportunities in our region.

Visit Wenatchee promotes the Wenatchee Valley to overnight visitors for the benefit and well-being of our residents. Mission Ridge plays a critical role in Wenatchee's tourism economy. Each winter season, it draws thousands of ticket holders to our valley — not only to enjoy world-class skiing and snowboarding, but also to explore our restaurants, breweries, hotels and local businesses. This activity generates valuable tax revenue that supports the quality of life of our residents.

Mission Ridge helps define Wenatchee as a destination for winter sports and outdoor recreation. They have achieved this through thoughtful recreation management, responsible land stewardship and a culture that proudly puts the community first. Data from Visit Wenatchee shows that most outdoor recreationists at Mission Ridge come from our local community, underscoring the resort's strong local roots and community-first values. The proposed expansion not only strengthens its winter offerings but also creates new opportunities for year-round outdoor recreation, adding even greater value for local residents. As Mission Ridge seeks to thoughtfully and sustainably expand its operations, its commitment to the local community remains steadfast.

We are proud to support the Mission Ridge Ski & Board Resort Expansion Project and encourage Chelan County to approve the permit application.

Sincerely,

Ashley Sinner



From: <u>Lisa Foster</u>

To: <u>missionridgeeis@outlook.com</u>

Subject: Mission Ridge Master Planned Resort Expansion DEIS comment letter

Date: Tuesday, October 21, 2025 10:48:21 AM

Attachments: MR DEIS comment letter.pdf

Dear Mr. Kaputa,

Thank you for the opportunity to provide comments on the draft EIS for the Mission Ridge Expansion. I am a fourth generation skier in the Squilchuck basin. I grew up skiing the same terrain my grandparents and great grandparents skied. I was on skis as soon as I could follow my mom to her job on ski patrol and I raced for the Mission Ridge ski team. Ski instructing at Mission Ridge was one of my first jobs after college. I believe that the proposed expansion of Mission Ridge will put our skiing community and the greater community at risk. I urge you to support the No Action Alternative.

The DEIS is deficient regarding detrimental impacts to wildlife and native plants, increased water use in headwaters, elevated wildfire risk and lack of safe escape routes, climate change impacts, and traffic impacts on roads that are not compliant with county codes. This proposed expansion does not meet Chelan County Code requirements and will cause more harm than good for our community.

Impacts to wildlife and plant species

The project area provides important habitat for migrating elk, golden eagle, pika, and goshawk. The DEIS did not adequately survey for these species and inaccurately claims that several of these are not present.

Two plant species on the WDFW Priority Habitats and Species (PHS) list are within the development footprint, *Anemone patens* and *Pinus albicaulis*, and need additional research in the EIS.

Lack of adequate water and water percolating soils

The DEIS acknowledges the likelihood of water rights disputes and allocations to senior rights holders, due to limited capacity within the basin. The DEIS inaccurately assumes homeowners in the new development will only reside there when water is plentiful in winter, ignoring the speed with which this valley is growing and that there are likely to be many year-round residents who will be using water year-round. This will directly negatively impact the amount of water available for fish and wildlife, downstream irrigators, and storage in the fire protection reservoir.

Basalt bedrock within the development footprint is not capable of supporting the proposed septic systems. As such, septic runoff will contaminate groundwater. The EIS lacks a soil profile analysis showing required water percolating soils for septic feasibility.

Inadequate fire protection plan

I grew up in a house that nearly burned down every few years, and I worked for 10 years as a wildland firefighter with the US Forest Service. I am surprised at how many people are unaware that toxic gases kill people in fires prior to flames. The idea proposed in the DEIS that residents could shelter in place elucidates a fundamental misunderstanding of fire. Residents would need to evacuate in the event of a wildfire, and the Mission Ridge Road would not adequately support the traffic, leading to a potential catastrophe. The

terrain traps and dense forests in this area would put firefighters lives at risk.

The EIS Fire Protection Plan does not comply with the expert advice from AEGIS Engineering who describes this location as not suitable for urban development.

Page 5: Fire Hazards: The isolated location of the Mission Ridge site presents 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.

The report is clear in the lack of certainty due to incomplete knowledge of how the ground water and surface-water flows in the Squilchuck Creek drainage interact, vary, and how groundwater recharge occurs. Chelan County needs to hire a hydrologist to evaluate the report and to incorporate climate-change forecasts.

Inadequate road

Squilchuck Road is a 28 foot wide Rural Collector which county code identifies as supporting 1,500-4,000 average daily trips per day. The developer predicts 10,000 vehicle trips/day, vastly more than allowed in Chelan County Code. 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.

I have limited my comments to my primary concerns with the DEIS as relates to the proposed expansion of Mission Ridge. I urge you to support the No Action Alternative.

Sincerely,

Lisa Foster Restoration Biologist, Trout Unlimited 4th generation Chelan County resident and skier 353 Hinthorne In, Leavenworth, WA 98826

(509) 293-1417 | Lfosterk@gmail.com

From: <u>Katanna Westfall</u>

To: <u>missionridgeeis@outlook.com</u>

Subject: Mission ridge resort expansion DEIS concerns

Date: Tuesday, October 21, 2025 10:27:06 AM

Dear Mr. Kaputa,

Thanks for the opportunity to provide comments on this expansion! I lived in forest ridge for about 5 years. This expansion project would negatively affect nearly every element I loved of living up there. From the insane amount of traffic that would increase on the road, to the gorgeous local spots that will be impacted by the development. I oppose this project. The biggest thing that concerned me was the blatant untruths told about what wildlife that would not be affected by the expansion. Golden eagles, pikas, elk, bobcats, etc were all mentioned to NOT be living and moving through the expansion area. Based on trail cams and personal experience I know that to be so far from the truth. What other lies are being told and things being covered up selfishly by them if they can't even provide correct assertions of what will/will not be affected due to the development. Seeing all the inaccuracies put into the DEIS is concerning and immoral. The project itself also goes against Chelan County codes. Below are a few examples of the issues within the DEIS.

Traffic on Squilchuck and Mission Ridge Road: The project predicts 10,000 vehicle trips per day on the Mission Ridge Road, which is roughly double the traffic on both Stevens Pass and Blewitt Pass. The DEIS predicts that the development will snarl traffic to a condition below minimum Chelan County standards, yet the DEIS does not include mitigation or improvements to the Mission Ridge Road. 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...". Our community should not be burdened by snarled traffic that financially benefits a developer but hurts the rest of us.

Secondary access to the development: A second access road is required to provide an alternate escape route if needed. However, the DEIS only presents secondary access as an alternative. Secondary access is not an alternative; it is a code requirement. The DEIS recognizes that the secondary access would make a safer situation, stating in section 4.2.1.6 that: "Having more than one evacuation route provides redundancy and increased safety, particularly during unexpected or fast-moving events." Yet, the developer argues that providing a single "wider" 28-foot access road will make up for the danger of not having an emergency exit. This offering of a single "wider" road is misleading. The current Mission Ridge Road is 28 feet wide and is not adequate for the proposed development's traffic. The proposed "wider" road is the same width as the existing road and won't even meet minimum County standards. Chelan County should not bend its rules on secondary access to benefit a developer at the jeopardy of the safety of residents and visitors of the development he wants to build.

WDFW Land Exchange: Section 25 is owned by the Washington State Department of Fish and Wildlife and encompasses Windy Ridge and Bowl 4, the upper half of Chair 4, and overlaps with the proposed project. Per the DEIS, WDFW said: "...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." Hunters use the section during archery and rifle seasons as well as for forest grouse hunting. Mule deer, Colockum Elk, golden eagles, goshawks, pika, marmots, bobcats, mountain lions, coyotes, and black bears regularly use the section's wildlife corridors. Section 25's whitebark pine forests, springs and wetlands, talus slopes, and undisturbed shrub-steppe openings are vital wildlife habitats. This section grows more important as development threatens to destroy similar habitats on adjacent parcels. The DEIS discusses a land exchange between WDFW and Washington State DNR that would result in DNR owning Section 25 and implying that an expanded year-round resort would be allowable on DNRowned Section 25. However, the DEIS further states that: "The land swap is not part of the current Proposed Project...". With the land exchange not on the table, the likelihood that it is illegal for DFW to swap the land, and DFW indicating that expanded year-round activity is not an allowable use of Section 25, Section 25 should be excluded from any expanded ski resort or development activity.

Master Planned Resort Overlay: Without the Master Planned Resort Overlay (MPR), the proposed level of development would violate the Urban Growth Act and could not be allowed. The developer is depending on this land use strategy which allows dense urban-style development outside the urban growth boundary. Despite depending on this planning tool, the development violates the requirements of MPRs including: Impacts are not fully mitigated, costs of public services are not fully borne by the developer, the development is not primarily a destination resort, is not self-contained, does not consist of short-term visitor accommodations, does not consider affordable employee housing, and does not preserve the rural character or natural resource it uses. Since the proposal does not meet the requirements for an MPR, the development should not benefit from the housing density allowed by an MPR.

These are just a few of the unclear, misleading, untrue, incomplete, arbitrary, and persuasive statements in the DEIS. I strongly encourage Chelan County to stick to established codes and not bend the rules for the benefit of a developer. Since the development breaks County Codes, I urge you to select the No-Action Alternative, which is the only alternative besides the full development build-out that is presented in the DEIS.

Thank you for your consideration.

Katanna Westfall 211 Wetherald st. Wenatchee, WA 98801 From: <u>Dorothy Ferguson</u>

To: <u>missionridgeeis@outlook.com</u>

Subject: Mission Ridge DEIS

Date: Tuesday, October 21, 2025 8:46:27 AM

Welcome to Wenatchee's Paradise! One way in. No way out.

Learn from Paradise Fire.

Areas of Refuge: In a Wildfire, in parking lots cars become bombs, toxic smoke from burning tires. People survived in parking lots with NO cars, fire trucks were spraying water over people laying in parking lot.

Learn from Paradise Fire.

Paradise Emergency Management and elected officials had emergency plans in place, this was a well prepared community. What could go wrong did go wrong!

Their advice image worse case scenario. Then multiply that by 100.

Learn from Paradise Fire.

Don't violate Chelan County Development Codes, adopted to keep people alive and safe; to build a new City, the size of Chelan, in forested mountains. 1 way in No way out Learn from Paradise Fire.

People died, many injured, everyone traumatized fleeing from the fire.



From: Mary Fairchild

To: missionridgeeis@outlook.com
Subject: NO TO PROPOSED DEVELOPMENT
Date: Monday, October 20, 2025 10:43:50 PM

Hello,

I've owned a home in the Forest Ridge development just down from the Mission Ridge resort for almost 20 years and the resort has been an important place for my family to spend time together on the ski hill and in the lodges. 5 of my nieces and nephews have learned to ski there and we continue to gather as a family regularly each ski season. I sincerely want to see the MR resort thrive and I'm all for increasing terrain to increase visitors but there is NO NEED for on-mountain housing and this proposed development plan far exceeds what is needed to get to profitability.

In the promotional video on the MR website, the owners say we need to expand to preserve mission ridge's lifestyle, but I think expansion at this level will dramatically change the MR experience as we know it – and not for the better. If I wanted to wait in long ski lines and fight in the lodge to get a beer then I would go to Stevens Pass. We selected this place for our family because of its rural family nature, and the scale of this proposed development is everything we DON'T want in a ski resort.

NO ON MOUNTAIN LODGING:

One of my biggest problems with the proposal is the on-mountain lodging which is absolutely unnecessary for this place to thrive. There are many existing hotels in town, and more can be built if needed to increase accessibility to the mountain. If the owner is willing to build a lodge with shops on the mountain, with fancy restaurants and additional condos then all of this could be done in town. Instead of shuttling people across the mountain to access the lifts, they'll need to be shuttled from town – but it would work, he'd make the same or more money by building in town and there wouldn't be the devastating impact on the mountain, environment and wildlife.

FIRE RISK:

Anytime you add more people to a dry area, the risk of fire increases. This is a critical reason why there should be no on-mountain lodging. Even though there would likely be fire pits etc... in the development area, the reality is people living on the mountain will want to be in the mountains more hours, some will want to build shacks in the woods with their friends that could come with fires being built outside of the designated areas. Motorized bikes, ATV's, side by sides can all spark and cause fires and without question those living on the mountain will own these vehicles and use them. Limit on-mountain lodging and the fire risk is reduced.

WILDLIFE:

One of my greatest concerns of any development at the resort is its effect on wildlife. At one time I was told there were limits to land use in the MR area because of elk migration. If this was true then, then why is this being allowed now? If we can be thoughtful about expanding services, building only what is needed to expand outdoor activities (no on mountain housing), then the impact on wildlife will be reduced. We regularly see bear, cougar, elk, deer, squirrels, pine martens, chipmunks, pika, grouse, woodpeckers, jays, goshawk, owls, osprey, ravens, chickadees, junco, flickers, grosbeaks, sparrows, finches, and many others birds. Also many animal species rely on upper wheeler reservoir as a watering hole so I don't support any development that will impact animals' ability to find water there. It's just so unnecessary to overbuild and displace animals purely because we don't have the vision to do more with what we already have.

PARKING:

In the promotional video the owners talk about the need for additional parking and this is true, an expanded MR in any form needs to address parking but more can be done to shuttle folks from parking areas in town. Building parking for an additional 5000 cars or whatever I read isn't smart or effective, building out transit options is the most logical way to mitigate this challenge.

INDOOR CAPACITY CONSTRAINTS/REBUILD and EXPAND CURRENT LODGES

The owners talked about the crowding in the lodges and desire to increase indoor capacity and this also makes sense to me. But instead of putting in a massive new development cutting into pristine mountain flora/fauna, they could tear down and rebuild/expand 3 new lodges in the same locations as the current main lodge, ski school lodge, and midway to significantly increase capacity to sell food/beverage, gift shop items, do ski rentals — and add rentals for snowshoes, guide services, evening entertainment etc... as they like. This kind of expansion is easy to get behind because it's better for the user, and will make money for the resort and owner (who has a history of reinvesting \$\$ into the mountain).

MULTIGENERATIONAL EXPERIENCE:

The owners say they want this mountain to continue to offer a multigenerational experience and I support that too – but again instead of a putting in a big development with on mountain housing, focus on what different generations value, expand offerings in summer and winter sports, expand evening entertainment, build out revenue generating festivals including outdoor music festivals. Putting in a bunch of expensive housing isn't going to help families recreate together, it's the activities that inspire the recreating, a kid doesn't care if it's sleeping in town or in an overpriced on-mountain condo.

GROWTH LIMITS:

In the promotional video, the owner says they'll see how things go as they get into the building process, that if it looks like 900 homes is too many then they'll stop at 500. But does

anyone in their right mind really think a developer would stop at anything below the approved number of units? And once they are into the build, they'll become desensitized to the impact and probably will want to add even more. I strongly recommend limiting the development now to the bare minimum. If it were me, I'd only support new ski lifts and rebuilding/expanding existing structures to make the resort more desirable to new visitors and support increased visitors on the mountain.

TRAFFIC/ROADS

As I said at the beginning, I have a home in forest ridge and I regularly drive the road up/down to the resort in the winter (and usually several times in the summer too). It's not a great road at current volume and adding 100,000 more skier visits each year on this existing road just isn't smart. The best way to add volume visitors to the mountain is to limit cars driving and parking at the resort. Build out a super nice shuttle service running up from town. Less impact, less hassle, and better for the environment.

SUMMER ACTIVITIES

One of the best ways the resort can make money is to increase traffic in the summer. This area is already a big mountain bike hub and more can be done to make this a major summer destination for mountain bikers. Could encourage other summer sports too – hiking, ebike trail to the top, outdoor mountain music festivals, all could be a way to bring people to the mountain where they'll want to spend money eating/drinking and recreating.

WINTER ACTIVITIES:

I support building out additional ski lifts to allow for additional visitors on the ski hill. In addition the resort could offer more guided snowshoe options, even into terrain not owned by the resort. Same for snow biking, x-country ski, etc... This could be run/managed by the resort and folks taken to nearby areas.

IN CONCLUSION

I really want Mission Ridge to be successful and for the owners to make money too – and it's entirely possible to improve all facilities, increase services, keep our rural mountain family feel – all while enjoying profitability. To replace lifts and lodges will require up front funding and that can be generated through public and private financing, entreprenuers have been raising money for generations and it's not going to require a big massive on mountain development to get them to profitability. There can be a bright future for MR going forward without the massive development being proposed and I hope you'll deny the proposed development in it's current form.

Thank you,

Mary Komarnitsky

6521 Forest Ridge Drive Wenatchee, WA 98801 425-466-6454 From: Bret Lindell

To: missionridgeeis@outlook.com
Subject: Mission Ridge Expansion

Date: Monday, October 20, 2025 10:09:43 PM

Dear Chelan County Department of Natural Resources,

I am writing in opposition of the proposed Mission Ridge expansion. As a lifelong resident of the valley, frequent Mission Ridge season pass holder, former employee and volunteer at Mission Ridge, child of a third-generation orchardist, and as an outdoorsman, I have many concerns with the draft Environmental Impact Statement.

With my ties to the farming industry, I am concerned with the withdrawal of water from aquifers in phase 1 and 2 prior to connection with PUD water and post connection when being used for snowmaking. Having skied at Mission since a child, I can attest that the area of the proposed expansion will require significant snowmaking efforts. It is my belief that further research needs to be done into how this withdrawal of water could affect downstream users not only on an average year but also in years of drought.

As someone who has driven the Squilchuck and Mission Ridge road countless times, a priority needs to be made for improving those roads at the project owners' expense before any phase of the project should be approved. Though the county makes an effort to maintain those roads, they are in no way adequate for handing the amount of increased traffic for construction of the project or recreationalists post construction. Sections of the Mission Ridge road show obvious signs of the road shifting and slumping, it develops numerous potholes every winter, and I have witnessed multiple wrecks and car/wildlife conflicts on those roads over the years. Between current recreational traffic in the winter and agricultural traffic in the summer, those roads are in no way adequate to handle the amount of increased use this project would generate.

With experience working in the survey field both public and private and being an advocate for public land, another concern I have is with the transfer of land from WDFW to DNR control. Currently, the WDFW land is not eligible to host a year-round ski resort as the contract which funded that land purchase did not allow for that. With regards to degradation of elk habitat on that land, I have to imagine currently having a winter ski area on the property has something to do with it. Despite this, I can attest to seeing deer within the ski area during the summer months and elk just outside the ski area boundary in spring, summer, and fall on multiple occasions. Not to mention bear sign, grouse, snowshoe hairs, pikas, and an array of other small mammals and birds in and around the ski area boundary. Though the WDFW may see that section of land as being

degraded elk habitat, there is no doubt in my mind that multiple species reside on that land and it may even serve as a sanctuary during hunting seasons. As it stands, both the WDFW land and the DNR land that has been proposed for the transfer, serve multiple wildlife species beyond just elk. Transferring the land to the DNR so permitting can be obtained would only disrupt and increase the strain on local wildlife populations due to year-round recreation and maintenance of facilities. This could be particularly impactful on migratory species such as elk and mule deer as they are already confronting loss of habitat on their current wintering and migratory corridors in areas such as Malaga, Wenatchee Heights, Burch Mountain, and the Wenatchee Foothills.

With regard to wildfires, I believe a more adequate plan needs to be put in place and a secondary escape route established before any level of development occurs at the proposed location. This poses a serious problem as the Secondary Access Report showed no feasible means of providing secondary access to the area. Despite this, one must be established if people are to live safely in the proposed development. Given the condensed and dry nature of the forest in and around Mission Ridge, it's not a matter of if a wildfire burns through the area but when. As we recently saw with the Labor Mountain Fire and Lower Sugar Loaf Fire, given dry conditions and strong winds, fires can easily become uncontrollable. In the case of the Labor Mountain fire, even a highway was not an adequate fuel break. The Carlton Complex Fire and Sleepy Hollow Fire are also great examples of the threat modern wildfires pose in our area. To assume firebreaks and thinning would negate this threat seems unrealistic. Furthermore, to validate sheltering in place as a feasible option in the event that the one escape route does get blocked, is to accept that innocent people may be put at risk or lose their lives in the event of a large uncontrollable wildfire.

Lastly, though measures are proposed to limit light pollution, citizens of Wenatchee and the surrounding area will surely experience increased light pollution from the proposed expansion. As someone who appreciates landscapes as natural as possible, I thought the increased lighting on chair two was bad enough. Though this is more opinion than anything, I have to believe there are others in the valley that feel the same way and do not want to see more lights in the Squilchuck basin lighting up our night sky. We also do not know how this increased lighting could be affecting wildlife such as deer, elk, and cougars who are often active at night.

Thank you for taking the time to read and consider my concerns with the draft Environmental Impact Statement. As a local and a long time skier of Mission Ridge, I hope the draft is revised, taking into consideration what is truly best for local wildlife and current residents of the Wenatchee Valley.

Sincerely, Bret Lindell From: <u>Christopher Carter</u>

To: <u>missionridgeeis@outlook.com</u>

Subject: Public Comment Mission Ridge Draft Environmental Impact Statement (DEIS)

Date: Monday, October 20, 2025 9:45:44 PM

TO: Mike Kaputa, Chelan County Department of Natural Resources

Submitted by: Christopher J. Carter AICP

As a local resident, lifelong skier and professional planner, I am deeply concerned that the current DEIS fails to meet the standards of objective analysis and public safety required under SEPA and Chelan County Code. The document understates fire and water risks, minimizes ecological and transportation impacts, and relies on persuasive language rather than robust science and enforceable mitigation. As a concerned citizen I must express my clear opposition to this project and note that the DEIS in its current form is inadequate, and must be substantially revised and recirculated before any permitting is considered.

This proposal represents one of the largest and most hazardous land-use conversions in Chelan County history. With 7,812 planned beds, parking for 5,500 people, 10,000 vehicle trips per day (twice the AADT of Stevens Pass), and up to 4,000 people onsite at once—nearly double the population of Leavenworth—the scale alone warrants exceptional scrutiny. Yet the current Draft Environmental Impact Statement (DEIS) underestimates environmental harm, misrepresents wildfire and water risks, and fails to assign fiscal responsibility to the developer.

This DEIS, as written, exposes Chelan County to substantial legal and financial liability under multiple provisions of Washington State law, including the State Environmental Policy Act (RCW 43.21C), Growth Management Act (RCW 36.70A), and public-duty standards for life safety and infrastructure adequacy (RCW 19.27, RCW 36.70B). The County cannot rely on a document that omits significant impacts, substitutes persuasion for analysis, and fails to demonstrate consistency with mandatory state and county codes. As a citizen and professional my concerns with this DEIS are five fold:

1. Wildfire and Life Safety

The DEIS significantly downplays wildfire danger. Its modeling is based on outdated forest conditions and ignores the widespread beetle kill and fuel loading that have developed over the past year. The assumption that "worst-case wildfires" would be contained within several days or weeks is both unrealistic and unsafe as we have seen seasonally in wildfire regime data for decades. As indicated in recent and all fires on record in our backyard ranges, fire behavior in large landscape blocks with

steep terrain, high winds, and heavy fuels can quickly overwhelm suppression capacity. The analysis must be updated to reflect current forest conditions and modern climate realities with soil moisture and precipitation trends.

The document's discussion of shelter-in-place and safe refuge areas is alarming and equally deficient. Declaring the Mission Ridge parking lot a "safe area" without heat-flux or radiant-energy analysis is irresponsible. The lot is undersized even for minimal occupancy and cannot be considered a compliant safety zone for the user load proposed. Suggesting that evacuation may not be required misleads decision-makers and places future residents and visitors at unacceptable risk. The DEIS must include site-specific safety-zone calculations and remove unsubstantiated assertions of safety.

The DEIS also relies on persuasive language to imply that future fuels treatments will protect the community. Such measures are speculative. If the County is to consider them in risk assessment, they must be enforceable permit conditions—funded and implemented by the developer before occupancy. Fuel treatments "no later than Phase 2" do not reduce risk today, this risk analysis and approach is aspirational, incomplete and inadequate.

Additionally the proposal's single access road is a critical failure. Chelan County's own code and the International Fire Code require redundant egress for developments of this size. The DEIS treats secondary access as an "alternative" rather than a life-safety necessity. A blocked road in a wind-driven fire event could result in mass fatalities. The "28-foot wide, well-maintained road" is not equivalent to redundancy, and the DEIS misleads the public by suggesting otherwise. Secondary access must be treated as an integral project element, designed and operational before any occupancy.

Chelan County Fire District #1 has already expressed serious concerns about emergency access and staffing. The DEIS proposes that the County—not the developer—fund and build a new fire station. This is inappropriate and should be a concern to all of us taxpayers who will be burdened by subsidizing a private development that both poses a risk. All new capital and operating costs necessary to protect the project must be borne by the applicant, with facilities installed or bonded prior to any occupancy permit.

2. Water Quantity and Riparian Habitat

The DEIS's treatment of hydrology and streamflow impacts is inaccurate and misleading. Section 5.3.3.1 claims that construction impacts to streamflow will be "minimal" because no surface diversions will occur. Yet Section 5.2 acknowledges 90 acre-feet of new groundwater withdrawals, and the project's own hydrology memo

states that deep bedrock fractures are hydraulically connected to surface waters. Groundwater extraction from a connected system will reduce baseflows and degrade riparian habitat. The assertion of minimal impact and short time analysis needs further scrutiny as the headwaters to the region's multimillion dollar fruit industry, drinking water, is therefore dishonest and must be removed.

Similarly, the claim that groundwater withdrawals "would not impact existing and downstream water supply or water rights" is unsupported. The basin is already overallocated, and any new withdrawal constitutes an unavoidable significant impact. These effects should be analyzed as Chapter 4 significant impacts, not minimized in Chapter 5. The County should require a connected groundwater—surface water model, quantify depletion effects, and identify enforceable mitigation such as acquisition or retirement of senior water rights.

3. Habitat and Biological Resources

The habitat maps that underpin Chapter 5.4 are inaccurate and out of date. Field evidence from the 2024-2025 Mission Ridge Trail Camera Survey confirms elk and mule-deer wintering, calving, and fawning activity throughout the project area—none of which appear on Figure 5.4-2. Figure 5.4-3 underestimates summer habitat value because it was never ground-truthed. Maps of invasive weeds, a threat to our region's agriculture, omit infestations of diffuse knapweed and Canada thistle along existing roads, and the "Special Plant Features" map omits numerous trees over 32-inch diameter that meet the criteria for east-side old growth. These omissions lead to flawed conclusions about ecological integrity and mitigation needs and need more scrutiny.

The DEIS must be revised using best available science, including recent trail-camera and field-survey data. Updated maps should show accurate elk and deer use, invasive weed extent, old-growth stands, and Priority Habitat and Species features such as snags and down logs at a higher resolution. All findings and mitigation throughout Chapter 5.4 must be revisited based on these corrected datasets. Invasive-species management should include binding measures for prevention, treatment, and monitoring.

4. Utilities, Public Services, and Costs

The DEIS acknowledges the need for new fire, water, sewer, and power infrastructure but fails to assign costs. It repeatedly implies that public agencies or Chelan County will finance service expansions, including a new fire station. This contradicts basic planning principles and SEPA mitigation policy. All infrastructure and service extensions required to protect the project must be developer-funded and operational before occupancy, including substations, power lines, water-supply improvements,

and emergency services. Consultation with CCFD #1 and other providers must be formalized through agreements and bonded arrangements to be paid by the developer appended to the final EIS.

5. Traffic, Land-Use Consistency, and Legal Exposure

Traffic modeling shows degraded level-of-service conditions on Squilchuck and Mission Ridge Roads without effective mitigation. The DEIS cannot lawfully approve a project that knowingly violates County standards.

The proposed Master Planned Resort (MPR) overlay also conflicts with its own eligibility criteria. The project is not a self-contained destination resort, lacks short-term visitor predominance, provides no meaningful employee housing, and fails to preserve rural character. Absent valid MPR designation, the proposal would represent **urban development outside the Urban Growth Boundary**, contrary to the Growth Management Act.

Additionally, the proposal depends on a **WDFW land exchange** that appears inconsistent with federal funding conditions. The Washington Department of Fish and Wildlife has stated that an expanded, year-round resort "is not an allowable use" under the U.S. Fish and Wildlife Service contract that funded the property's purchase. Proceeding in contradiction to this statement exposes Chelan County to litigation risk.

6. Required Actions

To protect public safety, environmental integrity, and County liability, Chelan County should require that the DEIS be revised and recirculated with the following corrections:

1.

Re-evaluate wildfire risk under current fuels, beetle-kill, and climate conditions.

- 2. Include secondary access as a mandatory, built, and operational component of the project—not an alternative.
- Conduct transparent consultation with CCFD #1 and make all life-safety improvements developer-funded and installed prior to occupancy.
- 4. Replace persuasive language with quantitative, enforceable mitigation for

wildfire, water, traffic, and habitat impacts.

5. Update all habitat, hydrology, and infrastructure maps with ground-truthed 2024-2025 data at a higher resolution.

 Recognize groundwater–surface water connectivity and treat associated streamflow depletion as a significant, cumulative and unavoidable impact, analyze overallocation and watershed water rights conflict.

7. Require legally binding funding and implementation agreements for all utilities, water rights, and emergency services.

This DEIS fails to meet legal, technical, and ethical standards. It misrepresents risk, omits major impacts, and transfers public costs to taxpayers. With traffic twice that of Stevens Pass, a transient population exceeding Leavenworth, and wildfire exposure among the highest in the state, this development is not merely unsustainable—it is a liability to Chelan County.

To approve it in its current form would expose the County to litigation, violate state planning and environmental laws, and endanger human life. The responsible course is clear: Reject or require complete revision of the DEIS before any further action on the proposed project.

Respectfully submitted,

Christopher J. Carter

Christopher "C.J." Carter, AICP, MSc.P

(Pronouns: He/Him/His)

President, Regional Planner & Filmmaker / Nunatag Inc.



From: Shannon Claeson

To: <u>missionridgeeis@outlook.com</u>

Subject: comments to Mission Ridge Expansion draft EIS

Date: Monday, October 20, 2025 9:13:19 PM

October 20, 2025

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

RE: Mission Ridge Expansion Master Planned Resort Draft EIS

Dear Mr. Kaputa,

I work in the field of natural resources and understand that land management means balancing user, resource, and ecological needs. I am also familiar with the writing of EA and EIS documents which include multiple (3 or more) alternative actions. This DEIS has only the Proposed Project and the No Action Alternative. The proposed development violates Chelan County Codes and the requirements of a Master Planned Resort. The DEIS omits and incorrectly dismisses economic and recreation impacts to the Wenatchee Valley community, ecological impacts to wildlife, and groundwater impacts. Because of these many reasons, I oppose the development and urge you to choose the No Action Alternative.

Recreation Impacts: This section of the DEIS is full of persuasive language that I, as an active recreationalist in the area, believe to be woefully false and misleading (specific sections noted below). This DEIS should be revised to provide an honest assessment of the impacts to recreation access, quality and amenities by specific user groups due to construction activities and development operation.

4.4.3.2, 5.10.3.1 The DEIS claims "The proposed project would likely make it easier for recreationists to access surrounding public lands." This is NOT true! The Lake Clara trail is one of the most popular in the lower Valley and the development will eliminate the trailhead parking area. The DEIS suggests that parking 1 mile away at the remote development is an acceptable alternative. This is NOT acceptable. Adding another mile just to access the trailhead would nearly double the total length as the trail to Lake Clara is only 1.5 miles in length. Access to the newly established winter non-motorized area in the upper Stemilt basin by skiers and snowshoers will be blocked by a new chairlift and the Special Use Permit (SUP) area expansion. Plus, extending the boundaries of the SUP area will effectively eliminate access to public lands because Mission Ridge Ski Resort already limits or denies access/travel on public lands within their SUP area.

5.10.3.1 Regarding the quality of recreation amenities due to construction, the DEIS states that "Because the changes in quality would be transitory and most visitors appear willing to substitute to other locations, recreation impacts would be minor." The transitory impacts are scheduled to last for 20 years, and what data suggests that locals are happy to go elsewhere? 20 years is an entire generation of Wenatchee Valley children who would grow

up avoiding the Mission Ridge Area. This level of impact is not acceptable.

- 5.10.3.2 Regarding the availability of and access to recreation amenities, the DEIS wrongly concludes that the development's impact is minor. A small user group of lift access skiers and wealthy development residents will benefit from the recreation environment of the project. However, local skiers will be negatively impacted by new crowding on the hill and in lift lines, increased traffic to access the resort, and recreation amenities in surrounding areas will be degraded for all other user groups.
- 5.10.3.2 Regarding access to existing recreation areas, the DEIS does not discuss impacts to nearby Squilchuck State Park, Mission Peak, Devils Gulch, or Beehive Reservoir. This is a gross omission as access to these areas is from the Squilchuck & Mission Ridge Road corridor which has already been noted to have impacts from construction and increased traffic.
- 5.10.3.2 Regarding quality of recreation amenities, the DEIS misrepresents the ski area expansion. The new ski lift chairs will service only low elevation runs above the development and do not provide meaningful ski area expansion. The future condition with the development includes roughly 2000 more skiers than now, with zero uphill capacity improvements in the ski area. This means that congestion on the runs and in parking areas will increase and lift lines will be longer. More crowding on the same lifts in the ski area does not improve the recreational experience.
- 5.10.4 Regarding significant and unavoidable adverse impacts to recreation, the DEIS claims there are no impacts on recreation from operation, and only minor impacts during construction which don't count because they are temporary and localized. Several direct and indirect adverse impacts from operation have been identified including crowding at the ski area, displacement or degraded experience of dispersed recreationalists including backcountry skiers, snowshoers, campers, bird watchers, hikers, trail runners, hunters, anglers, and horsemen. Impacts include the loss of Mission Ridge Road availability for road bikers, dog walkers, and roller ski athletes. In addition, it is not accurate to downplay impacts from construction simply because they are temporary and localized. Temporary means 20 years for this project, and localized refers to the entire Squilchuck & Mission Ridge Road corridor, Squilchuck State Park, the Lake Clara basin, and the upper Stemilt basin. The Wenatchee valley enjoys unique access to the Wenatchee Mountains via a paved road all the way to the base of the mountains. Most communities do not have this amazing and easy access to alpine environments. This project affects access to the Wenatchee Mountains for every visitor using the Squilchuck and Mission Ridge roads. The DEIS should be revised to acknowledge the negative impacts from construction and operation. Many of these impacts are unavoidable. If they are also found to be significant, then the DEIS should move Section 5.10 - Recreation from Chapter 5 to Chapter 4.

Economic Impacts to Chelan County: The DEIS should be revised to clarify that all new costs for service extensions and capacity increase are to be borne by the development (and not Chelan County). As is, the DEIS has numerous instances (specific sections noted below) where the developer is described as not responsible, therefore Chelan County taxpayers would end up paying for these improvements for a Master Plan Resort. In addition, the DEIS states that the proposed project will benefit Wenatchee businesses, when it will more likely reduce short-term hotel stays and visitors frequenting Wenatchee restaurants drawing tourism away from downtown Wenatchee for the benefit of the

developers.

- 2.6.1 The proposed project relies on power system improvement costs that are borne by the community and not the developer.
- 4.2.1.5 The DEIS acknowledges that a new fire station is required, but does not indicate that any basic life support or fire protection costs will be borne by the development and only offers a location for Chelan County to build a fire station (to be paid for by the County).
- 4.2.3.2 The proposed project relies on Chelan County Fire District #1 to install a fire station and staff volunteer firefighters even though CCFD#1 has communicated that it may not be able to recruit and maintain volunteers, ultimately requiring the staffing of paid firefighters.
- 5.5.4.3 The proposed project intends to use power from existing Squilchuck power lines until capacity is maxed, while the DEIS has no schedule for PUD power improvements. Short term capacity improvements should be required for project phases 1 and 2. All costs associated with permitting, SEPA, design and construction of new power lines, substations and any other infrastructure associated with new capacity to power the development, must be borne by the development.
- 5.6.3.3 The DEIS suggests that traffic mitigation costs should be shared between Chelan County and the developer, yet the traffic impact analysis for 2034 baseline conditions (without the proposed project) states that no improvements are necessary. It is only with the addition of the development that conditions deteriorate and mitigation is required. Thus, all of the costs for the otherwise unnecessary intersection improvements should be borne by the developer.
- 5.7.1 The DEIS is not clear on who will pay for short-term PUD power projects or fiberoptic line extensions required with the proposed project.

Construction Phasing and Mitigation: The DEIS describes construction and operation of the proposed project in multiple phases, but public improvements to water delivery and treatment, road and traffic, and power delivery are not included until the final phases. Because the developer is under no obligation to complete future phases, these important development mitigation actions should be required in the early phases, or the project should be reduced in scope to permit and mitigate for only the first three phases.

Squilchuck and Mission Ridge Road Traffic: The project predicts 10,000 vehicle trips per day on the Mission Ridge Road, which is roughly double the traffic on both Stevens Pass and Blewitt Pass. The DEIS predicts that the development will snarl traffic to a condition below minimum Chelan County standards, yet the DEIS does not include mitigation or improvements to the Mission Ridge Road. 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...". Our community should not be burdened by snarled traffic that financially benefits a developer but hurts the rest of us.

Secondary access to the development: A second access road is required to provide an alternate escape route if needed. However, the DEIS only presents secondary access as an alternative. Secondary access is not an alternative; it is a code requirement. The DEIS recognizes that the secondary access would make a safer situation, stating in section

4.2.1.6 that: "Having more than one evacuation route provides redundancy and increased safety, particularly during unexpected or fast-moving events." Yet, the developer argues that providing a single "wider" 28-foot access road will make up for the danger of not having an emergency exit. This offering of a single "wider" road is misleading. The current Mission Ridge Road is 28 feet wide and is not adequate for the proposed development's traffic. The proposed "wider" road is the same width as the existing road and won't even meet minimum County standards. Chelan County should not bend its rules on secondary access to benefit a developer at the jeopardy of the safety of residents and visitors of the development he wants to build.

WDFW Land Exchange: Section 25 is owned by the Washington State Department of Fish and Wildlife and encompasses Windy Ridge and Bowl 4, the upper half of Chair 4, and overlaps with the proposed project. Per the DEIS, WDFW said: "...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." Hunters use the section during archery and rifle seasons as well as for forest grouse hunting. Mule deer, Colockum Elk, golden eagles, goshawks, pika, marmots, bobcats, mountain lions, coyotes, and black bears regularly use the section's wildlife corridors. Section 25's whitebark pine forests, springs and wetlands, talus slopes, and undisturbed shrub-steppe openings are vital wildlife habitats. This section grows more important as development threatens to destroy similar habitats on adjacent parcels. The DEIS discusses a land exchange between WDFW and Washington State DNR that would result in DNR owning Section 25 and implying that an expanded year-round resort would be allowable on DNR-owned Section 25. However, the DEIS further states that: "The land swap is not part of the current Proposed Project...". With the land exchange not on the table, the likelihood that it is illegal for DFW to swap the land, and DFW indicating that expanded year-round activity is not an allowable use of Section 25, Section 25 should be excluded from any expanded ski resort or development activity.

Master Planned Resort Overlay: Without the Master Planned Resort Overlay (MPR), the proposed level of development would violate the Urban Growth Act and not be allowed. The developer is depending on this land use strategy which allows dense urban-style development outside the urban growth boundary. Despite depending on this planning tool, the development violates the requirements of MPRs including: impacts are not fully mitigated, costs of public services are not fully borne by the developer, the development is not primarily a destination resort, is not self-contained, does not consist of short-term visitor accommodations, does not consider affordable employee housing, and does not preserve the rural character or natural resource it uses. Since the proposal does not meet the requirements for an MPR, the development should not benefit from the housing density allowed by an MPR.

These are just some of the major sections of the DEIS that are unclear, misleading, incomplete, or false. I strongly encourage Chelan County to stick to established codes and not bend the rules for the benefit of a developer. Since the development significantly breaks County Codes, I urge you to select the <u>No-Action Alternative</u>, which is the only alternative besides the full Proposed Project Alternative presented in the DEIS.

Thank you for considering my comments.

Shannon Claeson 1429 Appleridge St. Wenatchee WA 98801 shannon@collbett.org

From: Molly Jennings

To: <u>missionridgeeis@outlook.com</u>

Subject: Draft Environmental Impact Statement Concerns

Date: Monday, October 20, 2025 8:58:32 PM

Dear Mr. Kaputa and Chelan County Planning Staff,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the proposed Tamarack Saddle development adjacent to Mission Ridge Ski Area. After reviewing parts of the DEIS, I believe the document inadequate in its analysis, incomplete in its assessment of significant environmental and community impacts, and inconsistent with Chelan County Code. I urge the County to reject the proposed development and select the No Action Alternative.

Below are several key areas of concern that illustrate major flaws in the DEIS:

Traffic on Squilchuck and Mission Ridge Roads

The DEIS predicts roughly 10,000 daily vehicle trips, doubling current traffic volumes on Stevens and Blewett Pass, and leading to unacceptable congestion below the County's minimum Level of Service standards. Despite acknowledging these impacts, the DEIS fails to identify or require mitigation. The Chelan County Comprehensive Plan Goal 1.9 clearly states: "Deny approval of any development proposal that would cause a roadway segment to fall below the adopted minimum level of service." Allowing this project to proceed without road improvements would burden local residents with unsafe, congested roads while benefiting a single developer.

Secondary Access Requirement

Chelan County Code and the International Fire Code require two access routes for developments of this scale to ensure safe evacuation during emergencies. The DEIS misleadingly treats secondary access as an "alternative" rather than a mandatory requirement. Even the DEIS itself acknowledges that "having more than one evacuation route provides redundancy and increased safety." We just had two fires threaten our community this fall, and it's not a question about if but of when mission ridge will burn. It is irresponsible and dangerous to allow a village of 4,000 people to be built with only one egress. A single 28-foot-wide access road does not meet County design standards, nor does it provide the redundancy needed for public safety. The County should enforce existing code and require secondary access before any permits are issued.

WDFW Land Exchange (Section 25)

Section 25—home to Windy Ridge, Bowl 4, and significant wildlife habitat—is owned by the Washington Department of Fish and Wildlife (WDFW) and funded through the U.S. Fish

and Wildlife Service. WDFW has stated that "an expanded, year-round ski resort is not an allowable use of this land." The DEIS improperly includes this section in the proposed project despite acknowledging that a land exchange with DNR is speculative and not part of the current proposal. Section 25 supports vital wildlife species and should be excluded from all development and ski area expansion plans.

Master Planned Resort (MPR) Overlay Violations

The developer seeks to use the MPR Overlay to justify dense, urban-style development outside the urban growth boundary. However, the proposal fails to meet fundamental MPR criteria. The project:

- Does not mitigate impacts or bear full public service costs;
- Is not self-contained or primarily a destination resort;
- Lacks adequate short-term visitor accommodations and employee housing; and
- Does not preserve rural character or the natural resources it relies on.

Since the project does not meet MPR requirements, it should not benefit from MPR-level housing density or entitlements.

Public Services, Water & Infrastructure

The DEIS does not satisfactorily show that the project can be served by water, sewer, roads, fire protection or community infrastructure without undue burden to existing residents or public agencies. Financing for infrastructure upgrades is vague, and the assumption that public agencies will pick up residual costs is inconsistent with the County's "front-end cost" principle. Given the steep terrain, seasonal limitations, and remote access constraints, the risks to service delivery are real and under-analyzed.

Cumulative Impacts and Watershed Risk

Beyond the specific items above, the DEIS does not adequately assess cumulative impacts — particularly on the Squilchuck Creek watershed, Stemilt Basin, and associated shrubsteppe and forest ecosystems. The region is already facing pressures from wildfire risk, climate change, water supply uncertainty, and recreation demand. Introducing a large-scale resort development without full accounting of cumulative effects undermines the resiliency of the region's ecosystems and infrastructure.

The DEIS also understates the potential for upland runoff, erosion, habitat fragmentation, and wildlife-human conflicts. It lacks clarity on how the development would adapt to increasing wildfire hazard, climate-driven droughts, or changes in seasonal snowpack.

These examples represent only a fraction of the omissions, inaccuracies, and misleading claims within the DEIS. The project, as proposed, would degrade natural habitats, compromise public safety, violate County codes, and undermine long-term community values.

I strongly urge Chelan County to uphold existing land use and safety standards, reject the proposed MPR Overlay, and **support the No Action Alternative**.

Thank you for considering these comments and for your commitment to protecting the public interest and the integrity of the Squilchuck and Stemilt watersheds.

Sincerely,

Molly Jennings 806 Orondo Ave Wenatchee, WA 98801 molly.ruth.j@gmail.com From: Sean Koester

To: <u>missionridgeeis@outlook.com</u>

Subject: Public Comment on DEIS for Mission Ridge Expansion

Date: Monday, October 20, 2025 8:35:37 PM

Dear Chelan County Planning Staff and SEPA Responsible Official,

As a local resident and recreationalist I am very familiar with the area in question, and the risks associated with increased development there. And while there are a myriad of issues I have become aware of with the current proposal, I have listed some of my concerns here. I am not against the development of private lands. However, I do not believe it is acceptable for a developer to move forward without clear, complete plans for health and safety. The risk of wildfires in this region is real, and it is the developer's responsibility to plan for that risk. Just as a school must have evacuation plans and fire protection systems in place, so too should the developer. I also believe the costs of private development should not fall on local residents or public utilities. The developer should bear all costs for services such as power, water, sewer, fire protection, and any other infrastructure the project requires.

Unfortunately, the Draft Environmental Impact Statement (DEIS) for the Mission Ridge expansion does not meet these expectations. It downplays the fire danger posed by having only a single access road, even referring to a blocked evacuation route during wildfire as an "inconvenience." That is unacceptable. A blocked road in a fast-moving fire could lead to fatalities, and it is misleading to suggest that on-site emergency services would make up for this. The DEIS also claims that the Mission Ridge parking lot might serve as a shelter-in-place zone, without providing any real analysis. This is a serious life safety issue that cannot be overlooked.

On top of that, the DEIS fails to clearly assign infrastructure costs to the developer. It references power system upgrades, new fire protection infrastructure, and future fuels reduction treatments, but gives no clear assurance that the developer will pay for them. These should not be public responsibilities. All necessary improvements should be installed or bonded before any occupancy is allowed. The DEIS also improperly leaves out the required review of new transmission line construction, even though this is essential to the project. That omission violates SEPA rules on phased review and must be corrected.

Given these concerns, I urge you to select the No Action Alternative.

I request that you please reply to this email so that I know this has been received.

-Sean Koester

From: Adam Vognild

To: <u>missionridgeeis@outlook.com</u>

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

Date: Monday, October 20, 2025 7:29:47 PM

October, 20 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 full of omissions of impacts, inadequate mitigation of the potential effects, and incorrect assertions. Additionally, the proposed development violates Chelan County Codes. Because of this, I oppose the development and urge you to support the <u>No Action Alternative</u>.

Below, I highlight a small sample of the many issues in the DEIS:

Traffic on Squilchuck and Mission Ridge Road: The project predicts 10,000 vehicle trips per day on the Mission Ridge Road, which is roughly double the traffic on both Stevens Pass and Blewitt Pass. The DEIS predicts that the development will snarl traffic to a condition below minimum Chelan County standards, yet the DEIS does not include mitigation or improvements to the Mission Ridge Road.

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...". Our community should not be burdened by snarled traffic that financially benefits a developer but hurts the rest of us.

Additionally, the impacts on the wildlife of this massive increase in traffic, from Mission Ridge all the way to the south end of town, have not been addressed. If the master plan is completed as planned, there will be 20 years of heavy construction vehicles traveling up and down the road. This isn't just light vehicle traffic, but large and heavy trucks and

semi's. These trucks will primarily utilize diesel fuel, which will impact the surrounding wildlife and residents of Chelan County.

The DEIS States:

5.6.3.1 Direct Impacts from Construction

City of Wenatchee, Squilchuck Road Corridor, Chelan PUD Easements: Construction of the Proposed Project would require worker, equipment, and materials trips to and from construction sites. Construction sites would include all areas where construction related to the Proposed Project would occur. This would include intersections with necessary improvements in the City of Wenatchee, PUD utility infrastructure improvements along existing or expanded easements, construction of the new access road, and construction within the Project Area during each phase of Proposed Project.

Construction-related traffic was not evaluated in the TIA; however, it is reasonable to expect that construction traffic would result in temporary increases in traffic interference and congestion on local roads throughout periods of construction. Construction would likely occur during off-season months, not to conflict with the higher uses of the area roadways during the ski season. Due to the limited roadway options in the area, only short-term and partial roadway

closures will be allowed except where detour routes are available.

Additionally, the impacts on the wildlife of this massive increase in traffic, from Mission Ridge all the way to the south end of town, have not been addressed. If the master plan is completed as planned, there will be 20 years of heavy construction vehicles traveling up and down the road. This isn't just light vehicle traffic, but large and heavy trucks and semi's. These trucks will primarily utilize diesel fuel, which will impact the surrounding wildlife and residents of Chelan County.

The current roads, as built, could not handle this increase in traffic, both in the short term (20 years) during build-out and if completed to plan in 20 years. This will lead to massive traffic congestion and an increase in exhaust (due to idling vehicles while waiting for an underdesigned traffic system). This will both impact wildlife and residents of Chelan County and Douglas County, as the south end bridge (George Sellar) and the surrounding area will be completely overwhelmed with this traffic increase.

The DEIS States:

4.3.4 Significant and Unavoidable Adverse Impacts

While construction of the Proposed Project poses impacts to visual resources, these impacts will

be temporary in nature and can be mitigated through best practices to reduce light and glare. On the other hand, the impacts to visual resources from operation of the Proposed Project will be significant and unavoidable as the changes are integral to the project nature. The aesthetics of the Mission Ridge ski area will change with additional development for a residential resort

area and year-round activities. Additionally, more light sources will be added to the area from residential light for the proposed development, recreational light during the nighttime for night ski operations, and glare during the daytime given the additional structures and snow across the mountain. Mitigation measures are proposed to reduce the impacts but cannot fully offset the intent of this project, which is to develop residential areas and expand existing ski operations which will alter the visual quality.

The year around impacts of the residential development lighting have not been fully taken into account for both the impact on wildlife and the light pollution in the valley. Renderings and estimates have been made for the expanded night skiing and how it will impact the valley, but none of these "estimated renderings" included the residential and subsequent needs for parking and other nighttime operations. This constant year around visual impact has been misrepresented in the DEIS. It needs to be accurately represented, and then studied further to understand the negative impact it will have on the wildlife.

These are just a few of the unclear, misleading, untrue, incomplete, arbitrary, and persuasive statements in the DEIS. I strongly encourage Chelan County to stick to established codes and not bend the rules for the benefit of a developer. Since the development breaks County Codes, I urge you to select the <u>No-Action Alternative</u>, which is the only alternative besides the full development build-out that is presented in the DEIS.

Please send an email so that I know you received these comments.

Thank you for considering my comments.

Adam Vognild 1304 5th Street NE East Wenatchee, WA 98802 509-669-0409 From: Becky Cate

To: <u>missionridgeeis@outlook.com</u>

Cc: Becky Cate

Subject: Comments RE: DEIS proposed development Mission Ridge ski area

Date: Monday, October 20, 2025 4:23:04 PM

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 full of omissions of impacts, inadequate mitigation of potential impacts, and incorrect assertions. Additionally, the proposed development violates Chelan County Codes. Because of this, I oppose the development and urge you to support the No Action Alternative. Below I highlight a small sample of the many issues in the DEIS:

Traffic on Squilchuck and Mission Ridge Road: The project predicts 10,000 vehicle trips per day on the Mission Ridge Road, which is roughly double the traffic on both Stevens Pass and Blewitt Pass. The DEIS predicts that the development will snarl traffic to a condition below minimum Chelan County standards, yet the DEIS does not include mitigation or improvements to the Mission Ridge Road. 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...". Our community should not be burdened by snarled traffic that financially benefits a developer but hurts the rest of us.

Secondary access to the development: A second access road is required to provide an alternate escape route if needed. However, the DEIS only presents secondary access as an alternative. Secondary access is not an alternative; it is a code requirement. The DEIS recognizes that the secondary access would make a safer situation, stating in section 4.2.1.6 that: "Having more than one evacuation route provides redundancy and increased safety, particularly during unexpected or fast-moving events." Yet, the developer argues that providing a single "wider" 28-foot access road will make up for the danger of not having an emergency exit. This offering of a single "wider" road is misleading. The current Mission Ridge Road is 28 feet wide and is not adequate for the proposed development's traffic. The proposed "wider" road is the same width as the existing road and won't even meet minimum County standards. Chelan County should not bend its rules on secondary access to

benefit a developer at the jeopardy of the safety of residents and visitors of the development he wants to build.

WDFW Land Exchange: Section 25 is owned by the Washington State Department of Fish and Wildlife and encompasses Windy Ridge and Bowl 4, the upper half of Chair 4, and overlaps with the proposed project. Per the DEIS, WDFW said: "...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." Hunters use the section during archery and rifle seasons as well as for forest grouse hunting. Mule deer, Colockum Elk, golden eagles, goshawks, pika, marmots, bobcats, mountain lions, coyotes, and black bears regularly use the section's wildlife corridors. Section 25's whitebark pine forests, springs and wetlands, talus slopes, and undisturbed shrub-steppe openings are vital wildlife habitats. This section grows more important as development threatens to destroy similar habitats on adjacent parcels. The DEIS discusses a land exchange between WDFW and Washington State DNR that would result in DNR owning Section 25 and implying that an expanded year-round resort would be allowable on DNR-owned Section 25. However, the DEIS further states that: "The land swap is not part of the current Proposed Project...". With the land exchange not on the table, the likelihood that it is illegal for DFW to swap the land, and DFW indicating that expanded year-round activity is not an allowable use of Section 25, Section 25 should be excluded from any expanded ski resort or development activity.

Master Planned Resort Overlay: Without the Master Planned Resort Overlay (MPR), the proposed level of development would violate the Urban Growth Act and could not be allowed. The developer is depending on this land use strategy which allows dense urban-style development outside the urban growth boundary. Despite depending on this planning tool, the development violates the requirements of MPRs including: Impacts are not fully mitigated, costs of public services are not fully borne by the developer, the development is not primarily a destination resort, is not self-contained, does not consist of short-term visitor accommodations, does not consider affordable employee housing, and does not preserve the rural character or natural resource it uses. Since the proposal does not meet the requirements for an MPR, the development should not benefit from the housing density allowed by an MPR.

These are just a few of the unclear, misleading, untrue, incomplete, arbitrary, and persuasive statements in the DEIS. I strongly encourage Chelan County to stick to established codes and not bend the rules for the benefit of a developer. Since the development breaks County Codes, I urge you to select the No-Action Alternative, which is the only alternative besides the full development build-out that is presented in the DEIS.

Thank you for considering my comments.

Becky Cate East Wenatchee

Get Outlook for Android

From: Chelsea Short-Morin
To: missionridgeeis@outlook.com

Subject: Mission Ridge DEIS Comment - Support for No Action Alternative

Date: Monday, October 20, 2025 4:18:29 PM

Attachments: Mission Ridge DEIS Comments NoAction Chelsea Short Morin.pdf

October 20, 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 comment on the Draft Environmental Impact Statement (DEIS) for the proposed Mission Ridge Master Planned Resort (MPR) Expansion. I am writing as a lifelong resident of Wenatchee and someone who grew up skiing at Mission Ridge. I strongly oppose this proposal and urge Chelan County to support the No Action Alternative.

The DEIS contains substantial omissions, misleading conclusions, and inadequate mitigation measures. It fails to meet SEPA's requirement for a complete and scientifically defensible analysis and is inconsistent with Chelan County's Comprehensive Plan, fire and safety codes, and MPR criteria. These issues cannot be corrected through further modification—the only appropriate course of action is for Chelan County to select the No Action Alternative and preserve the land, wildlife, and community character that make the Squilchuck and Mission Ridge area irreplaceable.

1. Traffic and Infrastructure Impacts

The DEIS predicts up to 10,000 vehicle trips per day on Mission Ridge Road—roughly double the combined volumes of Stevens Pass and Blewett Pass. This would degrade road performance to a level below the County's adopted minimum Level of Service (LOS) standards.

Chelan County Comprehensive Plan Goal 1.9 requires denial of any development that

causes a roadway segment to fall below LOS standards.

The DEIS acknowledges degraded LOS but does not propose required mitigation.

Multiple intersections (Pitcher Canyon, Wenatchee Heights, Kray Ike, Saddlehorn, Halverson Canyon, and others) were excluded from analysis.

The Traffic Impact Analysis also relies on faulty Highway Capacity Manual (HCM) assumptions, using "base condition" values that allow passing—conditions that do not exist on the steep, narrow Mission Ridge Road. The analysis must be recalculated using HCM Equation 15-9 for no-passing conditions.

Without mitigation, Squilchuck Road and Mission Ridge Road will experience traffic volumes similar to urban arterials. This violates Comprehensive Plan Goals 1.8 and 1.9, which require preservation of the rural character of County roads.

2. Secondary Access and Life Safety

Secondary access is not optional; it is a code requirement for developments generating more than 400 average daily trips under Chelan County Code 15.30.230(4). The DEIS improperly treats a second access route as an "alternative" when it is mandatory for life safety.

The single 28-foot "wider" road is inadequate, both in width and redundancy. Section 4.2.1.6 of the DEIS itself admits that "Having more than one evacuation route provides redundancy and increased safety." To claim that a single route can "serve the same function" is misleading and unsafe.

Further, the DEIS proposes a "shelter-in-place" strategy without confirming whether the designated safe zones (including the Mission Ridge parking lot) meet National Wildfire Coordinating Group (NWCG) or NIST standards. Independent fire analysis shows that the lot's size and slope render it insufficient for even one vehicle and three people during a fast-moving wildfire.

Chelan County must require a second operational egress road before occupancy, per CCC 11.89.040(8), and conduct a full wildfire evacuation modeling study to assess risk to life safety.

3. Fire Risk and Emergency Services

The DEIS systematically downplays wildfire hazards:

It assumes "moderate" risk of wildfire from the north despite mapping the area as "High to Very High" Wildfire Hazard Potential.

It relies on future fuel treatments that are not enforceable permit conditions.

It ignores the region's worsening beetle-kill conditions, which drastically increase ignition and spread potential.

The DEIS also proposes that Chelan County build a new fire station "at the discretion of the fire district," using County funds. This contradicts CCC 11.89.040(10), which requires that all service capacity increases be paid for by the developer. Chelan County Fire District #1's 2020 comment letter states the District lacks capacity to serve the project without new apparatus and facilities.

All fire and basic life support infrastructure must be developer-funded, constructed, and operational prior to occupancy to comply with County code.

4. Water Quantity, Quality, and Legal Rights

The project would withdraw up to 240 acre-feet per year of groundwater from the Squilchuck Basin before connecting to the PUD water system. This will directly impact baseflow in Squilchuck Creek and reduce supply to downstream senior water rights holders, who already face 50–75% curtailments most years.

The DEIS claims "no impairment" to existing rights based on "authorized but unused" quantities. This is a legal misinterpretation—unused portions of water rights are not vested and cannot justify new withdrawals under state law.

The wastewater proposal compounds the risk. The DEIS provides no soil suitability analysis for drainfields and relies on a speculative wastewater treatment plant (WWTP) that "may be feasible with new technology." This is inadequate under WAC 173-240-060, which requires completed engineering reports before project approval.

The DEIS must be revised to include verified hydrological modeling, groundwater drawdown impacts, WWTP feasibility studies, and acknowledgment that pharmaceuticals and PFAS in domestic effluent will contaminate Squilchuck Creek.

5. WDFW Land (Section 25) and Wildlife Habitat

Section 25, owned by the Washington Department of Fish and Wildlife, includes critical habitats: elk and mule deer corridors, pika talus fields, wetlands, and whitebark pine stands. WDFW has explicitly stated that year-round resort use is not an allowable use

under its federal acquisition contract.

The DEIS misleadingly references a speculative land swap with DNR, even though it admits the exchange "is not part of the current proposal." This is a fundamental misrepresentation that invalidates the inclusion of Section 25 in the analysis.

Trail camera evidence and WDFW observations document active use by elk, deer, golden eagles, and goshawks. Destruction of these habitats would violate CCC 11.78 (Fish and Wildlife Habitat Conservation Areas), which requires avoidance and mitigation of impacts prior to land use approval.

Section 25 must be removed from the project scope in any revised EIS.

6. Master Planned Resort Overlay Violations

The project fails nearly every requirement of the Master Planned Resort (MPR) overlay under CCC Chapter 11.89:

- It is not self-contained and depends on Wenatchee for schools, utilities, and emergency response.
- It does not consist primarily of short-term accommodations; 265 single-family and 621 multi-family units are residential.
- It lacks affordable employee housing.
- It fails to preserve rural character, environmental integrity, or the natural resource it uses.

Without MPR approval, this density violates the Washington State Urban Growth Act (RCW 36.70A). Granting MPR status under these conditions would set a precedent for unchecked urban sprawl into resource lands.

7. Visual, Light, and Noise Impacts

The DEIS mischaracterizes construction and operational lighting as "temporary" despite a 20-year build-out schedule. The lighting inventory is incomplete and fails to address impacts on dark skies, migratory birds, and the Manastash Ridge Observatory.

Proposed night operations would increase visible skyglow valley-wide, violating the intent of CCC 11.88.080 and diminishing the region's rural and natural aesthetic.

Noise impacts are similarly understated. The DEIS incorrectly claims the nearest homes

(Forest Ridge) are "3 miles away"; in reality, they are 0.4 miles. Using this false distance, the analysis underestimates sound levels by roughly 25 dBA. Construction and traffic noise during a 20-year "temporary" period will permanently alter the soundscape of the valley.

8. Recreation, Access, and Public Use

The DEIS claims the project will "enhance recreational opportunities," yet it reduces public access to the Lake Clara Trailhead, eliminates existing trail parking, and extends private resort boundaries across public land used by backcountry skiers, snowshoers, and hunters.

Crowding from 100,000 new skier visits per year and a population of 4,000 residents will degrade the very experience that attracts visitors to Mission Ridge. Recreation displacement is not a "minor" impact; it is significant and irreversible.

9. Community, Culture, and Character

Beyond the technical and legal violations, this proposal threatens the cultural heart of the Wenatchee Valley. Mission Ridge has always been our hometown hill—a place of community connection, not commercialization.

I grew up skiing here. It's where families gather on winter mornings, where friends reconnect on the chairlift, and where every run feels special and rooted in our shared sense of place. To replace that with a sprawling luxury resort—parking for 5,500, 7,812 beds, and 4,000 year-round residents—would erase what makes Mission Ridge meaningful.

The DEIS dismisses these social and cultural impacts, but SEPA requires their consideration under WAC 197-11-444(2)(b).

10. Conclusion and Requested Actions

The DEIS is incomplete, inconsistent, and in multiple sections misleading or legally deficient. It fails SEPA standards for full disclosure and fails Chelan County Code requirements for transportation, safety, utilities, and land use.

I respectfully request that Chelan County:

- Reject the Mission Ridge MPR proposal in its entirety;
- Recognize that this development's scale and location are incompatible with the

character and safety of the community; and

• Select the No Action Alternative to preserve the rural character, safety, and ecological integrity of the Squilchuck and Mission Ridge area.

Thank you for your attention and for upholding the integrity of Chelan County's codes, community values, and environmental stewardship.

Sincerely,
Chelsea Short Morin
200 Jennings St
Wenatchee, WA 98801
c.shortmorin@gmail.com
509-630-0535

From: <u>Candace</u>

To: <u>missionridgeeis@outlook.com</u>

Subject: MPR DEIS

Date: Monday, October 20, 2025 3:52:56 PM

I am STRONGLY OPPOSED to the Mission Ridge Expansion as set out in the MPR DEIS recently released. My reasons are totally in line with the friendsofmissionridge.org website. We, as a county, let alone an extension of the greater Wenatchee area, simply CANNOT absorb the additional crush of a development of anywhere near this size impacting the current residents and infrastructure. We can't afford it; there is not enough capacity for the hugely increased traffic; we don't even have the employees have available to work in our CURRENT businesses without providing them more affordable housing and reasonable living wages! I'm sorry, but this unbridled "get rich quick" attitude by a very few, at the expense of every one else has to stop! I am sincerely asking you, and praying for you to be the people to bring sanity and compassionate reason to our area in this regard. For the first time in a very long time, be the ones to stand up and truly represent the vast majority of your fellow citizens, and JUST SAY NO! If that is not within you, then at least be FAIR and put this entire project to a vote of the registered voting public, hopefully, without allowing the unfair influence of the large amounts of cash available from developers pockets to sway the unsuspecting or not as well informed of us. Do you want your families to have to foot the bill for this expansion, without their gaining benefit just so a tiny fraction of developers can get richer? I certainly do not and I seriously doubt that whatever economic benefits you personally may gain will not be shared by your entire family and friends. Please vote your conscience. Thank you for your consideration in this matter.

Candace Egner candace@37cellars.com 509-679-6609

From: <u>Francis Dechaine</u>

To: <u>missionridgeeis@outlook.com</u>

Subject: Mission ridge eis

Date: Monday, October 20, 2025 2:23:36 PM

October 20, 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 full of omissions of impacts, inadequate mitigation of potential impacts, and incorrect assertions. Additionally, the proposed development violates Chelan County Codes. Because of this, I oppose the development and urge you to support the No Action Alternative. Below I highlight a small sample of the many issues in the DEIS:

Traffic on Squilchuck and Mission Ridge Road: The project predicts 10,000 vehicle trips per day on the Mission Ridge Road, which is roughly double the traffic on both Stevens Pass and Blewitt Pass. The DEIS predicts that the development will snarl traffic to a condition below minimum Chelan County standards, yet the DEIS does not include mitigation or improvements to the Mission Ridge Road. 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...". Our community should not be burdened by snarled traffic that financially benefits a developer but hurts the rest of us.

Secondary access to the development: A second access road is required to provide an alternate escape route if needed. However, the DEIS only presents secondary access as an alternative. Secondary access is not an alternative; it is a code requirement. The DEIS recognizes that the secondary access would make a safer situation, stating in section 4.2.1.6 that: "Having more than one evacuation route provides redundancy and increased safety, particularly during unexpected or fast-moving events." Yet, the developer argues that providing a single "wider" 28-foot access road will make up for the danger of not having an emergency exit. This offering of a single "wider" road is misleading. The current Mission Ridge Road is 28 feet wide and is not adequate for the proposed development's traffic. The proposed "wider" road is the same width as the existing road and won't even meet minimum County standards. Chelan County should not bend its rules on secondary access to benefit a developer at the jeopardy of the safety of residents and visitors of the development he wants to build.

WDFW Land Exchange: Section 25 is owned by the Washington State Department of Fish and Wildlife and encompasses Windy Ridge and Bowl 4, the upper half of Chair 4, and overlaps with the proposed project. Per the DEIS, WDFW said: "...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." Hunters use the section during archery and rifle seasons as well as for forest grouse hunting. Mule deer, Colockum Elk, golden eagles, goshawks, pika, marmots, bobcats, mountain lions, coyotes, and black bears regularly use the section's wildlife corridors. Section 25's whitebark pine forests, springs and wetlands, talus slopes, and undisturbed shrub-steppe openings are vital wildlife habitats. This section grows more important as development threatens to destroy similar habitats on adjacent parcels. The DEIS discusses a land exchange between WDFW and Washington State DNR that would result in DNR owning Section 25 and implying that an expanded year-round resort would be allowable on DNR-owned Section 25. However, the DEIS further states that: "The land swap is not part of the current Proposed Project...". With the land exchange not on the table, the likelihood that it is illegal for DFW to swap the land, and DFW indicating that expanded year-round activity is not an allowable use of Section 25, Section 25 should be excluded from any expanded ski resort or development activity.

Master Planned Resort Overlay: Without the Master Planned Resort Overlay (MPR), the proposed level of development would violate the Urban Growth Act and could not be allowed. The developer is depending on this land use strategy which allows dense urban-style development outside the urban growth boundary. Despite depending on this planning tool, the development violates the requirements of MPRs including: Impacts are not fully mitigated, costs of public services are not fully borne by the developer, the development is not primarily a destination resort, is not self-contained, does not consist of short-term visitor accommodations, does not consider affordable employee housing, and does not preserve the rural character or natural resource it uses. Since the proposal does not meet the requirements for an MPR, the development should not benefit from the housing density allowed by an MPR.

These are just a few of the unclear, misleading, untrue, incomplete, arbitrary, and persuasive statements in the DEIS. I strongly encourage Chelan County to stick to established codes and not bend the rules for the benefit of a developer. Since the development breaks County Codes, I urge you to select the No-Action Alternative, which is the only alternative besides the full development build-out that is presented in the DEIS.

Thank you for considering my comments.

Frank Dechaine 1541 Holly Ln East Wenatchee, Wa., 98802

Sent from my iPad

From: Paul Ballinger

To: <u>missionridgeeis@outlook.com</u>

Subject: Proposed Mission Ridge expansion/development plan proposal

Date: Monday, October 20, 2025 2:03:26 PM

Dear Mike and County Commissioners and Hearings Examiner.

I have lived in the Wenatchee valley since 1993. I have skied at Mission Ridge for many of the years since, and my three now adult kids learned to alpine ski at the ridge. It has been a boon to our local economy, and has helped us recruit new physicians, and other healthcare providers to our area. Now, there are proposed changes that will wreck the Ridge, and be a major expense to the County, as well as cause a permanent loss the the beauty and charm of a natural wonder.

I am writing regarding the proposed Mission Ridge expansion/development plan proposal.

As you know, there are major issues and concerns regarding the proposed development, including:

A. Much of the stated information regarding wildlife in the area is incomplete or false, and subsequently minimizes the significant effect on Pika, Elk, Cougar, and Hawks and Eagles. As climate change is playing a role in our seasonal snowfall, temperatures, and seasonal timing, any development in higher areas will see increased summer use, and this will absolutely affect wildlife in the area.

- B. The tremendous increase in traffic (10,000 cars a day) on Squilchuck and Mission Ridge roads violates the minimum standards required by Chelan County and the state.
- C. There is no listed plan for a secondary access road to allow an alternative emergency route in the setting of a major event, such as wildfire or traffic accident blocking the road.
- D. The massive proposed development (over 7000 beds) lies outside the urban growth boundary and is therefore unacceptable and illegal at this time.
- E. The WDFW land exchange involved in the proposed area does not allow for an expanded year-round ski resort.
- F. The area of development has an extremely high wildfire risk, and there have been no significant plans to address this.
- G. 100,000 additional annual skier visits, with only a minimal increase in ski acreage will ultimately take away quality skiing from past resort users.

These issues all need to be addressed with acceptable plans before any further action can be taken.

Therefore, I request the No Action Alternative regarding this.

Sincerely, Paul Ballinger, MD 509 669 6384

From: <u>Kurt Komarnitsky</u>

To: <u>missionridgeeis@outlook.com</u>

Subject: Mission Ridge DEIS

Date: Monday, October 20, 2025 1:59:51 PM

I have many concerns with this expansion and feel that the Mission Ridge DEIS is very heavily optimistic and not rooted in reality as to the effects a project this size will have on traffic and the environment.

Traffic - I live in Squilchuck Canyon in Forest ridge and that road is not even capable of handling this increased traffic. It is dangerous right now even trying to come out of our development to head up skiing or head to town with the blind corners. There are already crazy people passing people on the curving road.

Water/snow cover - Having skied Mission for 25+ years you are lucky to even ski the outback area for maybe a month or 2 at the most and then only on a good snow year. This is the area people will have to traverse to get to the resort. The amount of snowmaking to keep trails open around the development and thru the outback will be tremendous. Where are they going to get all this water? Plus chemicals are used to make fake snow so this will all leach into the ground.

Upper wheeler reservoir - This lake is a haven for wildlife and the ONLY Chelan county managed trophy trout lake. This development will sit right on top of it and ruin it with waste runoff, people etc. I see grouse, eagles, ospreys, turkeys, elk and bear all around this lake. Those animals will not stay around.

FIRES - Bad people start fires every year around Beehive and you add much increased risk with this amount of people.

SKI experience - The new proposed lifts are only to shuttle people in and out of the development to the ski hill. There is ZERO increased terrain access so our little ski hill will be overrun with people and will become a mess of jammed lift lines, food lines, Beers lines and loss of powder lines.

I agree that the owners of MR need to do something to have some increased revenue but the size and scope of this will overrun this area. This needs to be tapered down to something more manageable. The size and scope of this is way too big for this small footprint of nature's paradise to absorb.

From: Mark Oswood
To: Mike Kaputa

Subject: Mission Ridge development considerations

Date: Monday, October 20, 2025 1:49:44 PM

Dear Mike Kaputa, Chelan County NRD,

By way of introduction, I'm a retired biology professor. I was a participant in the early years of the Stemilt Partnership, representing North Central WA Audubon Society. More importantly, I live on Squilchuck Road (lower end). This makes me something of a "local" with regards to Mission Ridge development.

The proposed Mission Ridge development has consequences for wildlife, in the sense of wild life: large mammals and birds, plants from small flowers to trees, and "the small things the run the world." The footprint of the Mission Ridge development is large but raw acreage isn't the best measure. Some landscapes are "high quality" providing for shelter and sustenance, reproduction and migration. The Mission Ridge landscape is one of these especially important landscapes. Conversion to a cityscape would be an eviction for wildlife.

The proposed Mission Ridge development raises deeply concerning questions for visitors and residents, and for Chelan County governance. For much of the year, wildfires are an everpresent danger. The Mission Ridge development could be both a starting place for fires and in harm's way for encroaching fires. Access for firefighting and egress for evacuation seem, potentially, a nightmare. Squilchuck Road has substantial traffic now, perhaps more than is safe for such a winding rural road with a 50-mph speed limit. I can't imagine Squilchuck Road with a small city at Mission Ridge, absent a massive and costly road reconstruction.

The proposed Mission Ridge development has the natural allure of community development and, especially, increased tax revenues. But there is also the likelihood of consequences, some unforeseen. It would be unfortunate if such consequences proved to be a financial burden for Chelan County residents or public safety issues for both visitors and residents.

Every patch of landscape has a "best use." Building a small city is not the best use of the Mission Ridge landscape. I urge selection of the No Action Alternative for the proposed Mission Ridge development.

Regards, Mark Oswood 2390 Jeffrey Ct Wenatchee, WA 98801 From: neffa3

To: <u>missionridgeeis@outlook.com</u>

Subject: Re: Comments on the Draft Environmental Impact Statement for the Mission Ridge Master Planned Resort

Date: Monday, October 20, 2025 1:07:00 PM

Attachments: <u>image.png</u>

Dear Mr. Kaputa,

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (EIS) for the Mission Ridge (MR) Master Planned Resort. As a local user of the area and a MR season pass holder I care very deeply about this topic and this area. After reviewing the documents, I feel there are still some deficiencies, as noted below.

1. Water Rights and Legal Availability

The Draft EIS assumes that the "existing" MR water rights are sufficient for the initial stages of development, up to 90 ac-ft. however, my review of the water record indicates that there is substantially less water available.

Table 2 (below) is from MR provide water resources documentation (American Land and Water, 2022).

Table 2. Mission Ridge Water Rights and Applications

Document No.	Document Type	Name	Priority Date	Source	Qi (cfs)	Qa (ac-ft/yr)	Purpose
\$4-25295C	Certificate	Wenatchee Mountain Inc.	5/23/1977	Squilchuck Crk, Lake Crk, Unnamed Spring	0.45 cfs	11	Commercial (snowmaking)
\$4-31615P	Permit	New Mission, LLC	8/25/1993	Squilchuck Crk, Lake Crk, Unnamed Spring	1.4/0.1	348/10	Commercial (snowmaking)/ Domestic
CS4-CCVOL3P1030	Change ROE	Mission Ridge Mountain Corporation	1/8/1993	Lake Crk	0.1 cfs	2/2/23	Community Domestic/ Irrigation of 1 acre/Snowmaking
\$4-*22348J	Adjudicated Certificate	Landreth Brothers and Inland Timber Co.	1/1/1901	Stemilt Crk	70.14	•	Domestic, Stockwater
\$4-*25001JC	Change Certificate	Peshastin Forest Products Corporation	1/1/1870	Unnamed Crk Sect. 19	0.1	,	Irrigation of 5 acres
R4-31616P	Reservoir Permit	Mission Ridge Mountain Corporation	8/25/1993	Squilchuck Crk, Lake Crk, Unnamed Spring		300 ac-ft	Storage for Snowmaking
R4-33189	Application	New Mission, LLC	5/24/2017	Squilchuck Crk, Lake Crk, Unnamed Spring		300 ac-ft	Storage for Snowmaking

As shown, only 2 of the existing water rights currently allow for domestic use (Qa), S4-3165P and S4-CCVOL3P1030. The former is guided by the amended ROE based on the Finding of Fact signed May 13, 1994, which provisions the domestic use to Oct 1 – May 1 for only 10 ac-ft. The rest of the right is subject instream flow of 0.5 cfs at the Lake Creek Squilchuck confluence. Of the allowed use, per the ROE, it's already been allotted to existing skier use. The later water right is a change to an adjudicated senior right, but only grants 2 ac to community domestic. This change was protested for the same reason, MR was proposed an expansion using existing rights that were subject to instream flow rules and downstream irrigators were rightfully upset that domestic water would not be subject to the same rationing. The ROE specifically states under the Protest to the Amended Application, "By Court Decree this right must be regulated in comment with all the other Class I rights in the Squilchuck Basin." And further provides, "If this water right is regulated in the same manner

[including curtailment] as all other Class I rights, there should not be any impairment of other rights in the basin." That means even their senior snow making rights, which constitute the vast majority of their water right portfolio, are still subject to curtailment.

Interruptible or curtailable water rights cannot be used for domestic use because they can't actually be curtailed in practice (people still need to drink water and flush their toilets) and thus, any change from an interruptible (either irrigation or snow-making) to domestic is both an expansion of the rights (esp in a changing climate and the likelihood of increased curtailments) and an impairment to all existing senior irrigation rights.

Given those realities, there are only 2 ac-ft available for summer domestic use, not the 90 ac-ft claimed by MR. As such, MR must build the complete water system expansion from the PUD's system prior to authorization of any phase of the project. I also highly doubt, that 2 ac-ft currently covers their summer use, which should be evaluated as well.

2. Slope Stability and Landslide Risk

The EIS does not adequately address slope stability risks associated with increased infiltration from snowmaking, stormwater, and wastewater disposal. The 2016 GeoEngineers Report on the landslide within the existing MR area concluded that the cause was water infiltration. Yet that is exactly what MR is planning for a much larger area that is similarly prone to landslides. This arguably this nullifies the entire development, but should at least demonstrate that all development must be connected to a centralized sewer system, that all stormwater should be routed to a centralized stormwater system and disposed of appropriately, and additional snowmaking probably shouldn't be allowed, at least not in areas of talus or permeable ground.

3. Wastewater Treatment

A wastewater treatment plant must be constructed and operational prior to approval of Phase I. Allowing MR to build one or more LOSS systems to start the project is inappropriate. Not only are they difficult to operate effectively in the winter, but as noted above, they will increase infiltration and increase the landslide risk. They should be required to build a scalable WWTP initially before development is permitted.

As a side note, anyone who's skied up there very often, should have noticed that MR's existing treatment system is likely failing, or at least undersized, as indicated by persistent odor during periods of peak use—particularly during extreme cold events when treatment efficiency is lowest.

4. Secondary Access and Conservation Conflict

While a secondary access route is necessary for safety and emergency response, Preferred Option 1 is not acceptable due to its direct conflict with the existing conservation easement established as mitigation for the prior Wheeler Ridge Orchard development. Any new road construction through that property would permanently impair its conservation values and violate existing mitigation commitments. The Final EIS must eliminate this option and require selection of an alternative alignment that does not impact conserved lands.

These revisions are necessary to ensure compliance with SEPA's requirements and to protect the long-term environmental and public interests in the Squilchuck basin.

Thank you for considering these comments. Please include me as a party of record and notify me of all future environmental review and decision-making related to this proposal.

Sincerely, Adam Neff From: Emily Johnson
To: Mike Kaputa

Subject: Protect the Mission Ridge Wildlife Habitat!! **Date:** Monday, October 20, 2025 12:26:16 PM

Dear Mike Kaputa, Chelan County NRD,

I am writing to urge you to select the No Action Alternative for the proposed Mission Ridge development. The DEIS fails to adequately address impacts to wildlife, habitat, and public safety, and does not meet Chelan County's standards for responsible growth.

The area surrounding Mission Ridge provides critical habitat for mule deer, elk, and wideranging carnivores such as black bears and cougars, as well as for species of greatest conservation need, including northern goshawks, golden eagles, whitebark pine, and American pika. These mountain and shrub-steppe transition zones are particularly sensitive to disturbance, serving as essential corridors for seasonal migration and climate adaptation. Fragmenting these connected habitats would cause long-term harm to wildlife movement, watershed health, and overall ecosystem resilience.

These foothills and forested slopes are part of a larger ecological network linking the Cascade crest to the Columbia Basin. Protecting their continuity supports not only iconic wildlife but also the long-term resilience of forests and watersheds, which face increasing drought, heat, and fire risks under a changing climate.

The proposal also depends on exceptions to Chelan County codes, enabling expanded human development in a fire-prone, high-elevation landscape. Increased human activity would elevate wildfire risk, strain emergency response capacity, and degrade sensitive habitats that wildlife depend on for survival. These risks are precisely why county planning standards exist: to safeguard public safety and ecological integrity alike.

Conservation and community are not opposing goals. Upholding existing land use protections honors both people and place by ensuring that wildlife, clean water, and natural character remain part of what makes this region special. Thoughtful planning today ensures that future generations can continue to hunt, hike, ski, and find connection in landscapes that remain wild and whole. Please select the No Action Alternative to protect the Mission Ridge landscape and the shared benefits it provides for wildlife and the community alike. The Wenatchee Valley deserves a safe, clean and thriving environment FOR ALL.

Regards, Emily Johnson Wenatchee, WA 98801 From: Andy Dappen

To: <u>missionridgeeis@outlook.com</u>

Subject: Tamarack Saddle Development - DEIS Comments

Date: Monday, October 20, 2025 11:32:16 AM

Mr. Kaputa,

I'm writing to provide input on the DEIS prepared for Tamarack Saddle's development plans adjacent to the Mission Ridge ski area.

First, I will make a few comments that are not directly related to the DEIS but are important in shaping how the community (and maybe the county?) thinks about this project. This might give a different perspective on the need (or lack of need) for the development.

I recently wrote an OpEd for The Wenatchee World describing how Tamarack Saddle in 2018 sold the importance of the development by stating it was a necessity for the ski area to survive financially. Since then, Washington State skiing has changed significantly to the point that, by the ski area's own accounting (using figures presented by the ski area at different meetings about the skier-visits needed for profitability vs. figures quoted in the DEIS about actual skier visits) the ski area is now doing quite well financially without the development. The developer himself is no longer stating the development is needed to sustain the ski area and indirectly confirmed this at the Mission Ridge Forum at Pybus in February by stating that even without the development, Mission Ridge was not going away. It is important to emphasize that the development is not needed to keep the ski area viable because that old narrative generated most of the community support for the project. More about this issue at this link: https://www.wenatcheeworld.com/opinion/opinion-develop-or-die--a-dead-argument/article_342dcbdb-7526-4508-8769-954c6c23bf5d.html

The proposed ski village will have dozens of impacts to current residents of Chelan County and the City of Wenatchee. There are issues pertaining to wildfires, preexisting water rights, traffic, sewage, displaced wildlife, disrupted elk migrations, preexisting recreation, noise, light, and more. Many of these problems are not being adequately addressed in the DEIS and the variances or exceptions asked for in the DEIS are not appropriate considering the disturbances caused (more discussion about a few of these points later in this letter).

An important issue not even addressed in the DEIS relates to climate change. The main attraction of this development will be the immediate access to downhill skiing, but climate models are showing that the operating seasons of most ski resorts in Washington State will be cut by over 50 percent by the year 2050. This may not

deter a developer looking for short-term profits, but the long-term ramifications and costs to the county of an isolated village in the woods that no longer has its primary reason for existence should be studied and adequately addressed in the revised DEIS. This should also impact what kind of infrastructure and costs the county is willing to incur as it moves forward. Should the developer want to proceed to develop a village with a limited life, let him also incur all the short-term costs affiliated with that development as well.

The main intent of this letter, in a nutshell, is to emphasize that the **county should strictly adhere to its codes** in the process of evaluating and approving this development. If the developer adheres to the codes and regulations of the county, it should be his right to proceed, but the county should not ignore, make variances, or make exceptions to its codes and normal regulations to facilitate a development that imposes so many problems upon our current residents -- particularly when the large majority of these residents do not even ski. Also while there will be some expenses required of the county if the project moves forward, the county should not agree to take on any discretionary expenses that the developer wishes the county to absorb. This project will impose many burdens upon the community so it is completely appropriate that the developer shoulder the true financial costs to bring his vision to life. This is especially true if the county should approve this development as a Master Planned Resort (which as described later the project does not qualify for) - in this case it is incumbent upon the developer to absorb all of the affiliated infrastructure costs.

Now for more pointed comments directed at the DEIS

1) Wildfire. The wildfire hazards associated with this village, is among the most disturbing issue. It is well recognized by fire authorities that in the right weather (with high temperatures, high winds, and low humidity) an unstoppable fire could overwhelm the proposed village and destroy it. Unstoppable fires in Okanogan County (2014 and 2015), Colorado (2021), Oregon (2020), and California (2025) have each taken lives and each burned between many hundred and many thousands of structures (primarily homes). In these cases, loss of life was relatively low because people had the means to vacate their property through multiple escape routes. Not requiring a secondary access road to this village and thinking a singleaccess road is adequate is to ignore what is repeatedly being reinforced throughout the West. Giving an exception to county codes requiring a secondary access road and allowing for a single-access/egress road in our dry, fuel-loaded forests is dangerous to the point of being negligent. Furthermore, the DEIS uses false assertions that the single road will be "wider" implying "safer". As described below in the next point, the proposed road is not truly wider but simply the width of the current road to the ski area, and the current road is not nearly wide enough for

even the predicted traffic caused by the development.

In a very plausible future scenario in which an unstoppable summer fire destroyed most of the village and resulted in significant loss of life because residents had no escape route, it seems possible the county could be held liable for its negligence in ignoring fundamental codes facilitating safety. Even if the county carries insurance for such possible disasters, could that insurance be negated through negligence? And even if legal counsel believes there is no future financial risk for a negligent decision, does the community want the stain of having facilitated the creation of such a dangerous development? This plan should not allow for the possibility of a development that knowingly and willingly puts people who invest in our community at risk — the county codes should be followed and a secondary access road should allow all residents and visitors to the village multiple means of escape from wildfire or other disasters.

- 2) Traffic. Per table 15.30-4 of Chelan County Code section 15.30.240, the proposed road is inadequate by county codes for a rural collector of only 4000 ADT. The predicted traffic for the proposed road is 10,000 ADT, 2.5 times more than the most traffic conceived of by Chelan County for a rural collector. The DEIS needs to mitigate for this level of traffic with a truly wider road to handle this level of traffic. Because this wider road would be required solely because of the development, it should be the developer's responsibility to pay for the majority of this upgrade.
- 3) MPR. Because a development of this size in this location violates the Urban Growth Act, the developer is trying to establish the development as a Master Planned Resort. The development, however, violates the rules of an MPR on multiple fronts (it is not self contained, will have many accommodations that are not just for short-term visitors, doesn't accommodate affordable housing for employees, and does not maintain the rural character of the resources it uses). The MPR Overlay should only be allowed if the project is changed to truly fit within the parameters of an MPR and if the developer (not the county) shoulders all the infrastructure costs associated with an MPR.
- 4) Phasing. The phasing of multiple aspects of the development (water and sewage in particular) is not adequately mitigated for in the current DEIS. The water budgets of the Squilchuck and Stemilt basins are already fully tapped out in summer and without PUD water being supplied to the development, new upstream users will be stealing water from downstream users who have pre-existing water rights. PUD water must be supplied to the development in Phase 1 of the project. The same applies to sewage. Rather than allowing effluent to contaminate the watershed in early phases of the project as now proposed, an appropriate sewage plant for the development needs to treat the development's sewage from the very start of the

project (i.e., during phase 1).

5) Other. There are other issues not being adequately addressed by the current DEIS: pre-existing recreation is being displaced, wildlife migrations are being disturbed, WDFW lands whose terms of purchase do not allow them to be part of a four-season resort are being used inappropriately.... I will state here that I am aware of these shortcomings and support others who spend more time defining the problem and appropriate measures to mitigate for those problems.

The current DEIS fails in some ways to anticipate future problems, but it fails in much larger ways to adhere to current codes and regulations. The best way to protect the county's current and future residents from the detrimental impacts of this development is neither to ignore nor give exceptions that undermine the codes that protect the public good. I'm hopeful the county will reject the current DEIS which is deeply flawed and recommend 'No Action' (the only alternative offered) until a revised DEIS effectively and responsibly mitigates for the many problems associated with this development.

Sincerely,

Andy Dappen

(2332 Westview Drive, Wenatchee, WA 98801)

PS. I would appreciate a reply noting that this email was received and will be added to the public record.

From: <u>Jan Dappen</u>

To: missionridgeeis@outlook.com
Subject: Tamarack Saddle's DEIS

Date: Monday, October 20, 2025 11:21:21 AM

Mr. Kaputa,

This letter comments on the DEIS prepared for Tamarack Saddle LLC's development plans adjacent to Mission Ridge.

First, I'd like to respond to the economic argument that Tamarack Saddle was allowed to include in the DEIS. This seemed inappropriate for the environmental issues and mitigations that the DEIS was to cover and allowed a developer to include his own subjective argument that is entirely speculative and, thus, could easily be labelled as propaganda. This information should be struck from the revised DEIS ...or countervailing opinions about the economic problems often associated with four-season resorts should also be included to give a balanced perspective about economic issues.

What are these problems?

1) Most jobs associated with such resorts are low-paying tourist and retail jobs that do not provide livable wages and, therefore, provide high levels of turnover and create transient communities. 2) Year-round resorts escalate housing costs as relatively wealthy recreationalists (often bringing dollars from higher cost-of-living cities) purchase second homes in resort communities. For locals living in such communities prior to its transition to a resort community, this price increase may make housing unaffordable. Meanwhile increased property taxes may force old time residents with lower incomes or fixed incomes to move out of the community. 3) Significantly increasing the number of affluent people with second homes while reducing the fulltime residents of the community who cannot afford to live there any longer erodes the community fabric. Realistically this could transform Wenatchee into another Bend, Whitefish, Whistler, or Sand Point. Such communities are affluent but monolithic culturally and are places that non-recreationalists move away from. Given that the majority of Wenatchee residents are currently not the kind of recreationalists who partake in the activities of a four-season ski resort, the economics the developer is promoting works against the interests of most of Wenatchee's current population.

Now onto problems the current DEIS does not adequately address.

Displacement of current recreation.

1)Clara Lake is a very popular winter destination for those of us who winter walk and snowshoe. The parking for this trailhead will be displaced and it's not realistic to think people can park at the new village and walk nearly a mile along a busy road to access the trailhead. Parking needs to be preserved at the Clara Lake Trailhead. Also, given that the developer hopes to nearly double the number of people downhill

skiing at Mission Ridge, many of the family members of such skiers will not be skiers and will be in search of a place to walk or snowshoe. So the parking at the Clara Lake Trailhead should accommodate 1.5 or 2 times the number of people who currently use the trail. 2)Regarding Stemilt Basin backcountry skiing: The El Sendero Backcountry Ski and Snowshoe Club spent nearly a decade working with state planning processes and the Stemilt Basin recreation process to establish lands in the Stemilt Basin for non-motorized winter recreation. Some of those state lands are adjacent to the development and the backcountry skiing experience will be ruined by the development. This issue is not adequately addressed in the current DEIS. After such long efforts to establish a nearby, non-motorized backcountry skiing experience in the Stemilt Basin, an offset for what is being lost is needed.

Wildlife Disturbances.

Mission Ridge has never been licensed by WDFW with the intention of it being a four-season resort. The ski area's operating license ceases at the close of the ski season (in April) so as not to disrupt the animals (specifically elk) migrating through (or near) the resort. Game cameras are showing the animals wintering around the resort are more extensive than originally believed. Updated studies are needed to understand the true impact this development will have on wildlife before appropriate measures can even be suggested in a revised DEIS mitigating for these disturbances. Meanwhile it is doubtful whether some of the WDFW property included in the development plans can legally be used for such a purpose because the funding for the property was contingent on the property not being used within a four-season resort. Before the development can proceed, both issues in this section need to be studied. Then, game experts and legal representatives for WDFW can make appropriate recommendations for the revised DEIS.

Undermining The Stemilt Partnership.

The DEIS states that the Stemilt Partnership was formed to "keep future development from damaging the water, wildlife, and recreation of the upper Stemilt Basin, but this not the whole truth. Chelan County organized and created the Stemilt Partnership in 2007 to prevent urban-styled development in the upper Stemilt Basin. The proposed urban-styled development will impact the basin's water, wildlife and recreation. The revised DEIS should clarify that the proposed development is contrary to the core goals and values of the Stemilt Partnership. Furthermore, the revised DEIS should state that the Stemilt Partnership should be consulted to provide a unified voice on whether the public lands owned by WDFW and USFS are being appropriately used in contributing to the creation of this development.

Master Planned Resorts.

The development tries to define itself as a Master Planned Resort so that far denser development is allowed than allowed by the Urban Growth Act. The Comprehensive Plan defines MPRs to be self-contained destination resorts that consist of short-term visitor accommodations, provide affordable housing for employees, preserve the rural character or natural resource used, and are not composed primarily of single-family or multi-family dwellings. The proposed development fails to meet all these criteria and clearly does not meet the intent or the rules of an MPR. The revised DEIS should compare the proposal to the rules of an MPR and recommend against approving the development as an MPR.

Given the many problems affiliated with the proposed development and the fact that it does not qualify as an MPR unless many rules of an MPR are ignored, I ask that the county not ignore, bend, or loosen its rules to 'help' this development come into being. The problems this development will thrust upon the local skiers of Mission Ridge, current non-skiers of Wenatchee, and current residents of Squilchuck Creek and the Stemilt Basin do not justify relaxing or ignoring the county's codes. Hold the developer to the established regulations that were put in place to protect preestablished interests from being damaged (or even trampled) by new interests.

Sincerely,
Janet Dappen
2332 Westview Drive
Wenatchee, WA 98801

PS My husband (Andy Dappen) has also submitted his evaluation of the DEIS. I support the problems he has with the current DEIS. In particular, I echo the need for secondary access to the proposed resort to provide residents of the village some measure of safety when wildfire comes knocking (which it will).

From: Stu Smith

To: missionridgeeis@outlook.com

Subject: My comments regarding the proposed Mission Ridge expansion DEIS

Date: Monday, October 20, 2025 10:19:55 AM

Greetings,

Thank you for allowing me to comment on the DEIS. The DEIS is faulty and incorrect for several reasons, as follows:

4.2.1.1, Wildfire risk

I live in the Squilchuck basin, and have already had to perform a mandatory evacuation twice. The greatest fire danger in this watershed comes during the hot, dry summer months, accompanied by winds from the north that flow directly up the Squilchuck valley. If fire occurs in the lower to mid valley region, the resulting fire behavior would make evacuation from the proposed village impossible. This is not a question of "if", but "when". Two wildfires have occurred within the last 4 years in the lower part of the valley, requiring extensive control efforts. This summer saw the Labor Mountain fire encroach upon the area. Furthermore, the last two years have seen extensive tree mortality just north of the ski area, adding fuel to an already drying and warming environment. Add to that mix thousands of visiting people in the village area, which will only increase the risk of an uncontrollable fire, threatening the lives of many people.

Unfortunately, the DEIS severely underestimates the massive fire behavior that is likely in the area. Additional review involving wildfire experts is needed to assess the true risk of wildfire in the proposed area, not only for current conditions, but those that are likely to be expected in the future.

4.2.1.2, Shelter in place, safety zones

This section of the DEIS is fundamentally lacking in analysis. It simply states, without any knowledge or analysis, that the Mission Ridge parking lot *may* serve as a wildfire refuge. This is absurd; it is not known if the parking lot may safely protect up to several thousand people from a wildfire.

This section of the DEIS is nothing more than a hopeful guesstimate. The well-being and lives of many people depend on a rigorous analysis of how guests and residents will be protected when (not if!) wildfire impacts the area. The DEIS must have a complete reworking of this section.

Thank you for taking the time to review my thoughts.

Stuart Smith 3096 Tamarack Pl Wenatchee, WA 98801 360-951-5131 wagmorebarkless@protonmail.com From: Kristin Effland
To: Mike Kaputa

Subject: Please Ensure Growth is more Beneficial than Harmful

Date: Monday, October 20, 2025 7:51:56 AM

Dear Mike Kaputa, Chelan County NRD,

I am writing to urge you to select the No Action Alternative for the proposed Mission Ridge development.

The developer has not adequately planned for water usage or waste removal/treatment or traffic/road usage or utility needs. If this were to be approved, I urge you to ensure the developer is following all codes and that development is contingent on the developer paying for road widening, an additional access road, utility extensions, sewage line extensions and water line extensions. The current plan is not based on adequate data and will violate multiple codes.

The DEIS fails to adequately address impacts to wildlife, habitat, and public safety, and does not meet Chelan County's standards for responsible growth.

The area surrounding Mission Ridge provides critical habitat for mule deer, elk, and wideranging carnivores such as black bears and cougars, as well as for species of greatest conservation need, including northern goshawks, golden eagles, whitebark pine, and American pika. These mountain and shrub-steppe transition zones are particularly sensitive to disturbance, serving as essential corridors for seasonal migration and climate adaptation. Fragmenting these connected habitats would cause long-term harm to wildlife movement, watershed health, and overall ecosystem resilience.

These foothills and forested slopes are part of a larger ecological network linking the Cascade crest to the Columbia Basin. Protecting their continuity supports not only iconic wildlife but also the long-term resilience of forests and watersheds, which face increasing drought, heat, and fire risks under a changing climate.

The proposal also depends on exceptions to Chelan County codes, enabling expanded human development in a fire-prone, high-elevation landscape. Increased human activity would elevate wildfire risk, strain emergency response capacity, and degrade sensitive habitats that wildlife depend on for survival. These risks are precisely why county planning standards exist: to safeguard public safety and ecological integrity alike.

Conservation and community are not opposing goals. Upholding existing land use protections honors both people and place by ensuring that wildlife, clean water, and natural character remain part of what makes this region special. Thoughtful planning today ensures that future generations can continue to hunt, hike, ski, and find connection in landscapes that remain wild and whole. Please select the No Action Alternative to protect the Mission Ridge landscape and the shared benefits it provides for wildlife and the community alike.

Regards, Kristin Effland 8650 Icicle Rd Leavenworth, WA 98826 From: <u>Erin Andrade</u>

To: <u>missionridgeeis@outlook.com</u>

Subject: Mission Ridge DEIS community member concerns

Date: Sunday, October 19, 2025 8:36:58 PM

Attachments: MRSRExpansion.docx

Thank you for reviewing my response to the Mission Ridge DEIS. Please confirm receipt of this e-mail and let me know if you have any issues accessing the attached Word document.

Sincerely,

Erin Andrade

Dear Mr. Mike Kaputa,

I have many concerns about the Mission Ridge Expansion MPR DEIS. I agree with the points raised by Conservation Northwest, at the end of this letter. One of my concerns is with the statement:

The Applicant has determined that the Proposed Project is necessary to provide diverse outdoor recreation opportunities sufficient to meet public demand, both locally and regionally.

As a resident of Wenatchee, and avid outdoor enthusiast, I can speak to local and regional outdoor recreation opportunities already in existence. I request that the Mission Ridge Expansion MPR DEIS specifically demonstrates how we are lacking sufficient outdoor recreation opportunities to meet public demand. They should also elaborate on other viable options, aside from a "no action" alternative. If anything, most weekends I struggle to figure out plans; not for lack of outdoor recreation opportunities, but because I am overwhelmed by the variety of options.

The proposed expansion project primarily caters to the elite by prioritizing luxury lodging, and exclusive amenities that cater to wealthier visitors and second-home owners. The focus is not on improving diverse outdoor recreation opportunities. Simply put, this expansion project does not improve outdoor recreation opportunities for the greater public but caters to the elite minority. These expansions often increase property values and resort prices, making access more difficult for local residents and average-income families.

By contrast, sustainable growth strategies that leverage existing community resources and transportation infrastructure promote inclusivity and broader access to winter recreation for the "public". These strategies also support our local economy.

I advocate for sustainable transportation and improved utilization of existing resources as a preferable alternative to expanding ski resort infrastructure into sensitive natural areas. Ski resorts can accommodate growing visitor demand while minimizing environmental impact by investing in enhanced transit options and leveraging existing nearby community resources.

Below, I outlined counterpoints to the supposed need for resort expansion as a way to provide diverse outdoor recreation opportunities sufficient to meet public demand. I provided viable alternatives to resort expansion, as detailed below.

Purpose and Need:

The Applicant's objective is to expand Mission Ridge as part of a MPR to enhance existing services and provide year-round outdoor recreation opportunities.

Current limitations that impede resort operations include:

• Insufficient on-site parking facilities to meet peak demand

I urge resort management and local governments to prioritize investments in shuttle services, public transit partnerships, carpool incentives, EV charging infrastructure, and road safety enhancements. These measures reduce traffic congestion, lower emissions, and create a more inclusive and resilient outdoor recreation experience. Promoting these alternatives obviates the need to expand parking.

• Undersized and crowded beginner skier terrain

Mission Ridge does not need to expand its beginner terrain because the existing beginner areas, coupled with other local and regional ski resorts, sufficiently meet current demand. The resort's terrain distribution, with about 10% beginner trails, aligns well with visitor needs, allowing it to maintain its character and minimize environmental disturbance. On average, most ski resorts dedicate approximately 10-20% of their terrain to beginner slopes, ensuring a balanced mix of terrain for all skill levels. This percentage allows resorts to cater to novices while maintaining challenging options for intermediate and advanced skiers. Mission Ridge's allocation of about 10% beginner terrain aligns with this industry standard, supporting the argument that its current beginner offerings sufficiently meet visitor demand without requiring expansion

Nearby resorts with more extensive beginner terrain options provide alternatives for those seeking a wider variety of beginner slopes. Badger Mountain Ski Resort provides beginner and intermediate terrain with affordable access, serving the East Wenatchee community. Loup Loup Ski Area, located between Twisp and Okanogan, features groomed trails suitable for all skill levels, supported by a strong community foundation. In fact, Mission Ridge Premier Pass holders can receive 3 free passes at Loup Loup. Echo Valley Ski Resort offers a family-friendly ski area with beginner terrain, ski/snowboard instruction, and tubing facilities, making it a valuable alternative for novice skiers near Mission Ridge. The Ski Hill in Leavenworth provides beginner and intermediate terrain and a family-friendly magic carpet.

Stevens Pass and Snoqualmie Pass offer additional beginner terrain options for visitors near Mission Ridge. These resorts provide a range of beginner-friendly slopes and amenities, making them suitable alternatives for novice skiers. Stevens Pass, located about 70 miles west of Mission Ridge, features dedicated beginner areas and ski schools, while Snoqualmie Pass, closer to Seattle, offers extensive beginner terrain and convenient access.

These nearby ski areas complement Mission Ridge by offering diverse beginner terrain options without necessitating expansion of Mission Ridge itself. This network of resorts supports sustainable recreation by distributing visitor demand and preserving the natural environment.

• Lack of recreation options for non-skiers

Mission Ridge and the surrounding area already offers a variety of winter non-alpine skiing alternatives that enhance visitor experience and attract a broader audience. These include snowshoeing or backcountry skiing around Lake Clara and winter hiking or snowshoeing opportunities at Devils Spur. Squilchuck State Park provides additional winter recreation options such as snowshoeing, hiking, fat-tire biking, sledding, and wildlife viewing in a natural forest setting. Outdoor enthusiasts can enjoy a variety of groomed snowmobile trails around Beehive Mountain and Wheeler Reservoir.

The nearby Leavenworth Winter Sports Club offers a variety of venues for Nordic skiing, tubing, and fat tire biking, while the Plain Nordic Trails offer cross-country skiing options for all skill levels. Echo Ridge offers Nordic skiing, snowshoeing, and fat tire biking. Loup Loup Ski resort offers cross-country skiing, fat-tire biking, and the Bear Mountain Luge. Blewett Pass has groomed snowmobile trails, snowshoeing, and more rugged Nordic skiing opportunities. Lake Wenatchee also affords snowmobiling, Nordic skiing, and snowshoeing.

These alternatives support inclusive outdoor recreation and complement the skiing experience without requiring resort expansion. The lower-costs of these activities cater to a wide public audience, compared to the prohibitive costs of staying at a ski resort or paying for an alpine day pass.

For non-skiing guests, the Wenatchee area offers additional recreation options including indoor pickleball and tennis courts, bowling alleys, public ice skating, pottery lessons, a rock climbing gym, yoga, and cultural attractions such as the Wenatchee Valley Museum & Cultural Center and Performing Arts Center. These amenities provide diverse entertainment opportunities for visitors who prefer indoor activities or want a break from outdoor recreation.

For summer recreation, expanding ski resorts to include mountain biking can positively impact revenue by diversifying income streams and extending the operational season beyond winter months. Many ski resorts have successfully utilized existing lift infrastructure to offer lift-served mountain biking, scenic chairlift rides, and other summer activities such as disc golf. This expansion attracts a broader visitor base, creates year-round employment opportunities, and helps retain staff throughout the year. Additionally, summer activities can boost local economies by increasing tourism during traditionally slower months. However, careful planning is necessary to balance environmental impacts and ensure the sustainability of these operations.

Lack of on-site overnight accommodations

On-site housing and lodging expansion are often proposed to support resort growth, but these are not always necessary or sustainable. Many resorts successfully serve visitors who stay in nearby towns, hotels, and vacation rentals, commuting daily via shuttle services, public transit, or personal vehicles. This model preserves the natural landscape, reduces construction impacts, and supports local economies.

Visitors to Mission Ridge can already commute easily within 30-45 minutes to the resort from Wenatchee via shuttle or car, enjoying both the ski experience and the town's cultural offerings. There are currently sufficient accommodations in Wenatchee and the surrounding area to meet the demand of out of town visitors. If, on the very rare occasion one cannot procure accommodations in Wenatchee, they can access outdoor recreation in the surrounding areas described above. I am not sure how a lack of on-site overnight accommodations

"impedes resort operations". I would want to know more information about this argument.

As demonstrated, there are already a variety of outdoor recreation opportunities at Mission Ridge and the surrounding area to address the public need for outdoor recreation. If Mission Ridge needs to separately address its financial sustainability; there are alternatives to ski area expansion such as investing in enhanced transportation options such as shuttle services and public transit partnerships, promoting carpooling and ride-sharing programs, expanding summer and off-season recreational activities to diversify revenue, and recognizing and promoting existing outdoor recreation activities. These strategies can increase resort profitability while minimizing environmental impact and supporting community well-being.

Thank you for considering these sustainable alternatives that balance growth with environmental stewardship and community well-being.

Sincerely,

Erin Andrade

See below for further concerns I share with Conservation Northwest

I am writing to urge you to select the No Action Alternative for the proposed Mission Ridge development. The DEIS fails to adequately address impacts to wildlife, habitat, and public safety, and does not meet Chelan County's standards for responsible growth.

The area surrounding Mission Ridge provides critical habitat for mule deer, elk, and wideranging carnivores such as black bears and cougars, as well as for species of greatest conservation need, including northern goshawks, golden eagles, whitebark pine, and American pika. These mountain and shrub-steppe transition zones are particularly sensitive to disturbance, serving as essential corridors for seasonal migration and climate adaptation. Fragmenting these connected habitats would cause long-term harm to wildlife movement, watershed health, and overall ecosystem resilience.

These foothills and forested slopes are part of a larger ecological network linking the Cascade crest to the Columbia Basin. Protecting their continuity supports not only iconic wildlife but also the long-term resilience of forests and watersheds, which face increasing drought, heat, and fire risks under a changing climate.

The proposal also depends on exceptions to Chelan County codes, enabling expanded human development in a fire-prone, high-elevation landscape. Increased human activity would elevate wildfire risk, strain emergency response capacity, and degrade sensitive habitats that wildlife depend on for survival. These risks are precisely why county planning standards exist: to safeguard public safety and ecological integrity alike.

Conservation and community are not opposing goals. Upholding existing land use protections honors both people and place by ensuring that wildlife, clean water, and natural character remain part of what makes this region special. Thoughtful planning today ensures that future generations can continue to hunt, hike, ski, and find connection in landscapes that remain wild and whole. Please select the No Action Alternative to protect the Mission Ridge landscape and the shared benefits it provides for wildlife and the community alike.

Additionally, the issues that are most likely to result in a lawsuit against the County if ignored are:

- 1. Traffic on Squilchuck and Mission Ridge Roads: The project creates a level of service condition below the minimum accepted Chelan County standard, yet no mitigation is proposed.
- 2. Secondary Access: The code is clear that secondary access is required, yet the developer presents inappropriate loopholes to avoid this safety requirement.
- 3. WDFW Land Exchange: WDFW has stated that "...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.", yet the project is proposed including this WDFW land.
- 4. Master Planned Resort Overlay: The developer is depending on this land use strategy that allows dense urban style development outside the urban growth boundary. Without the MPR, this level of development would violate the Urban Growth Act and could not be allowed. Despite depending on this planning tool, the development violates the requirements of MPRs including: The development is not primarily a destination resort, is not self-contained, does not consist of short-term visitor accommodations, does not consider affordable employee housing, and does not preserve the rural character or natural resource it uses.

From: <u>Eric Smith</u>

To: missionridgeeis@outlook.com

Subject: Public Comment - Mission Ridge DEIS

Date: Sunday, October 19, 2025 6:04:35 PM

Dear Mr. Kaputa,

I appreciate the opportunity to provide public comment on the draft EIS for the proposed Mission Ridge expansion. I think the County has done a good job in disseminating this information in a thoughtful and organized manner to the public. As an avid proponent of the Mission Ridge Ski Area (as it currently stands), I feel that it is challenging but necessary for me to voice opposition to the draft EIS and the overall philosophy of the expansion. I generally concur with the comments that Friends of Mission Ridge will provide. After review, I believe their comments to be very thorough and accurate, and I recommend that the County pursue the **No Action** alternative.

At a high level, I believe that allowing dense development in the area proposed would be inconsistent with the Growth Management Act and County Code. While some aspects of such a development may be mitigated, the DEIS clearly shows that the developer is proposing a phased approach that would allow substantial development in initial phases while delaying major infrastructure extensions and other mitigatory measures to later stages. This approach is likely intended to defer or avoid costs associated with these measures in hopes that the County, the PUD and other agencies will subsidize improvements once the use is established, thereby placing costs on the public that should otherwise be borne by the developer. I believe that the County should rigidly apply their existing code in review of this development. Where code is not completely clear, the County should default to protecting public interest. In my view, the DEIS did not provide sufficient evidence that proper mitigation can or will be provided, or was intentionally misleading in many cases. One example is wastewater disposal. The DEIS states that the development will utilize a combination of LOSS (early phases) and a WWTP. The early phases will exceed the legally allowable limit for a LOSS (100,000 gpd). Further, insufficient geotechnical information is provided to determine if a LOSS is even feasible, though it is likely to be challenging given the geology as well as the concerns to groundwater protection (nitrogen specifically) and nearby surface water. A LOSS will be challenging to implement given the geology, highly seasonal wastewater loading, and major freezing considerations. The other major ski areas in Washington (Crystal, Stevens and Snoqualmie) all utilize WWTPs and these resorts have much lower flow than is projected for the Mission Ridge development. Given all of these issues, the DEIS should have included meanful planning of a WWTP by documented engagement with Ecology, sizing, location and groundwater vs. surface water discharge, etc. The likelihood of procuring an NPDES or State Waste Discharge Permit and successfully implementing a WWTP is highly unknown at this level and would require significant investigation and planning by the developer to be confidently understood. However, this is just one example where the DEIS was intentionally vague or misleading in order to push the ultimate decision-making on wastewater disposal (a subject of major environmental consequence) to after the EIS. I believe this to be a fundamental issue that should be clarified or resolved during the EIS process.

I urge the County to review such issues thoroughly and objectively in the context of established code and laws. If this is done, I believe that the **No Action** alternative will be the clear and prudent choice.

Thank you, Eric Smith East Wenatchee From: <u>Ian Woodford</u>

To: <u>missionridgeeis@outlook.com</u>

Subject: Comment on Mission Ridge Expansion Master Planned Resort DEIS

Date: Sunday, October 19, 2025 4:55:06 PM

Hi Mike Kaputa & Chelan County,

I live on Squilchuck Road, and after reading portions of the DEIS, I've identified a few concerns below:

On days when the ski area is open, it can already be challenging for residents to safely pull out onto Squilchuck Road. This development is so large that traffic would increase significantly and become a year-round issue. The DEIS does not provide a sufficient mitigation plan, largely due to the findings in the Traffic Impact Analysis Report, which used SR-97A as its baseline for comparison. However, that road is flat, straight, has wide shoulders, and is a literal highway. Mission Ridge Road, on the other hand, is a winding 7% grade, and I don't think any reasonable person would benchmark it against SR-97A during a study. In other words, the existing traffic analysis is invalid and must be revisited.

I also see that a section of land necessary for this development (Section 25) is currently owned by WDFW which was set aside for wildlife restoration. This appears to require a land swap, but that's not part of the current proposal. Therefore, I don't understand how this development could be approved without that issue being resolved first. Can you please help ensure this is addressed if another EIS is prepared?

Finally, the DEIS omits or downplays the presence and impact on species such as eagles, pika, elk, and whitebark pine. I recently saw a film about the development that showed all of these species directly within the proposed area. I'm not sure whether the DEIS contractor failed to identify them or intentionally minimized their presence, but it appears that a brief camera survey documented them pretty quickly. Can you please help ensure these impacts are addressed in more detail?

Please let me know my comment was received and thanks for your time.

Ian Woodford 49 Neverland Ln Wenatchee, WA 98801 From: <u>Eric Gullickson</u>
To: <u>Mike Kaputa</u>

Subject: Vote NO on the unnecessary Real Estate Development at Mission Ridge

Date: Sunday, October 19, 2025 3:36:41 PM

Dear Mike Kaputa, Chelan County NRD,

Please select the No Action Alternative for the proposed Mission Ridge development. The DEIS fails to adequately address impacts to wildlife, habitat, and public safety, and does not meet Chelan County's standards for responsible growth.

The area surrounding Mission Ridge provides critical habitat for many species of animals and plants that this development would destroy or significantly harm. These foothills and forested slopes are part of a larger ecological network linking the Cascade crest to the Columbia Basin. Protecting their continuity supports not only iconic wildlife but also the long-term resilience of forests and watersheds, which face increasing drought, heat, and fire risks under a changing climate.

The proposal also depends on exceptions to Chelan County codes, enabling expanded human development in a fire-prone, high-elevation landscape. Increased human activity would elevate wildfire risk, strain emergency response capacity, and degrade sensitive habitats that wildlife depend on for survival. These risks are precisely why county planning standards exist: to safeguard public safety and ecological integrity alike.

Conservation and community are not opposing goals. Upholding existing land use protections honors both people and place by ensuring that wildlife, clean water, and natural character remain part of what makes this region special. Thoughtful planning today ensures that future generations can continue to hunt, hike, ski, and find connection in landscapes that remain wild.

On top of all that, the fire risk for such a development is just too high. There is absolutely no reason to put people lives at risk just so a few very rich people can make some extra money. The risk to our water is also very high and the DEIS does not do an adequate job of both recognizing the risk or introducing plans to mitigate said risk.

Overall this project puts peoples lives at risk, water at risk, animals and plants at risk and offers no real benefit.

Regards, Eric Gullickson 6997 Nahahum Canyon Rd Cashmere, WA 98815 From: Anthony Krajcer

To: <u>missionridgeeis@outlook.com</u>; <u>Liz Krajcer</u>

Subject: Public Comment on the Mission Ridge Expansion Draft Environmental Impact Statement (DEIS)

Date: Sunday, October 19, 2025 3:28:41 PM

Importance: High

Intended Recipient:

This comment is submitted for inclusion in the official public record of the Mission Ridge Expansion Draft Environmental Impact Statement (DEIS) under review by Chelan County Community Development, the designated SEPA lead agency. It is intended for county staff, reviewing agencies, and other entities formally involved in the environmental review process. It is not intended for use by parties with a financial or administrative interest in the proposed development.

Introduction and Standing

We are part time residents of the Forest Ridge community and frequent users of the Squilchuck and Stemilt Basin for recreation and quiet access to nature.

Our conclusions are based on a detailed review of the publicly available DEIS and SEPA materials, along with our own discussions with local residents, recreation users, and professionals familiar with land use and environmental planning. We have also reviewed coverage of the project in regional media, including *Wenatchee World* and *Northwest Sportsman Magazine*, as well as the information provided by Friends of Mission Ridge. These sources have helped us form a well-rounded understanding of the proposal and its broader context.

We share many of the same concerns raised by Friends of Mission Ridge regarding the scale, feasibility, and public risk associated with this proposed expansion.

This comment addresses climate change adaptation, ecological integrity, transportation and access, fiscal exposure, and the difference between the project's stated goals and its demonstrated investment. Our goal is to ensure that any approval is grounded in current science, fiscal prudence, and enforceable stewardship of the land and surrounding community.

1. Climate, Snow Reliability, and Water Feasibility

The proposed expansion depends heavily on new ski terrain and increased snowmaking, supported by water from Squilchuck Creek and Lake Creek and a proposed seventy acre foot reservoir. The DEIS includes water resource documentation, but there does not appear to be a climate adjusted snow reliability study that reflects recent warming trends or documented declines in snowpack.

Mission Ridge sits on the eastern slope of the Cascades, where total precipitation is much lower and mid-elevation snowpack is less reliable than on the west slope. The base area is about 4,570 feet and the summit 6,820 feet, with much of the proposed new terrain below 6,000 feet. For comparison, Stevens Pass ranges from 4,061 to 5,845 feet and Crystal Mountain from 4,400 to 7,000 feet. Despite similar elevations, those west slope resorts receive far greater snowfall, often twice as much, because of maritime moisture and colder upper elevations.

Data from the nearby NRCS SNOTEL station show that Mission Ridge's snow water equivalent averages roughly half that of higher precipitation resorts. Warmer winter temperatures, rain on snow events, and earlier spring melt make reliable operations increasingly uncertain and snowmaking far more energy and water intensive.

Given these conditions, Chelan County and the Forest Service should require an updated climate and snow feasibility study that uses recent SNOTEL and hydrologic data to evaluate realistic season length and snowmaking demands through the next 25 years. Building new terrain in a marginal snow zone carries both environmental and financial risk if natural coverage continues to decline.

2. Ecological Integrity and Habitat

The DEIS includes biological, wetlands, and plants and animals appendices that describe baseline habitat conditions. Baseline data alone are not sufficient when local ecosystems are already stressed by climate change and expanding human activity.

We ask that the wildlife and habitat analyses be independently peer reviewed and updated to reflect current species use and climate pressures. Seasonal movement corridors, including elk calving areas, mule deer fawning grounds, raptor nesting zones, and whitebark pine stands, should be clearly mapped and incorporated into a formal Habitat Management Plan adopted as a permit condition.

Recent reporting in *Northwest Sportsman Magazine* also highlights that the proposed expansion overlaps known calving and fawning areas and wildlife migration routes. Increased residential density and year-round recreational activity would further disrupt these habitats and increase human-wildlife conflict.

The claim that seventy percent of the property will remain as open space should be secured through recorded conservation easements or deed restrictions. The ecological and scenic value of the Stemilt Basin lies in its continuity and quiet. Urban density and extensive grading would permanently fragment that landscape.

3. Transportation, Access, and Road Alignment

The record references a Secondary Access Report in the DEIS appendices, but the public materials do not include the full alignment figures or slope stability overlays.

The Forest Ridge neighborhood lies directly below the Mission Ridge base area and is served by a county maintained road that was never designed or permitted for resort scale traffic. Residents have long expressed concern that Forest Ridge Road could become a default or emergency bypass for construction or resort overflow traffic. This would place disproportionate wear and safety burdens on an existing county road funded by taxpayers who receive no direct benefit from the development.

To protect public safety and fiscal fairness, Chelan County and the Forest Service should formally exclude Forest Ridge Road from any project related access, staging, or emergency routing. This exclusion should be a recorded condition of approval. If additional emergency egress is required, those routes should be engineered within the resort's own footprint or on newly permitted corridors specifically designed for that purpose.

Chelan County and the Forest Service should also

- Publish the complete alignment figures, alternatives, and geotechnical overlays showing slope hazards and setbacks.
- Require independent peer review of the design and adopt slope buffers as binding conditions.
- Update the Traffic Impact Analysis to include peak holiday periods, shuttle operations, and evacuation modeling rather than relying on average hourly counts.

Without these measures, the proposed secondary access could create preventable safety and congestion issues for both residents and visitors.

4. Economic, Fiscal, and Credibility Considerations

The DEIS includes a 2019 Economic Significance Report, but that study predates major changes in climate, tourism demand, insurance costs, and construction economics. These factors significantly affect feasibility and should be reexamined.

Public reports indicate that the ownership group associated with Mission Ridge has also acquired Blacktail Mountain Resort in Montana. If expansion at Mission Ridge is essential for solvency, it is unclear why capital has been directed toward new acquisitions rather than modernization of lifts, snowmaking systems, and base facilities that remain outdated.

Chelan County and the Forest Service should require an independent and updated fiscal and market study that reflects current conditions. The applicant should disclose funding sources, confirm reinvestment commitments within the existing footprint, and present contingency plans should projected revenues not materialize.

Without transparency and independent review, the public risks inheriting unfinished or underperforming infrastructure in a sensitive basin.

5. Fire Risk, Wildland Urban Interface, and Insurance

The DEIS includes a Fire Protection Plan, but it does not appear to address the question of

insurability in today's wildfire insurance market. The Squilchuck and Stemilt corridor already experiences high premiums and coverage limitations.

Chelan County and the Forest Service should require proof that new structures meet defensible space and wildland interface standards, that the development can be insured, that sufficient on site water and suppression capacity exist, and that evacuation plans are tested for both summer and winter conditions.

6. Public Services, Infrastructure, and Cost Exposure

The project narrative suggests that future tax revenues and annexations will offset public costs, but no independent fiscal audit confirms this. Chelan County should require a comprehensive fiscal impact analysis covering road maintenance, emergency services, and long term infrastructure support.

Each project phase should depend on verified service capacity, signed agreements with relevant agencies, and binding financial guarantees to ensure taxpayers are not left responsible for incomplete or stranded infrastructure.

7. Transparency in the Public Comment Process

The DEIS webpage directs comments to an Outlook email address rather than a county domain. This appears inconsistent with standard SEPA practice and raises questions about how public comments are being handled and archived. We respectfully request clarification that all comments submitted through this address or the online form are being received and stored directly by Chelan County as the SEPA lead agency. Clear and transparent handling of public comments is essential for public confidence in the review process.

8. Refined Requests

- 1. Publish complete Forest Service road alignment maps, alternatives, and slope hazard overlays.
- 2. Formally exclude Forest Ridge Road from any project related access, staging, or emergency routing and document that exclusion in the approval record.
- 3. Require an updated climate and snow reliability study using current SNOTEL and hydrologic data.
- 4. Commission an independent fiscal and market feasibility analysis that reflects post 2019 conditions.
- 5. Limit commercial space to uses that directly support mountain recreation and exclude unrelated retail.
- 6. Record conservation easements for all open space and habitat areas.

- 7. Require peer review of geotechnical studies and adopt slope buffers before grading.
- 8. Link each development phase to confirmed water, wastewater, and stormwater capacity.
- 9. Submit documentation of insurance feasibility and wildfire resilience.
- 10. Require tangible reinvestment in the existing Mission Ridge infrastructure before new entitlements are granted.

9. Conclusion

The Stemilt Basin is not an untapped resource but a living landscape that already serves the community as open space, wildlife habitat, and a place for recreation and reflection. Many analyses in the DEIS are dated or incomplete, and the proposal relies on assumptions that no longer align with current environmental or economic realities.

Chelan County has an opportunity to insist on updated data, transparent fiscal review, and enforceable conditions before granting any approval. Doing so will protect the integrity of the basin, the safety of surrounding neighborhoods, and the long term interests of the public.

Respectfully submitted,

Anthony and Elizabeth Krajcer Forest Ridge residents

From: <u>Tom Ettinger</u>

To: missionridgeeis@outlook.com
Subject: Mission Ridge Expansion

Date: Sunday, October 19, 2025 10:47:58 AM

Mission Ridge Expansion Master Planned Resort Draft EIS Mike Kaputa, Chelan County Department of Natural Resources 411 Washington St. Suite 201 Wenatchee, WA 98801

I oppose the proposed expansion of the Mission Ridge Ski & Board Resort.

In this day of climate change, it does not make sense to create a new residential expansion at a ski area with limited snowfall. Yes, Mission Ridge does have snowmaking capabilities, but even then the skiing is limited until there is adequate coverage by natural snowfall.

In this day of climate change, it does not make sense to create an residential expansion in an area where the urban/rural/forest interface is at risk for forest fire. There is currently "one way in" and "one way out". Already many homeowners in our valley have had homeowners insurance cancelled or have had difficulty obtaining homeowners insurance due to risk of wildfire. Is this not a problem for the proposed area of expansion? How will hundreds of residents be evacuated when the next fire threatens the area? A plan for emergency evacuation includes walking down a "road' to Stemilt Basin—are you kidding me?

Throughout the Stemilt Basin we have seen forest properties cleared and developed for orchards, reducing wildlife habitat. Wildlife corridors are so critical to genetic diversity and the health of our region's wildlife and birds. What about the wildlife who use this area of the proposed expansion throughout the year? How are their usual migratory patterns going to be affected? How disruptive will this expansion be? Is it even legal to expand the recreational use of the ski area year round under the federal permits that are now existing?

The current road to Mission Ridge is inadequate to accommodate the number of units to be developed as specified in the plan. The proposed development will exacerbate the carbon footprint of the ski area, rather than mitigating it. Summer activities are marginal in this area, and do not make it a promising summer destination. Hiking is limited, biking is steep and rocky. The long-term outlook over the next 20 to 50 years seems bleak for the ski area with effects of global warming.

Who will benefit from this development? Certainly the Mission Ridge Ski & Board Resort owners. Developers and builders might benefit. Tourism might benefit, although keeping people in downtown Wenatchee in motels and hotels and having them shop at local businesses and eating out in local restaurants seems to be a greater benefit for tourism.

The local residents of our communities will NOT benefit from this expansion.

I oppose the expansion of the Mission Ridge Ski & Board Resort. Please do not allow this to happen.

Sincerely,

Tom Ettinger 107 Fasken Dr Cashmere, WA 98815 Morsno@gmail.com From: Scott Kane
To: Mike Kaputa

Subject: Use Common Sense on Safety, Traffic, and Wildlife Habitat

Date: Saturday, October 18, 2025 2:44:46 PM

Dear Mike Kaputa, Chelan County NRD,

I am writing to urge you to select the No Action Alternative for the proposed Mission Ridge development. The DEIS fails to adequately address impacts to wildlife, habitat, and public safety, and does not meet Chelan County's standards for responsible growth.

The area surrounding Mission Ridge provides critical habitat for mule deer, elk, and wideranging carnivores such as black bears and cougars, as well as for species of greatest conservation need, including northern goshawks, golden eagles, whitebark pine, and American pika. These mountain and shrub-steppe transition zones are particularly sensitive to disturbance, serving as essential corridors for seasonal migration and climate adaptation. Fragmenting these connected habitats would cause long-term harm to wildlife movement, watershed health, and overall ecosystem resilience.

These foothills and forested slopes are part of a larger ecological network linking the Cascade crest to the Columbia Basin. Protecting their continuity supports not only iconic wildlife but also the long-term resilience of forests and watersheds, which face increasing drought, heat, and fire risks under a changing climate.

The proposal also depends on exceptions to Chelan County codes, enabling expanded human development in a fire-prone, high-elevation landscape. Increased human activity would elevate wildfire risk, strain emergency response capacity, and degrade sensitive habitats that wildlife depend on for survival. These risks are precisely why county planning standards exist: to safeguard public safety and ecological integrity alike.

Conservation and community are not opposing goals. Upholding existing land use protections honors both people and place by ensuring that wildlife, clean water, and natural character remain part of what makes this region special. Thoughtful futuristic planning today ensures that future generations of tomorrow can continue to hunt, hike, ski, access safely, and find connection in landscapes that remain wild and whole. The proponent EIS fails to do this. Please select the No Action Alternative to protect the Mission Ridge landscape and the shared benefits it provides for wildlife and the community alike.

Regards, Scott Kane 4900 8th St SE East Wenatchee, WA 98802 From: <u>Kyle Hadersberger</u>

To: <u>missionridgeeis@outlook.com</u>

Subject: Mission Ridge EIS

Date: Saturday, October 18, 2025 2:20:11 PM

Hi There,

I am writing to provide comments on the proposal to expand Mission Ridge. If this development is approved as proposed, it appears that it will have significant impacts on the following environmental factors: **traffic, water resources, and safety**. In addition, this proposal is not consistent with the locally developed planning documents such as the Stemilt-Squilchuck Community Vision.

Traffic:

The proposed increase in vehicular trips will exceed the current capacity of the condition of Squilchuck road. The developer has not proposed any improvements to Squilchuck road so that the road would meet the level of service requirements for the number of vehicular trips proposed per day. Thus, there will be traffic impacts associated with the current proposal. Therefore, if this project is approved, then the County should require the developer to improve the entire length of Squilchuck road so that it meets the standards for the number of vehicular trips anticipated per day.

Water resources:

This development would utilize more water in a watershed that is already over-allocated. In addition, the proposal for wastewater treatment is not fully worked out for the full development. This development should not be approved in phases. All utilities needed for full build out should be required as part of the project approval and installed at the onset of the project at the cost of the developer. Approval of this development should require the developer to pay for providing water from the PUD and the design and construction of a wastewater treatment plant to accommodate full build-out.

Safety:

This development as proposed does not provide secondary access in the event of a fire. If approved, the developer should be required to provide a paved secondary egress route in the event of a fire. If this secondary egress is not provided and Squilchuck road is blocked by a fire, this puts the residents of this development at high risk with limited options to evacuate during a fire.

Finally, this proposed development does not preserve the rural character of the area which is one of the requirements for a Master Planned Resort Overlay. This amount of development in the upper watershed is in conflict with the principles outlined in the Stemilt-Squilchuck Community Vision.

Kyle Hadersberger

From: GOOGLIER GOOG

To: <u>missionridgeeis@outlook.com</u>

Subject: Mission Ridge Expansion Master Planned Resort Draft EIS

Date: Saturday, October 18, 2025 12:36:37 PM

Dear Mike Kaputa, Chelan County Department of Natural Resources 411 Washington St. Suite 201 Wenatchee, WA, 98801

My name is Kathleen O'Bryan Boling and I am a Chelan County resident and have been for over 50 years. I am a mother of two, an outdoor education teacher, a former PUD wireman and an avid hiker. One of our family's cherished areas in which we recreate are the Squilchuck and Mission Ridge / Devil's Gulch area in the Wenatchee and Okanogan National Forest.

As a resident of this county, I appreciate our county officials and commend them for helping represent residents as they uphold the laws and regulations that keep our valley healthy, prosperous and safe. I also appreciate opportunities to have my voice count. Not only because I am a taxpayer and resident, but because my voice counts, especially in matters like these.

I strongly oppose the the Mission Ridge Expansion Master Planned Resort. Several project components are illegal as proposed and would cause increased financial burdens on taxpayers and the PUD as proposed in the draft EIS document.

Please review my specific objections below:

2.6.1 Alternatives Considered but Eliminated - Integrated Power Planning - Phased Review: The transmission line construction needed to facilitate this project is impermissibly excluded from review in the DEIS. WAC 197-11-060(5)(d) provides that phased review of a project is inappropriate where it would segment consideration of proposals required to be

evaluated in a single EIS under WAC 197-11-060(3) (b). The DEIS should be revised to consider transmission line construction.

4.2.1.5 Fire Risk - Emergency Access in Proposed Project Area - Fire Station: The DEIS acknowledges that a new fire station is required, but does not indicate that any of the BLS or fire protection costs will be borne by the development and only offers a location for Chelan County to build a fire station (to be paid for by the County). The DEIS should be revised to clarify that consultation with Chelan County Fire District is required and all costs for new service extension and capacity increase, including a new fire station and all apparatus required for that station, shall be borne by the development, and that these improvements must be in place and in operation before a single occupancy permit is issued.

4.2.1.5 Fire Risk - Emergency Access in Proposed Project Area - Single Access Road: The DEIS acknowledges that the proposed single access road could be blocked, but downplays the danger of a blocked exit during a wildfire as an inconvenience. The DEIS further states that on-site emergency services reduce the risk associated with a single pathway. It is misleading to suggest that on-site emergency services can reduce the risk of death from an approaching wildfire that can't be escaped because the single access road is blocked. The DEIS should be revised

to acknowledge that blockage of the single access road could result in fatalities.

4.2.1.6 Fire Risk - Anticipated Traffic Conditions and Relationship to Wildfire Risk: The DEIS states that "Having more than one evacuation route provides redundancy and increased safety, particularly during unexpected or fast-moving events. Having a single wider and well-maintained access route can serve this same function under CCC." A single wider wellmaintained access road does not provide redundancy or increased safety, and particularly not during unexpected or fast-moving events. Not only is this statement untrue, but as discussed in <u>Section 5.6.3.3</u> **Direct Impacts from Operation - New Public Access** Road, a 28 foot wide road does not meet minimum Chelan County design standards. Calling the single access road "wider", when in fact the proposed road width is inadequate, is both persuasive and dishonest. The DEIS should be revised to remove the persuasive and untrue statement that a single access road can provide redundancy and increased safety, and every reference to the access road as "wider" should be deleted.

4.2.2.2 Fire Risk - Secondary Access - Alternative: The DEIS states: "In response to public comments, Chelan County identified secondary access as a potential project alternative for this DEIS within the scope of "other reasonable alternatives for achieving the proposal's objectives on the same site."

Secondary access is not an alternative. It is a code requirement. If secondary access is possible, then it is required. The International Fire Code allows that the requirement for secondary access can be waived ONLY IF the modification will not lessen life and fire safety requirements. DEIS section 4.2.1.6 states that "Having more than one evacuation route provides redundancy and increased safety, particularly during unexpected or fast-moving events." This statement alone clarifies that not providing secondary access LESSENS life and fire safety. Secondary access should be required by Chelan County during the permitting process. The DEIS should be revised to include secondary access as an integral component of the project.

4.2.2.2 Fire Risk - Secondary Access - Update
Engineering Report: The Aegis Engineering
Secondary Access - Review of Options report argues
that not being able to completely achieve compliance
with road standards is a reason to dismiss Option 1
altogether, while simultaneously arguing that the
County must accept the firewise recommendations in
their Fire Protection Report as an acceptable
substitute to compliance with the secondary access
requirement. They argue to dismiss a good secondary
access route because it has a non-code compliant
corner, when creative engineering and design
deviations could easily overcome this issue. And they
also argue to completely throw out an important safety

code requirement for secondary access, because they have some creative mitigating ideas in another report. These arguments are not consistent or serious.

Therefore, the report should be updated to remove bias, and the DEIS should be updated to reflect the conclusions of the revised report.

4.2.2.2 Fire Risk - Secondary Access - Cost **Considerations**: The arguments against interconnectivity are 'too much cut' and 'road on property owned by others'. These are not impractical obstacles. These are project challenges that the applicant is happy to address on the main access road. The secondary access road costs money. This is not a hardship factor that needs to be considered by Chelan County. The applicant wants to create a city in a remote area and there are code requirements in place to protect residents and emergency responders in such an undertaking. Secondary access is one of those requirements. The applicant has not proved unusual circumstances that would relax the requirement. In fact, the applicant has provided preliminary design for a secondary access that follows existing road alignments to the east and provides good physical separation and redundancy from a fire escape perspective. Since secondary access is a project requirement, and may (and should) be required by the County during the permitting process, the **DEIS** should be revised to include secondary access as an integral component of the project and not as an alternative. The Aegis Engineering

Option 1 is the only reasonable secondary access presented, therefore Option 1 should be the route included in the DEIS.

4.2.2.2 Fire Risk - Secondary Access - Life/Safety Improvements must be operational prior to occupancy: The land use standards sought by the developer are defined by the Master Planned Resorts Overlay District (MPR) chapter of Chelan County Code.

Section 11.89.040(8) of the MPR code requires that all safety improvements must be installed and in operation prior to occupancy. The DEIS should be revised to acknowledge that the second access road must be operational prior to issuance of any occupancy permits.

Secondary Access summary: The engineering report should be updated to remove bias and provide consistency in rejection criteria between roads the developer wants to build, and those that he does not. The DEIS should be updated to reflect the conclusions of the revised report. The DEIS should be revised to include preliminary design for the proposed main access road, and include study of the environmental impacts of the Aegis Engineering Option 1 route as an integral project component and not as an alternative. The revised DEIS should acknowledge that the second access road must be operational prior to issuance of any occupancy permits.

4.2.3.2 Fire Risks - Impacts from Operation

Section 4.2.3.2 is 7 pages long and contains only 4 partial sentences describing impacts from operation. These are:

- During operation, the increased number of people will increase fire hazard risk...
- ...the Proposed Project will create higher summer use in the area, particularly in the Proposed Project Area, and therefore influence the potential for increased human-ignited wildfire.
- ...the introduction of additional utilities to the area in the form of electrical service and propane sources poses a risk.
- The increase in traffic to the Proposed Project Area will have an impact on emergency access through Squilchuck Road and the new proposed road to the development.

Not a single impact is listed in the Summary of impacts. The entire subchapter Section 4.2.3.2 should be rewritten to discuss and describe impacts. All persuasive language downplaying impacts or describing treatments or policies should be removed from this section.

<u>4.2.3.2 Fire Risk - Impacts from Operation - Vegetation Treatment</u>: The DEIS states that the probability of human-caused ignitions is low. This is misleading and not true. It is widely accepted that

roughly 85% of wildfires are human caused. To suggest that the risk of human caused fire in a dry forest with between 300 and 4000 people newly introduced to the landscape is insincere. **The DEIS** should be revised to remove this misleading statement.

4.2.3.2 Fire Risk - Impacts from Operation Defensible Space - Fuel Break Maintenance: The
DEIS states: "Defensible space and fuel break
maintenance practices and frequency were not
specified in the Fire Protection Plan..." The DEIS
should be revised to acknowledge that Tamarack
Saddle is a separate entity from New Mission LLC
(the ski area ownership company) and to include
defensible space and fuel break maintenance
practices and frequency in the Fire Protection
Plan.

4.2.3.2 Fire Risk - Impacts from Operation - Defensible Space - MPR Fire Protection Plan Requirement: The DEIS contains several bullet points that it says must be incorporated into this MPR Fire Protection Plan including: "Develop and maintain additional Safe Areas in strategic locations. This shall include constructing the base Lodge as a safe area and providing sufficient parking to afford one space for each dwelling unit." However, the project site plans do not show a new base lodge at the development, and the plans do not show an associated parking lot with either 886 or 1023 spaces (depending on whether hotel rooms and

employee beds count as dwelling units). If this requirement is to be enforced, then the DEIS should be revised to show the new base lodge and the safe area parking on the project maps. These project elements should be listed as a condition of approval on permits, and should be included in the Mitigation section of chapter 4.2 of the DEIS.

4.2.3.2 Fire Risk - Impacts from Operation - Fire Protection: The DEIS states: "Mission Ridge has a Crisis Action Plan and a Wildfire plan in place." **The**

DEIS should be revised to clarify that the development needs its own Crisis Action Plan and Wildfire Protection Plan and cannot rely on cooperation with a separate entity.

4.2.3.2 Fire Risk - Impacts from Operation - Fire Protection: The Aegis Fire Protection Plan argues not to conform to applicable requirements of the IFC, and instead asks that the Fire Marshall allow exceptions to reduce ingress/egress and fire flow requirements. IFC section 104.9 allows reduction in fireflow when "... such modification does not lessen health, life and fire safety requirements." The DEIS should be revised to acknowledge that the application materials suggest lower fire flow requirements and that relaxing the code would lessen life and fire safety and would therefore be a code violation.

4.2.3.2 Fire Risk - Impacts from Operation - Emergency Access: In lieu of a secondary access road, "...the applicant proposed to maintain an access road of at least 28 feet width to meet Chelan County Code 15.30.230(4)". A single access road is unacceptable. Secondary access requirements are discussed in section 4.2.2.2 Secondary Access. Secondary access is required. The DEIS should be revised to include study of the impacts of secondary access.

4.2.3.2 Fire Risk - Impacts from Operation -**Emergency Access - Fire Station:** The DEIS states: "Additionally, an annexed fire station would be staffed by a volunteer fire fighting team to complement coverage provided by CCFD1 to provide local immediate emergency response to any fire emergencies. Chelan County Fire District #1 has argued that the proposed location for a future fire station sharing space with the Ski Maintenance Facility cannot be accepted. The applicant has indicated that the fire station is to be built using County (not development) dollars and would be installed "...at the discretion of the fire district..." and staffed by volunteer firefighters. Chelan County Fire District #1 has argued that the District may not be able to recruit and maintain volunteers. The DEIS should be revised to include consultation with CCFD#1 with workable solutions that include the agreement of the Fire District and costs borne by the developer.

4.2.3.2 Fire Risk - Impacts from Operation - Emergency Access - CCFD1 Requirements: The DEIS discussed only two mitigation measures "related to emergency access proposed by the applicant in consultation with CCFD1." The issues discussed in the DEIS are incomplete to the list of Issues discussed in Fire Chief Brian Brett's March 30 comment letter. The DEIS should be revised to analyze the issues discussed in the March 30 CCFD#1 comment letter.

4.2.3.2 Fire Risk - Impacts from Operation - Summary of Impacts from Operations: The entirety of the summary of 7 pages of Impacts from Operations follows: "In summary, there are probable significant adverse operations-related impacts from increased human activity during high fire-risk summer season and additional traffic on access roads from the Proposed Project. These impacts can be partially mitigated for as described in Section 4.2.3.3." This is an inadequate summary of impacts as not a single impact is listed. The DEIS should be revised to provide an actual summary of impacts from operation.

4.2.3.3 Fire Risk - Proposed Mitigation Measures - Additional Applicant Proposed Mitigation Measures - Egress during Wildfire Season - Single Access: The DEIS indicates: "When evacuation is required:

 Primary egress will remain along Mission Ridge Road."

Secondary access is a code requirement, not a

mitigation requirement. Omission of secondary access in the discussion of evacuation mitigation is irresponsible. If secondary access were provided, then when the Mission Ridge Road was compromised, the residents of the development would have a safe exit and firefighters would have access to respond to the emergency. The DEIS should be revised to include secondary access as an integral plan element and not an alternative.

4.2.3.3 Fire Risk - Proposed Mitigation Measures - Additional Applicant Proposed Mitigation Measures - Egress during Wildfire Season - Tamarack duty: The DEIS states:

• If Mission Ridge Road is compromised (e.g. by fire, by car accident), Mission Ridge will work with local fire authorities to determine best options for protecting public health until Mission Ridge Road is again passable, and to accelerate the reopening of the road. Options may include:

This plan requires a separate entity, Mission Ridge, to be responsible for Tamarack Saddle safety. Mission Ridge is an independent entity that runs a ski area and has no ownership or obligation to the private development. The development is owned and operated by Tamarack Saddle, LLC. The owner of the property may not farm out its obligations to a neighboring business. The DEIS should be revised to acknowledge that Tamarack Saddle is a

separate entity from New Mission LLC (the ski area ownership company) and to include coordination with EMS in its own Crisis Action Plan.

4.2.3.3 Fire Risk - Proposed Mitigation Measures - Additional Applicant Proposed Mitigation Measures - Egress during Wildfire Season - Shelter-in-Place: The DEIS suggests:

• Shelter-in-place at Mission Ridge safe refuge areas.

As discussed in Section 4.2.1.2 Shelter-in-Place Strategy and Safe Refuge Areas - Safety Zones, The DEIS has not determined that the suggested shelter-in-place areas are actually compliant with applicable regulations or even safe. To suggest as mitigation that residents can stay in their homes when it is not clear that the homes are safe to stay in, is irresponsible and is not appropriate mitigation for fire danger. The DEIS should be revised to include studies to determine actual safe zone requirements and then discuss those areas with certainty.

4.2.3.3 Fire Risk - Proposed Mitigation Measures - Additional Applicant Proposed Mitigation Measures - Egress during Wildfire Season - Evacuation: The DEIS suggests:

• Evacuation of some portion of the residents/visitors via existing unimproved roads/trails to Squilchuck State Park or other locations if safe to do so.

The DEIS indicates that there are existing unimproved roads that exit the development to other locations. If, in their unimproved condition, these roads are adequate for evacuation by development residents, then with some improvements, these roads are reasonable secondary access routes. The DEIS should be revised to include the existing unimproved road option 1 as secondary access.

Further, the applicant appears to be suggesting that residents should **hike through the woods** to safety. In the situation where a wildfire is approaching the development and the only access road is blocked to vehicle traffic, encouraging residents to set out on foot to find safety appears reckless. **The inclusion of escape on foot as a plan element should be removed from the DEIS.**

4.2.3.3 Fire Risk - Proposed Mitigation Measures - Additional Applicant Proposed Mitigation Measures - Egress during Wildfire Season - Summary: None of the evacuation discussion in Section 4.2.3.3 is mitigation. It is a persuasive description of options that the developer is willing to present as evacuation or shelter-in-place locations. Omission of secondary access, shelter in place in locations not analyzed to be safe, suggesting evacuation by car along existing roads that the developer has declared impractical for secondary egress, suggesting evacuation by foot along trails through the forest, are all irresponsible safety suggestions, inconsistent with arguments made

elsewhere in the DEIS, and do not belong in the mitigation section of the Fire Risk chapter of the DEIS. The DEIS should be revised to include secondary egress, remove suggestions of unsafe egress strategies, and to provide analysis of the Mission Ridge Parking lot, the proposed remote day-use lot, and the homes and buildings that are presented without evidence as safe zones.

4.3.3.1 Visual - Impacts from Construction - Light and Glare: The Light and Glare section contains no quantitative measurements and instead relies on unverified assumptions. In addition, the DEIS claims that construction impacts are temporary in nature and therefore do not create significant adverse impacts. To disregard an impact because it is temporary is insincere when the temporary nature of the impact is expected to last twenty years. The DEIS should be revised to inventory current and proposed lighting and to delete the misleading premise and conclusion that the impact is temporary and therefore not significant.

4.3.3.2 Visual - Impacts from Operation - Building Height

The DEIS states that "The tallest building height will be approximately 45 feet...". Building height limits in the base zones are limited to 35 feet. CCC 11.89.50(5). The developer proposes to exceed that limit, but proposes no explanation for why they cannot comply with it. Without establishing that they cannot

comply with the building height limitation, the DEIS should clarify that the hearing examiner should not approve such a variance.

4.3.3.2 Visual - Impacts from Operation - Light and Glare - Sky View: The DEIS acknowledges the negative impact of added lighting on astronomy and night sky aesthetic, but it omits impacts on:

- local forests where camping and outdoor education occur
- the Manastash Ridge Observatory, which will experience noticeable skyglow increases.
- migratory mule deer may alter their routes
- cougars could change nocturnal hunting tactics
- salmonid navigation and predation rates can shift in response to artificial light.
- migratory birds using the Pacific Flyway also suffer increased collision risk under bright skies.

Light emitted from this expansion will spread beyond Mission Ridge, contributing to skyglow observed as far away as the Methow Valley which is already impacted by Mission Ridge skyglow. The DEIS should be revised to include a comprehensive analysis of light pollution impacts including safety risks, recreational impacts, and impacts on wildlife.

4.3.3.2 Visual - Impacts from Operation - Light and Glare - Driver Safety: The DEIS claims that additional nighttime light would improve safety for drivers and

visitors. This is not true. Additional nighttime glow will not improve safety for drivers or visitors. High levels of skyglow create a distracting halo that may reduce roadway safety. White light scattering by aerosols increases fog reflectivity, further degrading visibility under low-visibility conditions. The DEIS should be revised to remove the untrue statement that additional nighttime light will improve driver safety.

4.3.3.3 Visual - Proposed Mitigation Measures: The DEIS cites Chelan County Code 11.88.08 as the sole mitigation strategy for addressing light pollution. This reflects a minimalist approach to mitigation, offering regulatory compliance, not ecological stewardship. Additional mitigation strategies must be required. Prior to expansion approval, additional measures should be incorporated into a Light Management Inventory and Plan that reflects the best modern practices in dark sky protection. The DEIS should be revised to include mitigation measures beyond the bare minimum required by code.

4.4.1 Land and Shoreline Use Overview - Existing and Proposed Land Ownership and Land Uses: Mission Ridge built a temporary (one year) road in 2018 under categorical exclusions which required ground disturbance less than 1 acre, work monitored by an approved archaeologist, bridges designed and constructed to protect two streams, removal of no trees over 8" diameter at breast height (DBH), and

installation of erosion control measures and rehabilitation when the project is complete. However, none of these measures were followed. The DEIS refers to this road as a gated administrative road. This language is misleading and dishonest. The DEIS should be revised to omit the mischaracterizing language "administrative road".

4.4.1 Land and Shoreline Use Overview - WDFW and **DNR Land Exchange**: Section 25 is owned by WDFW and was purchased in 1953 with funds from the Federal Aid to Wildlife Restoration Act of 1937. Section 25 includes the upper half of Chair 4, Windy Ridge, Bowl 4, and overlaps with the proposed project. Hunters still use the section during archery and rifle seasons as well as for forest grouse hunting. Section 25 contains many WDFW Priority Habitats and Species, and its cool, north-facing slopes are unique, providing crucial wildlife habitat on Mission Ridge. The DEIS states that WDFW has indicated that: "...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 DEIS discusses a land exchange between WDFW and Washington State DNR that would result in DNR owning Section 25 and implying that expanded year-round resort would be allowable on DNR owned Section 25. However, the DEIS further states that: "The land swap is not part of the current Proposed Project." With the land exchange not on the table, and DFW indicating that expanded ski resort activity is not an allowable use of Section 25, the DEIS should be revised to modify the proposal to exclude section 25 from any expanded ski resort or development activity.

4.4.3.2 Land and Shoreline Use - Impacts from Operation - Zoning Planning and Policy Consistency: The DEIS states that the Stemilt Partnership was formed to "keep future development from damaging the water, wildlife, and recreation of the upper Stemilt Basin." This is NOT TRUE. Chelan County organized and created the Stemilt Partnership in 2007 to prevent urban development in the upper Stemilt Basin. The DEIS should be revised to clarify that proposed urban development in the upper basin is in direct conflict with the formative goal and core belief of the Stemilt Partnership.

The DEIS claims that the project is consistent with the Chelan County Comprehensive Plan, the Stemilt-Squilchuck Recreation Plan, the Stemilt-Squilchuck Community Vision Report, the WRIA 40A Watershed Plan, and the Master Plan Resorts Overlay requirements. However, in each case, the DEIS cherry picks specific examples where the proposal agrees with a specific plan goal or policy, and claims agreement with the guiding document. Cherry picking and citing only those issues in agreement with the plan, while ignoring the overall intent and major policies of each document is dishonest. Because the DEIS discussion on the above topics is misleading and

persuasive, the entire section should be revised to appropriately compare the effects of the project against the major stated goals of these guiding community documents.

4.4.3.2 Land and Shoreline Use - Impacts from Operation - Chelan County Zoning: Master Plan Resorts Overlay District (MPR): The DEIS states that "... the project is generally consistent with the MPR standards..." However, the project is not consistent with MPR standards. Chelan County Code Chapter 11.89.010 - Purpose 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 shows that this project creates significant adverse effects on natural and environmental features. Therefore does not meet the very first Chelan County code requirement for MPRs.

In addition, CCC 11.89.040(4) 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." AND "...all property owners shall submit a joint application." This application clearly does not meet these requirements as the multiple tracts of land included in the application are subject to a convoluted system of control and ownership, involving USFS, WDFW, and the applicant. USFS and

WDFW did not submit a joint application with the applicant here.

In addition, CCC 11.89.040(3) provides that "[m]aster planned resorts shall not be located on lands designated as agricultural or forest lands of long-term commercial significance unless a finding is made that the land is better suited, and has more long-term importance, for the MPR than for the commercial harvesting of timber or agricultural production." There are 129 acres of land included in the MPR that are "designated as agricultural or forest lands of long-term commercial significance." The DEIS does not even attempt to demonstrate that this land "is better suited, and has more long-term importance, for the MPR than for the commercial harvesting of timber or agricultural production." Regardless of whether those forests are conserved, they are being removed from eligibility for commercial harvesting and the applicant needs to establish that those 129 acres are better suited and more important for the MPR than for commercial harvesting.

Further the Comprehensive Plan defines MPRs to be self-contained destination resorts and consist of short-term visitor accommodation, provide affordable housing for employees, preserve the rural character or natural resource used, and single family or multi-family development must not be the primary components of MPRs. The proposed development violates all of these requirements: **The development is not primarily a**

destination resort. The development is not self-contained. The development does not consist of short term visitor accommodations. The development does not consider affordable employee housing. The development does not preserve the rural character or natural resource it uses. The development clearly does not satisfy the intent or rules of an MPR. The DEIS should be updated to honestly compare the proposal to the requirements of an MPR and recommend against approval of an MPR overlay zone.

4.4.3.2 Land and Shoreline Use - Impacts from Operation - Critical Areas: CCC Chapter 11.77 requires that projects containing critical areas conduct a critical areas report and avoid, then mitigate, all impacts to critical areas. And Chapter 11.78 requires that projects containing fish and wildlife habitat conservation areas prepare a habitat management and mitigation plan. The DEIS confirms that the project site includes multiple categories of critical areas as well as fish and wildlife habitat conservation areas. However, the DEIS proposes to establish compliance with these provisions at a later date, sometime before beginning construction. This is not acceptable. Both CCC Chapter 11.77 and 11.78 contemplate these requirements being met at the time of an initial land use application. The DEIS should be revised to acknowledge that before the County can approve any element of this project, including establishing the MPR overlay, the applicant must demonstrate

compliance with these provisions.

Operation - Recreation: The DEIS claims "The proposed project would likely make it easier for recreationists to access surrounding public lands." This is not true for users of the Lake Clara trail, who will have to park further from the trailhead when the new driveway road eliminates the Lake Clara trailhead parking area. And it is not true for winter recreationalists whose route between the Mission Ridge parking lot and the upper Stemilt basin will be blocked by a new chairlift and SUP area expansion. The DEIS should be revised to examine the negative effects of the plan in addition to noting potential positives.

4.4.3.2 Land and Shoreline Use - Impacts from Operation - Land Use and Potential for Future Growth: The DEIS claims that "The increased capacity provided by improved roadways and utilities could accommodate growth beyond the proposed project area." Chelan County Code section 11.89.040 General Requirements requires that any capacity increases generated by the development do not promote sprawl or urban level of development adjacent to the MPR. The DEIS should be revised to investigate the potential sprawl enabled by the project and discuss this conflict with County Code.

4.4.3.2 Land and Shoreline Use - Impacts from Operation - Land Use and Restrictions on Future Land Use in Study Area: Mission Ridge has a history of limiting or denying travel, hunting, camping, dogs, snowmobile and other motorized access, drone use, and parking on public lands within their special use permit area. This behavior can be expected to continue. Extending the boundaries of the ski area's special use permit will effectively eliminate access to public lands in the expanded Special Use Permit area. The DEIS should be revised to examine the negative effects of the plan on future use within the expanded Special Use Permit area.

4.4.3.2 Land and Shoreline Use - Impacts from Operation - Project Area Character: The DEIS lists potential changes in the rural character of the upper Squilchuck and Stemilt basins and then dismisses these concerns. The DEIS should be revised to seriously assess and discuss the changes in character to the rural nature of the upper Squilchuck and Stemilt basins.

4.4.3.3 Land and Shoreline Use - Proposed Mitigation Measures - MPR: The DEIS includes as land use mitigation measures the following: "Compliance with all Chelan County code requirements for MPR development." However, the project does not comply with Chelan County Code requirements for MPR development. See Section 4.4.3.2, Impacts from Operation for a discussion on MPR compliance. The

DEIS should be revised to eliminate citation of compliance with MPR requirements as a mitigation measure.

4.4.3.3 Land and Shoreline Use - Proposed Mitigation Measures - Compliance: The DEIS includes as land use mitigation measures the following: "Compliance with all permit requirements and conditions imposed by Chelan County, USFS, and other agencies". The developer has demonstrated non-compliance with permit requirements imposed by regulatory agencies. Two examples include Violations of the Special Use Permit LEA410104, and ignoring all USFS requirements for construction of a temporary road that roughly follows the proposed driveway alignment to the development. It is insincere to cite expected compliance as mitigation, when current behavior is out of compliance. Since the developer has demonstrated an inability to comply with permit requirements, the DEIS should be revised to examine current and expected behavior, and discuss specific mitigation requirements that can be enforced and verified.

4.4.4 Land and Shoreline Use - Significant and Unavoidable Adverse Impacts: The DEIS lists no significant and unavoidable adverse impacts and asserts land use impacts would be reduced through mitigation. The proposed project is not consistent with Chelan County guiding documents, causes significant conflicts with surrounding land uses and creates many significant and unavoidable adverse impacts. **The**

DEIS should be revised to include a list of significant and unavoidable adverse impacts as described in chapter 4.4 and as expanded through public comments.

5.1 Air: The DEIS claims there are no impacts on air quality. The DEIS does not explore the health impacts of increased air pollution along the roadway caused by the traffic associated with the proposed development. Residents who live along the Squilchuck and Mission Ridge roads currently enjoy mostly clean air with occasional unpleasant smells related to traffic. Specifically, some vehicles traveling downhill from Mission Ridge to Wenatchee ride their brakes enough to create an unpleasant hot brake smell that lingers for several minutes after they pass. In the proposed condition, if only 1 in 25 cars rides their brakes, the smell will be constant with no clean fresh air breaks. This is an unavoidable impact, and to the residents who live along Squilchuck and Mission Ridge road, this will be a significant impact. The DEIS should be revised to study the indirect impacts from Construction and Operation on air quality related to increased vehicle traffic, and if the revised DEIS finds that the impacts are unavoidable and significant, then Section 5.1 - Air should be relocated from chapter 5 of the DEIS to chapter 4.

5.2 Groundwater - Water Quantity: The DEIS describes using on-site groundwater wells as the exclusive source of potable water until eventually

being forced to transition to PUD water. By this strategy, all of phase 1 and about half of phase 2 could be built without a connection to the PUD water system. If this is allowed, and the developer stops construction without connecting to the PUD water system, then the impact to the Squilchuck basin is a net additional withdrawal of 240 acre-feet per year. The DEIS argues that at full-buildout, imported PUD water will eliminate any net negative water quantity impact, and therefore, there are no significant adverse construction or operation related impacts on groundwater quantity from the proposed project. This is not true for the situation where full-buildout is not achieved. Considering only the full-buildout condition for assessment of adverse impacts is inadequate. The partial complete condition of the project could last between 20 years and forever. The DEIS should be revised to study the impacts during the early phases of the project if water is withdrawn from the aquifer and before imported PUD water balances the net negative water quantity effects. The conclusion that there are no probable significant adverse construction or operation impacts should be revised to acknowledge the adverse impacts during early phases caused by removing water from an already overallocated water budget.

5.2 Groundwater - Water Quality: The wastewater strategy described in the DEIS is to use individual or group on-site septic systems that discharge through

drainfields to groundwater for the early phases of the project, and eventually, if needed, install a centralized municipal wastewater treatment plant (WWTP) that would discharge to surface waters. However, the DEIS describes that it is unknown how much space will be required for drainfields, or whether the soils are even suitable for drainfields. "The Applicant is prepared to pivot to surface treatment and discharge through an NPDES permit if soils are not suitable." The DEIS discusses that in 1986 an FEIS study determined that a WWTP could not be built because the flow in Squilchuck Creek was too small to meet the minimum dilution criteria, but that advances in technology suggest that "previous SEPA findings related to wastewater treatment at this site are due for reconsideration..." Despite no assurance that either suggested wastewater treatment strategy is workable, the DEIS concludes that "there would not be probable significant adverse operation-related impacts on groundwater quality from the Proposed Project."This conclusion does not follow the arguments. There has been insufficient study to know whether soils are even suitable for on-site septic systems, and the backup WWTP strategy, which was ruled out in 1986, is "due for reconsideration". This level of study is inadequate to make any informed decision about the appropriateness of either system. Soil studies should be completed to allow preliminary design and layout of septic drainfields to verify whether adequate soils or space even exists. Preliminary

design of the WWTP needs to be completed to the level at which it can be determined whether a WWTP is a workable wastewater treatment solution at the site. The site plans should show the location of the two solutions including general drainfield locations, WWTP location, and discharge to Squilchuck Creek location. In addition, domestic water use introduces pharmaceuticals, PFAS, and viruses to effluent which will contaminate the currently pristine Squilchuck Creek. The DEIS should be revised to clarify that a WWTP will be required, to include studies for drainfield soils appropriateness, size and layout, and to include a WAC 173-150-060 compliant engineering report for WWTP appropriateness, location, and cost. The DEIS should be revised to acknowledge the pharmaceuticals, PFAS, and virus contamination to Squilchuck Creek from domestic effluent and to assess the impact on the watershed for irrigation and drinking water. The DEIS should be revised to clarify that the WWTP must be bonded at 150% of the estimated cost.

5.2 Groundwater - Water supplies/rights: The DEIS describes 240 acre-feet of new withdrawal of groundwater in-perpetuity at the development but argues that: "Full use of the Applicant's existing right is already authorized and cannot impair other existing rights." This is an insincere legal argument that ignores the actual physical impact to senior water rights holders downstream of the development. The downstream users have priority by date and are

currently not receiving full distribution of their adjudicated water. Removing additional water beyond what has historically been removed will further impair their rights and is not acceptable. The DEIS states "The Applicant has stated there would be no enlargement of existing water rights, meaning that the quantity of water that is already authorized and being put to use would remain the same. This is a requirement of state law." However, the DEIS fails to recognize that new domestic withdrawal and expanded snowmaking will require using authorized rights that have not been put to use and are therefore no longer valid. This water has never been removed from the system, and to start now would be a new withdrawal that would affect stream flow and reduce the already curtailed rights of downstream irrigators. The DEIS should be revised to recognize that new withdrawals on previously authorized quantities which have not been put to use, will have a significant negative impact on senior water rights holders downstream of the development.

5.2.4 Groundwater - Significant and Unavoidable
Adverse Impacts: The DEIS states: "...there would be
no significant and unavoidable adverse impacts
related to groundwater from construction or operation
of the Proposed Project." However, new withdrawals
from the headwaters of the Squilchuck drainage will
negatively affect streamflow quantity and the ability of
senior water rights holders to fulfill their rights. **The**

DEIS should be revised to recognize that new withdrawals on previously authorized quantities which have not been put to use, will have a significant negative impact on creek flow and on senior water rights holders downstream of the development.

5.3.1 Surface Water Conditions: Lake Creek is not included in the Project Area Surface Water Summary. The DEIS should be revised to include Lake Creek in the Project Area Surface Water Summary. Lake Creek should be designated as a fish bearing perennial stream. If field studies are necessary for designation as a fish bearing stream, then those studies should be included in the DEIS process.

Construction - Riparian habitat: The DEIS omits impacts to perennial fish-bearing Lake Creek at the existing Mission Ridge parking lot, and impacts to Squilchuck Creek along the first portion of the driveway access road as it exits the Mission Ridge parking lot, where the road is within 200 feet of Squilchuck Creek. The DEIS should be revised to include preliminary design of the access road in order to determine what sections of the road encroach into the 200' buffer around Squilchuck Creek, and to include impacts to perennial fishbearing Lake Creek at the Mission Ridge parking lot.

5.3.3.1 Surface Water - Direct Impacts from

Construction - Riparian habitat - Streamflow/water quantity: The DEIS claims that streamflow impacts are minimal in part because "No surface water diversions would be used for construction water supply."

Suggesting that surface water flows will not be affected because the project doesn't plan to use surface water diversions is dishonest. This is an insincere argument because the project will use 90 acre-feet of new net withdrawal of groundwater for construction related activity and "...deep bedrock fractures appear to be in hydraulic continuity with the surface waters near the ski area...". Therefore, streamflow will be impacted. The DEIS should be revised to remove the dishonest suggestion that streamflow impacts are minimal.

5.3.3.1 Surface Water - Direct Impacts from Construction - Riparian habitat - Water Supply/Rights: The DEIS claims that new groundwater withdrawals would not impact downstream water supply or water rights. This is not true and is discussed thoroughly in section 5.2 Water Quantity. The DEIS should be revised to acknowledge the adverse impact during construction and during the early phases of the project caused by removing water from an already overallocated water budget. If groundwater is removed, then this is an unavoidable significant impact and therefore Section 5.3 Surface Water should be relocated from Chapter 5 to Chapter 4.

5.4 - Plants and Animals - Habitat Maps: The habitat

maps referenced by the DEIS (Figures 5.4.2,3,5,6,7) contain inaccuracies that result in incorrect conclusions throughout the Plants and Animals chapter. These maps should be updated with the best available science. Accurate elk and mule deer wintering, fawning and calving on the project area, elk summer use of the project area, extent of invasive weeds, eastside old growth forests, and PHS snags and logs should all be updated on these maps. The DEIS should be revised to include the updated and revised habitat maps and all decisions based on these maps should be revisited and revised as informed by the updated information.

5.4.1 - Plants and Animals Overview - Pika and Wolverine: The DEIS presents plants and animals with special status in Table 5.4-1: Terrestrial Special Status Species and Habitats that Potentially Occur Near the Study Area. However, this table omits American Pika and wolverine (gulo gulo), which both have special status and occur near the study area. The DEIS should be revised to include American pika and wolverine in Table 5.4-1: Terrestrial Special Status Species and Habitats that Potentially Occur Near the Study Area.

5.4.1 - Plants and Animals Overview - Aquatic Plants and Animals: The DEIS omits a wetland near the loading area of the proposed chairlifts in Section 19 and a perennial non-fish bearing stream that originates on Section 30 near the proposed reservoir. These

water bodies are also missing from *Figure 5.3-3* "Surface Waters and Proposed Development". The DEIS should be revised to map and assess these missing water bodies.

5.4.1 - Plants and Animals Overview - Fish Species:
The DEIS suggests that there could be three state priority species of fish using Squilchuck Creek including rainbow trout, west slope cutthroat trout, and mountain sucker, but admits that their presence is unconfirmed. Knowing whether these species are present at the project site is critical to the discussion of impacts and mitigation. An electro-shocking or E-DNA survey should be completed to identify or rule out the presence of these species. The DEIS should be revised to remove speculation about the presence of State Priority Species of native fish by completing a study and reporting the results along with impacts and mitigation.

5.4.3.1 Plants and Animals - Impacts from
Construction - Commonly Occurring Terrestrial
Animals - Suitable Habitat: The DEIS suggests without
evidence that adjacent lands can replace the function
of the areas disturbed by the proposed development.
"These adjacent lands contain potentially suitable
habitat and migration corridors (e.g., riparian corridors)
that are similar to habitats in the study area." AND
"...relatively abundant supporting habitat will remain in
adjacent areas." This is not true. This suggests that
the damage to plants and animals created by the

proposed development simply takes a bite out of a much larger and homogeneous landscape. The habitat interrupted by the project is unique and irreplaceable. It is a heavily used migration corridor consisting of critical wildlife habitat including travel corridors, feeding area, bedding areas, fawn and calving zones, and ungulate breeding habitat. The area contains a diverse range of habitats including cool north-facing slopes, mature forests with complex horizontal structure and closed overhead canopy, old-growth forests interspersed with open grassy meadows, shrub steppe, springs, cliffs, talus, and aspen groves. The diversity of habitats allows for a diversity of wildlife species. For ungulates and larger mammals in particular, the abundance of talus fields (and cliffs) creates a barrier. Most large animals avoid traveling through the loose talus and seek firmer footing to avoid the cattle-guard-like danger of talus. The DEIS should be revised to remove unjustified statements declaring adjacent lands can replace the function of the areas disturbed by the proposed development.

5.4.3.1 Plants and Animals - Impacts from Construction - Commonly Occurring Terrestrial Animals - Talus: The DEIS acknowledges that talus is habitat for ectotherms: "Typical habitat for ectotherms (species that use their environment to regulate their body temperatures) includes exposed rocky areas and talus...". The talus within the project area is also used by American Pika. Most of the talus fields in Section

19 appear to be scheduled for grading and removal. This habitat destruction is not discussed and no mitigation is offered. The DEIS should be revised to acknowledge that most of the talus field habitat in Section 19 will be destroyed and the impacts of this action should be assessed with mitigation offered.

5.4.3.1 Plants and Animals - Impacts from Construction - Commonly Occurring Terrestrial Animals - Amphibians: The DEIS suggests that due to the limited areas of aquatic habitat, "...the Proposed Project is likely to have fewer impacts on amphibians relative to other animal groups." However, there are perennial streams, wetlands, and riparian areas throughout the project area. Two section 19 wetlands are scheduled to be filled. These wetlands are known amphibian breeding grounds. Western toads and spotted frogs have been seen nearby and may be using these features. The DEIS wetland assessments are not accurate as they miss both a key wetland in the center of the section 19 development, and a perennial stream. Both may be impacted by construction activities. The DEIS should be revised to include a better wetland assessment to accurately account for these missing waterbodies in order that the impacts from destroying these waterbodies can be assessed. In addition, an amphibian survey needs to be completed during the breeding season in order to confirm or rule out

the presence of western toads and spotted frogs.

5.4.3.1 Plants and Animals - Impacts from Construction - Commonly Occurring Terrestrial Animals - Summary: The DEIS summarizes the impacts on terrestrial animals without acknowledging any significance. "Overall, construction impacts on commonly occurring terrestrial animal species are expected to occur. However, as noted previously, many animals will leave the construction area to avoid the disturbance and occupy similar adjacent habitats, which are relatively abundant in the study area and surrounding lands." There is no evidence that similar, abundant habitats exist in adjacent lands. The DEIS wildlife maps show that high quality elk habitat is limited in the area. The 2025 FOMR Trail Camera Survey shows that cool, timbered, north-facing slopes are rare on Mission Ridge. Most of these north-facing habitats are interrupted with roads and the proposed project area contains one of the last intact patches of undisturbed habitat in this upper elevation environment. Nearby Section 17 was recently converted from an open forest where wildlife could move freely, to a fenced off orchard. Taken cumulatively, this shrinking of habitat reduces the size of animal populations, reduces genetic diversity, and causes impediments to migration and adaptation in the face of climate change and other pressures. Reducing habitat decreases animal resiliency. The DEIS should be revised to acknowledge that habitat destruction has a significant impact and the assessment

should include cumulative impacts including habitat destruction on nearby lands.

5.4.3.1 Plants and Animals - Impacts from Construction - Commonly Occurring Terrestrial Animals - Special Status Terrestrial Plants and Animals: Table 5.4-2 Potential Construction Impacts on Special Status Terrestrial Species and Habitats contains inaccuracies or is missing information for Whitebark Pine, Cascade Red Fox:, Elk, Pika, Western Toad, Dusky and Sooty Grouse, Northern Goshawk, American Martin, Columbia Spotted Treefrog, Golden Eagles, Roosting Bat Colonies, Aspen, Old-growth Forest, Talus, and Migratory Birds.

The DEIS should be revised to:

- Study and assess the impacts and extent of the beetle kill on the upper-elevation whitebark pine
- Remove the unjustified claim that whitebark pine population impacts are minor.
- Confirm or rule out the presence of cascade fox in the project area.
- Include additional studies and the best available science in regards to impacts on elk near the project site.
- Include Pika.
- Confirm or rule out the presence of western toad such that appropriate mitigation can be discussed.
- Include additional grouse habitat discussion.

- Address the presence of goshawk on the project area.
- Consider American martin activity on the project area and provide serious mitigation discussion.
- Include breeding season studies of the project area wetlands to determine whether Colombian spotted treefrogs are using these habitats and determine appropriate compensatory mitigation for wetland destruction.
- Consider impacts to golden eagles by disturbance from the development.
- Conduct acoustic monitoring studies to determine talus use by roosting bats and consider impacts of destruction of that unique and preferred talus bat roosting and hibernating habitat.
- Correct the reported size and priority habitat designation of the aspen stand and determine whether aspen removal is significant.
- Include an inventory of old-growth forest on the project area and an assessment of the impacts of loss of old-growth forest habitats on Section 19 and 25.
- Include a discussion of impacts to talus residents which may include roosting bat colonies, pika, larch mountain salamanders. A study will be required to identify resident species.
- Consider the impacts on migratory birds from

light pollution, noise pollution and glass strikes from nearly 1000 new residential units plus commercial space and other buildings. The DEIS should offer mitigation strategies to compensate for these impacts.

5.4.3.1 Plants and Animals - Impacts from Construction - Summary of Impacts from Construction: The DEIS states that there would be no probable significant adverse construction-related impacts. This is not true. The DEIS should be revised to include and discuss the construction-related impacts listed above and collected through public comment. An incomplete list of these impacts includes: critical habitat loss, dispersion of elk to inferior migration and travel corridors with less valuable habitat, loss of whitebark pine endangering the entire Mission Ridge whitebark population, aspen grove priority habitat removal, destruction of old-growth forest, destruction of talus habitat, and introduction of glass strikes for migratory birds.

5.4.3.3 Plants and Animals - Permit-required Mitigation Measures: Item 7 of this section states: "Impact analyses relative to elk will apply the best available science as identified by WDFW, through the elk habitat model and recently completed literature review (Gaines et al. 2020).". Habitat models are theoretical and require ground truthing. The current habitat model

and literature review do not match the on-the-ground conditions found in the 2024-2025 Mission Ridge Trail Camera Survey and therefore do not represent the best available science. Additional ground study is required. The DEIS should be revised to update the elk habitat maps with the best available science.

5.4.4 Plants and Animals - Significant and **Unavoidable Adverse Impacts**: The DEIS claims "...there would be no significant and unavoidable adverse impacts on terrestrial and aquatic habitats and species from construction or operation of the Proposed *Project.*" This assessment is incomplete and false. The actual impacts from construction and operation were not fully examined in chapter 5.4. The goal of mitigation is no net loss of ecological function. To achieve this, the sequence is first to avoid impacts, if impacts can't be avoided, they must be minimized, and if there is no way to minimize the impacts, then compensation is required. This harm reduction sequence is rarely engaged in the Plants and Animals chapter of the DEIS. The document either minimizes, or fails to acknowledge impacts. The DEIS should be revised to include the additional studies discovered through the public comment process in order to correct erroneous information to provide an accurate assessment of the project's impacts. Once the impacts are understood, appropriate mitigation efforts can be proposed.

5.5 - Energy and Natural Resources:

5.5.4.1 Energy and Natural Resources - Direct Impacts from Construction - Open Space: The DEIS claims that the project increases public access to open space. However, extending the boundaries of the ski area's special use permit will effectively eliminate access to public lands in the expanded Special Use Permit area. This will also cut off access to recreationalists who currently use that area as a travel path from the Mission Ridge parking lot to the newly established winter non-motorized area in the upper Stemilt Basin. Unilaterally declaring that the project increases public access to open space is irresponsible. The DEIS should be revised to discuss negative effects on public access and this statement should either be corrected or deleted.

5.5.4.1 Energy and Natural Resources - Direct Impacts from Construction - Water and Forest Resources: The DEIS states: "Construction of the Proposed Project would have potential impacts to surface waters, including Squilchuck Creek and tributaries to Squilchuck and Stemilt creeks.", and then concludes: "Therefore, ... there would not be probable significant adverse construction-related impacts on forest and water resources from the Proposed Project." This is nonsensical. The DEIS should be revised to acknowledge the negative impacts to waters including the actual physical impact to senior water rights holders downstream of the development.

Section 5.2 Groundwater and section 5.3 Surface Water discuss the negative impacts caused during

construction and operation on the already overallocated water budget should the developer be allowed to remove water from the headwaters of the Squilchuck Basin. The DEIS should be revised to acknowledge the issues discussed in those sections and Section 5.5.4.1 should be updated to recognize these significant negative impacts.

5.5.4.3 Energy and Natural Resources - Direct Impacts from Operation - Energy Supply and Demand: The DEIS indicates that the proposed project intends to use power from the existing Squilchuck power lines until the capacity is completely used up. Once the existing capacity is used up, new power lines and a new substation will be required. However, the DEIS has no schedule for planning for PUD power improvements. The DEIS should be revised to clarify that the costs for any short term capacity improvements to allow power for project phases 1 and 2, and all costs associated with permitting, SEPA, design and construction of new power lines, substations and any other infrastructure associated with new capacity to power the development, must be borne by the development. The DEIS should be revised to discuss the impacts of potential significant construction delays caused by poor power planning.

5.6.3.1 Transportation - Direct Impacts from Construction - City of Wenatchee, Squilchuck Road

Corridor, Chelan PUD Easements - Road Design: The DEIS discusses construction of the proposed access road but provides no preliminary design for review. In order to justify the declared cut and fill heights, assess corridor disturbance area, and understand the magnitude of ground disturbance, the DEIS should be revised to include preliminary proposed access road design through the existing Mission Ridge Parking lot and across USFS land to the development. The design should include cut and fill volumes, where cut is proposed to be disposed of, layout across the Mission Ridge parking lot, and proposed alignment including turnouts.

5.6.3.1 Transportation - Direct Impacts from
Construction - City of Wenatchee, Squilchuck Road
Corridor, Chelan PUD Easements - Lake Creek Fish:
In the discussion of construction of the proposed
access road through the existing Mission Ridge
parking lot and across USFS land to the development,
the DEIS identifies Squilchuck Creek as fish bearing
but fails to identify Lake Creek as fish bearing. Lake
Creek bears fish. The DEIS should be revised to
acknowledge that Lake Creek is a fish-bearing
stream.

5.6.3.1 Transportation - Direct Impacts from
Construction - City of Wenatchee, Squilchuck Road
Corridor, Chelan PUD Easements - HPA
Requirements: Both Lake Creek and Squilchuck Creek
have been buried in culverts under the Mission Ridge

Parking lot. The project proposes to construct a County highway through the parking lot and across these streams. Culvert repair for fish bearing stream crossings must be in accordance with WAC 220-660-190 which requires "An HPA is required for all construction or repair/replacement of any structure that crosses a stream, river, or other water body regardless of the location of the proposed work relative to the OHWL of state waters". Since Lake Creek is a fish bearing stream, the DEIS should be revised to indicate that both stream crossings in the Mission Ridge parking lot will require an HPA.

5.6.3.3 Transportation - Direct Impacts from Operation -Traffic Impact Analysis - Pitcher/Squilchuck Mitigation: The TIA finds that the Pitcher Canyon/Squilchuck Road intersection will operate at level of service D which is below the minimum County standard, but recommends against mitigation. This recommendation is irresponsible and violates 2017-2037 Chelan County Comprehensive Plan goals including:

Goal 1.8 "...preserve the level of service and operations of the existing county road system" and Goal 1.9 "...deny approval of any development proposal that would cause a roadway segment to fall below the adopted minimum level of service..."

The DEIS proposes to violate Goal 1.8 by stating that decline in intersection level of service is acceptable. (The TIA shows that without the development, the intersection will be LOS A/B in 2034, but with the

development, it will be LOS D). The DEIS proposes to violate Goal 1.9 by proposing that even though the intersection LOS falls below the adopted minimum level of service, that mitigation should not be done. Mitigation is required. The DEIS should be revised to clarify that LOS D is unacceptable and that mitigation to the Pitcher Canyon/Squilchuck road is required and further that all mitigation must be complete or bonded prior to issuance of a single occupancy permit.

5.6.3.3 Direct Impacts from Operation -Traffic Impact Analysis - Mitigation Costs: The DEIS suggests that mitigation costs should be shared between Chelan County and the developer. In the baseline condition for 2034 (a future without the development), the TIA indicates that the Methow, Pitcher, and Wenatchee Heights intersections will operate at the current level of service conditions (LOS B) and require no improvements. It is only with the addition of the development that conditions deteriorate and mitigation is required. Since no mitigation would be needed without the development, all of the costs for the otherwise unnecessary intersection improvements should be borne by the developer. The DEIS should be revised to omit discussions of proportionate cost sharing and clarify that all required intersection improvement costs should be borne by the development.

<u>5.6.3.3 Transportation - Direct Impacts from Operation</u>

- Traffic Impact Analysis - Unstudied Intersections: The DEIS neglects to study intersections at Squilchuck and Kray Ike Court, Squilchuck and Saddlehorn Avenue, Squilchuck and Saddlehorn Lane, Squilchuck and Cranmer Road, Squilchuck and Halverson Canyon, Squilchuck and Lehman Road, Squilchuck and Hampton Canyon, Squilchuck and Squilchuck State Park, Mission Ridge Road and Forest Ridge Road, Mission Ridge Road and Beehive Reservoir Road and the intersection between the parking lot at Mission Ridge and the proposed new County road extension. The TIA should be revised to include study of all roads intersecting with Squilchuck and Mission Ridge Roads.

<u>5.6.3.3 Transportation - Direct Impacts from Operation - Squilchuck Road Corridor</u>: The DEIS presents two road capacity analysis approaches. These include an alternative v/c (volume over capacity) approach, and the traditional Highway Capacity Manual approach. The Kimley Horn traffic analysis is faulty for both methods.

v/c method:

Kimley Horn equates acceptable traffic levels on SR-97a (the highway between Wenatchee and Entiat) with acceptable traffic levels on Squilchuck and Mission Ridge Road, and directly compares traffic flows using SR-97a numbers to determine future Level of Service for Squilchuck Road. Clearly the Mission Ridge Road capacity is lower than SR97a's capacity. A direct comparison of vehicle flow on the Mission Ridge Road to Chelan County accepted LOS at various vehicle flow rates on SR-97a is meaningless.

Highway Capacity Manual method:

The HCM method determines percent-time-spent-following (PTSF) at the flow rates predicted by Kimley Horn. The HCM provides a table for determining expected level of service (LOS) based on PTSF. If the highway meets base conditions, then PTSF can be directly read from a chart. However, the Mission Ridge Road does not meet base conditions because no passing is possible. When the highway does not meet base conditions, the HCM offers a more complex method of converting vehicles-per-hour to PTSF with a formula that considers an adjustment for no-passing-zones.

The Kimley Horn analysis inappropriately assumes base conditions and uses the simple chart to determine PTSF. The results presented in the 2025 TIA are meaningless as they assume the ability to pass in the opposing lane where this is not possible on the Mission Ridge Road. Appropriate analysis shows LOS D for weekday traffic in 2034 (post phase 3) which is unacceptable. Mitigation is required but is not identified in the DEIS. For context, the TIA predicted new trips generated from the development are about twice the WSDOT traffic count for 2024 annual average daily traffic on both Stevens Pass near Yodelin and on Hwy 97 Blewit Pass. **The DEIS should**

be revised to include an updated TIA that utilizes appropriate calculation methods to determine LOS. When the updated report indicates for all 2034 cases that LOS falls below C, then appropriate mitigation should be required. The costs for this mitigation should be borne by the development.

5.6.3.3 Transportation - Direct Impacts from Operation - New Public Access Road: The new public access road is proposed to be 28 feet wide. As discussed in the section above, the existing 28 foot wide Mission Ridge Road is inadequate to support projected traffic within the minimum adopted rural level of service set by Chelan County. The Transportation Element of the 2017-2037 Chelan County Comprehensive Plan, requires that new roads include non-motorized travel and preserve the level of service and operations of the existing county road system. Therefore, the new road needs to be designed to accommodate biking and walking and to operate at LOS B minimum. The DEIS should be revised to provide preliminary design of the proposed access road in accordance with **Chapter 15 of the 6th edition of the Highway** Capacity Manual to demonstrate LOS B under full buildout conditions with both bike and walk safe routes along the road between the development and the ski area. To achieve this level of service, passing lanes or multiple lanes in each direction may be required. The incorrect and persuasive reference to a single "wider" road should be

deleted throughout the DEIS unless the developer chooses to construct the road wider than the HCM design dictates.

5.6.3.3 Transportation - Direct Impacts from Operation - Summary of Impacts from Operation: The DEIS states that "...there would not be probable significant adverse operation-related impacts on transportation..." This is not true. Even with the faulty analysis in the TIA, level of service on Mission Ridge Road is shown to fall below LOS C and no mitigation is offered. The construction effort required to mitigate the Squilchuck and Mission Ridge Roads will be enormous. The road will need to be widened with the addition of turning lanes and passing lanes. The terrain is steep and complex and room to widen the road may not be available. Mitigation may not just be expensive, but it could be impossible. The impacts to traffic from operation of this development are both significant and unavoidable. The DEIS should be revised to list and discuss the impacts from operation.

5.6.3.5 Transportation - Proposed Mitigation
Measures: The DEIS suggests that "...installation of
compact roundabouts at Okanogan Avenue at
Crawford Avenue and S. Miller Street at Crawford
Avenue intersections will be completed prior to the
completion of Phase 3." and that additional mitigation
may be required based on a future traffic study to
include all 5 phases. "The supplemental TIA will

include new traffic counts, updated trip generation and distribution, and additional required mitigation measures as appropriate based on the updated assessment of project-related traffic impacts. Mitigation measures would be based on the cumulative transportation impacts of the development (Phases 1-5)" Delaying mitigation until after phase 3 is complete puts the community at risk. It is entirely possible that the developer could complete phases 1, 2, and 3, and then decide that the mitigation cost to complete the final phases is too costly or not worth his effort. In that case, the community would be stuck with below acceptable level intersections and roads, and without any mitigation contribution from the developer. The TIA should be revised to require that all anticipated mitigation for all phases should be required prior to the issuance of any certificate of occupancy. The full cost should be paid by the developer or guaranteed by performance bonds of 150% the estimated cost of the mitigation.

5.6.4 Transportation - Significant and Unavoidable Adverse Impacts: The DEIS claims that: "...there would be no significant and unavoidable adverse impacts related to transportation from construction or operation of the Proposed Project". However, If the project is constructed with only the mitigation recommended herein, a county highway will be constructed over fish-bearing streams, several intersections will become "unacceptable" according to County standards, and the Squilchuck Road will degrade from free-flowing

rural to freeway-like traffic. These impacts are significant. The increased traffic on Squilchuck road is unavoidable. The DEIS should be revised to require appropriate mitigation, and to recognize that the transformation of the Squilchuck valley from rural, to an urban development access corridor with 10,000 daily car trips to and from the development, is a significant and unavoidable adverse impact. The DEIS should move Section 5.6 Transportation from Chapter 5 to Chapter 4.

5.7.1 Utilities and Public Services Overview - Water Service: The DEIS states that "Potable water at Mission Ridge is currently sourced from on-site groundwater wells located at the Base Area." This assertion is true, but the action may not be legal. Mission Ridge has a permit for domestic water withdrawal from October 1 through May 1. The DEIS should verify that legal permission to remove water in the summer months exists.

5.7.1 Utilities/Public Services Overview - Power Service: The DEIS states that "Chelan PUD has short-term projects that are intended to make approximately 2.0 mW available to support organic growth and potentially the first phase or two of the Applicant's proposal." It is not clear that the development will be paying for these short-term projects. The DEIS should be revised to clarify that the cost of all public service extensions and capacity increases must be borne by the developer.

5.7.1 Utilities/Public Services Overview -

Telecommunication Service: The DEIS states that the PUD fiberoptic network will need to be extended from Forest Ridge to the project area. It is not clear that the development will be paying for the fiberoptic line extension. The DEIS should be revised to clarify that the cost of the fiberoptic line extension must be borne by the developer.

5.7.1 Utilities/Public Services Overview - Fire/basic life support (BLS)/police: The DEIS discusses a new fire station but it is not clear that the development will be paying for the fire station. The DEIS should be revised to clarify that the cost of the new fire station must be borne by the developer.

5.7.1 Utilities/Public Services Overview - Schools: The DEIS discusses the development's student population, student pedestrian safety, and the capacity of the Wenatchee public schools to serve these new students. Residential development is allowed in a Master Planned Development only if such use will "support the on-site recreational nature of the master planned resort." School kids playing in the development roads and school buses traveling in and out of the development and down Squilchuck Road certainly do not support the on-site recreational nature of the master planned resort. The DEIS should be revised to acknowledge that full-time permanent residents of the development that work in Wenatchee, and whose kids live at the

development and go to school in Wenatchee, do not support the recreational nature of the resort and thus conflict with approval criteria in Chelan County Code for MPR status.

5.7.3.3 Utilities/Public Services - Direct Impacts from Operation: The DEIS discusses Water Service, Power Service, Sewer Service, and Fire/basic life support(BLS)/police. These issues are discussed in Section 5.2 Groundwater, Section 5.3 Surface Water, Section 2.6.2 Alternatives Considered but Eliminated -Integrated Power Planning, and Section 4.2.1 Fire Risk Overview. Referring to the arguments in those sections, the DEIS should be revised to acknowledge the adverse impacts during early phases caused by removing water from an already overallocated water budget. The DEIS should be revised to clarify that the cost of all public service extensions and capacity increases must be borne by the developer and that improvements must be installed or bonded prior to occupancy. This includes SEPA study costs, new substation cost, power line improvements, and all costs associated with power capacity increase to accommodate the development. The DEIS should be revised to clarify that consultation with Chelan County Fire District is required and all costs for new service extension and capacity increase, including a new fire station and all apparatus required for that station, shall be borne by the development, and that these improvements must be in place and in

operation before a single occupancy permit is issued.

5.8.1 Noise - Noise Overview: The DEIS claims that the nearest neighborhood to the project is over three miles away. This is not correct. The nearest Forest Ridge homes are roughly 0.4 miles from the development homes. The DEIS should be revised to correct the proximity of Forest Ridge to the project from "more than 3 miles" to roughly 0.4 miles. The sound discussions should be updated to reflect the correct 2100 feet as opposed to the incorrect 15,000 feet.

5.8.3.1 Noise - Direct Impacts from Construction: The DEIS refers to construction related excess noise as "short term", "temporary", and "limited in duration". These are insincere descriptors for a project expected to last 20 years. It claims that the noise impact at Forest Ridge would be similar to the sound of a soft whisper, and the DEIS claims that the noise levels from construction would not exceed the maximum permissible environmental noise levels allowed by WAC 173-60-040. These assertions are based on the incorrect assumed distance of 15,000 feet as opposed to the correct distance of 2100 feet and are both in error. The DEIS mentions that birds and mammals. may be disturbed or displaced due to the construction noise, but dismisses the noise impact due to its "temporary" nature. The DEIS should be revised to correct the sensitive receptors proximity error,

conduct actual sound level calculations to determine actual effects, and eliminate language that downplays construction related noise effects simply because they are "temporary". A 20 year temporary duration will feel permanent to the affected birds, animals, and residents of the upper Squilchuck valley.

5.8.3.3 Noise - Direct Impacts from Operation: The premise of the operational argument in the DEIS is that Forest Ridge residences are more than 3 miles away. This premise is off by a factor of 7. The nearest homes are only 0.4 miles away from the project. An analysis of noise levels should be performed using the correct distances and the conclusions herein should be updated. The DEIS downplays the increased noise levels due to traffic by arbitrarily declaring the extra traffic noise to be moderate, and by alluding to a gradual increase due to the 20 year construction period. The current soundscape for residents of the Squilchuck Valley who live along the Squilchuck or Mission Ridge road is a quiet rural setting with occasional traffic noise. Along Squilchuck creek, residents can hear frogs croaking, birds singing, wind in the trees, and rain on the roof. The proposed soundscape during peak-hour traffic is a constant freeway-like din, with a car in each direction every 3.6 seconds which will drown out natural sounds, and possibly drive away birds and mammals. Saturday traffic increases by a factor of 2.12 after just phase one. Double the traffic! This is not a slow increase to

traffic volumes. This is a doubling of traffic in just the first phase of the project. These impacts are significant, permanent and unavoidable. The DEIS should be revised to analyse noise impacts using the correct distances between the project and the nearest homes. The DEIS should be revised to discuss the impacts of traffic noise on residents living on Squilchuck and Mission Ridge road and on wildlife that will be affected by increased noise. The misleading language alluding to a slow increase in traffic should be deleted in light of the rapid doubling of traffic on Squilchuck Road after just phase one of the project. Because these impacts are significant and unavoidable, The DEIS should move Section 5.8 - Noise from Chapter 5 to Chapter 4.

5.9 - Cultural Resources: The DEIS cites previous archaeological studies in the vicinity of the project, some of which partially overlap with the project. The DEIS appears to indicate that no current specific dedicated archaeological studies were prepared for this project. The DEIS should be revised to include current dedicated archaeological studies specific to this project and covering the disturbed grounds of this proposal.

5.10 - Recreation:

5.10.3.1 Recreation - Impacts from Construction - Access to existing recreation areas: The DEIS acknowledges that the project will impact trailhead

access to the popular Lake Clara trail, and suggests that parking a mile away at the remote development is an acceptable alternative. The trail to Lake Clara is only 1.5 miles in length. To suggest that moving the trailhead parking a mile from the trailhead, for a 1.5 mile hike, is not a realistic alternative. The project site plans do not show the extension of the County Road through the Mission Ridge parking lot and do not indicate how trailhead parking will be configured. The DEIS should be revised to include a more comprehensive picture of the final proposed trailhead condition and discussion and mitigation for interruption of trailhead parking.

5.10.3.1 Recreation - Impacts from Construction -Quality of recreation amenities: The DEIS acknowledges that construction activity will affect the quality of visitor experience, persist over a long time, affect wildlife, and degrade people's experience in nature. The DEIS explains that because of this decreased quality of recreation experience, users will choose to go elsewhere. The DEIS then concludes that "Because the changes in quality would be transitory and most visitors appear willing to substitute to other locations, recreation impacts would be minor." This conclusion is arbitrary and wrong. Given that the "transitory" nature of the project is actually a 20 year duration, the idea that people can just go elsewhere to recreate is insulting. This is not a minor impact. This is significant enough that the DEIS envisions recreationalists abandoning the area. The DEIS

should be revised to provide an honest assessment of the diminished recreation quality due to construction activity.

5.10.3.2 Recreation - Impacts from Operation - Availability of recreation amenities: The DEIS acknowledges that backcountry skiers will have to travel further or ski elsewhere in the region because of the changes to access caused by the development, but arbitrarily declares this impact minor due to the unrelated recreation created by the development. This conclusion is arbitrary and wrong. In addition to having to travel further to reach backcountry ski terrain, the recreational quality of the Stemilt and Clara basins on both sides of the ski area will be degraded by crowding. The DEIS concludes:

"Therefore, the project would benefit recreation users by increasing the overall supply of recreation amenities in the area due to the introduction of new recreation facilities during winter and expanding park operations into summer seasons without impacting the supply of recreation amenities in surrounding areas. There would not be probable significant adverse operation-related impacts on recreation from the Proposed Project."

This conclusion is also wrong. A small user group of lift access skiers and wealthy development residents will benefit from the recreation environment of the project. However, local skiers will be negatively impacted by

new crowding on the hill and in lift lines, and recreation amenities in surrounding areas will be degraded for all other user groups. The DEIS should be revised to discuss the recreational user groups that will be negatively affected by the crowding and loss of access to areas currently being enjoyed by diverse recreationalists.

5.10.3.2 Recreation - Impacts from Operation - Access to existing recreation areas: This section of the DEIS is poorly written, misleading and persuasive. The DEIS suggests that the development "could increase traffic" which is dishonest because the TIA attached to the DEIS as appendix I estimates roughly 10,000 new trips per day to and from the development. Could implies might. The TIA indicates that it WILL. The DEIS suggests that increased traffic will reduce parking availability at trailheads, but that intersection improvements will address any impacts at recreation facilities. This is nonsense. Additional traffic potentially causing extra demand on trailhead parking is not mitigated by intersection improvements. The DEIS states "Impacts to parking availability at trailheads would likely be minimal compared to current use patterns during most of the recreation season." This is arbitrary and wrong. 4000 people living within a mile of the Lake Clara trailhead will increase use of the Lake Clara trail. A study of the probable impact is warranted. Declaring without argument or evidence that impacts would be minimal is persuasive writing that does not belong in a scientific document. The

summary of impacts states: "...there would not have significant adverse operation-related impacts on existing recreation areas, the quality of recreation amenities, or the availability of recreation amenities recreation from the Proposed Project." This conclusion is incomplete and wrong. Squilchuck State Park impacts have not been discussed or analyzed in this document nor have other popular recreation sites including Beehive Reservoir, Mission Peak, Beehive-Liberty Road which is part of the The Washington Backcountry Discovery Route, Stemilt Basin, or Naneum Ridge. The DEIS should be revised. The Access to existing recreation areas section of chapter 10.3.2 should be completely reworked. The section should identify the recreation areas impacted by the development, assess the impacts to those areas, and provide an honest report of the negative impacts that are probable at those sites.

5.10.3.2 Recreation - Impacts from Operation - Quality of recreation amenities: This section of the DEIS is poorly written, misleading and persuasive. The DEIS argues that new lifts benefit recreation participants. However, the only recreationalists who benefit from ski lift operation are ski area lift skiers. This section of the DEIS is myopic to the paying guests of the resort and discounts the snowshoers, backcountry skiers, campers, bird watchers, hikers, trail runners, hunters, anglers, horsemen, and every other dispersed

recreationalist who benefits from access to the public land that this resort interrupts. The DEIS claims the new lifts will decrease the time it takes to get back to the top of the mountain. This is misleading and wrong. Chairs 2, 3, and 4, which access higher elevations at the ski resort, are remote from the development and its chairlifts' high points. The DEIS claims that the new lifts will reduce congestion. This is untrue. The increase in capacity occurs in the parking lots which are proposed to have parking for 5500 people. Chairs 1, 2, 3, and 4, which are the only chairs that elevate skiers in the actual Mission Ridge basin and ski area, will have no additional uphill capacity as no improvements are scheduled. The new chairs service only the low elevation runs above the development and do not provide meaningful ski area expansion. The future condition with the development includes roughly 2000 more skiers than now, with zero uphill capacity improvements in the ski area. This means that congestion on the runs will increase and lift lines will be longer. More crowding on the same lifts in the ski area does not improve the recreational experience. The project may benefit a small subset of recreation users, that subset being beginner lift access downhill skiers. However, the project disturbs and displaces all other recreation groups that currently enjoy the quiet, rural, easily accessible public lands of the upper Squilchuck and Stemilt basins as well as the local lift skiers who currently enjoy short lift lines and relatively uncrowded ski runs. The DEIS should be revised.

The Quality of recreation amenities section of chapter 10.3.2 should be completely reworked. The section should identify the recreation amenities impacted by the development, assess the impacts to those areas, and provide an honest report of the negative impacts that are probable at those sites.

<u>5.10.3.3 Recreation - Indirect Impacts from Operation:</u> The DEIS claims there are no indirect impacts from operation of the proposed project on recreation. The traffic alone impacts several recreational user groups. The Mission Ridge road is popular with road bikers, Forest Ridge residents who walk their dogs on the road, trail runners who connect the Devils Spur trailhead with the Lake Clara trailhead and then use the road to return to their car, uphill roller ski athletes use the road for summer training. All of these user groups will be displaced by 10,000 car trips per day which will make the Mission Ridge road unpleasant and unsafe for recreation. In addition, the noise from the traffic will impact recreationalists on the Lake Clara trail, the Devils Spur trail, and mountain bike riders on the trail system at Squilchuck State Park. The DEIS should be revised. Contrary to the conclusion of this chapter, operation of the project creates indirect impacts on recreation. The DEIS needs to identify and discuss the indirect impacts on recreation from operation of the Proposed Project. If these impacts are found to be significant and unavoidable, then the DEIS should move Section 5.10 - Recreation from Chapter 5 to Chapter 4

5.10.4 Recreation - Significant and Unavoidable Adverse Impacts: The DEIS claims there are no impacts on recreation from operation, and only minor impacts during construction which don't count because they are temporary and localized. Several direct and indirect adverse impacts from operation have been identified including crowding at the ski area, displacement or degraded experience of dispersed recreationalists including backcountry skiers, snowshoers, campers, bird watchers, hikers, trail runners, hunters, anglers, and horsemen. Impacts include the loss of Mission Ridge road availability for road bikers, dog walkers, and roller ski athletes. In addition, it is not accurate to downplay impacts from construction simply because they are temporary and localized. Temporary means 20 years for this project, and localized refers to the entire Squilchuck & Mission Ridge Road corridor, Squilchuck State Park, the Lake Clara basin, and the upper Stemilt basin. The Wenatchee valley enjoys unique access to the Wenatchee Mountains via a paved road all the way to the base of the mountains. Most communities do not have this amazing and easy access to alpine environments. This project affects access to the Wenatchee Mountains for every visitor using the Squilchuck and Mission Ridge roads. The DEIS should be revised to acknowledge the negative impacts from construction and operation. Many of these impacts are unavoidable. If they are also

found to be significant, then the DEIS should move <u>Section 5.10 - Recreation</u> from Chapter 5 to Chapter 4.

These are a few of my concerns related to the DEIS and the developer's erroneous claims and misinformation and illegal suggestions included in their "opinions" contained in their environmental impact statement.

Rather than address realistically how this project would impact wildlife, wilderness areas and current residents of Chelan County, it minimizes impacts, suggests "bending" rules and laws to maintain environmental safety and health and suggests changes to the county land that would be unethical.

If this were in the developer's back yard per se, would this proposal be ethical? I say no. The impacts are so severe from this suggested project that it would irreversibly damage this environment forever. As a steward of Chelan County, please hear my voice and do not approve this project.

KO Boling

From: <u>Audrey Dorshimer</u>

To: <u>missionridgeeis@outlook.com</u>

Subject: MR DEIS comment

Date: Saturday, October 18, 2025 9:20:42 AM

Dear Mr. Kaputa,

My name is Dr. Audrey Dorshimer, PT, DPT and I have lived in Wenatchee since 2019. I relocated to Wenatchee as a healthcare professional, serving the community that enjoys all that the valley has to offer. I have purchased a home here, I pay taxes here, and I am vested in this community. Thank you for the opportunity to provide comments regarding the DEIS for the proposed development adjacent to Mission Ridge ski area. The DEIS is full of omissions of impacts, inadequate mitigation of potential impacts, and incorrect assertions. Additionally, the proposed development violates Chelan County Codes. Because of this, I oppose the development and urge you to support the No Action Alternative. Below I highlight a small sample of the many issues in the DEIS:

Plants and Animals - Impacts from Construction - Commonly Occurring Terrestrial Animals - Suitable Habitat: The DEIS indicates that almost \(\frac{1}{3}\) of the project area whitebark pines will be cut, but claims that "construction impacts on the entire local" population of whitebark pine would be minor." Removing a significant portion of a threatened and endangered species is inconsistent with the mitigation offered by the applicant (Section 5.4.3.4 - Applicant-proposed mitigation measures) to "Protect all known special status species sites". This site is more important than the DEIS acknowledges because many of the higher-elevation whitebark pine trees are being severely attacked by pine beetles. Interestingly, some of the isolated and lower/mid elevation whitebark pine appear to be overlooked in these attacks. After the thicker groves of Whitebark pine are decimated on the upper mountain, these project area low and mid-elevation whitebark pines may become increasingly more important for the survival of all Mission Ridge whitebark pines. The DEIS should be revised to study and assess the impacts and extent of the beetle kill on the upper-elevation whitebark pine, and the unjustified claim that whitebark pine population impacts are minor should be removed from the document.

The DEIS summarizes the impacts on terrestrial animals without acknowledging any significance. "Overall, construction impacts on commonly occurring terrestrial animal species are expected to occur. However, as noted previously, many animals will leave the construction area to avoid the disturbance and occupy similar adjacent habitats, which are relatively abundant in the study area and surrounding lands." There is no evidence that similar, abundant habitats exist in adjacent lands. The DEIS wildlife maps show that high quality elk habitat is limited in the area. The 2025 FOMR Trail Camera Survey shows that cool, timbered, north-facing slopes are rare on Mission Ridge. Most of these north-facing habitats are interrupted with roads and the proposed project area contains one of the last intact patches of undisturbed habitat in this upper elevation environment. Nearby Section 17 was recently converted from an open forest where wildlife could move freely, to a fenced off orchard. Taken cumulatively, this shrinking of habitat reduces the size of animal populations, reduces genetic diversity, and causes impediments to migration and adaptation in the face of climate change and other pressures. Reducing habitat decreases

animal resiliency. The DEIS should be revised to acknowledge that habitat destruction has a significant impact and the assessment should include cumulative impacts including habitat destruction on nearby lands.

Table 5.4-2 Potential Construction Impacts on Special Status Terrestrial Species and Habitats contains inaccuracies or is missing information for Whitebark Pine, Cascade Red Fox:, Elk, Pika, Western Toad, Dusky and Sooty Grouse, Northern Goshawk, American Martin, Columbia Spotted Treefrog, Golden Eagles, Roosting Bat Colonies, Aspen, Oldgrowth Forest, Talus, and Migratory Birds. **The DEIS should be revised to:**

- Study and assess the impacts and extent of the beetle kill on the upperelevation whitebark pine
- Remove the unjustified claim that whitebark pine population impacts are minor.
- Confirm or rule out the presence of cascade fox in the project area.
- Include additional studies and the best available science in regards to impacts on elk near the project site.
- Include Pika.
- Confirm or rule out the presence of western toad such that appropriate mitigation can be discussed.
- Include additional grouse habitat discussion.
- Address the presence of goshawk on the project area.
- Consider American martin activity on the project area and provide serious mitigation discussion.
- Include breeding season studies of the project area wetlands to determine whether Colombian spotted treefrogs are using these habitats and determine appropriate compensatory mitigation for wetland destruction.
- Consider impacts to golden eagles by disturbance from the development.
- Conduct acoustic monitoring studies to determine talus use by roosting bats

and consider impacts of destruction of that unique and preferred talus bat roosting and hibernating habitat.

- Correct the reported size and priority habitat designation of the aspen stand and determine whether aspen removal is significant.
- Include an inventory of old-growth forest on the project area and an assessment of the impacts of loss of old-growth forest habitats on Section 19 and 25.
- Include a discussion of impacts to talus residents which may include roosting bat colonies, pika, larch mountain salamanders. A study will be required to identify resident species.
- Consider the impacts on migratory birds from light pollution, noise pollution and glass strikes from nearly 1000 new residential units plus commercial space and other buildings. The DEIS should offer mitigation strategies to compensate for these impacts.

These are just a few of the unclear, misleading, untrue, incomplete, arbitrary, and persuasive statements in the DEIS. I strongly encourage Chelan County to stick to established codes and not bend the rules for the benefit of a developer. Since the development breaks County Codes, I urge you to select the <u>No-Action Alternative</u>, which is the only alternative besides the full development build-out that is presented in the DEIS.

Thank you for considering my thoughts.

Dr. Audrey R. Dorshimer, PT, DPT 1025 Monroe St Wenatchee, WA 98801 dorshim2@gmail.com (517) 290-8121 From: Robert Scott

To: missionridgeeis@outlook.com
Subject: Mission Ridge Expansion

Date: Saturday, October 18, 2025 9:07:04 AM

Dear Mike,

I am writing to voice my opposition to the proposed expansion of Mission Ridge as configured in its latest EIS. That expansion should not be approved unless the Applicant provides a second access road to the residential portion of the expansion. Also, the expansion should not be approved unless the Applicant provides upgrades to the road from Wenatchee City limits to the Mission Ridge parking lot.

First, the lack of a second access road to the residential portion of the expansion puts those living there at a significant fire risk. The expansion has capacity to house 4,000 people. If a fire threatens the development, trying to get all those people out to safety on a single, two-lane road will be difficult. That evacuation will become impossible if smoke and flying embers cover the road. And 4,000 people living in that area increases the likelihood of a human-caused fire in the residential development. A fire in the development could block the access out thus cutting a means of escape for those residents.

Second, the existing Squilchuck Road is inadequate to handle the projected traffic flow. The EIS projects a daily traffic count of 10,000 vehicles. With this amount of traffic, people currently living on Squilchuck Road will have difficulty entering and leaving the road. In addition, not all of these 10,000 cars will be equipped for winter travel nor will all of these cars be driven by persons experienced in winter travel. With such a high number of travelers in winter conditions, traffic will slow to a crawl, resulting in stoppages, spin outs, cars in the ditch, and accidents. This problem will be particularly acute on the portion of the road from Squilchuck State Park to the Mission Ridge parking lot because of the multiple switchback turns on that stretch. Ten thousands vehicles daily is as many as goes over Stevens Pass. Stevens Pass has uphill lanes and a four-lane section. Except for a small section near Squilchuck State Park, Squilchuck Road has only two lanes. Before this development is approved, the Applicant must be required to provide uphill lanes on Squilchuck Road all the way to the Mission Ridge parking lot.

Finally, I object to this development because of its adverse effect on wildlife and its adverse effect on the environment in the Wenatchee Valley. The Applicant is requesting exceptions to some Chelan County Codes that protect public safety and our natural resources. No amount of economic benefit that might be derived from this development justifies granting these exceptions.

Thank you for considering these comments.

Robbie Scott

2608 South Methow Street

Wenatchee

From: Anthony Lubetski
To: Mike Kaputa

Subject: Mission ridge DEIS fails to realistically address inevitability of Fire and water scarcity.

Date: Saturday, October 18, 2025 8:56:55 AM

Dear Mike Kaputa, Chelan County NRD,

I am writing to urge you to select the No Action Alternative for the proposed Mission Ridge development. The DEIS fails to adequately address impacts to wildlife, habitat, and public safety, and does not meet Chelan County's standards for responsible growth.

I'm a valley resident that experienced level 3 evacuation this year during the lower sugarloaf fire. The county and fire fighting resources did everything correct and we still went from level 1 to 3 in a matter of 20 minutes. That was fine for our rural canyon but there was still traffic. If the same scenario played out after this development in the mission ridge environs, the consequences could be absolutely devastating to residents, resort workers, and firefighters alike. The DEIS fails to layout a viable framework for dealing with the inevitable fire cycle that ecosystem will see, development or not. Which brings me to the next major issue with the DEIS, water scarcity. There simply is not enough water to fight the inevitable wild fire with what is basically a small city also in the area.

The area surrounding Mission Ridge provides critical habitat for mule deer, elk, and wideranging carnivores such as black bears and cougars, as well as for species of greatest conservation need, including northern goshawks, golden eagles, whitebark pine, and American pika. These mountain and shrub-steppe transition zones are particularly sensitive to disturbance, serving as essential corridors for seasonal migration and climate adaptation. Fragmenting these connected habitats would cause long-term harm to wildlife movement, watershed health, and overall ecosystem resilience.

These foothills and forested slopes are part of a larger ecological network linking the Cascade crest to the Columbia Basin. Protecting their continuity supports not only iconic wildlife but also the long-term resilience of forests and watersheds, which face increasing drought, heat, and fire risks under a changing climate.

The proposal also depends on exceptions to Chelan County codes, enabling expanded human development in a fire-prone, high-elevation landscape. Increased human activity would elevate wildfire risk, strain emergency response capacity, and degrade sensitive habitats that wildlife depend on for survival. These risks are precisely why county planning standards exist: to safeguard public safety and ecological integrity alike.

Conservation and community are not opposing goals. Upholding existing land use protections honors both people and place by ensuring that wildlife, clean water, and natural character remain part of what makes this region special. Thoughtful planning today ensures that future generations can continue to hunt, hike, ski, and find connection in landscapes that remain wild and whole. Please select the No Action Alternative to protect the Mission Ridge landscape and the shared benefits it provides for wildlife and the community alike.

Thank you for your time and consideration.

Regards,

Anthony Lubetski 319 Wynnie Ln Cashmere, WA 98815 attended meetings and a film show by Friends of Mission Ridge that shows evidence to indicate these species use or migrate through the area, thus contradicting DEIS findings.

2. Wildfire Risk and Mitigation - SEP 2025 MISSION RIDGE DEIS_VOL I_EXEC SUMMARY AND MAIN TEXT.pdf Section 4.2.1.5 page 116 of 324.

The wildfire risk section lacks site-specific modeling and detailed mitigation commitments. Given the area's terrain and vegetation, this is a significant life-safety issue that requires more robust treatment. The surrounding communities of Leavenworth, Cashmere, and Wenatchee just experienced a devastating 2 to 3 months of wildfires, resulting in AQIs greater than 500 for continuous days. With climate change worsening year after year, it seems prudent that fire related sections be 110% accurate to ensure the safety of users, property, and infrastructure. Specifically, the DEIS should be revised to clarify that consultation with Chelan County Fire District is required and all costs for new service extension and capacity increase, including a new fire station and all apparatus required for that station, shall be borne by the development, and that these improvements must be in place and in operation before a single occupancy permit is issued.

Traffic, Parking, and Access Underestimation - SEP 2025 MISSION RIDGE DEIS_VOL I_EXEC SUMMARY AND MAIN TEXT.pdf Section 5.6.3.3 Direct Impacts from Operation page 252 of 324

The DEIS's traffic modeling underrepresents projected visitor numbers, resulting in understated impacts to Squilchuck Road and associated safety issues. Additionally, the document fails to present a feasible secondary access or emergency egress route, which is essential for wildfire evacuation.

The DEIS presents two road capacity analysis approaches that were analyzed in the 2025 Kimley Horn Traffic Impact Analysis Report. These include an alternative v/c (volume over capacity) approach, and the traditional Highway Capacity Manual approach. The Kimley Horn traffic analysis is faulty for both methods.

The results presented in the 2025 TIA are meaningless as they assume the ability to pass in the opposing lane, where this is not possible on the Mission Ridge Road. Appropriate analysis using Highway Capacity Manual, Sixth Edition (2016) — Chapter 15: Two-Lane Highways — the Percent Time Spent Following (PTSF) shows LOS D for weekday traffic in 2034 (post phase 3) which is unacceptable.

Mitigation is necessary but is not identified in the DEIS. For context, the TIA predicted new trips generated from the development are about twice the WSDOT traffic count for 2024 average daily trips on both Stevens Pass near Yodelin and

on Hwy 97 Blewit Pass, and roughly equal to the AADT on both State Route 28 between Rock Island and Quincy, and hwy97 (SR 2) just north of East Wenatchee.

The DEIS should be revised to include an updated TIA that utilizes appropriate calculation methods to determine LOS. When the updated report indicates for all 2034 cases that LOS falls below C, then appropriate mitigation should be required. The costs for this mitigation should be borne by the development.

Mission Ridge sends conflicting messages to the local community. The Mission Ridge website (https://expansion.missionridge.com/overview/) claims 57 room ski lodge, 621 condos, townhomes, and duplexes, 265 single family homes, dining, shopping, venues, in the new proposed development. What will all this bring? CROWDS, traffic, and lines. The development is being marketed as a ski expansion, however, this proposed new area is at a lower elevation, receives less snow, and will be entry level skiers. This will make the main area more congested.

On October 9, 2025, Mission Ridge marketing sent an email titled "Tamarack Festival Hits the Slopes on Saturday!" (titled not important but I want to include reference details) including the following

Protecting What Makes Mission Special

Near the end of September, we sold out of Premier Passes for the season. This coming winter, we'll continue to limit the availability of lift tickets on our most popular days. As the season approaches, we want to address some frequently asked questions about why we limit access to the mountain when there are more people who want to purchase passes and tickets.

For the past five years, we've taken these actions with one simple goal: protecting what makes our mountain special. By keeping lift lines shorter and the slopes less crowded, we can prioritize quality over quantity so you can enjoy every turn the way it's meant to be. That's the reason this mountain exists, and we're lucky enough to be able to prioritize guest experience thanks to our invested, independent owner. We're here to make sure The Ridge always feels like home every time you pull into the lot.

This Mission Ridge promise of less crowding and a special ski community contradicts the expansion project. If the Mission Ridge team isn't aligned on future goals, I cannot imagine how many other errors, omissions, and contradictions are in the current DEIS. I personally don't think the Mission Ridge team can adequately resolve the obstacles they may face in this project.

Please confirm receipt of this message.

Thank you,

Grant Chong

From: <u>Jennifer Goodridge</u>

To: missionridgeeis@outlook.com

Subject: Mission ridge EIS comments

Date: Friday, October 17, 2025 9:43:59 PM

Hello -

I am writing to provide comments on the proposal to expand Mission Ridge. If this development is approved as proposed, it appears that it will have significant impacts on the following environmental factors: **traffic, water resources, and safety**. In addition, this proposal is not consistent with the locally developed planning documents such as the Stemilt-Squilchuck Community Vision.

Traffic:

The proposed increase in vehicular trips will exceed the current capacity of the condition of Squilchuck road. The developer has not proposed any improvements to Squilchuck road so that the road would meet the level of service requirements for the number of vehicular trips proposed per day. Thus, there will be traffic impacts associated with the current proposal. Therefore, if this project is approved, then the County should require the developer to improve the entire length of Squilchuck road so that it meets the standards for the number of vehicular trips anticipated per day.

Water resources:

This development would utilize more water in a watershed that is already over-allocated. In addition, the proposal for wastewater treatment is not fully worked out for the full development. This development should not be approved in phases. All utilities needed for full build out should be required as part of the project approval and installed at the onset of the project at the cost of the developer. Approval of this development should require the developer to pay for providing water from the PUD and the design and construction of a wastewater treatment plant to accommodate full build-out.

Safety:

This development as proposed does not provide secondary access in the event of a fire. If approved, the developer should be required to provide a paved secondary egress route in the event of a fire. If this secondary egress is not provided and Squilchuck road is blocked by a fire, this puts the residents of this development at high risk with limited options to evacuate during a fire.

Finally, this proposed development does not preserve the rural character of the area which is one of the requirements for a Master Planned Resort Overlay. This amount of development in the upper watershed is in conflict with the principles outlined in the Stemilt-Squilchuck Community Vision.

Jennifer Hadersberger

From: Will McBrayer
To: Mike Kaputa

Subject: Please select No Action Alternative for Mission Ridge Proposed Development

Date: Friday, October 17, 2025 10:55:56 AM

Dear Mike Kaputa, Chelan County NRD,

I am writing to implore you to select the No Action Alternative for the proposed Mission Ridge development. As a natural resources professional and working biologist, I cannot stress enough how detrimental this proposed development would be to the natural resources of the Colockum, Stemilt, and Squilchuck basins. The DEIS fails to adequately address impacts to wildlife, habitat, and public safety, and does not meet Chelan County's standards for responsible growth. As a working biologist for an environmental consulting company, I find the results of their surveys extremely hard to believe.

The area surrounding Mission Ridge provides critical habitat for mule deer, elk, and wideranging carnivores such as black bears and cougars, as well as for species of greatest conservation need, including northern goshawks, golden eagles, whitebark pine, and American pika. These mountain and shrub-steppe transition zones are particularly sensitive to disturbance, serving as essential corridors for seasonal migration and climate adaptation. Fragmenting these connected habitats would cause long-term harm to wildlife movement, watershed health, and overall ecosystem resilience.

These foothills and forested slopes are part of a larger ecological network linking the Cascade crest to the Columbia Basin. Protecting their continuity supports not only iconic wildlife but also the long-term resilience of forests and watersheds, which face increasing drought, heat, and fire risks under a changing climate.

The proposal also depends on exceptions to Chelan County codes, enabling expanded human development in a fire-prone, high-elevation landscape. Increased human activity would elevate wildfire risk, strain emergency response capacity, and degrade sensitive habitats that wildlife depend on for survival. These risks are precisely why county planning standards exist: to safeguard public safety and ecological integrity alike. The fact there is only one road in and out is extremely alarming. When asked about this at a public hearing in February, the owner of Mission Ridge suggested folks could escape BY FOOT into the Stemilt Basin. This asinine response shows how little Mission Ridge actually cares about anything but making money. This "escape" plan is unacceptable and does not meet design criteria of Chelan County Code 15.30.230.4.

Conservation and community are not opposing goals. Upholding existing land use protections honors both people and place by ensuring that wildlife, clean water, and natural character remain part of what makes this region special. Thoughtful planning today ensures that future generations can continue to hunt, hike, ski, and find connection in landscapes that remain wild and whole. Please, please, please select the No Action Alternative to protect the Mission Ridge landscape and the shared benefits it provides for wildlife and the community alike.

Regards, Will McBrayer 506 Douglas St Wenatchee, WA 98801 From: Gordon Seslar

To: <u>missionridgeeis@outlook.com</u>

Subject: Mission Ridge Master Planned Resort Expansion Draft EIS Strong Concerns

Date: Friday, October 17, 2025 6:28:49 AM

October 17th, 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,

As I'm sure you have already read the below letter, I would like add to in that I have read it to. So thank you for the opportunity to provide comments regarding the DEIS for the proposed development adjacent to Mission Ridge ski area. The DEIS is full of omissions of impacts, inadequate mitigation of potential impacts, and incorrect assertions. Additionally, the proposed development violates Chelan County Codes. Because of this, I oppose the development and urge you to support the No Action Alternative. Below I highlight a small sample of the many issues in the DEIS:

Traffic on Squilchuck and Mission Ridge Road: The project predicts 10,000 vehicle trips per day on the Mission Ridge Road, which is roughly double the traffic on both Stevens Pass and Blewitt Pass. The DEIS predicts that the development will snarl traffic to a condition below minimum Chelan County standards, yet the DEIS does not include mitigation or improvements to the Mission Ridge Road. 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...". Our community should not be burdened by snarled traffic that financially benefits a developer but hurts the rest of us.

Secondary access to the development: A second access road is required to provide an alternate escape route if needed. However, the DEIS only presents secondary access as an alternative. Secondary access is not an alternative; it is a code requirement. The DEIS recognizes that the secondary access would make a safer situation, stating in section 4.2.1.6 that: "Having more than one evacuation route provides redundancy and increased safety, particularly during unexpected or fast-moving events." Yet, the developer argues that providing a single "wider" 28-foot access road will make up for the danger of not having an emergency exit. This offering of a single "wider" road is misleading. The current Mission Ridge Road is 28 feet wide and is not adequate for the proposed development's traffic. The proposed "wider" road is the same width as the existing road and won't even meet minimum County standards. Chelan County should not bend its rules on secondary access to benefit a developer at the jeopardy of the safety of residents and visitors of the development he wants to build.

WDFW Land Exchange: Section 25 is owned by the Washington State Department of Fish and Wildlife and encompasses Windy Ridge and Bowl 4, the upper half of Chair 4, and overlaps with the proposed project. Per the DEIS, WDFW said: "...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." Hunters use the section during archery and rifle seasons as well as for forest grouse hunting. Mule deer, Colockum Elk, golden eagles, goshawks, pika, marmots, bobcats, mountain lions, coyotes, and black bears regularly use the section's wildlife corridors. Section 25's whitebark pine forests, springs and wetlands, talus slopes, and undisturbed shrub-steppe

openings are vital wildlife habitats. This section grows more important as development threatens to destroy similar habitats on adjacent parcels. The DEIS discusses a land exchange between WDFW and Washington State DNR that would result in DNR owning Section 25 and implying that an expanded year-round resort would be allowable on DNR-owned Section 25. However, the DEIS further states that: "The land swap is not part of the current Proposed Project...". With the land exchange not on the table, the likelihood that it is illegal for DFW to swap the land, and DFW indicating that expanded year-round activity is not an allowable use of Section 25, Section 25 should be excluded from any expanded ski resort or development activity.

Master Planned Resort Overlay: Without the Master Planned Resort Overlay (MPR), the proposed level of development would violate the Urban Growth Act and could not be allowed. The developer is depending on this land use strategy which allows dense urban-style development outside the urban growth boundary. Despite depending on this planning tool, the development violates the requirements of MPRs including: Impacts are not fully mitigated, costs of public services are not fully borne by the developer, the development is not primarily a destination resort, is not self-contained, does not consist of short-term visitor accommodations, does not consider affordable employee housing, and does not preserve the rural character or natural resource it uses. Since the proposal does not meet the requirements for an MPR, the development should not benefit from the housing density allowed by an MPR.

These are just a few of the unclear, misleading, untrue, incomplete, arbitrary, and persuasive statements in the DEIS. I strongly encourage Chelan County to stick to established codes and not bend the rules for the benefit of a developer. Since the development breaks County Codes, I urge you to select the No-Action Alternative, which is the only alternative besides the full development build-out that is presented in the DEIS.

Thank you for considering my comments.

Gordon Seslar 1509 Woodhaven Place Wenatchee WA, 98801 From: Chris Phillippi

To: missionridgeeis@outlook.com
Subject: Mission Ridge Expansion

Date: Tuesday, October 14, 2025 6:31:44 PM

I am writing in support of the Mission Ridge expansion plan. The plan seems consistent with other ski resort developments I have visited. I ski at Mission a lot, and while the slopes are relatively uncrowded even on busy weekends, the lodge and the parking lot fill up quickly. Having more parking and lodge space would be great, and are truly needed to preserve the classic Mission Ridge experience. Adding nordic, snowshoeing, tubing, and more beginner area would really open Mission Ridge up to a larger demographic of people than just skiers, so it seems like this expansion would be inclusive. It should also be a great amenity for the residents of the Wenatchee Valley, as well as a positive for our local economy.

The plan looks like it will create a ski resort similar to those I have visited in B.C., Idaho, Wyoming, New Mexico, Montana, California, and Utah so this seems to be a proven type of development. This isn't some brand new thing, it's just that it's brand new here. If we can look outside our small area we can see that many other companies are successfully, responsibly, and safely developing remote areas for public recreation. Being familiar with the ownership group, I cannot see why they would not be able to do an expansion as good or better than any of the many other ski resorts across the Western US and Canada. The small amount of additional public land required for the development will be surpassed by the benefits to the public.

I have been skiing at Mission Ridge for 48 years, averaging over 30 days ski days at Mission Ridge each season for the last 30 years, and in the last ten years the parking lot and the lodge have become really crowded. In contrast to what many of the opponents say, I feel like Mission Ridge needs to expand to preserve the Mission Ridge experience, and there really isn't a lot of other room in the existing base area.

On the other hand, once you get on the mountain there is room to spread out. It really seems like there is plenty of space up there for more skiers, and if they were able to have more parking and more lodges it would make a more enjoyable experience. Plus, the terrain they are hoping to add is mostly beginner, which is really lacking at the current ski area, forcing beginner and more advanced skiers to interact on the same slopes. Overall, the expansion would make it more like the experience I remember as a kid, when you didn't have to plan your arrival or lunch time, you just went when you were ready and ate when you were hungry.

Generally speaking, the population of our state has expanded much more rapidly than recreational facilities like Mission Ridge. We are seeing recreation pressure all across our county in all seasons, and it is not going to stop. We live in a world class area in terms of recreation and climate, and people are drawn here. Expanding access in an inclusive manner like the Mission Ridge expansion is just what the county and the state and the feds should be supporting. The economic and quality of life benefits are real, and the environmental impact should be no greater than any other ski resort.

From: <u>Mike Byers</u>

To: <u>missionridgeeis@outlook.com; sbretiremb@gmail.com</u>

Subject:Mission Ridge DEIS commentsDate:Monday, October 13, 2025 4:56:29 PMAttachments:MR DEIS comments BYERS 10-13-25.pdf

Hello Chelan County -

We wanted to provide a few comments on the MR DEIS. We are overall in favor of the project as we feel it would be good for Wenatchee. We want to make sure it is done correctly and we feel that the County is working toward that end.

We have attached our comments.

Sue and Mike Byers 2960 Mission Ridge Rd Wenatchee, WA sbretiremb@gmail.com From: grant chong

To: <u>missionridgeeis@outlook.com</u>

Subject: Comments to Mission Ridge Expansion Project DEIS

Date: Sunday, October 12, 2025 4:57:13 PM

I appreciate the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Mission Ridge Master Planned Resort Expansion.

I am a 32 year old Quality Engineer who works in Wenatchee and lives in Cashmere. I moved here from the Seattle area in May 2024. I love this area; it truly is a hidden gem in Western US. I grew up in Michigan where communities were strong and people truly knew and respected their neighbors. I see that in our community. In contrast, I have visited and skied at the large corporate owned ski resorts across the US such as Jackson Hole, Big Sky, Park City, and Mammoth Lakes. There are countless stories that locals are forced out of their homes because of the increase in cost of living related to a tourism economy and a loss of shared community identity. They simply turned into Vail Resorts Inc. or Alterra Mountain Company with leakage of local economic impact at high levels.

I strongly oppose the Mission Ridge Expansion Project. Many of the features being marketed as glamorous just seem to be avenues for wealthy non residents that negatively impact the Wenatchee local community.

After reviewing the document and supporting supplements, I have identified factors where the DEIS contains discrepancies and insufficient analysis that may lead to an incomplete and inaccurate understanding of environmental and community impacts. This project has large and irreversible ramifications to critical resources, quality of life, and positive economic impact to the surrounding community. It is paramount the DEIS is accurate for all stakeholders and decision makers. My read of the document and involvement in recent public meetings point to inaccuracies that hide negative impacts.

Here is my supporting evidence:

Key Discrepancies and Concerns

 Wildlife Presence and Habitat Mischaracterization - SEP 2025 MISSION RIDGE DEIS_VOL IV_APP G-L.pdf, 7. Wildlife Species and Habitat starting on page 92 of 2017.

The DEIS understates or omits use of the project area by key species such as American pika, golden eagles, northern goshawk, elk, and mule deer. I have attended meetings and a film show by Friends of Mission Ridge that shows evidence to indicate these species use or migrate through the area, thus contradicting DEIS findings.

Wildfire Risk and Mitigation - SEP 2025 MISSION RIDGE DEIS_VOL I_EXEC SUMMARY AND MAIN TEXT.pdf Section 4.2.1.5 page 116 of 324.

2.

The wildfire risk section lacks site-specific modeling and detailed mitigation commitments. Given the area's terrain and vegetation, this is a significant life-safety issue that requires more robust treatment. The surrounding communities of Leavenworth, Cashmere, and Wenatchee just experienced a devastating 2 to 3 months of wildfires, resulting in AQIs greater than 500 for continuous days. With climate change worsening year after year, it seems prudent that fire related sections be 110% accurate to ensure the safety of users, property, and infrastructure. Specifically, the DEIS should be revised to clarify that consultation with Chelan County Fire District is required and all costs for new service extension and capacity increase, including a new fire station and all apparatus required for that station, shall be borne by the development, and that these improvements must be in place and in operation before a single occupancy permit is issued.

Traffic, Parking, and Access Underestimation - SEP 2025 MISSION RIDGE DEIS_VOL I_EXEC SUMMARY AND MAIN TEXT.pdf Section 5.6.3.3 Direct Impacts from Operation page 252 of 324

The DEIS's traffic modeling underrepresents projected visitor numbers, resulting in understated impacts to Squilchuck Road and associated safety issues. Additionally, the document fails to present a feasible secondary access or emergency egress route, which is essential for wildfire evacuation.

The DEIS presents two road capacity analysis approaches that were analyzed in the 2025 Kimley Horn Traffic Impact Analysis Report. These include an alternative v/c (volume over capacity) approach, and the traditional Highway Capacity Manual approach. The Kimley Horn traffic analysis is faulty for both methods.

The results presented in the 2025 TIA are meaningless as they assume the ability to pass in the opposing lane, where this is not possible on the Mission Ridge Road. Appropriate analysis using Highway Capacity Manual, Sixth Edition (2016) — Chapter 15: Two-Lane Highways — the Percent Time Spent Following (PTSF) shows LOS D for weekday traffic in 2034 (post phase 3) which is unacceptable.

Mitigation is necessary but is not identified in the DEIS. For context, the TIA predicted new trips generated from the development are about twice the WSDOT traffic count for 2024 average daily trips on both Stevens Pass near Yodelin and on Hwy 97 Blewit Pass, and roughly equal to the AADT on both State Route 28 between Rock Island and Quincy, and hwy97 (SR 2) just north of East Wenatchee.

The DEIS should be revised to include an updated TIA that utilizes appropriate

calculation methods to determine LOS. When the updated report indicates for all 2034 cases that LOS falls below C, then appropriate mitigation should be required. The costs for this mitigation should be borne by the development.

4. Mission Ridge sends conflicting messages to the local community. The Mission Ridge website (https://expansion.missionridge.com/overview/) claims 57 room ski lodge, 621 condos, townhomes, and duplexes, 265 single family homes, dining, shopping, venues, in the new proposed development. What will all this bring? CROWDS, traffic, and lines. The development is being marketed as a ski expansion, however, this proposed new area is at a lower elevation, receives less snow, and will be entry level skiers. This will make the main area more congested.

On October 9, 2025, Mission Ridge marketing sent an email titled "Tamarack Festival Hits the Slopes on Saturday!" (titled not important but I want to include reference details) including the following

Protecting What Makes Mission Special

Near the end of September, we sold out of Premier Passes for the season. This coming winter, we'll continue to limit the availability of lift tickets on our most popular days. As the season approaches, we want to address some frequently asked questions about why we limit access to the mountain when there are more people who want to purchase passes and tickets.

For the past five years, we've taken these actions with one simple goal: protecting what makes our mountain special. By keeping lift lines shorter and the slopes less crowded, we can prioritize quality over quantity so you can enjoy every turn the way it's meant to be. That's the reason this mountain exists, and we're lucky enough to be able to prioritize guest experience thanks to our invested, independent owner. We're here to make sure The Ridge always feels like home every time you pull into the lot.

This Mission Ridge promise of less crowding and a special ski community contradicts the expansion project. If the Mission Ridge team isn't aligned on future goals, I cannot imagine how many other errors, omissions, and contradictions are in the current DEIS. I personally don't think the Mission Ridge team can adequately resolve the obstacles they may face in this project.

Please	confirm	receipt	of this	message.
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Thank you,

Grant Chong

From: <u>John Hare</u>

To: missionridgeeis@outlook.com
Subject: Response to Mission Ridge DEIS
Date: Saturday, October 11, 2025 9:41:38 AM

The following are my concerns regarding the DEIS for the Mission Ridge LLC proposal.

Thank you
John Hare
3090 Tamarack Place
Wenatchee, Washington 98801
Harehouse325@gmail.com
509-888-3493

Purpose of proposed project and impact on the current skiing public issues

DEIS 2.1 Project Objectives

The DEIS should more accurately describe this as a new planned community, not an expanded resort.

Under Purpose and Need the DEIS lists the following as current limitations that impede resort operations.

- Insufficient onsite parking facilities to meet peak demand
- Undersized and crowded beginner skier terrain
- Lack of recreation options for non-skiers
- Lack of onsite overnight accommodations

These issues could be addressed with significantly less impact on the surrounding area.

Insufficient parking facilities can be addressed either by expanding the USFS permit area adjacent to the current parking area, improved shuttle service from the Wenatchee Park and Ride, or construction of a parking garage.

Parking will continue to be an issue with the proposed development because the new proposed parking area will be offset by the loss of existing parking for the new access road. The new parking will require skiers to drive further and utilize a lift to gain access to the main ski runs.

Beginner skier terrain could be improved by expanding the beginner runs in the existing area, improving the associated lifts, and/or through expansion of the USFS permit area adjacent to the current operation.

Back country activities will be lost to the new housing development.

Lack of overnight accommodations can be addressed by an improved shuttle service from the existing Wenatchee hotels to the ski area.

Project Alternatives:

DEIS 2.6.1 Alternates Considered

The DEIS has only two alternatives: The proposed development or no development at all.

Another alternative the DEIS should have explored is improvement of the facilities in the existing area and/or additions on an expanded USFS permit area adjacent to the current property.

Wildfire Issues:

DEIS 4,2,1 Wildfire Risk

DEIS 4.2.1.2 Fire Risk Shelter In Place

The applicant appears to propose and the DEIS seems to support shelter in place as the primary wildfire mitigation. This is only valid for small and short lived fires with limited smoke. As seen by our recent Labor Mountain and Lower Sugar Loaf fires, wildfires can be long term with excessive smoke and hazardous conditions. The DEIS suggests that fire is most likely from the West or South, and so a single escape route along Mision Road is acceptable in conjunction with Shelter In Place. The Labor Mountain fire has closed a major US highway for more than two weeks and is north of the ski area. Wildfire can occur in any direction and could close the Mission-Squilchuck roads for weeks. The DEIS should reflect this as a possibility. This type of condition in the Mission-Squilchuck area should require a secondary route and invalidate shelter in place as an alternative to evacuation.

The increased population increases the potential for serious injuries requiring extraction to medical facilities. A route alterative to Squilchuck road must be considered. Squilchuck road could become blocked due to landslide (established hazard), fire, or accident.

The Mission Road has seen significant earth movement and has required repair recently. Without significant slope and road improvements, this road could become impassable. The road being the only emergency access for a community of thousands of people should have been identified in the DEIS as a significant concern.

Three of the four proposed alternate (secondary) evacuation routes are facilitated by returning to the Mission and Squilchuck Roads at approximately the exit to the Squilchuck Park. This will not provide a sufficient route for any fires downhill of the park

in the treed and brush areas along Squilchuck Road. There is a designated hazardous slide area along Squilchuck road that could prevent emergency egress. These hazards should be emphasized by the DEIS. An alternate route, either toward Wenatchee Heights or toward Ellensburg should be identified by the DEIS as the preferred secondary route.

The proposed alternate routes through the Forest Ridge development would have a significant impact on the residents of Forest Ridge.

The proposed fire station and staffing is an important mitigating factor for structural fires and local issues. It is less a factor for widespread wildfires. The fire station is to be staffed by volunteers. The closure of either Mission or Squilchuck roads could prevent offsite volunteer staff from getting to the station.

It would be important to establish this fire station during the early stages of phase one to address the increased fire risk associated with deforestation, slash burn, and earth work; all of which increase the likelihood of fire.

Law Enforcement Issues.

DEIS 5.7.1 Uitlities / Public Services

The transition to a year round residential community (more populous than either Leavenworth or Cle Elum) from a day use only area will result in a need for significantly increased law enforcement presence. The DEIS indicates the Chelan County Sheriff's Office has identified the need for a minimum of 8 additional officers. The DEIS should stipulate that due to the community remoteness, limited access, and potential access blockage, a law enforcement office should be maintained onsite. The DEIS indicates funding for the increase in law enforcement has not been determined and discussion is ongoing. The DEIS should stipulate the costs of a law enforcement office and staffing should be determined prior to the start of phase one.

<u>Traffic and Transportation Issues</u>:

DEIS 5.6.3.3 Direct Impacts from Operation

The DEIS neglects to study intersections at Squilchuck and Kray Ike Court, Squilchuck and Saddlehorn Avenue, Squilchuck and Saddlehorn Lane, Squilchuck and Cranmer Road, Squilchuck and Halverson Canyon, Squilchuck and Lehman Road, Squilchuck and Hampton Canyon, Squilchuck and Squilchuck State Park, Mission Ridge Road and Forest Ridge Road, Mission Ridge Road and Beehive Reservoir Road, and the intersection between the parking lot at Mission Ridge and the proposed new County road extension

The intersection between Forest Ridge Drive and Mission Road is utilized by approximately 100 families living in the Forest Ridge development. This intersection

currently has limited sightlines and can be challenging during the winter as traffic returning from the ski area to Wenatchee typically move at a rate well above the posted limits. The restricted sightlines currently make this a hazardous intersection. Forest Ridge Drive is relatively steep at the exit to Mission Road and currently, during winter, it is not unusual even with extreme care to slide through the intersection. The hazard will increase without significant improvements at this intersection. With the traffic forecast, the ingress and egress into Forest Ridge subdivision will be significantly impacted. The potential for collisions will be increased for cars stopped on the uphill side waiting to enter Forest Ridge because of downhill traffic. A separate turn lane or traffic light should be considered.

During Phase One construction traffic will impact the Mission Road intersection with Forest Ridge Road. Intersection improvements should be made prior to start of Phase One to reduce the impact of the construction traffic on the Forest Ridge neighborhood.

Noise Consideration

DEIS 5.8.33 Noise Direct Impact from Operationss.

The DEIS states the nearest existing sensitive receptors to the Project Area are residences that are more than 3 miles away.

The Forest Ridge neighborhood is less than a $\frac{1}{2}$ mile distance from the project. The statement in the DEIS is obviously incorrect.

Noise and air pollution during all phases of the project are a major concern to the residential area in and around Forest Ridge. Smoke from slash burning could significantly impact the residents in this area, dependent on winds. This has not been addressed adequately in the proposed plan.

Construction noise is also a significant concern to the residents in the Forest Ridge area as the length of the project is significant. Meeting the minimal noise standards provided by the county is sufficient for short term noise pollution, but will not address the extended period the project will be under construction. Higher noise standards and extended periods of non-activity should be required during construction; especially during Phase One, when earth and deforestation work with high noise impact will be underway.

Utility Impacts:

Significant utility impacts are envisioned for the corridor along Squilchuck and Mission roads. They will impact residential areas along the roads and within the Forest Ridge subdivision. Those future impacts should be detailed and approvals established before construction of Phase one starts.

If the upgrades are not accomplished, there may be insufficient power and water as the proposed area grows. The electrical supply system is currently at 95% capacity. Significant improvements are required prior to phase one to ensure that the current customers along the corridor do not suffer service issues due to the projects implementation.

Incomplete Project Impacts:

DEIS 2.3.3 Proposed Project Operation and Phasing:

The developer has the ability to stop construction at any time with no obligation to complete future phases. The project narrative suggests using up existing utility resources until construction of the next phase would require upgrade of the PUD water delivery system, construction of a wastewater treatment plan, intersection and road improvements, and upgrade of the PUD power delivery system.

This could result with Chelan County and the PUD (and therefore the residents of Chelan County) being responsible for the additional infrastructure costs to support the new community as it continues to grow beyond the point the developer stopped construction.

To minimize the financial risk to the county, the DEIS should stipulate the developer be required, prior to starting the project, to provide a bond or insurance policy that will cover the total projected infrastructure costs through the completion of the project. This should include: Improvements to Mission and Squilchuck roads and associated intersections, construction of a secondary access road, construction of a new fire station, construction of a law enforcement station, and all necessary utility improvements required to service the com

From: Spencer Johnson

To: <u>missionridgeeis@outlook.com</u>

Subject: Mission Ridge Expansion Public Comments - Concerns with MPR Overlay

Date: Friday, October 10, 2025 10:47:24 AM

To whom it may concern,

I am writing to express my concern regarding the proposed Mission Ridge Expansion. I am concerned that this proposal does not meet the intent of a Master Plan Resort designation and instead prioritizes residential development over resort focused amenities. Please see my below concerns:

Housing Density

Chelan County Code 11.89 limits MPR developments to a maximum of two housing units per gross acre across the entire overlay area. However, the Mission Ridge proposal includes:

- 621 condominiums
- 275 single-family homes
- 80 employee housing units
- A 57-room lodge

This totals nearly 1,000 residential and lodging units, yet no clear calculation has been provided to show that this stays under the two-units-per-acre limit. Without a full accounting of total acreage and unit breakdown, it's impossible for the public or County to verify compliance.

Request: Please do not approve the MPR overlay until a full housing density calculation is made public and shown to meet code.

Misuse of Public Lands in Open Space Calculation

The MPR overlay code 11.89.050 clearly states that at least 40% of the total acreage within the overlay must be permanently protected as open space, and that the applicant must have ownership or full control of this land to ensure it remains

protected (11.89.040).

While the proposal claims to set aside a significant portion of land as open space, it is unclear how much of that land is privately owned by the applicant versus public lands (such as Forest Service or DNR lands).

Public lands should not be counted toward the required 40% open space because they are not owned or controlled by the applicant per 11.89.040(4). Furthermore, Chelan County code 11.89.040(3) clearly states that an MPR shall not be in lands dedicated for agriculture or forest service land which further invalidates this public land from being included in the MPR or used to meet the open space requirement.

Neither the U.S. Forest Service nor the Washington DNR are listed as applicants or co-applicants in this proposal. The applicant does not have permanent development rights or land-use authority over these public lands. Including these public lands in the open space calculation misrepresents compliance with MPR requirements and sets a concerning precedent.

Request: 1) A clear and transparent breakdown of what land is being counted as open space—specifically distinguishing between privately owned land and public land not under the applicant's control, and 2) confirmation that all land counted toward open space is under the applicant's direct and permanent control, as required by code

Parking

The proposal fails to demonstrate that it meets the required parking standards. It mentions 590 new parking spaces for day use, but it does not account for:

- Overnight guest parking
- Employee and service vehicle parking
- Visitors to commercial areas
- Overflow during peak winter days

There is no clear parking plan showing how all these needs will be met. Without that, the project risks overcrowding, road safety hazards, and overflow into surrounding public lands, roads and public day use parking—all of which violate MPR overlay

goals and Chelan County Code. This poses a risk of overflow parking impacting day use parking.

Request: Please do not approve the MPR overlay until a complete, detailed parking plan is submitted that includes all use types and peak demand.

Misalignment of Intent of MPR Overlay

The MPR overlay was created to facilitate the development of destination resorts, which are meant to be primarily focused on tourism and recreational amenities that attract visitors from outside the region. However, the current proposal for Mission Ridge includes an overwhelmingly high number of residential housing units, with relatively little in the way of new or expanded resort-specific amenities that would serve non-resident visitors. This imbalance undermines the core purpose of the MPR.

The defining characteristic of a Master Planned Resort is the presence of significant, integrated recreational and visitor-serving facilities, such as lodges, restaurants, spas, ski terrain, and other resort infrastructure. In this case, the proposal seems to use the MPR overlay as a vehicle to authorize large-scale residential development that more closely resembles a housing subdivision than a destination resort. The proposed housing density—particularly the number of units with no guarantee they will be used for tourism—raises serious questions about the long-term function and character of this project.

This raises a broader concern about precedent. If this proposal is allowed to proceed under the MPR designation despite failing to prioritize resort infrastructure, it could open the door for future developments to exploit the MPR code as a means of fast-tracking housing subdivisions in rural areas—bypassing the more stringent land use controls and environmental scrutiny that apply outside of MPR zones.

Request: I urge the County to carefully evaluate whether this proposal truly fulfills the intent of the MPR overlay. A genuine destination resort should be anchored in tourism and recreation—not in residential real estate. As currently proposed, the Mission Ridge expansion does not meet that standard.

Thank you for your time and for considering these comments in the review of this development.

Sincerely,

Spencer Johnson

856 Willowbrook Drive

Wenatchee, WA

From: <u>Dean O"Daffer</u>

To: missionridgeeis@outlook.com
Subject: Mission Ridge Expansion DEIS

Date: Wednesday, October 8, 2025 10:00:51 AM

Mission Ridge Expansion DEIS

There are numerous reasons that I oppose the Mission Ridge (MR) Expansion project. High on this list is the effect that the MR expansion project will have on the integrity of the surrounding lands. The most important in my mind are the Clara Lake/Pipeline/Devils spur trails and the Stemilt Basin wildlife area. Both of these areas would be easy access for the people staying in the 886 units of the expansion residential housing.

The Clara Lake/Pipeline/Devils spur trails are close enough to Wenatchee/East Wenatchee that local residents can drive 15-20 miles and enjoy a forest experience. It is an easy getaway to an uncrowded area. I believe that the MR expansion will cause these trails to be overused, such as what has happened to Colchuck Lake, where you can't see the forest through all the people.

I am concerned about the future of the Stemilt Wildlife area because it is host to deer and elk herds, it provides a safe place for calfing. A few years ago I took my dog on a hike through the section just south of Wheeler reservoir, which is just down the hill from the MR expansion site. My dog flushed out a baby fawn and attempted to run it down, fortunately the fawn was able to escape. This experience led me to vow to never bring my dog during spring calving season. What will happen when there are people staying in housing want to walk their dogs. Dogs and deer are incompatible, this would be very detrimental to the to the entire herd.

How does the DEIS plan to mitigate these two above cases?

Another reason for opposition is the fire situation, the forests in NCW are ranked as one of the riskiest in the nation. Most insurance companies are opting out for insuring homes and buildings. The MR expansion rightly so, wants to have a fire station nearby. This should be a joint effort between Mission Ridge and Chelan County. What are details of this commitment? These should be spelled out in advance of a permit. It was noted that in case of a forest fire, evacuation would be a

priority. There is substantial risk for evacuation on the Mission Ridge road if a fire comes in from the west. Currently there are no plans to thin the forests above the Mission Ridge Road near the Ski area. Would not this possibility necessitate an alternate access/egress route through Stemilt basin?

Did the study of the effects of night lighting also include the lights from the 886 housing units and other buildings. You would think that this would cause a night glow, even if one cannot see the lights directly, these lights would glow the entire year. As Vincent Va Gogh said "For my part, I know nothing with any certainty but the sight of the stars makes me dream." Rather difficult with the bright lights and light glow in our night sky. What is being done to prevent this problem?

Environmentally this project is a waste of our valuable resources, It puts 886 housing units 15 miles away from most services. Waste such as extra power and water lines, fuel consumption and peoples time for transportation. Why shouldn't the developers be required to offset this power consumption and increased infrastructure by being required to build with rooftop solar panels and heat pumps for heating and cooling?

Another question of this unsustainable project is: What effect will the building construction have on the availability of skilled building workers, such as carpenters, plumbers, electricians, excavators, drywallers, heating and cooling workers and painters, to the residents living in Chelan County? Usually less availability translates into higher costs. Has this situation been addressed in the DEIs?

Dean O'Daffer Wenatchee mdodaffer@yahoo.com From: Michele McKay

To: missionridgeeis@outlook.com

Subject: Mission Ridge expansion Draft EIS

Date: Tuesday, October 7, 2025 12:55:23 PM

Regarding Chelan County's Draft EIS for the Mission Ridge expansion master planned resort:

The idea of a resort at Mission Ridge that generates up to 10,000 cars per day (2x Stevens Pass + Blewett Pass), accommodates 4000 people at one time (~ 2x Leavenworth population), and includes up to 7812 beds plus parking for 5500 people is ludicrous for reasons of safety and impact.

I find the DEIS to be unclear and incomplete, as well as potentially misleading.

My concerns regarding the DEIS include:

Traffic:

The project creates a level of service condition below the minimum accepted Chelan County standard, yet no mitigation is proposed.

Secondary access is required by code, yet the developer presents inappropriate loopholes to avoid this safety requirement.

WDFW land exchange:

WDFW has stated that "...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."

Master Planned Resort Overlay:

Without the MPR, this level of development would violate the Urban Growth Act and could not be allowed. However, the development violates the requirements of MPRs because it is not primarily a destination resort, is not self-contained, does not consist of short-term visitor accommodations, does not consider affordable employee housing, and does not preserve the rural character or natural resource it uses.

Wildfire risk:

The DEIS should be updated to acknowledge the possibility of very large uncontrollable wildfires and to assess risk associated with the current, not historical, condition of the surrounding forest.

The DEIS should be revised to substantiate the unrealistic claims that a wildfire originating to the north of the development poses "...a moderate risk to the development and a low risk to evacuation." and that there would be "low risk to evacuation" caused by a fire approaching from the south. (Note the current Labor Mountain fire)

Wildfire safety zones:

Suggesting that areas 'may' satisfy safety zone requirements is misleading and worthless in decision making. To understand the risk to a resident stranded at the development during a wildfire, the actual safety zone risk must be determined.

The DEIS should be revised to provide specific analysis of the Mission Ridge Parking Lot and any other area intended to be used as a safe zone, to determine conclusively whether those areas are, or are not, adequate safe zones if evacuation is not needed.

Wildfire egress:

The DEIS acknowledges that the proposed single access road could be blocked, but downplays the danger of a blocked exit during a wildfire as an inconvenience.

The DEIS further states that on-site emergency services reduce the risk associated with a single pathway. It is misleading to suggest that on-site emergency services can reduce the risk of death from an approaching wildfire that can't be escaped because the single access road is blocked.

The DEIS should be revised to acknowledge that blockage of the single access road could result in fatalities.

Impacts from operation:

Impacts from operation are vast and need much more analysis and consideration. These impacts include:

Visual

Plants and animals (vegetation and wildlife)

Ground and surface water resources

Water quality

Air quality

Fire risk

Energy demand

Recreation access

Mitigation factors

In short, this development project is not only a nightmare, but a disaster waiting to happen.

Thank you for the opportunity to comment.

Michele McKay

michemckay@gmail.com

From: Steph

To: <u>missionridgeeis@outlook.com</u>

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

Date: Sunday, October 5, 2025 7:37:43 PM

Dear Mr. Kaputa,

I am a concerned community member in Wenatchee that does not like the idea of the master planned resort expansion.

Thank you for the opportunity to provide comments regarding the DEIS for the proposed development adjacent to Mission Ridge ski area. The DEIS is full of omissions of impacts, inadequate mitigation of potential impacts, and incorrect assertions. Additionally, the proposed development violates Chelan County Codes. Because of this, I oppose the development and urge you to support the <u>No Action Alternative</u>. Below I highlight a small sample of the many issues in the DEIS:

Traffic on Squilchuck and Mission Ridge Road: The project predicts 10,000 vehicle trips per day on the Mission Ridge Road, which is roughly double the traffic on both Stevens Pass and Blewitt Pass. The DEIS predicts that the development will snarl traffic to a condition below minimum Chelan County standards, yet the DEIS does not include mitigation or improvements to the Mission Ridge Road. 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...". Our community should not be burdened by snarled traffic that financially benefits a developer but hurts the rest of us.

Secondary access to the development: A second access road is required to provide an alternate escape route if needed. However, the DEIS only presents secondary access as an alternative. Secondary access is not an alternative; it is a code requirement. The DEIS recognizes that the secondary access would make a safer situation, stating in section 4.2.1.6 that: "Having more than one evacuation route provides redundancy and increased safety, particularly during unexpected or fast-moving events." Yet, the developer argues that providing a single "wider" 28-foot access road will make up for the danger of not having an emergency exit. This offering of a single "wider" road is misleading. The current Mission Ridge Road is 28 feet wide and is not adequate for the proposed development's traffic. The proposed "wider" road is the same width as the existing road and won't even meet minimum County standards. Chelan County should not bend its rules on secondary access to benefit a developer at the jeopardy of the safety of residents and visitors of the development he wants to build.

WDFW Land Exchange: Section 25 is owned by the Washington State Department of Fish and Wildlife and encompasses Windy Ridge and Bowl 4, the upper half of Chair 4, and overlaps with the proposed project. Per the DEIS, WDFW said: "...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." Hunters use the section during archery and rifle seasons as well as for forest grouse hunting. Mule deer, Colockum Elk, golden eagles, goshawks, pika, marmots, bobcats, mountain lions, coyotes, and black bears regularly use the section's wildlife corridors. Section 25's whitebark pine forests,

springs and wetlands, talus slopes, and undisturbed shrub-steppe openings are vital wildlife habitats. This section grows more important as development threatens to destroy similar habitats on adjacent parcels. The DEIS discusses a land exchange between WDFW and Washington State DNR that would result in DNR owning Section 25 and implying that an expanded year-round resort would be allowable on DNR-owned Section 25. However, the DEIS further states that: "The land swap is not part of the current Proposed Project...". With the land exchange not on the table, the likelihood that it is illegal for DFW to swap the land, and DFW indicating that expanded year-round activity is not an allowable use of Section 25, Section 25 should be excluded from any expanded ski resort or development activity.

Master Planned Resort Overlay: Without the Master Planned Resort Overlay (MPR), the proposed level of development would violate the Urban Growth Act and could not be allowed. The developer is depending on this land use strategy which allows dense urban-style development outside the urban growth boundary. Despite depending on this planning tool, the development violates the requirements of MPRs including: Impacts are not fully mitigated, costs of public services are not fully borne by the developer, the development is not primarily a destination resort, is not self-contained, does not consist of short-term visitor accommodations, does not consider affordable employee housing, and does not preserve the rural character or natural resource it uses. Since the proposal does not meet the requirements for an MPR, the development should not benefit from the housing density allowed by an MPR.

These are just a few of the unclear, misleading, untrue, incomplete, arbitrary, and persuasive statements in the DEIS. I strongly encourage Chelan County to stick to established codes and not bend the rules for the benefit of a developer. Since the development breaks County Codes, I urge you to select the <u>No-Action Alternative</u>, which is the only alternative besides the full development build-out that is presented in the DEIS.

Thank you for considering my comments.

Stephanie Butcher 942 Highland Dr Wenatchee WA 98801 360-746-2264 From: <u>Dan Kravig</u>

To: <u>missionridgeeis@outlook.com</u>

Subject: Mission Ridge expansion

Date: Sunday, October 5, 2025 9:18:56 AM

October 5, 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 full of omissions of impacts, inadequate mitigation of potential impacts, and incorrect assertions. Additionally, the proposed development violates Chelan County Codes. Because of this, I oppose the development and urge you to support the <u>No Action Alternative</u>. Below I highlight a small sample of the many issues in the DEIS:

Traffic on Squilchuck and Mission Ridge Road: The project predicts 10,000 vehicle trips per day on the Mission Ridge Road, which is roughly double the traffic on both Stevens Pass and Blewitt Pass. The DEIS predicts that the development will snarl traffic to a condition below minimum Chelan County standards, yet the DEIS does not include mitigation or improvements to the Mission Ridge Road. 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...". Our community should not be burdened by snarled traffic that financially benefits a developer but hurts the rest of us.

Secondary access to the development: A second access road is required to provide an alternate escape route if needed. However, the DEIS only presents secondary access as an alternative. Secondary access is not an alternative; it is a code requirement. The DEIS recognizes that the secondary access would make a safer situation, stating in section 4.2.1.6 that: "Having more than one evacuation route provides redundancy and increased safety, particularly during unexpected or fast-moving events." Yet, the developer argues that providing a single "wider" 28-foot access road will make up for the danger of not having an emergency exit. This offering of a single "wider" road is misleading. The current Mission Ridge Road is 28 feet wide and is not adequate for the proposed development's traffic. The proposed "wider" road is the same width as the existing road and won't even meet minimum County standards. Chelan County should not bend its rules on secondary access

to benefit a developer at the jeopardy of the safety of residents and visitors of the development he wants to build.

WDFW Land Exchange: Section 25 is owned by the Washington State Department of Fish and Wildlife and encompasses Windy Ridge and Bowl 4, the upper half of Chair 4, and overlaps with the proposed project. Per the DEIS, WDFW said: "...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." Hunters use the section during archery and rifle seasons as well as for forest grouse hunting. Mule deer, Colockum Elk, golden eagles, goshawks, pika, marmots, bobcats, mountain lions, coyotes, and black bears regularly use the section's wildlife corridors. Section 25's whitebark pine forests, springs and wetlands, talus slopes, and undisturbed shrub-steppe openings are vital wildlife habitats. This section grows more important as development threatens to destroy similar habitats on adjacent parcels. The DEIS discusses a land exchange between WDFW and Washington State DNR that would result in DNR owning Section 25 and implying that an expanded year-round resort would be allowable on DNR-owned Section 25. However, the DEIS further states that: "The land swap is not part of the current Proposed Project...". With the land exchange not on the table, the likelihood that it is illegal for DFW to swap the land, and DFW indicating that expanded year-round activity is not an allowable use of Section 25, Section 25 should be excluded from any expanded ski resort or development activity.

Master Planned Resort Overlay: Without the Master Planned Resort Overlay (MPR), the proposed level of development would violate the Urban Growth Act and could not be allowed. The developer is depending on this land use strategy which allows dense urban-style development outside the urban growth boundary. Despite depending on this planning tool, the development violates the requirements of MPRs including: Impacts are not fully mitigated, costs of public services are not fully borne by the developer, the development is not primarily a destination resort, is not self-contained, does not consist of short-term visitor accommodations, does not consider affordable employee housing, and does not preserve the rural character or natural resource it uses. Since the proposal does not meet the requirements for an MPR, the development should not benefit from the housing density allowed by an MPR.

These are just a few of the unclear, misleading, untrue, incomplete, arbitrary, and persuasive statements in the DEIS. I strongly encourage Chelan County to stick to established codes and not bend the rules for the benefit of a developer. Since the development breaks County Codes, I urge you to select the No-Action Alternative, which is the only alternative besides the full development build-out that is presented in the DEIS.

Mission Ridge is a very special place that still has remnants of a local home hill feel. As it has become more crowded it has become less of what has made it so special, thank you for considering my comments!

Sincerely, Dan Kravig and Kim Marchmonte 820 South Lamplight Lane East Wenatchee, WA 98802

From: <u>ljhoke@nwi.net</u>

To: missionridgeeis@outlook.com
Subject: Mission Ridge Expansion

Date: Sunday, October 5, 2025 8:23:51 AM

October 5, 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

The proposed expansion would include 621 condominiums, townhouses, and duplexes; 265 single-family units; 57-room lodge; dorm-style housing for 80 employees; 110,000 square feet for restaurants, skier services, retail and specialty shops, bars and office space.

On substandard roads, this would mean up to 10,000 cars per day, up to 7812 more beds in the area, 4000 people at one time (nearly 2x Leavenworth population), parking for 5500 people and 100,000 additional annual skier visits. We live up Pitcher Canyon and getting on to Squilchuck Road and driving up to Mission Ridge would be a night mare.

This project is all about money and new tax revenue, we love the area for it's natural beauty which will all be destroyed with this project.

Over development of a residential community may present safety hazards concerning secondary access and wildfire risks, increased sediment delivery, erosion, and flow, decrease in water quality and loss of riparian vegetation and habitat during the time of construction and from 1 to 5 years after construction.

Most of the Project Area is at high risk of surface erosion and landslides. Mission Ridge Road is a two-lane asphalt road that was recently improved in 2007 and typically needs annual repairs due to sinking, sloughing and slides.

PFAS contamination from ski wax occurs as the fluorinated wax abrades during skiing, releasing micro-particles and fumes into the environment. These PFAS, known as "forever chemicals" due to their persistence, then enter snow, soil, and eventually water sources, posing risks to ecosystems, aquatic species and human health. Exposure can happen through inhaling vapors during waxing or skin absorption, with studies showing elevated PFAS levels in skiers, particularly ski technicians, and in the snow and soil at ski areas.

Habitat loss and disturbance to wildlife, elk migration and possible loss of sensitive species including the pika.

Please rethink what you are proposing, Linda and Duane Hokanson From: <u>Julanne Burts</u>

To: <u>missionridgeeis@outlook.com</u>
Subject: Mission ridge expansion

Date: Monday, September 8, 2025 8:16:04 PM

I would say no to this for several reasons. I grew up here and moved back 24 years ago. Our valley can't even handle traffic now. In a few years if population increases which it will we will be gridlocked. It will take longer to go a short distance. The George Seller bridge was not meant to handle the traffic.

Our valley is getting more and more expensive to live in. We will soon be another chelan with massive amount of tourists with roads that will not be able to handle it. This resort will not be for the community it will only draw out of town seattle people. At some point Our area I'm afraid will push out people that will not be able to afford to live here. It's already going that way.

Thank you Julanne Burts 509 8602886 21 rowan st east wenatchee From: K Retzel

To: <u>missionridgeeis@outlook.com</u>

Subject: Mission Ridge Expansion Master Planned Resort Date: Monday, September 8, 2025 2:55:38 PM

Your proposition called the "Mission Ridge Expansion Master Planned Resort" is untenable due to one word: FIRE. You are not only placing additional lives at stake for those living in additional townhouses and working in commercial shops with your proposed plan under the more constant threat of wildfire but also the lives of the firefighters who would have to come to protect the precious buildings in a wildland forest setting and try with their best efforts to save as many lives as they could. A reservoir or two or three with millions of gallons of water and even a local fire station will not be enough to quench a fire that grows uncontrollably under our more regular high temperatures, low humidity, drought conditions with an additional wind factor at play. That is due to climate change which your proposition clearly does not address. Note if you have not the nearby Beehive Reservoir fire called the Mission Ridge Fire this early September which threatened peoples' lives and properties. You might recall the recent fires in memory where the Mountain High Ski Resort in Southern California had major damage in September 2024 and the Sierra-at-Tahoe ski area also in California was badly devastated by the Caldor Fire in 2021, just to name a couple incidents. That does not include the numerous cities and towns in areas where geographical features (such as hard-to-reach mountainous locations) made fires extremely difficult to contain. Mission Ridge Ski & Board Resort is located in a dangerous setting with only a one road exit from fire. The area is becoming more prone to large landslides and there is the potential for one of these slides to block the key road at a very crucial time for escape.

I have been an experienced wildland firefighter, trained and educated others about wildfires through a long career in public government service, living and working in Chelan County and nearby areas. I have been to Mission Ridge mega times and also, I was a temporary employee. I have survived wildland fires and I know that I am addressing a real concern about fire that will impact the area in your proposition. Liability is also a large component in today's world, and the very increased footprint upon the Mission Ridge area will likely bring about the probability of property (buildings, etc.) damage, injury or death to people where circumstances cannot be fully manipulated by any person or firm, as in the case with fire. Lawsuits would follow the aftermath of tragic events.

Perhaps the present lodge can be renovated or enlarged at its present site. After all, people from all over are being drawn to the uniqueness of Mission Ridge. It already has superior ski runs with even the high-tech quad-lift at the top of the mountain and a restaurant midway up. The whole area is supposed to be available to all, and that includes people who just want to see nature firsthand, by viewing the grand views or doing a fun hike. A larger mass of buildings and people there year-round will spoil and destroy the setting for everyone. All of the planned infrastructure will change the feel and appearance of this special place forever. Nature of its own fragility at Mission Ridge needs to be protected. No matter what the Chelan County Natural Resources Department has rubber-stamped to push this proposition forward, it should be

dropped by common sense and practicality.

Concerned citizen - Kerry Retzel

Email: den7isdt@yahoo.com

From: shelle finch

To: <u>missionridgeeis@outlook.com</u>

Subject: Expansion

Date: Monday, September 8, 2025 12:56:57 PM

Just wanting a clarification. Will there be a new road?

Sent from my Verizon, Samsung Galaxy smartphone Get <u>Outlook for Android</u> I writie to respectfully urge selection of the **No Action Alternative** for the proposed Mission Ridge development. The Draft Environmental Impact Statement (DEIS) fails to adequately address potential impacts to wildlife, habitat connectivity, and public safety, and does not comply with Chelan County's standards for responsible and sustainable growth.

The Mission Ridge area encompasses critical habitat for mule deer, elk, and wide-ranging carnivores such as black bears and cougars. It also supports several species of greatest conservation need, including northern goshawks, golden eagles, whitebark pine, and American pika. The mountain and shrub-steppe transition zones within this landscape are highly sensitive to disturbance and function as essential ecological corridors for seasonal migration and climate adaptation. Fragmentation of these connected habitats would result in long-term degradation of wildlife movement patterns, watershed function, and overall ecosystem resilience.

The foothills and forested slopes surrounding Mission Ridge form part of a broader ecological continuum linking the Cascade Crest to the Columbia Basin. Maintaining the integrity of this network is vital to sustaining not only native wildlife populations but also the resilience of forests and watersheds increasingly stressed by drought, extreme heat, and wildfire under changing climatic conditions.

The DEIS also failed to adequately address critical non-remediable issues such as adequate domestic water supply in light of ecological warming, snow run off in light of developmental expansion, traffic corridors and patterns in light of insufficient roads, safety in light of seasonal wildfire, and infrastructure services in light of current strained budgets.

The proposed development's reliance on exceptions to Chelan County land use codes would permit expanded human activity in a high-elevation, fire-prone environment. Such expansion would increase wildfire risk, place additional demands on emergency response capacity, and compromise sensitive habitats that are already under pressure. These risks underscore the purpose of the County's planning and environmental review standards: to protect both public safety and ecological integrity.

Selecting the **No Action Alternative** would uphold Chelan County's established growth management principles and demonstrate a commitment to balancing community development with long-term environmental stewardship. Responsible planning requires recognizing that ecological health and public safety are integral components of sustainable community wellbeing.

I respectfully request that the County prioritize protection of the Mission Ridge landscape to ensure the continued viability of its wildlife, watersheds, and natural character for current and future generations. If you do so, the inevitable conclusion is a decision to deny this ill conceived and poorly reasoned project.

Please acknowledge your receipt of this document.

Scott Kane

From: Mike Kaputa

To: <u>Daniel Chang; Dan Haller</u> **Subject:** FW: Mission Ridge expansion

Date: Wednesday, October 15, 2025 4:27:01 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have any suspicion, please confirm with the sender verbally that this email is authentic. If you suspect fraud, click "Phish Alert Report."

Hi Daniel. Here's a Mission Ridge comment that came to me directly, apparently....thanks.....Mike

Mike Kaputa, Director Chelan County Natural Resources Department 411 Washington Street, Suite 201 Wenatchee, WA 98801 (509) 670-6935

From: Dan Dietzman <dbdietzman@hotmail.com> **Sent:** Wednesday, October 15, 2025 11:50 AM **To:** Mike Kaputa <Mike.Kaputa@CO.CHELAN.WA.US>

Subject: Mission Ridge expansion

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FOMR Comment Template

10/15/2025

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

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Thank you for considering my comments.

Daniel Dietzman 1900 Grandview loop Wenatchee Wa 98801

Sent from my iPhone