

February 2, 2022

Chelan County Department of Community Development
411 Washington Street, Suite 201
Wenatchee, WA 98801

**Re: Revised Application, SEPA Checklist, and Request for New SEPA Threshold Determination for
Mission Ridge Master Planned Resort Expansion, Chelan County File No. MPR 2018-128**

Dear SEPA Responsible Official,

We hope this finds you well! Enclosed please find a revised / amended SEPA Checklist and supporting materials for the Mission Ridge Master Planned Resort Expansion, Chelan County File No. MPR 2018-128 (the "Project"). The enclosed materials provide new information and change and clarify the proposal described in the January 17, 2020 SEPA checklist that is the subject of the County's May 19, 2020 SEPA threshold Determination of Significance (DS). In addition to new, clarified, and changed information within the SEPA checklist, the Project narrative and site plans have been revised to reflect:

- Inclusion of 267 additional acres of designated, protected open space, which will be part of the Project's conservation area pursuant to CCC 11.89.060;
- Elimination of 10 dwelling units from Phase 5;
- Significant increase in designated, protected open space from 70% to approximately 80% of the Project site; and
- Significant reduction in the overall proposed density (from 2 units / acre to 1.3 units / acre).

The SEPA checklist and Project narrative also have been revised to reflect additional reports, studies, and set forth in the following new reports/addendums, which are being submitted at this time:

- Revised General Land Use application (dated February 1, 2022)
- Appendix B – TIA Addendum (dated October 7, 2021)
- Appendix I – Power Needs Analysis Report (dated January 18, 2022)
- Appendix J – Water Resources Memorandum (dated January 20, 2022)

Attached to this letter, please find a table, which summarizes the new information, changes to existing materials, and clarifies which studies and information are not being revised as part of this submittal.

Pursuant to WAC 197-11-350(2) and Chelan County Code (CCC) 13.04.110(5), we respectfully request that the County issue a new threshold determination based upon our changed and clarified proposal and the revised / amended SEPA checklist. We note that over the roughly 35 years since the original FEIS for the Mission Ridge project was prepared and published the County has adopted significant environmental regulations, such as its Critical Areas Overlay District, CCC Chapter 11.77. In issuing a new threshold determination, we request that the County both identify the Project's specific probable adverse environmental impacts and determine whether the impacts have been identified and addressed in County planning documents, development regulations or other local, state and federal rules or law as required by WAC 197-11-158(2) and CCC 13.04.020. To aid you in making this evaluation, we have enclosed a matrix of impacts identified in the County's draft EIS Scoping summary with references to the County codes and applicable regulations that mitigate potential impacts.

Prior to issuing a new SEPA threshold determination, we respectfully request that, as much as possible, the County assist us with identification of specific adverse impacts to the extent necessary to formulate mitigation measures per CCC 13.04.110(4). We specifically ask that the County consider mitigation measures that the

County may require and those we will implement. We have revised / amended the SEPA checklist to provide more detail about proposed mitigation, per CCC 13.04.110(5)(C) and will provide additional information and detail upon request as part of the process envisioned under CCC 13.04.110(4).

Finally, pursuant to WAC 197-11-350(2) and CCC 13.04.110(2), we respectfully request early notice of whether a DS is likely under WAC 197-11-350 for the new threshold determination.

Thank you for your attention to and assistance with this matter. Please do not hesitate to contact us, if you have questions or need additional information.

Respectfully yours,



Clay White
Director of Planning
LDC, Inc.

Enclosures:

- February 1, 2022 - Revised General Land Use application
- February 1, 2022 – Submittal Transmittal
- February 1, 2022 – Revised SEPA Checklist
- February 1, 2022 – Revised Project Narrative
- January 7, 2022 – Revised Site Plan set
- November 7, 2021 – Traffic Impact Analysis - Addendum to Appendix B
- January 18, 2022 – Power Needs Analysis (NEW) – Appendix I
- January 20, 2022 – Water Resources Study (NEW) – Appendix J

Overview of Substantive Revisions to Project Narrative, Site Plans, SEPA Checklist	
Project Narrative	Project Overview: <ul style="list-style-type: none">• Updated to reflect increased project area due to significant increase (~267 acres) of new conservation area (page 4)• Planned Residential and Commercial Breakdown by Phase Table modified to reflect elimination of 10 Single Family Detached Units in Phase 5 (page 5)• Additional information on Project density (page 6)• Additional information regarding Project open space and new conservation area. (page 6)• Revised timeline for project permitting and Project Phases 1-5 (page 7 and 18)• Project Fact Sheet updated to reflect new areas being included within Project boundaries, new and updated appendices, and reduction in total dwelling units (page 8-9)• Site plan exhibits have been updated to reflect updated Project boundaries and removal of 10 dwelling units (throughout narrative)• New information on water demand, source and usage in Information references Appendix J (page 22-24)• New information on electric power in Information references Appendix I (page 23)• New information and overview from the updated TIA addendum (page 26-28)• Modifications and new information added to tables (pages 34-38 and 40-45)

Site Plans	<p>Each of the Site Plans were modified to show:</p> <ul style="list-style-type: none"> • Revised Project boundary • Inclusion of additional open space/conservation areas • Removal of ten dwelling units from Phase 5 of the development.
SEPA Checklist	<p>A. Background</p> <ul style="list-style-type: none"> • 6. Revised project permitting timeline and Project Phases 1-5 • 8. References to additional reports and addenda included with submittal • 8. References to Chelan County Code (CCC) development regulations that mitigate Project impacts • 8. References to CCC Chapter 13.04 and WAC 197-11-158, which provide that when additional mitigation is not required where a GMA county's comprehensive plan, subarea plan, or development regulations adequately address a project's probable specific adverse environmental impacts • 10. Modification to list of government approvals / permits needed for the Project • 11. Revisions to total project acreage with the inclusion of new conservation area and additional language added regarding previously submitted Development Agreement and the Development Agreement standards and procedures • 11. Revisions to Phasing table to reflect elimination of 10 single family detached units in Phase 5 • 11. Additional information regarding proposed density • 11. Additional information regarding proposed open space and new conservation area <p>B. Environmental Elements - Earth</p> <ul style="list-style-type: none"> • 1.e. Additional information regarding purpose, type, total area and approximate quantities and total affected area by proposed filling, excavation, and grading • 1.f. Additional information and references to Geotechnical Hazards Report (Appendix F) and proposed mitigation, findings, and conditions and reference to Chelan County Code 11.86 compliance with which will mitigate erosion impacts • 1.g. Updated information provided on impervious surfaces and changes to reflect addition of new conservation area • 1.h. New information provided outlining the requirements under CCC 11.86 compliance with which will mitigate erosion impacts and references to new, additional information on proposed mitigation within Appendix F <p>C. Environmental Elements – Air</p> <ul style="list-style-type: none"> • 2.a. Revised information confirm that the Project will be required to meet state Department of Ecology Air Quality standards under Chapter 70.94 RCW • 2.c. Additional information regarding DOE emissions requirements and measures to reduce emissions or impacts to the air <p>D. Environmental Elements – Water</p> <ul style="list-style-type: none"> • Overview - Significant new information provided on water resources, per Appendix J, the new Water Resources Existing Conditions Report • a.1). Additional information provided confirming Project will meet the requirements of CCC Chapter 11.77, the critical areas overlay ordinance, which outlines the critical area permitting requirements and mitigation sequencing • a.2). Significant new information from Appendix E as it relates to any work within 200 feet of surface waters, including specific information on how the project will comply with CCC 11.80.070 for wetland mitigation • b.1). Significant new information on water resources, per Appendix J, the new Water Resources Existing Conditions Report

- b.2). Additional information regarding the Large on-Site Sewage (LOSS) systems compliance with design requirements, installation requirements, and operation requirements as required and mitigated for under state law and information to confirm that stormwater treatment is reviewed, regulated, and mitigated under CCC Chapters 13.16 and 13.18.
- c.1). Updated to reflect that stormwater treatment is reviewed, regulated, and mitigated under CCC Chapters 13.16 and 13.18.
- c.3). Updated to reflect that stormwater treatment is reviewed, regulated, and mitigated under CCC Chapters 13.16 and 13.18.

E. Environmental Elements – Plants

- b. Vegetation and disturbance information updated to reflect updated project area and acreage, including confirmation that vegetation removal, replanting, and disturbance is regulated and mitigated under CCC Chapters 11.77 and 11.80, CCC 11.89.050 and CCC Chapter 15.50
- c. Updated information to reflect that project mitigation, beyond that already provided for in the application, will be determined through development of the Habitat Management and Mitigation Plan in coordination with WDFW pursuant to the requirements of CCC Chapter 11.78.
- d. Updated information referencing Page 43 of Appendix E, which outlines mitigation measures for plant species, and confirmation that landscaping will be required to meet the requirements of CCC Chapter 15.50 (Landscape Standards)
- e. Updated with specific mitigation measures that can be implemented to preserve and enhance vegetation and mitigate adverse impacts

F. Environmental Elements – Animals

- a. Additional information provided on wildlife species that potentially occur within the vicinity of the Project area, per Appendix E, including references to page 39 of Appendix E, which discusses mitigation measure for wildlife species, and page 34 of Appendix E, which discusses mitigation measures for potential impacts on Elk Calving areas, and confirmation that the Project will meet the requirements of CCC Chapter 11.78 (Fish and Wildlife Habitat Conservation Areas Overlay District) and mitigated impacts to wildlife and habitat
- d. Additional information confirming that, per CCC 11.78.060, a habitat management and mitigation plan (HMMP) for plant, fish and wildlife habitat conservation areas will be prepared through a collaborative process with Chelan County, WDFW and the applicant. Although the preliminary assessment (Appendix E) did not identify any adverse impacts to species of concern (WDFW or USFS), the HMMP would focus on describing potential impacts to riparian habitat, listed or sensitive plant species, elk and mule deer habitat and populations in the Project area at a Project specific scale. The HMMP would also identify any mitigation measures appropriate to the scale of potential impacts. Impact analyses relative to elk would apply the best available science as identified by WDFW, through the WCSI (2017) elk habitat model and recently completed literature review (Gaines et al. 2020). The HMMP would be completed and approved prior to commencement of Phase 1.

G. Environment Elements – Energy and Natural Resources

- a. Additional information summarizing and referencing the newly submitted Power Needs Analysis, Appendix I, which confirm that the Chelan PUD has power available for the Project, and a new substation will not be required.

H. Environment Elements – Environmental Health

- a.1)-3). Additional provided for each question confirming that there is no known or possible contamination at the site from present or past uses and that no known existing hazardous chemicals/conditions that might affect Project development and design or that will be stored, used, or produced onsite
- a.4). Additional information provided on emergency services that might be required for the project.
- B.2) Additional information provided on noise including how noise impacts are regulated under CCC Chapter 7.35 and CCC 11.88.190 as well as proposed conditions to mitigate noise impacts per the Chelan County Code

I. Environment Elements – Land and Shoreline Use

- b., e., and f. Additional information confirming that those areas zoned Commercial Forest Land (CF) will all be located within a conservation area and protected under the open space requirements outlined in CCC Chapter 11.89
- h. Additional information conforming that all future development will be required to meet the requirements of CCC Chapter 11.80, which will and mitigate any Project impacts below a level of significance

J. Environment Elements – Land and Shoreline Use

- c. Additional information regarding resort concept per Project, including landscaping standards consistent with CCC Chapters 11.89 and 15.50, and confirmation that signage will be developed in accordance with the standards adopted in CCC Chapters 11.89 and 11.92

K. Environment Elements – Light and Glare

- d. New information confirming that light and glare impacts will be mitigated through the requirements of CCC 11.88.08, including requirements that parking lot lights, security lights, or any exterior lighting shall be low-intensity, non-flashing and designed to project toward the property or shall be shielded to keep light from directly projecting over property lines

L. Environment Elements – Transportation

- d. Additional information referencing the October 7, 2021 TIA Addendum, included as part of Appendix B, which identifies additional mitigation measures and conditions and provides a full response to comments received from the City of Wenatchee and WSDOT, including mini-roundabout improvements for the Crawford Avenue intersections to operate at acceptable levels of service

M. Environment Elements – Public Services

- a. Fire - Additional information referencing the mitigation and proposed conditions in Appendix D (Fire Protection Plan)
- a. Schools – Additional information confirming that, per CCC 11.89.010 and RCW 36.70A.360, the Project as a Master Planned Resort is focused on providing short-term visitor accommodations associated with a broad range of on-site recreational facilities and short-term accommodations built in five phases over 20 years, resulting in minimal impacts to schools and will still provide property taxes to support schools. School bus turnarounds will be planned for during development phases, if bus services are provided by the school district, in coordination with the School District during each phase of development.

N. Environment Elements – Utilities

- Updated information, including references to newly submitted Appendix I (Power Needs Analysis) and Appendix J (Water Resources Memorandum).

New Reports or Addendum materials	
Revised General Land Use application	February 1, 2022
Appendix B – TIA Addendum	October 7, 2021
Appendix I – Power Needs Analysis Report	January 18, 2022
Appendix J – Water Resources Memorandum	January 20, 2022

Elements of the Project not Amended with this Submittal	
Appendix A – Historical SEPA information dated	April 2018
Appendix C – Cultural Resources Report	December 30, 2019
Appendix D – Fire Protection Plan	December 17, 2019
Appendix E – Aquatics, Wildlife, and Botany Resources Report	January 6, 2020
Appendix F – Geotechnical Hazards Report	December 19, 2019
Appendix G – Hydrology Memorandum	December 31, 2019
Appendix H – Economic Significance Report	December 2019
Draft Development Agreement	January 16, 2020