

March 20, 2020

RJ Lott, Planning Manager
RJ.Lott@co.chelan.wa.us
Department of Community Development
316 Washington ST. STE 301
Wenatchee, WA 98801

RE: Proposed Development near Mission Ridge
Water Concerns

Dear RJ Lott,

The board of directors of the Squilchuck-Miller Water Users Corporation (Miller), the Squilchuck Water Users Association (Flood), and the Beehive Irrigation District (Beehive) appreciate the opportunity to comment on the proposed development in Section 19 near Mission Ridge. The District is concerned with protecting the quantity and quality of water that flows in Squilchuck Creek. In order to understand our concern, an understanding of the existing water use and scarcity is required. The water rights in the Squilchuck drainage are complicated and additional water groups exist outside of our management. A description of the three groups managed by this office follows:

MILLER

Miller Corporation manages senior Class 1 water rights adjudicated by decree in 1928 and which are held by 144 distinct shareholders. There are a total of 400.5 shares, which equate to a required total stream flow of 8.01 cubic feet per second (cfs). Squilchuck Creek routinely flows below 8.01 cfs and when the streamflow at the downstream end of the Miller user-group area is insufficient to satisfy downstream water rights, the corporation cuts all user's water rights equally by decreasing diversions to individual water systems. These cuts occur regularly and are sometimes very significant. Cuts have been made to Miller rights in 10 years out of the last 20. Recent significant cuts include:

YEAR	Percent cut to Miller right
1977	90% Cut
1994	60% Cut
2001	90% Cut
2005	60% Cut
2008	40% Cut
2015	50% Cut

Notice that in two years in the last 43, the cut has been 90%. This is a very significant operational challenge for the water users who depend on their water rights for crop irrigation or other agricultural use. The main point to understand is that it is rare for streamflow in Squilchuck Creek to be sufficient throughout the irrigation season to satisfy the most senior adjudicated water rights in the Squilchuck drainage.

FLOOD

The Flood association manages junior Class 28 water rights which are held by 50 distinct shareholders in the Squilchuck drainage. There are a total of 364 shares which equate to a streamflow of 7.28 cfs. During spring runoff, when streamflow exceeds the Miller flow of 8.01cfs, water users with Flood shares may divert their water right into their systems. As soon as Miller rights are impeded by declining flow, Flood rights are cut to zero. Duration of Flood water availability varies but generally extends through July.

BEEHIVE

In order to address the water stress due to insufficient flow to satisfy Miller water rights, the Beehive Irrigation District was formed in 1953 and Beehive Reservoir was constructed. The District has 73 distinct shareholders who hold rights to 223 shares of Beehive water. Each share entitles the owner to flow one miner's inch (.02 cfs) for one month. Beehive has a water right with a priority date of 1929 to divert 3.0 cfs and up to 300 acre feet per year. The reservoir has an active storage capacity at the spillway crest of 260 acre feet. Diversion to fill the reservoir is allowed from October 1 through May 1. This fill period occurs during the low flow portion of the year when creek flows seldom support the full 3 cfs fill right. Often in winter, the entire combined flow of Lake Creek and Squilchuck Creek is below 2 cfs. In addition to the fill limitation based on creek flow, the Beehive fill period is coincident with the junior Mission Ridge Snow Making Reservoir fill right which occurs over roughly the same period. By right, Beehive could divert the entire stream flow up to 3 cfs toward the Beehive Reservoir leaving nothing to be diverted toward the Mission Ridge reservoir. However, in practice, Beehive has coordinated closely with Mission Ridge to ensure that both reservoirs may be filled during the fill period. Some years, the District is able to fill the reservoir early with available stream flow. In low flow years, or when extra cooperation is required with Mission Ridge, the District struggles to fill the reservoir before the fill period ends.

Once Miller water has been cut, Beehive shareholders may call for their Beehive water to be diverted from the reservoir into the drainage, and then from the drainage into their individual system. This supplemental water is added to their reduced (cut) Miller shares to provide adequate flow to meet irrigation needs. Beehive Irrigation District exists because the stream flow in Squilchuck Creek is not perpetually adequate to satisfy senior Miller water rights. On drought years, the reservoir is drained, sometimes proving barely adequate of volume to meet all user's needs.

OUR CONCERNS

We hope that the descriptions of the water groups and their operations demonstrate that the water balance is precarious and barely sufficient under current demands in the Squilchuck drainage. We take specific issue with the water quantity description provided in the project narrative and the logic and conclusions of the Hydrology Memorandum Appendix G.

WATER QUANTITY

Under Section I, Infrastructure, subsection i, Water Supply, of the revised project narrative, the applicant estimates a domestic use quantity of 90 acre feet. We assume this is an annual quantity. This quantity is over a third the volume of Beehive Reservoir and is significant. Further, in the same narrative section, the applicant states that the *“final quantity of water needed for domestic use is not known..”* The additional volume of water required for fire protection, irrigation and snowmaking is unclear to us. In fact, according to the Chelan County PUD’s water use calculator, each single family residence will use 120,085 gallons of water per year. This quantity times 275 homes equals 101 acre feet, which exceeds the estimated 90 acre-feet without accounting for 621 multi-family units, 80 employee housing units, a 57 room hotel, and 110,000 square feet of commercial space. It appears that the total amount of water required to support this development could be considerably greater than the estimated 90 acre feet.

COMPARISON BETWEEN YOUR HOUSEHOLD AND THE AVERAGE* HOUSEHOLD IN THE PUD'S WENATCHEE SERVICE AREA

	Your House	Wenatchee Average
Interior per household gallons per day	<input type="text"/>	172
Exterior per household gallons per day	<input type="text"/>	157
Total Gallons of Water Used in the House		
	Per Day	Per Month
Your Household	<input type="text"/>	<input type="text"/>
Wenatchee Average	329	9,870
	Per Year	
		120,085

COMMENTS. Every year, your household uses ** gallons per capita LESS water than the average household in Chelan PUD's Wenatchee service area. For information about your exact water use (if you are a PUD customer) or how to reduce water consumption, call (509) 661-8908.

Figure 1 – PUD Water Use Calculator

We believe the actual quantity of water required to support the development plan is important and deserves a better description defining how much water will be required and at what times of the year. We believe the proposal should not be approved while water use quantity and timing is unknown.

WATER QUALITY

The proposal indicates dispersed drainfields will be used to dispose of wastewater. Orchardists in the Squilchuck drainage irrigate with surface water from Squilchuck Creek. The water is tested on a regular basis during growing season for compliance with legislated food safety standards. If the water fails the quality tests, fruit cannot be picked. We are concerned that wastewater produced by a community similar in size to Cashmere could contaminate the surface water and jeopardize the livelihood of current water rights holders.

HYDROLOGY MEMORANDUM

The memorandum states that the development intends to drill wells into deep bedrock aquifers that are hydraulically connected with surface water and which "may be the source for the intermittent creeks, and as such can be inferred to be within the same hydrologic water budget." We interpret this to mean that any water taken by the development will directly impact stream flow in Squilchuck Creek. Further, the affected reach is the entire stream below the ski area and all users will be affected. We see flaws in the hydrology memorandum as follows:

DE MINIMUS

On page 7 under Hydrogeologic Conceptual Model, the document states:

"Water during summer and fall months will be de minimus at the proposed development. Therefore, it is inferred that the proposed development, which will have highest demand during spring and winter months, will not have a major effect on the water budget within the basin."

Water removed from the drainage in any quantity is not a "de minimus" issue to our water users who already suffer regular and significant cuts to their water rights due to insufficient flow during summer months. These cuts are up to 90%. Without a proposal defining the proposed resort's summer water use, we are unable to evaluate the effect on stream flows. We do know that removal of any additional water during Miller cuts affects every existing water user by requiring further cuts.

TIME OF USE AND AVAILABILITY

On page 7 under Conclusions, the document states *"Proposed water use at the expansion project will primarily occur during winter and spring months when water is most available."*

We understand the proposed resort to be for year round use and question the premise of this statement. We understand that occupants of the new community will be consuming water in the summer months when stream flow is in highest demand for agricultural uses. In addition, water is not most available in winter months. Stream flows are low and winter is the fill season for the Beehive Reservoir in competition with the Mission Ridge Snowmaking Reservoir. As described above, filling Beehive Reservoir in cooperation with Mission Ridge's current filling operations is a challenge with the reservoir only just barely being filled in time in many years. In our opinion there is no available water to be allocated on a regular and reliable basis beyond the current reservoir fill requirements during winter months between October 1 and May 1.

EARLIER AND MORE SEVERE CUTS

Also on page 7 under Conclusions, the document states *"Proposed snow making, a non consumptive use, will also be a benefit to creek flows in spring and summer months, by allowing snow pack melt to the creeks."*

We appreciate the effect of manmade snow in extending the flood season. In fact in 2015, a drought year, Beehive Irrigation worked with Mission Ridge to increase snow making for the benefit of stream flows. However, the benefit of manmade snow only lasts until the snow melts. Even utilizing the snowmaking strategy in 2015, Miller water was still cut by 50% that summer. It appears to us that continuous draw by the development during summer months will result in earlier and more severe cuts to Miller water users. It is our opinion that no additional water is available to provide new water rights or to support pumping from the aquifer for new consumptive uses. This opinion is supported by the WRIA 40A Watershed Plan dated May 2007 which states in the findings that "...most of the physically available water (runoff of precipitation, shallow groundwater, imported water) entering the WRIA 40A is withdrawn for beneficial uses." and "Annual water rights are about 50% greater than the estimated quantity of physically available water. Water diverted for new storage may potentially impair senior rights and/or require mitigation of impacts to senior rights."

OUR REQUEST

We ask that the County protect existing water users in the Squilchuck drainage by implementing the following:

1. Require a stream flow study that compares current use and flow in Squilchuck Creek to the conditions expected at build out. This study should clearly outline the operational plan for pumping, storing, and using water throughout the entire year and should consider water use by existing water rights holders. If the study shows that insufficient flow exists to support current use plus the development, then the development should not be allowed to draw water from the aquifer.
2. Reject the WNR Group Hydrology Memorandum conclusion that removing 90 acre feet (or more) will not have a major effect on the water budget within the basin. This conclusion is based on the absence of any water quantity discussion and the faulty premise that water use by the proposed resort will be "de minimus" during summer and fall months. Removal of any quantity from a stressed system creates hardship on all downstream users. This conclusion is supported by the WRIA 40A findings.
3. Provide a water rights study including priority dates that supports removing additional water with junior rights from an already spoken for water budget. The County should affirm the priority of water rights and if senior rights would prevent water use by the development, then an alternate water source should be required.

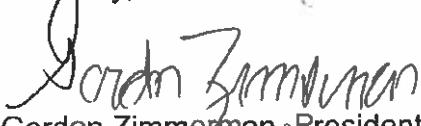
We believe that the proposal's conclusions regarding effect on streamflow are inaccurate and that continuous removal of water from headwaters of the Squilchuck Creek will result in earlier and more severe cuts to the Miller water and will threaten the ability of Beehive Irrigation District to fill the Beehive Reservoir within the allowed fill window.

We are concerned that even though the water rights we manage are senior to the proposed use, that once built, the needs of the proposed community will be held above the existing rights of irrigators in the drainage and that our user group will be irreparably damaged.

Our opinion is that no extra water exists within the water budget and that the resort should not be allowed to deplete the aquifers that feed the Squilchuck surface waters. We suggest PUD water as an acceptable alternate.

Thank you for considering our comments.

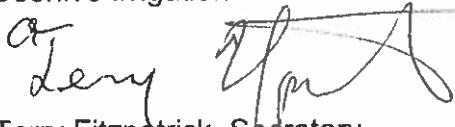
Sincerely,



Gordon Zimmerman, President
Beehive Irrigation District Board of Directors



Norm Gutzwiler, Vice President
Beehive Irrigation District Board of Directors



Terry Fitzpatrick, Secretary
Beehive Irrigation District Board of Directors

Pc:

Mark C. Shuppe, Watermaster, Department of Ecology
Mike Kaputa, Director, Chelan County Natural Resource Department

From: [Marla Fox](#)
To: [RJ Lott](#); [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#)
Subject: Comment on Mission Ridge Expansion Application
Date: Thursday, March 26, 2020 11:56:33 AM
Attachments: [2020 03 25 Wenatchee Ski Development Comment.pdf](#)

External Email Warning! This email originated from outside of Chelan County.

Hello,

Attached please find a public comment on the Mission Ridge Expansion Application.

Thank you,
Marla Fox

From: [Marla Fox](#)
To: [RJ Lott](#); [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#)
Subject: Comment on Mission Ridge Expansion Application
Date: Thursday, March 26, 2020 11:56:33 AM
Attachments: [2020 03 25 Wenatchee Ski Development Comment.pdf](#)

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Hello,

Attached please find a public comment on the Mission Ridge Expansion Application.

Thank you,
Marla Fox

From: [Kevin Kane](#)
To: [RJ Lott](#); aruncus2@msn.cm
Subject: Comments Mission Ridge Proposed Expansion change in scope
Date: Tuesday, March 31, 2020 11:26:48 PM
Attachments: [Letter to county 3312020.docx](#)

External Email Warning! This email originated from outside of Chelan County.

Here are my comments on the proposal changes in the proposed MIssion Ridge Expansion.

Thank you for the opportunity to comment, A reply that you received is requested.

Kevin Kane

From: [Kevin Kane](#)
To: [RJ Lott](#); aruncus2@msn.cm
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Kevin Kane

From: [Lowell Skoog](#)
To: [RJ Lott](#)
Subject: Comments on Mission Ridge expansion plan, 2020
Date: Saturday, March 7, 2020 3:32:18 PM

External Email Warning! This email originated from outside of Chelan County.

7 March 2020

Dear Sir or Madam:

I would like to comment on the proposed expansion plan for Mission Ridge Ski Area currently under consideration by Chelan County and the U.S. Forest Service.

I am a Seattle resident and skier with many visits over the years to ski the lifts at Mission Ridge as well as the adjacent backcountry. I skied the chairlifts at Mission with several Wenatchee friends just a week ago. From my friends I heard about the proposed expansion plans and obtained more detailed information. My comments follow.

Summary:

I am concerned that the residential development proposal is too large and may be unsustainable in the long term. I am particularly concerned about fire safety and over-demand on available water sources. I feel that the proposal provides relatively minor improvements for recreational skiing, improvements that could be made without such a major residential development.

Specific Comments:

The proposal I'm reviewing is from Ecosign Mountain Resort Planners Ltd., dated 20 November 2019. It calls for 621 new Duplex/Condo/Townhome units, 275 Single Family Homes, 57 Lodge Rooms, and 80 beds for employee housing. Total Pillows estimated at 3800-4000, plus 11,000 square-feet of office space.

My first concern about the proposal regards fire safety. Wenatchee Mountain is dry, east-side forest. 2015 was the largest wildfire season in Washington state history. Homes around the town of Wenatchee were threatened and fire almost crossed Wenatchee Mountain from the heavily-burned southwest flank to the Squilchuck Basin where the ski area is located.

I believe that the proposed residential development would be indefensible in the event that fire swept through the Squilchuck Basin. I'm concerned that the single access road proposed for the new development would not be adequate to provide entry by firefighting resources, or exit by residents, in the event of a major fire.

I am also concerned about water sources for the proposed development. It's a dry area. Is there enough ground water in the area to support such a large development? Are there plans to pump water from another source, perhaps the Upper Wheeler Reservoir? It would be good to know what the plans are and how feasible they would be in light of other usage demands and expected climate change. The availability of water also bears on the risk posed to the development by wildfire.

I do think that the proposed ski lifts integrated with the proposal could be beneficial for Mission Ridge Ski Area. Mission doesn't have much beginner terrain, and I think the proposed Lift 8 would improve this. I'm not familiar enough with the terrain to judge what sort of skiing the proposed Lifts 6 and 7 would offer. These lift improvements, combined with a much smaller residential proposal, would be acceptable to me. I'm not in favor of the proposed Lift 5 because it would essentially eliminate the best backcountry skiing at Mission Ridge, into Stemilt Basin.

Beyond these site-specific comments, I'm concerned about the broader impact of the proposed development. It seems to me that the proposal is only minimally related to skiing and the ski area—it's chiefly a large, year-round real estate development. This will contribute substantially to traffic on the Squilchuck Creek road and will contribute to sprawl, generally, in the Wenatchee Valley. It probably won't contribute significantly to the viability of Mission Ridge as a ski area.

My conclusion is that the proposed development has significant environmental and safety issues that I would need to see addressed before I would consider supporting it.

Thank you for this opportunity to comment.

Lowell Skoog
1524 NE 88th Street
Seattle, WA 98115
lowell.skoog@alpenglow.org

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1524 NE 88th Street
Seattle, WA 98115
lowell.skoog@alpenglow.org

From: [Andy Dappen](#)
To: [RJ Lott](#)
Cc: [Bob Bugert](#)
Subject: Comments on Mission Ridge Proposed Expansion
Date: Friday, March 27, 2020 2:22:46 PM
Attachments: [MissionRidgeExpansion-LetterCounty2-Andy.docx](#)

External Email Warning! This email originated from outside of Chelan County.

March 27, 2020

RJ Lott, Planning Manager;
Community Development Department
316 Washington St., Suite 301
Wenatchee, WA 98801

Re: Mission Ridge Proposed Expansion

Mr. RJ Lott,

In October 2018, I submitted the attached letter in regards to Tamarack Saddle LLC's proposed plans to develop a new ski village immediately east of the Mission Ridge Ski Area. I've attached the old letter to this comment because the very same issue pertaining to wildfire still exists and have not been adequately addressed.

Particularly during the hottest, driest months of the fire season, the safety of village residents and visitors are endangered if the County does not follow its own codes by insisting that there be two separate means of entering and exiting the development. Failure to have secondary access not only threatens the lives of villagers during an emerging large wildfire, it all but ensures that regional and federal firefighting resources will not be sent to the village to protect property. This is because agencies will not endanger the lives of their firefighters by sending them into the fire trap this development presents. Approving the project as it stands now makes the County complicit in endangering people's lives and exposing those people to great financial loss. Someday major wildfire will sweep through this development just as wildfires have done in faraway places like Colorado, California, and Alberta, and just as wildfires have done in nearby places like Pateros and Wenatchee itself.

The fire protection plan for Tamarack Saddle's Project Application argues that section 104.8 of the International Fire Code (IFC) allows the fire code official to grant modifications for individual cases when the code is impractical. The noted section of the IFC very clearly states that modifications are allowed only when they do not threaten life and fire safety requirements. Clearly there is a threat to life and fire safety if a growing summer wildfire engulfs the one road (an entirely realistic scenario) and leaves the occupants of a development with 4,000 beds with absolutely no means of escape and no safe way for other resources to help.

Not only could the wildfire losses to this development be immense, but those losses could put the county on trial, morally and maybe even legally, if the codes are ignored when the region's own recent history, when nationally known fire experts, and when its own citizens have given the county fair warning that the project's measures for contending with wildfire are grossly inadequate.

I made this point in the first letter and have researched it slightly, and I believe it's a point the

County's legal counsel should not take lightly. If the project is approved with only one road in and out, and if a wildfire catastrophe causes loss of life and great financial loss of property, could the county be held liable and financially responsible for negligence in violating its own codes? Some lawyers I've interviewed say the county would be given governmental immunity. Other lawyers have not been so confident that the county would escape being sued. In a number of cases the Washington State Supreme Court have swept away the protection of governmental immunity when a county's disregard of codes have resulted in catastrophic loss to the public it was entrusted to protect.

I urge you not to put our county in any such a position by strictly adhering to all codes meant to protect the public as they apply to this development. Chelan County should review the proposal with a leaning toward safety and full compliance with code, rather than demonstrate a willingness to make exceptions that benefit the developer but put the community and county itself at risk.

Another major issue with the proposed development, which applies tangentially to fire, is water. Different Squilchuck irrigation districts report the summer water in the entire drainage is already maxed-out and that during low-water years the pre-existing water rights of residents and farmers in the Squilchuck Valley are already not being met. This project claims to draw its water from deep aquifers but those familiar with the hydrology of the drainage know that the shallow and the deep water are connected, and that drawing from deeper water steals from the shallow water. In summer as the development draws water for domestic use and for its fire-protection needs, it will take water from those with pre-existing rights and a tangle of legal issues the county contributed toward will ensue. Before approving this plan, insist that the developer produce a study from a non-partial firm (and one approved by the different irrigation districts), that proves this development will not impact the water rights of everyone downstream (which is virtually everyone else in the Squilchuck drainage).

Between 2018 and now my concerns with the proposed village have grown well beyond fire (and water). I'm concerned about how the development will impact the migration, calving, and mating of the Colockum elk herd, an issue I suspect the Wenatchee Sportsmen will address with more authority, but a resource many of us don't want negatively impacted by the resort's spring, summer, and fall use. I'm concerned how the development violates the fundamental principles behind the formation of the Stemilt Partnership, which was formed to keep future development from damaging the water, wildlife, and recreation of the upper Stemilt Basin – all of those elements will be greatly impacted by all the people this development brings to live and play in the woods.

I'm concerned about the impact on traffic – use of the Squilchuck Road, the proposal's own study shows, will grow five to six fold. Is it right that one developer's property rights have such a large negative impact on everyone down canyon? This is why adherence to RCW 36.70A.110 matters. The Washington State Legislature enacted this law because "*uncoordinated and unplanned growth posed a threat to the environment, sustainable economic development and quality of life in Washington.*" The law says that counties "*shall designate an urban growth area or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature.*" Tamarack Saddle's village was not designated as an urban growth area by Chelan County but, with a bed base larger than the city of Cashmere, it is definitely urban in nature. It's not just a violation of the law itself but a case study for the problems that arise when urban-type growth is not carefully managed.

The developer hopes to squeeze through a loophole in the GMA allowing Master Planned Resorts (MPR) outside of the urban growth area. However, this development meets neither the intent nor character of an MPR and its designation as such is probably illegal. The development is not self-contained, does not consist of short-term visitor accommodations, and does not preserve the rural character of the upper Stemilt and Squilchuck basins or the rural nature of the lower Squilchuck valley between the ski area and Wenatchee. All of this is necessary for the development to qualify as

an MPR.

Connected to the problems arising from poorly managed growth is what will happen to Wenatchee itself once Tamarack Saddle begins an aggressive marketing campaign for its mountain village. Many West Side skiers fed up with the chaos of skiing Crystal Mountain, Snoqualmie Pass, and Stevens Pass will come looking into a second residence to enjoy skiing that's only 2.5 hours away. And once they come looking many will decide to purchase in Wenatchee itself rather than in the village. This will steadily escalate the cost of housing and property taxes within the city of Wenatchee, escalating the housing problems and gentrification issues the city is already experiencing.

In conclusion I will state the obvious: It's a terrible solution that purports to fix one problem (the ski area's long-term viability) but creates ten equally serious problems (increased hazard of fire creation, decreased fire protection and fire safety, battles over water rights, increased issues like traffic for pre-existing down-valley residents, over-use of surrounding public lands, violation of codes, violation of the Stemilt Partnership's, and degradation of the community fabric).

A solution that spawns a host of legal, environmental, and social problems needs to be rethought. There are other solutions to Tamarack Saddle's claims that the development is needed for the ski area to survive. Around the country, there are some 20-nonprofit ski hills run as community hills. Three examples are Bogus Basin (above Boise), Bridger Bowl (above Bozeman), and Mt. Spokane (above Spokane). All three of these operate as community hills rather than destination resorts, have equal or better infrastructure to Mission Ridge, are of similar size or larger, and cost 10 to 17 percent less to ski. And they are all surviving financially. If the owner is not making a suitable return on his investment and no longer wishes to run a community hill, one serious solution we should explore is turning this community asset over to community control.

Rather than starting a chain reaction of bad outcomes, say 'no' to this problematic proposal by enforcing all the codes the Proposed Expansion violates. Let the owner and/or the community rethink the single issue of how to make the finances of our hometown hill work while it continues operating as a hometown hill. We have a robust local ski community, and as a community working together, we can find a far better solution than the one Tamarack Saddle has spent several years 'selling' us.

Andy Dappen
2332 Westview Drive
Wenatchee, Washington 98801

P.S. Please send notice that this message was received and will be added to the public record.

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Cc: [Bob Bugert](#)
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Particularly during the hottest, driest months of the fire season, the safety of village residents and visitors are endangered if the County does not follow its own codes by insisting that there be two separate means of entering and exiting the development. Failure to have secondary access not only threatens the lives of villagers during an emerging large wildfire, it all but ensures that regional and federal firefighting resources will not be sent to the village to protect property. This is because agencies will not endanger the lives of their firefighters by sending them into the fire trap this development presents. Approving the project as it stands now makes the County complicit in endangering people's lives and exposing those people to great financial loss. Someday major wildfire will sweep through this development just as wildfires have done in faraway places like Colorado, California, and Alberta, and just as wildfires have done in nearby places like Pateros and Wenatchee itself.

The fire protection plan for Tamarack Saddle's Project Application argues that section 104.8 of the International Fire Code (IFC) allows the fire code official to grant modifications for individual cases when the code is impractical. The noted section of the IFC very clearly states that modifications are allowed only when they do not threaten life and fire safety requirements. Clearly there is a threat to life and fire safety if a growing summer wildfire engulfs the one road (an entirely realistic scenario) and leaves the occupants of a development with 4,000 beds with absolutely no means of escape and no safe way for other resources to help.

Not only could the wildfire losses to this development be immense, but those losses could put the county on trial, morally and maybe even legally, if the codes are ignored when the region's own recent history, when nationally known fire experts, and when its own citizens have given the county fair warning that the project's measures for contending with wildfire are grossly inadequate.

I made this point in the first letter and have researched it slightly, and I believe it's a point the

County's legal counsel should not take lightly. If the project is approved with only one road in and out, and if a wildfire catastrophe causes loss of life and great financial loss of property, could the county be held liable and financially responsible for negligence in violating its own codes? Some lawyers I've interviewed say the county would be given governmental immunity. Other lawyers have not been so confident that the county would escape being sued. In a number of cases the Washington State Supreme Court have swept away the protection of governmental immunity when a county's disregard of codes have resulted in catastrophic loss to the public it was entrusted to protect.

I urge you not to put our county in any such a position by strictly adhering to all codes meant to protect the public as they apply to this development. Chelan County should review the proposal with a leaning toward safety and full compliance with code, rather than demonstrate a willingness to make exceptions that benefit the developer but put the community and county itself at risk.

Another major issue with the proposed development, which applies tangentially to fire, is water. Different Squilchuck irrigation districts report the summer water in the entire drainage is already maxed-out and that during low-water years the pre-existing water rights of residents and farmers in the Squilchuck Valley are already not being met. This project claims to draw its water from deep aquifers but those familiar with the hydrology of the drainage know that the shallow and the deep water are connected, and that drawing from deeper water steals from the shallow water. In summer as the development draws water for domestic use and for its fire-protection needs, it will take water from those with pre-existing rights and a tangle of legal issues the county contributed toward will ensue. Before approving this plan, insist that the developer produce a study from a non-partial firm (and one approved by the different irrigation districts), that proves this development will not impact the water rights of everyone downstream (which is virtually everyone else in the Squilchuck drainage).

Between 2018 and now my concerns with the proposed village have grown well beyond fire (and water). I'm concerned about how the development will impact the migration, calving, and mating of the Colockum elk herd, an issue I suspect the Wenatchee Sportsmen will address with more authority, but a resource many of us don't want negatively impacted by the resort's spring, summer, and fall use. I'm concerned how the development violates the fundamental principles behind the formation of the Stemilt Partnership, which was formed to keep future development from damaging the water, wildlife, and recreation of the upper Stemilt Basin – all of those elements will be greatly impacted by all the people this development brings to live and play in the woods.

I'm concerned about the impact on traffic – use of the Squilchuck Road, the proposal's own study shows, will grow five to six fold. Is it right that one developer's property rights have such a large negative impact on everyone down canyon? This is why adherence to RCW 36.70A.110 matters. The Washington State Legislature enacted this law because "*uncoordinated and unplanned growth posed a threat to the environment, sustainable economic development and quality of life in Washington.*" The law says that counties "*shall designate an urban growth area or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature.*" Tamarack Saddle's village was not designated as an urban growth area by Chelan County but, with a bed base larger than the city of Cashmere, it is definitely urban in nature. It's not just a violation of the law itself but a case study for the problems that arise when urban-type growth is not carefully managed.

The developer hopes to squeeze through a loophole in the GMA allowing Master Planned Resorts (MPR) outside of the urban growth area. However, this development meets neither the intent nor character of an MPR and its designation as such is probably illegal. The development is not self-contained, does not consist of short-term visitor accommodations, and does not preserve the rural character of the upper Stemilt and Squilchuck basins or the rural nature of the lower Squilchuck valley between the ski area and Wenatchee. All of this is necessary for the development to qualify as

an MPR.

Connected to the problems arising from poorly managed growth is what will happen to Wenatchee itself once Tamarack Saddle begins an aggressive marketing campaign for its mountain village. Many West Side skiers fed up with the chaos of skiing Crystal Mountain, Snoqualmie Pass, and Stevens Pass will come looking into a second residence to enjoy skiing that's only 2.5 hours away. And once they come looking many will decide to purchase in Wenatchee itself rather than in the village. This will steadily escalate the cost of housing and property taxes within the city of Wenatchee, escalating the housing problems and gentrification issues the city is already experiencing.

In conclusion I will state the obvious: It's a terrible solution that purports to fix one problem (the ski area's long-term viability) but creates ten equally serious problems (increased hazard of fire creation, decreased fire protection and fire safety, battles over water rights, increased issues like traffic for pre-existing down-valley residents, over-use of surrounding public lands, violation of codes, violation of the Stemilt Partnership's, and degradation of the community fabric).

A solution that spawns a host of legal, environmental, and social problems needs to be rethought. There are other solutions to Tamarack Saddle's claims that the development is needed for the ski area to survive. Around the country, there are some 20-nonprofit ski hills run as community hills. Three examples are Bogus Basin (above Boise), Bridger Bowl (above Bozeman), and Mt. Spokane (above Spokane). All three of these operate as community hills rather than destination resorts, have equal or better infrastructure to Mission Ridge, are of similar size or larger, and cost 10 to 17 percent less to ski. And they are all surviving financially. If the owner is not making a suitable return on his investment and no longer wishes to run a community hill, one serious solution we should explore is turning this community asset over to community control.

Rather than starting a chain reaction of bad outcomes, say 'no' to this problematic proposal by enforcing all the codes the Proposed Expansion violates. Let the owner and/or the community rethink the single issue of how to make the finances of our hometown hill work while it continues operating as a hometown hill. We have a robust local ski community, and as a community working together, we can find a far better solution than the one Tamarack Saddle has spent several years 'selling' us.

Andy Dappen
2332 Westview Drive
Wenatchee, Washington 98801

P.S. Please send notice that this message was received and will be added to the public record.

From: [Peggy Cahill](#)
To: [RJ Lott](#)
Cc: jim.brown@dfw.wa.gov; [Kevin Overbay](#); Gwen.Clear@ecy.wa.gov; wyatt.leighton@dnr.wa.gov; [Claudia M. Newman Henry](#); [Audrey Cluncheon](#)
Subject: Comments on Mission Ridge Ski Area's Amended Application for a Master Planned Resort Overlay District, Development Agreement, and SEPA Review
Date: Monday, March 30, 2020 12:40:41 PM
Attachments: [image001.png](#)
[2020 03 30 Newman to Lott - Comment Letter.pdf](#)
[2020 02 21 Newman and Cluncheon to Kaputa - Scoping Comments.pdf](#)

External Email Warning! This email originated from outside of Chelan County.

Dear Planning Manager Lott:

Attached please find a letter from Claudia Newman to you (and an attachment) regarding the above-referenced matter.

Thank you for your attention to this matter.



Peggy S. Cahill
Legal Assistant
Bricklin & Newman, LLP
1424 Fourth Avenue
Suite 500
Seattle WA 98101

ph.: 206.264.8600
fax: 206.264.9300

Spokane Office:
25 West Main
Suite 234
Spokane, WA 99201

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From: [Mike Rolfs PE](#)
To: [RJ Lott](#)
Cc: [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#); [Mike Kaputa](#)
Subject: Comments regarding the Mission Ridge 2020 Project Application
Date: Tuesday, March 24, 2020 12:46:58 PM
Attachments: [2020 Chelan County Comment Letter - MRR 2020-03-23.pdf](#)
[2018 Chelan County Comment Letter - MRR 2018-10-19.pdf](#)

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Attached are my comments regarding the Mission Ridge 2020 Project Application. Also attached is the comment letter I submitted regarding the 2018 Mission Ridge Project Application. Those comments are still valid. Please respond to confirm that my comments have been received and recorded into the project record.

Thank you,
Mike Rolfs

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MAR 27 2020

1221 Madison Street
Wenatchee, WA 98801
March 25, 2020

CHELAN COUNTY
COMMUNITY DEVELOPMENT

R.J. Lott, Planning Manager
Community Development Department
316 Washington Street, Suite 301
Wenatchee, WA 98801

Dear Mr. Lott,

Thank you for allowing me to comment on the very important proposed Mission Ridge expansion which would take place on sections 19 and 30 near the current Mission Ridge Ski and Snowboard Resort.

Let me first say, I am not opposed to development on these private parcels. What however is remarkable, is that such an extensive development in this area would even be considered by any conscientious planning agency. The development, as proposed, would place a city with the population of Chelan - a city with a population larger than Cashmere, and nearly twice that of Leavenworth - in the middle of what is now defacto wilderness!

No doubt, due to the massive marketing campaign accomplished by the current owner of the land, you will receive numerous comments from the public in support of the Mission Ridge "expansion." This reminds me very much of the campaign by both Wenatchee and East Wenatchee Chambers of Commerce, all the government agencies, and most of the public in the 1980s concerning the riverfront highway. Those of us who opposed that highway were hated by every government agency, and by most of the public. However, what we have today instead of that riverfront highway, is a regionally renowned recreational loop trail, and a riverfront ultimately better in all respects. I have been proven correct in my assessment then, and I am certain that my assessment of the current Mission Ridge expansion proposal is correct today.

What we are facing now as a proposed development in the Squilchuck basin on sections 19 and 30, is not dissimilar from the situation we faced in the 1980s on the riverfront. The proposal for this development as submitted to Chelan County is unacceptable from an environmental standpoint. It is unacceptable from a public safety standpoint. It is unacceptable from a back country recreation standpoint. It is unacceptable from a "front country" recreational standpoint. It is unacceptable from the standpoint of: "What should the Squilchuck Basin and the Stemilt Basin look like twenty years from now?"

It also irks me that the development is presented to Chelan County and to the public as a way to expand and improve and enhance the Mission Ridge Ski and Snowboard Resort. In fact this is not so. Rather, this is a proposal that would enrich the developer, but it would not improve Mission Ridge skiing.

After reviewing the proposal, I have the following concerns:

First, I have fire risk concerns. This is a dry, forested area. Fire will occur from time to time. Human lives will be lost if the development is allowed as proposed. The proposed development of course would increase fire frequency. Not only is the developer proposing to place too large of a development in a high fire risk area, but he is proposing to skirt the usual requirement of at least TWO routes of ingress and egress. This flies in the face of the facts of fire risk in today's world.

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Second, I have concerns about loss of back country recreational opportunities. Chelan County is an important part of the Stemilt Partnership. The Stemilt Partnership, over many years, has worked through, among many other issues, the need for non-motorized recreation opportunities in the area. Through much negotiation, it was determined that the Stemilt Basin would be set aside for non-motorized activities such as back country skiing and snowshoeing. **The Stemilt Basin has some of the most wonderful back country skiing in all of Chelan County!** With the current Mission Ridge development proposal, a city with twice the population of Leavenworth would be placed immediately adjacent to this wilderness recreational area. A small city cannot be placed adjacent to a wilderness without dramatically changing the recreational opportunities in that wilderness. This issue is not addressed anywhere in the proposal. At the very least, adequate parking for access to the Stemilt Basin needs to be addressed in the proposal, and it is not.

In addition, other areas used by back country skiers, snowshoers and hikers would become busier. Parking at the Clara Lake trailhead is already insufficient for current use. I see no plan in the current proposal to expand parking there.

Third, I have concerns regarding wildlife habitat: I know that in the past, the large elk herd in the area has been an important consideration. The development proposal does not address impact on that elk herd. I am certain that The Rocky Mountain Elk Foundation will have scientific data on this issue, and I would defer to their expertise. Obviously with the large human population proposed as well as the impact of the nearly 10,000 trip per day road into and out of the area, impact on countless other species needs to be more appropriately addressed.

Fourth, I have concerns regarding the impact on the skiing experience at Mission Ridge: The proposed development would, of course, markedly increase the numbers of skiers and snowboarders on any given day at the resort. Yet almost no increased ski terrain is proposed. The small amount of increased ski terrain proposed is nearly entirely beginner terrain. Therefore, for the local skier/snowboarder at the resort, this simply translates to a more crowded ski experience; and on powder days, the place would be "skied out" in minutes.

Fifth, I have concerns about other recreational opportunities: Along with a development the size proposed (or even if it were substantially smaller) there needs to be much more attention to recreation. Hiking/snowshoe trails need to be planned. Mountain bike trails need to be planned. I see that there is a pitifully small Nordic ski trail planned, which instead should be at least twenty kilometers long. And more importantly, there needs to be adequate parking planned for each of these. None of these important recreational assets are appropriately planned for in the proposal as it is today.

Sixth, I have concerns about water: We know that this is an extremely dry area. We know that the water in the area is already spoken for by the farmers in the area and downstream. According to The Squilchuck-Miller Water Users' Association, water use has had to be cut during 18 of the last 25 years. The amount of water use expected in the planned development would be ninety acre feet just for domestic use. This would, of course, dramatically lower the water table, and further cut water available downstream. How does the County propose to solve this water shortage issue? I would think that before any permit could be issued, the water shortage would have to be scientifically addressed. This is not addressed at all in the current plan as submitted to the county as far as I can see.

In summary, the so called Mission Ridge Expansion proposal, as it has been most recently submitted to Chelan County, is woefully inadequate, and in several ways inappropriate for the above reasons. I am sure you will receive numerous support letters from good local citizens who believe, as I do, that Mission Ridge is "our wonderful local ski area and it must be supported." However, the proposed development on sections 19 and 30 as it currently is presented to the County, is not what most of those folks think it is! I too support Mission ridge. I've already bought a season pass there for next season! **But, the so called Mission Ridge Expansion project, as most recently submitted, does not deserve the support of the public, and it certainly does not deserve the acceptance of the Chelan County Community Development Department.**

Respectfully,

Mark W. Shipman

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MAY 27 2009

CHELAN COUNTY
COMMUNITY DEVELOPMENT

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MAR 27 2020

1221 Madison Street
Wenatchee, WA 98801
March 25, 2020

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MAY 27 2009

CHELAN COUNTY
COMMUNITY DEVELOPMENT

Stuart Smith
3096 Tamarack Pl
Wenatchee, WA 98801

RECEIVED

MAR 27 2020

R. J. Lott
Planning Manager
Chelan County Department of Community Development

CHELAN COUNTY
COMMUNITY DEVELOPMENT

March 25, 2020

Dear R. J.,

Thank you for the opportunity to comment on the proposed expansion at the Mission Ridge ski area. I am in opposition to the proposal for the following reasons:

Most importantly, this proposal is nothing more than a thinly-veiled disguise to market (and subsequently churn) real estate. It has everything to do with profiting from real estate transactions, and little to do with skiing, and I resent that it is being sold to the community as a skiing "enhancement". Rather than improving the skiing experience, it will place an undue burden on the local services and infrastructure to accommodate and clean up after this development.

In addition to the profiteering aspect of the development, I am opposed to more people (a potentially Cashmere-sized population!) living high up Squilchuck canyon for the following reasons:

1. The only access is via a narrow, twisting, one-way county road. During the inevitable wildland fire, the additional panicked traffic down that road will create conditions that contribute to a deadly human disaster.
2. Speaking of wildland fire, thousands of vacationers (many of whom with no understanding about living in a fire-prone environment) staying at the development during the dry summer will only exacerbate the risk of human-caused fire in the area.
3. The proposed road between the existing ski area parking lot and the proposed housing area has serious engineering and environmental concerns.
4. A development of this magnitude will draw considerable water for human and commercial use, negatively impacting in-stream flow for fish and other downstream species.
5. Proper sewage disposal will be impossible with a development of this size. The future public will be left to clean up the increased bacterial and turbidity load in Squilchuck Creek.
6. Local authorities will be hard-pressed to pay for and accommodate this remotely-located community regarding fire, police, first responders, planning, inspections, and the myriad of other legally-required governmental actions and oversight. Here's but one, of many, examples: How will the county road department, with an already-stretched budget, handle the more frequent maintenance and repair requirements on Squilchuck road and its many bridges from the increased traffic?

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Wenatchee, WA 98801

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From: [Chester](#)
To: [RJ Lott](#)
Subject: Fwd: Mission Ridge Expansion Proposal
Date: Tuesday, March 10, 2020 2:26:29 PM

External Email Warning! This email originated from outside of Chelan County.

Subject:Mission Ridge Expansion Proposal

Date:Tue, 10 Mar 2020 13:15:03 -0700

From:Chester <northfork@nwi.net>

To:rj.lott@co.chelan.wa.us

Comments on Mission Ridge Expansion Proposal:

I support the Mission Ridge Proposal in concept, with several specific remarks described below. The Okanogan-Wenatchee National Forest Draft EA substantially justifies the project in its Purpose and Need section, and will not be duplicated here. However, the USFS Purpose and Need narrative supports the project in concept only, and does not refer to the specific scale of the final village build-out described in the Mission Ridge Resort Development Application sent to Chelan County (the project narrative). The 900-plus accommodation units is a large development, approaching the population (pillow count) of a small town. As a matter of comparison, the 1980s Constellation Ridge Resort proposal called for significantly less housing units, although greater ski terrain. It is interesting to note that the Constellation EIS mentioned the proponent's desire to utilize PUD water for their domestic water needs. Given the scale of the present Mission Ridge proposal, the use of PUD water would alleviate concerns over stressing the water capacity from the use of wells drilled within the boundary of the Squilchuck watershed. This watershed is already taxed, and it would seem risky to jeopardize it with a major water withdrawal for the proposed village. I assume water districts in the Squilchuck will strongly oppose such withdrawal. PUD water offers a guaranteed supply. Assuming the project will have the positive economic impact for the county that are projected, PUD involvement could be justified. Further, the scale of the resort (# of overnight units) should be examined closely by Chelan County; Is the 900-plus capacity the minimum needed for financial viability, or would a more modest total create a successful project with less impact on Squilchuck Road traffic, and soften other environmental issues? Other aspects of the village--beginner terrain, snow-play, additional parking, nordic trails, lift access, etc.--are vital and will doubtless further support the viability of Mission Ridge.

Respectfully,

Chester Marler--retired administrative staff, Stevens Pass ski Resort

Leavenworth, WA

From: [Chester](#)
To: [RJ Lott](#)
Subject: Fwd: Mission Ridge Expansion Proposal
Date: Tuesday, March 10, 2020 2:26:29 PM

External Email Warning! This email originated from outside of Chelan County.

Subject:Mission Ridge Expansion Proposal

Date:Tue, 10 Mar 2020 13:15:03 -0700

From:Chester <northfork@nwi.net>

To:rj.lott@co.chelan.wa.us

Comments on Mission Ridge Expansion Proposal:

I support the Mission Ridge Proposal in concept, with several specific remarks described below. The Okanogan-Wenatchee National Forest Draft EA substantially justifies the project in its Purpose and Need section, and will not be duplicated here. However, the USFS Purpose and Need narrative supports the project in concept only, and does not refer to the specific scale of the final village build-out described in the Mission Ridge Resort Development Application sent to Chelan County (the project narrative). The 900-plus accommodation units is a large development, approaching the population (pillow count) of a small town. As a matter of comparison, the 1980s Constellation Ridge Resort proposal called for significantly less housing units, although greater ski terrain. It is interesting to note that the Constellation EIS mentioned the proponent's desire to utilize PUD water for their domestic water needs. Given the scale of the present Mission Ridge proposal, the use of PUD water would alleviate concerns over stressing the water capacity from the use of wells drilled within the boundary of the Squilchuck watershed. This watershed is already taxed, and it would seem risky to jeopardize it with a major water withdrawal for the proposed village. I assume water districts in the Squilchuck will strongly oppose such withdrawal. PUD water offers a guaranteed supply. Assuming the project will have the positive economic impact for the county that are projected, PUD involvement could be justified. Further, the scale of the resort (# of overnight units) should be examined closely by Chelan County; Is the 900-plus capacity the minimum needed for financial viability, or would a more modest total create a successful project with less impact on Squilchuck Road traffic, and soften other environmental issues? Other aspects of the village--beginner terrain, snow-play, additional parking, nordic trails, lift access, etc.--are vital and will doubtless further support the viability of Mission Ridge.

Respectfully,

Chester Marler--retired administrative staff, Stevens Pass ski Resort

Leavenworth, WA

From: [Shannon Claeson](#)
To: [RJ Lott](#)
Subject: Mission Ridge development application
Date: Thursday, March 12, 2020 9:43:29 AM
Attachments: [Chelan Co_Mission Ridge comment letter.docx](#)

External Email Warning! This email originated from outside of Chelan County.

RJ Lott,
Please see the attached comment letter to Mission Ridge - Notice of Amended Application (file # MPR 2018-128).
Thank you, Shannon Claeson

From: [Shannon Claeson](#)
To: [RJ Lott](#)
Subject: Mission Ridge development application
Date: Thursday, March 12, 2020 9:43:29 AM
Attachments: [Chelan Co_Mission Ridge comment letter.docx](#)

External Email Warning! This email originated from outside of Chelan County.

RJ Lott,
Please see the attached comment letter to Mission Ridge - Notice of Amended Application (file # MPR 2018-128).
Thank you, Shannon Claeson

From: [Cody Gillin](#)
To: [RJ Lott](#)
Subject: Mission Ridge Expansion Master Planned Resort comment
Date: Thursday, March 26, 2020 11:03:17 PM

External Email Warning! This email originated from outside of Chelan County.

Dear Mr. Lott,

Thank you for the opportunity comment on the proposed Mission Ridge expansion. I understand Chelan County Community Development takes seriously its responsibility to review proposed developments and consider the perspectives/findings of interested members of the public. After reviewing the proposal narrative, appendices, and other pertinent documents, I identified deficiencies in the proposal documents as well as misalignment between proposal information pertaining to growth and resource management in Chelan County and Washington State. Here is a summary of my review and conclusions:

1. Affordable Housing: The expansion proposal forecasts no problems with resort employees securing affordable housing either in dedicated workforce housing at the new village complex or elsewhere in the Wenatchee Valley. This runs contradictory to the Our Valley Our Future initiative's recent report on affordable housing in the Wenatchee Valley and surrounding areas. The OVOF housing report identified a direct link between a lack of affordable housing with an inability of major employers to fill vacancies as well as families double-occupying dwelling units. The report goes on to list many factors that contribute to a growing lack of affordable housing, all of which are out of the purview of the expansion proposal. In communities with large ski resorts and live-in villages, the gap in housing affordability is actually wider than other nearby locations (this is a well-documented problem that results from the housing stocks being converted to vacation homes and short-term rentals that either sit vacant most of the year or are unavailable for a low-wage workforce that operates and maintain a ski area, village, and on-site services). The expansion proposal housing report appears to not have considered any of the information or documentation on this problem. Since Chelan County is a sponsor and board member of the OVOF initiative, it should ensure that new developments in the region align with the recommendations emerging from the OVOF process, including making strides to improve (not exacerbate the existing deficiency of) affordable housing.
2. Wildfire, Fire-Flow, and Ingress-Egress: The proposed expansion would place hundreds of structures and thousands of people into a high-risk wildfire area where fire is a healthy, necessary component of a functioning ecosystem. As presently proposed, the expansion is requesting downward modifications to existing Chelan County code for fire flow/fire protection (15.40.040). Ingress and egress would be available on only a single road constructed on a steep slope with the village located upslope. A community with a population the size of Cashmere situated upslope of a sure-to-burn-forest with only one way out and inadequate fire flow protection poses grave threat to public safety. No municipal water supply is presently available to support fireflows.
3. Water Availability: At present, winter and summer streamflows in Squilchuck Creek are allocated and during low-flow periods are overallocated. The Stemilt-Squilchuck Watershed Plan identifies several reasons to be extremely cautious with the proposed new development, and only one indecisive result which could support new development in that "a portion of winter and spring runoff, return flow from irrigation and base flow may be available for diversion to new or additional storage" (there is no irrigation return flow that high in the basin so all water needed for the expansion would come from base flow). The proposed expansion appears to require an undefined rate/quantity of additional water for domestic and snowmaking purposes that would be supplied by drilling deep wells into the

upper Squilchuck Basin aquifer. The Hydrology Memo is vague and hesitant in its conclusions that “the availability of future water needs *may* be present in deep bedrock fractures in the vicinity of the proposed Mission Ridge Expansion project” and “the *potential* availability of groundwater for domestic and snow making uses *may* be available from deep bedrock fractures at the site”. The Hydrology Memo indicates that the deep bedrock fractures where drilling is recommended “appear to be in hydraulic continuity with the surface waters near the ski area where current water right diversions are being utilized”. If surface water flows are at best fully allocated (as indicated in the Stemilt-Squilchuck Watershed Plan) and the proposed groundwater supply is in connectivity with surface water then new withdrawals from the aquifer could steal water from existing water right holders. No municipal water supply is presently available to support domestic and/or snowmaking purposes.

4. Urban Growth and Community Vision: RCW 36.70A.110 requires counties to “designate an urban growth area or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature.” The proposed expansion adds 4000 pillows (analogous to the population of Cashmere), which is urban growth in nature and seems to be in violation the intent of Washington urban growth law. Furthermore, the expansion proposal does not seem to align with the Stemilt-Squilchuck Community Vision (in which Chelan County was a lead partner) which found that the upper Squilchuck Basin cannot support urban-level development (an expansion to include hundreds of condominiums, restaurants, lodges, transportation, and other services to support 4000 overnight residents and many thousands more day users is unmistakably urban).

5. Community Cost-Benefit Comments/Observations: The proposed development, if realized, would offer some benefits to recreation and the economy. There could be new opportunities for hikers, mountain bikers, trail runners, and Nordic skiers. Additional terrain will be opened for downhill skiing. An expanded resort will provide jobs and visitors will patronize local businesses. But there also appears to be great risk of many deleterious, irreversible impacts. Water supplies will be compromised in an already thirsty region. Wildlife habitat will be reduced in an already fragmented area. Traffic is projected to increase over five-fold and greatly reduce the current level of service in the travel route. Wildfire risk will increase and pose threats to a community that is already struggling to cope with increased frequency, magnitude, and intensity of fire. Wildfire protection, as proposed, is lacking. The way of life for the rural Squilchuck community already pressured by development and increased recreation will be irreversibly altered. A greater strain will be placed on already deficient affordable housing. Areas presently used by backcountry recreation will be forever lost.

Again, thank you for the opportunity to comment on the Mission Ridge expansion proposal. I support local businesses and efforts aimed at improving recreation and tourism, but not when it comes at the expense of the resources, ways of life, and physical safety of the community, and not when proposed actions fail to align with planning efforts and community initiatives aimed at guiding sustainable development and wise stewardship of the region's natural resources. I do not support the proposal as presently submitted.

Best,

Cody Gillin

621 Lowe Street

Wenatchee WA 98801

From: [Cody Gillin](#)
To: [RJ Lott](#)
Subject: Mission Ridge Expansion Master Planned Resort comment
Date: Thursday, March 26, 2020 11:03:17 PM

External Email Warning! This email originated from outside of Chelan County.

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Again, thank you for the opportunity to comment on the Mission Ridge expansion proposal. I support local businesses and efforts aimed at improving recreation and tourism, but not when it comes at the expense of the resources, ways of life, and physical safety of the community, and not when proposed actions fail to align with planning efforts and community initiatives aimed at guiding sustainable development and wise stewardship of the region's natural resources. I do not support the proposal as presently submitted.

Best,

Cody Gillin

621 Lowe Street

Wenatchee WA 98801

From: [Gustav Bekker](#)
To: [RJ Lott](#); [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#); [Mike Kaputa](#)
Subject: Mission Ridge Expansion project
Date: Friday, March 27, 2020 1:11:11 PM
Attachments: [El Sendero WWA letter to Chelan County 2020-03-27.pdf](#)

External Email Warning! This email originated from outside of Chelan County.

Dear Mr. Lott,

We appreciate the opportunity to provide these public comments on the Mission Ridge Expansion Project in Chelan County, Washington.

Comment letter attached.

Gus Bekker
President
El Sendero Backcountry Ski and Snowshoe Club
PO Box 5622
Wenatchee, WA 98807

Hilary Eisen
Policy Director
Winter Wildlands Alliance
PO Box 631
Bozeman, MT 59771

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From: [Gustav Bekker](#)
To: [RJ Lott](#); [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#); [Mike Kaputa](#)
Subject: Mission Ridge Expansion project
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Comment letter attached.

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President
El Sendero Backcountry Ski and Snowshoe Club
PO Box 5622
Wenatchee, WA 98807

Hilary Eisen
Policy Director
Winter Wildlands Alliance
PO Box 631
Bozeman, MT 59771

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From: [Colleen Ryan](#)
To: [RJ Lott](#)
Subject: Mission Ridge Expansion
Date: Sunday, March 29, 2020 8:01:42 PM

External Email Warning! This email originated from outside of Chelan County.

Dear RJ Lott,

I am writing to oppose the proposed Mission Ridge expansion. There are several reasons I originally felt this was a flawed and one-sided proposal and the more I learn about it, the more strongly I feel that this is a very bad idea for more reasons than I originally realized. I hope the community's voice is heard as I speak for many in saying this proposal appears to benefit one person(s) and unfortunately negatively impacts the rest of us: our community and land.

Before discussing issues involving the environment, community/local economy, and the bending/breaking of rules and policies, I would like to share a personal viewpoint. In watching the video on YouTube titled "Mission Ridge Expansion" it is glaringly obvious that the opposite effect to what is suggested will take place. Let me explain. The message sent out is that we love our valley; Mission Ridge being one of our community gems. It is discussed in the video how Mission Ridge helps recruit (and dare I say retain) health care providers. I am a health care provider that moved here five years ago, partially for Mission Ridge, as it is; a small community ski hill with, to put it bluntly, mediocre snow fall and terrain that makes up for those shortcomings with a community vibe without overcrowding. With development of the proposed village, those perks would no longer exist. I enjoy using my Mission Ridge pass, accessing the trails and backcountry terrain year round and this expansion would change that forever. All the things that they are listing in the video as pros about living here would be deeply and negatively impacted by this expansion. In fact, it would have a negative impact on recruitment and retention of health care providers that prioritize positive outdoor experiences.

There are several environmental concerns that I am sure you are already aware of and should be taken seriously. Some of those concerns include the increase of fire risk with increased population and the potentially fatal dangers of residents and firefighters with the one road in and out. Also water is a major concern. It is brought to my attention that the aquifer does not have the water needed to support current water right holder demands year round, much less the proposed 4000 pillow community. Would Mission have to make more snow to get to and from the village on the proposed new chair lift(s)? The Stemilt Partnership's report included that the upper watershed cannot support urban-level development, yet there is a proposed village with as many beds as our neighboring town of Cashmere- how does this make sense? The concerns with the septic system is real; are drain fields really a viable option for this large of community? And if the water quality fails testing due to this, the local orchardists are the ones impacted if their fruit cannot be picked. There are also obvious concerns with local flora and fauna: including but not limited to the whitebark pine, the northern speed owl and the Colockum elk herd migration.

Thank you to the County for establishing and leading in the Stemilt Partnership. Please hold strong to the values and goals of that partnership. Also this plan violates Washington's

law on Urban Growth Areas.

This proposal would take away from the local economy in several ways. For example, my friends came to ski Mission three weeks ago. They stayed in a local hotel, shopped in local shops and ate in local restaurants. Never once was it mentioned that the mountain was too far to go to town for a meal, being an easy 20 minute drive. This proposal is not good for the local economy. If second home owners or overnight guests are staying and eating at the mountain, that money is not being spent in and around our local community. That money goes into the developer/owner's pocket. That someone is not a local.

Mission is a small ski hill with decent snow. This expansion does not add skiable terrain beyond some mentioned beginner level. It would make the current terrain crowded. This proposal negatively impacts our community gem of a ski hill, the environment, the local culture/economy and breaks policies and partnerships. Please listen to the community when we say: We DO NOT want this expansion.

Thank you for your time.

Sincerely,

Dr. Colleen Ryan

From: pqwilliams23@nwi.net
To: RJ.Lott@chelancounty.org
Subject: Mission Ridge expansion
Date: Tuesday, March 24, 2020 11:05:55 AM

External Email Warning! This email originated from outside of Chelan County.

Dear Mr. Lott,

I am writing to ask you to deny the approval of the current Mission Ridge Expansion Plan based on conditions around wildfire risk, uncertainty of water availability within the Squilchuck Basin, as well as violation of Urban Growth RCW 36.70A.110. Since the data presented by the developer is minimal at best, I urge Chelan County to seek consultation from a qualified, independent hydrologist and a wildland fire risk manager who can evaluate the technical reports submitted by the developer, and to determine future potential liabilities the development that will fall on the county to fund. Chelan County needs to incorporate climate-change forecasts for eastside Cascade Mountains the next 50 years, developed by the University of Washington and available through the Climate Impacts Group <https://cig.uw.edu/>.

The County should deny the request for exceptions contained in the fire protection plan. In fact, the fire marshal should increase fire-flow requirements for this high-risk development placed in a fuel-rich dry forest. The required fire flow is not impractical if the water supply comes from the PUD. However, the PUD has indicated in their October 18, 2018 Agency Comment letter on MPR 2018-128 that:

âEURoeIn summary, water service is considered not available at this time until determined permissible and feasible. Significant water system infrastructure will be required and the design, permitting, planning and construction of such infrastructure is a multiyear effort.âEUR

This suggests that municipal water will not be immediately available.

Until the water issue is resolved, the plan should not be approved.

Modification to international fire code 104.8 is allowed only when the modification does not lessen life and fire safety requirements. Having a 4,000-pillow community trapped by an engulfed access road during an emerging catastrophic fire is a grave threat to fire safety and to life.

The road, as currently planned, upslope of a 30% (+) sidehill is unsuitable as a stand alone egress route. The proposal should be reviewed with a life-safety bias for the public, not a financial bias benefiting a private developer and other businesses seeing opportunities within the project. To approve the single access layout of this project is irresponsible on the CountyâEUR(tm)s part.

Violation of Urban Growth Area RCW 36.70A.110 This RCW states that counties âEURoe....shall designate an urban growth area or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature. âEURoe The Mission Ridge area was not designated an Urban Growth Area by Chelan County. The Washington Legislature enacted this law because they âEURoefound that uncoordinated and unplanned growth posed a threat to the environment, sustainable economic development and quality of life in Washington.âEUR The Mission Ridge Development would add 4000 pillows making it a community the size of Cashmere. Clearly the development is in violation of this law and its intent.

In addition we are very concerned about the effects that this development will have on traffic, wildlife, overcrowding and overuse of natural resources. We ask that the developer resubmit a plan that is within the RCWâEUR(tm)s, Fire Codes, and be less destructive to the environment and quality of recreational opportunities.

Thank you for the opportunity to comment.

Sincerely,

Include your name and address

Patricia L. Quinn-Williams

2448 N. Ashland

East Wenatchee, Wa 98802

From: [Squilchuck Miller Water Users](#)
To: [RJ Lott](#)
Cc: [Mike Kaputa](#); mark.schuppe@ecy.wa.gov; [Gordon Zimmerman](#); [Norm Gutzwiler](#); [Terry Fitzpatrick](#); [Tony Eastman](#)
Subject: Mission Ridge Expansion
Date: Monday, March 23, 2020 12:12:33 PM
Attachments: [MRF-County Letter.pdf](#)

External Email Warning! This email originated from outside of Chelan County.

Hello,

Please find attached our comments regarding the Mission Ridge Expansion.

Please confirm receipt,

Thank You,

Tanya Reece

Beehive Squilchuck Miller Water Users
4593 Squilchuck Rd
Wenatchee, WA 98801
(509)662-6675
beewater@nwi.net

From: [Paul Ballinger](#)
To: [RJ Lott](#)
Subject: Mission Ridge Expansion
Date: Friday, March 27, 2020 1:58:03 PM

External Email Warning! This email originated from outside of Chelan County.

Paul Ballinger
2009 Skyline Drive
Wenatchee, WA. 98801
March 27, 2020

R. J. Lott, Planning Manager
Chelan County Community Development
316 Washington St. Ste 301
Wenatchee, WA. 98801

Dear Mr. Lott,

I am writing to present arguments against the approval of the Mission Ridge Expansion Plan, based on conditions around wildfire risk and lack of water availability within the Squilchuck Basin. At a minimum, I urge Chelan County to seek consultation from a hydrologist and a wildland fire risk manager who can evaluate the technical reports submitted by the developer, and to determine future potential liabilities the development that will fall on the county to fund. Chelan County needs to incorporate climate-change forecasts for eastside Cascade Mountains the next 50 years, developed by the University of Washington and available through the Climate Impacts Group <https://cig.uw.edu/>

ISSUES AROUND WILDFIRE RISK: I am using text prepared by the AEGIS Engineering, PLLC for the client and written in the Fire Protection Plan (April 18, 2018; revised Dec. 7, 2019):

AEGIS Engineering describes this as a location is not suitable for urban development.
Page 5: *Fire Hazards: The Isolated location of the Mission Ridge site present inherent challenges with regard to access for emergency responders in event of an emergency. The topography around the subject development area ranges from about 25%-100% slopes, contributing to the extreme conditions present at the site. A compounding factor is the extreme seasonal climatic conditions, which contribute to snow accumulation during the winter months and potential wildfires in the summer. Primary fire hazards contemplated involve structures and vehicles within the development, as well as wildland fires approaching from outside the site.*

AEGIS Engineering completed the International Wildland-urban Interface Code Fire Hazard

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

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

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

ISSUES AROUND WATER AVAILABILITY: The next argument against the approval of the Mission Ridge Expansion Plan, focuses on the inadequacies of the current understanding of the Squilchuck Basin’s Hydrology. The text prepared by WNR Group for the client supports my claims. Below are excerpts from the Hydrology Memorandums (March 26, 2018 Hydrology Review Memorandum; and the Memorandum of Dec. 31, 2019).

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

of future water needs may be present in deep bedrock fractures in the vicinity of the proposed Mission Ridge.

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

The WNR Group does not take into account that homeowners will be year-round users of their properties, with high residential water use year-round. Chelan County is experiencing growth and home purchases by Seattle area residents who move to our region for more affordable housing. Wenatchee and the Pacific Northwest are where climate refugees are moving and the current wave of retirees are the tip of the iceberg.

(Source: Ciff Mass Weather Blog <https://cliffmass.blogspot.com/2014/07/will-pacific-northwest-be-climate.html>

This incoming population will be the primary purchasers of residences in the development. WNR Group falsely assumes peak residence occupancy will only be during ski season, as it states, *“Availability of water is typically found during winter and spring seasons. If the proposed development occurs, the majority of use will occur during these seasons when water is available. Potable groundwater for in house use at the site will be in highest demand during the winter months, not during the low flow time period of the hydrologic cycle.”* This has no evidence, just a hope and a prayer.

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

The WNR Group does not address the forecasted climate change for east-side Cascades, shifting precipitation to rain (instead of snow), resulting in surface run-off highest in late fall through winter. WNR Group asserts that *The development of a snow pack on the ski slopes near the development is a non-consumptive use, and will also effectively help stream flows during the spring and summer months by allowing more recharge to the surface waters during the spring melt.*

Thank you for facilitating this important public process.

Sincerely,
Paul Ballilnger, MD
Resident of Chelan County since 1993

From: crader@nwi.net
To: RJ.Lott@chelancounty.org
Cc: Kevin.Overbay@chelancounty.org; Bob.Bugert@chelancounty.org; Doug.England@chelancounty.org
Subject: Mission Ridge proposal
Date: Friday, March 27, 2020 11:23:15 AM

External Email Warning! This email originated from outside of Chelan County.

I am against the proposed Mission Ridge development project in its current form. I do want to see the ski area expanded – more skiable terrain, maybe a small area for overnight housing and a related business or two – but this proposal is too big. I think it puts too much pressure on the aquifer and on wildlife (especially elk) living in this area. With only one way in and out, the development would just put more people in danger if there should ever be a wildfire there. The project would consume much land and bring too many people to a site that now provides quiet, non-motorized, year-round recreational opportunities. Please do not approve this project.

Thank you,
Christine Rader
1700 Rainier Street, Wenatchee
509-888-0181

From: [Carin Smith](#)
To: [RJ Lott](#); [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#); comments-pacificnorthwest-wenatchee-wrrd@fs.fed.us
Subject: Mission Ridge proposed expansion comments
Date: Wednesday, March 25, 2020 11:53:27 AM

External Email Warning! This email originated from outside of Chelan County.

With regard to the proposed development at Mission Ridge:

I am an avid skier and support the current state of the Mission Ridge Ski Area as a great recreation resource for our valley. However, I have deep concerns about the proposed development.

1. Access and fire danger. Please study what happened in the wildfire in Paradise, California. See the Los Angeles Times article : "Must Reads: Here's how Paradise ignored warnings and became a deathtrap" It states, "It was doomed by ... dead-end roads that paid no heed to escape." What plans does the developer have to create additional access? With Squilchuck road being the only access, think about how our community will respond after something like this happens here. How will hearing "I told you so" will help those who lose their homes or even die? Yes, this development has fewer homes than did Paradise. How many are you willing to risk? The development plan only addresses fire mitigation (eg thinning, fireproof materials), but nothing about fire evacuation.
 - a. See <https://www.latimes.com/local/california/la-me-camp-fire-deathtrap-20181230-story.html>
2. Water. Please talk with independent experts about the water table, amounts of water potentially available, impact on the aquifer, and water needs both for homes and fire fighting. Do not rely on the developer's information. It appears that the watershed cannot support the additional housing. See the details in number 4 on this page: https://docs.google.com/document/d/e/2PACX-1vQ09NMHTko1aalJmwEEoVah-xCJBhsjFhlOaG2Mr8Nm9jNA1haxD4oPbfiQai_mQW3Sb0R3iF448zW/pub#h.87gigvo0rf5v
3. Traffic. Where will the traffic go after it hits the three intersections that are discussed in the proposal? It will not just disappear. What about the Sellar bridge? Wenatchee Avenue? Also, the proposal states that since the full development won't happen until 2040, that the traffic impacts be "re-evaluated at a future date." What then--if the impacts are deemed to be unacceptable, do they un-construct what is already built? Absurd.

In summary, although I am an avid skier and do want to support our local ski area, I strongly feel this is not the way to do so. Maybe we first need a road from the top of Mission Ridge down to Ellensburg? That could address the fire evacuation and traffic issues... but there is still the water.

Sincerely,

Carin Smith

From: [Ronald](#)
To: [RJ Lott](#)
Subject: Mission Ridge, MPR 2018-128
Date: Monday, March 16, 2020 12:24:35 PM
Attachments: [Mission Ridge Development - 2020.docx](#)

External Email Warning! This email originated from outside of Chelan County.

Attached are our comments about the proposed Mission Ridge expansion.

Thanks,
Ronald Balzer
509-886-3562

From: [Dean O'Daffer](#)
To: [RJ Lott](#)
Subject: MPR 2018-128
Date: Tuesday, March 10, 2020 5:49:56 PM

External Email Warning! This email originated from outside of Chelan County.

I am writing this letter as public comment in regards to the proposed Mission Ridge Resort Development Expansion. I say Expansion as a loose term because the proposed resort is many times larger than the present resort. Now there is a Lodge and a few other buildings, there will be 900 + buildings. This expansion seems way out of proportion to the present situation. Is this reasonable? If you are an investor, maybe so, if you are a present county resident who uses this area or if you are part of the ecology of this area now, maybe not so.

This new Mega Vision for Mission Ridge is about building and selling Real Estate . This will be a problem for the surrounding natural areas. The Lake Clara and Stemilt Basin areas will be heavily used by recreationalists; hiking, biking, motorcycling, and 4 wheeling. The animals will be pushed out, the air quality diminished and the silences become naught, This Proposed village will eventually cause demand for more skiing terrain, putting more pressure on the surrounding natural areas

It is also ironic that the Resort will provide services to its residences, when Climate Change transitioning seeks to centralize services away from the suburbs. Wenatchee has all the services that visitors need. The proposed Clock Tower in the Plaza is taken directly from the Vail Colorado playbook, with its nearby businesses and condominiums. . Chelan County has Leavenworth and Chelan, both are heavily invested in the tourist industry. Are these cities going to have to compete with the Resort? More tourism may not be in the best interest for our Chelan County, why put all our eggs in one basket?

The hydrology reports seems a bit vague. Yes there are existing water rights, yes there is surface water and yes there is deep well water. But how much is needed and how much is available? How will this affect the Squilchuk growers and also how will it affect the Stemilt growers because the deep wells most likely will be drawing from water tables that are common to both drainages. Have these questions have been answered?

This entire area is prone to landslides and slumps. In the last few years, this geology weakness has been seen in the Ski area, Beehive road and the Heights area. Building a road through this steep and heavily forested terrain seems risky. If there is a Wildfire in this area, the slides will become more of a risk. When the road slides, who will be responsible for fixing it and for the trapped residents. Under no circumstances should Chelan County put itself in this position.

Just a short note on the employee housing. This housing will most likely not be for local residents, but will be for foreign workers. That is the model being used in some Colorado resort areas.

Dean O'Daffer

1509 3rd Street

Wenatchee, Wa.

From: [Erin Andrade](#)
To: [RJ Lott](#)
Subject: MR Expansion
Date: Sunday, March 29, 2020 6:27:56 PM
Attachments: [Erin Andrade MR Expansion Comments.docx](#)

External Email Warning! This email originated from outside of Chelan County.

RJ Lott,

I reviewed the El Sendero meeting summary, detailing some of the greatest concerns noted with the current proposed project.

I included, in red in the attached document, the things I most agree with, namely:

- *The concern of creating an overcrowded recreation area*
- *The significant negative impact on traffic*
 - o *Specifically, although there is more parking; there is not a new road built to accommodate the extra vehicles that would be getting to the new facilities*
 - o *The housing development is too large for the current infrastructure*
 - o *The impact on the local residents and users will be significant, creating a negative experience, similar to that at Stevens Pass or Snoqualmie Pass*
- *This proposal violates the Stemilt Partnership Mission, by potentially impacting our wildlife as well as our recreational experiences by having an urban development so close to that area*
- *I also agree with the other concerns regarding potential fire hazards*
- *I also agree with the concerns detailed below regarding water use*

I reviewed promotional videos and the project proposal for the expansion.

I agree with the following comments:

- The expansion will increase beginner terrain
- The expansion will increase parking

- The expansion will add other activities such as cross country skiing, which I could see myself enjoying

I disagree with the following comments:

- “Maintain the values of stewardship, community, and small mountain vibe – aka the MR way of life... keep our soul intact while growing. Keep our roots and our ties to the community”

I watched the promotional video for MR, with Dr. Freed, Mayor Frank Kuntz, and Shiloh Burgess. I moved here about 4 years ago from Seattle (transplanted from Indiana), so I am not a true local. I am a physician at Confluence Health and I was attracted to Wenatchee because of the ease of outdoor access, including Mission Ridge. On the same side of the coin, in Seattle I was already living close to 3 ski resorts – Crystal Mountain, Stevens Pass, and Snoqualmie Pass. Why would I move to Wenatchee when I had access to these larger mountains? The answer is that I wanted to get away from the crowds, traffic, and overcrowding of Seattle. Even after moving to Wenatchee, I still owned season passes to both MR and SP, but ultimately, after the overcrowding became too much at SP; my husband and I only own MR passes now. MR is special because it is a community asset. It is a local ski hill. Creating condominiums and housing up there is not needed because:

- Most locals already live <30 minutes from the hill
- The downtown area is already expanding with a number of new hotels
- The city itself is expanding with more homes being built throughout the valley as Wenatchee is expanding

If we are truly doing this project to benefit the community, unfortunately I see us losing our “local ski hill” vibe. We will become another touristy, overcrowded resort with traffic issues. The ability of the residents of Wenatchee to escape to the trails and find solitude will be permanently impacted. We will lose our small mountain vibe.

As we continue to attract physicians and other professionals to the area, how can we continue to distinguish ourselves as having a local ski hill with solitude when we are no longer the local ski hill, but rather a resort?

I do understand the positive financial impact of this expansion, but there are more sustainable options to positively impact our community than an apparent economic boost that is accompanied by the loss of our small mountain feel, with the current project proposal. If the housing structures of the project expansion were significantly downsized, thus reducing the demand on the area with too many users, I would be in greater agreement with this project.

I greatly appreciate your consideration of the potential impact of this project.

Sincerely,

Erin Andrade

From: [Adam Vognild](#)
To: [RJ Lott](#)
Subject: Opposition to the Mission Ridge Expansion project.
Date: Monday, March 30, 2020 6:02:55 PM

External Email Warning! This email originated from outside of Chelan County.

My name is Adam Vognild, I grew up in Wenatchee and have lived here most of my life. I'm opposing the Mission Ridge expansion project.

In the letter from Eugene N.J. St. Godard from the WNR Group dated December 31, 2019 he states the following conclusions and recommendations:

"The preliminary hydrogeologic investigation at the site has determined that the availability of future water needs may be present in deep bedrock fractures in the vicinity of the proposed Mission Ridge Expansion project as defined by EMS and VLF geophysical surveys. These fractures appear to be in some degree of hydraulic continuity with surface water in the Squilchuck Creek drainage. Several water rights are currently used at the Mission Ridge ski area for indoor use and snow making activities. Although these approved diversions are located within the lower drainage area, it appears that the deep bedrock aquifers may be the source for the intermittent creeks, and as such can be inferred to be within the same hydrologic water budget.

Proposed water use at the expansion project will primarily occur during winter and spring months when water is most available. Proposed snow making, a non consumptive use, will also be a benefit to creek flows in spring and summer months, by allowing additional snow pack melt to the creeks.

In summary, it is our opinion, that the potential availability of groundwater for domestic and snow making uses may be available from deep bedrock fractures at the site. These deep bedrock fractures appear to be in hydraulic continuity with the surface waters near the ski area where current water right diversions are being utilized."

I'd like to point out that the conclusion states "Proposed water use at the expansion project will primarily occur during winter and spring months when water is most available." Currently this project is slated to be a year around resort with up to 4000 people living there. This conclusion is in opposition the current expansion plan and needs to be evaluated to make sure that there is enough water for fire suppression, drinking water for 4000 people year around as well as snow making in the fall and winter.

The estimated five- to seven-fold increase in traffic on the Squilchuck Road will have a negative impact on people living on Squilchuck road and the south end of Wenatchee. This increase in traffic will not effect the developer at the end of the road. But does it consider

what it will do to locals who live in the area and have recreated in this corridor for decades? It seems irresponsible to allow this much of an increase in traffic given that the road can not be modified without a sizeable cost to Chelan County citizens.

It seems inconceivable for a project of this magnitude, that a septic system(s) for 4000 people placed in the soil and rock type of this expansion could be successful without impacting the existing downstream users of this watershed. Further analysis needs to be completed to guarantee no negative impact to all the people and orchards that this would affect if it failed.

Sincerely,

Adam Vognild

From: wedeters@nwi.net
To: RJ.Lott@chelancounty.org
Cc: Bob.Bugert@chelancounty.org; Doug.England@chelancounty.org; Kevin.Overbay@chelancounty.org
Subject: Proposed Mission Ridge Expansion Comments
Date: Monday, March 23, 2020 4:39:27 PM

External Email Warning! This email originated from outside of Chelan County.

RJ Lott, Planning Manager
Community Development Department
316 Washington St., Suite 301
Wenatchee, WA 98801

Re: Proposed Mission Ridge Expansion

Dear Mr. Lott,

I would like to comment regarding the proposed Mission Ridge Expansion Project.

The proposal has two major themes. One is ski area expansion. The other is a private, year-round real estate development roughly ten times the size of the nearby Forest Ridge community.

Below are several specific issues of particular concern:

The proposal violates the Stemilt Partnership Mission. Chelan County is the lead organization responsible for establishing the Partnership. The Partnership was formed in 2007 in response to concern over privatization and development of 2,500 acres of DNR forested land in the Stemilt Basin. In 2012 the County purchased 2,500 acres in order to prevent development in the forest. The Stemilt Partnership continues to meet to discuss management of the Stemilt-Squilchuck Community Forest. The mission of the Partnership is to protect water resources, conserve critical habitat for fish and wildlife, and maintain recreational access to public lands. The proposed development goes against the founding rationale of the Partnership and violates all three of its central goals by stealing from the water budget in the upper watershed; placing an urban environment in the forest which disrupts wildlife; and degrading existing recreational experiences by overpopulating all of the lands surrounding the development with too many visitors. How can the County even consider allowing the type of development that the Stemilt Partnership was formed to prevent?

Water resources: The Chelan County WRIA 40A Watershed Plan for the basin states, "Annual water rights are about 50 percent greater than the estimated quantity of physically available water. Water diverted for new storage may potentially impair senior rights and/or require mitigation of impacts to senior rights". The proposal assumes water will be available to operate and protect from wildfire the proposed 4000 pillow community, yet senior water rights held by downstream irrigating orchardists and others in the basin could result in no water availability for those purposes during wildfire season. The entire wintertime flow of Squilchuck Creek is allocated by existing water rights, while both Beehive Irrigation District

(senior water right) and Mission Ridge (junior water right) compete to fill their respective reservoirs. Existing water rights in Spring and Summer exceed the available flow in the creek, with some water users having their water rights regularly cut when the stream flow is inadequate to cover all existing water rights. The development proposes to drill wells and pump water from the deep aquifers which are hydraulically connected to the surface waters of the Squilchuck drainage. There is no available water to be removed from the aquifer, because any water that the development removes directly affects current water right holders who already consume the entire stream flow. One of the critical findings of the Stemilt – Squilchuck Community Vision is that the upper watershed cannot support Urban-level development, yet that is what has been proposed. The Hydrology Memorandums in the proposal, prepared by WNR Group, ignore these facts. They state “The preliminary hydrologic investigation at the site has determined that the availability of future water needs may (emphasis added) be present in deep bedrock fractures,” and “These deep bedrock fractures appear to be in hydraulic continuity with the surface waters near the ski area where current water right diversions are being utilized”. WNR Group assumes peak water usage will be during the ski season, yet the real estate development portions of the proposal are clearly year-round. WNR Group points to snowpack, but does not address forecasted climate change for east-side Cascades, and changes from snow to rain. It does not appear the basin can support existing water needs, let alone a small city. At the very least, the County needs to hire a Hydrologist to properly evaluate these uncertainties.

An alternative to taking water from the aquifer might be to construct a municipal system that pumps water from town. Water is currently supplied by the Chelan County PUD to Forest Ridge. However, the PUD has indicated in their October 18, 2018 Agency Comment letter on MPR 2018-128 that: “In summary, water service is considered not available at this time until determined permissible and feasible. Significant water system infrastructure will be required and the design, permitting, planning and construction of such infrastructure is a multiyear effort.” Until the water issue is resolved, the plan should not be approved.

Sewer Issues: Related to water resources, the proposal indicates that wastewater will be disposed of through dispersed on-site systems which deposit wastewater into the ground through drainfields. It seems likely that a municipality of this size (e.g., Cashmere has roughly the same population as the proposed development) would instead construct a wastewater treatment plant. How will these drainfields affect downstream users? Orchardists in the Squilchuck drainage irrigate with surface water from Squilchuck Creek. The water is tested on a regular basis during growing season for compliance with legislated food safety standards. If the surface water fails the quality tests, fruit cannot be picked. Who will bear financial responsibility if a 4000 bed community pollutes the Squilchuck drainage and jeopardizes the livelihood of current water rights holders?

Wildfire Risk and Habitat loss: In the Mission Ridge proposed Fire Protection Plan, AEGIS Engineering, PLLC (hired by the developers) states “The isolated location of the Mission Ridge site present inherent challenges with regard to access for emergency responders in the 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.”

Yet the same plan argues for exceptions from code-required fire flows, and cites County code 15.40.040 allowing downward modification of fire flow where full fire-flow requirements are impractical. The county code also contains a provision allowing the fire flow to be modified upward where conditions indicate an unusual susceptibility to group fires of conflagrations, as we have here. AEGIS Engineering completed the International Wildland – Urban Interface Code Fire Hazard Worksheet and the project scored as “high hazard”. The Subdivision Design scored at the highest levels for having a one – way road in/out, for having a dead – end road greater than 200 feet, and for portions of road grade exceeding 5%. The Vegetation Score was maximum for heavy fuel types, and for Defensible Space at less than 30%. If the development is allowed, homeowner insurance providers may choose not to offer coverage due to facts in this Fire Protection Plan.

RCW 36.70A.110 states that counties “....shall designate an urban growth area or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature.” The Mission Ridge area was not designated an Urban Growth Area by Chelan County. The Washington Legislature enacted this law because they “found that uncoordinated and unplanned growth posed a threat to the environment, sustainable economic development and quality of life in Washington.”

Clearly the development is in violation of this law and its intent.

The Traffic Study appended to the application indicates 9,468 average daily trips and 833 evening peak-hour trips will be generated by the resort. Table 7 of the report estimates 1,050 passenger cars per hour in the southbound direction and 930 passenger cars in the northbound direction, reducing the level-of-service (a quantitative measure describing traffic operational conditions and their perceptions by drivers) from LOS A (free flow) and B (stable flow), as the existing condition, to LOS D (high density and driver experiences a generally poor level of comfort and convenience) as the future condition. Compare this to the existing volumes listed in the table of 145 southbound cars and 177 northbound cars. This is a five- to seven-fold increase in traffic on the Squilchuck Road. The study argues that LOS D meets Chelan County Standard, but does it fairly consider the lifestyles of other residents bordering the Squilchuck Road? Does it meet our expectations as citizens of the Wenatchee Valley? This increase in traffic serves to enrich the developer, but it does so by degrading the lifestyles of current residents and undermining the recreational experiences of the entire community. Further, the adverse impact to wildlife in and around the proposed development and adjacent lands is significant.

Humans cause the majority of wildfires, and a development of this sort, which has people living and playing in wildfire-prone forests year – round, will increase the likelihood that wildfires will be ignited. Such fires will threaten not just this development but the much larger community down valley, and the wildlife throughout. This project must not be exempted from upholding the very strictest codes for fire protection, fire safety, and evacuation.

Thank You for the opportunity to comment.

William E. (Bill) Deters

2777 Number 1 Canyon Road

Wenatchee, WA 98801

509-423-4-5971

wedeters@nwi.net

From: [dave](#)
To: [RJ Lott](#); [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#)
Subject: Proposed Mission Ridge expansion
Date: Monday, March 30, 2020 3:38:54 PM

External Email Warning! This email originated from outside of Chelan County.

To Planning Manager and Commissioners of Chelan County,

I would like to comment on the proposed development by Mission Ridge. I believe the the permit should be denied. There are too many negative issues in my opinion and the request lacks important information regarding water, sewer and access. My objections are as follows:

- Water: Information provided is incomplete. There is no estimate of quantities needed. This should include all use including domestic and snow making. The large amounts of water required would take away from current users. The Squilchuck basin, Stemilt basin and springs on the Kittitas county are all connected in underground aquifers, and all will be impacted by the water usage of thousands of people. the hydrology report based conclusions on seasonal use, but the homes and businesses are intended for year round use. Springs like the two that feed the streams running across the proposed access road will likely be depleted, reducing flows to already stressed Squilchuck Creek.
- Sewer: Current plans essentially relies on septic systems. That can't possibly be adequate for a development that could be close in size to Cashmere. Any permit should include proper sewage treatment compared to a municipality of that size. The project is right or the line between Squilchuck and Stemilt drainages. Possible contaminants could threaten water for homes and orchards through a large area.
- Access road: The proposed access road crosses very steep terrain. the ground consists of broken rock and boulder in loose dirt. Similar road cuts on the road up to Mission Ridge are tapered up to 100 feet above the road and contain boulders that frequently land on the road. The steep hillside is not stable enough to be the lone access for so many people. Landslides and slumps are common in the Squilchuck and Stemilt basins. Just above the Mission Ridge lodge, two large slides have come off the run called Castle in the last few years.
- Traffic on Squilchuck Road: Traffic volume on Squilchuck Road will be increased about six times. This is a huge increase. The current road above Squilchuck State Park is hardly suitable for a population center of the size

proposed. There are times in the winter when I have been unable to drive up the road or have had to install chains. Cars sliding off the road in the winter are common. During the busy days of ski season, people park all along the road and ride buses up. This creates congestion and stoppages that will impact uphill and downhill traffic flow. Boulders can come down from the last mile or so of the road year round, especially when the soil is wet. Even with a fairly recent upgrade on the road there are problems with potholes and up-heaving asphalt. Additional traffic can only worsen the problems.

- Fire and fire access: Being surrounded by forest, the whole development is at risk. From the top of Mission Ridge, the basin looking west burned recently. A catastrophe many times worse than Broadview can easily be envisioned. Having one access, that could be subject to fires for the 12 miles all the way to town, is irresponsible.
- Urban growth: It appears to me the proposed development would be urban growth, well outside current boundaries. I would expect a long legal process if permits are issued.
- The proposed development agreement contains language that prevents the county requiring measures that might be specific to the development. The is in a unique location that is likely to require unique mitigation requirements. It seems unreasonable to me that they want to be exempt from fire access requirements and mitigation requirements.
- Other impacts: There are numerous other impacts to consider. The development blocks non-motorized areas that are popular with local skiers. The development will be highly visible from town. There will be a huge glow at night in the southern sky.

I am a long time Mission Ridge season pass holder and would like to see them succeed. However, the long list of adverse issues, and inadequately addressed issues leads me to ask that the permit for the proposed development be denied.

Thank you,
Dave Allyn
1451 Eastmont Ave
East Wenatchee, WA 98802

From: [Anna Gullickson](#)
To: comments-pacificnorthwest-wenatchee-wrrd@fs.fed.us
Cc: [RJ Lott](#); [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#)
Subject: Public Comment Mission Ridge Proposed Development
Date: Monday, March 30, 2020 3:24:00 PM

External Email Warning! This email originated from outside of Chelan County.

RCW 36.70A.110 states that counties “*....shall designate an urban growth area or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature.*” The Mission Ridge area was not designated an Urban Growth Area by Chelan County. The Washington Legislature enacted this law because they “*found that uncoordinated and unplanned growth posed a threat to the environment, sustainable economic development and quality of life in Washington.*”

The Mission Ridge Development would add 4000 pillows making it a community the size of Cashmere. Clearly the development is in violation of this law and its intent.

Good Afternoon and thank you for the opportunity to comment on this proposed development. I am in opposition to the proposal for the following reasons:

- As stated above this development is in violation of RCW 36.70A.110.
- I feel this proposal has been falsely marketed as "expanding the ski resort and a benefit to the local community", when in reality, it's literally just a development project with no benefit to the local community, instead multiple negative impacts.
- The area can not support the drilling of 600 individual wells and sewage systems.
- There is no proper egress in case of a fire or other emergency for a town the size of Cashmere up a steep, windy, snowy, two lane road.
- There will be an increase in accidents with the increase of travel on an inappropriate road for number and passing of people.
- There is a greater wildfire risk due to the increase of human inhabitance

And these are just to name a few.

I would hope that the resort owner would truly be interested in continuing to have the best interest of his local community in mind and at the forefront of his decisions. It continues to be said that there is wide support for this "expansion"/development, but I have yet to find anyone in the local community who believes it is in the locals' best interest or that it is simply a good thing to do. It seems it has been dishonestly promoted and I am strongly against it for the environment, the wildlife, the local community, the skiers, and as a recurring season pass holder.

Thank you for your sincere consideration,

Anna Gullickson
Cashmere, WA

From: James Lieberman
To: RJ Lott
Subject: STOP Mission Ridge Proposed Development
Date: Wednesday, March 25, 2020 2:06:27 PM
Attachments: page2image2647161088.png, page2image2647161376.png, page2image2647161664.png, page2image2647162144.png, page2image2647162432.png, page2image2647162720.png, page2image2647163232.png, page2image2647163648.png, page2image2647163936.png, page2image2647164224.png, page2image2647164512.png, page2image2647161856.png, page2image2647165088.png, page2image2647165376.png, page4image2647939328.png, page4image2647939616.png, page4image2647939904.png, page4image2647940384.png, page4image2647946656.png, page5image2648798064.png, page6image2648207728.png, page7image2648278464.png, page7image2648278752.png, page7image2648279040.png, page7image2648320368.png, page8image2649964704.png, page8image2649964992.png, page8image2649965280.png, page8image2649965760.png, page8image2649966048.png, page8image2649966336.png, page8image2649966848.png, page8image2649967264.png, page14image2566265408.png

External Email Warning! This email originated from outside of Chelan County.

Hi,

Below is obviously copied and pasted. However, it seems rather evident based on prior codes that the current plan is in violation on multiple counts. We need to be exceptionally careful with our wild lands. Now is certainly NOT the time for short cutting the process to allow developers easier access. Please do your job and make sure thought-out prior ordinances, like safe fire, water, natural resource allocations are preserved in a safe manner.

Thank you,

James Lieberman

1. Fire - Proposed Code Modifications are Irresponsible.

1a - Fire Flow (the quantity of water available for fire protection)

The [MR Proposed Development Fire Protection Plan](#) argues for exceptions from code-required fire flows and cites County code allowing downward modification of fire flow where full fire-flow requirements are impractical. The same county code, 15.40.040, also contains a provision allowing the fire flow to be modified upward where conditions indicate an unusual susceptibility to group fires of conflagrations.

[Link to County Code 15.40.040](#)

The County should deny the request for exceptions contained in the fire protection plan. In fact, the fire marshal should increase fire-flow requirements for this high-risk development placed in a fuel-rich dry

2

forest. The required fire flow is not impractical if the water supply comes from the PUD. However, the PUD has indicated in their October 18, 2018 Agency Comment letter on MPR 2018-128 that:

"In summary, water service is considered not available at this time until determined permissible and feasible. Significant water system infrastructure will be required and the design, permitting, planning and construction of such infrastructure is a multiyear effort."

This suggests that municipal water will not be immediately available. Until the water issue is resolved, the plan should not be approved.

1b - Ingress/Egress

The Mission Ridge Proposed Development includes only one way in and one way out. The proposed road will be built upslope of a steep sidehill. This geography results in an increased fire hazard from a fire that starts lower in the basin. Codes require an alternate exit to allow residents of the development an escape route in the event that a fire consumes the ingress route. An emerging catastrophic fire in the lower

reaches of Squilchuck creek will quickly overwhelm fire crews and prevent a response further up the drainage because of the one-way in and out road, and the lack of adequate safety zones. However, the submitted fire protection plan argues that section 104.8 of the International Fire Code allows the fire code official to grant modifications for individual cases when the strict letter of the code is impractical. The text of that code provision follows:

Modification to the code is allowed only when the modification does not lessen life and fire safety requirements. Having a 4,000-pillow community trapped by an engulfed access road during an emerging catastrophic fire is a grave threat to fire safety and to life. The road, as currently planned, upslope of a 30% (+) sidehill is unsuitable as a stand alone egress route.

The proposal should be reviewed with a life-safety bias for the public, not a financial bias benefiting a private developer and other businesses seeing opportunities within the project. To approve the single access layout of this project is irresponsible on the County's part. In light of the wildfire losses seen in recent years throughout the West (BC, Alberta, Washington, California, Colorado) it is well understood that a hot August fire could realistically engulf Mission Ridge's entire development despite fire-wise preparations. This risk cannot be mitigated with fuel breaks and defensible space. Consequently, granting an exemption on the requirement of two access roads could easily be defined as negligence on the County's part. Given the leanings of the Washington State Supreme Court to suspend governmental immunity to counties that have bent codes and regulations and that have experienced catastrophic losses as a result, the County puts itself in an untenable future position, legally and financially, by granting such an exemption.

[A] 104.8 Modifications

Where there are practical difficulties involved in carrying out the provisions of this code, the *fire code official* shall have the authority to grant modifications for individual cases, provided that the *fire code official* shall first find that special individual reason makes the strict letter of this code impractical and the modification is in compliance with the intent and purpose of this code and that such modification does not lessen health, life and fire safety requirements. The details of action granting modifications shall be recorded and entered in the files of the department of fire prevention.

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2. Fire - Fire Grief

County decision makers need only interview a few residents of the Broadview neighborhood who lost their homes in 2015 to understand the severe emotional strain and the disruption of life caused by the loss of a home. Subjecting nearly 900 people who will own homes/apartments/townhouses/condos in this new development to the potential loss of life and to the potential emotional strain from a major loss of property is an unjustified offset to the financial gain of a single developer and the cadre of business interests pushing this project.

3. Fire - Increased Population Increases Risk

The following two articles indicate that when people are closer to the forest, there is increased fire risk.

<https://www.pnas.org/content/111/2/746.full> <https://www.pnas.org/content/115/13/3314>

The California Department of Forestry and Fire Protection studying Californian wildfires from 2013 to 2017 determined the following causes: debris burning (13.8%), electrical power (9.4 %), vehicles (8.8%), equipment use (8.2%), arson (7%), lightning (6.4%), campfire (3.8%), playing with fire (1.4%), smoking (1.4%), miscellaneous (14.8%), undetermined (24.6%). Humans cause the majority of wildfires and a development of this sort, which has people living and playing in wildfire-prone forests will increase the likelihood that wildfires will be ignited in our local forests. Such fires will threaten not just this development but the much larger community down valley. This project must not be exempted from upholding the very strictest codes for fire protection, fire safety, and evacuation.

4. Water - No available extra water for domestic or snowmaking exists in the aquifer

The entire wintertime flow of Squilchuck Creek is allocated by existing water rights while both Beehive Irrigation District (senior water right) and Mission Ridge (junior water right) compete to fill their respective reservoirs. Existing water rights in the Spring and Summer exceed the available flow in the creek with Miller water users having their water rights regularly cut when the stream flow is inadequate to cover all existing water rights. The development proposes to drill wells and pump water from the deep aquifers which are hydraulically connected to the surface waters of the Squilchuck drainage. There is no available water to be removed from the aquifer. Any water that the development removes directly affects current water right holders who already consume the entire stream flow. One of the critical findings of the Stemilt Partnership's report is that the upper watershed cannot support Urban-level development, yet that is what has been proposed.

[Link to the Stemilt-Squilchuck Community Vision Brochure](#)

Page 13, Section 2.2.2 Results, of The WRIA 40A Watershed Plan dated May 2007 found the following: "...**most of the physically available water (runoff of precipitation, shallow groundwater, imported**

water) entering the WRIA 40A is withdrawn for beneficial uses."

"**Annual water rights are about 50% greater than the estimated quantity of physically available water. Water diverted for new storage may potentially impair senior rights and/or require mitigation of impacts to senior rights.**"

[Link to Chelan County Watershed plan for WRIA 40A](#)

An alternative to taking water from the aquifer might be to construct a municipal system that pumps water from town. Water is currently supplied by the Chelan County PUD to Forest Ridge. However, the PUD has indicated in their October 18, 2018 Agency Comment letter on MPR 2018-128 that:

"In summary, water service is considered not available at this time until determined permissible and feasible. Significant water system infrastructure will be required and the design, permitting, planning and construction of such infrastructure is a multiyear effort."

This suggests that municipal water will not be immediately available. Until the water issue is resolved, the plan should not be approved.

5. Sewer - Onsite septic systems

The proposal indicates that wastewater will be disposed of through dispersed on-site systems which deposit wastewater into the ground through drainfields. A drainfield is a biological system that depends on bacteria to process waste. How will this system perform under intermittent seasonal use? Can drain fields for 4000 pillows adequately prevent adverse effects to nature? It seems like any municipality of this size (e.g., Cashmere has roughly the same population as the proposed development) would construct a wastewater treatment plant, and not use dispersed septic systems with drainfields.

Orchardists in the Squilchuck drainage irrigate with surface water from Squilchuck Creek. The water is tested on a regular basis during growing season for compliance with legislated food safety standards. If the surface water fails the quality tests, fruit cannot be picked. Who will bear financial responsibility if a 4000 bed community pollutes the Squilchuck drainage and jeopardizes the livelihood of current water rights holders.

6. Traffic - 9468 Average Daily Trips

The Traffic Study appended to the application indicates 9,468 average daily trips and 833 evening peak-hour trips will be generated by the resort. Table 7 of the report estimates 1,050 passenger cars per hour in the southbound direction and 930 passenger cars in the northbound direction reducing the level-of-service (a quantitative measure describing traffic operational conditions and their perceptions by drivers) from LOS A (free flow) and B (stable flow), as the existing condition, to LOS D (high density and driver experiences a generally poor level of comfort and convenience) as the future condition. Compare this to the existing volumes listed in the table of 145 southbound cars and 177 northbound cars. This is a five- to seven-fold increase in traffic on the Squilchuck Road. The study argues that LOS D meets Chelan County Standard, but does it fairly consider the lifestyles of other residents bordering the Squilchuck Road and does it meet our expectations as citizens of the Wenatchee Valley? This increase in traffic serves to enrich the developer but it does so by degrading the lifestyles of current residents and undermining the recreational experiences of the entire community.

7. Stemilt Partnership Mission - Proposal Violates the Mission of the Partnership

The County is not only a member of the Stemilt Partnership, but is the lead organization responsible for establishing the Partnership. The Partnership was formed in 2007 in response to concern over privatization and development of 2,500 acres of DNR forested land in the Stemilt Basin. In 2012 the County purchased 2,500 acres in order to prevent development in the forest. The Stemilt Partnership continues to meet to discuss management of the Stemilt-Squilchuck Community Forest. This information comes straight from the County website. [LINK to County Website](#) The mission of the

Partnership is to protect water resources, conserve critical habitat for fish and wildlife, and maintain recreational access to public lands. The proposed development goes against the founding rationale of the Partnership and violates all three of its central goals by stealing from the water budget in the upper watershed; placing an urban environment in the forest which disrupts wildlife; and degrading existing recreational experiences by overpopulating all of the lands surrounding the development with too many visitors. How can the County even consider allowing the type of development that the Stemilt Partnership was formed to prevent?

The Trust for Public Land website has a good description of the reason for formation and the goals of the Stemilt Partnership.

[LINK to TPL Stemilt Partnership page](#)

8. Development Agreement - Ties the hands of the County

Page 25 of the Development Agreement contains clauses that limit the County from applying County codes and road standards "only to the extent that the code has been adopted by the County for application on a county wide basis". This clause eliminates the ability of technical staff and decision makers to use judgement in application of code and safety standards. The agreement may be written to the benefit of the developer and should be modified to the benefit of the County. The text of these provisions follows:

(1) Uniform Codes. The County may apply the then-current Washington State Building Code, Chapter 19.27 RCW, and other uniform construction codes to new applications for building permits necessary for the development of The Expansion throughout the Term of this Agreement, provided that any such uniform code shall apply to The Expansion only to the extent that the code has been adopted by the County for application on a county-wide basis.

(2) **Life/Safety Road Standards.** The County may impose the then- current road standards necessary to address life/safety issues and concerns, provided that any such life/safety road standard shall apply to The Expansion only to the extent such standard has been adopted by the County for application on a county-wide basis.

DEVELOPMENT AGREEMENT
Page 25 of 65
47Z9571-Development Agreement 1.16.2020

JEFFERS, DANIELSON, SONN & AYLWARD, P.S.
Attorneys at Law
(509) 662-3685 / FAX (509) 662-2452
2600 Chester Kimm Road / P.O. Box 1688
Wenatchee, WA 98807-1688

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9. Violates Washington law on Urban Growth Areas

RCW 36.70A.110 states that counties “....shall designate an urban growth area or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature. “ The Mission Ridge area was not designated an Urban Growth Area by Chelan County. The Washington Legislature enacted this law because they “found that uncoordinated and unplanned growth posed a threat to the environment, sustainable economic development and quality of life in Washington.” [Link to Environmental & Land Use Hearings Office](#) The Mission Ridge Development would add 4000 pillows making it a community the size of Cashmere. Clearly the development is in violation of this law and its intent.

Mission Ridge Expansion Project: Forest Service Draft Environment Analysis

Please use the links below to review the Draft Environmental Analysis released by the Forest Service as well as the scoping document from 2018 when the project was initiated.

- Mission Ridge Expansion Project: Draft Environmental Analysis Feb. 2020
- Temporary Road Map Set
- Categorical Exclusion for Temporary Road Letter
- Temporary Road Determination of Nonsignificance and Use of Categorical Exclusion adopted by WDFW
- Mission Ridge Proposed Expansion Scoping Supplemental Information Aug. 2018
- Mission Ridge Proposed Expansion Scoping Letter

Public Comment are Requested by March 27, 2020

Comments can be mailed to:

Jeffery Rivera, District Ranger Wenatchee River Ranger District 600 Sherbourne
Leavenworth, WA, 98826

Or provided by email to comments-pacificnorthwest-wenatchee-wrrd@fs.fed.us, or electronically filed using the [Forest Service online comment submission](#).

All comments must include your name and address to establish 'standing' to provide future comments about or object to the Final Environmental Assessment.

Objections to draft decisions "must be based on previously submitted specific written comments" 1

regarding the proposed project or activity and attributed to the objector." This means you must have raised the issue during public comment (which is occurring now) to have the 'standing' to object to the Final Environmental Assessment and Draft Decision/Finding of No Significant Impacts (FONSI). **So Make a comment NOW to establish a right to object later.**

Forest Service Policy and Substantive Comments

Make your comment count!

Comments on Environmental Assessments are not a voting process. It is not about the quantity of the comments, instead it is about raising specific concerns that relate to specific issues statements. Issue statements should establish the aspects of the project that concern you, how you believe the project *violates law, regulation, or policy*, and supporting reasons that the decision maker (responsible official in NEPA lingo) should consider.

The use of clear issue statements tied directly to the law, regulation, or policy that is violated is the ONLY type of comment that will directly shape and inform the Final Environmental Assessment and Draft Decision.

To be most helpful, comments should be as specific as possible.

- **A substantive comment provides new information about the Proposed Action, an alternative or the analysis;**
- **Identifies a different way to meet the need;**
- **Points out a specific flaw in the analysis;**
- **Suggests alternate methodologies and the reason(s) why they should be used;**
- **Makes factual corrections, or identifies a different source of credible research which, if used in the analysis, could result in different effects.”**

Some Issues specific to the Forest Service EA are listed below. If any of these issues is a concern to you, please feel free to use the information in your comments.

1. **Proposed Road across USFS land to access the private development - No trigger to allow Right of Way (ROW)**
2. **Current Temporary Road - Remediation Required**
3. **Fire - Insufficient Safety Zones for Responding Agencies**
4. **Special Use Permit (SUP) Violations - Disqualify the Holder from expanded SUP Consideration**
5. **Overuse Does Not Currently Exist - Overuse Will Develop with Plan Implementation**
6. **Administratively Withdrawn Areas - Plan Implementation Will Nullify the Value of ADMWD areas**

1. Proposed Road across USFS land to access the private development - No trigger to allow Right of Way (ROW)

Page 12 of the [Draft Environmental Analysis](#) discusses Forest Service Policy FSM2700 which guides the Forest Service in determining when to grant rights-of-ways across National Forest Land. The policy indicates that access should be granted when there is currently no access to the private property and when it is not possible to gain access across non-federal land.

There are existing roads that access the development property on section 19 from adjacent sections 18 and 20, neither of which are federally owned. Therefore, the trigger condition that would advise the USFS to allow access to private land across National Forest is not met. The USFS needs to provide a clear and defensible justification for allowing this road. If such justification cannot be provided, the

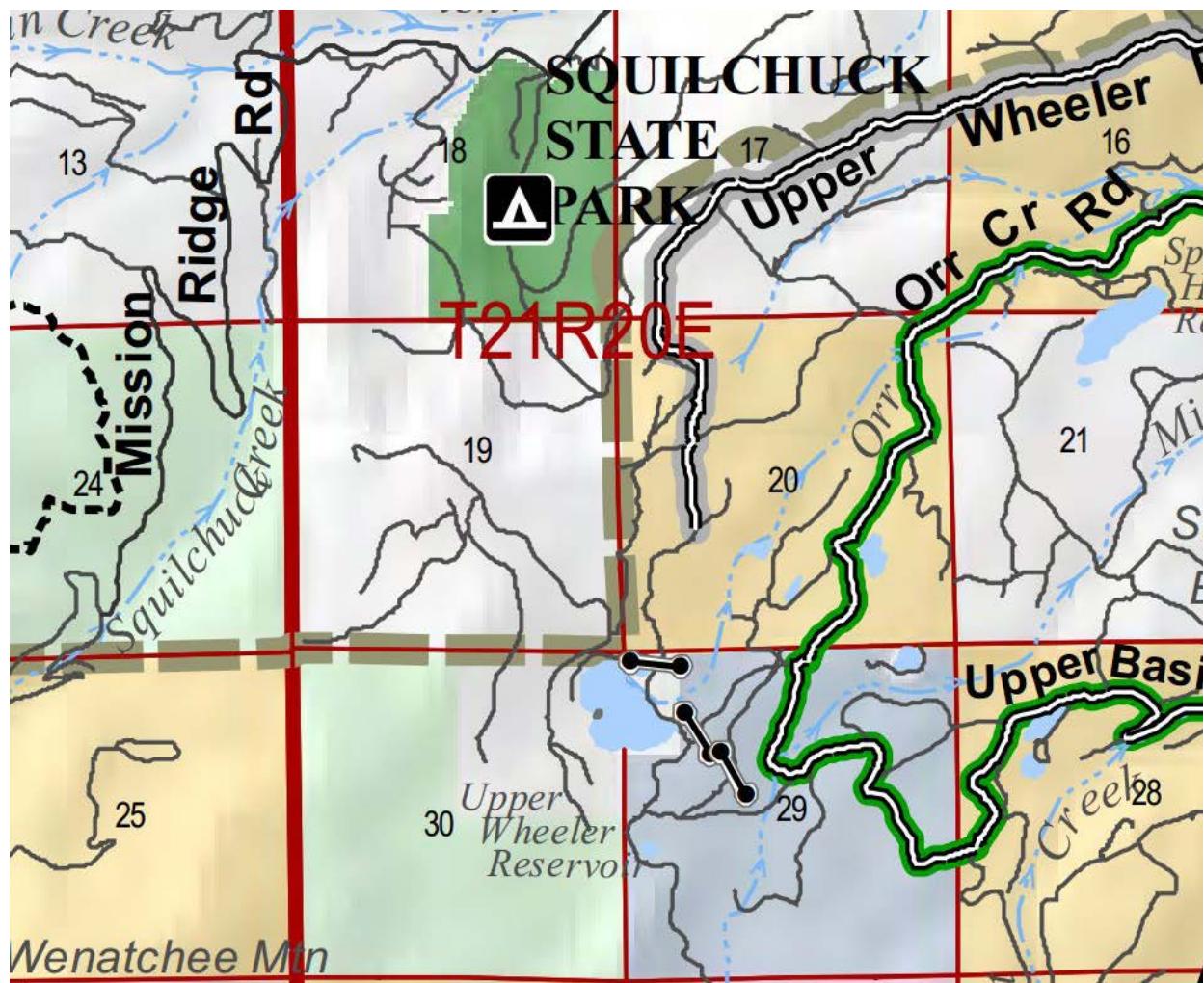
USFS should not grant right-of-way (ROW) and instead should require the use of alternative roads that do not cross lands managed by the USFS.

2. Current Temporary Road - Remediation Required

A temporary road was constructed in 2018 under Categorical Exclusion without public input and with no apparent supervision from the USFS. Categorical Exclusions are used by the Forest Service when the proposed work is so insignificant that to require a permit would create an unnecessary impediment to the work. It is arguable whether the categorical exclusions were appropriate, yet the damage is done. In response to the categorical exclusions, the Department of Fish and Wildlife issued a Determination of Nonsignificance (DNS) which listed several mitigating conditions. Several of these conditions were violated during road construction. Specific condition violations include the following:

2.1 The DNS requires that the ground disturbance not exceed 1-acre.

The actual ground disturbance exceeds 1-acre. Side cast extended up to 200 feet below the road. A conservative calculation of 0.67 miles x 50 foot average disturbance = 4 acres disturbed. This is four times the threshold allowed by the DNS.



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Photo - sidecast below road



Photo - sidecast below road

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2.2 The DNS requires that two temporary bridges be placed at stream crossings.

Bridges were not built.



Photo - Seasonal Stream where bridge was required but not built

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2.3 The DNS requires that trees greater than 8 inches diameter not be removed.

Trees greater than 8 inches were removed.

Photo - tree greater than 8 inch diameter

2.4 The DNS requires that the road will be built within the proposed development road corridor of 32 feet.

The road was not built within the proposed corridor. The photo below shows the proposed corridor in white overlain by a gps track of the

actual road which is shown in red.

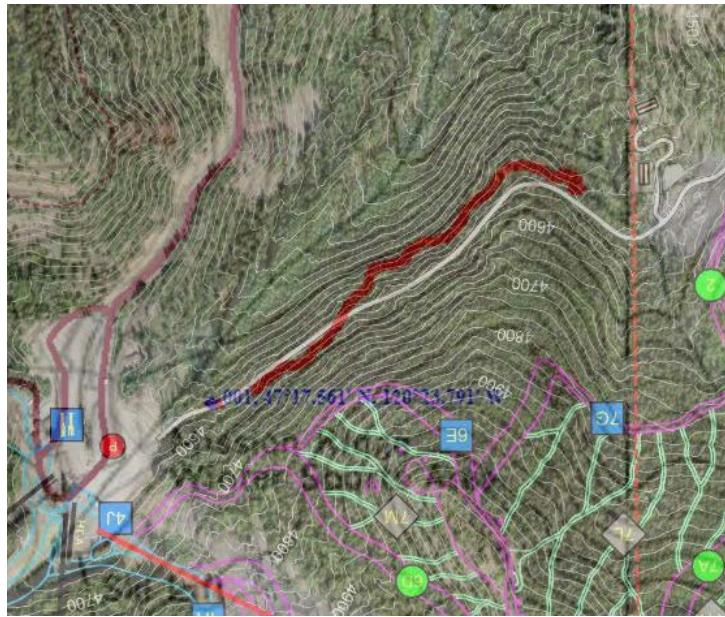


Photo - road overlay

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Since the road does not satisfy the conditions under which it was allowed, the USFS should require immediate and full restoration of the road. The USFS needs to provide a clear and defensible explanation as to how a major road construction project was allowed to be built without oversight and provide assurance to the public that other construction activities proposed by the applicant will be judged in a non-biased manner and constructed in compliance with the permit requirements.

3. Fire - Insufficient Safety Zones for Responding Agencies

Given the location of the proposed development, any fire response will be multi jurisdictional in nature. Responding agencies will include local rural fire departments, the Washington Department of Natural Resources (DNR), and the US Forest Service (USFS). All of these agencies adhere to the same safety standards. These standards place a priority on firefighter safety. Escape routes and Safety Zones are of foundational importance. Considerations for escape routes include fuel type and density, topography including slope steepness and orientation, chimneys, box or narrow canyons, number of routes, and travel time to Safety zZones.

Safety zones will be of a size and nature to protect all firefighters in a worst case scenario. For perspective, the Mission Ridge parking lot is approximately 7.0 acres and is located in the narrowest portion of a box canyon (one way in one way out) above a 20% slope with a mature conifer forest below. The USFS sets standards that require a safety zone of a size and nature that the crew of firefighters could find safety without the use of a fire shelter or other special equipment. One may argue that the Mission Ridge parking lot qualifies as a Safety Zone. It may satisfy the initial calculation of required size for a safety zone which assumes flat ground, no wind, and radiant heat

only. However, the Mission Ridge parking lot is not located on flat ground, and **no wind** is a non-conservative assumption. It is important to emphasize that emergency planning is required to consider worst case situations. For a minimal fire response crew (one engine) to be safe in the Mission Ridge Parking lot, with an upslope wind of 10 mph and 100 foot flame lengths, USFS standards require a Safety Zone over twice the size of the existing parking lot. Additionally any fire response will have to drive over 5 miles on a narrow canyon road with slope angles exceeding 20% most of the way to escape. The Squilchuck drainage has already been designated a high fire risk area. The Forest Service should take into account the role it will play permitting infrastructure that will someday place firefighters in a potentially compromised safety situation.

4. Special Use Permit (SUP) Violations - Disqualify the Holder from expanded SUP Consideration

The Special Use Permit issued to the Mission Ridge Resort in 1984, which does not expire until 2038, is for non-exclusive use of the land by the ski area and specifically requires that the land remain open to the public for all lawful purposes. However, the current ski area management has treated the land more like private property with a gate to prevent motorized entry, a sign that indicates authorized entry only, and wide area closures and policies that limit or prevents use of the land by the public. Specific to the backcountry community, the ski area's restrictive uphill policy is in direct violation of the SUP terms and conditions article F which states "...remain open for all legal purposes". Based on current management practices by the ski area, it is reasonable to assume that if the proposed USFS land in section 30 is included in the SUP area, that the public would be excluded from using this piece of land in similar fashion as the current SUP area. The proposed area is currently used and enjoyed by the backcountry community, and will be felt as a loss when Mission Ridge restricts access and use of the area. The USFS should enforce the requirements of the Special Use Permit and return management of

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the land to recent past practices which allowed public use of the public land and roads. If the SUP area is expanded, the USFS needs to monitor the permit holder and require that "*the lands and waters covered by this permit shall remain open to the public for all lawful purposes*" as stated in the Special Use Permit.

Photo - excerpt from Special Use Permit

Photo - gate at Mission Ridge

5. Overuse Does Not Currently Exist - Overuse Will Develop with Plan Implementation

On page 11 of the EA, under "Regulatory Framework: Management Direction and Guidance", The Wenatchee National Forest Land and Resource Management Plan (FLRMP) states: "New recreation sites should be constructed where demand is high and overuse problems are occurring at existing sites." The allure of the existing ski area and the adjacent backcountry areas in the Lake Clara Basin and the Stemilt Basin is exactly that the area is *not* overcrowded like other ski areas in Washington state. This plan will create an overcrowded recreation area in direct contrast to the goal of the guidance of the FLRMP. The recently created non-motorized winter recreation area in the Stemilt Basin will become largely useless with 4000 pillows located at the base of the skiing area. This increased population will impact trail use to Lake Clara as well, both by increased year round residential recreation, and by wintertime use of residents who chose not to ski in the ski area. More people skiing

F. Area Access. Except for any restrictions as the holder and the authorized officer may agree to be necessary to protect the installation and operation of authorized structures and developments, the lands and waters covered by this permit shall remain open to the public for all lawful purposes. To facilitate public use of this area, all existing roads or roads as may be constructed by the holder, shall remain open to the public, except for roads as may be closed by joint agreement of the holder and the authorized officer.



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on the same terrain does not improve the recreational experience for skiers at Mission Ridge. The proposal is contradictory to the guidance of the FLRMP because it causes overuse.

6. Administratively Withdrawn Areas - Plan Implementation Will Nullify the Value of ADMWD areas

On page 12 of the EA, under Northwest Forest Plan, Administratively Withdrawn Areas (ADMWD) are discussed. ADMWD areas are

designated both south of the proposed development, and west of the proposed development. These areas have been previously identified by the Forest as valuable for recreation, visual, and backcountry use. The proposed plan will degrade the value of all three of the stated values in both of the ADMWD areas. Visually, the night sky will be polluted by light, and the development will be visible from all points north and east, including from Highway 2 near Quincy. The premier and most easily accessible trail in the Wenatchee Mountains is the Lake Clara trail network. Recreational enjoyment of this trail will be damaged if a permanent population of 4000 pillows develops near the trail-head. Backcountry skiing is currently available and enjoyable in the two basins adjacent to the ski area. One of those basins will become side-country to the proposed development and the other will lose value as a destination due to the crowding from the development. The Forest Service needs to consider past valuations of the land before allowing proposed private development to degrade the value of two previously designated ADMWD areas.

From: [Sara Rolfs](#)
To: [RJ Lott](#)
Cc: [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#)
Subject: Tamarack LLC Development (Mission Ridge Expansion) Project Comments
Date: Monday, March 30, 2020 2:38:42 PM

External Email Warning! This email originated from outside of Chelan County.

RJ and Commissioners,

Thank you for the opportunity to provide feedback on the proposed development. I have several thoughts about the development.

As a resident of the upper Squilchuck Valley, I am concerned about the impact the proposed development will have on:

1. Traffic and road infrastructure. I am concerned about the volume of the anticipated traffic increase. Current infrastructure suffers damage each year as it is. If we increase trips I suspect this will worsen, not to mention the impact of the construction rigs hauling building materials. Additionally, the rural culture of the upper Squilchuck will suffer with increased year-round high volume traffic.

2. Wildfire Risk. The proposed development only has 1 way in and 1 way out. This is a disaster waiting to happen. We are well aware that the Squilchuck Valley is primed to have a catastrophic wildfire rip through. Much work has been done to try to mitigate fuel loads and create fire breaks. But, we aren't there yet. As a board member of the Forest Ridge Wildfire Coalition, we have been working on evacuation plans and trying to create fuel breaks around the current Forest Ridge Development (I do not live in Forest Ridge). Forest Ridge should be a 'lesson learned' about how NOT to allow large developments planned with 1 way in and 1 way out especially in fire prone areas. Allowing the proposed development in Section 19 increases the fire risk for all Squilchuck residents and in the case of evacuation will increase the load on infrastructure that is not built to accommodate the current residents well.

3. Water. Most years of the 18 we've lived up the Squilchuck, the water irrigation shares need to be cut before the growing season is over. This is because there is not enough water to support the owned water shares. Allowing a development the size of Cashmere on an already strained water situation is of grave concern to me. We use well water and cannot/do not want to afford to hook up to PUD water. I am concerned that the strain of the a development the size of the proposal will leave us no choice but to have to hook up to PUD water, which means that this private development will have an actual dollar cost impact on me.

4. OVOF. I am a big fan of the Our Valley, Our Future initiative, full disclosure - I am also on the board. I note that the Mission Ridge Expansion is an action item in Action Plan. However, I contend that the proposal submitted does not align with the stated action item. As it reads in the Action Plan, it asks for a 'small village of homes.....on private property that Mission Ridge Ski & Board Resort owns.' First, 'Small Village': I do not ever refer to Cashmere as a 'small village'. I call Cashmere a town or a small city. The proposed plan is for a 'village' the size of Cashmere. I think of Curlew (pop 118) when I think of a village. I do not think of 4000 people as a small village. Second, Mission Ridge does not own the development property. Tamarack

LLC owns the property. I think the assumption unsaid is that if Mission Ridge owns the property where the development happens, then profits from the development will be reinvested into Mission Ridge. This is not the case here. While Mr. Scrinavich owns both Tamarack and Mission Ridge - there is no guarantee that Mission Ridge will benefit from any of the profit making of Tamarack. Calling this project the 'Mission Ridge Expansion' is a bit of a misnomer. Expanding the skiable acres of Mission Ridge is minimal in this proposal. The focus is clearly on the construction of homes and retail sector and not on creating a better ski area.

I am not against any development. Having overnight accommodations near the Mission Ridge base area is a fine idea. My main concerns are about the size of the proposal and its impact on the current culture, infrastructure and ecosystem.

Thank you for your time.

Sincerely,

Sara Rolfs

From: [Marla Fox](#)
To: [RJ Lott](#); [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#)
Subject: Comment on Mission Ridge Expansion Application
Date: Thursday, March 26, 2020 11:56:33 AM
Attachments: [2020 03 25 Wenatchee Ski Development Comment.pdf](#)

External Email Warning! This email originated from outside of Chelan County.

Hello,

Attached please find a public comment on the Mission Ridge Expansion Application.

Thank you,
Marla Fox

From: [Marla Fox](#)
To: [RJ Lott](#); [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#)
Subject: Comment on Mission Ridge Expansion Application
Date: Thursday, March 26, 2020 11:56:33 AM
Attachments: [2020 03 25 Wenatchee Ski Development Comment.pdf](#)

External Email Warning! This email originated from outside of Chelan County.

Hello,

Attached please find a public comment on the Mission Ridge Expansion Application.

Thank you,
Marla Fox

From: [Kevin Kane](#)
To: [RJ Lott](#); aruncus2@msn.cm
Subject: Comments Mission Ridge Proposed Expansion change in scope
Date: Tuesday, March 31, 2020 11:26:48 PM
Attachments: [Letter to county 3312020.docx](#)

External Email Warning! This email originated from outside of Chelan County.

Here are my comments on the proposal changes in the proposed MIssion Ridge Expansion.

Thank you for the opportunity to comment, A reply that you received is requested.

Kevin Kane

From: [Kevin Kane](#)
To: [RJ Lott](#); aruncus2@msn.cm
Subject: Comments Mission Ridge Proposed Expansion change in scope
Date: Tuesday, March 31, 2020 11:26:48 PM
Attachments: [Letter to county 3312020.docx](#)

External Email Warning! This email originated from outside of Chelan County.

Here are my comments on the proposal changes in the proposed MIssion Ridge Expansion.

Thank you for the opportunity to comment, A reply that you received is requested.

Kevin Kane

From: [Lowell Skoog](#)
To: [RJ Lott](#)
Subject: Comments on Mission Ridge expansion plan, 2020
Date: Saturday, March 7, 2020 3:32:18 PM

External Email Warning! This email originated from outside of Chelan County.

7 March 2020

Dear Sir or Madam:

I would like to comment on the proposed expansion plan for Mission Ridge Ski Area currently under consideration by Chelan County and the U.S. Forest Service.

I am a Seattle resident and skier with many visits over the years to ski the lifts at Mission Ridge as well as the adjacent backcountry. I skied the chairlifts at Mission with several Wenatchee friends just a week ago. From my friends I heard about the proposed expansion plans and obtained more detailed information. My comments follow.

Summary:

I am concerned that the residential development proposal is too large and may be unsustainable in the long term. I am particularly concerned about fire safety and over-demand on available water sources. I feel that the proposal provides relatively minor improvements for recreational skiing, improvements that could be made without such a major residential development.

Specific Comments:

The proposal I'm reviewing is from Ecosign Mountain Resort Planners Ltd., dated 20 November 2019. It calls for 621 new Duplex/Condo/Townhome units, 275 Single Family Homes, 57 Lodge Rooms, and 80 beds for employee housing. Total Pillows estimated at 3800-4000, plus 11,000 square-feet of office space.

My first concern about the proposal regards fire safety. Wenatchee Mountain is dry, east-side forest. 2015 was the largest wildfire season in Washington state history. Homes around the town of Wenatchee were threatened and fire almost crossed Wenatchee Mountain from the heavily-burned southwest flank to the Squilchuck Basin where the ski area is located.

I believe that the proposed residential development would be indefensible in the event that fire swept through the Squilchuck Basin. I'm concerned that the single access road proposed for the new development would not be adequate to provide entry by firefighting resources, or exit by residents, in the event of a major fire.

I am also concerned about water sources for the proposed development. It's a dry area. Is there enough ground water in the area to support such a large development? Are there plans to pump water from another source, perhaps the Upper Wheeler Reservoir? It would be good to know what the plans are and how feasible they would be in light of other usage demands and expected climate change. The availability of water also bears on the risk posed to the development by wildfire.

I do think that the proposed ski lifts integrated with the proposal could be beneficial for Mission Ridge Ski Area. Mission doesn't have much beginner terrain, and I think the proposed Lift 8 would improve this. I'm not familiar enough with the terrain to judge what sort of skiing the proposed Lifts 6 and 7 would offer. These lift improvements, combined with a much smaller residential proposal, would be acceptable to me. I'm not in favor of the proposed Lift 5 because it would essentially eliminate the best backcountry skiing at Mission Ridge, into Stemilt Basin.

Beyond these site-specific comments, I'm concerned about the broader impact of the proposed development. It seems to me that the proposal is only minimally related to skiing and the ski area—it's chiefly a large, year-round real estate development. This will contribute substantially to traffic on the Squilchuck Creek road and will contribute to sprawl, generally, in the Wenatchee Valley. It probably won't contribute significantly to the viability of Mission Ridge as a ski area.

My conclusion is that the proposed development has significant environmental and safety issues that I would need to see addressed before I would consider supporting it.

Thank you for this opportunity to comment.

Lowell Skoog
1524 NE 88th Street
Seattle, WA 98115
lowell.skoog@alpenglow.org

From: [Lowell Skoog](#)
To: [RJ Lott](#)
Subject: Comments on Mission Ridge expansion plan, 2020
Date: Saturday, March 7, 2020 3:32:18 PM

External Email Warning! This email originated from outside of Chelan County.

7 March 2020

Dear Sir or Madam:

I would like to comment on the proposed expansion plan for Mission Ridge Ski Area currently under consideration by Chelan County and the U.S. Forest Service.

I am a Seattle resident and skier with many visits over the years to ski the lifts at Mission Ridge as well as the adjacent backcountry. I skied the chairlifts at Mission with several Wenatchee friends just a week ago. From my friends I heard about the proposed expansion plans and obtained more detailed information. My comments follow.

Summary:

I am concerned that the residential development proposal is too large and may be unsustainable in the long term. I am particularly concerned about fire safety and over-demand on available water sources. I feel that the proposal provides relatively minor improvements for recreational skiing, improvements that could be made without such a major residential development.

Specific Comments:

The proposal I'm reviewing is from Ecosign Mountain Resort Planners Ltd., dated 20 November 2019. It calls for 621 new Duplex/Condo/Townhome units, 275 Single Family Homes, 57 Lodge Rooms, and 80 beds for employee housing. Total Pillows estimated at 3800-4000, plus 11,000 square-feet of office space.

My first concern about the proposal regards fire safety. Wenatchee Mountain is dry, east-side forest. 2015 was the largest wildfire season in Washington state history. Homes around the town of Wenatchee were threatened and fire almost crossed Wenatchee Mountain from the heavily-burned southwest flank to the Squilchuck Basin where the ski area is located.

I believe that the proposed residential development would be indefensible in the event that fire swept through the Squilchuck Basin. I'm concerned that the single access road proposed for the new development would not be adequate to provide entry by firefighting resources, or exit by residents, in the event of a major fire.

I am also concerned about water sources for the proposed development. It's a dry area. Is there enough ground water in the area to support such a large development? Are there plans to pump water from another source, perhaps the Upper Wheeler Reservoir? It would be good to know what the plans are and how feasible they would be in light of other usage demands and expected climate change. The availability of water also bears on the risk posed to the development by wildfire.

I do think that the proposed ski lifts integrated with the proposal could be beneficial for Mission Ridge Ski Area. Mission doesn't have much beginner terrain, and I think the proposed Lift 8 would improve this. I'm not familiar enough with the terrain to judge what sort of skiing the proposed Lifts 6 and 7 would offer. These lift improvements, combined with a much smaller residential proposal, would be acceptable to me. I'm not in favor of the proposed Lift 5 because it would essentially eliminate the best backcountry skiing at Mission Ridge, into Stemilt Basin.

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1524 NE 88th Street
Seattle, WA 98115
lowell.skoog@alpenglow.org

From: [Andy Dappen](#)
To: [RJ Lott](#)
Cc: [Bob Bugert](#)
Subject: Comments on Mission Ridge Proposed Expansion
Date: Friday, March 27, 2020 2:22:46 PM
Attachments: [MissionRidgeExpansion-LetterCounty2-Andy.docx](#)

External Email Warning! This email originated from outside of Chelan County.

March 27, 2020

RJ Lott, Planning Manager;
Community Development Department
316 Washington St., Suite 301
Wenatchee, WA 98801

Re: Mission Ridge Proposed Expansion

Mr. RJ Lott,

In October 2018, I submitted the attached letter in regards to Tamarack Saddle LLC's proposed plans to develop a new ski village immediately east of the Mission Ridge Ski Area. I've attached the old letter to this comment because the very same issue pertaining to wildfire still exists and have not been adequately addressed.

Particularly during the hottest, driest months of the fire season, the safety of village residents and visitors are endangered if the County does not follow its own codes by insisting that there be two separate means of entering and exiting the development. Failure to have secondary access not only threatens the lives of villagers during an emerging large wildfire, it all but ensures that regional and federal firefighting resources will not be sent to the village to protect property. This is because agencies will not endanger the lives of their firefighters by sending them into the fire trap this development presents. Approving the project as it stands now makes the County complicit in endangering people's lives and exposing those people to great financial loss. Someday major wildfire will sweep through this development just as wildfires have done in faraway places like Colorado, California, and Alberta, and just as wildfires have done in nearby places like Pateros and Wenatchee itself.

The fire protection plan for Tamarack Saddle's Project Application argues that section 104.8 of the International Fire Code (IFC) allows the fire code official to grant modifications for individual cases when the code is impractical. The noted section of the IFC very clearly states that modifications are allowed only when they do not threaten life and fire safety requirements. Clearly there is a threat to life and fire safety if a growing summer wildfire engulfs the one road (an entirely realistic scenario) and leaves the occupants of a development with 4,000 beds with absolutely no means of escape and no safe way for other resources to help.

Not only could the wildfire losses to this development be immense, but those losses could put the county on trial, morally and maybe even legally, if the codes are ignored when the region's own recent history, when nationally known fire experts, and when its own citizens have given the county fair warning that the project's measures for contending with wildfire are grossly inadequate.

I made this point in the first letter and have researched it slightly, and I believe it's a point the

County's legal counsel should not take lightly. If the project is approved with only one road in and out, and if a wildfire catastrophe causes loss of life and great financial loss of property, could the county be held liable and financially responsible for negligence in violating its own codes? Some lawyers I've interviewed say the county would be given governmental immunity. Other lawyers have not been so confident that the county would escape being sued. In a number of cases the Washington State Supreme Court have swept away the protection of governmental immunity when a county's disregard of codes have resulted in catastrophic loss to the public it was entrusted to protect.

I urge you not to put our county in any such a position by strictly adhering to all codes meant to protect the public as they apply to this development. Chelan County should review the proposal with a leaning toward safety and full compliance with code, rather than demonstrate a willingness to make exceptions that benefit the developer but put the community and county itself at risk.

Another major issue with the proposed development, which applies tangentially to fire, is water. Different Squilchuck irrigation districts report the summer water in the entire drainage is already maxed-out and that during low-water years the pre-existing water rights of residents and farmers in the Squilchuck Valley are already not being met. This project claims to draw its water from deep aquifers but those familiar with the hydrology of the drainage know that the shallow and the deep water are connected, and that drawing from deeper water steals from the shallow water. In summer as the development draws water for domestic use and for its fire-protection needs, it will take water from those with pre-existing rights and a tangle of legal issues the county contributed toward will ensue. Before approving this plan, insist that the developer produce a study from a non-partial firm (and one approved by the different irrigation districts), that proves this development will not impact the water rights of everyone downstream (which is virtually everyone else in the Squilchuck drainage).

Between 2018 and now my concerns with the proposed village have grown well beyond fire (and water). I'm concerned about how the development will impact the migration, calving, and mating of the Colockum elk herd, an issue I suspect the Wenatchee Sportsmen will address with more authority, but a resource many of us don't want negatively impacted by the resort's spring, summer, and fall use. I'm concerned how the development violates the fundamental principles behind the formation of the Stemilt Partnership, which was formed to keep future development from damaging the water, wildlife, and recreation of the upper Stemilt Basin – all of those elements will be greatly impacted by all the people this development brings to live and play in the woods.

I'm concerned about the impact on traffic – use of the Squilchuck Road, the proposal's own study shows, will grow five to six fold. Is it right that one developer's property rights have such a large negative impact on everyone down canyon? This is why adherence to RCW 36.70A.110 matters. The Washington State Legislature enacted this law because "*uncoordinated and unplanned growth posed a threat to the environment, sustainable economic development and quality of life in Washington.*" The law says that counties "*shall designate an urban growth area or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature.*" Tamarack Saddle's village was not designated as an urban growth area by Chelan County but, with a bed base larger than the city of Cashmere, it is definitely urban in nature. It's not just a violation of the law itself but a case study for the problems that arise when urban-type growth is not carefully managed.

The developer hopes to squeeze through a loophole in the GMA allowing Master Planned Resorts (MPR) outside of the urban growth area. However, this development meets neither the intent nor character of an MPR and its designation as such is probably illegal. The development is not self-contained, does not consist of short-term visitor accommodations, and does not preserve the rural character of the upper Stemilt and Squilchuck basins or the rural nature of the lower Squilchuck valley between the ski area and Wenatchee. All of this is necessary for the development to qualify as

an MPR.

Connected to the problems arising from poorly managed growth is what will happen to Wenatchee itself once Tamarack Saddle begins an aggressive marketing campaign for its mountain village. Many West Side skiers fed up with the chaos of skiing Crystal Mountain, Snoqualmie Pass, and Stevens Pass will come looking into a second residence to enjoy skiing that's only 2.5 hours away. And once they come looking many will decide to purchase in Wenatchee itself rather than in the village. This will steadily escalate the cost of housing and property taxes within the city of Wenatchee, escalating the housing problems and gentrification issues the city is already experiencing.

In conclusion I will state the obvious: It's a terrible solution that purports to fix one problem (the ski area's long-term viability) but creates ten equally serious problems (increased hazard of fire creation, decreased fire protection and fire safety, battles over water rights, increased issues like traffic for pre-existing down-valley residents, over-use of surrounding public lands, violation of codes, violation of the Stemilt Partnership's, and degradation of the community fabric).

A solution that spawns a host of legal, environmental, and social problems needs to be rethought. There are other solutions to Tamarack Saddle's claims that the development is needed for the ski area to survive. Around the country, there are some 20-nonprofit ski hills run as community hills. Three examples are Bogus Basin (above Boise), Bridger Bowl (above Bozeman), and Mt. Spokane (above Spokane). All three of these operate as community hills rather than destination resorts, have equal or better infrastructure to Mission Ridge, are of similar size or larger, and cost 10 to 17 percent less to ski. And they are all surviving financially. If the owner is not making a suitable return on his investment and no longer wishes to run a community hill, one serious solution we should explore is turning this community asset over to community control.

Rather than starting a chain reaction of bad outcomes, say 'no' to this problematic proposal by enforcing all the codes the Proposed Expansion violates. Let the owner and/or the community rethink the single issue of how to make the finances of our hometown hill work while it continues operating as a hometown hill. We have a robust local ski community, and as a community working together, we can find a far better solution than the one Tamarack Saddle has spent several years 'selling' us.

Andy Dappen
2332 Westview Drive
Wenatchee, Washington 98801

P.S. Please send notice that this message was received and will be added to the public record.

From: [Andy Dappen](#)
To: [RJ Lott](#)
Cc: [Bob Bugert](#)
Subject: Comments on Mission Ridge Proposed Expansion
Date: Friday, March 27, 2020 2:22:46 PM
Attachments: [MissionRidgeExpansion-LetterCounty2-Andy.docx](#)

External Email Warning! This email originated from outside of Chelan County.

March 27, 2020

RJ Lott, Planning Manager;
Community Development Department
316 Washington St., Suite 301
Wenatchee, WA 98801

Re: Mission Ridge Proposed Expansion

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Andy Dappen
2332 Westview Drive
Wenatchee, Washington 98801

P.S. Please send notice that this message was received and will be added to the public record.

From: [Peggy Cahill](#)
To: [RJ Lott](#)
Cc: jim.brown@dfw.wa.gov; [Kevin Overbay](#); Gwen.Clear@ecy.wa.gov; wyatt.leighton@dnr.wa.gov; [Claudia M. Newman Henry](#); [Audrey Cluncheon](#)
Subject: Comments on Mission Ridge Ski Area's Amended Application for a Master Planned Resort Overlay District, Development Agreement, and SEPA Review
Date: Monday, March 30, 2020 12:40:41 PM
Attachments: [image001.png](#)
[2020 03 30 Newman to Lott - Comment Letter.pdf](#)
[2020 02 21 Newman and Cluncheon to Kaputa - Scoping Comments.pdf](#)

External Email Warning! This email originated from outside of Chelan County.

Dear Planning Manager Lott:

Attached please find a letter from Claudia Newman to you (and an attachment) regarding the above-referenced matter.

Thank you for your attention to this matter.



Peggy S. Cahill
Legal Assistant
Bricklin & Newman, LLP
1424 Fourth Avenue
Suite 500
Seattle WA 98101

ph.: 206.264.8600
fax: 206.264.9300

Spokane Office:
25 West Main
Suite 234
Spokane, WA 99201

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From: [Mike Rolfs PE](#)
To: [RJ Lott](#)
Cc: [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#); [Mike Kaputa](#)
Subject: Comments regarding the Mission Ridge 2020 Project Application
Date: Tuesday, March 24, 2020 12:46:58 PM
Attachments: [2020 Chelan County Comment Letter - MRR 2020-03-23.pdf](#)
[2018 Chelan County Comment Letter - MRR 2018-10-19.pdf](#)

External Email Warning! This email originated from outside of Chelan County.

Dear Mr. Lott,
Attached are my comments regarding the Mission Ridge 2020 Project Application. Also attached is the comment letter I submitted regarding the 2018 Mission Ridge Project Application. Those comments are still valid. Please respond to confirm that my comments have been received and recorded into the project record.

Thank you,
Mike Rolfs

From: [Mike Rolfs PE](#)
To: [RJ Lott](#)
Cc: [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#); [Mike Kaputa](#)
Subject: Comments regarding the Mission Ridge 2020 Project Application
Date: Tuesday, March 24, 2020 12:46:58 PM
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Thank you,
Mike Rolfs

RECEIVED

MAR 27 2020

1221 Madison Street
Wenatchee, WA 98801
March 25, 2020

CHELAN COUNTY
COMMUNITY DEVELOPMENT

R.J. Lott, Planning Manager
Community Development Department
316 Washington Street, Suite 301
Wenatchee, WA 98801

Dear Mr. Lott,

Thank you for allowing me to comment on the very important proposed Mission Ridge expansion which would take place on sections 19 and 30 near the current Mission Ridge Ski and Snowboard Resort.

Let me first say, I am not opposed to development on these private parcels. What however is remarkable, is that such an extensive development in this area would even be considered by any conscientious planning agency. The development, as proposed, would place a city with the population of Chelan - a city with a population larger than Cashmere, and nearly twice that of Leavenworth - in the middle of what is now defacto wilderness!

No doubt, due to the massive marketing campaign accomplished by the current owner of the land, you will receive numerous comments from the public in support of the Mission Ridge "expansion." This reminds me very much of the campaign by both Wenatchee and East Wenatchee Chambers of Commerce, all the government agencies, and most of the public in the 1980s concerning the riverfront highway. Those of us who opposed that highway were hated by every government agency, and by most of the public. However, what we have today instead of that riverfront highway, is a regionally renowned recreational loop trail, and a riverfront ultimately better in all respects. I have been proven correct in my assessment then, and I am certain that my assessment of the current Mission Ridge expansion proposal is correct today.

What we are facing now as a proposed development in the Squilchuck basin on sections 19 and 30, is not dissimilar from the situation we faced in the 1980s on the riverfront. The proposal for this development as submitted to Chelan County is unacceptable from an environmental standpoint. It is unacceptable from a public safety standpoint. It is unacceptable from a back country recreation standpoint. It is unacceptable from a "front country" recreational standpoint. It is unacceptable from the standpoint of: "What should the Squilchuck Basin and the Stemilt Basin look like twenty years from now?"

It also irks me that the development is presented to Chelan County and to the public as a way to expand and improve and enhance the Mission Ridge Ski and Snowboard Resort. In fact this is not so. Rather, this is a proposal that would enrich the developer, but it would not improve Mission Ridge skiing.

After reviewing the proposal, I have the following concerns:

First, I have fire risk concerns. This is a dry, forested area. Fire will occur from time to time. Human lives will be lost if the development is allowed as proposed. The proposed development of course would increase fire frequency. Not only is the developer proposing to place too large of a development in a high fire risk area, but he is proposing to skirt the usual requirement of at least TWO routes of ingress and egress. This flies in the face of the facts of fire risk in today's world.

RECEIVED

1-15-2020

CHELAN COUNTY
COMMUNITY DEVELOPMENT

Second, I have concerns about loss of back country recreational opportunities. Chelan County is an important part of the Stemilt Partnership. The Stemilt Partnership, over many years, has worked through, among many other issues, the need for non-motorized recreation opportunities in the area. Through much negotiation, it was determined that the Stemilt Basin would be set aside for non-motorized activities such as back country skiing and snowshoeing. **The Stemilt Basin has some of the most wonderful back country skiing in all of Chelan County!** With the current Mission Ridge development proposal, a city with twice the population of Leavenworth would be placed immediately adjacent to this wilderness recreational area. A small city cannot be placed adjacent to a wilderness without dramatically changing the recreational opportunities in that wilderness. This issue is not addressed anywhere in the proposal. At the very least, adequate parking for access to the Stemilt Basin needs to be addressed in the proposal, and it is not.

In addition, other areas used by back country skiers, snowshoers and hikers would become busier. Parking at the Clara Lake trailhead is already insufficient for current use. I see no plan in the current proposal to expand parking there.

Third, I have concerns regarding wildlife habitat: I know that in the past, the large elk herd in the area has been an important consideration. The development proposal does not address impact on that elk herd. I am certain that The Rocky Mountain Elk Foundation will have scientific data on this issue, and I would defer to their expertise. Obviously with the large human population proposed as well as the impact of the nearly 10,000 trip per day road into and out of the area, impact on countless other species needs to be more appropriately addressed.

Fourth, I have concerns regarding the impact on the skiing experience at Mission Ridge: The proposed development would, of course, markedly increase the numbers of skiers and snowboarders on any given day at the resort. Yet almost no increased ski terrain is proposed. The small amount of increased ski terrain proposed is nearly entirely beginner terrain. Therefore, for the local skier/snowboarder at the resort, this simply translates to a more crowded ski experience; and on powder days, the place would be "skied out" in minutes.

Fifth, I have concerns about other recreational opportunities: Along with a development the size proposed (or even if it were substantially smaller) there needs to be much more attention to recreation. Hiking/snowshoe trails need to be planned. Mountain bike trails need to be planned. I see that there is a pitifully small Nordic ski trail planned, which instead should be at least twenty kilometers long. And more importantly, there needs to be adequate parking planned for each of these. None of these important recreational assets are appropriately planned for in the proposal as it is today.

Sixth, I have concerns about water: We know that this is an extremely dry area. We know that the water in the area is already spoken for by the farmers in the area and downstream. According to The Squilchuck-Miller Water Users' Association, water use has had to be cut during 18 of the last 25 years. The amount of water use expected in the planned development would be ninety acre feet just for domestic use. This would, of course, dramatically lower the water table, and further cut water available downstream. How does the County propose to solve this water shortage issue? I would think that before any permit could be issued, the water shortage would have to be scientifically addressed. This is not addressed at all in the current plan as submitted to the county as far as I can see.

In summary, the so called Mission Ridge Expansion proposal, as it has been most recently submitted to Chelan County, is woefully inadequate, and in several ways inappropriate for the above reasons. I am sure you will receive numerous support letters from good local citizens who believe, as I do, that Mission Ridge is "our wonderful local ski area and it must be supported." However, the proposed development on sections 19 and 30 as it currently is presented to the County, is not what most of those folks think it is! I too support Mission ridge. I've already bought a season pass there for next season! **But, the so called Mission Ridge Expansion project, as most recently submitted, does not deserve the support of the public, and it certainly does not deserve the acceptance of the Chelan County Community Development Department.**

Respectfully,

Mark W. Shipman

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MAY 27 2009

CHELAN COUNTY
COMMUNITY DEVELOPMENT

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MAR 27 2020

1221 Madison Street
Wenatchee, WA 98801
March 25, 2020

CHELAN COUNTY
COMMUNITY DEVELOPMENT

R.J. Lott, Planning Manager
Community Development Department
316 Washington Street, Suite 301
Wenatchee, WA 98801

Dear Mr. Lott,

Thank you for allowing me to comment on the very important proposed Mission Ridge expansion which would take place on sections 19 and 30 near the current Mission Ridge Ski and Snowboard Resort.

Let me first say, I am not opposed to development on these private parcels. What however is remarkable, is that such an extensive development in this area would even be considered by any conscientious planning agency. The development, as proposed, would place a city with the population of Chelan - a city with a population larger than Cashmere, and nearly twice that of Leavenworth - in the middle of what is now defacto wilderness!

No doubt, due to the massive marketing campaign accomplished by the current owner of the land, you will receive numerous comments from the public in support of the Mission Ridge "expansion." This reminds me very much of the campaign by both Wenatchee and East Wenatchee Chambers of Commerce, all the government agencies, and most of the public in the 1980s concerning the riverfront highway. Those of us who opposed that highway were hated by every government agency, and by most of the public. However, what we have today instead of that riverfront highway, is a regionally renowned recreational loop trail, and a riverfront ultimately better in all respects. I have been proven correct in my assessment then, and I am certain that my assessment of the current Mission Ridge expansion proposal is correct today.

What we are facing now as a proposed development in the Squilchuck basin on sections 19 and 30, is not dissimilar from the situation we faced in the 1980s on the riverfront. The proposal for this development as submitted to Chelan County is unacceptable from an environmental standpoint. It is unacceptable from a public safety standpoint. It is unacceptable from a back country recreation standpoint. It is unacceptable from a "front country" recreational standpoint. It is unacceptable from the standpoint of: "What should the Squilchuck Basin and the Stemilt Basin look like twenty years from now?"

It also irks me that the development is presented to Chelan County and to the public as a way to expand and improve and enhance the Mission Ridge Ski and Snowboard Resort. In fact this is not so. Rather, this is a proposal that would enrich the developer, but it would not improve Mission Ridge skiing.

After reviewing the proposal, I have the following concerns:

First, I have fire risk concerns. This is a dry, forested area. Fire will occur from time to time. Human lives will be lost if the development is allowed as proposed. The proposed development of course would increase fire frequency. Not only is the developer proposing to place too large of a development in a high fire risk area, but he is proposing to skirt the usual requirement of at least TWO routes of ingress and egress. This flies in the face of the facts of fire risk in today's world.

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1-15-2020

CHELAN COUNTY
COMMUNITY DEVELOPMENT

Second, I have concerns about loss of back country recreational opportunities. Chelan County is an important part of the Stemilt Partnership. The Stemilt Partnership, over many years, has worked through, among many other issues, the need for non-motorized recreation opportunities in the area. Through much negotiation, it was determined that the Stemilt Basin would be set aside for non-motorized activities such as back country skiing and snowshoeing. **The Stemilt Basin has some of the most wonderful back country skiing in all of Chelan County!** With the current Mission Ridge development proposal, a city with twice the population of Leavenworth would be placed immediately adjacent to this wilderness recreational area. A small city cannot be placed adjacent to a wilderness without dramatically changing the recreational opportunities in that wilderness. This issue is not addressed anywhere in the proposal. At the very least, adequate parking for access to the Stemilt Basin needs to be addressed in the proposal, and it is not.

In addition, other areas used by back country skiers, snowshoers and hikers would become busier. Parking at the Clara Lake trailhead is already insufficient for current use. I see no plan in the current proposal to expand parking there.

Third, I have concerns regarding wildlife habitat: I know that in the past, the large elk herd in the area has been an important consideration. The development proposal does not address impact on that elk herd. I am certain that The Rocky Mountain Elk Foundation will have scientific data on this issue, and I would defer to their expertise. Obviously with the large human population proposed as well as the impact of the nearly 10,000 trip per day road into and out of the area, impact on countless other species needs to be more appropriately addressed.

Fourth, I have concerns regarding the impact on the skiing experience at Mission Ridge: The proposed development would, of course, markedly increase the numbers of skiers and snowboarders on any given day at the resort. Yet almost no increased ski terrain is proposed. The small amount of increased ski terrain proposed is nearly entirely beginner terrain. Therefore, for the local skier/snowboarder at the resort, this simply translates to a more crowded ski experience; and on powder days, the place would be "skied out" in minutes.

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Mark W. Shipman

RECEIVED

MAY 27 2009

CHELAN COUNTY
COMMUNITY DEVELOPMENT

Stuart Smith
3096 Tamarack Pl
Wenatchee, WA 98801

RECEIVED

MAR 27 2020

R. J. Lott
Planning Manager
Chelan County Department of Community Development

CHELAN COUNTY
COMMUNITY DEVELOPMENT

March 25, 2020

Dear R. J.,

Thank you for the opportunity to comment on the proposed expansion at the Mission Ridge ski area. I am in opposition to the proposal for the following reasons:

Most importantly, this proposal is nothing more than a thinly-veiled disguise to market (and subsequently churn) real estate. It has everything to do with profiting from real estate transactions, and little to do with skiing, and I resent that it is being sold to the community as a skiing "enhancement". Rather than improving the skiing experience, it will place an undue burden on the local services and infrastructure to accommodate and clean up after this development.

In addition to the profiteering aspect of the development, I am opposed to more people (a potentially Cashmere-sized population!) living high up Squilchuck canyon for the following reasons:

1. The only access is via a narrow, twisting, one-way county road. During the inevitable wildland fire, the additional panicked traffic down that road will create conditions that contribute to a deadly human disaster.
2. Speaking of wildland fire, thousands of vacationers (many of whom with no understanding about living in a fire-prone environment) staying at the development during the dry summer will only exacerbate the risk of human-caused fire in the area.
3. The proposed road between the existing ski area parking lot and the proposed housing area has serious engineering and environmental concerns.
4. A development of this magnitude will draw considerable water for human and commercial use, negatively impacting in-stream flow for fish and other downstream species.
5. Proper sewage disposal will be impossible with a development of this size. The future public will be left to clean up the increased bacterial and turbidity load in Squilchuck Creek.
6. Local authorities will be hard-pressed to pay for and accommodate this remotely-located community regarding fire, police, first responders, planning, inspections, and the myriad of other legally-required governmental actions and oversight. Here's but one, of many, examples: How will the county road department, with an already-stretched budget, handle the more frequent maintenance and repair requirements on Squilchuck road and its many bridges from the increased traffic?

Stuart Smith
3096 Tamarack Pl
Wenatchee, WA 98801

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MAR 27 2020

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RJ Lott

From: Mark Kacmarcik <mark.kacmarcik@gmail.com>
Sent: Friday, April 10, 2020 7:30 PM
To: RJ.Lott@co.chelan.wa.us
Cc: kevin.overbay@co.chelan.wa.us; Bob Bugert; doug.england@co.chelan.wa.us
Subject: Proposed Mission Ridge Expansion

External Email Warning! This email originated from outside of Chelan County.

Dear Mr. Lott (cc: commissioners Overbay, Bugert, and England):

I am a resident of Wenatchee and providing comment on the proposed Mission Ridge Expansion. I am a skier and buy a ski pass to Mission Ridge every year. I support our town and I support Mission Ridge, however i cannot support this proposed development. In short, i strongly urge you to stop, or require significant reduction in the magnitude of this proposed development.

As an avid recreationalist and County resident i can think of no greater negative impact on our recreational opportunities, dark skies, wildlife, and County residents than to allow construction of a 4,000-person-town at Mission Ridge. After reviewing the submitted documents i have come to the overall opinion that this is a private real estate development which endeavors to extort the County infrastructure, National forest access, Wenatchee valley viewshed, water quality, forest health, and taxpayer dollars for their own marketing and personal profit.

The proposal has little to do with skiing, or with the well-being of Wenatchee. This is a private real estate development that is absolutely incompatible with the geography of the Squilchuck Valley.

I encourage the Commissioners to uphold County development ordinances, land use codes, partnerships, and guidance and look out for the welfare of County residents and visitors. I highlight my largest objections to this proposal below:

1. The proposed development is situated in an area of high fire danger, with only ONE means of ingress/egress--narrow, winding, landslide-prone, Squilchuck road. Many experts have vocalized that people will die if this project is constructed. This risk is simply too much to bear. We saw this in 2015. Mission Ridge need not be the next Paradise, California.
2. The proposed development calls for use of septic systems for wastewater treatment. The shallow rocky soils of mission ridge are not well suited to this type of wastewater treatment. This is an environmental and human health concern. This project, which endeavors to install a small city the size of present-day Cashmere, up the Squilchuck Valley should NOT be allowed without modern wastewater treatment. Approval of this development should not come without a requirement to construct a suitably sized treatment plant to treat the waste and provisions for build-out. It is not fair for responsible County taxpayers to cover this expensive infrastructure.
3. As mentioned above, the submitted traffic study notes HUGE and nearly unimaginable increases in traffic volume on Squilchuck Road. Undoubtedly this will negatively impact valley residents and put enormous strain on County infrastructure. The road is landslide prone and another substantial risk of blockage to ingress or

egress to the development. This development should not be permitted without a requirement for the development to pay for improvements to this road.

4. As an avid backcountry skier, hiker, runner, and bird watcher I am saddened to think of the degradation of the outdoor experience with so many additional people residing up this valley. What is now a remote and wild area with opportunities to recreate, observe nature, hunt, fish, and explore will be degraded and overcrowded as an urban or suburban area. Perhaps selfishly, I'm sad that this proposal seeks to degrade these activities through overcrowded and overuse of a relatively small area. There are truly limited areas in the County where you can take improved roads to access these sorts of environments. The convenient access from Wenatchee to Mission Ridge is a great way to quickly visit the snow, to experience temperatures 10-15 degrees cooler than town in the heat of summer, and away from the bustle of town. This development will detract from that experience, pressure the surrounding environment, and require more driving and expense for residents to find quiet solace.

5. While it is somewhat endearing to see the Mission Ridge night-skiing lights visible from town, they are on for a short time and for limited evenings during operation. I am frankly disgusted at the thought of looking up from wenatchee and seeing the light pollution and development scars of this proposed real estate development. Please protect the scenic beauty of our town.

6. The current paradigm at Mission Ridge is for day use. Very few folks spend the night camping in the parking lot. Skiers drive or bus up in the mornings and down in the afternoon. It's dark and quiet at night. This allows some reprieve for residents and wildlife. Folks from out of town stay in hotels or rental housing and support local businesses, they shop locally. Installation of a large private development does not support our towns-- Wenatchee will become a frustrating traffic jam on the way to Mission Ridge where folks will spend their time at theri private condos.

7. Lastly, it strikes me that this development goes against what makes Mission Ridge a great place to ski. It goes against the fun friendly local vibe where skiing is fun and available for locals. It seeks to irresponsibly develop a private resort for the benefit of the few and at the expense of our local residents and County infrastructure.

This proposal comes with heavy marketing campaign touting jobs, economic development, growth, etc. The marketing includes convincing heartstring-pulling videos which are heavily produced by paid marketing firms to "sell" the idea of this development as a community asset. What these films and commercials do not show are:

- traffic jams on Squilchuck Road,
- community meetings of distraught Squilchuck valley residents upset by unwanted traffic, noise, and roadway widenings
- Landslides blocking Mission Ridge access,
- Editorials from distraught locals about the loss of quiet recreational areas close to home.
- Light pollution,
- Contaminated soils and water from parking lots, sewage lagoons, septic tanks,
- Water shortages and rationing and calls for construction of water lines, treatment facilities, pump stations, and infrastructure to produce water for the ill-conceived town,
- Members of the Stemilt Partnership angry at the County failing to follow up on their commitments.
- These marketing videos do not show animations of people terrified as a fire threatens their home with no way to escape.

I hope that you can see through the marketing and see this for what it is--a terrible idea.

Wenatchee is truly Washington's only real ski town. A small, uncrowded, local hill that's cherished by the town, where you can ski with your friends on uncrowded slopes, support the local business, and enjoy a unique experience in this day and age. It's a key reason why we moved here.

Please stop or significantly reduce this development.

I support the well-researched arguments made by the El Sendero organization and Mr. Mike Rolfs, which have been shared with me. I expect that all of these well researched arguments against this development will be addressed in a thorough, rational, and unbiased manner.

thank you for your time and consideration,

Mark Kacmarcik
140 S. Emerson Ave
Wenatchee, WA 98801

From: [Chester](#)
To: [RJ Lott](#)
Subject: Fwd: Mission Ridge Expansion Proposal
Date: Tuesday, March 10, 2020 2:26:29 PM

External Email Warning! This email originated from outside of Chelan County.

Subject:Mission Ridge Expansion Proposal

Date:Tue, 10 Mar 2020 13:15:03 -0700

From:Chester <northfork@nwi.net>

To:rj.lott@co.chelan.wa.us

Comments on Mission Ridge Expansion Proposal:

I support the Mission Ridge Proposal in concept, with several specific remarks described below. The Okanogan-Wenatchee National Forest Draft EA substantially justifies the project in its Purpose and Need section, and will not be duplicated here. However, the USFS Purpose and Need narrative supports the project in concept only, and does not refer to the specific scale of the final village build-out described in the Mission Ridge Resort Development Application sent to Chelan County (the project narrative). The 900-plus accommodation units is a large development, approaching the population (pillow count) of a small town. As a matter of comparison, the 1980s Constellation Ridge Resort proposal called for significantly less housing units, although greater ski terrain. It is interesting to note that the Constellation EIS mentioned the proponent's desire to utilize PUD water for their domestic water needs. Given the scale of the present Mission Ridge proposal, the use of PUD water would alleviate concerns over stressing the water capacity from the use of wells drilled within the boundary of the Squilchuck watershed. This watershed is already taxed, and it would seem risky to jeopardize it with a major water withdrawal for the proposed village. I assume water districts in the Squilchuck will strongly oppose such withdrawal. PUD water offers a guaranteed supply. Assuming the project will have the positive economic impact for the county that are projected, PUD involvement could be justified. Further, the scale of the resort (# of overnight units) should be examined closely by Chelan County; Is the 900-plus capacity the minimum needed for financial viability, or would a more modest total create a successful project with less impact on Squilchuck Road traffic, and soften other environmental issues? Other aspects of the village--beginner terrain, snow-play, additional parking, nordic trails, lift access, etc.--are vital and will doubtless further support the viability of Mission Ridge.

Respectfully,

Chester Marler--retired administrative staff, Stevens Pass ski Resort

Leavenworth, WA

From: [Chester](#)
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Leavenworth, WA

From: [Shannon Claeson](#)
To: [RJ Lott](#)
Subject: Mission Ridge development application
Date: Thursday, March 12, 2020 9:43:29 AM
Attachments: [Chelan Co_Mission Ridge comment letter.docx](#)

External Email Warning! This email originated from outside of Chelan County.

RJ Lott,
Please see the attached comment letter to Mission Ridge - Notice of Amended Application (file # MPR 2018-128).
Thank you, Shannon Claeson

From: [Shannon Claeson](#)
To: [RJ Lott](#)
Subject: Mission Ridge development application
Date: Thursday, March 12, 2020 9:43:29 AM
Attachments: [Chelan Co_Mission Ridge comment letter.docx](#)

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Please see the attached comment letter to Mission Ridge - Notice of Amended Application (file # MPR 2018-128).
Thank you, Shannon Claeson

From: [Cody Gillin](#)
To: [RJ Lott](#)
Subject: Mission Ridge Expansion Master Planned Resort comment
Date: Thursday, March 26, 2020 11:03:17 PM

External Email Warning! This email originated from outside of Chelan County.

Dear Mr. Lott,

Thank you for the opportunity comment on the proposed Mission Ridge expansion. I understand Chelan County Community Development takes seriously its responsibility to review proposed developments and consider the perspectives/findings of interested members of the public. After reviewing the proposal narrative, appendices, and other pertinent documents, I identified deficiencies in the proposal documents as well as misalignment between proposal information pertaining to growth and resource management in Chelan County and Washington State. Here is a summary of my review and conclusions:

1. Affordable Housing: The expansion proposal forecasts no problems with resort employees securing affordable housing either in dedicated workforce housing at the new village complex or elsewhere in the Wenatchee Valley. This runs contradictory to the Our Valley Our Future initiative's recent report on affordable housing in the Wenatchee Valley and surrounding areas. The OVOF housing report identified a direct link between a lack of affordable housing with an inability of major employers to fill vacancies as well as families double-occupying dwelling units. The report goes on to list many factors that contribute to a growing lack of affordable housing, all of which are out of the purview of the expansion proposal. In communities with large ski resorts and live-in villages, the gap in housing affordability is actually wider than other nearby locations (this is a well-documented problem that results from the housing stocks being converted to vacation homes and short-term rentals that either sit vacant most of the year or are unavailable for a low-wage workforce that operates and maintain a ski area, village, and on-site services). The expansion proposal housing report appears to not have considered any of the information or documentation on this problem. Since Chelan County is a sponsor and board member of the OVOF initiative, it should ensure that new developments in the region align with the recommendations emerging from the OVOF process, including making strides to improve (not exacerbate the existing deficiency of) affordable housing.
2. Wildfire, Fire-Flow, and Ingress-Egress: The proposed expansion would place hundreds of structures and thousands of people into a high-risk wildfire area where fire is a healthy, necessary component of a functioning ecosystem. As presently proposed, the expansion is requesting downward modifications to existing Chelan County code for fire flow/fire protection (15.40.040). Ingress and egress would be available on only a single road constructed on a steep slope with the village located upslope. A community with a population the size of Cashmere situated upslope of a sure-to-burn-forest with only one way out and inadequate fire flow protection poses grave threat to public safety. No municipal water supply is presently available to support fireflows.
3. Water Availability: At present, winter and summer streamflows in Squilchuck Creek are allocated and during low-flow periods are overallocated. The Stemilt-Squilchuck Watershed Plan identifies several reasons to be extremely cautious with the proposed new development, and only one indecisive result which could support new development in that "a portion of winter and spring runoff, return flow from irrigation and base flow may be available for diversion to new or additional storage" (there is no irrigation return flow that high in the basin so all water needed for the expansion would come from base flow). The proposed expansion appears to require an undefined rate/quantity of additional water for domestic and snowmaking purposes that would be supplied by drilling deep wells into the

upper Squilchuck Basin aquifer. The Hydrology Memo is vague and hesitant in its conclusions that “the availability of future water needs *may* be present in deep bedrock fractures in the vicinity of the proposed Mission Ridge Expansion project” and “the *potential* availability of groundwater for domestic and snow making uses *may* be available from deep bedrock fractures at the site”. The Hydrology Memo indicates that the deep bedrock fractures where drilling is recommended “appear to be in hydraulic continuity with the surface waters near the ski area where current water right diversions are being utilized”. If surface water flows are at best fully allocated (as indicated in the Stemilt-Squilchuck Watershed Plan) and the proposed groundwater supply is in connectivity with surface water then new withdrawals from the aquifer could steal water from existing water right holders. No municipal water supply is presently available to support domestic and/or snowmaking purposes.

4. Urban Growth and Community Vision: RCW 36.70A.110 requires counties to “designate an urban growth area or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature.” The proposed expansion adds 4000 pillows (analogous to the population of Cashmere), which is urban growth in nature and seems to be in violation the intent of Washington urban growth law. Furthermore, the expansion proposal does not seem to align with the Stemilt-Squilchuck Community Vision (in which Chelan County was a lead partner) which found that the upper Squilchuck Basin cannot support urban-level development (an expansion to include hundreds of condominiums, restaurants, lodges, transportation, and other services to support 4000 overnight residents and many thousands more day users is unmistakably urban).

5. Community Cost-Benefit Comments/Observations: The proposed development, if realized, would offer some benefits to recreation and the economy. There could be new opportunities for hikers, mountain bikers, trail runners, and Nordic skiers. Additional terrain will be opened for downhill skiing. An expanded resort will provide jobs and visitors will patronize local businesses. But there also appears to be great risk of many deleterious, irreversible impacts. Water supplies will be compromised in an already thirsty region. Wildlife habitat will be reduced in an already fragmented area. Traffic is projected to increase over five-fold and greatly reduce the current level of service in the travel route. Wildfire risk will increase and pose threats to a community that is already struggling to cope with increased frequency, magnitude, and intensity of fire. Wildfire protection, as proposed, is lacking. The way of life for the rural Squilchuck community already pressured by development and increased recreation will be irreversibly altered. A greater strain will be placed on already deficient affordable housing. Areas presently used by backcountry recreation will be forever lost.

Again, thank you for the opportunity to comment on the Mission Ridge expansion proposal. I support local businesses and efforts aimed at improving recreation and tourism, but not when it comes at the expense of the resources, ways of life, and physical safety of the community, and not when proposed actions fail to align with planning efforts and community initiatives aimed at guiding sustainable development and wise stewardship of the region's natural resources. I do not support the proposal as presently submitted.

Best,

Cody Gillin

621 Lowe Street

Wenatchee WA 98801

From: [Cody Gillin](#)
To: [RJ Lott](#)
Subject: Mission Ridge Expansion Master Planned Resort comment
Date: Thursday, March 26, 2020 11:03:17 PM

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Dear Mr. Lott,

Thank you for the opportunity comment on the proposed Mission Ridge expansion. I understand Chelan County Community Development takes seriously its responsibility to review proposed developments and consider the perspectives/findings of interested members of the public. After reviewing the proposal narrative, appendices, and other pertinent documents, I identified deficiencies in the proposal documents as well as misalignment between proposal information pertaining to growth and resource management in Chelan County and Washington State. Here is a summary of my review and conclusions:

1. Affordable Housing: The expansion proposal forecasts no problems with resort employees securing affordable housing either in dedicated workforce housing at the new village complex or elsewhere in the Wenatchee Valley. This runs contradictory to the Our Valley Our Future initiative's recent report on affordable housing in the Wenatchee Valley and surrounding areas. The OVOF housing report identified a direct link between a lack of affordable housing with an inability of major employers to fill vacancies as well as families double-occupying dwelling units. The report goes on to list many factors that contribute to a growing lack of affordable housing, all of which are out of the purview of the expansion proposal. In communities with large ski resorts and live-in villages, the gap in housing affordability is actually wider than other nearby locations (this is a well-documented problem that results from the housing stocks being converted to vacation homes and short-term rentals that either sit vacant most of the year or are unavailable for a low-wage workforce that operates and maintain a ski area, village, and on-site services). The expansion proposal housing report appears to not have considered any of the information or documentation on this problem. Since Chelan County is a sponsor and board member of the OVOF initiative, it should ensure that new developments in the region align with the recommendations emerging from the OVOF process, including making strides to improve (not exacerbate the existing deficiency of) affordable housing.
2. Wildfire, Fire-Flow, and Ingress-Egress: The proposed expansion would place hundreds of structures and thousands of people into a high-risk wildfire area where fire is a healthy, necessary component of a functioning ecosystem. As presently proposed, the expansion is requesting downward modifications to existing Chelan County code for fire flow/fire protection (15.40.040). Ingress and egress would be available on only a single road constructed on a steep slope with the village located upslope. A community with a population the size of Cashmere situated upslope of a sure-to-burn-forest with only one way out and inadequate fire flow protection poses grave threat to public safety. No municipal water supply is presently available to support fireflows.
3. Water Availability: At present, winter and summer streamflows in Squilchuck Creek are allocated and during low-flow periods are overallocated. The Stemilt-Squilchuck Watershed Plan identifies several reasons to be extremely cautious with the proposed new development, and only one indecisive result which could support new development in that "a portion of winter and spring runoff, return flow from irrigation and base flow may be available for diversion to new or additional storage" (there is no irrigation return flow that high in the basin so all water needed for the expansion would come from base flow). The proposed expansion appears to require an undefined rate/quantity of additional water for domestic and snowmaking purposes that would be supplied by drilling deep wells into the

upper Squilchuck Basin aquifer. The Hydrology Memo is vague and hesitant in its conclusions that “the availability of future water needs *may* be present in deep bedrock fractures in the vicinity of the proposed Mission Ridge Expansion project” and “the *potential* availability of groundwater for domestic and snow making uses *may* be available from deep bedrock fractures at the site”. The Hydrology Memo indicates that the deep bedrock fractures where drilling is recommended “appear to be in hydraulic continuity with the surface waters near the ski area where current water right diversions are being utilized”. If surface water flows are at best fully allocated (as indicated in the Stemilt-Squilchuck Watershed Plan) and the proposed groundwater supply is in connectivity with surface water then new withdrawals from the aquifer could steal water from existing water right holders. No municipal water supply is presently available to support domestic and/or snowmaking purposes.

4. Urban Growth and Community Vision: RCW 36.70A.110 requires counties to “designate an urban growth area or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature.” The proposed expansion adds 4000 pillows (analogous to the population of Cashmere), which is urban growth in nature and seems to be in violation the intent of Washington urban growth law. Furthermore, the expansion proposal does not seem to align with the Stemilt-Squilchuck Community Vision (in which Chelan County was a lead partner) which found that the upper Squilchuck Basin cannot support urban-level development (an expansion to include hundreds of condominiums, restaurants, lodges, transportation, and other services to support 4000 overnight residents and many thousands more day users is unmistakably urban).

5. Community Cost-Benefit Comments/Observations: The proposed development, if realized, would offer some benefits to recreation and the economy. There could be new opportunities for hikers, mountain bikers, trail runners, and Nordic skiers. Additional terrain will be opened for downhill skiing. An expanded resort will provide jobs and visitors will patronize local businesses. But there also appears to be great risk of many deleterious, irreversible impacts. Water supplies will be compromised in an already thirsty region. Wildlife habitat will be reduced in an already fragmented area. Traffic is projected to increase over five-fold and greatly reduce the current level of service in the travel route. Wildfire risk will increase and pose threats to a community that is already struggling to cope with increased frequency, magnitude, and intensity of fire. Wildfire protection, as proposed, is lacking. The way of life for the rural Squilchuck community already pressured by development and increased recreation will be irreversibly altered. A greater strain will be placed on already deficient affordable housing. Areas presently used by backcountry recreation will be forever lost.

Again, thank you for the opportunity to comment on the Mission Ridge expansion proposal. I support local businesses and efforts aimed at improving recreation and tourism, but not when it comes at the expense of the resources, ways of life, and physical safety of the community, and not when proposed actions fail to align with planning efforts and community initiatives aimed at guiding sustainable development and wise stewardship of the region's natural resources. I do not support the proposal as presently submitted.

Best,

Cody Gillin

621 Lowe Street

Wenatchee WA 98801

From: [Gustav Bekker](#)
To: [RJ Lott](#); [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#); [Mike Kaputa](#)
Subject: Mission Ridge Expansion project
Date: Friday, March 27, 2020 1:11:11 PM
Attachments: [El Sendero WWA letter to Chelan County 2020-03-27.pdf](#)

External Email Warning! This email originated from outside of Chelan County.

Dear Mr. Lott,

We appreciate the opportunity to provide these public comments on the Mission Ridge Expansion Project in Chelan County, Washington.

Comment letter attached.

Gus Bekker
President
El Sendero Backcountry Ski and Snowshoe Club
PO Box 5622
Wenatchee, WA 98807

Hilary Eisen
Policy Director
Winter Wildlands Alliance
PO Box 631
Bozeman, MT 59771

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From: [Gustav Bekker](#)
To: [RJ Lott](#); [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#); [Mike Kaputa](#)
Subject: Mission Ridge Expansion project
Date: Friday, March 27, 2020 1:11:11 PM
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Dear Mr. Lott,

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Comment letter attached.

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President
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PO Box 5622
Wenatchee, WA 98807

Hilary Eisen
Policy Director
Winter Wildlands Alliance
PO Box 631
Bozeman, MT 59771

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From: [Colleen Ryan](#)
To: [RJ Lott](#)
Subject: Mission Ridge Expansion
Date: Sunday, March 29, 2020 8:01:42 PM

External Email Warning! This email originated from outside of Chelan County.

Dear RJ Lott,

I am writing to oppose the proposed Mission Ridge expansion. There are several reasons I originally felt this was a flawed and one-sided proposal and the more I learn about it, the more strongly I feel that this is a very bad idea for more reasons than I originally realized. I hope the community's voice is heard as I speak for many in saying this proposal appears to benefit one person(s) and unfortunately negatively impacts the rest of us: our community and land.

Before discussing issues involving the environment, community/local economy, and the bending/breaking of rules and policies, I would like to share a personal viewpoint. In watching the video on YouTube titled "Mission Ridge Expansion" it is glaringly obvious that the opposite effect to what is suggested will take place. Let me explain. The message sent out is that we love our valley; Mission Ridge being one of our community gems. It is discussed in the video how Mission Ridge helps recruit (and dare I say retain) health care providers. I am a health care provider that moved here five years ago, partially for Mission Ridge, as it is; a small community ski hill with, to put it bluntly, mediocre snow fall and terrain that makes up for those shortcomings with a community vibe without overcrowding. With development of the proposed village, those perks would no longer exist. I enjoy using my Mission Ridge pass, accessing the trails and backcountry terrain year round and this expansion would change that forever. All the things that they are listing in the video as pros about living here would be deeply and negatively impacted by this expansion. In fact, it would have a negative impact on recruitment and retention of health care providers that prioritize positive outdoor experiences.

There are several environmental concerns that I am sure you are already aware of and should be taken seriously. Some of those concerns include the increase of fire risk with increased population and the potentially fatal dangers of residents and firefighters with the one road in and out. Also water is a major concern. It is brought to my attention that the aquifer does not have the water needed to support current water right holder demands year round, much less the proposed 4000 pillow community. Would Mission have to make more snow to get to and from the village on the proposed new chair lift(s)? The Stemilt Partnership's report included that the upper watershed cannot support urban-level development, yet there is a proposed village with as many beds as our neighboring town of Cashmere- how does this make sense? The concerns with the septic system is real; are drain fields really a viable option for this large of community? And if the water quality fails testing due to this, the local orchardists are the ones impacted if their fruit cannot be picked. There are also obvious concerns with local flora and fauna: including but not limited to the whitebark pine, the northern speed owl and the Colockum elk herd migration.

Thank you to the County for establishing and leading in the Stemilt Partnership. Please hold strong to the values and goals of that partnership. Also this plan violates Washington's

law on Urban Growth Areas.

This proposal would take away from the local economy in several ways. For example, my friends came to ski Mission three weeks ago. They stayed in a local hotel, shopped in local shops and ate in local restaurants. Never once was it mentioned that the mountain was too far to go to town for a meal, being an easy 20 minute drive. This proposal is not good for the local economy. If second home owners or overnight guests are staying and eating at the mountain, that money is not being spent in and around our local community. That money goes into the developer/owner's pocket. That someone is not a local.

Mission is a small ski hill with decent snow. This expansion does not add skiable terrain beyond some mentioned beginner level. It would make the current terrain crowded. This proposal negatively impacts our community gem of a ski hill, the environment, the local culture/economy and breaks policies and partnerships. Please listen to the community when we say: We DO NOT want this expansion.

Thank you for your time.

Sincerely,

Dr. Colleen Ryan

From: pqwilliams23@nwi.net
To: RJ.Lott@chelancounty.org
Subject: Mission Ridge expansion
Date: Tuesday, March 24, 2020 11:05:55 AM

External Email Warning! This email originated from outside of Chelan County.

Dear Mr. Lott,

I am writing to ask you to deny the approval of the current Mission Ridge Expansion Plan based on conditions around wildfire risk, uncertainty of water availability within the Squilchuck Basin, as well as violation of Urban Growth RCW 36.70A.110. Since the data presented by the developer is minimal at best, I urge Chelan County to seek consultation from a qualified, independent hydrologist and a wildland fire risk manager who can evaluate the technical reports submitted by the developer, and to determine future potential liabilities the development that will fall on the county to fund. Chelan County needs to incorporate climate-change forecasts for eastside Cascade Mountains the next 50 years, developed by the University of Washington and available through the Climate Impacts Group <https://cig.uw.edu/>.

The County should deny the request for exceptions contained in the fire protection plan. In fact, the fire marshal should increase fire-flow requirements for this high-risk development placed in a fuel-rich dry forest. The required fire flow is not impractical if the water supply comes from the PUD. However, the PUD has indicated in their October 18, 2018 Agency Comment letter on MPR 2018-128 that:

âEURoeIn summary, water service is considered not available at this time until determined permissible and feasible. Significant water system infrastructure will be required and the design, permitting, planning and construction of such infrastructure is a multiyear effort.âEUR

This suggests that municipal water will not be immediately available.

Until the water issue is resolved, the plan should not be approved.

Modification to international fire code 104.8 is allowed only when the modification does not lessen life and fire safety requirements. Having a 4,000-pillow community trapped by an engulfed access road during an emerging catastrophic fire is a grave threat to fire safety and to life.

The road, as currently planned, upslope of a 30% (+) sidehill is unsuitable as a stand alone egress route. The proposal should be reviewed with a life-safety bias for the public, not a financial bias benefiting a private developer and other businesses seeing opportunities within the project. To approve the single access layout of this project is irresponsible on the CountyâEUR(tm)s part.

Violation of Urban Growth Area RCW 36.70A.110 This RCW states that counties âEURoe....shall designate an urban growth area or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature. âEURoe The Mission Ridge area was not designated an Urban Growth Area by Chelan County. The Washington Legislature enacted this law because they âEURoefound that uncoordinated and unplanned growth posed a threat to the environment, sustainable economic development and quality of life in Washington.âEUR The Mission Ridge Development would add 4000 pillows making it a community the size of Cashmere. Clearly the development is in violation of this law and its intent.

In addition we are very concerned about the effects that this development will have on traffic, wildlife, overcrowding and overuse of natural resources. We ask that the developer resubmit a plan that is within the RCWâEUR(tm)s, Fire Codes, and be less destructive to the environment and quality of recreational opportunities.

Thank you for the opportunity to comment.

Sincerely,

Include your name and address

Patricia L. Quinn-Williams

2448 N. Ashland

East Wenatchee, Wa 98802

From: [Squilchuck Miller Water Users](#)
To: [RJ Lott](#)
Cc: [Mike Kaputa](#); mark.schuppe@ecy.wa.gov; [Gordon Zimmerman](#); [Norm Gutzwiler](#); [Terry Fitzpatrick](#); [Tony Eastman](#)
Subject: Mission Ridge Expansion
Date: Monday, March 23, 2020 12:12:33 PM
Attachments: [MRF-County Letter.pdf](#)

External Email Warning! This email originated from outside of Chelan County.

Hello,

Please find attached our comments regarding the Mission Ridge Expansion.

Please confirm receipt,

Thank You,

Tanya Reece

Beehive Squilchuck Miller Water Users
4593 Squilchuck Rd
Wenatchee, WA 98801
(509)662-6675
beewater@nwi.net

From: [Paul Ballinger](#)
To: [RJ Lott](#)
Subject: Mission Ridge Expansion
Date: Friday, March 27, 2020 1:58:03 PM

External Email Warning! This email originated from outside of Chelan County.

Paul Ballinger
2009 Skyline Drive
Wenatchee, WA. 98801
March 27, 2020

R. J. Lott, Planning Manager
Chelan County Community Development
316 Washington St. Ste 301
Wenatchee, WA. 98801

Dear Mr. Lott,

I am writing to present arguments against the approval of the Mission Ridge Expansion Plan, based on conditions around wildfire risk and lack of water availability within the Squilchuck Basin. At a minimum, I urge Chelan County to seek consultation from a hydrologist and a wildland fire risk manager who can evaluate the technical reports submitted by the developer, and to determine future potential liabilities the development that will fall on the county to fund. Chelan County needs to incorporate climate-change forecasts for eastside Cascade Mountains the next 50 years, developed by the University of Washington and available through the Climate Impacts Group <https://cig.uw.edu/>

ISSUES AROUND WILDFIRE RISK: I am using text prepared by the AEGIS Engineering, PLLC for the client and written in the Fire Protection Plan (April 18, 2018; revised Dec. 7, 2019):

AEGIS Engineering describes this as a location is not suitable for urban development.
Page 5: *Fire Hazards: The Isolated location of the Mission Ridge site present inherent challenges with regard to access for emergency responders in event of an emergency. The topography around the subject development area ranges from about 25%-100% slopes, contributing to the extreme conditions present at the site. A compounding factor is the extreme seasonal climatic conditions, which contribute to snow accumulation during the winter months and potential wildfires in the summer. Primary fire hazards contemplated involve structures and vehicles within the development, as well as wildland fires approaching from outside the site.*

AEGIS Engineering completed the International Wildland-urban Interface Code Fire Hazard

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

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

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

ISSUES AROUND WATER AVAILABILITY: The next argument against the approval of the Mission Ridge Expansion Plan, focuses on the inadequacies of the current understanding of the Squilchuck Basin’s Hydrology. The text prepared by WNR Group for the client supports my claims. Below are excerpts from the Hydrology Memorandums (March 26, 2018 Hydrology Review Memorandum; and the Memorandum of Dec. 31, 2019).

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

of future water needs may be present in deep bedrock fractures in the vicinity of the proposed Mission Ridge.

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

The WNR Group does not take into account that homeowners will be year-round users of their properties, with high residential water use year-round. Chelan County is experiencing growth and home purchases by Seattle area residents who move to our region for more affordable housing. Wenatchee and the Pacific Northwest are where climate refugees are moving and the current wave of retirees are the tip of the iceberg.

(Source: Ciff Mass Weather Blog <https://cliffmass.blogspot.com/2014/07/will-pacific-northwest-be-climate.html>

This incoming population will be the primary purchasers of residences in the development. WNR Group falsely assumes peak residence occupancy will only be during ski season, as it states, *“Availability of water is typically found during winter and spring seasons. If the proposed development occurs, the majority of use will occur during these seasons when water is available. Potable groundwater for in house use at the site will be in highest demand during the winter months, not during the low flow time period of the hydrologic cycle.”* This has no evidence, just a hope and a prayer.

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

The WNR Group does not address the forecasted climate change for east-side Cascades, shifting precipitation to rain (instead of snow), resulting in surface run-off highest in late fall through winter. WNR Group asserts that *The development of a snow pack on the ski slopes near the development is a non-consumptive use, and will also effectively help stream flows during the spring and summer months by allowing more recharge to the surface waters during the spring melt.*

Thank you for facilitating this important public process.

Sincerely,
Paul Ballilnger, MD
Resident of Chelan County since 1993

From: crader@nwi.net
To: RJ.Lott@chelancounty.org
Cc: Kevin.Overbay@chelancounty.org; Bob.Bugert@chelancounty.org; Doug.England@chelancounty.org
Subject: Mission Ridge proposal
Date: Friday, March 27, 2020 11:23:15 AM

External Email Warning! This email originated from outside of Chelan County.

I am against the proposed Mission Ridge development project in its current form. I do want to see the ski area expanded – more skiable terrain, maybe a small area for overnight housing and a related business or two – but this proposal is too big. I think it puts too much pressure on the aquifer and on wildlife (especially elk) living in this area. With only one way in and out, the development would just put more people in danger if there should ever be a wildfire there. The project would consume much land and bring too many people to a site that now provides quiet, non-motorized, year-round recreational opportunities. Please do not approve this project.

Thank you,
Christine Rader
1700 Rainier Street, Wenatchee
509-888-0181

From: [Carin Smith](#)
To: [RJ Lott](#); [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#); comments-pacificnorthwest-wenatchee-wrrd@fs.fed.us
Subject: Mission Ridge proposed expansion comments
Date: Wednesday, March 25, 2020 11:53:27 AM

External Email Warning! This email originated from outside of Chelan County.

With regard to the proposed development at Mission Ridge:

I am an avid skier and support the current state of the Mission Ridge Ski Area as a great recreation resource for our valley. However, I have deep concerns about the proposed development.

1. Access and fire danger. Please study what happened in the wildfire in Paradise, California. See the Los Angeles Times article : "Must Reads: Here's how Paradise ignored warnings and became a deathtrap" It states, "It was doomed by ... dead-end roads that paid no heed to escape." What plans does the developer have to create additional access? With Squilchuck road being the only access, think about how our community will respond after something like this happens here. How will hearing "I told you so" will help those who lose their homes or even die? Yes, this development has fewer homes than did Paradise. How many are you willing to risk? The development plan only addresses fire mitigation (eg thinning, fireproof materials), but nothing about fire evacuation.
 - a. See <https://www.latimes.com/local/california/la-me-camp-fire-deathtrap-20181230-story.html>
2. Water. Please talk with independent experts about the water table, amounts of water potentially available, impact on the aquifer, and water needs both for homes and fire fighting. Do not rely on the developer's information. It appears that the watershed cannot support the additional housing. See the details in number 4 on this page: https://docs.google.com/document/d/e/2PACX-1vQ09NMHTko1aalJmwEEoVah-xCJBhsjFhlOaG2Mr8Nm9jNA1haxD4oPbfiQai_mQW3Sb0R3iF448zW/pub#h.87gigvo0rf5v
3. Traffic. Where will the traffic go after it hits the three intersections that are discussed in the proposal? It will not just disappear. What about the Sellar bridge? Wenatchee Avenue? Also, the proposal states that since the full development won't happen until 2040, that the traffic impacts be "re-evaluated at a future date." What then--if the impacts are deemed to be unacceptable, do they un-construct what is already built? Absurd.

In summary, although I am an avid skier and do want to support our local ski area, I strongly feel this is not the way to do so. Maybe we first need a road from the top of Mission Ridge down to Ellensburg? That could address the fire evacuation and traffic issues... but there is still the water.

Sincerely,

Carin Smith

From: [Ronald](#)
To: [RJ Lott](#)
Subject: Mission Ridge, MPR 2018-128
Date: Monday, March 16, 2020 12:24:35 PM
Attachments: [Mission Ridge Development - 2020.docx](#)

External Email Warning! This email originated from outside of Chelan County.

Attached are our comments about the proposed Mission Ridge expansion.

Thanks,
Ronald Balzer
509-886-3562

From: [Dean O'Daffer](#)
To: [RJ Lott](#)
Subject: MPR 2018-128
Date: Tuesday, March 10, 2020 5:49:56 PM

External Email Warning! This email originated from outside of Chelan County.

I am writing this letter as public comment in regards to the proposed Mission Ridge Resort Development Expansion. I say Expansion as a loose term because the proposed resort is many times larger than the present resort. Now there is a Lodge and a few other buildings, there will be 900 + buildings. This expansion seems way out of proportion to the present situation. Is this reasonable? If you are an investor, maybe so, if you are a present county resident who uses this area or if you are part of the ecology of this area now, maybe not so.

This new Mega Vision for Mission Ridge is about building and selling Real Estate. This will be a problem for the surrounding natural areas. The Lake Clara and Stemilt Basin areas will be heavily used by recreationalists; hiking, biking, motorcycling, and 4 wheeling. The animals will be pushed out, the air quality diminished and the silences become naught. This Proposed village will eventually cause demand for more skiing terrain, putting more pressure on the surrounding natural areas

It is also ironic that the Resort will provide services to its residences, when Climate Change transitioning seeks to centralize services away from the suburbs. Wenatchee has all the services that visitors need. The proposed Clock Tower in the Plaza is taken directly from the Vail Colorado playbook, with its nearby businesses and condominiums. Chelan County has Leavenworth and Chelan, both are heavily invested in the tourist industry. Are these cities going to have to compete with the Resort? More tourism may not be in the best interest for our Chelan County, why put all our eggs in one basket?

The hydrology reports seems a bit vague. Yes there are existing water rights, yes there is surface water and yes there is deep well water. But how much is needed and how much is available? How will this affect the Squilchuk growers and also how will it affect the Stemilt growers because the deep wells most likely will be drawing from water tables that are common to both drainages. Have these questions have been answered?

This entire area is prone to landslides and slumps. In the last few years, this geology weakness has been seen in the Ski area, Beehive road and the Heights area. Building a road through this steep and heavily forested terrain seems risky. If there is a Wildfire in this area, the slides will become more of a risk. When the road slides, who will be responsible for fixing it and for the trapped residents. Under no circumstances should Chelan County put itself in this position.

Just a short note on the employee housing. This housing will most likely not be for local residents, but will be for foreign workers. That is the model being used in some Colorado resort areas.

Dean O'Daffer

1509 3rd Street

Wenatchee, Wa.

From: [Erin Andrade](#)
To: [RJ Lott](#)
Subject: MR Expansion
Date: Sunday, March 29, 2020 6:27:56 PM
Attachments: [Erin Andrade MR Expansion Comments.docx](#)

External Email Warning! This email originated from outside of Chelan County.

RJ Lott,

I reviewed the El Sendero meeting summary, detailing some of the greatest concerns noted with the current proposed project.

I included, in red in the attached document, the things I most agree with, namely:

- *The concern of creating an overcrowded recreation area*
- *The significant negative impact on traffic*
 - o *Specifically, although there is more parking; there is not a new road built to accommodate the extra vehicles that would be getting to the new facilities*
 - o *The housing development is too large for the current infrastructure*
 - o *The impact on the local residents and users will be significant, creating a negative experience, similar to that at Stevens Pass or Snoqualmie Pass*
- *This proposal violates the Stemilt Partnership Mission, by potentially impacting our wildlife as well as our recreational experiences by having an urban development so close to that area*
- *I also agree with the other concerns regarding potential fire hazards*
- *I also agree with the concerns detailed below regarding water use*

I reviewed promotional videos and the project proposal for the expansion.

I agree with the following comments:

- The expansion will increase beginner terrain
- The expansion will increase parking

- The expansion will add other activities such as cross country skiing, which I could see myself enjoying

I disagree with the following comments:

- “Maintain the values of stewardship, community, and small mountain vibe – aka the MR way of life... keep our soul intact while growing. Keep our roots and our ties to the community”

I watched the promotional video for MR, with Dr. Freed, Mayor Frank Kuntz, and Shiloh Burgess. I moved here about 4 years ago from Seattle (transplanted from Indiana), so I am not a true local. I am a physician at Confluence Health and I was attracted to Wenatchee because of the ease of outdoor access, including Mission Ridge. On the same side of the coin, in Seattle I was already living close to 3 ski resorts – Crystal Mountain, Stevens Pass, and Snoqualmie Pass. Why would I move to Wenatchee when I had access to these larger mountains? The answer is that I wanted to get away from the crowds, traffic, and overcrowding of Seattle. Even after moving to Wenatchee, I still owned season passes to both MR and SP, but ultimately, after the overcrowding became too much at SP; my husband and I only own MR passes now. MR is special because it is a community asset. It is a local ski hill. Creating condominiums and housing up there is not needed because:

- Most locals already live <30 minutes from the hill
- The downtown area is already expanding with a number of new hotels
- The city itself is expanding with more homes being built throughout the valley as Wenatchee is expanding

If we are truly doing this project to benefit the community, unfortunately I see us losing our “local ski hill” vibe. We will become another touristy, overcrowded resort with traffic issues. The ability of the residents of Wenatchee to escape to the trails and find solitude will be permanently impacted. We will lose our small mountain vibe.

As we continue to attract physicians and other professionals to the area, how can we continue to distinguish ourselves as having a local ski hill with solitude when we are no longer the local ski hill, but rather a resort?

I do understand the positive financial impact of this expansion, but there are more sustainable options to positively impact our community than an apparent economic boost that is accompanied by the loss of our small mountain feel, with the current project proposal. If the housing structures of the project expansion were significantly downsized, thus reducing the demand on the area with too many users, I would be in greater agreement with this project.

I greatly appreciate your consideration of the potential impact of this project.

Sincerely,

Erin Andrade

From: [Adam Vognild](#)
To: [RJ Lott](#)
Subject: Opposition to the Mission Ridge Expansion project.
Date: Monday, March 30, 2020 6:02:55 PM

External Email Warning! This email originated from outside of Chelan County.

My name is Adam Vognild, I grew up in Wenatchee and have lived here most of my life. I'm opposing the Mission Ridge expansion project.

In the letter from Eugene N.J. St. Godard from the WNR Group dated December 31, 2019 he states the following conclusions and recommendations:

"The preliminary hydrogeologic investigation at the site has determined that the availability of future water needs may be present in deep bedrock fractures in the vicinity of the proposed Mission Ridge Expansion project as defined by EMS and VLF geophysical surveys. These fractures appear to be in some degree of hydraulic continuity with surface water in the Squilchuck Creek drainage. Several water rights are currently used at the Mission Ridge ski area for indoor use and snow making activities. Although these approved diversions are located within the lower drainage area, it appears that the deep bedrock aquifers may be the source for the intermittent creeks, and as such can be inferred to be within the same hydrologic water budget.

Proposed water use at the expansion project will primarily occur during winter and spring months when water is most available. Proposed snow making, a non consumptive use, will also be a benefit to creek flows in spring and summer months, by allowing additional snow pack melt to the creeks.

In summary, it is our opinion, that the potential availability of groundwater for domestic and snow making uses may be available from deep bedrock fractures at the site. These deep bedrock fractures appear to be in hydraulic continuity with the surface waters near the ski area where current water right diversions are being utilized."

I'd like to point out that the conclusion states "Proposed water use at the expansion project will primarily occur during winter and spring months when water is most available." Currently this project is slated to be a year around resort with up to 4000 people living there. This conclusion is in opposition the current expansion plan and needs to be evaluated to make sure that there is enough water for fire suppression, drinking water for 4000 people year around as well as snow making in the fall and winter.

The estimated five- to seven-fold increase in traffic on the Squilchuck Road will have a negative impact on people living on Squilchuck road and the south end of Wenatchee. This increase in traffic will not effect the developer at the end of the road. But does it consider

what it will do to locals who live in the area and have recreated in this corridor for decades? It seems irresponsible to allow this much of an increase in traffic given that the road can not be modified without a sizeable cost to Chelan County citizens.

It seems inconceivable for a project of this magnitude, that a septic system(s) for 4000 people placed in the soil and rock type of this expansion could be successful without impacting the existing downstream users of this watershed. Further analysis needs to be completed to guarantee no negative impact to all the people and orchards that this would affect if it failed.

Sincerely,

Adam Vognild

From: wedeters@nwi.net
To: RJ.Lott@chelancounty.org
Cc: Bob.Bugert@chelancounty.org; Doug.England@chelancounty.org; Kevin.Overbay@chelancounty.org
Subject: Proposed Mission Ridge Expansion Comments
Date: Monday, March 23, 2020 4:39:27 PM

External Email Warning! This email originated from outside of Chelan County.

RJ Lott, Planning Manager
Community Development Department
316 Washington St., Suite 301
Wenatchee, WA 98801

Re: Proposed Mission Ridge Expansion

Dear Mr. Lott,

I would like to comment regarding the proposed Mission Ridge Expansion Project.

The proposal has two major themes. One is ski area expansion. The other is a private, year-round real estate development roughly ten times the size of the nearby Forest Ridge community.

Below are several specific issues of particular concern:

The proposal violates the Stemilt Partnership Mission. Chelan County is the lead organization responsible for establishing the Partnership. The Partnership was formed in 2007 in response to concern over privatization and development of 2,500 acres of DNR forested land in the Stemilt Basin. In 2012 the County purchased 2,500 acres in order to prevent development in the forest. The Stemilt Partnership continues to meet to discuss management of the Stemilt-Squilchuck Community Forest. The mission of the Partnership is to protect water resources, conserve critical habitat for fish and wildlife, and maintain recreational access to public lands. The proposed development goes against the founding rationale of the Partnership and violates all three of its central goals by stealing from the water budget in the upper watershed; placing an urban environment in the forest which disrupts wildlife; and degrading existing recreational experiences by overpopulating all of the lands surrounding the development with too many visitors. How can the County even consider allowing the type of development that the Stemilt Partnership was formed to prevent?

Water resources: The Chelan County WRIA 40A Watershed Plan for the basin states, “Annual water rights are about 50 percent greater than the estimated quantity of physically available water. Water diverted for new storage may potentially impair senior rights and/or require mitigation of impacts to senior rights”. The proposal assumes water will be available to operate and protect from wildfire the proposed 4000 pillow community, yet senior water rights held by downstream irrigating orchardists and others in the basin could result in no water availability for those purposes during wildfire season. The entire wintertime flow of Squilchuck Creek is allocated by existing water rights, while both Beehive Irrigation District

(senior water right) and Mission Ridge (junior water right) compete to fill their respective reservoirs. Existing water rights in Spring and Summer exceed the available flow in the creek, with some water users having their water rights regularly cut when the stream flow is inadequate to cover all existing water rights. The development proposes to drill wells and pump water from the deep aquifers which are hydraulically connected to the surface waters of the Squilchuck drainage. There is no available water to be removed from the aquifer, because any water that the development removes directly affects current water right holders who already consume the entire stream flow. One of the critical findings of the Stemilt – Squilchuck Community Vision is that the upper watershed cannot support Urban-level development, yet that is what has been proposed. The Hydrology Memorandums in the proposal, prepared by WNR Group, ignore these facts. They state “The preliminary hydrologic investigation at the site has determined that the availability of future water needs may (emphasis added) be present in deep bedrock fractures,” and “These deep bedrock fractures appear to be in hydraulic continuity with the surface waters near the ski area where current water right diversions are being utilized”. WNR Group assumes peak water usage will be during the ski season, yet the real estate development portions of the proposal are clearly year-round. WNR Group points to snowpack, but does not address forecasted climate change for east-side Cascades, and changes from snow to rain. It does not appear the basin can support existing water needs, let alone a small city. At the very least, the County needs to hire a Hydrologist to properly evaluate these uncertainties.

An alternative to taking water from the aquifer might be to construct a municipal system that pumps water from town. Water is currently supplied by the Chelan County PUD to Forest Ridge. However, the PUD has indicated in their October 18, 2018 Agency Comment letter on MPR 2018-128 that: “In summary, water service is considered not available at this time until determined permissible and feasible. Significant water system infrastructure will be required and the design, permitting, planning and construction of such infrastructure is a multiyear effort.” Until the water issue is resolved, the plan should not be approved.

Sewer Issues: Related to water resources, the proposal indicates that wastewater will be disposed of through dispersed on-site systems which deposit wastewater into the ground through drainfields. It seems likely that a municipality of this size (e.g., Cashmere has roughly the same population as the proposed development) would instead construct a wastewater treatment plant. How will these drainfields affect downstream users? Orchardists in the Squilchuck drainage irrigate with surface water from Squilchuck Creek. The water is tested on a regular basis during growing season for compliance with legislated food safety standards. If the surface water fails the quality tests, fruit cannot be picked. Who will bear financial responsibility if a 4000 bed community pollutes the Squilchuck drainage and jeopardizes the livelihood of current water rights holders?

Wildfire Risk and Habitat loss: In the Mission Ridge proposed Fire Protection Plan, AEGIS Engineering, PLLC (hired by the developers) states “The isolated location of the Mission Ridge site present inherent challenges with regard to access for emergency responders in the 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.”

Yet the same plan argues for exceptions from code-required fire flows, and cites County code 15.40.040 allowing downward modification of fire flow where full fire-flow requirements are impractical. The county code also contains a provision allowing the fire flow to be modified upward where conditions indicate an unusual susceptibility to group fires of conflagrations, as we have here. AEGIS Engineering completed the International Wildland – Urban Interface Code Fire Hazard Worksheet and the project scored as “high hazard”. The Subdivision Design scored at the highest levels for having a one – way road in/out, for having a dead – end road greater than 200 feet, and for portions of road grade exceeding 5%. The Vegetation Score was maximum for heavy fuel types, and for Defensible Space at less than 30%. If the development is allowed, homeowner insurance providers may choose not to offer coverage due to facts in this Fire Protection Plan.

RCW 36.70A.110 states that counties “....shall designate an urban growth area or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature.” The Mission Ridge area was not designated an Urban Growth Area by Chelan County. The Washington Legislature enacted this law because they “found that uncoordinated and unplanned growth posed a threat to the environment, sustainable economic development and quality of life in Washington.”

Clearly the development is in violation of this law and its intent.

The Traffic Study appended to the application indicates 9,468 average daily trips and 833 evening peak-hour trips will be generated by the resort. Table 7 of the report estimates 1,050 passenger cars per hour in the southbound direction and 930 passenger cars in the northbound direction, reducing the level-of-service (a quantitative measure describing traffic operational conditions and their perceptions by drivers) from LOS A (free flow) and B (stable flow), as the existing condition, to LOS D (high density and driver experiences a generally poor level of comfort and convenience) as the future condition. Compare this to the existing volumes listed in the table of 145 southbound cars and 177 northbound cars. This is a five- to seven-fold increase in traffic on the Squilchuck Road. The study argues that LOS D meets Chelan County Standard, but does it fairly consider the lifestyles of other residents bordering the Squilchuck Road? Does it meet our expectations as citizens of the Wenatchee Valley? This increase in traffic serves to enrich the developer, but it does so by degrading the lifestyles of current residents and undermining the recreational experiences of the entire community. Further, the adverse impact to wildlife in and around the proposed development and adjacent lands is significant.

Humans cause the majority of wildfires, and a development of this sort, which has people living and playing in wildfire-prone forests year – round, will increase the likelihood that wildfires will be ignited. Such fires will threaten not just this development but the much larger community down valley, and the wildlife throughout. This project must not be exempted from upholding the very strictest codes for fire protection, fire safety, and evacuation.

Thank You for the opportunity to comment.

William E. (Bill) Deters

2777 Number 1 Canyon Road

Wenatchee, WA 98801

509-423-4-5971

wedeters@nwi.net

From: [dave](#)
To: [RJ Lott](#); [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#)
Subject: Proposed Mission Ridge expansion
Date: Monday, March 30, 2020 3:38:54 PM

External Email Warning! This email originated from outside of Chelan County.

To Planning Manager and Commissioners of Chelan County,

I would like to comment on the proposed development by Mission Ridge. I believe the the permit should be denied. There are too many negative issues in my opinion and the request lacks important information regarding water, sewer and access. My objections are as follows:

- Water: Information provided is incomplete. There is no estimate of quantities needed. This should include all use including domestic and snow making. The large amounts of water required would take away from current users. The Squilchuck basin, Stemilt basin and springs on the Kittitas county are all connected in underground aquifers, and all will be impacted by the water usage of thousands of people. the hydrology report based conclusions on seasonal use, but the homes and businesses are intended for year round use. Springs like the two that feed the streams running across the proposed access road will likely be depleted, reducing flows to already stressed Squilchuck Creek.
- Sewer: Current plans essentially relies on septic systems. That can't possibly be adequate for a development that could be close in size to Cashmere. Any permit should include proper sewage treatment compared to a municipality of that size. The project is right or the line between Squilchuck and Stemilt drainages. Possible contaminants could threaten water for homes and orchards through a large area.
- Access road: The proposed access road crosses very steep terrain. the ground consists of broken rock and boulder in loose dirt. Similar road cuts on the road up to Mission Ridge are tapered up to 100 feet above the road and contain boulders that frequently land on the road. The steep hillside is not stable enough to be the lone access for so many people. Landslides and slumps are common in the Squilchuck and Stemilt basins. Just above the Mission Ridge lodge, two large slides have come off the run called Castle in the last few years.
- Traffic on Squilchuck Road: Traffic volume on Squilchuck Road will be increased about six times. This is a huge increase. The current road above Squilchuck State Park is hardly suitable for a population center of the size

proposed. There are times in the winter when I have been unable to drive up the road or have had to install chains. Cars sliding off the road in the winter are common. During the busy days of ski season, people park all along the road and ride buses up. This creates congestion and stoppages that will impact uphill and downhill traffic flow. Boulders can come down from the last mile or so of the road year round, especially when the soil is wet. Even with a fairly recent upgrade on the road there are problems with potholes and up-heaving asphalt. Additional traffic can only worsen the problems.

- Fire and fire access: Being surrounded by forest, the whole development is at risk. From the top of Mission Ridge, the basin looking west burned recently. A catastrophe many times worse than Broadview can easily be envisioned. Having one access, that could be subject to fires for the 12 miles all the way to town, is irresponsible.
- Urban growth: It appears to me the proposed development would be urban growth, well outside current boundaries. I would expect a long legal process if permits are issued.
- The proposed development agreement contains language that prevents the county requiring measures that might be specific to the development. The is in a unique location that is likely to require unique mitigation requirements. It seems unreasonable to me that they want to be exempt from fire access requirements and mitigation requirements.
- Other impacts: There are numerous other impacts to consider. The development blocks non-motorized areas that are popular with local skiers. The development will be highly visible from town. There will be a huge glow at night in the southern sky.

I am a long time Mission Ridge season pass holder and would like to see them succeed. However, the long list of adverse issues, and inadequately addressed issues leads me to ask that the permit for the proposed development be denied.

Thank you,
Dave Allyn
1451 Eastmont Ave
East Wenatchee, WA 98802

From: [Anna Gullickson](#)
To: comments-pacificnorthwest-wenatchee-wrrd@fs.fed.us
Cc: [RJ Lott](#); [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#)
Subject: Public Comment Mission Ridge Proposed Development
Date: Monday, March 30, 2020 3:24:00 PM

External Email Warning! This email originated from outside of Chelan County.

RCW 36.70A.110 states that counties “....shall designate an urban growth area or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature.” The Mission Ridge area was not designated an Urban Growth Area by Chelan County. The Washington Legislature enacted this law because they “*found that uncoordinated and unplanned growth posed a threat to the environment, sustainable economic development and quality of life in Washington.*”

The Mission Ridge Development would add 4000 pillows making it a community the size of Cashmere. Clearly the development is in violation of this law and its intent.

Good Afternoon and thank you for the opportunity to comment on this proposed development. I am in opposition to the proposal for the following reasons:

- As stated above this development is in violation of RCW 36.70A.110.
- I feel this proposal has been falsely marketed as "expanding the ski resort and a benefit to the local community", when in reality, it's literally just a development project with no benefit to the local community, instead multiple negative impacts.
- The area can not support the drilling of 600 individual wells and sewage systems.
- There is no proper egress in case of a fire or other emergency for a town the size of Cashmere up a steep, windy, snowy, two lane road.
- There will be an increase in accidents with the increase of travel on an inappropriate road for number and passing of people.
- There is a greater wildfire risk due to the increase of human inhabitance

And these are just to name a few.

I would hope that the resort owner would truly be interested in continuing to have the best interest of his local community in mind and at the forefront of his decisions. It continues to be said that there is wide support for this "expansion"/development, but I have yet to find anyone in the local community who believes it is in the locals' best interest or that it is simply a good thing to do. It seems it has been dishonestly promoted and I am strongly against it for the environment, the wildlife, the local community, the skiers, and as a recurring season pass holder.

Thank you for your sincere consideration,

Anna Gullickson
Cashmere, WA

From: James Lieberman
To: RJ Lott
Subject: STOP Mission Ridge Proposed Development
Date: Wednesday, March 25, 2020 2:06:27 PM
Attachments: page2image2647161088.png, page2image2647161376.png, page2image2647161664.png, page2image2647162144.png, page2image2647162432.png, page2image2647162720.png, page2image2647163232.png, page2image2647163648.png, page2image2647163936.png, page2image2647164224.png, page2image2647164512.png, page2image2647161856.png, page2image2647165088.png, page2image2647165376.png, page4image2647939328.png, page4image2647939616.png, page4image2647939904.png, page4image2647940384.png, page4image2647946656.png, page5image2648798064.png, page6image2648207728.png, page7image2648278464.png, page7image2648278752.png, page7image2648279040.png, page7image2648320368.png, page8image2649964704.png, page8image2649964992.png, page8image2649965280.png, page8image2649965760.png, page8image2649966048.png, page8image2649966336.png, page8image2649966848.png, page8image2649967264.png, page14image2566265408.png

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Hi,

Below is obviously copied and pasted. However, it seems rather evident based on prior codes that the current plan is in violation on multiple counts. We need to be exceptionally careful with our wild lands. Now is certainly NOT the time for short cutting the process to allow developers easier access. Please do your job and make sure thought-out prior ordinances, like safe fire, water, natural resource allocations are preserved in a safe manner.

Thank you,

James Lieberman

1. Fire - Proposed Code Modifications are Irresponsible.

1a - Fire Flow (the quantity of water available for fire protection)

The [MR Proposed Development Fire Protection Plan](#) argues for exceptions from code-required fire flows and cites County code allowing downward modification of fire flow where full fire-flow requirements are impractical. The same county code, 15.40.040, also contains a provision allowing the fire flow to be modified upward where conditions indicate an unusual susceptibility to group fires of conflagrations.

[Link to County Code 15.40.040](#)

The County should deny the request for exceptions contained in the fire protection plan. In fact, the fire marshal should increase fire-flow requirements for this high-risk development placed in a fuel-rich dry

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forest. The required fire flow is not impractical if the water supply comes from the PUD. However, the PUD has indicated in their October 18, 2018 Agency Comment letter on MPR 2018-128 that:

"In summary, water service is considered not available at this time until determined permissible and feasible. Significant water system infrastructure will be required and the design, permitting, planning and construction of such infrastructure is a multiyear effort."

This suggests that municipal water will not be immediately available. Until the water issue is resolved, the plan should not be approved.

1b - Ingress/Egress

The Mission Ridge Proposed Development includes only one way in and one way out. The proposed road will be built upslope of a steep sidehill. This geography results in an increased fire hazard from a fire that starts lower in the basin. Codes require an alternate exit to allow residents of the development an escape route in the event that a fire consumes the ingress route. An emerging catastrophic fire in the lower

reaches of Squilchuck creek will quickly overwhelm fire crews and prevent a response further up the drainage because of the one-way in and out road, and the lack of adequate safety zones. However, the submitted fire protection plan argues that section 104.8 of the International Fire Code allows the fire code official to grant modifications for individual cases when the strict letter of the code is impractical. The text of that code provision follows:

Modification to the code is allowed only when the modification does not lessen life and fire safety requirements. Having a 4,000-pillow community trapped by an engulfed access road during an emerging catastrophic fire is a grave threat to fire safety and to life. The road, as currently planned, upslope of a 30% (+) sidehill is unsuitable as a stand alone egress route.

The proposal should be reviewed with a life-safety bias for the public, not a financial bias benefiting a private developer and other businesses seeing opportunities within the project. To approve the single access layout of this project is irresponsible on the County's part. In light of the wildfire losses seen in recent years throughout the West (BC, Alberta, Washington, California, Colorado) it is well understood that a hot August fire could realistically engulf Mission Ridge's entire development despite fire-wise preparations. This risk cannot be mitigated with fuel breaks and defensible space. Consequently, granting an exemption on the requirement of two access roads could easily be defined as negligence on the County's part. Given the leanings of the Washington State Supreme Court to suspend governmental immunity to counties that have bent codes and regulations and that have experienced catastrophic losses as a result, the County puts itself in an untenable future position, legally and financially, by granting such an exemption.

[A] 104.8 Modifications

Where there are practical difficulties involved in carrying out the provisions of this code, the *fire code official* shall have the authority to grant modifications for individual cases, provided that the *fire code official* shall first find that special individual reason makes the strict letter of this code impractical and the modification is in compliance with the intent and purpose of this code and that such modification does not lessen health, life and fire safety requirements. The details of action granting modifications shall be recorded and entered in the files of the department of fire prevention.

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2. Fire - Fire Grief

County decision makers need only interview a few residents of the Broadview neighborhood who lost their homes in 2015 to understand the severe emotional strain and the disruption of life caused by the loss of a home. Subjecting nearly 900 people who will own homes/apartments/townhouses/condos in this new development to the potential loss of life and to the potential emotional strain from a major loss of property is an unjustified offset to the financial gain of a single developer and the cadre of business interests pushing this project.

3. Fire - Increased Population Increases Risk

The following two articles indicate that when people are closer to the forest, there is increased fire risk.

<https://www.pnas.org/content/111/2/746.full> <https://www.pnas.org/content/115/13/3314>

The California Department of Forestry and Fire Protection studying Californian wildfires from 2013 to 2017 determined the following causes: debris burning (13.8%), electrical power (9.4 %), vehicles (8.8%), equipment use (8.2%), arson (7%), lightning (6.4%), campfire (3.8%), playing with fire (1.4%), smoking (1.4%), miscellaneous (14.8%), undetermined (24.6%). Humans cause the majority of wildfires and a development of this sort, which has people living and playing in wildfire-prone forests will increase the likelihood that wildfires will be ignited in our local forests. Such fires will threaten not just this development but the much larger community down valley. This project must not be exempted from upholding the very strictest codes for fire protection, fire safety, and evacuation.

4. Water - No available extra water for domestic or snowmaking exists in the aquifer

The entire wintertime flow of Squilchuck Creek is allocated by existing water rights while both Beehive Irrigation District (senior water right) and Mission Ridge (junior water right) compete to fill their respective reservoirs. Existing water rights in the Spring and Summer exceed the available flow in the creek with Miller water users having their water rights regularly cut when the stream flow is inadequate to cover all existing water rights. The development proposes to drill wells and pump water from the deep aquifers which are hydraulically connected to the surface waters of the Squilchuck drainage. There is no available water to be removed from the aquifer. Any water that the development removes directly affects current water right holders who already consume the entire stream flow. One of the critical findings of the Stemilt Partnership's report is that the upper watershed cannot support Urban-level development, yet that is what has been proposed.

[Link to the Stemilt-Squilchuck Community Vision Brochure](#)

Page 13, Section 2.2.2 Results, of The WRIA 40A Watershed Plan dated May 2007 found the following: "...**most of the physically available water (runoff of precipitation, shallow groundwater, imported**

water) entering the WRIA 40A is withdrawn for beneficial uses."

"Annual water rights are about 50% greater than the estimated quantity of physically available water. Water diverted for new storage may potentially impair senior rights and/or require mitigation of impacts to senior rights."

[Link to Chelan County Watershed plan for WRIA 40A](#)

An alternative to taking water from the aquifer might be to construct a municipal system that pumps water from town. Water is currently supplied by the Chelan County PUD to Forest Ridge. However, the PUD has indicated in their October 18, 2018 Agency Comment letter on MPR 2018-128 that:

"In summary, water service is considered not available at this time until determined permissible and feasible. Significant water system infrastructure will be required and the design, permitting, planning and construction of such infrastructure is a multiyear effort."

This suggests that municipal water will not be immediately available. Until the water issue is resolved, the plan should not be approved.

5. Sewer - Onsite septic systems

The proposal indicates that wastewater will be disposed of through dispersed on-site systems which deposit wastewater into the ground through drainfields. A drainfield is a biological system that depends on bacteria to process waste. How will this system perform under intermittent seasonal use? Can drain fields for 4000 pillows adequately prevent adverse effects to nature? It seems like any municipality of this size (e.g., Cashmere has roughly the same population as the proposed development) would construct a wastewater treatment plant, and not use dispersed septic systems with drainfields.

Orchardists in the Squilchuck drainage irrigate with surface water from Squilchuck Creek. The water is tested on a regular basis during growing season for compliance with legislated food safety standards. If the surface water fails the quality tests, fruit cannot be picked. Who will bear financial responsibility if a 4000 bed community pollutes the Squilchuck drainage and jeopardizes the livelihood of current water rights holders.

6. Traffic - 9468 Average Daily Trips

The Traffic Study appended to the application indicates 9,468 average daily trips and 833 evening peak-hour trips will be generated by the resort. Table 7 of the report estimates 1,050 passenger cars per hour in the southbound direction and 930 passenger cars in the northbound direction reducing the level-of-service (a quantitative measure describing traffic operational conditions and their perceptions by drivers) from LOS A (free flow) and B (stable flow), as the existing condition, to LOS D (high density and driver experiences a generally poor level of comfort and convenience) as the future condition. Compare this to the existing volumes listed in the table of 145 southbound cars and 177 northbound cars. This is a five- to seven-fold increase in traffic on the Squilchuck Road. The study argues that LOS D meets Chelan County Standard, but does it fairly consider the lifestyles of other residents bordering the Squilchuck Road and does it meet our expectations as citizens of the Wenatchee Valley? This increase in traffic serves to enrich the developer but it does so by degrading the lifestyles of current residents and undermining the recreational experiences of the entire community.

7. Stemilt Partnership Mission - Proposal Violates the Mission of the Partnership

The County is not only a member of the Stemilt Partnership, but is the lead organization responsible for establishing the Partnership. The Partnership was formed in 2007 in response to concern over privatization and development of 2,500 acres of DNR forested land in the Stemilt Basin. In 2012 the County purchased 2,500 acres in order to prevent development in the forest. The Stemilt Partnership continues to meet to discuss management of the Stemilt-Squilchuck Community Forest. This information comes straight from the County website. [LINK to County Website](#) The mission of the

Partnership is to protect water resources, conserve critical habitat for fish and wildlife, and maintain recreational access to public lands. The proposed development goes against the founding rationale of the Partnership and violates all three of its central goals by stealing from the water budget in the upper watershed; placing an urban environment in the forest which disrupts wildlife; and degrading existing recreational experiences by overpopulating all of the lands surrounding the development with too many visitors. How can the County even consider allowing the type of development that the Stemilt Partnership was formed to prevent?

The Trust for Public Land website has a good description of the reason for formation and the goals of the Stemilt Partnership.

[LINK to TPL Stemilt Partnership page](#)

8. Development Agreement - Ties the hands of the County

Page 25 of the Development Agreement contains clauses that limit the County from applying County codes and road standards "only to the extent that the code has been adopted by the County for application on a county wide basis". This clause eliminates the ability of technical staff and decision makers to use judgement in application of code and safety standards. The agreement may be written to the benefit of the developer and should be modified to the benefit of the County. The text of these provisions follows:

(1) Uniform Codes. The County may apply the then-current Washington State Building Code, Chapter 19.27 RCW, and other uniform construction codes to new applications for building permits necessary for the development of The Expansion throughout the Term of this Agreement, provided that any such uniform code shall apply to The Expansion only to the extent that the code has been adopted by the County for application on a county-wide basis.

(2) **Life/Safety Road Standards.** The County may impose the then- current road standards necessary to address life/safety issues and concerns, provided that any such life/safety road standard shall apply to The Expansion only to the extent such standard has been adopted by the County for application on a county-wide basis.

DEVELOPMENT AGREEMENT
Page 25 of 65
47Z9571-Development Agreement 1.16.2020

JEFFERS, DANIELSON, SONN & AYLWARD, P.S.
Attorneys at Law
(509) 662-3685 / FAX (509) 662-2452
2600 Chester Kimm Road / P.O. Box 1688
Wenatchee, WA 98807-1688

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9. Violates Washington law on Urban Growth Areas

RCW 36.70A.110 states that counties “....shall designate an urban growth area or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature. “ The Mission Ridge area was not designated an Urban Growth Area by Chelan County. The Washington Legislature enacted this law because they “found that uncoordinated and unplanned growth posed a threat to the environment, sustainable economic development and quality of life in Washington.” [Link to Environmental & Land Use Hearings Office](#) The Mission Ridge Development would add 4000 pillows making it a community the size of Cashmere. Clearly the development is in violation of this law and its intent.

Mission Ridge Expansion Project: Forest Service Draft Environment Analysis

Please use the links below to review the Draft Environmental Analysis released by the Forest Service as well as the scoping document from 2018 when the project was initiated.

- Mission Ridge Expansion Project: Draft Environmental Analysis Feb. 2020
- Temporary Road Map Set
- Categorical Exclusion for Temporary Road Letter
- Temporary Road Determination of Nonsignificance and Use of Categorical Exclusion adopted by WDFW
- Mission Ridge Proposed Expansion Scoping Supplemental Information Aug. 2018
- Mission Ridge Proposed Expansion Scoping Letter

Public Comment are Requested by March 27, 2020

Comments can be mailed to:

Jeffery Rivera, District Ranger Wenatchee River Ranger District 600 Sherbourne Leavenworth, WA, 98826

Or provided by email to comments-pacificnorthwest-wenatchee-wrrd@fs.fed.us, or electronically filed using the [Forest Service online comment submission](#).

All comments must include your name and address to establish 'standing' to provide future comments about or object to the Final Environmental Assessment.

Objections to draft decisions "must be based on previously submitted specific written comments" 1

regarding the proposed project or activity and attributed to the objector." This means you must have raised the issue during public comment (which is occurring now) to have the 'standing' to object to the Final Environmental Assessment and Draft Decision/Finding of No Significant Impacts (FONSI). **So Make a comment NOW to establish a right to object later.**

Forest Service Policy and Substantive Comments

Make your comment count!

Comments on Environmental Assessments are not a voting process. It is not about the quantity of the comments, instead it is about raising specific concerns that relate to specific issues statements. Issue statements should establish the aspects of the project that concern you, how you believe the project *violates law, regulation, or policy*, and supporting reasons that the decision maker (responsible official in NEPA lingo) should consider.

The use of clear issue statements tied directly to the law, regulation, or policy that is violated is the ONLY type of comment that will directly shape and inform the Final Environmental Assessment and Draft Decision.

To be most helpful, comments should be as specific as possible.

- **A substantive comment provides new information about the Proposed Action, an alternative or the analysis;**
- **Identifies a different way to meet the need;**
- **Points out a specific flaw in the analysis;**
- **Suggests alternate methodologies and the reason(s) why they should be used;**
- **Makes factual corrections, or identifies a different source of credible research which, if used in the analysis, could result in different effects.”**

Some Issues specific to the Forest Service EA are listed below. If any of these issues is a concern to you, please feel free to use the information in your comments.

1. **Proposed Road across USFS land to access the private development - No trigger to allow Right of Way (ROW)**
2. **Current Temporary Road - Remediation Required**
3. **Fire - Insufficient Safety Zones for Responding Agencies**
4. **Special Use Permit (SUP) Violations - Disqualify the Holder from expanded SUP Consideration**
5. **Overuse Does Not Currently Exist - Overuse Will Develop with Plan Implementation**
6. **Administratively Withdrawn Areas - Plan Implementation Will Nullify the Value of ADMWD areas**

1. Proposed Road across USFS land to access the private development - No trigger to allow Right of Way (ROW)

Page 12 of the [Draft Environmental Analysis](#) discusses Forest Service Policy FSM2700 which guides the Forest Service in determining when to grant rights-of-ways across National Forest Land. The policy indicates that access should be granted when there is currently no access to the private property and when it is not possible to gain access across non-federal land.

There are existing roads that access the development property on section 19 from adjacent sections 18 and 20, neither of which are federally owned. Therefore, the trigger condition that would advise the USFS to allow access to private land across National Forest is not met. The USFS needs to provide a clear and defensible justification for allowing this road. If such justification cannot be provided, the

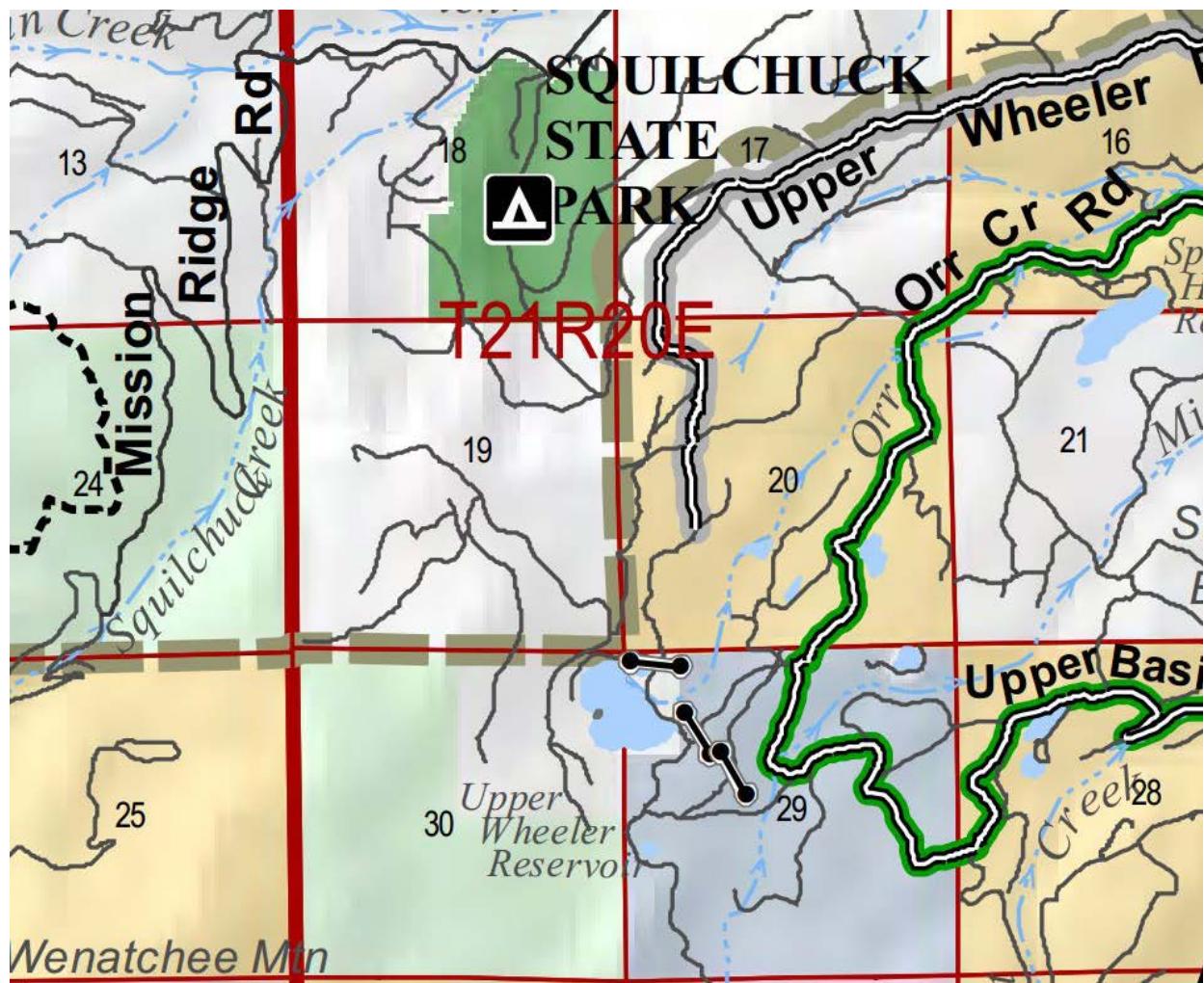
USFS should not grant right-of-way (ROW) and instead should require the use of alternative roads that do not cross lands managed by the USFS.

2. Current Temporary Road - Remediation Required

A temporary road was constructed in 2018 under Categorical Exclusion without public input and with no apparent supervision from the USFS. Categorical Exclusions are used by the Forest Service when the proposed work is so insignificant that to require a permit would create an unnecessary impediment to the work. It is arguable whether the categorical exclusions were appropriate, yet the damage is done. In response to the categorical exclusions, the Department of Fish and Wildlife issued a Determination of Nonsignificance (DNS) which listed several mitigating conditions. Several of these conditions were violated during road construction. Specific condition violations include the following:

2.1 The DNS requires that the ground disturbance not exceed 1-acre.

The actual ground disturbance exceeds 1-acre. Side cast extended up to 200 feet below the road. A conservative calculation of 0.67 miles x 50 foot average disturbance = 4 acres disturbed. This is four times the threshold allowed by the DNS.



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Photo - sidecast below road



Photo - sidecast below road

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2.2 The DNS requires that two temporary bridges be placed at stream crossings.

Bridges were not built.



Photo - Seasonal Stream where bridge was required but not built

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2.3 The DNS requires that trees greater than 8 inches diameter not be removed.

Trees greater than 8 inches were removed.

Photo - tree greater than 8 inch diameter

2.4 The DNS requires that the road will be built within the proposed development road corridor of 32 feet.

The road was not built within the proposed corridor. The photo below shows the proposed corridor in white overlain by a gps track of the

actual road which is shown in red.

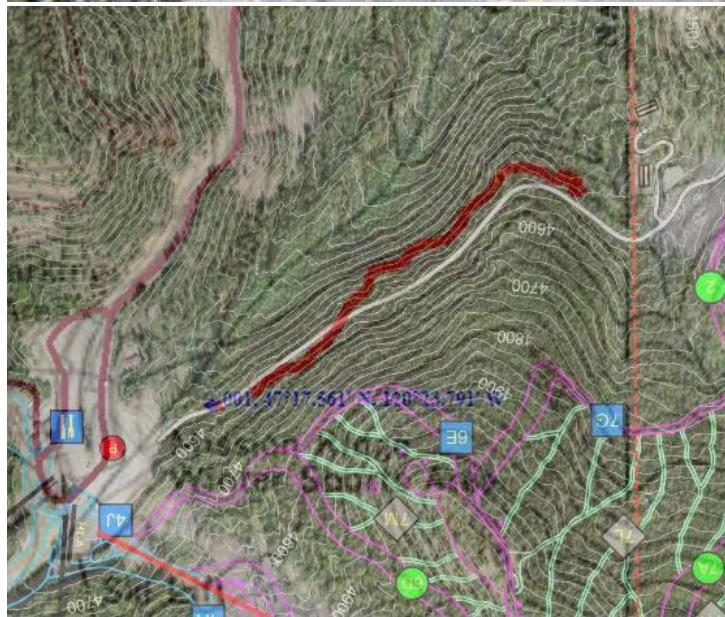


Photo - road overlay

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Since the road does not satisfy the conditions under which it was allowed, the USFS should require immediate and full restoration of the road. The USFS needs to provide a clear and defensible explanation as to how a major road construction project was allowed to be built without oversight and provide assurance to the public that other construction activities proposed by the applicant will be judged in a non-biased manner and constructed in compliance with the permit requirements.

3. Fire - Insufficient Safety Zones for Responding Agencies

Given the location of the proposed development, any fire response will be multi jurisdictional in nature. Responding agencies will include local rural fire departments, the Washington Department of Natural Resources (DNR), and the US Forest Service (USFS). All of these agencies adhere to the same safety standards. These standards place a priority on firefighter safety. Escape routes and Safety Zones are of foundational importance. Considerations for escape routes include fuel type and density, topography including slope steepness and orientation, chimneys, box or narrow canyons, number of routes, and travel time to Safety zZones.

Safety zones will be of a size and nature to protect all firefighters in a worst case scenario. For perspective, the Mission Ridge parking lot is approximately 7.0 acres and is located in the narrowest portion of a box canyon (one way in one way out) above a 20% slope with a mature conifer forest below. The USFS sets standards that require a safety zone of a size and nature that the crew of firefighters could find safety without the use of a fire shelter or other special equipment. One may argue that the Mission Ridge parking lot qualifies as a Safety Zone. It may satisfy the initial calculation of required size for a safety zone which assumes flat ground, no wind, and radiant heat

only. However, the Mission Ridge parking lot is not located on flat ground, and **no wind** is a non-conservative assumption. It is important to emphasize that emergency planning is required to consider worst case situations. For a minimal fire response crew (one engine) to be safe in the Mission Ridge Parking lot, with an upslope wind of 10 mph and 100 foot flame lengths, USFS standards require a Safety Zone over twice the size of the existing parking lot. Additionally any fire response will have to drive over 5 miles on a narrow canyon road with slope angles exceeding 20% most of the way to escape. The Squilchuck drainage has already been designated a high fire risk area. The Forest Service should take into account the role it will play permitting infrastructure that will someday place firefighters in a potentially compromised safety situation.

4. Special Use Permit (SUP) Violations - Disqualify the Holder from expanded SUP Consideration

The Special Use Permit issued to the Mission Ridge Resort in 1984, which does not expire until 2038, is for non-exclusive use of the land by the ski area and specifically requires that the land remain open to the public for all lawful purposes. However, the current ski area management has treated the land more like private property with a gate to prevent motorized entry, a sign that indicates authorized entry only, and wide area closures and policies that limit or prevents use of the land by the public. Specific to the backcountry community, the ski area's restrictive uphill policy is in direct violation of the SUP terms and conditions article F which states "...remain open for all legal purposes". Based on current management practices by the ski area, it is reasonable to assume that if the proposed USFS land in section 30 is included in the SUP area, that the public would be excluded from using this piece of land in similar fashion as the current SUP area. The proposed area is currently used and enjoyed by the backcountry community, and will be felt as a loss when Mission Ridge restricts access and use of the area. The USFS should enforce the requirements of the Special Use Permit and return management of

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the land to recent past practices which allowed public use of the public land and roads. If the SUP area is expanded, the USFS needs to monitor the permit holder and require that "*the lands and waters covered by this permit shall remain open to the public for all lawful purposes*" as stated in the Special Use Permit.

Photo - excerpt from Special Use Permit

Photo - gate at Mission Ridge

5. Overuse Does Not Currently Exist - Overuse Will Develop with Plan Implementation

On page 11 of the EA, under "Regulatory Framework: Management Direction and Guidance", The Wenatchee National Forest Land and Resource Management Plan (FLRMP) states: "New recreation sites should be constructed where demand is high and overuse problems are occurring at existing sites." The allure of the existing ski area and the adjacent backcountry areas in the Lake Clara Basin and the Stemilt Basin is exactly that the area is *not* overcrowded like other ski areas in Washington state. This plan will create an overcrowded recreation area in direct contrast to the goal of the guidance of the FLRMP. The recently created non-motorized winter recreation area in the Stemilt Basin will become largely useless with 4000 pillows located at the base of the skiing area. This increased population will impact trail use to Lake Clara as well, both by increased year round residential recreation, and by wintertime use of residents who chose not to ski in the ski area. More people skiing

F. Area Access. Except for any restrictions as the holder and the authorized officer may agree to be necessary to protect the installation and operation of authorized structures and developments, the lands and waters covered by this permit shall remain open to the public for all lawful purposes. To facilitate public use of this area, all existing roads or roads as may be constructed by the holder, shall remain open to the public, except for roads as may be closed by joint agreement of the holder and the authorized officer.



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on the same terrain does not improve the recreational experience for skiers at Mission Ridge. The proposal is contradictory to the guidance of the FLRMP because it causes overuse.

6. Administratively Withdrawn Areas - Plan Implementation Will Nullify the Value of ADMWD areas

On page 12 of the EA, under Northwest Forest Plan, Administratively Withdrawn Areas (ADMWD) are discussed. ADMWD areas are

designated both south of the proposed development, and west of the proposed development. These areas have been previously identified by the Forest as valuable for recreation, visual, and backcountry use. The proposed plan will degrade the value of all three of the stated values in both of the ADMWD areas. Visually, the night sky will be polluted by light, and the development will be visible from all points north and east, including from Highway 2 near Quincy. The premier and most easily accessible trail in the Wenatchee Mountains is the Lake Clara trail network. Recreational enjoyment of this trail will be damaged if a permanent population of 4000 pillows develops near the trail-head. Backcountry skiing is currently available and enjoyable in the two basins adjacent to the ski area. One of those basins will become side-country to the proposed development and the other will lose value as a destination due to the crowding from the development. The Forest Service needs to consider past valuations of the land before allowing proposed private development to degrade the value of two previously designated ADMWD areas.

From: [Sara Rolfs](#)
To: [RJ Lott](#)
Cc: [Kevin Overbay](#); [Bob Bugert](#); [Doug England](#)
Subject: Tamarack LLC Development (Mission Ridge Expansion) Project Comments
Date: Monday, March 30, 2020 2:38:42 PM

External Email Warning! This email originated from outside of Chelan County.

RJ and Commissioners,

Thank you for the opportunity to provide feedback on the proposed development. I have several thoughts about the development.

As a resident of the upper Squilchuck Valley, I am concerned about the impact the proposed development will have on:

1. Traffic and road infrastructure. I am concerned about the volume of the anticipated traffic increase. Current infrastructure suffers damage each year as it is. If we increase trips I suspect this will worsen, not to mention the impact of the construction rigs hauling building materials. Additionally, the rural culture of the upper Squilchuck will suffer with increased year-round high volume traffic.

2. Wildfire Risk. The proposed development only has 1 way in and 1 way out. This is a disaster waiting to happen. We are well aware that the Squilchuck Valley is primed to have a catastrophic wildfire rip through. Much work has been done to try to mitigate fuel loads and create fire breaks. But, we aren't there yet. As a board member of the Forest Ridge Wildfire Coalition, we have been working on evacuation plans and trying to create fuel breaks around the current Forest Ridge Development (I do not live in Forest Ridge). Forest Ridge should be a 'lesson learned' about how NOT to allow large developments planned with 1 way in and 1 way out especially in fire prone areas. Allowing the proposed development in Section 19 increases the fire risk for all Squilchuck residents and in the case of evacuation will increase the load on infrastructure that is not built to accommodate the current residents well.

3. Water. Most years of the 18 we've lived up the Squilchuck, the water irrigation shares need to be cut before the growing season is over. This is because there is not enough water to support the owned water shares. Allowing a development the size of Cashmere on an already strained water situation is of grave concern to me. We use well water and cannot/do not want to afford to hook up to PUD water. I am concerned that the strain of the a development the size of the proposal will leave us no choice but to have to hook up to PUD water, which means that this private development will have an actual dollar cost impact on me.

4. OVOF. I am a big fan of the Our Valley, Our Future initiative, full disclosure - I am also on the board. I note that the Mission Ridge Expansion is an action item in Action Plan. However, I contend that the proposal submitted does not align with the stated action item. As it reads in the Action Plan, it asks for a 'small village of homes.....on private property that Mission Ridge Ski & Board Resort owns.' First, 'Small Village': I do not ever refer to Cashmere as a 'small village'. I call Cashmere a town or a small city. The proposed plan is for a 'village' the size of Cashmere. I think of Curlew (pop 118) when I think of a village. I do not think of 4000 people as a small village. Second, Mission Ridge does not own the development property. Tamarack

LLC owns the property. I think the assumption unsaid is that if Mission Ridge owns the property where the development happens, then profits from the development will be reinvested into Mission Ridge. This is not the case here. While Mr. Scrinavich owns both Tamarack and Mission Ridge - there is no guarantee that Mission Ridge will benefit from any of the profit making of Tamarack. Calling this project the 'Mission Ridge Expansion' is a bit of a misnomer. Expanding the skiable acres of Mission Ridge is minimal in this proposal. The focus is clearly on the construction of homes and retail sector and not on creating a better ski area.

I am not against any development. Having overnight accommodations near the Mission Ridge base area is a fine idea. My main concerns are about the size of the proposal and its impact on the current culture, infrastructure and ecosystem.

Thank you for your time.

Sincerely,

Sara Rolfs