



Oct 4, 2025

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

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

Dear Mr. Kaputa,

Friends of Mission Ridge is an all volunteer non-profit organization based in Wenatchee that is dedicated to preserving the rural nature of the upper Squilchuck and Stemilt basins. We represent skiers, hunters, bird-watchers, runners, naturalists, bikers, sky-gazers, orchardists, and local business owners who benefit from the upper basin which acts as a catchment for water and is a place where diverse and sustainable forms of recreation boost residents and visitors quality of life. Friends of Mission Ridge is a grassroots member of Winter Wildlands Alliance. Winter Wildlands Alliance (WWA) is a national non-profit, whose mission is to inspire and empower people to protect America's wild snowscapes. Formed in 2000, WWA has grown to include 32 grassroots groups in 16 states and has a collective membership exceeding 130,000

We appreciate the opportunity to provide these comments regarding the Mission Ridge Master Planned Resort Expansion Draft Environmental Impact Statement. The proposed development threatens the rural nature of the upper basins and our organizations are firmly opposed to the proposal as it currently stands. We urge Chelan County to enforce its own codes and rules by selecting Alternative 1, the No Action Alternative. The following comments are numbered to reflect the corresponding chapter and section of the DEIS.

Section 1.5 - National Environmental Policy Act Process

The DEIS states:

"Following the preparation of the EA, the USFS will either issue a finding of no significant impact (FONSI) or will prepare a NEPA EIS. A Draft EA was published by the USFS in February 2020 (included as Appendix A of this DEIS). The NEPA review process is separate from the SEPA review process, but this EIS was prepared in coordination with USFS and this EIS relies in part on work completed in the Draft EA. It is expected that this EIS will be finalized ahead of final USFS review."

Meeting notes from the July 1, 2022 Mission Ridge EIS USFS / County Coordination Meeting ([appendix K - 2022 DEIS Consultation Notes](#)) indicate that: *"The USFS has advice from its Solicitor's Office that the conflicting threshold determinations at the local and Federal level produces litigation risk that is likely unacceptable to the USFS and inadvisable to the County and proponent."* This means that the USFS best practice is to match the level of assessment of local jurisdictions. **The USFS should start over with an EIS instead of an EA. If they can't do this, then the EIS should include EIS level assessment of items that the EA did not study appropriately. This would include white bark pine removal, environmental effects associated with construction of the access driveway through USFS Property from Mission Ridge to the development,**

and environmental effects associated with the proposed new snowmaking reservoir on the proposed expanded Special Use Permit area in Section 30.

Section 2.1 Applicant Project Objectives

The DEIS project objectives are dishonest. The objective of the development appears to be to maximize profit by building a nearly 1000-unit residential development. Almost all of this section in the DEIS is either deceiving or untrue. The section is reprinted below with commentary in blue. The bottom line is that the project is unnecessary to meet the stated objectives, which are either inappropriate or could be accomplished with less disturbance in other ways.

As described in the 2022 Revised Master Planned Resort Overlay and Development Agreement Application (LDC, 2022), the Applicant's objective is to expand Mission Ridge as part of an MPR to enhance existing services

Existing services include skiing, ski instruction, and day lodges, none of which are enhanced by this project. Under the proposed expansion, the number of skiers is roughly doubled and very little new terrain is created. Ski instructor quality will not improve because there is a new city a mile from the base area. With double the skiers, the lodge crowding does not seem to be improved. This project creates additional slope crowding and degrades the skier's experience. It does not "enhance existing services".

and provide year-round outdoor recreation opportunities.

Year round all-mountain activities attempted by Mission Ridge have been shut down repeatedly due to elk and mule deer calving in the area, and should not be allowed or included in the current project proposal. In fact, the July 12, 2005 Land Use Agreement between WDFW and Mission Ridge specifically prohibits all summer activity at the resort except for maintenance, construction, vegetation management, and fire suppression (see clip below).

1.03 Occupancy Restrictions. This Agreement is granted for the purpose of operating a winter recreational ski area from the Saturday immediately prior to Thanksgiving ("First Skiing Day") through April 30 annually during the term hereof. Between May 1 and First Skiing Day of each calendar year, Grantee's occupancy and use of the WDFW Agreement Area is restricted to the limited purposes of maintenance, construction, vegetation management and fire suppression;

Clip from 2005 WDFW Land Use Agreement

Additionally, the upper Stemilt and Squilchuck basins are already used for dispersed recreation by backcountry skiers, snowshoers, snowmobilers, bow hunters, traditional hunters, birders, hikers, trail runners, mountain bikers, campers, paragliders, and others. This project will interrupt the quiet enjoyment of current recreationalists. The summer parking area is only rarely full. Additional parking at the proposed development is unnecessary to year-round/summer recreation in the upper basin. The developer knows this as indicated in section 4.2.1.6 Anticipated Traffic Conditions and Relationship to Wildfire Risk where he argues that the County's onsite person estimation is greatly overstated, asserting that only 11.4% of annual revenue at established ski areas comes from summer operations.

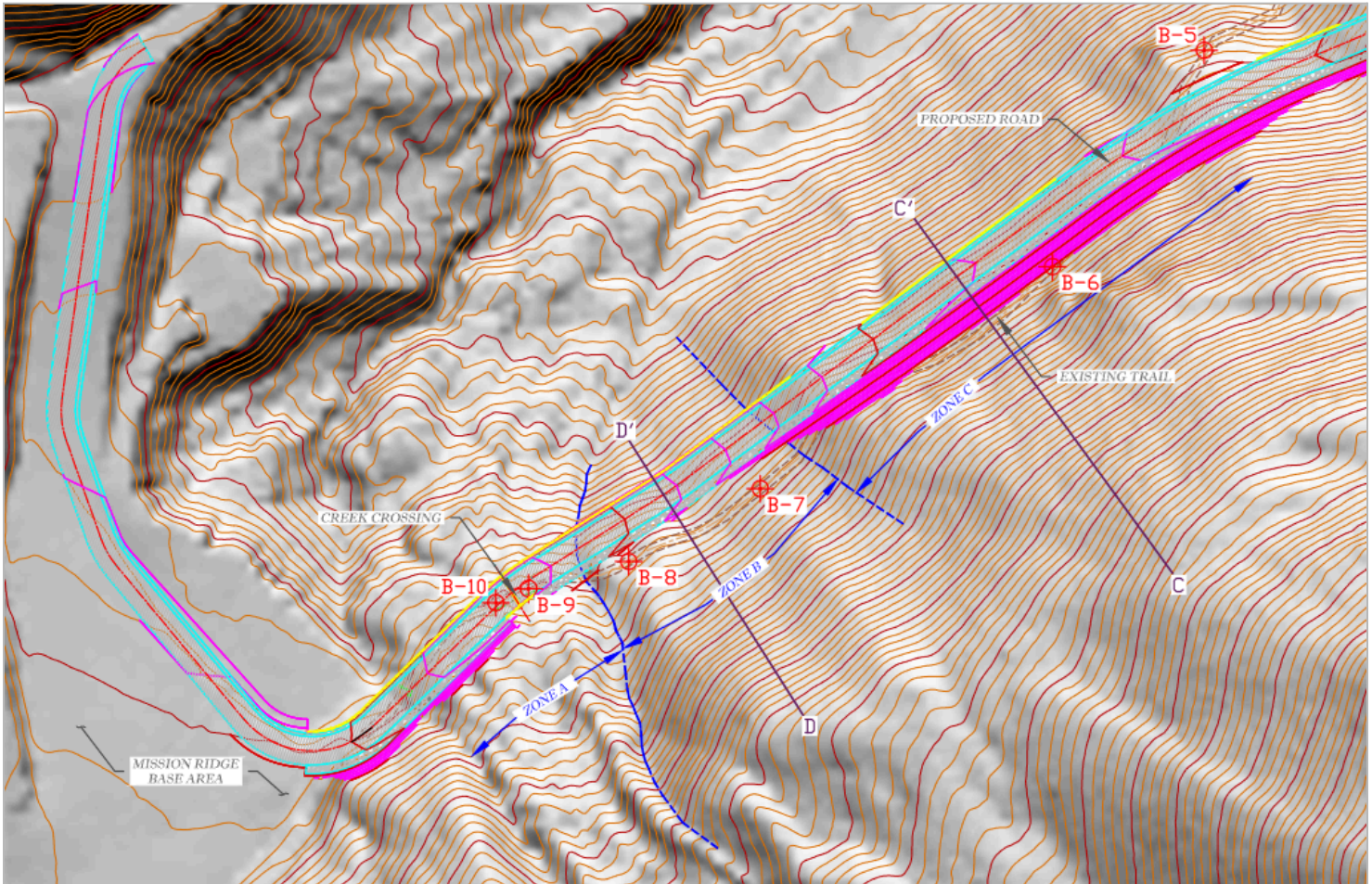
*Current limitations that **impede resort operations** (none of the following impede resort operations) include:*

- *Insufficient on-site parking facilities to meet peak demand*

This is misleading.

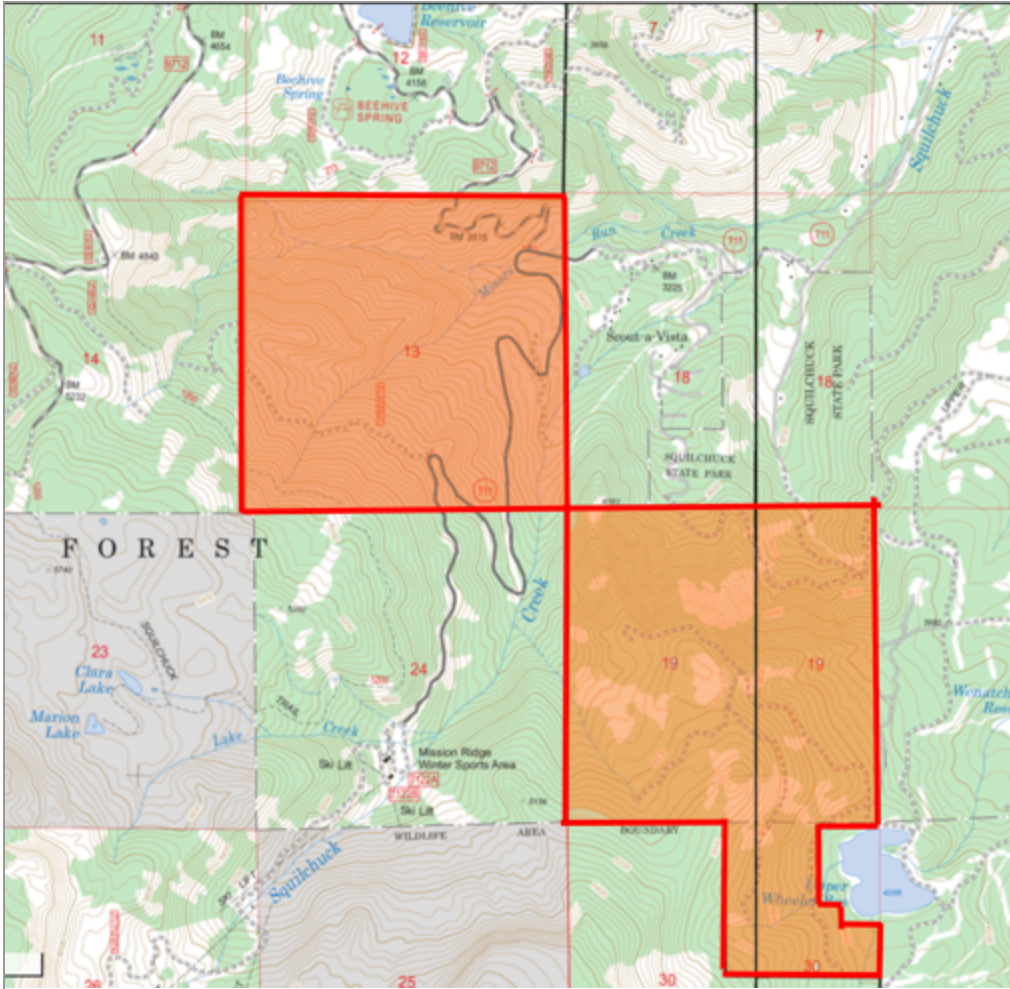
1. First, a full parking lot does not impede resort operations, it only limits ticket sales.
2. Second, a full parking lot is not necessarily a problem that needs to be solved. Full parking lots are a common occurrence at businesses, parks, trailheads, docks, wedding venues, and parking garages. We as a population are conditioned to tolerate full parking lots.

3. Third, the concept of on-site parking implies getting to park at the ski area (not at an off-site day-use lot, 1 mile and two lift rides away from the ski area). The proposed project will extend the Mission Ridge road through the existing lower and third parking lots, eliminating 100-200 spots. Thus, the project results in LESS On-site parking. This does not solve the stated problem of insufficient on-site parking.



Clip from GN Northern Geotechnical Report showing the new road eliminating parking in the lower and third lots.

Off-site parking similar to the project proposal could be created without giving up current on-site spots, and with much less environmental disturbance, by creating new parking on the newly acquired section 13, which has low angle terrain on both sides of the road about a mile downhill from the current parking lot. The travel distance from a Section 13 alternate parking lot to the ski area would be about the same as the distance to the proposed off-site day-use lot at the development. However, the proposed off-site day use lot requires a massive road construction project across public land, and the Section 13 solution does not. The map below shows the Section 13 land owned by the developer on which additional parking could be created.



Orange shaded areas are owned by the developer.

- *Undersized and crowded beginner skier terrain*

The project proposes to solve this problem by creating new beginner runs at the development which is located away from the main ski area. A less drastic alternative to solving the beginner terrain problem within the existing Special Use Permit area would be to install a magic carpet style lift from the base area to the base of the steep Mimi face known as “killer hill.” This would allow beginner access to low angle terrain without having to negotiate a chairlift or rope tow. The skiing public could be separated from the beginner hill by planting a tree row or erecting a fence that directs all skier traffic coming downhill from midway eastward and around the new beginner terrain and onto the lower portion of Sitkum. This would isolate the faster skiers from the beginner area. A similar tactic could provide beginner terrain on Castle which is a low angle run above the C4 midway station. A magic carpet could be installed from the base of Castle face to the C4/Skookum access road, and Castle could be gated against the general skiing public. Beginner skiers could be transported up and down from this mid-mountain beginner run via a short gondola ride. A wonderful treat for the beginning skier! This alternative would not require expansion of the SUP area or construction of a road across National Forest. A third option that would mimic the project proposed solution, would be to create beginner skiing terrain above the new alternate parking on Section 13. Whether there is validity to the complaint about beginner terrain or not, the issue can be improved with little or no environmental impact and without developing the village.

- *Lack of recreation options for nonskiers*

This does not impede resort operations. The ski area sells services to skiers. It is not their responsibility to entertain nonskiers. However, the current dispersed recreation available in the upper Squilchuck and Stemilt

basins offers extensive recreation options for non-skiers. The proposed project would curtail these current recreation opportunities. Providing recreation for nonskiers is an insincere reason for creating a nearly 1000-unit residential development. This is not a problem that needs a solution.

- *Lack of on-site overnight accommodations.*

This does not impede resort operations. The ski area sells services to skiers. Skiers currently ski until closing, then drive a short distance to Wenatchee. The fact that skiers are not staying at hotels or condos near the resort does not impede resort operations. In fact, overnight and year-round population would likely require additional operational bandwidth. This is not a problem that needs a solution.

The Applicant has determined that the Proposed Project is necessary...

The DEIS suggests that this unilateral declaration is a fact. It is not. The project is not necessary for recreation in the upper basin, it complicates and degrades current non lift-skier recreational use and does not account for a variety of different users.

...to provide diverse outdoor recreation opportunities sufficient to meet public demand, both locally and regionally.

This project creates some new, to the detriment of many existing, outdoor recreation opportunities. The public demands that public lands stay in public hands. Mission Ridge has a history of limiting or denying travel across lands within their special use permit area. This is discussed below in Section 4.4.3.3 Proposed Mitigation Measures under the Violation of Special Use Permit LEA410104 heading. This behavior can be expected to continue, Extending the boundaries of the ski area's special use permit will effectively eliminate access to recreationalists who currently use that area as a travel path between the Mission Ridge parking lot and the Stemilt Basin.

In addition, the public demand cited in the DEIS does not agree with the actual demand that skiers have expressed. The purpose and need section of the 2020 USFS Draft Environmental Analysis addressed public priorities: "Skier Surveys conducted at Mission Ridge in 2003 indicated that the highest priorities for improvements are: upgrading lifts with faster, higher capacity conveyances, expanding terrain served by lifts, and improving snow conditions by expanding snow making."

The proposed development addresses none of these issues. Lift improvements are not included in the proposal. To consider this proposal as a ski area expansion is deceitful. The SUP area expansion does increase the size of the ski area, but does not add skiable terrain aside from the limited and low elevation intermediate and beginner runs directly above the development. There is no new lift access terrain within the ski area. It simply is not a meaningful expansion. Snow conditions are not improved by expanded snowmaking associated with this proposal. The expanded snowmaking required by this proposal only serves to cover the low elevation runs between the development and the ski area. This does not improve snow conditions at the ski area, and may even result in less snowmaking effort at the ski area in order to keep the village ski runs covered. The proposal does not address the public demands and expectations described in the skier survey listed in the Environmental Analysis.

The Proposed Project is intended to meet the requirements of an MPR Overlay District pursuant to Chelan County Code (11.89, Master Planned Resorts Overlay District). Per the code, the purpose of an MPR is "to enhance and diversify the recreational and economic opportunities in Chelan County through the development of master planned resorts that complement the natural and cultural attractiveness of the area without significant adverse effects on natural and environmental features, cultural or historic resources".

The project does not meet the requirements of an MPR Overlay District. This is discussed in **section 4.4.3 Findings for the Proposed Project, 4.4.3.2, Impacts from Operation**. In addition, meeting the MPR requirements is not a project objective but a strategy to achieve the desired residential density of the proposed development. A discussion of MPR appropriateness does not belong in the Project Objectives section.

The project is unnecessary to meet the stated objectives which are either inappropriate or could be accomplished with less impact. Additionally the project does not meet the requirements of an MPR Overlay District and that discussion is not appropriate to a project objectives section. **The DEIS should be revised to provide reasonable project objectives and delete discussion of the MPR strategy from the project objectives section.**

Section 2.3 Proposed Project

Section 2.3.2.2 Construction Phasing

The DEIS states:

*"Planned infrastructure phasing includes development of roads and other infrastructure within each phased-area, as well as large-scale infrastructure system upgrades/additions as more development comes online. The latter **may include** the following:*

- *Transitioning from OSS/LOSS, to OSS/LOSS with some advance treatment, to a WWTP.*
- *Transitioning from on-site groundwater wells as the exclusive source of potable water to using groundwater wells in combination with water service from Chelan PUD's Squilchuck Water System.*
- *Beginning with initial minor electric power infrastructure upgrades (until organic demand develops along with later phases of the MPR proposal) requires the construction of a new transmission main, substation, and distribution system."*

The developer's intention is to install the first phases without completing public improvements to wastewater, water supply or electrical power delivery. The **highlighted phrase** above allows the possibility of never transitioning from unacceptable utility installation to the promised condition. [Chelan County Code 11.89.040\(8\)](#)

General Requirements for Master Planned Resorts requires that:

"(8) All required public improvements including roads, utilities and public facilities that are part of the approved site plan and narrative shall be completed prior to issuance of a certificate of occupancy by the building official or installation guaranteed by the posting of performance bonds or other surety acceptable to the prosecuting attorney in an amount of one hundred fifty percent of the estimated cost of the outstanding improvements, except that all life/safety improvements must be installed and in operation prior to occupancy."

Phasing public improvements violates the intent of the code which is to guarantee that the developer install and pay for required public improvements. **The DEIS should be revised to assume that the developer will be held to established rules (i.e. the Chelan County Code) and that PUD water will need to be provided, a wastewater treatment plant will need to be designed and constructed, and power delivery will need to be either bonded at 150% estimated cost, or completed prior to issuance of a single certificate of occupancy.**

Section 2.3.3 Proposed Project Operation and Phasing

The DEIS states:

"If permitted, each phase of the Proposed Project would be self-sufficient and would not be dependent upon a future phase. Each phase would represent a logical and compact extension of infrastructure and services. Consistency with County MPR requirements for phasing is discussed more in Section 4.4 (Land and Shoreline Use)".

The developer has the ability to stop construction at any time with no obligation to complete future phases. The project narrative suggests using up existing utility resources until construction of the next phase would require upgrade of the PUD water delivery system, construction of a wastewater treatment plan, road intersection improvements, and upgrade of the PUD power delivery system. If permitted as described in the DEIS, the developer could stop construction after the third phase, with 82% of the project complete, and with very little of the utility cost or mitigation requirements complete or paid for. **The DEIS should be revised to require comprehensive full project mitigation prior to the issuance of the first occupancy permit, or else the**

project should be reduced in scope to permit and mitigate for only the first three phases. (A future permitting effort would then be required if the developer decides to move forward with phases 4 and 5).

Section 2.5 Determining Environmental Impact Statement Alternatives

The DEIS defines an alternative as *“other reasonable alternatives for achieving the proposal’s objectives on the same site.”* The SEPA definition is *“an action that could feasibly attain or approximate a proposal’s objectives, but at a lower environmental cost or decreased level of environmental degradation...”* The DEIS considered potential alternatives using the following criteria:

“Chelan County evaluated potential alternatives to determine whether they met the proposal’s objective, using the following criteria:

- Do they feasibly obtain or approximate the proposal’s objective?*
- Do they provide a lower environmental cost or decreased level of environmental degradation than the Proposed Project?”*

However, no alternatives were offered in the DEIS. The DEIS’s consideration of alternatives is impermissibly limited to the proposed development project and a no action alternative. An EIS is required to consider a reasonable range of alternatives. [WAC 197-11-440\(5\)](#) defines Alternatives Including the Proposed Action and states that *“Reasonable alternatives shall include actions that could feasibly attain or approximate a proposal’s objectives, but at a lower environmental cost or decreased level of environmental degradation.”*

The DEIS summarily refuses consideration of any additional alternatives here, citing to WAC 197-11-440(5)(d), which limits alternatives for private proposals on a specific site to reasonable alternatives located on that site. However, the DEIS fails to explain why there are no reasonable alternatives on the proposed site. The self-stated goals of the project are to increase parking, beginner ski terrain, recreation for non-skiers, and overnight accommodations. There are limitless reasonable alternatives that could achieve these goals with lower environmental costs than the proposed project. For example, eliminating single-family homes from the mix of residential units would reduce the amount of impacted land, even if the units were replaced by multi-family units or hotel/lodge rooms. Further, the DEIS provides no justification for the nearly 1000 units it proposes to build nor why an alternative with fewer units would not be a reasonable alternative. Additionally, this project does not qualify as a “private proposal” under WAC 197-11-440(5)(d) because it involves development on state and federal land. WDFW’s decision whether to allow this development on its land or not is entirely discretionary. The use of WDFW land requires WDFW to consider whether there are other alternatives on other sites that could meet the objectives of this project

One alternative that could be considered is alternate access. The proposed driveway access road is environmentally invasive as it traverses steep sideslopes through important habitat and requires massive earthwork, creating landslide risk and visual impacts. An alternative is warranted. If single access is to be considered, then a reasonable alternative would be a single access from the Stemilt basin instead of from the Squilchuck basin. Both alternatives would provide vehicle access to the new development and to the off-site parking for the ski area. Both the proposed alternative (access from the existing Mission Ridge parking lot by extending the County road across very steep sidehill on USFS property), and the alternative access (improve existing roads on WDFW and Wheeler Ridge LLC property to the east in the Stemilt basin), would be complicated by building and maintaining a road on land not owned by the applicant.

However, the proposed access cuts a brand new road across severe sideslopes with un-mitigatable visual impacts (see EA clips below). The alternative access Route Option 1 described in the applicant’s Aegis Engineering 2023 *Secondary Access - Review of Options* report ([Appendix D to the DEIS](#)) traverses mild slopes with no cross slopes along existing roads at a significantly lower environmental cost and decreased level of environmental degradation.

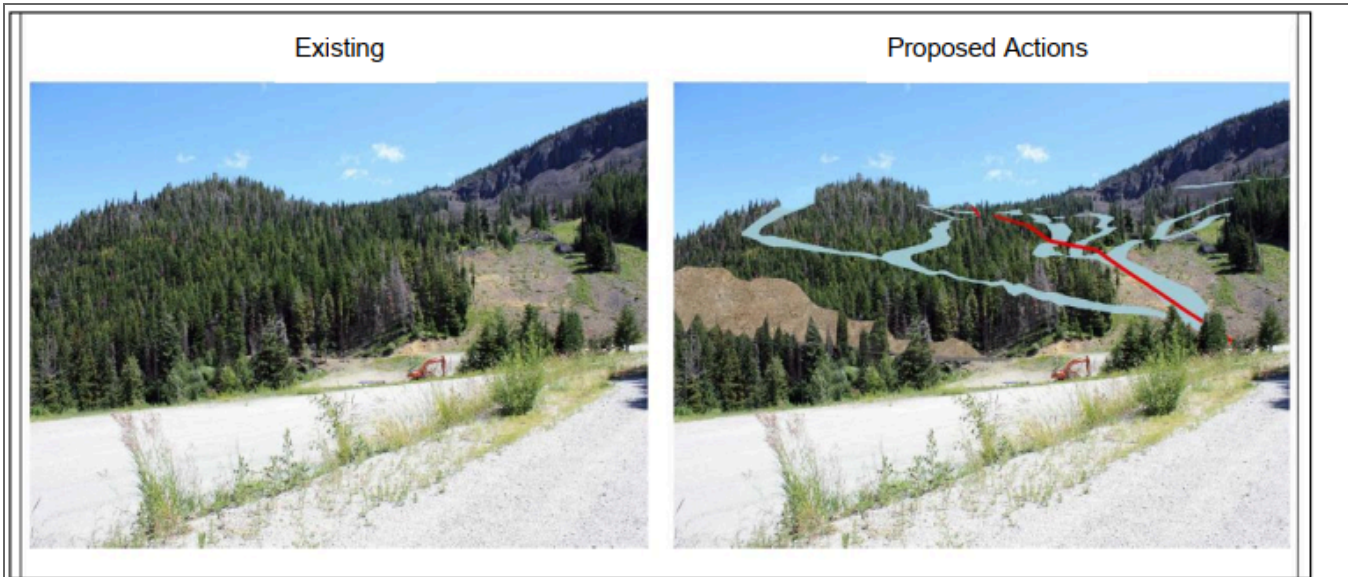


Figure 3-28. Visual simulation of Proposed Action from the Mission Ridge Ski Area parking lot. The picture on the left shows the existing condition. The picture on the right simulates changes to the scenic integrity resulting from construction of the access road (tan), ski runs (blue) and Chair 6 (red). Provided by Ecosign.

Clip from Visual Resources section of 2020 Mission Ridge Expansion Project draft Environmental Assessment



Clip from Visual Resources section of 2020 Mission Ridge Expansion Project draft Environmental Assessment

The viability and environmental cost of this alternative should be examined and compared to the proposed access road. This comparison should include alignment, profile, earthworks, visual impact, and future monetary costs to the community for maintenance (since the proposed road traverses steep sideslopes with greater risk of landslide, rockfall, runoff and erosion damage to the road). The applicant's engineering report approves the alignment and profile of the alternative road:

"...this option minimizes impact by following the existing alignment of Wheeler Creek Rd for that majority of its length, Ecosign rates the alignment of Route Option 1 as Reasonable and Practical...."

"In general, the profile of Route Option 1 conforms to the design criteria. This route has a maximum slope of 12% and conforms to natural gradients. Since this profile conforms well to natural ground and avoids excessive steep grades, Ecosign rates the profile of Route Option 1 as Reasonable and Practical."

The only criticisms that the engineering report has for the alternative Option 1 access road are:

1. that it travels through land not controlled by Mission Ridge
2. that there is excess cut material to be removed from the site.

By this argument, the proposed access road is unreasonable and impractical since it too travels through land not owned by Mission Ridge and will produce surplus cut material to be trucked off-site.

No preliminary design is provided for review of the earthworks required to construct the proposed main access road. However, a conservative estimate of 190,000 cubic yards can be used for comparison. The alternative analysis should include preliminary road design of the proposed access in order to compare the practicality of the two alternatives. A comparison of the proposed access and the alternative Option 1 access follow:

Compare proposed access road to Aegis Engineering Option 1 Alternative

	Proposed Access Road	Option 1 Alternative
Traverse steep side slopes?	Yes, up to 70% ⁽¹⁾	No side slopes
Require large cut banks?	Yes, 1:1 cuts up to 200 feet! ⁽¹⁾	None
Require excess cut trucked off-site?	190,000 cy ⁽²⁾	59,527 cy ⁽³⁾
Follow existing road alignment?	No. All new road cut	Yes. 100% on existing roads
Visual Impacts	Yes. 200 foot road cuts	None
Feasibly attain the proposal's objective (vehicle access to the development)	Yes	Yes
Impact to on-site parking	Builds County road through existing on-site parking area reducing ski area site parking by 100-200 vehicles	Preserves current on-site parking

Sources:

1. Draft EA p. 140
2. Estimated
3. Ecosign Analysis of 5 Secondary Road Options (appx D)

The Aegis Engineering Option 1 secondary access is less impactful than the proposed main access road and would make a reasonable alternative access to the development. **The DEIS should be revised to include additional alternatives that could feasibly attain or approximate the proposal's objectives on the same site, but at a lower environmental cost. Included in these additional alternatives should be a viable alternative to the proposed main access road.**

Section 2.6 Alternatives Considered but Eliminated

Section 2.6.1 Integrated Power Planning - costs

The DEIS states that the current power grid in the Squilchuck area is 95% used up. The PUD has short term plans to make improvements to support organic (no development) growth for approximately the next four years. However, the DEIS suggests that these PUD paid for improvements should power the first two phases of the development.

"Chelan PUD has short-term projects that are intended to make approximately 2.0 mW available to support organic growth and potentially the first phase or two of the Applicant's proposal".

This would constitute a violation of [Chelan County Code section 11.89.050\(10\)](#) on Master Planned Resorts which requires that:

*Existing public service purveyors may provide services as long as the costs related to service extensions and any capacity increases generated by the development **are borne by the development** and such extensions do not promote sprawl or urban level of development adjacent to the MPR.*

The developer's proposal relies on power system improvement costs that are borne by the community and not the developer. **The DEIS should be revised to clarify that the cost of all public service extensions and capacity increases must be borne by the developer.**

The final paragraph in section 2.6.1 states:

When Chelan PUD is ready to advance planning for a new substation and transmission line, they will be responsible for ensuring that all elements of SEPA are completed.

This suggests that the SEPA costs and possibly the cost of capital improvements to accommodate the development could be borne by the PUD, and not the developer. Per MPR [Section 11.89.040\(8\)](#), all utility improvements that are part of the narrative must be either completed or bonded at 150% estimated cost prior to issuance of a certificate of occupancy.

(8) All required public improvements including roads, utilities and public facilities that are part of the approved site plan and narrative shall be completed prior to issuance of a certificate of occupancy by the building official or installation guaranteed by the posting of performance bonds or other surety acceptable to the prosecuting attorney in an amount of one hundred fifty percent of the estimated cost of the outstanding improvements...

The DEIS should be revised to clarify that the cost of all public service extensions and capacity increases must be borne by the developer and that improvements must be installed or bonded prior to occupancy. This includes SEPA study costs, new substation cost, power line improvements, and all costs associated with capacity increase to accommodate the development.

Section 2.6.1 Integrated Power Planning - Phased Review

The DEIS describes the planned phased review of transmission line construction:

"Chelan County believes this meets the intent of phased review under WAC 197-11-060(5)(g), and the provisions under WAC 197-11-080 where agencies can proceed with phased review when project level information is speculative or not known."

The transmission line construction needed to facilitate this project is impermissibly excluded from review in the DEIS. WAC 197-11-060(5)(d) provides that phased review of a project is inappropriate where it would segment consideration of proposals required to be evaluated in a single EIS under WAC 197-11-060(3)(b). WAC 197-11-060(3)(b) prohibits consideration in separate EISs of projects that are "related to each other closely enough to be, in effect, a single course of action." It further elaborates that "closely related" means aspects of a project that "(i) cannot or will not proceed unless the other proposals (or parts of proposals) are implemented simultaneously with them; or (ii) are interdependent parts of a larger proposal and depend on the larger proposals as their justification or for their implementation."

The proposed resort development and transmission line construction meet both of these factors for being closely related. The DEIS openly admits that "Chelan PUD has determined that full build-out of the Proposed Project would require a new standard configuration substation and corresponding transmission line." That fact alone is enough to establish that these projects must be reviewed in a single environmental document, the transmission improvements would not be moving forward without the resort, and the resort cannot move forward without the transmission line improvements.

The DEIS claims that phased review is appropriate here under WAC 197-11-060(5)(g). However, WAC 197-11-060(5)(g) is not applicable to this development application. That provision allows improvements to a “large existing or planned network” to either consider the overall network or limit it to some “future elements” of the network. Thus, it might allow the County to conduct a phased review of the construction of the transmission line, separate from consideration of the overall transmission network. However, nothing in the provision allows a specific transmission line that is necessary for a project to move forward from being excluded from consideration alongside that project. **The DEIS should be revised to consider transmission line construction.**

Section 4 - AFFECTED ENVIRONMENT, POTENTIAL SIGNIFICANT IMPACTS, AND MITIGATION MEASURES – IMPACTS WITH SIGNIFICANT AND UNAVOIDABLE IMPACTS

Chapter 4 of the draft EIS concludes that the project would have significant adverse impacts with 4 elements of the project’s affected environment. The document introduces these 4 elements as follows:

- **Earth.** *Construction and operation will create increased loading in an existing high landslide risk area.*
- **Fire Risk:** *Operation will lead to increased activity in an existing high fire risk area.*
- **Visual:** *Night ski operations will introduce new light and glare sources that cannot be mitigated.*
- **Land Use:** *While consistent with local planning, land use determination will change as a result of operation of the Proposed Project.*

Note the **highlighted** Land Use description in the introduction of section 4 claims that the project is consistent with local planning. This is not true. The project density is not possible without a Master Planned Resort Overlay, and the project does not satisfy the requirements of an MPR. (This is discussed thoroughly in [section 4.4.3, Findings for the Proposed Project, 4.4.3.2, Impacts from Operation, in the MPR section](#)). The project violates every recent community vision document, the Urban Growth Act, and Chelan County Code. It is not consistent with local planning. **The DEIS should be revised to delete this misleading and untrue persuasive language.**

Section 4.2 - Fire Risk

Section 4.2.1.1 Wildfire Risk in the Proposed Project Area

The DEIS understates fire behavior suggesting that the worst case wildfire scenario would be contained in several days or weeks. The Wenatchee community has been exposed to several wildfires in the past decade that burned millions of acres and were never contained, extinguishing only after the change of seasons brought snowfall. Here the DEIS describes expected fire behaviour:

“...a wildfire that starts in June during a lunchtime thunderstorm will most likely be contained before sunset, while a wildfire that starts in late August with an associated high wind event has a very good chance of not being contained for several days or weeks.”

Ignoring the potential for large uncontrollable fires is dishonest when discussing overall fire risk. Further, the DEIS discusses defensible space and fire breaks as if those firewise actions erase danger to residents in the event of a fast moving wildfire. Fires have been documented to cast embers 18 miles. (Werth, P.A. et al. Synthesis of Knowledge of Extreme Fire Behavior. USDA FS PNW-GTR-854 (2011). [Synthesis of Knowledge of Extreme Fire Behavior: Volume I for Fire Managers](#). Local shrub steppe wildfires have cast embers to ignite warehouses a mile away, and cast embers even further, across the Columbia River. Fire breaks and defensible space are not effective protection against large uncontrollable wildfires. In addition, the risk described in the DEIS is based on historical forest conditions which have changed drastically in the last year. Beetle kill in the upper basin, so recent that the red needles from the dead and dying trees have not yet fallen to the ground, has changed the fire risk climate with the addition of vast stands of dead dry whitebark and lodgepole pine that were green as recently as 2024.



Widespread beetle kill in the upper Stemilt Basin, September 2025.

The DEIS should be updated to acknowledge the possibility of very large uncontrollable wildfires and to assess risk associated with the current and projected future, not the historical, condition of the surrounding forest.

Section 4.2.1.2 Shelter-in-Place Strategy and Safe Refuge Areas - Safety Zones

The DEIS uses indecisive language around the proposed Shelter-in-Place and Safe Refuge Areas.

*“The existing main surface parking lot is approximately 7.8 acres of graveled surface and **may** satisfy National Wildfire Coordinating Group (NWCG) and National Institute of Standards and Technology (NIST) standards for safety zones.”*

*“The Proposed Project will introduce additional safe refuge areas to serve as potential shelter-in-place locations, including the proposed parking lot that will include 4.3 acres and approximately 590 parking spaces, (which **may** also meet NIST and NWCG standards for safety zones)...”*

The assertion, without analysis, that the Mission Ridge parking lot is a safe space where evacuation is not required is irresponsible. The following commentary (taken from a public comment to Chelan County) suggests that the Mission Ridge parking lot is significantly undersized as a safe zone for even one vehicle and three people.

Safety Zones are well understood and defined. Criteria for safety zone size are provided by various documents in the firefighting safety world including the National Wildfire Coordinating Group, the International Journal of Wildfire -Wildland Firefighter Safety Zones and the National Fire Protection Association (NFPA) Standards for Roads. These are a few important points to be made when considering safety zones:

- 1. A safety zone should be completely safe; no risk from fire, and easy to use.*
- 2. Avoid locations; upslope, downwind, chimneys, narrow canyons, steep uphill, single Ingress\egress.*

3. *Required Safety zone size increases (possibly more than double) as wind exceeds 10 Mph.*
4. *Required Safety Zone size increases (possibly more than double) as the slope of the surrounding terrain increases to 20%.*

The statistics at Mission Ridge:

1. *The parking lot is approximately 8 acres*
2. *Its widest point, parallel with the slope, is less than 600 feet. The average width parallel to the slope is around one half that distance.*
3. *The slope below the parking lot is approximately 20%, the narrowest part of the canyon, heavy fuels, single ingress egress.*

For this parking lot where a 100-foot flame length can be expected (conservative estimate for this fuel model), a safety zone capable of protecting a single vehicle and three people needs a minimum of 400 feet of separation from the nearest fuel. This translates to about 12-acres of open land given flat ground and no wind. Add the slopes around the Mission Ridge parking area and the high likelihood of strong winds, and 25 to 30 acres of open ground may be needed for a safety zone.

Suggesting that areas “may” satisfy safety zone requirements is misleading and unhelpful in decision making. To understand the risk to a resident stranded at the development during a wildfire, the actual safety zone risk must be determined. “May be ok” is not good enough. **The DEIS should be revised to provide specific analysis of the Mission Ridge Parking Lot and any other area intended to be utilized as a safe zone, to determine conclusively whether those areas are, or are not, adequate safe zones where evacuation will not be needed.**

Section 4.2.1.2 Shelter-in-Place Strategy and Safe Refuge Areas - Shelter-in-Place Risk

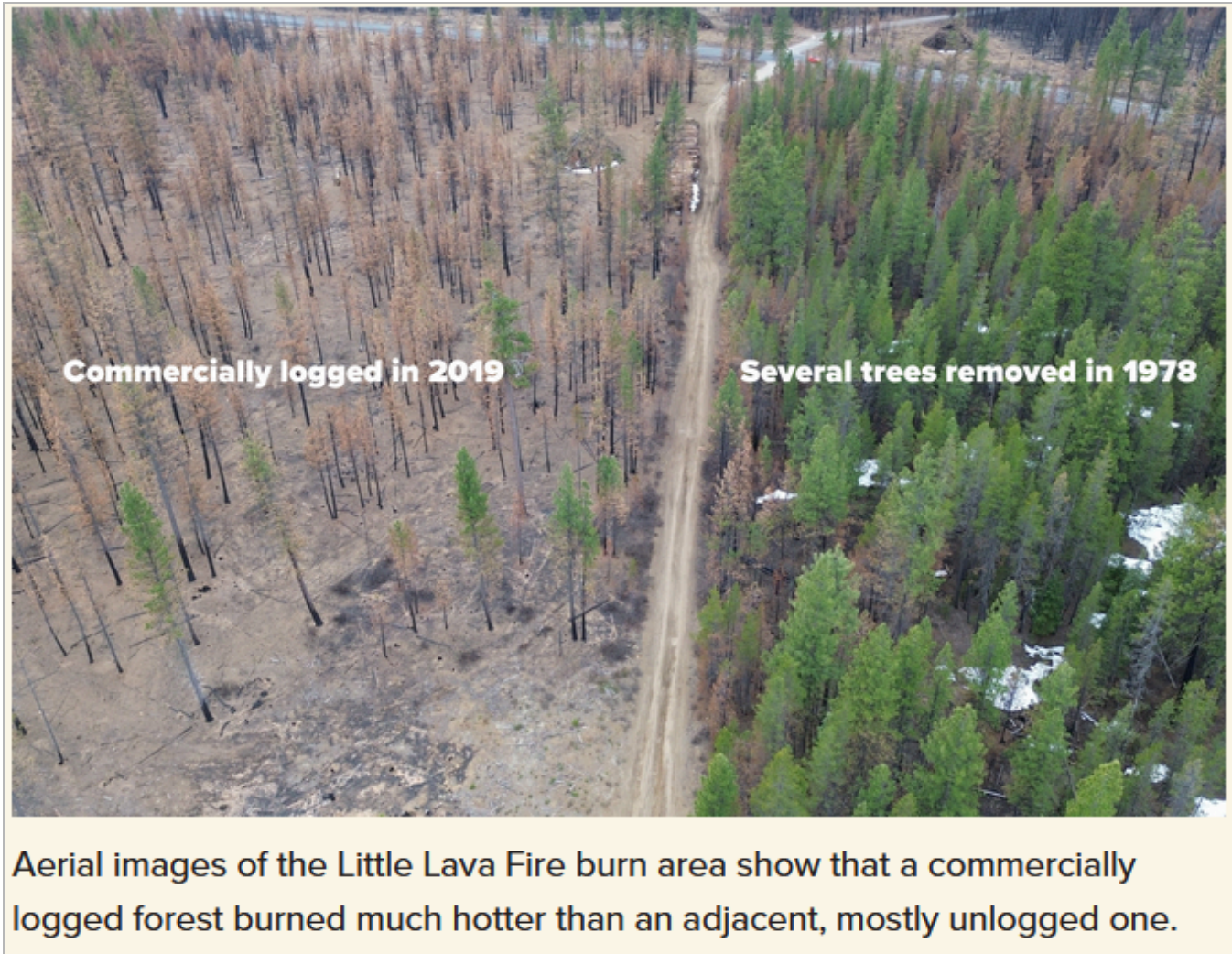
The DEIS states that:

“Overall, the risk of the expanded population having to shelter-in-place is low because the highest fire risk is towards the south and west of the Proposed Project and does not coincide with the direction of egress towards the north along Squilchuck Road...”

This is faulty logic and dishonest. Having the highest risk from ignition in one location, does not imply low risk of ignition from another direction. The DEIS in Section 4.2.2.1 Fire Risk Behavior Around Proposed Project considers an ignition from the north to pose immediate and moderate (not low) risk to the proposed project. Embers cast from a high risk southern ignition fire could result in fire blockage of the single planned escape route. **The DEIS should be revised to remove persuasive language intended to downplay the danger associated with wildfires and blockage of the escape route.**

Section 4.2.1.4 Fuels Management in the Proposed Project Area

This chapter of the DEIS describes completed and future fuels reductions in the vicinity of the project and claims that the work will reduce wildfire risk by reducing fire intensity, rate of spread, and flame length. Fuels reduction reduces damage by fire in some cases, but not all. The May 21, 2025 Sami Godlove article, [Little Lava Fire in Central Oregon shows logging does not prevent wildfire spread](#), highlights a 2024 fire where logged areas burned hotter than untreated areas.



Little Lava Fire, 2024 Deschutes National Forest

The language in the DEIS appears designed to suggest that fire risk could be ignored because the developer is reducing fuels. **The DEIS should be revised to remove persuasive language aimed at suggesting treated forests are free from fire risk, which is not true.**

The DEIS goes on to assert that:

*“The remaining property to the east of the Project Area and west of Upper Wheeler Reservoir is scheduled to receive fire hazard reduction treatments. This will include all the acreage owned by the Applicant south to the USFS property. This area contains a large number of overstory trees, dead and alive, that will need logging equipment to effectively remove them. This treatment will occur as log market conditions allow the project to proceed **but no later than Phase 2**. Conducting the timber harvest will reduce the wildfire risk in the stand and also the adjacent Proposed Project, which is uphill from the proposed harvest.”*

Assertions of future treatments do not reflect current risk conditions. If the DEIS is to consider the fire risk including future treatments, then those treatments should be an enforceable condition of approval for permitting. **The DEIS should be revised to remove promises of future fuels treatments, or include these treatments as enforceable conditions of approval to be paid for by the developer and included in the mitigation section of chapter 4.2.**

Section 4.2.1.5 Emergency Access in Proposed Project Area - Fire Station

The DEIS states:

"The proposed project would be within distinct service areas within Chelan County for fire protection and emergency response. The Applicant has proposed that the Project Area be annexed into CCFD1 and a new fire station be constructed adjacent to the new day-use parking lot".

CCFD1 does not have sufficient existing capacity to respond to an emergency at the proposed development within the District's levels of service and Delivery Standards ("LOS"), or without a reduction in the District's ability to respond to calls in other areas of the District. The only solution for this project is to have a dedicated fire station constructed in the Expansion Area. In addition to a new station, the District would require new apparatus dedicated to serve the project. This would include a Type 1 Fire Engine, a brush truck, a rescue squad, PPE for 14 firefighters, office and living quarter furnishings, and other supplies required for the new station. (Source - CCFD #1 Fire Chief, Brian Brett's March 30, 2020 [comment letter](#) to Chelan County regarding the project). Chelan County Code [section 11.89.040 General Requirements](#) for MPRs (10) states:

"...Existing public service purveyors may provide services as long as the costs related to service extensions and any capacity increases generated by the development are borne by the development...."

However, the DEIS does not indicate that any of the BLS or fire protection costs will be borne by the development and only offers a location for Chelan County to build a fire station (to be paid for by the County). According to the Fire Chief's [comment letter](#): *"The SEPA Checklist fails to discuss the need to increase facilities except that a possible location for a future fire station was identified on a site plan. However, Page 9a of the Resort Base and Real Estate Schematic shows the District sharing the location of the fire station with a Ski Maintenance Facility, which the District cannot accept as it does not incorporate the minimum facilities required by the District."* Further, since fire and BLS response are safety issues, according to [Section 11.89.040\(8\)](#) of the MPR code, all safety improvements must be installed and in operation prior to occupancy:

(8) All required public improvements including roads, utilities and public facilities that are part of the approved site plan and narrative shall be completed prior to issuance of a certificate of occupancy by the building official or installation guaranteed by the posting of performance bonds or other surety acceptable to the prosecuting attorney in an amount of one hundred fifty percent of the estimated cost of the outstanding improvements, except that all life/safety improvements must be installed and in operation prior to occupancy. (Res. 2007-98 (part), 7/2/07; Res. 2001-60 (part), 4/17/01).

The DEIS should be revised to clarify that consultation with Chelan County Fire District is required and all costs for new service extension and capacity increase, including a new fire station and all apparatus required for that station, shall be borne by the development, and that these improvements must be in place and in operation before a single occupancy permit is issued.

Section 4.2.1.5 Emergency Access in Proposed Project Area - Single Access Road

The DEIS acknowledges that the proposed single access road could be blocked, but downplays the danger of a blocked exit during a wildfire as an inconvenience, or hindrance, temporarily requiring visitors to shelter-in-place until the danger has passed, and preventing residents from getting to and from work or school. The conversation ignores the potential for trapped guests to be killed by wildfire as has happened recently in the 2023 Lahaina, HI fire (101 dead), the 2018 Camp, CA fire (85 dead), the 2025 Palisades, CA fire (18 dead), and the 2021 Marshall, CO fire that burned 1000 homes. The DEIS further states:

"...the Proposed Project includes emergency services being provided on-site, thereby reducing the risk associated with a single pathway."

It is misleading to suggest that on-site emergency services can reduce the risk of death from an approaching wildfire that can't be escaped because the single access road is blocked. **The DEIS should be revised to acknowledge that blockage of the single access road could have serious consequences.**

Section 4.2.1.6 Anticipated Traffic Conditions and Relationship to Wildfire Risk

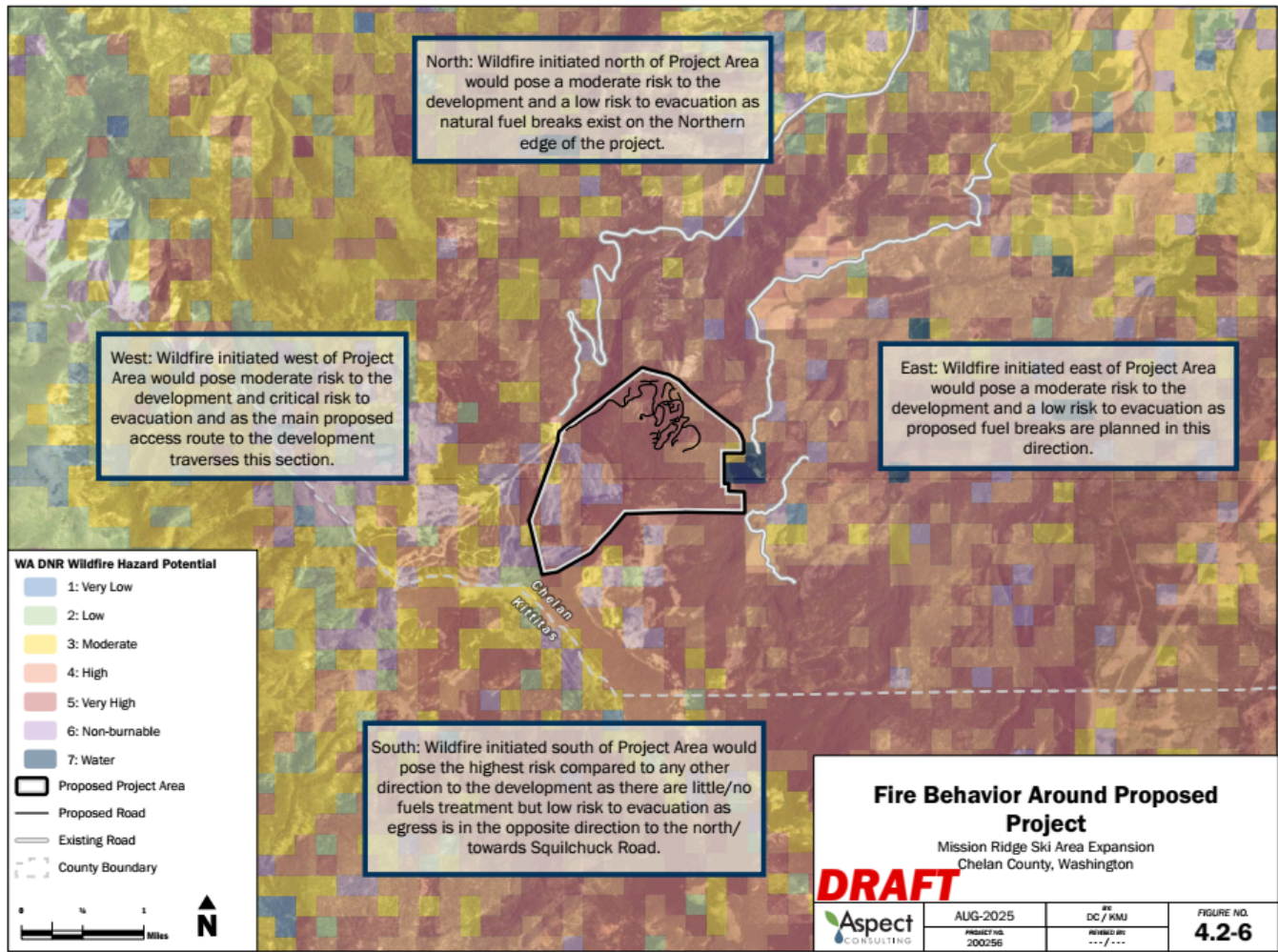
The DEIS states:

“Having more than one evacuation route provides redundancy and increased safety, particularly during unexpected or fast-moving events. Having a single wider and well-maintained access route can serve this same function under CCC.”

The first sentence is a fact. The second sentence is untrue. A single wider well-maintained access road does not provide redundancy or increased safety, and particularly not during unexpected or fast-moving events. Not only is this statement untrue, but as discussed in [Section 5.6.3.3 Direct Impacts from Operation - New Public Access Road](#), a 28 foot wide road does not meet minimum Chelan County design standards. Calling the single access road “wider”, when in fact the proposed road width is inadequate, is both persuasive and dishonest. **The DEIS should be revised to remove the persuasive and untrue statement that a single access road can provide redundancy and increased safety, and every reference to the access road as “wider” should be deleted.**

Section 4.2.2.1 Fire Behavior Around Proposed Project

The DEIS states that a fire occurring to the north of the project (downhill and towards Wenatchee) will pose “...*a moderate risk to the development and a low risk to evacuation.*” DEIS figure 4.2-6 shows the majority of land within and to the north of the project as High or Very High Wildfire Hazard Potential. A fire that starts to the north (downhill from the development) will both block the egress road, and rush uphill with elongated flame lengths (as compared to a fire moving downhill). The unsubstantiated assertion that a fire moving uphill and blocking egress poses moderate and low risk to the development requires further analysis. Similarly, the DEIS states that a wildfire approaching from the south (uphill from the development) would pose high risk to the development but “... *low risk to evacuation as egress is in the opposite direction, to the north/towards Squilchuck Road*”. This assertion ignores ember cast that throws fire forward which could ignite new fires downhill from the development thereby closing the egress, and this analysis ignores the severity of wildlife that would likely occur on the upper portion of Mission Ridge. Alexander, M.E., & Cruz, M.G. (2014). Crown fire behavior in conifer forests. [Fire Management Today, 73\(4\), 24-27. U.S. Department of Agriculture, Forest Service.](#) **The DEIS should be revised to substantiate the unlikely claim that a wildfire originating to the north of the development poses “...a moderate risk to the development and a low risk to evacuation” and that there would be “low risk to evacuation” caused by a fire approaching from the south.**



DEIS figure 4.2-6 indicating high or very high wildfire hazard potential in and north of the development and encompassing the whole of the single egress road

Section 4.2.2.2 Secondary Access - Alternative

The DEIS states:

"In response to public comments, Chelan County identified secondary access as a potential project alternative for this DEIS within the scope of "other reasonable alternatives for achieving the proposal's objectives on the same site."

Secondary access is not an alternative. It is a code requirement. [Chelan County Code section 15.30.230\(4\)](#) states:

"Secondary access is only required for projects that are projected to have more than four hundred ADT trip generation.

(A) If secondary access and/or interconnectivity are possible, then:

(i) The applicable road standard based on ADT shall apply. When the road is only for emergency purposes and is not required for circulation purposes, the applicable EVAR standard (urban or rural) shall be the minimum road standard."

The DEIS cites County requirements that are clear. Secondary access is required. However, the DEIS misreads the requirements of CCC 15.30.230 to allow construction without secondary access where secondary access is

impractical. Because this development will have more than 400 ADT trip generation, secondary access is required for this development if it is possible. The practicality standard for secondary access relied on in the DEIS is only relevant for projects with less than 400 ADT trip generation. All developments are required to establish interconnectivity unless it is not possible. CCC 15.30.230(4). When connectivity is not possible, all developments must then seek to establish secondary access, unless it is impractical. *Id.* However, separate from those requirements for all developments, secondary access is *required* for “projects that are projected to have more than four hundred ADT trip generation.” And, pursuant to CCC 15.30.230(4)(A), when secondary access is “possible” then “the applicable road standard based on ADT shall apply.” Because there is no dispute here that secondary access is possible, the project cannot move forward without it.

“As described in CCC 15.30.230(4), interconnectivity of communities is a recognized objective and priority of the County and secondary access is required for projects that are projected to have more than 400 average daily trips, a condition which the Proposed Project meets. Only in unusual circumstances shall interconnectivity not be required, with the burden of proof on the applicant. CCC 15.30.230(4).”

“Based on County Code, the default standard for the Proposed Project is to provide for secondary access; however, the Applicant is proposing to analyze secondary access and interconnectivity as impractical.”

If secondary access is possible, then it is required. To argue that it is difficult, thus impractical, thus not required, is an insincere argument that should not be entertained by the County. The International Fire Code allows that the requirement for secondary access can be waived ONLY IF the modification will not lessen life and fire safety requirements. DEIS section 4.2.1.6 states that *“Having more than one evacuation route provides redundancy and increased safety, particularly during unexpected or fast-moving events.”* Secondary access should be required by Chelan County during the permitting process. **The DEIS should be revised to include secondary access as an integral component of the project.**

International Fire Code: Modifications must not lessen life and fire safety requirements.

[A] 104.9 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.

Clip from chapter 1 Section 104.9 (Duties and Powers of the Fire Code Official) of the IFC

International Fire Code: Code official may require MORE access.

503.1.2 Additional access.



The *fire code official* is authorized to require more than one fire apparatus access road based on the potential for impairment of a single road by vehicle congestion, condition of terrain, climatic conditions or other factors that could limit access.

Section 4.2.2.2 Secondary Access - Practicality

The DEIS cites the [Aegis Engineering Secondary Access - Review of Options report](#), which accepts the conclusions of the 2022 EcoSign secondary access routes study. This study provides no engineering criteria for comparison or decision making, and simply declares all secondary access routes unreasonable and impractical. EcoSign cites the Merriam-Webster definitions of Reasonable and Practical, but provides no engineering criteria for comparison or decision making. Engineering judgements should not be based on lay dictionary definitions. The report lists an unbalanced cut volume and simply declares that value impractical. (The practicality standard for secondary access relied on in the Aegis report is only relevant for projects with less than 400 ADT trip generation.) The report notes that a route crosses land owned by others, and simply declares this as impractical. Against what values are these cut volumes compared for practicality? What effort was made to determine whether neighboring land owners would be agreeable to providing an easement for a new or improved road? The engineering report is then cited and relied upon in the draft EIS as if its conclusions are unquestionable. The report appears biased with unjustified conclusions. The conclusions of the report should be reviewed by an ethical and unbiased engineer. If the volumes listed are found to actually be unreasonable, then that conclusion should carry over to the main access road which would also then be unreasonable. If traversing land owned by others creates an unreasonable and impractical solution, then that conclusion should apply to the proposed main access road which also traverses land owned by others. The inconsistency of the application of rejection criteria gives the appearance of bias and unethical reporting by the applicant's engineer. **The DEIS should be revised to acknowledge that secondary access practicality only applies to projects with less than 400 ADT, and to provide consistency in rejection criteria between roads the developer wants to build, and those that he does not.**

Section 4.2.2.2 Secondary Access - Update Engineering Report

The bias to arbitrarily determine impracticality of secondary access roads is discussed in the section above. Another example of bias in the [Aegis Engineering Secondary Access - Review of Options report](#) is as follows: Aegis argues that not being able to completely achieve compliance with road standards is a reason to dismiss Option 1 altogether.

"...this route is shown to join an extension of Upper Wheeler Road on State-owned land. From that intersection down to Loop Road, the existing 1.65 miles of the road is unpaved and appears to involve at least one turn with an inside radius of less than 20 feet. Therefore, we find the route as presented in Option 1 would not achieve code compliance."

This argument is not in good faith. A solution that achieves the intent of the codes, but varies slightly from the codes, is better than no solution at all. The argument to discard a solution because of a single non-compliant inside turn radius (a problem with an easy engineering solution), is insincere. The insincerity is reinforced in the next paragraph of the report which argues that the County must accept "*deviations to prescribed criteria for alternative solutions to real world situations*". Although this argument would be appropriate to justify usage of the nearly code compliant Option 1 route, the creative solution Aegis proposes is to accept the firewise recommendations in their Fire Protection Report as an acceptable substitute to compliance with the secondary access requirement.

They argue to dismiss a good secondary access route because it has a non-code compliant corner, when creative engineering and design deviations could easily overcome this issue. And they also argue to completely throw out an important safety code requirement for secondary access, because they have some creative mitigating ideas in another report. These arguments are not consistent or serious. **Therefore, the report should be updated to remove bias, and the DEIS should be updated to reflect the conclusions of the revised report.**

Section 4.2.2.2 Secondary Access - Cost Considerations

The arguments against interconnectivity are ‘too much cut’ and ‘road on property owned by others’. These are not impractical obstacles. These are project challenges that the applicant is willing to address on the main access road. The secondary access road costs money. This is not a hardship factor that needs to be considered by Chelan County. The applicant wants to create a city in a remote area and there are code requirements in place to protect residents and emergency responders in such an undertaking. Secondary access is one of those requirements. The applicant has not proved unusual circumstances that would relax the requirement. In fact, the applicant has provided preliminary design for a secondary access that follows existing road alignments to the east and provides good physical separation and redundancy from a fire escape perspective. Not including secondary access as a project component in the DEIS appears to approve the request of the applicant to waive this requirement. **Since secondary access is a project requirement, and may (and should) be required by the County during the permitting process, the DEIS should be revised to include secondary access as an integral component of the project and not as an alternative. The Aegis Engineering Option 1 is the only reasonable secondary access presented, therefore Option 1 should be the route included in the DEIS.**

Section 4.2.2.2 Secondary Access - Life/Safety Improvements must be operational prior to occupancy

The land use standards sought by the developer are defined by the Master Planned Resorts Overlay District (MPR) chapter of Chelan County Code. [Section 11.89.040\(8\)](#) of the MPR code requires that all safety improvements must be installed and in operation prior to occupancy.

*(8) All required public improvements including roads, utilities and public facilities that are part of the approved site plan and narrative shall be completed prior to issuance of a certificate of occupancy by the building official or installation guaranteed by the posting of performance bonds or other surety acceptable to the prosecuting attorney in an amount of one hundred fifty percent of the estimated cost of the outstanding improvements, except that **all life/safety improvements must be installed and in operation prior to occupancy.** (Res. 2007-98 (part), 7/2/07; Res. 2001-60 (part), 4/17/01).*

The DEIS should be revised to acknowledge that the second access road must be operational prior to issuance of any occupancy permits.

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

Section 4.2.3.2 Impacts from Operation

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

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

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

Section 4.2.3.2 Impacts from Operation - Fire Hazards

This section is a representative example of the persuasive language that distracts from discussion about the impacts. The inappropriate persuasive language in this section is highlighted in orange:

“During operation, the increased number of people will increase fire hazard risk, but the reduction in fuel will reduce this risk. Increased residential units per phase is provided in Table ES-1. In contrast, the implementation of the Proposed Project would reduce the amount of area in high to very high fire risk categories by 6 acres on state lands and by 65 acres of federal lands. The activities associated with the Proposed Project on private lands would treat vegetation on 124 acres that is in the high to very high-risk categories in place of development areas such as paved roads, houses, and ski lodges. This would reduce the number of acres of high to very high fire risk categories by 28 percent in the Project Area.”

Persuasive language similar to this fills the balance of the Section 4.2.3.2 topics and will not be highlighted further in this document, but is not appropriate and should be removed.

Section 4.2.3.2 Impacts from Operation - Vegetation Treatment

The DEIS states that the probability of human-caused ignitions is low.

“In the driest years, forbs and grasses would cure and carry fire in late August and September. The potential for human-caused ignitions during this time is possible, but the probability is low, because most recreational use would occur on existing road and trail prisms”

This is misleading and not true. It is widely accepted that roughly 85% of wildfires are human caused. [Oregon Public Broadcasting](#) reports that there were 1884 wildfires in Washington State in 2023. Roughly 1600 of those were human caused. To suggest that the risk of human caused fire in a dry forest with between 300 and 4000 daily visitors newly introduced to the landscape is insincere. **The DEIS should be revised to remove this misleading statement.**

Section 4.2.3.2 Impacts from Operation - Defensible Space - Fuel Break Maintenance

The DEIS states:

“Defensible space and fuel break maintenance practices and frequency were not specified in the Fire Protection Plan (AEGIS, 2019), but Mission Ridge currently maintains a Wildfire Protection Plan (Mission Ridge, 2022b) that will be updated to reflect the new operations to include the defensible space around the residential areas and fuel breaks. As an additional mitigating condition, the Wildfire Protection Plan should be updated to outline maintenance practices and the Plan will be updated at each stage of construction to reflect current operations.”

This is not an acceptable fuel break maintenance strategy. Mission Ridge is an independent entity that runs a ski area and has no ownership or obligation to the private development. The development is owned and operated by Tamarack Saddle, LLC. According to the [project narrative](#), Tamarack will be managing the short term rentals. Tamarack owns the development property. Tamarack is not related to Mission Ridge except by the coincidence that the same person currently owns both businesses. The owner of the property may not farm out its obligations to a neighboring business. **The DEIS should be revised to acknowledge that Tamarack Saddle is a separate entity from New Mission LLC (the ski area ownership company) and to include defensible space and fuel break maintenance practices and frequency in the Fire Protection Plan.**

ii. Short Term Visitor Accommodation Overview

Dwelling units of all types may be utilized as vacation homes or short-term visitor accommodations. All short-term visitor accommodations will be managed by Tamarack or its assigns. As described in the table above, a 57-unit lodge is also proposed as part of Phase 2. This approach is consistent with Chelan County Code.

Section 4.2.3.2 Impacts from Operation - Defensible Space - MPR Fire Protection Plan Requirement

The DEIS contains several bullet points that it says must be incorporated into this MPR Fire Protection Plan including:

“Develop and maintain additional Safe Areas in strategic locations. This shall include constructing the base Lodge as a safe area and providing sufficient parking to afford one space for each dwelling unit.”

The project site plans do not show a new base lodge at the development, and the plans do not show an associated parking lot with either 886 or 1023 spaces (depending on whether hotel rooms and employee beds count as dwelling units). If this requirement is to be enforced, then **the DEIS should be revised to show the new base lodge and the safe area parking on the project maps. These project elements should be listed as a condition of approval on permits, and should be included in the Mitigation section of chapter 4.2 of the DEIS.**

Land Use	#Units/SF
Single Family (Detached)	265 Units
Apartments	621 Units
Resort Hotel	57 Rooms
Snow Ski Area	4 Lifts
Shopping Center ³	110,000 SF
Employee Housing	80 Units
TOTAL	

Snip from 2025 TIA showing total number of dwelling units

Section 4.2.3.2 Impacts from Operation - Fire Protection

The DEIS states:

“Mission Ridge has a Crisis Action Plan and a Wildfire plan in place. The Crisis Action Plan accounts for a variety of emergency procedures including weather, avalanche, earthquake, and fire emergencies.

The Wildfire Protection Plan is a proactive fire management program that both applies fire prevention and hazardous fuel reduction techniques and minimizes damages from wildfires. The current plan is active for their existing operations, which are for primarily winter sports with limited motorized vehicle use in paved and improved areas. This plan will be updated for the new summer operations and will be submitted to Chelan County for approval.”

This is not an acceptable fire safety strategy. Mission Ridge is an independent entity that runs a ski area and has no ownership or obligation to the private development. The development is owned and operated by Tamarack Saddle, LLC. Tamarack is not related to Mission Ridge except by the coincidence that the same person owns both businesses. The owner of the property may not farm out its obligations to a neighboring business. Mission Ridge’s staff, policies and readiness to respond to an emergency are inadequate as a plan for an un-related business, Tamarack Saddle LLC. Since fire protection is a safety

issue, planning for emergency response must be the responsibility of the development (not a neighboring business). **The DEIS should be revised to clarify that the development needs its own Crisis Action Plan and Wildfire Protection Plan and cannot rely on cooperation with a separate entity.**

Section 4.2.3.2 Impacts from Operation - Fire Protection

The DEIS states:

"The Fire Protection Plan proposes the strategies for reliable fire sprinklers, fire alarms, fire extinguishers, key boxes, and emergency escape. The full description is included in the Fire Protection Plan".

Although the DEIS does not specifically discuss the reduced fire flows requested in the Fire Protection Plan, the [Aegis Fire Protection Plan](#) argues not to conform to applicable requirements of the IFC, and instead asks that the Fire Marshall allow exceptions to reduce ingress/egress and fire flow requirements.

Both IBC and IFC provisions accommodate such conditions, providing for modification of code requirements in Section 104.10 and 104.8, respectively. The IFC authorizes the fire code official to grant modifications for individual cases when, "special individual reason makes the strict letter of the code impractical, the modification is in compliance with the intent and purpose of the code and that such modification does not lessen health, life and fire safety requirements."

Modification of fire flow is specifically provided for in CCC Section 15.40.040(2)(A), "for isolated buildings or a group of buildings in rural areas or small communities where the development of full fire-flow requirements is impractical."

Clip from Aegis Engineering Fire Protection Plan

[IFC section 104.9](#) allows reduction in fire-flow when "... such modification does not lessen health, life and fire safety requirements." **The DEIS should be revised to acknowledge that the application materials suggest lower fire flow requirements and that relaxing the code would lessen life and fire safety and would therefore be a code violation.**

Section 4.2.3.2 Impacts from Operation - Emergency Access - Single Access

The DEIS states:

"The increase in traffic to the Proposed Project area will have an impact on emergency access through Squilchuck Road and the new proposed road to the development. Due to the remote location and extreme topography, the applicant proposed to maintain an access road of at least 28 feet width to meet Chelan County Code 15.30.230(4)".

A single access road is unacceptable. Secondary access requirements are discussed in [section 4.2.2.2 Secondary Access](#). Secondary access is required. Not only is single access unacceptable, but as discussed in [Section 5.6.3.3 Direct Impacts from Operation - New Public Access Road](#), the applicant proposed 28 foot wide road does not meet minimum Chelan County design standards. Calling the single access road "wider", when in fact the proposed road width is inadequate, is both persuasive and dishonest. **The DEIS should be revised to include study of the impacts of secondary access, and every reference to the access road as "wider" should be deleted..**

Section 4.2.3.2 Impacts from Operation - Emergency Access - Fire Station

The DEIS states:

"Additionally, an annexed fire station would be staffed by a volunteer fire fighting team to complement coverage provided by CCFD1 to provide local immediate emergency response to any fire emergencies.

This is misleading. CCFD1 has indicated that a fire station is required not to complement other coverage, but to provide primary and exclusive coverage to the development. They have also stated in their 2020 [comment letter](#) that the proposed location for a future fire station sharing space with the Ski Maintenance Facility cannot be accepted.

The SEPA Checklist fails to discuss the need to increase facilities except that a possible location for a future fire station was identified on a site plan. However, Page 9a of the Resort Base and Real Estate Schematic shows the District sharing the location of the fire station with a Ski Maintenance Facility, which the District cannot accept as it does not incorporate the minimum facilities required by the District. The location of the proposed fire station is just one example of why the Developer must engage in more substantive discussions with the District to address these shortcomings in the SEPA Checklist and current application materials with respect to EMS and fire protection services.

Clip from page 5 of CCFD #1 Fire Chief, Brian Brett's March 30, 2020 [comment letter](#) to Chelan County

The applicant has indicated that the fire station is to be built using County (not development) dollars and would be installed "...at the discretion of the fire district..." Table ii, Development Standards from Section Q. Chelan County Code Requirements of the [project narrative](#) quotes:

"Please note that the revised site plans show a volunteer fire station in Area 22 as part of enhanced fire protection. We are proposing to annex into the CCFD1. The fire station would be built at the discretion of the fire district when it is determined there is a need."

In addition, according to CCFD #1 Fire Chief, Brian Brett's March 30, 2020 [comment letter](#) to Chelan County:

"The application materials suggest the District will staff the station dedicated to serve the Project with volunteer firefighters. However, the Developer performed no analysis of how the District will recruit these volunteers or what contingencies the Developer has if the District cannot secure these volunteers. The District currently has little capacity to recruit and retain volunteers, which presents challenges, especially during the initial build-out of the Project".

This Fire District comment is from 2020, yet no change to the plan has been made and the DEIS is stating as fact that Chelan County Fire District will build and staff, at their expense, a volunteer fire station. **The DEIS should be revised to include consultation with CCFD#1 with workable solutions that include the agreement of the Fire District and costs borne by the developer.**

Section 4.2.3.2 Impacts from Operation - Emergency Access - CCFD1 Requirements

The DEIS states:

"Mitigation measures related to emergency access proposed by the applicant in consultation with CCFD1 are listed below:

- *Space for a future CCFD1 station is designated with the Ski Operations and Maintenance area along the main MRE access road.*
- *Thinning and fuel reduction buffer along the single-access road as requested by CCFD1 (CCFD1, 2022). An example provided by CCFD1 presents a 100-foot buffer where slopes are accessible based on USFS or WA DNR guidelines for thinning and fuel reduction".*

This is misleading. It suggests to the reader that the project has complied with mitigation measures suggested by CCFD#1 during consultation. This is not true. The only consultation accomplished since 2020 has been the publication of Fire Chief Brian Brett's March 30, 2020 [comment letter](#). The letter makes several recommendations including:

- A. The developer has not yet submitted a petition for annexation or engaged in any substantial negotiations with the District for a service agreement
- B. The developer must bear the cost of government service extensions, and include an inventory of location and capacity of all existing fire protection and other emergency services. The developer has not engaged the District to provide this analysis.

- C. The developer has not provided an analysis of the District's ability to provide fire and emergency response to the Project.
- D. The developer has not analyzed the capital and operational requirements for service to the Project.
- E. The developer has not reviewed the District's ability to meet the level of service requirements for fire and BLS response, not only to the project, but to all the residents and taxpayers of the District after development of the project is complete
- F. The offered fire station location shared with the Ski Maintenance Facility does not incorporate the minimum facilities required by the District
- G. The developer has offered space for a station, but has not committed to paying for the costs to construct a new station or its required apparatus
- H. The Fire Protection Plan is in error where it indicates that the District has three helicopters to support fire protection at the Project.
- I. The developer suggests the new fire station will be staffed by volunteers, but the District requires both volunteers and paid firefighters and EMTs to serve the development
- J. The entire District, as well as the Expansion Area, is classified as an embercast zone and the long history of serious wildfires must be considered in the analysis of adequate fire protection and BLS services for the Project.
- K. The future tax revenue from the project will not offset the initial investment required to provide adequate facilities and staffing to service the Expansion Area. The District does not have sufficient funds to subsidize the Project's increased demands on its services.

The DEIS should be revised to analyze the issues discussed in the March 30, 2020 CCFD#1 comment letter.

Section 4.2.3.2 Impacts from Operation - Summary of Impacts from Operations

The entirety of the summary of 7 pages of Impacts from Operations follows:

In summary, there are probable significant adverse operations-related impacts from increased human activity during high fire-risk summer season and additional traffic on access roads from the Proposed Project. These impacts can be partially mitigated for as described in Section 4.2.3.3.

This is an inadequate summary of impacts as not a single impact is listed. **The DEIS should be revised to provide an actual summary of impacts from operation.**

Section 4.2.3.3 Proposed Mitigation Measures - Additional Applicant Proposed Mitigation Measures - Egress during Wildfire Season - Single Access

The DEIS indicates that primary access will be along Mission Ridge Road with Primary shelter-in-place at homes, buildings and in the Mission Ridge parking lot (one mile from the development) where "evacuation is not required". If the Mission Ridge Road is blocked by fire or accident, the DEIS suggests shelter in place at Mission Ridge, or possibly hike through the forest to safety. Each of these is problematic:

When evacuation is required:

- *Primary egress will remain along Mission Ridge Road.*

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

4.2.3.3 Proposed Mitigation Measures - Additional Applicant Proposed Mitigation Measures - Egress during Wildfire Season - Tamarack duty

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

This plan requires a separate entity, Mission Ridge, to be responsible for Tamarack Saddle safety. Mission Ridge is an independent entity that runs a ski area and has no ownership or obligation to the private development. The development is owned and operated by Tamarack Saddle, LLC. According to the [project narrative](#), Tamarack will be managing the short term rentals. Tamarack owns the development property. Tamarack is not related to Mission Ridge except by the coincidence that the same person currently owns both businesses. The owner of the property may not farm out its obligations to a neighboring business. **The DEIS should be revised to acknowledge that Tamarack Saddle is a separate entity from New Mission LLC (the ski area ownership company) and to include coordination with EMS in its own Crisis Action Plan.**

ii. Short Term Visitor Accommodation Overview

Dwelling units of all types may be utilized as vacation homes or short-term visitor accommodations. [All short-term visitor accommodations will be managed by Tamarack](#) or its assigns. As described in the table above, a 57-unit lodge is also proposed as part of Phase 2. This approach is consistent with Chelan County Code.

Clip from the Section B, Project Overview, from the 2022 Revised Project Narrative

Section 4.2.3.3 Proposed Mitigation Measures - Additional Applicant Proposed Mitigation Measures - Egress during Wildfire Season - Shelter-in-Place

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

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

Section 4.2.3.3 Proposed Mitigation Measures - Additional Applicant Proposed Mitigation Measures - Egress during Wildfire Season - Evacuation

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

The DEIS indicates that there are existing unimproved roads that exit the development to other locations. One of these is [Aegis Engineering Secondary Access Road Option Number 1](#) which is currently already driveable by pick-up and even logging trucks from the Upper Wheeler Road to the development property. The inclusion of this road as an additional proposed mitigation measure to situations where the Mission Ridge road is impassible and evacuation is necessary bolsters the argument that secondary access is necessary and reasonable. If, in their unimproved condition, these roads are adequate for evacuation by development residents, then with some improvements, these roads are reasonable secondary access routes. See section [Section 4.2.2.2 Secondary Access](#) for a full discussion of secondary access. **The DEIS should be revised to include the existing unimproved road option 1 as secondary access.**

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

Section 4.2.3.3 Proposed Mitigation Measures - Additional Applicant Proposed Mitigation Measures - Egress during Wildfire Season - Summary

None of the evacuation discussion in Section 4.2.3.3 is mitigation. It is a persuasive description of options that the developer is willing to present as evacuation or shelter-in-place locations. Omission of secondary access, shelter in place in locations not analyzed to be safe, suggesting evacuation by car along existing roads that the developer has declared impractical for secondary egress, suggesting evacuation by foot along trails through the forest, are all irresponsible safety suggestions, inconsistent with arguments made elsewhere in the DEIS, and do not belong in the mitigation section of the Fire Risk chapter of the DEIS. **The DEIS should be revised to include secondary egress, remove suggestions of unsafe egress strategies, and to provide analysis of the Mission Ridge Parking lot, the proposed remote day-use lot, and the homes and buildings that are presented without evidence as safe zones.**

Section 4.3 - Visual

Section 4.3.3.1 Impacts from Construction - Light and Glare

The Light and Glare section contains no quantitative measurements and instead relies on unverified assumptions about new lighting fixtures that are not documented in any inventory. To generate reliable data on potential light and glare impacts, the applicant must provide a detailed inventory of current and proposed lighting. This inventory should cover: Ski run lighting, commercial structure fixtures, residential structure fixtures, roadway luminaires, and parking lot luminaires. Without a complete inventory, projections of increased skyglow and true effects of the proposed expansion cannot be independently replicated or validated. The existing analysis is based solely on applicant-provided images that have not undergone peer review, undermining its scientific credibility. In addition, the DEIS claims:

“Since construction is temporary in nature, the impacts to nighttime views from additional light and glare would not post a significant impact in the long-term...Therefore, given the temporary nature of impacts and with proper construction-related mitigating conditions, there would not be probable significant adverse construction-related impacts on light and glare from the Proposed Project.

To disregard an impact because it is temporary is insincere when the temporary nature of the impact is expected to last twenty years. The DEIS should be revised to inventory current and proposed lighting and to delete the misleading premise and conclusion that the impact is temporary and therefore not significant.

Section 4.3.3.2 Impacts from Operation - Building Height

The DEIS states that:

“The tallest building height will be approximately 45 feet...”

Building height limits in the base zones are limited to 35 feet. CCC 11.89.50(5). The developer proposes to exceed that limit, but proposes no explanation for why they cannot comply with it. **Without establishing that they cannot comply with the building height limitation, the DEIS should clarify that the hearing examiner should not approve such a variance.**

Section 4.3.3.2 Impacts from Operation - Light and Glare - Sky View

The DEIS states:

“The residential viewers at KOPs 2 and 3 would see a reduction in night sky views and a significant addition to light source on the mountainside where originally there was no light and have a negative impact on the night sky visibility.”

While the DEIS acknowledges the negative impact of added lighting on astronomy and night sky aesthetic, it omits impacts on local forests where camping and outdoor education occur. National Forest lands in the vicinity of the expansion support overnight visitors whose mood and scenic evaluations decline as light pollution increases (NPS, 2017). A recent study across State and National Parks found that 62 percent of nighttime campers engage in dark-sky-dependent activities (Beeco, 2023). Although only 2–5 percent of visitors specialize in night-dependent recreation, many others rely on a naturally dark sky for a high-quality outdoor experience (Beeco, 2023).

The Manastash Ridge Observatory, home to a 30-inch research telescope and a training site for undergraduates, will experience noticeable skyglow increases. Worldwide observatories face similar challenges from permanent installations and sprawl around them. Light emitted from this expansion will spread beyond Mission Ridge, contributing to skyglow observed as far away as Methow Valley in which the skyglow currently reaches.

The DEIS fails to address documented effects of light pollution on wildlife. Migratory mule deer may alter their routes, cougars could change nocturnal hunting tactics, and salmonid navigation and predation rates can shift in response to artificial light. Migratory birds using the Pacific Flyway also suffer increased collision risk under bright skies. None of these ecological impacts are examined in the current DEIS.

The DEIS minimizes the effects of light pollution to tangible issues and focuses solely on non-tangibles such as aesthetics as a negative and safety as a positive tangible outcome. **The DEIS should be revised to include a comprehensive analysis of light pollution impacts including safety risks, recreational impacts, and ecological consequences.**

Section 4.3.3.2 Impacts from Operation - Light and Glare - Driver Safety

The DEIS states:

"The additional nighttime light from KOPs 4 and 5 would have a positive impact for safety and accessibility for drivers and visitors to the resort as visibility would increase..."

This is not true. If the additional nighttime glow at KOP 1 and KOP 4 is indeed skyglow, it will not improve safety for drivers or visitors. High levels of skyglow create a distracting halo that may reduce roadway safety. White light scattering by aerosols increases fog reflectivity, further degrading visibility under low-visibility conditions. **The DEIS should be revised to remove the untrue statement that additional nighttime light will improve driver safety.**

Section 4.3.3.3 Proposed Mitigation Measures

The DEIS cites the following mitigation measure:

"Where possible, down shade lighting will be used to control light and glare impacts from the site."

CCC 11.88.080 requires that all exterior lighting "shall be low-intensity, nonflashing and designed to project toward the property." It is clear that many of the resort's lights, including night ski lights will not comply with this. The DEIS vaguely states that they will comply with this criterion "where possible," which is basically an open admission that they will not fully comply with this mandatory requirement.

The DEIS cites Chelan County Code 11.88.08 as the sole mitigation strategy for addressing light pollution, stating:

"The applicant proposes that light and glare impacts will be mitigated where possible through the requirements of CCC 11.88.08. This includes requirements that parking lot lights, security lights, or any exterior lighting shall be low-intensity, non-flashing and designed to project toward the property or shall be shielded to keep light from directly projecting over property lines."

This reliance on CCC 11.88.08 reflects a minimalist approach to mitigation, offering regulatory compliance, not ecological stewardship. The county code provides a baseline, not a comprehensive standard for protecting nocturnal environments or visual landscapes. To uphold Mission Ridge's "strong sense of place" and safeguard its identity as a forested mountain landscape, additional mitigation strategies must be implemented. Regulatory minimums are insufficient in the face of ongoing expansion. According to a [2022 NCW Life article](#), the resort promotes its elevated lighting impact as a feature.

"On clear nights, you'll have one of the most amazing night views in the state," the resort posted on social media. From the summit, you will see the city lights of Ellensburg to Ephrata and many points further in all directions.

The article reports that the added night skiing terrain will be a 78 percent increase over last season. This article illustrates the resort's expanding light footprint, and the valley-wide visibility of its glare. This expansion not only alters the natural character of the region, but it also actively contributes to the erosion of its nocturnal integrity. Without meaningful policy restraints, Mission Ridge's light pollution will persist and compound ultimately resulting in the loss of the natural night sky in the Wenatchee Valley.

Prior to expansion approval, the following measures should be incorporated into a Light Management Inventory and Plan that reflects the best modern practices in dark sky protection.

Residential and Commercial Zones

- Restrict lighting for the sole purpose of wayfinding and safety.
- Require full cutoff/fully shielded fixtures; maximum color temperature of 2800K.
- The use of "Dark Sky Approved" lighting
- Enforce timer- or motion-activated lighting systems.
- Apply curfews with smart controls to reduce lumen output by 75% during non-active hours.
- Establish a maximum lumen-per-acre threshold.
- Prohibit all uplighting and landscape illumination.
- Ensure overhang-mounted fixtures meet shielding and output requirements.

Ski Run and Operational Zones

- Utilize lower Kelvin fixtures to minimize glare and atmospheric scattering.
- Implement a lighting curfew; exceptions granted only for limited special events.
- Limit the number of operating lights at any one time to pre-expansion standards and rotate night skiing operating runs.
- Adopt ecologically sensitive technologies such as Sno-Brite systems.
- Cap special events to a defined annual count with strict time limits.

These enhanced measures present Mission Ridge with a pivotal opportunity to pursue growth while reducing its light pollution footprint. A formal light management plan would signal a deeper commitment to community values, ecosystem preservation, and stewardship of the night sky. Given snow's high albedo, even modest illumination dramatically intensifies glare and uplight. By lowering fixture intensity, reducing color temperatures, and scheduling operations responsibly, Mission Ridge can contribute meaningfully to the protection of the Wenatchee Valley's nightscape. **The DEIS should be revised to include mitigation measures as described above that are beyond the bare minimum required by code.**

Section 4.4 - Land and Shoreline Use

Section 4.4.1 Land and Shoreline Use Overview

- **Existing and Proposed Land Ownership and Land Uses**

The DEIS states:

"There is also a gated, administrative access road originating from the existing parking area that is used by project surveyors and recreational snowshoers, skiers, and hikers"

This is a mischaracterization of the road that starts near the east end of the third lot and roughly contours East toward the private property. The road is an out of compliance temporary road (less than 1 year). In 2018, Mission Ridge received a decision memo to create a one-year temporary road. Mission Ridge, however, went ahead without a Special Use Permit and carved the road. In the process, they did not follow any of the guidance outlined in the decision memo. The now seven-year-old road continues to negatively impact the forest with invasive weeds, erosion, and increased disturbance

to wildlife from high human use of the road. Section 4.4.3.7, Proposed Mitigation Measures, discusses the [violations of the 2017 temporary road requirements](#). **The DEIS should be revised to omit the mischaracterizing language “administrative road”.**

- **WDFW and DNR Land Exchange**

Section 25 is owned by WDFW and was purchased in 1953 with funds from the Federal Aid to Wildlife Restoration Act of 1937. Section 25 includes the upper half of Chair 4, Windy Ridge, Bowl 4, and overlaps with the proposed project. Hunters still use the section during archery and rifle seasons as well as for forest grouse hunting. Section 25 contains many WDFW Priority Habitats and Species, and its cool, north-facing slopes are unique, providing crucial wildlife habitat on Mission Ridge. [Recent trail camera footage](#) from Section 25 shows that mule deer, Colockum elk, golden eagles, pika, marmots, bobcats, mountain lions, coyotes, and black bears regularly use the section's wildlife corridors. Footage of an immature golden eagle bathing in an elk wallow suggests that the cliffs of Section 25 may harbor an active golden eagle nest. Footage of a goshawk, also bathing in an elk wallow, paired with audio observations, indicates a nearby nesting pair. Newborn mule deer fawns and elk calves seen in nearby trail camera footage show that the area is important for fawning and calving. Section 25's whitebark pine forests, springs and wetlands, talus slopes, and undisturbed shrub-steppe openings are vital wildlife habitats. The value of this section, first identified when the parcel was purchased with Pittman-Robertson funds, has become even more important today as development threatens to destroy similar habitats on adjacent parcels.

Elyse Woodruff, WDFW Property Management Supervisor, wrote in her [November 6, 2020, letter to USFWS](#), *“new year-round uses of the ski area and proposed new development on adjacent private land have us concerned that WDFW’s 780 acres will no longer be able to meet the objectives for which they were purchased. Human presence in the area will soon become all season with motorized recreational vehicles and summer sports.”* The DEIS states that WDFW has indicated that:

“...an expanded, year-round ski resort is not an allowable use of the land under the U.S. Fish and Wildlife Service (USFWS) contract that funded WDFW’s purchase of the property.”

The DEIS discusses a land exchange between WDFW and Washington State DNR that would result in DNR owning Section 25 and implying that an expanded year-round resort would be allowable on DNR owned Section 25. A land exchange would rob wildlife of important habitat and violate provisions of the law. Real property acquired with Wildlife Restoration funds must serve the purpose of the grant program for which the funds were provided for the duration of its useful life. [CFR50 section 80.134](#) states that (a) *If a grant funds acquisition of an interest in a parcel of land or water, the State fish and wildlife agency must use it for the purpose authorized in the grant. And (b) If a grant funds construction of a capital improvement, the agency must use the capital improvement for the purpose authorized in the grant during the useful life of the capital improvement”.*

Should discussion of the land exchange be continued, then **the DEIS should be revised to examine the irreversible harm to wildlife that would occur should this land exchange be completed and assess whether the further development is contingent on the land exchange. The land exchange should not occur, and the jurisdictions should respect WDFW’s assertion that “an expanded, year-round ski resort is not an allowable use of the land under the U.S. Fish and Wildlife Service (USFWS) contract that funded WDFW’s purchase of the property”.**

However, the DEIS further states that:

“The land swap is not part of the current Proposed Project”

With the land exchange not on the table, and DFW indicating that expanded ski resort activity is not an allowable use of Section 25, **the DEIS should be revised to modify the proposal to exclude section 25 from any expanded ski resort or development activity.**

Section 4.4.3 Findings for the Proposed Project

4.4.3.2 Impacts from Operation -

The following DEIS discussions on how the project fits within the community vision documents are insincere and misleading. The DEIS cherry picks specific goals of the documents to show agreement, but ignores global violations. The language is persuasive and is not appropriate for a scientific study. In the following paragraphs, quotes from the *DEIS* are in grey italic, and commentary is in blue.

- **4.4.3.2 Impacts from Operation - Zoning, Planning, and Policy Consistency**

The DEIS states:

EIS scoping comments expressed concern that the proposed project may conflict with the principles of the Stemilt Partnership, which was formed to “keep future development from damaging the water, wildlife, and recreation of the upper Stemilt Basin.”

This statement is misleading because it omits the main motivation of the formation of the Stemilt Partnership. Chelan County organized and created the Stemilt Partnership in 2007 to prevent urban development in sections 16, 22, 20, and 28 in the upper Stemilt Basin. Chelan County also purchased 2500 acres of land in 2012 for the express purpose of preventing urban development in the upper basin. (Source, Chelan County website). While protecting water, wildlife and recreation are stated goals of the partnership, the main plan to accomplish those goals was and is to prevent development similar to the Mission project.

In direct conflict with the formative goal and core belief of the Stemilt Partnership, the proposal is urban development in the upper basin. It is proposed in a section ADJACENT to one of the sections that motivated the formation of the partnership. In addition to the fundamental insult of urban development in the forest, the proposal violates all three tenets of the mission of the partnership by removing water from the watershed, disrupting wildlife, and degrading the recreational experiences in the upper basin. The development is clearly not consistent with the goals of the Stemilt Partnership.

- **4.4.3.2 Impacts from Operation - Chelan County Comprehensive Plan**

The DEIS states:

Table 4.4-1... summarizes the Proposed Project’s consistency with applicable Chelan County Comprehensive Plan and supporting plan goals and policies. The proposed project would be consistent with these goals and policies.

Although there exist comprehensive plan goals and policies that are consistent with the proposed development, cherry picking and citing only those in agreement is dishonest. The proposal violates the overall intent and several policies in the Comprehensive Plan. Several examples of disagreement with the Comprehensive Plan follow:

A. CHELAN COUNTY COMPREHENSIVE PLAN – CHAPTER 1: INTRODUCTION – SECTION IV. COMMUNITY VISION STATEMENTS

Chapter 1 of the December 2017 Chelan County Comprehensive Plan contains vision statements for the various planning areas. The vision statement of the Malaga-Stemilt-Squilchuck planning area states “*The citizens of the Malaga-Stemilt-Squilchuck Study Area believe that their **greatest asset is the rural character** of the community... The citizens of the Malaga-Stemilt-Squilchuck Study Area envision future development that will complement and enhance, and **not unreasonably impact, our rural character, our strong agricultural economy, and natural resource based industries...**We envision that the expansion of our existing residential, commercial and industrial land uses will take place in those areas **already characterized by that type of use...** In recognition of the importance of **preservation of existing water***

*rights and future need for water for our community and its agricultural base; we foresee the continued support, development and expansion, and **maintenance of water supplies and their associated sources.** In conclusion we envision growth that will **maintain the continuity of our rural character and quality of life** while protecting the private property rights of the citizens of this area."*

In direct opposition to each of these values, the proposed multi-family residential and commercial development unreasonably impacts the rural character and quality of life for the residents of the Squilchuck Drainage. It also impacts the ski area itself, which is beloved for its hometown hill vibe. Changes to the ski area that destroy this vibe will impact the broader Chelan County community as well.

- According to the [Traffic Impact Analysis \(TIA\) in appendix I](#), the development will increase traffic on Squilchuck Road to level of service D (characterized by noticeable percent time spent following other vehicles, most vehicles travelling in platoons, near zero passing capacity, noticeably curtailed speeds, drivers experiencing a generally poor level of comfort, and with long delays at intersections) which is certainly not consistent with the rural character cited as the greatest asset of the area. Residents of the Squilchuck valley who live along the Squilchuck Road will have to tolerate roughly 10,000 cars passing per day with roughly a thousand cars in each direction per hour at peak hour in the evening. The proposed condition would bring the feel of living next to a freeway, which, in violation of the vision statement, unreasonably impacts the rural character currently enjoyed by Squilchuck homeowners.

Table 3: Total Trip Generation Summary

Land Use	#Units/SF	Average Daily Trips (ADTs)	PM Peak-Hour			Saturday ADTs	Saturday PM Peak-Hour		
			In	Out	Total		In	Out	Total
Single Family (Detached)	265 Units	2,473	156	92	248	2,471	129	109	238
Apartments	621 Units	4,056	181	107	288	2,826	161	94	255
Resort Hotel	57 Rooms	316	10	13	23	280	10	13	23
Snow Ski Area	4 Lifts	1,410	16	119	135	3,659	85	220	305
Shopping Center ³	110,000 SF	1,114	41	45	86	1,338	54	49	103
Employee Housing	80 Units	286	10	9	19	192	9	7	16
TOTAL		9,655	414	385	799	10,766	448	492	940

The Development has been analyzed to generate 9,655 new weekday ADTs with 799 new weekday PM peak-hour trips. The Development is anticipated to generate 10,766 Saturday ADTs with 940 Saturday PM

Table 3 - 2025 Kimley Horn Traffic Impact Analysis

Table 13: 2043 Squilchuck Road HCM Calculations

Factor	Feb. Weekday 2023 Count		Feb. Saturday 2023 Count	
	Northbound	Southbound	Northbound	Southbound
PM Peak-Hour Existing Volume [veh/hr]	271	194	349	128
2043 With Development Volume [veh/hr]	761	694	966	621
Peak-Hour Factor (PHF)	0.86	0.87	0.85	0.83
Heavy Vehicle Factor	3.7	0.9	0.9	0.9
FgPTSF	1	1	1	1
Et	1	2.9	1	3.1
Passenger Car Equivalent [pc/hr]	880	810	1140	760
Estimated PTSF [%] ⁴	72%	78%	78%	68%
LOS⁵	D	D	D	C

Table 13 - 2025 Kimley Horn Traffic Impact Analysis

- The development is urban in nature, with nearly a thousand units plus commercial space, and is proposed in an area currently characterized as wild open country. This is contrary to the vision statement that “...*expansion of our existing residential, commercial and industrial land uses will take place in those areas already characterized by that type of use*”.
- The development literally doubles the population of the four basin area known as the WRIA-40A management area. The current population for the Stemilt, Squilchuck, Malaga, Wenatchee Heights basins is in the neighborhood of 3,800. After buildout, with 4,000 people and up to 7812 pillows at the head of the Squilchuck Creek, the basin population will be twice the current level.
- Instead of protecting the source of the water supply, the development steals from the aquifer that feeds the base flow of Squilchuck Creek.

The rural character of the Squilchuck canyon cannot survive 10,000 average daily trips and a population increase of roughly 4,000 people. The valley will become something other than Rural, and that is clearly not consistent with the vision statements of the 2017 Comprehensive Plan.

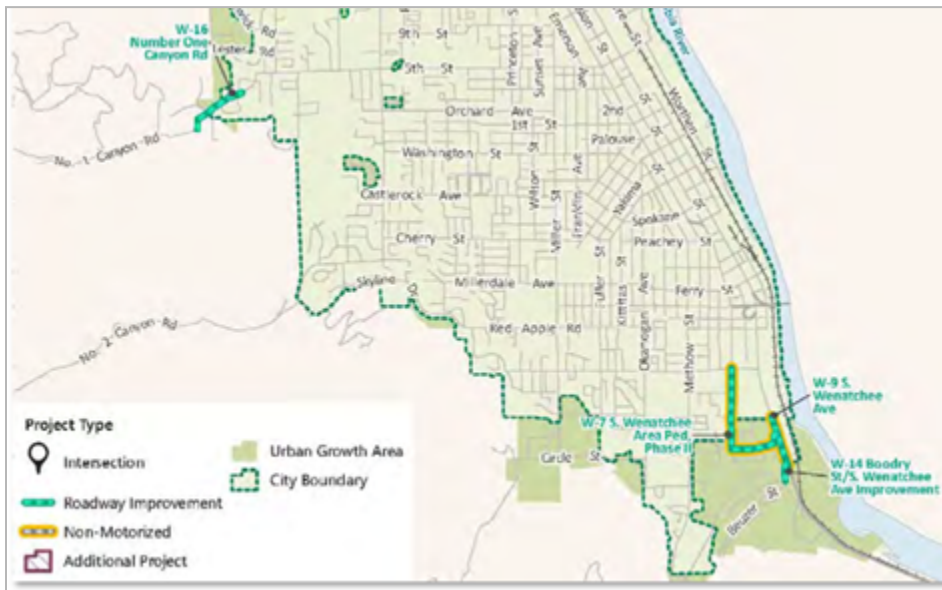
B. CHELAN COUNTY COMPREHENSIVE PLAN – CHAPTER 2: LAND USE ELEMENT – SECTION III. REGIONS/COMMUNITY OVERVIEWS

Chapter III. Regions/Community Overviews, of the Land Use Element of the Comprehensive Plan discusses the rural character of the basins and says “*Future development and clustering would be compatible when developed in a manner which reduces road cuts and visual impacts...*” The proposal includes a 28-foot-wide road which will be cut into a hill that slopes to 70 degrees. The road cut will be terrific in size, as will its visual impact. Given the steepness of the slope, the road cut will potentially run hundreds of feet up the hill. In addition, the resort will be an eyesore, visible from Quincy to Entiat with a restaurant perched atop the Squilchuck Cliffs. It will also create night sky light pollution that will spoil the alpine feel of the upper end of the Squilchuck Canyon. This is clearly not consistent with the development guidance of Chapter 2 of the Comprehensive Plan to reduce road cuts and visual impacts.

C. CHELAN COUNTY COMPREHENSIVE PLAN – CHAPTER 2: LAND USE ELEMENT – SECTION V. GOALS AND POLICIES FOR LAND USE – LU 1.4

Chapter V. Goals and Policies for Land Uses, of the Land Use Element of the Comprehensive Plan contains Land Use goal LU 1.4, which requires that new residential developments which require urban services and utilities must be located within the urban growth boundary. The proposed development will require a fire station, PUD power and water. The development will require an additional mile of snow

removal and will require waste management. These are urban services and the development are remote from the Wenatchee Urban Growth Area.



Urban Growth Area from Figure 26. Twenty Year Projects – From Chelan County Comprehensive Plan – Note that the UGA does not extend up Squilchuck Road

This goal is supported by the findings of the September 2008 Stemilt-Squilchuck Community Vision report published by the Trust for Public Land in partnership with the Stemilt Partnership which finds that high-density development should connect with existing urban areas.

Major Findings

- Development in the basin is mostly dispersed residential and agricultural development; not a lot of commercial development;
- Future development in the upper basins should emphasize public access and some recreational opportunities. Higher-density development should occur in lower canyons, stretching from existing urban areas;

Excerpt from the Stemilt-Squilchuck Community Vision Report

The development is not consistent with Land Use Goal LU 1.4 because it is located outside the UGA and requires urban services.

D. CHELAN COUNTY COMPREHENSIVE PLAN – CHAPTER 2: LAND USE ELEMENT – SECTION V. GOALS AND POLICIES FOR LAND USE – LU 1.6

Chapter V. Goals and Policies for Land Uses, of the Land Use Element of the Comprehensive Plan contains Land Use goal LU 1.6, which requires that environmental limitations, availability of infrastructure and consistency with the Comprehensive Plan be considered.

Policy LU 1.6: Consider environmental limitation, availability of infrastructure and consistency with the Comprehensive Plan and the Growth Management Act when establishing residential density standards.

Rationale: Physical characteristics and the availability of utilities are important factors in determining residential development patterns and densities. In addition, residential densities must be consistent with the guidance of the comprehensive plan and the requirements of the Act.

Snip from Chelan County Comprehensive Plan

This development invites environmental disaster, bringing nearly 1,000 units into a hazardous wildfire trap, increasing recreational demand to the upper basin, introducing domestic waste from a population of 4,000 through dispersed drain fields, and cutting a highway-width road across steep forested land adjacent to administratively withdrawn (protected) areas. The infrastructure to accommodate this development does not exist, and creating it will bring additional impacts and environmental harm.

The comprehensive plan does not account for the massive and rapid population increase that will follow development. The growth is inconsistent with the Growth Management Act's guidance to require urban growth inside the boundary of the UGA. The proposal is clearly not consistent with Land Use Goal LU 1.6.

E. CHELAN COUNTY COMPREHENSIVE PLAN – CHAPTER 2: LAND USE ELEMENT – SECTION V. GOALS AND POLICIES FOR LAND USE – LU 3

Chapter V. Goals and Policies for Land Uses, of the Land Use Element of the Comprehensive Plan contains Land Use goal LU 3, which is to protect water quality and quantity. The proposal suggests removing water from deep aquifers which are hydraulically connected to surface water. There is no water available for allocation to this development. The entire wintertime flow of Squilchuck Creek is allocated by existing water rights to Beehive Irrigation District and Mission Ridge for diversion and storage in their respective reservoirs. Existing water rights in the 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. In fact, Beehive Irrigation's Miller water rights have been cut in 10 of the 11 past irrigation seasons.

Year	Miller Cut
2025	75%
2024	50%
2023	50%
2022	25%
2021	75%
2020	50%
2019	25%
2018	25%
2017	0%
2016	25%
2015	50%

Percent curtailment for Squilchuck-Miller Water Users for last decade. Data from Beehive Irrigation District.



July 2025 senior irrigation water rights cut 50% August 2025 senior irrigation water rights cut 75%

This is supported by statements and conclusions contained in the WRIA 40A Watershed Plan, the WRIA 40A Water Quantity Assessment, and the Stemilt-Squilchuck Community Vision Report which is published by the Trust for Public Lands in partnership with the Stemilt Partnership, and empirically by Beehive Irrigation District enacting a 75% water rights cut to senior water rights holders during the public comment period on the DEIS for this project.

- 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.

Finding from the WRIA 40A Watershed Plan – May 2007

Under developed conditions, irrigation diversion places a considerable demand on the runoff component of the water balance. The water balance predicts nearly zero runoff during an average year (Table 5-2), a negative value during a dry/warm year (Table 5-3) and a runoff of 16 cubic feet per second during a wet/cool year (Table 5-4). The contribution to streamflow from baseflow by groundwater and irrigation return flow is not quantifiable without accurate streamflow data, and therefore, not estimated. Baseflow contributes to streamflow late into the season in most years.

Excerpt from Results section of WRIA 40A Water Quantity Assessment

- The upper basin is the source for domestic and irrigation water for most of the basin. All the water in the basin is currently used; approximately 5,500-acre feet is actually imported to the basin from the Columbia River;

Major Finding of the Stemilt-Squilchuck Community Vision Report

Base flow comes from aquifers. If allowed to drill and pump as suggested in the phasing plan in this DEIS, the development will reduce stream flow. The development is clearly not consistent with Land Use Goal LU 3 because it attempts to steal from the spent water budget.

F. CHELAN COUNTY COMPREHENSIVE PLAN – CHAPTER 6 – CAPITAL FACILITIES ELEMENT – SECTION V. GOALS AND POLICIES – CF 1.20

Section V. Goals and Policies, of the Capital Facilities Element of the Comprehensive Plan contains Levels of Service Policy CF1.20, which is to ensure that development conforms to all applicable requirements of the IFC or alternatives as approved by the Fire Marshall.

Policy CF 1.20 Fire Protection: Ensure that development conforms to all applicable requirements of the International Fire Code or alternatives as approved and administered by the Chelan County Fire Marshall.

Rationale: Provisions must be made for the protection of life and property from fire.

Snip from Chelan County Comprehensive Plan

The development application argues not to conform to applicable requirements of the IFC, and instead asks that the Fire Marshall allow exceptions to reduce ingress/egress and fire flow requirements. To grant such exceptions would not be consistent with the comprehensive plan. To do so would be a code violation since the exceptions are only allowed when “...*such modification does not lessen health, life and fire safety requirements.*” (IFC Section 104.9). The proposed development is not consistent with the Capital Facilities Element of the Comprehensive plan because it requires easing of a development requirement that provides a second egress, which enormously increases the life safety risk due to the likelihood of the primary egress route being blocked by wildfire.

G. CHELAN COUNTY COMPREHENSIVE PLAN – CH 11 – TRANSPORTATION ELEMENT – SUBCHAPTER 5 – TRANSPORTATION VISION

In the transportation vision section of the Comprehensive Plan, the County declares “*Chelan County will maintain its current LOS standards roadways (LOS C for rural roads and LOS D for roadways in the urban growth areas).*” The traffic impact analysis ([appendix I](#)) concludes that the level of service on Squilchuck Road will fall to LOS D.

Table 12: 2034 Squilchuck Road HCM Calculations

Factor	Feb. Weekday 2023 Count		Feb. Saturday 2023 Count	
	Northbound	Southbound	Northbound	Southbound
PM Peak-Hour Existing Volume [veh/hr]	271	194	349	128
2034 With Development Volume [veh/hr]	635	568	814	518
Peak-Hour Factor (PHF)	0.86	0.87	0.85	0.83
Heavy Vehicle Factor	3.7	0.9	0.9	0.9
FgPTSF	1	1	1	1
Et	1	2.9	1	3.1
Passenger Car Equivalent [pc/hr]	740	670	960	640
Estimated PTSF [%] ⁴	65%	62%	72%	66%
LOS⁵	C	C	D	C

Table 12 - 2025 Kimley Horn Traffic Impact Analysis

The proposed development is not consistent with the Transportation Element of the Chelan County Comprehensive Plan because the proposed level of service is lower than the County standard.

H. CHELAN COUNTY COMPREHENSIVE PLAN – CH 11 – TRANSPORTATION ELEMENT – SUBCHAPTER 6 – CAPITAL PLAN

Chapter 6 of the Transportation Element of the Comprehensive Plan outlines the County's 20 year major projects capital plan. Improvements to Squilchuck Road are not included in the 20 Year Plan.

Wenatchee Vicinity	W-1	Easy Street/School Street	Intersection Improvements	\$1,500,000
	W-2	Easy Street/Peters Street	Intersection Improvements	\$1,500,000
	W-3	Wenatchee Heights Road	Road Reconstruction: and upgrade existing shoulders	\$2,500,000
	W-4	Easy St/Crestview St	Intersection Improvements	\$140,000
	W-5	Knowles Road, Phase I	Roadway Improvements - Phase I: American Fruit Road to Rolling Hills Lane	\$1,800,000
	W-6	Knowles Road, Phase II	Roadway Improvements - Phase II: School Street to American Fruit Road	\$1,500,000
	W-7	So. Wenatchee Area Pedestrian, Phase II	Pedestrian improvements Mission View School to Crawford Avenue	\$600,000
	W-8	Peters Street	Widening - Easy Street to School Street	\$800,000
	W-9	S. Wenatchee Avenue	Construct sidewalk on S. Wenatchee Avenue between Boodry Street and city limit	\$870,000
	W-10	American Fruit Road	Roadway Improvements - Knowles Road to Crestview Road	\$800,000
	W-11	School Street	Mid-block crossing improvements (Rectangular Rapid Flashing Beacon and ped ramps)	\$40,000
	W-12	Sunnyslope	Update subarea plan to incorporate new growth assumptions and revise planned transportation network (includes new connection to US 2)	\$150,000
	W-13	West Wenatchee (new circulation areas)	Update subarea plan to incorporate new growth assumptions and revise planned transportation network	\$150,000
	W-14	Boodry/S. Wenatchee Ave Improvement	Malaga-Alcoa Intersection to Squilchuck Creek Bridge	\$1,800,000
	W-15	Easy St Bikeway (SR2/97 to School St)	Bike lane - mark and sign existing shoulder as designed bike lane for access to/from Sunnyslope	\$66,000
	W-16	Number One Canyon Road	Improve drainage and stormwater runoff and provide pedestrian facility	\$940,000
Wenatchee Subtotal				\$15,156,000
Countywide Total				\$101,846,000

20 Year Plan for Wenatchee Vicinity – Comprehensive Plan

In fact, no major expenditures associated with mitigation or maintenance for the development are considered in the County's Vision Projects beyond the 20 year timeframe. The following is the complete list of County vision projects.

Location	Title	Description	Planning Level Cost
Cashmere / Monitor	Monitor Main Street Bridge Replacement	Bridge replacement	\$18,700,000
Cashmere / Monitor	Sunset Highway	Reconstruct to city standards (N Division St to Goodwin Rd); would follow Goodwin Bridge reconstruction	\$7,000,000
Chelan	Boyd Road	Construct/widen shoulders, construct sidewalks in UGA, upgrade base material, and pave between city limits and Wapato Butte Road	\$3,030,000
Leavenworth	Chumstick Highway Rehabilitation	Construct all-weather road and improve some safety elements including spot widening of roadway	\$10,000,000
Malaga	Stemilt Creek Road	Spot improvements along the corridor to construct/widen shoulders, improve vertical/horizontal curves, add signage, and reconstruct sections of roadway	\$6,720,000
Malaga	Malaga-Alcoa Highway	Spot safety improvements	TBD
Manson	Manson Stormwater Drainage Improvements	Improve drainage within the Manson Area	\$15,000,000
Manson	Alternate Route from Chelan to Manson	Investigate alternate route	\$300,000
Peshastin	Peshastin/Mill Site Connector	Port Proposed Bridge from US 2 to Peshastin	\$50,000
Peshastin	Main Street	Railroad grade separated crossing structure	\$10,000,000
USFS	Number 2 Canyon Road	Potential improvement of road bed structure	\$180,000
Sunnyslope	School Street Improvements	Extend School Street improvements between US 2 and Easy Street	\$700,000
Sunnyslope	Crestview Road to Knowles Road Connector	East / West connector north of Rolling Hills Lane	TBD

Vision Projects beyond 20 years – Comprehensive Plan

The Traffic Impact Analysis (TIA) concludes that intersections will require modification, that further mitigation could be required, and that no mitigation *should* be required for Squilchuck Road. However, development construction vehicles and 10,000 new daily trips will degrade the road, create LOS D conditions, and require future maintenance dollars. The TIA report argues that the development should

not be required to pay any additional fees, thus leaving any maintenance costs to County taxpayers. The additional cost for maintenance or even reconstruction of Squilchuck Road is not accounted for in the County's 20 year capital plan and therefore the development is not consistent with the Transportation Element of the Comprehensive Plan.

- **4.4.3.2 Impacts from Operation - Stemilt-Squilchuck Recreation Plan**

The Stemilt-Squilchuck Recreation Plan divides the planning area into three zones. The development and ski area occur mostly in zone 2. The DEIS states that: *The proposed project would be consistent with the desired conditions and recommendations of the [Stemilt-Squilchuck Recreation Plan](#) related to protecting sensitive ecological areas while providing additional recreational opportunities in planning Zone 2.*

This statement is misleading because it only highlights the small amount of agreement with the plan, and does not discuss the obvious conflict with the "Desired Conditions for Zone 2" which outline a vision for Natural Resources, Visitor Experience, Activities, and Facilities that are not consistent with the construction of a 4000 person, 7812 bed, urban development. The Desired Conditions of the Stemilt-Squilchuck Recreation Plan include:

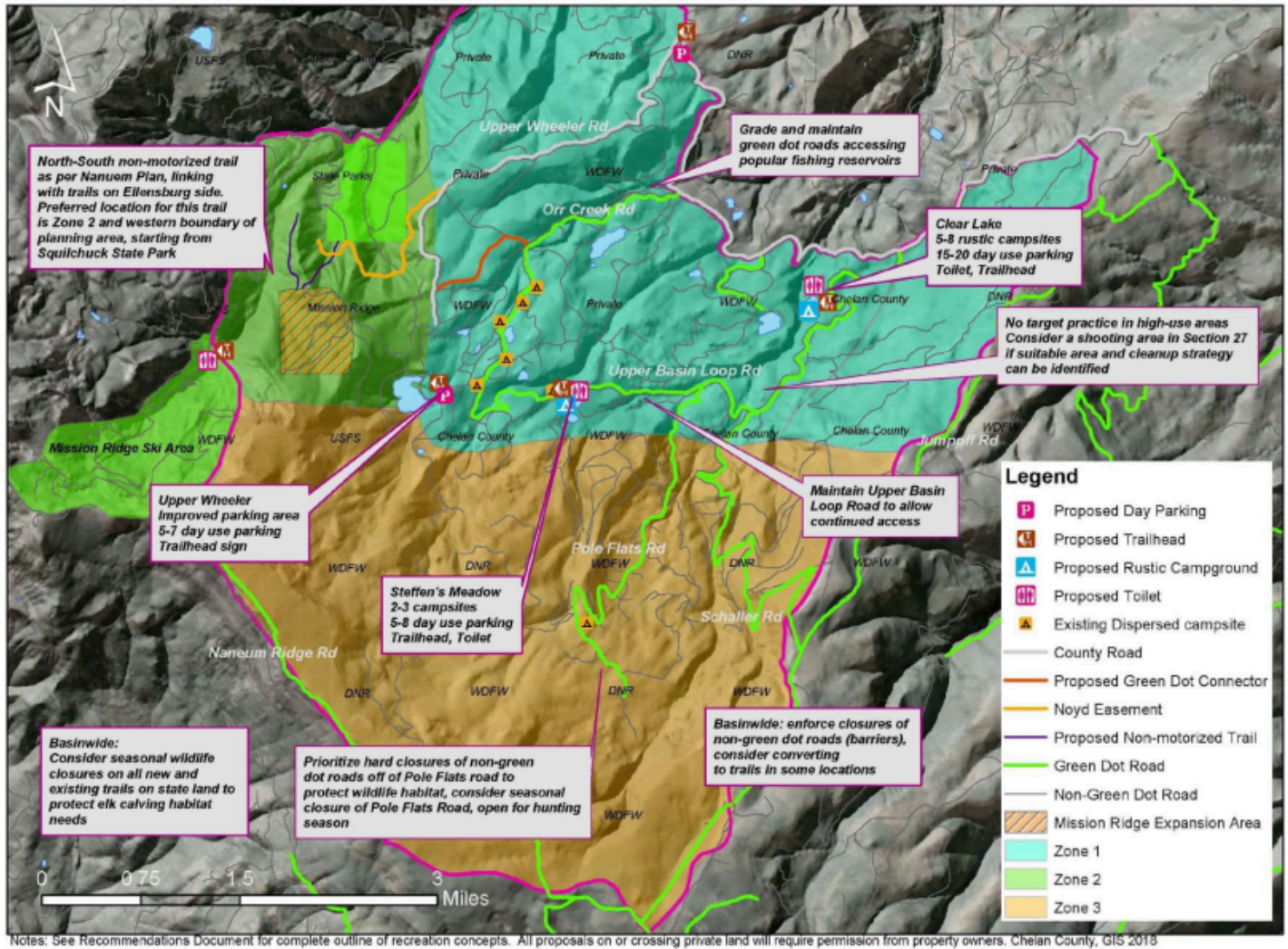
Natural Resources: *Sensitive hydrological areas, wildlife, and forest health are protected and largely undisturbed just off roadways. Impacts and modifications of the landscape are found at designated recreation sites, irrigation and reclamation district infrastructure, communities, and along designated roads.*

The impacts of a 4000 person urban development do not protect sensitive hydrological areas (2 wetlands are proposed to be filled in for home construction), wildlife (elk and mule deer calving grounds and migration corridors are interrupted, basalt meadow pika habitat is destroyed), or forest health (endangered whitebark pines and old growth fir and ponderosa pines are removed). The impacts extend well beyond the locations listed in the recreation plan. The development is not in agreement with the desired condition for natural resources in the Stemilt-Squilchuck Recreation Plan.

Visitor Experiences: *Visitors have better access to more recreational opportunities through creation of designated trail linkages to adjacent partner trails and areas; designated trail linkages are compatible with seasonal wildlife usage.*

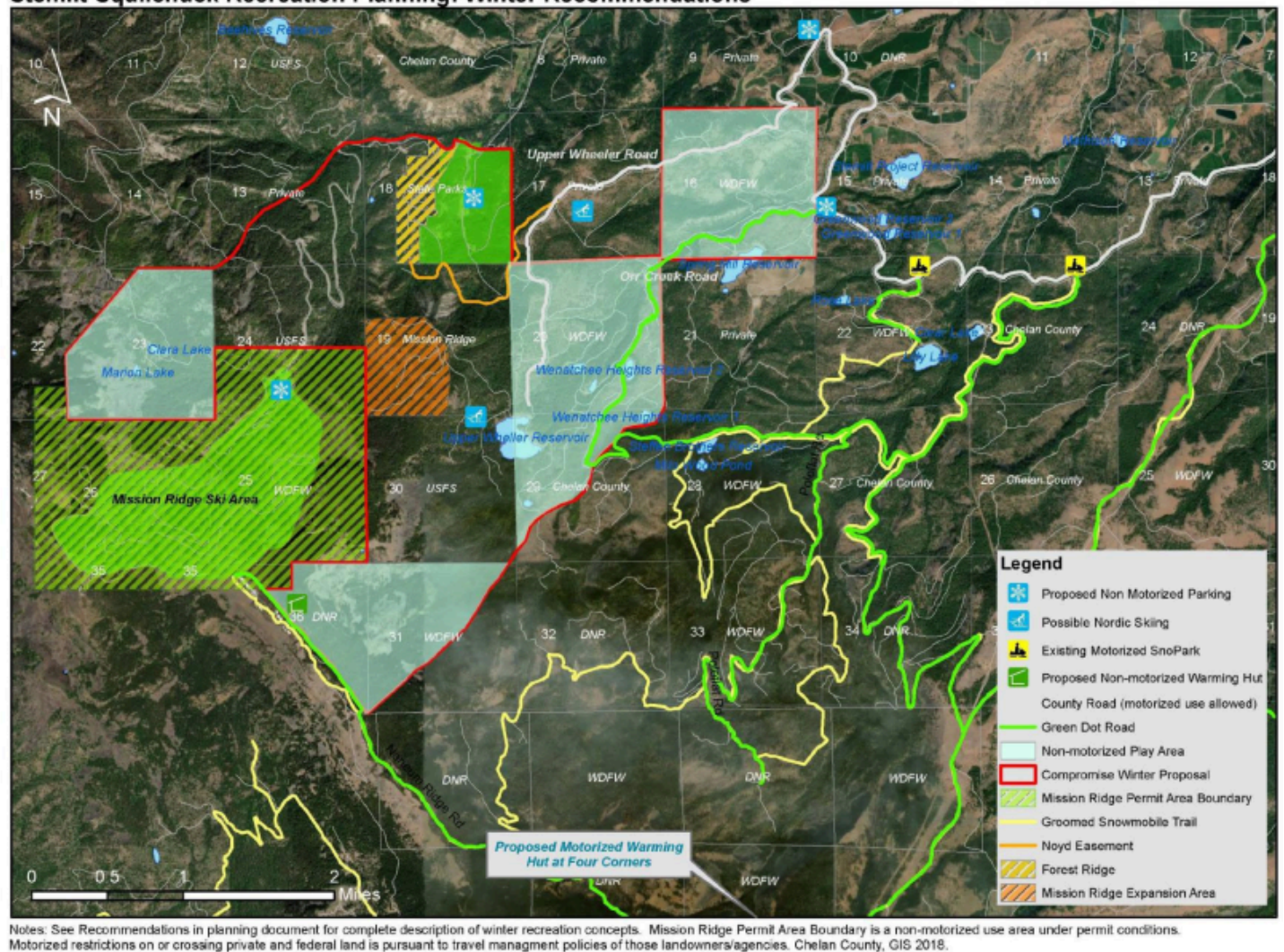
The vision for trail linkages include creating new mountain bike trails that connect Mission Ridge to Squilchuck State Park. The development does not enhance the concept of trail linkages, it creates a paved private community interrupting the possibilities. The plan's summer and winter recommendation maps are shown below and the development is not included in either map. **The Stemilt-Squilchuck Recreation Plan does not include the proposed development in its desired condition for visitor experiences.**

Stemilt-Squilchuck Recreation Planning: Summer Recommendations



Recreation Plan Summer Map

Stemilt-Squilchuck Recreation Planning: Winter Recommendations



Recreation Plan Winter Map

Activities: This zone includes day use, with group camping available at Squilchuck State Park. Appropriate visitor activities include hiking, mountain biking, horseback riding, wildlife viewing, hunting, fishing, cross country skiing, backcountry skiing, snowshoeing. ATV and snowmobile use are appropriate in this zone only on a designated and agreed-upon route for Forest Ridge residents, subject to seasonal wildlife closures, in order to access the Green Dot road system in the summer or groomed snowmobile trails in the winter.

The vision describes the current recreational activities that are available in the upper Squilchuck and Stemilt basins as desirable for the future. The activities offered by the development include alpine and nordic ski trails, overnight and year-round intrusive uses that are more intense than the rustic day-uses described by the vision, and that cut off access to many of the current uses. The proposed development is not in agreement with the desired condition for activities in the Stemilt-Squilchuck Recreation Plan.

Facilities: Facilities in this zone are limited to rustic day use parking areas to accommodate high use trailheads and strategically placed sanitation facilities for trailheads and popular reservoirs.

Other appropriate facilities in this zone include primitive trails and signs to clarify routes and uses allowed in higher use areas.

The desired facilities do not include 110,000 square feet of commercial and entertainment space, 265 single-family homes, 621 multi-family units, a hotel, or new paved roads. The proposed development is clearly not in agreement with the desired condition for facilities in the Stemilt-Squilchuck Recreation Plan.

- **4.4.3.2 Impacts from Operation - Stemilt-Squilchuck Community Vision Report**

The DEIS states:

"The proposed project would be consistent with the vision and recommendations of the Stemilt-Squilchuck Community Vision Report related to protecting water and wildlife resources and recreational access. The proposed project has been planned to accommodate multiple uses and to protect sensitive areas by setting aside approximately 620 acres of open space."

"The proposed project will be located adjacent to the existing Mission Ridge resort. The most intensive project land uses will be clustered at the New Village Base area, minimizing impacts on critical water, wildlife, and recreational resources and existing development patterns. The Applicant will work with WDFW to incorporate seasonal trail restrictions to protect wildlife. The proposed project will not prevent access to nearby public lands."

The very first community belief bullet in the executive summary of the Stemilt Partnership's September 2008 Stemilt-Squilchuck Community Vision report is that urban development cannot be supported in the upper basin.

- **Resource lands in the upper watershed cannot support urban-level development;**

Snip from Executive Summary of the Stemilt-Squilchuck Community Vision

The report studied development and listed the following major concerns:

Major Concerns

Increased demand on water resources*****

Losing access to public land*****

Increased habitat fragmentation and pressure*****

Major concerns listed in the Development section of the Community Vision Document

The report found that high-density development should occur near existing urban areas.

- **Future development in the upper basins should emphasize public access and some recreational opportunities. Higher-density development should occur in lower canyons, stretching from existing urban areas;**

Major finding listed in the Development section of the Community Vision Document

The Community Workshop results listed in the plan included:

- Increased human use of the upper basins would be a bad thing (already enough);
- Many want the upper basin area to remain open and undeveloped; and
- Concern about more formalized development recreational trails – would attract more people and more problems.

Snip from Major Findings of Community Workshop Results

The proposed development is clearly not consistent with the Stemilt-Squilchuck Community Vision Document. Contrary to the vision's concerns and findings, the development proposes urban-level development in the upper watershed, increases demand on water resources, closes access to public land that will be added to Mission Ridge's USFS Special Use Permit Area, increases habitat fragmentation and pressure by logging, building, installing roads and chairlifts, and places high-density development in an area not connected to existing urban areas. **The DEIS should be revised to reflect the actual agreement condition of the project with the Stemilt-Squilchuck Community Vision Document.**

- **4.4.3.2 Impacts from Operation - WRIA 40A Watershed Plan**

The DEIS states:

The proposed project would be consistent with the recommendations of the WRIA 40A Watershed Plan by constructing a new water storage reservoir to support snow making. The reservoir will provide additional storage for fire suppression water and can help to sustain streamflows in the watershed.

This statement is misleading and dishonest because it cherry picks the one goal (additional reservoir storage) where the project agrees with the WRIA 40a conclusions and ignores the overall conclusion of the study. The conclusion of the Water Quantity Assessment is that on an average year, irrigation demand exceeds runoff with a water balance deficit of 550 acre feet on an average year and 12,690 acre feet in a dry/warm year. This is a large amount of water. For context, the Beehive Irrigation Reservoir holds 210 acre feet of active storage. It would take 60 Beehive Reservoirs to account for the shortage on a dry/warm year. The project intention discussed in section [2.3.3 Proposed Project Operation and Phasing](#) is to remove water from the ground through drilled wells for the initial phases of the project. The development plan violates the conclusion of the WRIA 40A documents by proposing to remove water from a watershed that is already over-allocated.

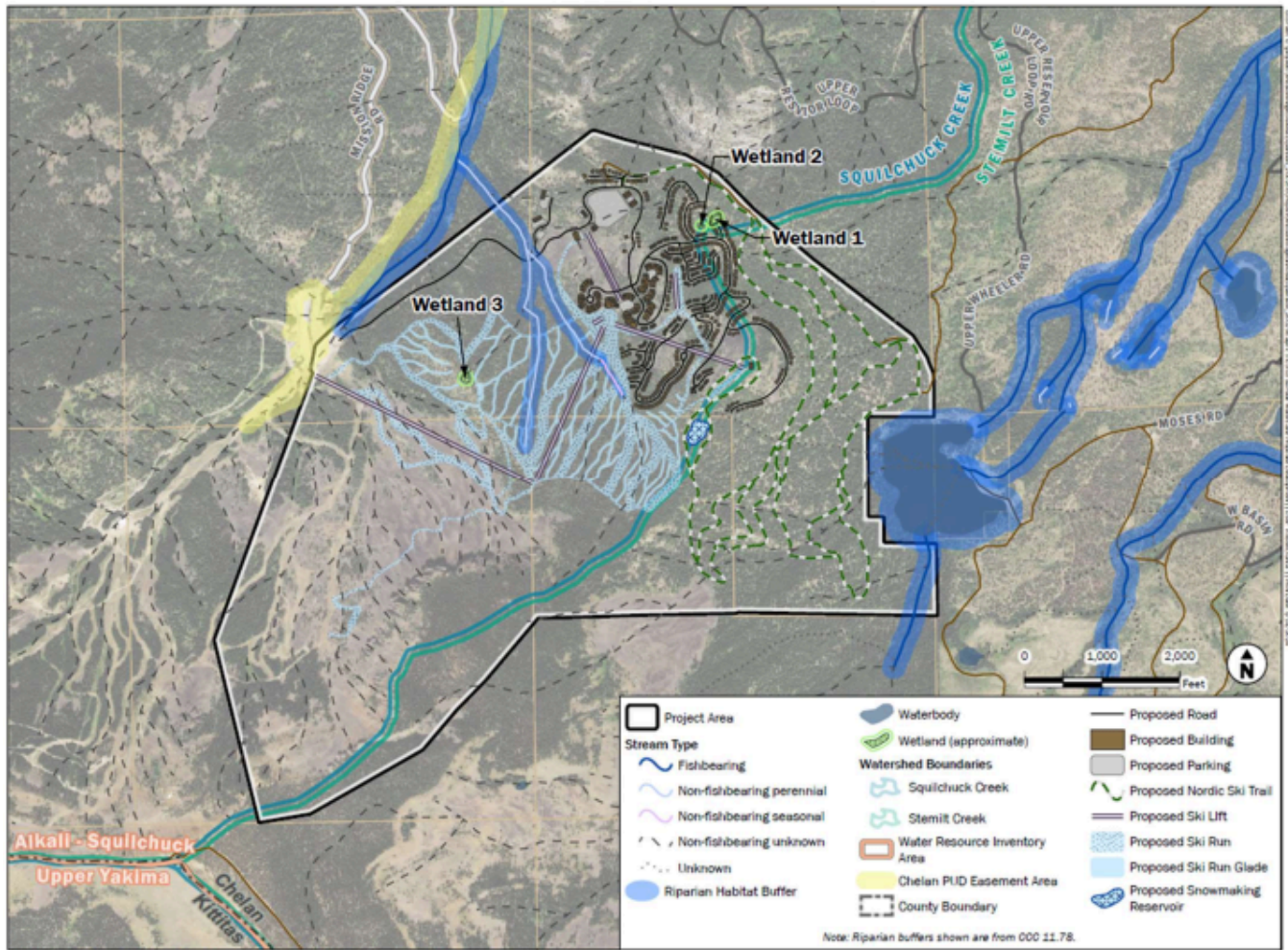
The DEIS states:

The project layout will protect identified wetland and riparian areas.

This is not true. The two identified wetlands in the development footprint are shown to be covered by streets and housing units. The wetlands have already been damaged by the developer during a 2025 logging operation. The following photos show heavy machinery tracks actually traveling in and through both seasonal ponds and category III wetlands.



Wetlands locations circled in orange and yellow. Clip from [Streams and Wetlands and Riparian Area Plan A-2b 2022 application maps](#)



Clip from DEIS Figure 5.6-3 showing wetland locations. Also note the proximity of the proposed driveway access road (black line above "Wetland 3" and Squilchuck Creek (wide blue line next to yellow road).



Machine tracks from 2025 logging project



Machine tracks and tree debris from 2025 logging project

The DEIS states:

At full-build out, groundwater recharge and connected summer streamflow are expected to increase in response to importing water from outside the proposed project area and spring snowmelt from artificial snowmaking (see Section 5.2).

This statement is misleading as it ignores the effect on the watershed during the first three phases during which the developer intends to remove water from the ground through drilled wells for Phases 1, 2, and 3. The same [phasing plan](#) indicates that the developer has the ability to stop construction at any time with no obligation to complete future phases.

"If permitted, each phase of the Proposed Project would be self-sufficient and would not be dependent upon a future phase. Each phase would represent a logical and compact extension of infrastructure and services".

The developer could stop construction after the third phase, with 85% of the project complete, and with no PUD water system to the project. The DEIS ignores this possibility and uses persuasive and misleading language to discuss a full-buildout condition which may never happen. The DEIS should be revised to examine the actual agreement or disagreement with the WRIA 40a Watershed Plan and Water Quantity Analysis.

- **Section 4.4.3.2 Impacts from Operation - Chelan County Zoning: Master Plan Resorts Overlay District (MPR)**

The DEIS states:

The County has undertaken a preliminary analysis of the proposed project's consistency with the MPR standards of CCC Chapter 11.89, which indicates the project is generally consistent with the MPR standards pending results of the SEPA EIS.

The project is **not** consistent with MPR standards. [Chelan County Code Chapter 11.89.010 - Purpose](#) allows “the development of master planned resorts that complement the natural and cultural attractiveness of the area without significant adverse effects on natural and environmental features...” The title of an entire chapter of the [DEIS](#), almost 90 pages long, contains the phrase “IMPACTS WITH SIGNIFICANT AND UNAVOIDABLE IMPACTS” This project is not without significant adverse effects on natural and environmental features and therefore does not meet the very first Chelan County code requirement for MPRs.

4 → **AFFECTED ENVIRONMENT, PROBABLE SIGNIFICANT IMPACTS, AND MITIGATION MEASURES—IMPACTS WITH SIGNIFICANT AND UNAVOIDABLE IMPACTS**

Following review of scoping comments, Applicant technical reports, and consulting agency feedback, this EIS concludes that construction and operation of the Proposed Project **would have** probable significant adverse impacts within four elements of the Proposed Project's affected environment:

- → **Earth:** Construction and operation will increase population and water management in an existing high landslide risk area.
- → **Fire Risk:** Operation will lead to increased activity in an existing high fire risk area.
- → **Visual:** Night ski operations will introduce new light and glare sources.
- → **Land Use:** While consistent with local planning, the land use will change as a result of operation of the Proposed Project.

The following four subsections discuss each of these four elements, respective impacts from the Proposed Project, and mitigation options in further detail.

Snip from DEIS, an entire chapter dedicated to the unavoidable significant environmental impacts caused by this project

In addition, CCC 11.89.040(4) requires that “[t]he tract or tracts of land included in a proposed master planned resort must be in one ownership or control or the subject of a joint application by the owners of all the property included.” CCC 11.89.080(1) confirms that “[f]or an application on property(ies) with multiple ownership(s), all property owners shall submit a joint application.” This application clearly does not meet these requirements as the multiple tracts of land included in the application are subject to a convoluted system of control and ownership, involving USFS, WDFW, and the applicant. USFS and WDFW did not submit a joint application with the applicant here. The applicant has not even demonstrated that they can get approval from USFS or WDFW to use the land that they own as a part of this resort application.

In addition, CCC 11.89.040(3) provides that “[m]aster planned resorts shall not be located on lands designated as agricultural or forest lands of long-term commercial significance unless a finding is made that the land is better suited, and has more long-term importance, for the MPR than for the commercial harvesting of timber or agricultural production.” There are 129 acres of land included in the MPR that are “designated as agricultural or forest lands of long-term commercial significance.” The DEIS does not even

attempt to demonstrate that this land “is better suited, and has more long-term importance, for the MPR than for the commercial harvesting of timber or agricultural production.” Instead, the DEIS dismisses this criterion because these 129 acres “will be permanently conserved and not converted to other uses.” But that is not the question that this criterion, which is concerned with keeping prime timber land available for commercial harvest available, is asking. Regardless of whether those forests are conserved, they are being removed from eligibility for commercial harvesting and the applicant needs to establish that those 129 acres are better suited and more important for the MPR than for commercial harvesting.

Further, Chapter XV, Goals and Policies for Master Planned Resorts, of the Land Use Element of the [Comprehensive Plan](#) defines MPRs to be self-contained destination resorts and consist of short-term visitor accommodation. It indicates that the MPR must provide affordable housing for employees when feasible, that MPR’s must preserve the rural character or natural resource used, and single family or multi-family development must not be the primary components of MPRs. If included, permanent residential uses must support the on-site recreational nature of the resort.

The proposed development violates all of these requirements:

The development is not primarily a destination resort. The [Traffic Impact Analysis](#) indicates 9,655 NEW daily trips between Wenatchee and the resort (10,766 on Saturdays). These trips are by people either living at the resort and working in Wenatchee, or living in Wenatchee and recreating at the resort.

Time Period	Total Trips
Average Daily Trips	9,655
PM Peak-Hour	799
Saturday Average Daily Trips	10,766
Saturday PM Peak-Hour	940

Anticipated New Trips per the 2024 [Kimley Horn TIA](#) Table 5

The parking plan listed in the [2020 Mission Ridge Expansion Project Draft Environmental Analysis](#) includes 1510 day use parking spots and only 932 overnight parking spots. With 62% of parking for day use recreation, the main component of the project is not destination resort skiing, it is day use recreation from Wenatchee or surrounding areas.

Table 3-22. Parking Capacity for the Entire Ski Area (Existing and Expansion)

Comfortable Carrying Capacity	4,664 guests
% Arriving by Shuttle/Bus	4
% Parking private vehicles	96
# Guests arriving by car	4,477
# Required Car Parking spaces*	1,990
# Required employee car parking spaces	120
Total required spaces	2,110
Total on-site parking spaces	2,442 (800 Existing Day Use/590 Expansion Day Use/120 Village Plaza underground/932 Overnight Dwellings)
Surplus/Deficit parking spaces	+332

* Multiplier (2.25 people per vehicle)

Proposed Parking per 2020 Mission Ridge Expansion Project Draft Environmental Analysis

The development is not self-contained. The project will rely on Chelan County to provide fire, police and medical services. In addition, there is no grocery planned, and both water and electricity will be supplied from Wenatchee. Full time residents will send their kids to Wenatchee Schools and will commute to town for work.

The development does not consist of short term visitor accommodations. To the contrary, 265 single-family residences and 621 multi-family units are the primary components of the development. The TIA assumes all units are occupied year-round. This is specifically not allowed in an MPR. An example of appropriate permanent residential use in an MPR includes staff residences. While the Comprehensive Plan does make a provision for permanent residences, it requires that they support the on-site recreational nature of the resort.

Policy LU 13.5: Permanent residential uses may be included within the boundaries of a MPR, provided such uses are integrated into and support the on-site recreational nature of the resort.

Snip from Chelan County Comprehensive Plan

A full-time permanent resident of the development, who works in Wenatchee, does not support the recreational nature of the resort. This person will be driving down to work as skiers are driving up. They will be pulling out of their garage as day users are trying to find parking. The two uses are conflicting, not supportive.

The development does not consider affordable employee housing. The intent of an MPR is to be self-contained such that employees would stay and live at the MPR. To do this they need housing. Section M of the project narrative boasts 669 full time jobs. The plan proposes 80 employee beds (not houses). This is not adequate or dignified housing for the working poor who will support this high-end development. There is no feasibility argument against providing housing for all 669 full time employees. The reason it is not included is that the development is not self-contained and is so close to town that commuting to work is expected.

The development does not preserve the rural character or natural resource it uses. The rural character of the Squilchuck valley would be forever changed simply by the volume of traffic brought by this development. The natural resource used to attract people to the development is our beloved Mission Ridge, the hometown ski hill. This development will more than double the daily skiers on the hill. There is no new skiable terrain at the ski area and only a small amount of terrain at the development. The same four chairlifts that currently service the 2000 acre Mission Ridge basin will be unimproved. The seven proposed lifts will only service the 62 acres of beginner and intermediate runs at the remote development. More skiers on the same terrain create longer lines, powder shortage, and more crowded ski runs. The development will transform the ski area from a local-friendly hometown hill into a dispassionate resort crowded with out-of-town guests.

The development clearly does not satisfy the intent or rules of an MPR, and classification as such should be denied. If not classified as an MPR, the County would be unable to legally allow urban development outside the UGA and the entire development plan would be inappropriate. [Chelan County Code section 11.89.020 Applicability](#) indicates that an MPR can be established “when approved in accordance with this chapter.” **The DEIS should be updated to honestly compare the proposal to the requirements of an MPR and recommend against approval of an MPR overlay zone.**

The DEIS cherry picks specific goals of the guiding documents and claims agreement with the global intent. Because the DEIS discussion on the above topics is misleading and persuasive, **the entire section should be revised to appropriately compare the effects of the project against the major stated goals of these guiding community documents.**

Section 4.4.3.2 Impacts from Operation - Critical Areas

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

Section 4.4.3.2 Impacts from Operation - Recreation

The DEIS suggests that the project would increase and expand recreational uses:

“...increased and expanded recreational uses would still be consistent with current uses of the area...the Project Area and lands around it support a state park, national forest, and state wildlife area, all of which already serve recreational uses. The Proposed Project would not conflict with these uses.”

Mission Ridge has a history of limiting or denying travel across public lands within their special use permit area. This behavior can be expected to continue, and extending the boundaries of the ski area’s special use permit will effectively eliminate access to recreationalists who currently use that area as a travel path between the Stemilt Basin and the Mission Ridge parking lot. The uphill route to Stemilt that is described on the Mission Ridge website will become unusable because the path from the parking lot will now be directly beneath a new chairlift and within the expanded Special Use Permit area. **The DEIS should be revised to examine the negative effects of the plan.**

Section 4.4.3.2 Impacts from Operation - Land Use and Potential for Future Growth

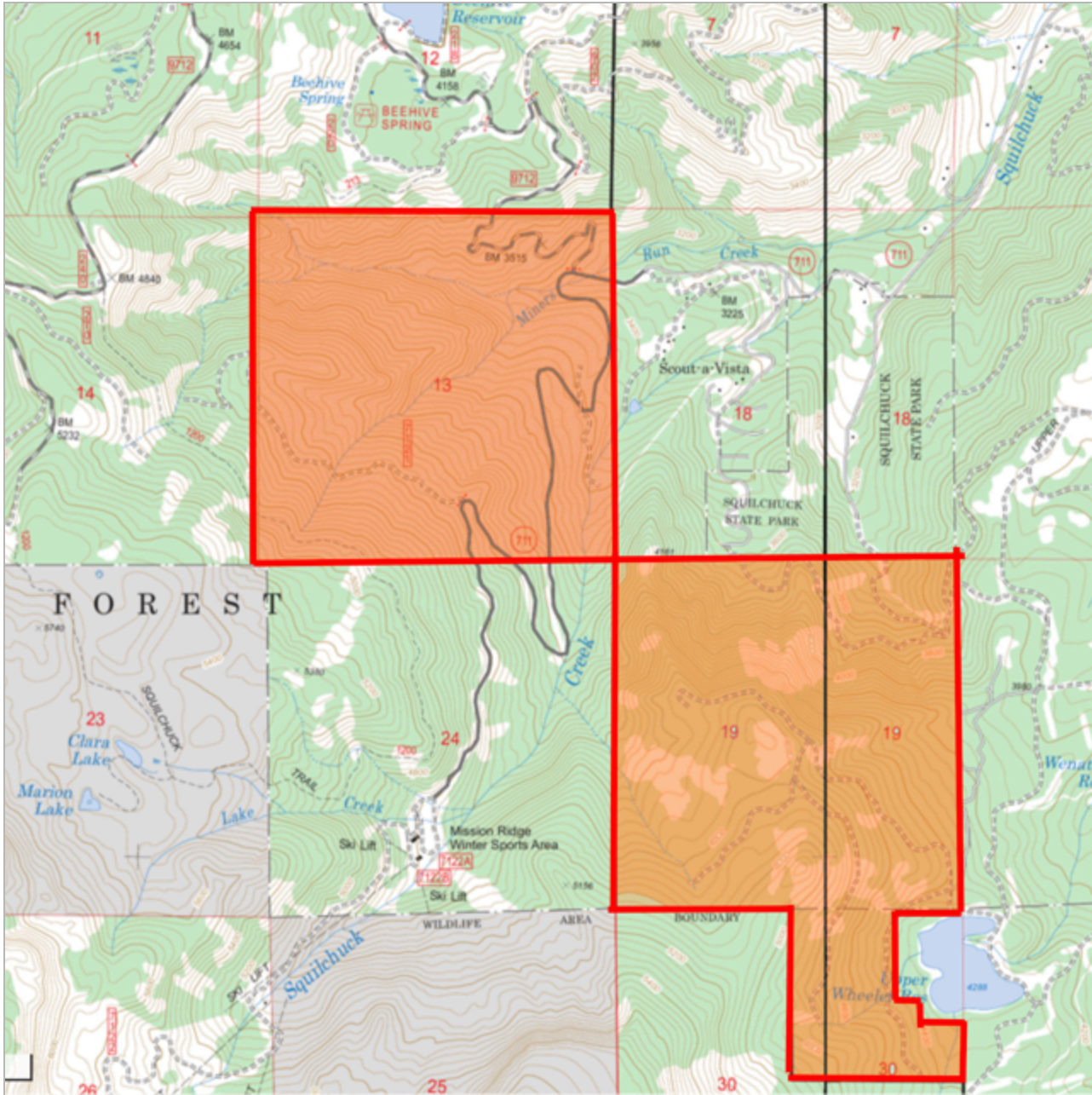
The DEIS states:

The proposed project would require off-site infrastructure improvements located in several areas between the existing Mission Ridge facilities, the City of Wenatchee, and the Columbia River. These include improvements to county and city road systems, the Chelan PUD electric and fiber optic internet service system, and potential improvements to the Chelan PUD public water system. The increased capacity provided by improved roadways and utilities could accommodate growth beyond the proposed project area.

Chelan County Code section 11.89.040 General Requirements for MPRs (10) states:

“Community sewer, water, security and fire protection may be provided on-site and sized to meet only the needs of the development. Existing public service purveyors may provide services as long as the costs related to service extensions and any capacity increases generated by the development are borne by the development and such extensions do not promote sprawl or urban level of development adjacent to the MPR.”

The DEIS has identified in this section that the project utility improvements (water and power) could accommodate growth beyond the proposed project area. Specifically, this is likely to happen on both sides of the Mission Ridge Road on property purchased in January of 2025 by the owner of the development property (see map below). **The DEIS should investigate the potential sprawl enabled by the project and discuss this conflict with County Code.**



The development property is on highlighted Section 19. The highlighted section 13 is a candidate for sprawl enabled by the utility extensions associated with the proposed project.

Section 4.4.3.2 Impacts from Operation - Land Use and Restrictions on Future Land Use

Mission Ridge has a history of limiting or denying travel, hunting, camping, dogs, snowmobile and other motorized access, drone use, and parking on public lands within their special use permit area. This behavior can be expected to continue. Extending the boundaries of the ski area's special use permit will effectively eliminate access to public lands in the expanded Special Use Permit area. This will also cut off access to recreationalists who currently use that area as a travel path between the Stemilt Basin and the Mission Ridge parking lot. The [uphill route](#) to Stemilt that is described on the Mission Ridge website will become unusable because the path from the parking lot will now be directly beneath a new chairlift and within the expanded Special Use Permit area.

The DEIS should be revised to examine the negative effects of the plan on future use within the expanded Special Use Permit area.

Section 4.4.3.2 Impacts from Operation - Project Area Character

The DEIS lists changes in character that were noted in EIS scoping comments including: Lose the rural character of the upper Stemilt and Squilchuck, Lose the “low-key” character of Mission Ridge, contribute to sprawl, urban development outside the urban growth area, and degradation of the outdoor experience, forcing residents to travel farther to find quieter outdoor areas. Rather than assess these concerns, the complete DEIS response includes three paragraphs dismissing the concerns.

“Construction and operation of the proposed project would result in some changes in the character of the area, for example increased traffic, changes in views, and the presence of new booster pump stations outside the main resort area. People who are accustomed to the existing resort may feel the expanded resort provides a different recreational experience than they have had in the past.

However, as noted elsewhere in this chapter, MPRs are subject to numerous Comprehensive Plan policies and code requirements intended to maintain rural character while allowing development to take advantage of natural amenities. The perceived “urban-type” character of the proposed project would be offset by preservation of open space, clustering of the most intensive activities at the Village Base area, design of human-scale buildings and an architectural style appropriate to the mountain setting, and other measures required by Chelan County’s MPR code.

As described previously, it is likely that recreational use of the Mission Ridge area will increase with the proposed project. The extensive off-site recreational opportunities in the vicinity are expected to accommodate increased visitation. Expanding recreational opportunities is a goal of the applicable planning documents for the area. Some recreationists may choose to travel to other areas if they feel the Mission Ridge area becomes too crowded. However, this could also occur over time without the proposed project as the population of Chelan County and surrounding areas grows”.

This response is not an assessment of effects, nor does it address the concerns listed at the beginning of the chapter. **The DEIS should be revised to seriously assess and discuss the changes in character to the rural nature of the upper Squilchuck and Stemilt basins.**

Section 4.4.3.3 Proposed Mitigation Measures - MPR

The DEIS includes as land use mitigation measures the following:

“Compliance with all Chelan County code requirements for MPR development.”

However, the project does not comply with Chelan County Code requirements for MPR development. The [discussion on MPR compliance from Section 4.4.3.2, Impacts from Operation](#), is pertinent. **The DEIS should be revised to eliminate citation of compliance with MPR requirements as a mitigation measure. In addition, the DEIS should analyze the lack of consistency between project objectives and the requirements for MPR development and the MPR strategy should be denied.**

Section 4.4.3.3 Proposed Mitigation Measures - Compliance

The DEIS includes as land use mitigation measures the following:

Compliance with all permit requirements and conditions imposed by Chelan County, USFS, and other agencies

The developer has already demonstrated non-compliance with permit requirements imposed by regulatory agencies. Two examples include

1. Violations of the [Special Use Permit LEA410104](#) which authorizes Mission Ridge to operate a winter ski resort on public land, and

2. Ignoring all jurisdictional requirements for construction of a temporary road that roughly follows the proposed driveway alignment to the development.

It is insincere to cite expected compliance as mitigation, when current behavior is out of compliance. A discussion of each example of non-compliance follows:

1. VIOLATIONS OF SPECIAL USE PERMIT LEA410104.

The [Special Use Permit](#) is clear that the holder has non-exclusive use of the SUP area and that the land is to remain open to the public for all lawful purposes.

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.

[Excerpt from Special Use Permit](#)

The wording of the Off-Season Access Policy section of the website suggests that the non-exclusive concessionaire has the authority to allow or disallow entry onto the public land where they operate.

Off-Season Access Policy

During the off-season (May 1 through October 31), public access within the Mission Ridge Special Use Permit area is permitted except where restricted due to maintenance and construction. While we enjoy seeing the Mission Ridge community in the mountains and on the trails year-round, we also want to remind everyone of a couple of things (or as a heads up to those just starting to enjoy exploring this area we call home).

This is not the full policy. Click the link below to view the full Off-Season Access Policy.

FULL POLICY →

[Excerpt from www.missionridge.com](#)

Mission Ridge should not have the authority to permit or deny access to the public land on which they operate. The SUP is clear that the permit is nonexclusive. It is reasonable that the permit holder could protect their improvements from trespass or damage, but they should not have the power to control access to the public land.

E. Nonexclusive Use. This permit is not exclusive. The Forest Service reserves the right to use or permit others to use any part of the permitted area for any purpose, provided such use does not materially interfere with the rights and privileges hereby authorized.

[Excerpt from Special Use Permit](#)

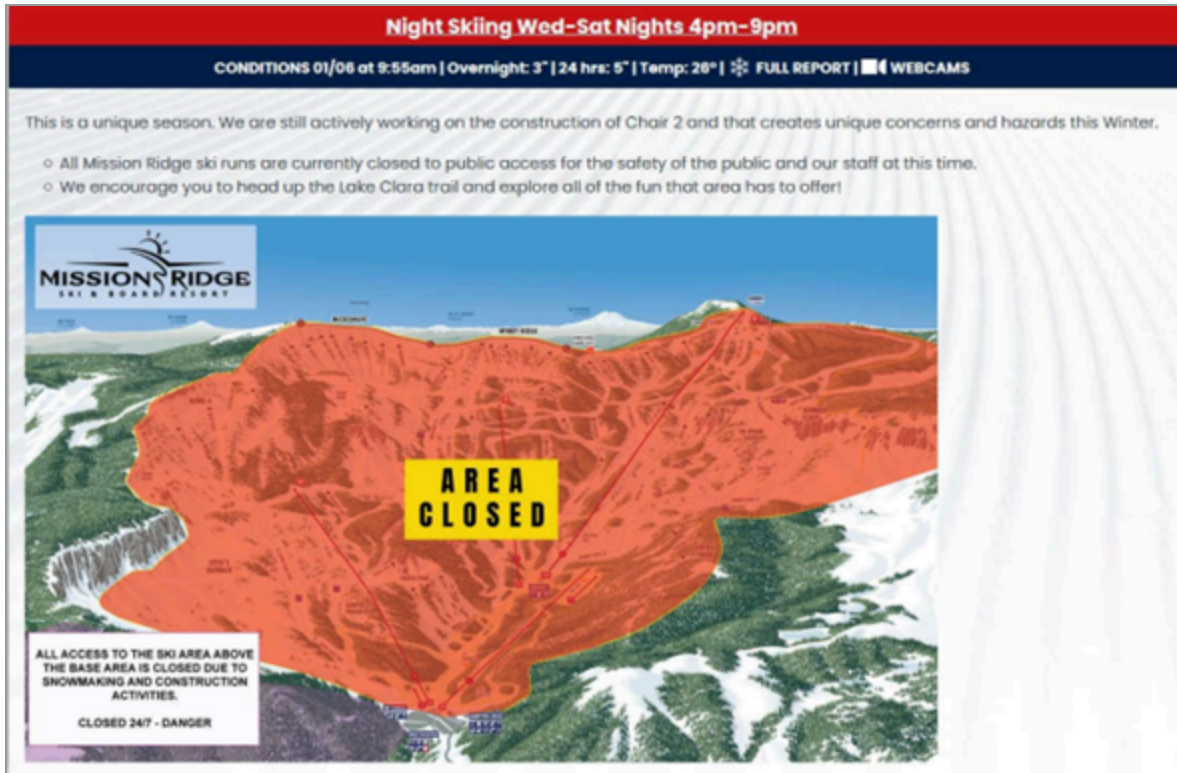
There are several recent incidents when Mission Ridge acted in a manner more consistent with a private property owner than a non-exclusive use concessionaire. They have closed access to the entire SUP area over localized issues and they even have closed the parking lot to paying customers only. A few examples follow:



2016 - 2000 acres "KEEP OUT" over localized land slide



Gated Parking Lot



2021 - Total area closure due to construction of new chair 2



No parking except for ticket holders sandwich board sign in parking lot

In addition to assuming authority of access to the public lands of the SUP area, the holder is creating landscape-wide rules that they may not have the authority to enact or enforce. An example of this is the drone policy which was recently updated on their website:

Drone Policy

Due to safety and privacy concerns, Mission Ridge prohibits the operation or use on or above Resort property of unmanned aerial systems, or drones, by the general public— including model aircraft by recreational users and hobbyists—without the prior written authorization from Mission Ridge. This prohibition includes drones used for filming or videotaping, as well as any drone use by media or journalists operating above or within the area boundaries. This prohibition extends to any devices launched or operated from Resort property, as well as any launched from private property outside of the Resort boundaries. Please contact a resort Marketing representative at 509-663-6543 or marketing@missionridge.com, if you have any questions or if you seek prior authorization to operate any such devices. Any authorized operation of drones on or above Resort property will be governed by Federal Aviation Administration (FAA) rules and regulations, local law enforcement, and / or U.S. Forest Service rules, as well as those policies separately established by this Mission Ridge, which may include certification, training, insurance coverage, indemnification requirements, and waivers or releases of liability. Any violation of this policy may involve suspension of your access privileges to the Resort, or the revocation of your season pass, as well as confiscation of any prohibited equipment, and may subject violators to any liability for damages, including, but not limited to, damages for trespass, violations of privacy, and physical injuries to persons and/or property, as well as legal fees.

Excerpt from www.missionridge.com

It seems reasonable to require as a condition of purchasing a lift ticket, that the ticket holder agree not to use a drone. But to assume authority over airspace, which is already controlled by the FAA, seems inappropriate. Also, and maybe more important, please notice in the drone policy that the SUP area is referred to as “resort property”, again subliminally communicating the idea that the public land is actually owned and controlled by the permit holder. The only “resort property” is the physical improvements installed by the holder. None of the land is resort property, it is all public property.

Further to the permit holder acting as if the public land on which they operate is exclusive to their use, the holder threatens on their website to trespass violators of their rules from the entire SUP area. If someone breaks a rule at Mission Ridge, it makes sense that the ski area can deny that person lift services and building entry. However, denying them entry to the entire public land SUP area is not reasonable, and the holder should not be allowed to do this. The website is specific about the threat of trespass:

The ski area may remove/trespass persons from the permit area for the following acts/behaviors:

Excerpt from www.missionridge.com

In addition to this declaration on the website, the following trespass notice was found on the ground under chair one, which suggests that the ski area is actually exercising this self-proclaimed authority:


MISSION RIDGE
 SKI & BOARD RESORT
**NOTICE OF
TRESPASS WARNING**

Date: 03/09/21

Issued to: [redacted]

Address: [redacted] Wenatchee, WA 98801

This notice is to inform [redacted] that you are **NOT authorized, permitted or invited** to enter or remain on the property located at:

Mission Ridge Ski and Board Resort
 7500 Mission Ridge Rd.
 Wenatchee, WA 98801

You are further advised that if you trespass on said property, we intend to pursue criminal charges through the Chelan County Sheriff's office for Trespass. Any previous authorizations to enter or remain on said property are hereby revoked.

[Signature] Josh Jorgensen, G.M.
 Signature Name Printed/Title

Served:

☐ **Certified U.S. Mail** – Return Receipt Requested, contained in a postpaid wrapper directed to the above named person(s) to the address listed below his/her respective name(s).

☐ **Personal Service.** Date/Time Served: _____

Photo of Trespass Notice

Another activity that is barred under threat of trespass is unauthorized overnight parking or camping. The non-exclusive concessionaire should not have the authority to deny camping on the public land on which they operate.

- **Unauthorized overnight parking or camping.**

Excerpt from www.missionridge.com under rules of use

The language used by the permit holder implies they have exclusive permission and authority over the SUP area. This attitude and these actions are not consistent with the intent of the SUP, which was to allow operation of a ski resort (at the time, this was for the benefit of the community, not for private profit) while also keeping the public land open for all legal uses to the public.

2. VIOLATIONS OF 2017 TEMPORARY ROAD CONSTRUCTION REQUIREMENTS

A USFS [Decision Memo](#) was issued in 2017 citing categorical exclusions and declaring the intention of the Forest Service to issue a special use permit allowing construction of a temporary road. Following this, in 2018 WDFW issued a [Determination of Nonsignificance and Adoption of Existing Environmental Document \(Categorical Exclusion\)](#) accepting the conclusions of the USFS documents and described the project and requirements as follows:

The major components of the temporary road project are comprised of the following:

- 1) New special use permit for USFS land (Appendix C of this SEPA checklist)
- 2) Temporary road footprint:
 - a. approximate length up to 0.67 miles
 - b. approximate width of temporary road surface up to but not exceeding 16 feet
 - c. approximate ground disturbance not exceeding 1-acre
 - d. two temporary bridges placed on temporary supports (above ordinary high water)
- 3) Assessment of geologic risk and feasibility of an expansion area road

4) Soil erosion control and rehabilitation

Trees greater than 8 inches diameter at breast height (DBH) would not be removed, however some trees less than eight inches DBH and shrubs may need to be cleared. The temporary road will fall within the proposed expansion area road corridor width of 32 feet and length of 0.67 miles. This would allow the trackhoe to avoid larger trees and minimize vegetation removal to the extent practicable while minimizing the final length of the road.

The temporary road would require two stream crossings, one at each end of the route (Figure 2 – Figure 4). Temporary bridges set on temporary supports above the ordinary high water mark (OHWM) would be used at both crossings. Both temporary bridges would be designed with hydraulic capacity to pass the 100-year flood event (Q₁₀₀) and associated debris flow.

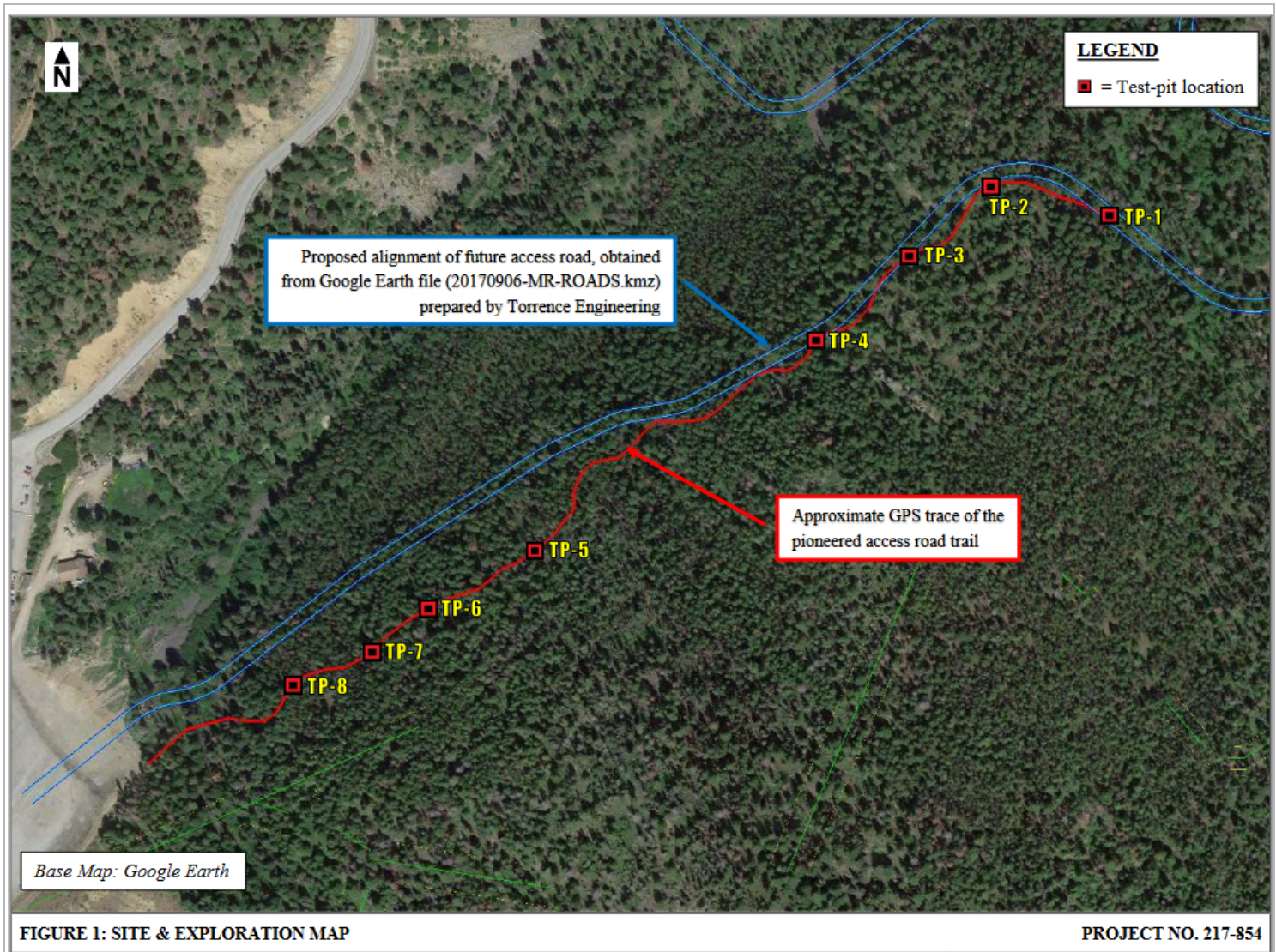
Snip from 2018 WDFW DNS

The [DFW Determination of non-significance DNS/Adoption18-051: Mission Ridge Temporary Road](#) cited ground disturbance less than 1 acre, work monitored by an approved archaeologist, bridges designed and constructed to protect two streams, removal of no trees over 8" DBH, and installation of erosion control measures. The Small Project Internal Scoping Request and CE Tracking Form listed plant and soil rehabilitation requirements including *"rehabilitated by covering with organic material, seeded using a native seed mix approved by the District botanist and drainage features installed as necessary..."*. However, none of these measures were followed.

- A new Special Use Permit was never issued
- Project duration has exceeded one year
- Ground disturbance exceeded one acre
- The road was not constructed in the proposed alignment

- Bridges were not constructed
- Trees over 8" DBH were removed (some over 30" were cut)
- Erosion control was not implemented and cut spoils were cast downhill
- Organic material, seeding, and drainage features not installed

These violations exist on the ground and should be verified and recorded by County and Forest Service personnel. Beehive Irrigation District discussed this road construction thoroughly in their March 20, 2020 [public comment letter](#) to the USFS during the draft Environmental Assessment public comment period. Since the road construction failed to comply with any of the mitigating permit requirements, the project is out of compliance with the categorical exclusion requirements. The road was never officially permitted.



Proposed alignment in blue, actual temporary road alignment in red. From [2018 GN Northern Feasibility-Level](#) Geo study of proposed access road (appx A)

It is insincere to cite expected compliance as mitigation, when current behavior is out of compliance. Since the developer has demonstrated an inability to comply with permit requirements, **“compliance with all permit requirements” should not be cited as a mitigation measure. The DEIS should be**

revised to examine current and expected behavior and discuss specific mitigation requirements that can be enforced and verified.

Section 4.4.4 Significant and Unavoidable Adverse Impacts

The DEIS lists no significant and unavoidable adverse impacts and asserts land use impacts would be insignificant. The DEIS asserts:

"...the proposed project and utility improvements would be consistent with applicable plans and regulations, would not conflict with surrounding land uses..." and "Compliance with all regulatory and permit requirements, and implementation of the mitigation measures described previously, would reduce land use impacts."

The proposed project is not consistent with Chelan County guiding documents, causes significant conflicts with surrounding land uses and creates many significant and unavoidable adverse impacts. The DEIS arguing that the land use impacts are reduced is not a sincere discussion of "Significant and Unavoidable Adverse Impacts". **The DEIS should be revised to include a list of significant and unavoidable adverse impacts as described in chapter 4.4 and as expanded through public comments.**

Section 5 - AFFECTED ENVIRONMENT, POTENTIAL SIGNIFICANT IMPACTS, AND MITIGATION MEASURES – IMPACTS PROBABLY MITIGATED BELOW SIGNIFICANCE

Chapter 5 of the draft EIS concludes that the project will not have significant adverse effects with 11 environmental elements. We argue that the following 6 elements do suffer unavoidable significant adverse impacts if mitigated only to the level suggested in the EIS. These are:

- [5.1 Air](#)
- [5.2 Groundwater](#)
- [5.3 Surface water](#)
- [5.4 Plants and Animals](#)
- [5.6 Transportation](#)
- [5.8 Noise](#)
- [5.10 Recreation](#)

Section 5.1 - Air

Sections 5.1.3.2 Indirect Impacts from Construction, and 5.1.3.4 Indirect Impacts from Operation both claim there are no impacts on air quality. The DEIS does not explore the health impacts of increased air pollution along the roadway caused by the traffic associated with the proposed development. Residents who live along the Squilchuck and Mission Ridge roads currently enjoy mostly clean air with occasional unpleasant smells related to traffic. Specifically, some vehicles traveling downhill from Mission Ridge to Wenatchee ride their brakes enough to create an unpleasant hot brake smell that lingers for several minutes after they pass. With the roughly 10,000 new average daily trips predicted in the [traffic impact analysis](#), and the roughly 1000 vehicles per hour at peak hour, this unpleasant hot brake smell will intensify. The TIA reports that weekday downhill peak hour trips will include 880 cars per hour (see table below). This is 14.6 cars per minute on average. If the brake smell lasts 4 minutes, and only 1 in 60 cars rides their brakes, the smell will be constant with no clean fresh air breaks. This is an unavoidable impact, and to the residents who live along Squilchuck and Mission Ridge road, this will be a significant impact. In addition to the smell, vehicle exhaust is air pollution produced by the burning of fossil fuels. A [2017 study published in the Lancet](#) showed that living close to heavy traffic was associated with a higher incidence of dementia. A January 2010 Health Effects Institute research report "[Traffic-Related Air Pollution: A Critical Review of the Literature on Emissions, Exposure, and Health Effects](#)" concluded that *"...the evidence is sufficient to support a causal relationship between exposure to traffic-related air pollution and exacerbation of asthma."* **The DEIS should be revised to study the indirect impacts from Construction and Operation on air quality related to increased vehicle traffic. Since these impacts are unavoidable and significant, Section 5.1 - Air should be relocated from chapter 5 of the DEIS to chapter 4.**

Table 13: 2043 Squilchuck Road HCM Calculations

Factor	Feb. Weekday 2023 Count		Feb. Saturday 2023 Count	
	Northbound	Southbound	Northbound	Southbound
PM Peak-Hour Existing Volume [veh/hr]	271	194	349	128
2043 With Development Volume [veh/hr]	761	694	966	621
Peak-Hour Factor (PHF)	0.86	0.87	0.85	0.83
Heavy Vehicle Factor	3.7	0.9	0.9	0.9
FgPTSF	1	1	1	1
Et	1	2.9	1	3.1
Passenger Car Equivalent [pc/hr]	880	810	1140	760
Estimated PTSF [%] ⁴	72%	78%	78%	68%
LOS⁵	D	D	D	C

Car trips per the Kimley Horn 2025 TIA

Section 5.2 - Groundwater

Section 5.2 - Water quantity:

Mission Ridge currently uses up to 206 acre-feet of water per year for snowmaking and up to 10 acre-feet of water per year for domestic use. The DEIS describes potentially using an additional 90 acre-feet of water from wells during construction, and up to an additional 90 acre-feet per year for domestic use at the development as well as an additional 150 acre-feet per year for additional snowmaking.

“The existing snowmaking operation has used between 129 ac-ft/yr to 206 ac-ft/yr over the period including the 2017/2018 through 2022/2023 ski seasons. The Proposed Project includes construction of a second surface water reservoir located in the Project Area, which would increase water storage capacity and allow artificial snowmaking to be expanded to the new ski trails. Expansion of snowmaking to new ski runs is anticipated to require a water supply of approximately 150 ac-ft/year.”

The DEIS claims that at full buildout, the PUD water imported to the upper basin will have a net positive water supply benefit. However, the plan discussed in [Section 2.3.3 Proposed Project Operation and Phasing](#) indicates that the developer may stop construction at any time with no obligation to complete future phases. The DEIS describes using on-site groundwater wells as the exclusive source of potable water until eventually being forced to transition to PUD water. By this strategy, all of phase 1 and about half of phase 2 could be built without a connection to the PUD water system. If this is allowed, and the developer stops construction without connecting to the PUD water system, then the impact to the Squilchuck basin is a net additional withdrawal of 240 acre-feet per year. The DEIS argues that because at full buildout there is no net negative water quantity impact, that there are no significant adverse construction or operation related impacts on groundwater quantity from the proposed project. This is not true for the situation where full-buildout is not achieved. From the table below, you can see that the total proposed withdrawal of 456 acre-feet per year after phase 1 and part of phase 2 are complete, is more than double the current withdrawal of ground water at the headwaters of the Squilchuck Basin.

Table: Current and Proposed groundwater withdrawal

	Current Use	During Construction	Halfway through Phase 2
Construction water	0 ac-ft	90 ac-ft	0 ac-ft

Domestic	10 ac-ft	10 ac-ft	10 ac-ft current 90 ac-ft new withdrawal
Snowmaking	206 ac-ft	206 ac-ft	206 ac-ft current 150 ac-ft new withdrawal
Total withdrawal	216 ac-ft	306 ac-ft	456 ac-ft

The lack of water available for allocation to this development is covered in the [Section 4.4.3.2 Impacts from Operation in the Chelan County Comprehensive Plan - LU3 discussion](#), and in the [WRIA 40a discussion](#) in the same section. There is no water available for allocation to this development.



August 2025 senior SquilchuckMiller irrigation water rights cut 75%

- 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.

Finding from the WRIA 40A Watershed Plan – May 2007

- The upper basin is the source for domestic and irrigation water for most of the basin. All the water in the basin is currently used; approximately 5,500-acre feet is actually imported to the basin from the Columbia River;

Major Finding from the Stemil-Squilchuck Community Vision Report

Considering only the full-buildout condition for assessment of adverse impacts is inadequate. The partial complete condition of the project could last between 20 years and forever. **The DEIS should be revised to study the impacts during the early phases of the project if water is withdrawn from the aquifer and before imported PUD water balances the net negative water quantity effects. The conclusion that there are no probable significant adverse construction or operation impacts should be revised to acknowledge the adverse impact during early phases caused by removing water from an already overallocated water**

budget. The study should evaluate seasonal stream flow changes due to domestic and snowmaking withdrawals over the year, and compare current stream flows to proposed conditions in order to assess the impact to senior water right holders downstream from the development. This adverse impact is not mitigatable and Groundwater should be relocated to chapter 4 of the EIS.

Section 5.2 - Water quality:

The wastewater strategy described in the DEIS is to use DOH regulated individual or group on-site septic systems that discharge through drainfields to groundwater for the early phases of the project, and:

“eventually, if needed, a centralized municipal wastewater treatment plant (WWTP) discharging treated effluent to surface water in Squilchuck Creek.”

The DEIS goes on to indicate that large on-site septic system discharge is limited to 100,000 gallons per day, and then demonstrates that this limit is exceeded before phase 2 is complete. The highlighted phrase, “if needed” (above) is insincere in this case where the limiting effluent flow rate is exceeded by nearly a factor of 3 at full buildout. A Department of Ecology regulated WWTP will be necessary.

Table 5.2-2 Anticipated Wastewater Flow Rates by Phase

Project Phase	Estimated Flow Rate (gpd)
Phase 1	91,980
Phase 2	75,450
Phase 3	58,740
Phase 4	54,690
Phase 5	8,370
Total	289,230

Notes: gpd – gallons per day

DEIS anticipated wastewater effluent flow rates. Note that the 100,000 gpd LOSS limit is nearly met with just phase 1 construction.

The DEIS suggests that the amount of area required for drainfields is unknown and states that *“Soil types and depths would inform the treatment level and size and type of absorption field required.”* One hypothetical soil example listed in the DEIS suggests 40 acres will be required. The entire residential development is only about 120 acres in size and the surrounding terrain is steep. Where would 40 acres of drainfield fit? The DEIS goes on to state:

“Additional field work and design is necessary to determine whether the proposal can be fully met through LOSS, or whether a parallel or replacement surface water discharge system is required...The Applicant is prepared to pivot to surface treatment and discharge through an NPDES permit if soils are not suitable.”

This statement is misleading because no additional field work or design is needed to determine whether the proposal can be met through LOSS. The applicant just showed us in the section above that only phase 1 and a portion of phase 2 meet the effluent limits for DOH governed on-site systems. LOSS absolutely cannot meet the proposal effluent demand and an alternate strategy will be required. Further, the DEIS states that in 1986 an FEIS study determined that a WWTP could not be built because the flow in Squilchuck Creek was too small to meet the minimum dilution criteria. The DEIS suggests that because of technology advances, maybe a WWTP could now work. The DEIS states that:

“...wastewater treatment technology has advanced, updated water quality standards have been adopted, permitted discharge limits for specific pollutants are lower (more protective), monitoring and reporting requirements are more stringent, and permitted mixing zones for wastewater discharges are better

defined. These advancements suggest that previous SEPA findings related to wastewater treatment at this site are due for reconsideration...

Based on these arguments, the DEIS concludes that:

Therefore, with proper operation-related mitigating conditions, there would not be probable significant adverse operation-related impacts on... groundwater quality... from the Proposed Project.

This conclusion does not follow the arguments. There has been insufficient study to know whether soils are even suitable for on-site septic systems, and the backup WWTP strategy, which was ruled out in 1986, is “due for reconsideration”. This level of study is inadequate to make any informed decision about the appropriateness of either system or even the viability of the development.

Up to 100,000 gallons per day wastewater discharge is regulated by DOH and covers on-site systems. The applicant has not shown that the site can accommodate OSS up to 100,000gpd. Effluent discharge over 100,000 gallons per day necessitates a wastewater treatment plant which is regulated by the Department of Ecology. The applicant has not demonstrated that a WWTP can be permitted.

Soil studies should be completed to allow preliminary design and layout of septic drainfields to verify whether adequate soils or space even exists. An engineering report in accordance with [WAC 173-240-060](#) and enough preliminary design of the WWTP needs to be completed to the level at which it can be determined whether a WWTP is a workable wastewater treatment solution at the site. The site plans should show the location of the two solutions including general drainfield locations, WWTP location, and discharge to Squilchuck Creek location.

In addition, since wastewater treatment is a public utility, and if the preliminary phases intend to start with on-site systems, then the WWTP needs to be bonded at 150% of the estimated cost of the facility per Chapter 11.89.040 of Chelan County code which states:

“(8) All required public improvements including roads, utilities and public facilities that are part of the approved site plan and narrative shall be completed prior to issuance of a certificate of occupancy by the building official or installation guaranteed by the posting of performance bonds or other surety acceptable to the prosecuting attorney in an amount of one hundred fifty percent of the estimated cost of the outstanding improvements, except that all life/safety improvements must be installed and in operation prior to occupancy.”

In addition, domestic water use introduces [pharmaceuticals](#), [PFAS](#), and [viruses](#) to effluent which will contaminate the currently pristine Squilchuck Creek.

The DEIS should be revised to clarify that a WWTP will be required, to include studies for drainfield soils appropriateness, size and layout, and to include a [WAC 173-240-060](#) compliant engineering report for WWTP appropriateness, location, and cost. The DEIS should also be revised to acknowledge the pharmaceuticals, PFAS, and virus contamination to Squilchuck Creek from domestic effluent and to assess the impact on the watershed for irrigation and drinking water. The DEIS also needs to clarify that the WWTP must be bonded at 150% of the estimated cost.

Section 5.2 - Water supply/rights:

Per the [table](#) above, the DEIS describes use of up to 90 acre-feet of new withdrawal of groundwater for construction related activity, and 240 acre-feet of new withdrawal of groundwater in-perpetuity at the development.

The DEIS argues in [section 5.2.3.1 Direct Impacts from Construction](#) that:

“Full use of the Applicant’s existing right is already authorized and cannot impair other existing rights.”

This is an insincere legal argument that ignores the actual physical impact to senior water rights holders downstream of the development. There is no water available for new withdrawals to support the development. There are more water rights than there is water in the basin.

- 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.

Finding from the WRIA 40A Watershed Plan – May 2007

The downstream users have priority by date and are currently not receiving full distribution of their adjudicated water. Removing additional water beyond what has historically been removed will further impair their rights and is not acceptable.

The DEIS states in section 5.2.3.3 Direct Impacts from Operation:

“The Applicant has stated there would be no enlargement of existing water rights, meaning that the quantity of water that is already authorized and being put to use would remain the same. This is a requirement of state law.”

The highlighted section above is important. It is a requirement of state law that the water right is currently being put to use. However, this is not the case for the rights described in the [Appendix E - 2022 Water Resources memo](#). The memo presents a portfolio of water rights and applications but makes no justification for which rights are currently being put to use. The memo describes required changes to water rights attributes including purpose of use, season of use, expanding the place of use, and adding wells as points of withdrawal. The memo fails to recognize the difference between the legal concepts of “authorized use”, and “currently being put to use”. This is exemplified by the memo’s justification for expanding snowmaking annual withdrawal from 206 acre-feet to 348 acre-feet which reads: “Expanding artificial snowmaking to within the boundaries of the Project will not result in enlargement of existing authorized quantities.” The memo justification fails to recognize that expanding snowmaking will require using authorized rights that have not been put to use.

Expanding artificial snowmaking to within the boundaries of the Project will not result in enlargement of existing authorized quantities.

Final paragraph of section 3.4 Legal Water Availability of the 2022 Water Resources Memo.

The existing snowmaking water right has a priority date of 1993 and is for 348 acre-feet for commercial snowmaking. However, the ski area has only been using up to 206 acre-feet per year. The proposed new reservoir will require about 150 acre-feet per year in addition to the 206 acre-feet currently being used. The apparent assumption of the applicant is that the unused portion of the permitted 348 acre-feet can now be used for the proposed new reservoir. This would be an authorized use, but it does not satisfy the “currently being put to use” requirement.

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PERMIT
TO APPROPRIATE PUBLIC WATERS OF THE STATE OF WASHINGTON

☒ Surface Water (Issued in accordance with the provisions of Chapter 117, Laws of Washington for 1917, and amendments thereto, and the rules and regulations of the Department of Ecology.)

☐ Ground Water (Issued in accordance with the provisions of Chapter 263, Laws of Washington for 1945, and amendments thereto, and the rules and regulations of the Department of Ecology.)

PRIORITY DATE August 25, 1993	APPLICATION NUMBER S4-31615	PERMIT NUMBER S4-31615P	CERTIFICATE NUMBER
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NAME
Mission Ridge Mountain Corporation

ADDRESS (STREET) PO Box 1668	(CITY) Wenatchee	(STATE) Washington	(ZIP CODE) 98807-1668
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The applicant is, pursuant to the Report of Examination which has been accepted by the applicant, hereby granted a permit to appropriate the following described public waters of the State of Washington, subject to existing rights and to the limitations and provisions set out herein.

PUBLIC WATERS TO BE APPROPRIATED

SOURCE
Squillchuck Creek and Lake Creek (tributary to Squillchuck Creek); Unnamed Spring

TRIBUTARY OF (IF SURFACE WATERS)
Columbia River

MAXIMUM CUBIC FEET PER SECOND 1.5	MAXIMUM GALLONS PER MINUTE	MAXIMUM ACRE-FEET PER YEAR 358
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QUANTITY, TYPE OF USE, PERIOD OF USE
0.1 cfs, 10 acre-feet per year for community domestic supply from October 1 through May 1;
1.4 cfs, 348 acre-feet per year for commercial snowmaking.

1993 Snowmaking permit

The existing snowmaking operation has used between 129 ac-ft/yr to 206 ac-ft/yr over the period including the 2017/2018 through 2022/2023 ski seasons. The Proposed Project includes construction of a second surface water reservoir located in the Project Area, which would increase water storage capacity and allow artificial snowmaking to be expanded to the new ski trails. Expansion of snowmaking to new ski runs is anticipated to require a water supply of approximately 150 ac-ft/year. New snowmaking facilities would be operated similar to existing facilities.

Snip from DEIS section 5.2.3.3 Direct Impacts from Operation

The 150 acre-feet per year required for expanded snowmaking is an example of a previously authorized quantity which has not been put to use and is therefore no longer valid. It is an insincere argument that starting to remove that quantity of water now would have no impact on downstream senior water rights holders. This water has never been removed from the system, and to start now would be a new withdrawal that would affect stream flow and reduce the already curtailed rights of downstream irrigators. **The DEIS should be revised to recognize that new withdrawals on previously authorized quantities which have not been put to use, will have a significant negative impact on senior water rights holders downstream of the development.**

Section 5.2.4 Significant and Unavoidable Adverse Impacts

The DEIS states: "...there would be no significant and unavoidable adverse impacts related to groundwater from construction or operation of the Proposed Project."

However, new withdrawals from the headwaters of the Squillchuck drainage will negatively affect streamflow quantity and the ability of senior water rights holders to fulfill their rights. **The DEIS should be revised to recognize that new withdrawals on previously authorized quantities which have not been put to use, will have a significant negative impact on senior water rights holders downstream of the development. This adverse impact is not mitigatable and Section 5.2 - Groundwater should be relocated to chapter 4 of the EIS.**

Section 5.3 - Surface Water

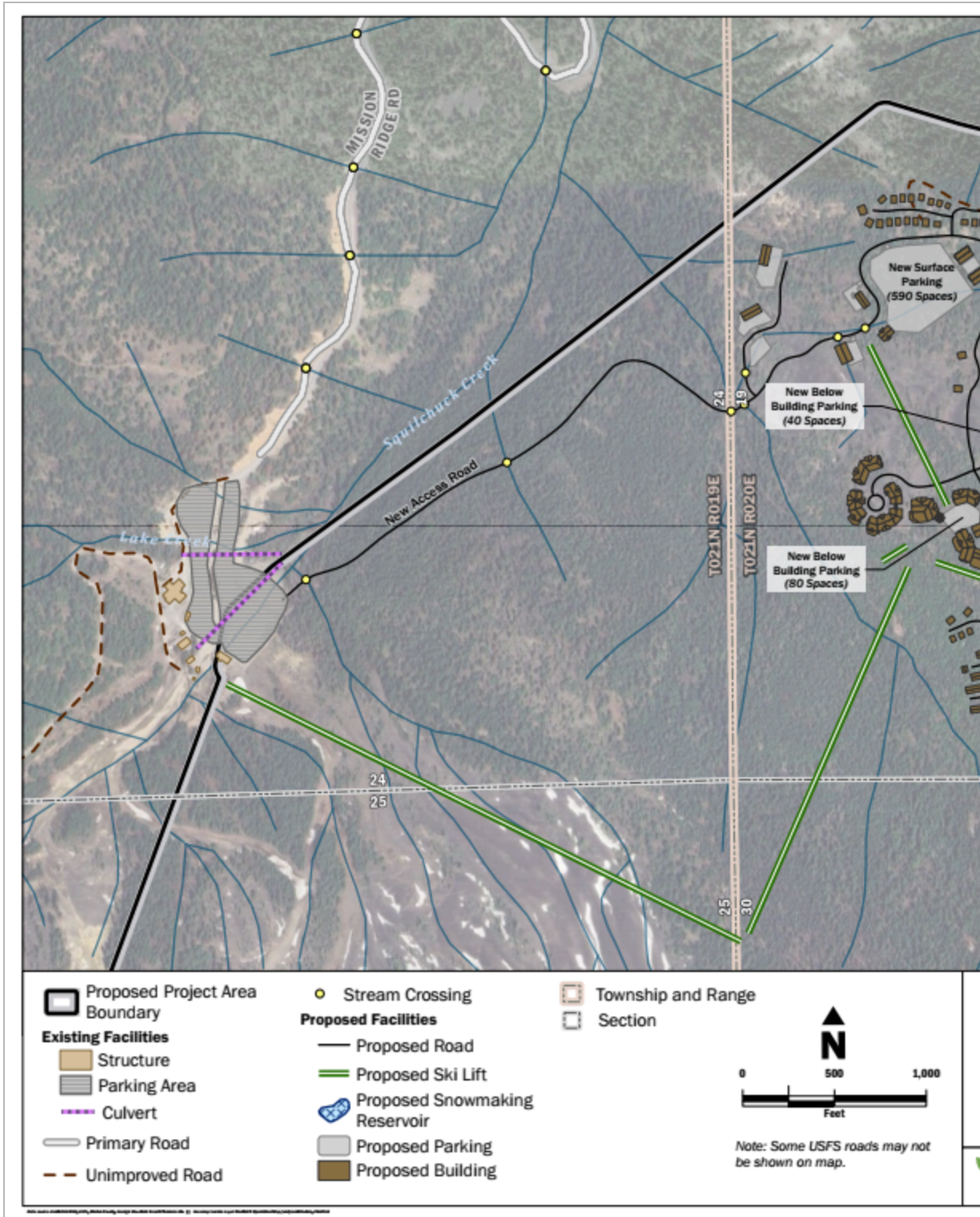
Section 5.3.1 - Surface Water Conditions:

The DEIS states “Table 5.3-1 provides a summary of stream characteristics within the Project Area.” but excludes Lake Creek which flows through a culvert in the project area.

Table 5.3-1. Project Area Surface Water Summary		
Resource Name	Resource Type	Project Area Resource Details ¹
Squilchuck Subwatershed		
Squilchuck Creek	Fish bearing, perennial stream ²	240 feet stream length 2.6 acres riparian habitat
Unnamed streams	Non-fish bearing, perennial streams ³	5,138 feet stream length 23.4 acres riparian habitat
	Non-fish bearing, seasonal streams ⁴	566 feet stream length 1.5 acres riparian habitat
	Non-fish bearing, unknown streams ⁵	52,466 feet stream length
	Unknown streams ⁵	1,357 feet stream length
Unnamed Stream	Non-fish bearing	2,400 feet stream length
Wetland 1	Category III,	0.23 acres
Wetland 2	Category III,	0.06 acres
Wetland 3	Category unknown	0.21 acres
Wetland 4	Category III	0.50 acres
Stemilt Subwatershed		
Orr Creek	Fish bearing, perennial stream ²	958 feet stream length 6.2 acres riparian habitat
Unnamed streams	Non-fish bearing, unknown streams ⁵	12,859 feet stream length
	Unknown streams ⁵	6,420 feet stream length

Snip from DEIS section 5.3.1 - Surface Water Conditions

DEIS Section 5.2.3.1, Direct Impact from Construction discusses building the new County Maintained driveway road through the Mission Ridge parking lot and across Squilchuck and Lake Creek, which are both diverted under the existing parking lot in culverts: “Construction of the proposed County-maintained access road, including possible replacement of existing culverts underlying the Mission Ridge parking lot, would be located within the wellhead protection area.” The Lake Creek and Squilchuck culvert are shown in purple in the graphic below.



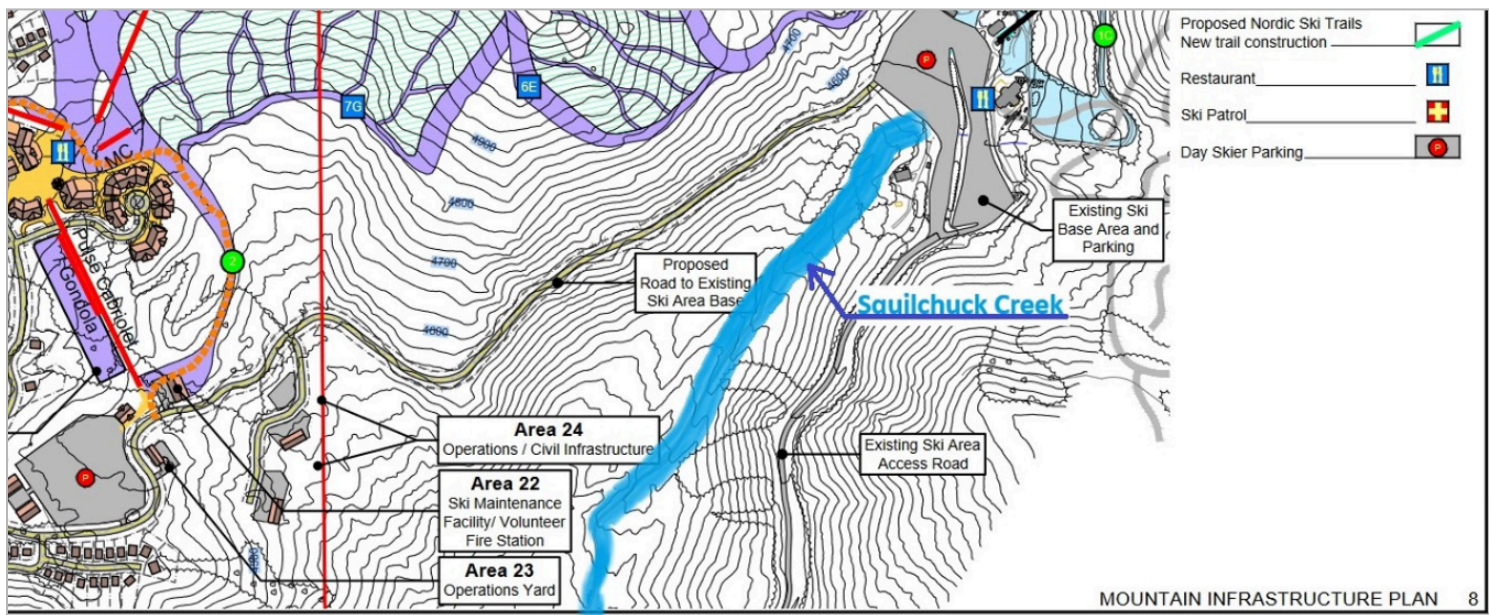
Snip from DEIS figure 5.6-3 - Proposed Transportation Infrastructure Improvements in and Near Project Area

Lake Creek is within the project area and is scheduled to be disturbed. Although possibly not formally classified as fish-bearing, an electro-shocking field study in 2007 resulted in the determination that a roughened fish passage channel would be required for a new Beehive Irrigation diversion structure at Lake Creek because the

creek is fish-bearing. **The DEIS should be revised to include Lake Creek in the Project Area Surface Water Summary. Lake Creek should be designated as a fish bearing perennial stream. If field studies are necessary for designation as a fish bearing stream, then those studies should be included in the DEIS process.**

Section 5.3.3.1 - Direct Impacts from Construction - Riparian habitat:

The DEIS states that *“impacts to perennial fish-bearing reaches of Squilchuck Creek may occur during construction in two areas, at the existing Mission Ridge parking lot and along the PUD utility corridor.”* Omitted are impacts to perennial fish-bearing Lake Creek at the existing Mission Ridge parking lot, and impacts to Squilchuck Creek along the first portion of the driveway access road as it exits the Mission Ridge parking lot, where the road is within 200 feet of Squilchuck Creek. There may be additional sections of the access road that encroach into the 200 foot buffer. Preliminary design of the access road will be required in order to determine what sections of road construction encroach into the 200 foot buffer. **The DEIS should be revised to include preliminary design of the access road in order to determine what sections of the road encroach into the 200’ buffer around Squilchuck Creek, and to include impacts to perennial fish-bearing Lake Creek at the Mission Ridge parking lot.**



Edited snip from [Revised Site Plans](#) showing proximity of proposed driveway road and Squilchuck Creek

Section 5.3.3.1 - Direct Impacts from Construction - Riparian habitat - Streamflow/water quantity:

The DEIS states:

“Streamflow/water quantity: Direct, construction-related impacts on streamflow/water quantity are expected to be minimal due to the following factors:

- 1. No surface water diversions would be used for construction water supply.*

This is an insincere argument. DEIS [section 5.2](#) indicates that the project will use 90 acre-feet of new net withdrawal of groundwater for construction related activity. The DEIS [Appendix E 2019 Mission Ridge Hydrology Memo](#) indicates that *“...deep bedrock fractures appear to be in hydraulic continuity with the surface waters near the ski area...”* Suggesting that surface water flows will not be affected because the project doesn't plan to use surface water diversions is dishonest. **The DEIS should be revised to remove the dishonest suggestion that streamflow impacts are minimal .**

Section 5.3.3.1 - Direct Impacts from Construction - Riparian habitat - Water Supply/Rights:

The DEIS states:

“No surface water from within the Project Area would be used and any groundwater use would rely on existing water rights (if authorized by Ecology) so would not impact existing and downstream water supply or water rights.

It is not true that groundwater use would not impact existing downstream water supply or rights. This argument is discussed in section [5.2 Water Quantity](#). **The DEIS should be revised to acknowledge the adverse impact during construction and during the early phases of the project caused by removing water from an already overallocated water budget. If groundwater is removed, then this is an unavoidable significant impact and therefore Section 5.3 Surface Water should be relocated from Chapter 5 to Chapter 4.**

Section 5.4 - Plants and Animals - Habitat Maps

The habitat maps referenced by the DEIS contain inaccuracies that result in incorrect conclusions throughout the Plants and Animals chapter. Specific inaccuracies include:

- *Figure 5.4-2 Elk and Mule Deer Range-Calving in Project Vicinity*: Evidence of mule deer wintering and fawning, and Elk wintering and calving was found during the [2024-2025 Mission Ridge Trail Camera Survey](#). This map fails to include mule deer and elk wintering, calving, and fawning activity in the project area.
- *Figure 5.4-3 Elk Summer Habitat in Project Vicinity*: This map reflects a wildlife habitat model that has not been ground truthed. This map indicates very little high value elk summer habitat in the project area. This does not correlate with habitat observation which is summarized in the [2024-2025 Mission Ridge Trail Camera Survey](#) in the “The map is not the Territory” section.
- *Figure 5.4-5 Invasive Species Infestation in Project Vicinity*: This map does not show the invasive weed infestation of diffuse knapweed (*Centaurea diffusa*) Canada thistle (*Cirsium arvense*) along the 7-year old “temporary road”. Also likely missing from this map are invasive weed infestations along the road system on Section 19 that extends onto Section 30.
- *Figure 5.4-6 Special Plant Features in Project Vicinity*: This map omits many greater than 32" DBH trees in FS Section 30 where ski runs, service roads, nordic trails, and a 4.2-million gallon snowmaking reservoir are proposed. Old growth east of the cascade crest is defined by trees greater than 21" DBH, yet this criteria is not mapped. PHS snags and logs are also not mapped.
- *Figure 5.4-7 SEPA Botany Existing Conditions in Project Vicinity*: This map does not show the invasive weeds discussed above for figure 5.4-5.

These maps should be updated with the best available science. Accurate elk and mule deer wintering, fawning and calving on the project area, elk summer use of the project area, extent of invasive weeds, eastside old growth forests, and PHS snags and logs should all be updated on these maps. **The DEIS should be revised to include the updated and revised habitat maps and all decisions based on these maps should be revisited and revised as informed by the updated information.**

Section 5.4.1 - Plants and Animals Overview - Pika and Wolverine

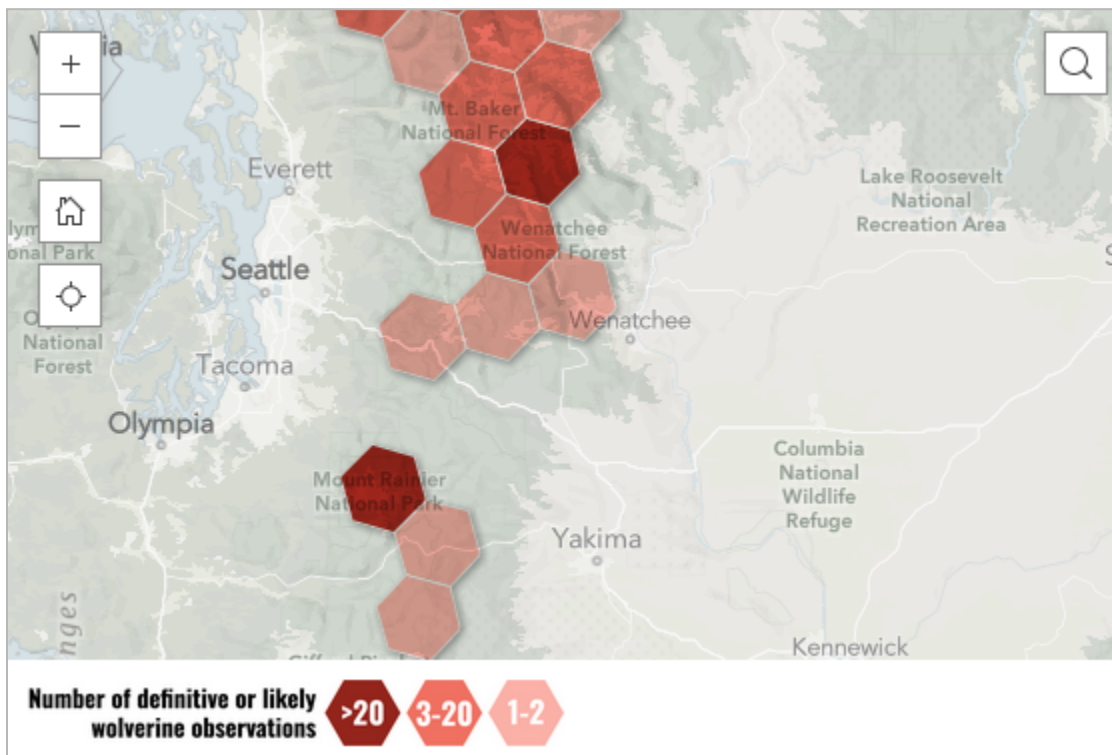
The DEIS presents plants and animals with special status in *Table 5.4-1: Terrestrial Special Status Species and Habitats that Potentially Occur Near the Study Area*. However, this table omits American Pika and wolverine (*Gulo gulo*), which both have special status and occur near the study area.

Pika are common throughout the project area, specifically within the core of the proposed high-density development area where talus pika habitat would be contoured, graded, and removed. This species is identified as a [Species of Greatest Conservation Need](#) (SGCN) under the State Wildlife Action Plan (SWAP).



An American Pika near the project area

Wolverines are an ESA threatened species and are identified as a [Species of Greatest Conservation Need](#) under the State Wildlife Action Plan. They are wide-ranging, covering up to [40 miles a day](#). A wolverine could easily travel from known sightings locations (Icicle Creek and the Stuart Range) and reach Mission Ridge in a day. In addition to being wide-ranging, dispersing sub-adults will often venture far outside of known home ranges to seek a mate or find unoccupied habitat. The abundance of pika, ground squirrels, marmots, and ungulates on the Mission Ridge makes it an excellent wolverine habitat. Mission Ridge has long-lasting north facing snow, and cold interstitial spaces in talus-boulder fields that could provide denning habitat. The 2024 discovery of an ice bug in talus on Section 30 highlights the presence of this cold habitat on Mission Ridge.



Wolverine sightings near the project area from the [Cascades Wolverine Project](#)

For wolverines in the Cascades, habitats outside the core of their range will become increasingly more important to dispersing juvenile wolverines. These adjacent habitats near core ranges offer habitat opportunities to individuals which allow increased genetic diversity and population for wolverines in the Cascades. **The DEIS should be revised to include American pika and wolverine in Table 5.4-1: Terrestrial Special Status Species and Habitats that Potentially Occur Near the Study Area.**

Section 5.4.1 - Plants and Animals Overview - Aquatic Plants and Animals

The DEIS states:

“Two non-fish bearing, perennial streams and three wetlands are located within the Project Area and one non-fish bearing perennial stream and one wetland are located in and adjacent to the Utility Corridor. The three wetlands in the project area are shown, south, central, and north wetland areas, respectively, on Figures 5.3-2a, 5.3-2b, 5.3-2c.”

This description omits a wetland near the loading area of the proposed chairlifts in Section 19 and a perennial non-fish bearing stream that originates on Section 30 near the proposed reservoir. These water bodies are also missing from Figure 5.3-3 “Surface Waters and Proposed Development”. **The DEIS should be revised to map and assess these missing water bodies.**



Drone photo of the third wetland

Section 5.4.1 - Plants and Animals Overview - Fish Species

The DEIS suggests that there could be three state priority species of fish using Squilchuck Creek:

*“Native fish species that are State Priority Species, and likely use the mainstem of Squilchuck Creek, include resident rainbow trout (*Oncorhynchus mykiss*), west slope cutthroat trout (*Oncorhynchus clarkii lewisi*), and mountain sucker (*Catostomus platyrhynchus*), which may occur in the upper reaches.”*

But admits that their presence is unconfirmed.

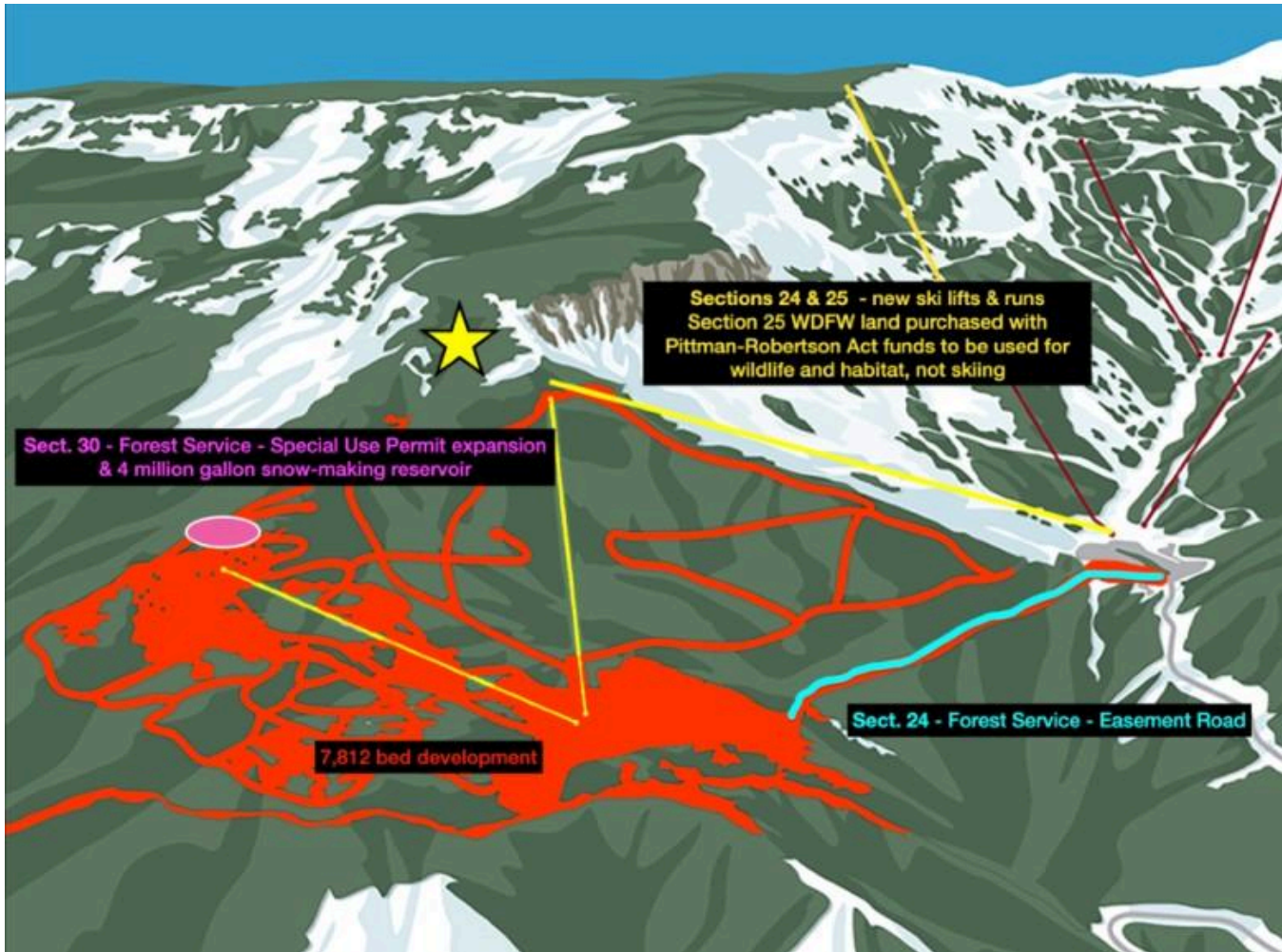
“However, their presence in the Project Area and proposed Utility Corridor expansion area has not been confirmed.”

Knowing whether these species are present at the project site is critical to the discussion of impacts and mitigation. An electro-shocking or E-DNA survey should be completed to identify or rule out the presence of these species. **The DEIS should be revised to remove speculation about the presence of State Priority Species of native fish by completing a study and reporting the results along with impacts and mitigation.**

Section 5.4.3.1 - Impacts from Construction - Commonly Occurring Terrestrial Animals - Suitable Habitat
The DEIS states:

“These adjacent lands contain potentially suitable habitat and migration corridors (e.g., riparian corridors) that are similar to habitats in the study area.” AND “...relatively abundant supporting habitat will remain in adjacent areas.”

This is not true. This suggests that the damage to plants and animals created by the proposed development simply takes a bite out of a much larger and homogeneous landscape. The habitat interrupted by the project is unique and irreplaceable. It is a heavily used migration corridor consisting of critical wildlife habitat including travel corridors, feeding area, bedding areas, fawn and calving zones, and ungulate breeding habitat. The area contains a diverse range of habitats including cool north-facing slopes, mature forests with complex horizontal structure and closed overhead canopy, old-growth forests interspersed with open grassy meadows, shrub steppe, springs, cliffs, talus, and aspen groves. The diversity of habitats allows for a diversity of wildlife species. For ungulates and larger mammals in particular, the abundance of talus fields (and cliffs) creates a barrier. Most large animals avoid traveling through the loose talus and seek firmer footing to avoid the cattle-guard-like danger of talus. Adjacent terrain, with compact soil, often contains well-used travel trails that serve as migration and travel routes across the landscape. The yellow star on the map below denotes a high-use travel corridor that is irreplaceable. A [2024-2025 Mission Ridge Trail Camera Survey](#) by Friends of Mission Ridge documents the wildlife and explains the critical nature of the project area lands. **The DEIS should be revised to remove unjustified statements declaring adjacent lands can replace the function of the areas disturbed by the proposed development.**



The yellow star above denotes an irreplaceable migration and travel route sandwiched between talus fields in both the Bowl 4 area to the west, and the Stemilt basin to the east (both shown here with snow hiding the talus).

Section 5.4.3.1 - Impacts from Construction - Commonly Occurring Terrestrial Animals - Talus

The DEIS acknowledges that talus is habitat for ectotherms:

"Typical habitat for ectotherms (species that use their environment to regulate their body temperatures) includes exposed rocky areas and talus..."

The talus within the project area is also used by American Pika. Pika haystacks have been documented within the proposed high-density development zone. Pikas seek refuge in talus from warming temperatures. The shaded areas in the crevices below these rocks can be up to 86°F cooler in the summer months. Meanwhile, summer surface temperatures in the talus patches surveyed in the North Cascades have increased by an average of roughly 0.67 degrees over the last decade. Most of the talus fields in Section 19 appear to be scheduled for grading and removal. This habitat destruction is not discussed and no mitigation is offered. **The DEIS should be revised to acknowledge that most of the talus field habitat in Section 19 will be destroyed and the impacts of this action should be assessed with mitigation offered.**

Section 5.4.3.1 - Impacts from Construction - Commonly Occurring Terrestrial Animals - Amphibians

The DEIS suggests that due to the limited areas of aquatic habitat,

"...the Proposed Project is likely to have fewer impacts on amphibians relative to other animal groups."

However, there are perennial streams, wetlands, and riparian areas throughout the project area. Two section 19 wetlands are scheduled to be filled. These wetlands are known amphibian breeding grounds. Western toads and

spotted frogs have been seen nearby and may be using these features. The DEIS wetland assessments are not accurate as they miss both a key wetland in the center of the section 19 development, and a perennial stream. Both may be impacted by construction activities. **The DEIS should be revised to include a better wetland assessment to accurately account for these missing waterbodies in order that the impacts from destroying these waterbodies can be assessed. In addition, an amphibian survey needs to be completed during the breeding season in order to confirm or rule out the presence of western toads and spotted frogs.**

Section 5.4.3.1 - Impacts from Construction - Commonly Occurring Terrestrial Animals - Summary

The DEIS summarizes the impacts on terrestrial animals without acknowledging any significance.

“Overall, construction impacts on commonly occurring terrestrial animal species are expected to occur. However, as noted previously, many animals will leave the construction area to avoid the disturbance and occupy similar adjacent habitats, which are relatively abundant in the study area and surrounding lands.”

There is no evidence that similar, abundant habitats exist in adjacent lands. The DEIS wildlife maps show that high quality elk habitat is limited in the area. The [2024-2025 Mission Ridge Trail Camera Survey](#) shows that cool, timbered, north-facing slopes are rare on Mission Ridge. Most of these north-facing habitats are interrupted with roads and the proposed project area contains one of the last intact patches of undisturbed habitat in this upper elevation environment. Nearby Section 17 was recently converted from an open forest where wildlife could move freely, to a fenced off orchard. Taken cumulatively, this shrinking of habitat reduces the size of animal populations, reduces genetic diversity, and causes impediments to migration and adaptation in the face of climate change and other pressures. Reducing habitat decreases animal resiliency. **The DEIS should be revised to acknowledge that habitat destruction has a significant impact and the assessment should include cumulative impacts including habitat destruction on nearby lands.**

Section 5.4.3.1 - Impacts from Construction - Commonly Occurring Terrestrial Animals - Special Status Terrestrial Plants and Animals

The following remarks are related to species discussed in *Table 5.4-2 Potential Construction Impacts on Special Status Terrestrial Species and Habitats*:

Whitebark Pine:

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



Widespread beetle kill on top of Mission Ridge, September 2025. New outbreaks of beetle kill are devastating stands of whitebark pine, lodgepole pine, and other tree species on the upper mountain.

Cascade Red Fox:

The DEIS states *“Cascade red fox unlikely to occur in or near the Project Area due to the location of the project being well east of primary habitat and outside of current and historic distribution”*. However, fox tracks were discovered in the project area during the winter of 2024/2025. **Further study is required to rule out the presence of cascade fox in the project area.**

Elk:

The DEIS acknowledges that the project will reduce elk habitat quality, impact elk movement, and displace elk, but then dismisses these impacts:

“1) Although elk habitat quality would change in the study area, those changes would be limited, 2) certain activities could be timed to reduce impacts (e.g., noise, human presence) during critical time periods such as elk calving and spring and fall migration, and 3) elk are highly mobile and capable of finding alternative routes between summer and winter ranges”

The impacts to deer and elk are not seriously studied in this document. A one-year, 19-camera [2024-2025 Mission Ridge Trail Camera Survey](#) in the project area showed that the elk habitat in and near the project area is unique and irreplaceable. Mule deer and elk are using this area regularly and in some years, year-round. This indicates that this habitat is the current best habitat for these animals. (If they wanted to be somewhere else they would). Winter use may be because this is not the best winter habitat, but the only habitat left for them. Perhaps premium wintering grounds (low snow, south facing, low disturbance lands) do not exist anymore for these animals and they are forced to pick secondary habitats like this? Another explanation could be that evolution has favored a variety of behaviors in the Colockum Elk and Mule Deer Herds. Some of the deer & elk migrate en masse to low elevation lands near the

Columbia or Colockum Wildlife areas, and others stay higher year-round. This may be an adaptive behavior that builds resiliency in the herds and helps disperse disease, pests, and predation. In the likely upcoming spread of deadly wildlife diseases like CWD and Hoof Disease, this diversity of habitats may be what allows these species to persist into the future. Cutting off migration corridors, destroying habitat, adding Steven's Pass level traffic, urban-style density into a rural and undeveloped upper basin will impact not only elk and deer but all the species that reside on these lands. [The impacts of roads and other infrastructure on mammal and bird populations: A meta-analysis](#) (Benítez-López et al., 2010) reviewed data from 49 studies on 234 species and shows that roads and infrastructure cause avoidance behaviors and reduced population densities in mammals (up to 5 km) and birds (up to 1 km), leading to biodiversity decline via habitat fragmentation and mortality. The impact from the proposed development on elk will be significant. **The DEIS should be revised to include the best available science in regards to impacts on elk near the project site. Additional studies are required.**

Pika:

Pika are missing from this table. **The DEIS should be revised to include discussion of the impacts to pika from construction of the proposed development.**

Western Toad:

The DEIS finds that *"potential impacts on western toad habitat are expected to be minimal."* This is not consistent with destroying wetlands on Section 19. Western toads have been found in nearby Squilchuck State Park. The wetlands of the project would be ideal habitat for western toads. A study during the breeding season is required to confirm or rule out their presence in the project area. **The DEIS should include further study with conclusive determination of the presence or absence of the western toad such that appropriate mitigation can be discussed.**

Dusky and sooty grouse:

The DEIS discusses riparian and wetland grouse habitat. The [2024-2025 Mission Ridge Trail Camera Survey](#) found high use Dusky grouse areas along ridgeline and the edges of talus fields. These areas need to be surveyed, mapped, and added to this analysis. **The DEIS should be revised to include additional grouse habitat discussion.**

Northern Goshawk:

The DEIS states: *"The study area has very little old forest structure and impacts to lower quality goshawk habitat would not negatively impact goshawk populations."* This is not accurate. A probable goshawk nesting site was located on multiple trips to the project area. Goshawks were documented during the breeding season on trail cameras in the [2024-2025 Mission Ridge Trail Camera Survey](#). The study area contains many large trees and complex, closed canopy, multi-layered forest. A survey of the east-side old growth forests within the project area is required to verify or rule out the presence of goshawk nesting sites. **The DEIS should be revised to more robustly address the presence of goshawk on the project area.**

American Martin:

The DEIS minimizes marten habitat potential and claims only minor habitat reduction: *"Suitable habitat for American marten is limited in much of the study area due to history of timber harvesting and forest management."* This is true of section 19, but not so on sections 30 and 25 where no stumps or old road beds are observed that might indicate past logging practice. Martin tracks were observed on section 25

during the 2024/2025 winter. **The DEIS should be revised to allow for Martin activity on the project area and to provide serious mitigation discussion.**



Martin tracks on section 25 during the 2024/2025 winter

Columbia Spotted Treefrog:

The DEIS declares that riparian and wetland areas are protected and any impacts would be mitigated through compensation. However, there is no mitigation offered for the destruction of wetlands in section 19. **The DEIS should be revised to include breeding season studies of the project area wetlands to determine whether Colombian spotted treefrogs are using these habitats. If they are, then compensatory mitigation is required and must be included in the DEIS.**

Other PHS Animal Species:

Regarding golden eagles, the DEIS finds: *“Because of the low probability of occurrence in the study area, there would be no effect to these species.”* The DEIS is wrong. The less than one-year [2024-2025 Mission Ridge Trail Camera Survey](#) found evidence of nesting golden eagles within the project area. Golden eagles are highly susceptible to human disturbance and would be negatively impacted by all aspects of the development. This study: [Nonmotorized recreation and motorized recreation in shrub-steppe habitats affects behavior and reproduction of golden eagles \(Aquila chrysaetos\)](#) found that

“Golden eagle territory occupancy, egg-laying, and nest survival were negatively associated with off-road vehicle use, pedestrian and other nonmotorized recreation, and short-term peaks in ORV use, respectively...Combined, these have cumulative effects on golden eagles that could result in population-level consequences through avoidance of otherwise suitable habitat, reduced egg-laying, and increased nest failure.”

The DEIS should be revised to consider impacts to golden eagles by disturbance from the development.



Immature golden eagle after taking a bath in an elk wallow on Section 25. June 13, 2025. Suggests that a nesting site could be nearby. The cliffs of Section 25 are a suitable nesting habitat.

Other PHS Animal Species:

Regarding roosting concentration of bats, the DEIS finds: *“Because of the low probability of occurrence in the study area, there would be no effect to these species.”* The DEIS is wrong. both species. Big brown bats, myotis bats, and pallid bats could be using the old growth and/or talus for roosting. Bats have been observed near the project site. There is significant literature on bats using talus for both non-hibernation roosting and as hibernacula.

1. [**Blejwas, K. M., Pendleton, G. W., Kohan, M. L., & Beard, L. O. \(2021\). The Milieu Souterrain Superficiel as hibernation habitat for bats: Implications for white-nose syndrome. Journal of Mammalogy, 102\(4\), 1110–1127. Summary: This study used radiotelemetry and acoustic monitoring in Juneau, Alaska, to show that little brown bats \(Myotis lucifugus\) hibernate in talus fields \(Milieu Souterrain Superficiel, MSS\) rather than caves, with eight of ten tracked bats using MSS hibernacula. These sites offer stable, cool microclimates \(near 100% humidity, temperatures warmer than ambient but below freezing at shallow depths\), reducing white-nose syndrome risks due to dispersed roosting.](#)

2. [**Moosman, P. R., Warner, D. P., Hendren, R. H., & Hosler, M. J. \(2015\). Potential for monitoring Eastern Small-footed Bats on talus slopes.](#) Northeastern Naturalist, 22(1), 1–13. Summary: This research piloted techniques to monitor Eastern small-footed bats (*Myotis leibii*) on Virginia talus slopes, finding bats roosting in shallow crevices from March to October. Mist-netting and visual searches confirmed talus as a key non-hibernation roost, with quadrat surveys estimating 196–343 bats in a 3-ha slope, suggesting talus as an alternative to cave hibernacula.
3. [**Moosman, P. R., Marsh, D. M., Pody, E. K., Dannon, M. P., & Reynolds, R. J. \(2020\). Efficacy of visual surveys for monitoring populations of talus-roosting bats.](#) Journal of Fish and Wildlife Management, 11(2), 597–608. Summary: This study evaluated visual surveys for Eastern small-footed bats (*Myotis leibii*) on Virginia talus slopes, confirming high detection probabilities for roosting bats in crevices. Talus surveys revealed bats using these sites over caves, with abundance varying by site characteristics, offering a viable monitoring method for rock-roosting species.
4. [**Gaulke, S. \(2018\). Bat hibernation in talus slopes.](#) University of Montana Conference on Undergraduate Research (UMCUR), 327(4). Summary: This undergraduate research in Montana used acoustic detectors on talus slopes to record bat activity (20 kHz and 40 kHz species) during winter, indicating hibernation in talus rather than caves. Limited recordings showed fall swarming and winter activity, suggesting talus as critical hibernacula for multiple bat species amid white-nose syndrome concerns.
5. [**Neubaum, D. J. \(2018\). Use of talus and other rock outcrops by bats in western Montana.](#) Montana Natural Heritage Program Report. Summary: This report documents radiotagged little brown bats (*Myotis lucifugus*) roosting in high-elevation talus fields in Colorado during autumn, likely for hibernation, with only 35% of cave/mine surveys finding bats. It suggests talus provides better habitat than caves in western Montana, though quantification is ongoing.

The DEIS should be revised to consider impacts to unique and preferred talus bat roosting and hibernating habitat. Acoustic monitoring studies will be required to determine use.

Aspen:

The DEIS inaccurately under-reports the size of an aspen stand to just under the threshold for priority habitat status:

“A small (0.9-acre) aspen stand would be partially eliminated during construction of the main access road. Because that stand is less than 1 acre in size, it does not meet WDFW’s definition of a priority habitat.”

This statement is wrong. The aspen stand is larger than one-acre. A drone flight mapped it at 1.7 acres. That measurement includes visible stems only and does not account for the root mass. The DEIS minimizes the impact on stand removal:

“The project would have no impact the local or regional aspen population.”

"Local or regional impacts" is not the criteria for measuring impacts under SEPA. "Significant impacts" is the key quality to measure. WAC 197-11-794 defines "significant" and indicates that determination of significance requires context and there is no quantifiable test. A process is referenced for determining whether a proposal is likely to have a significant adverse environmental impact. That process should be referenced and followed to determine the significance of removal of a portion of the priority habitat aspen stand on section 19. **The DEIS should be revised to include the determination of whether this aspen removal is significant and the DEIS should correct the size and priority habitat designation of the aspen stand.**

Old Growth Forest:

East-side old growth forest criteria are shown on [Table 14 - Pacific Northwest Region old-growth criteria outside the Northwest Forest Plan area](#) (pg 42) from the [2023 USDA Mature and Old-Growth](#)

[Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management](#). The plan area contains Forest Inventory and Analysis (FIA) site class 3 habitat, in which old-growth criteria includes:

- Douglas Fir, 8 trees per acre greater than 21" diameter at breast height (dbh)
- Ponderosa Pine, 3 trees per acre greater than 31" dbh
- Ponderosa Pine, 13 trees per acre greater than 21" dbh

This condition is found on sections 19 and 25 and 30 including the site of the proposed snowmaking reservoir, but is not included in the DEIS. **The DEIS should be revised to include an inventory of old-growth forest on the project area and an assessment of the impacts of loss of old-growth forest habitats on Section 19 and 25.**

Talus:

The DEIS minimizes the impacts of talus field destruction:

"Due to the large extent of talus habitat present in the Project Area and the lack of impacts expected on wildlife species associated with talus, overall impacts are expected to be minor."

Judging the impacts as minor is premature when the impacted species are unknown and not included in the DEIS. **The DEIS should be revised to include a discussion of impacts to talus residents which may include roosting bat colonies, pika, and larch mountain salamanders. A study will be required to identify resident species.**

Migratory birds:

The DEIS recognizes habitat reduction due to tree removal, but fails to acknowledge impacts from light and noise pollution or glass collisions which kill migratory birds. **The DEIS should be revised to consider the impacts on migratory birds from light pollution, noise pollution and glass strikes from nearly 1000 new residential units plus commercial space and other buildings. The DEIS should offer mitigation strategies to compensate for these impacts.**

Section 5.4.3.1 - Impacts from Construction - Summary of Impacts from Construction

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

Section 5.4.3.3 Permit-required Mitigation Measures

Item 7 of this section states:

"Impact analyses relative to elk will apply the best available science as identified by WDFW, through the elk habitat model and recently completed literature review (Gaines et al. 2020)."

Habitat models are theoretical and require ground truthing. The current habitat model and literature review do not match the on-the-ground conditions found in the [2024-2025 Mission Ridge Trail Camera Survey](#) and therefore do not represent the best available science. Additional ground study is required. **The DEIS should be revised to update the elk habitat maps with the best available science.**

Section 5.4.4 Significant and Unavoidable Adverse Impacts

The DEIS states:

“Through compliance with laws and with implementation of the mitigation measures described in Sections 5.3 (Surface Water) and 5.4 (this section), there would be no significant and unavoidable adverse impacts on terrestrial and aquatic habitats and species from construction or operation of the Proposed Project.”

This assessment is incomplete and false. The actual impacts from construction and operation were not fully examined in chapter 5.4. SEPA requires agencies to consider context and intensity, including site-specific habitat loss, fragmentation, and cumulative/long-term effects, and may find significance where a project degrades critical areas, sub-herds, local breeding/roosting sites, or key movement corridors. SEPA requires agencies to consider short-term, long-term, and cumulative impacts, including those likely to arise or exist over the lifetime of a proposal (in this case, a 20-year construction phase, and decades beyond in the operation phase). Agencies should not limit their review to only the impacts within their own jurisdictional boundaries. In this case, only impacts to Chelan County are considered, where this project's light pollution, wildlife, recreation, and wildfire impacts would extend into neighboring Kittitas County.

The applicant's dismissal of impacts is consistently framed in two arguments:

1. This won't cause population-level impacts
2. There is adequate adjacent habitat

The applicant does provide evidence for these claims, and this is not what SEPA asks for. This dismissive language undermines the EIS process, giving a false sense to readers of the EIS that the project would cause minimal impacts, while offering no true mitigation for the proposed actions and impacts.

The goal of mitigation is no net loss of ecological function. To achieve this, the sequence is first to avoid impacts, if impacts can't be avoided, they must be minimized, and if there is no way to minimize the impacts, then compensation is required. This harm reduction sequence is rarely engaged in the Plants and Animals chapter of the DEIS. The document either minimizes, or fails to acknowledge impacts. **The DEIS should be revised to include the additional studies discovered through the public comment process in order to correct erroneous information and to provide an accurate assessment of the project's impacts. Once the impacts are understood, appropriate mitigation efforts can be proposed.**

Section 5.5 - Energy and Natural Resources

Section 5.5.4.1 Direct Impacts from Construction - Open Space

The DEIS states:

“...the Proposed Project not only preserves open space, but also increases public access to open space.”

This may be true for a small motorized summertime subset of recreationalists who access the Stemilt basin via primitive roads from the development. However, as discussed in [Section 5.10.3.2 Recreation Impacts from Operation](#), Extending the boundaries of the ski area's special use permit will effectively newly established winter non-motorized area in the upper Stemilt Basin. The [uphill route](#) to Stemilt that is described on the Mission Ridge website will become unusable because the path from the parking lot will now be directly beneath a new chairlift and within the expanded Special Use Permit area. Unilaterally declaring that the project increases public access to open space is irresponsible. **The DEIS should be revised to discuss negative effects on public access and this statement should either be corrected or deleted.**

Section 5.5.4.1 Direct Impacts from Construction - Forest and Water Resources

The DEIS states:

“Construction of the Proposed Project would have potential impacts to surface waters, including Squilchuck Creek and tributaries to Squilchuck and Stemilt creeks.”

“In summary, ... there would not be probable significant adverse construction-related impacts on... forest and water resources... from the Proposed Project.”

This is nonsensical. There are potential impacts, therefore there are no impacts? The DEIS should be revised to acknowledge the negative impacts to waters including the actual physical impact to senior water rights holders downstream of the development. [Section 5.2 Groundwater](#) and section [5.3 Surface Water](#) discuss the negative impacts caused during construction and operation on the already overallocated water budget should the developer be allowed to remove water from the headwaters of the Squilchuck Basin. **The DEIS should be revised to acknowledge the issues discussed in those sections and Section 5.5.4.1 should be updated to recognize these significant negative impacts.**

Section 5.5.4.3 Direct Impacts from Operation - Energy Supply and Demand

The DEIS indicates that the proposed project intends to use power from the existing Squilchuck power lines until the capacity is completely used up.

“The Chelan PUD’s existing Squilchuck substation would provide power to the Proposed Project for Phase 1 and a portion of Phase 2, until the demands from organic growth and the Proposed Project meet the available existing capacity.”

Once the existing capacity is used up, new power lines and a new substation will be required. Discussion of those system improvements are not included in the DEIS and are delegated to the PUD for future long range planning. [Chelan County Code section 11.89.050\(10\)](#) on Master Planned Resorts requires that any capacity increases required to support the development must be paid for by the development:

*“Existing public service purveyors may provide services as long as the costs related to service extensions and any capacity increases generated by the development **are borne by the development** and such extensions do not promote sprawl or urban level of development adjacent to the MPR.”*

[Section 11.89.040\(8\)](#) of the MPR code indicates that if the utility is not installed prior to occupancy, it must be bonded to 150% of the estimated costs.

“(8) All required public improvements including roads, utilities and public facilities that are part of the approved site plan and narrative shall be completed prior to issuance of a certificate of occupancy by the building official or installation guaranteed by the posting of performance bonds or other surety acceptable to the prosecuting attorney in an amount of one hundred fifty percent of the estimated cost of the outstanding improvements...”

The DEIS should be revised to clarify that the costs for any short term capacity improvements to allow power for project phases 1 and 2, and all costs associated with permitting, SEPA, design and construction of new power lines, substations and any other infrastructure associated with new capacity to power the development, must be borne by the development.

Further, substation design and construction is a multi-year process. If a new substation is required for phase 2, its planning should be underway during phase 1 construction in order not to create construction delays. However, the DEIS delegates power planning for phases 3-5 to others with no schedule mentioned. Power planning delays could cause significant construction delays. **The DEIS should be revised to discuss the impacts of potential significant construction delays caused by poor power planning.**

Section 5.6 - Transportation

Section 5.6.3.1 Direct Impacts from Construction - City of Wenatchee, Squilchuck Road Corridor, Chelan PUD Easements - Road Design

The DEIS discusses construction of the proposed access road.

“The proposed access road would be located on USFS and privately-owned property and constructed during Phase 1. Preliminary design indicates the cut slope would be at a 1:1 ratio and may reach heights of up to 180 to 200 feet. The fill slopes would predominantly consist of retaining walls that would range in height from about 8 to 20 feet. The entire access road corridor, including the roadbed, all cut and fill slopes and turnouts, would cover approximately 25-acres”.

However, no preliminary design is provided for review. In order to justify the declared cut and fill heights, assess corridor disturbance area, and understand the magnitude of ground disturbance, **the DEIS should be revised to**

include preliminary proposed access road design through the existing Mission Ridge Parking lot and across USFS land to the development. The design should be in accordance with chapter 15 of the 6th edition of the Highway Capacity Manual and provide LOS B at full buildout with safe routes for bikes and pedestrians between the development and the ski area (see [Section 5.6.3.3 Direct Impacts from Operation - New Public Access Road](#) for discussion). The design should include cut and fill volumes, where cut is proposed to be disposed of, layout across the Mission Ridge parking lot, and proposed alignment including turnouts.

Section 5.6.3.1 Direct Impacts from Construction - City of Wenatchee, Squilchuck Road Corridor, Chelan PUD Easements - Lake Creek Fish

The DEIS discusses construction of the proposed access road through the existing Mission Ridge parking lot and across USFS land to the development.

“The access road would cross the Squilchuck Creek (fish-bearing) and Lake Creek culverts located under the Mission Ridge parking lot.”

The DEIS identifies Squilchuck Creek as fish bearing but fails to identify Lake Creek as fish bearing. Lake Creek bears fish. In 2008, as part of Beehive Reservoir fill-works improvements, Beehive Irrigation District replaced its Lake Creek dam and diversion structures at Lake Creek. At that time, WDFW determined that Lake Creek is a fish bearing stream, and required Beehive to install a roughened fish passage at their Lake Creek dam. This fish passage channel can be seen looking uphill from the Pipeline trail at the Lake Creek crossing. **The DEIS should be revised to acknowledge that Lake Creek is a fish-bearing stream.**



Photo of Lake Creek dam during construction. The fish passage channel is on the left side of the photo.

Section 5.6.3.1 Direct Impacts from Construction - City of Wenatchee, Squilchuck Road Corridor, Chelan PUD Easements - HPA Requirements

Both Lake Creek and Squilchuck Creek have been buried in culverts under the Mission Ridge Parking lot. The project proposes to construct a County highway through the parking lot and across these streams. The DEIS discusses culvert inspection requirements as:

Chelan County will also require the Applicant to provide a hydraulic analysis of the existing condition to determine whether the culverts are properly sized. An engineering report would describe the identified deficiencies, expected lifespan, and other factors. If the culverts are found to be in poor condition, undersized, or otherwise proposed to be replaced, Chelan County will require the culverts to be replaced in a manner consistent with current regulations (CCC 13.16 and 15.30; WDFW 2013 Water Crossing Design Standards; DOE Stormwater Management Manual for Eastern Washington).

Culvert repair for fish bearing stream crossings must also be in accordance with WAC 220-660-190 which requires “An HPA is required for all construction or repair/replacement of any structure that crosses a stream, river, or other water body regardless of the location of the proposed work relative to the OHWL of state waters”. **Since Lake Creek is a fish bearing stream, the DEIS should be revised to indicate that both stream crossings in the Mission Ridge parking lot will require an HPA.**

Section 5.6.3.3 Direct Impacts from Operation -Traffic Impact Analysis - Pitcher/Squilchuck Mitigation

The DEIS discusses a level of service (LOS) analysis called a traffic impact analysis (TIA) that analyses current conditions, future baseline conditions (the future without the development), and the future condition with the development. The engineering report is included in the DEIS in [appendix I](#). The DEIS discusses the results of the TIA based on County minimum acceptable LOS criteria. LOS C is the County adopted minimum standard for rural roads. LOS D is worse than C and is not allowed. The TIA finds that the Pitcher Canyon/Squilchuck Road intersection will operate at level of service D but recommends against mitigation because the number of cars on Pitcher Canyon is low. This recommendation is irresponsible and violates the goals of Chapter 4 - Transportation Goals and Policies of the Transportation Element of the [2017-2037 Chelan County Comprehensive Plan](#).

Chapter 4 GOAL 1 - MAINTAIN WHAT WE HAVE

Goal 1.8 “...preserve the level of service and operations of the existing county road system” and

Goal 1.9 “...deny approval of any development proposal that would cause a roadway segment to fall below the adopted minimum level of service...”

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

The DEIS proposes to violate Goal 1.9 by proposing that even though the intersection LOS falls below the adopted minimum level of service, that mitigation should not be done.

[Chelan County Code 11.89.040\(8\)](#) General Requirements for Master Planned Resorts requires that:

“(8) All required public improvements including roads, utilities and public facilities that are part of the approved site plan and narrative shall be completed prior to issuance of a certificate of occupancy by the building official or installation guaranteed by the posting of performance bonds or other surety acceptable to the prosecuting attorney in an amount of one hundred fifty percent of the estimated cost of the outstanding improvements, except that all life/safety improvements must be installed and in operation prior to occupancy.”

Mitigation is required. **The DEIS should be revised to clarify that LOS D is unacceptable and that mitigation to the Pitcher Canyon/Squilchuck road is required and further that all mitigation must be complete or bonded prior to issuance of a single occupancy permit.**

Section 5.6.3.3 Direct Impacts from Operation -Traffic Impact Analysis - Mitigation Costs

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

Table 9: 2023 and 2034 Saturday PM Peak-Hour Level of Service Summary

Intersection	Control Type	2023 Existing Conditions		2034 Baseline Conditions		2034 Future w/ Development Conditions	
		LOS	Delay	LOS	Delay	LOS	Delay
13. Squilchuck Road at Methow Street	Minor-Leg Stop-Cont.	A	9.9 sec Eastbound	B	10.3 sec Eastbound	C	18.5 sec Eastbound
14. Squilchuck Road at Pitcher Canyon Road	Minor-Leg Stop-Cont.	B	12.2 sec Eastbound	B	13.2 sec Eastbound	D	34.2 sec Eastbound
2034 Improvements	Channelization	-	-	B	12.0 sec Eastbound	C	19.0 sec Eastbound
15. Squilchuck Road at Wen. Heights Road	Minor-Leg Stop-Cont.	B	11.0 sec Westbound	B	11.5 sec Westbound	C	18.2 sec Westbound

Clip from 2025 Kimley Horn TIA showing that 2034 baseline conditions do not require intersection improvements.

Section 5.6.3.3 Direct Impacts from Operation - Traffic Impact Analysis - Unstudied Intersections

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

Section 5.6.3.3 Direct Impacts from Operation - Squilchuck Road Corridor

The DEIS presents two road capacity analysis approaches that were analyzed in the [2025 Kimley Horn Traffic Impact Analysis Report](#). These include an alternative v/c (volume over capacity) approach, and the traditional Highway Capacity Manual approach. The Kimley Horn traffic analysis is faulty for both methods.

v/c method:

Kimley Horn equated acceptable traffic levels on SR-97A (the highway between Wenatchee and Entiat) with acceptable traffic levels on Squilchuck and Mission Ridge Road, and directly compared traffic flows using SR-97A numbers to determine future Level of Service for Squilchuck Road. The TIA states:

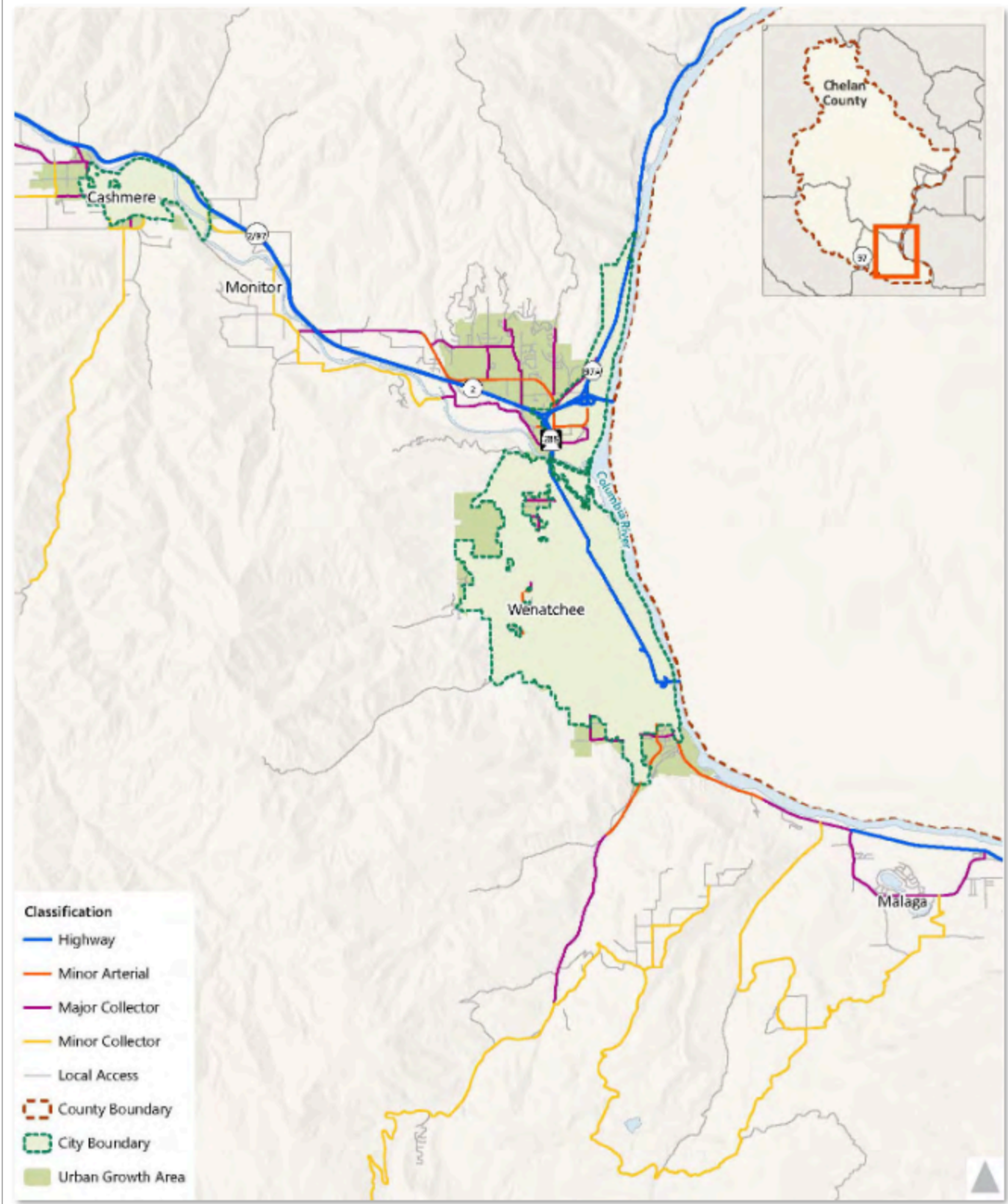
“The Comprehensive Plan identifies capacities of 770, 1,530, 2,170, and 2,990 total peak-hour trips being equivalent to LOS B, LOS C, LOS D, and LOS E, respectively, for SR-97A. This is the most representative roadway for Squilchuck Road since it is a rural 2-lane highway.”

This comparison is not appropriate. The capacity of SR-97A is significantly greater than the capacity of the Mission Ridge Road. A comparison of the two roads illustrates this difference:

	SR-97A	Mission Ridge Road
Passing ability	Mostly unobstructed	0% passing ability
Shoulder width	7 feet	18 inches
Road alignment	Straight	Curvy
Speed Limit	60mph	25mph Winter / 35mph summer
Grade	Flat	Over 7% average grade
Road Classification (see figure 6 below)	Highway	Minor Collector ⁽¹⁾

Footnotes: (1) Mission Ridge Road and Squilchuck Road will likely be reclassified from collector to arterial after construction of the development since they will then interconnect the trip generating locations of Wenatchee and the 7812 pillow development.

Figure 6. Roadway Functional Classification (Cashmere/Monitor and Wenatchee/Sunnyslope Vicinity)



Snip from Figure 6. Roadway Functional Classification from the Transportation Element of the 2017 Chelan County Comprehensive Plan showing SR97a as a highway, and Mission Ridge Road as a minor collector

Clearly the Mission Ridge Road capacity is lower than SR-97A's capacity. A direct comparison of vehicle flow on the Mission Ridge Road to Chelan County accepted LOS at various vehicle flow rates on SR-97A is meaningless.

Highway Capacity Manual method:

The HCM method determines percent-time-spent-following (PTSF) at the flow rates predicted by Kimley Horn. The HCM provides a table for determining expected level of service (LOS) based on PTSF.

LOS	Class I Highways		Class II Highways	Class III Highways
	ATS (mi/h)	PTSF (%)	PTSF (%)	PFFS (%)
A	>55	≤35	≤40	>91.7
B	>50–55	>35–50	>40–55	>83.3–91.7
C	>45–50	>50–65	>55–70	>75.0–83.3
D	>40–45	>65–80	>70–85	>66.7–75.0
E	≤40	>80	>85	≤66.7
F	Demand exceeds capacity			

Note: For Class I highways, LOS is determined by the worse of ATS-based LOS and PTSF-based LOS.

Exhibit 15-3 Motorized Vehicle LOS for Two-Lane Highways from HCM version 6.0

If the highway meets base conditions, then PTSF can be directly read from HCM exhibit 15-2(b) which correlates directional flow with PTSF.

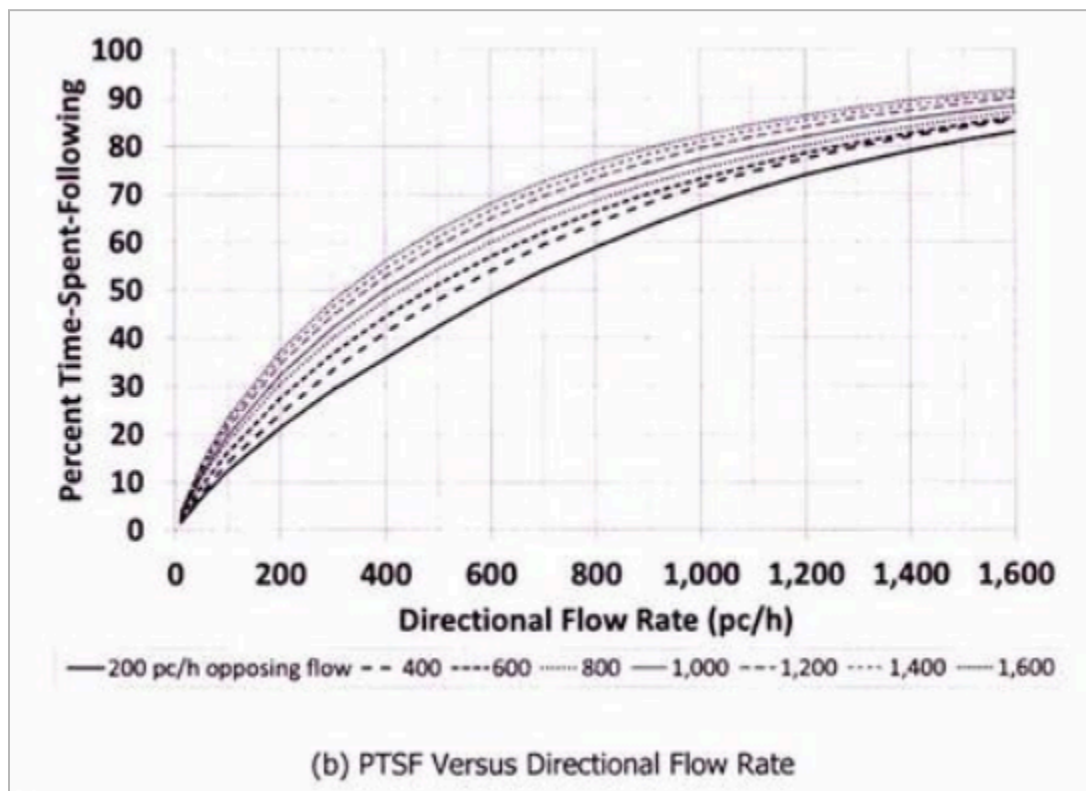


Exhibit 15-2(b) from HCM version 6.0

Base conditions include:

- Lane widths greater than or equal to 12 ft

- Clear shoulders wider than or equal to 6 ft
- No no-passing zones
- Level Terrain
- No turning vehicles

The various curves on the above chart reflect the ability to pass. (If you can pass, you will spend less time following a slow vehicle. If you can't pass, you will spend more time following a slow vehicle.) However, these curves are meaningless in the situation where passing is not possible because of geometric constraints of the road, as exist on the Mission Ridge Road where no passing is possible.

When the highway does not meet base conditions, the HCM offers a more complex method of converting vehicles-per-hour to PTSF with a formula that considers an adjustment for no-passing-zones.

Step 6: Estimate the PTSF

This step is only required for Class I and Class II two-lane highways. Class III highways do not use PTSF to determine LOS, but users may apply this step if PTSF is a desired output of the analysis.

Once the demand flows for estimating PTSF are computed, the PTSF is estimated with Equation 15-9:

$$PTSF_d = BPTSF_d + f_{np,PTSF} \left(\frac{v_{d,PTSF}}{v_{d,PTSF} + v_{o,PTSF}} \right)$$

Equation 15-9

where

$PTSF_d$ = percent time-spent-following in the analysis direction (decimal);

$BPTSF_d$ = base percent time-spent-following in the analysis direction, from Equation 15-10;

$f_{np,PTSF}$ = adjustment to PTSF for the percentage of no-passing zones in the analysis segment;

$v_{d,PTSF}$ = demand flow rate in the analysis direction for estimation of PTSF (pc/h); and

$v_{o,PTSF}$ = demand flow rate in the opposing direction for estimation of PTSF (pc/h).

The base percent time-spent-following (BPTSF) applies to base conditions and is estimated by Equation 15-10:

HCM V6.0 Equation 15-9 for determining PTSF for non-base conditions such as Mission Ridge Road

The Kimley Horn analysis inappropriately assumed base conditions and used Exhibit 15-2(b) to determine PTSF. The results presented in the 2025 TIA are meaningless as they assume the ability to pass in the opposing lane, where this is not possible on the Mission Ridge Road. Appropriate analysis using equation 15-9 shows LOS D for weekday traffic in 2034 (post phase 3) which is unacceptable. Mitigation is required but is not identified in the DEIS. For context, the TIA predicted new trips generated from the development are about twice the [WSDOT](#)

[traffic count](#) for 2024 average daily trips on both Stevens Pass near Yodelin and on Hwy 97 Blewit Pass, and roughly equal to the AADT on both State Route 28 between Rock Island and Quincy, and hwy97 (SR 2) just north of East Wenatchee. **The DEIS should be revised to include an updated TIA that utilizes appropriate calculation methods to determine LOS. When the updated report indicates for all 2034 cases that LOS falls below C, then appropriate mitigation should be required. The costs for this mitigation should be borne by the development.**

Total Locations: 2 View All	
Location ID:	CS06929
Located On:	On SR 002, S/O Yodelin Pl Intersection
Direction:	2-WAY
AADT:	5346 (2024)
NB Count:	2735 (2024)
SB Count:	2611 (2024)
View Detail in a New Search	
Location ID:	CS09855
Located On:	On SR 002, N/O Yodelin Pl Intersection

WSDOT 2024 SR 2 (Stevens Pass) near Yodelin

Location ID:	CS02045
Located On:	On SR 097, E/O Scotty Cr Rd-Fs Rd #9716 Intersection
Direction:	2-WAY
AADT:	5836 (2022)
View Detail in a New Search	

WSDOT 2024 HWY 97 Blewit Pass

Location ID:	CS09477
Located On:	On SR 028, S/O Cro Rd Intersection
Direction:	2-WAY
AADT:	10511 (2024)
NB Count:	5175 (2024)
SB Count:	5335 (2024)
View Detail in a New Search	

WSDOT 2024 SR 28 between Rock Island and Quincy

Location ID:	CS12708
Located On:	On SR 002, N/O NE Cascade Ave Intersection; NW Cascade Ave Intersection
Direction:	2-WAY
AADT:	11106 (2024)
NB Count:	5696 (2024)
View Detail in a New Search	

WSDOT 2024 SR 2 between East Wenatchee & Baker Flats.

{{note to Chelan County regarding Kimley Horn HCM Calculations: When the TIA is revised, the HCM calculations shown on TIA tables 12 and 13 should be backchecked by an engineer familiar with HCM chapter 15 calculations. The tables show incorrect Heavy Vehicle Factor selections, incorrect selection of passenger car equivalents for trucks (Et), (due to bad road grade assumptions), and incorrect calculation of passenger car equivalents which are underestimated due to calculating pc/hr as simply veh/hr divided by PHF.}}

Section 5.6.3.3 Direct Impacts from Operation - New Public Access Road

Although not discussed in the traffic section of the DEIS, the new public access road is proposed to be 28 feet wide. This is introduced in the 2019 Aegis Fire Protection Plan where [Chelan County Code section 15.30.230\(4\)\(B\)](#) is cited, which specifies that when secondary access is not provided, then the minimum traveled surface road width must be 28 feet wide. References throughout the DEIS to this single access road use the phrase “*single wider*” access road, which implies that the proposed design exceeds County requirements. This is not true. The 28 foot minimum is for any development without interconnectivity. A 28 foot width may exceed the access roadway requirements for a 3 lot subdivision, but this development is not that. As discussed in the

section above, the existing 28 foot wide Mission Ridge Road is inadequate to support projected traffic within the minimum adopted rural level of service set by Chelan County. The proposed access road is a rural connector. The Transportation Element of the [2017-2037 Chelan County Comprehensive Plan](#), Chapter 4, Goal II - PROVIDE A SAFE SYSTEM - requires design in accordance with Chelan County Code section 15.30 which requires Rural Collectors up to 4000 ADT to have a paved width of 32 feet.

Table 15.30-4

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

Snip from CCC15.30.240

However, the new road will have 10,000 ADT, more than twice the table's maximum range. For two-lane highways outside the prescriptive scope of CCC15.30, design must be in accordance with federal or state design guidelines.

In addition, Goal 2.6 of Chapter 4 GOAL 2 - PROVIDE A SAFE SYSTEM of the Transportation Element of the [2017-2037 Chelan County Comprehensive Plan](#) requires "Include specific provisions for non-motorized travel in the design of all new... transportation facilities...". Therefore, the proposed new access road should be designed with safe biking and walking accommodations. Chapter 4 GOAL 1 - MAINTAIN WHAT WE HAVE Goal 1.8 requires: "...preserve the level of service and operations of the existing county road system". The current level of service is A or B and new roads should be designed to accommodate expected traffic at a level of service better than the minimum County adopted standard. The proposed new access road should be designed to operate at LOS B minimum.

The DEIS should be revised to provide preliminary design of the proposed access road in accordance with Chapter 15 of the 6th edition of the Highway Capacity Manual to demonstrate LOS B under full buildout conditions with both bike and walk safe routes along the road between the development and the ski area. To achieve this level of service, passing lanes or multiple lanes in each direction may be required. The incorrect and persuasive reference to a single "wider" road should be deleted throughout the DEIS unless the developer chooses to construct the road wider than the HCM design dictates.

Section 5.6.3.3 Direct Impacts from Operation - Summary of Impacts from Operation

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

of this development are both significant and unavoidable. **The DEIS should be revised to list and discuss the impacts from operation.**

Section 5.6.3.5 Proposed Mitigation Measures:

The DEIS proposed mitigation measures include the following:

“Monitoring of weekday peak hour and Saturday peak hour at the S. Mission Street at Stevens Street intersection will be conducted following completion of Phase 1 and Phase 2 of the project to determine if additional analysis of signal timing adjustments or other mitigation improvements are required to maintain LOS D operation and to address individual intersection movements that are experiencing queuing.”

“The timing for the addition of an acceleration lane at Squilchuck Road at Pitcher Canyon Road will be evaluated through additional monitoring. Squilchuck Road capacity will be monitored after each Phase of the project. Additional mitigation will be required based on monitoring results.”

“A Supplemental TIA will be completed after Phase 3 is completed and occupied to identify the cumulative impacts of the Proposed Project on local traffic. The Supplemental TIA will be funded by the Applicant and completed in coordination with Chelan County and consulting agencies. The Supplemental TIA will include new traffic counts, updated trip generation and distribution, and additional required mitigation measures as appropriate based on the updated assessment of project-related traffic impacts. Mitigation measures will be based on the cumulative transportation impacts of the development (Phases 1-5).”

Delayed mitigation for S. Mission Street at Stevens Street, Squilchuck Road at Pitcher Canyon, Squilchuck Road, and S. Mission Street at Crawford (not mentioned in this section) puts the community at risk. It is entirely possible that the developer could complete phases 1, 2, and 3, and then decide that the mitigation cost to complete the final phases is too costly or not worth his effort. In that case, the community would be stuck with below acceptable level transportation intersections and roads, without any mitigation contribution from the developer. **The TIA should be revised to require that all mitigation for all phases should be required prior to the issuance of any certificate of occupancy, or guaranteed by performance bonds of 150% the estimated cost of the mitigation.**

Specific Examples follow:

5.6.3.5a1 - S. Mission Street and Stevens street mitigation plan is inconsistent with Chelan County Code.

The 2034 (after phase 3) baseline level of service projection for the S Mission Street and Stevens Street intersection is LOS C. The 2034 “future with development conditions” LOS projection is E. (See TIA table 7 below)

The developer is not obligated to construct phases 4 or 5. If construction stopped at this point, this intersection would be operating below LOS D as a direct result of the development and no mitigation would have been accomplished. The TIA section 5.1 recommends *that “Improvements for the 2043 horizon year conditions should not be a condition of the Development since the actual growth could be lower,…”*

Mitigation is for projected impacts and this argument to wait and see what really happens is inconsistent with the [MPR section 11.89.040](#) requirement that

“(8) All required public improvements including roads, utilities and public facilities that are part of the approved site plan and narrative shall be completed prior to issuance of a certificate of occupancy by the building official or installation guaranteed by the posting of performance bonds or other surety acceptable to the prosecuting attorney in an amount of one hundred fifty percent of

the estimated cost of the outstanding improvements, except that all life/safety improvements must be installed and in operation prior to occupancy.”

Mitigation of this intersection should be required prior to the issuance of any certificate of occupancy, or guaranteed by performance bonds of 150% the estimated cost of the mitigation.

Table 7: 2023 and 2034 Weekday PM Peak-Hour Level of Service Summary

Intersection	Control Type	2023 and 2024 Existing Conditions			2034 Baseline Conditions			2034 Future w/ Development Conditions		
		LOS	Delay	v/c	LOS	Delay	v/c	LOS	Delay	v/c
1. S Chelan Avenue at Orondo Street	Signal	B	14.6 sec	-	B	16.2 sec	-	B	16.6 sec	-
2. S Mission Street at Orondo Street	Signal	C	25.6 sec	-	C	27.1 sec	-	C	27.9 sec	-
3. S Chelan Avenue at Yakima Street	Signal	B	17.8 sec	-	B	20.3 sec	-	C	20.7 sec	-
4. S Mission Street at Yakima Street	Signal	C	25.5 sec	-	C	27.3 sec	-	C	28.4 sec	-
5. S Chelan Avenue at Kittitas Street	Minor-Leg Stop-Control	F	155.8 sec	-	F	204.8 sec	-	F	344.8 sec	-
2034 Improvements	Signal	B	19.4 sec	-	C	22.2 sec	-	C	23.6 sec	-
6. S Mission Street at Kittitas Street	Signal	B	16.4 sec	-	B	18.2 sec	-	B	19.5 sec	-
7. S Mission Street at Ferry Street	Signal	C	21.0 sec	-	C	24.0 sec	-	C	25.5 sec	-
8. S Mission Street at Stevens Street	Signal	C	23.6 sec	-	C	33.8 sec	-	E	57.2 sec	-
2034 Improvements	Optimized Timings	-	-	-	-	-	-	D	54.3 sec	-
9. S Mission Street at Crawford Avenue	Signal	B	21.5 sec	-	C	28.4 sec	-	D	46.5 sec	-
10. Methow Street at Crawford Avenue	Minor-Leg Stop-Control	D	25.3 sec Northbound	-	E	46.2 sec Northbound	-	F	88.0 sec Northbound	-
2034 Improvements	Roundabout	-	-	-	A	6.8 sec	0.68	A	7.1 sec	0.74
11. Okanogan Avenue at Crawford Avenue	Minor-Leg Stop-Control	E	39.4 sec Northbound	-	F	105.9 sec Southbound	-	F	187.9 sec Southbound	-
2034 Improvements	Roundabout	A	6.4 sec	0.45	A	6.7 sec	0.55	A	6.8 sec	0.60
12. S Miller Street at Crawford Avenue	Minor-Leg Stop-Control	C	23.3 sec Eastbound	-	D	32.2 sec Eastbound	-	E	46.9 sec Eastbound	-
2034 Improvements	Roundabout	-	-	-	-	-	-	A	7.2 sec	0.52
13. Squilchuck Road at Methow Street	Minor-Leg Stop-Control	B	10.4 sec Eastbound	-	B	11.0 sec Eastbound	-	C	18.8 sec Eastbound	-
14. Squilchuck Road at Pitcher Canyon Road	Minor-Leg Stop-Control	B	12.0 sec Eastbound	-	B	12.9 sec Eastbound	-	D	28.0 sec Eastbound	-
2034 Improvements	Channelization	-	-	-	B	11.6 sec Eastbound	-	C	17.1 sec Eastbound	-
15. Squilchuck Rd at Wenatchee Heights Road	Minor-Leg Stop-Control	B	10.7 sec Westbound	-	B	11.1 sec Westbound	-	C	15.6 sec Westbound	-

Clip from page 26, 2025 Kimley and Horn TIA

5.6.3.5a2 - S. Miller Street and Crawford Avenue mitigation plan is inconsistent with Chelan County Code.

The 2034 (after phase 3) baseline level of service projection for the S Miller Street and Crawford Avenue intersection is LOS D. The 2034 “future with development conditions” LOS projection is E. (See TIA table 7 above)

Since the developer is not obligated to construct phases 4 or 5, if construction stopped at this point, this intersection would be operating below LOS D as a direct result of the development. The TIA section 5.3 recommends a small roundabout (cost = \$1.4M) as mitigation and recommends that since the development traffic comprises only 12.1% of the total traffic at this intersection, the developer should pay only the proportionate share of the proposed mitigation (\$169,400).

Mitigation after phase 3 is required as a direct result of the development (and would not be required with the do nothing option). The County should not share capital improvement costs that would not otherwise be required. **All costs for intersection improvements (or costs much greater than 12.1%) should be borne by the development.**

Further, the report recommends that *“This proportionate share should be paid as Development occurs as part of the building permit process.”* This suggestion is inconsistent with the [MPR section 11.89.040](#) requirement that

“(8) All required public improvements including roads, utilities and public facilities that are part of the approved site plan and narrative shall be completed prior to issuance of a certificate of occupancy by the building official or installation guaranteed by the posting of performance bonds or other surety acceptable to the prosecuting attorney in an amount of one hundred fifty percent of the estimated cost of the outstanding improvements, except that all life/safety improvements must be installed and in operation prior to occupancy.”

And it is also inconsistent with the [MPR section 11.89.50](#) which requires that the costs for public service capacity increases must be borne by the development.

“(10) Existing public service purveyors may provide services as long as the costs related to service extensions and any capacity increases generated by the development are borne by the development...”

Mitigation of this intersection should be required prior to the issuance of any certificate of occupancy. The full cost should be paid by the developer, or guaranteed by performance bonds of 150% the estimated cost of the mitigation.

5.6.3.5a3 - Squilchuck Road at Pitcher Canyon mitigation plan is inconsistent with Chelan County Code.

The 2034 (after phase 3) baseline level of service projection for the Squilchuck Road and Pitcher Canyon intersection is LOS B. The 2034 “future with development conditions” level of service projection is LOS D. (See TIA table 7 above). This intersection is in the rural Squilchuck basin and the minimum level of service is C.

Mitigation is required. The TIA section 5.5 suggests an acceleration lane but argues to wait, that the number of cars affected is low, and maybe things will change and not require this mitigation. Since the developer is not obligated to construct phases 4 or 5, if construction stopped at this point, this intersection would be operating below LOS C as a direct result of the development and no mitigation would have been accomplished.

Mitigation is for projected impacts and this argument to wait and see what really happens is inconsistent with the [MPR section 11.89.040](#) requirement that

“(8) All required public improvements including roads, utilities and public facilities that are part of the approved site plan and narrative shall be completed prior to issuance of a certificate of occupancy by the building official or installation guaranteed by the posting of performance bonds or other surety acceptable to the prosecuting attorney in an amount of one hundred fifty percent of the estimated cost of the outstanding improvements, except that all life/safety improvements must be installed and in operation prior to occupancy.”

Mitigation of this intersection should be required prior to the issuance of any certificate of occupancy. The full cost should be paid by the developer, or guaranteed by performance bonds of 150% the estimated cost of the mitigation.

5.6.3.5a4 - Squilchuck Road and Mission Ridge Road capacity mitigation is inconsistent with Chelan County Code.

The 2034 (after phase 3) baseline level of service projection for Squilchuck and Mission Ridge Roads is A/B per the TIA table 11 v/c summary. The 2034 “future with development conditions” LOS projection is D.

Mitigation is required. The TIA section 6 suggests no mitigation. The DEIS suggests monitoring, stating that Squilchuck Road capacity will be monitored after each phase of the project. This “wait and see” approach allows the clogging of the Mission Ridge Road until it is operating at a level below the adopted County minimum. Since the developer is not obligated to construct future phases, if construction stopped at this point, the Mission Ridge Road would be operating below LOS C as a direct result of the development and no mitigation would have been accomplished.

Mitigation is for projected impacts and this argument to wait and see what really happens is inconsistent with the [MPR section 11.89.040](#) requirement that

“(8) All required public improvements including roads, utilities and public facilities that are part of the approved site plan and narrative shall be completed prior to issuance of a certificate of occupancy by the building official or installation guaranteed by the posting of performance bonds or other surety acceptable to the prosecuting attorney in an amount of one hundred fifty percent of the estimated cost of the outstanding improvements, except that all life/safety improvements must be installed and in operation prior to occupancy.”

Mitigation of the entire Squilchuck and Mission Ridge Road corridor should be required prior to the issuance of any certificate of occupancy. The full cost should be paid by the developer, or guaranteed by performance bonds of 150% the estimated cost of the mitigation.

Section 5.6.4 Significant and Unavoidable Adverse Impacts

The DEIS states:

“Through compliance with federal, state, and local laws and regulations and with implementation of the mitigation measures described in this section, there would be no significant and unavoidable adverse impacts related to transportation from construction or operation of the Proposed Project”.

If the project were constructed with only the mitigation recommended herein, a county highway will be constructed over fish-bearing streams which are currently diverted through existing shallow culverts, several intersections will become “unacceptable” according to County standards (and yet receive no mitigation by the developer), and the Squilchuck Road LOS will degrade from free-flowing rural to urban LOS standards with freeway-like traffic. These impacts are significant. The increased traffic on Squilchuck road is unavoidable. **The DEIS should be revised to require appropriate mitigation, and to recognize that the transformation of the Squilchuck valley from rural, to an urban access corridor with 10,000 daily car trips to and from the development, is a significant and unavoidable adverse impact. The DEIS should move Section 5.6 Transportation from Chapter 5 to Chapter 4.**

Section 5.7 - Utilities and Public Services

Section 5.7.1 Utilities/Public Services Overview - Water Service

The DEIS states that “*Potable water at Mission Ridge is currently sourced from on-site groundwater wells located at the Base Area.*” This assertion is true, but the action may not be legal. Mission Ridge has a permit for domestic water withdrawal from October 1 through May 1. **The DEIS should verify that legal permission to remove water in the summer months exists. If no domestic summer water right exists, then the DEIS should examine the water used by the applicant at its summer lodge restaurant.**

PUBLIC WATERS TO BE APPROPRIATED		
SOURCE Squillchuck Creek and Lake Creek (tributary to Squillchuck Creek); Unnamed Spring		
TRIBUTARY OF (IF SURFACE WATERS) Columbia River		
MAXIMUM CUBIC FEET PER SECOND 1.5	MAXIMUM GALLONS PER MINUTE	MAXIMUM ACRE-FEET PER YEAR 358
QUANTITY, TYPE OF USE, PERIOD OF USE 0.1 cfs, 10 acre-feet per year for community domestic supply from October 1 through May 1; 1.4 cfs, 348 acre-feet per year for commercial snowmaking.		

Snip from DOE Permit S4-31615P for domestic water from October 1 through May 1

Section 5.7.1 Utilities/Public Services Overview - Power Service

The DEIS states that “Chelan PUD has short-term projects that are intended to make approximately 2.0 mW available to support organic growth and potentially the first phase or two of the Applicant’s proposal.” It is not clear that the development will be paying for these short-term projects. [Chelan County Code section 11.89.050\(10\)](#) on Master Planned Resorts requires that:

Existing public service purveyors may provide services as long as the costs related to service extensions and any capacity increases generated by the development are borne by the development and such extensions do not promote sprawl or urban level of development adjacent to the MPR.

The DEIS should be revised to clarify that the cost of all public service extensions and capacity increases must be borne by the developer.

Section 5.7.1 Utilities/Public Services Overview - Telecommunication Service

The DEIS states that the PUD fiberoptic network will need to be extended from Forest Ridge to the project area. It is not clear that the development will be paying for the fiberoptic line extension. [Chelan County Code section 11.89.050\(10\)](#) on Master Planned Resorts requires that:

Existing public service purveyors may provide services as long as the costs related to service extensions and any capacity increases generated by the development are borne by the development...

The DEIS should be revised to clarify that the cost of the fiberoptic line extension must be borne by the developer.

Section 5.7.1 Utilities/Public Services Overview - Fire/basic life support (BLS)/police

The DEIS discusses a new fire station but it is not clear that the development will be paying for the fire station. [Chelan County Code section 11.89.050\(10\)](#) on Master Planned Resorts requires that:

(10) Community sewer, water, security and fire protection may be provided on-site and sized to meet only the needs of the development. Existing public service purveyors may provide services as long as the costs related to service extensions and any capacity increases generated by the development are borne by the development and such extensions do not promote sprawl or urban level of development adjacent to the MPR. An MPR that adjoins, or is in part within, an organized fire protection and/or hospital district shall seek annexation of the entire MPR site into said districts.

The DEIS should be revised to clarify that the cost of the new fire station must be borne by the developer.

Section 5.7.1 Utilities/Public Services Overview - Schools

The DEIS discusses the development’s student population, student pedestrian safety, and the capacity of the Wenatchee public schools to serve these new students. [Chelan County Code section 11.89.030\(3\)](#) allows residential development in a Master Planned Development only if such use will “support the on-site recreational

nature of the master planned resort.” School kids playing in the development roads and school buses traveling in and out of the development and down Squilchuck Road certainly do not support the on-site recreational nature of the master planned resort. School traffic would conflict with skier traffic, not support it. The inconsistency between MPR requirements and the proposed project are discussed in [Section 4.4.3.2 Impacts from Operation - Chelan County Zoning: Master Plan Resorts Overlay District](#). School kids do not support the on-site recreational nature of the MPR. **The DEIS should be revised to acknowledge that full-time permanent residents of the development that work in Wenatchee, and whose kids live at the development and go to school in Wenatchee, do not support the recreational nature of the resort and thus conflict with approval criteria in Chelan County Code for MPR status.**

Section 5.7.3.3 Direct Impacts from Operation

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

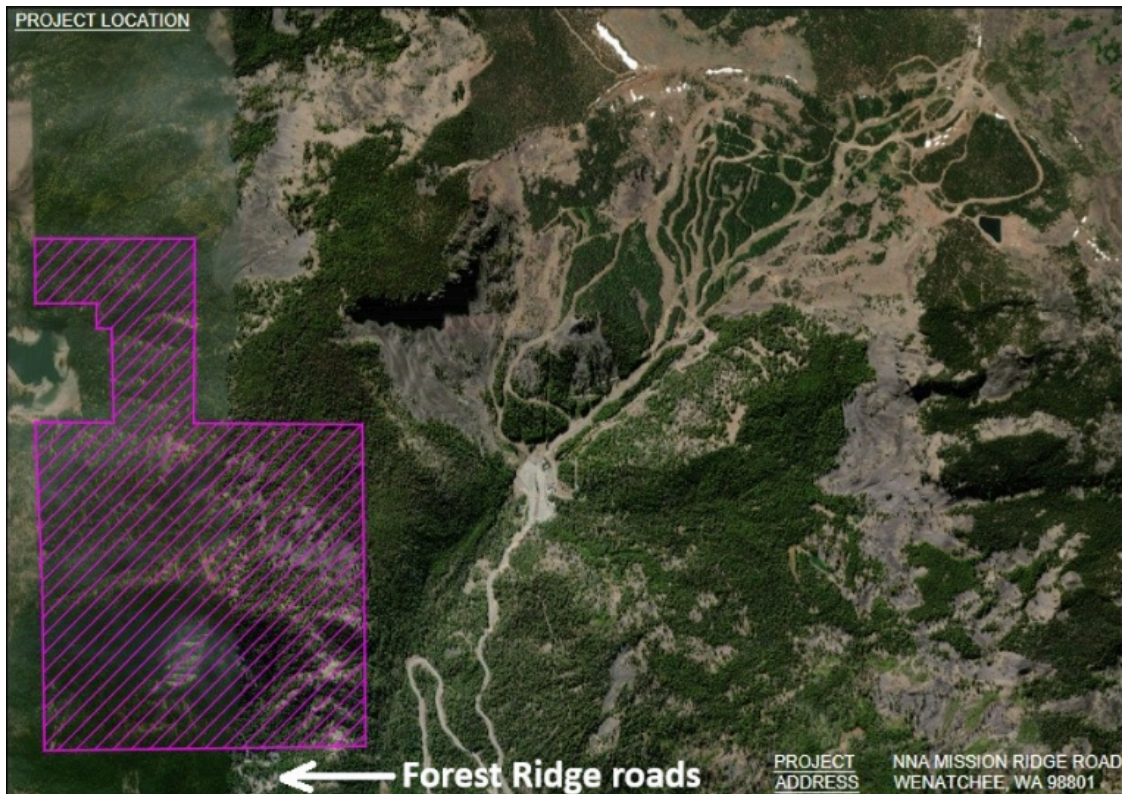
Section 5.8 - Noise

Section 5.8.1 Noise Overview

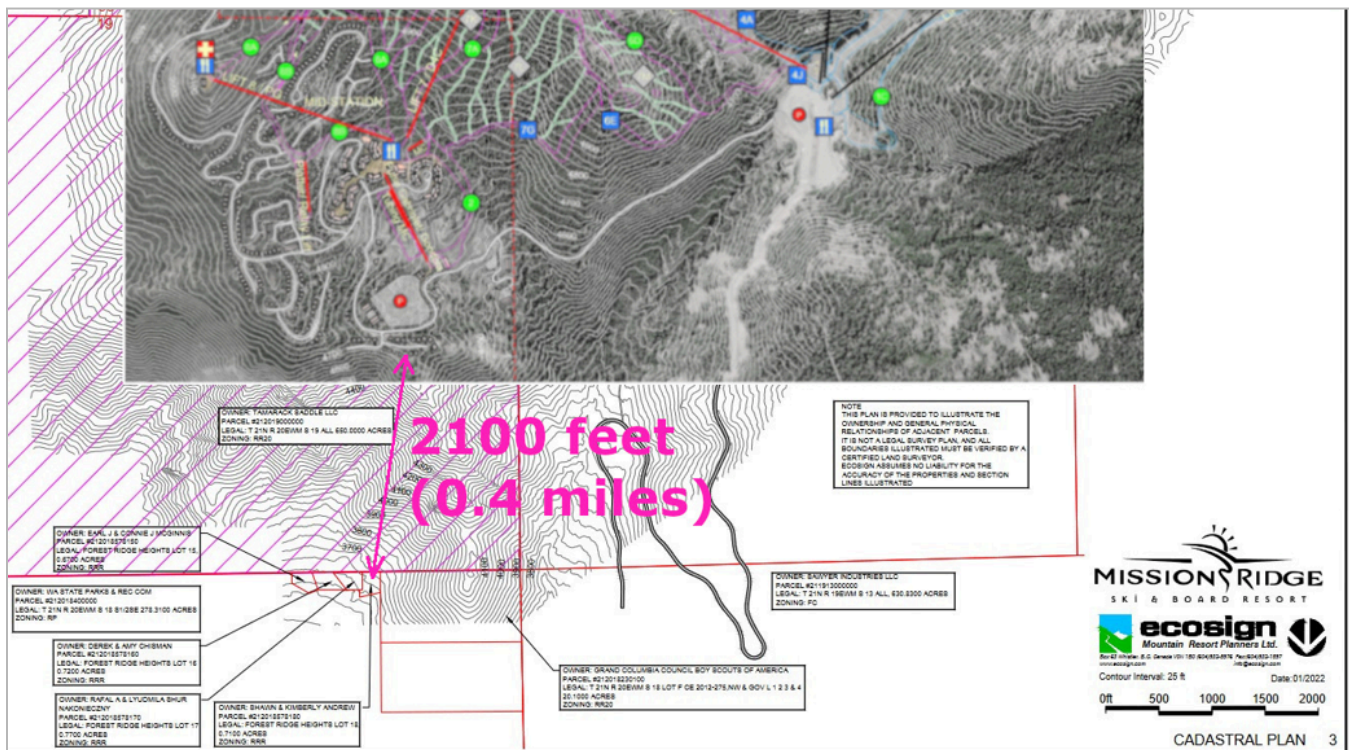
The DEIS states that:

“Residences in the Forest Ridge neighborhood are more than 3 miles north of the proposed resort construction,”

This is not correct. The nearest Forest Ridge homes are roughly 0.4 miles from the development homes. The relationship between the nearest Forrest Ridge homes to the nearest proposed development homes is shown on the graphics below which are reproduced and edited from the [revised site plans](#) submitted to Chelan County in 2022. 15,000 feet is used in sound level discussion throughout the chapter. This number is erroneous and relates to the incorrect 3 mile assertion. **The DEIS should be revised to correct the proximity of Forest Ridge to the project from “more than 3 miles” to roughly 0.4 miles. The sound discussions should be updated to reflect the correct 2100 feet as opposed to the incorrect 15,000 feet.**



Project location map from revised site plans showing proximity of Forest Ridge to the project



Cadastral Plan 3 with overlay of "Mountain Master Plan - Orthophoto 5a" from project revised site plans.

Section 5.8.3 Findings for the Proposed Project

Section 5.8.3.1 Direct Impacts from Construction

The DEIS states:

"In the short term, the Proposed Project would result in increased temporary noise associated with construction at the Project Area."

This short term is expected to last 20 years. It is deceiving to refer to a 20 year disturbance as short term.

"Noise levels from construction would be louder than the typical environment; however, the effects would be limited in duration and would not occur close to any sensitive receptors."

Excusing "louder than the typical environment" because the effects are limited in duration is insincere because the limited duration is 20 years. Limited in duration implies a short amount of time over which the disturbance can be tolerated. 20 years exceeds the life expectancy of many of the residents of the Squilchuck community.

"By the time the noise from construction at the resort reached the location of the sensitive receptors greater than 15,000 feet away in the Forest Ridge neighborhood, it would be in the 30-40 decibel range, which is approximately the sound of a soft whisper."

This analysis is incorrect because the 15,000 foot distance is off by a factor of 7.

"Noise levels from construction of the Proposed Project would not exceed prescribed levels under WAC 173-60 (Maximum Environmental Noise Levels)"

This may not be true. Using a 5 dBA reduction for each doubling in distance, the stated 89 dBA at 50 feet should translate to 64 dBA at 2000 feet at the nearest permanent sensitive receptor. 64 dBA exceeds the maximum permissible environmental noise level of 55, 57, or 60 for Class A receiving property per [WAC 173-60-040](#).

"Birds and mammals may be temporarily disturbed or displaced due to construction noise."

This is a significant impact. A 20 year disturbance will likely permanently alter the nesting patterns of golden eagles and goshawks. The noise will interrupt the hunting patterns of mountain lions, coyotes, and bobcats. It will degrade or destroy the migration path and calving grounds of mule deer and the Colockum elk herd. [Issue 71 of the Rocky Mountain Research Station Science Bulletin](#) on "How Human-Generated Noise Disrupts Wildlife" found that Elk were the most sensitive to recreation noise and that Recreation noise led to reduced wildlife presence at affected sites for up to a week after exposure.

"In summary, ...there would not be probable significant adverse construction-related impacts on sensitive receptors from the Proposed Project."

This conclusion is inappropriate. The sound impacts at the nearest sensitive receptors are miscalculated based on a gross proximity error. An impact that is expected to last 20 years cannot be dismissed by labeling it "short term, limited in duration, or temporary". The noise may exceed the WAC maximum permissible environmental noise levels. Even if noise maximums are not exceeded, just because something is legal, doesn't mean it has no negative impact. The effect on wildlife deserves an actual study, not just a single sentence declaring the impact negligible because of its temporary nature. **The DEIS should be revised to correct the sensitive receptors proximity error, conduct actual sound level calculations to determine actual effects, and eliminate language that downplays construction related noise effects simply because they are "temporary". A 20 year temporary duration will feel permanent to the affected birds, animals, and residents of the upper Squilchuck valley.**

Section 5.8.3.3 Direct Impacts from Operation

The premise of the operational argument in the DEIS is that Forest Ridge residences are more than 3 miles away.

"As described in Section 5.8.1, the nearest existing sensitive receptors to the Project Area are residences that are more than 3 miles away, where the increased noise is likely to be imperceptible."

This premise is off by a factor of 7. The nearest homes are only 0.4 miles away. An analysis of noise levels should be performed using the correct distances and the conclusions herein should be updated.

The DEIS acknowledges increased noise levels due to traffic.

"Noise levels from vehicles driving to and from the Project Area would also increase due to the increase in visitors. This includes an increase in noise along the existing Mission Ridge/Squilchuck Road... The

development has been analyzed to generate 9,811 new weekday average daily trips (ADTs) and 10,807 Saturday ADTs (Kimley-Horn 2023).”

But downplays the effects by arbitrarily declaring the extra traffic noise to be moderate, and by alluding to a gradual increase due to the 20 year construction period.

“Noise associated with increased traffic is expected to be moderate for sensitive receptors located along Squilchuck Road as Saturday volumes in February are expected to increase by 154% and 398% for northbound and southbound respectively. Traffic volumes will increase slowly as the development is implemented over a 20-year timeframe rather than all at once.”

The current soundscape for residents of the Squilchuck Valley who live along the Squilchuck or Mission Ridge road is a quiet rural setting with occasional traffic noise. Along Squilchuck creek, residents can hear frogs croaking, birds singing, wind in the trees, and rain on the roof. The proposed soundscape during peak hour traffic is a constant freeway-like din, with a car in each direction every few seconds which will drown out natural sounds, and possibly drive away birds and mammals. The statement about slow increase to traffic volumes appears to allude to a mitigating effect of slow exposure to the negative impact. This is insulting, as it implies tricking the rural community into accepting the urban noisescape by gradual introduction of cacophony. In addition, it is misleading. The [traffic impact analysis](#) does not break down traffic increase by phase, but it does calculate anticipated new traffic after phase 3 is complete.

Table 5: Anticipated New Trips: Phases 1-3

Time Period	Total Trips	Phases 1-3 Percentage	New Phases 1-3 Trips
Average Daily Trips	9,655	82%	7,917
PM Peak-Hour	799	82%	655
Saturday Average Daily Trips	10,766	82%	8,828
Saturday PM Peak-Hour	940	82%	770

Clip from 2024 TIA showing new traffic after phase 3

Table 1: January Volume Report Summary

Location	Thursday, January 26, 2023			Friday, January 27, 2023			Saturday, January 28, 2023			Sunday, January 29, 2023		
	Daily Volume	PM Peak- Hour	Peak Time	Daily Volume	PM Peak- Hour	Peak Time	Daily Volume	PM Peak- Hour	Peak Time	Daily Volume	PM Peak- Hour	Peak Time
Mission Street, s/o Stevens Street	16,560	1,469	4:15 5:15	17,582	1,647	3:45 4:45	14,336	1,224	3:45 4:45	12,450	1,083	3:45 4:45
Squilchuck Road, s/o Methow Street	3,543	352	4:00 5:00	4,179	445	4:00 5:00	4,630	508	3:45 4:45	3,543	367	3:45 4:45

Clip from TIA showing current daily volumes

By ratio of total estimated trips and phase completion of each component (single family, multi-family, lifts installed, commercial space installed, employee beds, hotel rooms), the trips generated by each phase are estimated below.

Trip Generation by phase - Weekdays					
phase 1	phase 2	phase 3	phase 4	phase 5	total
3740.409					3740.409
3740.409	2538.736				6279.145
3740.409	2538.736	1588.868			7868.013
3740.409	2538.736	1588.868	1497.692		9365.706
3740.409	2538.736	1588.868	1497.692	289.2943	9655
Trip Generation by phase - Saturdays					
phase 1	phase 2	phase 3	phase 4	phase 5	total
5207.895					5207.895
5207.895	2737.467				7945.361
5207.895	2737.467	1317.246			9262.607
5207.895	2737.467	1317.246	1214.332		10476.94
5207.895	2737.467	1317.246	1214.332	289.0604	10766

Estimation of trip generation by phases

Comparing current weekday daily traffic (4179 trips) to the condition after phase 1 is complete (4179 + 3740 = 7919 daily trips) shows an 89% increase in traffic after phase 1. The same comparison for Saturdays (4630 current daily trips compared with 9838 post phase 1 trips) shows traffic increases by a factor of 2.12 after just phase one. Double the traffic! This is not a slow increase to traffic volumes. This is a doubling of traffic in just the first phase of the project.

In addition to the noise impacts to sensitive receptors (inhabited homes), wildlife is also affected by noise. [A 2015 PNAS \(proceedings of the National Academy of Science of the USA\) research article "A phantom road experiment reveals traffic noise is an invisible source of habitat degradation"](#) studied the impact on wildlife of road noise in the absence of an actual road and found that noise displaced one third of migratory song birds, and that some birds that remained despite the noise experienced declining body condition and stopover efficiency.

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

Section 5.9 - Cultural Resources

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

Section 5.10 - Recreation

Section 5.10.3.1 Impacts from Construction - Access to existing recreation areas

The DEIS acknowledges that the project will impact trailhead access to the popular Lake Clara trail:

“The increase in visitors to the Proposed Project Area year-round may impact the parking availability for visitors to Clara and Marion Lakes, which utilize the Mission Ridge base area parking lot as its trailhead.”

And suggests that parking a mile away at the remote development is an acceptable alternative.

“The increased visitor demand will be accommodated with additional parking capacity in the expanded area.”

The trail to Lake Clara is only 1.5 miles in length. To suggest moving the trailhead parking a mile from the trailhead, for a 1.5 mile hike, is not a realistic alternative. The project site plans do not show the extension of the County Road through the Mission Ridge parking lot and do not indicate how trailhead parking will be configured.

The DEIS should be revised to include a more comprehensive picture of the final proposed trailhead condition and discussion and mitigation for interruption of trailhead parking.

Section 5.10.3.1 Impacts from Construction - Quality of recreation amenities

The DEIS recognizes the popularity of Squilchuck State Park, which has increased visitation by 300% since 2014. Tremendous work has been completed by Evergreen Mountain Bike Alliance. The park is now a popular mountain bike destination with youth education camps and several mountain bike races each year. The park grooms fat-bike trails in the winter, hosts camping in the reservation-only campground, and enjoys about 60,000 visitors per year. The park is used by horse riders, trail runners, backcountry skiers, has a sledding hill and a lodge that can be reserved for private events.

“Open year-round, Squilchuck hosts group campgrounds, trails, bird watching scenic views, and an ungroomed ski route (Washington State Recreation and Conservation Plan n.d.). The summer season brings opportunities for hiking and biking while winter provides avenues for cross country skiing and snowshoeing. Between 2018 and 2022, annual day-use summer visitation at Squilchuck State Park was about 32,000. Winter day-use visitation averaged 29,000, for an overall five-year average of more than 60,000 visitors—an increase of about 300% since 2014 (WSP n.d.). Overnight visitation averaged about 1,500 people each year between 2014 and 2022.”

The DEIS further acknowledges that construction activity will affect the quality of visitor experience, persist over a long time, affect wildlife, and degrade people's experience in nature:

“With construction occurring in the expansion area as well as the planned road and utility improvements along the Squilchuck Road corridor, construction noise may be heard in the Squilchuck State Park and nearby natural areas. Given the amount of construction planned, this noise may be persistent over long periods of time. This noise may affect the quality of visitor experiences within these areas.”

Construction activity and resulting noise may have a more distinct impact on nearby wildlife activity, which could affect people's experience of nature, wildlife watching, or hunting activities. The impact to wildlife views would most impact Squilchuck State Park where bird watching is officially listed as a recreation activity, as well as Clockum Wildlife Area. The quality of hunting in Clockum may also be impacted, as wildlife activity may be disturbed due to nearby construction noise.”

The DEIS explains that because of this decreased quality of recreation experience, users will choose to go elsewhere. The DEIS says that

“Because the changes in quality would be transitory and most visitors appear willing to substitute to other locations, recreation impacts would be minor.” AND: “In summary...there would be no significant adverse construction-related impacts on existing recreation areas, the quality of recreation amenities, or the availability of recreation amenities from the Proposed Project”.

This conclusion is arbitrary and wrong. The DEIS anticipates that the noise and disturbance will be significant enough to displace recreation away from the project. Given that the “transitory” nature of the project is actually a 20 year duration, the idea that people can just go elsewhere to recreate is insulting. This is not a minor impact. This is significant enough that the DEIS envisions recreationalists abandoning the area. In order to offer solutions towards mitigation, a proper study should be done to understand the number of recreationalist and user groups that will be impacted. Dispersed recreation has a low impact on the land, and offers economic and social

benefits to the community. Understanding which user groups can adapt and change their behaviors and which will be significantly impacted will be important to mitigate the impacts of 20-years of intensive development in the project area. **The DEIS should be revised to provide an honest assessment of the diminished recreation quality due to construction activity.**

Section 5.10.3.2 Impacts from Operation - Availability of recreation amenities

The DEIS acknowledges that backcountry skiers will have to travel further or ski elsewhere in the region because of the changes to access caused by the development.

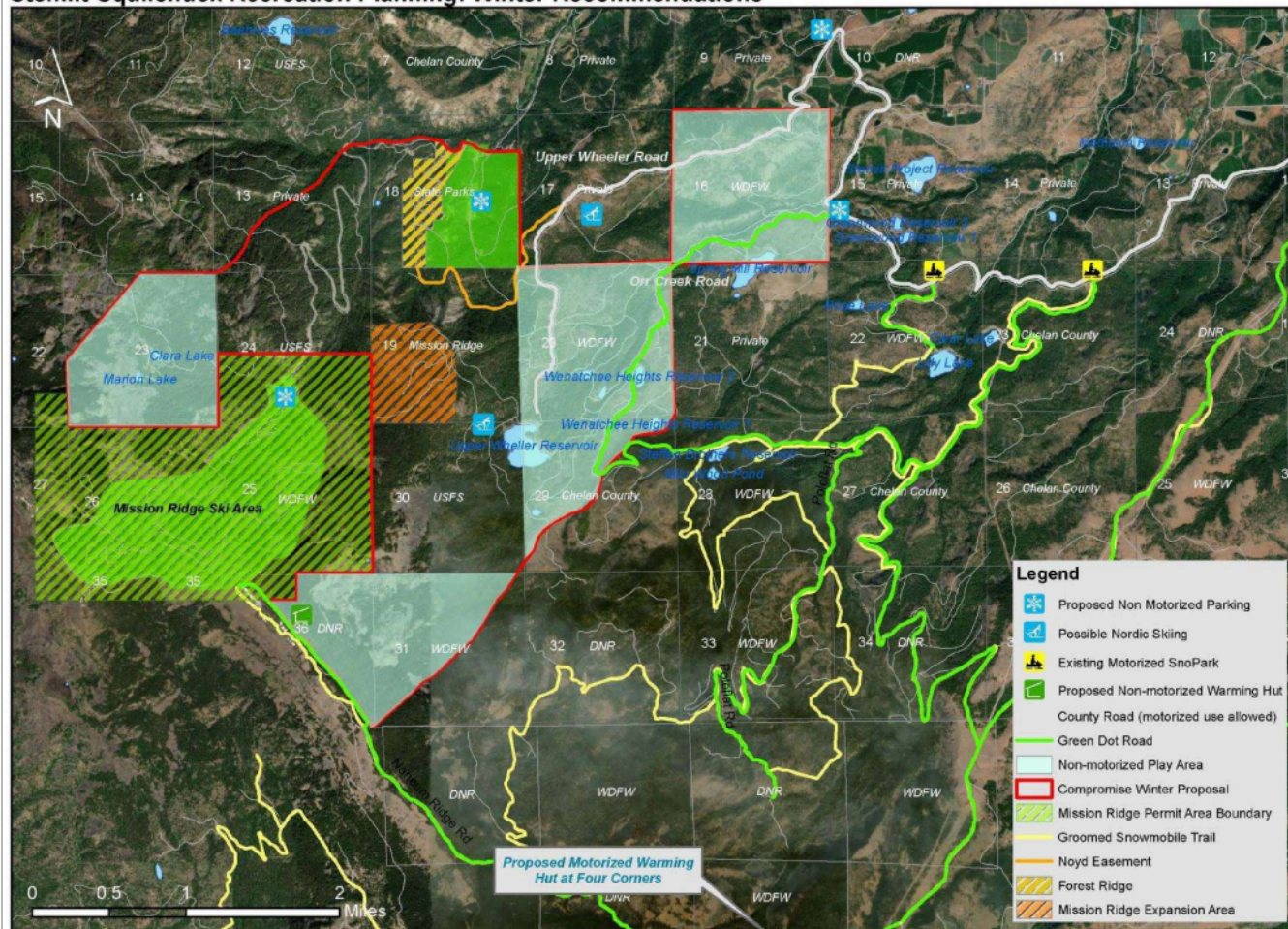
“Backcountry skiing would still be available adjacent to and nearby the project area, but skiers may have to travel further to reach these areas.”

The DEIS then arbitrarily declares this impact minor due to the unrelated recreation created by the development.

“This impact would be minor, however, as the increase of available recreation amenities from to the Proposed Project expansion would increase and opportunities for backcountry skiing would continue to be available in the region.”

This conclusion is arbitrary and wrong. Mission Ridge has a history of limiting or denying travel, hunting, camping, dogs, snowmobile and other motorized access, drone use, and parking on public lands within their special use permit area. This behavior can be expected to continue. Extending the boundaries of the ski area’s special use permit will effectively eliminate access to public lands in the expanded Special Use Permit area. This will also cut off access to recreationalists who currently use that area as a travel path from the Mission Ridge parking lot to the newly established winter non-motorized area in the upper Stemilt Basin.

Stemilt-Squilchuck Recreation Planning: Winter Recommendations



Notes: See Recommendations in planning document for complete description of winter recreation concepts. Mission Ridge Permit Area Boundary is a non-motorized use area under permit conditions. Motorized restrictions on or crossing private and federal land is pursuant to travel management policies of those landowners/agencies. Chelan County, GIS 2018.

The [uphill route](#) to Stemilt that is described on the Mission Ridge website will become unusable because the path from the parking lot will now be directly beneath a new chairlift and within the expanded Special Use Permit area. In addition to having to travel further to reach backcountry ski terrain, the recreational quality of the Stemilt and Clara basins on both sides of the ski area will be degraded by crowding. The DEIS concludes:

“...the project would benefit recreation users by increasing the overall supply of recreation amenities in the area due to the introduction of new recreation facilities during winter and expanding park operations into summer seasons without impacting the supply of recreation amenities in surrounding areas.” AND: “...there would not have significant adverse operation-related impacts on existing recreation areas, the quality of recreation amenities, or the availability of recreation amenities recreation from the Proposed Project.”

This conclusion is wrong. A small user group of lift access skiers and wealthy development residents will benefit from the recreation environment of the project. However, recreation amenities in surrounding areas will be degraded for all other user groups. Catering to resort skiers at the expense of other user groups doesn't make sense. Backcountry skiing has grown eightfold from 1995 to 2017, making it the fastest-growing segment of snow sports. This trend continued into the pandemic era, with increased participation driven by resort closures and restrictions. Over the last 20 years, more than 45 ski resorts have closed in the U.S., and the number of operating resorts has decreased by 15.4% since 1991-92, with a low of 462 resorts in the 2020-21 season. **The DEIS should be revised to discuss the recreational user groups that will be negatively affected by the crowding and loss of access to areas currently being enjoyed by diverse recreationalists.**

Section 5.10.3.2 Impacts from Operation - Access to existing recreation areas

This section of the DEIS is poorly written, misleading and persuasive. Each portion of the section is reprinted here with comments to follow.

*“The proposed expansion of the resort is expected to increase the number of visitors to the area over time, which **could increase traffic**...”*

“Could increase traffic” is misleading. The TIA attached to the DEIS as [appendix I](#) estimates roughly 10,000 new trips per day to and from the development. Could implies might. The TIA indicates that it WILL.

“...could increase traffic in the area and potentially reduce availability of parking at nearby trailheads. However, newly constructed roadways to the park and improved access to Squilchuck State Park because of intersection improvements should address any potential local traffic impacts to existing recreation facilities.”

This is nonsense. Additional traffic potentially causing extra demand on trailhead parking is not mitigated by intersection improvements.

“Impacts to parking availability at trailheads would likely be minimal compared to current use patterns during most of the recreation season.”

This is arbitrary and wrong. 4000 people living within a mile of the Lake Clara trailhead will increase use of the Lake Clara trail. A study of the probable impact is warranted. Declaring without argument or evidence that impacts would be minimal is persuasive writing. The summary of impacts states:

“...there would not have significant adverse operation-related impacts on existing recreation areas, the quality of recreation amenities, or the availability of recreation amenities recreation from the Proposed Project.”

This conclusion is incomplete and wrong. Squilchuck State Park impacts have not been discussed or analyzed in this document nor have other popular recreation sites including Beehive Reservoir, Mission Peak, Beehive-Liberty Road which is part of the The Washington Backcountry Discovery Route, Stemilt Basin, or Naneum Ridge (which is also accessed by the Ellensburg community).

Additionally, the impacts of climate change and recreation are not addressed in this section. As climate changes, human recreation patterns change. The impacts of this need to be factored into the EIS as they will help predict near-term and long-term uses in the upper Stemilt-Squilchuck and Mission Ridge environs. It's expected that

we'll continue to see a shift in hiking and camping patterns that favor higher elevations to seek cooler temperatures. Mission Ridge with a max elevation of nearly 7,000 feet offers a temperature respite to the surrounding communities. It's likely that these close-to-town, upper elevation zones will become more important in the future. A 2015 research article "[Protected Area Tourism in a Changing Climate: Will Visitation at US National Parks Warm Up or Overheat?](#)" found that recreational visits to U.S. national parks have shifted toward cooler months (spring and fall) and higher-elevation parks due to rising summer temperatures.

"Many high-latitude and high-elevation parks show increases in potential visitation across most of the year and especially during the shoulder seasons."

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

Section 5.10.3.2 Impacts from Operation - Quality of recreation amenities

This section of the DEIS is poorly written, misleading and persuasive. Each portion of the section is reprinted here with comments to follow.

"The introduction of new lifts to the Mission Ridge Ski Area under the proposed expansion would benefit recreation participants."

The only recreationalists who benefit from ski lift operation are ski area lift skiers. Resort skiing is on the decline, while other forms of recreation (all of which are quieter, less disruptive and less infrastructure intensive) are increasing.

"Backcountry skiing, splitboarding, and other forms of human-powered snowsports are activities which are seeing substantial growth. USDA and Forest Service recreation researchers predict that participation in backcountry skiing (including splitboarding) will increase between 55% and 106% by 2060. In contrast, Snowsports Industries America (the winter outdoor industry's non-profit trade association) data shows that participation in resort skiing has declined steadily over the past decade. With more people than ever exploring the backcountry, it's critically important that we preserve close-to-home, easy-to-access undeveloped terrain."

[Hilary Eisen](#), (former) Policy Director - Winter Wildlands Alliance

Focusing on resort skiing also is blind to the trajectory of climate change and the impact it will have on ski areas. While reliable resort skiing could go away with warm temperatures, erratic weather, and rain on snow events, all the other forms of recreation could still persist to some degree. To build a climate resilient future, we need to have the option of adaptability and putting all our eggs in the resort skiing basket seems unwise. This section of the DEIS is myopic to the paying guests of the resort and discounts the snowshoers, backcountry skiers, campers, bird watchers, hikers, hunters, anglers, horsemen, and every other dispersed recreationalist who benefits from access to the public land that this resort interrupts.

"Increased access to new and existing ski routes may decrease the time it takes visitors to return to higher elevations and expand their choices of recreation, therefore increasing visitor enjoyment."

This is misleading and wrong. There is no increased access to existing ski routes as a result of the new chairlifts at the development. There is no possible way the installation of development lifts will decrease the time it takes to get to higher elevations. Chairs 2, 3, and 4, which access higher elevations at the ski resort, are remote from the development and its chairlifts' high points. There are no expanded choices of recreation associated with the new chairlifts. The conclusion, "therefore increasing visitor enjoyment" is nonsensical and does not follow the arguments.

"Additionally, an increase in capacity would reduce congestion within the ski area, leading to a more positive experience for existing and future recreation participants."

This is untrue. The increase in capacity occurs in the parking lots which are proposed to have parking for 5500 people. Chairs 1, 2, 3, and 4, which are the only chairs that elevate skiers in the actual Mission Ridge basin and ski area, will have no additional uphill capacity as no improvements are scheduled. The proposed new chairs

service only the low elevation runs above the development and do not provide meaningful ski area expansion. [The 2020 Mission Ridge Expansion Project: Draft Environmental Analysis](#) indicates that the current comfortable carrying capacity of the ski area is 2784 guests and that the projected future comfortable carrying capacity after the new parking and lifts are installed, will be 4664 guests. The future condition with the development includes roughly 2000 more skiers than now, with zero uphill capacity improvements in the ski area. This means that congestion on the runs will increase, lift lines will be longer, and this does not lead *“to a more positive experience for existing and future recreation participants.”* The DEIS states:

“...increased capacity and improved infrastructure should overall improve participants recreation experience.”

This is misleading and untrue. The only capacity increase in the ski area is the parking and there is no plan to improve infrastructure at the ski area. All new capacity and infrastructure occurs on the short, low-elevation ski runs above the development, which is marketed by Mission Ridge as new beginner terrain. More crowding on the same lifts in the ski area does not *“overall improve participants recreation experience.”* The Summary of impacts states:

“From an operations impact perspective, the project would benefit recreation users by increasing the overall supply of recreation amenities in the area due to the introduction of new recreation facilities during winter and expanding park operations into summer seasons without impacting the supply of recreation amenities in surrounding areas.”

This conclusion does not follow the arguments. The project may benefit a small subset of recreation users, that subset being beginner lift access downhill skiers. However, the project disturbs or displaces all other recreation groups that currently enjoy the quiet, rural, easily accessible public lands of the upper Squilchuck and Stemilt basins as well as the local lift skiers who currently enjoy short lift lines and relatively uncrowded ski runs. **The DEIS should be revised. The Quality of recreation amenities section of chapter 10.3.2 should be completely reworked. The section should identify the recreation amenities impacted by the development, assess the impacts to those areas, and provide an honest report of the negative impacts that are probable at those sites.**

Section 5.10.3.3 Indirect Impacts from Operation

The DEIS states that

“No indirect impacts from operation of the Proposed Project on availability of recreation amenities, access to existing recreation areas, or quality of recreation amenities were identified.”

The traffic alone impacts several recreational user groups and is unavoidable. The Mission Ridge road is popular with road bikers, Forest Ridge residents who walk their dogs on the road, trail runners who connect the Devils Spur trailhead with the Lake Clara trailhead and then use the road to return to their car, uphill roller ski athletes use the road for summer training. All of these user groups will be displaced by 10,000 car trips per day which will make the Mission Ridge road unpleasant and unsafe for recreation. In addition, the noise from the traffic will impact recreationalists on the Lake Clara trail, the Devils Spur trail, and mountain bike riders on the trail system at Squilchuck State Park.



[Plain Valley Ski Team](#) athletes training on the Mission Ridge Road near the Devils Spur turnout. June 27, 2025



[Tour de Bloom](#) Hill Climb on the Mission Ridge Road



Trail runner completing a loop along the Mission Ridge Road



Roller skier on the Squilchuck Road. August 14, 2025

The DEIS should be revised. Contrary to the conclusion of this chapter, operation of the project creates indirect impacts on recreation. The DEIS needs to identify and discuss the indirect impacts on recreation from operation of the Proposed Project. These impacts are unavoidable. If these impacts are also found to be significant, then the DEIS should move Section 5.10 - Recreation from Chapter 5 to Chapter 4.

Section 5.10.4 Significant and Unavoidable Adverse Impacts

The DEIS claims there are no impacts on recreation from operation, and only minor impacts during construction which don't count because they are temporary and localized:

"While the project may produce minor adverse impacts due to access to and quality of recreation opportunities during construction, they are not significant given their temporary and localized nature."

Several direct and indirect adverse impacts from operation have been identified including crowding at the ski area, displacement or degraded experience of dispersed recreationalists including backcountry skiers, snowshoers, campers, bird watchers, hikers, trail runners, hunters, anglers, and horsemen. Impacts include the loss of Mission Ridge road availability for trail runners, road bikers, dog walkers, and roller ski athletes. In addition, it is not accurate to downplay impacts from construction simply because they are temporary and localized. Temporary means 20 years for this project, and localized refers to the entire Squilchuck and Mission Ridge Road corridor, Squilchuck State Park, the Lake Clara basin, and the upper Stemilt basin. The Wenatchee valley enjoys unique access to the Wenatchee Mountains via a paved road all the way to the base of the mountains. Most communities do not have this amazing and easy access to alpine environments. This project affects access to the Wenatchee Mountains for every visitor using the Squilchuck and Mission Ridge roads. **The DEIS should be revised to acknowledge the negative impacts from construction and operation. Many of these impacts are unavoidable. If they are also found to be significant, then the DEIS should move Section 5.10 - Recreation from Chapter 5 to Chapter 4.**

Our organizations appreciate the opportunity to provide comments on the draft Environmental Impact Statement for this unprecedented development project. Many of our members will be directly impacted by changes to water quantity, water quality, noise, traffic, crowded ski slopes, loss of dispersed recreational access, wildlife disruption and light pollution which are all predicted in the DEIS. We urge Chelan County to enforce established codes and not bend the rules for the benefit of a developer. Since the development appears not possible without breaking County Codes, We urge you to select the No-Action Alternative, which is the only alternative besides the full development build-out that is presented in the DEIS.

Thank you for considering our comments.



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