



Kettle Range

CONSERVATION GROUP

Protecting the forests and wildlife of the Columbia Highlands since 1976

October 21, 2025

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

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

Dear Mr. Kaputa,

The following comments are submitted on behalf of the Board of Directors and membership of the Kettle Range Conservation Group (KRCG / Kettle Rangers) regarding the Mission Ridge DEIS. Founded in 1976 in Republic, Washington, Kettle Rangers have a long history of forest, recreation, wildlife advocacy and conservation of natural resources. We dedicated the past 20 years of our lives to promote collaborative problem solving and toward creation of a revised Colville National Forest Plan that represented the interests of all Americans.

Kettle Rangers are outdoor enthusiasts that include among our many interests, skiing, hiking, backpacking, and mountaineering. Many KRCG members use and enjoy Mission Ridge Ski Area and the surrounding Wenatchee National Forests.

KRCG appreciates this opportunity to provide comments regarding the DEIS for the proposed development adjacent to Mission Ridge area. Incorporated by reference to comments submitted by Crag Law Center.

DEIS Analysis is Inadequate

The DEIS is full of omissions of environmental and social impacts, inadequate mitigation of potential impacts, and incorrect assertions. Additionally, the proposed development violates Chelan County Codes. Because of this, I oppose the development and urge you to support the No Action Alternative.

This project does not qualify as a “private proposal” under WAC 197-11-440(5)(d) because much of the development is on state and federal land. The Washington Department of Fish and Wildlife’s (WDFW) decision whether to allow this development on its land or not is

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entirely discretionary. The proposed use of WDFW land requires the DEIS to consider whether there are other alternatives on other sites that could meet the objectives of this project.

Regardless, the DEIS needs to consider on-site alternatives. 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 less environmental cost than the proposed project on the proposed site. 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 1,000 units it proposes to build nor why an alternative with less units would not be a reasonable alternative that “approximates” the proposal’s objectives.

Traffic, Pollution, Property and Social Physiological Stress

First among inadequate analysis are the impacts of increased motor vehicle traffic to existing residents who live on and near the Squilchuck and Mission Ridge Road, including air and noise pollution, increased risk of accidents, property damage, theft, stress and bodily harm. The project predicts 10,000 vehicle trips per day on the Mission Ridge Road, which is roughly double the traffic on both Stevens Pass and Blewitt Pass. The DEIS predicts that the development will snarl traffic to a condition below minimum Chelan County standards, yet the DEIS does not include mitigation or improvements to the Mission Ridge Road. The Chelan County Comprehensive Plan Goal 1.9 is “...*deny approval of any development proposal that would cause a roadway segment to fall below the adopted minimum level of service...*”. Our community should not be burdened by snarled traffic that financially benefits a developer but hurts the rest of us.

This massive increase in motor vehicle use will degrade the experience that skiers and other recreationist currently enjoy.

Project Degrades Fish & Wildlife Habitat

Mule deer, Colockum Elk, golden eagles, goshawks, pika, marmots, bobcats, mountain lions, coyotes, and black bears regularly use the section's wildlife corridors. Section 25's whitebark pine forests, springs and wetlands, talus slopes, and undisturbed shrub-steppe openings are vital wildlife habitats. This section grows more important as development threatens to destroy similar habitats on adjacent parcels.

What are the cumulative impacts of this project combined with adjacent forestry projects and Labor Mountain Wildfire on fish, wildlife and seclusion-dependent species including TES species? How does this project impact wildlife movement? In total, how are you determining your linked actions, ski area, massive overnight lodging construction, vehicle traffic, etc. across this landscape are not going to further jeopardize wildlife habitat suitability?

What monitoring data supports significantly changing wildlife habitat suitability for seclusion dependent and migrating sensitive species moving between lowland and highland habitat? Will the project sustain/protect habitat for Canada lynx, grizzly bear, wolverine, marten, fisher goshawk, whiteheaded woodpeckers, northern spotted owl, great grey owls, bats and other wildlife? A spatially explicit landscape evaluation that examines proposed project development needs to be conducted.

As landscapes are further divided, wildlife habitat suitability decreases. When a large contiguous/connected suitable habitat remains, wildlife are healthier, able to better avoid predation and have greater access to shelter and food. As fragmentation reaches a critical level and species begin to die out. Habitat fragmentation is a principal threat to most wildlife species in the temperate zone. (Wilcove 1986) Silvicultural treatments that fragment and degrade snowshoe hare and red squirrel habitat, impact lynx, elk, goshawk, whiteheaded woodpecker and wolverine habitat suitability.

Alternative Escape Route

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

WDFW Land Exchange

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

table, the likelihood that it is illegal for DFW to swap the land, and DFW indicating that expanded year-round activity is not an allowable use of Section 25, Section 25 should be excluded from any expanded ski resort or development activity.

Master Planned Resort Overlay

Without a Master Planned Resort Overlay (MPR), the proposed level of development would violate the Urban Growth Act and could not be allowed. The developer is depending on this land use strategy which allows dense urban-style development outside the urban growth boundary.

Despite depending on this planning tool, the development violates the requirements of MPRs including: Impacts are not fully mitigated, costs of public services are not fully borne by the developer, the development is not primarily a destination resort, is not self-contained, does not consist of short-term visitor accommodations, does not consider affordable employee housing, and does not preserve the rural character or natural resource it uses. Since the proposal does not meet the requirements for an MPR, the development should not benefit from the housing density allowed by an MPR.

These are just a few of the unclear, misleading, untrue, incomplete, arbitrary, and persuasive statements in the DEIS. The development breaks County Codes, I urge you to select the No-Action Alternative, which is the only alternative besides the full development build-out that is presented in the DEIS.

We appreciate this opportunity to submit comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Timothy Coleman', with a long horizontal flourish extending to the right.

Timothy Coleman
Executive Director

References Cited

Washington Department of Fish & Wildlife, *Canada lynx*. (n.d.).

<https://wdfw.wa.gov/species-habitats/species/lynx-canadensis#conservation>

Wilcove Ds, Mclellan Ch, Dobson Ap. Habitat fragmentation in the temperate zone. 1986.

(Originally published in Conservation Biology: The Science of Scarcity and Diversity. Sinauer Associates Inc., Sunderland, 1986.)