

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,

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

Traffic on Squilchuck and Mission Ridge Road: The project predicts 10,000 vehicle trips per day on the Mission Ridge Road, which is roughly double the traffic on both Stevens Pass and Blewitt Pass. The DEIS predicts that the development will snarl traffic to a condition below minimum Chelan County standards, yet the DEIS does not include mitigation or improvements to the Mission Ridge Road. The Chelan County Comprehensive Plan Goal 1.9 is "...*deny approval of any development proposal that would cause a roadway segment to fall below the adopted minimum level of service...*". Our community should not be burdened by snarled traffic that financially benefits a developer but hurts the rest of us.

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

WDFW Land Exchange: Section 25 is owned by the Washington State Department of Fish and Wildlife and encompasses Windy Ridge and Bowl 4, the upper half of Chair 4, and overlaps with the proposed project. Per the DEIS, WDFW said: "...*an expanded, year-round ski resort is not an allowable use of the land under the U.S. Fish and Wildlife Service (USFWS) contract that funded WDFW's purchase of the property.*" Hunters use the section during archery and rifle seasons as well as for forest grouse hunting. Mule deer, Colockum Elk, golden eagles, goshawks, pika, marmots, bobcats, mountain lions, coyotes, and black bears regularly use the section's wildlife corridors. Section 25's whitebark pine forests, springs and wetlands, talus slopes, and undisturbed shrub-steppe openings are vital wildlife habitats. This section grows

H. Mike,
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being sent, in case my
email did not arrive
Thanks,
Diane Kunkel

more important as development threatens to destroy similar habitats on adjacent parcels. The DEIS discusses a land exchange between WDFW and Washington State DNR that would result in DNR owning Section 25 and implying that an expanded year-round resort would be allowable on DNR-owned Section 25. However, the DEIS further states that: "*The land swap is not part of the current Proposed Project...*". With the land exchange not on the table, the likelihood that it is illegal for DFW to swap the land, and DFW indicating that expanded year-round activity is not an allowable use of Section 25, Section 25 should be excluded from any expanded ski resort or development activity.

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

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

Thank you for considering my comments.

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