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Mission Ridge Expansion Master Planned Resort Draft EIS
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I am writing to express my concerns and comments on the Draft Environmental Impact Statement for the Mission Ridge Expansion Master Planned Resort, dated September 2025. I appreciate your taking my comments into consideration.

I've been a Wenatchee Resident for 11 years. I am opposed to the Mission Ridge Expansion for multiple reasons, but as an architect by profession, and a resident of this town, I am strongly opposed to the proposed development primarily because of the information addressed under Section 4.2 Fire Risks, which is noted as having an Impact Finding of **significant and unavoidable adverse impacts** in Table ES-3 Summary of Identified Construction and Operation Impacts from the Proposed Project.

Fire Risks

"Wildfire season" is now regrettably a predictable occurrence in the Pacific Northwest and it is something that residents of Wenatchee anxiously anticipate and dread. All credible scientific data points to increasing fire dangers in the coming years. The DEIS openly acknowledges the increased wildfire risks associated with the development, yet fails to address the very serious concern of adequate emergency egress that the single lane road into and out of Mission Ridge would provide.

Section 4.2.1.1 notes that:

- "The quantity of acres burned by wildfire in forested areas of Central Washington is projected to double through the 2020s and increase 4-fold by the 2040s"
- "The Stemilt and Squilchuck Basins are areas of high wildfire risk, and the risk of wildfires is only anticipated to increase into the future."
- "The assessment identified a majority of the Proposed Project Area as a 'high hazard' severity"

Despite acknowledging this, they are proposing that the Mission Ridge parking lot "**may** satisfy National Wildfire Coordinating Group (NWCG) and National Institute of Standards

and Technology (NIST) standards for safety zones **where persons can safely remain without additional fire protection** due to sufficient distance from combustible materials and vegetation. **Other areas where defensible space exists in its current condition are the ski trails and chairlifts** where natural fuel breaks occur between trees and buildings such as the ski lift stations, which are surrounded by rock and dirt with minimal fuel growth.” It is unacceptable that they are proposing that people evacuate to a location that *might possibly satisfy* the standards of a safe zone in a fire emergency. If they are unable to provide a safe means of egress off the mountain, they need to be 100% certain, that this alternative to evacuation, does in fact satisfy these standards as a safety zone. I personally am skeptical of the idea that in the event of a wildfire, people would be expected to just stand around in an unsheltered open parking lot, and wait out a wildfire. Are they seriously proposing that in the event of a wildfire, people should “take refuge” by standing in the middle of a ski run? The idea is terrifying and seems absurd. If this is actually part of the development’s fire management strategy the DEIS needs to be revised to provide a site specific analysis justifying these open, unsheltered areas as adequate safe zones that meets all the requisite criteria of such a safety zone.

Section 4.2.1.6 Acknowledges **that the proposed development** will result in an “increase in population at the Proposed Project Area, particularly during the summer season when fire risk is high” and that **“has the potential to compound limited emergency egress access down Mission Ridge road.”** The DEIS goes on to say that **“Having more than one evacuation route provides redundancy and increased safety, particularly during unexpected or fast-moving events.”** But that “Having a single wider and well-maintained access route can serve this same function under CCC.” I would like to see the justification of this statement. I do not concede that a single, wider road with “driveable shoulders” provides redundancy or increased safety, nor do I think it would provide an equivalent level of safety as that of a code compliant two-lane road. I would also like the DEIS to confirm that this proposed 28 foot roadway width meets or exceeds the minimum Chelan County design standards.

Section 4.2.2.2 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 an International Fire Code requirement which the developer has cited as being impractical. Creating the secondary access might be challenging and expensive, but given the fire life safety risks associated with having a single egress route, it feels of paramount importance that Chelan County be certain that providing the secondary access is technically infeasible, not just inconvenient to the developer. The DEIS cites the EcoSign (2022) and AEGIS (2023) findings that “secondary access was not practical, **due mostly to the volume of excess cut material that would need to be hauled off-site and many of the underlying properties not being owned by the Applicant**”. These technicalities are not things that lend this construction to be

technically infeasible; they are merely inconveniences and expenses to the developer. Excess cut material does not justify the project's lack of a secondary emergency egress route, and if easements are needed to be obtained from private property owners for construction of the secondary access, then there is a very standard means for obtaining them. Lastly the DEIS notes in this section that "The greatest risk to the public from lack of secondary access would occur during a wildfire. However, the greatest wildfire risk is unlikely to create a critical egress risk." I would like clarification on this statement; it seems to me like having a lack of secondary egress during a wildfire event is precisely the type of thing to create a critical egress risk.

Given what the applicant has stated in the DEIS and given the associated life safety risks and consequences, I do not understand on what grounds Chelan County would be willing to waive the secondary access requirement.

Section 4.2.3.3

In the DEIS summary of this section, it notes "**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.**" It then goes on to say that "**These impacts can be partially mitigated for as described in Section 4.2.3.3.**" It's astonishing that the DEIS opening acknowledges the likely increase in fire danger during the high fire-risk season, yet in response to that, proposes only *partial mitigation* to those impacts. Why would the development not be required to *fully mitigate* these impacts? If these increased fire risks cannot be adequately and fully mitigated by the development, the project should not be allowed to move forward.

A closer look at the proposed mitigation measures listed under Construction and Operation Risk Reduction proves to be basic code minimum requirements for new construction; nothing being proposed here goes above or beyond what is required by the building code, or the fire code. The proposed Fuels Reduction and Defensible Space actions are standard practice development standards for new construction in most jurisdictions located in high fire risk locations. The Emergency Access Plans and Evacuation Rescue Plans are also standard practice code requirements. These are not *additional safety measures* that the applicant is proposing and should not be considered an adequate means of offsetting the acknowledged increased fire danger that the development poses.

Under the subsection, Additional Proposed Mitigation Measures - Wildfire Management, the applicant lists several strategies for egress in the event of a fire emergency, all of which deserve further scrutiny if they are to be taken seriously and considered as adequate means of managing life safety of the residents and staff during the chaos of an actual fire emergency. A shuttle service composed of a total of 3 shuttle vehicles, 10 random other vehicles, and Mission Ridge staff vehicles are proposed for evacuation.

Seriously - mission ridge staff vehicles are being proposed as a means of evacuating people down the mountain in an emergency? You've got to be kidding me that this is part of their official emergency evacuation plan. With an insufficient number of seats on the shuttle vehicles to accommodate everyone needing evacuation, I would like to know who will be allowed to be first on this limited capacity shuttle service in the event of an emergency, and how that determination is ever going to be made! The proposal of using limited capacity shuttle service to evacuate a small percentage of the people needing evacuation is a ridiculous attempt at providing a safe means of evacuation for all of the people who will need it.

I also do not understand the proposed evacuation strategy to shuttle people to Squilchuck State Park in the event of a fire emergency. There is no safe place for people to wait out a wildfire at Squilchuck State Park; it is nothing but open forest, vulnerable itself to wildfire risks. How is this location being considered a safe place to send people during a wildfire? There is a strategy that lists "additional egress pathways for visitors" that "will provide additional safety options in the event of a fire", but no additional information is given as to what these "pathways" would be or where they might go. The strategies listed here are so ridiculous it is hard to take them seriously.

Under the subsection, Additional Applicant Proposed Mitigation Measures - Egress During Wildfire Season, the DEIS states that the applicant has proposed additional mitigation efforts in the form of an Updated Crisis Action Plan, noting a hierarchy of intended egress methods. The **number one strategy listed**, having the greatest impact on safe evacuation during a fire emergency, is that the **"Primary egress will remain along Mission Ridge Road"**. So the DEIS again emphasizes the significance of Mission Ridge Road as being the primary, and **ONLY** emergency evacuation route for people, and yet a secondary access route from the proposed development is not being required. Why would this be permitted?

I would like the DEIS to clearly outline what is meant by their shelter-in-place strategy, which is listed as the second "egress method" of their Crisis Action Plan. I am familiar with the Chelan County Fire Evacuation Levels (1, 2, 3, go!) but I have never heard of shelter-in-place as a strategy for residents in the event of a fire that is threatening their property. This strategy is particularly concerning given the development's proposed code minimum standard of construction in terms of buildings' resistance to fire danger.

The third egress method listed in the Crisis Action Plan lists the actions that are to be taken when evacuation is required due to a fire emergency. The single lane Mission Ridge Road is again noted as the primary egress route. It then goes on to say that in the event that the single vehicle lane becomes blocked, that "Mission Ridge will work with local fire authorities to determine best options for protecting public health until Mission Ridge Road is again passable" and then lists some possible options. It is completely unacceptable that they do not have a concrete plan in place now for how to mitigate this

very likely scenario of having the only egress lane blocked in the event of a fire emergency. The DEIS must be revised to adequately address this concern.

Of the options given as alternatives to evacuating the development via Mission Ridge Road, in the event that the single egress route is blocked, all of them deserve sincere scrutiny to be taken seriously as plausible options. Among these options, shelter-in-place is again listed. So in the event of a fire emergency, when evacuation is required, and the only way out is blocked, they are proposing that people should turn around and go back inside their houses and just wait it out. I'm sorry, but this is just preposterous. Another option listed is that "Evacuation of some portion of the residents/visitors via existing unimproved roads/trails to Squilchuck State Park". Are they seriously proposing that if a wildfire threatens the community there, and an evacuation order is given, and Mission Ridge Road is unusable, that people are expected to evacuate on foot, via trails through the forest? The fact that they would even include such a ludicrous suggestion is indicative of the lack of genuine concern they have for the real life safety conditions that a wildfire poses to this development. The proposed Crisis Action Plan is unacceptable as written, and needs to be revised to provide a realistic, executable strategy for the safe emergency evacuation of the entire population of the proposed development.

This photo was taken of the recent Sugarloaf Fire. I am terrified to look at this image, to imagine this type of fire threatening the proposed Mission Ridge development, and the resulting chaos of the non-code compliant, slipshod fire mitigation and emergency evacuation strategies that the applicant is proposing. It's just not acceptable.

