

Subject: Mission Ridge Master Planned Resort Expansion – DEIS Comments and Request for No-Action Alternative

October 20, 2025

Mike Kaputa, Director
Chelan County Department of Natural Resources
SEPA Responsible Official
missionridgeeis@outlook.com

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 comment on the Draft Environmental Impact Statement (DEIS) for the proposed Mission Ridge Master Planned Resort (MPR) Expansion. I am writing as a lifelong resident of Wenatchee and someone who grew up skiing at Mission Ridge. I strongly oppose this proposal and urge Chelan County to support the No Action Alternative.

The DEIS contains substantial omissions, misleading conclusions, and inadequate mitigation measures. It fails to meet SEPA's requirement for a complete and scientifically defensible analysis and is inconsistent with Chelan County's Comprehensive Plan, fire and safety codes, and MPR criteria. These issues cannot be corrected through further modification—the only appropriate course of action is for Chelan County to select the No Action Alternative and preserve the land, wildlife, and community character that make the Squilchuck and Mission Ridge area irreplaceable.

1. Traffic and Infrastructure Impacts

The DEIS predicts up to 10,000 vehicle trips per day on Mission Ridge Road—roughly double the combined volumes of Stevens Pass and Blewett Pass. This would degrade road performance to a level below the County's adopted minimum Level of Service (LOS) standards.

Chelan County Comprehensive Plan Goal 1.9 requires denial of any development that causes a roadway segment to fall below LOS standards.

The DEIS acknowledges degraded LOS but does not propose required mitigation.

Multiple intersections (Pitcher Canyon, Wenatchee Heights, Kray Ike, Saddlehorn, Halverson Canyon, and others) were excluded from analysis.

The Traffic Impact Analysis also relies on faulty Highway Capacity Manual (HCM) assumptions, using “base condition” values that allow passing—conditions that do not exist on the steep, narrow Mission

Ridge Road. The analysis must be recalculated using HCM Equation 15-9 for no-passing conditions.

Without mitigation, Squilchuck Road and Mission Ridge Road will experience traffic volumes similar to urban arterials. This violates Comprehensive Plan Goals 1.8 and 1.9, which require preservation of the rural character of County roads.

2. Secondary Access and Life Safety

Secondary access is not optional; it is a code requirement for developments generating more than 400 average daily trips under Chelan County Code 15.30.230(4). The DEIS improperly treats a second access route as an “alternative” when it is mandatory for life safety.

The single 28-foot “wider” road is inadequate, both in width and redundancy. Section 4.2.1.6 of the DEIS itself admits that “Having more than one evacuation route provides redundancy and increased safety.” To claim that a single route can “serve the same function” is misleading and unsafe.

Further, the DEIS proposes a “shelter-in-place” strategy without confirming whether the designated safe zones (including the Mission Ridge parking lot) meet National Wildfire Coordinating Group (NWCG) or NIST standards. Independent fire analysis shows that the lot’s size and slope render it insufficient for even one vehicle and three people during a fast-moving wildfire.

Chelan County must require a second operational egress road before occupancy, per CCC 11.89.040(8), and conduct a full wildfire evacuation modeling study to assess risk to life safety.

3. Fire Risk and Emergency Services

The DEIS systematically downplays wildfire hazards:

It assumes “moderate” risk of wildfire from the north despite mapping the area as “High to Very High” Wildfire Hazard Potential.

It relies on future fuel treatments that are not enforceable permit conditions.

It ignores the region’s worsening beetle-kill conditions, which drastically increase ignition and spread potential.

The DEIS also proposes that Chelan County build a new fire station “at the discretion of the fire district,” using County funds. This contradicts CCC 11.89.040(10), which requires that all service capacity increases be paid for by the developer. Chelan County Fire District #1’s 2020 comment letter states the District lacks capacity to serve the project without new apparatus and facilities.

All fire and basic life support infrastructure must be developer-funded, constructed, and operational prior to occupancy to comply with County code.

4. Water Quantity, Quality, and Legal Rights

The project would withdraw up to 240 acre-feet per year of groundwater from the Squilchuck Basin before connecting to the PUD water system. This will directly impact baseflow in Squilchuck Creek

and reduce supply to downstream senior water rights holders, who already face 50–75% curtailments most years.

The DEIS claims “no impairment” to existing rights based on “authorized but unused” quantities. This is a legal misinterpretation—unused portions of water rights are not vested and cannot justify new withdrawals under state law.

The wastewater proposal compounds the risk. The DEIS provides no soil suitability analysis for drainfields and relies on a speculative wastewater treatment plant (WWTP) that “may be feasible with new technology.” This is inadequate under WAC 173-240-060, which requires completed engineering reports before project approval.

The DEIS must be revised to include verified hydrological modeling, groundwater drawdown impacts, WWTP feasibility studies, and acknowledgment that pharmaceuticals and PFAS in domestic effluent will contaminate Squilchuck Creek.

5. WDFW Land (Section 25) and Wildlife Habitat

Section 25, owned by the Washington Department of Fish and Wildlife, includes critical habitats: elk and mule deer corridors, pika talus fields, wetlands, and whitebark pine stands. WDFW has explicitly stated that year-round resort use is not an allowable use under its federal acquisition contract.

The DEIS misleadingly references a speculative land swap with DNR, even though it admits the exchange “is not part of the current proposal.” This is a fundamental misrepresentation that invalidates the inclusion of Section 25 in the analysis.

Trail camera evidence and WDFW observations document active use by elk, deer, golden eagles, and goshawks. Destruction of these habitats would violate CCC 11.78 (Fish and Wildlife Habitat Conservation Areas), which requires avoidance and mitigation of impacts prior to land use approval.

Section 25 must be removed from the project scope in any revised EIS.

6. Master Planned Resort Overlay Violations

The project fails nearly every requirement of the Master Planned Resort (MPR) overlay under CCC Chapter 11.89:

- It is not self-contained and depends on Wenatchee for schools, utilities, and emergency response.
- It does not consist primarily of short-term accommodations; 265 single-family and 621 multi-family units are residential.
- It lacks affordable employee housing.
- It fails to preserve rural character, environmental integrity, or the natural resource it uses.

Without MPR approval, this density violates the Washington State Urban Growth Act (RCW 36.70A). Granting MPR status under these conditions would set a precedent for unchecked urban sprawl into

resource lands.

The DEIS must be revised to compare the proposal honestly against MPR requirements and recommend denial of MPR designation.

7. Visual, Light, and Noise Impacts

The DEIS mischaracterizes construction and operational lighting as “temporary” despite a 20-year build-out schedule. The lighting inventory is incomplete and fails to address impacts on dark skies, migratory birds, and the Manastash Ridge Observatory.

Proposed night operations would increase visible skyglow valley-wide, violating the intent of CCC 11.88.080 and diminishing the region’s rural and natural aesthetic.

Noise impacts are similarly understated. The DEIS incorrectly claims the nearest homes (Forest Ridge) are “3 miles away”; in reality, they are 0.4 miles. Using this false distance, the analysis underestimates sound levels by roughly 25 dBA. Construction and traffic noise during a 20-year “temporary” period will permanently alter the soundscape of the valley.

8. Recreation, Access, and Public Use

The DEIS claims the project will “enhance recreational opportunities,” yet it reduces public access to the Lake Clara Trailhead, eliminates existing trail parking, and extends private resort boundaries across public land used by backcountry skiers, snowshoers, and hunters.

Crowding from 100,000 new skier visits per year and a population of 4,000 residents will degrade the very experience that attracts visitors to Mission Ridge. Recreation displacement is not a “minor” impact; it is significant and irreversible.

9. Community, Culture, and Character

Beyond the technical and legal violations, this proposal threatens the cultural heart of the Wenatchee Valley. Mission Ridge has always been our hometown hill—a place of community connection, not commercialization.

I grew up skiing here. It’s where families gather on winter mornings, where friends reconnect on the chairlift, and where every run feels special and rooted in our shared sense of place. To replace that with a sprawling luxury resort—parking for 5,500, 7,812 beds, and 4,000 year-round residents—would erase what makes Mission Ridge meaningful.

The DEIS dismisses these social and cultural impacts, but SEPA requires their consideration under WAC 197-11-444(2)(b).

10. Conclusion and Requested Actions

The DEIS is incomplete, inconsistent, and in multiple sections misleading or legally deficient. It fails SEPA standards for full disclosure and fails Chelan County Code requirements for transportation,

safety, utilities, and land use.

I respectfully request that Chelan County:

- Reject the current DEIS and require a revised and recirculated version addressing the deficiencies above;
- Reevaluate wildfire evacuation, water rights, MPR compliance, and cumulative traffic impacts; and
- Select the No-Action Alternative to preserve the rural character, safety, and ecological integrity of the Squilchuck and Mission Ridge area.

Thank you for your attention and for upholding the integrity of Chelan County's codes, community values, and environmental stewardship.

Sincerely,

Chelsea Short Morin

200 Jennings St

Wenatchee, WA 98801

c.shortmorin@gmail.com | 509-630-535