



North Central Washington Audubon Society  
P.O. Box 2934  
Wenatchee, WA 98807  
[www.ncwaudubon.org](http://www.ncwaudubon.org)

March 26, 2020

Mr. RJ Lott, Planning Manager  
Community Development Department  
Chelan County  
316 Washington Street, Suite 301  
Wenatchee, WA 98801

Re: Proposed Mission Ridge Expansion

Dear Mr. Lott,

North Central Washington Audubon Society (NCWAS) is a local chapter of the National Audubon Society with approximately 500 members in Chelan, Douglas, Okanogan, and Ferry counties. As long-term contributors to the Stemilt Partnership, we have been involved with issues in the Stemilt basin and our greater community for many years. We are concerned that the proposed expansion at Mission Ridge would result in a number of potential adverse impacts to our community.

The proposal has two major components. One is ski area expansion. The other is a private, year-round real estate development roughly ten times the size of the nearby Forest Ridge community.

Below are two issues of particular concern to us:

**The proposed development would violate the Stemilt Partnership Mission.** Chelan County is the lead organization responsible for establishing the Stemilt Partnership. The Partnership was formed in 2007 in response to concern over privatization and development of 2,500 acres of Washington State DNR forested land in the Stemilt Basin. In 2012, Chelan County purchased 2,500 acres in order to prevent development in the forest. The Stemilt Partnership continues to meet to discuss management of the Stemilt-Squilchuck Community Forest. The mission of the Partnership is to protect water resources, conserve critical habitat for fish and wildlife, and maintain recreational access to public lands. The proposed development goes against the founding rationale of the Partnership and violates all three of its central goals by substantially increasing water demand of already overallocated water resources; creating a large urban environment in the forest,

which will disrupt wildlife; and degrading existing and planned recreational activities and experiences. How can Chelan County even consider allowing the type of development that the Stemilt Partnership was formed to prevent?

**The proposal could have significant adverse impacts on water resources.** The Water Resource Inventory Area (WRIA) 40A Watershed Plan for the basin states, “Annual water rights are about 50 percent greater than the estimated quantity of physically available water. Water diverted for new storage potentially impairs senior rights and/or requires mitigation of impacts to senior rights”. The proposal assumes water will be available to operate and protect from wildfire a community of 4,000. Meanwhile, senior water rights held by downstream irrigating orchardists and others in the basin could result in insufficient water availability during wildfire season. We believe the Hydrology Memorandums in the proposal, prepared by WNR Group Inc. (hired by the Developer), are inadequate. They state “The preliminary hydrologic investigation at the site has determined that the availability of future water needs **may** be present in deep bedrock fractures,” and “These deep bedrock fractures appear to be in hydraulic continuity with the surface waters near the ski area where current water right diversions are being utilized”. WNR Group assumes peak water usage will be during the ski season, yet the real estate development portions of the proposal are clearly year-round. Also of concern, WNR Group does not address forecasted climate change for east-side Cascades. At the very least, the County needs to work with the USFS to hire a Hydrologist to properly evaluate these uncertainties.

We oppose the proposed expansion as currently envisioned. The concerns and questions we mention above are just some of many the proposal raises. Other issues include sewer issues, wildfire risk, wildlife habitat loss, urban growth, and greatly increased traffic. Given the enormous impacts the current proposal would bring to the basin, we advise against moving forward with any aspect of it pending a thorough evaluation of the many issues it presents. An adequate evaluation will take substantial time, and we request the process be given whatever time is necessary. The overriding goal must be to get it right.

Sincerely,

A handwritten signature in cursive script that reads "Arthur Campbell".

Arthur Campbell  
President, North Central Washington Audubon Society



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Wenatchee, WA 98807  
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March 26, 2020

Mr. Jeffery Rivera, District Ranger  
Wenatchee River Ranger District  
U.S. Forest Service  
600 Sherbourne  
Leavenworth, WA 98826

Re: Proposed Mission Ridge Expansion

Dear Mr. Rivera,

North Central Washington Audubon Society (NCWAS) is a local chapter of the National Audubon Society with approximately 500 members in Chelan, Douglas, Okanogan, and Ferry counties. As long-term contributors to the Stemilt Partnership, we have been involved with issues in the Stemilt basin and our greater community for many years. We are concerned that the proposed expansion at Mission Ridge would result in a number of potential adverse impacts to our community.

The proposal has two major components. One is ski area expansion. The other is a private, year-round real estate development roughly ten times the size of the nearby Forest Ridge community.

Below are two issues of particular concern to us:

**The proposed development would violate the Stemilt Partnership Mission.** While Chelan County is the lead organization responsible for establishing the Partnership, USFS is a founding member. The Partnership was formed in 2007 in response to concern over privatization and development of 2,500 acres of Washington State DNR forested land in the Stemilt Basin. In 2012, Chelan County purchased 2,500 acres in order to prevent development in the forest. The Stemilt Partnership continues to meet to discuss management of the Stemilt-Squilchuck Community Forest. The mission of the Partnership is to protect water resources, conserve critical habitat for fish and wildlife, and maintain recreational access to public lands. The proposed development goes against the founding rationale of the Partnership and violates all three of its central goals by substantially increasing water demand of already overallocated water resources; creating a large urban environment in the forest, which will disrupt wildlife; and degrading existing and planned recreational activities and experiences. How can the USFS even consider allowing the type of development that the Stemilt Partnership was formed to prevent?

**The proposal could have significant adverse impacts on water resources.** The Water Resource Inventory Area (WRIA) 40A Watershed Plan for the basin states, “Annual water rights are about 50 percent greater than the estimated quantity of physically available water. Water diverted for new storage potentially impairs senior rights and/or requires mitigation of impacts to senior rights”. The proposal assumes water will be available to operate and protect from wildfire a community of 4,000. Meanwhile, senior water rights held by downstream irrigating orchardists and others in the basin could result in insufficient water availability during wildfire season. We believe the Hydrology Memorandums in the proposal, prepared by WNR Group Inc. (hired by the Developer), are inadequate. They state “The preliminary hydrologic investigation at the site has determined that the availability of future water needs **may** be present in deep bedrock fractures,” and “These deep bedrock fractures appear to be in hydraulic continuity with the surface waters near the ski area where current water right diversions are being utilized”. WNR Group assumes peak water usage will be during the ski season, yet the real estate development portions of the proposal are clearly year-round. Also of concern, WNR Group does not address forecasted climate change for east-side Cascades. At the very least, the USFS needs to work with the County to hire a Hydrologist to properly evaluate these uncertainties.

We oppose the proposed expansion as currently envisioned. The concerns and questions we mention above are just some of many the proposal raises. Other issues include sewer issues, wildfire risk, wildlife habitat loss, urban growth, and greatly increased traffic. Also, the Chelan County Master Plan shows white bark pine (and therefore also its obligate bird species, Clark's nutcracker) is present both in the private development parcel and immediately adjacent to the existing ski area. The white bark pine is a candidate species under the Endangered Species Act, and a thorough evaluation of the proposal's impacts on both species needs to be included in your analysis.

Given the enormous impacts the current proposal would bring to the basin, we advise against moving forward with any aspect of it pending a thorough evaluation of the many issues it presents. An adequate evaluation will take substantial time, and we request the process be given whatever time is necessary. The overriding goal must be to get it right.

Sincerely,



Arthur Campbell  
President, North Central Washington Audubon Society