



North Central Washington Audubon Society
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October 20, 2025

Mr. Mike Kaputa, Director
Chelan County Natural Resource Department
SEPA Responsible Official
missionridgeeis@outlook.com
411 Washington Street, 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. 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. We strongly oppose the development and urge you to select the No Action Alternative.

The DEIS, despite its substantial size, is full of impact omissions, inadequate mitigation of potential impacts, and incorrect assertions. We have serious concerns about numerous impacts the proposed development would have on the area, including the various natural habitats and the wildlife they support, the local community, and climate disruption. Climate has been identified as the most serious challenge facing birds, which is our organization's primary concern. For this reason, we'll focus most closely on that issue, while also addressing aspects that would negatively impact the interests of wildlife in general, the local community, and recreating public.

Regarding the project's climate impact, consider the massive amount of greenhouse gases that would be released by the project beginning with construction and continuing daily in perpetuity as people commute (10,000+ expected trips a day) to and from the area. Also consider the amount and constant need for commodities (groceries etc.) that would be required to support the thousands of people living at or visiting the site. Transportation to supply and support all of this would be massive and endless. Even if there weren't numerous other concerns, the threats the project would pose to climate alone, are reason enough to deny it.

We've gone through the DEIS, and it does mention the issue of climate. However, in our opinion, it essentially glosses it over and fails completely to quantify the project's short and long-term climate emissions. The Final EIS should correct this oversight and assure the project's compliance with laws addressing state agency oversight mandates and responsibilities including:

WAC 197-11-060

Content of environmental review.

- (a) SEPA's procedural provisions require the consideration of "environmental" impacts (see definition of "environment" in WAC 197-11-740 and of "impacts" in WAC 197-11-752), with attention to impacts that are likely, not merely speculative. (See definition of "probable" in WAC 197-11-782 and 197-11-080 on incomplete or unavailable information.)
- (b) In assessing the significance of an impact, a lead agency shall not limit its consideration of a proposal's impacts only to those aspects within its jurisdiction, including local or state boundaries (see WAC 197-11-330(3) also).
- (c) Agencies shall carefully consider the range of probable impacts, including short-term and long-term effects. Impacts shall include those that are likely to arise or exist over the lifetime of a proposal or, depending on the particular proposal, longer.
- (d) A proposal's effects include direct and indirect impacts caused by a proposal. Impacts include those effects resulting from growth caused by a proposal, as well as the likelihood that the present proposal will serve as a precedent for future actions...

WAC 197-11-960

Environmental checklist.

2. Air (a.) What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Also, of general concern to NCWAS, is the proposal's inconsistency with the vision and guidance of long-term community planning as guided by the Stemilt Partnership, the Stemilt-Squilchuck Community Vision Report, the Stemilt-Squilchuck Recreation Plan, the Chelan County Comprehensive Plan, the Our Valley Our Future (OVOF) Action Plan, WRIA 40A Watershed Plan, and the WRIA 40A Water Quality Analysis. Taken as a whole, the above processes represent the values and conclusions expressed by the contribution of numerous public interests and individuals.

Regarding the Master Planned Resort Overlay (MPR), we believe it fails to meet MPR requirements, as the proposed development:

- would not fully mitigate impacts.
- is not primarily a destination resort.
- would not be self-contained.
- does not consist only of short-term visitor accommodations.
- would not preserve the rural character or natural resources of the area it would be imbedded in.

Consequently, we believe it would constitute a violation of the Urban Growth Act.

The economic/financial analysis of the cost of providing services to the project should detail Who Pays, How Much, and When. If allowed designation as a Master Planned Resort (MPR), RCW 36.70A.360 requires all costs for facilities and utilities provided to the MPR be paid for by the developer. This DEIS states otherwise and, therefore, a MPR wouldn't apply.

The issue of light pollution is also of concern, as it poses serious issues for birds that migrate at night. The DEIS fails to address the project's impact on Dark Skies. This oversight should be addressed going forward.

We could go further regarding the DEIS' numerous other deficiencies including the interests of wildlife other than birds (elk, deer, various predators, etc.), the associated increased wildfire risks and the associated ingress/egress issues, inadequate infrastructure (water for example), and insufficient analysis of the project's impacts to nearby trails, public recreation, and parking. Suffice it to say, the DEIS, in our opinion, is deficient in way too many ways.

In summary, for the reasons mentioned above, in our opinion, the DEIS is so deficient as to be a non-starter. We, therefore, strongly encourage selection of the "No Action Alternative".

Sincerely,

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

Arthur Campbell
President, North Central Washington Audubon Society