



**DEPARTMENT OF
NATURAL RESOURCES**

**ENVIRONMENTAL & LEGAL AFFAIRS –
SEPA CENTER**
PO BOX 47015
OLYMPIA, WA 98504-7015

360-902-1739
SEPACENTER@DNR.WA.GOV
WWW.DNR.WA.GOV

May 16th, 2022

Greta Smith, District Ranger
Darrington Ranger District
1405 Emens Avenue North
Darrington, WA 98241

RE: Stillaguamish Public Meeting and NEPA Notice

To Whom It May Concern:

Thank you for the opportunity to review and comment on the Stillaguamish Public Meeting and NEPA Notice.

Consideration of State and local issues and standards is consistent with NEPA regulations in 40 CFR 1501.1 Purpose (b) in part to coordinate with State and local agencies, 40 CFR 1502.16 Environmental consequences (c) in part to include discussions of possible conflicts with State and local land use plans, policies and controls for the area concerned, and 40 CFR 1500.2 Policy (c) and (f) to avoid or minimize adverse effects of proposals upon the quality of the human environment.

The proposed Stillaguamish Landscape Analysis has a concern which the Washington State Department of Natural Resources (DNR) would like addressed at this point.

Roads

DNR's road system is a valuable asset to the trusts. Use of the roads by the project proponent contributes to increased road maintenance and replacement needs. DNR wants to ensure USFS contributes fairly to maintenance.

The current proposed Stillaguamish Landscape Analysis does not appear to address critical issues relevant to the project and to both agencies. Currently the N. Mountain Road (FS 2810) appears to be the primary means of ingress and egress for the recreational traffic generated by the creation of new recreational opportunities within this project.

The United States Forest Service (USFS) has submitted proposed plans for the creation of four additional parking areas, as well as the addition of a trailhead and gate. While the (DNR) is a strong supporter of recreation, and providing new opportunities to the citizens of Washington State, these additional areas, utilizing the N. Mountain road highlights a serious difference in position between the agencies.

Currently, the USFS claims the N. Mountain Road as a USFS System Road. Unfortunately, the easement rights granted to the USFS over the road do not fully support this position. Easements granted to the USFS may not allow public access over the private and State landowners. DNR has had a number of meetings requesting the USFS to consider inclusion of this road into the Forest Roads and Trails Act (1964) as a cost share road. Such an inclusion, would provide a number of benefits to both agencies, and the public. These meetings have not been able to resolve this issue as yet.

The N. Mountain Road has been historically maintained by the DNR while conducting DNR timber sale harvests. N. Mountain Road has been designed as a single lane gravel road for the purpose of resource extraction, and not public travel.

The addition of these additional recreational areas, without an increase in USFS maintenance obligations and road improvements, will likely result in an increase of traffic, environmental damage (sediment delivery), damage to natural resources, off-site public trespass, litter, and higher risk for public injury from users on the road and the general public.

Over the course of these meetings, the USFS has expressed a long term position of possibly surrendering their easement rights over the N. Mountain Road back to the fee owners. A concern of DNR is the possible conflict between the USFS potential long term goal of surrendering the easements within the proposed new recreational sites as identified in the Stillaguamish Landscape Analysis meeting its planned goals.

One means of resolving this issue, is for the USFS to accept and move forward with the DNR's proposal of bringing the road into the USFS Cost Share Program.

SEPA/NEPA

The State Environmental Policy Act (SEPA) requires sufficient information that discloses the significant adverse environmental impacts of the proposal and alternatives, discusses the effectiveness of possible mitigation measures that would significantly mitigate the impacts, and provides for making a reasoned choice between alternatives. DNR's position is that this project requires additional consideration and consultation with DNR to resolve the many open issues on this road, and this proposal.

Impact analysis and coordination of SEPA and NEPA requirements are tied to standards set in the State Environmental Policy Act RCW 43.21C and the National Environmental Policy Act.

For additional information regarding SEPA/NEPA coordination and compliance please contact Kim Bauman (360) 463-3483.

Thank you,