

March 14, 2023

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

RE: North Fork Stillaguamish Landscape Analysis

To Whom It May Concern:

Thank you for the opportunity to review and comment on the draft Environmental Assessment (EA) for the North Fork Stillaguamish Landscape Analysis project.

The draft EA for the North Fork Stillaguamish Landscape Analysis project proposes actions that affect lands managed by the Washington State Department of Natural Resources (DNR) and DNR is hereby is formally submitting comment to the draft EA.

### **Roads and Easements**

Within the draft EA, the United States Forest Service (USFS) proposes to terminate road easements along Forest Service Road 2810000, otherwise known as North Mountain Road, from milepost 0.47 to milepost 6.65, as depicted in the attached Exhibit A map, which was adapted from Exhibit A of the Specialist Report on Transportation. DNR is generally in support of this proposal to terminate easements, with several additional comments.

DNR requests that in addition to terminating the above easements, the USFS also release their interest in North Mountain Road between milepost 9.5 and 13.82 in Sections 25 and 35 of Township 33 North, Range 9 East, as depicted in the attached Exhibit A, and as reserved in that deed recorded in Skagit County on August 16, 1990, under auditor file number 9008200041.

Terminating current easements held by the USFS along North Mountain Road may leave members of the public without clear access to parts of North Mountain that they currently have access to. Certain segments of North Mountain Road run over private ownership. The USFS releasing easement over North Mountain Road may leave certain segments over private ownership without legal public access. Unless the USFS takes action to provide continued public access on North Mountain road, these private landowners might gate the road system, and potentially jeopardize the public's access to recreation on North Mountain Road.

DNR ask that the USFS clearly notifies the public and users of the North Mountain Lookout that they will no longer have legal access to the areas they enjoy unless they access through the Texas Ponds road system, which may require maintenance and upgrade as part of this EA.

### **Recreation**

North Mountain Road receives significant traffic from recreational use. North Mountain Road is the access used commonly to access recreational areas on North Mountain and the surrounding area. DNR's concern is that local use and knowledge of this access will not be diminished with the USFS' relinquishment of easements and re-routing of traffic on North Mountain Road.

While DNR is a strong supporter of recreation, and providing new opportunities to the citizens of Washington State, recreationalists obtaining access to these additional areas will likely continue to utilize the North Mountain Road. The proposal to simultaneously increase recreation in the area and terminate easement over the main access road are in direct conflict with one another.

North Mountain Road has historically been maintained by DNR while conducting timber harvests on DNR-managed trust lands. North Mountain Road has been designated as a single lane gravel road for the purpose of resource extraction, and not public travel. DNR acknowledges that the USFS' proposal to release easements along North Mountain Road will put the majority of road maintenance responsibility on DNR. The addition of these additional recreational areas, together with the USFS releasing their interest in the road will likely result in an increase of traffic, environmental damage (sediment delivery), damage to natural resources, off-site public trespass, litter, a higher risk for public injury from users on the road and a general overburden of the original intent of the road and its construction.

DNR also recognizes that by releasing their easements on North Mountain Road, the USFS puts the burden on DNR to shoulder the cost of obtaining public use easements from private landowners to keep existing recreation opportunities open to the public.

### **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 Cassie Davis at [Cassie.Davis@dnr.wa.gov](mailto:Cassie.Davis@dnr.wa.gov).

Thank you,

Cassie Davis  
Acting Rights-of-Way Program Manager  
WA State Department of Natural Resources