

From: [ECY RE NW SEPA \(NWRO\)](#)
To: [Amy Rusko](#)
Cc: [Gresham, Doug \(ECY\)](#)
Subject: Lindsay Subarea DEIS Comments - ECY SEPA 202504000
Date: Monday, October 27, 2025 7:46:25 AM
Attachments: [202504000_ECYCommentLetter.pdf](#)

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Good morning,

Thank you for the opportunity to comment on the Lindsay Subarea DEIS (Lead Agency File No(s). PLN #1315). Ecology's comments are attached.

[Statewide SEPA Register No. [202504000](#)]

Kelli Price (she/her)

ERTS & SEPA Coordinator

Department of Ecology | Northwest Region

Report an Environmental Concern [Online](#)



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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

October 27, 2025

Amy Rusko, Community & Economic Development Director
Community & Economic Development Department
City of Arlington
18204 59th Ave NE
Arlington, WA 98223

Re: Lindsay Subarea Plan
File# PLN #1315, Ecology SEPA# 202504000

Dear Amy Rusko:

Thank you for the opportunity to provide comments on the State Environmental Policy Act (SEPA) Draft Environmental Impact Statement (DEIS) for the Lindsay Subarea Plan. Based on review of the documents associated with this project, the Department of Ecology (Ecology) has the following comments:

We support the goals and objectives for the Natural Environment stated in the Lindsay Subarea Plan. Specifically, we support:

1. Protecting and enhancing wetlands, critical areas, and their buffers to maintain ecosystem services.
2. Restoring the health of Edgecomb Creek and its tributaries.
3. Protecting fish and wildlife habitat in the subarea.
4. Preserving the Native Growth Protection Area (NGPA) and critical areas and their associated buffers.
5. Implementing a wetland mitigation plan to protect the wooded wetland.
6. Partnering with the Tulalip Tribes to restore fish passage and ecological functions in Edgecomb Creek.

The wetlands delineated on this property would be waters of the state subject to the applicable requirements of state law (see RCW 90.48 and WAC 173.201A) and Section 401 of the Clean Water Act (33 USC §1341) and 40 CFR Section 121.2. If any direct wetland impacts are proposed, the applicant shall obtain all necessary state and federal authorizations prior to

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beginning any ground-disturbing activities or vegetation removal. To obtain state and federal authorization, you should provide:

- A jurisdictional determination from the U.S. Army Corps of Engineers stating which delineated wetlands on the property are under federal jurisdiction.
- A Joint Aquatic Resource Permit Application (JARPA) form for impacts to jurisdictional wetlands submitted to Ecology at ecyrefedpermits@ecy.wa.gov.
- For any non-federally regulated wetlands that the U.S. Army Corps of Engineers does not take jurisdiction for, submit a JARPA to Ecology at ecyrefedpermits@ecy.wa.gov so we can issue an Administrative Order.
- A mitigation plan for unavoidable wetland impacts following the standards in Wetland Mitigation in Washington State – Part 1: Agency Policies and Guidance (Ecology Publication #[21-06-003](#)).

Thank you for considering these comments from Ecology. If you have any questions or would like to respond to these comments, please contact Doug Gresham from the Shorelands and Environmental Assistance Program at (425) 429-1846 or by email at doug.gresham@ecy.wa.gov.

Sincerely,

Kelli Price

Kelli Price
SEPA Coordinator

Sent by email: Amy Rusko, arusko@arlingtonwa.gov

ecc: Doug Gresham, Ecology