CHAPTER 3 Land Use, Aesthetics, and Parks, Recreation, and Open Space

As part of the City of Monroe's SEPA programmatic SEIS evaluation of probable impacts relating to the 2024 Comprehensive Plan Update, this chapter describes land use, aesthetics, and parks, recreation, and open space within the study area and assesses potential impacts associated with the Proposed Action and No Action Alternative. For land use, topics addressed include land use planning and land use compatibility. For aesthetics, topics addressed include visual character, scenic viewsheds, and light and glare. Level of service is addressed for parks, recreation, and open space.

3.1 Affected Environment

Section 3.1 presents methodology, the regulatory context, and information about existing land use, aesthetics, and parks, recreation, and open space in the study area, which is defined as the City of Monroe and its Urban Growth Area (UGA).

3.1.1 Methodology

Section 3.1 describes the existing land uses in Monroe and 2015 Comprehensive Plan future land use designations. The analysis uses the most recent data available, generally from 2021 or 2022, and the City of Monroe 2015 Comprehensive Plan. This section also describes aesthetics and parks, recreation, and open space in Monroe. The summary of current conditions relies on geospatial information provided by the City of Monroe and Snohomish County, such as assessor tax parcel information (including current use codes), the 2021 Snohomish County Buildable Lands Report, and



future land use and zoning maps. The information is preceded by a summary of relevant and applicable state, regional, and local land use policies.

3.1.2 Regulatory Setting

The following regulations, plans, and policies apply to land use, aesthetics, and parks, recreation, and open space.

STATE REGULATIONS

Washington's Growth Management Act (GMA). GMA, adopted in 1990, mandates land use that accommodates for projected population growth and associated housing and employment needs. Planning needs to provide special consideration for environmental justice,¹ the reduction of health risks, and places added protections to human life and natural resources. GMA is primarily codified under Chapter 36.70A RCW, although it has been amended and added to in several other parts of the RCW and WAC. GMA includes 15 planning goals that guide the development and adoption of local comprehensive plans and development regulations. Goals related to land use, aesthetics, and parks, recreation, and open space are identified below:

- **RCW 36.70A.020 (1) Urban Growth.** Encourage development in urban areas in an efficient manner.
- RCW 36.70A.020 (2) Reduce Sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.
- RCW 36.70A.020 (9) Open Space and Recreation. Retain open space and green space, enhance recreational opportunities, enhance fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities.
- RCW 36.70A.070 (8) Park and Recreation Element. The park and recreation element of a comprehensive plan must contain at least the following features: (i) consistency with the capital facilities element as it relates to park and recreation facilities; (ii) estimates of park and recreation demand for at least a 10-year period; (iii) an evaluation of facilities and service needs; and (iv) an evaluation of intergovernmental coordination

¹ Environmental justice is the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. This goal will be achieved when everyone enjoys the same degree of protection from environmental and health hazards and has equal access to the decision-making process to have a healthy environment in which to live, learn, and work (Ecology 2024).



opportunities to provide regional approaches for meeting park and recreational demand. $^{\rm 2}\,$

• **RCW 36.70A.160 Open Space Corridors.** Directs local governments to identify lands that are useful for public purposes and to identify open space corridors within the urban growth area.

REGIONAL REGULATIONS

Puget Sound Regional Council's (PSRC) Regional Growth Strategy, VISION 2050. VISION 2050 encourages the use of resources, facilities, and infrastructure to support alignment and concurrency within Snohomish, King, Kitsap, and Pierce counties across building development, land use allocations, and level of service (LOS) needs. VISION 2050 includes the GMA-required Multicounty Planning Policies (MPPs) for the four counties and a regional strategy for accommodating growth through 2050. VISION 2050 includes 216 MPPs, organized around nine topic areas. MPPs applicable to land use, aesthetics, and parks, recreation, and open space are identified below.

- **MPP-DP-6.** Preserve significant regional historic, visual, and cultural resources, including public views, landmarks, archaeological sites, historic and cultural landscapes, and areas of special character.
- **MPP-DP-40.** Protect and enhance significant open spaces, natural resources, and critical areas.
- **MPP-DP-41.** Establish best management practices (BMPs) that protect the long-term integrity of the natural environment, adjacent land uses, and the long-term productivity of resource lands.
- **MPP-En-11.** Designate, protect, and enhance significant open spaces, natural resources, and critical areas through mechanisms, like reviewing policies and provisions.
- **MPP-En-12.** Identify, preserve, and enhance significant regional open space networks and linkages across jurisdictional boundaries.
- **MPP-En-15.** Provide parks, trails, and open space within walking distance of urban residents. Prioritize historically underserved communities for open space improvements and investments.
- **MPP-RGS-4.** Accommodate the region's growth first and foremost in the UGA. Ensure that development in rural areas is consistent with the regional vision and the goals of the Regional Open Space Conservation Plan (see below).

 $^{^2}$ Additional requirements are listed under the 2024 update to RCW 36.70A.070 (8), but they are options, as statewide funds have not been allocated to support their development.



Regional Open Space Conservation Plan. Developed in 2018, this conservation plan for King, Kitsap, Pierce, and Snohomish counties focused on protecting more than 400,000 acres of the region's at-risk farms, forest, natural areas, and aquatic systems.

Snohomish Countywide Planning Policies (CPPs). GMA requires counties and cities to collaboratively develop CPPs to set the general framework for coordinated land use and population planning between a county and its cities to ensure comprehensive plans are consistent with each other. Multiple policies mitigate impacts and achieve goals that also align with GMA, the Regional Growth Strategy, and MPPs. CPPs applicable to land use, aesthetics, and parks, recreation, and open space are identified below.

- DP-13. The county and cities should integrate the desirable qualities of existing residential neighborhoods when planning for urban centers and mixed use developments. Jurisdictions should adopt design guidelines and standards for urban centers to provide for compact, efficient site design that integrates building design with multimodal transportation facilities and publicly accessible open spaces.
- **DP-16.** Jurisdictions should encourage the use of innovative development standards, design guidelines, regulatory incentives, and applicable low-impact development measures to provide compact, high-quality communities.
- **DP-33.** Jurisdictions should minimize the adverse impacts on resource lands and critical areas from new developments through the use of environmentally sensitive development and land use practices.
- **DP-35.** Jurisdictions should identify and plan for the development of parks, civic places, and public spaces, especially in or adjacent to centers.
- **DP-38.** The county and cities should reduce disparities in access to opportunity for all residents through inclusive community planning and making investments that meet the needs of current and future residents and businesses.
- **ED-16.** The expeditious processing of development applications shall not result in the reduction of environmental and land use standards.
- **Env-2.** The county and cities should work collaboratively to identify, designate, and protect regional open space networks and wildlife corridors both inside and outside the UGA and across the jurisdictional boundaries.

LOCAL REGULATIONS

Monroe Municipal Code (MMC). The MMC poses design and development standards, land use allowances, and development permits to help mitigate and protect again impacts on these areas. Relevant provisions of the MMC adopted for the purpose of avoiding or mitigating an environmental effect to land use, aesthetics, or parks, recreation, and open space are summarized below. These include:

- **Title 12 MMC, Public Improvements.** Title 12 establishes standards related to the provision of sidewalks and implementation of complete streets principles.
- **Title 14 MMC, Floodplain Regulations.** Title 14 includes flood hazard area regulations and requires compliance with standards for floodproofing for structures sited in flood hazard areas.
- **Title 15 MMC, Buildings and Construction.** In addition to including the building code, which incorporates the Washington State Building Code, Title 15 also includes lighting standards and requirements.
- **Title 22 MMC, Unified Development Regulations.** Title 22 includes development regulations for various zoning districts and the design standards that accompany them.

City of Monroe Comprehensive Plan (2015). Monroe is fully planning under RCW 36.70A.040 and must complete a periodic review every 10 years for the comprehensive plan and development regulations, including those related to critical areas and natural resource lands. This periodic review is necessary for compliance with revisions to GMA and other related planning regulations, including the VISION 2050 MPPs and Snohomish County's CPPs. The current periodic update review process must be completed on or before December 31, 2024. Compliance is necessary to be eligible for grants and loans from certain state infrastructure programs managed by PSRC and various state agencies. The City's 2015 Comprehensive Plan provides policies to guide Monroe's future growth and development through the year 2035.

Lake Tye Park and Cadman Master Plans (2019). These park grand plans provide concept designs and cost estimates for two large undeveloped park sites in Monroe. Park programming recommendations were incorporated into the Parks, Recreation, and Open Space (PROS) Plan and will help protect allocated lands.

Skykomish-Snohomish Rivers Recreation Concept Plan (2018). This plan provides a framework for coordinating recreation management and informs related activities on the Skykomish and Snohomish Rivers across jurisdictions and can help to protect these unique shorelines.



Skykomish and Snohomish Rivers Wayfinding Signage Design Intent (2019). This project provides a countywide sign package with guidelines for use associated with recreation and tourism projects along and adjacent to the Skykomish and Snohomish Rivers.

Infill, Multifamily, and Mixed Use Design Standards (2011). Updated in 2021, these standards expand beyond municipal code to encourage and accommodate for infill.

Monroe Parks, Recreation, and Open Space (PROS) Plan (2022). The PROS Plan provides a detailed assessment of existing parks and recreation facilities and establishes goals and strategic actions to meet current and future needs. With new park and open space acquisitions proposed by the updated 2022 PROS Plan, almost all residents would reportedly live within a 10-minute walkshed of greenspace. This acquisition would also help the general LOS for community and neighborhood parks increase (as six parks and open space areas are included as park access opportunities in the updated plan).

3.1.3 Land Use

Monroe sits roughly 32 miles northeast of Seattle and 16 miles southeast of Everett, in southern Snohomish County. Neighboring cities include Sulton, Lake Stevens, Snohomish, and Duvall. According to the 2020 Decennial Census, the population of Monroe has grown to 19,699, an 11 percent increase since the last major Comprehensive Plan Update in 2015.

Monroe is situated at the foothills of the Cascade Mountain Range and is bordered by the Snohomish and Skykomish Rivers, making it a town with considerable access to nature. Other waterways include the Snoqualmie River, Lake Tye, and Lords Lake. The City also has an extensive trail network. More than 14 miles of trails serve bicyclists and pedestrians across the City, with plans for an extension into the regional trail network through the Centennial Trail and Snoqualmie Valley Trail.

The Monroe UGA includes approximately 6 square miles within the City corporate limits and approximately half of a square mile of land in unincorporated Snohomish County (2,090 square miles) (U.S. Census Bureau n.d.). Despite accounting for only 0.2 percent of the Snohomish County, Monroe is substantially more densely populated than the county, with nearly ten times the number of people per square mile.



Three main highways bisect the City and influence adjacent land uses: U.S. Route 2/Stevens Pass Highway (US 2), State Route 522 (SR 522), and State Route 203/Lewis Street (SR 203). Fryelands Boulevard, Main Street, Kelsey Street, Chain Lake Road, and Woods Creek Road provide access to visitors from the rest of the region. Transit services use US 2 to connect Monroe to Sultan, Everett, Snohomish, and Seattle.

The City of Monroe 2015 Future Land Use Map (**Figure 3-1**) is part of the Comprehensive Plan and expresses graphically the 20-year vision of preferred land use patterns to guide development in the City. The land use designations reflect a variety of future land use types and intensity of development. The 2015 Comprehensive Plan land use designations are implemented by a corresponding range of zoning districts and development regulations established in the Monroe Municipal Code. Forty-six percent of Monroe is currently designated for detached residential land uses, followed by educational, City-owned (e.g., parks), and other institutional lands.

COMPREHENSIVE PLAN LAND USE DESIGNATIONS

The following map identifies current Monroe land use designations under the 2015 Comprehensive Plan and the types of development allowed in each area of the City. The general land use categories are described below.

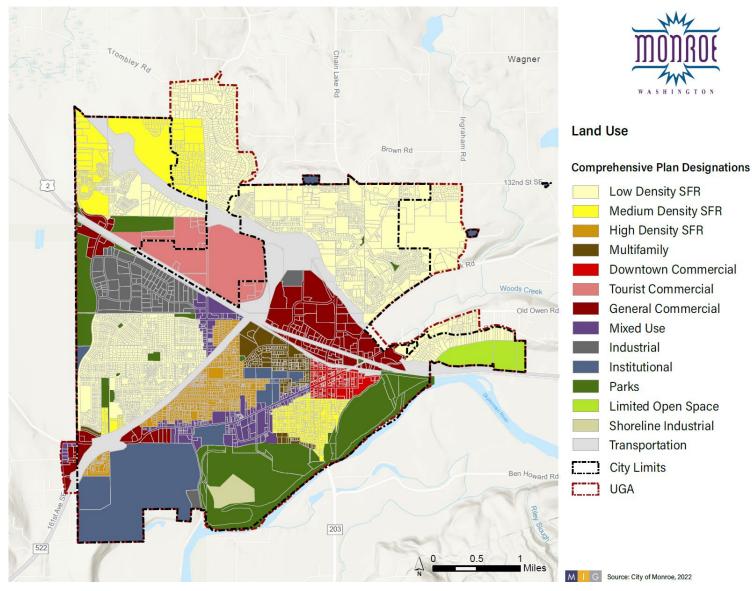
Low-Density Single-Family Residential (SFR)

Within the UGA, there are three types of detached housing designations: Low, Medium, and High-Density SFR. Low-Density SFR develops at an approximate gross density of three to five units per acre. Subdivisions in this designation may have individual lots ranging from about 9,000 square feet to 14,500 square feet, but individual lots may be smaller in more constrained areas.

Medium-Density Single-Family Residential

Medium-Density SFR areas can develop at a higher intensity, ranging from approximately five to seven units per acre. Where sites are unconstrained, this can result in individual lot sizes of about 6,000 square feet to 9,000 square feet. These areas are more typically located in the northwestern corner of the City or directly north of the Skykomish River or SR 522.





SOURCE: Prepared by MIG Inc. based on data provided by the City of Monroe

FIGURE 3-1 2015 Comprehensive Plan Land Use Designations



High-Density Single-Family Residential

High-Density SFR (generally east of SR 522, south of US 2, north of Main Street, and west of King Street) is intended to encourage redevelopment and bring large-scale transformation to an area. Development intensity is set at one unit for every 3,000 square feet of lot area, permitting higher density housing types, including attached housing like townhomes on parcels larger than 6,000 square feet. All SFR designations allow for parks, and most of the High-Density SFR can be found sandwiching SR 522, north and south of the highway.

Attached Residential

This designation provides for developments at densities between 12 and 25 dwelling units per acre. Generally, this designation is appropriate for land in proximity to principal arterials and to commercial centers. This designation is intended for areas of infill housing such as the Downtown and West Main Street corridor, and for senior housing and other special housing groups. Attached Residential is designated in areas south of the intersection of US 2 and SR 522.

General Commercial

This designation is characterized by retail, dining, entertainment, and businesses that are conducted primarily indoors. Commercial uses provide services or entertainment to consumers. Commercial uses may also include outdoor display and/or storage of merchandise and tend to generate noise as a part of their operations. Such uses include but are not limited to shopping centers, large retailers, grocery stores, retail sales, food and drink establishments, recreational vehicle sales or rental, and other related uses. Most general commercial spaces can be found at the edges of the UGA; on the western border and north of the historic Downtown, north of US 2.

Downtown Commercial

The Downtown Commercial designation is comprised of retail and service businesses that cater primarily to pedestrians. Mixed uses can occur within a single building or as multiple, individual structures on the same property.

Tourist Commercial

The Tourist Commercial designation anticipates a new generation of planning and development in the vicinity of the airport and Evergreen State Fairgrounds. It allows visitor accommodations,



events, additional commercial development, and permits business park or related development that may eventually replace the airport.

Mixed Use

The Mixed Use designation is characterized by a diverse mix of land uses; where there is the ability to develop land efficiently through the consolidation and infill of under-utilized parcels; and where infrastructure, transit, and other public services are available or easily provided. Mixed Use encourages office, retail, and light-industrial uses; compatible high-technology manufacturing; institutional and educational facilities; public and private parks and other public gathering places; entertainment and cultural uses; and attached residential units. The Mixed Use zone in the City of Monroe allows 8–12 dwelling units per acre.

Industrial

This designation applies to both light and general industrial uses and may include small-scale ancillary commercial uses. Light industrial includes non-polluting manufacturing and processing, wholesaling, warehousing and distribution, and other similar activities, which tend to require large buildings and generate more large-truck traffic than other types of land uses. General Industrial applies to more intensive manufacturing and processing operations. However, all industrial uses must meet the performance standards in the zoning ordinance to prevent undue and adverse environmental impacts. Industrial areas are mainly close to the Fryelands (a neighborhood of detached homes, a community park and trail system, and public schools), south of US 2.

Shoreline Industrial

This specific Shoreline Industrial designation refers only to the property hosting the existing Cadman Sky River Pit. It permits the processing of rock and acknowledges the continuation of the processing operations, even as the mining portion of the operation phases into reclamation.

Institutional

This designation includes county, state, or federally owned and operated facilities located within City limits or the UGA. These include the Washington State Reformatory (Monroe Correctional Complex), Public Library, and the Evergreen State Fairgrounds, all of which have regional uses and are located on large sites.



Parks

This designation includes public neighborhood, community and regional parks, recreational facilities, and natural open spaces preserved through acquisition by the City (or other public entity), transfer of development rights, dedication, or other mechanism. This designation includes Al Borlin, Lewis Street, and Lake Tye parks. Private parks are not included in this designation. Existing parks, recreation, and open space facilities are described further in this chapter under Section 3.1.5.

Limited Open Space

Slightly different than the parks designation, the Limited Open Space designation is appropriate for very low-intensity development because it may lack availability of public services and be constrained by critical areas. Limited Open Space areas can be suitable for buffers between development types or as low-intensity land use along the edge of the UGA. Limited Open Space areas can also provide for enhanced recreational facilities and linkages between trail networks.

Transportation

The Transportation designation is applied to large landholdings dedicated to regional transportation purposes. This includes the US 2 corridor, the SR 522 corridor, the railroad corridor, and the land owned by the Washington State Department of Transportation (WSDOT) for the future US 2 bypass.³ It does not include City-owned right-of-way.

ZONING DISTRICTS AND DEVELOPMENT PATTERNS

The 2015 Comprehensive Plan land use designations are implemented by a corresponding range of zoning districts and development regulations established in Title 22 MMC. Zoning classifies, designates, and regulates the development of land in Monroe. Monroe's Zoning Map, most recently updated in 2022, identifies several primary zoning designations: Single-Family (Detached) Residential; Multi-Family (Attached) Residential; Mixed Use; Commercial; Industrial; Institutional; Transportation; Parks; and Limited Open Space (**Figure 3-2**).

³ This is a three-phase project that was started in the 1960s to mitigate traffic overflow from population growth. It moves the SR 522 and US 2 interchange approximately 1.15 miles farther north of the city, to connect with Chain Lake Road. This project is part of the WSDOT 2007–2026 20-year State Highway System Plan (Washington State Legislature, *Monroe Bypass Summary*, 2011. MonroeBypassSummary.pdf [wa.gov]).



The City's largest zoning district is detached residential, accounting for 46 percent of the land in Monroe. Most of the lowest-density, detached zoning is located in the northeastern corner and the western border of the City limits. The northwest corner and area along SR 522 allow for increased densities of detached residential uses. The next largest zoning districts encompass parks and open space (Limited Open Space and Parks) and public facilities like schools and rights of way (Institutional and Transportation). Industrial and commercial zoning rank third and fourth, but account for a significantly smaller share of the land use. The largest commercial spaces are located on both sides of US 2. The Fryelands industrial area contains most of the industrial land and development within the City.

In areas located south of US 2, land use patterns typically follow a grid-like pattern of streets, focused on the Downtown corridor as its central location. There is limited development along the shorelines of the Skykomish River due to floodplains and the location of parks and natural areas.

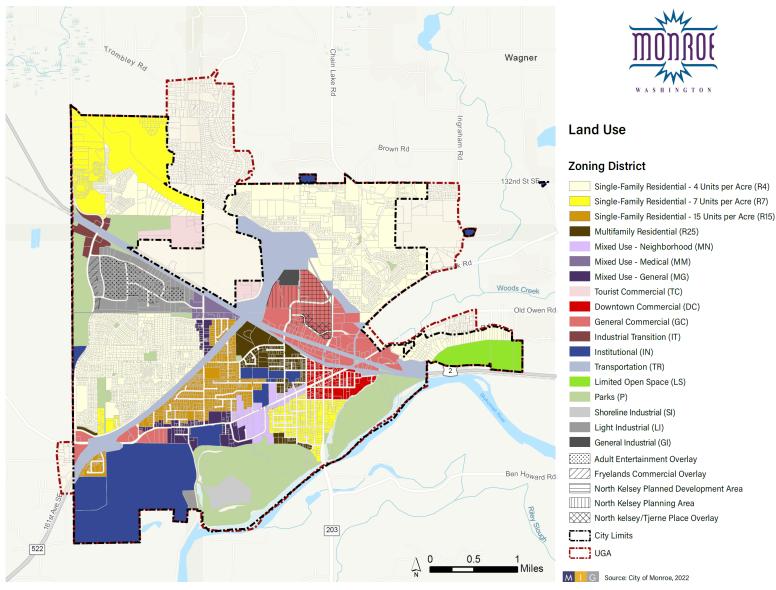
Overlays

Several main development overlays in the City also determine development patterns: the North Kelsey/Tjerne Place Overlay District (NK/TP-O) and the Fryelands Commercial Overlay District (FC-O). The NK/TP-O is a commercial overlay that allows for expansion of commercial and residential uses in this traditional and well-established commercial zone. The FC-O designation allows certain commercial development in the Light Industrial zoning district.

URBAN CENTERS

The City of Monroe has identified two areas within the City as locally adopted urban centers. Downtown Monroe and the North Kelsey Subarea were identified locally as urban centers by the Monroe City Council in 2009 and 2003 (later amended in 2018). Downtown was designated as an urban center for increased residential development, including affordable housing. The North Kelsey Subarea was originally master planned by the City to support retail and office space, but regulations were later amended in 2018 to provide for a combination of horizontal and vertical mixed-use, attached housing, retail space, and a public village green in the plan area. While these areas are identified for concentrated growth within Monroe, they are not currently identified as regional growth centers by PSRC or Snohomish County.





SOURCE: Prepared by MIG Inc. based on data provided by the City of Monroe

FIGURE 3-2 Existing Zoning Districts



3.1.4 Aesthetics

This section describes the overall visual design and character of Monroe's existing urban environment. Aesthetics also refers to the heights and design of structures. The City's Municipal Code includes design and development standards that regulate development (Title 22 MMC). These standards lay out the physical character of the area and its immediate surroundings.

VISUAL CHARACTER

Monroe has several areas with notable visual features and neighborhood purpose, including the historic Downtown Monroe (**Figure 3-3**), North Kelsey Commercial Area (**Figure 3-4**), the Evergreen State Fairgrounds (**Figure 3-5**), and the Monroe riverfront (**Figure 3-6**).



Photo provided by the City of Monroe

FIGURE 3-3 Downtown Monroe

The historic *Downtown* serves as the City's focal point. Starting at the intersection of Old Owen Road and US 2, Downtown transitions from a busy intersection with general commercial spaces into a commercial area catered to pedestrians, with an active street environment. The buildings are historic in nature and tend to be low-density mixed use developments that are typically no higher than two stories. Restaurants, coffee shops, and local businesses line West Main Street until Madison Street, where development transitions into more mixed use, attached housing, and high-density developments.





Photo provided by the City of Monroe

FIGURE 3-4 North Kelsey Commercial Area



Photo provided by the City of Monroe

FIGURE 3-5 Evergreen State Fairgrounds

Much of the development adjacent to US 2 is focused on largeformat retail and auto-oriented commercial development. An example of this aesthetic is the North Kelsey Commercial Area, characterized by auto-oriented commercial spaces with large retail stores, healthcare facilities, fast-food and super centers, and large surface parking lots.

The Evergreen State Fairgrounds, recently renamed Fair Park, hosts the Washington State Fair, and is characterized by expansive, open fields and buildings.





Photo provided by the City of Monroe

FIGURE 3-6 Monroe Riverfront

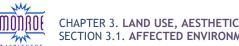
Riverfront areas along the Skykomish River in Monroe are typically natural or designated as open space. These areas generally restrict development due to flooding potential.

Other locations within Monroe are typically contemporary detached residential subdivisions with limited architectural differences. Some older neighborhoods near Downtown and south of Main Street are characterized by gridded streets and smaller bungalows, intermixed with infill residential development.

BUILDING HEIGHT, BULK, AND SCALE

Building height, bulk, and scale vary depending on location. While building heights in the historic Downtown can reach up to five stories for mixed use buildings, they typically do not reach higher than two stories.

Density and lot coverage increase in the northwestern portion of the City. Directly to the east of Lake Tye are large industrial buildings that are no taller than three stories, but can cover up to 100 percent of their lot, leading to low and wide buildings and parking lots to support warehouse, wholesale, and distribution workers and freight. The Monroe Center shopping mall is equally broad in its structures, catering to visitors and residents who are more auto-centered, and ultimately promoting higher-density buildings in mixed use areas. The stated purpose of the development standards is to keep structures in adjacent zones similar in height and scale, while creating more walkable and connected neighborhoods where appropriate (**Table 3-1**).



CHAPTER 3. LAND USE, AESTHETICS, AND PARKS, RECREATION, AND OPEN SPACE SECTION 3.1. AFFECTED ENVIRONMENT

TABLE 3-1 Bulk and Density Standards by Zone

Zone	Density	Maximum Height (Feet)	Maximum Coverage
(Single Family) Detached Housing Zoning (R4)	4 du/acre	35	50%
(Single Family) Detached Housing Zoning (R7)	7 du/acre	35	50%
(Single Family) Detached Housing Zoning (R15)	15 du/acre	35	50%
Attached Housing Zoning (R25)	12–25 du/acre	35-45	70-80%
Mixed Use Zoning (MG, MM, or MN)	8–12 du/acre	35-45	70-100%
Downtown Commercial Residential	11 du/acre	35	_
Downtown Commercial Historic Main	20 du/acre	55 (for mixed use)	_
Downtown Commercial East Downtown Neighborhood	20–28 du/acre	55 (for mixed use)	_
Downtown Commercial Downtown Promenade	_	55 (for mixed use)	_
Commercial (GC)	—	45	100%
Commercial (NK/TP-O)	26 du/acre	65 feet residential (45 other)	100%
Industrial (LI/FC-O)	-	35	100%
Industrial (SI/GI)	_	45	100%

SOURCE: Title 22 MMC NOTE: du = dwelling unit

PEDESTRIAN ENVIRONMENT

Pedestrian-oriented development and spaces are required to comply with the City's Infill, Multifamily, and Mixed-Use Design Standards (City of Monroe 2021), which include design criteria for pedestrianoriented spaces (e.g., wider sidewalks, pedestrian access to buildings from the street, pedestrian-scale lighting, seating areas, and landscaping).

In the historic Downtown, sidewalks are wide and covered by store awnings, are landscaped, and offer ample lighting. Outside of this center and in the eastern portion of the City, sidewalks become narrow, with no seating, limited lighting, and limited availability. There are narrow sidewalks and auto-centered conditions near the large shopping center in northwest Monroe along US 2, which is indicative of that type of commercial zoning.

Residential areas generally have sidewalks, although some areas in the central portion of Monroe lack pedestrian amenities. The



pedestrian environment is also varied by location, with some areas having street trees, while others only have a sidewalk.

SCENIC VIEWS

Situated amongst the Cascade Mountains and between the Skokomish, Snohomish, and Snoqualmie Rivers, Monroe is host to many scenic views and scenic view corridors. Depending on the location, there are views of the Snoqualmie River Valley, Cascade Mountains, and Mount Rainier.

In the southern portion of the City, the Monroe Correctional Complex and Monroe High School have views of these surroundings, as they are higher in elevation than their surrounding developments. This is also the case for detached housing developments along Old Owen Road on the east side of the City and Woodlands/Roosevelt Ridge in North Monroe. The rest of Monroe is relatively flat, although views of the Cascades are often still possible, depending on tree canopy.

3.1.5 Parks, Recreation, and Open Space

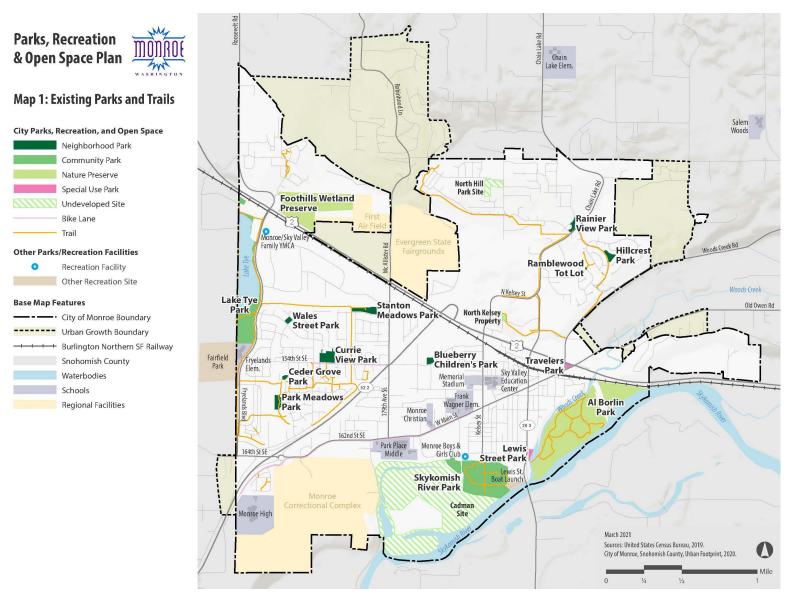
Within the Monroe City limits, approximately 288 acres of park land is distributed amongst 17 sites (**Figure 3-7**). Fifteen of these parks (282 acres) are developed, providing places to play, gather, and experience the outdoors. Two sites (6 acres) are undeveloped, holding acreage in reserve for future park use. These open spaces range in size and function, from community parks to nature preserves to river greenbelts. Currently, community parks and river greenbelts occupy the most acreage in the City's inventory (at 114 and 105 acres, respectively) (**Table 3-2**).

The parkland acreage includes 14 sports fields and seven courts, 12 playgrounds, picnic shelters, and specialized facilities like dog parks and skate parks.

Monroe's trail system includes more than 14 miles of trails. Aside from the Al Borlin Park Pedestrian Trail and some of the Park Meadows Trail, most trails are surfaced with asphalt and serve as multi-purpose, accessible trails that support recreation and active transportation. These parks provide shoreline access and serve as connectors to other parts of the City.

In 2015, the existing Park LOS was 4.75 acres per 1,000 residents, which jumped to 16.6 acres per 1,000 residents in 2020. Assuming all parks are developed by 2035, the 2022 PROS Plan proposed an LOS of 20.6 acres per 1,000 residents (City of Monroe 2022).





SOURCE: City of Monroe 2022

FIGURE 3-7 Existing Parks and Trails in Monroe



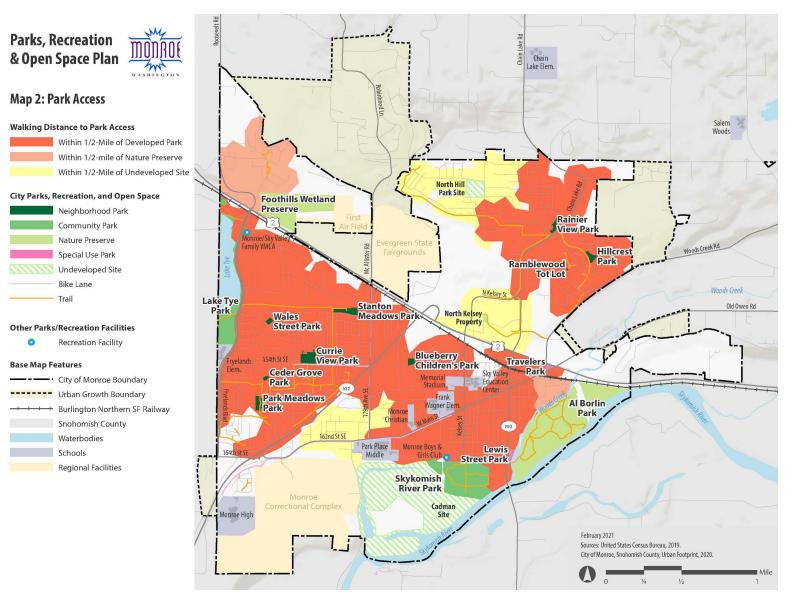
TABLE 3-2 City Park Lands by Classification

Park Type	Acreage	Examples
Community Parks	114.3	Lake Tye and Skykomish River Parks
Neighborhood Parks	15.0	Currie View, Rainier View, and Wales Street Parks
Special Uses Sites	0.6	Travelers Park
Nature Preserves	46.7	Foothills Wetland Preserve
River Greenbelts	105.1	Al Borlin and Lewis Street Parks
Undeveloped Park Sites	6.0	North Hill Park Site and North Kelsey Property
Total	287.7	

SOURCE: City of Monroe 2022

When developing the City of Monroe Parks, Recreation, and Open Space (PROS) Plan update in 2022, an Existing Parks and Trails Assessment revealed several significant gaps for access to parks and open space within the City's north and east UGA. At the time of annexation, these areas will not meet the current citywide goal of park or open space access within ½ mile of all residents (**Figure 3-8**).





SOURCE: City of Monroe 2022

FIGURE 3-8 Park Access in Monroe

3.2 Potential Impacts

This section describes the potential impacts of the City's future growth and development on land use, aesthetics, and parks, recreation, and open space.

3.2.1 Impact Assessment Methodology and Thresholds of Significance

No new development is authorized by this non-project SEIS as further actions would be required to implement the Proposed Action. Therefore, this SEIS identifies the possible environmental impacts on land use, aesthetics, and parks, recreation, and open space that could occur as a result of reasonably foreseeable future actions that would implement the goals, policies, and actions of the 2024 Comprehensive Plan Update. Impacts may also result from the construction and operation of an additional 2,629 housing units and 2,359 jobs by 2044. (These are the housing and jobs allocations for 2044 for the Monroe UGA identified in the Snohomish CPPs.) The analysis that follows evaluates the significance of impacts that the alternatives could have on the environment. Alternatives are based on the availability of vacant, partially used, and redevelopable lands identified in the Snohomish County Buildable Lands Report. The project team utilized the Urban Footprint planning tool, which employs diverse types and intensities of development, to simulate the No Action Alternative and Proposed Action.

The type, magnitude, and likelihood of impacts were evaluated in relation to existing land use patterns, comprehensive plan designations, and zoning; aesthetic conditions; and parks, recreation, and open space. Thresholds of significance include:

- **Land Use:** The alternative would result in inconsistencies with current land use plans, policies, or regulations of an agency with jurisdiction.
- **Aesthetics:** The alternative would introduce new development types inconsistent with existing City design requirements or guidelines, obstruct or alter one or more scenic viewshed in the study area, or create a new source of substantial light or glare.
- Parks, Recreation, and Open Space: The alternative would increase the demand for parks, recreation, and open space services to the extent that the LOS (acres of park/recreation per person) could not be maintained, or LOS for walkability (providing open space within a 10-minute walk or within a ¹/₂mile travel distance) would not be achieved.



3.2.2 Impacts Common to Both Alternatives

Table 3-3 summarizes the expected growth for the No Action Alternative and the Proposed Action. The Snohomish CCPs identify growth allocations of 2,629 housing units and 2,359 jobs in the Monroe UGA in order to meet 2044 expected population growth (2,216 housing units and 2,324 jobs within the City limits).

TABLE 3-3 Citywide Housing and Jobs Capacities under the No Action Alternative and Proposed Action

	Туре	2020 Census	2044 Snohomish Countywide Planning Policies, Allocations	Net Capacity Needed	No Action Alternative	Proposed Action
	Housina	6,163**	8,379	2,216	975*	2,471*
		-,		-,		_,
	Jobs	10,096**	12,420	2,324	2,330	2,741

SOURCE: Snohomish County 2044 Housing Growth Allocations (Table PE-3 and HO-2).

* The City of Monroe is responsible for meeting housing unit allocations within the Monroe City limits. These numbers do not include pending and permitted projects, which roughly total 1,000 units.

** U.S. Census numbers for housing units are based on 2020 estimates (excluding seasonal units). U.S. Census numbers for jobs are based on 2019 estimates.

Regardless of the alternative chosen, the housing supply and employment opportunities would increase through the development of existing vacant land or through redevelopment of parcels with the existing City limits.

Both the No Action Alternative and Proposed Action meet GMA land use planning goals by encouraging development on vacant, partially developed, underdeveloped, or redevelopable parcels, as opposed to expanding the existing City limits or UGA (RCW 36.70A.020(1) and (2)). This encourages urban development and reduces the risk of urban sprawl.

Under both alternatives, changes in urban form, an increase in building height and bulk, and an increase in development intensity is expected to occur over time. Existing standards and policies



would continue to apply to the siting, massing, design, and orientation of new development. Chapter 15.15 MMC contains standards for exterior lighting of buildings and parking lots.

The actual pace and distribution of future growth would be influenced in part by the implementation of the 2024 Comprehensive Plan Update policies, regulations, and actions. Future housing and employment growth would be reviewed for adherence to the applicable development regulations and applicable functional plans (e.g., PROS Plan). Additionally, planning processes that currently consider and mitigate impacts on land use, aesthetics, and parks, recreation, and open space (such as capital facilities planning, biennial budgeting, and operational planning) would continue under either alternative.

Both alternatives could affect viewsheds because both assume some level of housing and employment development, and with that increased building mass and height, compared to existing conditions. While no specific public viewsheds in Monroe are explicitly protected, Chapter 22.78 MMC (SEPA) establishes a framework for identifying, analyzing, and if necessary, mitigating environmental impacts associated with non-exempt development projects and adopting regulations and plans. Views are a consideration in this review process.

Both alternatives could increase light and glare as development is added and more building lighting and vehicle lights are present. This is particularly true for the Proposed Action, which would add the most capacity for growth. However, existing standards in the Monroe Municipal Code regulate exterior lighting, and it is unlikely these increases would result in a significant adverse impact.

As population increases in Monroe from new development, demand for parks, recreation, and open space would increase. Under both alternatives, parks and trails in Monroe would serve more people than they currently serve. The 2022 PROS Plan has identified a general park access goal of 20.6 acres per 1,000 residents for all park types collectively (Goal 4.2(d)) (City of Monroe 2022). In addition, Goal 4.3(a) of the 2022 PROS Plan specifies that "neighborhood parks at a level of service of 1.4 acres per 1,000 residents and community parks at a level of service of 5.2 acres per 1,000 residents."

If all parks identified in the 2022 PROS Plan are developed, the City would reach its goal of 20.6 acres per 1,000 residents under its current LOS guidelines, assuming a UGA population of 22,652. While the 2022 PROS Plan population assumptions are lower than those



assumed by the county (26,670 people by 2044) in its growth allocations, the City continues to acquire additional land to meet or exceed its LOS goals. The PROS Plan is also required by state law to be updated every 6 years. In 2028, the City will reassess its PROS Plan, LOS standards, and parks inventory together with the County's 2044 population estimates assumed through the Comprehensive Plan Update process.

As shown in **Table 3-4**, Monroe currently has a deficit for both neighborhood and community parks, and future deficits would continue to occur under both the No Action Alternative and Proposed Action. Assuming the higher 2044 county growth allocations and implementation of the 2022 PROS Plan, the City would nearly meet its LOS standards, with a deficit of less than 1 acre. As noted above, the 2022 PROS Plan will be updated to incorporate adopted growth allocations as part of its required 6-year update cycle. Therefore, impacts on parks would be **less-than-significant**.

Turk Acreage, 2020 and 2011					
Park Type	Existing Acreage*	Current LOS	LOS Goal	Additional Park Sites and Acquisitions	2044 LOS*
Neighborhood Parks	5.0	0.9	1.38	North Hill (8.3 acres) UGA Site A and Site B (8 acres)	1.17
Community Parks	14.3	6.6	5.15	2.6 acres adjacent to Lake Tye	4.38

TABLE 3-4Current and Future LOS Based on Projected
Park Acreage, 2020 and 2044

SOURCE: City of Monroe 2022

* 2044 LOS is determined using 2020 existing park acreage plus additional park sites and acquisitions through 2035. The population number used to calculate the 2044 LOS is the population determined by anticipated 2044 population growth.

According to the updated PROS Plan (2022), industry standards recommended by the National Recreation and Park Association (NRPA) and Trust for Public Land (TPL) suggest providing parks within a 10-minute walk (1/2-mile travel distance) of all residents to maximize park use and associated benefits. Parks and open space acquisitions identified in the 2022 PROS Plan would provide most residents with a park or open space within a 10-minute walk, including areas where additional growth is assumed.



3.2.3 Impacts of the No Action Alternative

This section describes the impacts of the No Action Alternative.

LAND USE

Land Use Planning

According to the Snohomish CCPs, the City of Monroe is projected to grow to 24,302 people by 2044. This means that 2,216 housing units and 2,324 jobs are needed to accommodate the growth of the community.

With the No Action Alternative, the City of Monroe would not meet housing unit allocations with its current City limits (although it would meet jobs allocations within City limits), nor would it meet housing or jobs allocations within the UGA. Therefore, it would not meet the established CPPs and would be inconsistent with GMA. Additionally, the CPPs suggest that jurisdictions should reduce disparities by increasing opportunity and creating inclusive community planning (DP-38). By not intentionally planning to accommodate diverse income levels in housing, the No Action Alternative would not reduce disparities, and could potentially contribute to them. The lack of increased density also works against the goals of the CPPs and visions of connectivity for the City.

The No Action Alternative would also not fully align with the PSRC VISION 2050 strategy for jurisdictions in the four counties including Snohomish County. Goals in VISION 2050 include coordinating growth and development near transportation services to create vibrant, walkable, and affordable communities. With the focus of the No Action Alternative being on separate commercial and residential development (as opposed to mixed use spaces), it would not fully align with the Regional Growth Strategy set by VISION 2050.

The No Action Alternative would not fully meet the MPPs. VISION 2050 also outlines MPPs that establish guidance for achieving land use and park and open space goals, including the Development Patterns MPPs that outline ways to manage land use and growth through increasing diversity of housing types and promoting mixed use areas, creating walkable neighborhoods, and encouraging healthy communities through increased densities. The No Action Alternative's proposed development pattern does not entirely align with these MPPs. While the No Action Alternative does not encourage sprawl into rural areas, it would not maximize the



potential density to promote this vision. This would result in inconsistencies with current land use plans, policies, and regulations between Monroe and agencies with jurisdiction, a **significant impact** on land use planning.

Land Use Compatibility

In the No Action Alternative, Monroe would continue to build out its existing vacant and redevelopable land in accordance with the 2015 Comprehensive Plan, Comprehensive Plan Map (Future Land Use Map), and current zoning regulations. Unbuildable lands, such as critical areas and buffers, easements, rights-of-way, and capital facilities lands, are not assumed to develop and have been removed from the developable land calculations. With these land use designations and considerations for critical areas, **less-thansignificant impacts** would be introduced to critical areas or other locations where development is not appropriate or permitted.

AESTHETICS

Visual Character

The No Action Alternative poses no conflict to residential or commercial design goals or standards. Although the No Action Alternative would not change City regulations or policies, it does anticipate that some parcels would be redeveloped to use the allowed building envelope more fully. Existing land uses would remain consistent with expected growth. Mass and scale would continue to be consistent with existing building types allowed within Monroe. Existing standards and policies would continue to apply to the siting, massing, design, and orientation of new development. Growth under the No Action Alternative would result in **less-thansignificant impacts** on visual character.

Scenic Viewsheds

The No Action Alternative would permit some taller structures, such as in Downtown, but would not change permitted land uses or design requirements adopted through the existing Development Code. While there would be some risk of obstruction of private views for residential areas that are in the perimeter of these structures due to this change in height, the No Action Alternative would not increase the potential for visual impacts on scenic viewsheds as there would be no changes to existing development regulations, which already permit taller buildings in some part of Monroe. Impacts on scenic viewsheds would be **less-than-significant**.



Light and Glare

Additional building development and automotive-focused infrastructure pose the risk of increased illumination from cars, transportation infrastructure, external building illumination, new street lighting, and safety features. This would contribute to overall lighting in the area, which could affect residential neighbors. However, Chapter 15.15 MMC contains standards for exterior lighting of buildings and parking lots. This code section includes requirements for shielding to prevent glare, elimination of unneeded lighting, and limits on wattage to minimize light and glare effects, including potential for nuisance lighting. The No Action Alternative assumes compliance with these standards, which would ensure that impacts related to light and glare from future development would be less-than-significant.

PARKS, RECREATION, AND OPEN SPACE

Level of Service

Under the No Action Alternative, Monroe parks and trails are expected to serve over 4,600 more people than they do currently by 2044. To meet current required levels of service for neighborhood and community parks in the City, additional park land would need to be acquired and developed. By acquiring the additional park access opportunities identified in the 2022 PROS Plan, this impact could be decreased to **less-than-significant**.

3.2.4 Impacts of the Proposed Action

This section describes the impacts of the Proposed Action.

LAND USE

Land Use Planning

The Proposed Action would meet Snohomish County CPPs and GMA requirements by exceeding 2044 citywide housing allocations by 255 units and employment capacity by 417 jobs. The Proposed Action would extend the Comprehensive Plan planning horizon to maintain at least a 20-year horizon (to 2044), consistent with GMA requirements.

The Proposed Action would also align with the VISION 2050 strategy. VISION 2050 focuses on coordinating growth and development near transportation services to create vibrant, walkable, and affordable communities. The Proposed Action is



focused more heavily on higher density and middle housing development north of US 2 and increasing job capacity along Main Street and near North Kelsey Street. This aligns with the Regional Growth Strategy set by VISION 2050.

The Proposed Action would also meet the MPPs. The MPPs set the guidance for achieving land use and park and open space development patterns and outline ways to manage land use and growth through increasing diversity of housing types and promoting mixed use areas, creating walkable neighborhoods, and encouraging healthy communities through increased densities. While the Proposed Action accommodates GMA requirements, it may increase the intensity of development, which would also increase connectivity between neighborhoods and communities, offering higher densities and services in proximity to affordable housing.

Proposed development under the Proposed Action would align with these MPPs, as it encourages building up instead of out to meet community needs. **No impact** to land use planning related to GMA, VISION 2050 Strategy, MPPs, or CPPs is expected under the Proposed Action.

Land Use Compatibility

The Proposed Action assumes a number of land use changes, including rezoning the R4 zone to R7, allowing for greater residential densities and a variety of housing types like duplexes, triplexes, and quadplexes or townhomes. These types of housing are still subject to current setbacks, height limits, and lot coverage maximums, and other design standards applicable to the detached residential zones. Changes in land use are summarized in **Table 3-5**.

The Proposed Action also intensifies the existing mixed use zoning with more commercial and high-density residential areas along Main Street, North Kelsey Street, Chain Lake Road, and in current commercial areas east of the SR 522/US 2 interchange. Several parcels already designated as Mixed Use zones would be divided into two new zones: Mixed Use Neighborhood and Mixed Use General. The Mixed Use General would allow for more job and residential opportunities and spaces (at 20 dwelling units/acre or 15 jobs per acre). The Mixed Use Neighborhood (at 12 dwelling units/acre and 12 jobs per acre) would balance the intensity of development in the historic Downtown and along SR 522.

TABLE 3-5 Changes in Land Use

	No Action A	Iternative	Proposed Action	
	Acre	Percent	Acre	Percent
SF Residential	1,819.68	46.0%	1,782.62	45.1%
MF Residential	92.25	2.3%	87.86	2.2%
Commercial	345.80	8.7%	321.12	8.1%
Mixed Use	167.34	4.2%	233.47	5.9%
Industrial	193.02	4.9%	193.02	4.9%
Other	1,335.19	33.8%	1,335.19	33.8%
Total	3,953.30		3,953.30	

SOURCE: Prepared by MIG

Areas that would experience the most change would be (1) residential areas in Mixed Use zones, (2) detached housing zones, and (3) commercial zones. The Proposed Action proposes additions of Mixed Use zoning to previous detached residential zones along 179th Avenue (running north to south near the SR 522 and US 2 interchange), on Chain Lake Road, and along 154th Street Southeast. East of North Kelsey Street and along West Main Street, attached housing areas and Commercial spaces will transition into Mixed Use zones as well (**Table 3-5**).

The Proposed Action would also redesignate some General Commercial areas near Downtown to allow more density as a Downtown Commercial zone (24 dwelling units/acre or 39 employees/acre) versus the General Commercial zone, which allows for less than half of the employment at only 15 employees/acre. Newly designated Downtown Commercial parcels would not affect the existing urban form of the historic Downtown area.

Future development under the land use designations in the Proposed Action would result in new land uses located in proximity to existing land uses. Parcels rezoned under the Proposed Action are already intended to be developed. Additional land would not be required to meet the City's growth allocations. Projected growth has the potential to create compatibility issues with existing lower density residential, small-scale commercial, or open space uses, particularly during the transition from semi-developed, suburban residential uses to mixed uses, which is an adverse impact. With greater housing densities allowed, there may be localized impacts in neighborhoods transitioning from more suburban to urban densities that include more closely spaced and a greater variety of



housing types, such as duplexes, triplexes, townhouses, stacked flats, and garden apartments. Growth within Monroe may also result in limited compatibility conflicts with rural uses on the other side of the UGA boundary. However, these potential impacts would continue to be addressed through compliance with existing development regulations, resulting in a **less-than-significant impact** on land use compatibility.

AESTHETICS

Visual Character

The Proposed Action would not conflict with residential or commercial design goals or standards related to urban form. The Proposed Action would change regulations and policies, allowing more density citywide and taller buildings in some areas. These changes could result in some existing viewsheds being obstructed.

Land uses and designations would change to incorporate infill development by increasing the amount of middle housing and mixed use land compared to the No Action Alternative. However, as the same policies and design standards apply to all mixed use development (i.e., contiguous building, consistency with mass and scale, and low-impact development, like water-permeable pavers), there would be no significant adverse impacts that cannot be avoided. Existing standards and policies would continue to apply to the siting, massing, design, and orientation of new development that would result in a **less-than-significant impact** on visual character under the Proposed Action.

Scenic Viewsheds

The Proposed Action would not substantially obstruct or alter scenic viewsheds in Monroe. Future development of multiple story buildings is generally assumed along main corridors in the City (US 2, SR 522, and Main Street). Taller or higher density development is already permitted in these areas under existing land use and zoning standards.

In flat locations, like the detached residential zones in the northeast quadrant of the City, potential changes in zoning could obstruct public views of surrounding scenic resources, but new or infill development is not assumed to be taller than what is permitted for existing detached housing development (typically limited to 35 feet in height). Tree canopies and other existing vegetation would also be more likely to obscure views than development in detached housing neighborhoods.



Any new development under the Proposed Action would still be subject to the same maximum height restrictions as identified in the current Development Code. There would be a **less-thansignificant impact** on the scenic viewsheds under the Proposed Action.

Light and Glare

Compared to the No Action Alternative, the increase in housing units and employment from mixed use development could increase light and glare. However, Chapter 15.15 MMC contains standards for exterior lighting of buildings and parking lots. This code section includes requirements for shielding to prevent glare, elimination of unneeded lighting, and limits on wattage that minimize light and glare effects, including the potential for nuisance lighting. The Proposed Action's compliance with these standards would ensure that impacts related to light and glare from future development would be **less-than-significant**.

PARKS, RECREATION, AND OPEN SPACE

Level of Service

Under the Proposed Action, parks and trails in Monroe are expected to serve nearly 7,000 more people by 2044 than they currently serve. The City currently has an LOS deficit for both neighborhood and community parks. The 2022 PROS Plan addresses the majority of the LOS deficit, even with the assumed increased growth. Additionally, the ability to meet standards such as accessibility of parks and open space within a 10-minute walk would generally not be affected because the majority of growth would occur in areas already served by or areas that will be served by park and open space, as assumed in the 2022 PROS Plan. The 2022 PROS Plan will be updated every 6 years as required by state law. Impacts associated with parks and open space would be **less-thansignificant**.

3.2.5 Summary of Impacts

Both alternatives have potential impacts on land use, aesthetics, and parks, recreation, and open space. Many, if not all, of these impacts can be minimized, avoided, or mitigated through policies and supportive strategies.

The No Action Alternative would result in significant impacts on land use planning and parks, recreation, and open space. The lack of increased density would work against the CPPs and visions of



connectivity. The proposed development pattern would not entirely align with the MPPs.

Under the No Action Alternative, less-than-significant impacts on land use compatibility, aesthetics, and parks, recreation, and open space may occur. The No Action Alternative would allow some parcels to be redeveloped to use the allowed building envelope more fully based on existing standards that would continue to apply to siting, massing, design, and orientation of new development, resulting in a less-than-significant impact on visual character. Some risk of view obstruction would occur in certain areas of Monroe due to changes in heights of structures allowed by existing development regulations, resulting in a less-than-significant impacts on scenic viewsheds. Development consistent with the No Action Alternative would comply with Chapter 15.15 MMC standards for exterior lighting of buildings and parking lots, which would ensure that increases in light and glare from future development would be lessthan-significant.

The Proposed Action would align with VISION 2050, GMA requirements, the MPPs, and the CPPs, resulting in no impact to land use planning. Although future development could result in higher housing densities and more varied land uses near each other, housing types, closely spaced housing, and urban uses bordering the UGA boundary, development would comply with existing development regulations, resulting in a less-than-significant impact on land use compatibility. Existing standards would continue to apply to new development siting, massing, design, and orientation, resulting in a less-than-significant impact on visual character. Changes to views resulting from taller buildings in some areas of Monroe and increases in light and glare would be possible but limited due to maximum height restrictions and standards for exterior lighting of buildings and parking lots, resulting in a lessthan-significant impact on scenic viewsheds and light and glare under the Proposed Action.

The Proposed Action would have a less-than-significant impact on parks, recreation, and open space.



3.3 Avoidance, Minimization, and Mitigation Measures

Mitigation to address the expected significant impact on parks, recreation, and open space under both alternatives include specific measures to address gaps or barriers to greenspace set forth in the updated PROS Plan (2022). The City will use the 2024 Comprehensive Plan Update and the PROS Plan to identify and accommodate gaps in service. The City would rely on future updates to the PROS Plan and funding to accommodate the need for increased parks, recreation, and open space under both alternatives. Washington's Recreation and Conservation Office (RCO) requires that park master plans include a 6-year capital improvement plan to identify short-term projects for implementation. To continue to be eligible for grant funding and comply with GMA and RCO requirements, the City of Monroe plans to regularly update the PROS Plan at least every 6 years. These updates would address ongoing gaps and opportunities in park access and parkland acquisition and development.

With the exception of a significant impact on land use under the No Action Alternative, no unavoidable, significant adverse impacts on land use and aesthetics are expected under either the No Action Alternative or the Proposed Action. No avoidance, minimization, or mitigation measures are recommended. Development under either alternative would be guided by existing regulations and policies that minimize potential impacts on land use, aesthetics, and parks, recreation, and open space (see Section 3.1.2).

3.4 Significant, Unavoidable Adverse Impacts

The No Action Alternative would result in a significant unavoidable adverse impact on current land use plans, policies, and regulations. No other significant unavoidable adverse impacts would result from the No Action Alternative. The Proposed Action would not result in unavoidable significant adverse impacts.

With the mitigation identified in Section 3.3, impacts on parks, recreation, and open space under both alternatives would be less-than-significant.