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1.0 INTRODUCTION

The Shoreline Management Act guidelines (Guidelines) require local shoreline master programs (SMPs) to regulate new development to achieve no net loss of ecological function. This No Net Loss (NNL) report summarizes supporting documentation developed during the Shoreline Master Program update process and details how this documentation provided a foundation for updating and developing the City’s SMP goals, policies, and regulations that will prevent future degradation of shoreline ecological functions over time relative to their existing condition. Supporting documentation includes the Shoreline Analysis and Characterization Report, the Shoreline Restoration Plan, and the Cumulative Impacts Analysis. The shoreline characterization provided documentation of existing conditions, allowed for the evaluation of the existing shoreline functions and values, and allowed for the identification of areas for future conservation and/or restoration of ecological functions, which provided a basis for development of the restoration plan. The cumulative impacts analysis (CIA) was then developed in conjunction with the SMP update, incorporating information from the shoreline analysis report, the restoration plan, and the policies and regulations developed in the SMP update process to determine the potential and/or extent of cumulative impacts from foreseeable future development in the shoreline environment.

2.0 LONGVIEW SHORELINES

The shorelines within the City of Longview consist of four distinct shoreline areas: the Columbia River, the Cowlitz River, Lake Sacajawea, and the Long Bell Log Pond. The Columbia River and Cowlitz River shorelines are broken into several separate reaches in order to most accurately characterize the shorelines. The shorelines of Lake Sacajawea and the Long Bell Log Pond are considered to contain one continuous reach. The Long Bell Log Pond reach consists only of approximately 8 percent (0.25 miles) of the entire shoreline of the log pond, the majority of which is located outside of City limits, in Cowlitz County jurisdiction. The Columbia and Cowlitz Rivers are also classified as Shorelines of Statewide Significance per RCW 90.58.020. A description of each reach is provided in Table 1 below.

Table 1. Shoreline Reach Summaries.

<table>
<thead>
<tr>
<th>SHORELINE</th>
<th>DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reach 1: Columbia River</td>
<td>The shoreline area consists primarily of undeveloped land with one single-family home and dock at downstream end. Wetlands are mapped on along the shore of the reach, waterward of the levee system. The uplands and mapped wetlands landward of the levee are primarily used for agriculture. Just under half of the reach is well vegetated with dense stands of trees and shrubs covering the area from the shoreline to the toe of the levee. However, farther east, the shoreline transitions to sparse areas of shrubs and trees only along the immediate shore, transitioning to herbaceous species landward from the toe to the top of the levee. The entire levee structure (from toe of slope to toe of slope) itself is vegetated only with herbaceous species. The levee has disconnected the river from wetlands and the natural floodplain. Agricultural land use practices in this reach have limited the sources of wildlife food production, and recruitment and transport of LWM is limited to immediate shoreline due to levee.</td>
</tr>
<tr>
<td>SHORELINE</td>
<td>DESCRIPTION</td>
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<tr>
<td>-----------</td>
<td>-------------</td>
</tr>
<tr>
<td>Reach 2:</td>
<td>The majority of this reach is owned by the Port of Longview and operated as a marine terminal. The shoreline is encumbered with approximately 14 acres of overwater structures, such as docks and piers, associated with the marine terminals and a levee extends along the entire shoreline. In the areas without overwater structures, the shoreline has limited existing vegetation or large woody debris, and the existing river bank area is armored with large rock interspersed with a few shrubs before transitioning to a developed levee structure and access road. The remaining area covered by shoreline jurisdiction consists of impervious surfaces/structures such as storage lots and warehouse buildings. There are no mapped wetlands within this reach of the Columbia River. Modifications to the shoreline from the levee system, overwater structures, and shoreline armor have resulted in disconnection from the floodplain, wetlands, and woody vegetation is regularly removed.</td>
</tr>
<tr>
<td>Columbia River</td>
<td>Length: 0.90 miles</td>
</tr>
<tr>
<td>Reach 3:</td>
<td>Land use in the shoreline area is comprised of residential, park, commercial, and industrial uses. Shoreline modifications consist of a flood control levee system running parallel to the shoreline, and multiple boat ramps and docks. In several areas, residential, commercial, and industrial structures are located waterward of the levee system. This has greatly increased the amount of impervious surface within the shoreline areas, impacting floodplain and former wetland areas, and increasing stormwater runoff. Siltation following the 1980s eruption of Mount St. Helens has rendered the Cowlitz River channel along the reach mostly non-navigable by commercial ship traffic, which limits the movement of commerce from industrial use along the shoreline to land-based transportation methods. About half of the reach has been cleared of woody vegetation, with the remaining area consisting of a narrow band of deciduous trees and shrubs along the shore.</td>
</tr>
<tr>
<td>Cowlitz River</td>
<td>Length: 3.29 miles</td>
</tr>
<tr>
<td>Reach 4:</td>
<td>The reach is characterized by a narrow vegetated shoreline consisting of mature trees and shrubs, bordered by Westside Highway and the Columbia/Cowlitz railroad. The levee extends along the entire reach. The City’s water treatment plant is located in the south part of the reach, along with three residential structures. The shoreline jurisdictional area west of Westside Highway consists primarily of a maintained grass parkway between the highway and the railroad. The shoreline is mainly used for fishing. Small fishing boats do use the river, but there are no docks, boat ramps, or informal areas to launch a boat. Siltation following the 1980s eruption of Mount St. Helens has rendered the Cowlitz River channel along the reach mostly non-navigable by commercial ship traffic.</td>
</tr>
<tr>
<td>Cowlitz River</td>
<td>Length: 0.61 miles</td>
</tr>
<tr>
<td>Reach 5:</td>
<td>Lake Sacajawea is a 52-acre man-made lake created from the historic Fowler slough in the 1920s. The lake and associated uplands are maintained as a public park, and include a 3.5-mile developed trail, playgrounds, sculptures, benches, picnic tables, developed docks, bridges and islands. There are many overwater structures and bridges throughout the park, which are used for lake access, lookout points, boat docks, and picnic areas. Vegetation in the park consists of mature trees, shrubs, and expanses of mowed grass. Although there are some native trees and shrubs throughout the park, many of the species that were planted historically were exotic/ornamental species, and along the shore of the lake, non-native yellow flag iris and water lilies predominate.</td>
</tr>
<tr>
<td>Lake Sacajawea</td>
<td>Length: 4.40</td>
</tr>
<tr>
<td>Reach 6:</td>
<td>Long Bell Log Pond is a man-made and maintained water body. The 111-acre log pond was created from uplands and historic drainages in the 1920s, for use as a log storage pond. The log pond is currently operated as a man-made, privately-owned, industrial facility designed for the storage of logs, fire suppression, and stormwater management. The entire pond is surrounded by high density development, consisting of industrial paper product and lumber companies, a county sewer treatment plant, Burlington Northern Railroad and Highway 432. Vegetation surrounding the pond shore is very sparse, and vegetated areas consist of a narrow band of trees and shrubs along shore, interspersed with areas of weedy herbaceous species. The majority of the shoreline jurisdiction area is paved and used for equipment storage and industrial buildings.</td>
</tr>
<tr>
<td>Long Bell Log Pond</td>
<td>Length: 0.25</td>
</tr>
</tbody>
</table>
FLOOD CONTROL LEVEES ALONG SHORELINES
The City of Longview is unique to many other shoreline jurisdictions by nature of the protection measures installed to protect the City from flood waters from both the Columbia and Cowlitz Rivers. These flood control levees disconnect the shoreline from the natural flood plain. As a result, the shoreline suffers a loss of wetlands, loss of floodplain storage, loss of opportunity for nutrient cycling, and loss of sediment storage. In addition, the management of flood control levees requires that the integrity of the levee is maintained. This includes the management of vegetation (levee slopes are expected to be mowed to allow for inspection by regulatory agencies and identification of any compromises that have been made to the levee structure by animal burrows or vegetation damage). Levees must also be cleared of woody vegetation in order to ensure that woody vegetation root systems will not damage the integrity of the levee structure in the event of blow down from storm damage. The flood control levee also restricts the ability to improve shoreline functions through restoration and reconnection of the floodplain or vegetation enhancement. In some areas, the levee structure limits the ability to provide public access to the shore and restricts many of the recreational uses waterward of the levee system.

3.0 SHORELINE ENVIRONMENTAL DESIGNATION
Environmental designations are one of the primary methods utilized to avoid cumulative impacts, offset the impact of future development, and ensure no-net-loss of shoreline ecological functions. They provide the framework for implementing shoreline policies and regulatory measures, which are specific to each designation. The recommended shoreline environmental designations for each reach were based on the existing conditions and land uses, as well as the probable future development. Each reach will have an Aquatic environmental designation that will extend waterward from the ordinary high water mark, which is not listed in the table. The purpose of the Aquatic Environment is to protect, restore, and manage the unique characteristics and resources of the area waterward of the OHWM. Provisions for the Aquatic Environment should be directed towards maintaining and restoring habitat for priority aquatic species, shoreline uses and modifications should be designed and managed to prevent degradation of water quality, the size of new over-water structures should be limited to the minimum necessary to support the structure's intended use, and new over-water structures will only be allowed for water-dependent uses, public access, or ecological restoration.

The following table summarizes by reach the current SMP designation, the proposed SMP designation, and the justification for the proposed SMP designation.

<table>
<thead>
<tr>
<th>REACH</th>
<th>ENVIRONMENT DESIGNATION</th>
<th>DESIGNATION JUSTIFICATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>1  Columbia River Barlow Point</td>
<td>Existing: Urban Proposed: High-intensity (deep water portion) Urban Conservancy (downstream of deep)</td>
<td>The comprehensive plan designation for the reach is a combination of Heavy Industrial and Mixed Use Residential/Commercial, and current zoning in the reach is all Heavy Industrial. The deep water portion of the property is owned by the Port of Longview, and although currently undeveloped and used for agricultural purposes, has a high likelihood for large-scale industrial or commercial</td>
</tr>
</tbody>
</table>
### Designation Justification

<table>
<thead>
<tr>
<th><strong>Reach</strong></th>
<th><strong>Environment Designation</strong></th>
<th><strong>Development/Environmental Justification</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Water portion)</td>
<td>development that provides opportunity for water-dependent industrial use. The purpose of the High Intensity designation is to provide for high intensity water-oriented/water dependent commercial, transportation, and industrial uses while protecting existing shoreline ecological functions and restoring ecological functions in areas that have been previously degraded. The area downstream of the deep water portion is mostly privately owned land. A single family residence with a water oriented commercial business operating out of the home is located within this reach. This portion of the reach is given an Urban Conservancy designation, which is consistent with existing land use and comprehensive plan designation. The purpose of the Urban Conservancy designation is to protect and restore ecological functions of open space, flood plain and other sensitive lands where they exist in urban and developed settings, while allowing a variety of compatible uses. This portion of the reach also contains shallower water depths than the upstream portions; therefore, water dependent heavy industrial uses requiring piers or other moorage facilities are not appropriate and would require significant dredging other disturbances.</td>
<td></td>
</tr>
<tr>
<td>2 Columbia River Port of Longview</td>
<td>Existing: Urban Proposed: High-intensity</td>
<td>As this property is largely developed and is operated as marine terminal, High Intensity is the most appropriate designation for this reach, because it provides an existing opportunity for water-oriented high-intensity industrial use. The comprehensive plan designation for the site is Heavy Industrial.</td>
</tr>
<tr>
<td>3 Cowlitz River Washington Street to SR 432</td>
<td>Existing: Urban Proposed: Urban Mixed Use</td>
<td>Current land use and zoning in Reach 3 consists of a mix of residential, industrial, public, and commercial uses. Industrial land use in this reach has limited ability to develop or incorporate water-dependent uses due to the Cowlitz River’s lack of sufficient depths to accommodate water-based transportation of commerce. The purpose of the Urban Mixed-use environmental designation is to both acknowledge the existing presence of; and allow for the continuation of; residential, retail, commercial, office, public/institutional, recreational, and industrial uses, while protecting existing shoreline ecological functions and restoring ecological functions in areas that have been previously degraded.</td>
</tr>
<tr>
<td>4 Cowlitz River City limits to Fishers Lane</td>
<td>Existing: Urban Proposed: Shoreline Residential</td>
<td>The current land use in Reach 4 along the Cowlitz River consists of scattered residences and a water treatment facility in the south portion of the reach, and the Westside Highway and the Cowlitz/Columbia Railway to the north. The comprehensive plan maps the area as Low-Density Residential and Public/Quasi-Public/Institutional. Future land use will like remain the same, as there is very little undeveloped land that is not either owned by the railroad or part of Westside Highway. There is no access to the shoreline in this reach due to the proximity of the highway. Reach 4 has little potential for new development or redevelopment of existing uses within the shoreline area due to limited vacant land and encumbrances from the highway and railroad along the entire reach. The Shoreline Residential designation is appropriate for this reach as the zoning and future land use for the entire reach is residential use. The purpose of the Shoreline Residential environment is to accommodate residential development and appurtenant structures that are consistent with this SMP. An additional purpose is to provide appropriate public use.</td>
</tr>
</tbody>
</table>
Lake Sacajawea Park is designated by the City’s comprehensive plan as Public/Quasi-Public/Institutional. Future land use in this area is not expected to change based on its historical use as public park and the high level of recreational value it provides to the community. The developed park does not lend itself to intensive development. The lake fits well into the urban conservancy environment, which is appropriate for areas that allow development while being compatible with maintaining and restoring the ecological functions of the area.

The Long Bell Log Pond has been historically (and is currently) used as a log storage pond for the adjacent lumber industries. The reach is designed as Light Industrial by the comprehensive plan. Future land use is not anticipated to change in this reach. The use of the reach as an industrial log storage pond is a compatible use of the shoreline, and provides an opportunity for the shoreline to remain used for water-oriented industrial purposes. As the reach is surrounded by industrial development, High Intensity is the most appropriate designation for this reach, as it will continue to provide the opportunity for water-oriented high-intensity industrial use.

4.0 GOALS, POLICIES, AND REGULATIONS

GOALS

The goals listed in the SMP update represent the broadest management principles that establish the intent behind the policies and regulations contained in the SMP. These goals include several designed with the intent to achieve the no net loss principal and include:

- Provide restoration opportunities through the re-establishment and/or rehabilitation of impaired shoreline ecological functions and/or processes through voluntary and incentive-based public and private programs and actions that are consistent with the Shoreline Restoration Plan and other approved restoration plans.

- Protect and preserve the resources and amenities of the City’s shorelines for the use and enjoyment of present and future generations.

- Identify, protect, preserve, and restore important archaeological, historical, and cultural sites located in the shoreline for educational and scientific purposes and enjoyment of the general public.

- The goal for flood risk management is to promote public health, safety, and general welfare and to minimize public and private losses due to flood conditions in specific areas.

- Ensure optimal recreational opportunities now and in the future in shoreline areas that can reasonably tolerate active, passive, or contemplative uses during peak use periods.
achieving no net loss of shoreline ecological function and without destroying the character of the shoreline or unreasonably infringing on privacy or property rights.

GENERAL SHORELINE MANAGEMENT POLICIES AND REGULATIONS

The SMP contains general policies and regulations intended to protect the ecological functions of the shoreline and to prevent adverse cumulative impacts. Key policies associated with shoreline ecological function are summarized below:

Critical Areas
Critical areas within the shoreline jurisdiction will be protected to the same standards provided in the existing environmental protection code Longview Municipal Code 17.10, Critical Areas Ordinance. These regulations are incorporated into the SMP as Appendix C, “Shoreline Critical Areas Regulations,” are inclusive of habitat conservation buffers and development setbacks specific to the individual shoreline reaches, and were designed to protect areas within the City identified as critical areas from the adverse impacts of development.

Vegetation Conservation
The shoreline within the City of Longview has very little native vegetation remaining adjacent to the Cowlitz River, and about 50 percent of the combined Columbia River reaches are vegetated. In addition, the vegetation adjacent to Cowlitz and Columbia River levees is subject to removal for levee maintenance and to prevent flooding.

In order to protect the remaining vegetation within the shoreline jurisdiction, excluding those activities necessary for levee maintenance, the draft Shoreline Master Program includes development policies which specify enhancement of vegetation over time (SMP VI (H) 2). Policies also include the limitations to alterations of the natural landscape, which include preservation of native vegetation including trees to the greatest extent possible (SMP VI (H) 3 (c)), protection of existing buffer function in the Lake Sacajawea shoreline jurisdictional area by the replacement of vegetation impacted by development in the habitat conservation buffer at a 1 : 1 replacement ratio (SMP VI (H) 3 (g)), and general restrictions to clearing and grading to maintain shoreline function (SMP VI (H) 3 (a)). Invasive species may be removed from the shoreline setback by hand and replanted with native species to prevent erosion (SMP VI (H) 3 (d)).

Mitigation
The SMP has also incorporated mitigation requirements for impacts to shoreline functions (SMP VIII (B) 2 (b)). In reviewing shoreline permits, the City of Longview’s Department of Community Development shall require steps to reduce significant ecological impacts according to the mitigation sequence in WAC 173-26-201(2)(e) (Environmental Impact Mitigation) (SMP VIII (B) 3 (a)). General regulations require mitigation measures to be applied in the following priority:

1. Avoiding the impact altogether by not taking a certain action or parts of an action;
2. Minimizing impacts by limiting the degree or magnitude of the action and its implementation, by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts;

3. Rectifying the impact by repairing, rehabilitatibng, or restoring the affected environment;

4. Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action;

5. Compensating for the impact by replacing, enhancing, or providing substitute resources or environments, and/or;

6. Monitoring the impact and taking appropriate corrective measures (SMP IX).

**Water Quality**
All shoreline uses and activities should be located, designed, constructed, and maintained to avoid significant ecological impacts by alteration of water quality, quantity, or hydrology. The City shall require reasonable setbacks, buffers, stormwater storage and, where appropriate, encourage low impact development techniques and materials to achieve the objective of lessening negative impacts on water quality. Additionally, the City will implement the most recently adopted Washington Department of Ecology Stormwater Design Manual.

**Flood Hazard Reduction**
Flood control measures should be sited and designed consistent with appropriate engineering principles, including guidelines of the U.S. Army Corps of Engineers, watershed plans, restoration plans, critical area regulations, floodplain regulations, and stormwater management plans and regulations in order to prevent flood damage, maintain the natural hydraulic capacity of floodways, and conserve limited resources such as fish habitat, water, and soil. New structural flood control works shall only be allowed in shoreline jurisdiction when it can be demonstrated by a scientific and engineering analysis that they are necessary to protect existing development or mitigate or resolve existing stormwater problems, that impacts to ecological functions and priority species and habitats can be successfully mitigated so as to assure no net loss, that appropriate vegetation conservation actions are undertaken, and where non-structural flood hazard reduction measures are infeasible.

**SHORELINE MODIFICATION PROVISIONS (SMP VII)**

**Shoreline Stabilization**
The SMP shoreline stabilization policies reflect a preference for soft-bank over hard-bank shoreline modification (SMP VIII (C) 3 (4)). New development should be located and designed to avoid the need for future shoreline stabilization to the extent feasible (SMP VIII (C) 3 (c)). The shoreline stabilization regulations generally prohibit the development of structures that require new shoreline stabilization (SMP VIII (C) 3 (e)). Exceptions include new stabilization necessary for water dependent uses and to protect existing structures (SMP VIII (C) 2 (a)).
**Dredging and Dredge Material Disposal**
SMP polices support dredging in conjunction with a water-dependent use or water bodies or adjacent shorelands, as part of ecological restoration or enhancement, if it is consistent with the regulations of the SMP (SMP VIII (E) 3 (b)) but does not allow for dredging waterward of the ordinary high water mark strictly for the purposes of obtaining fill (SMP VIII (E) 3 (d)). Also, dredging and disposal of dredge materials shall minimize or avoid ecological impacts (SMP VIII (E) 3 (a)). Associated dredge and dredge disposal regulations require dredging and disposal of dredge material disposal to be done in a manner which avoids or minimizes significant ecological impacts and impacts which cannot be avoided should be mitigated in a manner that assures no net loss of shoreline ecological functions (SMP VIII (E) 3 (c)). Regulations also require that new developments shall be sited to avoid the need for new and maintenance dredging (SMP VIII (E) 3 (e)).

**Fill**
A conditional use permit is required for all fill proposals in floodways and Aquatic and Urban Conservancy shoreline environments (SMP VIII (F) 3 (b)(f)). Fills shall be located, designed, and constructed to protect shoreline ecological functions and ecosystem-wide processes, including channel migration (SMP VIII (F) 3 (c)).

**Moorage Facilities**
Mooring structures should be restricted to the minimum size necessary to meet the needs of the proposed water-dependent use. The length of docks and piers accessory to residential use/development shall be no greater than that required for safety and practicality for the residential use. The maximum length for residential docks or piers shall be limited to sixty (60) feet as measured horizontally from the ordinary high water mark. The maximum width for residential docks or piers shall be limited to 6 feet. Moorage structures shall be sited and designed to avoid, minimize, and mitigate for potentially significant ecological impacts, including impacts on sediment movement, water circulation and quality, and fish and wildlife habitat. Moorage structures are required to be made of materials that have been approved by applicable state agencies. New moorage structures, excluding docks accessory to single-family residences, shall be permitted only when the applicant has demonstrated that a specific need exists to support the intended water-dependent uses.

**SHORELINE USE POLICIES AND REGULATIONS**
The SMP (SMP VI) also details policies and regulations that apply to specific uses within various shoreline jurisdictions including commercial, industrial, recreational, mixed-use, and residential developments, agriculture and aquaculture, boating facilities, in-stream structures, transportation, utilities, and mining with the intent of avoiding and minimizing impacts to the shoreline environment.

**5.0 SHORELINE RESTORATION OPPORTUNITIES**
One of the main goals of the City’s SMP is to develop policies and actions for restoration and improvement of existing shoreline areas with degraded functions. Because it is not always feasible for shoreline development and redevelopment to completely avoid impacting shoreline
functions, as part of the SMP, a shoreline restoration plan has been developed that identifies opportunities for restoration and enhancement of shoreline functions to improve the overall health of the City’s shorelines and for use as mitigation when impacts cannot be avoided.

As mentioned previously, restoration opportunities within the shoreline jurisdiction areas of the City are extremely limited by the location of the flood control levees along the Cowlitz and Columbia Rivers, private landownership, and also by the suitability of the resource for restoration. There are restoration opportunities along the Cowlitz River in the vicinity of Gearhart Gardens Park and the future proposed Cowlitz River Park Site, both located in Reach 3, and along Lake Sacajawea, which constitutes Reach 5 discussed in the Shoreline Restoration Plan. Restoration methods take into account the recommendations from local watershed restoration plans and are mainly geared toward improvement of riparian habitat functions.

6.0 CUMULATIVE IMPACTS

The Cumulative Impacts Analysis determined that compliance with the SMP provisions and other applicable local, state, and federal regulations will, at minimum, result in no net loss of water quality and water quantity functions. As stated above, there is limited opportunity for mitigation of habitat impacts within City limits. The preferred sequencing of mitigating habitat functions onsite (where feasible), mitigating offsite within City limits, and finally mitigating offsite and outside City limits will be followed. Habitat impacts will be fully mitigated, however, while some reaches may see an improvement in habitat function, other reaches may see no net loss of habitat function, and future development in some reaches may be required to mitigate outside of City jurisdiction, which will result in an improvement of habitat functions within the same watershed.

7.0 CONCLUSIONS REGARDING NO NET LOSS

The presence of levees along the majority of developable shorelines within the City generally provides a functionally isolated barrier between development and the immediate shoreline and has also disconnected the shoreline from floodplains and wetlands landward of the levee. The majority of the shoreline landward of the levee has been developed limiting riparian habitat; therefore, new landward development in these areas will generally have little impact on remaining shoreline functions.

Stormwater treatment regulations will be required for proposed development and will protect water quality and mitigate water quantity impacts. Generally, if no development is proposed waterward of the levee, and in most reaches it will not be, stormwater runoff will not directly flow into the shoreline-regulated waterways; it will flow into the City’s extensive and highly regulated ditch system. Water dependent development at the Port of Longview or Barlow Point will be subject to strict water quality and water quantity regulations at the local, state, and federal levels. No change in water quality or water quantity is anticipated.

In general mitigation opportunities for habitat impacts are very limited due to presence of the levees and lack of land waterward of the levees. Efforts will be made to mitigate onsite where
possible; however, habitat impacts should be mitigated where it makes the most sense ecologically, which will likely be offsite. Offsite areas within City limits include Gearhart Gardens Park, the Cowlitz River Park site, or Lake Sacajawea. Lake Sacajawea may not be appropriate to mitigate for impacts along the Cowlitz or Columbia Rivers. These park sites, however, may not have enough land to compensate for applicants proposing a large amount of shoreline impacts, such as a large development at Barlow Point. Most likely, mitigation will occur partially within City limits and partially outside City limits at sites along the Columbia or Cowlitz Rivers, and potentially at the Coweeman Mitigation Bank, which is currently in the permitting process. Offsite mitigation within the same watershed will benefit the same species that use shoreline and nearshore areas and will also improve the overall shoreline functions of the watershed that cannot be replaced in City limits such as flood storage, floodplain connectivity, and off-channel habitat creation, due to the presence of the dikes.

Compliance with the SMP provisions and other applicable local, state, and federal regulations will, at minimum, result in no net loss of water quality and water quantity functions. As stated above, there is limited opportunity for mitigation of habitat impacts within City limits. The preferred sequencing of mitigating habitat functions onsite (where feasible), mitigating offsite within City limits, and finally mitigating offsite and outside City limits will be followed. Habitat impacts will be fully mitigated, however, while some reaches may see an improvement in habitat function, other reaches may see no net loss of habitat function, and future development in some reaches may be required to mitigate outside of City jurisdiction which will result in an improvement of habitat functions within the same watershed.
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