
Comments on the draft Michigan Coastal Management Program's 2026-2030 Enhancement Assessment and Strategies

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We appreciate this opportunity to comment on the coastal enhancement assessment and strategies. Michigan is fortunate to have one of the better coastal zone management programs in the nation, and the assessment and strategies are important in maintaining that status.

The central organizing principle of Flow Water Advocates' work is the public trust doctrine. Protecting the waters of the Great Lakes, their bottomlands, and shorelines is critical and a paramount priority of the State of Michigan, acting as trustees on behalf of the people. The public trust doctrine is the lens through which we view your enhancement and assessment.

Shore armoring: We believe greater emphasis should be placed on reviewing the impact of the shore armoring permits issued during the high water period of 2019-2020. Your assessment notes that "over 2,820 Part 325 Great Lakes bottomlands permits were issued in 2019/2020, a rate approximately five times higher than other years."

We recognize that the high water levels threatened coastal properties, but the volume and short turnaround time on shore armoring applications raised questions about

EGLE's ability to assure protection of public trust resources. As the document notes, "It is likely in some highly armored areas, beaches will not return, even as water levels drop." The document further observes that the extensive shore armoring could "increase erosion, eliminate beaches and deepen the lakebed over time. This can result in lost habitats, reduced species abundance and diversity, diminished or lost public access, diminished downdrift beaches, etc."

EGLE, with appropriate opportunities for public participation, should conduct a policy and cumulative environmental impact analysis of the cascade of permits that were issued. This review should include recommendations for policy change to better protect public trust values.

Public Access: We appreciate the efforts EGLE is making to build an inventory list of public access across Michigan's shoreline. This responds to a critical need. While the 3,288 miles of Great Lakes shoreline make precise numbers difficult to establish, we believe it can be done with adequate aerial and ground-truthing effort. Having such data enables citizens to exercise their public trust rights, but also enables EGLE to do a better job of monitoring coastal land use changes.

We disagree that the priority level for public access should be reduced from high to medium. If the downward classification is based on "the need for comprehensive, statewide data" as your draft document suggests, the collection of that data should itself be a high priority.

Special Area Management Plans (SAMPs): We disagree with the medium priority status assigned to SAMPs. The draft document notes that "MCMP recognizes" the potential of SAMPs to encourage protection of important natural features in the coastal zone and that conserving these areas and their corridors and buffers is key to the survival of these resources. Thus, there is little or no time to defer this work.

In addition, EGLE should partner with the Natural Resources Trust Fund to identify special areas in the coastal zone as opportunities for state or local acquisition or purchase of development rights.

Reviewing the Status of Environmental Areas: We support the proposal to evaluate the status of environmental areas designated pursuant to the Great Lakes Shorelands Act of 1970. This is long overdue. The evaluation should include recommendations for the designation of additional critical environmental areas.

EGLE will use this information to prioritize specific EAs for management plan updates or updates to the EA boundaries. EGLE will develop a policy and procedure on updating EA management plans, modification of EAs, and termination of EAs. EGLE will develop outreach materials and Best Management Practices for property owners of EAs, local units of government, and CISMAs.

Thank you for the opportunity to comment on Michigan's coastal management program.