

Chapter VI

Federal Agency Program Roles and Consideration of the National Interest

One objective of Michigan's Coastal Management Program is to strengthen coordination and cooperation among federal, as well as local and state agencies and interests. This chapter focuses on: (1) forums utilized for continued federal coordination and consultation; (2) the process for evaluating and assuring federal agency consistency with program provisions; and (3) mechanisms which provide for consideration of the national interest in Michigan's coastal area.

FEDERAL AGENCY CONSULTATION AND COORDINATION

Michigan's experience demonstrates that federal-state coordination can assist in achieving mutually desirable goals for coastal management. Examples include the coordination of off-road vehicle regulations on state and federal lands; coordination of permit processes between the United States Army Corps of Engineers and the state relative to activities on Great Lakes bottomlands; and state-federal efforts to protect scarce breeding habitats of certain rare and endangered species.

The Coastal Management Program will strive to strengthen this coordination effort. During program development, over 500 contacts were made with federal agencies to request comments, solicit statements of national interest, and answer questions. A total of 20 public meetings and 13 public hearings were conducted to provide program information and receive comments on program documents. Many federal agencies were present at these sessions to discuss their program concerns. Michigan actively participates on the Great Lakes Basin Commission's Coastal Zone Standing Committee which provides a forum for state-federal interaction. As described in the following, these and other efforts will be continued during program implementation to insure federal-state consultation and coordination, and to facilitate federal consistency determinations and consideration of the national interest.

Federal Agency Program Participation

To assure that federal agency programs and interests were recognized in the Coastal Management Program, federal agencies were contacted in early 1975 to ascertain various federal program responsibilities and authorities and to solicit comments on the developing program through review of documents which describe various program elements. Contacts with at least 30 federal agencies have been established on a formal and/or working basis. Several of these federal agencies coordinate programs and responsibilities with one or more state agencies, (e.g. Environmental Protection Agency). Following is a list of federal agencies consulted by the Coastal Management Program.

COUNCIL ON ENVIRONMENTAL QUALITY

DEPARTMENT OF AGRICULTURE

- Forest Service
- Soil Conservation Service

DEPARTMENT OF COMMERCE

- Economic Development Administration
- Great Lakes Environmental Research Laboratory
- Maritime Administration
- National Marine Fisheries Service
- National Oceanic and Atmospheric Administration

DEPARTMENT OF DEFENSE

- Michigan Air National Guard
- U.S. Air Force
- U.S. Army
- U.S. Army — Corps of Engineers
- U.S. Navy

DEPARTMENT OF HEALTH, EDUCATION AND WELFARE

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

DEPARTMENT OF INTERIOR

- Bureau of Indian Affairs
- Bureau of Land Management
- Bureau of Mines
- Heritage Conservation and Recreation Service

- Fish and Wildlife Service
- Geological Survey
- National Park Service

DEPARTMENT OF JUSTICE

DEPARTMENT OF STATE

- Office of Environmental Affairs

DEPARTMENT OF TRANSPORTATION

- U.S. Coast Guard
- Federal Aviation Administration
- Federal Highway Administration
- Federal Railroad Administration
- St. Lawrence Seaway Development Corporation

DEPARTMENT OF TREASURY

ENVIRONMENTAL PROTECTION AGENCY

ENERGY RESEARCH AND DEVELOPMENT
ADMINISTRATION

GENERAL SERVICES ADMINISTRATION

FEDERAL ENERGY ADMINISTRATION

FEDERAL ENERGY REGULATORY COMMISSION

FEDERAL POWER COMMISSION

NUCLEAR REGULATORY COMMISSION

Each of these agencies received copies of program documents, including "A Proposed Program for Michigan's Coast" and "State of Michigan Coastal Management Program and Draft Environmental Impact Statement". The federal agencies also receive "The Shorelands Watch", a monthly program newsletter, area of particular concern nomination forms and other materials. Ongoing state-federal agency consultation and coordination is facilitated by federal agency nominations for areas of particular concern and by collaborating jointly with the state on technical and financial assistance programs relative to erosion protection, wetlands management, location of sites for polluted dredged materials, and others. Specific requests were made to federal agencies to provide the Coastal Management Program with descriptions of federally owned lands along the coast, (see also Chapter II). Michigan's Coastal Management Program efforts to identify federal agency responsibilities, program

concerns and interests is summarized in Appendix A of "State of Michigan Coastal Management Program and Draft Environmental Impact Statement". All substantive federal agency comments and area of particular concern nominations will continue to be considered in the Coastal Management Program and integrated wherever possible.

State-Federal Interagency Agreements

To achieve mutually desirable objectives in resource management, state and federal agencies have formulated a number of interagency agreements which complement the goals of the Coastal Management Program and assure close state-federal coordination. For example, a memorandum of understanding between the Department of Natural Resources and the United States Army Corps of Engineers establishes a joint process for reviewing applications for permits and conducting public hearings with respect to actions proposed under the federal River and Harbor Act of 1899, the federal Water Pollution Control Act amendments of 1972, and state Act No. 247 of the Public Acts of 1955 and state Act No. 346 of the Public Acts of 1972.

Another interagency agreement exists between the National Park Service and the state to insure coordination on wildlife management relative to Sleeping Bear National Lakeshore.

Administration of Federal Programs

The Department of Natural Resources administers some 41 programs through federal funds, authorized by federal legislation. Examples include water pollution control programs, administered by the Department's Water Quality Division in conjunction with the Environmental Protection Agency and Public Law 84-666 and Public Law 95-200, and programs which provide for outdoor recreation areas and facilities, administered by the Department's Recreation Services Division in conjunction with the National Heritage Conservation and Recreation Service and the Land and Water Conservation Fund.

Through funds provided by federal agencies, the state is able to administer programs to achieve both state and national goals in resource management.

Great Lakes Basin Commission

As previously noted, Michigan actively participates on the Great Lakes Basin Commission's Standing Committee on Coastal Zone Management. The purpose of this committee is to assist Great Lakes states in achieving beneficial interstate and federal agency coordination in coastal management programs. Many representatives of federal agencies regularly attend committee meetings to discuss and resolve conflicts concerning such topics as transportation of hazardous and toxic materials, winter navigation, pollution abatement, etc. Through committee participation, the Coastal Management Program actively consults with federal agencies to identify and consider concerns and program recommendations.

Fish and Wildlife Coordination Act

Since 1934, the Department of Natural Resources has complied with provisions of the Fish and Wildlife Coordination Act of 1934, as amended, which states that, "... any department or agency of the United States, or any public or private agency operating under federal permit or license, proposes to impound, divert, channel or otherwise control or modify a stream or body of water for any purpose shall consult with the United States Fish and Wildlife Service, Department of the Interior, and with the head of the agency exercising administration over the (fish and) wildlife resources of the particular state wherein the proposed activity is to be constructed with a view to the conservation of fish and wildlife resources by preventing loss of and damage to such resources, as well as providing for the development and improvement thereof in connecting with water resource development."

The Act provides for cost allocation and cooperative funding arrangements to carry on mitigation, land acquisition and necessary investigations. It also requires that any report submitted to Congress supporting a recommendation for authorization of any new project for the control or use of water must include an estimation of fish and wildlife benefits or losses to be derived. Each report identifies those benefits to be derived from measures recommended specifically for the development and improvement of fish and wildlife resources. The Fish and Wildlife Coordination Act does not apply to impoundments of less than 10 acres, or to activities for or in connection with programs primarily for land management and use carried out by federal agencies with respect to federal lands under their jurisdiction. In addition to the Fish and Wildlife Service, Michigan consults with the National Marine Fisheries Service on matters relating to compliance with mandates of the Act.

Review of Environmental Impact Statements

The National Environmental Policy Act of 1969 (NEPA) requires that federal agencies diligently assess the environmental impacts of any "major" actions. The Act requires the preparation of an environmental impact statement (EIS) for any "major federal action significantly affecting the quality of the human environment." These provisions have been liberally interpreted by the courts to cover a wide range of federal actions including private projects that require federal permits, federal assistance and direct federal projects or programs.

Michigan's authority for preparation and review of environmental impact statements is established by Executive Order 1974-4, (see also, Chapter V). Executive Order 1974-4 satisfies NEPA mandates by requiring that all major activities of each state agency having a potentially significant impact on the environment or human life be the subject of a formal environmental impact statement, to be reviewed by the Michigan Environmental Review Board (MERB) and the Interdepartmental Environmental Review Committee (INTERCOM). Through review of state and federal agency environmental impact statements, MERB and INTERCOM serve as a formal mechanism for coordination and resolution of conflicts among state and federal activities, consistent with the spirit and intent of the National Environmental Policy Act of 1969.

As established by Executive Order 1974-4, the Department of Natural Resources

is a permanent member of both the Michigan Environmental Review Board and the Interdepartmental Environmental Review Committee. As described in Chapter V, Executive Order 1974-4 requires each state agency to forward to the attention of the Governor, an environmental impact statement on each proposed major action that may have significant impact on the environment or human life. Impact statements which are required by regulation of state or federal agencies comply with the requirements of the Executive Order.

The Michigan Environmental Review Board, also established by the Executive Order, receives environmental impact statements and forwards copies to INTERCOM within five days. INTERCOM has 40 days to review and recommend a course of action to MERB. MERB considers these recommendations in reviewing the environmental impact statement and may recommend to the Governor actions of state agencies that should be suspended or modified if such actions should seriously threaten the quality of the environment or human life.

In making recommendations to the Governor on federal or state agency environmental impact statements, the Board considers all interests and views as may be presented formally to the Board. Thus, private citizens, groups, state or federal agencies, etc., may appear before the Board and offer recommendations on environmental impact statements. This process provides for coordination and integration of these interests in Board recommendations to the Governor. As described later in this chapter, the provisions of Executive Order 1974-4 provide an important forum for considering the national interest in Michigan's coastal area.

A-95 Review Procedures

A-95 review process is provided for in Title IV, Section 403 of the Intergovernmental Cooperation Act of 1968. This title establishes the broad policy base of Office of Management and Budget Circular A-95. A-95 provides for a network of state and areawide clearinghouses for the purpose of reviewing and commenting on all notices of intent to apply for federal assistance in Michigan. The purpose of the review process is to provide federal cooperation with state and local governments in the evaluation, review and coordination of federal and federally assisted programs and projects.

The A-95 review process requires that any agency or individual who applies for federal assistance for a project or a direct federal development be required to notify both state and areawide clearinghouses in whose jurisdiction the project is to be located. If the activity is statewide (or broader in nature), the areawide clearinghouse may not receive notification. Federally recognized Indian tribes are excluded from the A-95 review unless they voluntarily choose to participate.

Since eight of Michigan's ten coastal planning and development regional agencies are designated as A-95 areawide clearinghouses, Michigan will continue to rely heavily upon the A-95 review process to maintain federal-state-local consistency with the Coastal Management Program.

Michigan's state clearinghouse is within the Department of Management and Budget's Federal Aid Management and Coordination Division. The functions of this division were established by Executive Directive 1972-2 and Executive Order 1974-1.

Functions of the state clearinghouse include: (1) evaluate the significance of proposed federal or federally assisted projects to state programs; (2) receive and disseminate project notifications to appropriate state and multi-state agencies; (3) provide liaison between state agencies and the applicant or federal project agency; (4) assure that projects affecting the coastal area are referred to authorized agencies to review the project for consistency; (5) assure that agencies authorized to develop and enforce environmental standards are informed and provided opportunity to review and comment on federal projects; (6) provide agencies enforcing civil rights laws with the opportunity to review and comment on the civil rights aspects of the project; and (7) provide liaison between federal and local agencies and between the applicant and the commenting agency.

Within 30 days after receipt of a notice of intent, the state clearinghouse must indicate to the applicant, the nature and substance of comments received regarding the proposal. In Michigan, the first five to seven days of the period is used by the clearinghouse in assembling and distributing a weekly list of "notices of intent".

Distribution is presently made to approximately 90 departments, agencies and quasi-governmental groups. The agencies have 14 days in which to comment to the state clearinghouse on projects of concern. Comments may take three forms: (1) the agency may request more information such as the exact location of the project; (2) the commenting agency may request to review the complete grant application; or (3) the state agency may request a meeting with the applicant or project agency. The state clearinghouse acts as a liaison to schedule and chair the meeting.

If no comments or requests for additional review are received by the clearinghouse within 14 days of distribution, a response is made to the applicant. If requested, a complete application will be provided with an additional 30 days to complete the agency review. If a meeting is scheduled to negotiate issues, the time span for application review will be adjusted accordingly.

The applicant must include all comments and recommendations received from the clearinghouse as part of a completed application. If no comments are received, the applicant provides a statement indicating that review procedures were followed. Grant applications lacking evidence of clearinghouse review are returned to the applicant.

To keep the clearinghouse aware of events subsequent to their comments, federal agencies notify concerned clearinghouses within seven working days of any major action taken concerning the application which may include: grant awards; rejections, amendments, deferrals and withdrawals of the application. If federal action is contrary to the clearinghouse recommendations, the funding agency is required to provide an explanation of its action along with a notice of major action taken.

Thus, the A-95 review process provides a forum for state and local coordination on federal projects or funding efforts. A description of the A-95 review process as it relates to program federal consistency determinations is contained later in this chapter.

Forums described thus far demonstrate Michigan's commitment to strengthen state-federal relationships through ongoing consultation and coordination. Following sections of this chapter describe: (1) the process which will be used to assure federal consistency with the Coastal Management Program; and (2) forums which provide for consideration of the national interest in Michigan's coast.

FEDERAL CONSISTENCY

The federal Coastal Zone Management Act requires federal agency actions to be consistent with approved state coastal management programs. This requirement applies to activities requiring federal licenses or permits and federal assistance programs to local or state governments. Federal activities and development projects must be consistent to the maximum extent practicable with the approved state program.

The Division of Land Resource Programs, Michigan Department of Natural Resources will be responsible for federal consistency review. The division's Coastal Management Program Unit will be responsible for coordination of consistency review and time scheduling. As cited in Chapter V, substantive requirements of programs administered by the division relative to controlling soil erosion and sedimentation, natural rivers, inland lakes and streams, natural areas, Great Lakes submerged lands, shoreland erosion and flooding and shorelands wetland protection will be utilized for consistency reviews conducted directly by the division. Permit reviews conducted by other department divisions (e.g., air and water quality) and by other state agencies and participating local agencies and governments will be coordinated for coastal consistency by the Coastal Management Program Unit. The unit will also be responsible for direct review of A-95 notices of intent to apply for federal assistance. The Environmental Enforcement Division will work in conjunction with the Coastal Management Program Unit on coordinating review of federal environmental impact statements among Department of Natural Resources divisions and by the Michigan Environmental Review Board, (see also, Chapter V).

Criteria for Determining Federal Consistency

Chapters III and V of this impact statement describe policies which are included in Michigan's Coastal Management Program. Policy statements are derived from state statutes and rules, Executive Orders of the Governor, formal policies of the Natural Resources Commission and certain federal laws, regulations and inter-agency agreements (e.g., Public Law 92-500). Enforceable policies included in this program require federal consistency. Significant policies described in Chapter III and also listed in Chapter V are the principal authorities Michigan will utilize to control direct and significant impacts to coastal waters and determine federal consistency. An affirmative response to any of the direct and significant criteria statements in Chapter V triggers an individual permit process for the cited statutory authority. Other enforceable policies which necessitate federal consistency include Natural Resources Commission Policy Numbers 3301 and 3108 which pertain to Great Lakes fisheries management (as described in Chapter III).

Chapter III of this impact statement also describes nonenforceable policies which pertain to technical and financial assistance, coordination, etc. While federal agencies will not be required to be consistent with nonenforceable policies, they should be considered by federal agencies as part of the consistency process. It is anticipated that many of those policy statements will provide one basis for enhanced state-federal agency cooperation on mutually desirable projects affecting Michigan's coast,

including wetlands management, erosion protection, flood plain management, selection of sites for polluted dredged materials and others.

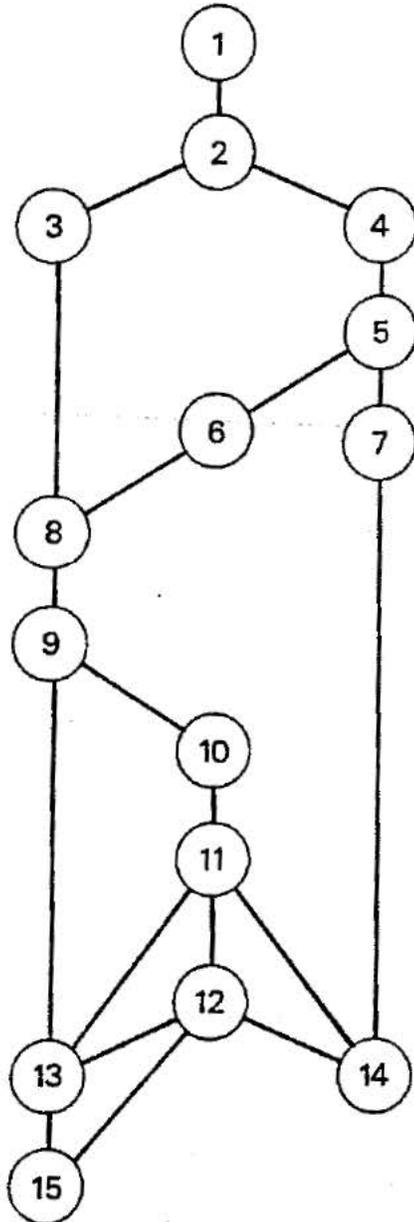
FEDERAL CONSISTENCY — FEDERAL CONDUCTED OR SUPPORTED ACTIVITIES

A consistency determination will be required for ongoing federal activities other than development projects initiated prior to program approval which are governed by statutory authority under which the federal agency retains discretion to reassess and modify the activity. In these cases, the consistency determination must be made by the federal agency at the earliest practicable time following management program approval, and the Michigan Coastal Management Program must be provided with a consistency determination no later than 120 days after program approval for ongoing federal activities affecting Michigan's coastal area.

Procedures

Figure VI-A illustrates the process for determining federal consistency for federally conducted or supported activities. These activities may include property acquisition or disposition, design, construction, alteration or maintenance of federal facilities, etc. within the coastal boundary or which may have a significant impact on the coastal zone. Federal agencies are responsible for notifying the Division of Land Resource Programs of its proposed action and making a determination that the activity is consistent to the maximum extent practicable with the Coastal Management Program. For major federal agency activities which may significantly impact the coast, environmental impact statement review procedures, established by the Governor's Executive Order 1974-4 will be used to satisfy both state and federal requirements, (e.g., National Environmental Policy Act), and will serve as an important process for reviewing federal agency actions to determine consistency with Michigan's Coastal Management Program. This review process will be facilitated by the Michigan Environmental Review Board where the Department of Natural Resources is a permanent representative, and also satisfies National Environmental Policy Act requirements. Upon notification of a federal activity or development project, the Division of Land Resource Programs will notify local participating agencies. A 45-day review period will ensue which may be extended to 60 days upon request. The Division of Land Resource Programs will then act on its own behalf and on behalf of local/regional and state agency program participants using one of three options: (1) concur with the federal agency determination; (2) allow 45 days to pass, thereby enabling the federal agency to presume concurrence (except where the state requests review extensions); or (3) disagree with the federal agency determination. In the event of the latter (option 3), the Division of Land Resource Programs will negotiate with the federal agency, on its own behalf and behalf of local/regional and state agency participants, to achieve consistency. Upon failure to achieve consistency, either party — state or federal — may appeal to the Secretary of the United States Department of Commerce for mediation. If mediation is not used or is unsuccessful, the state may seek resolution in court action.

Process for Review of Federally Conducted or Supported Activities



- 1) Federal agency initiates a federal development project, plans to acquire or dispose of land or proposes a change in rules and regulations.
- 2) Federal agency evaluates effect of proposal on the coastal area.
- 3) Proposal determined to have no significant effect on coastal area.
- 4) Proposal determined to have significant effect on coastal area.
- 5) Federal agency evaluates proposal, for consistency, with Michigan's Coastal Program.
- 6) Proposal determined to be consistent to the maximum extent practicable with Michigan's Coastal Program.
- 7) Proposal determined to be inconsistent with Michigan's Coastal Program.
- 8) Michigan Coastal Program notified of federal determination.
- 9) Review by state and local/regional program participants.
- 10) Michigan Coastal Program disagrees with federal determination and gives justification.
- 11) Negotiations between Michigan Coastal Program and federal agency.
- 12) Disagreement; Michigan Coastal Program and federal agency begin mediation and conflict resolution.
- 13) Michigan Coastal Program concurs with determination.
- 14) Proposed activity discontinued or modified to be consistent with or have no direct effect on the coastal area.
- 15) Federal agency proceeds with activity.

FEDERAL CONSISTENCY — FEDERAL GRANTS AND FINANCIAL ASSISTANCE

Procedure

In an attempt to avoid creating a new forum for review of federal programs providing grants and financial assistance that directly affect or result in a direct effect on Michigan's coastal area, existing state and regional clearinghouses (OMB Circular A-95) will be utilized as the process for determining federal consistency. Only those grant and loan applications to federal agencies started after the program's approval by the Secretary of Commerce are subject to the federal consistency requirements.

Eight of the ten regional planning and development agencies that participate in Michigan's Coastal Management Program are designated by the state clearinghouse as areawide clearinghouses for the A-95 review process. Through the A-95 review process, the state and areawide clearinghouses notify state, regional and local officials of an applicant's intent to request federal assistance for the initiation of a program or project. These officials may then comment on the proposal, (see also the first section of this chapter). Figure VI-B illustrates the process to be used for determining federal consistency of federal grants and financial assistance.

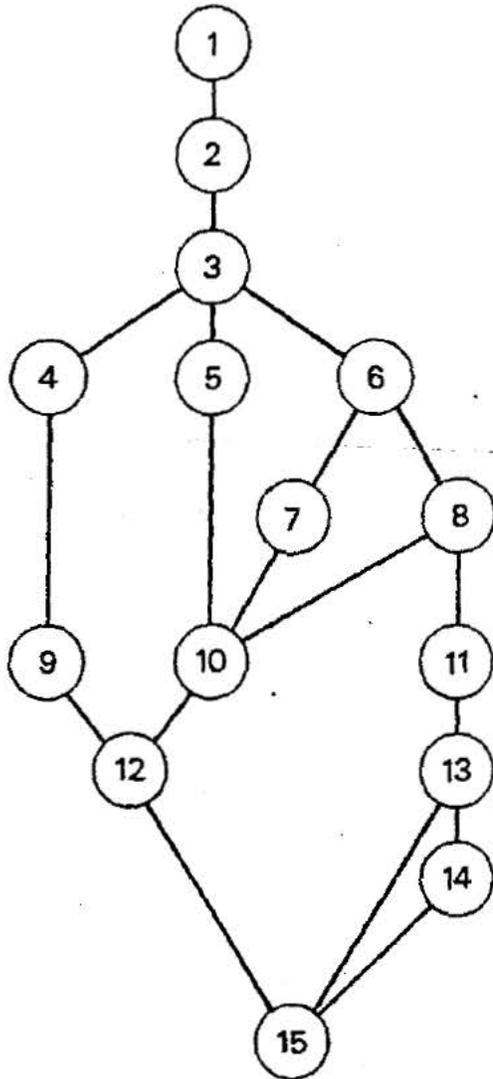
Many federal grants have received Coastal Management Program attention to date due to their potential for coastal impact (refer also to Appendix A of "State of Michigan Coastal Management Program and Draft Environmental Impact Statement".) The Coastal Management Program will continue to review proposed federal grants and financial assistance for consistency during program implementation. It should be recognized that a development project which receives approval for federal funding must still be approved through the normal municipal or state permit procedures.

FEDERAL CONSISTENCY — ISSUING LICENSES AND PERMITS

Consistency review for federal permits employs the substantive requirements of state permitting authorities and authorities in certain state approved local enforcement programs, (See Chapters III and V). The key to assuring the consistency of federal permits is the requirement that permits from the state and approved local programs be granted prior to issuance of the federal permit. Only those license and permit issuing and amendment activities and federal assistance applications initiated after the date of approval of Michigan's Coastal Management Program are subject to federal consistency requirements.

An applicant for a federal permit will be required to demonstrate to the federal agency that he has received the necessary local and/or state approvals. To accomplish this the Coastal Management Program will provide guidance to applicants concerning the permit procedures and requirements to be satisfied, (see also Chapter V). When satisfied that the proposed activity meets federal consistency requirements of the Coastal Management Program, all applicants for federal licenses or permits subject to consistency review shall provide in the

FIG. VI-B
 Process for Review
 of Federal Domestic Assistance Grants



- 1) Applicant agency applies to federal agency for assistance.
- 2) Applicant agency provides application to regional "A-95" clearinghouse; application is routed to state "A-95" clearinghouse, to Michigan's Coastal Program and to participating local/regional entities.
- 3) Review.
- 4) State agency comments to state clearinghouse.
- 5) Substate and municipal entities comment to regional clearinghouse.
- 6) Local/regional entities or state agency objects, notifies Michigan Coastal Program, applicant and/or affected federal agency.
- 7) Michigan Coastal Program determines that application is either consistent or has no effect on the coastal area.
- 8) Michigan Coastal Program determines that application is inconsistent.
- 9) State clearinghouse signs off with comments.
- 10) Regional clearinghouse signs off with comments.
- 11) OCZM and federal agency notified of inconsistency.
- 12) Applicant receives sign-offs and comments; forwards to federal agency.
- 13) Negotiations among Michigan Coastal Program, applicant, and federal agency.
- 14) Application inconsistent; application either modified to be consistent or funding is denied by federal agency.
- 15) Application consistent.

applications to the federal licensing or permitting agency a certification that the proposed activity complies with and will be conducted in a manner consistent with Michigan's Coastal Management Program. At the same time, the applicants shall furnish the Michigan Coastal Management Program Unit a copy of the certification. This consistency determination will be especially facilitated where state and federal agencies have coordinated permit processes, such as the process for coordinated review of permits issued under Act No. 247 of the Public Acts of 1955 and Section 404 of the Federal Water Pollution Control Act.

In cases where state permits are not required of applicants for activities requiring federal licenses or permits, the applicant is responsible for certifying in its application to the federal agency that the proposed action is consistent with the Coastal Management Program. The applicant must also furnish the state with a copy of the consistency certification. Federal agencies may deny a permit or license pursuant to their statutory responsibilities notwithstanding state concurrence.

The list below indicates what federal permits have received program attention to date due to their regulation of important coastal resources, uses or impacts. Michigan proposes to review proposals submitted through these permit programs for consistency during program implementation. Other permits may, of course, be added as further needs are indicated.

A maximum six month time period will exist for acting on a federal license or permit consistency certification after which time consistency will be conclusively presumed. Alterations in permit and licensing criteria will be effectuated through federal agency consultation and approval by the United States Department of Commerce.

Department of Agriculture

43 USC 1716

Permits for water easements on National U.S. Forest Service lands (Forest Service)
Use and occupancy of land for hotels, resorts, summer homes, stores and facilities for industrial, commercial, educational or public use

16 USC 497

Use and occupancy of land for hotels, resorts, summer homes, stores and facilities for industrial, commercial, educational or public use.

17 USC 661-667

Fish and Wildlife Coordination Act

Department of Interior

16 USC 3

Construction of visitor facilities on National Park Service lands (NPS)

16 USC 5

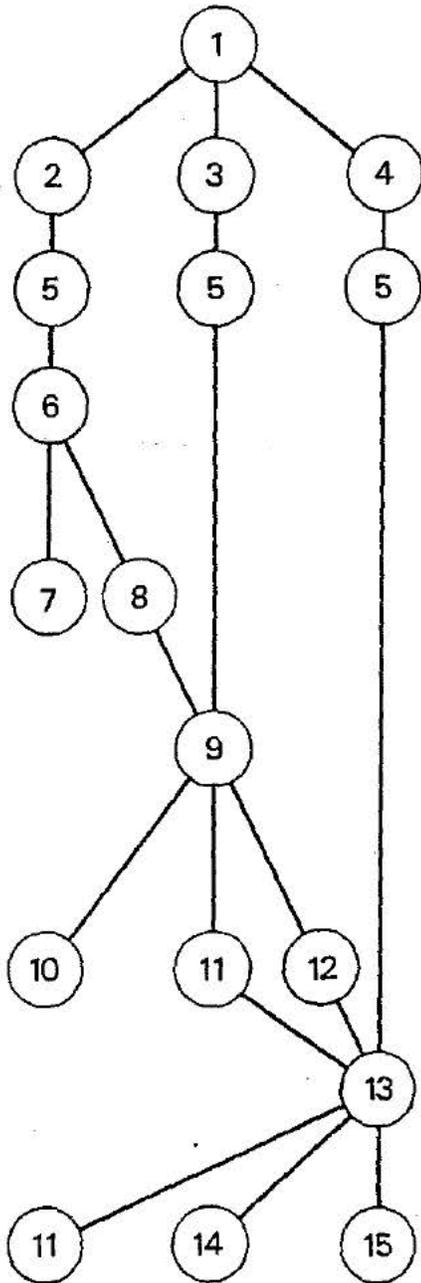
Rights-of-way for electrical transmission lines on National Park Service land (NPS)

Reclamation permits at dam sites and recreation areas

Environmental Protection Agency	
33 USC 1251	Water pollution control (state permit required)
33 USC 1857	Clean air (state permit required)
Department of Housing and Urban Development	
----	Flood insurance permits (state permits required)
----	Interstate land sales registration (state permit may be required)
Nuclear Regulatory Commission	
----	Licenses for nuclear generating stations, fuel storage and processing centers
----	Siting and operation of nuclear power plants (state permits required)
Federal Energy Regulatory Commission	
16 USC 797(e)	Licenses required for nonfederal hydroelectric projects and associated transmission lines
15 USC 717(f)(c)	Certificates required for the construction and operation of natural gas pipeline facilities, defined to include both interstate pipeline and terminal facilities
15 USC 717(f)(b)	Permission and approval required for the abandonment of natural gas pipeline facilities
Department of Defense — Army Corps of Engineers	
33 USC 401-403	Excavation and fill permits, construction in navigable waters (state permit also required)
33 USC 1344	Discharge of dredge and fill material
33 USC 419	Hazardous substances and materials (state permit required)
Department of Transportation	
33 USC 401	Construction and modification of bridges, causeways in navigable waters (US Coast Guard) (state permit also required)
----	Construction of airports (state permits may be required)

Figure VI-C illustrates the process used to review these permits for consistency.

FIG. VI-C
 Process for Determining
 Consistency of Federal Licenses and Permits



- 1) Applicant inquires at federal, state or local office about permit requirements. Applicant directed to appropriate federal, state and local offices.
- 2) Applicant applies for local permit if appropriate.
- 3) Applicant applies for state consistency review and for state permit if required.
- 4) Applicant applies for federal permit.
- 5) Public notice and review; hearings if appropriate. Federal, state and local agencies may perform this function individually or jointly as appropriate.
- 6) Local agency acts on application.
- 7) Application does not meet local requirements — applicant must re-apply.
- 8) Application meets local requirements, local permit granted.
- 9) State acts on application and/or consistency with state program.
- 10) Application does not meet state requirements — applicant must re-apply.
- 11) Application inconsistent with state program — applicant must re-apply.
- 12) Application meets state requirements and is consistent with state program — state permit granted.
- 13) Federal agency acts on application.
- 14) Application does not meet federal agency requirements — applicant must re-apply.
- 15) Application meets federal agency requirements and is consistent with state program — federal permit granted.

CONSIDERATION OF THE NATIONAL INTEREST

Recognizing the distinct and irreplaceable nature of the nation's coast, the United States Congress, in enacting the Coastal Zone Management Act of 1972, found that, "... there is a national interest in the effective management, beneficial use, protection, and development of the coastal zone." The Michigan Coastal Management Program clearly provides forums and policy statements which reflect the national interest in coastal management in Michigan. Specifically, Section 306(c)(8) of the Coastal Zone Management Act requires state coastal management programs to provide for, "... adequate consideration of the national interest involved in planning for, and in the siting of facilities (including energy facilities in, or which significantly affect such state's coastal zone) which are necessary to meet requirements which are other than local in nature."

Michigan fully recognizes that coastal issues and concerns reflect a national interest for energy development, wetlands management, protection of rare and endangered species and other facility siting and resource protection issues. Many national interests are mutually shared by Michigan and are illustrated in policy statements and action programs, cited in Chapter III of this impact statement, as well as state-federal interagency agreements.

Previous sections of this chapter describe Michigan's extensive effort to actively consult with federal agencies on their missions relative to the national interest. In addition to comments received from federal agencies, the Michigan Coastal Management Program evaluated, and will continue to evaluate, the following sources for policies and information to adequately consider the national interest in planning and management responsibilities:

- Federal laws and regulations.
- Policy statements or Executive Orders from the President of the United States (e.g., National Energy Plan).
- Special reports, studies and comments from federal and state agencies.
- Testimony received at public hearings and meetings on the Michigan Coastal Management Program.
- Certificates, policy statements and solicited opinions issued on specific projects by federal regulatory agencies.
- Statements of national interest issued by federal agencies.

Balancing National Interests

Michigan does not specifically exclude national interests relative to facilities or coastal resources. Through policy statements, as described in Chapters III and V, national interests are balanced in the Coastal Management Program through site specific determinations involving permit procedures, review of environmental impact statements, and lease arrangements, to assure that activities conform to resource carrying capacities and afford protection of coastal resources as mandated by state authorities. Thus, Michigan does not exclude any national interests so long as they conform to substantive requirements of state authorities. This represents a performance approach for assuring proper resource protection and management.

The discussion below summarizes the three major forums which provide for on-going consideration of the national interest relative to facilities and resources: (1) the Michigan Natural Resources Commission; (2) the Michigan Environmental Review Board; and (3) the Michigan Department of Natural Resources. These formally established bodies are directed by state policies to consider all interests in making decisions relative to resource protection and management. The remaining section of this chapter describes more specific national interests with respect to individual resources and facilities and includes a discussion of how the national interest is adequately considered in Michigan's Coastal Management Program.

FORMAL MECHANISMS FOR CONSIDERATION OF THE NATIONAL INTEREST

Michigan Natural Resources Commission

The Natural Resources Commission was established by Act No. 17 of the Public Acts of 1921 to provide policy formulation and program direction for the Department of Natural Resources. Since, as noted earlier, the department is responsible for the significant coastal authorities and programs, the commission's responsibility for making department policy decisions based upon all interests provides for active consideration of the national interest in the Coastal Management Program.

Natural Resources Commission Policy Number 1033 requires that "Openness in government is essential to our democratic institution, and is not subject to question . . . Citizen participation and interest in the activities of the department shall be encouraged in all ways possible. . . Citizen advisory committees shall be used in all cases where programs and activities are particularly sensitive to public opinion or impinge on citizen activities and philosophies in such a way as to cause a substantial response, or an unusually high level of interest." This policy commitment exemplifies the commission's attitude toward encouraging the participation and consideration of all interests in department programs, including the Coastal Management Program.

Several commission actions provide clear evidence of their commitment to considering interests and impacts which transcend Michigan's boundaries and are important to coastal management.

For example, Natural Resources Commission Policy Number 2310 specifically recognizes national energy needs: "Until such time as further developments require a change in policy, or until there is imminent danger of drainage of petroleum from state-owned bottomlands in the Great Lakes, or a *condition of national emergency* requiring greatly increased production efforts, state-owned submerged lands in the Great Lakes will not be available for lease for the exploration, development and production of petroleum. . . Continued attention shall be given by the department to advances in technology of drilling and production of offshore areas, to new knowledge of geological conditions in the petroleum industry. Continued study will be given to the need for an oil and gas lease form, and to possible rules and regulations pertaining to oil and gas leases for the Great Lakes bottomlands, so that the department will be prepared to act if and when it becomes appropriate to do so." (emphasis added)

With respect to the national interest in proper conservation and development of energy resources, Natural Resources Commission Policy Number 1026 recognizes that, "The era of inexpensive energy and seemingly unlimited energy resources is over. For instance, much of the oil and some of the gas supplies upon which the *economy and prosperity of Michigan and the United States* is based, is produced in other nations which can control both prices and production, affecting life styles and values. According to energy experts, coal, nuclear or other sources of energy cannot be expected to replace oil or gas in the near future. The department should be a leader in the wise use of energy and also encourage its employees to be energy conscious in their habits and decisions." (emphasis added)

An even stronger recognition of the department's consideration of national interests is reflected in an environmental impact statement, prepared by the department for potential hydrocarbon development on the Pigeon River Country State Forest. (December 15, 1975)

As conclusively demonstrated from the following excerpt of that impact statement, the Michigan Department of Natural Resources clearly recognizes larger-than-state issues and impacts.

On a national scale, new, large domestic hydrocarbon resources are often found in environmentally sensitive areas subject to extreme natural hazards such as in the North Slope of Alaska or in the Pacific, Gulf and Atlantic coastal waters. At any rate, extraction of oil or gas from Canada or Alaska and not Michigan only displaces the total environmental impact.

Without a specific national plan for energy conservation, it is very difficult to perceive what Michigan's role should be. Even under existing conservation measures, Michigan's high energy consuming products and processes are seriously affected as reflected in our state's high rate of unemployment.

Under any national energy conservation plan, the known hydrocarbon resources on relatively accessible land sites near industrial centers might be exploited first. The energy cost of extracting the hydrocarbons, and

energy cost of transporting it to where it will be used, puts oil and gas resources that are accessible high on the nation's priority list.

Oil from other states is available at a price. The environmental risks in extracting oil from other sources in the United States, especially offshore, are in many cases greater than in the Pigeon River Country State Forest. New large natural gas supplies are not generally available in Michigan at any price, and severe shortages are expected. Natural gas from the Pigeon River Country State Forest cannot be replaced by other gas even if Michigan wished to displace the environmental impact of extraction to other places. With national price controls of interstate natural gas prices, the incentive for exploration and production is missing. Canadian policies regarding exports of hydrocarbons can change at any time.

It is national policy to reduce our dependency on foreign oil. This in turn increases demand on domestic supplies. Through federal controls and pricing schemes, the alternative of foreign oil supply is becoming less available.

In addition, as described in Chapter V, the commission, (as well as the five other department commissions), considers all interests in making decisions relative to contested department decisions or orders (e.g. licensing and permitting, etc.). In accord with the Administrative Procedures Act, a party which is aggrieved by a commission finding relative to a contested case may seek judicial review of the findings in circuit court.

Thus, as described, the Michigan Natural Resources Commission guides Department of Natural Resources policies and actions and has a long-standing commitment to recognize and consider all issues and interest, including the national interest, in their decision making process.

Michigan Environmental Review Board

As described in Chapter V, the Michigan Environmental Review Board (MERB) was established by Executive Order 1974-4 to provide policy recommendations to the Governor on environmental issues and to assist the Governor in the review and formulation of recommendations on federal and state environmental impact statements. Environmental impact statements are required for major state actions that may have a significant impact on the environment or human life. Any interested party, including local governments and citizens may request to MERB to be placed on a mailing list to receive notification of available environmental impact statements for their review. Mailing lists are normally compiled and distributed at least once every month. In making recommendations to the Governor, MERB actively considers all interests. Individuals or groups may make recommendations directly to MERB for their consideration. Specifically, MERB adopted a policy on public participation on October 27, 1975 which states that:

"All public comments, including those considered by INTERCOM, will be forwarded to the Environmental Review Board before it takes final action on an EIS. However, written comments received after the comment deadline may not be distributed to Environmental Review Board members in sufficient time for their consideration. Those who wish to appear before

the Board on an EIS scheduled for Board action may make a brief verbal presentation. Submission of a written copy of the verbal presentation is encouraged, however."

Thus, the Michigan Environmental Review Board provides an open process for considering all interests relative to state or federal environmental impact statements.

Michigan Department of Natural Resources

The Michigan Coastal Management Program, through Department of Natural Resources recommendations to the Natural Resources Commission and department representation on the Michigan Environmental Review Board, as well as close coordination with federal agencies throughout program implementation, will insure that national interests in coastal management are adequately considered. Specifically, Dr. Howard A. Tanner, as chief administrator of the department of Natural Resources has insured that the Department of Natural Resources will continue its consideration of the national interest in facility siting and resource protection in the administration of the department's regulatory and resource management responsibilities. This commitment was formalized by Director's Letter No. 17, dated May 8, 1978 (see Appendix B). The Director's personal involvement with the Natural Resources Commission and the Director's representation on the Michigan Environmental Review Board provide direct access for the department to the primary forums Michigan will use to insure adequate consideration of the national interest.

Powers and duties of the Director, as chief executive of the Department of Natural Resources, are established by Act No. 192 of the Public Acts of 1929. The act requires the Director to provide for the enforcement of all laws and regulations of the state. Administrative Order No. 1976-1 provides that the exercise of a delegated power, duty, or function by the department shall at all times be subject to the general superintendance and supervision of the Director and that the Director shall prescribe and adopt internal procedures stating the course and method of Department operations, (approved November 5, 1976, reviewed and approved by the state Attorney General).

SPECIFIC NATIONAL INTEREST IN MICHIGAN'S COAST

Figure VI-D summarizes resources and facilities in which there is a national interest in planning, siting and other activities relative to coastal management in Michigan. The following discussion summarizes how Michigan's Coastal Management Program, both during program development and as a continuing process during implementation, considers facilities and resources which may be in the national interest.

FIG. VI-D
Michigan's Coastal National Interest Concerns

Category	Examples of Resources and Related Facilities
National Defense and Aerospace	Military bases and installations, defense manufacturing facilities; aerospace facilities
Recreation	Wildlife management areas, national lakeshores, state and national parks, wild and scenic rivers, etc.
Transportation	Commercial ports and harbors, interstate highways, railroads, airports, aids to navigation, coast guard facilities.
Air and Water Quality	Air and water pollution discharges, regional waste treatment plants.
Wetlands	Sensitive habitats critical to fish and wildlife, endangered species habitats
Hazard Areas	Shoreline erosion areas, areas of earth change and sedimentation, flood risk areas
Historic and Archeologic Sites	National and State register of historic sites
Energy	Coastal energy resource areas including energy facility sites, oil and gas rigs, storage distribution and transmission facilities, power plants, and coal facilities

National Defense and Aerospace

Michigan's Coastal Management Program recognizes the importance of national defense and that, such facilities may require uses or impacts on coastal resources. In the event that new or expanded defense facilities are proposed, the Coastal Management Program will not question the need for national security but will strive to evaluate the alternative sites in accord with statutes cited in Chapters III and V of this impact statement, including review of environmental impact statements in accordance with Executive Order of the Governor 1974-4, which created the Michigan Environmental Review Board and the process for distributing and coordinating environmental impact statement review responsibilities.

Recreation

The Michigan coast is a resource of unique beauty which affords numerous opportunities for recreational use. Out-of-state tourism is a major coastal economic consideration.

Recognizing national responsibilities in coastal recreation, the sources consulted by the Coastal Management Program include:

- The nationwide Outdoor Recreation Plan
- State and local recreation programs (e.g., Michigan's Statewide Comprehensive Outdoor Recreation Plan)
- State-federal interagency agreements
- Federal agency nominations for recreational areas of particular concern

Major objectives of the national interest in recreation are: 1) to provide high quality recreational opportunities to all people; 2) increase public recreation in high density areas; 3) improve coordination and management of recreation areas, protect existing recreation areas from adverse contiguous uses; and 4) accelerate the identification of transfer of surplus under-utilized federal property.

Michigan's Coastal Management Program incorporates the national interest in recreation through state consistency with the National Outdoor Recreation Plan, adopted in 1973 (the state's Comprehensive Outdoor Recreation Plan). The Michigan Recreation Plan will continue to be used as the planning process for adequately considering the national interest in recreation.

Other elements incorporated in Michigan's Coastal Management Program include state-federal interagency agreements, such as the agreement between the state and the National Park Service for coordinated wildlife management on Sleeping Bear National Lakeshore.

In addition, Act No. 316 of the Public Acts of 1965, enables the state to: 1) participate in programs of federal assistance relating to outdoor recreation; and 2)

keep an up-to-date comprehensive plan for development of outdoor recreation resources. Thus, the state actively pursues federal financial assistance provisions for outdoor recreation, such as those provided by the Land and Water Conservation Fund. For example, the Department of Natural Resources is currently collaborating with the National Heritage Conservation and Recreation Service to provide increased coastal urban recreation along the Detroit waterfront.

As cited in Chapter III, it is also state policy to improve the accessibility of state land and water resources to the widest range of socio-economic classes consistent with environmental protection and public safety needs, (Michigan Recreation Plan). This policy clearly reflects the national interest in recreation and is enhanced by proposed Coastal Management Program action programs to assist in projecting supply and demand of recreation use, develop programs for meeting projected recreational demands and implementing the coastal access planning element. (Refer also to program concerns, policies and action programs listed under the heading recreation areas.)

Transportation

There is a national interest in maintaining and enhancing the level of commercial navigation on the Great Lakes and in improving the efficiency of the present Great Lakes navigation system. There is also a national interest in providing a safe and efficient land transportation system.

To determine the national interest in transportation, sources consulted by the Coastal Management Program include:

- Federal agency area of particular concern nominations for transportation areas (all 23 commercial ports have been nominated)
- Railway Safety Act of 1970
- Environmental Impact Statements on the extended commercial navigation season and state participation on the Winter Navigation Board
- Activities and development projects conducted by the Department of Commerce's Maritime Administration
- Department of Transportation Act
- Coast Guard, Primary Duties
- Technical studies sponsored by the U.S. Army Corps of Engineers
- National Transportation Plan

The major objectives of the national interest in transportation are: 1) develop national transportation policies and programs conducive to the provisions of fast, safe, efficient and convenient transportation at the lowest cost; 2) to facilitate waterborne activity in support of national, economic, scientific, defense and social needs; 3) to maintain and improve the quality of the water environment; 4) to develop the full potential of the Great Lakes-St. Lawrence Seaway Navigation system, including season extension and maintenance and development of adequate port facilities; 5) to maintain adequate depth of waterways and channels to accommodate vessels active in domestic and international commerce.

Michigan's Coastal Management Program addresses national interests in transportation through: 1) the Governor's conditional support of the extended Great Lakes commercial navigation season; 2) by enabling the creation of port districts; and 3) by providing for enforcement of the substantive requirements of authorities relative to water quality, dredge and fill activities, etc. The Department of Natural Resources coordinates the identification of sites for dredged polluted material through a dredge spoil committee, composed of state as well as federal agency representatives. Other policies and program concerns relative to coastal transportation are contained in Chapter III of this impact statement.

With respect to commercial ports, the Coastal Management Program provided financial assistance to the Michigan Department of State Highways and Transportation to identify land cover and land use for Michigan's ports to facilitate future planning and development of port areas.

Specific concerns of the Coastal Management Program which reflect the national interest in transportation include: 1) to avoid environmental and economic loss, careful planning and analysis is needed to determine the impacts of future port development; and 2) to serve the future needs of development in the coastal area, there is a need to establish a comprehensive transportation planning mechanism.

Air and Water Quality

Protection of air and water quality is necessary to maintain the integrity of Michigan's fragile coastal environment.

Sources consulted by the Coastal Management Program in determining the national interest in air and water quality include:

- Federal Water Pollution Control Act of 1972 and recent amendments.
- Clear Air Act of 1970 and amendments.
- Federal Refuse Act.
- National Solid Waste Act.

- Working agreements between Michigan and the United States Environmental Protection Agency, including specifically the state's "208" program, solid waste, air and water quality programs.
- Area of particular concern nominations relating to air and water quality.

Objectives of the national interest with respect to air and water quality include: 1) provide adequate funds for sewage treatment facilities so that the pollution of our nation's waters can be abated; 2) to control and abate pollution systematically by proper integration of a variety of research, monitoring, standard setting and enforcement activities.

The Michigan Coastal Management Program fully incorporates the national interests in air and water quality, and the requirements of the federal Water Pollution Control Act and Clean Air Act are made part of the Michigan program, including nonpoint sources of water pollution and air pollution. Thus, the water and air national interest will be met during program implementation through the process of issuing state and federal air emission and waste water discharge permits and by incorporating SIPS and 208 plans developed pursuant to the Federal Clean Air and Water Acts.

Wetlands

Michigan's coastal wetlands support many habitats critical to fish and wildlife which are often threatened by development activities. Wetlands also play vital roles as water quality purifiers and retain flood waters.

Sources consulted by the Coastal Management Program to discern national wetlands interests include:

- The Endangered Species Act of 1972.
- President's Executive Order on Wetlands (May 24, 1977).
- Area of particular concern nominations for wetlands, such as those nominations received from the U.S. Fish and Wildlife Service.
- Fish and Wildlife Coordination Act.
- Draft environmental impact statement comments from U.S. National Marine Fisheries Service.

Objectives of the national interest in wetlands include: (1) to avoid to the extent possible the long- and short-term adverse impacts associated with the distribution or modification of wetlands and to avoid direct or indirect support of new construction in wetlands whenever there is a reasonable and prudent alternative; (2) provide means whereby ecosystems upon which endangered and threatened species depend may be preserved; and (3) to provide a program for the conservation of endangered and threatened species.

Through funds provided by the Coastal Management Program, a wetlands value study was conducted to ascertain the values derived from proper wetlands management. As cited in Chapter III, a significant program concern with respect to wetlands is that: actions such as navigation dredging, spoil disposal, marine construction, sanitary landfills, construction of recreational facilities, intense urbanization, drainage and other actions have resulted in habitat loss in many wetland areas. Continued review and regulation of such actions is necessary to avoid unnecessary and unretrievable losses in ecologically sensitive coastal wetlands.

Under authority of Act No. 245 of the Public Acts of 1970, as amended, the Shorelands Protection and Management Act, environmental areas critical to fish and wildlife are identified and regulated by management plan. The Michigan Environmental Protection Act may also be employed to protect wetlands. Through this authority, coastal wetlands may be properly managed, consistent with the national interest. The state is currently seeking wetlands legislation which would provide comprehensive wetlands management.

Hazard Areas

Shoreland erosion and flooding annually results in excessive damage costs to structures and property. Soil by volume is our greatest pollutant.

In discerning the national interest in such hazard areas, sources consulted by the Coastal Management Program include:

- Flood Disaster Protection Act
- National Flood Insurance Act of 1968 and 1973 amendments
- Water Resources Development Planning Act of 1974
- The President's Executive Order on Flood Plain Management (May 24, 1977)
- Erosion and flood hazard areas of particular concern.

Objectives of the national interest in hazard areas include: (1) to avoid long- and short-term adverse impacts associated with the occupancy and modification of floodplains; (2) to develop and carry out a national soil and water conserva-

tion program; and (3) to designate areas eligible for floodplain insurance, including the erosion aspects of 1973 amendments.

Michigan addresses these national interests in implementing provisions of Act No. 245 of the Public Acts of 1970 which provides for the designation and regulation of flood and erosion areas along the coast. Act 347 of the Public Acts of 1972 provides for control of soil erosion and sedimentation resulting from earth change activities. A goal of the Coastal Management Program which complements national interest concerns includes: encourage the management of properties so as to minimize environmental and property damage resulting from natural and man-induced erosion and flooding. In addition, the Department of Natural Resources is currently working with the Department of Housing and Urban Development to identify erosion hazard areas for federal agency use in determining acceptable insurance premiums. Department of Natural Resources is frequently consulted by federal agencies such as the Flood Insurance Administration on matters relative to delineating and regulating hazard areas.

Archaeological and Historic Sites

Michigan's coast is a rich chronicle of the state's development. Heavy concentrations of records and artifacts of the state's 13,000 year history are located along the Great Lakes coast.

In determining the national interest in archaeological and historic areas, sources consulted by the Coastal Management Program include:

- The Antiquities Act of 1906
- Historic Sites Act of 1935
- Archaeological and Historic Preservation Act of 1974
- National Historic Preservation Act of 1974
- National Environmental Policy Act of 1969
- Federal agency nominations for historic and archaeological areas of particular concern
- Executive Order 11593

Major objectives of the national interest in historic and archaeological sites are: 1) to afford protection for designated historic and archaeological sites from adverse impacts; and 2) to consider cultural resources in assessing the environmental impacts of proposed activities.

Elements of Michigan's Coastal Management Program which apply to the national interest include provisions of Act No. 169 of the Public Acts of 1970 which

encourages the establishment of historic districts and provides for: 1) acquisition of land and structures for historic purposes; 2) preservation of historic sites and structures; 3) creation of historic district commissions; and 4) maintenance of publicly owned historic sites and structures by local governmental units.

It is also state policy to maintain a state register of historic sites which may involve state agencies in environmental review procedures, (Act No. 10 of the Public Acts of 1955 and Executive Order of the Governor 1974-4). The Director of the Michigan History Division, Department of State, acts as State Historic Preservation Officer, authorized under the National Historic Preservation Act of 1966. Michigan's State Historic Preservation Officer has formally indicated approval of program policies related to historic and archaeological areas, (February 24, 1978 Appendix C). (See also Chapter III under the heading historic and archaeological areas.)

The Coastal Management Program has also provided grant funds to the Michigan History Division, Department of State, to conduct studies which clearly reflect the national interest. For example, the two reports entitled: "The Distribution and Abundance of Archaeological Sites in the Coastal Zone of Michigan", and "Coastal Zone Management Program Historic Properties" assisted the state in identifying historic and archaeological resources for their protection and maintenance.

A specific concern of the Coastal Management Program which reflects the national interest is: To avoid program duplication and conflict, historic planning in Michigan's coastal areas should be consistent with provisions of the *Michigan Historic Preservation Plan*.

Energy Resource Areas

Expanding energy resource supplies to meet increasing domestic and industrial needs will place new demands on the lands and waters along the nation's shores.

To determine the national interest in energy resources, sources consulted by the Coastal Management Program include:

- The National Energy Plan
- Federal Power Act
- Natural Gas Act
- Data supplied by the U.S. Geological Survey
- Data supplied by the East Central Area Reliability Commission
- Area of particular concern nominations for energy resource areas

The National Energy Plan sets forth three energy objectives for the United States: 1) as an immediate objective that will become even more important in the future, to reduce dependence on foreign oil and vulnerability to supply interruptions; 2) in the medium term, to keep U.S. imports sufficiently low to weather the period when world oil production approaches its capacity limitations; and 3) in the long-term, to have renewable and essential inexhaustible sources of energy for sustained economic growth, (Plan Overview p. ix). Significant features of the National Energy Plan are: 1) conservation and fuel efficiency; 2) national pricing and production policies; 3) reasonable certainty and stability in government policies; 4) substitution of abundant energy resources for those in short supply; and 5) development of non-conventional technologies for the future. (Plan Overview p. ix-x).

As documented in earlier portions of this section, Michigan has demonstrated its consideration of the national interest in energy, particularly through formal policy statements of the Natural Resources Commission and authorities and programs administered by the Michigan Department of Natural Resources. Specific concerns, policies and action programs, described in this impact statement in Chapter III, provide additional indication of Michigan's commitment to recognize larger-than-Michigan issues relative to energy conservation and development.

With specific reference to planning for the siting of energy facilities, Michigan is actively engaged in meeting the requirements of Section 305(b)(8) of the Coastal Zone Management Act. The Coastal Management Program is currently working to document supplies, demands and plans related to energy and their impacts on the coastal area. This planning effort is coordinated among several state agencies, such as the Department of Commerce's Energy Administration and federal interests, public and private groups involved with development and/or conservation of energy, and will specifically examine the national interest in energy in executive policies, federal laws and regulations, plans, programs and policies, and federal agency statements of national energy interest in Michigan's coast.

SUMMARY

Michigan's effort to coordinate and consult with federal agencies and other national interests will continue during program implementation. During program development, the coordination effort strengthened Michigan's Coastal Management Program through recognition of federal agency program concerns and missions and area of particular concern nominations. Through local, state and federal involvement, Michigan's Coastal Management Program can assist in developing and conserving Michigan's unique 3,200 mile shore, consistent with the health, safety and welfare of present and future generations.

Conclusion

This document is the culmination of a three year effort by the Michigan Department of Natural Resources, the Citizens Shorelands Advisory Council, coastal planning and development regional agencies, local governments and citizens to develop a Coastal Management Program for the people of Michigan.

Benefits of this program will continue to be illustrated by improved administration of coastal statutes, more effective technical assistance, increased financial assistance and beneficial local, state and federal coordination efforts. In accomplishing these benefits, the major program objective will be to protect essential coastal resources and increase the capabilities of local governments to properly manage their coastal areas.

In anticipation of federal approval of this program, the Michigan Coastal Management Program has requested proposals for funding consideration under Section 306 of the Coastal Zone Management Act from all coastal local governmental units, planning and development regional agencies and state agencies. To date, about 130 proposals from local and regional entities have been submitted, requesting more than \$3.5 million. Thirty-two proposals have been received from state agencies, requesting about \$2.1 million. The Standing Committee on Shorelands and Water Coordination, the Citizens Shorelands Advisory Council and participating regional agencies have begun to review project proposals to assist in identifying technical and financial assistance priorities. Some federal agencies, such as the U.S. Corps of Engineers and the U.S. Fish and Wildlife Service have been consulted and provided information on proposed projects relating to shore protection, wetlands inventories and others.

Thus the Michigan Coastal Management Program is taking active steps to insure that program implementation is a successful and meaningful endeavor. In closing, we would like to recognize the contributions of the Division of Land Resource Programs — particularly the Great Lakes Shorelands Section — and members of the Standing Committee on Shorelands and Water Coordination and the Citizens Shorelands Advisory Council. Special thanks to Janet Griffin who afforded hours of patience and hard work in collaborating in the development of this impact statement and the program as a whole.