

Additional State Examples

North Carolina – *State ex rel. Rorher v. Credle*, 322 N.C. 522 (1988)

- “Navigable waters, then, are subject to the public trust doctrine, insofar as this Court has held that where the waters covering land are navigable in law, those lands are held in trust by the State for the benefit of the public. A land grant in fee embracing such submerged lands is void.”
- “[T]he benefit and enjoyment of North Carolina’s submerged lands is available to all its citizens, subject to reasonable legislative regulation, for navigation, fishing and commerce.”

Oregon – *Chernaik v. Brown*, 367 Or. 143 (2020)

- “[T]he public trust doctrine is not fixed but is capable of change and expansion. The public trust doctrine has evolved from its original narrow conception, when it applied only to lands underlying waters subject to the ebb and flow of the tide. And although the expansions relate to different aspects of the public trust doctrine (protected resources, protected uses, and government actors), they all resulted from disputes involving a specific body of water and furthered the primary purpose of the doctrine—protecting the public's right to use navigable waters for fishing and navigation.”