STATE OF MICHIGAN
DEPARTMENT OF
LIFELONG EDUCATION, ADVANCEMENT, AND POTENTIAL
LANSING

GRETCHEN WHITMER
GOVERNOR

BEVERLY WALKER-GRIFFEA, Ph.D.
DIRECTOR

August 1, 2025

Ethan Jacobs
Eaton County Parks
133 Fitzgerald Park Drive
Grand Ledge, MI 48837

RE: License #: SD230403051
Investigation #: 2025C0458001
Lincoln Brick Park

Dear Camp Administrator:

Attached is the Special Investigation Report for the above-mentioned facility. Due to the violations identified in the report, a written corrective action plan is required. The corrective action plan is due 15 days from the date of this letter and must include the following:

- How compliance with each rule will be achieved.
- Who is directly responsible for implementing the corrective action for each violation.
- Specific time frames for each violation as to when the correction will be completed or implemented.
- How continuing compliance will be maintained once compliance is achieved.
- The signature of the responsible party and a date.

If you desire technical assistance in addressing these issues, please feel free to contact me. In any event, the corrective action plan is due within 15 days. Failure to submit an acceptable corrective action plan will result in disciplinary action.

Please review the enclosed documentation for accuracy and contact me with any questions. If I am not available and you need to speak to someone immediately, please contact the licensing unit at 517-284-9730.

Sincerely,

Kristen Goodman

Kristen Goodman, Licensing Consultant
Camp Licensing Unit
105 W. Allegan St.
Lansing, MI 48933
517-648-6164
enclosure

MICHIGAN DEPARTMENT OF
LIFELONG EDUCATION, ADVANCEMENT, AND POTENTIAL
CAMP LICENSING UNIT
SPECIAL INVESTIGATION REPORT

I. IDENTIFYING INFORMATION

License #:	SD230403051
Investigation #:	2025C0458001
Complaint Receipt Date:	06/16/2025
Investigation Initiation Date:	06/18/2025
Report Due Date:	08/15/2025
Licensee Name:	Eaton County Parks
Licensee Address:	133 Fitzgerald Park Drive Grand Ledge, MI 48837
Licensee Telephone #:	517-627-7351
Administrator:	Ethan Jacobs
Name of Facility:	Lincoln Brick Park
Facility Address:	13991 Tallman Road Grand Ledge, MI 48837
Facility Telephone #:	517-627-7351
Original Issuance Date:	05/13/2020
License Status:	REGULAR
Effective Date:	09/06/2023
Expiration Date:	09/05/2025
Capacity:	60
Program Type:	CAMP SITE - DAY

II. ALLEGATION(S)

	Violation Established?
Campers were allowed to swim without a lifeguard.	Yes
Lifesaving equipment was not present while campers were swimming.	Yes

III. METHODOLOGY

06/16/2025	Special Investigation Intake 2025C0458001
06/18/2025	Special Investigation Initiated - On Site
07/18/2025	Inspection Completed-BCAL Sub Compliance
08/01/2025	Exit conference
08/16/2025	Corrective Action Plan Requested and due on

ALLEGATION:

Campers were allowed to swim without a lifeguard.

INVESTIGATION:

On 06/16/25, the Camp Licensing Unit received a licensing complaint. The complaint read:

> *"Campers were taken swimming in a pond without any certified lifeguards or lifesaving equipment present."*

On 06/18/25, camp licensing consultant Jarrah Buch-Price and I interviewed deputy director/naturalist Ethan Jacobs at the camp. He stated that he returned on 06/16/25 from paternity leave and was approached by administrative assistant Melody Smalley expressing concerns about campers going swimming on 6/12/25 on their field trip to Fox Memorial Park. Mr. Jacobs stated that they had not previously taken campers swimming because of additional licensing requirements and was unaware of the plan to take campers swimming at the time of the field trip. Mr. Jacobs is familiar with the park and its pond used for swimming. He described the swimming area as a manmade pond with a pump used to maintain the water level. Mr. Jacobs stated that the water height was no deeper than chest high. Mr. Jacobs noted that Staff Member 1 (SM 1) was a lifeguard, but that he was not 100% certain if his lifeguard certification was current.

On 06/18/25, Jarrah Buch-Price and I interviewed recreation and event coordinator Clara Alderman at the camp. Ms. Alderman explained that she was responsible for the coordination of the field trip. Ms. Alderman stated that 15 of the 19 campers swam during the fieldtrip. Ms. Alderman stated that SM 1 was a lifeguard, but she did not believe his certification was renewed. Ms. Alderman noted that herself or another staff member were in the swim area with campers at all times during the activity, and that all campers swam only in the roped off area. Ms. Alderman explained that visual checks were conducted for all campers while swimming, but not within 10-minute intervals. Ms. Alderman stated the water height of the pond to be 3 feet or less. Ms. Alderman noted no further field trips offering swimming are scheduled for this summer or in the future.

On 6/18/25, Jarrah Buch-Price and I visited the Fox Memorial Park site at 3979 E. Gresham Highway, Potterville, Michigan, to view the swimming area. Our observations confirmed Mr. Jacob's and Ms. Alderman's description of the site.

On 07/18/2025, I interviewed administrative assistant Melody Smalley by telephone. She stated that she did not speak with Ms. Alderman prior to the field trip to Fox Memorial Park. Ms. Smalley explained that she does not know where the camp is going at any given time unless she receives a credit card request or invoice for a trip. Ms. Smalley stated that she does not recall speaking with Mr. Jacobs about the Fox Memorial Park fieldtrip when he returned from paternity leave, but she does recall Ben Youngs the park operations supervisor mentioning that his daughters were on the trip and received quite a sunburn while they were swimming. Ms. Smalley suggested that Mr. Jacobs may have heard about the trip from Mr. Youngs, since they are in frequent communication.

APPLICABLE RULE	
R 400.11405	**Certified aquatic supervisor.**
	(1) A camp shall have a certified aquatic supervisor who is an adult on duty. The aquatic supervisor shall be responsible for the enforcement of safety rules and procedures governing all aquatic activity. This adult shall be present during all aquatic activity.
ANALYSIS:	Interviews with staff revealed that certified lifeguards were not present while campers were swimming.
CONCLUSION:	**VIOLATION ESTABLISHED**

ALLEGATION:

Lifesaving equipment was not present while campers were swimming.

INVESTIGATION:

Mr. Jacobs stated that Ms. Alderman is required to carry all camper records as well as a first aid kit, but that there was no aquatic life saving equipment that he knew of. Mr. Jacobs noted that they may have lifesaving equipment in the maintenance shed. Mr. Jacobs stated that there is a boat onsite for buoy placement because Fox Memorial Park is a public swimming area.

Ms. Alderman stated that the camp had arm floaties on hand if campers were not strong swimmers. Ms. Alderman also stated that parents were directed to provide PDFs if their camper(s) were not strong swimmers. Ms. Alderman also noted that a first aid kit was available onsite.

During the onsite at Fox Memorial Park swimming area, we noted that Fox Memorial Park is maintained by Eaton County Parks. The site had a sign posted stating that swimming was to be conducted at the swimmer's own risk. Buoys were placed outlining the edges of the swimming area, but no connecting line was placed closing off the swimming area. No lifesaving equipment was seen present or accessible at the time of our visit.

APPLICABLE RULE	
R 400.11409	**Swimming area; lifesaving equipment.**
	(2) A camp shall provide lifesaving equipment at each permanent swimming area and shall place the equipment so that it is immediately available in case of an emergency. At a minimum, the equipment shall include all of the following: **(a) A whistle or other audible signal device for each staff person on duty.** **(b) An assist pole or other appropriate reaching assist device.** **(c) A ring buoy or other appropriate throwing assist device that has a rope attached that is of sufficient length for the area.** **(d) A backboard with a minimum of 3 straps.** **(e) A first-aid kit.** **(f) A rescue tube.**

ANALYSIS:	Interviews with staff and a site visit revealed that no lifesaving equipment was present.
CONCLUSION:	**VIOLATION ESTABLISHED**

I shared the findings with license designee Ethan Jacobs and administrator Clara Alderman by Microsoft Teams on 08/01/25. Clara stated that she understood the findings of the investigation and appreciated our assistance to better understand licensing.

IV. RECOMMENDATION

Upon receipt of an acceptable corrective action plan, I recommend the status of the license remains unchanged.

Kristen Goodman 7/18/2025
Kristen Goodman Date
Licensing Consultant

Approved By:

D. S. Ramsey 7/22/2025
Deondra S. Ramsey Date
Out-of-School Time Learning and Camp
Licensing Manger