

**EAGLE TOWNSHIP
EAGLE TOWNSHIP HALL
14318 MICHIGAN ST
EAGLE, MI 48822**

**TOWNSHIP BOARD MEETING AGENDA
September 15, 2026 at 6:00 pm**

Call to Order: _____ p.m. – Pledge of Allegiance

Members Present: Briggs-Dudley _____, C. Hoppes _____, Stroud _____, Currie _____, M. Hoppes _____,

Citizen's Comments (Items not on the agenda)

Consent Agenda:

1. Financials
Fiscal Year End: March 31, 2026 Balance sheet, Expense & Revenue
August 2026 Financials: Balance Sheet, Expenses, Cash Summary
2. Communications
Delta Township Adoption of Master Plan

Agenda Approval:

A. Reports

1. County Commissioner Report
2. LGRFA Report
3. Eagle Township Planning Commission Report
4. Code Enforcement Report
5. Board Members Reports

B. Accounts Payable:

1. Bill Payment List

C. Planning and Zoning Requests

1. Permanent Zoning Ordinance timeline

D. Old Business:

1. LEAP Grant for Hall Updates
2. Septic Tank/Camera approval
3. Public Safety Revenue Sharing
4. Survey for Michigan Street property
5. Consumers Energy Gas Franchise Ordinance
6. PFAS update

E. New Business:

1. Minutes from August 18, 2026
2. Portland Recreation Request
3. Media Policy Revisions
4. SCCMUA draft agreement
5. Eagle Park

F. Citizens Comments

G. Adjourn (time) _____ p.m.

Next Eagle Township Board Meeting will be Tuesday, October 20, 2026, at 6 pm

If you wish to address the Board, please begin by stating your name and address. Also, please limit your comments to 3 minutes...thank you.
--

Supervisor Fonda J. Brewer
Clerk Mary R. Clark
Treasurer Dennis R. Fedewa
Manager Brian T. Reed



Trustee Elizabeth S. Bowen
Trustee Andrea M. Cascarilla
Trustee Karen J. Mojica
Trustee Joshua I. Lyman

Planning Department

(517) 323-8560

September 1, 2026

**RE: Notice of Master Plan adoption
Delta Township Planning Commission, Delta Township, Michigan**

At its meeting on August 17, 2026, the Delta Township Board of Trustees voted to adopt the 2026 Delta Township Master Plan. In accordance with the Michigan Planning Enabling Act (Public Act 33 of 2008), when a township adopts a new master plan or update to an adopted plan, it must notify by first class mail or personal delivery the following parties: the planning commission or elected body of any local unit of government located within or contiguous to the township; the regional planning commission; any public utility company, railroad company, and public transportation agency operating within the local unit of government; and any government entity that registers its name to be notified. You are receiving this notice to comply with that requirement.

The adopted 2026 Master Plan is available for review on the Delta Township website at www.deltami.gov. If you have questions or would like more information about the adopted plan, please contact Delta Township Planning & Economic Development Director Peter Menser at pmenser@deltami.gov or 517.816.8275.

Eagle Township IZO to ZO Timeline

To successfully transition Eagle Township's Interim Zoning Ordinance (IZO) to a permanent, final Zoning Ordinance under the Michigan Zoning Enabling Act (MZEA), Public Act 110 of 2006, you must follow a strict statutory process.

Because a true "Interim Ordinance" operates under a compressed adoption path with a strict statutory expiration date (MCL 125.3404), transitioning to a permanent text requires treating the draft as a new, comprehensive permanent zoning ordinance adoption under the MZEA to ensure it stands up to judicial scrutiny.

The legally synchronized, step-by-step timeline and procedural roadmap to meet your deadlines follow.

Step-by-Step Transition & Publication Roadmap

Phase 1: Drafting, Clean Copy, and Motion to McKenna to finalize clean copy.

- **Target Date: September 1, 2026**
- **Action Items:** Have McKenna assemble the most up-to-date interim text, incorporating all previous items discussed and item covered on September 1, 2026, PC special meeting.
- The Planning Commission passed two motions tonight that require immediate action from McKenna to draft and send notices for a public hearing to be held on September 29th. Below is a copy of the motion passed by the Planning Commission on September 1, 2026.
 - Currie moved to approve the formal public hearing notice for the proposed permanent zoning ordinance and to direct McKenna to publish the notice in a newspaper of general circulation within Eagle Township and to complete all required mailings no later than September 4, 2026 in fulfillment of the statutory 15-day notice requirements for the September 29, 2026 public hearing. Motion by Currie, seconded by Rich. Voice vote: All in favor. Motion carried.
- The other urgent item is to finalize the proposed permanent zoning ordinance by September 11th for publication on the township website and copy of the motion passed by the Planning Commission on September 1, 2026.

- Currie moved to direct McKenna to incorporate the revisions already submitted and revisions agreed upon at tonight's meeting into a clean draft of the proposed permanent zoning ordinance and to authorize staff to publish that draft to the Township website by September 11, 2026, for public review in anticipation of the September 29, 2026, public hearing. Motion by Currie, seconded by Sutherland. Voice vote: All in favor. Motion carried.

Phase 2: Public Notice Publication

- **Target Windows: September 2, 2026 – September 4, 2026**
- **Action Items:** Publish the official "Notice of Public Hearing" in a newspaper of general circulation within Eagle Township.
- **Statutory Compliance (MCL 125.3103):**
 - Michigan law dictates that public hearing notices must be published not less than 15 days before the scheduled hearing.
 - Publishing between September 3rd (26 days prior) and September 4th (25 days prior) safely clears this 15-day minimum window.
- **Notice Content Requirements:** The notice must explicitly state the time, date, and location of the September 29th Planning Commission meeting. It must summarize the ordinance's intent, state where the full text can be inspected, and outline how citizens can submit written comments.
- **Special Notice Mailings:** On or before the publication date, the McKenna must mail individual notices to all registered public utilities, railroads, and airport managers operating in the zoning jurisdiction (MCL 125.3306(2)).

Phase 3: Public Accessibility & Digital Publication

- **Target Date: September 11, 2026**
- **Action Items:** Publish the final, clean public-review draft of the zoning ordinance text and maps onto the Eagle Township Official Website.
- **Best Practice:** Ensure physical copies are simultaneously placed at the Township Hall for residents who lack reliable internet access, ensuring absolute transparency heading into the hearing.
- **Legal Review:** The attorney must verify that the administrative, enforcement, and Zoning Board of Appeals (ZBA) clauses conform perfectly with permanent ordinance criteria outlined in MCL 125.3305 and MCL 125.3601. This section should be unchanged and meet all legal requirements.
 - Have McKenna email entire clean public-review draft of IZO to lawyer.

- Have lawyer review IZO sections; requesting through supervisor
 - Data Centers
 - Article 14 Procedures and Processes
 - Article 7 non-conformities (if time allows, not as crucial)

Phase 4: Planning Commission Public Hearing

- **Target Date: September 29, 2026** (Regular Scheduled Meeting)
- **Action Items:** The Planning Commission formally opens the floor to public comment.
- **Procedural Flow:**
 1. Open the public hearing and take verbal and written testimony.
 2. Close the public hearing.
 3. Review the draft, making minor text clarifications or factual corrections on the record based on public input.
 4. **The Vote:** If no substantial structural overhauls are required, the Planning Commission votes by resolution to forward a formal recommendation of approval, along with a summary of public comments, to the Eagle Township Board of Trustees (MCL 125.3308). Resolution would be best practice and Rob to check Planning Commission bylaws.
 5. **Legal Review:** If needed, send to lawyer if there are any major changes to text or maps.

Phase 5: County Coordination Submission

- **Target Window: September 30, 2026**
- **Action Items:** McKenna submit the zoning ordinance draft and proposed maps to the Clinton County Planning Commission / Coordinating Zoning Committee.
- **Statutory Compliance (MCL 125.3307):** Township zoning acts must be submitted to the county for coordination review. The county's review is focused strictly on conflicting boundaries or regional crossovers.
- **Timing Rule:** The county has 30 days to issue a recommendation to the Township. If they fail to respond within 30 days of submission, the township may legally proceed assuming county approval.

Phase 6: Final Board Action & Adoption

- **Target Window: November 17, 2026** (Next Scheduled Township Board Meeting)
- **Action Items:** The Eagle Township Board of Trustees reviews the Planning Commission's transmission package.
- **Statutory Compliance (MCL 125.3401):** The Township Board may adopt the ordinance by a standard majority vote. If the Board introduces substantial changes of its own to the text, it *must* refer those revisions back to the Planning Commission for a report before voting.

Phase 7: Post-Adoption Filing & Effective Date Notice

- **Target Window: Within 15 days after Township Board Adoption**
- **Action Items:**
 1. File the adopted ordinance with the Township Clerk.
 2. Publish a "Notice of Adoption" in the newspaper within 15 days of the vote (MCL 125.3401(1)). This notice must include either the full text of the ordinance or a comprehensive summary detailing its effective date.
 3. Update the permanent text on the township website.

Rough Draft Public Notice

NOTICE OF PUBLIC HEARING

EAGLE TOWNSHIP PLANNING COMMISSION

PROPOSED PERMANENT ZONING ORDINANCE ADOPTION

TO: THE RESIDENTS AND PROPERTY OWNERS OF EAGLE TOWNSHIP, CLINTON COUNTY, MICHIGAN, AND ALL OTHER INTERESTED PARTIES.

PLEASE TAKE NOTICE that the Eagle Township Planning Commission will hold a public hearing on **Tuesday, September 29, 2026, at 7:00 p.m.** at the Eagle Township Hall at 14318 Michigan Street, Eagle, Michigan 48822, during its regularly scheduled meeting.

THE PURPOSE OF THE PUBLIC HEARING is to receive public comment, testimony, and review written submissions regarding the proposed adoption of a comprehensive, permanent Eagle Township Zoning Ordinance. This proposed ordinance is intended to transition, update, and replace the existing Interim Zoning Ordinance (IZO).

SUMMARY OF THE PROPOSED ZONING ORDINANCE:

The proposed permanent Zoning Ordinance is established under the authority of the Michigan Zoning Enabling Act (Public Act 110 of 2006, as amended, MCL 125.3101 et seq.). The ordinance regulates the use and development of land within Eagle Township to

promote the public health, safety, and general welfare. The proposed ordinance contains provisions concerning:

1. **Zoning Districts & Boundaries:** Establishment of agricultural, residential, commercial, industrial, and special use zoning districts, including the official Eagle Township Zoning Map.
2. **Land Use Regulations:** Permitted uses, special land uses, and prohibited uses within each distinct zoning district.
3. **Dimensional Standards:** Regulations governing lot sizes, setbacks, building heights, yard requirements, and maximum lot coverage.
4. **Site Development Standards:** General provisions regulating parking, signs, landscaping, environmental protection, access management, and infrastructure constraints.
5. **Administration and Enforcement:** Procedures for site plan review, special land use permits, variances, amendments, nonconforming uses, violations, penalties, and the establishment, duties, and powers of the Zoning Board of Appeals (ZBA) and the Zoning Administrator.

PUBLIC INSPECTION OF THE DRAFT:

A complete, clean copy of the proposed text and maps will be available for public inspection starting September 11, 2026, on the official Eagle Township website at eagletownshipmi.gov. Physical copies may also be reviewed during regular business hours at the Eagle Township Hall.

PUBLIC COMMENT PROCEDURES:

All interested persons are invited to attend this hearing and express their views. Written comments concerning the proposed permanent Zoning Ordinance will be received by the Zoning Administrator, McKenna via mail at **[Insert McKenna Mailing Address]**, or via email at **[Insert McKenna Email]**, from the date of this notice until 5:00 p.m. on September 29, 2026. Written comments received before the hearing will be entered into the official record.

Eagle Township will provide necessary reasonable auxiliary aids and services to individuals with disabilities at the meeting upon **[How many days 4]** days' notice to the Township Clerk.

FY 2026 Public Safety Revenue Sharing (PSRS) Frequently Asked Questions (FAQ)

General Program Information (New Funding; Ongoing; Supplanting)

1. Is the Public Safety Revenue Sharing (PSRS) funding new in fiscal year 2026?

Yes, PSRS is new in fiscal year 2026. The Legislature appropriated the following:

Local Unit Type	Ongoing Funding Amount	One Time Funding Amount	Total Funding Amount
Cities, Villages, and Townships	\$35,062,500	\$7,500,000	\$42,562,500
Counties	\$11,687,500	\$2,500,000	\$14,187,500

2. When is Public Safety Revenue Sharing (PSRS) funding distributed?

PSRS funding is distributed as a single distribution.

For fiscal year 2026, city, village, and township PSRS funding was distributed in May 2026, and county PSRS funding was distributed in June 2026.

3. Do local units have to opt-in or apply to receive Public Safety Revenue Sharing (PSRS) funding?

No. Cities, villages, townships, and counties do not need to opt-in or apply to receive PSRS funding. Fiscal year 2026 PSRS funding was distributed to cities, villages, and townships in May 2026, and to counties in June 2026.

4. Will Public Safety Revenue Sharing (PSRS) funding be paid in future years?

Funding is provided through the annual appropriation process. Funding was approved as part of the fiscal year 2027 budget process. Future funding is dependent on decisions made by the Legislature.

5. Does the Public Safety Revenue Sharing Program (PSRS) permit supplanting?

The fiscal year 2026 appropriation act ([2025 Public Act 22, Section 959](#)) does not specify if supplanting is or is not permitted. Responsibility for ensuring that the PSRS funding is used in compliance with the law rests with each local unit of government.

FY 2026 Public Safety Revenue Sharing (PSRS) Frequently Asked Questions (FAQ)

Requirements

- 1. Are there specific requirements for the use of the Public Safety Revenue Sharing (PSRS) funds?**

Yes. Local units of government must use the PSRS funding only for operational and capital expenditures that serve the purposes of public safety. Specific requirements are in the fiscal year 2026 appropriation act ([2025 Public Act 22, Section 959](#)).

75% Requirement

- 1. My local unit of government (local unit) does not maintain a police department. Law enforcement services are provided to the local unit by the County Sheriff's Office. Could 75% of the Public Safety Revenue Sharing (PSRS) funding be subgranted to the County Sheriff's Office?**

Yes. Per [2025 Public Act 22, Section 959](#), local units may subgrant all or part of their PSRS funding to another governmental entity as long as the PSRS funding is used to fund a law enforcement agency or law enforcement officers as defined in [MCL 28.602](#), and is used in compliance with [2025 Public Act 22, Section 959](#).

- 2. My local unit of government (local unit) does not maintain a police department or employ law enforcement officers. How can the local unit use 75% of the Public Safety Revenue Sharing (PSRS) funding?**

Per [2025 Public Act 22, Section 959](#), at least 75% of the PSRS funding must be used to fund a law enforcement agency or law enforcement officers, as defined in [MCL 28.602](#). Local units may subgrant all or part of their PSRS funding to another governmental entity as long as the subgranted PSRS funding is used to fund a law enforcement agency or law enforcement officers as defined in [MCL 28.602](#), and is used in compliance with [2025 Public Act 22, Section 959](#).

- 3. My local unit of government (local unit) does not maintain a law enforcement agency or have law enforcement officers. Can the local unit use all of the Public Safety Revenue Sharing (PSRS) funding for other non-law-enforcement related public safety purposes?**

No. Per [2025 Public Act 22, Section 959](#), at least 75% of the PSRS funding must be used to fund a law enforcement agency or law enforcement officers, as defined in [MCL 28.602](#). Local units may subgrant all or part of their PSRS funding to another governmental entity as long as the subgranted PSRS funding is used to fund a law enforcement agency or law enforcement officers as defined in [MCL 28.602](#), and is used in compliance with [2025 Public Act 22, Section 959](#).

FY 2026 Public Safety Revenue Sharing (PSRS) Frequently Asked Questions (FAQ)

- 4. Can Public Safety Revenue Sharing (PSRS) funding be used to purchase items such as pepperball guns, tasers, Crime Stoppers Services, security windows; or fund Ordinance Officers, School Resource Officers, Zoning Enforcement Officers, Rental/Building Inspectors, or Fire Marshals?**

PSRS funding provided to local units of government (local units) pursuant to [2025 Public Act 22, Section 959](#) must be used for the purposes described in the statute. See [Public Safety Revenue Sharing](#) (<https://www.michigan.gov/treasury/local/share/public-safety-revenue-sharing>) for more information. There is no list of specific items that do or do not qualify, except for the items mentioned in the statute (such as facial recognition technology). Responsibility for ensuring that the PSRS funding is used in compliance with the law rests with each local unit, subject to normal financial and operational review procedures.

- 5. Can the 75% Public Safety Revenue Sharing (PSRS) funding be used to contract alternative or co-responders, or crisis response teams?**

PSRS funding provided to local units of government (local units) pursuant to [2025 Public Act 22, Section 959](#) must be used for the purposes described in the statute. See [Public Safety Revenue Sharing](#) (<https://www.michigan.gov/treasury/local/share/public-safety-revenue-sharing>) for more information. There is no list of specific items that do or do not qualify, except for the items mentioned in the statute (such as facial recognition technology). Responsibility for ensuring that the PSRS funding is used in compliance with the law rests with each local unit, subject to normal financial and operational review procedures.

25% Requirement

- 1. Can Public Safety Revenue Sharing (PSRS) funding be used to purchase fencing/landscaping as visual barriers related to traffic calming or AED devices?**

PSRS funding provided to local units of government (local units) pursuant to [2025 Public Act 22, Section 959](#) must be used for the purposes described in the statute. See [Public Safety Revenue Sharing](#) (<https://www.michigan.gov/treasury/local/share/public-safety-revenue-sharing>) for more information. There is no list of specific items that do or do not qualify, except for the items mentioned in the statute (such as facial recognition technology). Responsibility for ensuring that the PSRS funding is used in compliance with the law rests with each local unit, subject to normal financial and operational review procedures.

FY 2026 Public Safety Revenue Sharing (PSRS) Frequently Asked Questions (FAQ)

Reporting

- 1. Do local units of government (local units) have any reporting requirements related to the Public Safety Revenue Sharing (PSRS) funding?**

The fiscal year 2026 appropriation act ([2025 Public Act 22, Section 959](#)) does not specifically have any PSRS reporting requirements. Responsibility for ensuring that the PSRS funding is used in compliance with the law rests with each local unit.

- 2. If Public Safety Revenue Sharing (PSRS) funding is subgranted, are there any reporting requirements?**

The fiscal year 2026 appropriation act ([2025 Public Act 22, Section 959](#)) does not specifically have any PSRS reporting requirements. Responsibility for ensuring that PSRS funding is used in compliance with the law rests with each local unit.

Accounting for Funds

- 1. Which account should be used by the initial local unit of government (local unit) that receives the Public Safety Revenue Sharing (PSRS) funding from the state?**

Local units can record PSRS funding as follows:

- Debit – Cash
- Credit - Revenue account number 543 (State Grants - Public Safety)

- 2. If a local unit of government (local unit) is not going to spend the Public Safety Revenue Sharing (PSRS) funds by the end of the fiscal year, should the local unit record the PSRS funds in a special fund?**

A special revenue fund may be used to record the PSRS funds, however the local unit is not precluded from using the General Fund as long as the local unit is able to keep the PSRS funds appropriately separated.

- 3. How should a local unit of government (local unit) account for subgranting the Public Safety Revenue Sharing (PSRS) funding?**

When the initial local unit subgrants the funds:

- Debit – Expenditures – Public Safety
- Credit – Cash or Accounts Payable

FY 2026 Public Safety Revenue Sharing (PSRS) Frequently Asked Questions (FAQ)

4. How should a subgrantee record transactions related to Public Safety Revenue Sharing (PSRS) funding?

Subgrantees can record the receipt of PSRS funding as follows:

- Debit – Cash
- Credit – Contributions from Local Units – Public Safety Revenue Sharing (open revenue account number between 581 and 596)

Subgrantees can record the expense of PSRS funding as follows:

- Debit – Expenditures – Public Safety
- Credit – Cash or Accounts Payable

Timeline for Use of Funds

1. Does Public Safety Revenue Sharing (PSRS) funding have to be used by a specific date?

No.

2. Does Public Safety Revenue Sharing (PSRS) funding need to be used in the same fiscal year? If PSRS funds can be rolled to the next year, do the PSRS funds need to be restricted?

No, PSRS funding does not need to be used in the same fiscal year.

The PSRS funds are restricted when they are received. The PSRS funds need to be restricted until they are expended.

3. If the Public Safety Revenue Sharing (PSRS) funding is subgranted to another governmental entity, what is the timeline for transferring the PSRS funds?

There is no timeline for the transfer of PSRS funds.

Miscellaneous

1. [2025 Public Act 22, Section 959\(3\)\(c\)](#) states that “All local public safety initiative expenses must be related to public safety and designed to reduce identified risks to public safety and cannot include unproven intervention solutions to community violence.” Who will determine that an intervention is supported by evidence?

Treasury has no statutory role in this determination.

FY 2026 Public Safety Revenue Sharing (PSRS) Frequently Asked Questions (FAQ)

- 2. Who will help local units of government identify and connect with evidence-based interventions ([2025 Public Act 22, Section 959\(3\)\(c\)](#)) or providers?**

Treasury has no statutory role in identifying providers.

- 3. Is there an evaluation plan in place for Public Safety Revenue Sharing (PSRS) funding that could highlight outcomes and best practices as the program moves forward?**

Treasury has no statutory role in evaluating or reviewing spending.

- 4. Can local units of government (local units) use Public Safety Revenue Sharing (PSRS) funding regionally or collaboratively?**

PSRS funding must be used in compliance with [2025 Public Act 22, Section 959](#).

Eagle Township
Clinton County, Michigan
Ordinance No. 02-2026

**An Ordinance Amending the Eagle Township Code of Ordinances for Consumers Energy
Company Gas Franchise**

The Township of Eagle Ordains:

Section 1. Amendment to Section 19, Article II of the Eagle Township Code of Ordinances.

Section 19, Article II of the Eagle Township Code of Ordinances is amended in its entirety to read as follows:

Article II - Consumers Energy Company Gas Franchise Ordinance

Section 19.21: Consumers Energy Company Gas Franchise Ordinance Preamble

AN ORDINANCE, granting to CONSUMERS ENERGY COMPANY, its successors and assigns, the right and authority to lay, maintain and commercially operate gas lines and facilities including but not limited to mains, pipes, services and valves on, under, along, and across public places including but not limited to highways, streets, alleys, bridges, and waterways, and to conduct a local gas business in the TOWNSHIP OF EAGLE, CLINTON COUNTY, MICHIGAN, for a period of thirty years.

Section 19.22: Grant, Term

The TOWNSHIP OF EAGLE, CLINTON COUNTY, MICHIGAN, hereby grants to Consumers Energy Company, its successors and assigns, hereinafter called "Consumers" the right and authority to lay, maintain and commercially operate gas lines and facilities including but not limited to mains, pipes, services and valves on, under, along, and across public places including but not limited to highways, streets, alleys, bridges, and waterways, and to conduct a local gas business in the TOWNSHIP OF EAGLE, CLINTON COUNTY, MICHIGAN, for a period of thirty years.

Section 19.23: Conditions

No public place used by Consumers shall be obstructed longer than necessary during construction or repair, and shall be restored to the same order and condition as when work was commenced. All of Consumers' gas lines and related facilities shall be placed as not to unnecessarily interfere with the public's use of public places. Consumers shall have the right to trim or remove trees and vegetation if necessary in the conducting of such business.

Section 19.24: Hold Harmless

Consumers shall save the Township free and harmless from all loss, costs and expense to which it may be subject by reason of the negligent construction and maintenance of the lines and related facilities hereby authorized. In case any action is commenced against the Township on account of the permission herein given, Consumers shall, upon notice, defend the Township and its representatives and hold them harmless from all loss, costs and damage arising out of such negligent construction and maintenance.

Section 19.25: Extensions

Consumers shall construct and extend its gas distribution system within said Township, and shall furnish gas service to applicants residing therein in accordance with applicable laws, rules and regulations.

Section 19.26: Franchise Not Exclusive

The rights, power and authority herein granted, are not exclusive.

Section 19.27: Rates and Conditions

Consumers shall be entitled to provide gas service to the inhabitants of the Township at the rates and pursuant to the conditions as approved by the Michigan Public Service Commission. Such rates and conditions shall be subject to review and change upon petition to the Michigan Public Service Commission.

Section 19.28: Revocation

The franchise granted by this ordinance is subject to revocation upon sixty (60) days written notice by either party. Upon revocation this ordinance shall be considered repealed and of no effect past, present or future.

Section 19.29: Michigan Public Service Commission Jurisdiction

Consumers remains subject to the reasonable rules and regulations of the Michigan Public Service Commission applicable to gas service in the Township and those rules and regulations preempt any term of any ordinance of the Township to the contrary.

Section 19.30: Vacation or Relocation

The Township may require Consumers to vacate or relocate any portion of Consumers' facilities at Consumers' expense if such vacation or relocation is necessary to secure the public health and welfare or is otherwise required by the Township in the exercise of a governmental function.

Section 19.31: Compliance with Laws

Consumers shall comply with all laws, statutes, ordinances, rules and regulations regarding the installation, construction, ownership or use of its facilities, whether federal, state, or local.

Section 2. Repealer.

This Ordinance, when enacted, shall repeal and supersede the provisions of any previous Consumers' gas franchise ordinance adopted by the Township, including Ordinance No. 1-97, adopted February 3, 1997, including and any amendments thereto.

Section 3. Effective Date. This Ordinance shall take effect on September 20, 2026.

We certify that the foregoing Franchise Ordinance was duly enacted by the Township Board of the TOWNSHIP OF EAGLE, CLINTON COUNTY, MICHIGAN, on the 15th day of September, 2026.

Troy Stroud, Township Supervisor

Attest:

I, Laurie Briggs-Dudley, Clerk of the TOWNSHIP OF EAGLE, CLINTON COUNTY, MICHIGAN, DO HEREBY CERTIFY that the ordinance granting Consumers Energy Company, a gas franchise, was properly adopted by the Township Board of the TOWNSHIP OF EAGLE, CLINTON COUNTY, MICHIGAN, and that all proceedings were regular and in accordance with all legal requirements.

The Ordinance was offered by _____ and seconded by _____.

The vote was as follows:

YEAS: _____

NAYS: _____

ABSENT: _____

ABSTAIN: _____

Laurie Briggs-Dudley, Township Clerk

Dated: September 15, 2026

89351:00001:203021804-1

CERTIFICATE

I hereby certify that:

1. The above is a true copy of Ordinance No. 02-2026 adopted by the Eagle Township Board at a duly scheduled and noticed meeting of that Township Board held on September 15, 2026, pursuant to the required statutory procedures.
2. A summary of Ordinance No 02-2026 was duly published in the Lansing State Journal newspaper, a newspaper that circulates within Eagle Township, on September 20, 2026.
3. Within 1 week after such publication, I recorded Ordinance No 02-2026 in a book of ordinances kept by me for the purpose, including the date of passage of the ordinance, the name of the members of the township board voting, and how each member voted.
4. Within 14 days after adoption of Ordinance 02-2026, I filed an attested copy of said Ordinance with the Clinton County Planning Commission and Clinton County Clerk on September 21, 2026.

ATTESTED:

Laurie Briggs-Dudley, Eagle Township Clerk

Dated: September 21, 2026



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
REMEDIATION AND REDEVELOPMENT DIVISION



PHILLIP D. ROOS
DIRECTOR

July 1, 2026

VIA EMAIL

Demian Wincele, PFAS Project Manager
Army National Guard
111 South George Mason Drive
Arlington, Virginia 22204-1373

Dear Demian Wincele:

SUBJECT: Outstanding Comments for the Final Remedial Investigation Quality Assurance Project Plan at the Grand Ledge Army Aviation Support Facility, Grand Ledge, Ingham County, Michigan

Michigan Department of Environment, Great Lakes, and Energy (EGLE) staff has reviewed the final "*Remedial Investigation Report*" (Report) prepared for the Grand Ledge Army Aviation Support Facility (Site). This Report was initially received via email by EGLE on December 4, 2025. After providing initial comments on January 21, 2026, and receiving the Army National Guard's (ARNG) Response to Comments on March 10, 2026, EGLE completed a backcheck of the ARNG Response on Comments and submitted response on March 20, 2026.

Due to contract limitations, ARNG finalized the Report with outstanding comments from EGLE. EGLE was aware that this was a possibility ahead of the final Report being submitted. This letter documents EGLE's review of the Report, acknowledges the finalization of the Report without EGLE's full concurrence, and addresses EGLE's outstanding comments.

Included with this letter as an attachment is the Document Review Transmittal (DRT) containing the comments EGLE provided for this Report. Highlighted within the DRT are the comments that EGLE still considers outstanding and will continue to pursue every opportunity to address these comments in the future with ARNG.

The following outlines the topics that EGLE staff still consider outstanding.

Figures and Fate and Transport

EGLE questions the lack of inclusion of lithologic cross sections in the Report. Sole reliance on the environmental sequence stratigraphy cross sections over simplifies the local geology of the Site and potentially misrepresents the fate and transport of the contaminants related to the Site. It is an outstanding issue that lithologic cross sections were not included in the Report to better demonstrate the understanding of the Site geology. EGLE anticipates these being included in future work.

The statement of the fate of groundwater discharging in the Reed or Husted/Landenberg still appears to be postulated and should be recognized as so. EGLE anticipates additional future work to confirm the fate of groundwater moving beyond the installation boundary.

The characteristics of clay and sand water bearing zones do have the ability to communicate in a limited degree, however, presenting them as the same aquifer system significantly hinders the understanding of fate and transport of the contaminants on and off installation. In addition, superimposing the monitoring wells screened in clay and sand together may misrepresent the groundwater flow direction that is most applicable to the fate and transport of the Site contaminants. EGLE anticipates the preferential flow path for contaminants in groundwater will be better identified in future work.

Feasibility Study (FS) and Off-Site Impacts

EGLE understands ARNG's position that additional work will not take place until the FS. However, the FS currently is not funded and is not scheduled to be funded for at least one additional fiscal year from the time of this report. It is EGLE's position that prolonged delay in completing the FS and addressing contamination would result in further environmental impacts from installation sources and could impact off-installation drinking water wells as groundwater migrates. EGLE recommends that ARNG take as many proactive steps as possible to move this Site forward and to ensure long-term protectiveness for residents and the environment near the Site.

There are well documented impacts to the Reed Drain that can be traced back to ARNG activities on the installation. ARNG should consider Applicable or Relevant and Appropriate Requirements (ARARs) earlier in the process to streamline the phases of work, obtain as much critical data as possible, and avoid multiple follow-on investigations to address ARARs later in the process. Reed Drain has multiple surface water exceedances of the screening levels (SLs) that were selected for the project. Those SLs are a combination of the United States Environmental Protection Agency (USEPA) Regional Screening Levels, USEPA Maximum Contaminant Levels, and Department of Defense-adjusted SLs which are based on pooled method detection

limits and then have a 10x multiplier applied. The 10x multiplier is not a widely used practice and is not a promulgated value to use when performing risk evaluations. There are also exceedances of the Michigan Rule 57 of Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, Water Quality Values for per- and polyfluoroalkyl substances, which are detailed in the outstanding comments included with this letter. EGLE considers the environmental impacts on this drain to be a priority and should be addressed as soon as possible.

While there are currently no known impacts to residential drinking water wells based on previous ARNG sampling, continued monitoring at base boundaries has not been established to ensure that contaminated groundwater is not migrating towards those wells. Delayed start to the FS could result in impacted groundwater migrating further beyond the installation boundary resulting in a larger area to address during remedial efforts with additional challenges coming into play with private property access.

If you have any questions or concerns, please contact Amy Handley, Project Manager, Superfund Section, Remediation and Redevelopment Division (RRD), at Hanldeya@michigan.gov; 517-898-3356; or EGLE, RRD, P.O. Box 30473, Lansing, Michigan 78909-7973.

Sincerely,

A handwritten signature in black ink that reads "Amy Handley". The signature is written in a cursive, flowing style.

Amy Handley, Project Manager
Remediation and Redevelopment Division
Defense and State Memorandum of
Agreement Unit
517-898-3356

Enclosure

Cc: Walter Gee, ARNG
Beth Place, EGLE
Nate Zielinski, EGLE

MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, and ENERGY (EGLE)
DOCUMENT REVIEW TRANSMITTAL

Transmittal Date: 3/24/2026	SiteName: Grand Ledge Army Aviation Support Facility	IRP/Site: Multiple IRPs	Project Phase: RI	
Transmittal Tracking Number:	Final Transmittal Status:		Date of Document: Dec-25	
Document Name: DRAFT FINAL Remedial Investigation Report Grand Ledge Army Aviation Support Facility and Armory, Michigan			Date EGLE Received Doc.: 4-Dec-25	
Controlling Agency: Army National Guard		Point of Contact Demian Wincele, PG, PMP	E-mail: demian.e.wincele.ctr@army.mil	Telephone: 520-671-7821
AFCEC Consultant: AECOM		Consultant Point of Contact Savannah Wolfe	E-Mail savannah.wolfe@aecom.com	Telephone: 310-465-6190
EGLE Reviewers: Michigan Department of Environment, Great Lakes, and Energy (EGLE)		EGLE Point of Contact Amy Handley, Project Manager	E-mail HandleyA@michigan.gov	Point of Contact Telephone 517-898-3356
Instructions: The individual receiving these comments may use this form to transmit responses back to EGLE via e-mail. Please insert your response directly beneath the EGLE comment using blue font color and date each response. If necessary EGLE will "back-check" responses using green font color. EGLE will number each comment. If using separate pages, please refer to comment by its number. EGLE will maintain original copies of all transmittals in the file. *Unresolved comments will be addressed or documented through separate correspondence.				

#	Page	Worksheet/ Section	Additional Details	Lines	Agency	Comments
1					EGLE Comments	Please identify in the report the criteria used to determine whether a boring log from a permanent or temporary well was used in the cross sections (projected or not). EGLE requests that the lithology associated with each well used to create the cross-sections are identified in the section and consistent with the logs used. Please identify the justification for not including the lithology for certain boring logs in the cross sections.
					ARNG Response	Projected wells were removed from the Section 2 cross sections because they were not used in their interpretation. The project team held a detailed discussion on 26 February 2026, on the borehole logs and cross section interpretation process, as documented in the meeting slides and minutes included in Appendix J. Additional text was added to Section 2.2.1 that acknowledges the complexity of the subsurface, provides more clarity on the upper and lower channels, and incorporates specific borehole observations.
					EGLE Backcheck	Resolved.
2					EGLE Comments	The "Surface of Erosion" displayed on the cross sections is not noted or recorded in any of the boring logs reviewed. EGLE staff request that all data and/or justifications used to determine the presence and position of the displayed surface of erosion be identified in the report.
					ARNG Response	The erosional surfaces are evident in the cross section boring logs as distinct lithologic changes. Above these surfaces are packages of relatively coarser glacial sediment (e.g., channels), which are oriented roughly perpendicular to the section. This was added to paragraph three of the Environmental Sequence Stratigraphy Evaluation in Section 2.2.1.

		EGLE Backcheck	Unresolved. AOI01-02 (AOI01-2 in the report) is indicated as an example for the upper surface of erosion, however, it doesn't appear to be the best example when it is not included in the cross sections where the surface of erosion's presence is displayed. ARNG response is contradictory to say surface of erosions are "evident" while the cross sections present the shallow surface of erosion not to be associated with distinct lithologic changes. For example: AOI01-97 in Cross Section A-A' has the shallow surface of erosion displayed in the middle of a significant clay layer with no distinct change in lithology; AOI010-27 in Cross Section A-A' has the shallow surface of erosion displayed in the middle of a fat clay with no distinct change in lithology. In addition, the GSL displayed for AOI01-27 indicates a very coarse grain material where the boring logs recorded the geology to be a lean and fat clay with <5% gravel. The GSL does not appear to be in agreement with the boring log descriptions. AOI03-20 has no distinct lithologic change where the surface of erosion is displayed. It would appear the shallow surface of erosion displayed in the cross sections is more interpolation than a data supported interpretation. EGLE requests the upper "Surface of Erosion" feature in the cross section be given a definition to indicate interpolation and be presented as a dashed line.
		ARNG Response	ARNG respectfully disagrees that the mapped surface of erosion is unsupported or should be depicted as speculative. In glaciofluvial settings, erosional surfaces may not appear as consistent, discrete lithologic breaks in individual borings. Factors also considered in interpretations were; changes in depositional packages, stratigraphic position, and regional context across multiple data points. The ESS framework constrains that interpolation using depositional models and regional understanding, rather than relying solely on point lithologic observations. Variability at individual borings is expected and does not invalidate the interpretation. ARNG considers the depiction of the surface of erosion to be appropriate and supported by the available data. No changes are warranted.
3		EGLE Comments	EGLE staff recognize the development completed on the permanent monitoring wells to be inadequate. EGLE recommends a method of physical disruption be used (jetting, surging, airlifting) in order to flush and sort the filter pack installed around the well screens and remove fines. In addition, EGLE staff typically recommend two weeks separating initial development and the first sample collected at the well. The 24-hour time used in the permanent wells during the second mobilization could have negatively impacted the representativeness of the groundwater samples collected.
		ARNG Response	EGLE comments regarding the adequacy of well development and timing of initial sampling are acknowledged. The monitoring well development SOP was previously approved by EGLE through review and approval of the QAPP. While re-development and re-sampling of the permanent wells are not feasible, the permanent wells were re-sampled approximately six months following installation, during Mobilization 4. This later sampling event reflects fully equilibrated well conditions and is considered representative of ambient groundwater quality. Due to the timing of Mobilization 4, those results were not included in the writing of the report. A comparison of Mobilization 3 results to the Mobilization 4 results indicates minimal variable concentration changes, and no consistent directional trend. Review of the later dataset indicates that plume geometry, areas of exceedance, and overall nature and extent conclusions presented in the RI are not materially affected. No change was made.
		EGLE Backcheck	Resolved.

4		EGLE Comments	Geology Representation - The cross sections provide a speculative description of the geology by breaking up the lithologies into in four categories: Channel, Fill, Floodplain, and Consolidated Grand River/Saginaw Formation (Bedrock). This is described to be an “Environment Sequence Stratigraphy” evaluation (ESS). The ESS used appears to be potentially misrepresenting the subsurface conditions beneath the site. There is little consistency between what soil types are associated with what lithofacies. In many instances the presented “Channel” and “Floodplain” lithofacies both include the same clays described in the boring logs. Many of the boring logs do not match the with depth and/or thicknesses with the ESS lithofacies units. It is understood by EGLE staff that these cross sections are an attempt to model where the depositional environments reside and transition to assist in the understanding as to what pathway the contamination may be following. EGLE staff do not believe ESS is the appropriate evaluation to use to determine the pathway in which the contamination may or may not be leaving the site. Currently how ESS is used and presented, it detracts from the focus of where the high transmissive zones are located, which are assumed to be the governing subsurface material transporting contamination. As a result, the size of the “Channels” may be over inflated. It appears the “Channels” displayed, include sands, clays, and silts which do not lend a hand in understanding the exact orientation of the high transmissive zones. The juxtaposition of the lithofacies in the Cross Sections and figures in this report seem to have been created with potentially inappropriate assumptions. EGLE staff request an additional set of cross sections be created using industry standard lithostratigraphic methods including the identification of lithologies based on permeability and potential for transport.
		ARNG Response	The ESS interpretation is the best representation of conditions at the site and is a better illustration of the connectivity of permeable deposits. ESS is an EPA best-practice and incorporates regional/academic literature, known depositional environments, and the geometry, orientation, and extent of those deposits into the interpretation process. Critically, by incorporating these elements, this methodology creates a predictive 3-D model between and beyond existing site boreholes. At this site, the subsurface is comprised of a highly heterogeneous mixture of glacial till and meltwater channels that were deposited within tunnel valleys formed during glacial advance and subsequent retreat as described in Section 2.2.1. As stated in the response to comment #1, the project team held a detailed discussion on February 26, 2026, on the borehole observations and cross section interpretation process. The slides and meeting minutes are included as Appendix J. With respect to lithofacies determinations, the sediments within the tunnel valley are highly heterogeneous. However, the boring density for this site is inadequate to capture the intricate details of this deposit. Because of that, the stratigrapher simplified the color-scheme depicting these deposits. One color was used to represent a very complex, heterogeneous feature. This simplification makes the heterogeneous tunnel valley deposit appear homogenous, but the GSLs still speak to the true heterogeneity. Regional-scale cross sections also have this effect of simple visualization of very complicated deposits due to the lack of data resolution.
		EGLE Backcheck	Unresolved. EGLE staff believe the ESS utilized in this report does provide added value. However, EGLE staff do not agree that ESS is the best representation of conditions at the site. This is due to the significant amount of interpolation utilized, with less reliance on lithologic descriptions to define the bounds of the lithofacies projected with ESS. In addition, there are still observed inconsistencies of what lithology descriptions dictate which lithofacies they are a part of. It is recognized that there is a highly heterogeneous nature of the subsurface on this site and the appreciation of the very simple visual that ESS provides. However, as stated before, EGLE staff do not believe ESS is the appropriate evaluation to use to determine the pathway in which the contamination may or may not be leaving the site. EGLE staff request an additional set of cross sections be created using industry standard lithostratigraphic methods including the identification of lithologies based on permeability and potential for transport, along with the cross sections and figures developed with ESS.

			ARNG Response	ARNG respectfully disagrees that additional lithostratigraphic cross-sections are necessary. As discussed in the prior response and in the meeting on February 26, 2026, the subsurface at the site is a highly heterogeneous glacial system where lithology alone is insufficient to define hydraulic connectivity or predict the geometry of transmissive zones. The ESS approach integrates lithologic data with depositional context and regional understanding to develop a more realistic, 3-D model. Grouping sediments into depositional elements (e.g., channel and floodplain) reflects how they were formed as part of the same system and how they are hydraulically connected, which is critical for evaluating groundwater flow and contaminant migration. Variability in lithology and thickness between borings is expected in this setting and does not invalidate the interpretation. All subsurface interpretations require interpolation; ESS constrains that interpolation using established depositional models, improving consistency between data points. As noted previously, the interpretation appropriately identifies channel deposits as the primary transmissive features while accounting for the influence of finer-grained materials. ARNG considers the ESS-based cross-sections sufficient to support the conceptual site model and RI objectives. No additional cross-sections are warranted.
5			EGLE Comments	Due to the significant fluctuation of groundwater elevations between the Fall 2024 and June 2025 gauging data, EGLE staff request quarterly groundwater elevation gauging be conducted to better observe and understand the seasonal influences. The seasonal fluctuation could change the impact of Reed Drain on the site from season to season and how it might influence local groundwater flow.
			ARNG Response	The observed fluctuation in groundwater elevations between the Fall 2024 and June 2025 gauging events indicates that seasonal influences may affect groundwater conditions at the site. The potential value of quarterly gauging is acknowledged and will be considered during future phases of CERCLA process.
			EGLE Backcheck	Resolved.
6		671-673	EGLE Comments	EGLE requests the information supporting groundwater discharges to the Reed Drain further downstream from the site be identified in the report. The elevation of Reed Drain is lower than the site downstream as present on figures, however no data is identified in this report that may have recorded the groundwater elevation downstream from the site indicating potential discharge.
			ARNG Response	The information supporting discharge is the hydrogeologic principle that groundwater follows topography, which is sloping toward streams. As groundwater flows downgradient, the elevation will eventually meet the topographic/stream elevation. To further clarify, the report has been revised to state that water in the upper and lower channels discharge to Reed Drain downgradient of AOI03. The following text was updated: "• AOI03: Water in the upper and lower channels at AOI03 is confined , flows north/northeast through glacial fluvial channel sands, and discharges to Reed Drain further-downstream of AOI03the-site."
			EGLE Backcheck	Unresolved. Reed Drain is a man-made surface water feature whose relationship with groundwater may not be accurately defined as the trend of topography. All of the figures in the Report where groundwater elevations are presented are always lower than that of Reed Drain, indicating Reed Drain to be a "losing" water feature. There is no data presented in the Report to support that this relationship reverses further downgradient. The Looking Glass River to north, which is a natural waterway and sits at a much lower elevation, represents a water feature that groundwater would likely discharge to. The hydrogeologic principle in the ARNG Response in this case, cannot provide enough support to definitively state groundwater discharges to Reed Drain. EGLE requests the statement about groundwater discharging to Reed Drain be written as a potential temporary and not a definitive feature.
			ARNG Response	To further clarify, the statement regarding groundwater discharging to Reed Drain was revised to the following: "Water in the upper and lower channels at AOI03 is confined, flows north/northeast through glacial fluvial channel sands, and discharges downstream of AOI03 to Reed or Husted/Landenberg Drains, and as suggested by downstream wetlands, and where surface water elevations drop to near 820 ft amsl (See Figure 2-12)."
7			EGLE Comments	Figure 2-6, Top of Bedrock Elevation - In the boring logs: AOI03-43, AOI03-48, AOI03-20, AOI03-17, AOI03-10, AOI03-11, AOI3-14, AOI03-15 the top of bedrock was not definitively recorded and may not be appropriate for this figure. In some cases, "chunks" of bedrock are described. EGLE staff request it be indicated if the borings where "sand with sandstone chunks" are described and interpreted by the stratigrapher to be bedrock pulverized by the drilling process.

		ARNG Response	Sonic was the drilling method used and is known to pulverize weathered bedrock, resulting in the observed chunks. It is reasonable to assume that the chunks indicate bedrock. A clarifying note to this effect was added to Figure 2-6.
		EGLE Backcheck	Resolved.
8		EGLE Comments	Groundwater Elevation Contour Figures - Within this report (578-589) the Upper and Lower Channels are described to be fluvial channels. Glaciofluvial channels typically contain coarse soils with high permeability and transmissivity. EGLE staff do not consider it appropriate to include wells that are screened in a lithologic unit other than the one that is targeted (Upper/Lower Channel or Bedrock). The groundwater is going to move differently through the sand versus the clay. It does not lend support to understanding the fate and transport of the contamination related to the site when a non-fluvial lithology is mapped as a part of a fluvial channel system. EGLE staff believe the wells screened in clay are not representative of the targeted water bearing zones (Upper/Lower Channel and Bedrock) and request they be removed from all figures interpreted to represent the Upper Channel, Lower Channel, and Bedrock aquifers.
		ARNG Response	It is agreed that groundwater moves differently in clay than in sand. There is movement of groundwater in clay, but it would be slower. However, it is relevant to map these units together where the groundwater from one unit (clay) would be known to flow into another unit (the sand). Additionally, many of the wells are not entirely screened in clay. While a silt or clay layer may have been deposited in a different setting, they are now part of the aquifer system and will influence the distribution of contaminants dissolved in groundwater. While a monitoring well may intersect a clay layer, it is still providing data representative of the subsurface conditions. Upper and Lower Channel units include both the coarser grained channels and the finer grained floodplain deposits within the elevation intervals described in the third paragraph of the Environmental Sequence Stratigraphy Evaluation in Section 2.2.1.
		EGLE Backcheck	Unresolved. EGLE staff disagree in that it is not relevant to map two different aquifers together as one. The purpose of the RI is "define release areas, potential migration pathways, potential receptors, and associated exposure routes." Potential migration pathways, potential receptors, and associated exposure routes are largely assessed by defining the most likely path of transport the contamination will take, which is dictated by the highly transmissive zones in the subsurface. It is contradictory to the RI objectives to map multiple aquifer systems, with largely different hydrogeologic characteristics, together as one system. EGLE staff request additional groundwater elevation contour figures be incorporated into the report without any monitoring wells that are screened completely in clay. In addition, it should be noted that groundwater and consequently the contamination will migrate from finer grain soil to the coarser grain soils over time through back diffusion. In which back diffusion is most effectively monitored by wells screened in the coarser grained aquifer system.
		ARNG Response	ARNG acknowledges that groundwater flow differs between coarse- and fine-grained materials and that transmissive zones largely control advective transport. However, the identification of geologic materials as "Upper/Lower Channel" deposits should not be interpreted as constituting two aquifer systems. As discussed in Section 2.2.1, unconsolidated fluvial deposits resulting from melting of the glaciers, including well-sorted fluvial deposits as well as lacustrine-type clay deposits, are approximately 15 to 35 ft thick at the installation, and these unconsolidated materials overlie the bedrock. For there to be two aquifers present at the installation, a significant confining layer would need to be present at the site. The RI investigation identified no significant confirming layer above the bedrock and EGLE has not identified evidence of a confining layer, except to note that some monitoring wells contain a clay unit. In the absence of lateral continuity and sufficient thickness to inhibit vertical flow, these clay lenses cannot be considered confining layers as part of multi-aquifer system. Additional text was added to Section 2.2.1 to further clarify this. Monitoring wells that intersect finer-grained units are not necessarily screened exclusively in clay and provide relevant hydraulic head data reflective of site conditions. In addition, finer-grained materials are integral to understanding contaminant fate and transport, including storage and back diffusion processes that influence plume persistence and migration. In the absence of specific data indicating a multi-aquifer system is present within the first 35 feet of unconsolidated material, it would be inappropriate to present the results of the Remedial Investigation (e.g. groundwater elevation contour maps) as part of a multi-aquifer system. Accordingly, ARNG considers the groundwater elevation contour figures appropriate as presented. The dataset remains sufficient to meet RI objectives and support risk assessment and remedy selection. If future phases of the CERCLA process identify evidence of a multi-aquifer system present at the site, the approach to investigation and remediation of PFAS will be adjusted accordingly.

9		EGLE Comments	Figure 2-14 – There are a number of well screened in CLAY, please refer to the previous Comment 8. Please address accordingly.
		ARNG Response	See response to comment 8.
		EGLE Backcheck	See backcheck to comment 8 response.
		ARNG Response	See comment 8 response.
10		EGLE Comments	Figure 2-15 – AOI02-04, AOI03-44 and AOI-01-101, are screened in CLAY, please refer to the previous Comment 9 regarding wells screened in CLAY. Monitoring wells at the locations AOI01-11 and AOI01-12 are screened in the bedrock while Figure 2-15 is described to represent the “Lower Channel” groundwater elevations. EGLE staff request these wells be removed from this figure.
		ARNG Response	See response to comment 8. AOI01-11 and AOI01-12 are screened partially in lower channels and partially in the bedrock as shown on cross sections A-A' and C-C'. Only wells screened entirely in bedrock were included on the bedrock map. No change was made.
		EGLE Backcheck	See backcheck to comment 8 response.
		ARNG Response	See comment 8 response.
11		EGLE Comments	Figure 2-17 – A number of wells in this figure are screened in CLAY. Please see previous Comment 9 regarding wells screened in CLAY. Boring logs for AOI01-100, AOI01-103 and AOI-105 were not provided in this report. Groundwater Elevation Contours north of the site, projected over Reed Drain the groundwater contours look like a stacked horseshoe feature that is open to the east. EGLE staff request this feature be presented in dashed lines as it appears there is no data to support it. It is assumed the horseshoe feature is supposed to represent a potential interaction between Reed Drain and the groundwater, however there is no data presented to support this assumption. Please provide any applicable information/data in the report to support this feature.
		ARNG Response	See response to comment 8. The missing boring logs have been added to Appendix F. There are data to support this feature, including: - The groundwater level observed at AOI03-49, which results in the 827 contour wrapping to the east - Known principles of groundwater flow, that where shallow it follows topography and discharges to lower pressure areas (i.e. streams). --Non-detect contaminant data on the north side of Reed Drain, suggesting flow is not north, but east following topography as would be expected. Therefore no change was made to Figure 2-17.
		EGLE Backcheck	Unresolved. EGLE staff request in all groundwater elevation contour figures where interpolation is implied at distance from the nearest data point (i.e., indicating increased uncertainty), a dashed line is used to represent that portion of the groundwater elevation contour. In Figure 2-17 there is no data used to support the contour elevation lines 823, 824, 825 of AOI03 and need to be presented as a dashed line or not included. AOI03-49 is an isolated well screened in lean clay and has significant potential to be a part of a perched system. This could be indicated by the steep gradient between AOI03-49 and AOI03-47. A gradient that steep does not seem normal for the site and and currently on the figure appears to be treated as an outlier with no contours line between it and the 827-contour line. EGLE requests a justification for the inclusion of AOI003-49 be provided.
		ARNG Response	Figure 2-17 was revised to address EGLE's comment. Contour elevations of 823, 824, and 824 feet amsl in AOI03 were removed due to absence of monitoring well locations. AOI03-49 was also removed from the contouring analysis, and a note was added to the figure to document its exclusion.
12		EGLE Comments	Figure 2-18 – There are a number of well screened in CLAY, please refer to the previous Comment 8. Please address accordingly.
		ARNG Response	See response to comment 8.

					EGLE Backcheck	See backcheck to comment 8 response.
					ARNG Response	See response to comment 8.
13					EGLE Comments	Figure 2-19 –EGLE staff consider the bedrock elevations recorded in boring logs AOI01-10, AOI01-12 and AOI01-109 to potentially be a single connected channel carved into the bedrock oriented southwest to northeast (from AOI01-10 to AOI01-13). Currently it is presented as a two separate low areas with no data between them. Please clarify in the report.
					ARNG Response	Observation noted. There are physical constraints that limit where drilling can be conducted between AOI01-10 and AOI01-13, with the runway representing the primary constraint. If a pre-design investigation is required during later phases of CERCLA, future work at the site is expected to continue refining the CSM. Two north–south-oriented tunnel valleys are interpreted on the facies maps presented in the presentation slides included in the newly added Appendix J. These tunnel valleys are inferred to have incised the bedrock surface and generally correspond with the current bedrock surface. Separation of the two valleys is suggested by a bedrock high observed at AOI01-15, as shown on Figure 2-6. No change was made.
					EGLE Backcheck	Response recognized. EGLE staff continue to see the area between AOI01-10 and AOI01-12 as purely interpolation and AOI01-15 cannot provide sufficient insight to the area.
					ARNG Response	ARNG acknowledges EGLE's comment.
14		3.3	HHRA	726	EGLE Comments	It is stated that drinking water from the Annex Building's well was sampled in May 2017 and that PFAS were not detected. This is inconsistent with the statement (line 705-706) that references a US EPA guidance recommendation that recent data, generally from the most recent two years of data, be used in the HHRA. Groundwater exceedances are referenced to a May 2019 Site Inspection sampling event. Based on this timeline, EGLE requests it is determined if the 2017 drinking water sampling data accurately reflect the current knowledge of PFAS in the Annex Building's public supply well, and that the discussion of why data older than 2 years is used in the assessment is added to the report
					ARNG Response	Drinking water from the Annex Building public supply well was initially sampled in May 2017, at which time PFAS were not detected. Since that time, the Annex Building well has been sampled on an annual basis, and PFAS have not been detected in any subsequent sampling events. Ongoing sampling of the Annex Building's well is performed by MIARNG as part of their drinking water compliance program. The HHRA text was revised to reference the more recent drinking water sampling events. Use of the drinking water data is therefore considered representative of current conditions, and the assessment is consistent with US EPA guidance recommending the use of recent data. These data were not used quantitatively in the HHRA. The discussion of the 2019 SI data and the 2020 data was included to provide the history and context; those results were not quantitatively used in the HHRA.
					EGLE Backcheck	Resolved.
15		3-5	HHRA	807-809	EGLE Comments	It is stated that potable well samples were compared to USEPA's maximum contaminant levels (MCLs). Given the rapidly evolving state of national primary drinking water standards for PFAS, EGLE requests that the PFAS and their respective MCLs that were used for comparison at the time of these evaluations be identified in the HHRA.
					ARNG Response	The text in the Private Wells section of Section 3.1 of the HHRA was revised to list the MCLs used in the comparison.
					EGLE Backcheck	Resolved.
16		4-10	HHRA	1246-1247	EGLE Comments	It is stated that where fewer than 8 samples are available, the maximum detected concentration was used as the exposure point concentration (EPC). It should be clarified whether 8 samples or 8 samples having detections was used to satisfy this EPC decision logic. There are instances in the EPC summary tables (4-10 through 4-15) where a ProUCL-calculated 95%UCL was used in lieu of the maximum detected concentration where fewer than 8 samples had detections. In Table 4-10, for example, for AOI 3, the frequency of detection of PFDA in surface soil was 4 of 14 samples, and a 95% UCL was identified as the basis of the EPC. Therefore, it appears that total samples, regardless of number of samples with detections, may have been sufficient to use the 95% UCL as the EPC ifProUCL calculated a 95% UCL.

					ARNG Response	Any dataset having at least 8 total samples was processed using ProUCL. The ProUCL output was reviewed for each UCL, and if ProUCL included the following warning, the maximum detected concentration was used: "Warning: Data set has only x Detected Values. This is not enough to compute meaningful or reliable statistics and estimates." The ProUCL output for PFDA in AOI 3 surface soil, with a frequency of detection of 4: 14, does not include that warning, and therefore the ProUCL recommended UCL was used as the EPC. The text was clarified to include this information. The footnotes in Tables 4-10 to 4-15 were also clarified.
					EGLE Backcheck	Resolved.
17		ES-2		327-333	EGLE Comments	EGLE requests pursuing routine residential well sampling or routine monitoring well sampling along the base boundary at a minimum to verify and ensure PFAS is not reaching residential wells or moving further off-property until an action is taken to prevent offbase migration of PFAS. Based on the data and figures presented in this report, there is already some off-base migration both in ground water and surface water into Reed Drain. The DoD memorandum signed July 11, 2023 state that "the DoD Components are directed to evaluate the data gathered during Preliminary Assessments/Site Inspections and Remedial Investigations and assess where an interim action can be taken to mitigate further PFAS plume migration or ongoing impacts to groundwater, surface water, and/or sediment, from an on-base PFAS source area. The DoDComponents are further directed to prioritize implementation of interim actions as expeditiouslyas possible to address PFAS under CERCLA, such as removal of soil or sediment "hot spots" and installation of groundwater extraction systems, where supported by site-specific information." Based on the data the data collected thus far at GLAASF, EGLE supports and requests further actions and these should be expedited in every possible way.
					ARNG Response	At this time, there are no current plans for additional drinking water sampling unless new data supports the need for drinking water sampling. While not all residents granted right of entry for sampling, a high percentage of wells were sampled that resulted in either non-detected or very low detections for PFAS. Drinking water samples were collected during the SI, as this was the most expedient way to determine if drinking water wells in the area were impacted by PFAS releases at the AASF, prior to the installation of GW monitoring wells. Since PFAS was not detected above applicable screening levels (including current MCLs) no iterim action was necessary to address PFAS in private DW wells. During the course of the RI, groundwater monitoring wells were installed to characterize the PFAS plumes. Samples collected from the monitoring well network do not indicate that the groundwater plumes have migrated toward drinking water wells. The monitoring well network will be the primary means of evaluting groundwater conditions and potential risks to receptors. ARNG can only initiate a removal action, such as providing an alterante source of drinking water, where the ARNG installation is the source of the contamination. Therefore, unless groundwater monitoring well results indictate that PFAS plumes originating from the AASF have implacted private drinking water wells, sampling of private drinking water wells is not recommended. Even if drinking water sampling was performed and elevated concentrations of PFAS were identified, ARNG would not be able to initiate a removal action unless there was evidence to suggest the PFAS originated from the installation. Currently the sampling results from the monitoring well network indicate that any PFAS present in private wells did not originate from the AASF.
					EGLE Backcheck	Unresolved. EGLE understands the triggers that ARNG have been following to initiate actions for drinking water, however there are impacts to groundwater and surface water as a results of activities that have taken place at GLAASF. Reed Drain is contaminated with PFAS that exceeds Michigan's WQVs and the established SLs for this investigation. This groundwater contamination vents into the drain and does trace back to activities at AOI03 and AOI01 and should be addressed by ARNG. There are also groundwater impacts at AOI01 that are extending off the base boundary and those results also exceed Michigan criteria. EGLE requests that ARNG take a proactive approach for addressing these groundwater and surface water impacts that have been identified through their investigation.

					ARNG Response	ARNG acknowledges EGLE's comment. Based on the results of the HHRA and ERA, there were unacceptable risks identified at Reed Drain and in groundwater. Therefore, the next step in the CERCLA process is the FS where ARNG will evaluate remedial alternatives for the areas posing risk. Where it is determined that a prompt response is required to address an imminent and substantial threat to human health or the environment, a removal action will be initiated. In accordance with DoD policy (memorandum signed September 3, 2024), removal actions are currently being prioritized to address private drinking water wells impacted by PFAS from DoD activities where concentrations are known to be at or above three times the MCL values. As indicated in the prior response, this trigger for action does not currently apply to GLAASF; therefore, a removal action is not currently prioritized.
18		Table 5-1	HHRA		EGLE Comments	EGLE requests the table header is revised to the current installation, since it is misidentified as Grayling Army Air Field.
					ARNG Response	The table header was revised to Grand Ledge Army Aviation Support Facility and Armory.
					EGLE Backcheck	Resolved.
19		Appendix B4			EGLE Comments	EGLE requests the tables are revised since it is misidentified as Grayling Army Air Field.
					ARNG Response	Agreed. The Tables in Appendix B4 have been revised.
					EGLE Backcheck	Resolved.
20		9.4			EGLE Comments	Data gaps were identified following the completion of RI field activities. As discussed in the TPP3 meeting on January 9, there is currently no funding or plan to conduct the FS or other actions at GLAASF. EGLE requests that ARNG pursue funding as soon as possible to address these data gaps, develop and initiate the FS, and pursue any necessary interim actions to mitigate the transport of PFAS off property in groundwater and surface water to Reed Drain. As part of the efforts to address these gaps and actions, EGLE requests to be involved in the review and selection process for actions being taken at the site by having routine meetings to discuss next steps and plan project scopes.
					ARNG Response	ARNG acknowledges EGLE's comments. At this time, there are no current funding requests for additional investigation; no specific near-term actions planned; and the schedule for the FS has not yet been determined. It is not uncommon for data gaps to be addressed during the FS; therefore, the need for any additional investigation will be evaluated as part of interim actions or the FS phase of the CERCLA process.
					EGLE Backcheck	Unresolved. EGLE agrees that data gaps can be addressed as part of future activities, including the FS. However, with no plans for an FS at this time and no further actions being taken, EGLE does not agree with the approach ARNG is taking for this site to address impacts that were identified. EGLE requests that greater effort be made to address the groundwater and surface water impacts that were identified in these investigations that are exceeding Michigan criteria and/or the project SLs for groundwater and surface water either through an FS or interim actions. The unmonitored and untreated groundwater will continue to impact the surface water in the area of this site and groundwater plumes will continue to advance further off site to impact non-ARNG properties. □
					ARNG Response	This comment is acknowledged. Please see backcheck response to comment #17.
21		Table 4-1	Screening Levels		EGLE Comments	EGLE notes that some of the screening values used for the RI are multiplied by 10 to account for the non-residential scenario. What is the basis for this multiplier? Please provide further clarification on the selection of a 10x multiplier for these values or provide the reference that describes the validity of applying a multiplier for this reason. EGLE requests that for the RI and all future work for this site that the most stringent criteria be used for the screening values, including the State of Michigan's criteria which are lower for some of the compounds. Rule 57 Water Quality Values for PFOS (12ppt) and PFNA (30ppt) and lower than the values used during the RI for surface water. The State drinking water MCL for PFBS (420ppt) is also less than the screening level used for tap water during the RI.
					ARNG Response	The use of the 10x multiplier of the tap water RSLs for surface water screening and 10x multiplier of the residential soil RSLs for sediment screening was a programmatic decision made by the ARNG to estimate changes in exposure when assuming a non-residential scenario compared to a residential scenario. If the surface water is an expression of groundwater, a focused point of groundwater recharge, and is used as a source of drinking water or directly discharges into a water body used for drinking water purposes, the factor of 10 is not added to the tap water RSL. As Reed Drain, the stormwater detection basin, and the stormwater swale are not directly used for drinking water purposes, the factor of 10 was applied.

					EGLE Backcheck	Unresolved. EGLE appreciates the further explanation of the 10x multiplier, thank you. However, EGLE does not agree to its use during the RI. Based on the information presented in this RI report, there are exceedances at or above this 10x multiplier across this site for groundwater. Further action should be taken at this site to address those exceedances. Michigan's cleanup criteria will come into play as ARARs for this site and it would be beneficial for ARNG to consider the most stringent criteria early in the process. Additionally, although this has been discussed as a programmatic decision, EGLE does not agree with the use of a multiplier on OSD RSLs. EGLE is not aware of any guidance or policy from OSD regarding the use of a multiplier on any PFAS screening value. Further, in consultation with EPA Region 5 and EPA Region 3, screening level approaches are region specific, and EPA Region 5 does not utilize the 10x multiplier.
					ARNG Response	ARNG acknowledges EGLE's comments. Please see backcheck response to comment #17 regarding future actions. Fully promulgated State requirements that qualify as ARARs will be evaluated during ARARs development in the FS and considered as part of potential future interim actions. The 10x multiplier applied to tap water RSLs for non-residential surface water scenarios reflects a risk-based approach to account for reduced exposure relative to residential scenarios. This approach originated from a EPA Region 3 comment on the US Army Environmental Command (USAEC) PFAS RI Programmatic Quality Assurance Project Plan and was subsequently adopted across the Army (USAEC and ARNG) PFAS RI programs. While EPA Region 5 does not routinely apply this multiplier, the approach has been applied consistently across Army PFAS RI programs at installations nationwide and is protective for RI purposes. To maintain consistency with this program, no change is recommended.
22		Global	ARARs		EGLE Comments	EGLE requests that state ARARs are considered to identify additional data gaps that may exist, if this has not already been completed. State of Michigan criteria that would be considered ARARs could change the level of effort for actions taken at the site for surface water and groundwater. For example, delineation would not be complete.
					ARNG Response	ARNG acknowledges EGLE's comments. Fully promulgated State requirements that qualify as ARARs will be evaluated during ARARs development in the FS and considered during future interim actions. ARNG will incorporate any applicable promulgated requirements once ARARs are formally identified. It should be noted that ARARs are action-specific and therefore the appropriate timing for evaluation is when specific actions are discussed.
					EGLE Backcheck	Unresolved. Based on the EPA best practices for identifying and determining state ARARs, OLEM Directive 9200.2-187, potential ARARs should begin to be discussed during the scoping phase and continue through the remedial investigation and beyond. Additionally, as a state partner under DSMOA, EGLE is identifying potential future ARARs as early as we can to expedite environmental response. Please see EGLE backcheck comments #20 and #21.
					ARNG Response	ARNG acknowledges EGLE's interest in early consideration of State ARARs. Fully promulgated State and Federal ARARs will be evaluated and incorporated during the FS and any interim actions, as appropriate. At the RI stage, selected risk-based screening levels were sufficient to characterize nature and extent and support the HHRA. The RI conclusions remain valid, and the screening levels are protective and sufficient for identifying areas posing unacceptable risk.
24					EGLE Comments	Contaminant Plume Maps – In Figures 6-22 through 6-27, it is noted, a number of groundwater samples that were collected from both permanent and temporary monitoring well screens were installed in clay and some of the highest contaminant concentrations are found in these wells. It forces the question of, what does this data mean for the conceptual site model (CSM)? One of the potential pathways of exposure to the contamination in the groundwater is the path of drinking water via a drinking water well. Typically, any drinking water well, private or municipal, is not going to be installed in clay, therefore it is difficult to gauge the fate of the contamination when it is being monitored in a saturated tight clay lithology. If some of the significant concentrations found in the wells screened in clay were actually found in a monitoring wells screened in sand, it would have a very different implication for the CSM. In most cases these types of contaminant investigations do not focus on the contamination in the clay as they do not represent contamination in a lithology characteristic of a viable drinking water aquifer. In general, the significant clay units encountered on this site do not represent the characteristics of a viable drinking water aquifer. EGLE staff request that it be indicated on figures and in the narrative which groundwater samples collected were from saturated clay units. Concentrations in clay often translate to lower concentrations in higher transmissive zones over time through back diffusion. Therefore, the concentrations in clay do not carry the same risk as those found in high transmissive zones, such as the channel sands described to be encountered at this site.

		ARNG Response	Agreed, significant clay units encountered at this site do not represent the characteristics of a viable drinking water aquifer. However, the data for PFAS in groundwater of clay-bearing units are still pertinent to the CSM and the mapping of overall plumes found at the site. Although it is agreed that groundwater moves differently in clay than in sand, all data points are important and relevant to understanding migration at the site, including areas that may be sourcing back diffusion. It is important to note that all drinking water samples in the surrounding areas were either non-detect or below USEPA MCLs. The following text was added to the end of the first paragraph in the Section 6.3 narrative to indicate that the clay units encountered do not represent characteristics of a viable drinking water aquifer: "As exhibited on the cross sections and figures, several monitoring wells are screened within saturated clay units, which are not considered representative of a viable drinking water aquifer."
		EGLE Backcheck	Resolved.
25		EGLE Comments	Boring Logs and/or well constructions logs for monitoring wells GL-MW-01-100-30, GL-MW-01-100-45, GL-MW01-103-45, GL-MW-01-105-15, GL-MW-01-105-30, GL-MW-01-106, GL-MW-01-109, GL-MW-03-50, AOI03-40, AOI03-37, AOI03-39, and AOI03-42 are not provided in the report. EGLE staff request they be provided and included in the report
		ARNG Response	Agree. The missing boring/construction logs have been added to Appendix F.
		EGLE Backcheck	Resolved.
25		EGLE Comments	EGLE recommends considering the Argonne ecological screening levels (Eco SSLs) during the data gap investigation to further evaluate the risk to the environment. These values are commonly used in the CERCLA process and may alter the determinations made for environmental impacts and risk. If these values were considered during the RI, please specify in this report if and when those values have been considered.
		ARNG Response	Ecological screening values for soil and surface water from Argonne National Laboratory were used in the Ecological Risk Assessment provided in Appendix I. The Argonne National Laboratory is cited in the report as "Grippio et al. 2024." No change is recommended.
		EGLE Backcheck	Resolved.
26		EGLE Comments	EGLE requests that the State threatened and endangered species be reviewed and evaluated through MNFI as part of the data gap. It appears that State T&E were not considered during the RI and subsequently not included in the report with the Federal species evaluation. Therefore, EGLE considers this action for T&E considerations incomplete.
		ARNG Response	ARNG acknowledges EGLE's comment. The RI workplans did not include an evaluation of rare species through the Michigan Natural Features Inventory. A review of the state threatened and endangered species can be evaluated in future phases of CERCLA. No change is recommended.
		EGLE Backcheck	Acknowledged, EGLE will be expecting this review to take place at the earliest possible opportunity by ARNG and ARNG should prioritize addressing the data gaps and additional actions needed at this tsite. A final risk assessment will not be considered complete from EGLE's perspective until this assessment has been done.
		ARNG Response	The RI included a review of federally listed species through USFWS IPaC, consistent with CERCLA and NCP guidance. While CERCLA and the NCP do not require review of state-listed species, ARNG recognizes EGLE's interest in these resources, and consideration of state T&E species can be potentially addressed in subsequent CERCLA phases where ecological receptors could influence remedial alternative development.
27		EGLE Comments	EGLE recommends applying the same soil screening levels across all depth intervals in the RI and should consider using the residential criteria consistently for that effort. It should be noted that utilizing different screening values at different depths is not how soil exposures are interpreted for Michigan criteria and therefore may be considered incomplete.
		ARNG Response	While the RI used industrial RSLs to discuss nature and extent for subsurface soil in the RI, the HHRA used the residential RSLs for COPC selection for both surface and subsurface soil. Further, the HHRA included a quantitative residential scenario in which EPCs were calculated for surface and subsurface soil combined, to serve as a UU/UE scenario. In reviewing the document in response to this comment, it was discovered that PFOS in AOI 3 combined soil should have been identified as a preliminary COC. Therefore, the HHRA was revised to include PFOS in AOI 3 as a preliminary COC.

	EGLE Backcheck	Unresolved. Industrial RSLs are inappropriate to determine nature and extent during the RI; therefore, delineation is incomplete. Without the use of residential RSLs for delineation it is possible that the highest risk concentrations have not been sampled yet. Residential RSLs are the appropriate screening level to determine nature and extent unless there is an existing land use control that was completely implemented and restricts the property. EGLE requests the copies of the land use controls and deed restrictions. Otherwise, an UU/UE scenario cannot be achieved without this delineation, because the potential exposure areas have not been fully identified.
	ARNG Response	To clarify, the differences in soil SLs reflect their distinct purposes in the RI versus the HHRA and do not conflict. The RI's nature and extent evaluation uses industrial SLs for subsurface soils to represent more realistic exposure scenarios based on current land use and anticipated receptors. The HHRA applies residential SLs for both surface and subsurface soils to evaluate a conservative UU/UE scenario. Soil samples for nature and extent characterization were collected using a grid-based approach focused on areas with the highest detected PFAS concentrations from the SI soil results, corresponding to identified PFAS release areas. This ensures that sampling targeted the locations most likely to represent the highest risk concentrations. Regarding land use controls and deed restrictions, these are typically developed and finalized during later CERCLA phases, and assumptions about existing land use were appropriately incorporated into the RI and HHRA. No changes to the report are recommended.

Minutes (DRAFT)
Eagle Township Board Meeting
Tuesday, August 18, 2026
Eagle Twp. Hall - 14318 Michigan Street, Eagle, MI 48822

1. **Call to Order:** Meeting was called to order by Supervisor Stroud at 6:00 pm. Pledge of Allegiance.
2. **Present:** Clerk Laurie Briggs-Dudley, Treasurer Chelsea Hoppes, Trustee Rob Currie, Trustee Michelle Hoppes, Supervisor Troy Stroud.
3. **Others Present:** Bill Morgan, Morgan & Associates
4. **Citizens Present:** Rob Gross, Cori and Dan Feldpausch, Janine Dyer, Dennis Strahle, Casey Godlewski
5. **Auditor Bill Morgan:** The auditor gave an overview of the Eagle Township annual audit for the period ending March 31, 2026. No issues were found with Eagle Township financials and internal controls. The auditor gave an Unmodified Opinion which is the best rating possible.
6. **Citizens Comments:** Cori Feldpausch met with a Grand Valley film student regarding Eagle Township for a documentary. A resident thanked the Board for paving Little Lake Drive.
7. **Consent Agenda:** Motion by Treasurer C. Hoppes supported by Supervisor Stroud to accept the consent agenda as presented. Motion carried.
8. **Agenda Approval:** Motion by Treasurer C. Hoppes supported by Trustee Currie to approve the agenda as presented. Motion carried.
9. **County Commissioner Report:** Not present
10. **Looking Glass Regional Fire Authority (LGRFA) Report:** Supervisor Stroud reported that the LGRFA Board has requested more details on runs from the Delta Fire Department. The LGRFA Board requested Eagle Township and Watertown Township approve a new treasurer position on the board. The Eagle Township Board has requested the Delta Fire Chief attend the September Township meeting.
11. **Eagle Township Planning Commission Report:** Trustee Currie reported that the Planning Commission is continuing to review the Interim Zoning Ordinance (IZO). The Planning Commission will hold a special meeting on September 1 to continue reviewing the IZO. Chairperson Rich will present a timeline for the permanent zoning ordinance at the August meeting.
12. **Code Enforcement Report:** Reviewed the report of open enforcements.
13. **Board Members reports:** Clerk Briggs-Dudley reported that the August election went well. The State will reimburse 80% of early election wages. A limb fell at Niles Cemetery and the Clerk and Treasurer agreed to have Jake Schafer clean up the limb for additional cost. Pat O'Neill and Dennis Strahle will dig where the septic tank cover is this week to prepare for pumping.

14. **Accounts Payable:** Motion by Clerk Briggs-Dudley supported by Supervisor Stroud to approve the bill payment list as presented with a hold on the Clinton County Road Commission (CCRC) Brush Spraying payment waiting for Supervisor Stroud's approval after he contacts the CCRC and all other regular monthly bills. Motion carried.
15. **LEAP Grant for Hall Updates:** No action.
16. **Public Safety Revenue Sharing:** No action. Waiting for further guidance from the State of Michigan.
17. **Site Plan PUD, etc:** No action.
18. **Survey of Michigan Street property:** Motion by Supervisor Stroud supported by Treasurer C. Hoppes to engage Keba Surveying to survey the Eagle Township property including staking for \$900. Motion carried.
19. **Eagle Ridge Road:** No action.
20. **Board of Review Resignation/Appointment:** Motion by Clerk Briggs-Dudley supported by Treasurer C. Hoppes to appoint Janine Dyer to the Eagle Township Board of Review as a regular member through December 31, 2026, to complete Don Volk's term. Motion carried.
21. **LGRFA Treasurer Position:** Motion by Supervisor Stroud supported by Treasurer C. Hoppes to approve the creation of a Looking Glass Regional Fire Authority Treasurer board position and authorize any necessary amendments to the Authority's governing documents to implement this change. Motion carried.
22. **L4029 2026:** Motion to authorize the adoption of the 2026 L-4029 Tax Rate Request as presented and authorize the Supervisor and Clerk to sign and file it with Clinton County. Motion carried.
23. **Consumers Energy Gas Franchise Ordinance:** Motion by Clerk Briggs-Dudley supported by Treasurer C. Hoppes to refer the Consumers Energy Gas Franchise Ordinance to Foster Swift for review. Motion carried.
24. **Auditor Representation Letter:** Motion by Clerk Briggs-Dudley supported by Trustee M. Hoppes to approve the draft audit report for FY 25-26 and to approve the Supervisor and Clerk sign the Audit Representation Letter to Morgan and Associates, CPA & Advisors, PC. Motion carried.
25. **Insurance Renewal:** Motion by Clerk Briggs-Dudley supported by Supervisor Stroud to approve the Clerk e-sign the Michigan Municipal Risk Management Authority (MMRMA) Property & Liability Insurance E-Proposal for coverage from October 1, 2026, to October 1, 2027, at a cost of \$7,405. Motion carried.
26. **Citizen Comments:** None
27. **Adjournment:** Motion by Trustee Currie supported By Supervisor Stroud to adjourn the meeting at 8:35 pm. Motion carried.

Laurie Briggs-Dudley, Clerk

AGREEMENT FOR RECREATION SERVICES

This Agreement is effective as of the 1st day of July 2026, by the City of Portland (City), whose address is 259 Kent Street, Portland, Michigan, 48875, and Eagle Township (Township) whose address is 14318 Michigan St., Eagle, MI 48822 (collectively, the “parties” and individually, a “party”).

WHEREAS, the Township is authorized to provide recreation services to its residents; and

WHEREAS, the City of Portland operates a Recreation Department used by residents of Eagle Township to supplement the Township’s Recreation program; and

WHEREAS, the Township desires to enter into an agreement with the City of Portland to allow Township residents to use the Recreation Programs.

THEREFORE, the parties agree as follows:

1. Purpose. The purpose of this Recreation Service Agreement is to secure the provision of additional Recreation service options from the City of Portland for the residents of Eagle Township.

2. Provision of Recreation Department. During the term of this Agreement, the City of Portland agrees to allow all Eagle Township residents to use the Recreation Services, offered by the City of Portland to City residents and at the same rate charged to City residents. City Recreation Services may include but are not limited to City personnel and officials, use of City equipment, and utilization of City property.

3. Hold Harmless. To the extent permitted by law, and except for the negligence or willful misconduct of City, its employees, and/or agents, the Township agrees to defend, indemnify, and hold City harmless from any and all liability arising out of or in any way related to the Township’s use and receipt of Recreation Services provided by City employees’ and agents’ in the performance of Recreation Services during the term of the Agreement, including any liability resulting from intentional or reckless acts

4. Term; Termination. The term of this Agreement shall be one year, beginning July 1, 2026, and ending on June 30, 2027. The Agreement may be terminated upon 30 days’ written notice by either party.

5. Consideration. As consideration, the Township agrees to pay the City of Portland \$2,000. The Township shall pay the City of Portland within 60 days of the Effective Date.

6. Amendment. This Agreement may be amended only by execution of a written amendment signed by duly authorized representatives of the parties.

7. Severability. If any part of this Agreement is held to be invalid or unenforceable under the laws of any jurisdiction where this Agreement is to be performed or sought to be enforced, the remaining provisions shall be enforceable to the maximum extent permitted by law; provided, however, that such remaining provisions effectuate fully the intent of the parties as manifested herein.

8. Governmental Immunity. By signing this Agreement, neither the City nor the Township waives its governmental immunity nor any defenses available to it or its elected or appointed officers, employees, agents, or volunteers under Michigan law.

9. Prohibition against Discrimination. The parties agree that in carrying out the terms of this Agreement that they shall not deny any person the equal protection of the laws; nor shall the parties deny any person the enjoyment of his or her civil rights or discriminate against any person because of his or her actual or perceived race, color, religion, national origin, sex, age, height, weight, marital status, physical or mental disability, family status, sexual orientation, or gender. The parties further acknowledge and agree that its breach of this paragraph shall be a material breach of this Agreement.

10. Applicable Law and Venue. The parties shall comply with all applicable laws in performing services under this Agreement. This Agreement shall be construed in accordance with the laws of the State of Michigan, in the Courts of Ionia County.

11. Entire Agreement. This Agreement contains the entire understanding between the parties hereto with respect to the services contemplated herein and supersedes all prior and contemporaneous agreements and understandings, oral or written, with regards to such services.

12. Counterparts. This Agreement may be executed in counterparts, each of which shall be deemed an original, but all of which shall constitute one and the same instrument.

WHEREFORE, the parties having read and understood the foregoing provisions of this Agreement acknowledge their intent to be bound by the terms as evidenced by the signatures of their respective representatives below.

EAGLE TOWNSHIP

CITY OF PORTLAND

Troy Stroud, Supervisor

James Barnes, Mayor

Date: _____

Date: _____

Monique Miller, Clerk

Date: _____

8.0 MEDIA

8.a. Process for Media Contact and Response

All requests for Board member interviews, comments or other feedback will be placed on the agenda at the next regular meeting. If the request is urgent and has the potential to negatively affect the township or is controversial, a special meeting may be called. The Township encourages all media inquiries regarding Township operations, policies, or official Board actions to be directed to the Township Board. When a media inquiry concerns matters that may significantly affect the Township, such as issues that are urgent, the Board may choose to address the inquiry at its next regular meeting or, if necessary, call a special meeting to develop an official Township response.

This process is intended to promote accuracy and consistency in communications on behalf of the Township. It is not intended to, and does not, restrict the ability of any elected Board member to speak in their personal capacity under the First Amendment.

8.b. Opinion

It is noted that all Board members have the right to speak their opinions as individuals but not on behalf of the Board or township. It must be made clear when providing any media comment when such is an opinion, specifically telling the media contact not to include Eagle Township or their governmental role when speaking as a private citizen. Board members retain the right to express their personal views as private individuals. However, when doing so, Board members must clearly state that they are speaking solely in their personal capacity and not on behalf of the Board or Township.