



R05-26-A-031

## APPLICATION INFORMATION SHEET

- (1) **Applicant Identification** City of Benton Harbor, Michigan  
200 E. Wall Street  
Benton Harbor, MI 49022-4430
- (2) **Website URL** <https://www.bhcity.us/>
- (3) **Funding Requested**  
a. Assessment Grant Type: Community-wide  
b. Federal Funds Requested: \$500,000
- (4) **Location** Benton Harbor, Berrien County, Michigan
- (5) **Target Area and Priority Site Information**  
**Target Area:** Riverfront
- Priority Site 1: Travel Inn Motel, 655 and 699 Riverview Drive, Benton Harbor, MI
  - Priority Site 2: 400 Riverview Drive, Benton Harbor, MI
- Target Area:** Core Business District
- Priority Site 3: Water and Park Street Redevelopment, 253 Park Street; 225 Fifth Street; and 214, 218, 230, and 259 Water Street, Benton Harbor, MI
- Target Area:** Ox Creek Corridor
- Priority Site 4: Michigan Gas Utilities, 352 Highland Avenue, E. Main Street (11-54-0018-0032-02-1), Third Street (11-54-0018-0032-03-9), and 350 E. Main Street, Benton Harbor, MI
- Refer to the attached map, which illustrates the identified target areas and priority sites.
- (6) **Contacts**
- a. Project Director: Alex Little, City Manager, Director of Community and Economic Development  
269.204.2776  
alittle@bhcity.us  
200 E. Wall Street  
Benton Harbor, MI 49022
- b. Chief Executive/Highest-Ranking Elected Official: Mayor Marcus Muhammad  
269.338.5798  
mmuhammad@bhcity.us  
200 E. Wall Street  
Benton Harbor, MI 49022
- (7) **Population** City of Benton Harbor (population 9,103)



**(8) Other Factors**

Other Factors	Page Nos.
Community population is 15,000 or less.	1, 5
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	N/A
The priority site(s) is impacted by mine-scarred land.	N/A
The priority site(s) is adjacent to a body of water.	2, 3
The priority site(s) is in a federally designated flood plain.	4
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	4
The reuse of the priority site(s) will incorporate energy efficiency measures.	4
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	2, 4
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities for priority site(s) within the target area(s).	N/A
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	N/A


**(9) Letter from the State or Tribal Environmental Authority**

Attached.

**(10) Releasing Copies of Applications**

N/A.

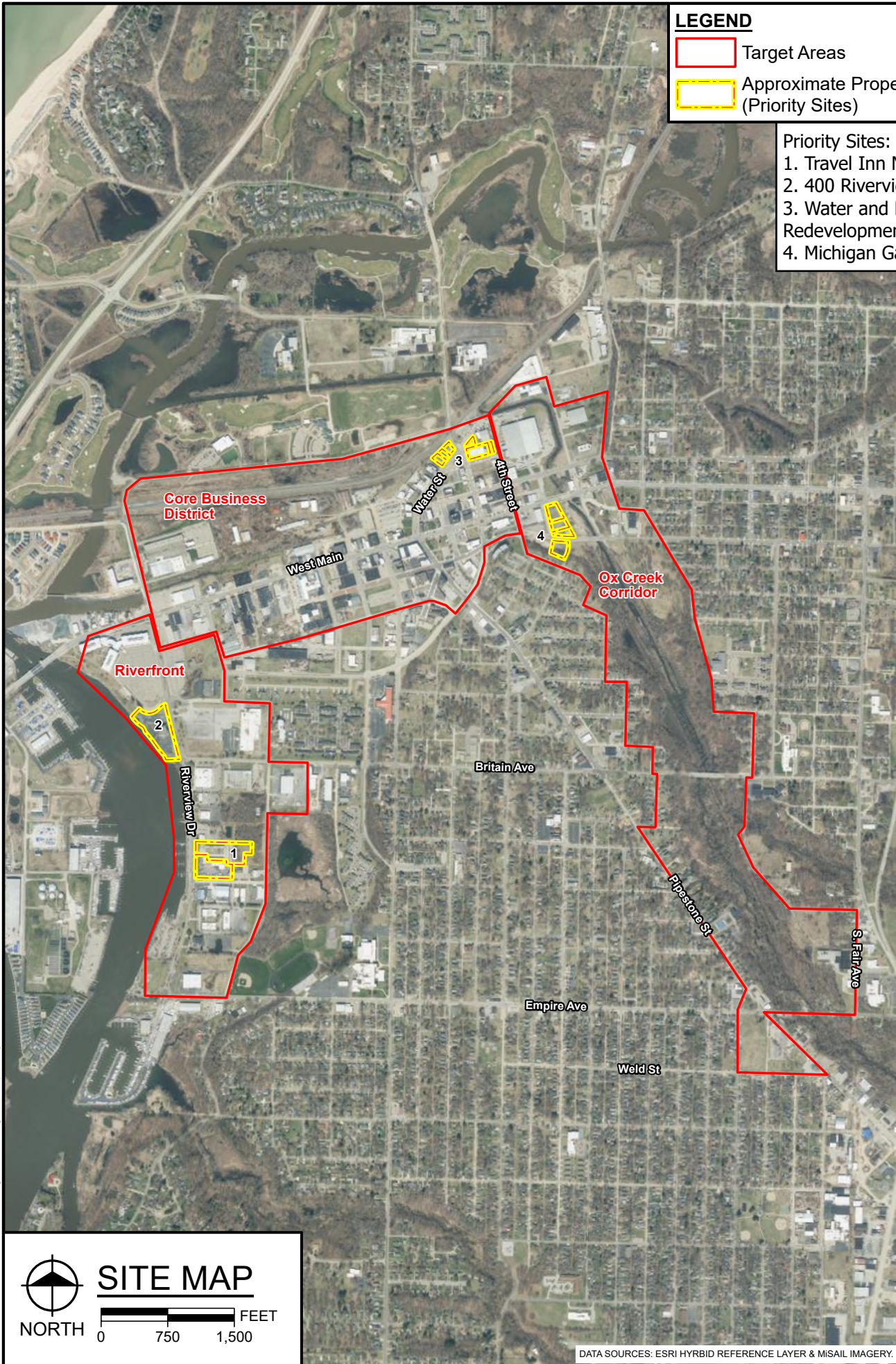
**LEGEND**

-  Target Areas
-  Approximate Property Boundary (Priority Sites)

**Priority Sites:**

1. Travel Inn Motel
2. 400 Riverview Drive
3. Water and Park Street Redevelopment
4. Michigan Gas Utilities

Hard copy is intended to be 8.5"x11" when plotted. Scale(s) indicated and graphic quality may not be accurate for any other size.



**Benton Harbor**  
 Benton Harbor, Michigan  
**FY26 EPA BROWNFIELD COMMUNITY-WIDE ASSESSMENT GRANT**

PROJECT NO.  
2600085

FIGURE NO.

**1**



**SITE MAP**

0 750 1,500 FEET

DATA SOURCES: ESRI HYBRID REFERENCE LAYER & MISAIL IMAGERY.



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

January 15, 2026

VIA EMAIL

Mayor Marcus Muhammad  
Alex Little, City Manager  
City of Benton Harbor  
200 East Wall Street  
Benton Harbor, Michigan 49022

Dear Mayor Muhammad and Alex Little:

SUBJECT: Michigan Department of Environment, Great Lakes, and Energy (EGLE)  
Acknowledgment of a United States Environmental Protection Agency  
(U.S. EPA) Brownfield Grant Proposal for 2026

Thank you for your notice and request for a letter of acknowledgment for the city of Benton Harbor's proposal for a U.S. EPA Brownfield Grant. EGLE's Remediation and Redevelopment Division encourages and supports community-led environmental assessment and redevelopment efforts and recognizes the city's need for funding.

The city of Benton Harbor is applying for a \$500,000 Community-wide Brownfield Assessment Grant. As a general-purpose unit of local government, the city of Benton Harbor is an eligible grant applicant.

Should the U.S. EPA award a brownfield grant to the city of Benton Harbor, it would allow the city to conduct environmental investigations and promote economic development at brownfield sites. If you need further information about potential eligible sites in the city of Benton Harbor or assistance regarding EGLE's brownfield programs, please feel free to contact me at the number below or by email at [SmedleyR@Michigan.gov](mailto:SmedleyR@Michigan.gov).

Sincerely,

Ronald L. Smedley  
Federal Brownfield Coordinator  
Brownfield Assessment and Redevelopment  
Section  
517-242-9048

# 1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

## 1.a. Overview of Brownfield Challenges and Description of Target Area

The City of Benton Harbor (**geographic area**) is located in Berrien County in southwest Michigan on the shores of Lake Michigan, approximately 105 miles from Chicago and 199 miles from Detroit. Benton Harbor was once a thriving community, home to manufacturing plants for Whirlpool, Superior Steel Castings Company, and Auto Specialties Manufacturing Company. However, in the 1950s and '60s, various manufacturing plants closed, relocating to other states and even other countries. As job opportunities left the area, many residents followed suit—seeking places with better jobs and resources. Today, Benton Harbor has a population of just 9,103 and is one of Michigan's poorest communities with a poverty rate of 41.9%, 29% higher than the overall county (12.9%) and state (13.4%) (U.S. Census 2023 ACS 5-year estimates). Historically, white-collar jobs, companies, and the region's hospital have been located in the neighboring City of St. Joseph, giving that community additional resources for its larger tax base that contribute to its local economy and schools, in stark contrast to Benton Harbor, where in 2019 the sole public high school nearly closed due to budget deficits (PBS News).

Although this EPA grant will be utilized throughout the city and its proposed outcomes will benefit the entire community, the **primary target areas** will be three reuse priority city corridors: the Riverfront, Core Business District, and Ox Creek Corridor. These target areas are located in the federally established census tracts 3 (CT3) and 4 (CT4) and, according to the MiEJScreen screening tool, are characterized by high unemployment (97th and 84th percentiles, respectively), low-income populations (88th and 99th percentiles), high pollution burden (96th and 99th percentiles), and high housing burden (91st and 95th percentiles), which all negatively impact the local economy. The **Riverfront** extends along the St. Joseph River and Riverview Drive, bordered to the south by W. Empire Avenue and to the north by Main Street, and is located in the disinvested CT4. For the past decade, it has been a priority of the city to create a public use amenity in this target area that increases walkability and boosts economic development. Cited as a division line between Benton Harbor and St. Joseph, the Riverfront consists of blighted, boarded up, and vacant commercial buildings; underutilized properties; and forgotten parking lots along 0.82 miles of riverfront. The 2023 Best Benton Harbor Community Plan envisioned this area as being redeveloped with 116 new homes to create connectivity between the city's neighborhoods, St. Joseph River, and downtown Benton Harbor; however, there are at least 14 sites of known environmental contamination within the corridor that hinder redevelopment.

Northeast of the Riverfront is the **Core Business District**, stretching about twenty blocks from Riverview Drive to Fourth Street, within CT4. The Core Business District is focused along the main thoroughfare, Main Street. In 1965, the Core Business District was home to 151 businesses, including grocers, gasoline stations, department stores, and pharmacies. By 1975, over 68 businesses reportedly left and were listed in the directory as "vacant" or had been demolished altogether. The disinvestment in the local economy has left the once-busy thoroughfare in a state of blight. The Core Business District contains over 27% (41 sites) of the city's known sites of contamination in just 0.25 square miles.

Southeast of Main Street and the Core Business District, bordered to the south by Weld Street and to the north by Water Street, and located along a former railroad track once used to reach a manufacturing area is the 1-mile-long **Ox Creek Corridor** target area. Straddled between the under-resourced and disinvested CT3 and CT4, Ox Creek is one of the most urbanized portions of the St. Joseph River Watershed, which drains 15 Michigan and Indiana counties. Suffering from excessive amounts of waste, CT3 and CT4 within the area rank in the 96th and 99th percentiles, respectively, for environmental conditions and effects including proximity to cleanup sites (96th and 100th), proximity to hazardous waste facilities (95th and 94th), impaired water bodies (61st and 100th), proximity to solid waste sites and facilities (86th and 72nd), proximity to Risk Management Program sites (83rd and 94th), and wastewater discharge indicator (46th and 79th) (MiEJScreen). Redevelopment goals for this corridor involve restoration efforts of the creek, creation of urban walking trails to increase public access for recreation, and redevelopment of the Bobo Brazil Community Center, a temporary resiliency center in

times of power outage to increase resilience to the impacts of extreme weather events and natural disasters. While the city has been successful in cross-agency partnership efforts leveraging more than \$7.2M in state and federal funding to advance the city's vision for a vibrant, healthy Ox Creek Corridor with biking/walking trails and bridges, commercial development, and housing opportunities, cleanup planning and due care evaluations are still needed to fully utilize this space as a public amenity.

This EPA grant would act as a catalyst for the redevelopment of our target areas by providing funds for environmental assessments, hazardous material/asbestos/lead building surveys, due care plans, and cleanup planning, including planning for resilience to extreme weather events. Without upfront funding to determine the potential environmental risks associated with these sites, they will remain stalled in a legacy of uncertainty. Knowledge is key to turning this legacy around and helping revitalize the local economy—encouraging emerging entrepreneurs to reinvest in their communities and breaking the cycle of neglect, blight, and unaddressed contamination.

#### 1.b. Description of the Priority Brownfield Site(s)

Within the city, there are 219 known sites of contamination, representing 35% of the known contaminated brownfield sites throughout Berrien County ([Michigan.gov/EGLE](http://Michigan.gov/EGLE)). The city has identified the following priority sites, which demonstrate large environmental challenges and are prime locations for redevelopment that would bring the most benefit to our target area communities.

1. **Travel Inn Motel:** Within the **Riverfront** target area, this nearly 2.5-acre property consists of three former Travelodge structures that once operated over 60 units. The structures are in a severe state of disrepair with nearly every window and doorway boarded up. The property has known environmental contamination based on the presence of volatile and semi-volatile organic compounds (VOC/SVOCs) due to the release of 6,000 gallons of fuel oil in 1984. Cleanup activities, including removal of the fuel tank and soil removal, were completed in the early 2000s; however, further assessment is warranted to determine current site conditions and implications for redevelopment.
2. **400 Riverview Drive:** Developed in the 1970s with an 8,200-square-foot (sq. ft.), four-story office/bank building, 400 Riverview Drive has been vacant for years, save for occasional short-term renters. The property is a known site of contamination based on the presence of chlorinated VOCs and metals in the soil. With 700 ft of river frontage, this site is a prime location within the **Riverfront** target area for residential housing, but known contamination has caused redevelopment challenges.
3. **Water and Park Street Redevelopment:** Located in the **Core Business District** in an area where historical industrial operations took place, a developer has approached the city to redevelop more than six properties (over 1.6 acres of commercial, warehouse, and manufacturing buildings) into a mixed-use project. 253 Park Street contains a 6,250 sq. ft. former metal stamping and an alloy castings foundry and is a known contamination site with select metals, polynuclear aromatic hydrocarbons, and VOCs in soil. These conditions may require engineering controls and barriers, posing challenges for potential residential housing. 230 Water Street is the only vacant parcel and is a Part 213 Open Leaking Underground Storage Tank (LUST) site. Because several other contaminated sites are in close proximity, it is anticipated that further assessment and cleanup planning is needed for all the involved properties.
4. **Michigan Gas Utilities:** Within the **Ox Creek Corridor** target area, along the eastern side of Third Street, are four parcels of property addressed as 352 Highland Avenue and totaling approximately 2.0 acres of mostly vacant land. Developed in the 1970s with two small utility sheds totaling 400 sq. ft., the property is a Part 213 Open LUST site. Additional site investigation is anticipated on this property and its neighboring parcels to support redevelopment as an expansion of Hall Park.

#### 1.c. Identifying Additional Sites

The City of Benton Harbor Brownfield Redevelopment Authority (BHBRA) will work collaboratively with its community partners, local economic development agencies, and the development community to find opportunities where the Assessment Grant can be incorporated. The BHBRA manages project applications and funding evaluation criteria. These evaluation criteria include consistency with local

redevelopment priorities, reuse plans, and zoning; an evaluation of how brownfield conditions will be alleviated; whether the project will be a catalyst to development in the area; economic benefits and job creation; and the degree to which overall project success appears achievable.

#### 1.d. Reuse Strategy and Alignment with Revitalization Plans

The 2023 Best Benton Harbor Community Plan (“Community Plan”) outlines seven primary strategic goals including creating the (1) Best Life: enhance public amenities, improve environmental, health, and wellness conditions, and increase new housing; (2) Best Work: develop employment training and encourage job growth and expertise; (3) Best Parks, Play, and Recreation: revitalize Ox Creek for recreational and natural amenities and improve existing parks by ensuring they are safe community spaces; (4) Best Mobility: improve existing transportation modes and prioritize vulnerable users; (5) Best Waterways: prioritize environmental protection of waterways and create a strong public waterfront, harbor area, and downtown commercial area; (6) Best Design: enhance neighborhood design and service provisions, ensure new construction is complementary to existing resources, update the zoning ordinance to support redevelopment, and develop missing middle housing; and (7) Best Art: increase public art, performance, entertainment, museums, and cultural resources.

The Community Plan involved 57 planning and outreach sessions and outlines the **Riverfront** as one of seven focus areas for new, missing-middle housing. Major elements of the plan along Riverview Drive include three- to four-story mixed-use buildings in close proximity to the Whirlpool Campus, with upper-story residential and first-floor commercial spaces accommodating up to 1,503 residents. The reuse would result in \$344,716 of new taxable value, seven public-use buildings, five renovated structures, and an expanded riverfront park and river trail system. Community vision planning envisioned the **Travel Inn Motel** priority site, which is located across from the existing marina, to be redeveloped as public greenspace. The former motel property is currently under partial site ownership by the City of Benton Harbor, and the city is working to gain control of the remaining portion in order to assess site conditions for future use as a public park/greenspace, aligning with the Community Plan’s third strategic goal of creating a safe, public park. The Community Plan also outlined an expansion of the current building at **400 Riverview Drive**, which a developer intends to fulfil by renovating the current structure into a mix of uses, including one to two commercial units on the first floor, prioritizing locally owned restaurants and businesses; up to 15 condominium units above; the construction of additional condominium structures; and connectivity to the public boat launch just 0.5 miles down the road, increasing walkability with a public space and river boardwalk. The proposed project achieves multiple city strategic goals, including 1. Best Life, 5. Best Waterways, and 6. Best Design.

The Community Plan also involved a market analysis of Benton Harbor’s downtown, within the **Core Business District**, which determined that the city could support up to 27,000 sq. ft. of new retail space (15 to 21 new stores) and 15,000 sq. ft. of new or expanded restaurant space (6 to 9 restaurants), representing the potential to generate up to \$16M in new annual sales if located in a walkable mixed-use downtown. The **Water and Park Street Redevelopment** aligns with these goals by renovating an existing 4,825 sq. ft. former manufacturing/warehouse building into a commercial first floor with apartment above; a 6,250 sq. ft. warehousing building into a wedding venue, activating the back alleyway with lighting and outdoor seating; and an existing 26,000 sq. ft. manufacturing building into a micro retail market with upper-level residential units.

The city recently secured a \$1M Spark Grant from the State of Michigan to redevelop and install new amenities at Hall Park, which is eastern adjacent to the central portion of the **Ox Creek Corridor**. In tandem with this project, the city plans to acquire the **Michigan Gas Utilities** properties and neighboring parcels to expand Hall Park by adding additional parking and recreational amenities for public use, achieving the third goal of the Community Plan (Best Parks). Overall, the work envisioned with this grant is aligned and supports the community’s plans, initiatives, and priorities for redevelopment and reuse within our three target areas.

#### 1.e. Outcomes and Benefits of Reuse Strategy

The Community Plan/Master Plan includes a comprehensive set of goals to become a more sustainable city. The **Riverfront** and **Ox Creek Corridor** target areas are located in the identified resiliency opportunity area, designated as containing environmentally sensitive areas that should incorporate local resilience to impacts of extreme weather events and natural disasters, including prohibiting development of residential developments in the 100- and 500-year floodplains, prohibiting destruction of wetlands, discouraging industrial development in resiliency areas, creating local and/or lower cost energy sources, ensuring developments incorporate best practices for water retention/run-off control such as green infrastructure, and creating more opportunities for public enjoyment of waterways. These factors are incorporated into the vision plan for the **Travel Inn Motel** by creating a new public greenspace across from the existing marina, allowing for future public interaction with the St. Joseph River, and the **400 Riverview Drive** redevelopment based on the planned connectivity to the public boat launch just 0.5 miles down the road with a public space and river boardwalk. The 400 Riverview Drive redevelopment is also anticipated to conservatively generate over \$120,000 in annual taxes and up to 50 new jobs. The proposed redevelopment of the **Michigan Gas Utilities** site will create a 2-acre urban nature walking area addition to the adjacent Hall Park. As the only priority site situated fully in a floodplain, it will intentionally not result in construction of a structure. The **Water and Park Street Redevelopment** will reuse and revitalize a total of over 37,000 sq. ft. of warehousing and manufacturing operations in the **Core Business District** into mixed use (commercial and residential), 88% of the market analysis need as stated above, representing \$14M of the \$16M forecasted annual sales.

The Community Plan outlines higher consideration for city support of housing developments, and planned unit developments will be given to projects that are all-electric, use energy-efficient electric systems, utilize renewable energy, or otherwise integrate environmentally friendly construction and design. While it is unknown if any of the priority site redevelopments will incorporate renewable energy or energy-efficient systems, CT3 and CT4 are in the 93rd and 95th percentiles, respectively, for high energy costs. Therefore, renewable energy and/or energy-efficient systems should be incorporated when feasible for missing middle housing and to keep business operation expenses down.

#### 1.f. Resources Needed for Site Reuse

Receiving assessment grant funds would be instrumental to encouraging the reuse of sites, as understanding the environmental site conditions is the first step to spur redevelopment, generating detailed plans and costs that other funding sources require. While unknown environmental site conditions has traditionally been a barrier to redevelopment, Benton Harbor is experienced in cross-agency partnerships and can receive federal and state funds, as well as enact local tax incentives that help private developers fund assessment, cleanup, and redevelopment. Michigan's Brownfield Laws allow the city to capture future tax increment from new investment on the property to pay for environmental assessment, cleanup and demolitions, infrastructure, site preparation, and housing development costs. The city can also capture tax increment for a Local Brownfield Revolving Fund, which is locally controlled and can be used for activities on other brownfield sites. Thus, the grant monies would truly act as seed money to leverage future brownfield redevelopment activities. The city has adopted and successfully implemented Brownfield Plans, which have captured tax increment to reimburse developers for cleanup, demolition, and due care activities. The EPA grant creates a unique opportunity to not only assess sites, but also to leverage other funding to clean up sites, dramatically changing the target areas.

The State of Michigan maintains a Brownfield Redevelopment Grant and Loan program, which can also be accessed, providing up to \$2 million for a single site to pay for environmental cleanup, asbestos removals, and demolition activities. The State of Michigan's Community Revitalization Program is another available resource for qualifying projects (i.e., near downtown, mixed-use development). This program can provide up to 25% of the project cost as a cash benefit to the developer upon successful completion of the project. Depending on the location and scale of a redevelopment project, other funds will be used to leverage the grant monies; potential public sources include tax abatements, Neighborhood

Enterprise Zone tax incentives, Community Development Block Grants (CDBG), and banks or developers that have an interest in improving the target community.

#### 1.g. Use of Existing Infrastructure

A strength of the city is that the target areas and the priority sites are served by existing municipal utilities, and existing streets, curbs, gutters, and sidewalks are available for reuse. When possible, priority site projects will utilize existing infrastructure. Sidewalks are present at all priority sites, with the exception of the **Michigan Gas Utilities** property, which has deteriorated sidewalks present halfway on the west side of the property along 3rd Street and no sidewalks along the south side of the property along Highland Avenue and Jefferson Street. The city recently expended a total of \$258,345 CDBG funds, as identified in the 2021–2025 Consolidated Plan, for improvements to infrastructure such as streets, sidewalks, ADA improvements, and stormwater retention. Additional grant funding will be pursued and leveraged to support infrastructure needs. As other redevelopments occur, improvements to infrastructure that is needed and will complement the new investment will be a required criterion when reviewing project applications.

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

### 2.a. The Community's Need for Funding

The City of Benton Harbor is seeking an Assessment Grant due to its limited financial capacity to address these legacy sites without assessment support. Benton Harbor was once an affluent city with 19,136 residents (1960 U.S. Census data); however, today Benton Harbor has a population of just 9,103, with our target area census tracts (CT3 and CT4) representing just 2,041 and 2,515 residents, respectively. Despite the city representing less than 5.9% of Berrien County's total population, it is disproportionately affected by environmental issues, hosting 35% (219 sites) of the county's known contaminated sites (Michigan.gov/EGLE). This environmental burden is compounded by high poverty rates (41.9% in CT3 and 52% in CT4) compared to 12.9% in Berrien County and 13.4% statewide. The median household income in Benton Harbor is starkly lower at \$29,652 compared to \$68,984 in the county and \$72,389 in the state. The population downfall, coupled with being one of Michigan's poorest communities, has dwindled the city's tax base. Without investment, the city has fallen into blight and disrepair. These disparities highlight the urgent need for funding to support environmental assessments in our community, which lacks the financial capacity to address these legacy sites independently.

### 2.b. Health or Welfare of Sensitive Populations

Sensitive populations in our target areas—primarily housing-burdened residents, residents of developmental ages, and low-income residents—face compounded health risks due to socioeconomic factors. CT3 and CT4 rank in the 81st and 98th percentiles, respectively, for socioeconomic factors, including low-income populations (88th and 99th), educational attainment (89th and 97th), population under age 5 (46th and 97th), unemployment (97th and 84th), and housing burden (91st and 95th), among other factors (MiEJScreen). The institutional and social inequities that contribute to poverty in these communities lead to significantly worse health outcomes compared to wealthier communities that have not faced decades of disinvestment. Environmental contamination exacerbates health disparities, contributing to conditions such as asthma, cancer, cardiovascular disease, and other serious illnesses. CT3 and CT4 fall into the 96th and 99th percentiles for environmental effects, indicating high exposure to contaminated sites (96th and 100th), hazardous waste facilities (95th and 94th), impaired water bodies (61st and 100th), solid waste sites and facilities (86th and 72nd), and Risk Management Program sites (83rd and 94th), along with elevated lead paint (67th and 50th) and wastewater discharge indicators (46th and 79th) (MiEJScreen). Through this EPA Grant, the target areas have a crucial opportunity to assess, understand, and manage the environmental risks present in their communities; this data is also necessary to leverage additional funding to address and clean up these risks.

### 2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions

Exposure to environmental contaminants significantly heightens health risks in our target areas. Using comparison to state and national averages as a baseline, Berrien County and specifically the City of

Benton Harbor have a greater than normal incidence of disease and adverse health conditions. Berrien County exhibits a higher cancer mortality rate (162.0 per 100,000) than both the state (158.3) and the nation (146.0) (CDC State Cancer Profiles, 2018–2022). Poor water and air quality are linked to cancer, a relationship reflected in Benton Harbor.

In CT3 and CT4 16% and 16.5%, respectively, of adult residents currently have asthma (CDC PLACES: Local Data for Better Health, 2023), which is well known to be directly related to high ozone impact (CT3 and CT4 are in the 99th percentile for ozone according to MiEJScreen). Additionally, these census tracts are in the highest quartile (top 25%) for diabetes prevalence in Michigan with a prevalence rate of 27.7% and 23.8%, also exceeding the national average of 13.6% (CDC PLACES, 2023). Further, these census tracts rank in the 84th and 79th percentiles for heart disease, as well as the 96th and 93rd percentiles for low life expectancy, indicating higher incidence of disease based on nearly every health factor assessed (MiEJScreen). The revitalization of the **Ox Creek Corridor** and **Riverfront** target areas as public amenities and greenspace will encourage city residents to increase movement, aiming to reduce the rate of these negative health conditions in CT3 and CT4.

According to the 2019 USDA Food Access Research Atlas, 21.9% of residents in CT3 and 43.8% in CT4 are without vehicles and more than 0.5 miles from a supermarket, indicating a majority of Benton Harbor is a food desert. People with limited access to supermarkets may depend on convenience stores and fast-food outlets for their meals, which may not contain the same nutrients that fresh food does, further affecting immune system diseases like asthma. Food insecurity has also been linked to increased risk of birth defects. Berrien County birth defects have been trending upwards, with an average growth rate of 9.05% (2003–2019), higher than Michigan (2.6%) (Michigan Birth Defects Registry). The EPA grant will allow us to identify, assess, and manage risks on priority sites, ultimately facilitating the development of cleanup plans that promote equitable and healthier living conditions for local residents.

#### 2.d. Economically Impoverished/Disproportionately Impacted Populations

All six census tracts covering the City of Benton Harbor are economically impoverished and disproportionately share the negative consequences of environmental impact compared to the county and state of Michigan based on factors such as higher health indices; lack of safe, affordable housing; a legacy of pollution; persistent poverty; high unemployment; distressed neighborhoods; and the operations and policies that led to these factors.

Since the withdrawal of manufacturing companies in the 1950s and 1960s, the target areas have suffered from a loss of industrial jobs, disinvestment, and property abandonment. This is evident in the city's Urban Renewal Plan, which called for demolition of 281 buildings and clearing of 121 acres, many of which are still vacant. Additionally, CT3 and CT4 are ranked as some of the highest areas of vulnerability (98.76% and 90.44%, respectively; CDC/ATSDR Social Vulnerability Index) due to factors like socioeconomic status, household characteristics, housing type, and transportation. From 2010 to 2014, the city was under emergency financial management by the state; in order to get out of debt, decisions were made to break 30-year water contracts, sell off assets, cut services, and eliminate city jobs, including the entire parks department. The withdrawal of commercial operations and policy decisions demonstrate decades of social and institutional disinvestment within walking distance of the gleaming, affluent City of St. Joseph, which in comparison has seen socioeconomic growth.

Using grant funds for smaller projects or mixed-use project sites provides an opportunity for federal funds to positively impact small, local businesses and entrepreneurs. Our focus on CT3 and CT4 will serve the diverse, underserved communities that have been overlooked. By identifying risks and facilitating cleanup planning efforts, we aim to stimulate development with strong reuse strategies that create new job opportunities, thereby supporting the community in building generational wealth. Two of our priority sites, **400 Riverview Drive** and the **Water and Park Street Redevelopment**, will create new housing units and commercial/retail spaces, generating additional tax revenues, jobs, and housing units to benefit two of our target areas. Our other two priority sites, **Travel Inn Motel** and **Michigan Gas Utilities**, will create up to 4.5 acres of safe greenspace, encouraging city residents to increase

movement and aiming to reduce the rate of negative health conditions in CT3 and CT4. Current city initiatives are focused on advancing resilience, strengthening community-based organizations, and seeking community engagement between local residents, community leaders, nonprofits, and regional agencies. We will actively involve community members in the decision-making process, thereby fostering ownership and alignment with local needs.

2.e.–2.f. Project Involvement and Project Roles

Organization & Point of Contact	Mission	Specific Project Involvement
<b>Benton Harbor Downtown Development Authority (DDA)</b> Richard Hensel bentonharbordda@gmail.com	Catalyze investment and connect resources to foster a consistent quality of life within the downtown area.	Marketing of grant funds to business opportunities. DDA priorities in alignment with city goals will be used for decision-making. The grantee will communicate with the DDA monthly to generate project leads, especially in the Core Business District.
<b>Cornerstone Alliance</b> Andrew Haan Ahaan@cstonealliance.org	Support businesses and entrepreneurs of all types to improve economic opportunities for everyone in Southwest Michigan.	Broaden reach of marketing, education, and outreach throughout the grant period by leveraging relationships with experienced developers and proposed projects in all three target areas. This partnership will specifically assist in decision-making by evaluating where assessment is most likely to support proposed redevelopment and reuse.
<b>Project Need Foundation</b> Mary-Alice Adams projectneed.bentonharbor@gmail.com	Building sustainable and equitable systems to bring about needed changes to safeguard the welfare of Benton Harbor families.	Community engagement—the city will leverage this partnership to secure input from sensitive populations in the target areas on their priorities, which will be used to identify project sites that address community needs.
<b>Total Wellness by Choice</b> Deidre Fields, twbychoice@gmail.com	Benefit the community of Benton Harbor socioeconomically.	Education and outreach support—this partner will be involved in the planning of education and outreach events to engage the community in grant outreach and raise citizens’ health and environmental awareness.

2.g. Incorporating Community Input

As priority site projects proceed, it is the city’s intention to engage the community and solicit input through partner connections, monthly Benton Harbor Brownfield Redevelopment Authority (BHBRA) meetings (which are held in person and also streamed online with the ability to submit public comment through the city clerk in advance), DDA meetings, Developer Days coordinated with Cornerstone Alliance, and community outreach events. The BHBRA will establish three in-person educational outreach events at a public, easily accessible location that will inform citizens on the type of assessments that can be conducted with the EPA Assessment Grant funds and solicit feedback on any new sites and desired outcomes. One of these educational events will be specifically in partnership with Total Wellness by Choice to promote environmental awareness, supported with assessment data, and promote positive health outcomes accomplished through the grant. The BHBRA will partner with Cornerstone Alliance to establish a minimum of two Developer Days over the grant period to connect with experienced developers, providing education and assessment resources to bring projects to fruition and align

assessment activities on sites with proposed redevelopment and reuse. Advertisements will be placed in existing retail establishments, convenience stores, and restaurants in the Core Business District. One to two planning meetings with the Project Need Foundation will be held upon implementation of the grant to determine the best means of disseminating information (e.g., location, time, format) that will be received by sensitive populations in our target areas in order to build connections and solicit meaningful input. All community input will be responded to through each community partner and will be used in assessment decision-making. The city website and social media platforms including LinkedIn will be utilized to advertise EPA grant-funded success stories. The city and BHBRA will also produce and distribute brochures, grant fact sheets, and performance dashboards.

### **3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

<b>Task 1: Phase I Environmental Site Assessments (ESAs)</b>
a. Project Implementation: 15 Phase I ESAs on priority sites in target communities. 13 Phase I ESAs on non-priority sites chosen by the city and BHBRA, with community input.
b. Anticipated Schedule: By 4th qtr. FY27, complete 6 Phase I ESAs on priority sites and 4 on non-priority sites; by 4th qtr. FY28, complete 5 Phase I ESAs on priority sites and 4 on non-priority sites; by 4th qtr. FY29, complete 4 Phase I ESAs on priority sites and 5 on non-priority sites.
c. Task Lead: Qualified Environmental Professional (QEP) for Phase I ESAs, applicant oversight.
d. Outputs: 28 Phase I ESAs, 28 All Appropriate Inquiry (AAI) checklists, 28 eligibility demonstrations, site access agreements, and ACRES updates.
<b>Task 2: Phase II ESAs, Baseline Environmental Assessments (BEAs), Due Care Plans</b>
a. Project Implementation: Completion of Quality Assurance Project Plan (QAPP), completion of Sampling and Analysis Plans (SAPs) and Health and Safety Plans (HASPs) for each Phase II ESA. 6 Phase II ESAs on priority sites. 6 Phase II ESAs on non-priority sites as determined by the city and the BHBRA, with community input. For contaminated sites (estimated 7), completion of BEAs for liability protection and Due Care Plans to address “continuing obligations.”
b. Anticipated Schedule: By 2nd qtr. FY27, complete QAPP; by 4th qtr. FY27, complete 4 Phase II ESAs/BEAs/Due Care Plans at priority sites; by 4th qtr. FY28, complete 2 Phase II ESAs at priority sites and 3 Phase II ESAs/ BEAs/Due Care Plans at non-priority sites. By grant period end, complete 3 remaining Phase II ESAs for non-priority sites.
c. Task Lead: QEP for Phase II ESAs, applicant oversight.
d. Outputs: 1 QAPP, 12 Phase II ESAs/HASPs/SAPs, 7 BEAs/Due Care Plans, ACRES updates.
<b>Task 3: Brownfield Plans and Cleanup Planning</b>
a. Project Implementation: 7 Brownfield Plans, which will utilize tax increment financing to leverage grant funds on priority sites and community wide. Plans will be reviewed by the BHBRA and approved by the City Commissioners at a public meeting. Estimated that 1 site will require a Cleanup Plan (Act 381 Work Plan) for state tax support, with state approval.
b. Anticipated Schedule: By 4th qtr. FY27, complete 2 Brownfield Plans at priority sites; by 4th qtr. FY28, complete 2 Brownfield Plans at priority sites; remaining 3 Brownfield Plans and 1 Cleanup Plan at non-priority sites are estimated to be completed by the end of the grant period.
c. Task Lead: QEP for plans, applicant oversight.
d. Outputs: 7 Brownfield Plans, 1 Cleanup Plan, 7 local Resolutions, 7 public hearings, 1 state regulatory review, ACRES updates.
<b>Task 4: Community Outreach, Programmatic, Travel, and Supplies</b>
a. Project Implementation: Activities include working with the EPA; procuring a QEP; preparing a Grant Work Plan; preparing for, attending, and participating in public hearings, municipal and BHBRA meetings; community outreach events; creating and disseminating EPA grant brochures; educating community groups and stakeholders about grant and brownfields; attending the National Brownfield Conference; preparing EPA quarterly/financial/performance reports.

- b. Anticipated Schedule: By 1st qtr FY27, select QEP; by 3rd qtr. FY27, hold 3 community outreach events, 1 in each target area; by 1st qtr. FY28, hold 1 education event; during the rest of the grant period, hold 1 additional community outreach event, as needed. Reporting completed quarterly and Federal Financial Reports (FFR) annually, as required by the Cooperative Agreement.
- c. Task Lead: Applicant will organize outreach efforts, and a QEP will assist with outreach efforts and draft required reporting with applicant review and approval.
- d. Outputs: Procurement of 1 QEP, 5 community outreach/educational events, 48 monthly BHBRA meetings, 16 quarterly reports, 4 FFR reports, educational and outreach materials, 1 trip to the National Brownfield Conference for 4 BHBRA members and 1 city staff, 1 final technical report.

**3.e. Cost Estimates**

Budget Categories	Task 1: Phase I ESAs	Task 2: Phase II ESAs	Task 3: Brownfield Plans and Cleanup Planning	Task 4: Community Outreach/ Programmatic	Total
Personnel	\$0	\$0	\$0	\$25,000	\$25,000
Travel	\$0	\$0	\$0	\$8,000	\$8,000
Supplies	\$0	\$0	\$0	\$1,325	\$1,325
Contractual	\$98,000	\$263,000	\$83,500	\$19,800	\$464,300
Other	\$0	\$0	\$0	\$1,375	\$1,375
Total Direct Costs	\$98,000	\$263,000	\$83,500	\$55,500	\$500,000
Indirect Costs	\$0	\$0	\$0	\$0	\$0
Total Budget	\$98,000	\$263,000	\$83,500	\$55,500	\$500,000

~88.9% of the Assessment Grant is designated for site specific Phase I and II ESAs and cleanup planning. 5% of the budget is designated as administrative personnel costs, not including the financial and performance reporting costs (considered allowable programmatic costs not subject to the 5% limitation).

- **Task 1, Contractual Costs:** 28 Phase I ESAs at average cost of \$3,500 = **\$98,000 total.**
- **Task 2, Contractual Costs:** 12 Phase II ESAs at average cost of \$19,000 = \$228,000; 7 BEAs/Due Care Plans at average cost of \$5,000 = \$35,000; **\$263,000 total.**
- **Task 3, Contractual Costs:** 7 Brownfield Plans at average cost of \$10,500 = \$73,500; 1 Cleanup Plan (Act 381 Work Plan) at average cost of \$10,000; **\$83,500 total.**
- **Task 4 Costs: \$55,500 total; Personnel:** 500 hours at \$50/hour = \$25,000 total; **Travel:** travel for 4 BHBRA members and 1 city staff including airfare, lodging, food, and expenses at an average cost of \$1,600 per person = \$8,000 total; **Supplies:** supplies for meetings, outreach events, printing, web hosting, etc. at a cost of \$1,325; **Contractual:** 16 quarterly reports at average cost of \$700 = \$11,200; preparation of 4 FFRs at average cost of \$600 per report = \$2,400; preparation of 1 final technical report for a total cost of \$1,200; preparation for 5 community open house/outreach events at average cost of \$1,000 per event = \$5,000; \$19,800 total. **Other:** conference registration fees for 4 BHBRA members and 1 city staff at average cost of \$275 per person = \$1,375.

**3.f. Plan to Measure and Evaluate Environmental Progress and Results**

The city and BHBRA will measure, track, and evaluate progress of outputs created and positive results of outcomes generated. As project phases are completed, assessment information and the reports produced (**outputs**) will be described in the EPA’s Assessment, Cleanup, and Redevelopment Exchange System (ACRES), grant quarterly reports, and a performance dashboard that will be posted to the city’s website and updated annually. These reporting formats will also describe the positive **outcomes** as a result of leveraged grant funds, including number of full-time equivalent jobs retained and created, number of sites/acres that have been assessed and prepared for reuse, exposure concerns that have been mitigated or reduced, number of affordable housing units built or rehabbed, infrastructure reused, acres preserved for community greenspace and wildlife habitats, and desired health outcomes in the sensitive populations who work, live, and play within the target areas.

#### **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

##### 4.a.–4.c. Organizational Capacity, Organizational Structure, and Description of Key Staff

The BHBRA is made up of nine volunteers including two City Commissioners; one former mayor of the city; and six other private citizens, nonprofit leaders, and business owners who are actively engaged in the community. Educational events and creation of educational materials will be conducted early in the grant period to support the BHBRA's established policies and to streamline review of project applications for the use of grant funds to maximize community benefits. BHBRA monthly meetings are also attended by the City Manager/Director of Community and Economic Development, Alexandre Little, who will play a key role in the implementation of the grant funds and will act as the grant program manager. Mr. Little has over 50 years of public sector service experience, managing over \$69 million in both federal and state grant-funded projects for the city, addressing needs such as lead water line replacement, water plant improvements, and housing development. Mr. Little has vast experience in cross-agency partnerships in his role with the city, including working with the EPA Technical Assistance to Brownfields (TAB) program; U.S. Department of Housing and Urban Development (HUD) and its online reporting system, the HUD Environmental Review Online System (HEROS); state regulatory agencies; the State Land Bank Authority; state universities; the City Commission; and local boards. Mr. Little is responsible for day-to-day management of the city, working closely with the city mayor and implementing the policies put in place by the City Commission. As the grant program manager, Mr. Little will work closely with the BHBRA, the city finance director, the city outreach specialist, and the grant community partners to implement the grant activities. Rhonda Hildebrand, the city's contracted Finance Director, will be directly responsible for financial implementation of the grant, including fund drawdowns and review of all quarterly and annual reports prepared by the Qualified Environmental Professional (QEP), which will be selected through a competitive bidding process. Ms. Hildebrand has over 20 years of experience in governmental accounting, including assistance on grants from the Department of Justice, HUD, EPA, U.S. Treasury, and State of Michigan. Dane Rasmussen, the city's Waterfront Restoration and Revitalization Project Manager/Community Engagement and Outreach specialist, will also support successful implementation of community engagement. Mr. Rasmussen has experience soliciting community input for implementation of EPA Highwater Grant funds on Riverview Drive within the **Riverfront** target area, as well as a National Oceanic and Atmospheric Administration Habitat Restoration Grant for the Ox Creek Summit and a Michigan Department of Natural Resources Spark Grant for the Hall Park revitalization within the **Ox Creek Corridor**.

##### 4.d. Acquiring Additional Resources

The city will solicit assistance from the EPA TAB program in writing a Request for Proposal to procure a QEP, which will assist with the grant tasks outlined above. The city will also work with the Michigan Department of Environment, Great Lakes, and Energy on cleanup efforts and funding and utilize other free services from local, regional, and state offices. The BHBRA will work closely with the EPA Project Officer to identify additional resources available to successfully implement the grant.

##### 4.e. Currently Has or Previously Received an EPA Brownfields Grant

###### 4.e.(1) Accomplishments

The BHBRA was successful in securing and implementing a FY 2009 EPA Community-wide Hazardous Substance (\$100,000) and Petroleum (\$200,000) Assessment Grant (CA BF-00E91801). This grant started 9/23/2009 and ended 12/31/2012 and assessed 12 sites within the city. The outputs—(12 Phase I ESAs, 11 Phase II ESAs, 5 cleanup planning activities, and 3 supplemental assessments—addressed 25.65 acres, resulting in over 20 new jobs and approximately \$3,020,000 in investment. Information was accurately reported to the EPA via ACRES.

###### 4.e.(2) Compliance with Grant Requirements

The BHBRA has consistently met the requirements for Work Plan development, QAPP development, eligibility demonstrations, SAPs, HASPs, quarterly/MBE/WBE/FFR reports, ACRES reporting, and community notification of progress. The FY 2009 EPA grant was closed with no known funds remaining.

**THRESHOLD CRITERIA RESPONSES  
CITY OF BENTON HARBOR, MICHIGAN**

**(1) Applicant Eligibility**

a. The City of Benton Harbor is a Michigan General Purpose Local Unit of Government and is eligible to receive funding through the U.S. Environmental Protection Agency (EPA) Brownfield Assessment Grant program.

b. The City of Benton Harbor is not exempt from federal taxation under section 501(c)(4) of the Internal Revenue Code.

**(2) Community Involvement**

As priority site projects proceed, it is the city's intention to engage the community and solicit input through partner connections, monthly Benton Harbor Brownfield Redevelopment Authority (BHBRA) meetings (which are held in person and also streamed online with the ability to submit public comment through the city clerk in advance), Downtown Development Authority meetings, Developer Days coordinated with Cornerstone Alliance, and community outreach events. The BHBRA will establish three in-person educational outreach events at a public, easily accessible location that will inform citizens on the type of assessments that can be conducted with the EPA Assessment Grant funds and solicit feedback on any new sites and desired outcomes. One of these educational events will be specifically in partnership with Total Wellness by Choice to promote environmental awareness, supported with assessment data, and promote positive health outcomes accomplished through the grant. The BHBRA will partner with Cornerstone Alliance to establish a minimum of two Developer Days over the grant period to connect with experienced developers, providing education and assessment resources to bring projects to fruition and align assessment activities on sites with proposed redevelopment and reuse. Advertisements will be placed in existing retail establishments, convenience stores, and restaurants in the Core Business District. One to two planning meetings with the Project Need Foundation will be held upon implementation of the grant to determine the best means of disseminating information (e.g., location, time, format) that will be received by sensitive populations in our target areas in order to build connections and solicit meaningful input. All community input will be responded to through each community partner and will be used in assessment decision-making. The city website and social media platforms including LinkedIn will be utilized to advertise EPA grant-funded success stories. The city and BHBRA will also produce and distribute brochures, grant fact sheets, and performance dashboards.

**(3) Expenditure of Existing Grant Funds**

The City of Benton Harbor does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

**(4) Contractors and Named Subrecipients**

N/A, a contractor/subrecipient has not been procured or named.