



City of South Haven

City Hall • 539 Phoenix Street • South Haven, Michigan 49090-1499

Telephone (269) 637-0700

NARRATIVE INFORMATION SHEET

R05-24-A-027

1. **Applicant Identification:** City of South Haven, Michigan
539 Phoenix Street
South Haven, MI 49090

2. **Funding Requested**
 - a. Assessment Grant Type: Community-wide
 - b. Federal Funds Requested: \$300,000

3. **Location:** South Haven, Van Buren County & Allegan County, Michigan

4. **Target Area and Priority Site Information:**

Target Areas: Ward 1 and Ward 2 of the City of South Haven (census tracts 26159010400 and 26159010500)

 - *Priority Site 1:* Trailside-Everette Park, 900 and 1070 Indiana Avenue, South Haven, MI (Ward 1, CT 26159010400)
 - *Priority Site 2:* Overton site, 229 Elkenburg Street, South Haven, MI (Ward 1, CT 26159010400)
 - *Priority Site 3:* Sherman-Hills, 210 71 ½ Street, South Haven, MI (Ward 2, CT 26159010500)
 - *Priority Site 4:* 554 Green Street, South Haven, MI (Ward 2, CT 26159010400)

5. **Contacts**
 - a. Project Director: Griffin Graham, Assistant City Manager, Brownfield
Redevelopment Authority Secretary
269.637.0773
ggraham@southhavenmi.gov
539 Phoenix Street
South Haven, MI 49090

 - b. Chief Executive/Highest
Ranking Elected Official: Mayor Scott Smith
269.906.0334
scottsmith@south-haven.com
539 Phoenix Street
South Haven, MI 49090

6. **Population:** City of South Haven (population 3,964)



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7. Other Factors:

Other Factors	Page #
Community population is 10,000 or less.	1, 4
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
The priority site(s) is in a federally designated flood plain.	N/A
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the priority site(s) will incorporate energy efficiency measures.	N/A
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	1, 3
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 located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	N/A

8. Letter from the State or Tribal Environmental Authority (Attached)

9. Releasing Copies of Applications: N/A



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



PHILLIP D. ROOS
DIRECTOR

October 26, 2023

VIA EMAIL

Mayor Scott Smith
City of South Haven
539 Phoenix Street
South Haven, Michigan 49090

Dear Mayor Smith:

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 2024

Thank you for your notice and request for a letter of acknowledgment for the city of South Haven'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 South Haven is applying for a \$300,000 Community-wide Brownfield Assessment Grant. As a general-purpose unit of local government, the city of South Haven is an eligible grant applicant.

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

Sincerely,

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

cc: Doug Koop, EGLE

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

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

The City of South Haven (**geographic area**) is in Van Buren County, Michigan, although a small portion extends into Allegan County to the north. South Haven is a smaller city, occupying just 3.49 square miles, with a population of 3,964 citizens. Because of its position on Lake Michigan, at the mouth of the Black River, it has always been a port city. The South Haven community has enjoyed a strong combination of manufacturing, professional, retail, and leisure/hospitality employment. However, since the 1980s, much of the community's manufacturing employment has either relocated or dissolved, leaving behind a legacy of sites contaminated by historical use. While South Haven has remained a popular summer resort destination because of its recreational harbor and beaches, as well as its convenient location close to Chicago, the local economy continues to shift away from higher-paying manufacturing and professional jobs to a greater concentration of lower-wage service and retail positions. This is creating an increasing gap between prevailing wages and price points for local housing options, making the recruitment and retention of residents much more difficult. The city, often referred to as a "Beach Town," has a 33.3% housing stock vacancy rate, which includes only 0.1% vacant rental units and 33.2% seasonal and other housing units (Michigan State Housing Development Authority [MSHDA] Southwest Housing Partnership J). When there are too few homes and apartments available for everyone, local residents with the most money to spend and out-of-town folks looking for a secondary vacation home are able to outcompete everyone else for vacation rentals. The greater the scarcity of housing, the more this competition will drive rents and home prices up. This is commonly described as the "Missing Middle," as households with entry-level professional occupations and blue-collar "workforce" positions are squeezed by both decreasing affordability and stagnant wage levels.

Although the outcomes proposed in this EPA Grant application will benefit the entire community, the **primary target areas** will be Ward 1 and Ward 2 of the city, which are included in the Climate and Economic Justice Screening Tool (CEJST) disadvantaged census tracts 104 and 105. Census tracts (CTs) 104 and 105, which contain the industrial zones of the city, are characterized by the highest minority rates in the city (30.9% and 29.1%, respectively), the lowest income populations (68th and 80th percentiles, respectively), and the most contaminated water and wastewater, with CT 104 in the 95th percentile for underground storage tanks and releases and CT 105 in the 94th percentile for toxic wastewater discharges. Contaminated sites within the target area have the potential to disproportionately impact adjacent, low-income, underserved residents. Impacts include chronic and acute diseases or ailments, reduced property values, and blight, which perpetuate a cycle of poverty. This EPA Grant would act as a catalyst for the reuse and redevelopment of these sites by providing funds for Phase I and II environmental assessments, hazardous material building surveys including lead and asbestos surveys, due care, and cleanup planning, including planning for climate mitigation strategies. Without upfront funding to determine the potential environmental risks associated with these properties, they will remain stalled in a legacy of uncertainty. Knowledge is key to turning this legacy around and helping emerging entrepreneurs reinvest in their communities, breaking the cycle of neglect, blight, and unaddressed contamination. The information gained from assessing a site will also help to attract additional funding from local, state, and federal sources as many of these contaminated sites located within the target area impact nearby neighborhoods and are prime locations for housing development.

1.a.ii. Description of the Priority Brownfield Site(s)

Within the City of South Haven, there are 98 sites of known contamination (over 30% of the known brownfield sites throughout Van Buren County). The city has identified the following priority sites for this EPA Grant application, which demonstrate the large environmental challenges experienced by our target area communities and are prime locations for redevelopment.

1. **Trailside-Everette Park:** In the heart of Ward 1 (CT 104) this 36.84-acre property was formerly occupied with over 340,000 square feet of industrial buildings and a now-abandoned railroad right-of-way. A portion of the site has been redeveloped into 11 single-family homes and 9 duplexes, with additional phases of development anticipated. The project has been delayed at various stages and even transferred developers due to the existing site conditions. The property is a known site of contamination based on the presence of multiple contaminants, including metals, causing redevelopment challenges to protect the health and safety of future residents, making the site a priority for the city.
2. **Overton:** The Overton site on the city's south side (Ward 1, CT 104) is preferable for residential housing in many ways, based on the proximity of services, community assets, and employment options. Located across Elkenburg Street, just north of Trailside-Everette Park, the property was historically developed with an industrial manufacturing building, the S.E. Overton Company. The site is a known site of contamination as historical operations included the use of stains, paints, thinners, etc., which contain volatile and semi-volatile organic compounds (VOCs). Site investigations over the years have identified VOCs, polynuclear aromatics (PNAs), and metals, causing redevelopment challenges for residential housing as engineering controls and barriers are anticipated. Additionally, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) has declared the site a part of the "Elkenburg Area of Interest" as hazardous per- and polyfluoroalkyl substances (PFAS) have been detected at the adjacent site; however, the source of contamination has yet to be identified.
3. **Sherman-Hills:** Within Ward 2 (CT 105) on the city's far northeast corner, this property has positive aspects for future residential development but is more challenging due to its location and higher development costs. At one time, the site was planned for 160 single-family homes across the 59.6 acres. While the site is currently vacant, previous stalled residential developments have completed an unknown level of site grading and infrastructure. The site is a known site of contamination due to the presence of arsenic in Black River sediment and dredged sediments placed on the north end of the site. Additional delineation and characterization of the site's soils and engagement with regulators on existing conservation easements to allow for residential redevelopment are anticipated.
4. **554 Green Street:** Currently home to the South Haven Public Schools administrative offices within Ward 2 (CT 104), the 3.24-acre site has been identified for a future residential development as the school makes plans to relocate to another site in the community. The site is bordered by single-family detached residential, a restaurant to the east, and the Peterson Creek to the south. The property is a Part 213 Closed Leaking Underground Storage Tank (LUST) site and has two registered underground storage tanks still in place. Additional site investigation is anticipated to support the relocation of the school offices and create reuse plans for a residential development.

1.a.iii. Identifying Additional Sites

The City of South Haven Brownfield Redevelopment Authority (CoSHBRA) will solicit additional sites from community partners via educational outreach effort. Using its existing application process and policy, which will be updated to include the new MSHDA Brownfield eligible activities, in concert with disadvantaged communities (CEJST) and the existing City Master Plan and Economic Development Strategic Plan, the CoSHBRA will evaluate and determine if grant support to a particular site is needed to understand potential or existing risks to the community and help assist with the safe redevelopment of a site. Additionally, the city wants to plan for and manage future growth and wise development on lands adjacent to the Lake Michigan coast, including inventorying sites of contamination along the coast to avoid movement of contamination into the Great Lakes; incorporating resilient coastal management principles; and protecting, preserving, restoring, enhancing, and wisely developing coastal areas for use and enjoyment to improve quality of life.

1.b. Revitalization of the Target Area

1.b.i. Reuse Strategy and Alignment with Revitalization Plans

In July 2018, the City of South Haven, in concert with Community Research Services, LLC, released a Housing Market Analysis that declared the **Overton**, adjacent **Trailside-Everette Park**, and **Sherman-Hills** priority sites as specific locations of interest for housing, which have had momentum in recent years. In November 2018, the city adopted a new Master Plan which involved 22 public meetings, 11 work sessions with a consultant, 3 neighborhood workshops, an issue identification workshop with the Downtown Development Authority, a bus tour on the M-43/I-196 Business Loop, a design charrette for the **Overton** property, and a community open house on the land use maps in December 2017. In addition to the public meetings, a citywide survey was mailed to citizens which resulted in a 26.9% reply rate. The Master Plan includes a chapter focused on the **Overton** site, which summarizes the neighborhood and design charrette ideas that emerged during the Master Plan community engagement events. Major elements of each plan involved residential options including single-family townhomes, two-story townhomes, and three-story garden apartments; both for-sale and rent options were envisioned. Other key elements included a community clubhouse or neighborhood recreation center. The Master Plan included future zoning barriers and ownership options (public or private). The work envisioned with this grant is aligned and supports the community's plans and priorities for residential redevelopment on these three key properties.

In January 2020, South Haven adopted an Economic Development Strategic Plan, which features an economic development strategy and the city's key strengths, weaknesses, threats, and opportunities. Primary weaknesses and threats identified included the high cost of living, lack of housing diversity, overreliance on tourism, decline of small businesses, and lack of room to expand—which requires a focus on underused, previously developed brownfield properties that typically have more barriers to redevelopment. In response, the city engaged a consultant in 2023 to conduct a housing gap analysis. The analysis focused on the greater South Haven community, including the city and South Haven Township. The study found that the majority of the communities' population (2,237 residents) make \$50,000 or less, but that only 882 housing options are at their respective affordable prices, indicating an affordability gap of 1,355 units. Providing new housing options at this price point will be difficult without some form of financial incentive or subsidy. Redevelopment Plans for **554 Green Street** could target this Missing Middle gap, addressing this main weakness, or could incorporate a mixed-use development to expand neighborhood services.

1.b.ii. Outcomes and Benefits of Reuse Strategy

Focusing on contaminated brownfield sites in urban, low-income areas will accomplish four major goals: (1) begin eliminating the sites and conditions that may be contributing to the degradation of susceptible populations in our underserved communities; (2) eliminate blight and provide opportunities for energy-efficient, affordable, clean housing or clean areas for recreation or community gardens; (3) encourage additional investment and revenue generation, creating jobs and business opportunities; (4) improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments. We anticipate 480 housing units could be constructed on our priority sites, which could provide over \$25M in investment, generating as much as \$3M in annual taxes. Without the knowledge and resources, it is difficult to understand what cleanup, planning, or funding is necessary to prepare a site for reuse. The EPA Grant provides the impetus for attracting and leveraging both public and private investment on brownfield sites including state grants and loans, bank financing, private funding, tax increment financing through a Brownfield Plan, etc.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse

Michigan's brownfield laws allow the City of South Haven Brownfield Redevelopment Authority (CoSHBRA) to develop Brownfield Plans for eligible project sites. These plans capture future tax increment from new investment on the property to pay for Phase I and II site assessments, Baseline

Environmental Assessments, Due Care Plans, demolition, soil and groundwater cleanup, and lead and asbestos abatement. When the Land Bank is utilized, or when a project involves affordable housing, Brownfield Plans can pay for preparing a site, installation of infrastructure, and housing cost gaps to support a site reuse plan. The EPA Grant can be used to develop Brownfield Plans; the CoSHBRA can then use the tax increment capture from projects to reimburse eligible brownfield activities and, once the developer is reimbursed, capture another five years for the Local Brownfield Revolving Fund (LBRF). The LBRF is locally controlled and can only be used for eligible activities on other known or perceived brownfield sites. Thus, the grant monies would truly act as seed money to leverage future brownfield redevelopment activities. The CoSHBRA has adopted and successfully implemented 9 Brownfield Plans to date, which will capture millions of dollars in tax increment to reimburse developers for cleanup, demolition, and due care activities.

The CoSHBRA will pursue State 128a Brownfield Assessment funds to conduct free assessments on brownfield sites. Also, the CoSHBRA has experience accessing and implementing EGLE Brownfield Redevelopment Grants and Loans to fund site investigation, cleanup, demolition, etc. on projects. It is anticipated that EGLE will have \$15 million in grant funds available in FY 2024. The CoSHBRA was successful in collaborating with the state on preliminary investigations of the **Overton** site in 2022-2023.

1.c.ii. Use of Existing Infrastructure

The entire City of South Haven and the priority sites are served by existing municipal utilities. When a Land Bank is utilized, or when a project involves affordable housing, infrastructure improvements are eligible activities that can be reimbursed through tax increment financing in a Brownfield Plan. The city continues to upgrade and improve utilities in the target areas by leveraging Downtown Development Authority and Local Development Finance Authority funds to pursue outside funding, such as the Safe Route to School Grants and Congestion Mitigation and Air Quality Improvement Program Grants, for various activities. Some of these grant funds are incorporated in the city's 2020–2027 Capital Improvement Plan, which identifies \$418,810 major and local street improvements and \$473,994 sidewalk improvements within the right-of-way for our priority sites along Aylworth Avenue and Indiana Avenue (**Overton** and **Trailside-Everette Park**), 2nd Avenue (**Sherman-Hills**), and Green Street just east of **554 Green Street** which will be completed over the next four years.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

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

The City of South Haven is seeking an EPA Community-wide Brownfield Assessment Grant because it does not have the financial resources to address these large, legacy sites without assessment support. Since the 1980s, much of the community's manufacturing employment has either relocated or dissolved, shifting the community away from higher-paying manufacturing and professional jobs to a greater concentration of lower-wage service and retail positions, leaving large, blighted lots within the city's core Ward 1 and Ward 2 neighborhoods. The communities in Ward 1 and Ward 2 experience economic, social, and environmental challenges as a result. The City of South Haven is a small community of just 3,964 citizens, which represents just over 5.2% of the county population but contains a disproportion amount, 30% (98 sites), of the known sites of contamination in the county (Michigan.gov/EGLE). Census tracts (CTs) 104 and 105 have a poverty rate of 18% and 17.3%, respectively, compared to 15.5% in Van Buren County and 15% statewide. Median Household Incomes are also lower in the city (\$55,469) than in the overall county (\$61,549) and state (\$63,202). And yet, an increasing number of housing units are priced above the Area Median Income (AMI) as the median home value in the South Haven Community is \$286,000, requiring a minimum household income of \$86,000. Providing new housing options at a lower price point to target our AMI will be difficult without some form of financial incentive or subsidy.

2.a.ii. Threats to Sensitive Populations

2.a.ii.(1) Health or Welfare of Sensitive Populations

The sensitive populations in our target areas (i.e., minority population and elderly over the age of 65; see table below) are impacted by poverty status. Wards 1 and 2 (CTs 104 and 105), which contain the industrial zones of the city, are in the 81st and 88th percentile for socioeconomic factors (including low-income population – 65th and 77th; black, indigenous, people of color – 69th and 65th; educational attainment – 70th and 74th; linguistic isolation – 67th and 74th; population under age 5 – 63rd and 94th; population over age 64 – 88th and 58th; unemployment – 15th and 61st; and housing burden – 81st and 52nd, respectively) (MI EJSscreen). Overwhelmingly, the social and institutional inequities that cause poverty, especially in minority communities like our target Wards 1 and 2 (CTs 104 and 105), drive health outcomes that are significantly worse than for wealthier, non-minority populations. These outcomes are exacerbated by environmental contamination, which weakens immune systems and causes asthma, cancer, and other diseases. Our elderly population is additionally susceptible to the effects resulting from contamination as immune systems decline with age. Furthermore, of the 3,776 households in South Haven, 1,511 (40%) are cost-burdened, paying over 30% of their income toward housing expenses, putting CT 104 in the 81st percentile for housing burden. Of these cost-burdened households, 659 pay between 30% and 50% of their income toward housing expenses and 852 are severely cost-burdened, paying over 50% of their income toward housing expenses. The majority of cost-burdened households earn below \$50,000 per year. With such a large portion of their income spent on housing, this population is more likely to access food stamps and Supplemental Nutrition Assistance Program (SNAP) benefits; in fact, 23.3% (CT 104) and 21.3% (CT 105) receive food stamps/SNAP, higher than the rate of the county (13.1%), the state (12.6%), and nation (11.4%). 9% (CT 104) and 13.8% (CT 105) of the city have no health insurance, rates higher than at the county (8.4%) and state level (6.1%). The effects of exposure to environmental contaminants disproportionately impact this poorer city population with limited access to health care systems and benefits.

Generationally, these minority residents lived where they were able to buy homes, which to their detriment was located next to the industrial corridor on contaminated land. CTs 104 and 105 are both in the 75th percentile for environmental effects (proximity to cleanup sites – 98th and 88th, proximity to hazardous waste facilities – 46th and 58th, impaired water bodies – 73rd, proximity to solid waste sites and facilities – 63rd, lead paint indicator – 69th and 39th, proximity to Risk Management Program sites – 85th and 63rd, and wastewater discharge indicator – 38th and 99th percentiles, respectively). Through this EPA Grant, the target areas have an opportunity to assess, understand, and manage the environmental risks present in their communities, which is also necessary to leverage additional funding to address and clean up the risks, with a focus on providing more attainable housing options.

Target Area	Sensitive Populations Percentile	Elderly Population (65+)	Median Income	Poverty Rate	% Minority
CT 104	51st	22.1%	\$57,500	18.0%	30.9%
CT 105	48th	18.4%	\$46,875	17.3%	29.1%
Van Buren County	46th	17.0%	\$52,351	15.5%	21.4%
Michigan	N/A	16.3%	\$54,938	15.0%	27.6%

2.a.ii.(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

According to the EPA, being exposed to environmental contamination has been linked to different human diseases and conditions. There are many opportunities for residents adjacent to our priority sites to be exposed to contaminated soil, groundwater, surface water, and airborne contamination that increase the potential to contract a disease or adverse health condition. Van Buren County has a higher cancer mortality rate (171.1; age-adjusted data, per 100,000) than the state (160.6) or country (149.4)

(CDC Wonder, 2020). The cancer mortality rate is even higher for African Americans in Van Buren County (209). Specific data available for our census tracts include current asthma prevalence among adults, which is higher in CT 104 (11.6%) and CT 105 (11.8%) than the county (10.9%), state (11.5%), and country (9.7%) (CDC PLACES, 2021), which is well known to be directly related to high ozone impact (CT 104 – 100th percentile, and CT 105 – 99th percentile, MI EJScreen). Additionally, CTs 104 and 105 are in the 79th and 92nd percentile for heart disease, respectively (Climate and Economic Justice Screening Tool, or CEJST).

Two of the three census tracts covering the City of South Haven are identified as disadvantaged according to the CEJST, primarily due to water and wastewater factors, low-income populations, and health data. An EPA Grant will allow the city to identify, assess, and evaluate the risks associated with the priority sites, as well as other contaminated sites, ultimately developing cleanup plans that can create more equitable and healthy living conditions for local residents.

2.a.ii.(3) Environmental Justice

2.a.ii.(3)(a) Identification of Environmental Justice Issues

All the priority sites/target areas for this grant are located within a disadvantaged census tract according to the CEJST. A person's well-being should not be determined by their race, location, or income. It is an environmental injustice that residents adjacent to our priority sites are disproportionately affected by the risks and socio-economic impacts brownfield sites have on their community. CT 104 is identified as disadvantaged due to the following factors: low income (household income is less than or equal to twice the federal poverty level – 68th percentile), higher education non-enrollment (percent of the census tract's population 15 or older not enrolled in higher education – 13%), and underground storage tanks and releases (density of leaking underground storage tanks and number of all active underground storage tanks within 1,500 feet of the census tract boundaries – 95th percentile). CT 105 is identified as disadvantaged due to the following factors: low income (household income is less than or equal to twice the federal poverty level – 80th percentile), heart disease (people ages 18 years and older who have been told they have heart disease – 92nd percentile), higher education non-enrollment (percent of the census tract's population 15 or older not enrolled in higher education – 15%), and wastewater discharge (toxic concentrations at parts of streams within 500 meters – 94th percentile). Additionally, CTs 104 and 105 are ranked 61st and 80th CDC/ATSDR Social Vulnerability Index, respectively, due to factors like socioeconomic status, household characteristics, racial and ethnic minority status, or housing type and transportation. Lastly, and as described above, the city also has a high need for sustainable housing. CT 104 is in the 81st percentile for housing burden (percent of households spending over 30% of income on housing costs), which is the most burdened census tract in the entire county (MI EJScreen).

2.a.ii.(3)(b) Advancing Environmental Justice

Housing has been designated as a high need for the City of South Haven. The City of South Haven Brownfield Redevelopment Authority (CoSHBRA) would utilize this EPA Grant to support the construction of new affordable, sustainable, and equitable housing for all persons. Using grant funds for smaller projects, or mixed-use project sites, provides an opportunity for federal funds to positively impact very small businesses and entrepreneurs. Further, targeting Wards 1 and 2 will support the diverse and underserved community that has not previously had a chance to access these funds and receive this level of environmental investigation and attention, allowing the CoSHBRA to identify risks, cleanup sites, and incentivize diverse development. The CoSHBRA, Land Bank, and our community partners can bring resources to these communities to safely reuse sites for the construction of affordable housing, create new opportunities and jobs for building generational wealth, improve residents' well-being by mitigating environmental risks, and support the reuse of once vacant buildings and lands. These projects will not cause the displacement of residents or businesses in the target areas.

2.b. Community Engagement

2.b.i.–2.b.ii. Project Involvement and Project Roles

Organization & Contact	Involvement in project
Ward 1 Action Committee Letitia Wilkins, President lwilkins@southhavemi.gov	Neighborhood/community-based group—Secure input from the community on priorities, disseminate project updates, and facilitate neighborhood communications.
South Haven Area Chamber of Commerce Kathy Wagaman, Executive Director director@southhavenmi.com	Promote outreach events to local and small businesses, and post updates on their website pertaining to the CoSHBRA programs and grant opportunities.
Land Information Access Association Matt Cowall, Executive Director mcowall@liaa.org	Partner on community planning and development to incorporate resilient coastal management principles into Master Plan.
We Care Community Resource Center Erika Morrison, Executive Director erika@wecare-inc.org	Connection to low-income and minority families/youth in target communities; provide input on priority site reuse.
South Haven Region Business Hub Debi Howe, Executive Director; [REDACTED]	Provide targeted support, mentoring, and connections to funding for entrepreneurs and small businesses.
Market Van Buren Zach Morris, Executive Director morrisz@marketvanburen.org	Regional economic development organization assisting with position and reuse of sites.

2.b.iii. Incorporating Community Input

As these priority site projects advance, there will be ample opportunities to engage the community in regularly scheduled public meetings of the city, notably the Local Development Finance Authority and CoSHBRA. At the early stages of the EPA Grant, the CoSHBRA will convene several in-person community open houses. At these meetings, new information about the CoSHBRA’s programs and available resources will be presented; feedback will be sought and a solicitation for any new sites will also be prepared. These open houses will allow target area residents to provide input on the issues, share concerns, and potential reuse strategies for the priority sites and other sites in their neighborhoods to be discussed. Additionally, the CoSHBRA will work with the Ward 1 Action Committee to obtain input on reuse strategies. CoSHBRA staff and/or our brownfield consultant will respond to this input, ensuring meaningful discourse and action. Efforts will be made to inform and notify residents and businesses in the target communities and citywide through our partners, mailings, or posting information on the city’s social media, and at local retail/restaurant establishments, churches, community centers, and convenience stores. It will be critical to identify opportunities to interact with underserved community members in the city and target areas during times they can meet, which may not be during normal business hours due to their work schedules. We will also publicize programs, minutes, applications, and successes through the city website and our community-based project partners’ websites. The CoSHBRA will utilize social media platforms including Facebook, LinkedIn, and Twitter, allowing broad community access and input. Factsheets, brochures, and performance dashboards will continue to be used and distributed.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Description of Tasks/Activities and Outputs

The Applicant is not charging salary and fringe dollars for programmatic/administration activities for any tasks noted below. Implementation schedule will meet 35% within 18-month spend rate.

Task 1: Phase I Environmental Site Assessments (ESAs)
<i>i. Project Implementation:</i> 8 Phase I ESAs on priority sites in target communities. 5 Phase I ESAs on non-priority sites chosen by the CoSHBRA, with community input.

<p><i>ii. Anticipated Schedule:</i> Complete 4 Phase I ESAs on priority sites by 4th qtr. FY25 and 4 by 4th qtr. FY26; for 5 non-priority sites, we estimate completing 1–2 Phase I ESAs every 3 qtrs.</p>
<p><i>iii. Task Lead:</i> Qualified Environmental Professional for Phase I ESAs, Applicant oversight</p>
<p><i>iv. Outputs:</i> 13 Phase Is, eligibility demonstrations, site access agreements, ACRES updates</p>
<p>Task 2: Phase II Environmental, Baseline Environmental Assessments/Due Care Plans</p>
<p><i>i. Project Implementation:</i> Completion of Quality Assurance Project Plan (QAPP), completion of Sampling Plans and Health and Safety Plans for each Phase II. 6 Phase II ESAs on priority sites in target communities. 3 Phase II ESAs on non-priority sites as determined by the CoSHBRA, with community outreach event input. For contaminated sites (estimated 6), completion of Baseline Environmental Assessments (BEAs) for liability protection and Due Care Plans to address “continuing obligations.”</p>
<p><i>ii. Anticipated Schedule:</i> Complete 4 Phase II/BEAs/Due Care Plans at priority sites by 4th qtr. FY25 and 2 by 4th qtr. FY26; for the remaining 3 non-priority sites, we estimate 1–2 Phase IIs completed every 3 qtrs.</p>
<p><i>iii. Task Lead:</i> Qualified Environmental Professional for Phase II ESAs, Applicant oversight</p>
<p><i>iv. Outputs:</i> 1 QAPP, 9 Phase IIs and Sampling and Analysis Plans/Health and Safety Plans, 6 BEAs/Due Care Plans, ACRES updates</p>
<p>Task 3: Brownfield Plans and Cleanup Planning</p>
<p><i>i. Project Implementation:</i> 6 Brownfield Plans (estimate) to utilize tax increment financing to leverage grant funds on priority sites and community wide. Plans will be reviewed by the CoSHBRA and local unit of government and approved by County Commissioners at a public hearing. Estimated that 2 sites will require Cleanup Plans (Act 381 Work Plans) for state tax support, with state approval.</p>
<p><i>ii. Anticipated Schedule:</i> Complete 3 Brownfield Plans and 1 Cleanup Plan (Act 381 Work Plan) at priority sites by 4th qtr. FY25; remaining 3 Brownfield Plans and 1 Cleanup Plan (Act 381 Work Plans) at non-priority sites are estimated to be completed by the end of the grant term.</p>
<p><i>iii. Task Lead:</i> Qualified Environmental Professional for Plans, Applicant oversight</p>
<p><i>iv. Outputs:</i> 6 Brownfield Plans, 2 Cleanup Plans (Act 381 Work Plans), 6 Local Resolutions, 6 Public Hearings, 2 State Regulatory reviews, ACRES updates</p>
<p>Task 4: Community Outreach, Programmatic, Travel, and Supplies</p>
<p><i>i. Project Implementation:</i> Activities include working with EPA; a procuring Qualified Environmental Professional; preparation of Grant Work Plan; preparing for, attending, and participating in public hearings; municipal and CoSHBRA meetings; creating and disseminating brochures/flyers/webpages about the EPA Grant; educating and informing community groups and stakeholders about the grant and brownfields; community outreach events; attending the National Brownfield Conference; preparing EPA quarterly/financial/performance reports.</p>
<p><i>ii. Anticipated Schedule:</i> Community outreach efforts will be intense at the outset of the grant and will include 1 community open house in each target community by 3rd qtr. of FY25, 3rd community open house by 1st qtr. FY26, and monthly CoSHBRA meetings. Outreach efforts will continue throughout the grant term.</p>
<p><i>iii. Task Lead:</i> Applicant will plan/initiate outreach efforts, and a Qualified Environmental Professional will assist outreach efforts and do required reporting with Applicant as review.</p>
<p><i>iv. Outputs:</i> Procurement of 1 Qualified Environmental Professional, 5 community open house/education events, 48 monthly CoSHBRA meetings, 16 Quarterly Reports, 4 financial and MBE/WBE reports, numerous educational materials and outreach events, 1 trip to National Brownfield Conference for 3 CoSHBRA members and Director, final closeout report</p>

3.b. Cost Estimates

Budget Categories	Task 1: Phase I Assessments	Task 2: Phase II Assessments	Task 3: Brownfield Plans	Task 4: Community Outreach/ Programmatic	Total
Travel				\$6,000	\$6,000
Supplies				\$1,500	\$1,500
Contractual	\$45,500	\$204,000	\$32,000	\$11,000	\$292,500
Total Direct Costs	\$45,500	\$204,000	\$32,000	\$18,500	\$300,000
Indirect Costs					
Total Budget	\$45,500	\$204,000	\$32,000	\$18,500	\$300,000

83% of the Assessment Grant is designated for Phase I and II Environmental Assessments.

- Task 1, Contractual Costs: 13 Phase I site assessments at average cost of \$3,500 = **\$45,500 total**.
- Task 2, Contractual Costs: 9 Phase II site assessments at average cost of \$20,000 = \$180,000; 6 BEAs/Due Care Plans at average cost of \$4,000 = \$24,000; **\$204,000 total**.
- Task 3, Contractual Costs: 6 Brownfield Plans at average cost of \$4,000 = \$24,000; 2 Cleanup Plans (Act 381 Work Plans) at average cost of \$4,000 = \$8,000; **\$32,000 total**.
- Task 4: \$18,500 total; Travel Costs: Travel for 3 CoSHBRA members and Project Director including airfare, lodging, food, and expenses at an average cost of \$1,500 per person = \$6,000 total; Supplies Costs: supplies for meetings, outreach events, printing, web hosting, etc. at cost of \$1,500; Contractual Costs: 16 Quarterly Reports at average cost of \$500 = \$8,000; preparation for 5 community open houses at average cost of \$600 per event = \$3,000; \$11,000 total.

3.c. Plan to Measure and Evaluate Environmental Progress and Results

The CoSHBRA will track, measure, and evaluate our progress in achieving numerous outputs and outcomes in several ways throughout the grant program. First, assessment information (**outputs**)—including number of Phase I and II Environmental Site Assessments, Baseline Environmental Assessments, Due Care Plans, Brownfield Plans, and Act 381 Work Plans funded by the grants—will be documented in the EPA’s Assessment, Cleanup, and Redevelopment Exchange System (ACRES), grant Quarterly Reports, and a monthly updated Dashboard. This Dashboard also documents the outcomes or number of grant-related outreach activities, project investment leveraged, jobs created (or planned), jobs retained, and the number of grant-funded projects included in our **target areas**. This Dashboard will be available on the CoSHBRA’s website and distributed at meetings and events on a regular basis. Additionally, the CoSHBRA will track the number of sites/acres that have been prepared for reuse including those that have been cleaned up, blight removed, exposure concerns removed or minimized, and can be considered “safe” for reuse. The CoSHBRA, working with community partners, will track and evaluate long-term **outcomes**, such as affordable housing units built; jobs created; infrastructure reused; acres preserved for agriculture, open space, and improved habitats; improved property values; and health outcomes for our sensitive populations, especially those in our **target areas**, underserved communities, and near our priority sites.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i.– 4.a.iii. Organizational Capacity, Organizational Structure, and Description of Key Staff

The City of South Haven Brownfield Redevelopment Authority (CoSHBRA) is made up of eleven individuals, including a representative from the City Council, South Haven Public Schools, Lake Michigan College, and the Van Buren County Board of Commissioners. Other members include businesses, realtors, private citizens, etc. Project applications are reviewed by the CoSHBRA at publicly noticed monthly meetings, allowing municipal and citizen input. The CoSHBRA has created policies, applications, guidance, informational pieces, etc. intended to streamline the process of redeveloping brownfield sites while maximizing the benefit to the local community, ensuring the

timely expenditure of grant funds. Griffin Graham, Assistant City Manager, will serve as the primary grant administrator and project manager for the City of South Haven. Mr. Graham has a master's degree in public administration from Indiana University's O'Neill School of Public and Environmental Affairs and 5+ years of experience in local government management. Mr. Graham will be supported by other team members, as needed, including support staff, legal counsel, and administrative staff. Michele Argue, the city's Finance Director/Assessor, keeps financial track of all the Brownfield Plans for the city. The Government Finance Officers Association awarded the Certificate of Achievement for Excellence in Financial Reporting to the city for its FY 2021–2022 annual comprehensive financial report, which is the 23rd consecutive year the city has received this award. The city is an Equal Opportunity Employer and Provider and places a high value on diversity, equity, and inclusion as demonstrated by the recent adoption of a non-discrimination ordinance and updated Title VI Plan as well as the completion of a DEI Climate Assessment.

4.a.iv. Acquiring Additional Resources

The CoSHBRA will procure a Qualified Consultant to assist with the grant tasks as outlined above. The consultant will conduct Phase I and II Assessments, Baseline Environmental Assessments, Brownfield Plans, and Cleanup Plans and assist with community outreach efforts, reporting, and timely updates to ACRES required by the Cooperative Agreement. We will seek assistance from the Michigan Department of Environment, Great Lakes, and Energy (EGLE) on cleanup efforts and funding; other free services from local, regional, and state offices; EPA; and the Technical Assistance to Brownfields (TAB) Communities Program. The CoSHBRA will work closely with the EPA Project Officer to identify additional resources that may be available to successfully implement the grant.

4.b. Past Performance and Accomplishments

4.b.ii. Has Not Received an EPA Brownfields Grant but Has Received Other Federal or Non-Federal Assistance Agreements

4.b.ii.(1) Purpose and Accomplishments

The City of South Haven has not received an EPA Brownfields Grant in the past but has received other federal assistance. In 2020, the City of South Haven was awarded \$528,639.54 from the State Revolving Fund, \$776,919.61 from the Drinking Water Revolving Fund, and \$866,502.05 from the Michigan Economic Development Corporation to reconstruct Center Street, which included 1290 ft of road, 1275 ft of watermain, 440 ft of sanitary sewer, and 2000 ft of storm sewer. This project leveraged pass-through federal funds as well as more than \$2,000,000 in local match to completely reconstruct a main downtown street in South Haven. This project was an investment in the downtown that contributed to at least two major private redevelopment projects in the downtown since its completion. These projects added more than 15,000 sq ft of commercial, 40 dwelling units, and 80 parking spaces as well as continued to serve the downtown with safe, reliable infrastructure. In 2021, the City of South Haven was awarded \$427,724 in federal funds (\$292,941 Small Urban Funds, \$134,783 CMAQ) that was leveraged with \$114,376 in local funds to resurface Phoenix Street, a major thoroughfare into South Haven. This project resurfaced 2800 ft of roadway and built 1350 ft of bike path that didn't previously exist.

4.b.ii.(2) Compliance with Grant Requirements

The city complied with all the funding requirements, including an annual independent auditor's report on compliance for reach major federal project (aka "Single Audit") which is consistently found to have fulfilled with its compliance requirements. Evidence of compliance is on file with the various agencies that provided grant funds.

**THRESHOLD CRITERIA RESPONSE
CITY OF SOUTH HAVEN, MICHIGAN**

1. Applicant Eligibility –

a. The City of South Haven is a Michigan General Purpose Local Unit of Government and is eligible to receive funding through the U.S. EPA Brownfield Assessment Grant program.

b. N/A

2. Community Involvement – As the priority site projects advance, there will be ample opportunities to engage the community in regularly scheduled public meetings of the city, notably the Local Development Finance Authority and the City of South Haven Brownfield Redevelopment Authority (CoSHBRA). At the early stages of the EPA Grant, the CoSHBRA will convene several in-person community open houses. At these meetings, new information about the CoSHBRA's programs and available resources will be presented; feedback will be sought and a solicitation for any new sites will also be prepared. These open houses will allow target area residents to provide input on the issues, share concerns, and potential reuse strategies for the priority sites and other sites in their neighborhoods to be discussed. Additionally, the CoSHBRA will work with the Ward 1 Action Committee to obtain input on reuse strategies. CoSHBRA staff and/or our brownfield consultant will respond to this input, ensuring meaningful discourse and action. Efforts will be made to inform and notify residents and businesses in the target communities and citywide through our partners, mailings, or posting information on the city's social media, and at local retail/restaurant establishments, churches, community centers, and convenience stores. It will be critical to identify opportunities to interact with underserved community members in the city and target areas during times they can meet, which may not be during normal business hours due to their work schedules. We will also publicize programs, minutes, applications, and successes through the city website and our community-based project partners' websites. The CoSHBRA will utilize social media platforms including Facebook, LinkedIn, and Twitter, allowing broad community access and input. Factsheets, brochures, and performance dashboards will continue to be used and distributed.

3. Expenditure of Existing Grant Funds – The City of South Haven 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.