



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 18, 2020

VIA EMAIL AND U.S. MAIL

Ms. Brianna Knoppow
Office of Ground Water and Drinking Water
Office of Water
United States Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW (4606)
Washington, DC 20460

Dear Ms. Knoppow:

SUBJECT: Support for Benton Harbor's Application per Funding Opportunity
EPA-OW-OGWDW-19-01

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) enthusiastically supports the city of Benton Harbor's (City) application for \$14,842,995.30 in funding through the United States Environmental Protection Agency's (EPA) *Reduction in Lead Exposure Via Drinking Water* Funding Opportunity (Number: EPA-OW-OGWDW-19-01).

Like many other environment justice communities, the impacts of sustained population decline and economic disinvestment on the City, its residents, and its municipal finances have been severe. Over the past decade, the City has experienced a declared financial emergency, state receivership, and a 50 percent reduction in its City workforce.

In delivering safe drinking water to its 9,800 residents, the City faces many of the same structural challenges as better known Michigan cities like Flint and Detroit. As described in the City's application, it is operating a system built for a community approximately twice as populous as Benton Harbor is today—a community that once enjoyed a robust economy and manufacturing base that has long since left town.

The City's water distribution system is a century old. Much of its original infrastructure is still in use and well past its useful life. An estimated 98 percent of Benton Harbor's service lines are known, suspected to, or may contain lead. The system has consistently exceeded the Michigan action level since the fall of 2018 despite implementing corrosion control measures in conjunction with our department.

With a rate base characterized by households with a median income of just \$20,232 and residential housing that is almost 70 percent rental, there is a significant disparity between the community's financial resources and the needs of its water system.

In response to these realities, Benton Harbor is taking wise steps forward. The City has revamped its collection process and recently adopted annual water rate increases that will be levied in each of the next five years. It is working with EGLE on a Technical Managerial and Financial Capacity Study to address ongoing compliance challenges; making strides in inventorying its infrastructure and improving its recordkeeping; and seeking State of Michigan financial and technical support in a variety of other ways. Importantly, it has also engaged the community, working in coalition with local nonprofit organizations to educate residents about the financial, human health, and administrative aspects of its public water supply.

In the City, EGLE sees a partner community that is working to develop the necessary capacity to operate its water system independently, in a financially sustainable manner, and in compliance with Michigan's Lead and Copper Rule (promulgated pursuant to the Michigan Safe Drinking Water Act, 1976 PA 399, as amended) and other public health standards.

Funding to fully replace the City's lead service lines—and make the other smaller but critical investments included in their application—will not only represent a major step forward in protecting public health in this economically distressed community, but it will also contribute greatly to the financial stability of the City's water system as it works to catch up on needed upgrades to its aging infrastructure.

EGLE looks forward to continuing our collaboration with Benton Harbor to pursue those ends. In doing so, we will continue to leverage all the financial, technical, and regulatory tools at our disposal. EPA's awarding of the City's request will serve as a catalytic investment and advance the goals of your *Reduction in Lead Exposure Via Drinking Water* program in every respect.

If you have any questions or would like more information about EGLE's support for the city of Benton Harbor's application, please contact Ms. Amy Epkey, Senior Deputy Director, at EpkeyA@Michigan.gov or 517-242-7407.

Thank you for your time, attention, and the work you do to protect our environment and public health.

Sincerely,



Liesl Eichler Clark
Director
517-284-6712

cc: Ms. Kara Cook, Governor's Office
Mr. Aaron B. Keatley, Chief Deputy Director, EGLE
Ms. Amy Epkey, Senior Deputy Director, EGLE
Mr. James Clift, Deputy Director, EGLE
Ms. Ninah Sasy, Clean Water Public Advocate, EGLE
Ms. Sarah M. Howes, Legislative Liaison, EGLE