

To: Detroit Planning Commission

Re: Public Comment - **Proposal for Fugitive Dust paving of open-ground industrial yards**

Date: July 8, 2021

From: Simone Sagovac, resident and director of Southwest Detroit Community Benefits Coalition

Please accept the following Public Comment and proposal for future action.

Industrial businesses operating on unpaved ground and where their operations generate fugitive dust --by truck activity or other manipulations on the sites (cranes or other equipment), will be required to pave their sites to reduce fugitive dust, according either to impervious paving standards, or with drainage/ retention areas on site to reduce water runoff.

Example businesses, however **Not limited to: Scrap yards, junk yards, and shipping container yards or similar noxious dust generating uses**

Rationale:

Fugitive dust from unpaved industrial sites is as much or more of a generator of daily fugitive dust affecting residential neighbors and other sensitive receptors. This dust is particulate matter laden with various toxic substances that affect public health. Dust generated from these sites affects more than immediate neighbors as once particles are suspended in the air, they carry long distances and deposit in various places.

Fugitive dust is a problem that shifts responsibility from the generating source to the City to maintain streets, and to residents in the form of depreciation of property, inability to enjoy property, and significant impacts to quality of life and health. Residents can't open windows and experience increased asthma and other health conditions. Currently, some street sweeping, where occurring, is highly inadequate, briefly tamping down the dust only on the immediate street areas, only while the water stays wet. In summer heat especially, it dries quickly.

Other types of businesses and industries operate on property that is paved and while we don't want to urge more paving in general, we should not be exempting the very business activities where fugitive dust is a significant issue to public health. These types of open-ground businesses represent only a fraction of all industrial uses and like all of the rest should be required to address water drainage. There are plenty of examples of large paved sites like shopping centers, schools, rec centers, and other businesses with grass and tree areas within the paved areas for drainage.

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Another partial solution for unpaved yards is to include truck tire washing infrastructure to be used upon exit of facilities, and paving of entrances. While this could be a potential remedy for lighter activity sites, I didn't emphasize this method because it does not address continuous disturbance of the ground on sites from daily operations, and just rinsing truck tires upon exit would not address the problem of billowing and travelling dust.

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seeking a Bridge to A Healthy Community

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