



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Midwest Regional Office, Region V
Ralph Metcalfe Federal Building
77 West Jackson Blvd
Chicago, IL 60604-3507

OFFICE OF THE REGIONAL ADMINISTRATOR

September 22, 2021

Mary Ann Dolehanty
Air Quality Division
Michigan Department of Environment, Great Lakes and Energy (EGLE)
535 West Allegan Street
P.O. Box 30473
Lansing, Michigan 48909-7973
DolehantyM@michigan.gov

Dear Ms. Dolehanty:

Subject: Ajax Asphalt Plant, Flint, Michigan
Air Permit Comment Period

It has come to the attention of the Region V Office of the United States Department of Housing and Urban Development (HUD or the Department) that Ajax Materials Corporation has proposed to build an asphalt plant near two HUD-funded housing projects which are identified below.

- River Park is a 180-unit development that provides affordable housing to families and is owned and operated by the Flint Housing Commission. River Park receives public housing capital and operating funds from HUD. River Park is located at 7002 Pemberton Drive and is approximately 1,550 feet from the proposed plant location.
- Ridgecrest Village is a 163-unit property that provides affordable housing to families and receives funding from HUD's Office of Multifamily Housing. Ridgecrest Village is located at 1069 Ridgecrest Drive and is 0.5 miles away from the proposed plant location.

These projects provide affordable housing to at-risk families within the community of Flint, Michigan. The demographics of the projects are outlined in the chart below and clearly reflect the majority of the residents are low-income families of color in a community that is also majority-minority.

Property Demographics as of 9/14/2021	% Of people of color, including Black/African American, Hispanic/Latino and other	% Of low-income households	% Of disabled/elderly	# Of Children under 18 years of age
River Park (166 occupied units)	96%	100%	37%	359
Ridgecrest Village	100%	100%	11%	238

Entities that receive federal financial assistance from any source are subject to Title VI of the Civil Rights Act of 1964 which provides that “[n]o person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

The Department has serious concerns about the development of an asphalt plant near HUD assisted communities and the civil rights ramifications it may have under Title VI and other Federal, state, or local laws. Asphalt plants are known to produce toxic air pollutants, increase traffic pollution, increase noise pollution, increase the potential for chemical hazards, and increase environmental degradation. These factors have the potential to negatively affect the health, safety, and quality of living for the residents at River Park and Ridgcrest Village and the neighborhood in general.

The proposed Ajax asphalt plant will be in very close proximity to these properties, which may place a disproportionate share of negative environmental consequences on low-income families of color assisted by HUD. HUD takes very seriously any action that may create a discriminatory environmental effect on residents.

The Department is also concerned that the Michigan Department of Environment, Great Lakes and Energy (EGLE) did not include HUD in any discussions leading up to this call for public comment. HUD requests that EGLE include HUD in any future discussions of this or any other projects that have the potential to impact HUD residents.

The Department respectfully requests that EGLE take these serious environmental justice and civil rights concerns into consideration in its decision making.

Please contact the Detroit Field Office Director, Mike Polsinelli, at (313) 234-7502 or *via* email at Michael.L.Polsinelli@hud.gov and the Michigan Field Environmental Officer, Mary Weidel, at (313) 234-7370 or *via* email at Mary.T.Weidel@hud.gov for any future discussions regarding the proposed asphalt plant and other projects that may affect HUD assisted residents.

Sincerely,



James A. Cunningham
Deputy Regional Administrator
Region V – The Midwest