

ENVIRONMENTAL ASSESSMENT  
December 2020

EARLE C. CLEMENTS JOB CORPS CENTER  
PROPOSED DISPOSAL OF EXCESS  
PROPERTY  
MORGANFIELD, KENTUCKY

Prepared for:

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## **LIST OF ACRONYMS AND ABBREVIATIONS**

A-1	Limited Agricultural District
AADT	Average Annual Daily Traffic
ACHP	Advisory Council on Historic Preservation
ACM	Asbestos-Containing Materials
ACS	American Community Survey
APE	Area of Potential Effects
AST	Above Ground Storage Tank
BLS	Bureau of Labor Statistics
BTEX	Benzene, Toluene, Ethylbenzene, and Xylene
CDP	Census-Designated Place
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CO	Carbon monoxide
CSIP	Comprehensive School Improvement Plan
dB	Decibel
DERP	Defense Environmental Restoration Program
DoD	Department of Defense
DOL	U.S. Department of Labor
EA	Environmental Assessment
EO	Executive Order
ESC	Engineering Support Contractor
FE	Federally Endangered
FEMA	Federal Emergency Management Agency
FID	Flame Ionization Detector
FONSI	Finding of No Significant Impact
FS	Feasibility Study
ft	feet
FT	Federally Threatened
FUDS	Formally Used Defense Site
GHG	Greenhouse Gas

GSA	General Services Administration
GSF	Gross square feet
HUD	U.S. Department of Housing and Urban Development
HVAC	Heating, Ventilation, and Air Conditioning
I-1	Light Industrial District
IPAC	Information, Planning, and Conservation
IPCC	Intergovernmental Panel on Climate Change
ITE	Institute of Transportation Engineers
KDEP	Kentucky Department of Environmental Protection
KGS	Kentucky Geological Survey
kV	kiloVolt
KYCED	Kentucky Cabinet for Economic Development
KYEDC	Kentucky Economic Development Council
KYTC	Kentucky Transportation Cabinet
LBP	Lead-based Paint
MEC	Munitions and Explosives of Concern
MES	Morganfield Elementary School
MTC	Management and Training Corporation
NAAQS	National Ambient Air Quality Standards
NAHB	National Association of Home Builders
NCADAC	National Climate Assessment and Development Advisory Committee
NEPA	National Environmental Policy Act
NETR	Nationwide Environmental Title Research
NHPA	National Historic Preservation Act
NCO	Non-Commissioned Officer
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
pCi/L	picoCuries per liter (of air)
PA	Preliminary Assessment
PAHs	Polynuclear Aromatic Hydrocarbons
PBC	Public benefit conveyance

PCB	Polychlorinated Biphenyl
PM	Particulate Matter
POL	Petroleum, Oil, and Lubricant
POW	Prisoner of War
PVC	Polyvinyl Chloride
RCRA	Resource Conservation and Recovery Act
R-1	Low Density Residential District
RI	Remedial Investigation
SAT	Threatened due to similarity of appearance
sf	Square foot
SF	Standard Form
SFH	Single-Family Home
SHPO	State Historic Preservation Officer
SI	Site Inspection
SVOCs	Semi-Volatile Organic Compounds
UCMS	Union County Middle School
UCPS	Union County Public Schools
USACE	U.S. Army Corps of Engineers
USC	United States Code
USCB	U.S. Census Bureau
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UST	Underground Storage Tank
UXO	Unexploded Ordnance
V	Volt
VOCs	Volatile Organic Compounds
WACS	Women's Auxiliary Corps
WIOA	Workforce Innovation and Opportunity Act

## **1.0 EXECUTIVE SUMMARY**

The U.S. Department of Labor (DOL) administers the Job Corps, a national residential training and employment program, that helps young people improve the quality of their lives through vocational and academic training. In support of this mission, DOL oversees residential training campuses nationwide and is responsible for facilities and asset management at the Centers, to include construction as well as operations and maintenance. The DOL proposes to dispose of two parcels totaling 469.15 acres located southwest and east of the Earle C. Clements Job Corps Center in Morganfield, Kentucky through an excess property disposal process facilitated by the General Services Administration (GSA) for potential reuse.

As required under the National Environmental Policy Act (NEPA), and in accordance with DOL guidance, an environmental assessment (EA) must be prepared, detailing an evaluation of the impacts of the proposed action on the natural and built environment.

The 469.15-acre area is no longer needed to accomplish the DOL mission and has been determined excess to DOL need. Consequently, the primary purpose for the proposed action is the disposal of this excess property southwest and east of the Earle C. Clements Job Corps Center. The proposed project is needed to comply with requirements and procedures for federal real property disposal. When the government disposes of unneeded properties—through transfer, donation, or sale—it generates savings to that agency and the federal government by eliminating costs associated with maintaining the excess property.

The proposed action is the disposal of underutilized, excess property adjacent to the portion of the Earle C. Clements Job Corps Center to remain. Reuse of the excess property would occur as a secondary action under disposal over which the DOL has only minimal control through the property disposal process. In this EA one “no action” and one action alternative for disposal and potential reuse are considered for the proposed action.

Under the no action alternative (Alternative 1), DOL would not dispose of or otherwise transfer the Earle C. Clements Job Corps Center excess property. The DOL would continue to own and maintain the property which would be available for continued use or future projects for the Job Corps program, as needed.

Under the action alternative (Alternative 2), DOL would report a portion of the Earle C. Clements Job Corps Center to the GSA as “excess” property, granting GSA the authority to physically assess, appraise the property, and convey or negotiate the sale of the property. Although no specific entities have expressed interest in the property, based on current surrounding land uses, the most likely reuse would include a mixture of residential, agricultural, and industrial uses in different areas of the property. Upon acceptance, GSA would act as disposal agent, and under the hypothetical reuse evaluated in this EA, would oversee a public sale of the property, likely subdivided according to the

various proposed reuses. The 469.15-acre property would be transferred in “as-is condition” to the buyer(s).

Table 1 summarizes the evaluation of direct and indirect impacts to resources as a result of the no action and proposed action alternative. The evaluation performed for this EA indicates that no significant impacts are expected from any of the proposed action. In addition, no significant cumulative impacts are expected from the proposed action.

**Table 1. Summary of Impact Analysis for the Proposed Action and the No Action Alternatives**

<b>Impact Topic (Alphabetical)</b>	<b>No Action Alternative</b>	<b>Proposed Action Alternative</b>
<b>Air Quality</b>	No significant impact	No significant impact
<b>Biological and Physical Resources</b>		
Ecologically Critical Areas or Other Unique Natural Resources	Resource not present	Resource not present
Floodplains and Floodways	Resource not present	Resource not present
Prime and Unique Agricultural Land	Resource not present	Resource not present
Soils and Geology	No impact	No impact
Surface Water (Streams, Ponds, etc.) and Hydrology	No impact	Little to no measurable impact
Threatened and Endangered Species and Critical Habitats	No impact	No impact
Vegetation	No impact	No significant impact
Wetlands	No impact	No impact
Wildlife	No impact	Little to no measurable impact
<b>Cultural Resources</b>		
Archaeological Resources	Resource not present	Resource not present
Historic Buildings	No impact	No impact
Historic Properties of Religious or Cultural Significance to Native American Tribes	Resource not present	Resource not present
<b>Energy Requirements and Conservation Potential</b>	No impact	No impact
<b>Climate Change</b>	No significant impact	No significant impact
<b>Hazardous and Toxic Substances</b>	No impact	No significant impact
<b>Land Use</b>	No impact	No significant impact
<b>Noise</b>	No impact	Little to no measurable impact
<b>Socioeconomics</b>		
Economic Development	No impact	Beneficial impacts
Population Demographics	No impact	No significant impact

**Table 1. Summary of Impact Analysis for the Proposed Action and the No Action Alternatives**

<b>Impact Topic (Alphabetical)</b>	<b>No Action Alternative</b>	<b>Proposed Action Alternative</b>
Housing	No impact	Little to no measurable impact
Community Services	No impact	No significant impact
Environmental Justice	No impact	Little to no measurable impact
Protection of Children	No impact	No impact
Indian Trust Resources	Resource not present	Resource not present
<b>Transportation</b>	No impact	No significant impact
<b>Utilities</b>	No impact	No significant impact

## 1.1 CONCLUSIONS

Based on the analysis discussed in Section 5 of this EA, the proposed action alternative would have no significant adverse impacts on the existing natural or built environment. This EA supports a Finding of No Significant Impact (FONSI) for the proposed action. Accordingly, preparation of an Environmental Impact Statement is not required.

## **2.0 INTRODUCTION**

The Job Corps is a national residential training and employment program administered by the DOL. The Job Corps was created during the administration of President Lyndon B. Johnson in 1964 as part of Johnson's War on Poverty and Great Society initiatives that sought to expand economic and social opportunities for Americans, especially minorities and the poor. The Job Corps was modeled on the Depression-era Civilian Conservation Corps of the 1930s, which provided room, board, and employment to thousands of unemployed people. Job Corps was established originally by the Economic Opportunity Act of 1964. Authorization for the program continued under the Comprehensive Employment Training Act, then Title IV-B of the Job Training Partnership Act, and currently is provided for under Title I-C of the Workforce Innovation and Opportunity Act of 2014.

The Job Corps' mission for eligible young adults is to teach them skills they need to become employable, prepare them for careers, or further their education. The Job Corps addresses the multiple barriers to employment faced by disadvantaged youth throughout the United States.

In support of this mission, DOL oversees residential training campuses nationwide. The agency is responsible for facilities and asset management at the Centers, to include construction, operations and maintenance, as well as management of real property assets. The DOL proposes to dispose of two parcels totaling 469.15 acres located to the southwest and east of the portion of the Earle C. Clements Job Corps Center to remain, through a transfer facilitated by the U.S. General Services Administration (GSA) for potential reuse, for which an EA is required.

This EA was conducted in accordance with the NEPA of 1969 (42 United States Code [USC] 4321 et seq.), the Council on Environmental Quality (CEQ) regulations (40 Code of Federal Regulations [CFR] 1500 to 1508), and DOL NEPA Compliance Procedures, 29 CFR Part 11.

The purpose and need for the proposed action are defined in Section 3. A description of the project and overview of the alternatives is provided in Section 4. Section 5 describes the affected environment and consequences of the alternatives. Findings and conclusions are reported in Section 6.

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## **3.0 PURPOSE AND NEED FOR ACTION**

### **3.1 PROJECT LOCATION**

The Earle C. Clements Job Corps Center is located on 894.88 acres of rural land in Union County, in northwest Kentucky. The main entrance to the Center is located off U.S. Highway 60 with a mailing address of 2302 U.S. Highway 60 East, Morganfield, KY 42437. It is located approximately 1.9 miles east of Morganfield, Kentucky within the Breckinridge Center Census-Designated Place (CDP) (Figures 1 and 2). The project area is located at approximately 37°41' north latitude and 87° 52' west longitude. Elevation of the site is approximately 487 feet above mean sea level.

### **3.2 BACKGROUND**

The property was activated as the Breckinridge Job Corps Center in 1965, occupying a portion of the site that was originally developed in 1942 as Camp Breckinridge, a U.S. Army Cantonment camp, named for John C. Breckinridge, U.S. Vice President from 1856 to 1860. Following disposal of the Camp by the Army in 1963, a portion of the property was used to establish the Job Corps Center, which was later renamed after Earle C. Clements, the governor of Kentucky from 1947 to 1950 who was also a Morganfield resident. The property is federally-owned and managed by the DOL.

The active area of the campus where the majority of the buildings are located is 425.73 acres. The property has approximately 785,549 gross square feet (sf) in 79 buildings in addition to 31 structures and 9 pavilions. Several vacant or partially vacant buildings account for over 40,000 of the net sf on campus.

#### **3.2.1 Camp Breckinridge**

Plans for construction of Camp Breckinridge were begun in Washington, D.C., in August 1941 and about 36,000 acres of farmland were acquired by the federal government through condemnation proceedings (Heady 1987). The total cost of the land was over \$3 million acquired in fee (Heady 1987). Construction began in March 1942 and was essentially complete in five-and-one-half months at a cost of \$39,000,000. Camp Breckinridge was activated in September 1942 (Heady 1987; Weatherholt 2001). The first of the approximately 3,500 cream-colored frame buildings constructed included hospital facilities, barracks, mess halls, warehouses, and office buildings, to be followed by chapels, service clubs, theaters, recreation halls, and post exchanges. There were 24 post exchanges (general stores for soldiers), 10 non-denominational chapels, five theaters, three Service Clubs, three guesthouses and a field house or gymnasium large enough to enable the playing of three basketball games simultaneously. Of the three service clubs built, there was only one Non-Commissioned Officers (NCO) Club constructed. Like a large city, the Camp had a spacious hospital (132 buildings with maximum bed capacity of 2,635), bakery, laundry, incinerator, cold storage plant, motor repair shops, sewage disposal plant, five fire stations, all utilities, paved roads and sidewalks, and other facilities (Weatherholt 2001). This Army cantonment camp housed

40,000 people at its peak (Osborne 1996). Over 400 women in the Women’s Auxiliary Corps (WACs) were stationed at the Camp in 1943 (Heady 1987). The Camp also contained a prisoner-of-war (POW) camp for German soldiers from 1943 to 1946.

Camp Breckinridge was deactivated in February 1946, reactivated in 1949 but reopened for infantry training during the Korean War (1950-1953) (Heady 1987). It was deactivated in January 1954 (Heady 1987). From 1954 to 1963, the Kentucky National Guard used the Camp for summer training of 4,500 National Guard troops (Eastern Kentucky Military Historical Society, Inc. 2013). Disposal of Camp Breckinridge by the Army began in 1963 and about 853 acres were obtained to establish the Job Corps Center. Remaining acreage was acquired by private individuals, the City of Morganfield, and the State of Kentucky.

### **3.2.2 Earle C. Clements Job Corps Center**

The Breckinridge Job Corps Center was activated in 1965 on property obtained from the disposal of the former U.S Army Camp Breckinridge. The name was changed to the Earle C. Clements Job Corps Center in 1980. At present, the property is reported in Union County tax records as 953.5 acres in two parcels (Table 2; Schneider Geospatial 2020); however, the current facility planning report lists the acreage as approximately 964.1 acres (DOL 2017a). A property survey conducted in 2019 for the DOL identified discrepancies between the recorded and actual acreage of the property based on a review of the deeds and legal description of the property (Sprague Engineering and Surveying, LLC 2019). The survey identified that a parcel on the southwest edge of the Job Corps Center, totaling 69.23 acres (also reported as 67 acres), had previously been counted in the property total for the Center but is actually privately owned. The 2019 survey results will be recorded with the County, after which the public records will reflect the Earle C. Clements Job Corps Center property as three tracts totaling 894.88 acres (Table 3).

**Table 2. Earle C. Clements Job Corps Center Parcel Information (Union County records)**

<b>Parcel ID</b>	<b>Address</b>	<b>Legal Description</b>	<b>Parcel Acreage</b>	<b>Status/ Description</b>
76-21	Camp Breckinridge	Camp Breckinridge	853.495	Exempt Federal
77-29	Camp Breckinridge	Camp Breckinridge	100	Exempt Other
<b>Total</b>			<b>953.5</b>	

**Source:** Union County, KY Assessor’s Office (Schneider Geospatial 2020).

**Table 3. Earle C. Clements Job Corps Center Parcel Information (2019 property survey)**

<b>Tract Number</b>	<b>Address</b>	<b>Legal Description</b>	<b>Tract Acreage</b>	<b>Status/Description</b>
Tract 1	2302 U.S. Highway 60 East	Westerly boundary of Tract 3, detailed metes and bounds description	205.29	Excess property
Tract 2	2302 U.S. Highway 60 East	Easterly boundary of Tract 3, detailed metes and bounds description	263.86	Excess property
Tract 3	2302 U.S. Highway 60 East	Detailed metes and bounds description	425.73	To remain
<b>Total</b>			<b>894.88</b>	

Source: Sprague Engineering and Surveying, LLC 2019.

The active area of the campus is approximately 425.73 acres containing 78 buildings and 31 structures, including 9 pavilions (Figure 3). Since the property transfer to DOL, many of the remaining World War II buildings initially used to house Job Corps trainees were removed; however, about twenty-six (26) buildings and one (1) structure dating to 1942 remain on the Job Corps campus. More recent buildings and structures were constructed in the 1970s (n=14 buildings and 2 structures), 1980s (n=17 buildings and 14 structures), 1990s (n=7 buildings and no structures), and 2000s (n=14 buildings and 14 structures).

Two structures that were constructed by or for the Center include the small gatehouse (8ft x 10ft) (Building 2400) in the middle of Whitaker Way and a fountain at the intersection of Whitaker Way and N Village Square Rd; both of these are located outside the federally-owned Job Corps Center property boundaries. The fountain is located within the right-of-way on N Village Square Road.

The Earle C. Clements Job Corps Center is operated under contract with DOL by Management and Training Corporation (MTC) to provide residential living, academic education, recreation, and vocational training for a contract strength population of 1022, consisting of 672 men and 350 women. The Center provides career technical training in several vocational trades including the following:

- Advanced Automotive
- Advance Welding
- Automotive Diagnostic Tech
- Carpentry
- Collision Repair
- Culinary Arts
- Computer Service Technician
- Electrical
- Facilities Maintenance and Construction
- Heavy Equipment Mechanic
- Heavy Truck Driver
- Material Handler

- Medical Office Support
- Network Cable Installer
- Nursing Assistant/Home Health Care (Off-Center)
- Office Administration
- Plumbing
- Seaman (Inland River Systems - Deckhand)
- Tile Setting
- Welding

Each training program prepares students to earn an industry-recognized certification through a state agency or national accrediting body. As an accredited institution, the Job Corps Center also provides academic training, including basic reading and math, with the opportunity to earn a General Educational Development credential or high school diploma. Courses in independent living, employability skills, and social skills are offered to help students transition into the workplace.

All students must complete the application and recommendation process for his or her career training program as well as other Center requirements. All students must maintain satisfactory attendance and progress requirements.

### **3.2.2.1 Excess Property**

The proposed excess property encompasses two tracts of land totaling 469.15 acres located southwest and east of the portion of the Job Corps Center campus to remain (Table 3). The tract of land to the west, referred to as Tract 1, is approximately 205.29 acres. The land located to the east, identified as Tract 2, measures approximately 263.86 acres. The area of the Clements Job Corps Center to remain after transfer of the excess property is in the center, Tract 3, with an area of approximately 425.73 acres.

The two tracts to be disposed of by DOL are largely vacant with a mixed composition of woodland, shrubs, and grass-covered fields. The entire Job Corps Center was previously part of the World War II-era U.S. Army Camp Breckinridge. Most of the property was fully developed with hundreds of World War II temporary structures, most of which have since been removed. Several of the roads from the military installation remain but are severely deteriorated. One building associated with this period of occupation remains in Tract 1 (Building 1400)(Table 4). Two water towers in Tract 2, one of which also dates to World War II, are owned and maintained by the City of Morganfield (Girten 2019). A heavy equipment repair shop (Building 1000), constructed in 1989, is surrounded by a small equipment storage and staging yard with two (2) 1000-gallon diesel above ground storage tanks (AST). To the north of this area is a trash compactor and other utilitarian features added by the DOL for operation of the Center (Table 4). A linear concrete surface on the north side of Tract 2, the remnants of a World War II-era rail spur with access roads on three sides (Nationwide Environmental Title Research [NETR] 1951), is currently used for hazardous and other materials storage awaiting recycling/removal from the Center.

Areas of hazardous waste disposal (landfills) and ground water contamination have been identified on portions of the campus associated with the past use by the U.S. Army and

are actively monitored by the US Army Corps of Engineers (USACE). One landfill/onsite dump is actively used by maintenance staff for disposal of construction debris from small projects at the Center (e.g., from roof repair projects). These past uses may limit future reuse of these areas prior to preliminary assessments/site investigations, identification of hazardous materials, and remediation, as required. One area in the southeast corner of Tract 2 was actively being farmed (without authorization/easement from DOL) for row crops (corn) at the time of the site visit in 2019.

**Table 4. Building and Structures within the Two Tracts Proposed for Excess Property Disposal**

<b>Building/ Structure Number</b>	<b>Building (B) or Structure (S) (size)</b>	<b>Job Corps Center Name/Function</b>	<b>Date of Construction</b>
1400	B (2,450 sf)	Testing/Storage	1942
1000	B (3,600 sf)	Heavy Equipment Repair Shop	1989
N/A	60 ft. x 40 ft.	Trash Compactor	post 1965
N/A	1325ft. x125 ft.	Materials Storage/ Rail Spur	1942
N/A	150 ft. tall	Water Tower (Camp Breckinridge North Water Tower)	1942
N/A	150 ft. tall	Water Tower (modern)	ca. 2018

After reviewing an inventory of real property assets it owns, DOL determined that the two tracts totaling 469.15 acres, including buildings, structures, and other improvements, are excess to its needs to continue operation of the Earle C. Clements Job Corps Center. The area has been vacant and underutilized for several years due to the extensive distance of these areas from the main part of the campus, requiring students to walk long distances following pedestrian routes that crisscross vehicular roads. In addition to their distance from the main part of the campus, the high costs of repairing, maintaining, or repurposing deteriorated buildings and structures within the area has limited their use. Maintaining the landscaping of the unused acres is also expensive; the Center employs two full-time staff dedicated to maintaining the lawns using riding mowers.

Currently, Tracts 1 and 2 not used by the Center students and only have limited use by Center maintenance staff. Building 1400 was previously used for student Testing but by the 2019 site visit, the space was used only for storage. Noted deficiencies included the deteriorated building exterior, rear exit stair, and an unprotected fire alarm control panel. Building 1000 is actively used by Center maintenance staff for repair and storage of heavy equipment. The area around the building includes a small open yard for equipment storage and staging. Time clock controlled lighting surrounds Building 1000. The prefabricated metal-sided building envelope is not insulated, weatherized, or energy efficient. Other noted deficiencies include a deteriorated electrical panelboard, inadequate exit signage for egress paths, and deteriorated/old electrical receptacles (DOL 2017a).

Disposing of the excess property would reduce the costs of operating and maintaining this area of the Center and potentially generate revenue for DOL's Office of Job Corps to utilize in its asset management program.

The DOL plans to report the property as excess to the U.S. GSA through completion of Standard Form 118 (SF 118), Report of Excess Real Property. Upon acceptance of the property as excess, GSA would serve as disposal agent and follow procedures to determine an appropriate reuse of the property through transfer or sale.

### **3.3 PROJECT PURPOSE**

The 469.15-acre area located southwest and east of the Earle C. Clements Job Corps Center is no longer needed to accomplish the DOL mission and has been determined excess to DOL need. The extensive distances between facilities and the expense of maintaining many unused acres of lawn and deteriorated buildings are among the reasons the Earle C. Clements Job Corps Center is a challenge to manage. One of the primary goals of the Asset Management Plan for the DOL is to reduce the geographic size of real estate and lessen the cost of operating facilities.

Consequently, the primary purpose for the proposed action is the disposal of the two tracts totaling 469.15 acres. Reuse of the property by others is a secondary action over which the DOL has only minimal control through the property disposal process.

### **3.4 PROJECT NEED**

The proposed project is needed to comply with requirements and procedures for federal real property disposal. The federal government holds thousands of properties that agencies no longer need to accomplish their missions. When the government disposes of unneeded properties—through transfer, donation, or sale—it generates savings to that agency and the federal government by eliminating costs associated with maintaining excess property.

Although the Workforce Innovation and Opportunity Act (WIOA) assigns the Secretary of Labor the ability to acquire and dispose of real property, DOL has chosen to engage the GSA as the disposal agent for the transfer of the Earle C. Clements Job Corps Center excess property. DOL will submit a Standard Form 118 (SF 118), Report of Excess Real Property to GSA, along with other supporting documentation, and once accepted by GSA, GSA would take responsibility for any subsequent disposal-related activities. Any proceeds realized from the disposal would be retained by DOL in furtherance of the Job Corps program. DOL as the land-holding agency is required to complete NEPA review for its decision to dispose of the surplus property at the Earle C. Clements Job Corps Center and report it as excess to GSA. GSA will conduct their own NEPA analysis for the disposal and reuse, once known.

### **3.5 DESCRIPTION OF THE PROPOSED ACTION**

The proposed action is the disposal of excess property (469.15 acres and improvements) located southwest and east of the Earle C. Clements Job Corps Center. Reuse of the excess property would occur as a secondary action under disposal.

DOL will dispose of the property through a transfer facilitated by GSA. As a part of the disposal process, the GSA will first screen the property for reuse with other federal agencies. If there is no further need for the property within the federal government, the property is determined “surplus” and may be made available for other uses through public benefit conveyances (PBC), including homeless shelter use, negotiated sales, or public sales based on GSA’s determination of the property’s highest and best use. If a property is suitable for homeless shelter use, according to the Department of Housing and Urban Development (HUD), GSA must first consider transferring the property as a homeless shelter conveyance before any other public benefit conveyance can be considered. GSA can negotiate a sale at appraised fair market value with a state or local government if the property will be used for another public purpose. If state and local governments or other eligible non-profits do not wish to acquire the property, GSA can dispose of surplus property via a competitive sale to the public, generally through a sealed bid or auction.

Although formal screening has not yet occurred, a mixed reuse, including residential, agricultural, and industrial uses, may be likely for the property based on land uses of existing adjacent properties and identification of existing conditions on the excess property (e.g., landfills, agriculture). The portions of excess property Tracts 1 and 2, in addition to the property to remain (Tract 3), that are located within parcel 76-21 share the Exempt Federal designation of the parcel in accordance with Union County records (Table 2; Schneider Geospatial 2020). Tract 1 contains parcel 77-29 which is designated by the County as Exempt Other. Any future reuses would be zoned and developed in accordance with the Union County Zoning Ordinance (Union County 2019a).

For the purposes of analysis in the EA, under the secondary action, after disposal 50 acres of Tract 1 would be rezoned as a Low Density Residential District (R-1) for single-family homes (SFH). This reuse would result in approximately four (4) dwelling units per acre for a total of 200 new units. About 155.29 acres in Tract 1 would be zoned as an Agricultural District (A-1). About 160 acres comprising the northern portion of Tract 2 would be rezoned as a Light Industrial District (I-1) and about 103.86 acres in the central and southern portion of Tract 2 would be rezoned as agricultural (A-1). As noted above, GSA will conduct their own NEPA analysis for the disposal and reuse, once known.

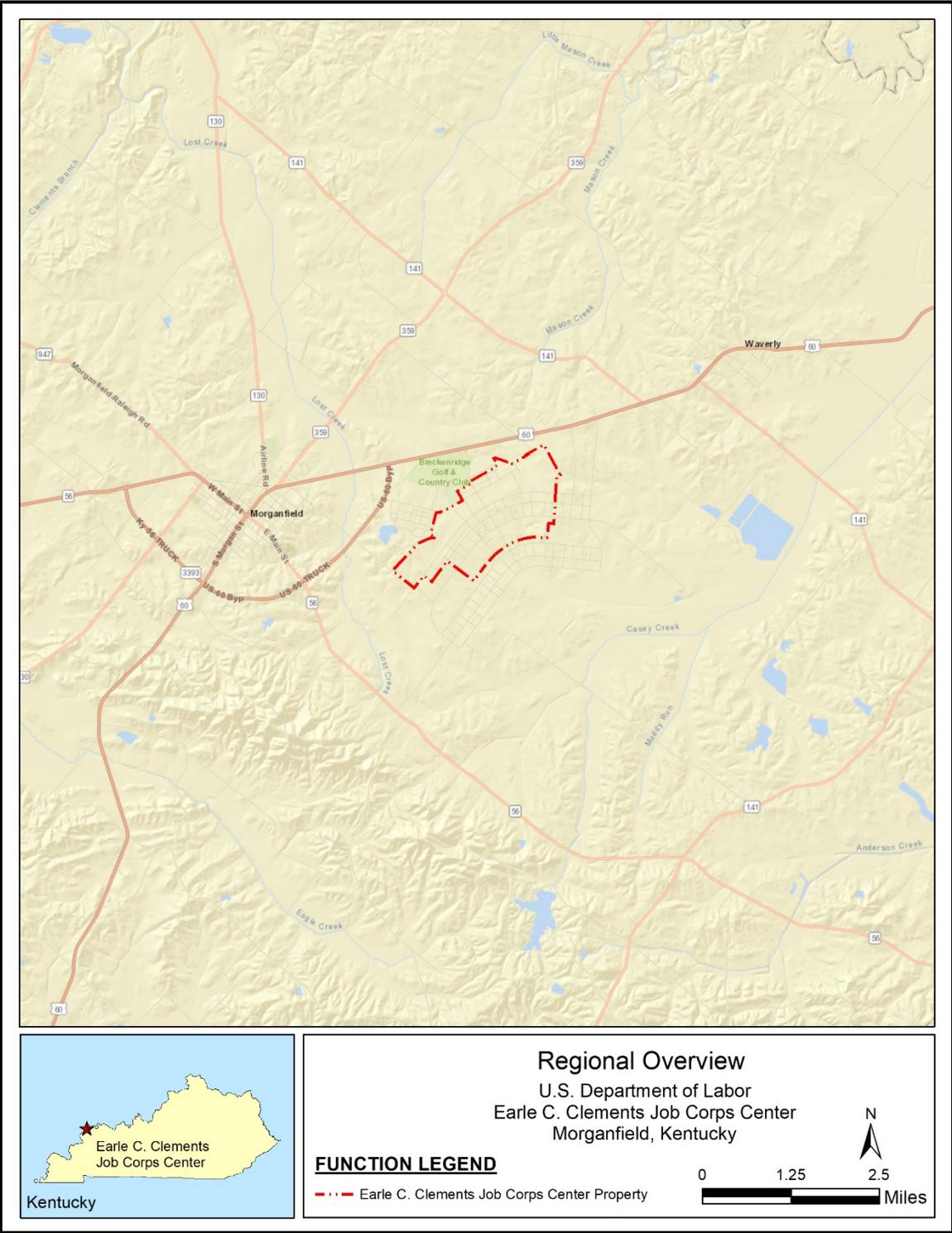


Figure 1. Regional Project Area

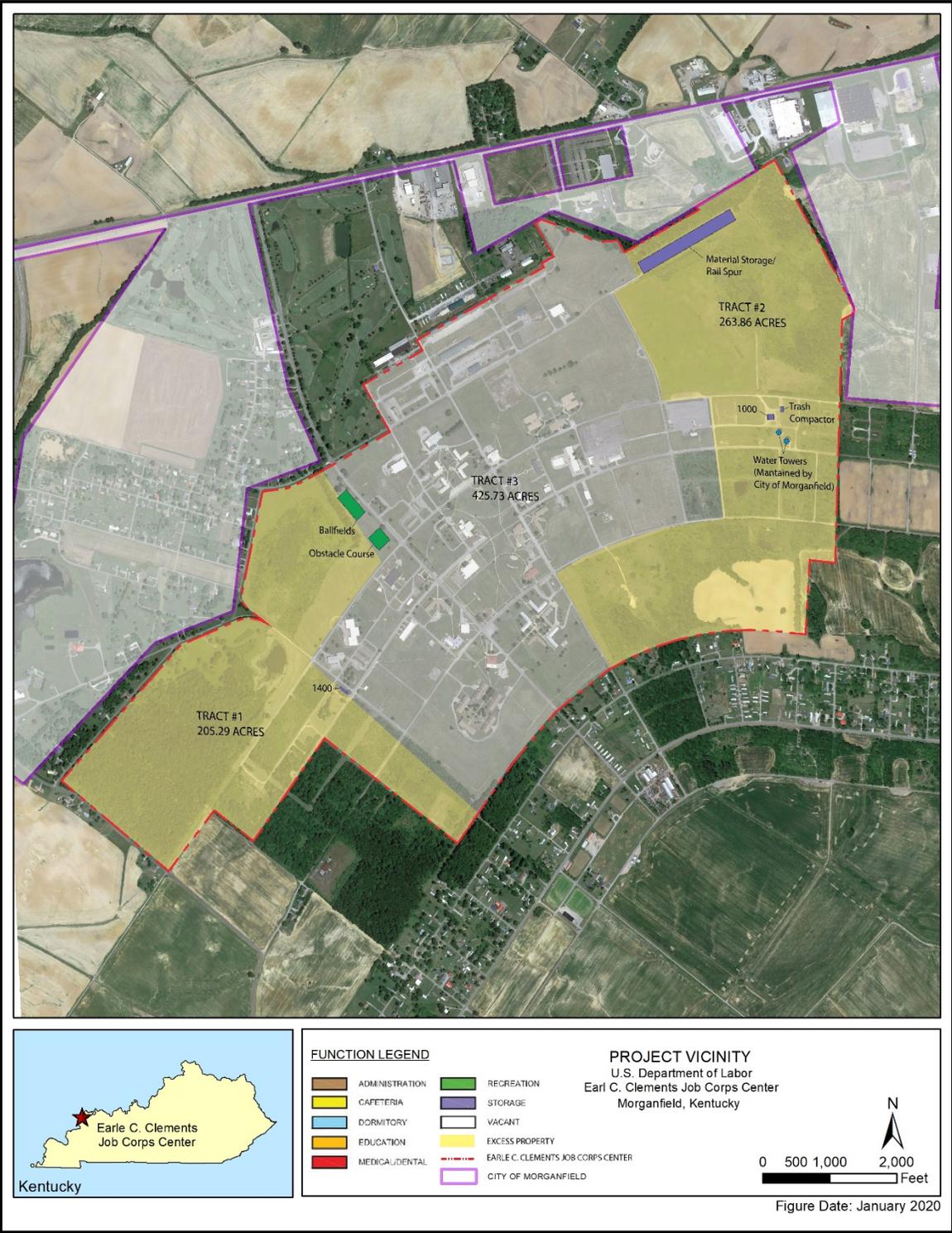


Figure 2. Project Area Vicinity

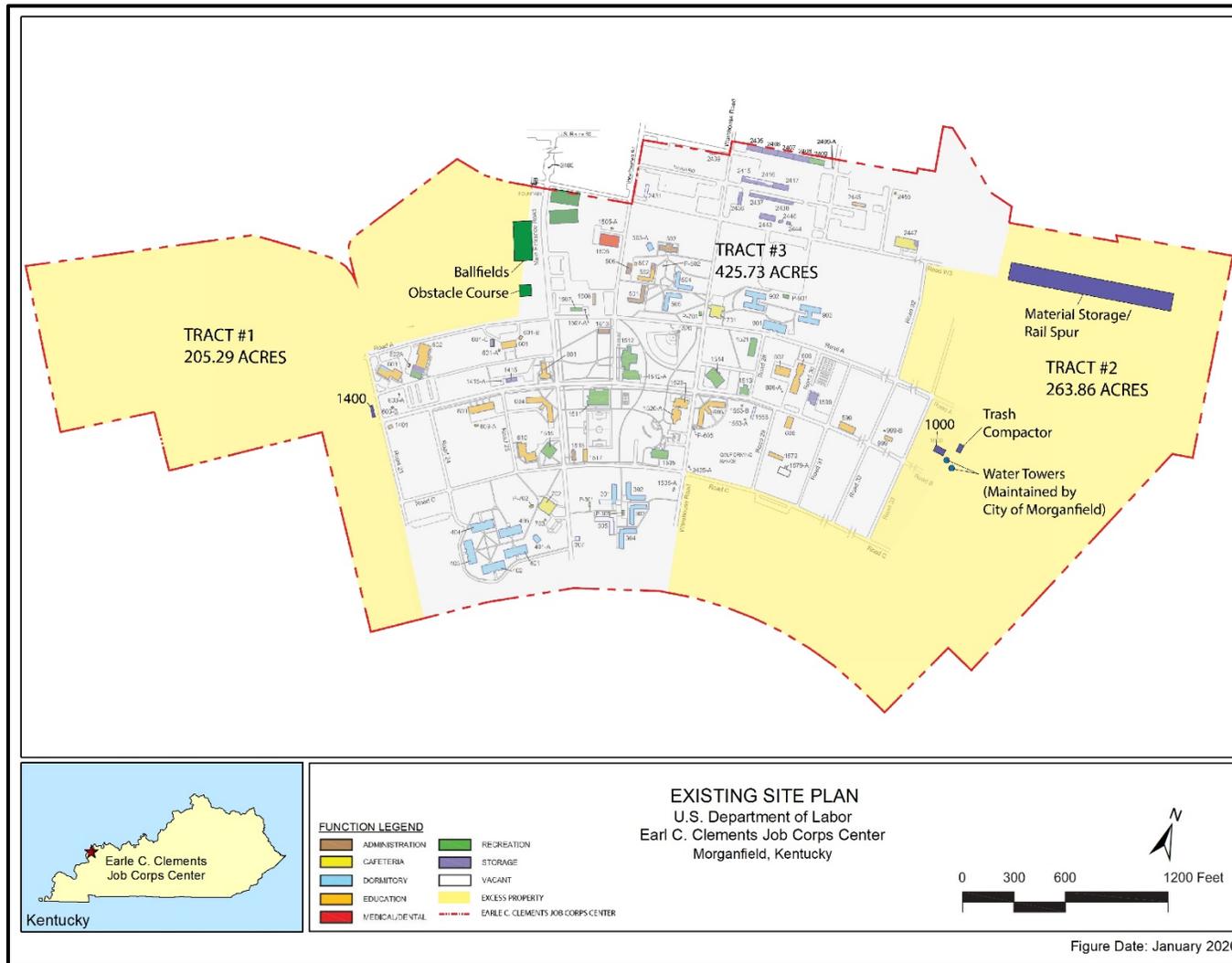


Figure 3. Earle C. Clements Job Corps Center Existing Site Plan (DOL 2017a)

## **4.0 ALTERNATIVES**

NEPA requires federal agencies to explore a range of reasonable alternatives and analyze effects that the alternatives could have on the natural and built environment. This section describes the “no action” alternatives, the proposed action, and alternatives considered but dismissed.

### **4.1 NO ACTION ALTERNATIVE**

Under the no action alternative (Alternative 1) DOL would not dispose of or otherwise transfer the tracts totaling 469.15 acres located southwest and east of the Earle C. Clements Job Corps Center. The area would continue to be federally owned as part of the Earle C. Clements Job Corps Center and the DOL through its contractor, would continue to manage these areas of the Center property. No demolition or new construction of buildings or structures would occur in this area. The existing layout of the Earle C. Clements Job Corps Center would remain similar to existing conditions. Buildings and structures in the area would continue to be used for storage and heavy equipment repair. The cost of owning and maintaining the acreage and improvements would remain DOL’s responsibility.

The Council on Environmental Quality (CEQ) regulations and 32 Code of Federal Regulations (CFR) Part 651 stipulate that the no action alternative be analyzed to assess any environmental consequences that might occur if the proposed action were not implemented and to provide a baseline against which the effects of the proposed action are compared. Therefore, the no action alternative was carried forward for detailed analysis in this EA. Baseline conditions under the no action alternatives will be described in Section 5 of this EA.

### **4.2 PROPOSED ACTION ALTERNATIVE**

The primary action evaluated is the DOL’s decision to dispose of excess property at the Earle C. Clements Job Corps Center. This is an action for which the DOL has responsibility, and both the authority and ability to control. The secondary action is reuse of the property after ownership is transferred, an action taken by others as a result of DOL’s decision to dispose of the property. Because reuse is a “secondary action” to the “primary action” of disposal and involves decisions ultimately made by others, DOL does not identify a preferred reuse alternative.

Methods available to DOL for property disposal include 1) a federal transfer facilitated by GSA, 2) a PBC in which state or local government entities may obtain the property at less than fair market value when sponsored by a federal agency (e.g., Department of Housing and Urban Development [HUD]) for uses that would benefit the public (e.g., homeless shelter), 3) negotiated sale in which GSA would negotiate the sale of the property to state or local government entities or private parties at fair market value, and 4) competitive sale in which sale to the public would occur through either an invitation

for bids or an auction. The reuse planning process is dynamic and often dependent on market, economic, and other conditions. The Earle C. Clements Job Corps Center would undergo a series of screenings by GSA to determine the most appropriate or most likely reuse alternatives.

Zoning restrictions can play a role in determining the type of redevelopment that can occur on a parcel and aid in the development of appropriate reuse alternatives. In the case of the Earle C. Clements Job Corps Center, both tracts comprising the excess property are officially regarded exempt properties by the County records (Schneider Geospatial 2020).

The following alternative evaluates a reasonable disposal and reuse scenario for the excess property at the Earle C. Clements Job Corps Center. Although the reuse alternative is hypothetical, it has been established to include a possible reuse of the property as a basis for evaluating potential impacts from the proposed disposal of the property by DOL.

Under the action alternative, DOL would report two tracts totaling 469.15 acres on the Earle C. Clements Job Corps Center to GSA as “excess” property through completion of Standard Form 118 (SF 118), Report of Excess Real Property, granting GSA the authority to physically assess, appraise, and convey or negotiate the sale of the property. Upon GSA’s acceptance of the Report of Excess Real Property, GSA would become disposal agent and would handle the disposal process. Based on location and existing surrounding land uses, a private buyer (or buyers) would be the most likely entity interested in acquiring the property for mixed use including residential, agricultural, and industrial. The parcels would be transferred in an “as-is condition” with each parcel being proposed as suitable for use for redevelopment in accordance with zoning restrictions in the County.

For this alternative, the analysis in the EA assumes any existing structures or foundations would be removed from the excess property and new residential buildings or industrial facilities would be constructed and agricultural fields would be cleared in accordance with current zoning and future land use recommendations in the County. The proposed action will evaluate a reuse in which 50 acres of Tract 1 would be rezoned as a Low Density Residential District (R-1) for single-family homes (SFH). Given the R-1 minimum lot requirement of 11,000 square feet, as many as 200 SFH would potentially be developed in this area. This development scenario will result in an average gross density, assuming an average of one dwelling unit per lot, of approximately 4 dwelling units per acre, falling under the County’s overall population density limit (per section 3.2 of the County zoning ordinance) of an average gross density of ten (10) dwelling units per acre (Union County 2019a). About 155.29 acres in Tract 1 would be zoned as agricultural (A-1).

For Tract 2, about 160 acres comprising the northern portion of Tract 2 would be rezoned as Light Industrial District (I-1) and about 103.86 acres in the central and southern portion of Tract 2 would be rezoned as agricultural (A-1).

### **4.3 ALTERNATIVES CONSIDERED BUT DISMISSED**

DOL considered disposing of a larger area of the Earle C. Clements Job Corps Center but dismissed this alternative to avoid loss of resources used by the Center and surrounding community (e.g., soccer fields shared with a local soccer league and the Job Corp's pre-military program obstacle course) or cutting off access to other areas around the campus (e.g., heavy truck operator training).

## **5.0 THE AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES**

This section provides a description of the existing environmental conditions of the geographic project area that could be affected by the proposed action or the no action alternative. Following each impact topic, a description of the potential environmental impacts that could result from implementation of the proposed action compared to the no action alternative is presented. The impact topics addressed are described below.

As part of this assessment, scoping letters describing the proposed action were submitted to various federal and state agencies to solicit comments regarding any possible impacts of the proposed action. Copies of the agency correspondence letters are presented in Appendix A.

Cumulative impacts of the proposed action, combined with impacts from past, current, and reasonably foreseeable future actions, are evaluated at the end of this section.

### **5.1 IMPACT ANALYSIS METHODS**

An environmental impact is defined as a change in a resource from the existing environmental baseline conditions caused by or resulting from one of the project alternatives. Impacts may be determined to be beneficial or adverse and may apply to the full range of natural, aesthetic, cultural, and economic resources of the property and its surrounding environment. The term “significant”, as defined in Section 1508.27 of the Regulations for Implementing NEPA (40 CFR 1500), requires consideration of both the context and intensity of the impact evaluated.

Significance can vary in relation to the context of the action. This means that the significance of an action must be analyzed in several contexts such as society (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend on the effects in the locale rather than in the world. Because of the nature of the proposed project, all impacts may be presumed to be localized unless stated otherwise.

In accordance with the CEQ implementing guidance, impacts are also evaluated in terms of their intensity or severity. Factors contributing to the evaluation of the intensity of an impact are listed in Section 1508.27 of the Regulations for Implementing NEPA.

The range of intensity of potential impacts discussed in this EA are characterized as follows:

- Significant impact - the impact is severe, major, and highly disruptive to current or desired conditions.
- No significant impact - the impact is slight, but detectable (minor) or the impact is readily apparent and appreciable (moderate).
- Little to no measurable impact - the impact is not measurable at the lowest level of detection (negligible);
- No impact - a resource is present, but is not affected;
- Resource not present.

## 5.2 IMPACT TOPICS ANALYZED

Five impact topics were assessed for potential impacts resulting from the proposed action. These topics include: cultural resources, hazardous and toxic substances, land use, socioeconomics, and transportation. Impact topics considered but not further assessed are described in Subsection 5.2.1. Table 5 lists each environmental resource category and subcategory and associated environmental impacts. As noted in the following analysis, none of the potential impacts identified in this EA are significant.

**Table 5. Summary of Impact Analysis for the Proposed Action and the No Action Alternatives**

<b>Impact Topic (Alphabetical)</b>	<b>No Action Alternative</b>	<b>Proposed Action Alternative</b>
<b>Air Quality</b>	No significant impact	No significant impact
<b>Biological and Physical Resources</b>		
Ecologically Critical Areas or Other Unique Natural Resources	Resource not present	Resource not present
Floodplains and Floodways	Resource not present	Resource not present
Prime and Unique Agricultural Land	Resource not present	Resource not present
Soils and Geology	No impact	No impact
Surface Water (Streams, Ponds, etc.) and Hydrology	No impact	Little to no measurable impact
Threatened and Endangered Species and Critical Habitats	No impact	No impact
Vegetation	No impact	No significant impact
Wetlands	No impact	No impact
Wildlife	No impact	Little to no measurable impact
<b>Cultural Resources</b>		
Archaeological Resources	Resource not present	Resource not present
Historic Buildings	No impact	No impact
Historic Properties of Religious or Cultural Significance to Native American Tribes	Resource not present	Resource not present
<b>Energy Requirements and Conservation Potential</b>	No impact	No impact
<b>Climate Change</b>	No significant impact	No significant impact
<b>Hazardous and Toxic Substances</b>	No impact	No significant impact
<b>Land Use</b>	No impact	No significant impact
<b>Noise</b>	No impact	Little to no measurable impact
<b>Socioeconomics</b>		
Economic Development	No impact	Beneficial impacts

<b>Impact Topic (Alphabetical)</b>	<b>No Action Alternative</b>	<b>Proposed Action Alternative</b>
Population Demographics	No impact	No significant impact
Housing	No impact	Little to no measurable impact
Community Services	No impact	No significant impact
Environmental Justice	No impact	Little to no measurable impact
Protection of Children	No impact	No impact
Indian Trust Resources	Resource not present	Resource not present
<b>Transportation</b>	No impact	No significant impact
<b>Utilities</b>	No impact	No significant impact

### 5.2.1 Impact Topics Dismissed

Resources that are either not present, or for which the alternatives would have little to no measurable effect, were dismissed from further consideration in this EA. The rationale for dismissal of these topics follows.

**Air Quality:** The Federal Clean Air Act (42 USC 7401-7671q) required the U.S. Environmental Protection Agency (USEPA) to establish a series of National Ambient Air Quality Standards (NAAQS) for air quality pollutant levels for six criteria pollutants. Current standards for these pollutants are available on the USEPA website (<https://www.epa.gov/criteria-air-pollutants/naaqs-table>). Areas where ambient concentrations of a given pollutant are below the applicable ambient standards are designated as being in “attainment” for that pollutant. An area that does not meet the NAAQS for a given pollutant is classified as a “non-attainment” area for that pollutant.

During construction on the excess property under the proposed action, there would be a moderate increase in air emissions. Emissions would be created from demolition, land clearing, new construction for residential dwelling and industrial facilities, excavation for underground utilities, paving concrete and asphalt surfaces, and landscaping. There would also be additional mobile emissions from commuting construction workers and construction equipment. Any impacts from these changes would be short-term and limited to the construction period. All applicable construction and operation permits would be obtained as required by the State of Kentucky.

During the reuse, there would be an increase in stationary source emissions from the operation of newly constructed residential dwellings and industrial facilities that would use units for heating, ventilation, and air conditioning (HVAC). There would be increased mobile source emissions from increased vehicular traffic from new building occupants.

Certain industrial uses can contribute to air emissions by emitting odor, carbon dioxide, and other pollutants into the air. Under the reuse, a portion of the property would be rezoned as light industrial. The Union County zoning code specifies that this “industrial district is intended primarily for production and assembly plants that are conducted so the noise, odor, dust and

glare of each operation are properly controlled” (Union County 2019a). Any additional county or state regulations concerning industrial emissions would also be met; therefore, any impacts would be negligible.

The reuse would result in approximately 160 acres of the property would be rezoned to Agricultural (A-1). There would be an increase in dust during seasonal farming activities. Agricultural use can contribute to particulate matter, odor, and precursor greenhouse gases. According to the Union County zoning code, livestock operations is a conditional use and is not anticipated to be a likely reuse at this parcel (Union County 2019a). The majority of the surrounding property zoned as A-1 is farming of corn and soybean, and the use of fertilizer, tilling or moving the soil, and tractors use would be the most likely sources of emissions. Use of EPA, Natural Resources Conservation Service (NRCS), and/or USEPA recommended practices such as conservation tillage or practices to promote soil health such as nutrient management, cover crops, and crop rotations that can reduce emissions (Wilson 2016). If these practices are implemented, impacts would be minimized. Any agricultural reuse would comply with any state or county regulations related to agricultural emissions or best management practices. The project area is located within Union County, Kentucky, which is designated as “in attainment” for all USEPA NAAQS criteria pollutants (USEPA 2020); therefore, it is not subject to 40 CFR, Part 93 Federal General Conformity Rule regulations. Because the county is in attainment for all NAAQS and the project would occur on a relatively small footprint, totaling 469.15 acres, within the much larger area of Union County, there would be no impact to the county’s status in regard to the NAAQS. Further, the project will comply with all county ordinances and state guidance and regulations concerning emissions and air quality; therefore, this topic was dismissed from further consideration.

**Ecologically Critical Areas:** The CEQ regulations (40 CFR 1508.27(b)(3)) require consideration of the severity of impact (intensity) on unique characteristics of the geographic area such as proximity to ecologically critical areas. The Earle C. Clements Job Corps Center is near a suburban area east of downtown Morganfield, Kentucky. It is surrounded by agriculture as well as commercial and residential areas. The main campus itself is developed with multiple buildings, roadways, and maintained grass covered lawns with limited tree cover. The tracts proposed as excess property consist of approximately 160 acres of tree cover and dense vegetation that may provide suitable habitat for wildlife including some threatened and endangered species. These areas were previously cleared for farming and maintained as part of Camp Breckinridge but allowed to revegetate as these areas are no longer used by the Center. No ecologically critical areas have been identified in or near the project area; however, any project activities under the proposed action would be coordinated with state and federal agencies to avoid any impacts to areas that might be identified as ecologically critical areas in the state; therefore, no further analysis is required.

**Floodplains and Floodways:** The project area is not located in a floodplain (Federal Emergency Management Agency [FEMA] Flood Insurance Rate Map, Flood Plain Panels: 21225C0170C, 21225C0200C) (FEMA 2009a, 2009b). This topic was dismissed because the resource is not present.

**Prime and Unique Agricultural Lands:** Prime farmland is one of the several kinds of important farmland defined by the U.S. Department of Agriculture (USDA). Prime farmland, as defined by the USDA, is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops and is available for these uses. It could be cultivated land, pastureland, forestland, or other land, but it is not urban or built-up land or water areas. The soil qualities, growing season, and moisture supply are those needed for the soil to economically produce sustained high yields of crops when proper management, including water management, and acceptable farming methods are applied. Based on the soil types identified in the project area and because the campus is located in a previously disturbed and developed area, the project area is not considered prime or unique agricultural lands. This resource is not present; consequently, there would be no impacts.

**Soils and Geology:** The proposed action alternative would have little to no measurable impact on the soil or geology at the project area because the soils present at the property were compacted and disturbed from previous leveling, grading, installation of underground utilities, and construction of roads, parking lots, and buildings during original construction of the facility. Any project activities under the proposed action alternative requiring excavation, backfilling, grading, or movement of heavy equipment within the project area would disturb the soil, increasing the potential for soil erosion by wind or runoff. However, impacts would be negligible because appropriate sediment control measures would be applied in accordance with local regulations to reduce and control erosion. Geological hazards such as sinkholes, caves, mines, or quarries are not known to exist on or adjacent to the project area (Kentucky Geological Survey [KGS] 2001, 2014). Soils and geology would not be appreciably affected by the proposed action alternative and are therefore not further assessed.

**Surface Water and Hydrology:** Per U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) mapping, riverine habitat is present in the Earle C. Clements Job Corps Center project area. Per NWI mapping the riverine features within the project area are intermittent tributaries of Higginson Ditch. Surface run-off is directed to drainage swales through the Job Corps Center (DOL 2017b). Three ponds are located within the two tracts proposed for excess property disposal. Tract 1 contains a large pond west of the intersection of Road A and 75<sup>th</sup> Infantry Road. Two smaller ponds occur within Tract 2: one located north of Road C and east of Road 33 and the second located southwest of the intersection of Road C and Road 34. These ponds were created between 1998 and 2004. Implementation of the no action alternative would result in no impacts because there would be no change to existing conditions. Since no instream construction is anticipated under the proposed action alternative, it is unlikely that direct impacts to streams would occur. If the proposed action is changed to include construction of any kind that would occur within any stream, the appropriate Clean Water Act permits would be obtained. In the occurrence of a stormwater event, there is a potential for indirect impacts to these streams through silt-laden stormwater runoff. During construction activities under the proposed action alternative, best management practices would be followed to ensure there is no erosion that enters surface waters, and storm drainage systems would be replaced along with the resurfacing of roads and lawns. Therefore, this project would have little to no measurable impact on surface waters. The proposed action alternative would not change the current or historical drainage patterns for the area. The proposed action alternative also would have little to no

measurable impact on hydrology because construction activities would not affect surface hydrology or occur deep enough to affect groundwater; therefore, no further analysis is required.

**Threatened and Endangered Species and Critical Habitats:** The USFWS Information, Planning, and Conservation (IPAC) System was reviewed to determine if any federally-listed endangered or threatened species may occur in the project area. According to IPAC, the federally-listed species identified in Table 6 are known or expected to be on or in the vicinity of the Earle C. Clements Job Corps Center (USFWS 2019).

**Table 6. Federally Listed Species near the Earle C. Clements Job Corps Center**

Common Name	Scientific Name	Status
Gray Bat	<i>Myotis grisescens</i>	FE
Indiana Bat	<i>Myotis sodalists</i>	FE
Northern Long-eared Bat	<i>Myotis septentrionalis</i>	FT
Least Tern	<i>Sterna antillarum</i>	FE
Source: USFWS 2019.		
Notes: FE = Federally endangered; FT = Federally threatened; SAT = Threatened due to similarity of appearance. Species listed as SAT are not biologically endangered or threatened and are not subject to Section 7 consultation.		

The species of birds identified in Table 7 are protected under the Migratory Bird Act (16 USC 703-712) and, according to IPAC, have the potential to occur in the project area (USFWS 2019). Bald and golden eagles are also protected under the Bald and Golden Eagle Protection Act (16 USC 668-668c).

**Table 7. Migratory Birds near the Earle C. Clements Job Corps Center**

Common Name	Scientific Name
Bald Eagle	<i>Haliaeetus leucocephalus</i>
Lesser Yellowlegs	<i>Tringa flavipes</i>
Red-headed Woodpecker	<i>Melanerpes erythrocephalus</i>
Rusty Blackbird	<i>Euphagus carolinus</i>
Semipalmated Sandpiper	<i>Calidris pusilla</i>
Source: USWFS 2019	

The proposed project area is not within any designated critical habitat. The developed project area includes limited tree cover and does not provide suitable habitat for wildlife; however, an approximately 70-acre undeveloped, forested area located south of Heriges Lane may provide suitable habitat for summer bat roosting. Under the proposed action alternative, anticipated impacts during redevelopment of the property include the physical disturbance of potential summer roosting habitats (i.e., living/dead trees, structures) for the Gray bat, Indiana bat, and northern long-eared bat. To mitigate environmental impacts during construction, best management practices to control impacts to the Indiana bat and northern long-eared bat would likely be implemented. Such best management practices may include observing timing restrictions for the removal of trees in the project area.

Any noise generated by construction under the proposed action alternative would not appreciably alter the overall ambient noise levels in the surrounding area. Although daytime construction

noise may temporarily displace individual species, this would not result in population level effects, as sufficient habitat is available within the vicinity of the site.

In a response dated August 11, 2020, the USFWS indicated no significant impact to federally-listed species would occur (Garland 2020) (Appendix A). Therefore, there would be little to no measurable impact on federally-listed threatened or endangered species or migratory birds as a result of the proposed action; therefore, no further analysis of this topic is required.

**Vegetation:** The project area includes an existing disturbed and developed area as well as a forested area (approximately 70 acres). The developed area includes a portion of the main campus of the Earle C. Clements Job Corp Center with buildings, asphalt or concrete paved surfaces, open recreational areas (i.e. soccer fields and outdoor equipment areas), and landscaped areas comprised of mown grass with limited areas of trees and shrubs that have been heavily influenced by human disturbance (clearing, draining, grading). Natural vegetation is present in the approximately 70-acre forested area located south of Heriges Lane (within Tract 1). Areas of landscaped and natural vegetation may be disturbed by construction activities under the proposed action; however, new areas of landscape vegetation may be installed as part of residential or light industrial reuse of the area. Therefore, there would no significant impacts to vegetation and this topic does not require further analysis.

**Wetlands:** Wetlands are areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and in normal conditions do support, a prevalence of vegetation adapted for life in saturated soil conditions. The USFWS NWI is a publicly available resource that provides detailed information on the abundance, characteristics, and distribution of United States wetlands. USFWS NWI maps were reviewed for the potential occurrence of wetlands at the Earle C. Clements Job Corps Center. Per USFWS NWI mapping, riverine habitat is present within the Earle C. Clements Job Corps Center property. These riverine features are intermittent tributaries of Higginson Ditch. Although there is riverine habitat within the project area, the project area does not contain any designated wetlands (USFWS 2019). Therefore, no impacts to wetland resources would be expected to occur as a result of the proposed action, and this topic is not further assessed.

**Wildlife:** The project area includes a developed area with limited tree cover and landscape vegetation that does not provide suitable habitat for wildlife. An approximately 70-acre forested area, located south of Heriges Lane (within Tract 1), may provide suitable habitat for terrestrial species including white-tailed deer (*Odocoileus virginianus*), wild turkeys (*Meleagris gallopavo*), raccoon (*Procyon lotor*), and eastern cottontail (*Sylvilagus floridanus*). Terrestrial species may be displaced from the project area during daytime construction activities or if the area is redeveloped under the proposed action. Species may retreat to lightly-forested areas north of the project area. The proposed action alternative would have little to no measurable environmental effects on wildlife; therefore, no further analysis of this topic is required.

**Energy Requirements and Conservation Potential:** Executive Order (EO) 13834 requires federal agencies to efficiently operate federal facilities. The EO addresses requirements for federal facilities in energy, environmental water, fleet, buildings, and acquisition management. The no action alternative would adhere to guidance provided in EO 13834 per DOL policy. Any impacts would be beneficial. Any impacts would be beneficial. The EO would not apply to the

proposed action alternative since the property would be transferred or sold out of federal ownership. Therefore, this topic was not carried forward for analysis.

**Climate Change:** Climate change refers to any significant changes in average climatic conditions (such as mean temperature, precipitation, or wind) or variability (such as seasonality and storm frequency) lasting for an extended period (decades or longer). A report by the National Climate Assessment and Development Advisory Committee (NCADAC) U.S. Climate Change Science Program and Intergovernmental Panel on Climate Change (IPCC) provides evidence that climate change is occurring as a result of human activity and associated rising greenhouse gas (GHG) emissions, and that it could accelerate in coming decades (NCADAC 2013). While climate change is a global phenomenon, it manifests differently depending on regional and local factors. General changes that are expected in the future as a result of climate change include hotter, drier summers; warmer winters; warmer water; higher ocean levels; more severe wildfires; degraded air quality; more frequent heavy downpours; and increased drought.

By statutes, EOs, and agency policies, the federal government is committed to addressing climate change through energy conservation, reducing energy use, eliminating or reducing GHG emissions, and promoting the deployment of renewable energy technologies that are cleaner and more efficient. Where a proposal for a federal agency action implicates these goals, information on GHG emissions (qualitative or quantitative) that is useful and relevant to the decision should be used when deciding among alternatives.

The no action alternatives would involve no release of GHG and would have no impact. The proposed action alternative would include the use of heavy equipment, typical of demolition/construction projects. Once construction of a new residential neighborhood is complete, the neighborhood would generate levels of GHG emissions characteristic of other residential neighborhoods in the area. Portions of the area would also be rezoned as industrial and agricultural. As mentioned above in air quality, these activities can increase nitrogen emissions from use of fertilizer as well as emissions of precursor ozone emissions and carbon dioxide. All activities would comply with local zoning and county and state regulations; therefore, the alternatives would not result in any significant impacts to regional climate change.

**Noise:** The Earle C. Clements Job Corps project area, Tract 1, is flanked by Kentucky Highway 2091 to the west, Heriges Lane to the north, Center athletic fields along Main Entrance Road to the east, and privately-owned parcels along Meadows Road to the south.

The Tract 2 area is bounded by the portion of the Center to remain (Tract 3) to the west, an unnamed roadway connected to Flourney Rd to the north, several city-owned and privately-owned properties to the east, and private property along Meadows Road to the south. Agricultural land containing corn and soybean crops are present between Road C and Meadows Road.

For the no action alternative, there would be no change in noise from existing conditions on the excess property at the Earle C. Clements Job Corps Center property because there would be no change in existing use. The existing noise sources include occasional maintenance personnel, vehicles, and small gasoline powered motors such as leaf blowers, lawn mowers, and trimmers.

No site preparation or construction activities are anticipated under this alternative, so there would be no impact to noise from these activities.

Under the proposed action alternative, equipment used in demolition, site preparation, and construction could at times generate noise above ambient levels. Estimated noise levels for heavy construction equipment range from 75 to 105 decibels (dB) at 50 feet from the source and the sound intensity generally decreases 6 dB with each doubling of the distance from the source (USEPA 1971). Construction activities would be conducted during daylight hours and would be at a sufficient distance from nearby receptors so as to result in no impact. Impacts to noise would temporarily increase during demolition and construction for the proposed redevelopment but would be expected to decrease once construction is complete.

During operation and use of the new buildings (residential and industrial) in the redeveloped project area under the proposed action alternative, there would be a minor increase in vehicular traffic to and from the project area that may generate noise above ambient levels. The increased vehicular traffic could impact residents in the new housing area located in Tract 1, and employees of the new industrial facilities located in Tract 2. Because vehicular traffic noise is common sounds in this setting, and any additional vehicular sounds would not significantly change the existing noise environment. The Union County Zoning also specifies that development including agriculture, industrial, and residential must be free from objectionable noise (Union County 2019a); therefore, there would be little to no measurable impact to noise from the proposed action alternative.

**Indian Trust Resources:** Indian trust assets are legal interest in property held in trust by the United States for Native American tribes or individual Native Americans. Management of Indian trust assets are based on the requirements included in the Secretary of the Interior's Secretarial Order No. 3206, "American Indian Tribal Rites, Federal – Tribal Trust Responsibilities, and the Endangered Species Act," and Secretarial Order No. 3175, "Departmental Responsibilities for Indian Trust Resources." Indian trust assets do not occur within the project area; therefore, this impact topic was not further assessed.

**Utilities:** Current utilities located at the Job Corps Center include electrical service, natural gas, and municipal water and sewer.

*Electric.* Electrical service is provided by the Kentucky Utility Company through an overhead master-metered primary 12.7 kV electrical distribution system. Overhead services from pole-mounted transformer banks are provided for the majority of the buildings throughout the Center. Older buildings secondary electrical services are 120/240V, 3-phase, 4 wire. Newer buildings secondary electrical services are 120/208V, 3-phase, 4 wire services. Union Trades Building 601 and 300 series dorms are provided with additional 277/480V service. Wall and pole-mounted site lighting are controlled mostly by photocell, with exception of sport field lighting and Buildings 601, 603, 610, 1000, 1505, 1515, 1526, 2431 and 2447 which are controlled by time clock. Site lighting is owned and maintained by the center (DOL 2017a).

*Backup Power.* Dining facility buildings 701 and 702, the 900 series dorms, Medical/Dental Building 1505, The Mock-up Barge (near Building 1579), and Cold/Dry Storage Building 2447, are backed up by natural gas generators (DOL 2017a).

*Natural Gas.* Natural gas is supplied by Morganfield Gas Company that owns and maintains a high pressure gas regulator system and meter-meter system located at the front entrance gate. Natural gas is distributed underground to gas regulators located at various buildings. This system of piping is owned and maintained by the Earle C. Clements Job Corps Center.

*Water and Sewer.* The City of Morganfield provides water and sanitary sewer service to the Earle C. Clements Job Corps Center campus. A multiple master-metered water service for the domestic water system and fire hydrant system is owned, maintained, and operated by the City. Ownership of the distribution piping system was transferred to the City, which is now responsible for the distribution system maintenance. The distribution system is in fair condition with an adequate number of fire hydrants. The distribution system dates to the 1950s and is leaking site wide. This may likely account for the high water use at the Center. The Center water use in gallons per Gross Square Foot (GSF) is nearly twice the Job Corps median, including the excess of underutilized building areas.

There would be no impact to utilities from the no action alternative as there would be no change in baseline conditions at the Earle C. Clements Job Corps Center. Because the utilities services available in the area have the capacity to expand to provide service for any new development in the project area under the proposed action alternative, any change in demand and usage would not be significant and this topic was not carried forward for analysis.

### **5.2.2 Impact Topics Retained for Detailed Analysis**

Impact topics retained for further analysis focus on evaluating the potential consequences of the proposed action and alternatives. Impact topics are identified based on legislative requirements. Impact topics related to the proposed action at the Earle C. Clements Job Corps Center considered in this analysis are:

- Cultural Resources
- Hazardous and Toxic Substances
- Land Use
- Socioeconomic Considerations (except for Indian Trust Resources); and
- Transportation

### **5.3 HISTORIC, ARCHITECTURAL, ARCHAEOLOGICAL, & CULTURAL RESOURCES**

This section describes the existing historic, architectural, archaeological, and cultural resources, as well as potential impacts that could result from no action or implementation of the proposed action alternative. Cultural resources are prehistoric and historic sites, structures, districts, artifacts, or any other physical evidence of human activity considered important to a culture, subculture, or community for traditional, religious, scientific, or any other reason. Cultural resources are discussed in terms of archaeological resources, including both prehistoric and historical occupations, architectural resources (historic buildings), and properties of religious or cultural significance to Native American Tribes, including Traditional Cultural Properties. Historic properties, as defined by the National Historic Preservation Act (NHPA), represent the

subset of cultural resources listed on, or eligible for, inclusion in the National Register of Historic Places (NRHP).

The DOL-sponsored proposed action involves federal assistance and federal permitting, licensing, or approval (36 CFR 800.16(y)). As a result, the proposed action is under the purview of Section 106 of the NHPA. Section 106 of the NHPA governs federal actions that could affect NRHP-eligible resources (*i.e.*, historic properties). Section 106 requires federal agencies to take into account the effects of their undertakings on NRHP-eligible resources and to afford the Advisory Council on Historic Preservation (ACHP) and other interested parties a reasonable opportunity to comment.

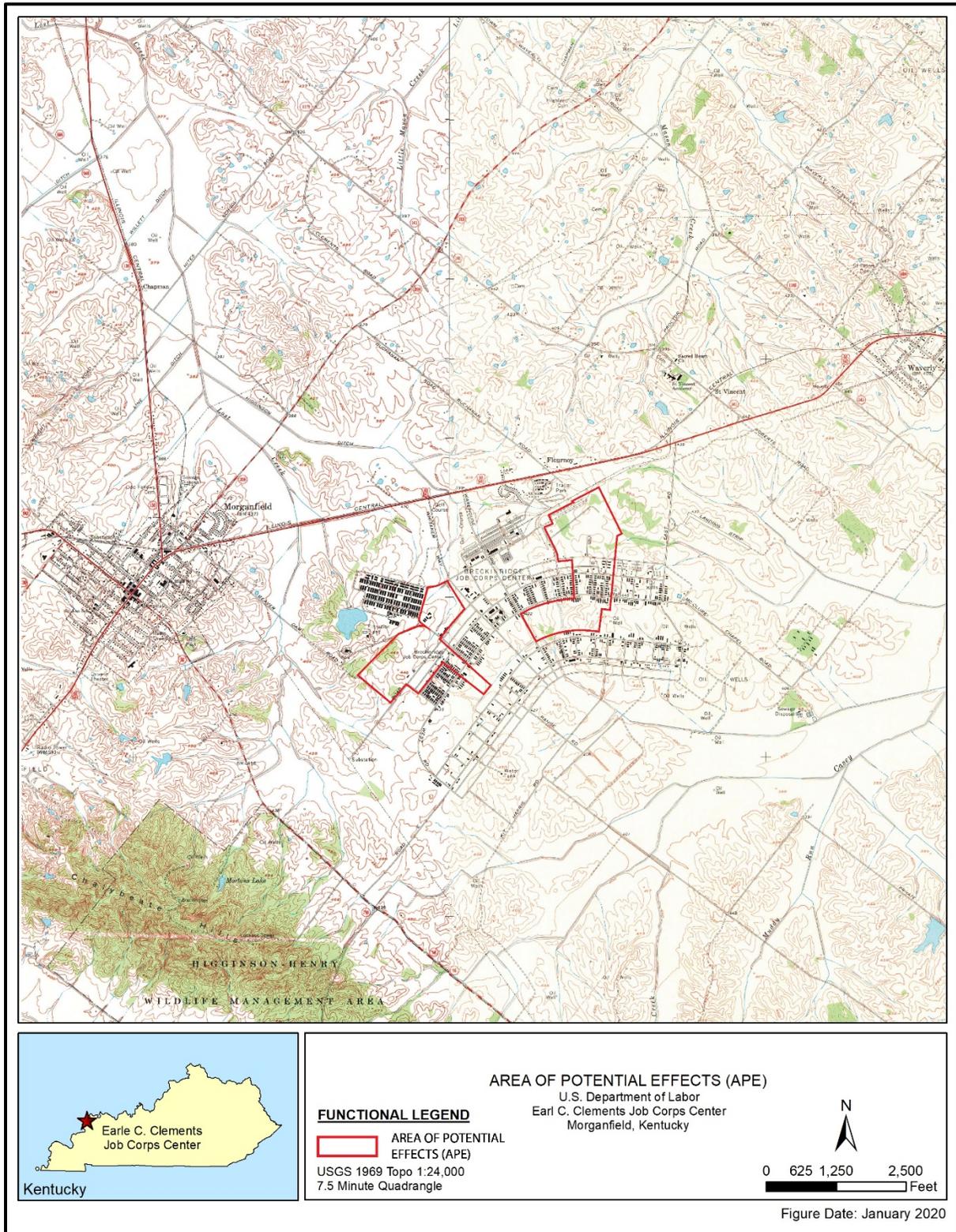
Identification of NRHP-eligible resources, including archaeological sites, architectural resources, and Native American resources, was conducted according to requirements of 36 CFR 800 for Section 106 of the NHPA. The Section 106 process was initiated with the Kentucky Heritage Council, which contains the State Historic Preservation Office (SHPO), on August 6, 2020 (Appendix A). The Area of Potential Effects (APE) was established in coordination with that office. In a letter dated September 3, 2020, the Kentucky Heritage Council concurred with a finding of No Historic Properties Affected (Potts 2020).

### **5.3.1 Affected Environment**

To identify cultural resources that could be potentially affected by the proposed action, the area within which archaeological, architectural, and Native American resources would have the potential to be affected must be determined. As defined by 36 CFR 800.16(d) of Section 106 of the NHPA, the APE represents the "...geographic area or areas within which an undertaking could cause changes in the character or use of historic properties, if any such exists". In delineating the APE, factors taken into account include the elements of the proposed action, the existence of buildings, vegetation, and terrain with respect to potential visual or audible impacts, and construction activities necessary for the proposed action.

The APE for cultural resources for the proposed action at the Earle C. Clements Job Corps Center consists of the two parcels totaling 469.15 acres (Figure 4).

Archival research included a review of listings on the NRHP, assessment of historic cartographic records and a general literature search. An architectural resources survey was conducted in 2013 to document all remaining 1942 buildings located on the campus of the Earle C. Clements Job Corps Center and assess their eligibility for listing on the NRHP (Scherer 2013). Of the thirty (30) buildings evaluated, only one building, the Fieldhouse (Building 1511), was determined to be NRHP-eligible (Scherer 2013).



**Figure 4. Area of Potential Effects (APE)**

### **5.3.1.1 Archaeological Resources**

No previously identified archaeological sites occur in the APE. The APE was extensively disturbed from prior development of this portion of the Camp Breckinridge in 1942 as an Army cantonment. Prior to that time, the area was used for agriculture. Development during World War II included grading and leveling for construction of buildings, roadways, sidewalks, and parking areas, and excavation for utilities and deep drainage ditches edging the roadways.

Subsequent disturbance consisted of demolition of Camp Breckinridge buildings, operation of a landfill, and agricultural uses. No intact archaeological resources are likely to occur within the Earle C. Clements Job Corp Center campus.

### **5.3.1.2 Architectural Resources**

Tract 1 is 205.29 acres and contains one 1942 Camp Breckinridge building (Building 1400). More than 137 buildings associated with the US Army Cantonment Camp Breckinridge (1942-1953) were constructed within this parcel but all, with the exception of Building 1400, were demolished by 1998.

Tract 2 is 263.86 acres and contains the remnants of a rail spur with access roads on three sides (NETR 1951), two water towers, and one heavy equipment repair shop (Building 1000) constructed in 1989. More than 110 buildings associated with US Army Camp Breckinridge were constructed within this parcel but all, except the water tower, were demolished by 1998.

In 2013, a historic building survey was conducted to assess the NRHP eligibility of thirty World War II buildings and structures at the Earle C. Clements Job Corps Center (Scherer 2013). Twenty-nine of the thirty buildings and structures were determined to lack historical and architectural significance and were recommended as not eligible for listing in the NRHP. Only Building 1511, the fieldhouse, was considered NRHP eligible for its unique architecture (Scherer 2013). The SHPO concurred with the determinations of eligibility on July 26, 2013 (Potts 2013). Building 1400, a former guardhouse (Plexus Scientific Corporation 2008: Appendix D), and the 1942 Water Tower are located within the two parcels designated as excess property. Both resources were determined not eligible (Scherer 2013) with the SHPO concurrence (Potts 2013).

### **5.3.1.3 Properties of Religious or Cultural Significance to Native American Tribes**

Native American Tribes with a potential interest in the project area based on location or historical ties to the area were identified. The DOL initiated consultation with the Eastern Band of the Cherokee Indians, the Shawnee Tribe, and the Chickasaw Nation in letters dated August 6, 2020 (Appendix A). Based on a preliminary review, no properties of religious or cultural significance to Native American tribes are known to occur within the proposed project area.

## **5.3.2 Environmental Consequences**

In this EA, impacts to cultural resources are described in terms of type, context, duration, and intensity, which is consistent with CEQ regulations that implement NEPA. These impact analyses are intended, however, to comply with the requirements of both NEPA and Section 106 of the NHPA. In accordance with the ACHP regulations implementing Section 106 (36 CFR Part

800, Protection of Historic Properties), impacts to cultural resources were identified and evaluated by: (1) determining the APE; (2) identifying cultural resources present in the APE that are either listed in or eligible to be listed in the NRHP; (3) applying the criteria of adverse effect to affected cultural resources either listed in or eligible to be listed in the NRHP; and (4) considering ways to avoid, minimize, or mitigate adverse effects.

Under the ACHP's regulations, a determination of either adverse effect or no adverse effect must be made for affected NRHP-listed or eligible cultural resources. An adverse effect occurs whenever an impact alters, directly or indirectly, any characteristic of a cultural resource that qualifies it for inclusion in the NRHP (e.g., diminishing the integrity of the resource's location, design, setting, materials, workmanship, feeling, or association). Adverse effects also include reasonably foreseeable effects caused by the build alternative that would occur later in time, be farther removed in distance, or be cumulative (36 CFR 800.5, Assessment of Adverse Effects). Adverse effects on historic properties would include, but not be limited to:

1. Physical destruction, damage, or alteration of all or part of the property;
2. Isolation of the property from or alteration of the character of the property's setting when that character contributes to the property's qualification for the NRHP;
3. Introduction of visual, audible, or atmospheric elements that are out of character with the property or alter its setting;
4. Neglect of a property resulting in its deterioration or destruction; and
5. Transfer, lease, or sale of the property (36 CFR 800.9[b]).

A determination of no adverse effect means that historic properties are present, but the effect would not diminish in any way the characteristics of the cultural resource that qualify it for inclusion in the NRHP.

For the purposes of this EA, a significant impact under NEPA is defined as an "unresolvable" adverse effect under Section 106 of the NHPA. "Unresolvable" adverse effects may occur when the terms of mitigation cannot be agreed upon, or if the NHPA Section 106 process is foreclosed due to an inability to reach agreement.

### **5.3.2.1 No Action Alternative**

Under the no action alternative, the property proposed for disposal would continue to be owned and managed by the DOL as part of the Earle C. Clements Job Corps Center. No changes to existing conditions from ground disturbance for demolition, renovation, or other construction within the excess property would occur. Because it is unlikely that any previously unidentified NRHP-eligible archaeological sites occur due to extensive prior ground disturbance and no NRHP-eligible architectural resources or Native American resources are present on the campus, there would be no impacts to cultural resources from the no action alternative.

### **5.3.2.2 Proposed Action Alternative**

Under the proposed action alternative, no impacts to archaeological resources are expected since there is limited potential for NRHP-eligible archaeological resources to occur within the previously developed and disturbed APE. No historic architectural resources and no Native American resources occur in the APE. The potential reuse of the property after disposal would result in no impacts to cultural resources.

## **5.4 HAZARDOUS AND TOXIC SUBSTANCES**

### **5.4.1 Affected Environment**

The terms hazardous waste, hazardous materials, and toxic substances include those substances defined as hazardous by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA) and the Toxic Substances Control Act. In general, they include substances that, because of their quantity, concentration, or physical, chemical, or toxic characteristics, may present a moderate danger to public health or welfare or the environment upon being released.

The site was originally constructed as part of Camp Breckinridge in 1942, was activated as the Breckinridge Job Corps Center in 1965, and renamed the Earle C. Clements Job Corps Center in 1980.

#### **5.4.1.1 Hazardous Materials and Non-hazardous Solid Waste**

Investigations under CERCLA for the area encompassing the former Camp Breckinridge is under the purview of the U.S. Army Corps of Engineers (USACE), Louisville District, acting as the lead agency for the remediation of Federal Facilities within the framework of the Defense Environmental Restoration Program (DERP) for Formerly Used Defense Site (FUDS). Numerous assessments, investigations, remediation, and ordnance clearances have been conducted throughout the approximately 36,000 acres and include but are not limited to the following:

- Camp Breckinridge Decontamination and Unexploded Ordnance (UXO) Clearance, 1963-1964 (Plexus Scientific Corporation 2008)
- Site Investigation, 1993; Additional Site Investigation, 1994, and Site Sampling Report, 1995, at United Technologies Automotive Systems, Inc., Morganfield, KY (Plexus Scientific Corporation 2008)
- Construction Certification, Cap Construction, and Four Shallow Groundwater-Monitoring Wells, Earl C. Clements Job Corps Center Residential Landfill, Permit No. 113-00006 (Plexus Scientific Corporation 2008)
- Archives Search Report for munitions and explosives of concern (MEC), 1994 (Plexus Scientific Corporation 2008)
- Preliminary Assessment, Final Revision 1, Former Camp Breckinridge, Morganfield, Union County, Kentucky. FUDS No. GO4KY002800, 2008 (Plexus Scientific Corporation 2008)

- Site Inspection Report, Site Inspection for Underground Storage Tanks, Site Investigation, Former Camp Breckinridge, Morganfield, Union County, Kentucky, 2011 (URS 2011)
- Final Site Inspection Report, Site Inspection, Former Camp Breckinridge, Union County, Kentucky W912QR-08-D-001, Task Order No. 0006, AI#52456, 2011 (URS 2017a)
- Final Remedial Investigation, Volume 1 of 5 (Report & Figures), Remedial Investigations, Former Camp Breckinridge, Union County, Kentucky, W912QR-12-D-0023, Delivery Order 0001, AI#52456, 2017 (URS 2017b)

The Preliminary Assessment (PA) was conducted in 2006 (the PA was revised in 2008) to identify existing conditions at the former Camp Breckinridge property and to assess any potential threat to human health and the environment (Plexus Scientific Corporation 2008). The PA reviewed available file information, collection and reviewed historic aerial photographs, conducted interviews, and conducted site reconnaissance. Facility types and areas of environmental interest associated with former Camp Breckinridge were identified such as motor pools/repair shops, grease and inspection racks, fueling stations, dumps and landfills, and weapons ranges (Plexus Scientific Corporation 2008). In addition, commercial and industrial activities by private property owners after DoD transferred the property were also documented including the Earle C. Clements Job Corps Center proper and its residential landfill (Plexus Scientific Corporation 2008:2-8, 2-9).

The PA identified 61 areas of interest that may have resulted in releases of contaminants within the former Camp Breckinridge property boundaries: eighteen areas are associated with DoD operations (1942-1962), three areas reflect both DoD and post-DoD activities, twenty-seven areas represent post-DoD activities (post-1962), and nineteen areas provided no discernable releases based on historic aerial photographs. The primary sources of DoD contamination was related to the locations of specific facility types or former activity areas: motor pools/repair shops (n=29), grease and inspection racks (n=16), wash racks (n=27), fueling stations (n=11), oil storage houses (n=33), gasoline storage house (n=1), paint shop and paint storage (n=3), radio shops (n=4), dumps and landfills (n=4), weapons ranges, the rail yard, and the power plant and coal yard (Plexus Scientific Corporation 2008).

Based on the recommendations in the PA, Site Inspection (SI) activities including both soil and groundwater sampling were conducted targeting the former locations of eight fueling stations, eleven wash racks, six grease and inspection racks, nineteen motor pool/repair shops, and two waste disposal areas within the former Camp Breckinridge property (URS 2011).

Remedial Investigations (RI) were conducted based on the SI recommendations for two motor pool/repair shops (presence of metals in soil), two wash racks (presence of metals in soil), one grease and inspection rack (presence of metals in groundwater), and three fueling stations (soil and groundwater contamination above regulatory limits) (URS 2017a, 2017b). The results of the SI and RI are discussed further in section 5.4.1.2. A Feasibility Study (FS) was recommended to develop, evaluate, and recommend remedial action to address the groundwater contamination from the former fueling stations. As of June 2020, no FS has been completed.

#### **5.4.1.2 Soil and Groundwater Contamination**

Soil and groundwater samples were collected and analyzed as part of the SI and RI activities described in section 5.4.1.1. Most locations exhibited Benzene, Toluene, Ethylbenzene, and Xylene (BTEX) compounds, Polycyclic Aromatic Hydrocarbons (PAHs), Volatile Organic Compounds (VOCs), Semi-volatile Organic Compounds (SVOCs) and metals but the concentrations detected were below any screening criteria (data was screened using USEPA Regional Soil Screening Levels for Chemical Contaminants at Superfund Sites)(URS 2011:4-5). Three fueling stations, two wash racks, one grease and inspection rack and two motor pool/repair shops contained contaminants above the established screening criteria and were recommended for further investigation (URS 2011:12-3, 12-4). The remedial investigation contributed the presence of metals in the soils and groundwater to be naturally occurring and no further action would be required at those locations. However, groundwater sampling at the locations of the three former fueling stations identified VOCs and SVOCs with low level PAHs, some of which exceeded their respective project action limits. Three VOCs/SVOCs groundwater plumes were documented for each of the former fueling station locations (URS 2017a, 2017b).

Two locations to be addressed in a subsequent FS (URS 2017a, 2017b) occur within the parcels proposed for excess property disposal: former Camp Breckinridge Grease and Inspection Rack 2 located in the Tract 1 and former Camp Breckinridge Fueling Station 6 located in Tract 2 (Figure 5).

Tract 1. The analysis of soil samples at the location of former Grease and Inspection Rack 2 indicated that surface soil is unlikely to pose unacceptable cancer risks or non-cancer health effects to site workers, trespasser/recreators, construction workers, or residents. The analysis of groundwater samples at the location of former Grease and Inspection Rack #2 indicated that incidental ingestion of manganese containing groundwater may pose unacceptable cancer risks and non-cancer health effects for residents (URS 2017b:7-15 to 7-17).

Tract 2. The analysis of soil samples at the location of former Fueling Station 6 indicated that surface soil is unlikely to pose unacceptable cancer risks or non-cancer health effects to site workers, trespasser/recreators, construction workers, or residents. The analysis of groundwater samples at the location of former Fueling Station 6 indicated the dermal exposure, ingestion, and inhalation of benzene containing groundwater may pose unacceptable cancer risks and non-cancer health effects for construction workers and residents (URS 2017b: 7-17 to 7-20).

#### **5.4.1.3 Landfills**

Seven waste disposal, landfills or fill areas occur within the Earle C. Clements Job Corps Center property and represent refuse disposal initiated during the former Camp Breckinridge occupation with some continued use during post-DoD operations (Figure 5). Six waste disposal, landfill, or fill areas are located within the two parcels proposed for excess property disposal.

Tract 1. Area DDD was identified as a rectangular ground scar in 1993 with evidence of linear scarring suggesting trench disposal practices with continued ground disturbance through 1998 (Plexus Scientific Corporation 2008: 2-53).

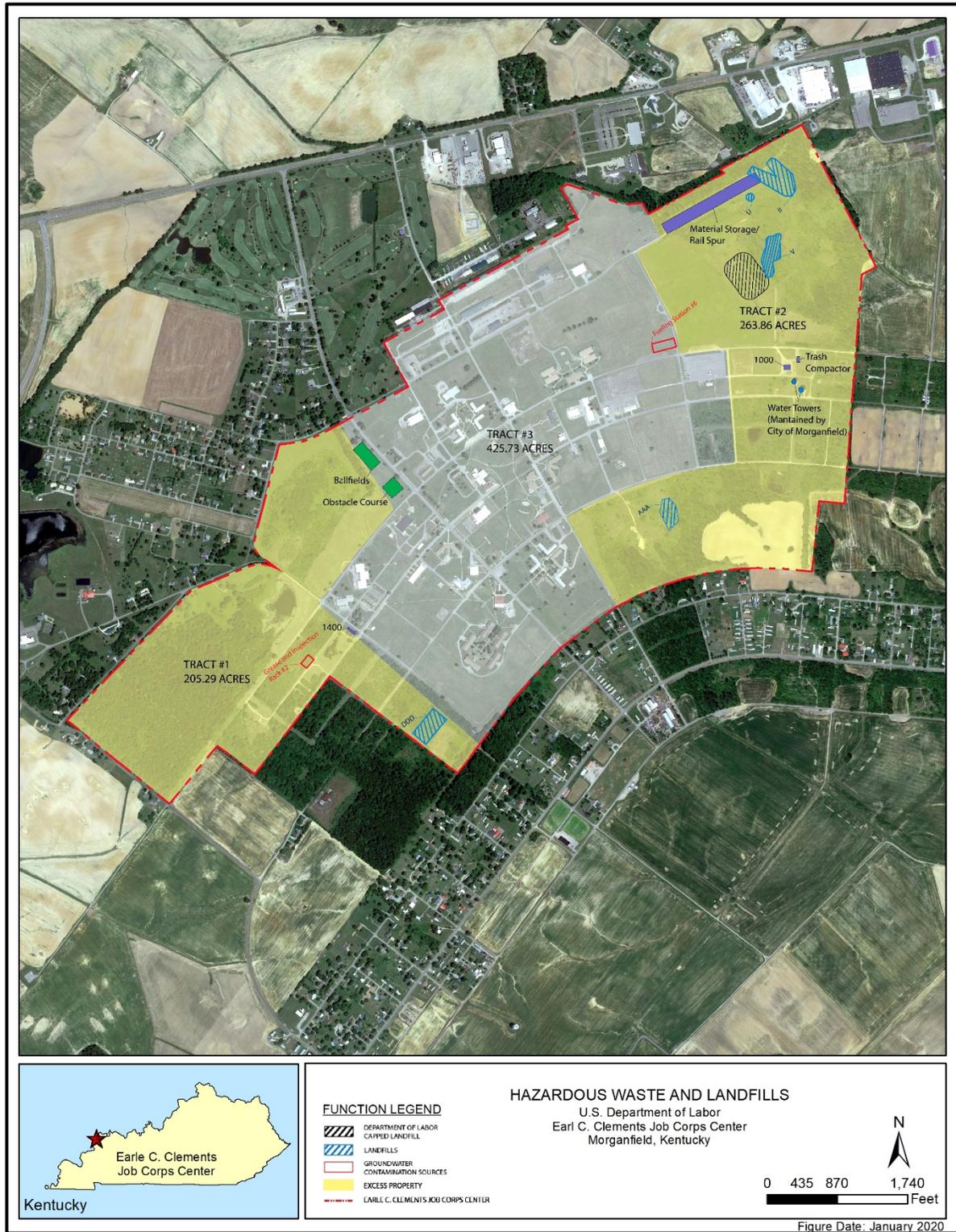


Figure 5. Earle C. Clements Job Corps Center Hazardous Waste and Landfills

Tract 2. Five landfill or waste disposal areas are located within the east parcel and consist of Areas U, V, III, AAA, and the Earle C. Clements Job Corps Center landfill. Area U is characterized as a broad, trench-line feature identified on the 1950 aerial that had been filled in with lighter-colored soil by 1959 (Plexus Scientific Corporation 2008: 2-28). Further investigations at Area U were conducted including soil and groundwater sampling (URS 2011). No chemicals or metals were detected above screening levels in both soil and groundwaters samples (data was screened using USEPA Regional Soil Screening Levels for Chemical Contaminants at Superfund Sites)(URS 2011:4-5). This area is currently an agricultural field and it was assumed that the future use will remain agricultural. No threats to human health or the environment exist (URS 2011:10-6). Area V was the location of the central disposal facility for Camp Breckinridge from 1950-1959. This area contained three incinerators with smoke stacks and evidence of open dumping. Linear scarring present on the 1950 aerial photograph suggests previous trench disposal practices. Between 1959 and 1998, this area experienced episodes of open dumping, additional trench disposal, and inactivity (Plexus Scientific Corporation 2008: 2-37-2-38) Area AAA was identified as a fill area with both light and dark soils on a 1993 aerial. Earthmovers suggesting possible disposal operations were present on the 1998 aerial (Plexus Scientific Corporation 2008: 2-52).

The Earle C. Clements Job Corps Center operated a 3.6-acre residential landfill from 1987 to 1992. It received wastes from the kitchen and dining facilities and paper product waste from the classrooms. In 1991, with the approval of KDEP's Division of Waste Management, roofing materials containing non-friable asbestos-containing material (ACM) was bagged and disposed of in this landfill. The landfill stopped accepting waste and closed in July 1992 (Plexus Scientific Corporation 2008:2-9, 2-13). After closures, the landfill was covered with a clay cap and vegetation, and four groundwater-monitoring wells were installed. Groundwater and surface water sampling has been conducted quarterly with no reported exceedances (Plexus Scientific Corporation 2008:2-9, 2-13).

#### **5.4.1.4 Onsite Hazardous Materials**

Hazardous wastes stored and handled at the Earle C. Clements Job Corps Center (Plexus Scientific Corporation 2008:2-8, 2-9) include:

- Acetic Acid
- Ammonium Hydrochloride
- Ammonium Hydroxide
- Arabic Gum
- De-glazing Solvents
- Dyes
- Ethylene Glycol
- Grease
- Hydroquinone
- Isoparatin Hydrocarbon
- Latex Paint
- Linseed Oil
- Mineral Oil

- Monoethanolamine
- Oils
- Oil-Based Paint
- Paint Thinner
- Perchloroethylene
- Pesticides
- Petroleum Naphtha
- Sodium Hypochlorite
- Sodium Sulfate
- Solvents
- Sulfuric Acid
- Tar Pitch
- Toluene
- Trisodium Phosphate
- 1,1,1, Trichlorethylene

No hazardous materials associated with the Earle C. Clements Job Corps Center are used or stored within the two parcels proposed for excess property disposal.

An asbestos survey was conducted in 1990 (DOL 2017b) and asbestos-containing materials such as a boiler gasket, linoleum floor tile, tile mastic, roof flashing, vibration joint cloth, duct tape, boiler caulking, sheeting on beams, pipe fitting insulation, cement board, boiler exhaust insulation, were identified in 30 buildings and structures at the Earle C. Clements Job Corps Center.

Tract 1. Building 1400 contains asbestos-containing materials in the boiler room. These materials are one vibration joint cloth, 10 linear feet of asbestos duct tape, 25 linear feet of boiler caulking, and 30 square feet of asbestos sheeting on beams (DOL 2017b).

Building 1400 was constructed in 1942 as part of the former Camp Breckinridge and due to the age of the building, lead-based paint (LBP) is likely present in the building. Metal siding has been installed over the original wood siding which may encapsulate any exterior LBP.

Tract 2. No buildings or structures with asbestos-containing materials are located within the East Parcel.

Radon testing was conducted in 1990 in 57 buildings on the Earle C. Clements Job Corps Center campus (DOL 2017b). All of the buildings, including Building 1400, registered radon levels less than 4.0 picoCuries per liter of air (pCi/L). The USEPA has established a radon action level of 4.0 pCi/L. Buildings with radon concentrations less than 4.0 pCi/L do not require mitigation.

#### **5.4.1.5 Underground Storage Tanks/Aboveground Storage Tanks**

Underground storage tanks (USTs) are exclusively associated with the former Camp Breckinridge occupation and aboveground storage tanks (ASTs) are exclusively identified with activities on the Earle C. Clements Job Corp Center. Site investigations for underground storage tanks (USTs) were conducted in 2011; geophysical surveys provided evidence the USTs and associated piping were likely to occur at three locations associated with the former Camp

Breckinridge: Fueling Stations 6 and 7, and the Bakery (URS 2017b:1-7). Nine ASTs occur within the Earle C. Clements Job Corps Center; however, only seven ASTs are still in use (DOL 2017b).

Four approximately 12,000-gallon underground storage tanks (UST), fill pipes, and distribution piping associated with two locations of former Camp Breckinridge Fueling Stations 6 and 7 were removed and backfilled in 2013 (URS 2017b: 1-8- 1-13). The UST co-located with the Bakery was also removed. The tanks at former Camp Breckinridge Fueling Station 6 contained small quantities of oily water, the result of stormwater seepage in the post-Camp Breckinridge period. The tanks at former Fueling Station 7 were completely full of oily water. Excavated soil surrounding the USTs was screened with a Flame Ionization Detector (FID) and stockpiled accordingly as 'clean' or 'potentially contaminated.' All contaminated soil and oily sludges were sent off-site for appropriate disposal. Clean soil was used as backfill over the USTs excavations.

Tract 1. No USTs associated with Camp Breckinridge were identified within the West Parcel during the archival research conducted for the PA (Plexus Scientific Corporation 2008 2-14).

Tract 2. The USTs associated with the location of former Fueling Station #6 have been removed from the East Parcel; no other USTs have been identified in this parcel. This former UST location is associated with the source of groundwater contamination discussed in 5.4.1.2.

The seven active ASTs on Earle C. Clements Job Corps Center consist of two 250 gallon tanks for waste oil and diesel fuel, four 1000 gallon tanks (three for diesel fuel and one for waste oil), and one 600 gallon propane tank (DOL 2017b). None of the seven ASTs are located within the two parcels proposed for excess property disposal.

## **5.4.2 Environmental Consequences**

In this section the potential impacts to hazardous and toxic substances that could result from no action and proposed action alternatives are described.

### **5.4.2.1 No Action Alternative**

There would be no impacts under this alternative. DOL would be expected to continue to manage all hazardous and toxic substances. No changes to the existing baseline conditions for hazardous and toxic substances are anticipated.

### **5.4.2.2 Proposed Action Alternative**

Under the proposed action alternative, DOL would dispose of the property through GSA and GSA as disposal agent would oversee a public sale of the property. The proposed action will evaluate a reuse in which 50 acres of Tract 1 would be Low Density Residential District (R-1). About 155.29 acres in Tract 1 would be zoned as agricultural (A-1). For Tract 2, about 160 acres comprising the northern portion of Tract 2 would be rezoned as Light Industrial District (I-1) and about 103.86 acres in the central and southern portion of Tract 2 would be rezoned as agricultural (A-1).

DOL would remove any personal property items including Petroleum, Oils, and Lubricants (POLs) or other chemicals remaining from operation of the Job Corps Center prior to transferring the property to GSA for public sale.

For this alternative, any existing structures or foundations would be removed from the excess property and new residential buildings or industrial facilities would be constructed and agricultural fields would be cleared. Upon sale of the property and prior to building demolition, the purchaser of the property would be responsible for the assessment and management of any hazardous and toxic substances including LBP, ACM, and PCBs within the proposed project area and undertake any necessary abatement or remediation required, under applicable laws and regulations, to achieve residential reuse requirements. Although it is expected that all buildings would be demolished and LBP would be abated prior to demolition, as required, any remaining LBP would not present an unacceptable risk to human health, because the purchaser would covenant and agree that it would not permit the occupancy or use of any buildings or structures on the property as Residential Property, as defined under 24 CFR Part 35, without complying with this section and all applicable federal, state, and local laws and regulations pertaining to LBP and/or LBP hazards.

It is expected that all buildings would be demolished and ACM would be abated prior to demolition, as required. ACM would not present an unacceptable risk to human health because the purchaser would assume responsibility for abatement or management of any ACM in accordance with applicable federal, state, and local requirements.

For the remaining USTs, federal facilities are subject to closure requirements and if contamination is present, remediation may be required to prevent harmful exposures subsequent to transfer (Congressional Research Service 2014). There are no USTs associated with Tract 1, and the USTs associated with Tract 2 have been removed; no other USTs have been identified in Tract 2. The two sites of groundwater contamination are shown on Figure 5. Under CERCLA releases of hazardous substances are the responsibility of the federal government to clean up prior to property transfer out of federal ownership. There are a variety of available remediation technologies that may include, but not be limited to, excavation, in situ bioremediation, pump and treat, or capping a site (USEPA 2019). The type, degree, and cost of remediation varies depending on the level of contamination and the potential reuse. Any remediation would meet state and federal regulations; therefore, no significant impacts are expected.

## **5.5 LAND USE**

This section describes the land use, as well as potential impacts that could result from the no action alternative or implementation of the proposed action alternative.

### **5.5.1 Affected Environment**

The Earle C. Clements Job Corps Center was formerly part of a U.S. Army military installation, Camp Breckinridge.

The proposed project area is in Union County and is thereby subject to regulations and laws outlined within the County's Municipal Zoning Ordinance (Union County 2019a). The

Municipal Ordinance applies to the City of Morganfield, the City of Waverly, and the City of Sturgis as it was adopted by these municipalities under Section 103 of the Ordinance (Union County 2019a).

The portions of Tracts 1, 2, and 3 overlap parcel 76-21 which is characterized as Exempt Federal under Union County records (Table 2; Schneider Geospatial 2020). Part of Tract 1 overlaps parcel 77-29 which is designated by the County as Exempt Other. The two tracts to be disposed of by DOL are predominantly vacant land with a mixed composition of wood land, shrubs, and grass-covered fields (AcreValue 2019). The land topography of undeveloped and agricultural land were determined using the AcreValue online database (AcreValue 2019).

Tract 1, a 205.29-acre area, is flanked by Kentucky Highway 2091 to the west, Heriges Lane to the north, Center athletic fields along Main Entrance Road to the east, and privately-owned parcels along Meadows Road to the south.

Tract 2, a 263.86-acre area, is bounded by the portion of the Center to remain (Tract 3) to the west, an unnamed roadway connected to Flourney Rd to the north, several city-owned and privately-owned properties to the east, and private property along Meadows Road to the south. Agricultural land containing corn and soybean crops are present between Road C and Meadows Road.

#### **5.5.1.1 Compatible Land Use**

Existing zoning designations for properties discussed in this report were determined through a cross-reference analysis of Union County Municipal Zoning Ordinance with Union County property tax record database provided by Schneider Geospatial (Schneider Geospatial 2020). Based on available information, the zoning designation was presumed for the following properties.

Land use south and southwest of Tract 1 consists of cropland alongside land occupied by single-family homes. The surrounding cropland, zoned A-1 Limited Agricultural District, is primarily used to cultivate soybeans and corn (Union County 2019a). Homes in the area are located on subdivisions between 0.3 acres to 1.6 acres in size and are zoned as R-1 Low Density Residential District (Schneider Geospatial 2020).

The parcels north of Tract 1 are within the City of Morganfield municipal boundary and contain a variety of community uses falling within the R-1 and R-2 Low Density Residential District zoning designation. Local community establishments include Camp Breckenridge Museum and Art Center, Countryside Baptist Church, and Breckinridge Golf Course. There are several croplands south of Tract 1 zoned A-1 Limited Agricultural District by the County. Further south along Meadows Road are residential properties (single family and mobile homes), a fire station, and a church stretching from Road 2 to Road 10.

Land use north of Tract 2, both within and outside of the City of Morganfield along U.S. Route 60, includes a restaurant, a veterinary clinic, and a retirement community. Various industrial uses such as a rubber tire supplier, a manufacturer, a wholesaler, and a fertilizer supplier also occupy land off of Route 60 just north of Tract 2. This diverse range of uses is permitted under B-2 and I-1 zoning designations (Schneider Geospatial 2020).

The Morganfield Industrial Park, a 151.7-acre site consisting of thirteen (13) tracts ranging from 5.5 to 25.2 acres, is located east of the Job Corps Center (Kentucky Cabinet for Economic Development [KYCED] 2017). While a majority of its tracts are publicly owned by the City of Morganfield at the time of writing, the industrial park is anticipated to accommodate I-1 Light Industrial uses (Kentucky Economic Development Council [KYEDC] 2015). Currently, private businesses in the industrial park occupy about 36.16 acres. This number is anticipated to increase as more businesses move into the Morganfield Industrial Park.

To the south of Tract 2 past Meadows Road lies a community of single-family residential homes stretching from Road 12 to Road 18. Beyond this residential enclave, there is undeveloped land owned by Union County and private landowners. Agricultural uses are predominant towards the east and southeastern portion of Tract 2. At the southeastern corner of Tract 2, cropland is encroaching on federally owned property at the Job Corps Center. Cropland from adjacent parcel 87-10 owned by Edmund Bickett Farms KY LLC occupies a portion of the property (Figure 2).

### **5.5.2 Environmental Consequences**

In this section the potential impacts to land use that could result from the no action and proposed action alternatives are described.

#### **5.5.2.1 No Action Alternative**

There would be no impacts to land use under this alternative. The property would be expected to continue to contain the current number of buildings, structures, and associated parking areas as in the existing site plan (Figure 3). DOL would continue management and maintenance responsibilities for the unoccupied Job Corps Center but this would have no impacts on land use in the area.

#### **5.5.2.2 Proposed Action Alternative**

After the primary action of disposal, the excess property at the Earle C. Clements Job Corps Center will transferred to another entity as part of the secondary action. The excess property would undergo a series of screenings by GSA to determine the most appropriate or most likely reuse alternatives. GSA will facilitate the transfer and disposal of the excess property (Tracts 1 and 2) in its current condition with the receiving entity or entities which will ultimately determine the proposed reuse in addition to any change in land use or subdivision required to redevelop the property. Under this proposed action alternative, the excess property is anticipated to remain within Union County following property disposal.

The following potential reuses are based on surrounding compatible land use and guided by the vision of Union County as outlined in the Comprehensive Plan.

Tract 1 may accommodate residential and agricultural reuses. Residential may be comprised of single-family dwellings under the R-1 – Low Density Residential District (Union County 2019a). The principal use of R-1 also allows for related recreational, religious, and educational facilities to be developed on lots with a minimum of 11,000 square feet. In a potential reuse where 50 acres of Tract 1 were divided into 11,000 square foot (0.25 acre) lots, approximately 200 SFH would be available (four [4] lots per acre). This development scenario will result in an average

gross density, assuming an average of one dwelling unit per lot, of approximately 4 dwelling units per acre, occurring within the County's overall population density limit (per section 3.2 of the County zoning ordinance) of an average gross density of ten (10) dwelling units per acre (Union County 2019a). Full build-out of the housing units would most likely occur over the span of several years. As 200 SFH is the maximum allowed on 50-acres of land per County regulations, actual development may result in a lower number of housing with some housing units located on lots greater than 11,000 square feet.

In addition to low density residential, agricultural land would make-up the remaining 155.29 acres of the 205.29 acre of Tract 1 under the A-1 Limited Agricultural District zoning designation.

Existing street-grid infrastructure between W Road and 75th Infantry Road could be a guide for the planning of the future residential development. Reuse of the property as residential would provide residents and the community additional housing options near existing residential neighborhoods.

Opportunities to designate a portion of the excess land as open space for recreational and communal purposes based on the current forested and undeveloped topography of parcels 77-29 and 76-21 are also possible. Per section 703 – Open Space are allowed under A-1 designation (Union County 2019a). Reuse of a portion of Tract 1 as open space would provide the community with a place for recreational opportunities and physical fitness that would also strengthen community identity.

Tract 2, based on the variety of uses surrounding its boundary, exhibits potential to assume multiple uses. One of these uses is the I-1 Light Industrial District which would encompass 160 acres of Tract 2 within the northern portion. There is potential to expand the existing Morganfield Industrial Park off U.S. Route 60 and Flourney Road with the addition of a 160-acre area bounded by Roosevelt Road to the west, Road A to the south, private property to the east, and Flourney Road to the north. Growth in manufacturing and warehousing uses could provide beneficial economic and employment opportunities in the County. Development of industrial facilities will comply with building zoning and codes set forth under Union County Municipal Zoning Ordinance, thereby facilitating compatibility with their surroundings.

In this development scenario, the remaining 103.86 acres of Tract 2, comprising of the middle and southern section of the tract, would be zoned A-1 Limited Agricultural District. The zoning designation would be compatible with existing agricultural lands, such as those between Road C and Meadows Road, that surrounds this section of Tract 2.

Depending on the reuse decision that is ultimately made by the receiving entity, there would either be minimal to moderate impacts to land use under this proposed action alternative. Should the decision be to adopt the land uses covered in this reuse alternative, the receiving entity would undergo a zoning change process overseen by the Union County Board of Adjustment (Union County 2019a). The land will be prepared as necessary through construction activities such as clearing, grading, and paving based on each case of development. New construction would be accomplished to conform with Union County zoning and building codes to ensure that the reuse would be consistent and compatible with their surroundings.

## **5.6 SOCIOECONOMIC ENVIRONMENT**

This section describes the existing socioeconomic conditions, as well as potential impacts that could result from the no action alternative or proposed action alternative. While the Center is designated by DOL as being in Morganfield, Kentucky, data collected from U.S. Census Bureau (USCB) and Union County Comprehensive Plan shows that the Center is located outside of city limits and within the Breckinridge Center Census-Designated Place (CDP). The Breckinridge CDP is used as the basis for analysis for Socioeconomics in this EA.

The region of influence for socioeconomic analysis includes areas within which the proposed project could alter economic activity, housing, public services, environmental justice, or health and safety of children, either directly or indirectly, during construction and operations. Two scales were chosen to provide local and regional constraints within the data collection process: the Project Study Area and the Regional Study Area. The Project Study Area encompasses Census Tract 9502.01 Block Group 2, a census-designated place (CDP) officially titled Breckinridge Center. This is a former designated title of the Earle C. Clements Job Corp Center that has not been updated. The CDP has a total area of 5.6 square miles.

The Regional Study Area is designated as the municipal boundary of Union County. The County encompasses the cities of Morganfield, Sturgis, Uniontown, and Waverly in addition to the Breckinridge Center CDP.

The findings discussed in Section 5.7 are based on analysis of American Community Survey (ACS) 5-Year Survey data by the U.S. Census Bureau. Additional demographic data is sourced from the U.S. Department of Commerce, Bureau of the Census.

### **5.6.1 Affected Environment**

In this section, current socioeconomic conditions with the potential to be affected by the proposed action alternative are presented.

#### **5.6.1.1 Economic Development**

##### **Local Economic Activity**

Analysis of local economic activity is confined to the Project Study Area. Table 7 shows the various industries with jobs held by employees 16 years and over within the Breckinridge Center CDP. The area exhibited high job growth trends from 2014 to 2018 in the industries of manufacturing, transportation and warehousing and utilities, educational services, as well as healthcare and social services. Although those employed in the agriculture industry has declined locally in recent years, it still is estimated to employ approximately 8 percent of the total number of civilians employed within the Project Study Area in 2018.

A 2016 report by the U.S. Census Bureau states that agriculture, forestry, fishing, hunting and mining are no longer the top industries in many rural areas, they still employ one out of 10 workers in rural counties (Laughlin 2016). The report also mentioned the diversification of many rural counties since the mid-20<sup>th</sup> century to where the highest percentages of civilian labor force employment today, measured as those 16 years and over, fall within the industries of educational

services, and health care and social assistance (22.3 percent), manufacturing (12.1 percent), and retail trade (10.9 percent). Some of these national trends are reflected locally in the economy of Breckinridge CDP with triple-digit percentage point growth in healthcare and social assistance, transportation and warehousing, and arts, entertainment, and recreation industries between 2014 and 2018 as shown in Table 8. Jobs within manufacturing, utilities, and public administration have also experienced a surge in the same timeframe. The Project Study Area has seen a decline in professional and administrative jobs as well as positions in real estate, information, and wholesale trade (USCB ACS 2014-2018).

**Table 8. Industry of Civilian Employed 16 Years and Over – Breckinridge Center CDP**

Subject	2014	2018	Percent Change (2016-2018)
<b>Civilian employed population 16 years and over</b>	528	653	24%
<b>Agriculture, forestry, fishing and hunting, and mining:</b>	86	52	-40%
Agriculture, forestry, fishing and hunting	61	25	-59%
Mining, quarrying, and oil and gas extraction	25	27	8%
<b>Construction</b>	0	0	0%
<b>Manufacturing</b>	85	151	78%
<b>Wholesale Trade</b>	5	0	-100%
<b>Retail Trade</b>	77	73	-5%
<b>Transportation and warehousing, and utilities:</b>	17	33	94%
Transportation and warehousing	4	10	150%
Utilities	13	23	77%
<b>Information</b>	4	0	-100%
<b>Finance and insurance, and real estate and rental and leasing:</b>	3	0	-100%
Finance and insurance	0	0	0%
Real estate and rental and leasing	3	0	-100%
<b>Professional, scientific, and management, and administrative and waste management services:</b>	40	35	-13%
Professional, scientific, and technical services	11	9	-18%
Management of companies and enterprises	0	0	0%
Administrative and support and waste management services	29	26	-10%
<b>Educational services, and health care and social assistance:</b>	89	174	96%
Educational services	33	36	9%
Health care and social assistance	56	138	146%
<b>Arts, entertainment, and recreation, and accommodation and food services:</b>	72	97	35%
Arts, entertainment, and recreation	13	29	123%
Accommodation and food services	59	68	15%
<b>Other services, except public administration</b>	41	26	-37%
<b>Public administration</b>	9	12	33%

Source: U.S. Census Bureau, 2014-2018 American Community Survey 5-Year Estimates (USCB ACS 2014-2018)

Data on the income range of households within the Project Study Area, as shown in Table 9, depicts positive upward movement between income brackets from the years 2014-2018. Households within the lower-tier income brackets under \$25,000 decreased while those in the higher income brackets ranging from \$25,000 and \$75,000 rose. This upward movement in household income range could be an indicator of growth in higher-paying jobs within the Project Study Area. An 11 percent decline in the total households in the project from 2014 to 2018. The area’s median household income increased from \$21,036 in 2014 to \$32,313 in 2018. Breckinridge Center CDP is a lower income area when compared to the 2018 median household income of Union County (\$42,844) and the State of Kentucky (\$48,392). There are twenty households within the Project Study Area earning between “\$100,000 to \$149,999” and none surpassing that threshold (USCB ACS 2014-2018).

**Table 9. Income in the Past 12 Months (In 2014 and 2018 Inflation-Adjusted Dollars Respectively) – Breckinridge Center CDP**

<b>Income Range</b>	<b>2014</b>	<b>2014 (Percentage)</b>	<b>2018</b>	<b>2018 (Percentage)</b>	<b>Percent Change (2014-2018)</b>
<b>Total households</b>	287	-	255	-	-11%
<b>Less than \$10,000</b>	30	10.5%	12	4.7%	-60%
<b>\$10,000 to \$14,999</b>	36	12.5%	0	0.0%	-100%
<b>\$15,000 to \$24,999</b>	130	45.3%	44	17.3%	-66%
<b>\$25,000 to \$34,999</b>	32	11.1%	76	29.8%	138%
<b>\$35,000 to \$49,999</b>	50	17.4%	75	29.4%	50%
<b>\$50,000 to \$74,999</b>	9	3.1%	28	11.0%	211%
<b>\$75,000 to \$99,999</b>	0	0.0%	0	0.0%	-
<b>\$100,000 to \$149,999</b>	0	0.0%	20	7.8%	-
<b>\$150,000 to \$199,999</b>	0	0.0%	0	0.0%	-

<b>\$200,000 or more</b>	0	0.0%	0	0.0%	-
<b>Median Household Income (Dollars)</b>	\$21,036	-	\$32,313	-	54%
<i>Source: U.S. Census Bureau, 2014-2018 American Community Survey 5-Year Estimates (USCB ACS 2014-2018)</i>					

### Regional Economic Activity

The regional economic activity analysis was conducted at the county-level with a focus on Union County. The Regional Study Area exhibited high growth from 2014 to 2018 within the construction, utilities, information, administrative support and waste management services industries as shown in Table 10. While the County showed growth manufacturing jobs, those within the agriculture, forestry, fishing and hunting, and mining saw a 26 percent decrease from 2014 to 2018. Two of the most represented age groups in Rural America, according the U.S. Census Bureau, are baby boomers in their 50s and 60s followed by those in their late teens and twenties (Day et al. 2016). These two age cohorts are more likely to rely on services provided by educators and healthcare practitioners who work within the educational services, and health care and social assistance industries, respectively. The local and county areas both have young adults ages 15 to 24 years of age among the most represented age group, appear to reflect this demand, with the exception of a 5 percent decline in educational services jobs. as the number of civilian in these jurisdictions are increasingly employed in more white-collar sectors such as educational services, and health care and social assistance industries and professional, scientific, and management, and administrative and waste management services. County-wide growth in the construction and information sectors is not shared at the local level (USCB ACS 2014-2018).

**Table 10. Industry of Civilian Employed 16 Years and Over – Union County**

Subject	2014	2018	Percent Change (2014-2018)
<b>Civilian employed population 16 years and over</b>	5,831	6,230	7%
<b>Agriculture, forestry, fishing and hunting, and mining:</b>	1,219	904	-26%
Agriculture, forestry, fishing and hunting	366	259	-29%
Mining, quarrying, and oil and gas extraction	853	645	-24%
<b>Construction</b>	158	320	103%
<b>Manufacturing</b>	718	1,128	57%
<b>Wholesale Trade</b>	122	116	-5%
<b>Retail Trade</b>	782	667	-15%
<b>Transportation and warehousing, and utilities:</b>	337	461	37%
Transportation and warehousing	226	253	12%
Utilities	111	208	87%
<b>Information</b>	12	36	200%
<b>Finance and insurance, and real estate and rental and leasing:</b>	196	113	-42%
Finance and insurance	126	83	-34%
Real estate and rental and leasing	70	30	-57%
<b>Professional, scientific, and management, and administrative and waste management services:</b>	250	278	11%

Professional, scientific, and technical services	150	99	-34%
Management of companies and enterprises	0	7	-
Administrative and support and waste management services	100	172	72%
<b>Educational services, and health care and social assistance:</b>	1,250	1,348	8%
Educational services	443	423	-5%
Health care and social assistance	807	925	15%
<b>Arts, entertainment, and recreation, and accommodation and food services:</b>	331	369	11%
Arts, entertainment, and recreation	39	54	38%
Accommodation and food services	292	315	8%
<b>Other services, except public administration</b>	298	228	-23%
<b>Public administration</b>	158	262	66%
<i>Source: U.S. Census Bureau, 2014-2018 American Community Survey 5-Year Estimates (USCB ACS 2014-2018)</i>			

Incomes in the past 12 months from 2014 to 2018 for households within Union County are shown in Table 11. Household income at the county level shows similar patterns to that of local levels; both exhibit a decline in households earning less than \$25,000. Moving higher up in the earnings bracket, the similarities between Union County and Breckinridge Center CDP teeter off. The County exhibited double-digit percentage growth in the “\$100,000 to \$149,999” and “\$200,000 or more” household income brackets, levels that have only been reportedly attained by 20 household within the local level. From 2014-2018, no households in the Project Study Area reportedly earned over \$150,000 while about 221 households in Union County reportedly earned over that amount. Median household income in Union County grew by 12 percent within the same period (USCB ACS 2014-2018).

**Table 11. Income in the Past 12 Months (In 2014 and 2018 Inflation-Adjusted Dollars Respectively) – Union County**

Income Range	2014	2014 (Percentage)	2018	2018 (Percentage)	Percent Change (2014-2018)
<b>Total households</b>	5,620	-	5,465	-	-3%
<b>Less than \$10,000</b>	525	9.3%	400	7.3%	-24%
<b>\$10,000 to \$14,999</b>	491	8.7%	280	5.1%	-43%
<b>\$15,000 to \$24,999</b>	964	17.2%	756	13.8%	-22%
<b>\$25,000 to \$34,999</b>	590	10.5%	769	14.1%	30%

<b>\$35,000 to \$49,999</b>	990	17.6%	991	18.1%	0%
<b>\$50,000 to \$74,999</b>	744	13.2%	774	14.2%	4%
<b>\$75,000 to \$99,999</b>	646	11.5%	592	10.8%	-8%
<b>\$100,000 to \$149,999</b>	466	8.3%	682	12.5%	46%
<b>\$150,000 to \$199,999</b>	119	2.1%	127	2.3%	7%
<b>\$200,000 or more</b>	85	1.5%	94	1.7%	11%
<b>Median Household Income (Dollars)</b>	\$38,367	-	\$42,844	-	12%
<i>Source: U.S. Census Bureau, 2014-2018 American Community Survey 5-Year Estimates(USCB ACS 2014-2018)</i>					

### 5.6.1.2 Population Demographics

Union County has an estimated 2018 population of 14,802, down from a population of 15,192 in 2014 (USCB ACS 2014-2018: 5-Year Estimate, Age and Sex). As of 2018, the population of the Breckinridge Center CDP was reported as 2,363, up from a 2014 population of 2,216 (USCB ACS 2014-2018). This information is shown on Table 12. The number of individual participating in the labor force in the Project Study Area grew from 550 in 2014 to 903 in 2018 (USCB ACS 2014-2018: 5-Year Estimate, Selected Economic Characteristics). The Local Study Area has a median age is 21.4 and 80 percent of the population is over 18 (USCB ACS 2014-2018: 5-Year Estimate, Age and Sex). Union County has a median age of 37.6 and approximately 80 percent of the population is over 18 (USCB ACS 2014-2018). Approximately 45.2 percent of the population of Breckinridge Center CDP identified themselves as white alone (USCB ACS 2014-2018: 5-Year Estimate, Sex by Age, White Alone) and approximately 42 percent identified as Black or African American alone (USCB ACS 2014-2018: 5-Year Estimate, Sex by Age, Black or African American Alone). The median household income for 2018 at Breckinridge Center CDP was \$32,313. The percentage of residents reported as living the below poverty level in 2018 is 69.3 percent, a reduction from 2014 values of 80.7 percent (USCB ACS 2014-2018: 5-Year Estimate, Economic Characteristics). The percentage of the population below the poverty level within Breckinridge Center CDP is many times higher than in Union County and the State of Kentucky as shown in Table 12.

**Table 12. Population Forecast in Project Study Area**

	Total Population			Percent Below Poverty Level	
	2014	2018	Percent Change	2014	2018
<b>Breckinridge Center CDP Block Group 2, Census Tract 9502.01</b>	2,216	2,363	7%	80.7%	69.3%
<b>Union County</b>	15,192	14,802	-3%	28.5%	22.2%
<b>Kentucky</b>	4,383,272	4,440,204	1%	18.9%	17.9%
<i>Source: U.S. Census Bureau, 2014-2018 American Community Survey 5-Year Estimates, Total Population, Poverty Status in the Past 12 Months (USCB ACS 2014-2018)</i>					

### 5.6.1.3 Housing

The median value of an owner-occupied housing unit in Breckinridge Center CDP is \$55,000 (Table 13). This is 36 percent less than the median value of owner-occupied housing in Union County, which has a median average of \$86,500. Out of 417 total housing units in Breckinridge Center CDP, 308 or approximately 74 percent are mobile homes with the rest being 1-unit, detached housing units. Approximately 38.8 percent of housing units in Breckinridge Center CDP are owner-occupied while 33.7 percent are renter-occupied.

**Table 13. Housing Characteristics, 2018**

Jurisdiction	Total Housing Units	Percent Vacant	Percent Owner Occupied	Median Value Owner Occupied	Median Rent Renter Occupied	Median Household Income
<b>Breckinridge Center CDP</b>	417	38.8	33.7	\$55,000	\$645	\$32,313
<b>Union County</b>	6,255	12.6	69.3	\$86,500	\$601	\$42,844
<b>Kentucky</b>	1,974,406	12.4	67.0	\$135,300	\$741	\$60,336
<i>Source: U.S. Department of Commerce, Bureau of the Census, 2014-2018 American Community Survey 5-Year Estimates, Selected Housing Characteristics (USCB ACS 2014-2018)</i>						

A search on the National Association of Realtors website for property for-sale within 10 miles of Breckinridge Center CDP revealed 5 single-family homes available. Two homes had a listed price of under \$50,000, while another two were listed between \$100,000 and \$149,000. One single-family home in the area had a listed price of over \$200,000 (National Association of Realtors 2019).

At the time of writing, there are 81 properties for sale: 26 single-family homes, 1 mobile home, 52 undeveloped lands, and 2 farm/ranch lands within 5 miles of Union County. The price breakdown for the listed homes are shown in Table 14. The number of homes with a listed price of up to \$149,999 maintained a consistent range of around 5 or 6 homes. The highest number of homes for sale was 7 homes within the \$200,000 and over category. The number of homes for

sale in Union County exceeds the number of those offered at the local level in Breckinridge CDP for every listed price range.

**Table 14. Single-Family Homes for Sale within 5 miles of Union County**

Listed Price Range	Number of Homes
Less than \$50,000	6
\$50,000 to \$99,999	5
\$100,000 to \$149,999	6
\$150,000 to \$199,999	2
\$200,000 and over	7
<b>TOTAL</b>	<b>26</b>
<i>Source: National Association of Realtors (Realtor.com) 2019</i>	

#### **5.6.1.4 Community Services**

Community services examined include education, health services, law enforcement, fire protection, and recreation.

#### **Education**

Union County Public Schools contains three public elementary schools located in Morganfield, Sturgis, and Uniontown in addition to Union County Middle School and Union County High School. The County also hosts a learning academy that provides an alternative curriculum for students who learn better in a nontraditional setting. In Morganfield Elementary School’s (MES) Comprehensive School Improvement Plan (CSIP) for the 2019-2020 school year, the school reported a significant decrease in high-paying jobs and quality of life for residents within the past three years, which has increased the number of students living in poverty within the County (Stanley 2020). The report states that the downturn in the job market has affected not only the school, but student preparedness as only 50 percent of K students start school ready for the Kindergarten curriculum. This lack of preparation affects their academic performance in subsequent grades. MES has approximately 370 students from Kindergarten through 5<sup>th</sup> grade as of the 2019-20 school year.

A similar report filed by Union County Middle School (UCMS) for the 2019-20 school year, the majority of UCMS students qualify for free or reduced-price lunch and receive lunch free of charge through a community program (Mosby 2019). UCMS serves 493 students in 6<sup>th</sup>, 7<sup>th</sup>, and 8<sup>th</sup> grades and employs thirty-five (35) full-time teachers among other school staff (Mosby 2019). In its Executive School Report for 2019-20, Union County High School reported a student population of nearly 700 students, 50 percent of whom qualify for free or reduced-price lunch (Jackson 2019). Within the last three years, numerous staffing positions have been eliminated in Union High School due to budget cuts at the state and district level. Class sizes have increased significantly as a result and the remaining staff members have absorbed the extra work loads (Jackson 2019). The school remains the only high school in the County.

The Project Study Area hosts a vocational education program in partnership with Union County Board of Education. The Earle C. Clements Victory Tech High School program allows students under the age of 21 to earn a high school diploma in addition to acquiring a skilled trade in areas of carpentry, welding, automotive maintenance, and many others.

Union County has three libraries. The main branch is in Morganfield and the other branches are in Sturgis and Uniontown. These libraries provide educational programming for children ages 6 months to 5 years in addition to a suite of online educational resources for teens and young adults.

In Union County, approximately 87 percent of the population 25 years and over have a high school diploma or higher and approximately 11 percent have a bachelor's degree or higher (USCB ACS 2014-2018: 5-Year Estimate, Educational Attainment). In Breckinridge Center CDP, around 80 percent of the population 25 years and over possess a high school diploma with none possessing a bachelor's degree.

### **Health Services**

Methodist Health Hospital is a Critical Access Hospital located in Morganfield just nine miles southwest of the Job Corps Center. The hospital is a 25-bed facility with approximately 140 employees. Besides a 24-hour emergency room service, an ambulance service the facility offers ultrasound, mammography, surgical services, spiral CT scanning, physical therapy, cardiopulmonary, and laboratory testing (Methodist Health 2019). In 2018, Methodist Health formed an affiliation with the Deaconess Health System, a healthcare provider to 26 counties in the states of Indiana, Illinois, and Kentucky (Deaconess Health System 2019). A separate Methodist Family Practice facility is located approximately six miles west of the Job Corps Center.

The Wellness Center within the Earle C. Clements Job Corps Center provides basic medical, dental, optometry, and mental health services to the students at no cost (DOL 2017a). All services are provided within the Medical/Dental Building 1505, a 17,500 square feet building located just south of Road W3 and Headquarters Road (DOL 2017a).

### **Law Enforcement**

The Union County Sheriff's Office is the law enforcement entity within the County. It is located on 100 W Main Street. The Union County Sheriff's Office handles traffic violations and criminal complaints as well as provide general patrolling, court security and process documentation services (Union County 2019b). The Earle C. Clements Job Corps Center has security on campus operating at a 24/7 capacity (DOL 2017a).

### **Fire Protection**

Union County has four fire departments, the closest one to the Job Corps Center being Whispering Meadows Fire and Rescue. Located on 60 Road 6 within the Breckinridge Center CDP and just outside of the Job Corps Center, Whispering Meadows has 32 personnel on staff: 24 volunteer firefighters in addition to 8 volunteer non-firefighting personnel (USFireDept 2019).

The Earle C. Clements Job Corps Center has a 3000 square feet firehouse on campus. Located west of the intersection of Road B and Main Entrance Road, the firehouse, along with its storage space, is designated as building number 1415 and 1415-A respectively (DOL 2017a). Most of the buildings on campus are equipped with individualized fire alarm systems although some

dormitories, like the series 500 dorms, lack fire protection. A facility report conducted in 2017 reported an adequate number of fire hydrants on Job Corps Center property.

## **Recreation**

The Caseyville Boat Dock and Recreation Area, located within Union County, offers boating, fishing, and recreational opportunities along the Ohio River. It is located approximately 20 miles from the Job Corps Site (Union County 2019c).

Recreational facilities within the Earle C. Clements Job Corps Center are grouped around an extensive open zone which includes a baseball field and a soccer field. These are the Field House Building 1511, Fitness Center Building 1512, Swimming Pool Building 1512A, Bowling Building 1507, Hobby Shop and Library Building 1521, Recreation Building 1513, Jackie Robinson Recreation Center 1514, Recreation Building 1515, and Student Union Building 2435. Other facilities include a golf driving range and roller skating facility near the dormitory area (DOL 2017a).

### **5.6.1.5 Environmental Justice**

On February 11, 1994, President Clinton issued EO 12898, *Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*. The purpose of this EO is to avoid the disproportionate placement of adverse environmental, economic, social, or health impacts from federal actions and policies on minority and low-income populations or communities.

For environmental justice considerations, these populations are defined as individuals or groups of individuals subject to actual or potential health, economic, or environmental threats arising from existing or proposed federal actions and policies. Low-income, i.e., at or below the poverty threshold, is defined as the aggregate annual mean income for a family of four. In 2019, this mean income was \$26,370, up from \$24,230 in 2014 (USCB 2020). Table 15 summarizes minority and low-income populations for the area.

Data from USCB shows that the Breckinridge Center CDP, where the Job Corps Center is situated, has more than triple the percentage of individuals below the poverty level at 69.3 percent compared to the Union County value of 22.2 percent (USCB ACS 2014-2018: 5-Year Estimate, Poverty Status in the Past 12 Months). The MES reported in its 2019-20 Comprehensive School Improvement Plan that 12 percent of Union County children live in deep poverty and 77 percent of all Union County children live in a high-poverty area. Deep poverty is defined nationally as a family living on less than 50 percent of the federal poverty level (Stanley 2020). Level of poverty at the county level remains substantially higher than those of the state and country.

### **5.6.1.6 Protection of Children**

On April 21, 1997, President Clinton issued EO 13045, Protection of Children from Environmental Health Risks and Safety Risks. This EO recognizes that a growing body of scientific knowledge demonstrates that children may suffer disproportionately from environmental health risks and safety risks.

DOL intends to fully comply with EO 13045 by incorporating these concerns in decision-making processes supporting DOL policies, programs, projects, and activities. In the current environment, there are residences nearby the Job Corps Center where children live along with churches and schools. In this regard, the DOL ensures that it would identify, disclose, and respond to potential adverse social and environmental impacts on children within the area affected by a proposed DOL action.

**Table 15. Minority and Low-Income Populations: Local/Regional Project Study Area and Larger Regions, 2018**

Jurisdiction	Total Population	Percent White	Percent Black or African American	Percent American Indian and Alaskan Native	Percent Asian	Percent Native Hawaiian or Other Pacific Islander	Percent Some Other Race	Percent Ethnicity Hispanic/Latino	Percent of Individuals Below Poverty Level
<b>Breckinridge Center, CDP</b>	2,363	45.2	42.0	0.0	1.9	0.0	0.0	6.6	69.3
<b>Union County</b>	14,802	83.3	12.9	0	0.6	0	0.3	1.9	22.2
<b>State of Kentucky</b>	4,440,204	87.1	8.0	0.2	1.4	0.1	1.2	3.6	17.9
<b>United States</b>	321,004,407	73.0	12.7	0.8	5.4	0.2	4.8	17.6	13.1
Source: US Department of Commerce, U.S. Census Bureau, 2014-2018 American Community Survey 5-Year Estimates, Selected Economic Characteristics (USCB ACS 2014-2018)									

## 5.6.2 Environmental Consequences

In this section the potential impacts to socioeconomic resources that could result from no action and implementation of the proposed action are described.

### 5.6.2.1 No Action Alternative

The No Action Alternative would have no impacts on economic development, population demographics, housing, community services, and environmental justice because there would be no change from existing conditions. Under this alternative, the existing/baseline conditions would continue at the Clements property. DOL would continue to own and maintain the 894.88 acres of the Earle C. Clements Job Corps Center and would not be able to reduce operating and maintenance costs, and there would be benefits foregone from the delayed reuse of the excess property.

## **5.6.2.2 Proposed Action Alternative**

### **Economic Development**

Under the reuse alternative, the economy of Union County would experience a short-term beneficial impact from employment generated by construction activities. Employment generation would extend to temporary and permanent jobs resulting in wages paid, services and materials purchased, and sales rendered.

Construction of 50 acres of residential single-family homes on Tract 1 would generate moderate short- and long-term beneficial economic impacts. Local workers would have temporary employment during the construction phase. After completion of construction, real estate agents and brokers would also benefit from the new housing stock made available by the residential reuse of the site.

Construction of industrial facilities along the northern portion of Tract 2 would also have a short-term, positive impact from employment of local labor as well as subcontractors during the construction phase. Union County will benefit from the property taxes collected from the reuse.

### **Population Demographics**

The proposed action would have a negligible to minor impact on demographics of the local project study area and of Union County depending on the rate of development and if the new development is enough to attract more people to the area. Post-development, the single-family housing structures could potentially attract homebuyers to Breckinridge Center CDP, thereby increasing the long-term population. Additionally, I-1 Light Industrial zoned area of Tract 2, located near existing industrial uses, would generate long-term employment, potentially drawing workers to the area. Conversion of portions of Tract 1 and 2 into A-1 Agricultural would further increase the number of individuals employed in agriculture work locally and regionally. Changes to demographics in the long-term would be minimal.

### **Housing**

The reuse alternative would provide beneficial impacts to the local and countywide housing stock through the creation of as many as 200 additional single-family homes (SFH) on 11,000 SF lots. This addition would make up around 48% of local housing stock values from 2018 which was estimated at 417 units.

Considering the local percentage of vacant homes in Breckinridge Center CDP is 38.8 percent in 2018, there could be a low demand for housing within the area. However, it is worth noting that the additional 200 SFH on 11,000 SF lots reflect a maximum residential reuse condition for the 50 acres of land. A lower number of homes could be constructed on much larger lots within the area. The construction of new units would likely be spread over a period of time anywhere from months to years depending on how quickly the lots are sold and developed.

The population of Breckinridge Center CDP increased by 7 percent from 2014 to 2018. Spreading out development in accordance with the gradual growth trend would result in sustainable development that meets market demands. Given all these factors, increasing the

housing stock of Breckinridge Center CDP would have a negligible impact to local housing values and the physical built environment as well as social aspects of communities in the area.

In 2018, the median rent for renter-occupied housing in Breckinridge CDP was higher than the median rent in Union County despite median household income in Breckinridge CDP being lower than the median income for the County. Depending on the consumer price or gross rent of the new housing the reuse could have a range of effects. For example, if home prices or gross rent of the new development are comparable to the current median home value and median gross rent (Table 13), there would be a greater percent of the population that could benefit from the redevelopment.

### **Community Services**

There is a potential for minor impacts to public services (i.e. police, fire, hospital, and education services). The construction of new residential housing would result in moves within Union County to Breckinridge CDP. Increase in school class sizes is anticipated for Morganfield Elementary, Union County Middle and High Schools, the latter of which reported increase student to teacher ratio within the past three years due to state and district budget cuts. In addition, an increase in local population may require the fire or law enforcement to redistribute resources and potentially increase current staffing levels.

### **Environmental Justice**

The proposed action would not negatively affect low-income or minority families with respect to health, transportation, planned development, or employment. No families, whether or not included in these socioeconomic groups, would be relocated as a result of the proposed action. There would be negligible short-term adverse impacts to the local population, which includes low-income and minority individuals, during the construction and reuse of the site. There may be additional noise, traffic, and dust during the construction. Construction standards would be in place to minimize impacts. It is not anticipated that impacts would be any greater or more severe on minorities or individuals below the poverty line than non-minorities and those above the poverty line.

There would be minor to moderate long-term impacts to local populations, which includes minority and low-income individuals from the reuse as a residential development. Because Clements's poverty rate is much higher than the national average, if home prices or gross rent of the new development are comparable to the current median home value and median gross rent (Table 14), there would be a greater percent of the population that could benefit from the redevelopment. Any impacts would not disproportionately impact low-income or minority populations to any greater degree or extent than non-minority individuals and those above the poverty line. Therefore, the proposed action would meet requirements of EO 12898.

### **Protection of Children**

There are no anticipated impacts to the safety of children during the construction phase of the project. Appropriate Federal and state safety measures and health regulations would be followed to protect the health and safety of all residents as well as workers. Safety measures, barriers, and

“no trespassing” signs would be placed around the perimeter of construction sites to deter children from playing in these areas, and construction vehicles and equipment would be secured when not in use. The reuse as a combination of agricultural use, industrial use, and residential development would have no impact on the safety of children. Therefore, the proposed action would meet the requirements of EO 13045.

## **5.7 TRANSPORTATION**

### **5.7.1 Affected Environment**

This section describes the existing transportation conditions at and surrounding the Earle C. Clements Job Corps Center. Roadways and traffic are discussed first, followed by public transportation.

#### **5.7.1.1 Roadways and Traffic**

The residents of Earle C. Clements Job Corps Center are served by federal, state, and local roadways. U.S. 60, a two-lane federal highway which passes through the northern portion of the Job Corps property and intersects with U.S. 60 Bypass and State Highway 56 in the City of Morganfield. It has an average annual daily traffic (AADT) of around 7009 (Kentucky Transportation Cabinet [KYTC] 2020a). State Highway 56 has an AADT of 1488 and continues southeast, becoming the West Main Street within the City of Morganfield. Further east, the highway bisects State Route 2091 intersects State Route 2835 beginning at Ben Harris Road; the AADT for the former is 1311 and 683 for the latter (KYTC 2020a). There are no designated bike trails within Union County at this time.

The Earle C. Clements Job Corps Center is bounded by U.S. Route 60 to the north, Industrial Road to the east, Meadows Road to the south, and State Route 2091 to the west. Camp Breckinridge Road is the main access road for traffic entering the main gate of the Job Corp Center from U.S. Route 60 (DOL 2017a). The road is also referred to as Whitaker Way and Main Entrance Road. No traffic data was available for this portion of Camp Breckinridge Road. All roads are available for vehicular traffic and are frequently crossed by students walking to various campus facilities.

Tract 1 is accessible from U.S. 60 via State Route 2091 to the southwest as well as Whitaker Way to the northeast. Local connector roads include Heriges Lane, Village Square Road, N Village Square Road, and Bluegrass Road.

Tract 2 is accessible from U.S. 60 via Popcorn Road to the west and Industrial Road to the east. Local connector roads within the tract include Roosevelt Road, Road A, Road C, and Meadows Road.

#### **5.7.1.2 Public Transportation**

Union County lacks a public transportation system. The presence of bus stops and established bus routes are absent within the County. Union County Public Schools (UCPS) Transportation Department provides bus services to transport students to school, home, and extracurricular activities. The buses operate within the Morganfield School District (UCPS 2019).

## **5.7.2 Environmental Consequences**

In this section, the potential impacts to transportation that could result from no action alternative and implementation of the proposed action alternative are described.

### **5.7.2.1 No Action Alternative**

No changes to the existing baseline conditions for transportation resources are anticipated.

### **5.7.2.2 Proposed Action Alternative**

Short term impacts to transportation would occur during construction phase. Temporary increase in vehicular traffic within surrounding U.S. 60 and other roadways both state and local roadways is anticipated. There would be more trucks and heavy equipment traffic delivering supplies and commuting construction workers.

Reuse of the Earle C. Clements Job Corps Center would result in negligible to minor impacts to transportation patterns in the area, the majority of which will most likely be on state roadways and Highway U.S. 60. State Route 2091, in addition to N Village Square Road and Whitaker Way, will be the main connector roads between future reuse on Tract 1 and Highway U.S. 60. Popcorn Road and Industrial Road are local roads that would connect reuses on Tract 2 to Highway U.S. 60.

Following the transfer of Tracts 1 and 2 to the receiving entity, portions of Roads A, B, and C in addition the respective off branching roads, may become public-access roads. Whitaker Way-Camp Breckinridge Road will continue to serve as the main entrance road to the remaining Job Corps Center property.

In the long-term, construction of the new housing units could result in an increase of a maximum of 200 households in the neighborhood with the potential to increase traffic in the area. Residential development, in the range of maximum density allowed under local zoning guidelines would generate about 974 to 1,865 trip ends per day (Institute of Transportation Engineers [ITE] 2018). There may be slightly higher traffic volume around peak work/commute times in and out of the property. Because the location of the property and the roads are outside the city center, it is anticipated that the number of trips would be in the mid-range of trip end estimates. Because residential development could take years to be fully developed and occupied, the roads adjacent to and near the excess property would be able to accommodate the gradual increase in traffic. There is adequate street parking for the potential increase in cars though some of the larger residential lots would be able to accommodate driveways or parking pads for off-street parking. Impacts would be negligible to minor depending on the final number of residential units constructed and number of additional vehicles per household.

Conversion of 205.29 acres of Tract 1 to agricultural use would have a negligible impact on traffic in the area with a slight increase in slow moving farming equipment, such as tractors and combines, moving along the local access roads. Access to agricultural use areas in Tract 1 would be provided by State Route 2091, Heriges Lane, and Road A (Marshall Road).

The development of the 160-acre industrial area in Tract 2 would result in the construction of driveways and entrances off Flourney Road, Roosevelt Road, and Road A (Marshall Road).

Construction activities would increase traffic volumes in the short-term. In order to closely emulate the site conditions of the industrial site under the Proposed Action Alternative, Beacon geospatial database was used to analyze eleven (11) neighboring parcels for metrics such as total area, building footprint, and parking area (Schneider Geospatial 2020). Trip end calculations for the 160-acre industrial area of Tract 2 were based on a maximum condition under County land use regulations. The maximum development of 160-acre (6,969,600 SF) site with an estimated footprint of 975,700 SF would generate between 1,028 to 4,432 trip ends per day (ITE 2018). Slightly higher traffic volume is anticipated around peak work/commute times. However, industrial areas like the 160-acre site could take years to be fully developed and occupied; the adjacent Morganfield Industrial Park has been active for decades, yet roughly half the tracts within its boundary are vacant (KYCED 2017). Any increase in vehicle trips generation on roads adjacent and near the 160-acre property will be gradual. While the property will adequately accommodate 2,439 parking spaces under the maximum condition, the addition of off-street parking will follow anticipated piece meal development trends of the property. Impacts will therefore be minor based on the final number of industrial facilities that will occupy the property.

Conversion of 103.86 acres of Tract 2 to agricultural use would have a negligible to minor impact on traffic in the area with a slight increase in slow moving farming equipment, such as tractors and combines, moving along the local access roads. Access to agricultural use areas in Tract 2 would be provided by existing roads including Industrial Road, Popcorn Road, Road A (Marshall Road), and Road C.

## **5.8 CUMULATIVE IMPACTS**

A cumulative impact analysis evaluates the incremental effects of implementing the Proposed Action Alternative when added to past, present, and reasonably foreseeable future DOL or other actions at the Earle C. Clements Job Corp Center and the actions of other parties in the surrounding area, where applicable. A five-year planning horizon was used for this assessment (five years into the past and five years into the future).

### **5.8.1 Actions at the Earle C. Clements Job Corps Center property**

Within the past five years, the operator has completed and began current maintenance, repair, and minor renovation projects on the Earle C. Clements Job Corp Center campus. These projects have included:

#### **Completed Projects**

- Removal of Buildings 2432-A, 2433, 2434 & 2433-A
- Repair of HVAC in the Dining Halls

#### **Current Projects**

- Address site lighting deficiencies
- Correct flooding issues around Buildings 501 and 502
- Install new generator for Dining Hall (Building 702)
- Repair roofing in the Swimming Pool Building (Building 1512-A); this project was suspended after the roof collapsed during construction activities

Reasonably foreseeable future actions that may occur at the Center include the following construction, repair, renovation, and replacement projects funded or recommended as of the most recent Facility Planning Report (DOL 2017a):

- Establish a long-range planning vision of an optimal Earle C. Clements Job Corps Center
- Address repairs to aging 300, 400, and 500 series dormitories with particular focus on 400 series dormitories which continue to have window and roof failures
- Provide roofing replacement and electrical improvements to Building 702
- Construct centralized cafeteria and cold storage facility
- Address deteriorating recreation facilities
- Construct a new Welcome Center to provide visitor, vendor, and new student processing and screening at the main entry point
- Upgrade and expand existing Medical/Dental Building (Building 1505); address energy efficiency and water infiltration issues caused by the building being located in a site depression
- Move Facility Maintenance to vacated Building 701 and relocate Logistics to Building 2447
- Demolish all other 2400 series buildings

### **5.8.2 Actions by Others in the Surrounding Area**

The Earle C. Clements Job Corps Center is adjacent to the Morganfield Industrial Park (Site 225-001), a 151.7-acre site consisting of thirteen (13) tracts ranging from 5.5 to 25.2 acres (KYCED 2017). The industrial park is connected to U.S. Route 60 via Convoy/Flourney Road, Industrial Road, and County Road E (Highway 2835). A cross-reference analysis between the Morganfield Industrial Park map and Union County property tax record database provided by Schneider Geospatial (Schneider Geospatial 2020) revealed that, at the time of writing, approximately 36.16 acres are privately-owned. The number of businesses occupying the Morganfield Industrial Park is anticipated to increase in the coming years. Construction activity from land grading to the creation of parking lots and facilities are likewise anticipated to align with the increase in privately-owned acres.

The Kentucky Transportation Cabinet (KYTC) is the entity that plans and manages roadway and transportation infrastructure projects in the state of Kentucky. The Job Corps Center is located within Highway District 2. An analysis of the KYTC Recommended Highway Plan for FY 2020-2026 revealed there are two transportation infrastructure projects around Job Corps Center area planned within this timeframe (KYTC 2020b). These projects were cross-referenced and confirmed on the KYTC Active Highway Plan mapper (KYTC 2020c).

These projects include:

- Minor road widening on KY-56 – from mile point (MP) 2.723 to 7.182; FY 2021-2023 – Right of Way and Construction
- Address pavement condition on U.S. 60 – from MP 3.450 to 12.740; FY 2025 – Construction

While these projects are not occurring on roads adjacent to the Job Corps Center, their proximity to the Job Corps Center could impact traffic flows along U.S. 60 due to construction activities.

### **5.8.3 Potential Cumulative Impacts**

#### **5.8.3.1 No Action Alternative**

Recent maintenance, repair, and minor renovation projects conducted at the property did not appear to have resulted in any adverse impacts and led to the beneficial impacts of needed improvements to the facility. All of the potential future projects planned for the facility, including demolition of the 2400 series buildings and construction of a centralized cafeteria facility, are expected to result in beneficial impacts to continued operation of the shelter, while any adverse impacts would likely be negligible or mitigated, pending assessment as part of future NEPA studies, if required.

#### **5.8.3.2 Proposed Action Alternative**

DOL would remove any personal property items including POLs or other chemicals remaining from operation of the Job Corps Center prior to transferring the property to GSA for public sale. Upon sale of the property and prior to building demolition, the purchaser of the property would be responsible for the assessment and management of any hazardous and toxic substances including LBP, ACM, and PCBs within the proposed project area and undertake any necessary abatement or remediation required, under applicable laws and regulations, to achieve reuse requirements. Although it is expected that all buildings would be demolished and LBP, ACM, and PCBs would be abated prior to demolition, as required, any remaining LBP, ACM, and PCBs would not present an unacceptable risk to human health, because the purchaser would covenant and agree that it would not permit the occupancy or use of any buildings or structures on the property as Residential Property. All applicable federal, state, and local laws and regulations pertaining to LBP, ACM, and PCBs and/or LBP, ACM, and PCB hazards would be followed.

For the remaining USTs, federal facilities are subject to closure requirements and if contamination is present, remediation may be required to prevent harmful exposures subsequent to transfer (Congressional Research Service 2014). There are a variety of available remediation technologies. Any remediation would meet state and federal regulations; therefore, no significant impacts are expected.

The Proposed Action Alternative, in combination with other past, present, and reasonably foreseeable future activities, would have no significant cumulative impacts to hazardous and toxic substances,

Potential land use changes for new residential units, and agricultural lands in Tract 1 and new industrial facilities and agricultural lands in Tract 2 may occur under this alternative. These land use changes are compatible with surrounding land uses and the zoning ordinance of Union County. These changes combined with other past, present, and reasonably foreseeable future activities, such as redevelopment efforts in other portions of the Earl C. Clements Job Corps Center, would result in no significant impacts to land use.

Socioeconomic effects from the proposed reuse include employment generation; wages paid; an increase in sales (business) volume; and expenditures for local and regional services, materials, and supplies. The City of Morganfield will benefit from having an industrial use adjacent to its

industrial park. Union County will benefit from the increase tax revenue generated by additional agricultural lands, industrial facilities, and residential units. These beneficial impacts combined with the employment and economic opportunities of future development that is expected throughout the region would have no significant short- and long-term beneficial cumulative impacts to the local and regional community.

The Proposed Action Alternative would temporarily increase traffic volume on U.S. Route 60 and adjacent roads due to construction vehicles carrying workers, equipment, and materials to the site. In the long term, the presence of additional housing in portions of Tract 1 and additional industrial facilities in Tract 2 may increase traffic volume traveling to and from the property. Traffic volumes would be variable throughout the day and may increase during peak commuting times. The portion of Tract 2 to be zoned for industrial use would increase volumes on nearby U.S. Route 60. This, in combination with traffic volumes from other past, present, and reasonably foreseeable future activities, would have negligible to minor cumulative impacts to the transportation environment.

## **5.9 MITIGATION MEASURES OR BEST MANAGEMENT PRACTICES**

The no action alternative would not require implementation of any mitigation measures because there would be no change to existing conditions in the portion of the Earle C. Clements Job Corps Center proposed for disposal and potential reuse. This alternative includes the continued operation and limited use of the property with only minor routine maintenance activities, as needed. Implementation of the proposed action alternative, however, would incorporate measures to mitigate environmental impacts during construction and operation of the area proposed for redevelopment, as follows:

- Prior to the commencement of any demolition, site preparation, or construction activities, a silt fence or other suitable control device would be placed between the construction area and any potentially affected waterway or drainage area. The barrier would be maintained in a functioning capacity until the area is permanently stabilized upon project completion. Other erosion control measures to minimize indirect impacts to aquatic resources may include staked straw bales, brush barriers, sediment basins, and diversion ditches. Storm water management measures onsite would slow onsite and offsite sheet flow.
- Runoff from construction areas would be collected and stored in an approved and permitted storm water collection system prior to discharge.
- Once initiated, project construction would be carried out in an expeditious manner to minimize the period of disturbance to the environment.
- If necessary, water sprayers would be used during dry weather to minimize fugitive dust.
- During demolition, site preparation, and construction all necessary measures would be taken to prevent oil, tar, trash, debris, and other pollutants from entering adjacent waterways. Work areas would be cleaned on a daily basis, and onsite trash containers would remain closed, except when adding or removing trash.
- Project activities would utilize available opportunities for segregation and recycling of waste material.

- All hazardous materials such as lead-based paint (LBP), asbestos-containing materials (ACM), or polychlorinated biphenyl (PCB)-containing materials would be properly handled, removed, and disposed in accordance with regulatory requirements.
- In the unlikely event of inadvertent discovery of artifacts or archaeological features during project activities, work would cease, and the Kentucky SHPO would be consulted immediately.
- Prior to the commencement of any project activities that require tree removal, the new owner would initiate consultation with the USFWS and other state agencies, as required, under Section 7 of the Endangered Species Act to identify and protect summer habitat of threatened or endangered bat species. Tree removal may be subject to seasonal timing restrictions, as determined in consultation with those agencies.

In combination, these practices are designed to prevent or reduce environmental impacts on the proposed project site and surrounding area.

## **6.0 FINDINGS AND CONCLUSIONS**

This Environmental Assessment was conducted in accordance with the requirements of NEPA, the CFR regulations implementing NEPA (40 CFR 1500), and the DOL NEPA Compliance Procedures (29 CFR §11). As analyzed and discussed in this EA, direct, indirect, and cumulative impacts of the proposed action alternative for disposal and reuse of excess property associated with the Earle C. Clements Job Corps Center have been considered and no significant impacts were identified. Therefore, issuance of a Finding of No Significant Impact is warranted, and preparation of an Environmental Impact Statement is not required.

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## **7.0 AGENCY CONSULTATION AND PUBLIC NOTICE**

The DOL contacted federal and state agencies and three federally-recognized Native American tribes regarding the proposed action. The letters and agency responses are presented in Appendix A. The following agencies were consulted:

- Kentucky State Historic Preservation Office (SHPO)
- U.S. Fish & Wildlife Service (USFWS)
- Eastern Band of the Cherokee Indians
- Shawnee Tribe
- Chickasaw Nation

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## **8.0 PREPARERS OF THIS ENVIRONMENTAL ASSESSMENT**

The Engineering Support Contractor (ESC) prepared this EA under Contract DOL 121A21848 for the DOL Job Corps program. The ESC's Parsons environmental specialists who prepared this document are listed as follows:

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**APPENDIX A  
AGENCY AND TRIBAL COMMENT SOLICITATION LETTERS**

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