ENVIRONMENTAL ASSESSMENT

JULY 2022

GARY JOB CORPS CENTER
PROPOSED DISPOSAL AND REUSE
SAN MARCOS, TEXAS

Prepared for:

DEPARTMENT OF LABOR

Office of Job Corps

Division of Facilities and Asset Management

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TABLE OF CONTENTS

1.0 EXECUTIVE SUMMARY 1-1
1.1 Conclusions 1-3

2.0 INTRODUCTION 2-1

3.0 PURPOSE AND NEED FOR ACTION 3-1
3.1 Project Location 3-1
3.2 Background 3-1
3.3 Project Purpose 3-6
3.4 Project Need 3-6

4.0 ALTERNATIVES 4-1
4.1 No Action Alternative 4-1
4.2 Proposed Action Alternative 4-1

5.0 THE AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES 5-1
5.1 Impact Analysis Methods 5-1
5.2 Impact Topics Analyzed 5-1
5.3 Cultural Resources 5-9
5.4 Hazardous and Toxic Substances 5-13
5.5 Socioeconomic Environment 5-16
5.6 Cumulative Impacts 5-24
5.7 Mitigation Measures or Best Management Practices 5-26

6.0 FINDINGS AND CONCLUSIONS 6-1

7.0 AGENCY CONSULTATION 7-1

8.0 PREPARERS OF THIS ENVIRONMENTAL ASSESSMENT 8-1

9.0 REFERENCES 9-1

APPENDIX A. AGENCY COMMENT SOLICATION LETTERS A-1

LIST OF TABLES

Table 1. Summary of Impact Analysis for the No Action and Proposed Action Alternatives 1-2
Table 2. Gary Job Corps Center Tract Information 3-1
Table 3. Federally Listed Species near the Gary Job Corps Center 5-4
Table 4. Housing Characteristics, Gary Job Corps Center Region, 2019 5-19
Table 5. Single-family Homes Listed for Sale, City of San Marcos 5-20

Table 6. Minority and Low-Income Populations: Region and Larger Regions, 2018.....5-22

LIST OF FIGURES

Figure 1. Regional Project Area.....3-2
Figure 2. Project Area Vicinity.....3-3
Figure 3. Gary Job Corps Center Existing Site Plan.....3-7
Figure 4. Area of Potential Effects (APE), Gary Job Corps Center.....5-10
Figure 5. Former San Marcos Municipal Landfill Boundaries and Tracts IV and V 5-15

LIST OF ACRONYMS AND ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation
ACS	American Community Survey
ACT	Advanced Career Training
AFB	Air Force Base
ALERRT	Advanced Law Enforcement Rapid Response Training
APE	Area of Potential Effects
BFE	Base Flood Elevation
BLS	Bureau of Labor Statistics
BMP	Best Management Practice
C	Commercial (Zoning)
CAPCOG	Capital Area Council of Governments
Cd	Cadmium
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CH4	Methane
CISD	Consolidated Independent School District
CO2	Carbon monoxide
CT	Census Tract
dB	Decibel
DOL	U.S. Department of Labor
EA	Environmental Assessment
EO	Executive Order
ESC	Engineering Support Contractor
ETJ	Extra-Territorial Jurisdictions
Fe	Iron
FE	Federally Endangered
FEMA	Federal Emergency Management Agency
FM	Farm-to-Market
FONSI	Finding of No Significant Impact
FUDS	Formally Used Defense Site
FT	Federally Threatened
GHG	Greenhouse Gas
GSA	General Services Administration

HTRW	Hazardous, Toxic, and/or Radioactive Waste
HUD	U.S. Department of Housing and Urban Development
HVAC	Heating, Ventilation, and Air Conditioning
ID	Identification
IPaC	Information, Planning, and Conservation
IPCC	Intergovernmental Panel on Climate Change
Mn	Manganese
NAAQS	National Ambient Air Quality Standards
NCADAC	National Climate Assessment and Development Advisory Committee
NEPA	National Environmental Policy Act
NETR	Nationwide Environmental Title Research
NHPA	National Historic Preservation Act
NO2	Nitrogen dioxide
N2O	Nitrous Oxide
NPL	National Priorities List
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
O3	Ozone
OU	Operating Unit
P	Public Institutional District (Zoning)
Pb	Lead
PBC	Public benefit conveyance
PCB	Polychlorinated Biphenyl
PM	Particulate Matter
RCRA	Resource Conservation and Recovery Act
sf	Square foot
SHPO	State Historic Preservation Officer
SMART	San Marcos Air, Rail, and Truck
SOx	Sulfur dioxides
TCEQ	Texas Commission on Environmental Quality
TCU	Transportation Communications Union
TDC	Texas Demographic Center
TEAP	Trainee Employee Assistance Program
THC	Texas Historical Commission
TNRCC	Texas Natural Resource Conservation Commission
TX	Texas

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
USGS	U.S. Geological Survey
UST	Underground Storage Tank
VOCs	Volatile Organic Compounds
WASP	Women Airforce Service Pilots

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 tracts totaling 244.91 acres located east of the San Marcos Regional Airport in San Marcos, Texas through a transfer facilitated by the General Services Administration (GSA) for potential reuse.

The 244.91-acre area is no longer needed to accomplish the DOL mission and has been determined excess to DOL need. 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 facility.

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

The proposed action is the disposal of underutilized excess property adjacent to the San Marcos Regional Airport. 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 Proposed Action Alternative are considered.

Under the No Action Alternative, DOL would not dispose of or otherwise transfer the Gary 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 Proposed Action Alternative, DOL would report a portion of the Gary Job Corps Center to GSA as “excess” property granting GSA the authority to physically assess and appraise the property, and convey or negotiate the sale of the property. Based on the location, the City of San Marcos (San Marcos Regional Airport), the Texas State University San Marcos, and industrial/commercial businesses would be the most likely entities interested in acquiring the tracts for commercial or institutional uses. The property is suitable for commercial or institutional reuse in accordance with zoning restrictions within Caldwell County. Upon acceptance, GSA would act as disposal agent, and under the hypothetical reuse evaluated in this EA, would offer a public sale of the property. The 244.91-acre property would be transferred in “as-is condition” to the buyer(s).

Table 1 summarizes the evaluation of impacts to resources as a result of the alternatives. The evaluation performed for this EA indicates that no significant impacts are expected from the Proposed Action Alternative.

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

Impact Topic (Alphabetical)	No Action Alternative	Proposed Action Alternative
Air Quality	No impact	No impact
Biological and Physical Resources		
Ecologically Critical Areas or Other Unique Natural Resources	Resource not present	Resource not present
Floodplains and Floodways	No impact	Little to no measurable impact
Prime and Unique Agricultural Land	Resource not present	Resource not present
Soils and Geology	No impact	Little to no measurable impact
Surface Water and Hydrology	No impact	Little to no measurable impact
Threatened and Endangered Species and Critical Habitats	Resource not present	Resource not present
Vegetation	No impact	No impact
Wetlands	No impact	Little to no measurable impact
Wildlife	No impact	Little to no measurable impact
Cultural Resources		
Archeological Resources	Resource not present	Resource not present
Historic Buildings	Resource not present	Resource not present
Historic Properties of Religious or Cultural Significance to Native American Tribes	Resource not present	Resource not present
Energy Requirements and Conservation Potential	No impact	No impact
Climate Change	No impact	Little to no measurable impact
Hazardous and Toxic Substances	No impact	No significant impact
Land Use	No impact	No impact
Noise	No impact	Little to no measurable impact
Socioeconomics		
Economic Development	No impact	Little to no measurable impact
Population Demographics	No impact	No impact
Housing	No impact	No impact
Community Services	No impact	No impact
Environmental Justice	No impact	No impact
Indian Trust Resources	No impact	No impact
Protection of Children	Resource not present	Resource not present
Transportation	No impact	Little to no measurable impact
Utilities	No impact	Little to no measurable 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 Alternative. Accordingly, preparation of an Environmental Impact Statement is not required.

2.0 INTRODUCTION

Job Corps is a national residential training and employment program administered by the U.S. Department of Labor (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. The Job Corps was originally established 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 is currently provided for under Title I-C of the Workforce Investment Act, 1998.

The Job Corps' mission is to attract eligible young adults, teach them the skills they need to become employable and independent, and develop careers or prepare them for further education. The Job Corps addresses 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 as well as operations and maintenance. The DOL proposes to dispose of two tracts totaling 244.91 acres located east of the San Marcos Regional Airport in San Marcos, Texas through a transfer facilitated by the General Services Administration (GSA) for potential reuse, for which an EA is required.

This environmental assessment (EA) was conducted in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 et seq.) and the Council of Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] 1500 to 1508).

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.

3.0 PURPOSE AND NEED FOR ACTION

3.1 Project Location

The Gary Job Corps Center property is located in Caldwell County, Texas (TX) at 2800 Airport Highway 21 East, San Marcos, TX 78667 (Caldwell County). The Center is located approximately four miles east of the City of San Marcos which is roughly halfway between Austin and San Antonio. The Gary Job Corps Center is bounded by the San Marcos Regional Airport and William Pettus Road to the north, flat grassland to the east, a railroad and golf course to the south, and Quail Creek Country Club and Airport Highway 21, to the west (Figures 1 and 2) (DOL 2018a). The Gary Job Corps Center consists of five (5) tracts totaling approximately 768 acres (Table 2). The main entrance is from Airport Highway 21 to Arnold Avenue. The project area is located at approximately 29.9° north latitude and 98° west longitude. Elevation of the site is approximately 620 feet above mean sea level (DOL 2018a).

Table 2. Gary Job Corps Center Tract Information

Tract Designation	Function	Acreage	Description
I	Staff Housing	59.993	59 Buildings
II	Main Campus	457.476	108 Buildings; 83 Structures
III	Main Campus Support	5.596	Abandoned Water/Sewer
IV	Open Space	47.951	Former San Marcos Municipal Landfill, Camp Gary
V	Advanced Law Enforcement Rapid Response Training (ALERRT) Center; Open Space	196.959	Former San Marcos Municipal Landfill, Camp Gary
	Total	**767.975**	

Based on Metes and Bounds Survey (American Surveying Company of Austin 1995)

3.2 Background

Gary Job Corps Center is a federally-owned Center that was established in 1964, and is the largest Job Corps Center in the country. The Gary Job Corps Center was operated under a Use Permit until 1971 when it was transferred without reimbursement from the GSA to the DOL (DOL 2018a). DOL is responsible for the repair and maintenance of all buildings, structures and infrastructure at its federally owned campus. Since activation of the property as a Job Corps Center, new buildings, mostly dormitories, were constructed in the 1970s; seven buildings were constructed in the 1980s; 21 buildings were constructed in the 1990s; and seven buildings have been constructed since 2002.

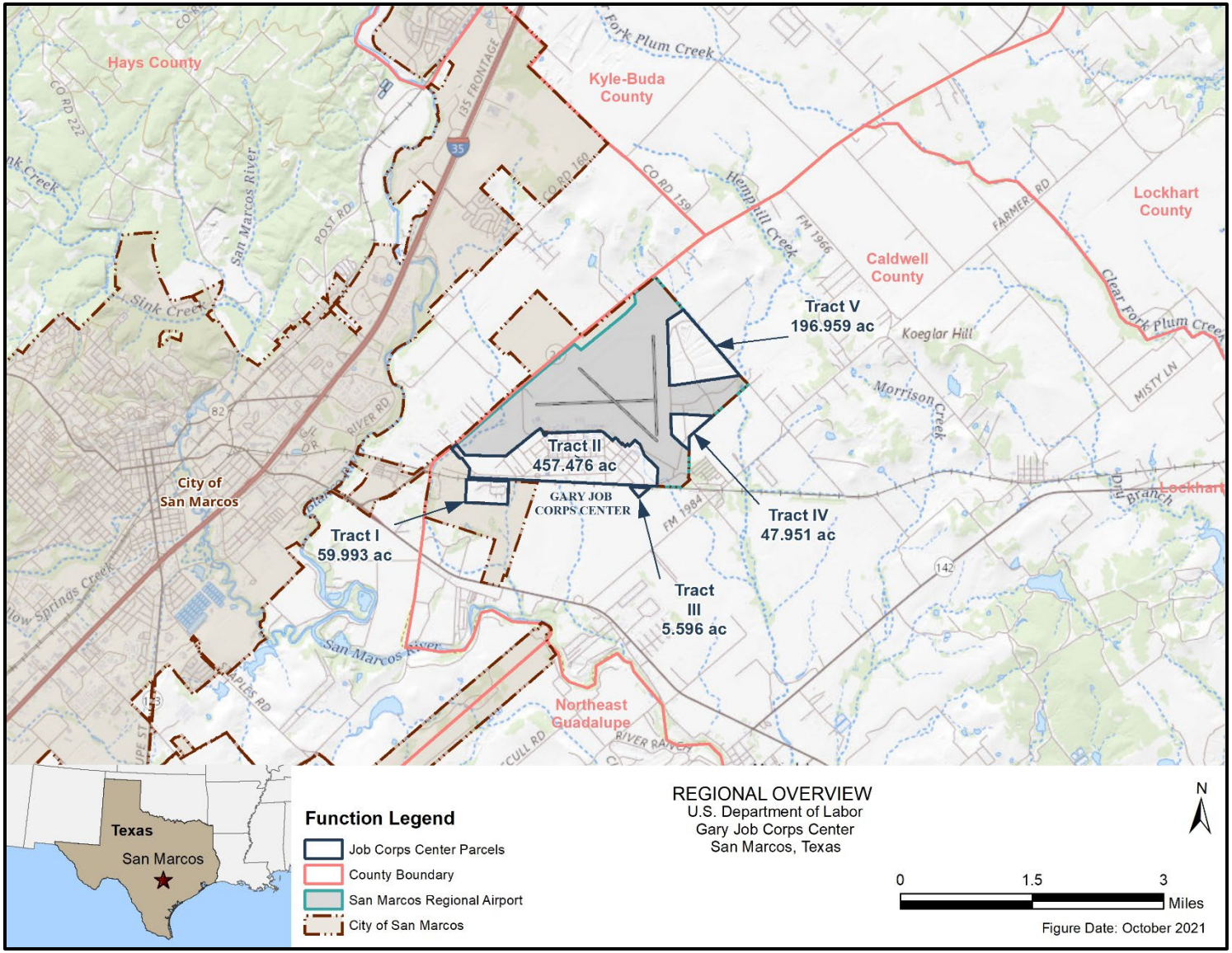

Figure 1. Regional Project Area

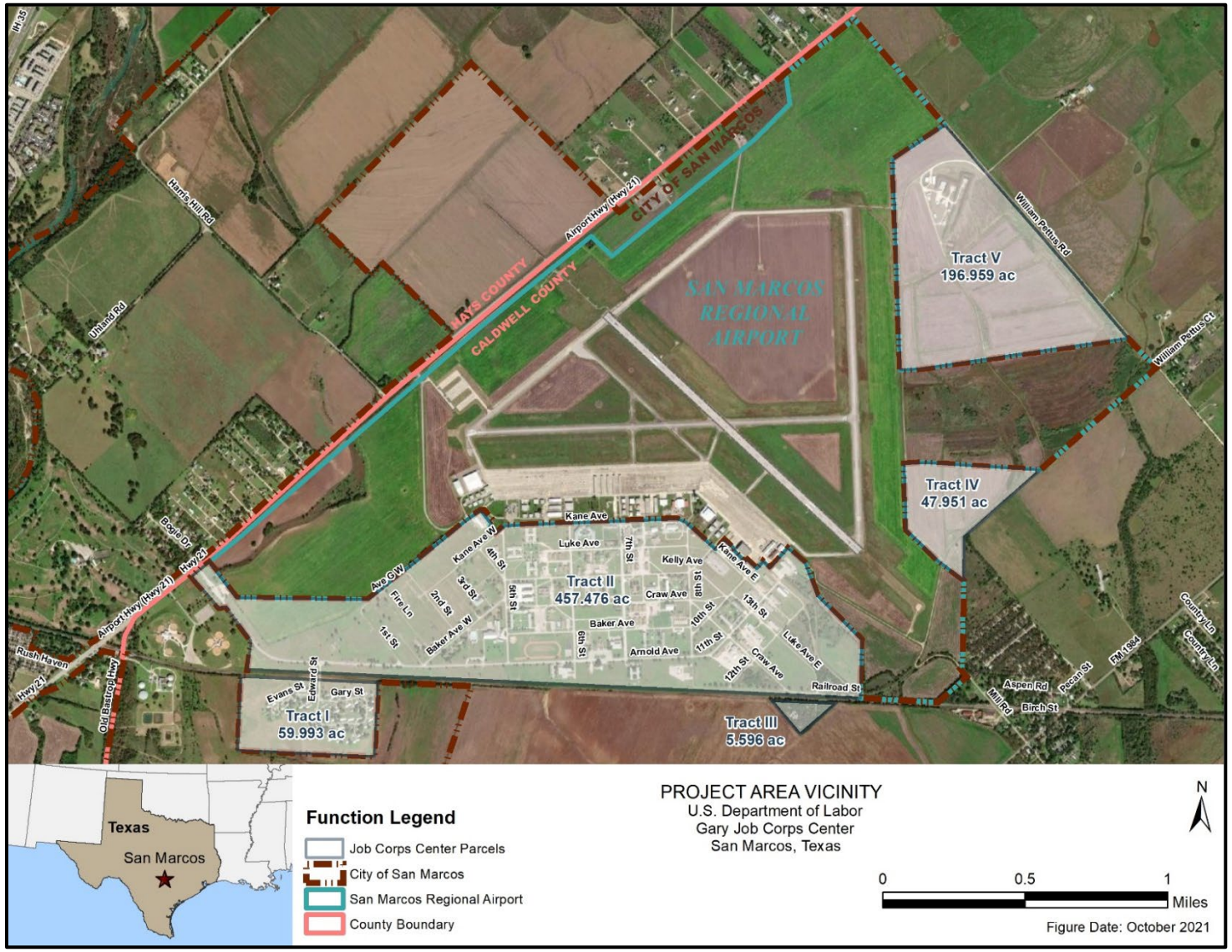

Figure 2. Project Area Vicinity

3.2.1 San Marcos Army Air Field (1942-1946)

The San Marcos Army Air Field began with a directive issued by the War Department in May 1942 for site acquisition (Army Air Forces Navigation School 1943). The city of San Marcos raised $100,000 to purchase 500 acres of land, and the federal government arranged for the purchase of another 1,500 acres (Army Air Forces Navigation School 1943; Ratisseau 1976). Construction of buildings, streets, drainage culverts, and other infrastructure began in late June and was supervised by Major U. E. Hubble of the Army Corps of Engineers (Army Air Forces Navigation School 1943). The planned facility consisted of administrative buildings, classrooms, barracks, hangars, runways, mess halls, and various recreation facilities. Initial construction was completed by November 1942 and the San Marcos Army Air Field was officially activated on December 15, 1942 (Army Air Forces Navigation School 1943). It was one of the three largest navigation schools in the United States. The first class of cadets arrived on February 22, 1943 to begin their 18 weeks of intensive training (Army Air Forces Navigation School 1944). On June 24, 1943, less than a year after construction of the field began, the Army Air Forces Navigation School at San Marcos set a record when it graduated its first class of aerial navigators (Army Air Forces Navigation School 1943; Army Air Forces Training Command 1943). The San Marcos Army Air Field was also one of the few locations in Texas where women were trained in flight; otherwise known as Women Airforce Service Pilots or WASPs. By September 1945, when the navigator mission ended, the Army Air Force Technical Training Command had trained nearly 10,000 navigators (Ratisseau 1976). Due to the efforts of Representative Lyndon B. Johnson and Thomas T. Connally, the San Marcos Army Air Field remained open after the navigator mission ended (Ratisseau 1976). In 1946, the mission changed to one of training helicopter pilots.

3.2.2 San Marcos Air Force Base (1947-1953); Gary Air Force Base/Edward Gary Air Force Base (1953-1956)

In 1947, with the establishment of the U.S. Air Force, San Marcos Army Air Field became San Marcos Air Force Base. It was declared inactive in October 1949 (Ratisseau 1976). The facility was reactivated in January 1951, during the Korean War, as the San Marcos Air Force Base (AFB) for use in helicopter and liaison aircraft training (Manning 2005:76; Smith 1961). During this time, Colonel William F. Stewart commanded the base. With twenty-one squadrons assigned to the base and over 4,800 personnel, San Marcos Air Force Base was the largest training operation for Air Force helicopter pilots in the United States at the time (Ratisseau 1976). In 1953, the base was renamed as the Gary AFB for 2nd Lieutenant Arthur Edward Gary, the first Hays County, Texas soldier killed in World War II (Manning 2005: 88). Gary was killed when Japanese bombers attacked Clark Field in the Philippines on December 7, 1941 (Ratisseau 1976). In 1955, the base was redesignated as Edward Gary AFB (Manning 2005:100). The U.S. Air Force discontinued the liaison aircraft training but continued to serve as a helicopter training school for Air Force and Army personnel (Manning 2005:104). In 1956, the U.S. Air Force announced that the Army would resume its own aviation training and the U.S. Air Force helicopter training mission was moved to other bases (Manning 2005: 104;

Tallman 2014). During the U.S. Air Force occupation, an associated landfill was located east of the air field (United States Geological Survey [USGS] 1953).

3.2.3 Camp Gary (1956-1963)

Gary AFB was transferred to the Army in 1956 and became Camp Gary where Army civilian contractors trained pilots of fixed-wing aircraft (Manning 2005:104, 118; Tallman 2014). At the time of its closure in December 1963, the base consisted of 2,282 acres, 750 buildings, 1.7 million square feet of floor space, barracks space for 1,100 men, family housing for 108 families, five runways, and seven taxiways (Ratisseau 1976). During this period, the Army continued to use the landfill east of the air field (USGS 1958). The airfield was decommissioned in 1966. The former Camp Gary airfield and associated flight line buildings and structures were deeded to the City of San Marcos and the remaining majority of the buildings, structures, and open space was allocated for use as the Gary Job Corps Center.

3.2.4 Gary Job Corps Center

The property owned by DOL consists of five parcels or tracts (Table 2) with Tract II being the main campus of the Gary Job Corps Center and the largest at 457.48 acres (Figure 3). Tract I contains the staff housing complex (59.99 acres). Tract III is a 5.6-acre former water treatment facility and Tract IV consists of 47.95 acres used by local farmers. The 196.96-acre Tract V contains the Advanced Law Enforcement Rapid Response Training (ALERRT) Center, a training facility that provides first responders with active shooter response training. The ALERRT Center is located at the northern portion of the tract adjacent to open farmland to the south. Both Tracts IV and V were once a part of the former San Marcos Municipal Landfill, that spanned 353 acres.

The size of the Center, with 1.09 million square feet in 167 buildings (108 on campus, 59 in staff housing) on 768 acres, is the largest Job Corps Center facility in the United States. There are nine soft vocations, the largest is the certified nursing assistant within the health occupation vocation with 240 students. Health occupation vocations are grouped together in a block of seven 7-100 series 1942-era buildings adjacent to 7th Street. The remaining soft vocations are located on the western side of the campus in five more 1942-era buildings. Buildings housing the soft vocations are in relatively good condition, considering their age. There are 9 hard vocations located in 9 buildings, of which 5 are old WWII-era buildings, and four were built in the late 1980s. Most of the hard vocations are located on the eastern part of the site adjacent to, or among, the facility support buildings. Among those in better condition are the Machine Shop Trades Building 10-353 and Overhead Line/Smart Metering Building 7-302, both constructed in 1990. Welding Building 7-160, constructed in 1969, is in good structural condition. The Heating, Ventilation, and Air Conditioning (HVAC) Building 9-361 is in poor condition. Several hard vocation buildings are remotely located on the eastern end of the campus. Several of these buildings present a constant challenge to the staff and students due to their age, general condition, size, and physical location.

The Gary Job Corps Center provides career technical training in several vocational trades including the following:

- Advanced Career Training (ACT) (Off-Center)
- Carpentry
- Cement Masonry
- Criminal Justice
- Electrical
- HVAC
- Machine Trades
- Material Handler
- Certified Medical Assistant
- Medical Office Support
- Certified Nursing Assistant
- Office Administration
- Overhead Line Construction
- Plastering
- Security Services
- Pharmacy Technician
- Residence Counselor Training
- Security Services
- Transportation Communications Union (TCU) Transportation
- Welding

Non-academic functions are spread throughout the Center. Excluding the counseling offices in dormitories, these functions are located in 15 separate buildings. Building conditions vary from good to poor.

3.3 Project Purpose

The primary purpose for the Proposed Action Alternative is the disposal of two tracts totaling 244.91 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 244.91 acres located east of the San Marcos Regional Airport are no longer needed to accomplish the DOL mission and has been determined excess to DOL need. The two tracts are separated from the main campus of the Gary Job Corps Center by the San Marcos Regional Airport. 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.

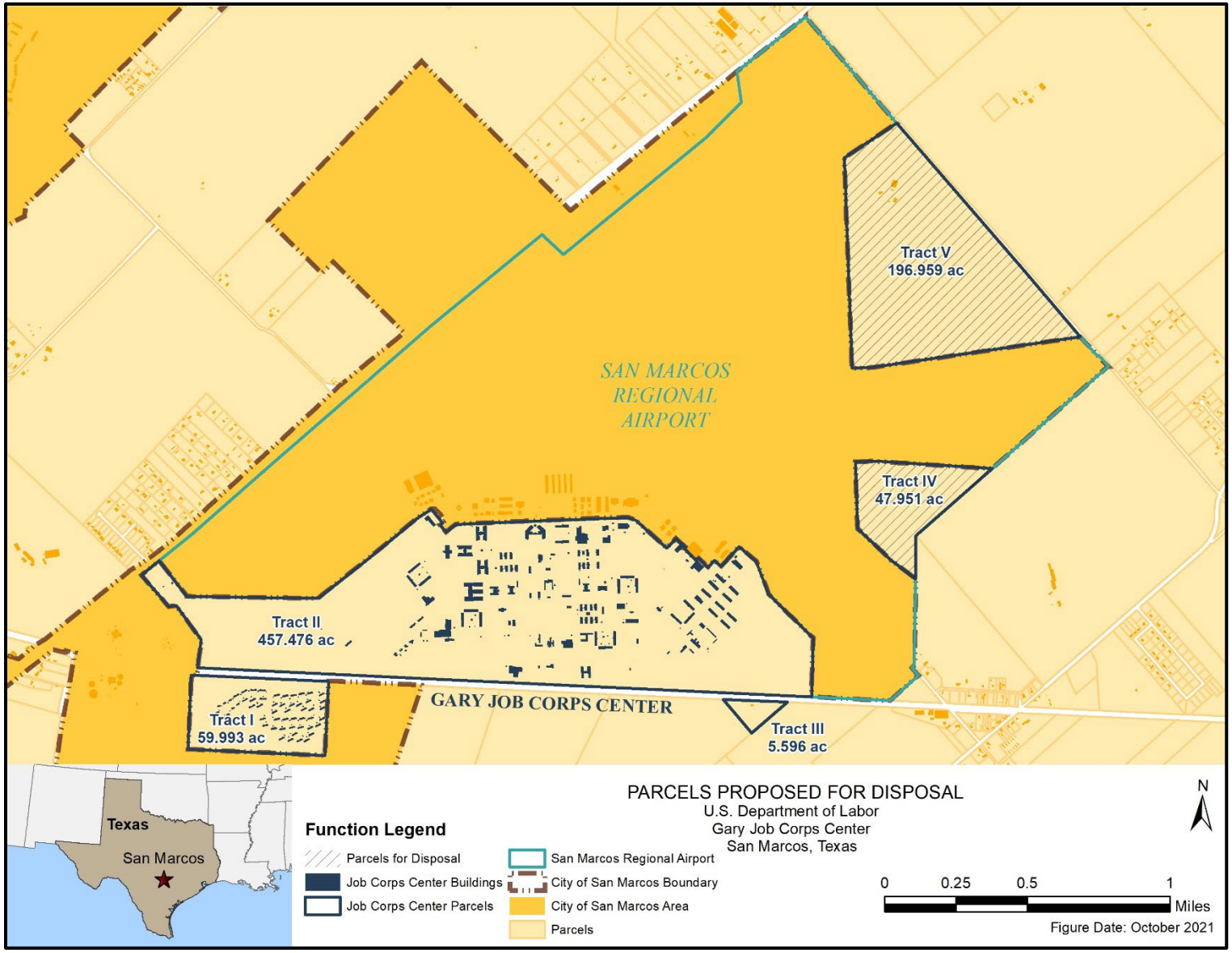

Figure 3. Gary Job Corps Center Existing Site Plan

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 and Proposed Action Alternatives.

4.1 No Action Alternative

Under the No Action Alternative, DOL would not dispose of or otherwise transfer the tracts totaling 244.91 acres located east of the San Marcos Regional Airport. The area would continue to be federally owned as part of the Gary Job Corps Center and the DOL through its contractor, would continue to manage these areas of the Center property. No new construction of buildings or structures would occur in this area. The cost of ownership and property maintenance would remain the responsibility of the DOL.

4.2 Proposed Action Alternative

The proposed action is the disposal of excess property (244.91 acres) located east of the San Marcos Regional Airport. This is an action for which the DOL has responsibility, and both the authority and ability to control. The secondary action is reuse development of the property after ownership is transferred, an action taken by others as a result of DOL's decision to dispose of the property.

Methods available for property disposal include 1) a federal transfer facilitated by the GSA, 2) a public benefit conveyance (PBC) (where state or local government entities may obtain the property at less than fair market value when sponsored by a federal agency (e.g., U.S. 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 Gary Job Corps Center tracts would undergo a series of screenings by GSA to determine the most appropriate or most likely reuse alternatives.

Under the Proposed Action Alternative, DOL would report Tracts IV and V of the Gary Job Corps Center to GSA as "excess" property through completion of Standard Form 118, Report of Excess Real Property, granting GSA the authority to physically assess and appraise the property, and convey or negotiate the sale of the property to another government entity. Upon GSA's acceptance of the Report of Excess Real Property, GSA would become the disposal agent and would handle the disposal process. GSA will conduct their own NEPA analysis for the disposal and reuse, once known.

Caldwell County is guided by the comprehensive planning process for incorporated cities and their extra-territorial jurisdictions (ETJ). Landowners with property outside of the city limits and, in the case of Tract IV, within the ETJ may develop their property without considering compatibility to adjacent properties, as long as the development meets the

subdivision and development requirements for the City and the County (Caldwell County 2013). Tract IV is designated as Commercial (C) according to the Capital Area Council of Governments (CAPCOG) (CAPCOG 2021). Tract V is located within the Public Institutional District (P) within the City of San Marcos which is reserved for properties intended to be used for civic or public institutional purpose or for major public facilities (City of San Marcos 2020: 9:10, 2021a). The City designates allowable development for individual land uses. For the Public/Institutional District, there are several allowable uses including future development and special district usage (e.g., employment center, heavy commercial, light industrial, heavy industrial, and manufactured housing) (City of San Marcos 2020: 4:5, 4:11, 5:6, 2021a). Within the City's Development Code map, the San Marcos Regional Airport is identified as an Employment Center (City of San Marcos 2020: 4:4, 2021a).

Based on the location of the two tracts, the City of San Marcos (San Marcos Regional Airport) may be interested in acquiring portions of the excess property to enhance airport operations at the San Marcos Regional Airport (Keres Consulting, Inc. 2008; GSA 2012; San Marcos Regional Airport 2020). Tracts IV and V are proposed as areas for future cargo activities in the preferred alternative of the Airport Master Plan (San Marcos Regional Airport 2020:47). The corridor along the south side of William Pettus Road, within Tract V has been identified for potential non-aeronautical development, such as industrial/commercial businesses, in the Airport Master Plan (San Marcos Regional Airport 2020:47). Excess property acquired by the City would be maintained as open space and available for future airport expansion.

The Texas State University San Marcos is interested in purchasing portions of Tract V as they manage the existing ALERRT center and are planning construction of a 8,512 square foot (sf) administrative office building on site (Bliefernich 2021). The new administrative office building would accommodate approximately 50 personnel which would be re-located from an existing leased building in San Marcos.

In addition, any future development would be conducted in accordance with Texas Administrative Code, Title 30, Part 1, Chapter 330, Subchapter T, Use of Land over Closed Municipal Solid Waste Landfills (Texas Administrative Code 2006) and in accordance with the Texas Health and Safety Code, Chapter 361, Subchapter R, Use of Land over Municipal Solid Waste Landfills (Texas Health and Safety Code 1989).

The Proposed Action Alternative evaluates a reasonable approach for disposal and reuse of Gary Job Corps Center Tracts IV and V. Although the reuse alternative is hypothetical, it has been established as a basis for evaluating potential impacts from the proposed disposal of the property by DOL.

5.0 THE AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This section provides a description of the existing environmental conditions of the geographic area that could potentially be affected by the No Action or Proposed Action Alternatives. Following each impact topic, a description of the potential environmental impacts that could result from implementation of the Proposed Action Alternative 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 Alternative were submitted to various federal and state agencies to solicit comments regarding any possible impacts of the Proposed Action Alternative. Copies of the agency correspondence letters are presented in Appendix A.

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 potentially affected environment such as society (human, national), the affected region, the affected interests, and the locality. Because of the nature of the proposed project, all impacts may be presumed to be localized unless stated otherwise. Factors contributing to the evaluation of the intensity of an impact are listed in Section 1508.27 of the CEQ's Regulations for Implementing NEPA.

The degree 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

Three impact topics were assessed for potential impacts resulting from the Proposed Action Alternative. These topics include: cultural resources, hazardous and toxic substances, and socioeconomics. Impact topics considered but not further assessed are

described in Section 5.2.1. Table 1 at the beginning of this EA lists each of the impact topics and subtopics and the environmental impact. As noted in the following analysis, none of the potential impacts identified in this EA are significant.

5.2.1 Impact Topics Dismissed

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

Air Quality. The Federal Clean Air Act (42 USC 7401-7671q) requires the U.S. Environmental Protection Agency (USEPA) to establish a series of National Ambient Air Quality Standards (NAAQS) for air quality pollutant levels for the following criteria pollutants: carbon monoxide (CO2), nitrogen dioxide (NO2), ozone (O3), sulfur dioxides (SOx, measured as sulfur dioxide [SO2]), lead (Pb), and particulate matter (PM). Particulate matter was subdivided to matter that is less than 10 micrometers (PM10) in size and matter that is less than 2.5 micrometers (PM2.5) in size. 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. Areas where pollutants were once designated as nonattainment but are now meeting and maintaining the standard are redesignated as a "maintenance area."

During construction of the new ALERRT Center building on Tract V under the Proposed Action Alternative, there would be a negligible increase in air emissions. Emissions would be created from surface grading, 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 Texas.

During operation of the new ALERRT Center building, there would be negligible change in stationary source emissions as there would be one new heating, ventilation, and air conditioning (HVAC) system on site for the new construction on Tract V. The building is approximately 8,512 sf and the addition of a system would result in very little new emissions.

The Proposed Action Alternative would occur within Caldwell County, Texas which is designated as "in attainment" for all USEPA NAAQS criteria pollutants (USEPA 2020). Because the county is in attainment for all NAAQS and the project would occur in a rural area within the much larger Caldwell County, there would be no impact to the county's status in regard to the NAAQS. Further, the project would 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 Gary Job Corps Center tracts are surrounded by a regional airport, and commercial, residential, and agricultural areas. The two tracts were part of the former San Marcos Municipal Landfill. Therefore, no ecologically critical areas occur on or adjacent to the Gary Job Corps Center, and no further analysis is required.

Floodplains and Floodways. Tract V contains a Zone A floodplain which encroaches within the eastern edge of the tract (Federal Emergency Management Agency [FEMA] Flood Insurance Rate Map, Flood Plain Panel: 48055C0100E) (FEMA 2012). Zone A, a FEMA-designated risk premium rate zone, is defined under 44 CFR § 60.3 - Floodplain management criteria for flood-prone areas as an area subject to inundation by the 1-percent-annual-chance flood event. These areas typically lack base flood elevations (BFEs) or flood depths because detailed hydraulic analyses have not been performed (Cornell Law Legal Information Institute 1976). Coordination with the local floodplain administrator would be required prior to any development of the property under the Proposed Action to ensure compliance with local floodplain ordinances. All necessary permitting would be the responsibility of the new property owner. Little to no measurable impacts would occur and this topic was dismissed from further consideration.

Prime and Unique Agricultural Lands. Prime farmland has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops. Unique land is land other than prime farmland used for production of specific high-value food and fiber crops. Both categories require that the land be available for farming uses. Based on the soil types identified in the project area and because the tracts are located in a previously disturbed area (former San Marcos Municipal Landfill), the project area is not considered prime or unique agricultural lands. This resource is not present; consequently, no further analysis is required.

Soils and Geology. The soil underlying the Gary Job Corps Center property, is described on the USDA Web Soil Survey website as comprised predominantly of Branyon Clay at 92 percent with the Houston Black Clay making up the remainder of the soil composition at 7.2 percent (USDA 2021). Branyon soils originate from calcareous clayey alluvium derived from mudstone of Pleistocene age. According to the Geologic Atlas of Texas geologic data, the Gary Job Corps Center is located on Fluviatile terrace deposits which contains gravel, sand, silt, and clay in various proportions with gravel more prominent at higher levels (United State Geological Survey [USGS] 2021). Soils present at the property have been previously disturbed by the former San Marcos Municipal Landfill.

Any future 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, little to no measurable impacts would occur because soils have been previously disturbed and appropriate sediment control measures would be applied in accordance with local regulations to reduce and control erosion; therefore, this topic was dismissed from further consideration.

Surface Water and Hydrology. Based on U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) mapping, an intermittent, seasonally flooded stream runs along the eastern flank of William Pettus Road bordering Tract V. The stream is absent by the end of the growing season in most years. A 0.27-acre freshwater pond that is connected to this stream also persists throughout the growing season (USFWS 2021a). The stream connects to Hemphill Creek located just east of Tract V. Hemphill Creek is a tributary of the San Marcos River within the Guadalupe River Basin (Bureau of Economic Geology of the University of Texas at Austin and the USGS 2010).

The Proposed Action Alternative would not change the current or historical drainage patterns for the area. During construction activities that may occur after property disposal, best management practices (BMPs) 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. Therefore, the Proposed Action Alternative would have little to no measurable impact on surface waters. The Proposed Action Alternative also would have little to no measurable impact on hydrology because property disposal would not affect surface hydrology or occur deep enough to affect groundwater; therefore, no further analysis is required.

Wetlands. USFWS NWI maps was reviewed for the potential occurrence of wetlands at the Tracts IV and V of the Gary Job Corps Center (USFWS 2021a). Although there is a stream that runs along the eastern border of Tract V, neither Tracts IV nor V contain any designated wetlands. Therefore, no impacts to wetland resources would be expected to occur as a result of the Proposed Action Alternative, and this topic is not further assessed.

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 3 are known or expected to be on or in the vicinity of the Gary Job Corps Center (USFWS 2021b).

Table 3. Federally Listed Species near the Gary Job Corps Center

Common Name	Scientific Name	Status
Piping Plover	*Charadrius melodus*	FT
Red Knot	*Calidris canutus rufa*	FT
Whooping Crane	*Grus americana*	FE

Source: USFWS 2021b.

Notes: FE = Federally endangered; FT = Federally threatened.

Species of birds classified as migratory birds of conservation concern are protected under the Migratory Bird Act (16 USC 703-712). This includes the bald eagle (Haliaeetus leucocephalus) which is also protected under the Bald and Golden Eagle Protection Act (16 USC 668-668c). Only one migratory bird, the American Kestrel (*Falco sparverius*) that has the potential to occur in the project area is listed as a Bird of Conservation Concern (BCC)(Cornell Lab of Ornithology 2021). Birds designated as BCC represent those species in need of the highest conservation priority (USFWS 2021c).

The proposed project area is not within any designated critical habitat. The project area is located on a former landfill site that includes the ALERRT Center, crop fields, and small areas of scrub-shrub habitat southeast of the ALERRT Center and along the margins of crop fields. Adjacent lands are dominated by heavily grazed grassland, crop fields, and the airfield of the San Marcos Regional Airport.

The three federally listed threatened and endangered species identified in Table 3 are migratory waterbirds that require streams, ponds and wetland habitats for migration stopovers along the way to their wintering grounds at the Texas coastline. There are no streams, ponds or wetlands within the project area that could provide suitable stopovers for these species during migration. Hemphill Creek and its associated floodplain occur just east of Tracts IV and V; however the creek is small and habitat conditions along the creek have been degraded by cattle grazing and stream diversion. Based on unsuitable habitat conditions within the project area and surrounding lands, the three federally-listed threatened or endangered bird species are not expected to be present within or adjacent to the project area; therefore, the Proposed Action Alternative would have no impact on these species and no further analysis is required.

Vegetation. The project area is located entirely within an existing disturbed area that was formerly the San Marcos Municipal Landfill. Portions of Tracts IV and V are leased to local farmers for crop and hay production, at relatively low rates to minimize mowing expenses. The current crop is corn. Natural vegetation communities are limited to a small area of scrub-shrub habitat with underlying grasses southeast of the ALERRT Center and along the margins of the crop fields. Therefore, there would little to no measurable impact to vegetation and this topic does not require further analysis.

Wildlife. The project area is located on a former landfill site that includes very limited natural vegetation and does not provide high quality habitat for wildlife. Adjacent lands are dominated by heavily grazed grassland, crop fields, and the airfield of the San Marcos Regional Airport, which also do not provide high quality habitat for wildlife. Some individuals of common wildlife species that may inhabit cropland and/or the small areas of scrub-shrub habitat may be disturbed and displaced during construction of future development of Tracts IV and V. Redevelopment of the Job Corps Center property under the Proposed Action Alternative would have little to no measurable impacts on wildlife; therefore, no further analysis of this topic is required.

Land Use. The Gary Job Corps Center was formerly part of the San Marcos Army Air Field (1942-1946), the San Marcos Air Force Base (1947-1953), the Gary Air Force Base/Edward Gary Air Force Base (1953-1956), and Camp Gary (1956-1963). Both Tracts IV and V were once a part of the former San Marcos Municipal Landfill, that spanned 353 acres. The landfill was closed in the 1980s after approaching full capacity (Texas State University 1985). Today, Tract IV is used by local farmers while portions of Tract V is used as an Advanced Law Enforcement Rapid Response Training (ALERRT) Center (DOL 2018a). On March 26, 2002, the Department of Labor entered an agreement with the City of San Marcos Police Department for the joint-construction and operation of the firearms training facility on approximately 196-acre of federally-owned land at the Job Corps Center (Keres Consulting Inc. 2008).

The ALERRT Center, a multimillion-dollar training facility in San Marcos, was created as a partnership between Texas State University, the City of San Marcos, Texas Police Department, and Hays County, Texas Sheriff's Office to address the need for active shooter response training for first responders (ALERRT 2021). Since its inception, the ALERRT program at Texas State University has trained more than 130,000 law enforcement and fire officials nationwide using scenario-based response training and has been awarded more than $72 million in state and federal grant funding (ALERRT 2021).

Tract IV is designated as Commercial (C) according to the Capital Area Council of Governments (CAPCOG) which is a regional organization serving as planner and coordinator on important regional issues in 10 counties in Texas, including Caldwell County (CAPCOG 2021). As stated in the Caldwell County Transportation Plan, Texas counties do not have the authority to implement land use plans. Instead, future land use in Caldwell County is guided by the comprehensive planning process for incorporated cities and their extra-territorial jurisdictions (ETJ). Landowners with property outside of the limits and, in the case of Tract IV, within the ETJ may develop their property without considering compatibility to adjacent properties as long as the development meets the subdivision and development requirements for the City and the County (Caldwell County 2013).

According to the Caldwell County Development Ordinance the following are not considered commercial construction: single family residential; two-family (duplex); or three family (triplex) residential; garages, sheds, barns, swimming pools, gardens or other ancillary out-buildings associated with one to three family residences; conservation open space; barns or agriculture structures not intended for common use by the public; or improvements to increase the agricultural value of property being used for agricultural purposes with fewer than 50 average-daily trips per day. A commercial site construction permit is required for development and construction or alteration of improvements on any lot for any use other than single family residential, two-family (duplex), or three family (triplex) residential (Caldwell County 2020).

Tract V is located within the Public Institutional District (P) within the City of San Marcos. According to Section 9.2.2.2P of the City of San Marcos, Texas Land Development Code (City of San Marcos 2020), the P District is reserved for properties intended to be used for civic or public institutional purpose or for major public facilities. The City does allow for "permitted and conditional uses as authorized" in the Development Code Land Use Matrix (Section 9.3.1.2) (City of San Marcos 2020). These include specific types of land uses within broad categories: some residential uses, several personal and business services, one retail use, and numerous institutional/government uses. The only agricultural land use permitted is for a Farmers Market.

The existing zoning designations, commercial and public institutional, are not expected to change as a result of the Proposed Action Alternative. Therefore, land use was not further assessed.

Energy Requirements and Conservation Potential. Executive Order (EO) 14008 requires federal agencies to efficiently operate federal facilities. The EO addresses

requirements for federal facilities in energy, fleet, buildings, and acquisition management. Currently, only parts 6, 7, and 11 are active (EO 13990).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). GHGs trap heat in the atmosphere, and the major GHGs are carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), and fluorinated gases, which are gases that are typically emitted from industrial processes. The majority of CO2 emissions, the primary GHG emitted through human activities, comes from the burning of fossil fuels (USEPA 2020). 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.

The Proposed Action Alternative would include the use of heavy equipment, typical of demolition/construction projects. All applicable construction and operation permits would be obtained as required by the State of Texas. Once construction of new commercial or institutional facilities are complete, the facilities would generate levels of GHG emissions characteristic of other commercial or institutional facilities in the area. Therefore, the Proposed Action Alternative would result in little to no measurable impact to regional climate change.

Noise. Noise is usually defined as unwanted sound, a definition that includes both the psychological and physical nature of the sound. Under certain conditions, noise may cause hearing loss, interfere with human activities at home and work, and may affect human health and well-being in various ways. The Gary Job Corps project area is surrounded by an active regional airport, commercial, residential, and recreational areas.

Under the Proposed Action Alternative, equipment used in site preparation, and construction would 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). Sensitive receptors in the vicinity of the project area may experience temporary noise impacts during construction. Construction activities would only be conducted during daylight hours. In addition, the potential increased number of vehicular trips that would be associated with any future development would not be expected to generate noise above ambient levels. Impacts to noise would temporarily increase during construction for any proposed future commercial or institutional development but would be expected to decrease once construction is complete. Future

development projects would comply with all county ordinances and state guidance and regulations concerning noise and result in little to no measurable impact; therefore, this topic was dismissed from further consideration.

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.

Transportation. The Gary Job Corps Center is bounded by State Route 21 to the northwest which also serves as the road of entry to the Center, William Pettus Road to the northeast, Farm-to-Market Road (FM) 1984 to the southeast, and State Highway 80 to the southwest. Tract IV is accessed by Elm Street and a farm road from the south. Tract V and the ALERRT Center are accessed from William Pettus Road (Route 238) located to the northeast.

Construction activities associated with future development of Tracts IV and V are expected to have negligible impacts to transportation. A short-term increase in vehicular traffic on William Pettus Road would occur during the construction phase of potential future development of Tracts IV and V due to truck and heavy equipment traffic and from commuting construction workers. Tracts IV and V are currently accessible and no new access roads would be anticipated for potential future development of these tracts.

Reuse of Tract V for an expanded ALERRT Center would result in little to no measurable impact to transportation patterns. Additional personnel, approximately 50, would occupy the new administration building. The William Pettus Road would be able to accommodate the slight increase in traffic. Because the impacts would have little to no measurable effect on transportation resources, no further analysis of this topic is required.

Utilities. No buildings or structures occur within Tracts IV and V at the Gary Job Corps Center that require electrical service, gas, municipal water and sewer. A cluster of buildings located in the northern portion of Tract V comprises a firearm training facility.

Electric. Electrical service is provided by the Lower Colorado River Authority. The Center owns and maintains the internal distribution system which includes transformers and distribution lines.

Water, Stormwater and Sewer. While the City of San Marcos, TX does provide potable water service to the Gary Job Corps Center property in the form of underground pipes at the northern end of the Center, the area encompassing Tracts IV and V appears to be separated from any municipal water conveyance system (City of San Marcos 2012a). Water distribution is provided by the Center via an underground potable water distribution system (DOL 2018a). Stormwater on Tracts IV and V is conveyed by man-made channels and detained onsite through natural absorption within the soil subsurface

(City of San Marcos 2012b). Sanitary sewer services are provided by the City of San Marcos, TX (DOL 2018a).

The Proposed Action Alternative would have little to no measurable impacts on utilities. Because the utility services available in the area have the capacity to expand to provide service for any future development in the project area under the Proposed Action Alternative, any change in demand and usage would result in little to no measurable impact and this topic was not carried forward for analysis.

5.2.2 Impact Topics Retained for Analysis

Three impact topics were retained for further analysis as further described in Section 5.3 below. These topics warranted more detailed analysis because of the need to gather more extensive data to determine whether resources are present (e.g., archaeological resources) or due to the sensitivity of resources known to be present (e.g., low-income populations) within the project area or surrounding areas. Impact topics assessed include cultural resources, hazardous and toxic substances, and socioeconomics.

5.3 Cultural Resources

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).

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 Texas Historical Commission (THC), which contains the State Historic Preservation Office (SHPO), on April 1, 2022 (Appendix A). The Area of Potential Effects (APE) was established in coordination with that office. The APE for cultural resources for the proposed action at the Gary Job Corps Center consists of Tracts IV and V which total 244.91 acres (Figure 4).

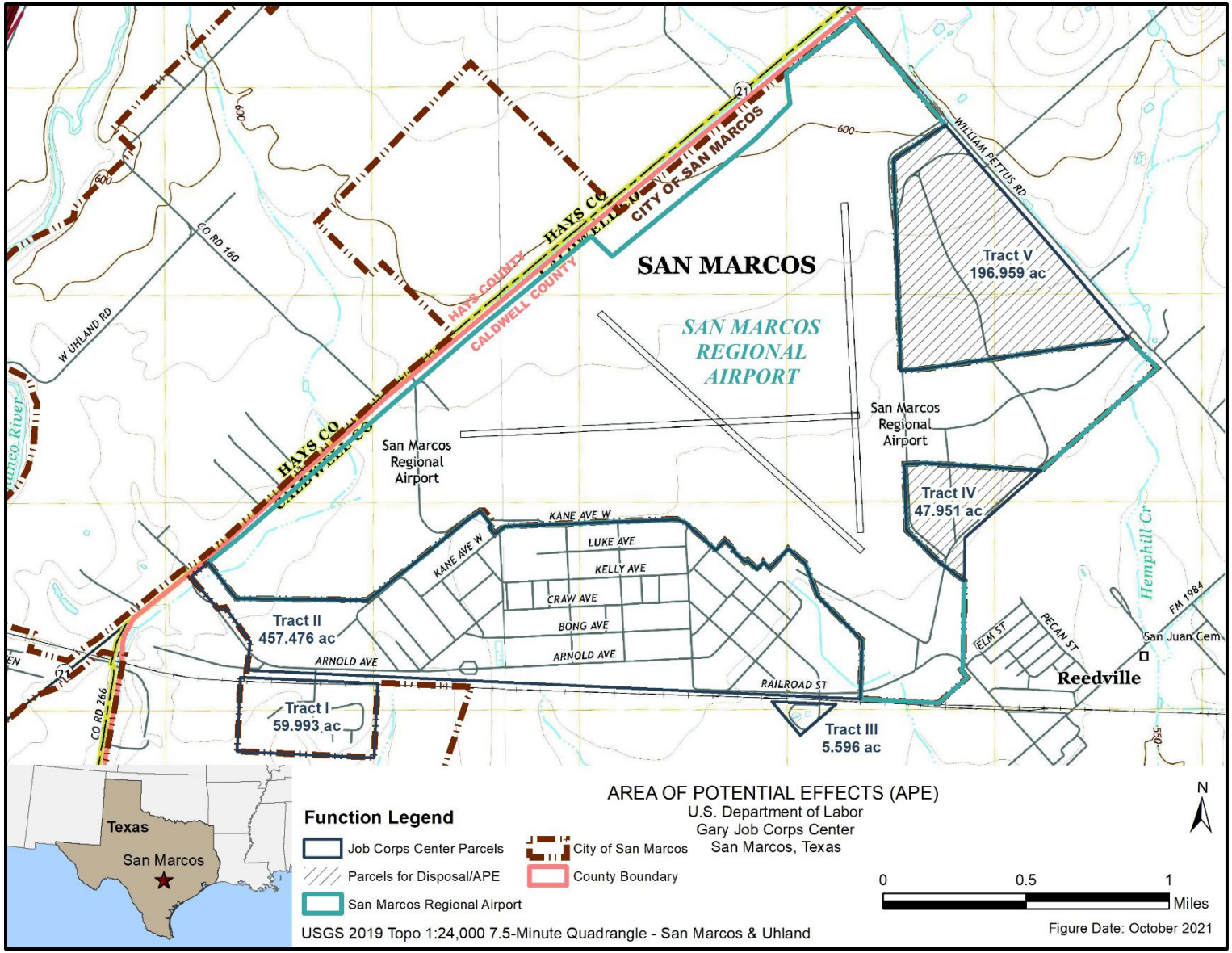

Figure 4. Area of Potential Effects (APE), Gary Job Corps Center

5.3.1 Affected Environment

A site files search was conducted online through the Texas Historic Sites Atlas (https://atlas.thc.texas.gov/Map) and archival research included a review of historic aerial photographs and historic documentation associated with the San Marcos Army Air Field, San Marcos Air Force Base, Gary Air Force Base/Edward Gary Air Force Base, and Camp Gary military occupations. No previous cultural resources surveys have been conducted and no previously recorded cultural resources have been identified at the Gary Job Corps Center.

5.3.1.1 Archaeological Resources

No previously identified archaeological sites occur in the APE. Archaeological probability in the APE is considered low. Limited natural resources (water, floral and faunal resources) occur in the vicinity of the APE and would not have supported prehistoric occupations; any extensive prehistoric occupations would be expected to occur along the Blanco River, over 2 miles to the west. Any buildings and structures associated with historic farmsteads that may have been located in the APE would have been demolished prior to construction of the San Marcos Army Air Field in 1942.

The APE was extensively disturbed from agricultural practices prior to the purchase of land and development of the San Marcos Army Air Field in 1942. The two tracts comprising the APE are located on the east side of the San Marcos Army Air Field Runway. In 1953, Tract IV contained an access road leading to a rectangular area surrounded by a perimeter road; Tract V appears to have been used as an agricultural field (USGS 1953). The rectangular area appears to be a small landfill associated with the U.S. Air Force occupation. In 1958, the rectangular area in Tract IV was clearly a landfill, now associated with Camp Gary (U.S. Army); small, disturbed areas occurred in a grid pattern in Tract V (USGS 1958). In the 1960s, the City of San Marcos opened up a landfill, the San Marcos Municipal Landfill, at the location of the former Camp Gary landfill, east of the San Marcos Regional Airport (Texas State University 1985:8). By 1973, the landfill expanded to encompass both Tracts IV and V and the area in between (USGS 1973). Landfill activities continued in the APE until pre-1981 when it reached capacity and was closed (Nationwide Environmental Title Research [NETR] 1981; Texas State University 1985:8). No intact archaeological resources are likely to occur within the two tracts that comprise the APE.

5.3.1.2 Architectural Resources

No building or structures associated with historic farmsteads occur within the two tracts and no buildings or structures associated with the San Marcos Army Air Field, the San Marcos AFB/Gary AFB, or Camp Gary were constructed in this area east of the air field. No architectural resources are currently located within the APE.

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 Alabama Quassarte Tribal Town, the Alabama-Coushatta Tribe of Texas, the Apache Tribe of Oklahoma, the Caddo Nation of Oklahoma, the Cheyenne & Arapaho Tribes of Oklahoma, the Comanche Nation of Oklahoma, the Kiowa Indian Tribe of Oklahoma, the Mescalero Apache Tribe of the Mescalero Reservation, the Shawnee Tribe, and the Tonkawa Tribe of Oklahoma in letters dated January 27, 2022 (Appendix A). No comments or concerns were received from the Tribes; therefore, 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

Impact analyses presented here are intended to comply with the requirements of both NEPA and Section 106 of the NHPA, and in accordance with the Advisory Council on Historic Preservation (ACHP) regulations implementing Section 106 (36 CFR Part 800, Protection of Historic Properties). 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). 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.

5.3.2.1 No Action Alternative

Under the No Action Alternative, the Gary Job Corps Center tracts would continue to be owned and managed by the DOL. No changes to existing conditions from ground disturbance or other construction would occur. Because it is unlikely that any previously identified archaeological sites occur (based on extensive prior ground disturbance and use as a landfill) 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 because there is limited potential for intact archaeological resources to occur because of the extensive prior ground disturbance and use as a landfill. No buildings or structures associated with San Marcos Army Air Field, San Marcos AFB, Gary AFB/Edward Gary AFB, and Camp Gary (1943-1964) were constructed within the two tracts and no Native American resources are located in the APE. The Proposed Action

Alternative is expected to have no impact to historical, architectural, archeological, or cultural resources.

5.4 Hazardous and Toxic Substances

This section describes the existing hazardous and toxic substances conditions, as well as potential impacts that could result from taking no action or implementation of the Proposed Action Alternative.

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 two tracts were originally part of the San Marcos Army Air Field, San Marcos AFB, Gary AFB/Edward Gary AFB, and Camp Gary, which operated from 1943 through the establishment of the Gary Job Corps Center in 1964 until it was transferred to the Department of Labor in 1971.

5.4.1.1 Hazardous Materials associated with the San Marcos Municipal Landfill

Tracts IV and V of the Gary Job Corps Center are part of a former landfill. By 1953 through 1958, Tract IV contained a landfill associated with both the U.S. Air Force occupations (San Marcos Air Force Base, Gary Air Force Base/Edward Gary Air Force Base) and the Army occupation (Camp Gary). In the 1960s, the City of San Marcos opened up a landfill, the San Marcos Municipal Landfill, at the location of the former Camp Gary landfill, east of the San Marcos Regional Airport (Texas State University 1985:8). By 1973, the landfill had expanded to encompass both Tracts IV and V and the area in between (USGS 1973).The San Marcos Municipal Landfill was operated by the city and landfill activities continued until sometime prior to 1981, when it reached capacity and was closed (NETR 1981; Texas State University 1985:8).

The San Marcos Municipal Landfill encompassed an area of approximately 353 acres, of which the two Gary Job Corps Center tracts comprise about 69 percent (Figure 5). A preliminary assessment was conducted in 1982 and a site inspection was conducted in 1999 (Homefacts.com 2021). In 1993, a Partnering Agreement between DOL and the City of San Marcos was implemented (Lichaa 1996) and defined groundwater monitoring procedures under the Solid Waste Permit Number 640 for the former San Marcos Municipal Landfill. Ten groundwater monitoring wells were placed in the southern portion of the landfill: five wells were located in Tract IV, two wells in Tract V, and three wells on the parcel in between the two DOL tracts (Jenkins 1996). Groundwater samples were taken on December 27, 1993; July 28, 1994; December 14, 1994: June 28, 1995;

and September 29, 1995. Parameters analyzed included volatile organic compounds (VOCs), polychlorinated biphenyl (PCB), cadmium (Cd), iron (Fe), Ph, and manganese (Mn) (Lichaa 1996). Based on the decrease of all parameters during the period of sampling and additional work conducted to improve site conditions, the Texas Natural Resource Conservation Commission (TNRCC) notified the City of San Marcos to cease sampling and plug all monitoring wells (Lichaa 1996). The ten groundwater monitoring wells were pulled and plugged with concrete in November 1996 and the TNRCC was notified in December 1996 that all post-closure monitoring efforts were completed at the former landfill (Jenkins 1996).

The San Marcos Municipal Landfill was once listed as a Texas Superfund Site in Reedville, Texas with the EPA Site # TXD980625222 (USEPA 2021). The landfill is not listed on the National Priorities List (NPL). It is currently registered as an Archived Superfund site by the USEPA (Homefacts.com 2021).

The San Marcos Municipal Landfill is one of three operable units (OUs) within the former boundaries of Gary AFB that are considered Formerly Used Defense Sites (FUDS) by the U.S. Army Corps of Engineers (USACE) (USACE 2019). One project (OU 01) consisting of the removal of 19 underground storage tanks (USTs) was completed in 2000. Two projects (OU 02 and OU 03) related to hazardous, toxic, and/or radioactive waste (HTRW) were listed as incomplete as of 2019 (USACE 2019). Project OU 02 is the designation for the San Marcos Municipal Landfill; project OU 03 is associated with ground water contamination related to JP-4 fuel storage tanks and used oil tanks (USACE 2019). No further information on the status of the remedial action for the San Marcos Municipal Landfill was provided (USACE 2019).

5.4.1.2 Hazardous Materials Associated with the Gary Job Corps Center

According to the 2018 Facilities Report, 117 buildings or 45 percent of all buildings at the Gary Job Corps Center are over 50 years old (DOL 2018a). Solid waste disposal is serviced by Commercial Waste Service and Texas Disposal Systems. Under the EPA's Resource Conservation and Recovery Act (RCRA), the Gary Job Corps Center is recognized as a small quantity generator - USEPA ID# TX1161630644 with identified waste products including lead/acid batteries (3 lbs/month), organic solvent (150 gals/month), and waste petroleum. Hazardous waste disposal at the Center is serviced by Commercial Hazardous Waste Disposal Service and Safety-Kleen Corporation (DOL 2018b).

Hazardous materials are stored onsite within one of the Job Corps Center's 27 storage and warehousing buildings. The majority of the storage buildings are 76 years old and many are rated as in poor and/or unsafe condition. The buildings suffer from damaged asbestos siding, deteriorated interiors, outdated mechanical and electrical systems and unreliable fire safety systems. Neither the hazardous materials nor the storage and warehousing buildings reported above are present within Tracts IV and V of the Gary Job Corps Center.

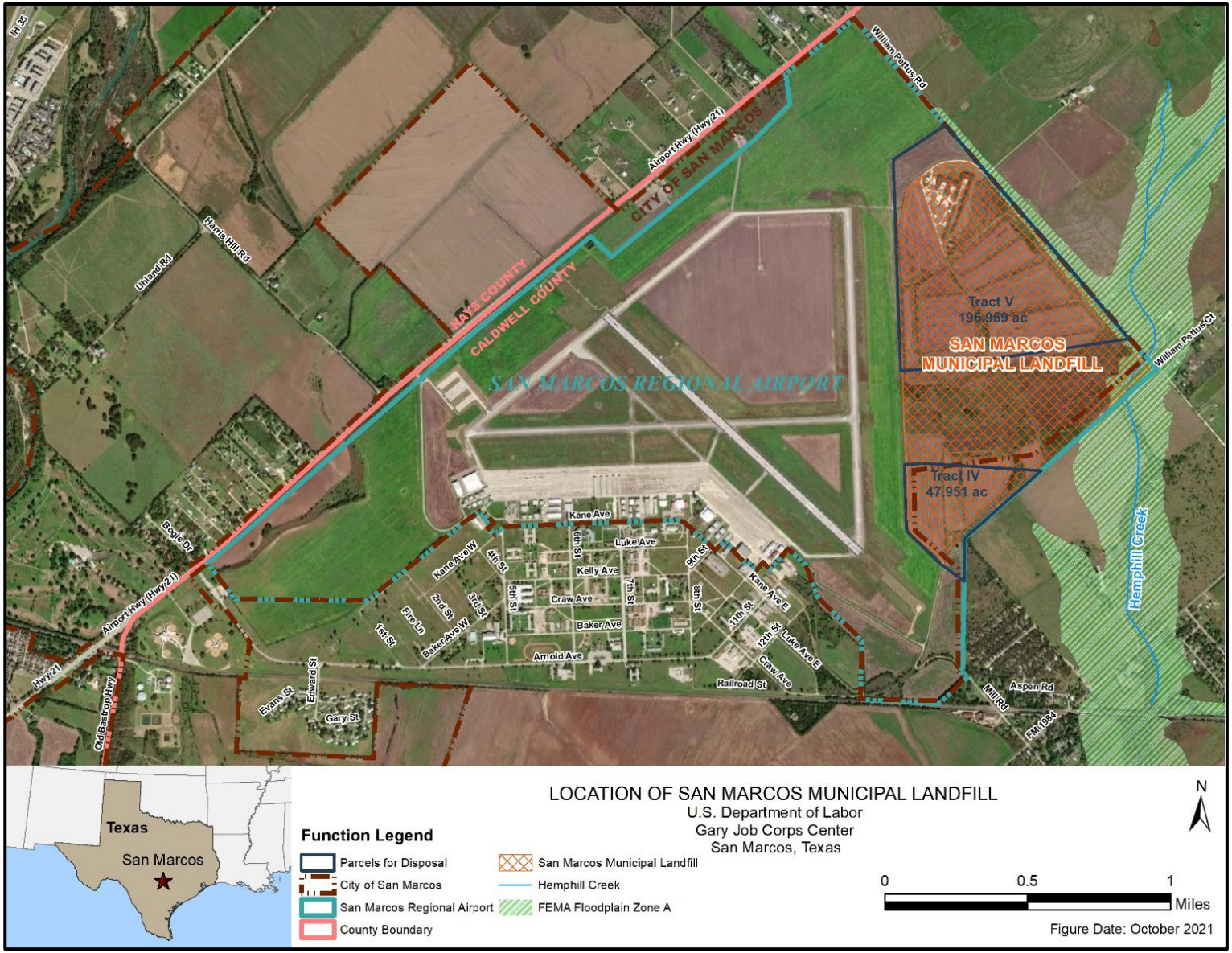

Figure 5. Former San Marcos Municipal Landfill Boundaries and Tracts IV and V

5.4.2 Environmental Consequences

In this section the potential impacts relating to hazardous and toxic substances that could result from taking no action and implementation of the Proposed Action Alternative are described.

5.4.2.1 No Action Alternative

Under the No Action Alternative, the Gary Job Corps Center tracts would continue to be owned and managed by the DOL. Any future construction at the ALERRT Center would be coordinated with DOL under the existing agreement for the joint-construction and continuing operation of the firearms training facility.

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 entire property would be transferred in "as-is condition" with a deed covenant and would be suitable for commercial/institutional reuse.

The Caldwell County Development Ordinance states that "the development and use of real property in Caldwell County may be subject to regulation by other jurisdictions including the Texas Commission on Environmental Quality (TCEQ), the U.S. Corps of Engineers, FEMA, USEPA, U.S. Fish and Wildlife, and other County regulations" (Caldwell County 2020). The TCEQ has jurisdiction over development of land "located over any part of a closed municipal solid waste landfill facility", such as Tracts IV and V (Texas Solid Waste Disposal Act (Section 361.533)(Texas Health and Safety Code 1989). The owner/lessee can apply for a permit to develop the land but the permit application must include "a registered professional engineer's verified certification that the proposed development is necessary to reduce a potential threat to public health or the environment or that the proposed development would not increase or create a potential threat to public health or the environment. The certification must indicate the registered professional engineer's determination of whether the proposed development would damage the integrity or function of any component of the landfill's: (1) final cover; (2) containment systems; (3) monitoring systems; or (4) liners" (Texas Solid Waste Disposal Act (Section 361.533) (Texas Health and Safety Code 1989)). Therefore, both Tracts IV and V could be developed but with an appropriate certification and permit process resulting in no significant impact.

5.5 Socioeconomic Environment

This section describes the existing socioeconomic conditions, as well as potential impacts that could result from implementation of the No Action and Proposed Action Alternatives.

5.5.1 Affected Environment

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

5.5.1.1 Economic Development

Local Economic Activity. The top employers, by the number of employees, in the Greater San Marcos Region, which includes the City of San Marcos and Hays and Caldwell counties, are Texas State University (3,730 employees), Hays Consolidated Independent School District (CSID) (3,430 employees), Amazon Fulfillment (2,200 employees), Premium Outlets (1,600 employees), and Tanger Outlets (1,540 employees) (Greater San Marcos Partnership 2021).

According to U.S. Census Bureau American Community Survey (USCB ACS) 2019 data, the unemployment rate for those aged 16 years and over in City of San Marcos is 5.7 percent, 2.7 percent in Caldwell County, 4.0 percent in Hays County, 5.0 percent in Texas, and 5.3 percent in the United States (USCB 2019a).

The effects of the Covid-19 pandemic have not spared the economy of the Greater San Marcos Region as the city has witnessed an economic downturn from business and school closures. In 2020, employment levels dropped by approximately 16 percent between January and April. As of July 2021, they have yet to recover to their January 2020 peak level (Bureau of Labor Statistics [BLS] 2021a). According to the annual average labor force data by county for 2020 from the Bureau of Labor Statistics (BLS), both Caldwell and Hays counties have unemployment rates of 6.3 percent out of a labor force of 19,322 and 121,304, respectively (BLS 2021b).

Texas University resumed in-person attendance in the Fall 2021 Semester. The San Marcos CISD began its first day of in-person learning for the 2021-2022 academic year on August 23, 2021 (San Marcos CISD 2021b).

Regional Economic Activity. According to the Federal Reserve, economic activity in the Eleventh District, which includes the State of Texas, maintained a solid expansion with growth in manufacturing and nonfinancial services sectors for the July 2021 reporting period. Overall activity, however, remained somewhat below pre-pandemic levels. Home sales and apartment demand has remained elevated and even surged, in some cases pushing up rents. Employment growth was moderate, and upward wage pressures increased with labor shortages being a significant issue for many firms. Ongoing supply chain disruptions have hampered activities across industries such as retail (Federal Reserve 2020).

The current reporting period reflects similar trends from the previous year as the economy began to regain its footing in summer of 2020 following unprecedented declines. Manufacturing and service sectors were beginning to rebound along with retail spending. However, labor market conditions and overall economic activity were weak compared to their positions a year later (Federal Reserve 2020).

The civilian labor force in June of 2021 was 14,071,243, and has not noticeably changed from the previous year. Percent unemployment in the state, however, was 6.5 percent in June 2021, a 3.7 percent decrease from the previous year (BLS 2021c). Industries gaining jobs over the year included leisure and hospitality (+16.7 percent); professional and business services (+8.9 percent); other services (+8.0 percent); mining and logging (+6.9 percent); information (+5.9 percent); trade, transportation, and utilities (+5.3 percent); financial activities (+3.8 percent); education and health services (+2.6 percent); government (+2.4 percent); and manufacturing (+1.8 percent). The employment and unemployment rates are estimates, which are primarily based on surveys created and mandated by the U.S. Bureau of Labor Statistics (BLS 2021c).

Economic conditions have begun to improve somewhat as vaccination rates among the population continue to rise. With leisure and hospitality operating closely to full capacity and schools of both K-12 and higher-level institutions reinstituting in-person classes in the fall, society is slowly returning to pre-pandemic norms. However, the Delta variant of the Covid-19 virus poses a potential impediment to overall economic recovery.

5.5.1.2 Population Demographics

The City of San Marcos with a population of 63,220 ranks in 61st place out of 1,698 cities in Texas for total population according to the U.S. Census Bureau (USCB 2020a). The estimated population of San Marcos in 2019 has increased by 23.2 percent from the estimated 2014 population of 51,289 (USCB 2014, 2019b). The majority of San Marcos lies within Hays County with a small portion located within adjoining Caldwell County; the Gary Job Corps Center and San Marcos Regional Airport make up the portion of San Marcos that is within Caldwell County. For 2019, San Marcos' estimated population makes up approximately 24.7 percent that of Caldwell and Hays counties combined (USCB 2019b).

Hays County, with a population of 213,366, ranks 24th out of 254 counties in Texas (USCB 2020a) for total population. According to USCB, the 2019 estimated population was a 25.2 percent increase from the 2014 estimated population of 170,410 (USCB 2014, 2019b). The projected population of Hays County is expected to be 285,370 in 2025, 421,603 in 2035 and 746,149 in 2050 (Texas Demographic Center [TDC] 2018).

Caldwell County, with a population of 42,144, ranks 75th out of 254 counties in Texas for total population. According to USCB, the 2019 estimated population was a 8.4 percent increase from the 2014 estimated population of 38,870 (USCB 2014; USCB 2019b). The projected population of Caldwell County is expected to be 47,589 in 2025, 53,761 in 2035 and 62,066 in 2050 (TDC 2018).

In the City of San Marcos, the median age is 24 and approximately 86.1 percent of the estimated population is 18 years and over, compared to 76.9 percent within Hays County and 75.9 percent within Caldwell County (USCB 2019c). In the total population, 97.4 percent identified as being from one race, while 2.6 percent identified as representing two or more races. Of the 97.4 percent representing one race, 84.3 percent identified as white, 6.4 percent identified as Black or African American, 2.5 identified as Asian, 0.3

identified as American Indian or Alaskan Native and 3.9 identified as Some Other Race (USCB 2019c).

Approximately 43.1 percent of the total population identified as Hispanic or Latino which crosscuts the two race categories. Of those 43.1 percent, a majority identified as Mexican (37.8 percent) followed by those identifying as Other Hispanic or Latino (3.8 percent), Puerto Rican (1.4 percent) and Cuban (0.1 percent) (USCB 2019b).

5.5.1.3 Housing

The median value of an owner-occupied housing unit in the City of San Marcos is $171,500. This is approximately 28 percent cheaper than the median value of Hays County housing ($238,700) and 18 percent more expensive than Caldwell County housing ($144,800). The median value of housing in the State of Texas, at $172,500, is much higher than that of the City of San Marcos. The majority of the housing in the City of San Marcos are one-unit, detached structures (37.2 percent), with the next most common housing types being structures with 10 to 19 units (18.1 percent) and those with 20 or more units (15.3 percent) (USCB 2019e). Approximately 29.7 percent of housing units in the City of San Marcos were owner-occupied while nearly 70.3 percent were renter-occupied as shown in Table 4.

Table 4. Housing Characteristics, Gary Job Corps Center Region, 2019

Jurisdiction	Total Housing Units	Percent Vacant	Percent Owner Occupied	Median Value Owner Occupied	Median Rent Renter Occupied	Median Household Income
City of San Marcos	25,472	9.1	29.7	$171,500	$1,064	$40,370
Hays County	78,715	6.7	62.3	$238,700	$1,154	$68,717
Caldwell County	14,889	9.6	67.4	$144,800	$920	$54,152
Texas	10,937,026	11.4	62.0	$172,500	$1,045	$61,874
United States	134,428,986	12.1	64.0	$217,500	$1,062	$62,843

Source: US Department of Commerce, Bureau of the Census, American Community Survey 2019e.

Currently, there are 306 single-family homes listed for sale in the City of San Marcos, Texas. Table 5 shows the price breakdown for the listed homes.

Table 5. Single-family Homes Listed for Sale, City of San Marcos

Listed Price Range	Number of Homes Listed
$0 - $149,999	2
$150,000 - $199,999	9
$200,000 - $249,999	18
$250,000 - $299,999	91
$300,000-349,999	62
$350,000-399,999	41
Over $400,000	83
TOTAL	**306**

Source: National Association of Realtors (Realtor.com) 2021.

5.5.1.4 Community Services

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

Education. The San Marcos Consolidated Independent School District serves more than 7,500 students in the City of San Marcos, and Hays, Caldwell and Guadalupe counties. The district has six elementary schools, two middle schools, and one high school throughout its 210 miles of coverage (San Marcos CISD 2021a). In the City of San Marcos, approximately 87.3 percent of the population 25 years or older have a high school diploma, and approximately 33.5 percent have a bachelor's degree or higher (USCB 2019f).

The nearest schools to the property include Hill Country Christian School, Travis Elementary School, Texas Preparatory School, and Texas State University.

Health Services. San Marcos Treatment Center is located approximately 6 miles northwest of the Gary Job Corps Center. The center is a 212-bed psychiatric residential treatment facility located in a 65-acre therapeutic setting with an abundance of trees and wildlife (San Marcos Treatment Center 2021). A Student Health Center, located on Thorpe Lane approximately 5 miles from the Gary Job Corps Center, provides primary care and sports medicine services for students at the Texas State University San Marcos (Texas State University 2021).

Medical and dental services are provided for resident trainees at the Gary Job Corps Center in the Infirmary Building 5-100. The building, constructed in 1990, contains medical exam offices, dental offices, labs, patient wards, totaling 12 beds, and Trainee Employee Assistance Program (TEAP) classrooms. The medical/dental facilities are in good condition, adequate in size and function well (DOL 2018a).

Law Enforcement. The City of San Marcos Police Department provides law enforcement for the area and is located on 2300 I-35 San Marcos, TX 78666. The full-

service police agency provides 24/7 police response to the City of San Marcos through its 106 sworn and 52 non-sworn employees (San Marcos Police Department 2021).

Fire Protection. The San Marcos Fire Department provides emergency response, which includes fire and medical operations. The Fire Administration Building is based in 100 Carlson Circle

San Marcos, TX 78666. Fire Station 5, the closest San Marcos fire station to the Gary Job Corps Center, is located approximately 10 miles away and has a thirteen-minute response time (San Marcos Fire Department 2021). According to the Department of Labor 2018 Facility Report, the sprinkler systems in many buildings have been shut off. The fire protection systems in several older warehouse buildings lack code compliance. The fire hydrant system at the Gary Job Corps Center is pressurized by the City of San Marcos. An on-campus fire station, located in Fire Department Building 7-253, is no longer functioning (DOL 2018a).

Recreation. The City of San Marcos has almost 1,800 acres of parkland comprising of neighborhood and special use parks, greenspaces, and the regionally-serving riverfront park system. There are currently ten regional parks in San Marcos, totaling 116 acres which is about 6 percent of the city's parkland. Additionally, 16 smaller neighborhood parks make up another 4 percent. Special Use Parks comprising of sports fields and golf courses that accommodate specific recreational activities, make up 6 percent of total parkland. Greenspace and natural areas make up the bulk of the city's parkland, totaling 1,486.3 acres, or 83 percent. Currently, there are 13 greenspaces in San Marcos (HALFF Associates, Inc. 2019). Several parks operated and maintained by the City of San Marcos that are within proximity to the Gary Job Corps Center include:

- The Gary Sports Complex, a 42.6-acre special use park with 8 baseball/softball fields, 2 concession stands, 7 picnic tables, restroom facilities and a playground, is located at 2600 Airport Hwy 21 less than a quarter mile from the Job Corps Center.
- The Blanco River Village, a 12.8-acre greenspace and natural area, is located at 350 Trestle Tree around 3 miles from the Job Corps Center.
- The Blanco Shoals Natural Area, a 91.5-acre greenspace and natural area straddling the Blanco River with tall cottonwood & pecan trees and fish, is located at 1201 E River Ridge Parkway about 6.3 miles from the Job Corps Center.

5.5.1.5 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. The USCB uses a set of money income thresholds that vary based on family size and composition to determine who is in poverty. For example, a family of four with two related children under the age of 18 making at or less than the threshold of a mean income of $26,246 is considered to be in poverty based on 2020 estimates (USCB 2020b). In 2019, the mean family income in the City of San Marcos was $72,812 which is 77.2 percent greater than the 2014 mean family income of $41,069 (USCB 2019a).

According to USCB, the City of San Marcos has a higher percentage of individuals below the poverty level at 32.1 percent compared to the state value of 14.7 percent (USCB 2019c; USCB 2019d).

The proposed project area is located within Census Tract (CT) 9601.01 in Caldwell County, Texas. According to USCB ACS 5-Year Demographic and Housing Estimates for 2019, CT 9601.01 has an estimated population of 7,888; 97.6 percent of which comprises of one race while the remainder represents two or more races (USCB 2019c). Within the one race category, the White demographic, at 82.3 percent, represents the overwhelming majority followed by some other race (13.5 percent) and American Indian and Alaskan Native (1.5 percent). Of the total population in CT 9601.01, 68.7 percent identified as Hispanic or Latino; the majority of which identified as Mexican (USCB 2019c). Table 6 summarizes minority and low-income populations for the area.

Table 6. Minority and Low-Income Populations: Region and Larger Regions, 2018

Jurisdiction	Total Population	Percent White	Percent Black or African American	Percent American Indian/ Alaska Native	Percent Asian	Percent Native Hawaiian or Other Pacific	Percent Some Other Race	Percent Ethnicity Hispanic/ Latino	Percent of Individuals Below Poverty Level
City of San Marcos	63,220	84.3	6.4	0.3	2.5	0.1	3.9	43.1	32.1
Hays County	213,366	88.5	4.2	0.4	1.6	0.0	2.8	38.9	13.7
Caldwell County	42,144	80.8	6.1	0.6	1.0	0.1	10.0	52.2	18.9
Texas	28,260,856	74.0	12.1	0.5	4.8	0.1	5.8	39.3	14.7
United States	324,697,795	72.5	12.7	0.8	5.5	0.2	4.9	18.0	13.4

Source: US Department of Commerce, U.S. Census Bureau, 2014-2019 American Community Survey 5-Year Estimates. (USCB 2019c; USCB 2019d)

5.5.1.6 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 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.

5.5.2 Environmental Consequences

In this section the potential impacts to socioeconomic resources that could result from the No Action and Proposed Action Alternatives are described.

5.5.2.1 No Action Alternative

The No Action Alternative would have no impacts on economic development, population demographics, housing, community services, environmental justice, and protection of children because there would be no change from existing conditions.

5.5.2.2 Proposed Action Alternative

The following section details potential impacts to each aspect of socioeconomics that could result from implementation of the Proposed Action Alternative.

Economic Development. The Proposed Action Alternative would result in beneficial impacts due to increased revenue to the area during the construction phase (use of local construction labor) of future development of Tract IV and Tract V. Long-term effects on the local economy would have little to no measurable impact.

Population Demographics. The Proposed Action Alternative would not result in any detectable changes to the demographics of the local or regional areas.

Housing. The Proposed Action Alternative would not result in any detectable changes to the housing in the local area.

Community Services. There are no anticipated impacts to police, fire, or law enforcement public services (i.e., police and fire protection, hospital services) or recreational opportunities as a result of the Proposed Action Alternative.

Environmental Justice. The Proposed Action Alternative would not negatively affect low-income or minority families with respect to health, community disruption, transportation, planned development, or employment. No families, whether in these socioeconomic groups or not, would be relocated as a result of the Proposed Action Alternative. There would be no changes in local populations or other social factors as a result of the Proposed Action Alternative. The Job Corps Center would continue to provide services to low-income families, through its educational and training program. Therefore, the Proposed Action Alternative would meet the requirements of EO 12898.

Protection of Children. There are no anticipated impacts to the safety of children during the construction phase of potential future development within Tract IV and Tract V. 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. There would be no impacts to the safety of children from reuse. Therefore, the Proposed Action Alternative would meet the requirements of EO 13045.

5.6 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 Gary Jobs Corps 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).

5.6.1 Actions at the Gary Job Corps Center Property

Within the past five years, the operator has completed and began current maintenance, repair, and minor renovation projects on the Gary Job Corps Center. These projects have included:

Completed Project(s)

- Roof repair on Building 5-159
- Roof repair on Building 7-252

Current Project(s)

- Renovate two dormitories (Buildings 7-114 and 7-115)

Reasonably foreseeable future actions other than the Proposed Action Alternative 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):

- Shift entrance and construct associated new gatehouse and welcome center, as well as new fencing
- Improve site drainage
- Relocate various functions (i.e., HVAC vocation, risk management, and recreation) to buildings better suited for long-term use
- Renovate one building to relocate education functions (Building 7-276)

5.6.2 Actions by Others in the Surrounding Area

The San Marcos Regional Airport recently completed an Airport Master Plan Update (San Marcos Regional Airport 2020). The plan has a detailed assessment of the airport

facilities including airside, land side, and land use. The plan identifies needs, alternatives, proposed improvements, and the associated potential impacts. Two taxiways are expected to be repaved and two "No-Taxi Islands" to be constructed in 2022 (San Marcos Regional Airport 2020:6-11-6-14). Funding for these projects is still ongoing. None of the other airport improvements are expected to be completed in the next five years (San Marcos Regional Airport 2020:6-10-6-15).

The Airport Master Plan identified potential development in the surrounding area including two residential developments planned north of the airport; industrial development south of the Gary Job Corps Center, the San Marcos Air, Rail and Truck (SMART) terminal development which is expected to utilize the airport and existing rail line; a large mixed-development area identified as the Cotton Center which would include portions of Tracts IV and V; and extension of Yarrington Road from the east (San Marcos Regional Airport 2020:2-43).

Farm-to-Market (FM) Road 110 is a new roadway that is proposed immediately west of the airport, extending through the Gary Job Corps Center between the main campus to the east and the staff housing area to the west (City of San Marcos 2018; DOL 2018a). The City of San Marcos expects to start construction in 2023 on a connection road from FM 110 to Airport Drive (City of San Marcos 2021b).

5.6.3 Potential Cumulative Impacts

Recent maintenance, repair, and minor renovation projects conducted at the Gary Job Corps Center (roof repairs) did not result in any adverse impacts and provided needed improvements to the facility. All of the potential future projects planned for the facility are expected to result in beneficial impacts to continued operation of the Center, while any adverse impacts would likely be negligible or mitigated, pending assessment as part of future NEPA studies, if required.

5.6.3.1 No Action Alternative

Under the No Action Alternative, the proposed project would not occur. Therefore, the proposed project would not contribute to cumulative impacts resulting from past, present and reasonably foreseeable future projects in the surrounding area.

5.6.3.2 Proposed Action Alternative

As presented in Sections 5.2,.5.3, 5.4 and 5.5, the Proposed Action Alternative would have no impact on air quality, energy, and land use; and little to no measurable impact on floodplains, soils and geology, surface water, vegetation, wildlife, climate change, noise, economic development, transportation and utilities. The potential effects associated with most of these impact topics (i.e., vegetation, surface water, noise, economic development and transportation) would be short-term effects related to construction on the disposed/sold parcels, if any occurs. The Proposed Action Alternative, therefore, in combination with other past, present, and reasonably foreseeable future activities, would not contribute to significant cumulative impacts to the surrounding area.

5.7 Mitigation Measures or Best Management Practices

Implementation of the Proposed Action Alternative would incorporate measures to mitigate environmental impacts during construction, operation, and maintenance activities, associated with possible reuse, and are as follows:

- Prior to the commencement of any 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.
- 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 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.

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

6.0 FINDINGS AND CONCLUSIONS

This EA was conducted in accordance with the requirements of NEPA, the CEQ regulations implementing NEPA (40 CFR 1500), and the DOL NEPA Compliance Procedures (29 CFR §11). As analyzed and discussed in this EA, impacts of the Proposed Action Alternative for disposal and reuse of the Gary Job Corps Center tracts 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.

7.0 AGENCY CONSULTATION

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

- Texas Historical Commission (THC) serves as the State Historic Preservation Office (SHPO)
- U.S. Fish & Wildlife Service (USFWS)
- Alabama Quassarte Tribal Town
- Alabama-Coushatta Tribe of Texas
- Apache Tribe of Oklahoma
- Caddo Nation of Oklahoma
- Cheyenne & Arapaho Tribes of Oklahoma
- Comanche Nation of Oklahoma
- Kiowa Indian Tribe of Oklahoma
- Mescalero Apache Tribe of the Mescalero Reservation
- Shawnee Tribe
- Tonkawa Tribe of Oklahoma

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 COMMENT SOLICITATION LETTERS