

ENVIRONMENTAL ASSESSMENT

JULY 2022

FORT SIMCOE JOB CORPS CIVILIAN CONSERVATION CENTER WATER LINE REPLACEMENT WHITE SWAN, WASHINGTON

Prepared for:

DEPARTMENT OF LABOR

Office of Job Corps

Division of Facilities and Asset Management

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LIST OF ACRONYMS AND ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation
ACM	Asbestos-Containing Materials
ACS	American Community Survey
APE	Area of Potential Effects
AST	Above Ground Storage Tank
BIA	Bureau of Indian Affairs
BCC	Birds of Conservation Concern
CCC	Civilian Conservation Corps
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CH ₄	Methane
CO ₂	Carbon Dioxide
DAHP	Department of Archaeology and Historic Preservation
dB	Decibel
DOL	U.S. Department of Labor
EA	Environmental Assessment
EO	Executive Order
ESC	Engineering Support Contractor
ESD	Employment Security Department
FACP	Fire Alarm Control Panel
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impact
FT	Federally Threatened
GHG	Greenhouse Gas
GLO	General Land Office
GSF	Gross Square Feet
HUD	Housing and Urban Development
HVAC	Heating, Ventilation, and Air Conditioning
IPaC	Information, Planning, and Conservation
IPCC	Intergovernmental Panel on Climate Change
LBP	Lead-based Paint
MASD	Mount Adams School District
N ₂ O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NCADAC	National Climate Assessment and Development Advisory Committee

NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NRCS	National Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
PCB	Polychlorinated Biphenyl
pCi/L	picoCuries per liter
PM10	Particulate Matter
PUBHx	Freshwater Pond Habitat
THPO	Tribal Historic Preservation Office
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
VoIP	Voice over Internet Protocol
WA	Washington
WAC	Washington State Administrative Code
WDOE	Washington State Department of Ecology
WDFW	Washington Department of Fish and Wildlife
WISAARD	Washington Information System for Architectural and Archaeological Records Data
YNTC	Yakama Nation Tribal Council
YVCOG	Yakima Valley Conference of Governments

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.

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 Alternative on the natural and built environment.

Under the No Action Alternative, no new construction would occur and existing facilities would continue to be used.

The Proposed Action Alternative is to replace the water distribution system including: installation of 2,000 linear feet of new water line; pipe burst 8,600 linear feet of existing 4-inch Transite or asbestos-cement pipe; removal of existing pipe connections; installation of new well pump controls at each of the three pump houses to automate the shared pumping duties between all three wells, and replacement of seven fire hydrants.

Table 1 summarizes the evaluation of impacts to resources as a result of the No Action and Proposed Action Alternatives. The evaluation performed for this EA shows that no significant impacts would be 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	No impact
Prime and Unique Agricultural Land	No impact	No impact
Soils and Geology	No impact	Little to no measurable impact
Surface Water (Streams, Ponds, etc.) and Hydrology	No impact	Little to no measurable impact
Threatened and Endangered Species and Critical Habitats	No impact	No impact
Vegetation	No impact	Little to no measurable impact
Wetlands	No impact	No impact
Wildlife	No impact	Little to no measurable impact
Climate Change	No impact	Little to no measurable impact

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

Impact Topic (Alphabetical)	No Action Alternative	Proposed Action Alternative
Cultural Resources		
Archeological Resources	Resource not present	Resource not present
Historic Buildings	No impact	No impact
Historic Properties of Religious or Cultural Significance to Native American Tribes	Resource not present	Resource not present
Energy Requirements and Conservation Potential	No significant impact (moderate impact)	Beneficial impact
Hazardous and Toxic Substances	No impact	Little to no measurable impact
Land Use	No impact	No impact
Noise	No impact	Little to no measurable impact
Socioeconomics		
Economic Development	No impact	Beneficial impact
Population Demographics	No impact	No impact
Housing	No impact	No impact
Community Services	No impact	Beneficial impact
Environmental Justice	No impact	No impact
Indian Trust Resources	Resource not present	Resource not present
Protection of Children	No impact	No impact
Transportation	No impact	Little to no measurable impact
Utilities	No significant impact (moderate impact)	Beneficial impact

1.1 Conclusions

Based on the analysis discussed in Section 5 of this EA, the Proposed Action Alternative would have no significant adverse impact 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 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 mission of the Job Corps 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 replace the water distribution system at the Fort Simcoe Civilian Conservation Center.

This EA was conducted in accordance with 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) as last amended in July 2005.

The purpose and need for the Proposed Action Alternative is 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 Fort Simcoe Job Corps Civilian Conservation Center (hereafter referred to as the Fort Simcoe Civilian Conservation Center or the Center) is located at 40 Abella Lane, White Swan, WA 98952, Yakima County, Washington along Fort Simcoe Road, approximately 8 miles west-southwest of downtown White Swan, Washington. The Center is situated in a remote location west of Fort Simcoe Historical State Park in the foothills of the Cascade Mountains. The Center is located within the Yakama Indian Reservation, a Native American reservation of the federally recognized tribe known as the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation 2020a). The project area is located at approximately 46°20'14.5" north latitude and 120°51'24.1" west longitude. Elevation of the site is approximately 400 feet above sea level.

3.2 Background

The Center was constructed and activated as the Fort Simcoe Civilian Conservation Center in 1965, occupying 160 acres of land that were developed in the same year. The property has approximately 167,833 gross square feet (GSF) in 26 buildings and 10,831 GSF in 22 structures (DOL 2019a). The Fort Simcoe Civilian Conservation Center campus is owned by and leased from the Confederated Tribes and Bands of the Yakama Nation, and it is federally controlled by the U.S. Department of Agriculture (USDA) Forest Service, Okanogan-Wenatchee National Forest (Dawson and Bennett 2011). The Fort Simcoe Civilian Conservation Center was constructed by the Bureau of Indian Affairs (BIA) under the Economic Opportunity Act of 1964 (BIA 1965a, 1965b; Storey 2013). The BIA provided oversight for regional construction contractors (BIA 1965a, 1965b). The Center was operated by the U.S. Department of Interior, Bureau of Reclamation from 1965 until 2008 (DOL 2019a).

Fort Simcoe Historical State Park is located on adjacent parcels, east of the Center. Fort Simcoe was established in 1856 as a direct result of the Yakama Indian War in the late 1850s (Whisman 1971). With the end of the Yakama Indian War, Fort Simcoe was turned over to the Department of Indian Affairs in 1859 and became the Yakama Indian Agency (1859-1923) (Becker and Wilma 2003; Whisman 1971). From 1860 to 1922, Fort Simcoe acted as a government-run boarding school for Native American children. The forced assimilation of local Native children has come to be viewed by historians as an act of cultural genocide (Meyers 2019). Native children were given Anglo-Catholic names and were forced to live a heavily regimented life which included manual labor, classroom study, and evening prayers. The school eventually closed in 1922, when the Yakama Indian Agency relocated to Toppenish (Meyers 2019). In 1956, Fort Simcoe became a state park and in 1974, was listed on the National Register of Historic Places (Becker and Wilma 2003; Whisman 1971).

The Fort Simcoe Civilian Conservation Center provides career technical training in several vocational trades including the following:

- Carpentry
- Auto Repair
- Heavy Machine Mechanic
- Heavy Machine Operator
- Heavy Truck Driver
- Brick Masonry

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

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

3.3 Project Purpose

The purpose of the Proposed Action Alternative is to reestablish water treatment processes for the potable water supply at the Fort Simcoe Civilian Conservation Center for domestic drinking water purposes.

3.4 Project Need

The proposed project is needed because the existing system has outlived its useful life, and water main breaks are becoming more common, costing significant amounts of limited maintenance dollars. Additionally, the current system does not provide adequate fire suppression flows to the new dormitories, built in 2010. Upgrading the size of the lines and providing a secondary means of piping would provide increased protection for those buildings that have sprinklers, and would reduce service disruptions.

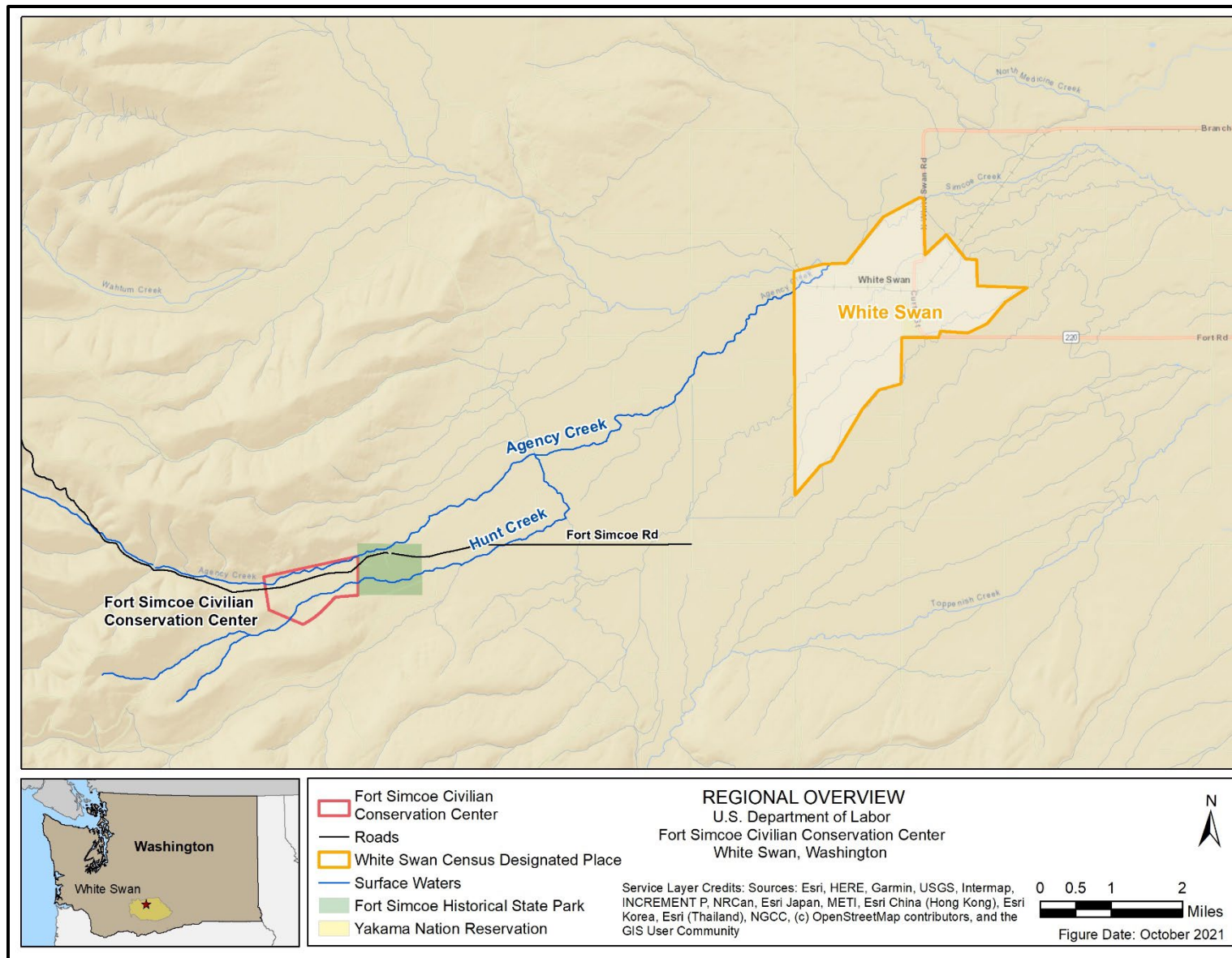


Figure 1. Regional Overview

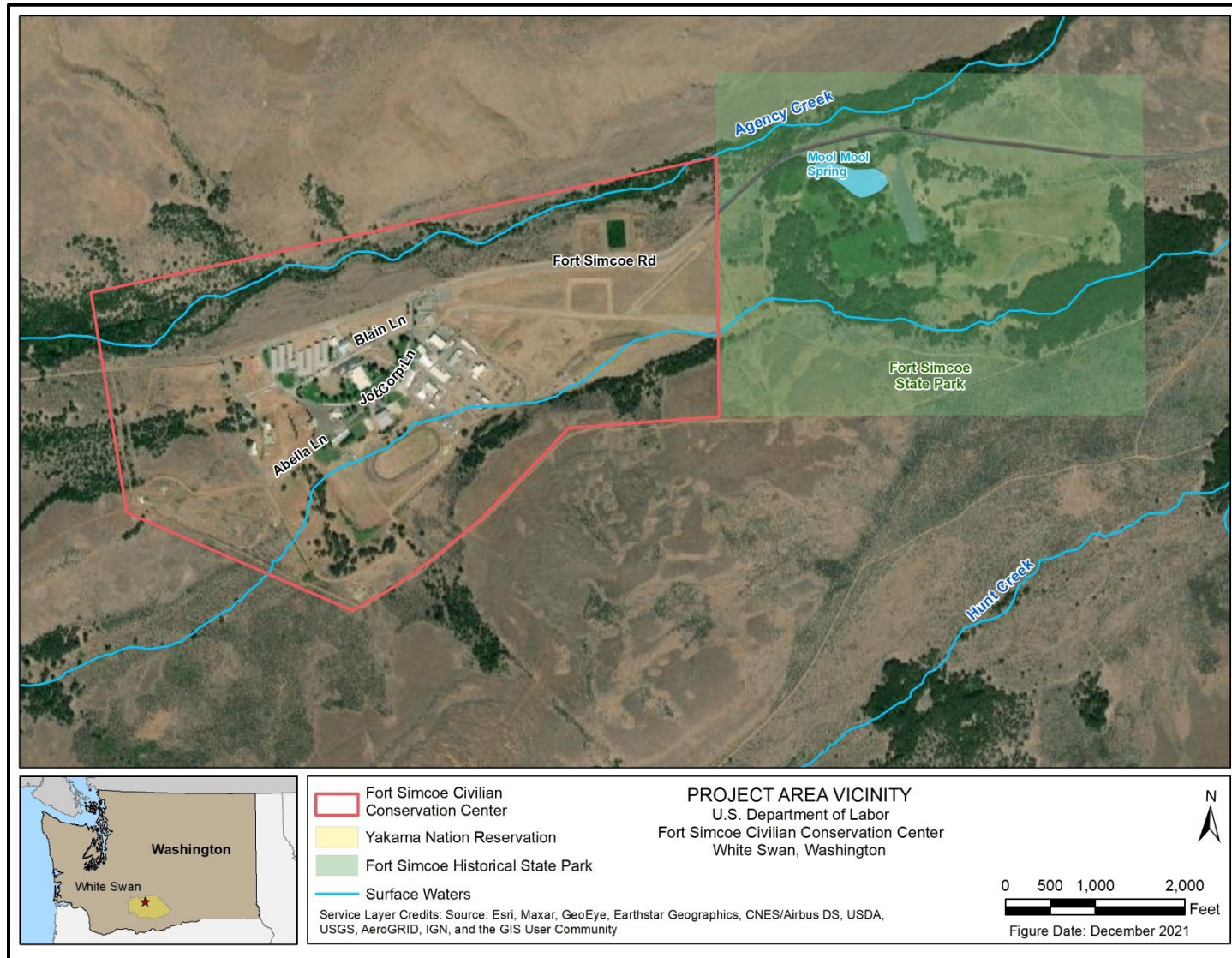


Figure 2. Project Area Vicinity

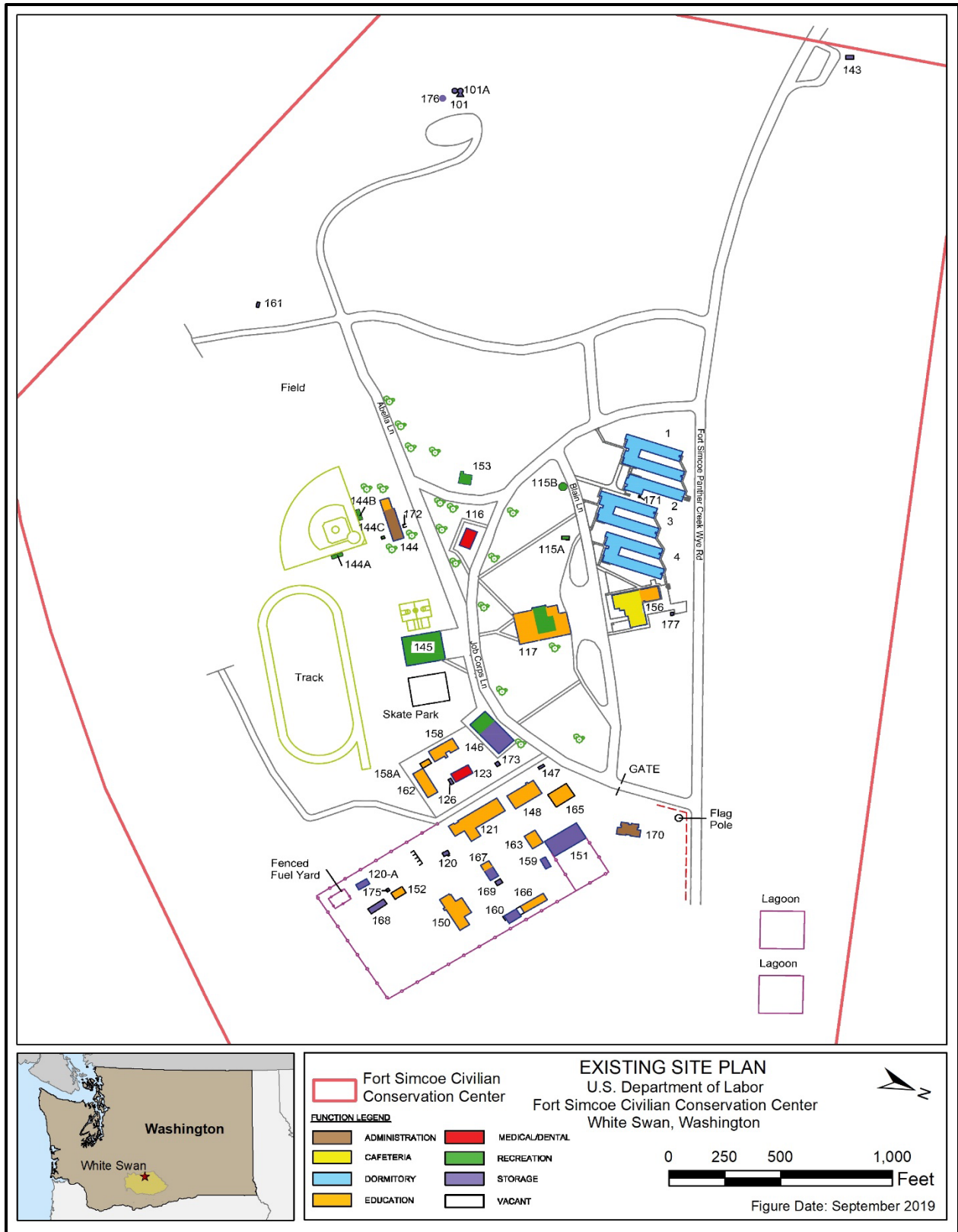


Figure 3. Fort Simcoe Civilian Conservation Center Existing Site Plan (DOL 2019a); North is at Right Bottom of Figure

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

The No Action Alternative consists of the continued use of the existing water supply system at the Fort Simcoe Civilian Conservation Center in its current condition. The proposed replacement of the water distribution system would not occur.

4.2 Proposed Action Alternative

The Proposed Action Alternative of water system improvements at the Fort Simcoe Civilian Conservation Center consists of:

- Construct 2,000 linear feet of new water line in open trench excavation.
- Pipe burst 8,600 linear feet of existing 4-inch Transite or asbestos-cement pipe. All Transite pipe, would be left in place with the exception of pipe junctions which would be removed.
- Install new well pump controls at each of the three pump houses, to automate the shared pumping duties between all three wells for water storage.
- Install fifteen (15) 6-inch gate valves and one (1) 8-inch gate valve.
- Install seven (7) backflow prevention valves with meter boxes.
- Install seven (7) fire hydrant assemblies with gate valves.

New distribution waterlines excavated in open trenches would be 42 inches deep. Existing Transite pipe would be abated in those areas where intersecting pipes connect and would be removed. The segments of the distribution system that are to be replaced would use pipe bursting technology, where the new pipe would be placed in the void of the burst or enlarged existing pipe alignment. Most of the water line replacement construction would occur within existing and previously disturbed water line trenches. An optional 6-inch water line would be located along the entrance road and Fort Simcoe Road also within previously disturbed road right-of-way. New water line trenching would occur in the southeastern area of the Center, in and around existing buildings and structures, an area previously disturbed during the 1965 construction of the Fort Simcoe Civilian Conservation Center. A schematic of the proposed water line replacement work is provided in Figure 4.

Work would include minor roadway and landscaping removal, excavation for access to pipelines, and trenching for pipeline replacement. Areas where water pipelines would be replaced would be back filled, leveled, and reseeded or roadways repaired.

Water pipeline construction activities would involve movement of heavy equipment at the Fort Simcoe Civilian Conservation Center property, likely consisting of two to three excavators, dump trucks for transporting trench bedding to the site, trench compaction equipment and other

associated heavy utility construction equipment. Construction activities would occur during daytime hours only. The expected length of time for construction would be approximately two to three months.

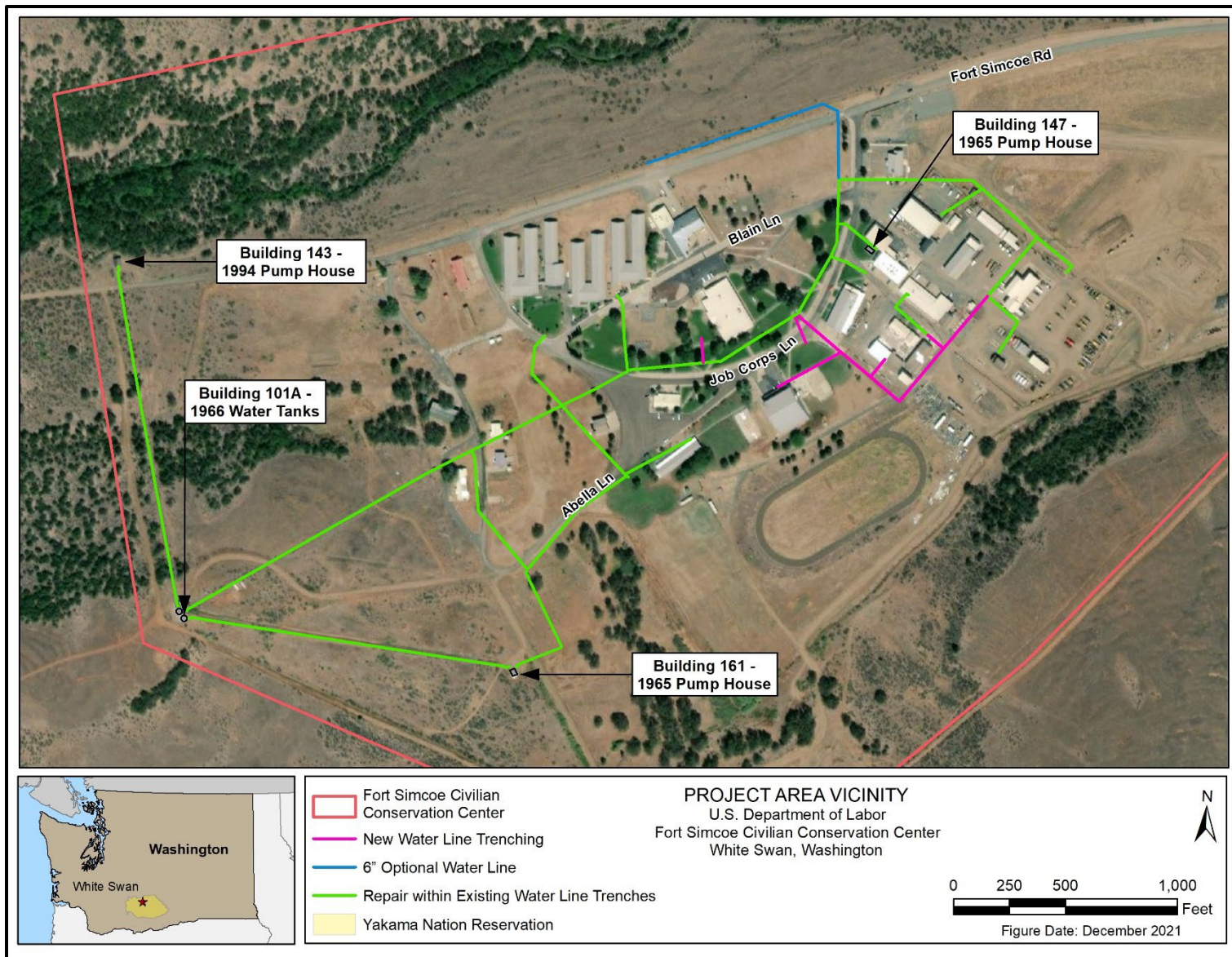


Figure 4. Proposed Action Alternative for Replacement of Water Pipelines at Fort Simcoe Civilian Conservation Center

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.

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

5.1 Impact Analysis Methods

An environmental impact is defined as a change in a resource from the existing environmental baseline conditions caused by or resulting from one of the project alternatives. Impacts may be determined to be beneficial or adverse and may apply to the full range of natural, aesthetic, cultural, and economic resources of the property and its surrounding environment. The term “significant”, as defined in Section 1508.27 of the Regulations for Implementing NEPA (40 CFR 1500), requires consideration of both the context and intensity of the impact evaluated. Significance can vary in relation to the 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, socioeconomics, and utilities. 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) required the U.S. Environmental Protection Agency (USEPA) to establish a series of National Ambient Air Quality Standards (NAAQS) for air quality pollutant levels for six criteria pollutants. Current standards for these pollutants are available on the USEPA website (<https://www.epa.gov/criteria-air-pollutants/naaqs-table>). Areas where ambient concentrations of a given pollutant are below the applicable ambient standards are designated as being in “attainment” for that pollutant. An area that does not meet the NAAQS for a given pollutant is classified as a “non-attainment” area for that pollutant. Areas where pollutants were once designated as nonattainment but are now meeting and maintaining the standard are redesignated as a “maintenance area.”

The Proposed Action Alternative would occur within Yakima County, Washington, which is designated as “in attainment” for all USEPA NAAQS criteria pollutants (USEPA 2021). A portion of Yakima County, the City of Yakima’s central business district, was identified as a maintenance area for Carbon Monoxide (1971) until December 2002, and Yakima City was in a maintenance area for Particulate Matter (PM10) (1987) until March 2005 (USEPA 2021). Because there are no current maintenance areas within Yakima County, the project is not subject to 40 CFR, Part 93 Federal General Conformity Rule regulations.

All applicable construction and operation permits would be obtained as required by Washington state laws and regulations. Permits would be obtained before the project begins. Therefore, there would be no impacts to air quality and no further analysis or documentation of air quality is required.

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 Fort Simcoe Civilian Conservation Center property is adjacent to the Agency Creek riparian area, which consists of trees, shrubs, and vegetation surrounding a perennial river. The footprint of the Proposed Action Alternative, however, does not encompass or encroach upon this potential ecologically critical area. The Proposed Action Alternative would take place within areas previously disturbed for existing waterlines or within the developed portion

of the Center where there are multiple buildings, roadways, and outdoor facilities with grass-covered lawns and some tree cover. No ecologically critical areas have been identified in the project area; therefore, this topic was dismissed from further consideration.

Floodplains and Floodways. The Federal Emergency Management Agency [FEMA] Flood Insurance Rate Map for Floodplain Panel 53077C1750D, which contains the Fort Simcoe Civilian Conservation Center, indicates that the entire area of the floodplain panel is located within a single flood zone (FEMA 2009). The project area is situated within an area of minimal flood hazard and probability for flooding is considered low (DOL 2019b). This topic was dismissed as the project area is not located within a special flood hazard area.

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. According to the Natural Resources Conservation Service (NRCS) web soil online mapping tool, the soils map is restricted (USDA 2021a). Soil surveys from 1986 by the Washington Division of Geology and Earth Resources for the Toppenish Quadrangle determined that the soils in a large area around the Fort Simcoe Civilian Conservation Center are: Alluvium, stream deposits of silt, sand, and gravel; and Grande Ronde Basalt – Upper flows of normal polarity, unnamed basalt flows that are generally fine-grained and petrographically non-distinct (Walsh 1986). The Fort Simcoe Civilian Conservation Center is situated south of Agency Creek. Soil information from the creek approximately 1.5 miles east of the Center is available from NRCS. Three soils are present on either side of the creek: Logy cobbly silt loam, Simcoe silt loam, and Rock Creek very stony loam (USDA 2021a). When correlated with the 1986 surveys, the soils within the Fort Simcoe Civilian Conservation Center are most likely of a similar nature. Logy cobbly silt loam and Simcoe silt loam are both prime farmland, if irrigated (USDA 2021b).

While implementation of the Proposed Action Alternative will occur on soils potentially designated as farmland by the USDA, the Proposed Action Alternative fits with the mission of the Job Corps. Additionally, agriculture is not a function that is present on campus. Based on the Fort Simcoe Civilian Conservation Center function and because the project area for the replacement of the water distribution system is located in a previously disturbed and developed area, the project area is not considered to be ideal for agricultural use even though it may contain farmland soils. There would be no impact to prime and unique agricultural lands and this topic was dismissed from further consideration.

Soils and Geology. As stated previously, the project area resides on land which does not have public information on soil composition (USDA 2021a). According to NRCS, there are three soils are present on either side of Agency Creek in the vicinity of the Fort Simcoe Civilian Conservation Center.

- Logy cobbly silt loam is found along alluvial flats and is found between 0 to 12 inches in depth. At further depths, up to 60 inches, the soil series turns gravelly and sandy. Logy cobbly silt loam has a slope ranging from 0 to 5 percent, is well-drained, is found at elevations between 590 and 1,380 feet, and receives less than 10 inches of mean annual precipitation. It has a moderately high to high capacity for transmitting water (0.57 to 1.98 inches/hour) (USDA 2021a).
- Simcoe silt loam is found along hillslopes between 0 to 8 inches in depth. At further depths, up to 41 inches, the soil turns to silty clay loam and unweathered bedrock. Simcoe silt loam has a slope ranging from 0 to 2 percent, is well-drained, is found at elevations between 1,080 and 1,380 feet, and receives 8 to 12 inches of mean annual precipitation. It has a moderately high capacity for transmitting water (0.20 to 0.57 inches/hour) (USDA 2021a).
- Rock Creek very stony loam is a very small proportion of the area and occurs at the upper slopes in the area (USDA 2021a). However, the Center is on the alluvial plain and most likely does not contain this soil.

The Proposed Action Alternative would have little to no measurable impact on the soils or geology at the project area because the soils present were compacted and disturbed from previous leveling, grading, installation of underground utilities, and construction of roads, buildings, and structures during original development of the facility in 1965. Water pipeline and hydrant replacement activities associated with the Proposed Action Alternative would involve excavation of trenches up to four feet deep, backfilling, grading, and movement of heavy equipment within the project area. These activities would disturb the soil, increasing the potential for soil erosion by wind or runoff. However, little to no measurable impact would occur because appropriate sediment control measures would be applied in accordance with local regulations to reduce and control erosion. Geological hazards such as sinkholes, caves, mines, or quarries are not known to exist on or adjacent to the project area (Yakima County 2021).

Surface Water and Hydrology. Agency Creek, a perennial stream flowing east, is located approximately 500 feet north of the Fort Simcoe Civilian Conservation Center. An unnamed, intermittent stream that flows east towards Hunts Creek and bisects the southern portion of the Center property adjacent to the track field. The Center is situated within the Agency Creek watershed boundary (HUC 12-170300030303) (U.S. Geological Survey [USGS] 2021).

The Proposed Action Alternative would not change the current or historical drainage patterns for the area. Excavation for the Proposed Action Alternative would not occur deep enough to affect groundwater. During construction activities, best management practices would be followed to avoid or minimize erosion and release of sediments that could enter surface waters through stormwater runoff. Therefore, the Proposed Action Alternative would have little to no measurable impact on surface waters and hydrology and no further analysis is required.

Wetlands. Wetlands are areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and in normal conditions do support, a

prevalence of vegetation adapted for life in saturated soil conditions. Per U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) mapping, there are no wetlands at the Fort Simcoe Civilian Conservation Center (USFWS 2021a). The Fort Simcoe Civilian Conservation Center has two lagoons that are part of the Center’s on-site sanitary sewer system (DOL 2019a). These lagoons are classified by the USFWS NWI mapping as freshwater pond habitat (PUBHx) measuring 0.50 acres and 0.79 acres (USFWS 2021a). Activities under the Proposed Action Alternative would not encroach on these lagoon treatment ponds and would not impact this portion of the sanitary sewage system. 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 U.S. Fish and Wildlife Service (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 the official species list generated for the project in IPaC (USFWS 2021b), the federally-listed threatened species identified in Table 2 are known or expected to occur on or in the vicinity of the Fort Simcoe Civilian Conservation Center.

Table 2. Federally Listed Species near the Fort Simcoe Civilian Conservation Center

Common Name	Scientific Name	Status
Yellow-billed Cuckoo	<i>Coccyzus americanus</i>	FT
Bull Trout	<i>Salvelinus confluentus</i>	FT
Monarch Butterfly	<i>Danaus plexippus</i>	Candidate

Notes: FT = Federally threatened. Source: USFWS 2021b

The species of birds identified in Table 3 are protected under the Migratory Bird Act (16 USC 703-712) and have the potential to occur in the project area (USFWS 2021c). Six (6) of the migratory birds that have the potential to occur in the project area are listed as Birds of Conservation Concern (BCC). Birds designated as BCC represent those species in need of the highest conservation priority (USFWS 2021d). Bald and golden eagles are also protected under the Bald and Golden Eagle Protection Act (16 USC 668-668c).

The proposed project area is not within any designated critical habitat (USFWS 2021b). While the project area includes limited tree cover and does not provide suitable habitat for the listed species identified in Table 2. Sagebrush and other shrubs that could be suitable habitat for certain migratory bird species may be present within the natural open spaces at the Center despite earlier disturbance from construction. Although daytime construction noise may temporarily disturb or displace nesting, sufficient similar habitat is available within the vicinity of the project area and it is expected that individuals would return to the nesting site once construction noise has ceased. As such, impacts resulting from construction would be temporary; conditions would return to normal once construction activities were completed.

There would be no impact on federally-listed threatened or endangered species or migratory birds as a result of the Proposed Action Alternative. Per the guidance received from USFWS Washington Fish and Wildlife Office (USFWS 2021b), concurrence is not

Table 3. Migratory Birds near the Fort Simcoe Civilian Conservation Center

Common Name	Scientific Name	Bird of Conservation Concern
Bald Eagle	<i>Haliaeetus leucocephalus</i>	No
Cassin's Finch	<i>Carpodacus cassinii</i>	Yes
Evening Grosbeak	<i>Coccothraustes vespertinus</i>	Yes
Lewis's Woodpecker	<i>Melanerpes lewis</i>	Yes
Long-eared Owl	<i>Asio Otus</i>	Yes
Olive-sided Flycatcher	<i>Contopus cooperi</i>	Yes
Sage Thrasher	<i>Oreoscoptes montanus</i>	Yes

Source: USFWS 2021c

required for no impact determinations. No further analysis of this topic is required.

Vegetation. The project area consists of a combination of natural open space with several mowed grass lawns and some ornamental trees and shrubs. The Proposed Action Alternative may involve removal of some vegetation for excavation in the existing landscaped areas of the Fort Simcoe Civilian Conservation Center campus. If any grass and trees are removed as part of the Proposed Action Alternative, they would be replanted upon completion of the water system improvements. Excavation within natural open space areas would occur mostly within areas previously disturbed for construction of the existing waterlines; however, removal of some shrub-steppe vegetation may be required. Shrub-steppe communities are found throughout areas surrounding the project. Because of the previous disturbance from the existing waterline and the small area of shrub-steppe vegetation that would be affected by the Proposed Action Alternative, there would be little to no measurable impact to vegetation and this topic does not require further analysis.

Wildlife. The project area includes a combination of natural shrub-steppe vegetation and maintained grass lawns. Shrub-steppe habitats in the state of Washington support over 200 species of birds, 30 species of mammals, and numerous species of reptiles, amphibians, and insects. Species commonly associated with shrub-steppe habitats include mule deer, western fence lizards, burrowing owls, and northern Pacific rattlesnakes (Washington Department of Fish and Wildlife [WDFW] 2021). The lack of fencing around the Center opens the project area to trespass from free range livestock, bears, and horses (DOL 2019a).

Proposed excavation for the waterline replacement and installation of a new waterline may displace individual animals within the project footprint and adjacent areas; however, this is not expected to result in population level effects, as a small area of natural vegetation would be affected and sufficient habitat is available within the vicinity of the site. Construction would occur during daylight hours and impacts resulting from

construction would be temporary; conditions would return to normal once construction activities were completed. Therefore, the Proposed Action Alternative would have little to no measurable impact on wildlife and no further analysis of this topic is required.

Land Use. The project area is located in a remote region of the Yakima County, Washington on land owned by the Confederated Tribes and Bands of the Yakama Nation. Adjacent land consists of undeveloped, open range land, with the exception of the Fort Simcoe Historical State Park about a mile east of the Center (Figure 3). Therefore, there would be no impacts to compatible land use. Because land use would not change and would be consistent with existing educational uses, this topic was not carried forward for analysis.

Energy Requirements and Conservation Potential. Executive Order (EO) 13834 requires federal agencies to efficiently operate federal facilities. The EO addresses requirements for federal facilities in energy, fleet, buildings, and acquisition management. Currently, only parts 6, 7, and 11 are active (EO 13990). The Proposed Action Alternative includes replacement of the water line distribution system to control and meter water flow and water pressure, and correct water leaks. As of 2019, the Fort Simcoe Civilian Conservation Center was not meeting its energy use reduction targets, using 4.6 percent more energy than the previous year (DOL 2019a). The current use of water is not metered and significant subgrade leaks have formed in several areas of the Center, forming swampy areas. The No Action Alternative would have no significant impact on energy requirements but the impacts from the current water distribution system would be readily apparent and appreciable (moderate impact). The Proposed Action Alternative would conserve more energy and use less water than the No Action Alternative and any impacts would be beneficial. 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 not result in an increase in the number of vehicles entering and exiting the Center during daily operations. During construction, the

Proposed Action Alternative would include the use of some heavy equipment, typical of a construction project of this type. All applicable construction and operation permits would be obtained as required by the State of Washington. Therefore, the Proposed Action Alternative would result in little to no measurable impact to regional climate change and this topic was not carried forward for analysis.

Hazardous and Toxic Substances. The Fort Simcoe Civilian Conservation Center uses a commercial hazardous waste service, Safety Kleen, to dispose of hazardous waste generated at the Center (DOL 2019b). A hazard waste storage (Structure 168) is located in the southwest portion of the Center within the fence fuel yard. Other non-hazardous substances such as oil are stored in the fenced-off area. The Fort Simcoe Civilian Conservation Center uses a commercial waste service, Yakima Waste Inc., to dispose of solid waste generated at the Center (DOL 2019b).

There are two underground storage tanks (USTs) and four aboveground tanks (ASTs) currently at the Center. Both USTs, which are located near Buildings 116 and 146 and have previously stored heating oil, have been abandoned (DOL 2019b). Of the four ASTs located near Building 120A that store either gasoline or diesel fuel, one gasoline AST has been abandoned (DOL 2019b). A search on the Washington State Department of Ecology's (WDOE) Cleanup and Tanks database found no record of clean-up activities conducted on Center property (WDOE 2020). The USTs and ASTs will not be impacted by the Proposed Action Alternative.

Hazardous materials such as lead based paint (LBP), asbestos containing materials (ACM), and polychlorinated biphenyls (PCBs) were commonly used in building materials prior to the mid to late 1970s when they became banned for that use. Because the site has 14 buildings and 3 structures built in 1965-1966, it is likely that these materials are on site. LBP is commonly encapsulated in older buildings and would only become an issue during renovation or demolition that would create LBP dust emissions. Seven buildings on the property contain asbestos floor tiles according to the asbestos survey conducted August 10, 1993 (DOL 2019a). Radon testing occurred in 1990 and none of the results were above the USEPA action level of 4 picoCuries per liter (pCi/L) (DOL 2019b). All transformers were inspected August 10, 1993, and 19 transformers were found to contain PCBs (DOL 2019b). All PCB-contaminated transformers were labeled. However, PCBs were also commonly found in caulking and sealants especially around window and door frames. Buildings potentially containing LBP, ACM, or PCBs would not be impacted by the Proposed Action Alternative.

The Proposed Action Alternative would pipe burst 8,600 linear feet of existing 4-inch Transite or asbestos-cement pipe and, with the exception of the pipe junctions, the Transite pipe would be left in place. The Transite pipe junctions would be removed and the asbestos-cement pipe would be appropriately contained, removed off-site, and properly disposed of at an appropriately licensed landfill.

Required removal and disposal of the 4-inch Transite pipe junctions would be conducted in accordance with federal (40 CFR Part 61 Sub-part M) and state (Washington State Administrative Code [WAC] 296-65) (WAC 2021) regulations for handling this type of

asbestos-cement pipe. Activities associated with the Proposed Action Alternative would result in the generation of a small amount of non-hazardous construction waste. All debris generated during these activities would be transported off-site and disposed in compliance with applicable solid waste handling laws and regulations. Therefore, there would be little to no measurable impact resulting from the presence of hazardous and toxic substances and this topic was not carried forward for analysis.

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 Fort Simcoe Civilian Conservation Corps property is adjoined by sparsely vegetated land, undeveloped open range land, and minimally forested land belonging to the Fort Simcoe Historical State Park. Sensitive noise receptors in the vicinity of the proposed project area are the Fort Simcoe Civilian Conservation Center dormitories.

Under the Proposed Action Alternative, equipment used in demolition, site preparation, and construction could at times generate noise above ambient levels. Estimated noise levels for heavy construction equipment range from 75 to 105 decibels (dB) at 50 feet from the source and the sound intensity generally decreases 6 dB with each doubling of the distance from the source (USEPA 1971). 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. Because noise impacts would be of short duration and only during daytime hours, there would be little to no measurable impact to noise from the Proposed Action Alternative and this topic was not carried forward for analysis.

Indian Trust Resources. Native Americans own Indian trust assets. The United States holds these lands in trust. Requirements are 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 as the Fort Simcoe Civilian Conservation Center is located within the Confederated Tribes and Bands of the Yakama Nation Reservation and all resources are owned outright by the Nation; therefore, this impact topic was not further assessed.

Transportation. The Proposed Action Alternative may require temporary re-routing of automobile traffic within the Fort Simcoe Civilian Conservation Center during work occurring within or adjacent to roadways. The Fort Simcoe Road, a remote road, is the main access road to the Center. Traffic within the Center is minimal because students primarily walk to the buildings on the residential campus. The use of temporary detours would adequately facilitate movement of traffic with negligible impacts. The Proposed Action Alternative would not increase the population of students or faculty on the campus so there would be no increase in daily traffic to the campus or on the campus. Therefore, the Proposed Action Alternative would have little or no measurable impact on transportation or traffic patterns and this topic was not carried forward for analysis.

5.2.2 Impact Topics Retained for Detailed Analysis

Three impact topics were retained for further analysis as further described 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), due to the sensitivity of resources known to be present (e.g., low-income populations), or due to the complexity of the existing conditions (e.g., utilities) within the project area or surrounding areas. Impact topics assessed include:

- Cultural Resources (see Section 5.3),
- Socioeconomics (see Section 5.4), and
- Utilities (see Section 5.5).

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 Confederated Tribes and Bands of the Yakama Nation Tribal Historic Preservation Office (THPO), on July 7, 2022 (Appendix A). The Area of Potential Effects (APE) was established in coordination with that office.

5.3.1 Affected Environment

The APE for cultural resources for the Proposed Action Alternative at the Fort Simcoe Civilian Conservation Center consists of the leased boundary encompassing all 160 acres of the Center (Figure 5) although the ground disturbing activities will occur in very narrow linear corridors.

Data collection was conducted using the online DAHP Washington Information System for Architectural and Archaeological Records Data (WISAARD) system and the National Park Service, NRHP interactive map. Within a one-mile radius of the project area, the site files search identified no previous cultural resources investigations and one NRHP-listed resource: the Fort Simcoe Historical State Park (Whisman 1971). Several trail alignments from the General Land Office (GLO) maps are present in the WISAARD system; two discrete trails, trending east/west, traversed the Fort Simcoe Civilian Conservation Center.

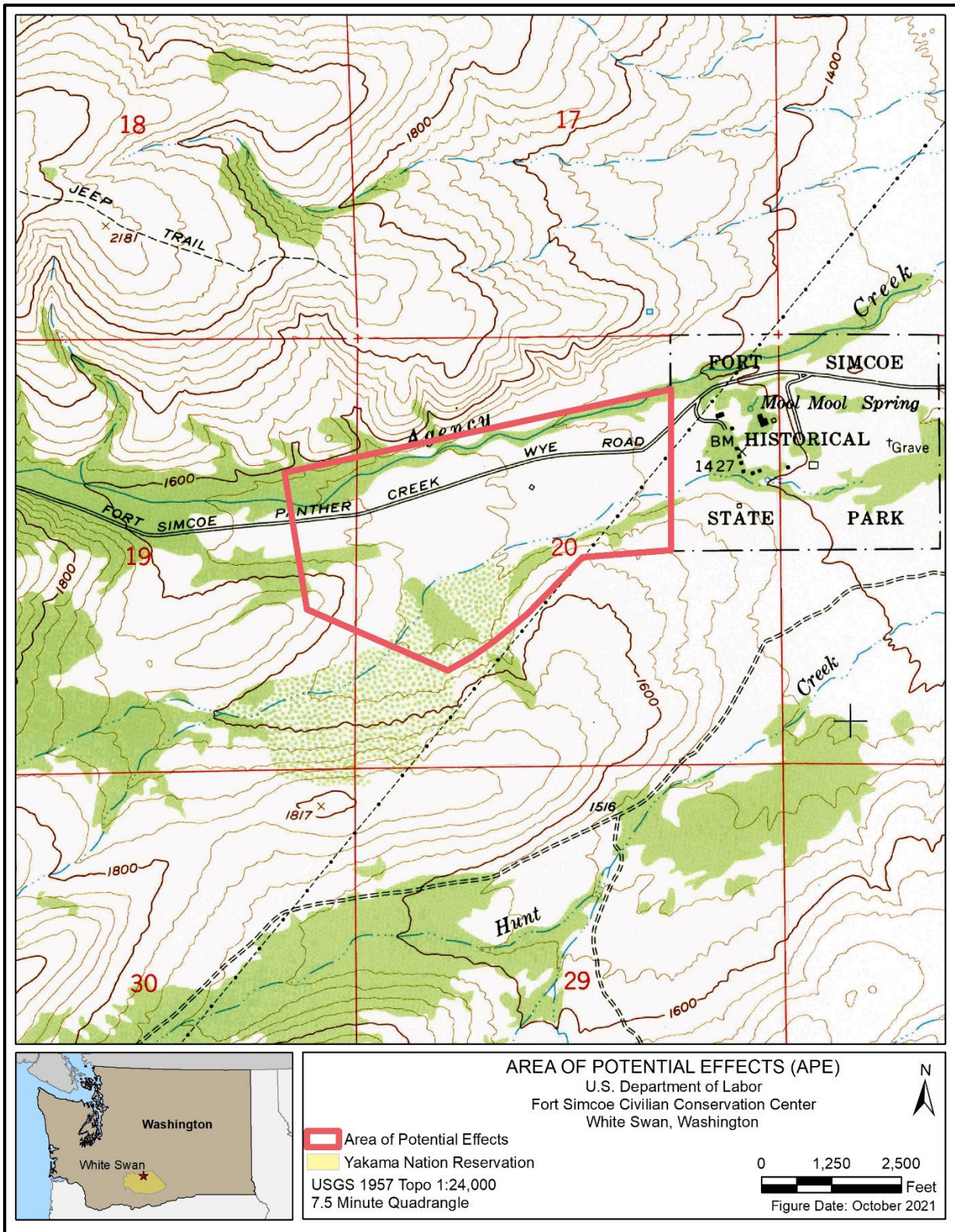


Figure 5. Area of Potential Effects (APE)

5.3.1.1 Archaeological Resources

No previously identified archaeological sites occur in the APE; however, the predictive model layer of WISAARD identifies the project area as very high risk for containing archaeological sites. The original Fort Simcoe was constructed on a trail between the Yakima Valley and the Confederated Tribes and Bands of the Yakama Nation's traditional fishing areas on the Columbia River and the area was a historic camping area for the Yakamas, who called it Mool-Mool or bubbling water. Mool-Mool spring is located within the Fort Simcoe Historical State Park (Figure 5). The name 'Simcoe' is derived from the Sahaptin word Sim-ku-ee or saddle-like dip in a hill (Becker and Wilma 2003).

The APE was extensively disturbed from prior development of the Fort Simcoe Civilian Conservation Center in 1965, which included grading and leveling for construction of roadways and buildings, excavation for utilities, including the existing underground pipelines for the water distribution system on campus. No intact archaeological resources or Native American trail remnants are likely to occur within the previously disturbed campus center or within the footprint of the existing water lines extending to the water tanks and to the two pump houses (Figure 4).

5.3.1.2 Architectural Resources

The Fort Simcoe Civilian Conservation Center was established in 1965 on undeveloped tribal land west of the Fort Simcoe Historical State Park, listed on the NRHP in 1974 (Whisman 1971). The Bureau of Indian Affairs oversaw the construction of the Center in 1965 (BIA 1965a; Storey 2013). Although the Bureau of Reclamation used standardized plans for residences associated with large water and dam construction projects from 1902 to the 1940s, the Bureau of Reclamation also constructed Civilian Conservation Corps (CCC) camps based on standard plans developed by the U.S. Army and adapted to meet local needs (Pfaff 2007:176, 2010).

Fourteen buildings and three structures, built in 1965, are still extant at the Fort Simcoe Civilian Conservation Center, including Structures 147 and 161, both pump houses. The water tanks (Structure 101A) were installed in 1966 (DOL 2019b). The buildings are mostly rectangular and side-gabled with brick water tables; several buildings are front-gabled with overhanging eaves (DOL 2019b). Two original dormitories were demolished after June 2009 (Google Earth Pro 2009, 2011). None of these buildings have been evaluated for eligibility for listing in the NRHP.

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 coordinated with the Confederated Tribes and Bands of the Yakama Nation in letters dated February 11, 2022 and July 7, 2022 (Appendix A). Based on the preliminary literature review, no properties of religious

or cultural significance to Native American tribes are likely 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, no changes to existing conditions from improvements to the existing water distribution system would occur. No archaeological sites are likely to be present (based on extensive prior ground disturbance), no NRHP-eligible architectural resources would be affected, and no intrusion on Native American resources would occur. No impacts to cultural resources would occur under the No Action Alternative.

5.3.2.2 Proposed Action Alternative

Under the Proposed Action Alternative, most of the water line replacement will occur within existing and previously disturbed water line trenches. An optional 6-inch water line would be located along the entrance road and Fort Simcoe Road also within previously disturbed road right-of-way. New water line trenching would occur in the southeastern area of the Center, in and around existing buildings and structures, an area previously disturbed during the 1965 construction (Figure 4). No impacts to archaeological resources are expected because there is limited potential for archaeological resources to occur within the APE because of previous ground disturbance from prior development of the Fort Simcoe Civilian Conservation Center in 1965.

The Proposed Action Alternative would repair the water pipe lines within the existing water line trenches to the water tanks (Structure 101A), to the pump house southwest of the main campus (Structure 161), and to the pump house in the vocational area (Structure 147); however, no alterations to the water tanks or pump houses would occur. Water lines serving other 1965 buildings on campus would also be repaired or replaced (Figure 4); however, no modifications to the exterior of any buildings would occur as part of the Proposed Action Alternative. As such, no alterations to any features or aspects of integrity that could contribute to the NRHP eligibility of any previously unevaluated

1965-1966 era buildings would occur. The Proposed Action Alternative would have no impact on architectural resources at the Fort Simcoe Civilian Conservation Center.

No historic properties of religious or cultural significance to Native American Tribes are likely to exist within the proposed project area. Therefore, the Proposed Action Alternative includes no activities that would impact cultural resources.

5.4 Socioeconomic Environment

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

5.4.1 Affected Environment

In this section, current socioeconomic conditions with potential to be affected by the Proposed Action Alternative are presented.

5.4.1.1 Economic Development

Local Economic Activity. The Fort Simcoe Civilian Conservation Center has approximately 87 students between 16 and 24 years of age that live on the Center, and approximately 25 students are non-residents (DOL 2019a). Yakima County's labor force in 2019 was 113,442 persons, with an unemployment rate of 6.4 percent (U.S. Census Bureau [USCB] 2020a). Around fifty-seven (57) percent of the county employment is distributed among four industrial sectors: educational services, health care, and social assistance (21.9 percent); agriculture, forestry, fishing and hunting, and mining (16.5 percent); retail trade (10.3); and manufacturing (8.7 percent) (USCB 2020a).

Economic activity from 2009-2019 has been steady with no major shifts in jobs between industries. Yakima County's economy depends heavily on the forestry and livestock, dairies and the growing, storage and shipping/processing of deciduous tree fruits (apples, cherries, pears, etc.) (Meseck 2020). Non-farm jobs have a slower growth rate in Yakima County, with job growth in the ten-year period of 2011 to 2019 being consistently lower in the local labor market compared to Washington's labor market (Meseck 2020). During previous economic downturns, the county fared pretty well overall because the strong agricultural industry can moderate the larger job losses and slower growth of the nonfarm jobs (Meseck 2020). However, the ongoing COVID-19 pandemic has severely impacted the local economy of Yakima County as the unemployment rate in the County reached 7.2 percent in September 2020. The unemployment rate had rebounded to 4.0 percent by September of 2021 (Employment Security Department [ESD] 2021).

Regional Economic Activity. According to the Federal Reserve, economic activity in the Twelfth District, which includes Washington state, experienced a modest contraction between the mid-May and June 2020. Employment activity increased slightly as rehiring activities commenced while wages remained stable. The sales of retail goods increased moderately while the activity for providers of business and consumer services continued

to contract severely. Manufacturing activity was mixed and agricultural conditions remained weak. Overall lending activity saw an increase (Federal Reserve 2020).

5.4.1.2 Population Demographics

The Fort Simcoe Civilian Conservation Center is located within Census Tract 9400.03 in Yakima County, Washington. The area, defined by the USCB for statistical purposes only, was chosen for study as it encompasses Fort Simcoe Civilian Conservation Center in addition to the Town of White Swan, the closest center of population to the Civilian Conservation Center (USCB 2011).

According to the 2015-2019 American Community Survey (ACS) data, the population of Census Tract 9400.03 is 3,315 with 71.1 percent identified as minorities (USCB 2020b). The median household income for Census Tract 9400.03 was \$49,688 (USCB 2020c). The percentage of persons living below poverty was reported at 18.6 percent (USCB 2020d).

5.4.1.3 Housing

The median value of an owner-occupied housing unit in Census Tract 9400.03 in 2019 was \$165,100 (Table 4). This is 6.1 percent less than the median value of owner-occupied housing in Yakima County, which has a median average of \$175,900. Approximately 62 percent of housing units in Census Tract 9400.03 are owner-occupied (USCB 2020e).

Table 4. Housing Characteristics, 2019

Jurisdiction	Total Housing Units	Percent Vacant	Percent Owner Occupied	Median Value Owner Occupied	Median Rent Renter Occupied	Median Household Income
Census Tract 9400.03	1,095	7.1	62	\$165,100	\$624	\$49,688
Yakima County	88,698	6.4	62.7	\$175,900	\$825	\$51,637
Washington	3,202,241	8.2	63.1	\$387,600	\$1,359	\$78,687

Source: USCB, 2015-2019 American Community Survey 5-Year Estimates, Selected Housing Characteristics, Median Household Income (USCB 2020e, 2020c)

A search on the National Association of Realtors website for property for-sale within the zip code 98952 showed two homes for sale. One had a list price over \$250,000; the other was over 60 acres of vacant land. There were 128 homes were available within 20 miles of Fort Simcoe Civilian Conservation Center (National Association of Realtors 2021).

5.4.1.4 Community Services

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

Education. The Mount Adams School District (MASD) #209 encompasses three schools serving students from kindergarten through 12th grade: Harrah Elementary School,

Mount Adams Middle School, and White Swan High School (MASD 2021). The closest school facility to the Fort Simcoe Civilian Conservation Center is White Swan High School, located 8.3 miles away.

In Census Tract 9400.03, approximately 36.1 percent of the population 25 years or older have a high school diploma and approximately 10.6 percent have a bachelor's degree or higher; the percentage of high school graduates is higher while the portion of those holding college degrees is lower when compared to 28.1 percent and 16.7 percent in Yakima County, respectively (USCB 2020f).

Health Services. The nearest hospital to the Fort Simcoe Civilian Conservation Center is in Toppenish, Washington, located approximately 28.1 miles east of the Center. The Astria Toppenish Hospital, located at 502 W. 4th Avenue, Toppenish, Washington 98948, is a fully accredited 63-bed community hospital. The hospital offers a 24-hour emergency department and level IV trauma services, intensive care units, 24/7 inpatient physicians, a family maternal center, inpatient and outpatient general, orthopedic surgical services, and cardiac care center (Astria Health 2020).

Law Enforcement. The Yakama Nation Police Department maintains the public safety and sovereignty of the people of the Confederated Tribes and Bands of the Yakama Nation. The Department has a Chief of Police, criminal investigators, patrol officers, game wardens, security guards, and a team of support staff. The station is located at 50 Wishpoosh Rd, Toppenish, WA 98948, approximately 27.1 miles from the Fort Simcoe Civilian Conservation Center (Yakama Nation 2020b).

In recent years, the Yakama Nation Reservation has seen a spike in crime, which has led Yakama tribal leaders to declare a public safety crisis in 2018. The order re-opened the White Swan Tribal Police sub-station and instituted an 8 pm curfew for youth in the White Swan community. The Yakama Nation Tribal Council (YNTC) Resolution has extended punishment for unlawful activity including immediate exclusion, jail time, fines, and suspension of all Treaty-reserved privileges (YNTC 2018).

Fire Protection. The Yakima County Fire District #5 spans 750 square miles in the southern portion of Yakima County. The Fort Simcoe Civilian Conservation Center is supported by Yakima County Fire District #5 White Swan Station 1. The fire station, located at 240 Curtis St, White Swan, WA 98952, has a response time of approximately 15 minutes to the Center (DOL 2019a). The station houses a pumper engine, off-road tender, brush truck, and a transport capable rescue vehicle, and has a staff of 6 volunteers (Yakima County Fire District 5 2020).

While there are fire hydrants on the Fort Simcoe Civilian Conservation Center, some recently installed around new dormitory area, the hydrants are supplied by the same water distribution system as domestic water. As stated in Section 3, the domestic water distribution system on the Center is inadequate and is due for an entire system replacement. The hydrants have never been flow tested for residual pressures (DOL 2019a).

The recent facility study reported fire alarm systems in varying states of deterioration and non-operational states throughout several buildings at the Center. There is a firefighter's storage shed (Structure 169) located within Center property (DOL 2019a).

Recreation. The Fort Simcoe Civilian Conservation Center is situated west of the Fort Simcoe Historical State Park, a 196-acre, day-use heritage site. In 1956, Fort Simcoe Historical State Park was leased to Washington State Parks by the Yakama Nation on a 99-year lease for historic preservation. Fort Simcoe Historical State Park was placed on the NRHP in June 1974 (Whisman 1971). Today, the historic site operates as a day-use facility, offering interpretive tours, a scenic walking path for short hikes, as well as four (4) sheltered and forty-five (45) unsheltered picnic tables. The large open grassy area may host baseball, football, softball and soccer activities (Washington State Parks 2020).

The Fort Simcoe Civilian Conservation Center features several outdoor recreation facilities including a basketball court, a baseball field, and a running track. The Gymnasium (Building 145), adjacent to the basketball court, provides indoor recreation opportunities for residents (DOL 2019a).

5.4.1.5 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 and adverse environmental, economic, social, or health impacts from federal actions and policies on minority and low-income populations or communities.

For environmental justice considerations, these populations are defined as individuals or groups of individuals subject to actual or potential health, economic, or environmental threats arising from existing or proposed federal actions and policies. Low-income, i.e., at or below the poverty threshold, is defined as the median household income for various household sizes. In Yakima County and Census Tract 9400.03, the average household size is three persons (USCB 2020g). In 2019, the median income in Census Tract 9400.03 was \$49,688, compared to \$51,627 in Yakima County (USCB 2020c). Table 6 presents minority and low-income data for area populations.

As referenced in Table 5, nearly 50 percent of the population within Census Tract 9400.03 is American Indian or Alaskan Native because this CT is located within the Confederated Tribes and Bands of the Yakama Nation Reservation. According to the U.S. Census Bureau, the percentage of individuals living below the poverty level in Census Tract 9400.03 was 18.6 percent in 2019, which was slightly higher than values in Yakima County of 17.4 percent (USCB 2020d). This area of Yakima County is particularly vulnerable to homelessness. A 2018 Homeless Point-in-Time count, submitted to the U.S. Department of Housing and Urban Development (HUD), showed that out of 638 respondents who identified as homeless, 48 percent stayed in emergency shelters, 36 percent lacked any shelter, and 16 percent were currently in transitional housing. Of the three areas surveyed, the Middle Valley, which encompasses the Center,

had the second highest level of respondents who identified as homeless (Yakima Valley Conference of Governments [YVCOG] 2018).

Table 5. Minority and Low-Income Populations: Region and Larger Regions, 2019

Jurisdiction	Total Population	Percent Minorities	Percent American Indian and Alaska Native	Percent of Individuals Below Poverty Level
Census Tract 9400.03	3,315	71.1	49.35	18.6
Yakima County	249,697	56.8	4.01	17.4

Source: USCB, 2015-2019 American Community Survey 5-Year Estimates, Table B03002: Hispanic or Latino Origin by Race; Table S1701: Poverty Status in the Last 12 Months (USCB 2020b, 2020d)

Some members of the Confederated Tribes and Bands of the Yakama Nation have struggled with varying levels of homelessness. Limited affordable housing stock, along with frequent evictions by the tribal housing authority for late payments or breach of rental agreements, are some of the factors behind this issue of homelessness (Dake 2017).

5.4.1.6 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.

5.4.2 Environmental Consequences

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

5.4.2.1 No Action Alternative

The No Action Alternative would have no impacts on economic development, population demographics, housing, community services, and environmental justice because there would be no change from existing conditions. Under this alternative, the existing/baseline conditions would continue at the Fort Simcoe Civilian Conservation Center.

5.4.2.2 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 due to use of local construction labor. Long-term effects on the local economy would have little to no measurable impact.

Population Demographics. The Proposed Action Alternative would result in no impact to the demographics of the local or regional areas.

Housing. The Proposed Action Alternative would result in no impact to the housing in the local area.

Community Services. There are no anticipated impacts to police, law enforcement public services, or recreational opportunities as a result of the Proposed Action Alternative. There would be no increase in staff or trainees as a result of the Proposed Action Alternative and therefore there would not be any additional demand on the services. The Proposed Action Alternative would have a beneficial impact on fire protection from replacement of existing water distribution system to improve fire flow and the replacement of existing fire hydrants at the Fort Simcoe Civilian Conservation Center. With greater water pressure available from the proposed new pipelines and improved functionality of new hydrants, the beneficial impact to fire protection would improve safety of staff and trainees at the Fort Simcoe Civilian Conservation Center and meet state guidelines for fire protection systems on site. Availability of adequate onsite water and water pressure and new hydrants would assist the local fire department in suppressing fires at the Fort Simcoe Civilian Conservation Center.

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. Because the Fort Simcoe Civilian Conservation Center is located on Yakama Nation Reservation property, regular coordination occurs between the DOL and the Confederated Tribes and Bands of the Yakama Nation. As part of the NEPA process with this EA, coordination with the Confederated Tribes and Bands of the Yakama Nation occurred during the scoping process and the document available for public review and comment. No families, whether or not included in these socioeconomic groups, 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. Any impacts would not disproportionately impact low-income or minority populations to any greater degree or extent than non-minority individuals and those above the poverty line. Therefore, the Proposed Action Alternative would meet requirements of EO 12898.

Protection of Children. There are no anticipated impacts to the safety of children during the construction phase of the project. Appropriate federal and state safety measures and health regulations would be followed to protect the health and safety of all residents as

well as workers. Safety measures, barriers, and “no trespassing” signs would be placed around the perimeter of construction sites to deter children from entering or 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 the Proposed Action Alternative. Therefore, the Proposed Action Alternative would meet the requirements of EO 13045.

5.5 Utilities

This section describes the existing utilities at the facility, as well as potential impacts that could result from the No Action Alternative or implementation of the Proposed Action Alternative.

5.5.1 Affected Environment

In this section, current utility conditions with the potential to be affected by the Proposed Action Alternative are presented. Piping distribution for utilities, including water, storm, and sewer is owned and maintained by the Fort Simcoe Civilian Conservation Center.

5.5.1.1 Electrical Service

Electrical service is provided by Yakama Power Company located in Toppenish, Washington. The Yakama Power Company provides electrical service to residential, commercial, and industrial properties in the Confederated Tribes and Bands of the Yakama Nation (Yakama Power 2015). Electrical applications at the Center include: site lighting; telecommunication; alarm; security; heating, ventilation, and air conditioning [HVAC]; and water heaters (DOL 2019a).

Telecommunication service at the Center is provided by CenturyLink. There are thirteen land lines provided by CenturyLink, with twelve land lines provided for six fire alarm control/annunciator panel (FACP) for connection to the remote monitoring station, and one security line. The rest of the phones at the Center are provided through the Voice over Internet Protocol (VoIP) system. On-site security systems at the Center include security keypad, closed-circuit televisions, motion detectors, door alarms. Ownership and maintenance responsibility for the telecommunication equipment are shared between CenturyLink and the Center (DOL 2019b).

5.5.1.2 Gas Service

The Fort Simcoe Civilian Conservation Center uses propane gas supplied by Amerigas. Propane gas at the Center is stored in aboveground storage tanks owned by the supplier (DOL 2019a).

The Center also owns and operates petroleum storage tanks used for heating facilities and fueling equipment as well as vehicles. Three petroleum ASTs, each with a capacity of 5000 gallons, are currently active at the Center. These tanks are used to store gasoline and diesel fuel. There are two petroleum USTs used for heating oil that have been identified as abandoned (DOL 2019b).

5.5.1.3 Water and Sewer

The Fort Simcoe Civilian Conservation Center sources its own potable water with three on-site ground water wells that supply water for domestic and fire suppression needs, two of which are operative. Automatic chlorinators are used to disinfect the water. Water from the two operative wells are directly fed and stored in two 55,000 gallon water tanks (Structure 101A), which is then transferred to the dormitories and other facilities at the Center through a water distribution system. The Center has an onsite sewage treatment facility, located northeast of the main campus, which includes two sewage lagoons (DOL 2019a).

Previous studies have recommended replacement of the entire domestic water distribution system at the Fort Simcoe Civilian Conservation Center (DOL 2019a). Additional issues with the water supply system include the following:

- Significant leaks in the water distribution isolation valves.
- Dead ends and erratic flow patterns throughout the system.
- Well 3 (Structure 147) is not operative.
- All three wells lack water meters.
- The automatic water pump control system is non-operational.
- Five fire hydrants are not operable and six isolation valves at the water distribution are leaking.

5.5.2 Environmental Consequences

In this section, the potential impacts to utilities that could result from the No Action Alternative and implementation of the Proposed Action Alternative are described.

5.5.2.1 No Action Alternative

Under the No Action Alternative, replacement of the water distribution system pipes and replacement of fire would not occur. The benefits of removing aging and insufficiently sized and leaking water pipes also would not occur. Leaking and breakages in the water distribution system would continue, causing inefficient water usage and potential damage to buildings. Low water pressure may also reduce the ability or effectiveness of efforts to suppress fires should they occur at the Fort Simcoe Civilian Conservation Center. However, the No Action Alternative would have no significant impact on utilities, but the impacts from the current water distribution system would be readily apparent and appreciable (moderate impact).

5.5.2.2 Proposed Action Alternative

Under the Proposed Action Alternative, water usage efficiency is expected to improve for the Fort Simcoe Civilian Conservation Center because of less leaking and breakages within the water distribution system. Pipes within the water distribution network would be upgraded and metered to provide required fire flow rates to the fire hydrants, and

therefore, water pressure would improve at all the fire hydrants on the Fort Simcoe Civilian Conservation Center property, increasing the effectiveness of fire suppression.

The Proposed Action Alternative would have beneficial impacts on utilities from improvements to the water supply system because installation of the new system would ensure safe and adequate water supply at the Fort Simcoe Civilian Conservation Center for drinking, cleaning, and fire suppression.

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 actions at the Fort Simcoe Civilian Conservation 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 Fort Simcoe Civilian Conservation Center Property

Within the past five years, the facility maintenance operator, the USDA Forest Service is responsible for operation and maintenance of the Fort Simcoe Civilian Conservation Center. Maintenance, repair, and minor renovation projects have included:

Completed Projects

- Replacement of the Den (dormitories) 1, 3, and 4 water heaters.
- Replacement of Building 144 air handler.
- Replacement of Building 150 HVAC.
- Replacement of Building 123 HVAC.
- Replacement of Building 143 Pump #1.
- Replacement of Building 156 hood exhaust and condenser.

Current Projects

- Replacement/upgrade of site lighting.
- Food Services Building 156 T&B.

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 2019a):

- Replace HVAC systems on six major Center buildings (Buildings 117, 121, 123, 145, 148 and 153) to provide more reliable and energy efficient cooling and heating.
- Replace deteriorated electrical system in Building 148.
- Replace deteriorated fire alarm systems in Buildings 121, 148, and 162.

- Replace end-of-service life fire alarm systems in Buildings 117 and 146.
- Repairs to and reinforcing of front doors to the Food Service/Culinary Arts Building (Building 156) to protect against more wind damage.
- Improve conditions in Gymnasium (Building 145) with renovations and upgrades to toilet rooms for accessibility compliance.
- Restore Laundry Building (Building 159) to its original use by repairing electrical, mechanical and plumbing systems and restoring the washer and dryer machines.
- Construct an addition to Health Service Building (Building 116) to consolidate medical and dental functions and the repurposing or demolition of the old Building 123.
- Install a stand-by generator that would provide emergency power back-up to Food Service/Culinary Arts Building (Building 156) and Dormitory Building 4.

5.6.2 Actions by Others in the Surrounding Area

There are no actions in the foreseeable future to be performed by others. The Fort Simcoe Civilian Conservation Center is located within the Confederated Tribes and Bands of the Confederated Tribes and Bands of the Yakama Nation. The Confederated Tribes and Bands of the Yakama Nation has no information on improvements or actions in the surrounding area. Yakima County has no plans for infrastructure changes identified in its comprehensive plan for the surrounding area (Yakima County 2017).

5.6.3 Potential Cumulative Impacts

Recent maintenance, repair, and minor renovation projects conducted at the Fort Simcoe Civilian Conservation Center did not appear to have resulted in any adverse impacts and led to the beneficial impacts of needed improvements to the facility. All of the potential future projects planned for the facility 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 and it is anticipated that past and present development trends on the Fort Simcoe Civilian Conservation Center property would continue. 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 little to no measurable impact on soils and geology, surface water, vegetation, wetlands, wildlife, climate change, hazardous and toxic substances, noise, economic development, , and transportation with only short-term effects related to construction

activities and any effects would be avoided or minimized with the implementation of the mitigation measures or best management practices presented in Section 5.7. Impact topics that would be affected by the Proposed Action Alternative over the long term (i.e., vegetation and wildlife) were determined to not involve sensitive or limited resources. Lastly, the amount of energy and water resources needed at the Fort Simcoe Civilian Conservation Center would be reduced and would have a beneficial effect on energy conservation, community services (fire suppression and management), and utilities. 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 minimize and mitigate environmental impacts during construction, operation, and maintenance activities, 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.
- All Transite or asbestos-cement pipe junctures would be properly handled, removed, and disposed in accordance with regulatory requirements.

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

6.0 FINDINGS AND CONCLUSIONS

This Environmental Assessment was conducted in accordance with the requirements of NEPA, the CFR regulations implementing NEPA (40 CFR 1500), and the DOL NEPA Compliance Procedures (29 CFR §11). As analyzed and discussed in this EA, impacts of the Proposed Action Alternative for the replacement of the water distribution system at the Fort Simcoe Civilian Conservation Center have been considered and no significant impacts were identified. Therefore, issuance of a FONSI is warranted and preparation of an Environmental Impact Statement is not required.

7.0 AGENCY CONSULTATION

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

- Tribal Historic Preservation Office (THPO) of the Confederated Tribes and Bands of the Yakama Nation
- U.S. Fish & Wildlife Service (USFWS)
- Confederated Tribes and Bands of the Yakama Nation

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

