

**Widening of US 421/KY 80 to Three Lanes
from the Daniel Boone (Hal Rogers) Parkway
to KY 149 (Lockarts Creek Road)
Pre-Design Scoping Study**

Clay County Item No. 11-8003.00



**Environmental Justice & Community Impact
Report**

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1. INTRODUCTION

The following Environmental Justice report is an assessment of community demographics and characteristics related to a defined study area for the widening of US 421/KY 80 to three lanes from the Daniel Boone (Hal Rogers) Parkway to KY 149 (Lockarts Creek Road) in Clay County. The project is listed as item number 11-8003.00 in the Kentucky Transportation Cabinet's 2005-2010 Recommended Six-Year Highway Plan and is scheduled for the design phase in 2005, right-of-way phase in 2007, and utility relocation phase in 2008. The study area is primarily commercial with very few residential structures; however, statistical data from the U.S. Census Bureau's 2000 Census is provided to display population by race, population by age, and population below poverty level by age, for the United States, Kentucky, Clay County, and Census Tracts and Block Groups located in and around the study area.

Resources used during the compilation of this report include, but are not limited to, the following: the U.S. Census Bureau, Kentucky State Data Center, Kentucky Transportation Cabinet, local elected officials, community leaders, and field observations of the study area. The information and results included herein are intended to assist the Kentucky Transportation Cabinet in making informed and prudent transportation decisions with respect to the study area, particularly with regard to the requirements of Executive Order 12898¹, to ensure equal environmental protection to all groups potentially impacted by this project.

2. WHAT IS ENVIRONMENTAL JUSTICE?

The U.S. EPA Office of Environmental Justice (EJ) defines EJ as:

“The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations and policies. Fair treatment means that no group of people, including racial, ethnic, or socio-economic group should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local and tribal programs and policies.”

A disproportionately high and adverse effect on a minority or low-income population means an adverse effect that:

1. is predominately borne by a minority population and/or low-income population, or
2. will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that

¹ Executive Order 12898 signed on February 11, 1994 states “...each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations...”

will be suffered by the non-minority population and/or non-low-income population.

3. DEFINITIONS

USDOT Order 5610.2 on EJ, issued in the April 15, 1997 Federal Register defines what constitutes low income and minority populations.

- Low-Income is defined as a person whose median household income is at or below the U.S. Department of Health and Human Services poverty guidelines.
- Minority is defined as a person who is: (1) Black (a person having origins in any black racial groups of Africa); (2) Hispanic (a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race); (3) Asian American (a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands); or (4) American Indian and Alaskan Native (a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition).
- Low-Income Population is defined as any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant geographically dispersed/transient persons who will be similarly affected by a proposed DOT program, policy or activity.
- Minority Population is defined as any readily identifiable group of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons who will be similarly affected by a proposed DOT program, policy or activity.

EO 12898 and USOT Order 5610.2 do not address consideration of the elderly population. However, the U.S. DOT encourages the study of these populations in EJ discussions and in accordance with EJ, Title VI of the Civil Rights Act of 1964 and the Kentucky Transportation Cabinet's advocacy of inclusive public involvement and equal treatment of all persons this report includes statistics for persons age 62 and over that are within the study and comparison areas.

4. METHODOLOGY

For this study, data was collected by using the method outlined by the KYTC document, "Methodology for Assessing Potential Environmental Justice Concerns for KYTC Planning Studies" (see Appendix 2).

The primary sources of data used in the compilation of this report were the United States Census Bureau's 2000 Census, the Kentucky State Data Center, local elected officials, community leaders, and field observations. Statistics were collected to present a detailed analysis of the community conditions for the study area.

5. CENSUS DATA ANALYSIS

The U.S. Census Bureau defines geographical units as:

- Census Tract (CT) – “A small, relatively permanent statistical subdivision of a county or statistically equivalent entity delineated for data presentation purposes by a local group of census data users or the geographic staff of a regional census center in accordance with Census Bureau guidelines. CTs generally contain between 1,000 and 8,000 people. CT boundaries are delineated with the intention of being stable over many decades, so they generally follow relatively permanent visible features. They may also follow governmental unit boundaries and other invisible features in some instances; the boundary of a state or county is always a census tract boundary.”
- Block Group (BG) - “A statistical subdivision of a CT. A BG consists of all tabulation blocks whose numbers begin with the same digit in a CT. BGs generally contain between 300 and 3,000 people, with an optimum size of 1,500 people.”
- Census Block (CB) – “An area bounded on all sides by visible and/or invisible features shown on a map prepared by the Census Bureau. A CB is the smallest geographic entity for which the Census Bureau tabulates decennial census data.”

The study and comparison area analysis includes percentages for minority, low-income and elderly populations in the United States, Kentucky, Clay County, and Census Tracts and Block Groups located in and around the study area.

6. STUDY FINDINGS

This Environmental Justice and Community Impact Report is to be used as a component of a pre-design scoping study currently being conducted by the Kentucky Transportation Cabinet’s Division of Planning for the widening of US 421/KY 80 to three lanes from the Daniel Boone (Hal Rogers) Parkway to KY 149 (Lockarts Creek Road) in Clay County (Six-Year Plan Item No. 11-8003.00). This study is intended to help define the location and purpose of the project and meet federal requirements regarding consideration of environmental issues as defined in the National Environmental Policy Act (NEPA).

According to the 2000 Census, there are six (6) Census Tracts and nineteen (19) Block Groups that encompass the population of Clay County. Figure 6.1 presents the population totals for each of these Census divisions and figure 6.2 displays the location of each of the Census Tracts and Block Groups in Clay County. Figure 6.3 illustrates the Census divisions in and around the defined US 421 project area.

Figure 6.1

Clay County Total Population (2000 Census):	24,556
Census Tract 9501	2,718
Block Group 1	1,559
Block Group 2	1,159
Census Tract 9502	6,064
Block Group 1	1,711
Block Group 2	1,577
Block Group 3	1,709
Block Group 4	1,067
Census Tract 9503	7,145
Block Group 1	747
Block Group 2	2,792
Block Group 3	887
Block Group 4	1,370
Block Group 5	1,349
Census Tract 9504	3,870
Block Group 1	830
Block Group 2	819
Block Group 3	2,221
Census Tract 9505	3,132
Block Group 1	818
Block Group 2	1,475
Block Group 3	839
Census Tract 9506	1,627
Block Group 1	614
Block Group 2	1,013

Figure 6.2

Clay County Census Tracts and Block Groups

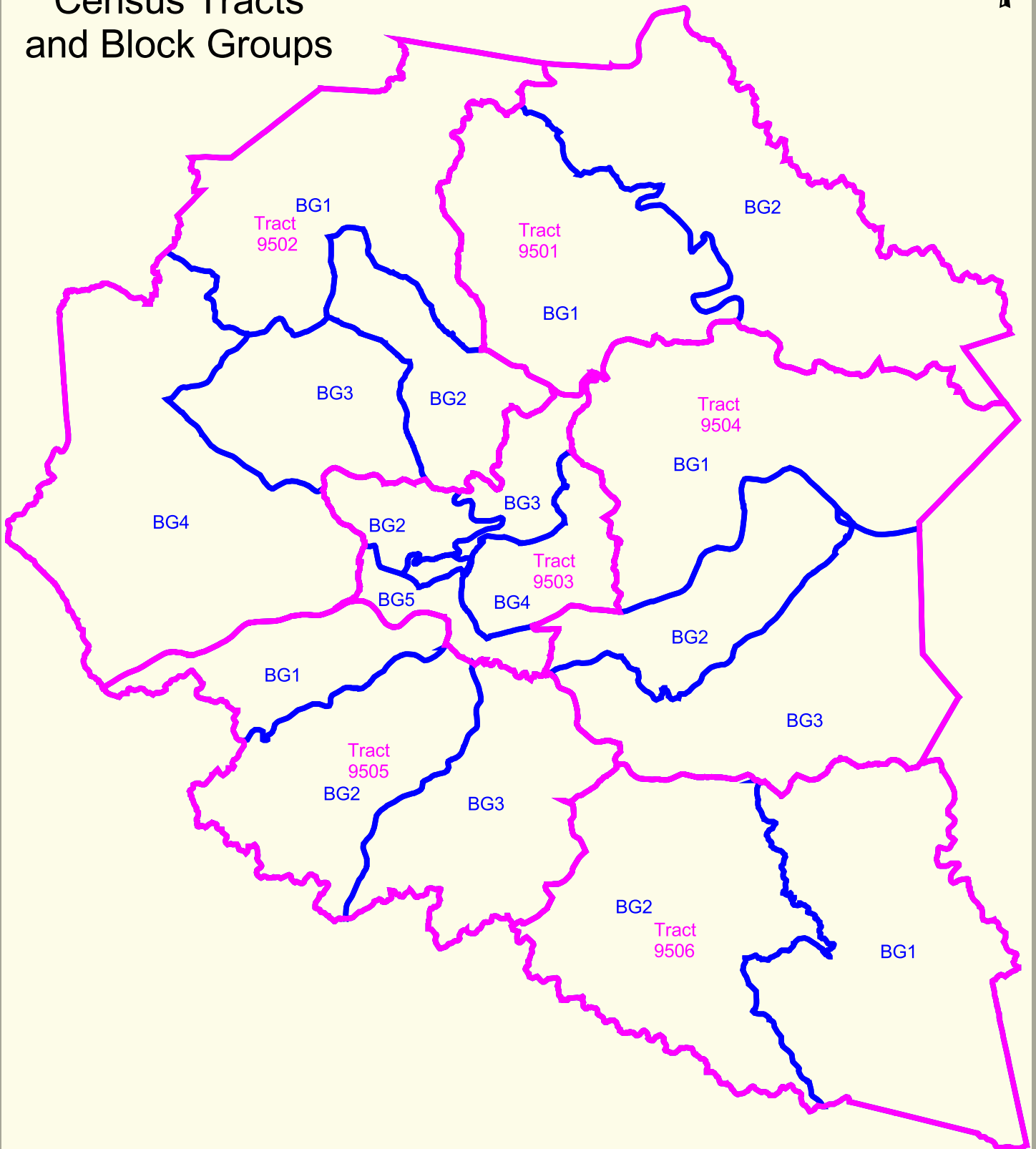







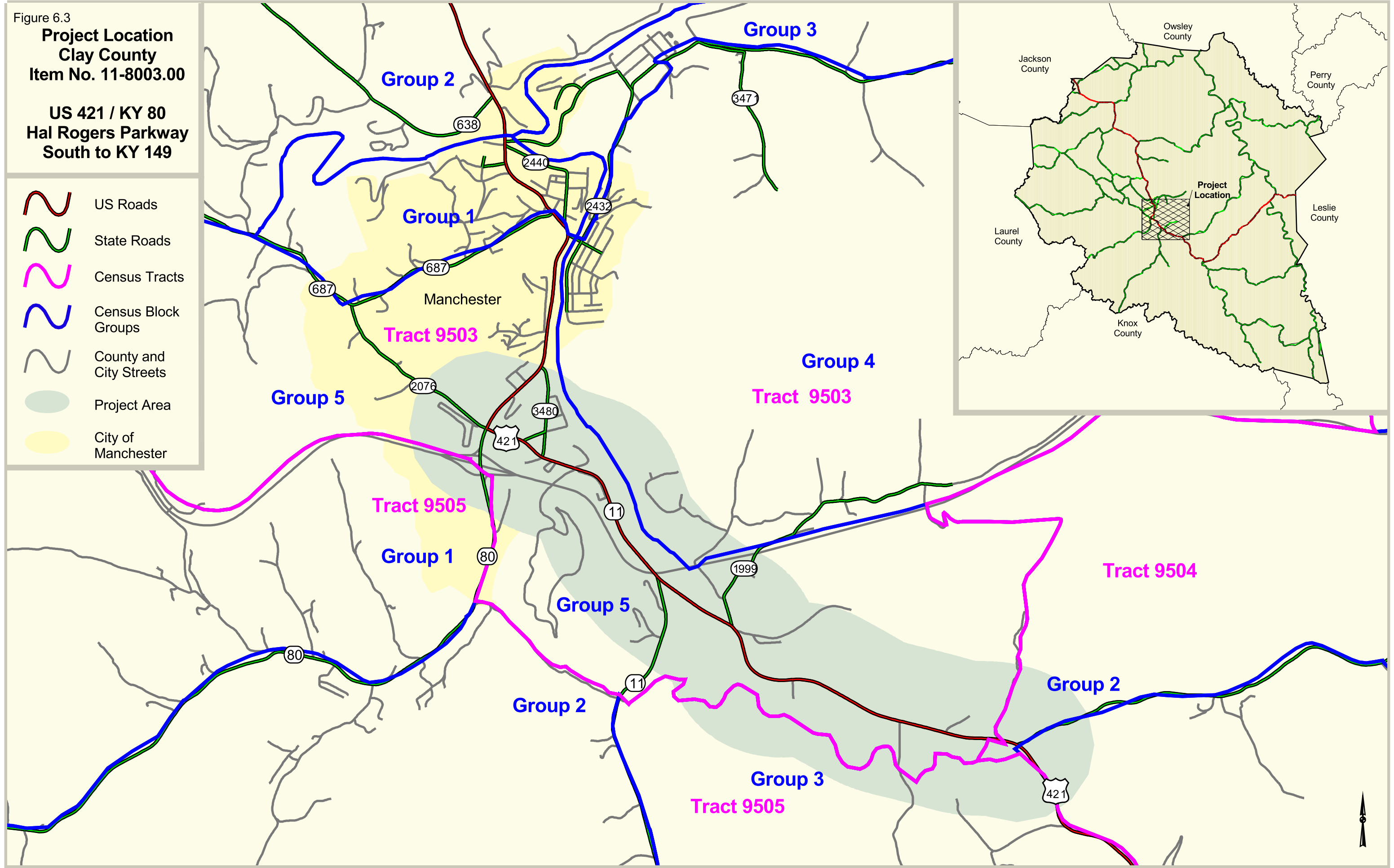


Figure 6.3
Project Location
Clay County
Item No. 11-8003.00

US 421 / KY 80
Hal Rogers Parkway
South to KY 149

-  US Roads
-  State Roads
-  Census Tracts
-  Census Block Groups
-  County and City Streets
-  Project Area
-  City of Manchester



Evaluation of the study area consisted of compiling Census data for three (3) Tracts and six (6) Block Groups within those Tracts directly intersecting the study area. These Census divisions are as follows:

- Tract 9503 – Block Groups 4 & 5
- Tract 9504 – Block Groups 2 & 3
- Tract 9505 – Block Groups 1 & 3

Comparative data from five (5) Tracts and seven (7) Block Groups was collected for areas surrounding the study area, but having no direct intersection or inclusion in the area. This data includes the following Census divisions:

- Tract 9502 – Block Group 4
- Tract 9503 – Block Groups 2 & 3
- Tract 9504 – Block Group 1
- Tract 9505 – Block Group 2
- Tract 9506 – Block Groups 1 & 2

7. STUDY FINDINGS – Population by Race

Figure 7.1 indicates a majority of the Census Tracts and Block Groups that directly intersect and surround the study area contain a very homogenous population of white individuals in comparison to national and state statistics for population by race.

One exception to the preceding statement is Tract 9503, which encompasses a significant minority population. Discussions with local officials and a subsequent review of Census Block data resulted in the determination that the increased minority population in Tract 9503 could be directly attributed to the inclusion of individuals currently incarcerated in the Federal Correctional Institute (FCI) of Manchester (see Figure 7.2, Tract 9503-Block 2010). The FCI of Manchester is a medium security facility that currently houses approximately 1,750 males and is located outside of the established study area.

An additional concentration of minority population was discovered in Tract 9503, Block Group 5, in Blocks 5010, 5012, 5014, 5016, and 5017 (see Figure 7.2). A portion of this area, located along Pennington Hill Road in Manchester, is actually within an expanded study area buffer zone; however, it is anticipated that the area will not be impacted by the proposed project (see Figure 7.3).

Discussions with local elected officials and community members resulted in the conclusion that additional concentrations of minorities are not located in the study area; therefore, it is anticipated that the implementation of this project would not have a disproportionate effect on minorities residing in and around the study area. CVADD Staff will continue to monitor racial composition in the study area and report any changes and/or developments that may occur in the future that could alter the findings of this report.

Figure 7.1 - Population by Race

	White	% of Population	Black	% of Population	Indian	% of Population	Asian	% of Population	Hispanic ¹	% of Population	Other	% of Population	Population
United States	211,460,626	75.1%	34,658,190	12.3%	2,475,956	0.9%	10,242,998	3.6%	35,305,818	12.5%	22,584,136	8.0%	281,421,906
Kentucky	3,640,899	90.1%	295,994	7.3%	8,616	0.2%	29,744	0.7%	59,939	1.5%	66,526	1.6%	4,041,769
Clay County	23,063	93.9%	1,178	4.8%	51	0.2%	29	0.1%	333	1.4%	235	1.0%	24,556
Tract 9503	5,967	83.5%	1,004	14.1%	30	0.4%	19	0.3%	218	3.1%	125	1.7%	7,145
Block Group 4	1,334	97.4%	28	2.0%	0	0.0%	3	0.2%	12	0.9%	5	0.4%	1,370
Block Group 5	1,267	93.9%	53	3.9%	1	0.1%	5	0.4%	4	0.3%	23	1.7%	1,349
Tract 9504	3,846	99.4%	0	0.0%	0	0.0%	1	0.0%	27	0.7%	23	0.6%	3,870
Block Group 2	818	99.9%	0	0.0%	0	0.0%	0	0.0%	5	0.6%	0	0.0%	819
Block Group 3	2,209	99.5%	0	0.0%	0	0.0%	0	0.0%	17	0.8%	12	0.5%	2,221
Tract 9505	3,011	96.1%	89	2.8%	6	0.2%	2	0.1%	33	1.1%	24	0.8%	3,132
Block Group 1	796	97.3%	18	2.2%	3	0.4%	1	0.1%	4	0.5%	0	0.0%	818
Block Group 3	829	98.8%	2	0.2%	3	0.4%	1	0.1%	8	1.0%	4	0.5%	839
Tract 9502	5,997	98.9%	27	0.4%	9	0.1%	2	0.0%	17	0.3%	29	0.5%	6,064
Block Group 4	1,050	98.4%	9	0.8%	2	0.2%	0	0.0%	0	0.0%	6	0.6%	1,067
Tract 9503	5,967	83.5%	1,004	14.1%	30	0.4%	19	0.3%	218	3.1%	125	1.7%	7,145
Block Group 2	1,825	65.4%	845	30.3%	28	1.0%	10	0.4%	195	7.0%	84	3.0%	2,792
Block Group 3	875	98.6%	6	0.7%	0	0.0%	0	0.0%	3	0.3%	6	0.7%	887
Tract 9504	3,846	99.4%	0	0.0%	0	0.0%	1	0.0%	27	0.7%	23	0.6%	3,870
Block Group 1	819	98.7%	0	0.0%	0	0.0%	1	0.1%	5	0.6%	10	1.2%	830
Tract 9505	3,011	96.1%	89	2.8%	6	0.2%	2	0.1%	33	1.1%	24	0.8%	3,132
Block Group 2	1,386	94.0%	69	4.7%	0	0.0%	0	0.0%	21	1.4%	20	1.4%	1,475
Tract 9506	1,614	99.2%	1	0.1%	0	0.0%	0	0.0%	14	0.9%	12	0.7%	1,627
Block Group 1	606	98.7%	0	0.0%	0	0.0%	0	0.0%	6	1.0%	8	1.3%	614
Block Group 2	1,008	99.5%	1	0.1%	0	0.0%	0	0.0%	8	0.8%	4	0.4%	1,013

Source: US Census Bureau, 2000 Census

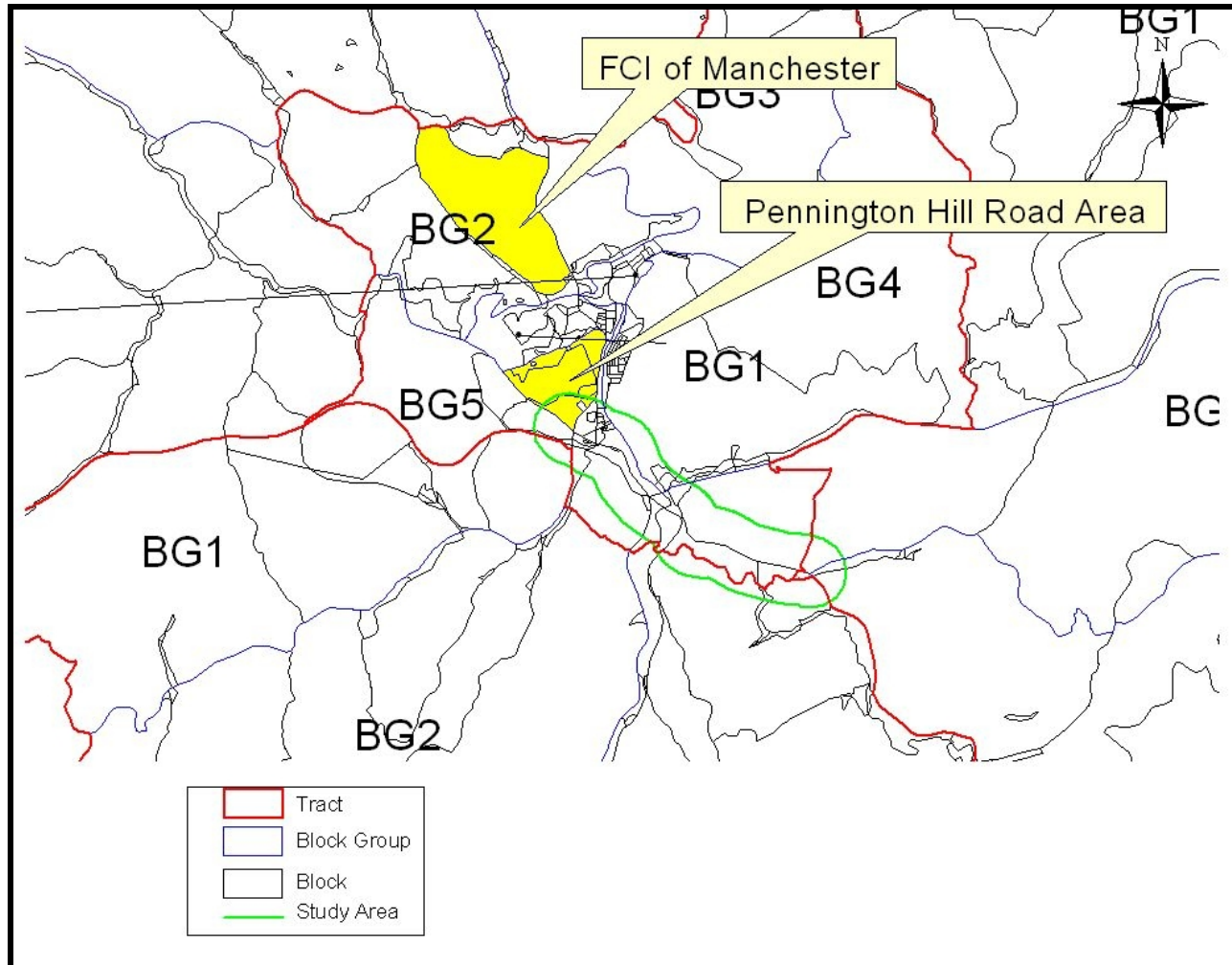
*Census Divisions directly intersecting the defined study area

**Census Divisions surrounding the defined study area

Figure 7.2 - Census Block Data for Points of Interest

Census Tract	Census Block	Total Population	Population of One Race	One Race						Two or More Races		
				White Alone	Black or African American Alone	American Indian & Alaska Native Alone	Asian Alone	Hawaiian & other Pacific Islander Alone	Some Other Race Alone	Population of Two or More Races	Hispanic or Latino Origin	
9503	2010	1984	1953	1036	834	28	10	1	44	31	189	
9503	5010	57	57	54	3	0	0	0	0	0	0	
9503	5012	254	245	232	12	0	1	0	0	9	0	
9503	5014	138	136	121	15	0	0	0	0	2	0	
9503	5016	41	35	21	14	0	0	0	0	6	0	
9503	5017	77	77	71	3	0	3	0	0	0	0	

Figure 7.3 – Points of Interest



8. STUDY FINDINGS – Population by Poverty Level

Figure 8.1 illustrates that the population below poverty level for Clay County and all Census Tracts and Block Groups in and around the study area, significantly exceeds national and state averages. The percentage of persons below poverty level in the evaluated Census divisions ranges from a low of 21.2% to a high of 65.5%. A majority of the Census divisions contain percentages that are at least three times higher than the national average of 12.4% and more than two times greater than the state average of 15.8%.

Economic distress is the most important issue affecting Clay County today. The county continues to experience significant unemployment, a limited number of quality job opportunities, low-income levels, and high poverty rates. These detrimental factors destabilize the local economy and decrease the quality of life for residents. While the population below poverty level in surrounding southeastern Kentucky counties also exceeds state and national averages, a comparison of the data shows that Clay County is an extreme case.

Community leaders support the proposed project and view it as an opportunity to provide adequate access for citizens to a substantial commercial district in the community and expand economic growth and development.

Figure 8.1 - Population Below Poverty Level by Age (1999)

	Age 0-17	% of Total Pop.	Age 18-64	% of Total Pop.	Age 65-Over	% of Total Pop.	Total Below Poverty Level	% of Total Pop.	1999 Total Pop.
United States	11,746,858	4.3%	18,865,180	6.7%	3,287,774	1.2%	33,899,812	12.4%	273,882,232
Kentucky	203,547	5.2%	350,072	8.6%	67,477	1.7%	621,096	15.8%	3,927,047
Clay County	2,852	12.8%	5,262	23.6%	746	3.3%	8,860	39.7%	22,314
Tract 9503	555	10.3%	1,053	19.6%	193	3.6%	1,801	33.5%	5,379
Block Group 4	152	11.1%	273	19.9%	47	3.4%	472	34.5%	1,369
Block Group 5	173	12.8%	365	27.1%	91	6.7%	629	46.7%	1,349
Tract 9504	616	15.9%	1,112	28.7%	173	4.5%	1,901	49.1%	3,870
Block Group 2	165	20.6%	307	38.3%	52	6.5%	525	65.5%	801
Block Group 3	311	13.7%	580	25.6%	84	3.7%	975	43.1%	2,263
Tract 9505	444	14.4%	857	27.7%	124	4.0%	1,425	46.1%	3,090
Block Group 1	103	12.3%	192	22.9%	48	5.7%	343	41.0%	837
Block Group 3	78	9.9%	188	23.9%	47	6.0%	313	39.9%	785
Tract 9502	694	11.7%	1,297	21.9%	125	2.1%	2,116	35.8%	5,913
Block Group 4	62	5.8%	145	13.6%	19	1.8%	226	21.2%	1,065
Tract 9503	555	10.3%	1,053	19.6%	193	3.6%	1,801	33.5%	5,379
Block Group 2	120	10.9%	142	13.0%	12	1.1%	274	25.0%	1,096
Block Group 3	68	8.0%	143	16.8%	25	2.9%	236	27.7%	853
Tract 9504	616	15.9%	1,112	28.7%	173	4.5%	1,901	49.1%	3,870
Block Group 1	140	17.4%	225	27.9%	37	4.6%	402	49.9%	806
Tract 9505	444	14.4%	857	27.7%	124	4.0%	1,425	46.1%	3,090
Block Group 2	263	17.9%	477	32.5%	29	2.0%	770	52.4%	1,468
Tract 9506	270	16.3%	361	21.8%	72	4.4%	703	42.6%	1,653
Block Group 1	63	10.6%	159	26.8%	31	5.2%	253	42.7%	594
Block Group 2	207	19.5%	202	19.1%	41	3.9%	450	42.5%	1,059

Source: US Census Bureau, 2000 Census

*Census Divisions directly intersecting the defined study area

**Census Divisions surrounding the defined study area

9. STUDY FINDINGS – Population by Age

Figure 9.1 displays that the age of the population in the Census divisions of Clay County is for the most part consistent with age group composition in the United States and Kentucky; however, the percentage of persons age 62 and over in Tract 9503, Block Groups 3 and 5 exceed, albeit not significantly, national and state percentages. Following a discussion with the Director of the Clay County Old Timers and a review of Census Block data for age dispersion, it was determined that no significant concentrations of persons age 62 are located in the study area.

Additional consultations with community leaders resulted in a conclusion that significant concentrations of persons age 62 and over are not evident in and around the study area; therefore, it is anticipated that the implementation of this project would not have a disproportionate effect on the population of persons age 62 and over residing in the proposed study area.

Figure 9.1 - Population by Age

	Age 0-17	% of Population	Age 18-61	% of Population	Age 62-Over	% of Population	Total
United States	72,293,812	25.7%	174,136,341	61.9%	34,991,753	12.4%	281,421,906
Kentucky	994,818	24.6%	2,542,158	62.9%	504,793	12.5%	4,041,769
Clay County	6,232	25.4%	15,231	62.0%	3,093	12.6%	24,556
Tract 9503	1,394	19.5%	4,886	68.4%	865	12.1%	7,145
Block Group 4	372	27.2%	818	59.7%	180	13.1%	1,370
Block Group 5	364	27.0%	775	57.4%	210	15.6%	1,349
Tract 9504	1,083	28.0%	2,344	60.6%	443	11.4%	3,870
Block Group 2	222	27.1%	492	60.1%	105	12.8%	819
Block Group 3	606	27.3%	1,364	61.4%	251	11.3%	2,221
Tract 9505	823	26.3%	1,911	61.0%	398	12.7%	3,132
Block Group 1	195	23.8%	502	61.4%	121	14.8%	818
Block Group 3	233	27.8%	510	60.8%	96	11.4%	839
Tract 9502	1,594	26.3%	3,639	60.0%	831	13.7%	6,064
Block Group 4	261	24.5%	653	61.2%	153	14.3%	1,067
Tract 9503	1,394	19.5%	4,886	68.4%	865	12.1%	7,145
Block Group 2	297	10.6%	2,314	82.9%	181	6.5%	2,792
Block Group 3	208	23.4%	528	59.5%	151	17.0%	887
Tract 9504	1,083	28.0%	2,344	60.6%	443	11.4%	3,870
Block Group 1	255	30.7%	488	58.8%	87	10.5%	830
Tract 9505	823	26.3%	1,911	61.0%	398	12.7%	3,132
Block Group 2	395	26.8%	89	6.0%	181	12.3%	1,475
Tract 9506	441	27.4%	947	58.9%	219	13.6%	1,607
Block Group 1	162	26.4%	358	58.3%	94	15.3%	614
Block Group 2	299	29.5%	589	58.1%	125	12.3%	1,013

Source: US Census Bureau, 2000 Census

*Census Divisions directly intersecting the defined study area

**Census Divisions surrounding the defined study area

10. CONCLUSION

Following a comprehensive review of demographic data from the U.S. Census Bureau, discussions with local officials regarding community features, and field observations, Cumberland Valley Area Development District staff has concluded that a defined Environmental Justice community does not exist within the study area for the proposed widening of US 421/KY 80 to three lanes from the Daniel Boone (Hal Rogers) Parkway to KY 149 (Lockards Creek Road) in Clay County.

Analysis of racial composition data resulted in a single Census Tract being identified in and around the study area that contained a percentage of minorities exceeding national and state averages. It was noted that the increase in minority population was related to the existence of a federal penitentiary located outside of the study area that would ultimately not be affected by the proposed project. An additional area of minority concentration, Pennington Hill Road, was identified for consideration. Although an expanded study boundary buffer encompasses a portion of this area, no project impact is anticipated in the area.

Extremely high percentages of the population below poverty level in the study area are alarming; however, discussions with local officials and a field review led to the conclusion that no concentration of individuals below the poverty level will be disproportionately affected by this project. Community leaders have expressed optimism that the proposed project will be a tremendous benefit for Manchester and Clay County due to improved access to a substantial commercial district and the potential for expanded economic development.

Age analysis indicates that the distribution of elderly residents in the study area closely resembles the national and state averages, and no specific concentrations of elderly residents were discovered during the compilation of this report.

CVADD Staff will continue to monitor the progress of this project and reevaluate the Environmental Justice Review to document any demographic and/or socioeconomic changes that may occur in and around the study area throughout the development of the project.

APPENDIX 1

PLANNING STUDY CONTACT LIST

PLANNING STUDY CONTACT LIST

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APPENDIX 2

*METHODOLOGY
FOR ASSESSING
ENVIRONMENTAL JUSTICE CONCERNS*

Methodology for Assessing Potential Environmental Justice Concerns for KYTC Planning Studies

Updated: February 1, 2002

The demographics of the affected area should be defined using U.S. Census data (Census tracts and block groups) and the percentages for minorities, low-income, elderly, or disabled populations should be compared to those for the following:

- Other nearby Census tracts and block groups,
- The county as a whole,
- The entire state, and
- The United States.

Information from PVA offices, social service agencies, local health organizations, local public agencies, and community action agencies can be used to supplement the Census data. Specifically, we are interested in obtaining the following information:

- Identification of community leaders or other contacts who may be able to represent these population groups and through which coordination efforts can be made.
- Comparison of the Census tracts and block groups encompassing the project area to other nearby Census tracts and block groups, county, state, and United States percentages.
- Locations of specific or identified minority, low-income, elderly, or disabled population groups within or near the project area. This may require some field reviews and/or discussions with knowledgeable persons to identify locations of public housing, minority communities, ethnic communities, etc., to verify Census data or identify changes that may have occurred since the last Census. Examples would be changes due to new residential developments in the area or increases in Asian and/or Hispanic populations.
- Concentrations or communities that share a common religious, cultural, ethnic, or other background, e.g., Amish communities.
- Communities or neighborhoods that exhibit a high degree of community cohesion or interaction and the ability to mobilize community actions at the start of community involvement.
- Concentrations of common employment, religious centers, and/or educational institutions with members within walking distance of facilities.
- Potential effects, both positive and negative, of the project on the affected groups as compared to the non-target groups. This may include, but are not limited to:
 1. Access to services, employment or transportation.
 2. Displacement of persons, businesses, farms, or non-profit organizations.
 3. Disruption of community cohesion or vitality.
 4. Effects to human health and/or safety.
- Possible methods to minimize or avoid impacts on the target population groups.

Methodology for Assessing Potential Environmental Justice Concerns
for KYTC Planning Studies

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If percentages of these populations are elevated within the project area, it should be brought to the attention of the Division of Planning immediately so that coordination with affected populations may be conducted to determine the affected population's concerns and comments on the project. Also, with this effort, representatives of minority, elderly, low-income, or disabled populations should be identified so that, together, we can build a partnership for the region that may be incorporated into other projects. Also, we hope to build a Commonwealth-wide database of contacts. We are available to participate in any meetings with these affected populations or with their community leaders or representatives.

In identifying communities, agencies may consider as a community either a group of individuals living in geographic proximity to one another, or a geographically dispersed/transient set of individuals (such as migrant workers or Native Americans), where either type of group experiences common conditions of environmental exposure or effect. The selection of the appropriate unit of analysis may be a governing body's jurisdiction, a neighborhood, census tract, or other similar unit that is to be chosen so as not to artificially dilute or inflate the affected population. A target population also exists if there is (1) more than one minority or other group present and (2) the percentages, as calculated by aggregating all minority persons, exceed that of the general population or other appropriate unit of geographic analysis.

Maps should be included that show the Census tracts and block groups included in the analysis as well as the relation of the project area to those Census tracts and block groups.

APPENDIX 3

MAPS

Figure 6.2

Clay County Census Tracts and Block Groups

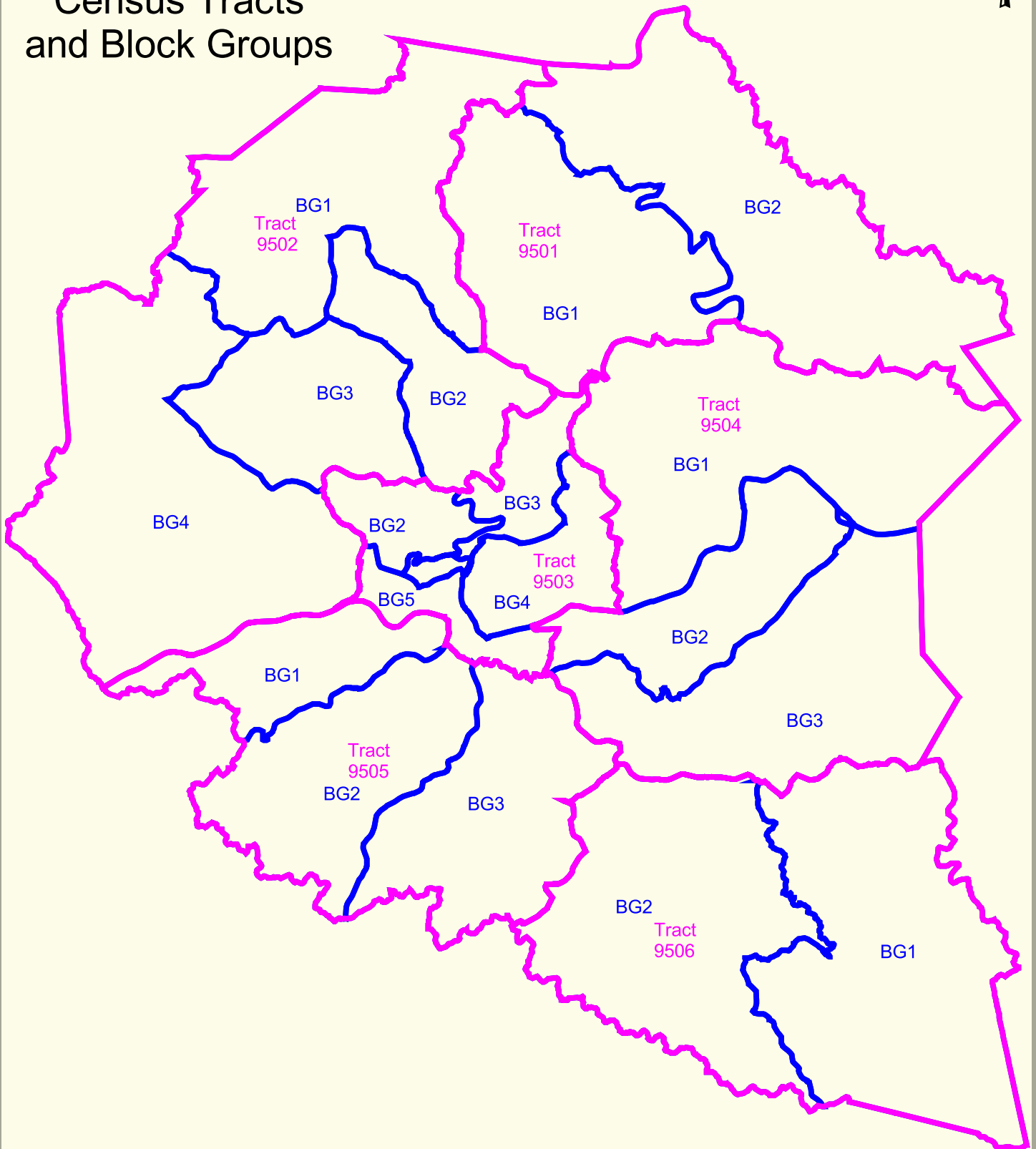









Figure 6.3
Project Location
Clay County
Item No. 11-8003.00

US 421 / KY 80
Hal Rogers Parkway
South to KY 149

-  US Roads
-  State Roads
-  Census Tracts
-  Census Block Groups
-  County and City Streets
-  Project Area
-  City of Manchester

