

DECLARATION OF THOMAS T. CASSETTY

I, THOMAS T. CASSETTY, hereby declare and state as follows:

I am president and general manager of Southern Broadcasting Corporation, licensee of Stations WABD and WCVQ, Fort Campbell, Kentucky. This declaration is given to help establish the interdependence of Oak Grove, Kentucky with other communities in the Clarksville, Tennessee-Kentucky Urbanized area, particularly Fort Campbell, Kentucky.

Oak Grove is adjacent to the main gates of Fort Campbell, the headquarters of the U.S. Army's 101st Airborne Division. The main gate, headquarters, post office, post exchange, credit union, movie theater and much of the housing on Fort Campbell is located in Christian County, Kentucky, within the Fort Campbell portion of the Clarksville, Tennessee-Kentucky Urbanized area. Exhibit 1 hereto is a fact sheet about the post published by the Department of the Army. It lists the FY 1993 population of the base as 22,378.

Commuting. To demonstrate the extent to which Oak Grove residents work in the urbanized area, rather than in Oak Grove, I am attaching as Exhibit 2 the cover page and page 37 of the "Fort Campbell Guide & Telephone Directory, 1993-94." On page 37, it is stated that 90% of the population of Oak Grove is military, i.e., stationed at Fort Campbell.

Exhibit 3 to this declaration consists of portions of the Oak Grove city plan prepared by the Hopkinsville-Christian County Planning Commission. At page 75, Oak Grove is referred to as a "bedroom" community for military personnel living off post. At page 90, it is indicated that Oak Grove population growth is

expected to be generated by military personnel who want to live in close proximity to work. At page 94, it is indicated that the majority of the population of Oak Grove is military. At page 98, it is indicated that Fort Campbell Gate 4 (the main gate and one of three entering Oak Grove) has a daily traffic count of over 20,000 vehicular trips. At page 104, it is indicated that Fort Campbell is the "largest industry in the area."

Commercial Interdependence. With respect to the commercial interdependence of Oak Grove with Fort Campbell, the Oak Grove city plan reports that the base has "a dominant effect on the social-economic development of the City" (page 75). At page 79, it is indicated that commercial activity is concentrated along Highway 41A, which is identified as a service retail area for Fort Campbell. At page 115, it is stated that over 95% of Oak Grove's jobs are service-related. On the same page, it is stated that Fort Campbell is "an enormous mainstay" to the city economy, and that proximity to the post is directly related to business prosperity. As noted above, at page 104 of the city plan it is stated that Fort Campbell is the largest "industry" in the area. At page 115, the city plan states, "Oak Grove is dependent upon Fort Campbell and the related retailers who have established business to serve the Fort Campbell market." Exhibit 4 is a newspaper advertisement by the Oak Grove Chamber of Commerce naming the city as the "Gateway to Fort Campbell."

Health Care. The city plan also states that health care needs for Oak Grove citizens are largely taken care of by Fort Campbell medical facilities (page 94).

Transportation. With respect to transportation, the city plan states that the foundation of any transportation plan must be based on the location of the three gates to Fort Campbell that face Oak Grove (page 106).

Recreation. Page 111 of the city plan indicates that Oak Grove is at least partially dependent on Fort Campbell for recreational needs.

Telephone Calling Area. Exhibit 5 hereto consists of copies of pages from the Clarksville, and Christian County telephone directories. These pages show that the local toll-free calling area for Clarksville includes Oak Grove, and visa versa.

Advertising Market. Oak Grove is part of the Clarksville, Tennessee-Hopkinsville, Kentucky advertising market. To demonstrate this, I am attaching as Exhibit 6, a list of the Oak Grove businesses which have advertised on WABD/WCVQ during the past few years. (WCVQ, Southern's 100 kW FM facility, provides city-grade service to Clarksville, Hopkinsville and communities between, such as Oak Grove.) Exhibit 7 hereto is a copy of a brochure of the Clarksville/Hopkinsville Ad Club. Members of the club include representatives of over 20 businesses in the Clarksville-Hopkinsville area, including all the radio stations and newspapers. We meet periodically to discuss matters that affect advertisers and

the media in the Clarksville-Hopkinsville area. Oak Grove, with its concentration of military personnel and location between Clarksville and Hopkinsville, is an integral part of the larger market area.

Arbitron splits its ratings surveys for our market into two county surveys, one for Montgomery County, Tennessee, and one for Christian County, Kentucky. This is standard procedure in smaller markets such as ours. Southern subscribes to both county surveys in order to ascertain our standing in the entire market.

Cooperation Among Communities. There is a high degree of cooperation among governmental organizations within the Clarksville, Tennessee-Kentucky Urbanized area. An example of such cooperation was Fort Campbell's help to the City of Oak Grove during a recent ice storm. Details are included in the letter to the Commanding General sent by Oak Grove Mayor Bobby Mace and published in the Fort Campbell Courier on February 24, 1994 (Exhibit 8). According to the letter, Fort Campbell personnel did much to alleviate problems in Oak Grove caused by the storm.

Exhibit 9 is a letter I solicited from the Oak Grove Police Department regarding cooperation with surrounding communities. The letter shows that Oak Grove officers work "hand in hand" with the Clarksville police.

PSAs. Radio stations in Clarksville and Fort Campbell carry public service announcements for Oak Grove organizations. A list of the PSA's carried on WABD/WCVQ for Oak Grove organizations during the past few years is attached as Exhibit 10 hereto.

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News. The radio stations in the Clarksville Urbanized area cover news events in Oak Grove. Examples of Oak Grove stories covered by WABD/WCVQ with the recent past are attached as Exhibit 11.

I hereby declare under penalty of perjury under the laws of the United States that the foregoing information is true and correct to the best of my knowledge and belief and that the materials attached hereto are what they are represented to be.

Signed and dated this 3rd day of March, 1994.


THOMAS T. CASSETTY

Exhibit 1

Department of the Army Fact Sheet

DEPARTMENT OF THE ARMY
Headquarters, 101st Airborne Division (Air Assault) and Fort Campbell
Fort Campbell, Kentucky 42223-5000

Current Post Population

Total Military.....22,378
 Officer.....1,936
 Warrant Officer.....878
 Enlisted.....19,564

Total Civilians.....4,502
 DAC.....2,455
 NAF.....457
 PX.....1,020
 Fort Campbell Schools.....570

Family Members.....41,354
 On Post.....10,055
 Off Post.....31,299

Supported Population

Retirees.....43,862
 Retiree family members.....67,784
 Reserve Components.....18,488

Child Development Services

Child Care Center Capacity...606
 Family Child Care Homes.....80
 School Age Latch Key Capacity.90

Hospital Data

Number of Beds.....241
 Average Daily Occupancy.....100
 Average Daily Outpatient
 Visits.....1,982
 Average Births Per Mo.....149

Religious Activities

Number of Chapels.....10
 Number of Religious
 Services Per Week.....22
 Average Attendance
 Per Week.....2,000

Family Quarters Off Enl

On Post (4,153).....
 1 Bedroom.....112
 2 Bedroom.....195.....1,339
 3 Bedroom.....477.....1,390
 4 Bedroom.....127.....483
 5 Bedroom.....30

Contributions (\$717,911)

ARR.....215,712
 CPC.....502,199

Fort Campbell Schools

Elementary Schools.....4
 Enrollment.....3092
 Middle Schools.....2
 Enrollment.....795
 High Schools.....1
 Enrollment.....652

FY 91 Disbursement.....\$942,481,663

Payroll.....\$653,038,233
 Military.....\$551,956,699
 DA Civ & Schools.....\$ 86,277,812
 NAF Employees.....\$ 5,284,899
 PX Employees.....\$ 6,400,000
 Commissary Employees..\$ 3,118,823

Other Disbursements.....\$289,443,430
 Appropriated Funds....\$265,874,096
 Nonappropriated Funds.

Operational Expend...\$ 4,419,063
 Local Capital Expend\$ 1,254,075
 Commissary
 Local Purchase for
 Resale.....\$ 5,995,987
 Operations Supplies
 and Equipment.....\$512,055
 Total Revenue-NAF (IMWRF)
 (IMWRF).....\$11,388,154

Size of Post (105,068 Acres)

48 Ranges
 5 Major Drop Zones
 1 Assault Landing Strip
 10 A2C2 Airspace Sectors
 1 Bayonet Assault Course
 1 Rappel Tower
 2 MOUT Facilities
 2 Demo Areas
 3 Impact Areas
 48 Maneuver Areas
 304 Artillery Firing Points

Engineer Activities.....\$715,967,245

Maintenance Repair.....\$ 34,962,446
 Minor Construction.....\$ 3,394,820
 MCA Construction.....\$ 13,163,075
 includes NAF and AAFES
 Real Property (Less Land)\$628,529,000
 Utilities.....\$ 11,849,884
 Other Engineer Services..\$10,040,880
 Environmental.....\$13,284,366
 Unaccmp Pers Housing.....\$742,774

END OF FY 93

Exhibit 2

Pages from Fort Campbell Guide & Telephone Directory

FORT CAMPBELL, KY

Guide & Telephone Directory

1993-94





OAK GROVE, KY

Location

Oak Grove, the second largest city in Christian County, is Ft. Campbell's nearest neighbor with Gates 4, 5, and 6 adjoining U.S. Highway 41-A in Oak Grove, Ky.

Until Ft. Campbell was located, in 1942, the area around Oak Grove was primarily made up of large farms. Many are still owned by the descendants of the original settlers. Oak Grove was founded in 1828 and incorporated in 1974.

Oak Grove is bordered on the south by Clarksville, Tenn., and by Interstate 24 on the north. Oak Grove, population 3,500, is a very young, progressive minded community, 90 percent are military.

Government

The City of Oak Grove, Ky., is governed by a mayor and a six member city council. The city enjoys excellent community relations with Ft. Campbell, Hopkinsville, and our southern neighbor, Clarksville.

Organizations

Several social and charitable organizations meet the needs of the community. The Chamber of Commerce is very active in community and military affairs. An appointed liaison, from Ft. Campbell, meets regularly with the organization to discuss the needs and the role of the military in the community.

Other civic organizations located in Oak Grove include the Kiwanis Club, Lion's Club, American Legion, and the AmVets.

Places of Worship

Oak Grove is fortunate to have several churches which minister to the spiritual, material, mental and emotional needs of its residents.

Ministries offered by Oak Grove churches include weekly worship services, Bible Study, discipleship training, evangelism and outreach, local benevolent work, fellowship, and recreation. Churches provide for persons of all ages from babies in the nursery to senior adults.

Churches in Oak Grove, their addresses, and telephone numbers are listed below. They are here to serve you and your family.

First Baptist Church,
Highway 911 439-5331
Good Hope Baptist Church,
Highway 115 439-5070
Marantha Baptist Church,
152 Stateline Rd. 439-6055
Solid Rock Full Gospel Church,
Highway 115
United Korean Church,
1160 Stateline Rd. 439-7180

General Information

Oak Grove is fortunate to be near the finest educational facilities. The Christian County school system, one of the finest in the state of Kentucky, serves the community's elementary and secondary educational needs.

Hopkinsville Community College and Austin Peay State University, Clarksville, are outstanding higher educational facilities that serve the needs of our students.

Our community is an ideal retirement area due to our proximity to Ft. Campbell, to many large cities, and only a few miles from Kentucky's best resorts and state parks which are a paradise for fishermen and water sports enthusiasts.



Exhibit 3

Cover Letter and Excerpts from Oak Grove
Comprehensive Plan (Emphasis Supplied)



COMMONWEALTH OF KENTUCKY
CITY OF OAK GROVE
P.O. BOX 217 OAK GROVE, KY 42262

PHONE: (502) 439-4646

FAX: (502) 439-1201

March 1, 1994

Lee Erwin
WCVQ-Radio Station
Stateline Road
Clarksville, TN. 37402

Subject: Comprehensive Plan

Dear Lee:

The attached documents are official excerpts from the City of Oak Grove Comprehensive plan. I hope this documentation will help you with your endeavors. Should you have any questions or concerns, please feel free to contact me.

Thank you for your interest in our services.

Sincerely,

A handwritten signature in cursive script that reads "Keith D. Lampkin".

Keith D. Lampkin,
Planner

Attachments:

ACKNOWLEDGEMENTS

The staff of the Hopkinsville-Christian County Planning Commission wish to express its gratitude to Sandra Porter - Administrative Coordinator of the Pennyryle Area Development District, Lenette Alexander - Reference Librarian of the Hopkinsville-Christian County Public Library, Barbara A. Johnson - City Clerk of Oak Grove Kentucky, and LT Stuart Thomas of the Oak Grove Volunteer Fire Department for their technical and general information which aided in the development of this document.

In addition, extensive information was incorporated into the survey aspect of this document from the American Planning Association Planning Advisory Service Report Number 404 of 1987 entitled "How to Conduct a Citizen Survey" by T. Van Houten and H. Hatry.

SOCIAL

LOGISTICS

1. Location: Oak Grove is located in south Christian County, Kentucky.
2. Location: Christian County is located in Western Kentucky and forms the northern borderline between Kentucky and Tennessee.
3. Location: Oak Grove is in the southern portion of the County and the southern portion of the City limits forms the Kentucky and Tennessee State line.
4. Location: To the west of Oak Grove lies the Ft. Campbell Military Post. The military facility borders and is adjacent to a portion of Oak Grove. Interstate 24 (I-24) forms the northern most boundary line and to the east, Kentucky 115 forms the eastern boundary line with a small portion of the City extending past Kentucky 115.
5. Annexation: Currently the City is composed of 5,818.5 acres or 9.09 square miles and is in the process of annexing approximately 115 more acres to the west adjacent to Ft. Campbell.
6. Annexation: Oak Grove has aggressively annexed over the past couple of years. The following chart provides the areas annexed and the size of the annexed areas.

- C. **Known Developments:** Also taken into account in the projections were known developments which would effect the population. An example of these types of impacts is the 801 Housing Project which will be developed around 1991 and the start-up of a new sewer system in 1991.
- D. **Ft. Campbell Market:** Ft. Campbell has such a dominant effect on the social-economic development of the City that it must be taken into account. The continual change-over in personnel (every 2 years) occurring at the post provides a perpetual market to the City of Oak Grove for housing possibilities. The close proximity of the post also makes Oak Grove an ideal "bedroom" community for military personnel living off-post.
- E. **Transient Nature of Existing Residents:** Records indicate that the turnover-rate in Oak Grove residents are phenomenal. As provided in the Facts/Figures Component, the total population changes every five (5) years which influence the accuracy of any type of projection.

The following projections have been determined based on the above referenced methods and assumptions.

development will set back off Highway 41A at least 600 to 1,000 linear feet.

7. Residential: The City's managing of growth and the ability to direct growth in the most beneficial areas will be dependent upon constructing roadways to open up the City to internal development.
8. Commercial: Commercial activity will be concentrated along Highway 41A. Highway 41A is predominately commercial and will continue to develop as a service retail area for Ft. Campbell.
9. Commercial: The commercial activity will continue to develop at intersections where major arteries intersect, examples are Kentucky 911 and Highway 41A, I-24 and Highway 41A, and Kentucky 115 and Stateline Road.
10. Commercial: When the proposed construction of the interchange occurs at Kentucky 115 and I-24, commercial development will occur on both sides of the interstate.
11. Commercial: Commercial activities are an enormous mainstay to the City economy as a result of Ft. Campbell. The ability of businesses to prosper is directly related to the proximity to the Post.

FUNCTION

Citizen Input: The following ideas, concerns, and perceptions are a result of a series of meetings with the Oak Grove Advisory Committee. The Advisory Committee is composed of citizens knowledgeable of important characteristics surrounding the development of Oak Grove. The result of the Committee's efforts is the Functional Component of the Comprehensive Plan addressing the community needs.

SOCIAL

POPULATION

1. Population: With the advent of sewer, the growth in population of the City of Oak Grove will be unlimited. Added with the resource of undeveloped land, the development of Oak Grove will only be limited by the resultant quality of life.
2. Population: The anticipated growth will place a great deal of stress and strain on the City. The City needs to develop in a manner which will help or alleviate the stress and strain placed on it by the growth in population.
3. Population: The growth of the population will initially be from the military base as most of the new residents will want to live

in close proximity to work. The locational advantages of the City should be enhanced and marketed to Ft. Campbell to stimulate the population growth.

4. Population: Population growth should take place through the capture of a large portion of the military market. Additional population growth should be sought through annexation, specifically the annexation of the military post and north of I-24.
5. Population: With the great potential of population growth, the City of Oak Grove needs to determine a manageable level of growth. By definition, manageable growth means an increase in population which can be supported with necessary services.
6. Population: A need exists to transform the residents of the City from a transient population to a permanent population. The ability to transform the population to a viable stable community will be slow and occur over a period of time.

HOUSING

1. Housing: The lack of sewer has been the prime limitation in housing development.

EDUCATIONAL FACILITIES

1. School: The potential growth anticipated for Oak Grove should dictate a need for a new school facility. Efforts need to be coordinated with the Christian County Board of Education to locate a school within the City.
2. School: The location of a school site should be near a residential neighborhood and planned so that incompatible traffic modes (e.g., pedestrian, vehicular, bus) do not mix.
3. School: The location of a school should be based on potential development which will be serviced by the school and planned so that the school is protected from incompatible land uses.
4. School: A definite need for a school will be demanded and supported by the 380 existing school age children and the potential 450 anticipated through the 801 Project.

MEDICAL FACILITIES

1. Medical Facilities: The City of Oak Grove is surrounded by an abundance of quality medical facilities. Health care services are located in Hopkinsville, Kentucky, Clarksville and Nashville,

Tennessee, and the military base. The need for medical facilities at this stage of community development is low. However, as the City grows, a medical facility could become more viable on an out-patient or same day surgery basis.

2. Medical Facilities: The majority of the population is military and their health care needs are taken care of by the Ft. Campbell medical facilities. This does not address the need of emergency services. Emergency services will be an important community provided service as the City grows. Currently the service is provided by the Christian County Ambulance service, with one (1) ambulance being stationed in the City. Population growth will exceed the units ability to serve and will require alternative methods of service.

URBAN SENSITIVE AREAS

1. Urban Sensitive Areas (Highway 41A): Highway 41A is the major access and gateway into the City and needs to be developed in such a way as to promote the City. If Highway 41A became congested and hazardous to drive, access and livability of the City will be degraded. Development along Highway 41A should be encouraged but coordinated with existing development. The coordination and planning of future commercial establishments should address access points and internal traffic flow of each development. Uncontrolled vehicular access can and does become a hindrance to growth and reduces the economic viability of the area.

2. Urban Sensitive Areas (Military Gates 4, 5, 6, and future 7): Highway 41A divides the City from its major economic resource, Ft. Campbell. The City is fortunate to have three (3) gates from the military post abutting the City and needs to utilize these access points to their fullest advantages. At the present time, Gate 4 is the major access point of the military installation with a daily traffic count of over 20,000 vehicular trips per day. The development of Oak Grove should be centered around the use of these gates to give internal access into the City when advantageous. As the 1980 census information indicates over

seventy (70) percent of the personnel living off-post live within fourteen (14) minutes of the post. The utilization of the gate access points as intersections opening up the internal part of the City can only enhance the developability of property within the City.

3. **Urban Sensitive Areas:** The manufactured homes (mobile home parks) are prevalent in Oak Grove. The economic dependence of the City upon the mobile home parks is a well known fact and continues to be a source of affordable housing for military personnel. However, real or unreal, the mobile home park is a negative stigma surrounding the community. The mobile home parks which provide affordable housing also give the community a transient nature as does the high number of military personnel residing in the City. The transient nature of the mobile homes coupled with the continual change in population prevents the City from reaching its full potential.

The sensitivity of these problems lies in the fact that Oak Grove through the years has relied heavily on the military residents and the mobile home, yet as the community (City) grows, the mobile home is seen as a limiting factor.

The City of Oak Grove needs to encourage the upgrading of the existing mobile home parks while placing an emphasis on the

6. Commercial: The willingness of most commercial establishments to locate along Highway 41A does not mean that other areas of the City will be void of commercial activity. Areas such as Kentucky 115 leading south towards Stateline Road and Kentucky 911 have the potential to be developed commercially.

Again, real commercial pressures will exist where Kentucky 911 intersects with Kentucky 115. Because of the odd shaped design of this intersection (does not intersect at a 90° angle), care needs to be taken to design commercial activities which take into account the skewed intersection.

7. Commercial: The development of commercial or retail services should emphasize the placement near or along a major arterial. The commercial activities should not be mixed with residential uses. By separating the commercial and residential land uses the integrity of both activities will be maintained.

8. Industrial: The City of Oak Grove has very little true industrial activity. The largest "industry" in the area is Ft. Campbell. Though Ft. Campbell is not an industry in the true sense of the word its benefits are similar to a major industrial manufacturer. The remaining industrial activities are somewhat limited. The limited amount of industry within Oak Grove reduces

PHYSICAL

TRANSPORTATION

1. Transportation: Currently, the transportation system of Oak Grove is composed of Highway 41A running north and south, Kentucky 115 running north and south, Kentucky 911 running east and west, and Stateline Road running east and west. Development has taken place along these transportation arteries and further development is expected. The problem occurs in that much of the property which lies within the confines of Highway 41A to the west and Kentucky 115 to the east has no planned transportation system providing access to internal properties. Internal transportation planning would aid and expedite the development of Oak Grove.

2. Transportation: The foundation of any transportation plan should utilize the gate facilities 4, 5, 6, and (7) (planned) as the center of all planning activities. The gates are the doors to Ft. Campbell and properly designed intersections can lead military personnel into the City. Intersection and reservation of land should be contemplated to coordinate Oak Grove's internal traffic movement with Ft. Campbell.

or management requirements of the City as the population increases. The development of a Comprehensive Plan, Zoning Ordinance, and Subdivision Regulations is an example of dealing with complex problems which result when the population grows and changes occur. The anticipation of these changes can greatly reduce the amount of problems which can arise.

6. Administration: The City of Oak Grove needs to investigate the possibility of an administrative officer or city manager who could devote full time efforts to the betterment of Oak Grove. The full time manager would also benefit the City in the administration of the City's growing services and service related problems.

RECREATION

1. Recreation: Much of the recreational needs for the residents of Oak Grove are provided by Ft. Campbell, Land Between the Lakes, or the State of Kentucky Parks system. This trend should continue. Though recreational facilities are an important part of a well rounded quality of life, other institutions and agencies are providing these services. The priority of recreation currently within the City is low, and the other heavy service demands, created by growth, placed on City funding will keep the recreational priority low.