

DRAFT

**Environmental Assessment for
Rehabilitation or Replacement of Buildings at the
Gulfport Job Corps Center
Gulfport, Mississippi**



**Submitted to:
U.S. Department of Labor
Gulfport Job Corps Center
3300 20th Street
Gulfport, Mississippi 39501**

October 2016

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ACRONYMS AND ABBREVIATIONS

1		
2		
3	AADT	Annual Average Daily Traffic
4	ABAAS	Architectural Barriers Act Accessibility Standard
5	ACHP	Advisory Council on Historic Preservation
6	ACM	Asbestos-containing materials
7	ADA	Americans with Disabilities Act
8	BEA	Bureau of Economic Analysis
9	BLS	U.S. Bureau of Labor Statistics
10	BMPs	Best management practices
11	CDBG	Community Development Block Grant
12	CEQ	Council on Environmental Quality
13	CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
14	CFR	Code of Federal Regulations
15	CH ₄	Methane
16	CO	Carbon monoxide
17	CO ₂	Carbon dioxide
18	CZMA	Coastal Zone Management Act
19	dBA	Decibels on the A-weighted scale
20	DNL	Day-Night Average Sound Level
21	DOL	U.S. Department of Labor
22	EA	Environmental Assessment
23	EIS	Environmental Impact Statement
24	EO	Executive Order
25	FEMA	Federal Emergency Management Agency
26	FONSI	Finding of No Significant Impact
27	GHG	Greenhouse gas
28	GSF	Gross square feet
29	GRPC	Gulf Regional Planning Commission
30	HABS	Historic American Building Survey
31	HFC	Hydrofluorocarbons
32	HUD	U.S. Department of Housing and Urban Development
33	HVAC	Heating, ventilation, and air conditioning
34	JCC	Job Corps Center
35	LBP	Lead-based paint
36	MDAH	Mississippi Department of Archives and History
37	MDEQ	Mississippi Department of Environmental Quality
38	NAAQS	National Ambient Air Quality Standards
39	NCBC	Naval Construction Battalion Center
40	NEPA	National Environmental Policy Act
41	NHPA	National Historic Preservation Act
42	NO ₂	Nitrogen dioxide
43	N ₂ O	Nitrous oxide
44	NRHP	National Register of Historic Places
45	O ₃	Ozone
46	OMS	Outcome Measurement System
47	OSHA	Occupational Safety and Health Administration
48	PCBs	Polychlorinated biphenyls
49	Pb	Lead
50	PFC	Perfluorocarbons
51	PM-2.5	Particulate<2.5 micrometers

1	PM-10	Particulate<10 micrometers
2	PY	Program year
3	RCRA	Resource Conservation and Recovery Act
4	ROI	Region of influence
5	SARA	Superfund Amendments and Reauthorization Act
6	sf	Square feet
7	SF ₆	Sulfur hexafluoride
8	SFHA	Special Flood Hazard Area
9	SHPO	State Historic Preservation Officer
10	SIP	State Implementation Plan
11	SO ₂	Sulfur dioxide
12	TSCA	Toxic Substances Control Act
13	U.S.C.	United States Code
14	USEPA	U.S. Environmental Protection Agency

1 **1.0 INTRODUCTION**
2

3 The Job Corps is a national residential training and employment program administered by the
4 U.S. Department of Labor (DOL). The Job Corps was created during the administration of
5 President Lyndon B. Johnson in 1964 as part of President Johnson's War on Poverty and Great
6 Society initiatives that sought to expand economic and social opportunities for Americans,
7 especially minorities and the poor. It was modeled on the Depression-era Civilian Conservation
8 Corps of the 1930s, which provided room, board, and employment to thousands of unemployed
9 youth. The Job Corps was originally established by the Economic Opportunity Act of 1964.
10 Authorization for the program continued under the Comprehensive Employment Training Act,
11 then Title IV-B of the Job Training Partnership Act, and is currently provided for under the
12 Workforce Innovation and Opportunity Act of 2014.

13
14 The Job Corps' mission for eligible young adults is to teach them the skills they need to become
15 employable, prepare them for careers, and further their education. The Job Corps addresses
16 the multiple barriers to employment faced by disadvantaged youth throughout the United States.
17

18 In conjunction with this national strategy, DOL proposes to redevelop the Gulfport Job Corps
19 Center (JCC) so that it can provide training for the 280-student capacity for which it was
20 originally designed. This project would support and enhance the Job Corps' educational and
21 training mission and ensure that its facilities continue to provide an optimal environment for
22 students and Job Corps personnel.

1 **2.0 PURPOSE OF AND NEED FOR ACTION**

2
3 **2.1 Project Location**

4
5 The Gulfport JCC is located at 3300 20th Street in Gulfport, Mississippi (Figures 1 and 2). It is
6 situated on 8.07 acres of land, approximately 1 mile from the Gulf of Mexico.

7
8 **2.2 Background**

9
10 The Gulfport JCC opened in 1978, utilizing buildings that were initially constructed in 1954 as a
11 high school for African-American students, known as the 33rd Avenue High School. The City of
12 Gulfport owns the property, with the DOL holding a 30-year lease that expires in 2028.

13
14 The Gulfport JCC campus consists of 15 buildings that contain housing, classrooms, vocational
15 training space, food service, administrative, medical/dental, maintenance, and warehouse
16 facilities (Figure 3). Buildings 1, 2, and 5, originally built as the 33rd Avenue High School, were
17 completed in 1954 and are considered eligible for the National Register of Historic Places
18 (NRHP). Buildings 9, 10, and 11 were constructed in 1996, 1999, and 2014, respectively. The
19 original buildings (Buildings 1, 2, and 5) sustained extensive damage during Hurricane Katrina,
20 requiring the Gulfport JCC to close for approximately 3.5 years. These buildings have not been
21 rehabilitated.

22
23 The Gulfport JCC provides career technical training in vocational trades. It serves young people
24 of need from Mississippi, Alabama, and Louisiana. In the three program years (PYs) prior to its
25 closing in late August 2005 as a result of heavy damage caused by Hurricane Katrina, the
26 Gulfport JCC operated at full capacity (280 students). In April 2009, the Gulfport JCC reopened
27 with a decreased enrollment (107 students) due to the reduction in space for education/training,
28 administration, medical/dental, and food service. Since that time, it has utilized two modern
29 dormitories and eight modular buildings that were put into service to compensate for the loss of
30 use of Buildings 1, 2, and 5, which now sit vacant, damaged, and vulnerable to the elements.
31 The modular buildings are used for administration, medical/dental services, food service, and
32 classroom space. They were intended to be used for 3 to 5 years; however, they have now
33 been in use for 7 years. The facility currently lacks hands-on vocational training space and
34 recreation space for students.

35
36 JCC students are trained to be able to earn industry-based certifications in high-demand
37 occupations. Trades currently offered at the Gulfport JCC include Certified Nursing Assistant,
38 Clinical Medical Assistant, Medical Office Support, and Electrical. Redevelopment of the site to
39 add permanent space would allow the Gulfport JCC to train more students than it can currently
40 accommodate, as well as to train students for employment in additional trades to meet identified
41 needs in high-demand occupations.

42
43 In the State of Mississippi, over 7,000 youth have contacted the Job Corps over the last 14
44 months, seeking to enroll in JCC programs. In addition, over 9,000 eligible youth who reside in
45 Louisiana and Alabama have contacted Job Corps to enroll. Based on national averages, about
46 75 percent of those youth (approximately 12,000) are actually eligible to enroll in Job Corps
47 based on age, income, and other requirements. Since 2015, the Gulfport JCC and the other
48 JCCs in the State of Mississippi have provided services to 1,501 of the approximately 12,000
49 eligible students.

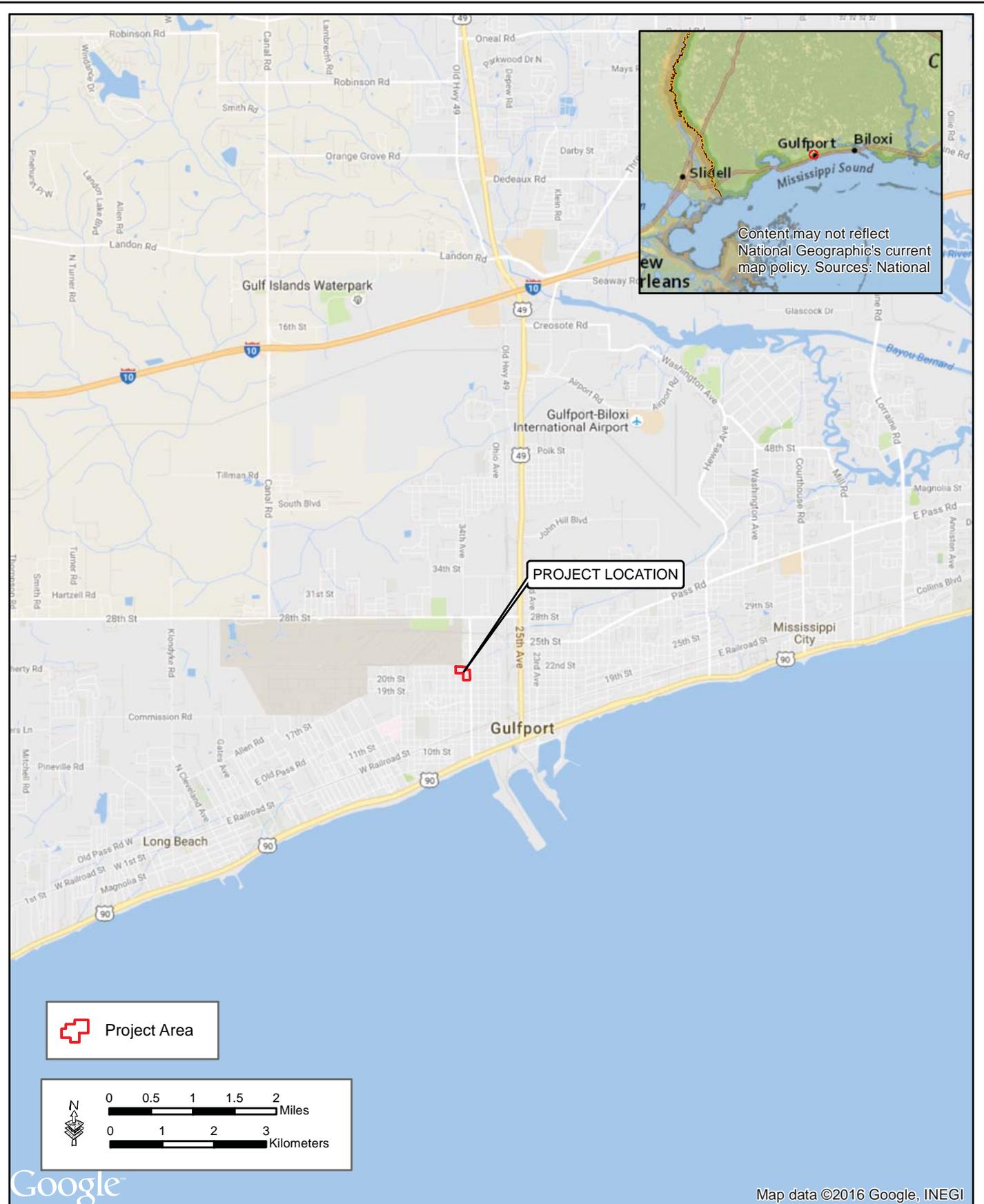


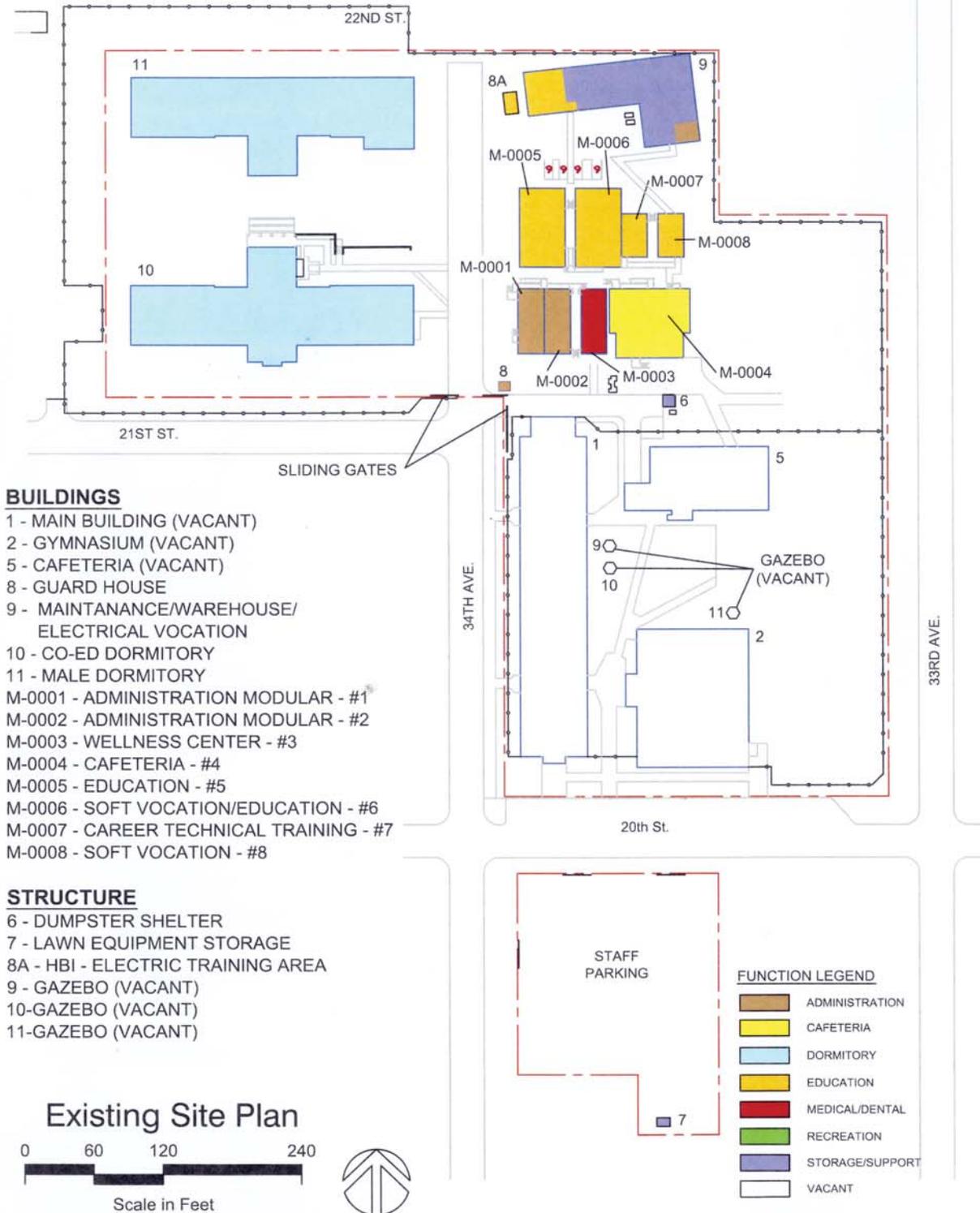
Figure 1. Vicinity Map



August 2016

Gulfport Job Corps Center

Gulfport, Mississippi



Source: Gulfport Job Corps Center, Facility Planning Report, Volume 1

Figure 3. Gulfport JCC Existing Site Plan

1 The Job Corps' Outcome Measurement System (OMS) is a measure of center performance.
 2 The ranking is based on

- 3
- 4 • Placement in employment or higher education
- 5 • Attainment of a degree or certificate
- 6 • Literacy and numeracy gains
- 7 • Efficiency/cost per participant
- 8

9 The OMS indicates that the Gulfport JCC is providing quality job training to the students it now
 10 serves. Since reopening after Hurricane Katrina, the Gulfport JCC has ranked well nationally,
 11 with tremendous improvement in OMS performance. The center moved from an overall OMS
 12 ranking of 109 out of 122 centers in PY 2005 to a rank of 4 out of 125 centers in PY 2014. The
 13 most recent OMS ranking for Gulfport (through February 2016) is a rank of 6 out of 126 centers.

14
 15 **2.3 Purpose and Need**

16
 17 The purpose of the Proposed Action is to redevelop the Gulfport JCC so that it meets the
 18 original design capacity/contract strength of 280 students, alleviating a portion of the enrollment
 19 demand.

20
 21 The need for the Proposed Action is to add approximately 93,000 gross square feet (GSF) of
 22 permanent, functional space at the Gulfport JCC (Table 1). There is a tremendous demand for
 23 Job Corps services in the region served by the Gulfport JCC. Since 2015, the Gulfport JCC and
 24 the other JCCs in the State of Mississippi have provided services to 1,501 of the approximately
 25 12,000 eligible students. The modular buildings now being used for administration, classrooms,
 26 and food service are beyond their intended service life span, and the campus currently lacks
 27 hands-on vocational space and recreation space for students. Redevelopment of the Gulfport
 28 JCC to contract strength capacity would provide training for an additional 173 students for a
 29 total of 280 students, 220 of which would be housed on campus in dormitories and 60 of which
 30 would be day students. Functional space to be added would include spaces for administration,
 31 medical/dental services, classrooms, vocational training, food service, and recreation facilities.
 32 This additional space, along with the existing permanent dormitory structures, would provide the
 33 space required to meet the DOL's suggested program guidelines for full operation of the
 34 Gulfport JCC at the pre-Katrina level (280 students).

35
 36 **Table 1. DOL Program Guidelines for Space at JCCs**

Function	Total GSF for 280 Students	GSF per Student
Main Building (Administration, Education, Medical/Dental)	32,718	116.9
Education – Hard Vocational	23,100	82.5
Storage/Maintenance	6,847	24.5
Food Service	9,072	32.4
Recreation	18,270	65.3
Energy Plant	2,800	10.0
Total	92,807	331.6

37

1 **2.4 Scope and Content of the Environmental Assessment**
2

3 This Environmental Assessment (EA) analyzes the effects of rehabilitation or replacement of
4 buildings at the Gulfport JCC. This EA is being conducted in accordance with the National
5 Environmental Policy Act (NEPA) of 1969 (42 United States Code [U.S.C.] 4321 et seq.), the
6 Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR]
7 1500 - 1508), and Department of Labor Environmental Policy Act (NEPA) Compliance
8 Procedures (29 CFR 11.11). This EA identifies the potential environmental effects of the
9 proposed action alternatives and includes discussions of any mitigation and permit
10 requirements, findings, and conclusions in accordance with NEPA.
11

12 **2.5 Decision to Be Made**
13

14 The DOL will decide whether or not to redevelop the Gulfport JCC and, if so, whether the action
15 qualifies for a Finding of No Significant Impact (FONSI) under NEPA or whether an
16 Environmental Impact Statement (EIS) must be prepared.
17

18 **2.6 Public Participation**
19

20 NEPA regulations require an early and open process for determining the scope of issues that
21 should be addressed prior to implementation of a Proposed Action. The DOL initiated the
22 process by sending letters to various Federal and state agencies to notify them about the
23 planned public scoping meeting. Also on May 29, 2016, a Public Meeting Notice announcing
24 the public meeting was published in the *Biloxi Sun Herald*. Copies of the agency
25 correspondence letters and public meeting notice are included in Appendix A.
26

27 The public scoping meeting was held on June 14, 2016, in Gulfport, to discuss the proposed
28 project. A summary of the scoping meeting is included in Appendix B. Public comments
29 received at the meeting were considered when preparing this EA. The EA is provided to the
30 public for a 30-day review and comment period. The availability of the EA for review was
31 announced through a news release and notice of availability letters to agencies and interested
32 parties. This EA is available at the Gulfport Public Library, 1708 25th Avenue, Gulfport, MS
33 39501 and at <http://www.jobcorps.gov/home.aspx>. Comments received by mail or through
34 electronic communication will be incorporated into the Final EA.

1 **3.0 ALTERNATIVES**

2
3 Three action alternatives are currently under consideration to satisfy the purpose and need. In
4 addition, the No Action Alternative is carried forward, as required by CEQ. The No Action
5 Alternative serves as the baseline against which the action alternatives are compared.
6

7 **3.1 Alternative 1: Rehabilitate Existing Buildings**

8
9 Under Alternative 1, the DOL would rebuild the
10 existing permanent structures, with new interior
11 structural elements (Figure 4). Buildings 1, 2, and
12 5, with a total of 57,340 GSF, would undergo major
13 renovations, but would retain their current outward
14 façades, as much as possible, in keeping with the
15 historical nature of those buildings. Building 1
16 would be the primary administration and education
17 building (Photograph 1). Building 2, the
18 gymnasium, would be the recreation building, and
19 Building 5 would remain the cafeteria. Building 9
20 (storage and maintenance) would be demolished,
21 and a new storage and maintenance building would
22 be built. Buildings 10 and 11 (dormitories) would
23 be used as is. All modular buildings currently being
24 used on-site would be removed. A new, 15,000 GSF building would be constructed to
25 accommodate vocational training, providing shop-related skills training for occupations in
26 demand. The new vocational building would be similar in outward appearance to Buildings 1
27 and 2. Alternative 1 would provide 82,340 GSF, excluding dormitory space. Design and
28 construction for Alternative 1 would be expected to take approximately 36 months, with 18
29 months for each phase.
30



31 **Photograph 1. Building 1 non-street-facing**
32 **façade**

33 A central energy plant to serve the campus would be added. Parking spaces for 90 vehicles
34 would be available across 20th Street from Buildings 1 and 2 and within the site in spaces
35 currently designated for parking.
36

37 While Alternative 1 meets the purpose and need, several challenges are associated with this
38 Alternative, including the following:

- 39 • Although the overall GSF of a renovated
40 Building 1 compares favorably to that
41 which would be built as part of the design
42 of new structures (Alternative 2), the
43 restrictions inherent in renovating the
44 existing building would yield less usable
45 space and result in a less than optimal
46 space layout for the various functions that
47 the Job Corps needs. These restrictions
48 include the following:
 - 49 ○ Overly wide corridors subtract from
50 the total usable space (Photograph 2).



51 **Photograph 2. Building 1 interior**
52 **corridor/stairwell**

Gulfport Job Corps Center

Gulfport, Mississippi

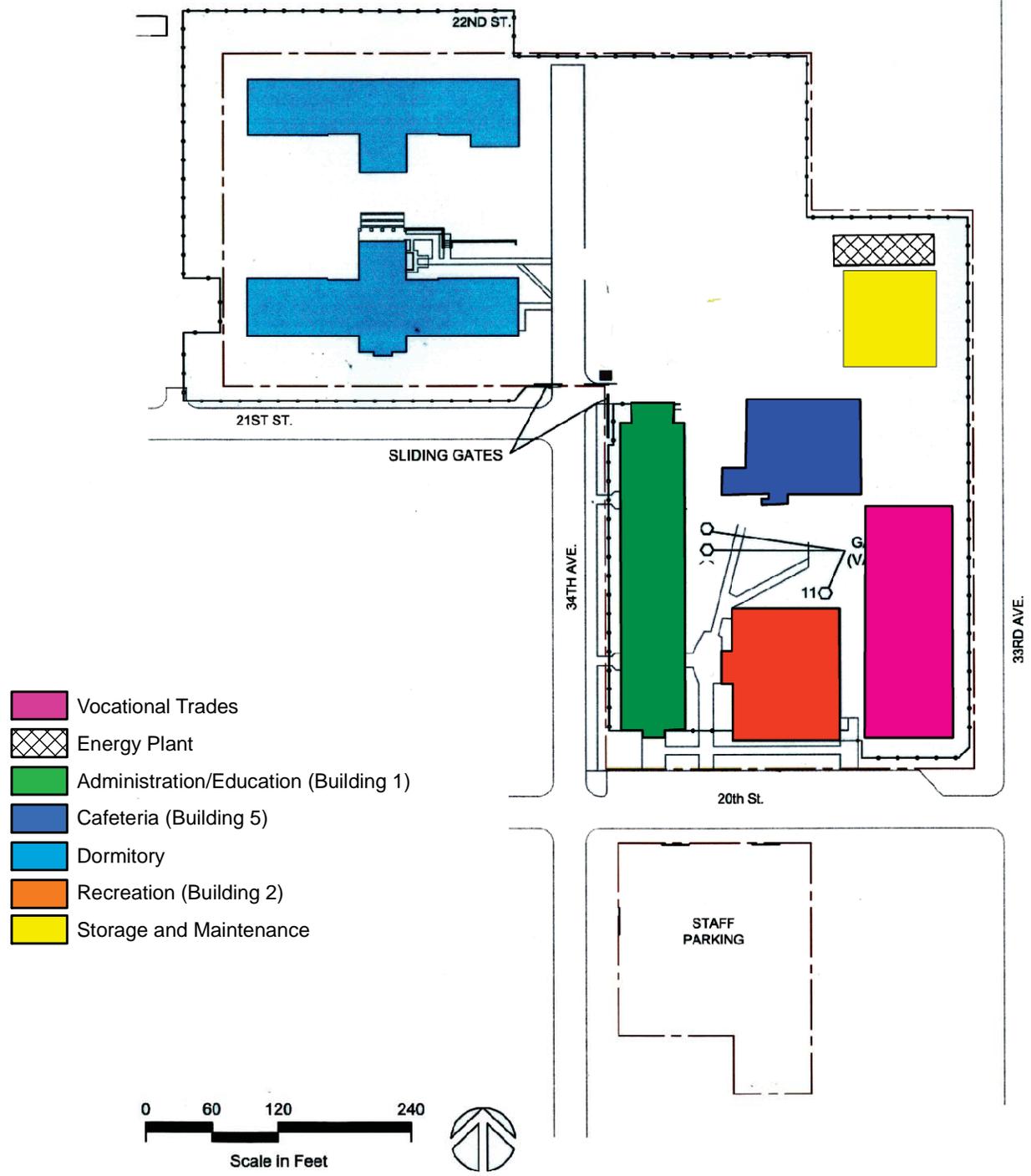


Figure 4. Alternative 1 Site Plan

- 1 ○ Renovation of the building to comply with accessibility guidelines for the two half-
2 stairwells on the lower floor of the building subtracts from the amount of usable
3 space.
4 ○ Restrictions imposed by the corridor walls result in the separation of related
5 administrative functions.
6 ○ Renovating the existing building results in less than optimal classroom sizes for
7 some soft trade courses, such as Nurse’s Assistant.
8 ○ The layout makes it more difficult to maintain separation of incoming students from
9 the remainder of the student body during their orientation period, something that is
10 considered essential to providing new students the opportunity to assimilate to their
11 new environment.
12 ○ The intrusion of the new concrete shear walls for stabilization of the structures will
13 encroach on currently usable space.
- 14 ● It is estimated that the reduction in usable space in Building 1 could be as much as 5
15 percent, when compared to that for a new structure. The resulting cumbersome nature of
16 the functional layout of the renovated Building 1 is difficult to measure, but carries with it
17 inefficiencies that affect the day-to-day function of Gulfport JCC staff and fails to provide
18 an optimal space layout that enhances the environment for the students at the Center.
- 19 ● Building 2, the gymnasium, does not meet current program standards for recreation,
20 providing only 53.6 GSF per student compared to the 65.3 GSF per student
21 recommended by DOL program guidelines, or approximately 18 percent less space than
22 the program guidelines recommend. It lacks space for locker rooms, arts and crafts,
23 weight rooms, and aerobic rooms. The existing facility spaces that served as locker
24 rooms in the past (located under the bleachers) are not conducive to the Job Corps
25 environment in terms of providing supervision and providing comfortable spaces that
26 have natural light.
- 27 ● Rehabilitation of Building 2, the gymnasium, does not adhere to the campus design that
28 Job Corps has found to best serve the students. Placement of the recreation building
29 near the dormitories enhances the usage of the building during evening and weekend
30 hours, which is advantageous to the students incorporating the social aspects of
31 recreation into their overall Job Corps experience.
- 32 ● Space available for construction of the vocational trades building is limited, resulting in
33 an estimated 35 percent less space for training for trades than is recommended by DOL
34 program guidelines. The space available for a vocational trades building is limited by 1)
35 the location of the existing cafeteria (Building 5); 2) the need to construct the vocational
36 trades building in a location that provides the required street access for the shop bays;
37 and 3) City of Gulfport setback
38 requirements. As a result, the vocational
39 trades building would have four shop
40 bays for training instead of the desired
41 seven shop bays, thereby limiting
42 training opportunities for Gulfport JCC
43 students and impacting the amount and
44 types of training provided to meet the
45 needs of companies in the region.
- 46 ● Building 5, the cafeteria (Photograph 3),
47 does not meet current standards for food
48 service, providing only 24.4 GSF per
49 student, compared to the 32.4 GSF per
50 student recommended by DOL program



Photograph 3. Building 5 (cafeteria)

1 guidelines, or approximately 25 percent less space than the program guidelines
2 recommend. The smaller size results in more crowded conditions and results in three
3 sittings rather than the desired two sittings for lunch, when the non-residential students
4 are on campus. Other deficiencies include restrictions on the amount of food service
5 equipment due to the limited space.

- 6 • There are considerable uncertainties regarding the structural integrity/stability of key
7 structural elements in Buildings 1 and 2.
 - 8 ○ The need during the design phase to further examine the integrity of the tubular
9 steel support columns in those buildings could result in the need for large-scale
10 replacement and reinforcement of those structural elements.
 - 11 ○ Numerous I-beams and exterior columns show signs of excessive deterioration
12 due to weather exposure.
 - 13 ○ The entire roof system would require replacement and anchoring to prevent future
14 hurricane damage.
- 15 • The existing buildings lack sufficient lateral stability to resist wind loads during a
16 hurricane, and reinforcement of the walls and foundations would be necessary (if
17 possible) to meet current code standards for wind resistance. Reinforcement of the
18 structural steel framing, construction of concrete shear walls, and potentially additional
19 foundation stabilization for proper transfer of lateral loads (i.e., loads due to wind) as
20 required by the current building code would be required.
- 21 • The cafeteria building would require extensive modifications to the structural steel
22 framing system to meet current codes. The entire roof system would need to be
23 replaced and fastened to the tops of the walls. In addition, concrete shear walls would
24 be required along the east and west walls of the structure to withstand lateral (wind)
25 loads, which would further restrict usable space. As for all buildings, testing of the
26 foundation system would be required during the design phase.

27 28 **3.2 Alternative 2: New Construction**

29
30 Alternative 2 involves new construction (Figure 5). Buildings 1, 2, 5, and 9 would be
31 demolished, all modular buildings would be removed, and five new buildings would be
32 constructed. Alternative 2 would result in a modern Job Corps instructional campus with a total
33 area of 98,920 GSF, excluding dormitory space, built in accordance with the DOL program
34 guidelines outlined previously in Table 1. The new construction would provide spaces for
35 administration, classrooms, vocational training, food service, and recreation. Only the existing
36 dormitory buildings would be retained (Buildings 10 and 11). Design and engineering for
37 Alternative 2 were completed in 2011; however, modifications would be needed to meet current
38 design codes and energy standards.

39
40 A central energy plant to serve the campus would be added to satisfy the Federal energy
41 savings mandate. Parking spaces for 90 vehicles would be available across 20th Street from
42 Buildings 1 and 2 and within the site in spaces currently designated for parking. Design would
43 take an estimated 12 months, and construction would take an estimated 22 months.

44
45 Alternative 2 reflects the highest functioning, most desirable plan for Job Corps, both in terms of
46 the student experience and satisfaction, and the ability of Job Corps to keep pace with the
47 demands of the modern job training environment. It is the only alternative that can provide the
48 full seven training shop bays for the vocational training building, as part of an overall increase of
49 13,000 square feet above the Alternative 1 space program, in order to better meet the training
50 needs for the Job Corps and better benefit Gulfport JCC students and area employers.

Gulfport Job Corps Center

Gulfport, Mississippi

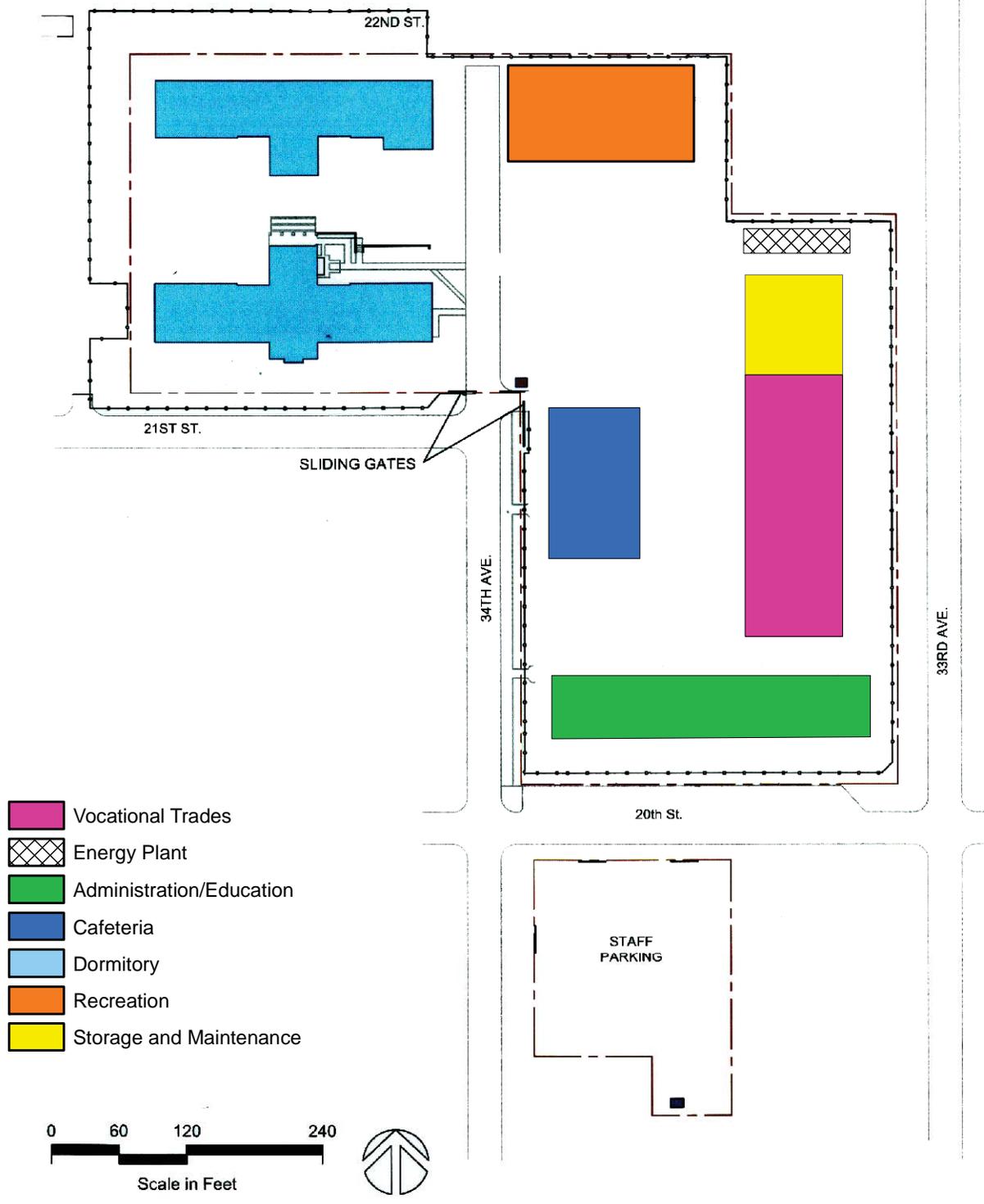


Figure 5. Alternative 2 Site Plan

Challenges associated with new construction include the following:

- Buildings 1, 2, and 5 were completed in 1954 as a high school for African-American students, known as the 33rd Avenue High School. The Mississippi State Historic Preservation Officer (SHPO) has ruled that the structures are eligible for listing in the NRHP. The school's alumni group does not want the buildings demolished and is seeking renovation of the buildings.

3.3 Preferred Alternative (Alternative 3): Retain Existing Façades

The Preferred Alternative would retain the historic appearance of the Building 1 (Photograph 4) and Building 2 (Photograph 5) façades while providing modern facilities behind the façades (Figure 6). It would retain the street-facing façades of Buildings 1 (south and west) and 2 (south), and new building(s) would be constructed behind the façades to provide administration, educational, medical/dental, and recreation spaces that meet the needs of the Gulfport JCC and DOL program guidelines. Building 5, the cafeteria, would be demolished and replaced by a new, modern cafeteria, and a new building would be constructed for vocational training for shop-related trades and for storage and maintenance. The dormitories (Buildings 10 and 11) would be retained. A central energy plant to serve the campus would be added to satisfy the Federal energy savings mandate. Parking spaces for 90 vehicles would be available across 20th Street from Buildings 1 and 2 and within the site in spaces currently designated for parking.

The Preferred Alternative would result in a modern Job Corps instructional campus with a total area of 95,200 GSF, excluding dormitory space. While the total GSF for the Preferred Alternative meets or exceeds the total DOL program guidelines shown previously in Table 1, the GSF for vocational trades building would be approximately 19 percent smaller than DOL program guidelines recommend, thereby impacting the training the Gulfport JCC could provide. The design period for Alternative 3 would be approximately 18 months, and construction would take an estimated 26 months.



Photograph 4. Building 1 façade facing 20th Street



Photograph 5. Building 2, gymnasium, façade facing 20th street

Gulfport Job Corps Center

Gulfport, Mississippi

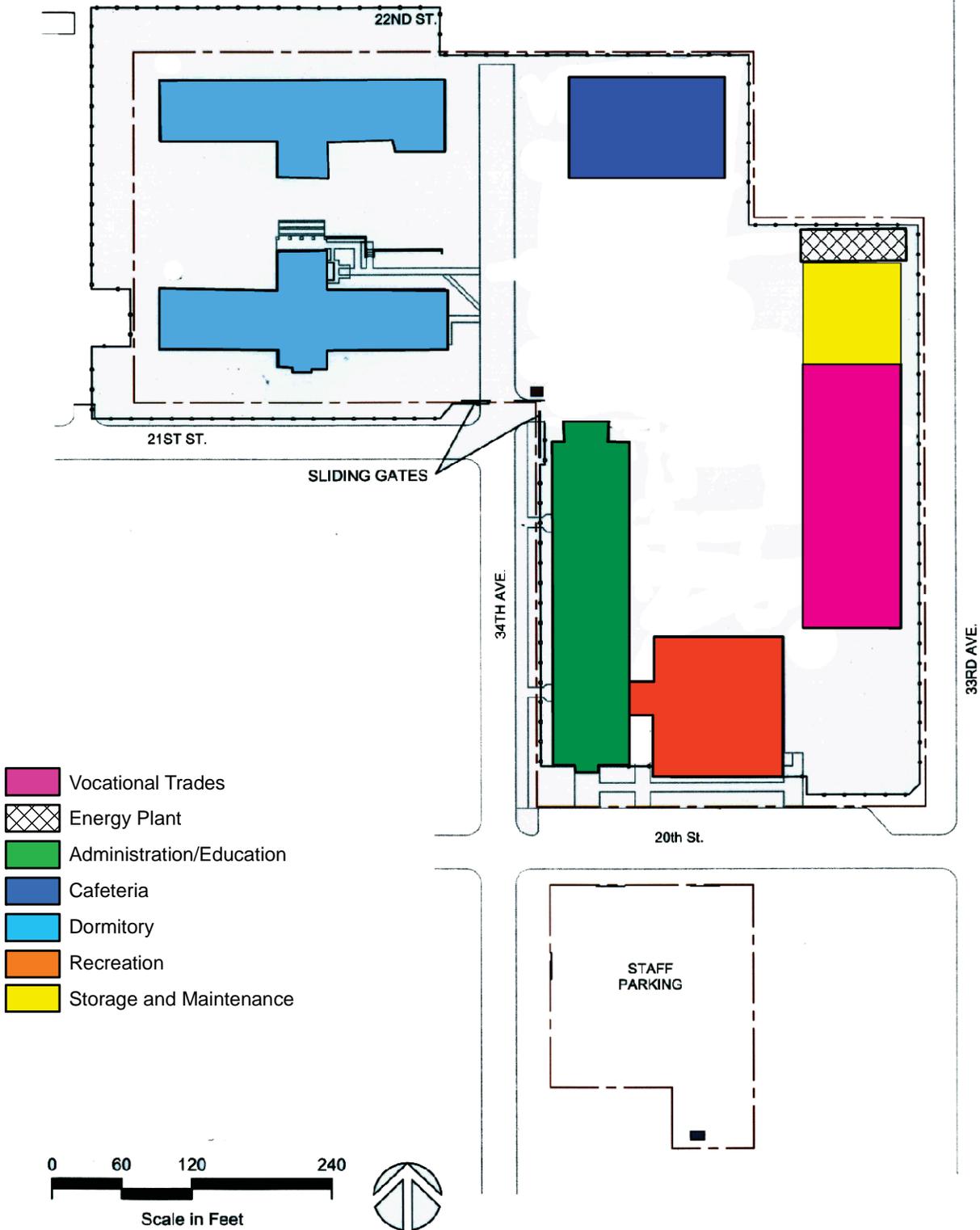


Figure 6. Preferred Alternative Site Plan

1 Challenges associated with the Preferred Alternative include the following:
2

- 3 • Construction of new structures behind the façades of Buildings 1 and 2 would require
4 extensive buttressing to either tie the existing façades into the new buildings or
5 independently support the existing facades in order to build new buildings behind them.
6 The predominant portions of the existing buildings located behind the facades to remain
7 would be demolished to allow room for the construction of new buildings.
- 8 • Working with the existing façades adds additional costs and time, when compared with
9 costs and time associated with Alternative 2.
- 10 • Working with the existing façades imposes size, location, and building configuration
11 restrictions for the new buildings.
- 12 • GSF would be similar to DOL program guidelines for all functions except hard vocational
13 education/training; however, building configuration restrictions result in less usable
14 space and a less than optimal layout for campus buildings, when compared with
15 Alternative 2.
- 16 • The amount of available land and City of Gulfport building setback requirements limit the
17 amount of space available for the hard vocational trades training building, resulting in a
18 facility that would be substantially smaller than DOL program guidelines recommend.
19 The 19 percent less space (approximately 80 feet in building length) means that the
20 Gulfport JCC would have five shop bays for training, instead of the optimal seven shop
21 bays that would be built under Alternative 2.
22

23 **3.4 Alternative 4: No Action Alternative**

24
25 The No Action Alternative would maintain the Gulfport JCC campus in its current configuration
26 and functionality. The dormitories and the modular buildings would be retained and used as is,
27 to the extent feasible for the temporary modular structures. The student capacity would remain
28 at 107 students. Training in vocational trades, other than electrical, would remain unavailable to
29 students. Buildings 1, 2, and 5 would continue to deteriorate due to weather exposure until they
30 are deemed to be a health and safety hazard, at which time they would likely need to be
31 considered candidates for demolition. The No Action Alternative does not meet the purpose of
32 and need for the Proposed Action, but has been carried forward for analysis as required by the
33 CEQ regulations.
34

35 **3.5 Alternatives Considered but Eliminated**

36 **3.5.1 Building Stabilization and Preservation**

37 This alternative would strengthen Buildings 1, 2, and 5 with interior shoring to hold up the
38 structures. Some of the previously damaged interior sections would be removed and the
39 buildings would be ventilated to prevent further mold damage. The building roofs and window
40 openings would be covered or otherwise stabilized to prevent further water damage. After
41 stabilization and protection from the elements, the buildings would remain vacant and unused.
42 This alternative does not meet the purpose of and need for the Proposed Action.
43
44

45 **3.6 Comparison of Alternatives**

46
47 A summary of the alternatives is included in Table 2, and a comparison of the square footage
48 that would be provided under each of the alternatives is included in Table 3. Table 4 provides a
49 summary of impacts by alternative.

Table 2. Summary of Alternatives

	Alternative 1 Rehabilitate Existing Buildings	Alternative 2 New Construction	Alternative 3 (Preferred) Retain Existing Façades	Alternative 4 No Action Alternative
Renovation	Rehabilitate Buildings 1, 2, and 5	No renovation	Retain façades for Buildings 1 and 2, renovating as necessary to provide structural stability	No renovation
Demolition/Removal	Remove modular buildings and demolish Building 9	Demolish Buildings 1, 2, 5, and 9 and remove all modular buildings	Demolish Buildings 1 and 2, except for the front façades. Demolish Buildings 5 and 9. Remove all modular buildings.	No demolition/removal
New Construction	Construct vocational building, storage/maintenance building, and new energy plant.	All new construction	Construct new buildings behind the façades of Buildings 1 and 2. Construct new cafeteria, hard vocational building, storage and maintenance building, and energy plant.	No new construction
Structural Integrity of Buildings	Significant reinforcement would be needed to maintain structural integrity.	New construction would meet current structural requirements.	Significant difficulty to maintain structural integrity of façades during construction	Buildings would continue to deteriorate
Estimated Total Cost	\$35,000,000	\$28,000,000	\$30,000,000	No additional costs would occur unless buildings reach a level of deterioration that would require demolition
Time Required for Completion	36 months	34 months	44 months	Not applicable; no construction needed
Functionality for Job Corps	Below average	High	Above average	Not applicable

Table 3. Gross Square Feet by Alternative

Function	DOL Program Guidelines (GSF for 280 Students)	Alternative 1 Rehabilitate Existing Buildings	Alternative 2 New Construction	Alternative 3 (Preferred): Retain Existing Façades	Alternative 4 No Action Alternative
Administration, Education, Medical/Dental	32,718	35,520	35,620	36,800	13,000
Education/Training – Hard Vocational	23,100	15,000	24,500	18,800	1,200
Storage and Maintenance	6,847	7,200	6,500	7,200	6,000
Food Service	9,072	6,820	9,280	9,280	3,000
Recreation	18,270	15,000	20,320	20,320	0
Energy Plant	2,800	2,800	2,800	2,800	0
Total	92,807	82,340	98,920	95,200	23,200

Table 4. Summary of Impacts

Resource	Alternative 1: Rehabilitate Existing Buildings	Alternative 2: New Construction	Alternative 3 (Preferred): Retain Existing Façades	Alternative 4: No Action Alternative
Cultural Resources	No adverse impacts on the existing buildings, based on a previous determination by the Mississippi SHPO.	Permanent, major adverse impacts on historic buildings. Mitigation could be provided.	Adverse impacts on historic buildings would be resolved through mitigation, so there would be no significant impacts on cultural resources.	Existing historic buildings would continue to deteriorate, resulting in permanent, major adverse effects on cultural resources.
Land Use and Aesthetics	Minor permanent impacts on land use with new construction of a vocational trades training building on the site. Beneficial impacts on aesthetics with rehabilitation of the damaged buildings.	Minor permanent impacts on land use with new construction on the site. Beneficial impacts on aesthetics with new buildings replacing the damaged buildings.	Minor permanent impacts on land use with new construction of a vocational trades training building on the site. Beneficial impacts on aesthetics with rehabilitation of the damaged buildings.	No impacts on land use. Permanent, adverse impacts on aesthetics for area residents, as well as students, faculty, and staff at the Gulfport JCC.
Water Resources	Negligible impacts on water resources or adjoining waterways.	Negligible impacts on water resources or adjoining waterways.	Negligible impacts on water resources or adjoining waterways.	No construction, so no impacts on water resources.
Air Quality	Temporary, minor air quality impacts during construction.	Temporary, minor air quality impacts during construction.	Temporary, minor air quality impacts during construction.	Potential minor impacts on air quality from asbestos-containing materials (ACM) if a significant wind event causes a roof fracture.
Noise	Temporary, minor noise impacts during construction. Operations would result in negligible noise impacts.	Temporary, minor noise impacts during demolition and construction. Operations would result in negligible noise impacts.	Temporary, minor noise impacts during demolition and construction. Operations would result in negligible noise impacts.	No noise impacts unless condemnation and demolition occurs.
Utilities	Negligible, permanent impacts on utilities.	Negligible, permanent impacts on utilities.	Negligible, permanent impacts on utilities.	No impacts; no utilities used.
Hazardous Materials	Temporary, negligible impacts from hazardous substances or wastes.	Temporary, negligible impacts from hazardous substances or wastes.	Temporary, negligible impacts from hazardous substances or wastes.	Potential minor impacts from ACM if a significant wind event causes a transite panel sub-roofing fracture.
Health and Safety	Construction-related impacts would be temporary and negligible. Permanent, moderate effects on health and safety during operations.	Construction-related impacts would be temporary and negligible. Negligible impacts on health and safety during operations.	Construction-related impacts would be temporary and negligible. Negligible impacts on health and safety during operations.	Potential minor health impacts from ACM if a significant wind event causes a transite panel sub-roofing fracture.

Table 4, continued

Resource	Alternative 1: Rehabilitate Existing Buildings	Alternative 2: New Construction	Alternative 3 (Preferred): Retain Existing Façades	Alternative 4: No Action Alternative
Transportation and Traffic	Temporary, minor adverse impact associated with construction. Permanent, minor adverse impacts associated with additional employees and additional day students.	Temporary, minor adverse impacts associated with construction. Permanent, minor adverse impacts associated with additional employees and additional day students.	Temporary, minor adverse impacts associated with construction. Permanent, minor adverse impacts associated with additional employees and additional day students.	No impacts on traffic.
Socioeconomics	Training would remain limited until completion; minor positive impacts associated with construction if local labor is hired or building materials are purchased locally. Permanent, minor positive impacts associated with additional employment at the Gulfport JCC. Positive impacts if any local residents become students. No adverse environmental justice impacts on the high-minority, high-poverty population living in the census tract surrounding the Gulfport JCC. No adverse impacts on children.	Training would remain limited until completion; minor positive impacts associated with construction if local labor is hired or building materials are purchased locally. Permanent, minor positive impacts associated with additional employment at the Gulfport JCC. Positive impacts if any local residents become students. Permanent, adverse impacts on the high-minority, high-poverty population living in the census tract surrounding the Gulfport JCC, as the NRHP-listed structures would be demolished. No adverse impacts on children.	Training would remain limited until completion; minor positive impacts associated with construction if local labor is hired or building materials are purchased locally. Permanent, minor positive impacts associated with additional employment at the Gulfport JCC. Positive impacts if any local residents become students. No adverse impacts on the high-minority, high-poverty population living in the census tract surrounding the Gulfport JCC.	Training would remain limited. Impacts on disadvantaged regional population would continue due to limited Gulfport JCC enrollment. Residents of the high-minority, high-poverty census tract surrounding the JCC would watch the buildings in their neighborhood continue to deteriorate. Potential minor health impacts for nearby residents from asbestos-containing materials (ACM) if a significant wind event causes a transite panel sub-roofing fracture.

1 **4.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES**
2

3 This section provides a description of the natural and human environments that exist around the
4 Gulfport JCC and the potential impacts of the action alternatives and the No Action Alternative
5 outlined in Section 3.0 of this document. Only those resources that have the potential to be
6 affected by any of the alternatives considered have been analyzed, as per CEQ guidance (40
7 CFR 1501.7[3]).
8

9 Resources to be analyzed in this EA include the following:

- 10 • Cultural Resources
- 11 • Land Use and Aesthetics
- 12 • Water Resources
- 13 • Air Quality
- 14 • Noise
- 15 • Utilities Infrastructure
- 16 • Hazardous Materials
- 17 • Health and Safety
- 18 • Traffic and Transportation
- 19 • Socioeconomics
- 20

21
22 Resources not analyzed in this EA include geology and soils, and biological resources.
23 Geology and soils were dismissed because the entire Gulfport JCC site is previously disturbed
24 and filled and no surface soil disturbance is planned for any alternatives, so there would be no
25 impacts. Biological resources were dismissed because the entire project site is urban disturbed
26 habitat with no natural vegetation or wildlife.
27

28 The terms “effect” and “impact” are used synonymously in this EA. Effects may be beneficial or
29 adverse and may apply to the full range of natural, aesthetic, historic, cultural, and economic
30 resources within the project area and the surrounding area. They can be either directly related
31 to the action or indirectly caused by the action. Direct effects are caused by the action and occur
32 at the same time and place (40 CFR § 1508.8[a]). Indirect effects are caused by the action and
33 are later in time or further removed in distance but are still reasonably foreseeable (40 CFR §
34 1508.8[b]).
35

36 Effects are also expressed in terms of duration. The duration of short-term or temporary
37 impacts is considered to be 1 year or less. Long-term impacts are described as lasting beyond
38 1 year but typically less than 10 years. Impacts that potentially continue in perpetuity will be
39 described as permanent.
40

41 Whether an impact is significant depends on the context in which the impact occurs and the
42 intensity of the impact (40 CFR § 1508.27). The context refers to the setting in which the impact
43 occurs and may include society as a whole, the affected region, the affected interests, and the
44 locality. Impacts on each resource can vary in degree or magnitude from a slightly noticeable
45 change to a total change in the environment. For the purpose of this analysis, the intensity of
46 impacts would be classified as negligible, minor, moderate, or major. The intensity thresholds
47 are defined as follows:
48

- 49 • No impact: The action does not cause a detectable change.
- 50 • Negligible: The impact is at the lowest level of detection.

- 1 • Minor: The impact is slight but detectable.
- 2 • Moderate: The impact is readily apparent.
- 3 • Major: The impact is severely adverse or exceptionally beneficial.

4 4.1 Cultural Resources

7 4.1.1 Regulatory Environment

8 Section 110 of the National Historic Preservation Act (NHPA) requires Federal agencies to
9 inventory, protect, and maintain historic properties under their jurisdiction, while Section 106
10 requires Federal agencies to take into account the effect of their undertakings on cultural
11 resources and to provide the Advisory Council on Historic Preservation (ACHP) an opportunity
12 to comment on these undertakings.

14 4.1.2 Affected Environment

15 Cultural resources are important because of their association with or linkage to past events,
16 historically important persons, and design and construction values, as well as their ability to
17 yield important information about history. The Gulfport JCC project area, located at 3300 20th
18 Street, Gulfport, Mississippi, was originally constructed in 1954 as a high school for African-
19 American students, known as 33rd Avenue High School. The school closed in 1969, and the
20 school's buildings, known as Buildings 1, 2, and 5, opened as the Gulfport JCC in 1978.
21 Building 1 was used for administration/education, Building 2 was the gymnasium, and Building 5
22 was the cafeteria. The buildings received extensive damage from Hurricane Katrina in 2005
23 and have not been used since.

24
25 In 2011, Buildings 1, 2, and 5 were found to be potentially eligible for listing in the NRHP by the
26 Mississippi Department of Archives and History (MDAH) for Criterion A – “associated with
27 events that have made a significant contribution to the broad patterns of our history” (e.g.,
28 Ethnic Heritage and Education and the Equalization Period); and for Criterion C – “that embody
29 the distinctive characteristics of a type, period, or method of construction, or that represent the
30 work of a master” (e.g., architect Milton B.E. Hill, and International Style).

31
32 The project area associated with the Proposed Action has been included in one previous
33 survey, a Phase I Archaeological Survey by Brockington and Associates, Inc., in February 2012.
34 The Brockington survey found no previously recorded archaeological sites through research and
35 did not recommend any additional sites as potentially eligible after their survey. Brockington did
36 find that there was a school that was built on the site between 1936 and 1939. After receiving
37 permission from the City of Gulfport, Job Corps demolished the elementary school in 2006, after
38 it was damaged by Hurricane Katrina.

39
40 The history of the 33rd Avenue High School begins in the days of “Separate but Equal,” which
41 was a doctrine established by the Supreme Court in the Plessy vs. Ferguson U.S. Supreme
42 Court case of 1896, which established that the Equal Protection clause of the Constitution would
43 not be violated if different races were taught separately from each other, as long as the
44 educational qualities were equal to each other. In support of that doctrine, in 1921 a two-story
45 wood-framed building was constructed on the current site. It served as the school for all ages of
46 African-American students in the City of Gulfport. After a fire destroyed that building, a single-
47 story masonry building was constructed in 1930 to serve as the school. This building later
48 became the elementary school after the current high school buildings, Buildings 1, 2, and 5,
49 were constructed in 1954 (33rd Avenue High School Alumni 2016).

1 Even though “Separate but Equal” was law in the United States, the State of Mississippi did not
2 support each school system equally. White facilities were often large and new, and black
3 facilities were often one-room schoolhouses or sheds in the back of mills. Salaries for black
4 teachers were well below what their white counterparts earned, and the total spent on black
5 students was a fraction of what was spent on white students. For the 1942-43 school year, for
6 example, Mississippi spent \$47.95 per white student, but only \$6.16 on each black student
7 (Bolton 2000).

8
9 With the ruling in *Brown v. Board of Education of Topeka* in 1954, in which the U.S. Supreme
10 Court decided that segregated schools were unequal, the State of Mississippi developed an
11 “Equalization Program,” which they hoped would help in avoiding complete desegregation by
12 making the schools more equal (Bolton 2000). The 33rd Avenue High School resulted from this
13 program and was constructed with funds from the State to achieve the objective of the program.

14
15 Designed by Gulfport architect Milton B.E. Hill in the International Style, the school was meant
16 to reflect the State’s intention of providing new and state-of-the-art facilities to black students
17 that were more equal with white facilities (33rd Avenue High School Alumni 2016). The
18 Equalization Period in Mississippi lasted from 1946 to the early 1960s, and despite the *Brown v.*
19 *Board of Education* decision in 1954, it took Mississippi well over a decade to finally dismantle
20 its segregation programs (Bolton 2000).

21
22 When the schools in Gulfport were finally integrated in 1969, the 33rd Avenue High School was
23 closed. Since that time, there has been a Head Start program in the buildings, followed by the
24 Gulfport JCC, which operated there until Hurricane Katrina in 2005. The buildings have been
25 closed since Hurricane Katrina (Pham-Bui 2011).

26
27 As one of the few remaining schools from this important time frame and in this unique style, the
28 33rd Avenue High School is a tangible piece of history for African-Americans in Gulfport
29 (GazetteSM 2011).

30 31 **4.1.3 Environmental Consequences**

32 For the purposes of this EA, a significant impact under NEPA is defined as an “unresolvable”
33 adverse effect under Section 106 of the NEPA.

34 35 ***Alternative 1: Rehabilitate Existing Buildings***

36 Under Alternative 1, the buildings would be rehabilitated to the Secretary of the Interior’s
37 Standards. The buildings would be returned to their original appearance and would remain in
38 their original configuration. Section 106 consultation with the Mississippi SHPO has been
39 initiated.

40 41 ***Alternative 2: New Construction***

42 Under Alternative 2, Buildings 1, 2, and 5, the existing historic buildings, would be demolished,
43 and new facilities would be built with modern materials and in a different configuration. The
44 Mississippi SHPO has previously indicated that Alternative 2 would result in a major adverse
45 effect on the historic properties. Implementation of Alternative 2 would require extensive
46 additional coordination between the DOL, Mississippi SHPO, and ACHP to negotiate and agree
47 to mitigation procedures, such as Historic American Building Survey [HABS] documentation
48 (which could include either creating architectural drawings or duplicating existing drawings, a
49 detailed history, and large-format photography and is submitted to the National Park Service for
50 inclusion in the Library of Congress’ database) or interpretive signage, and to agree on a

1 timeline for completion. Implementation of these measures would reduce the impacts; however,
2 there would be permanent, major adverse impacts on the historic buildings.

3
4 **Preferred Alternative (Alternative 3): Retain Existing Façades**

5 Under the Preferred Alternative, the street-facing façades of Buildings 1 and 2 would be
6 retained, and the facilities would retain their original appearance. However, the non-street-
7 facing façades and the interiors of buildings would be demolished. Additionally, the Preferred
8 Alternative includes demolition of the cafeteria, with the cafeteria being rebuilt in a different
9 location. The Mississippi SHPO has not yet determined that the Preferred Alternative would
10 result in an adverse effect on the historic properties. Implementation of the Preferred
11 Alternative would require additional coordination between the DOL, Mississippi SHPO, and
12 ACHP to negotiate and agree to mitigation procedures for the non-street-facing façades and the
13 cafeteria (such as HABS documentation) and to agree on a timeline for completion. Because
14 adverse effects on cultural resources would be resolved through mitigation, the Preferred
15 Alternative would not result in significant impacts on cultural resources.

16
17 **Alternative 4: No Action Alternative**

18 Under the No Action Alternative, nothing would be done with the site. The buildings would
19 remain unchanged, but further deterioration of the buildings would occur.

20
21 **4.2 Land Use and Aesthetics**

22
23 This section describes the land use and aesthetics, as well as potential impacts that could result
24 from no action or implementation of the Proposed Action.

25
26 **4.2.1 Affected Environment**

27 The project area is located within the City of Gulfport in Harrison County, approximately 1 mile
28 north of the Gulf of Mexico. The project site is zoned B-2, General Business District. Most of the
29 surrounding areas are zoned R-2 (single family residence district, medium density), with
30 residences within the Naval Construction Battalion Center (NCBC) zoned I-1 (light industry
31 district).

32
33 Consistent with the zoning, land use surrounding the Gulfport JCC is primarily residential. The
34 residences surrounding the JCC are primarily small single-family dwellings, with some empty
35 lots along 21st Street. Residences along 33rd Avenue are relatively new, with most of them
36 constructed since Hurricane Katrina. Four of the six homes on 33rd Avenue are duplexes.
37 Residences within the NCBC are located immediately northwest of the facility.

38
39 The project area includes Buildings 1, 2, and 5, which sustained heavy damage in Hurricane
40 Katrina and have deteriorated since that time; modular buildings brought in for temporary use in
41 order to reopen the Gulfport JCC; a storage building; the two modern dormitory buildings on the
42 northwest portion of the site; mowed grass; and a few trees; The mowed areas are the site of
43 the former elementary school, originally constructed in 1930, that was demolished after
44 Hurricane Katrina.

45
46 The views of the project area from 34th Avenue and 20st Street are of deteriorated Buildings 1
47 and 2. The deteriorated buildings are also viewed from 33rd Avenue with views somewhat
48 softened by open space and a few trees along the edge of the Gulfport JCC property. Several
49 residences, located on 21st Street and within the NCBC, have views of the relatively new
50 dormitories and the landscaped green spaces surrounding them.

1 **4.2.2 Environmental Consequences**

2 ***Alternative 1: Rehabilitate Existing Buildings***

3 The rehabilitation of Buildings 1, 2, and 5 and continued use of Buildings 10 and 11 would have
4 no impact on land use. The new construction (a vocational building and central energy plant)
5 would be on land that is currently open space near where an elementary school was previously
6 located. The building would be similar in outward appearance to Buildings 1 and 2, providing
7 continuity in the look of the overall facility.

8
9 The proposed changes would have minor, permanent impacts on aesthetics, with the primary
10 change being the addition of the new vocational building and central energy plant on a site that
11 is currently developed. The rehabilitation of the deteriorating buildings would improve the
12 viewshed for area residents, as well as the Gulfport JCC's students, faculty, and staff, thereby
13 providing moderate, permanent, beneficial impacts on aesthetics.

14
15 ***Alternative 2: New Construction***

16 Alternative 2 includes the demolition of Buildings 1, 2, 5, and 9; removal of all modular buildings;
17 and construction of five new buildings. While there would be major changes in the look of the
18 campus buildings, the impacts on land use and aesthetics would be similar to Alternative 1.

19
20 ***Preferred Alternative (Alternative 3): Retain Existing Façades***

21 Impacts on land use and aesthetics would be similar to Alternative 1.

22
23 ***Alternative 4: No Action Alternative***

24 Under the No Action Alternative, no impacts on land use would occur because no construction
25 or other changes in land use would take place. The deteriorated buildings, Buildings 1, 2, and
26 5, would continue to deteriorate, providing an unattractive view and permanent, adverse impacts
27 on aesthetics for area residents, as well as students, faculty, and staff at the Gulfport JCC.

28
29 **4.3 Water Resources**

30
31 There are no surface water resources and no wetlands located within the Gulfport JCC. This
32 water resources section focuses on floodplains and coastal zone consistency.

33
34 **4.3.1 Regulatory Setting**

35 **Floodplains.** Land use and development are regulated by the National Flood Insurance Act
36 and Executive Order (EO) 11988, Floodplain Management, which require that Federal agencies
37 take action to reduce the risk of flood loss; minimize the impact of floods on human safety,
38 health, and welfare; and preserve the beneficial values that floodplains serve. It requires
39 Federal agencies to avoid direct or indirect support of development within or affecting the 1
40 percent annual chance Special Flood Hazard Area (SFHA) (i.e., the 100-year floodplain)
41 whenever there is a practicable alternative. Additionally, where the only practicable alternative
42 is to site in a floodplain, a specific step-by-step process must be followed to comply with EO
43 11988, as outlined in the Federal Emergency Management Agency (FEMA) document Further
44 Advice on EO 11988 Floodplain Management. This eight-step process includes the following
45 steps:

- 46
47 1. Determine whether the action would occur in, or stimulate development in, a floodplain.
48 2. Receive public review/input of the Proposed Action.
49 3. Identify and evaluate practicable alternatives to locating in the floodplain.
50 4. Identify the impacts of the Proposed Action (when it occurs in a floodplain).

- 1 5. Minimize threats to life, property, and natural and beneficial floodplain values, and
- 2 restore and preserve natural and beneficial floodplain values.
- 3 6. Reevaluate alternatives in light of any new information that might have become
- 4 available.
- 5 7. Issue findings and a public explanation.
- 6 8. Implement the action.

7
8 **Coastal Zone.** The Coastal Zone Management Act (CZMA) (P.L. 92-583, as amended; 16
9 U.S.C. §§ 1451-1464) encourages the management of coastal zone areas and provides grants
10 to be used in maintaining these areas. It requires that Federal agencies be consistent in
11 enforcing the policies of state coastal zone management programs when conducting or
12 supporting activities that affect a coastal zone. This is intended to ensure that Federal activities
13 are consistent with state programs for the protection and, where possible, enhancement of the
14 Nation's coastal zones.

15
16 The CZMA's definition of a coastal zone includes coastal waters extending to the outer limit of
17 state submerged land title and ownership, adjacent shorelines, and land extending inward to the
18 extent necessary to control shorelines. A coastal zone includes islands, beaches, transitional
19 and intertidal areas, and salt marshes. The Mississippi coastal zone is defined as the three
20 coastal counties of Hancock, Harrison, and Jackson.

21
22 The CZMA requires that coastal states develop a State Coastal Zone Management Plan or
23 program and that any Federal agency conducting or supporting activities affecting the coastal
24 zone conduct or support those activities in a manner consistent with the approved state plan or
25 program. To comply with the CZMA, a Federal agency must identify activities that would affect
26 the coastal zone, including development projects, and must review the State Coastal Zone
27 Management Plan to determine whether a proposed activity would be consistent with the plan.

28 29 **4.3.2 Affected Environment**

30 A portion of the Gulfport JCC is located within a floodplain adjacent to Brickyard Bayou (Zone
31 AE). As shown in Figure 7, the area around the existing dormitories (Buildings 9 and 10) and an
32 area in the northeast portion of the Gulfport JCC property are located within the Brickyard
33 Bayou 100-year flood zone, according to the FEMA Flood Insurance Rate Maps for Harrison
34 County, Mississippi (Map Numbers 28047C0263G and 28047C0376G) (FEMA 2009). An AE
35 flood zone is a non-tidal flood zone for which a base flood elevation has been defined.

36
37 The Gulfport JCC is located within the defined Mississippi Coastal Zone, and as such, funding
38 and construction by the DOL requires a Coastal Consistency Determination under the CZMA of
39 1972.

40 41 **4.3.3 Environmental Consequences**

42 Proposed construction would occur within the 100-year floodplain for Brickyard Bayou.
43 Because the buildings to be constructed on the Gulfport JCC campus are limited in their
44 configuration by historical property rehabilitation considerations, there are no alternative building
45 sites at the current Gulfport JCC location that can be considered to avoid building in the 100-
46 year floodplain. Activities would be coordinated with the Floodplain Administrator for the City of
47 Gulfport and would comply with the FEMA 8-step process.

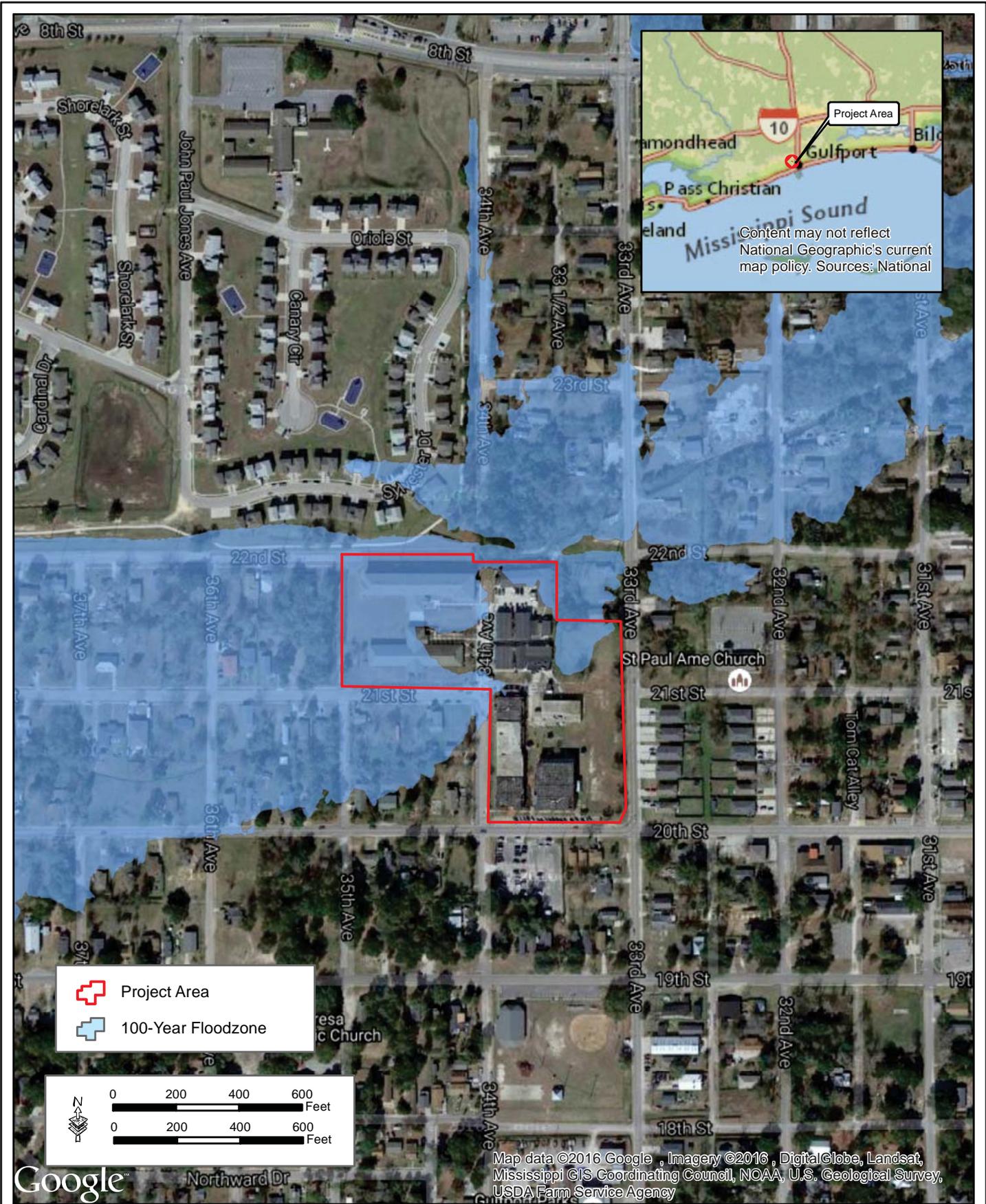


Figure 7. 100-Year Floodzone

1 For construction, fill material would be placed in the floodplain to raise the finished floor
2 elevation to 3 feet above the 100-year base flood elevation. The amount of floodplain area that
3 would be filled for the action alternatives is approximately 5,000 square feet. Foundation walls
4 would be designed to eliminate any rise to the 100-year flood elevation, in accordance with
5 American Society of Civil Engineers (ASCE) 24.
6

7 A Coastal Zone Consistency Determination will be filed with the Mississippi Department of
8 Marine Resources certifying that the proposed construction is in compliance with the Mississippi
9 Coastal Program.
10

11 ***Alternative 1: Rehabilitate Existing Buildings***

12 Under Alternative 1, the storage and maintenance building and energy plant would be located
13 partially within the 100-year floodplain, impacting approximately 5,000 sf within the 100-year
14 floodplain. These structures would be constructed so the finished floor elevations are 3 feet
15 above the 100 year flood elevation. Rehabilitation and construction would occur in a previously
16 disturbed area, and the additional permanent aboveground infrastructure within the floodplain
17 would have a negligible effect on water resources or adjoining floodplain.
18

19 ***Alternative 2: New Construction***

20 Under Alternative 2, the recreation and storage and maintenance buildings would be located
21 partially within the 100-year floodplain, impacting approximately 5,000 sf within the 100-year
22 floodplain. The buildings would be constructed so the finished floor elevation is 3 feet above the
23 100 year flood elevation. Construction would occur in a previously disturbed area, and the
24 additional permanent aboveground infrastructure within the floodplain would have a negligible
25 effect on water resources or adjoining floodplain.
26

27 ***Preferred Alternative (Alternative 3): Retain Existing Façades***

28 Under the Preferred Alternative, the cafeteria and the energy plant/storage and maintenance
29 building would be located partially within the 100-year floodplain, impacting approximately 5,000
30 sf within the 100-year floodplain. The buildings would be constructed so the finished floor
31 elevation is 3 feet above the 100-year flood elevation. Rehabilitation and construction would
32 occur in a previously disturbed area, and the additional permanent aboveground infrastructure
33 within the floodplain would have a negligible effect on water resources or adjoining floodplain.
34

35 ***Alternative 4: No Action Alternative***

36 Under the No Action Alternative, no construction would occur, so there would be no construction
37 within the 100-year floodplain.
38

39 **4.4 Air Quality**

40
41 This section describes the status of air quality in the area of the Gulfport JCC, the standards by
42 which air quality is measured, and the impacts on air quality that would occur with each of the
43 alternatives.
44

45 **4.4.1 Regulatory Setting**

46 The status of the air quality in a given area is determined by concentrations of various pollutants
47 in the atmosphere. The Federal Clean Air Act (42 U.S.C. 7401-7671q) requires the U.S.
48 Environmental Protection Agency (USEPA) to establish a series of National Ambient Air Quality
49 Standards (NAAQS) for air quality pollutant levels throughout the United States. The NAAQS
50 are included in Table 5 (USEPA 2016). The General Conformity Rule (40 CFR 51.850-860 and
51 CFR 93.150-160) requires any Federal agency responsible for an action in a non-attainment or

1 maintenance area for the NAAQS to determine that the action is either exempt from the General
 2 Conformity Rule's requirements and complete a Record of Non-applicability or positively
 3 determine that the action conforms to the provisions and objectives of the State Implementation
 4 Plan (SIP).

5
 6 E.O. 13514, Federal Leadership in Environmental, Energy, and Economic Performance, signed
 7 on 5 October 2009, directs Federal agencies to reduce greenhouse gases (GHGs) and address
 8 climate change in NEPA analyses. It expands upon the energy reduction and environmental
 9 performance requirements of EO 13423, Strengthening Federal Environmental, Energy, and
 10 Transportation Management. EO 13514 identifies numerous energy goals in several areas,
 11 including GHG management, management of sustainable buildings and communities, and fleet
 12 and transportation management. The GHGs covered by this EO include carbon dioxide (CO₂),
 13 methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons (HFCs), and
 14 perfluorocarbons (PFCs). These GHGs have varying heat-trapping abilities and atmospheric
 15 lifetimes (EO 13514). Recent guidance by CEQ also addresses climate change considerations
 16 in NEPA evaluations (CEQ 2014).

17
 18 **Table 5. National Ambient Air Quality Standards**

Pollutant	Standard Value	Standard Type
Carbon Monoxide (CO)		
8-hour average	9ppm *	P
1-hour average	35ppm *	P
Nitrogen Dioxide (NO₂)		
Annual arithmetic mean	0.053ppm *	P and S
Ozone (O₃)		
8-hour average	0.07ppm *	P and S
Lead (Pb)		
Quarterly average	1.5µg/m ³ *	P and S
Particulate<10 micrometers (PM-10)		
24-hour average	150µg/m ³ *	P and S
Particulate<2.5 micrometers (PM-2.5)		
Annual arithmetic mean	12µg/m ³ *	P
Annual arithmetic mean	15µg/m ³ *	S
24-hour average	35µg/m ³ *	P and S
Sulfur Dioxide (SO₂)		
1-hour average	75ppbv *	P
3-hour average	0.50ppm *	S

19 Legend: P= Primary S= Secondary Source: USEPA 2016.
 20 * ppm = parts per million ppb=parts per billion mg/m³ = milligrams per cubic meter of air µg/m³ = micrograms per
 21 cubic meter of air

22
 23 **4.4.2 Affected Environment**

24 The Proposed Action would occur within Harrison County, Mississippi, which is designated as
 25 "in attainment" for all USEPA NAAQS criteria pollutants (USEPA 2016); therefore, it is not
 26 subject to 40 CFR, Part 93 Federal General Conformity Rule regulations.

1 **4.4.3 Environmental Consequences**

2 The environmental consequences for air quality impacts are related to the demolition,
3 rehabilitation, and construction of buildings on the Gulfport JCC campus and air emissions
4 resulting from normal campus operations after construction or rehabilitation has been
5 completed. Air pollutant emissions related to asbestos-containing materials (ACM) and lead-
6 based paint (LBP) hazardous waste generated by demolition or rehabilitation activities are
7 discussed in Section 4.7, Hazardous Materials, and are not discussed in this section.
8

9 **Alternative 1: Rehabilitate Existing Buildings**

10 Rehabilitation of the Buildings 1, 2, and 5 and demolition of Building 9 would generate
11 construction debris and dust as interior and some exterior finishes and components are
12 replaced. Most of the dust generated would be confined to the interior of the buildings, and
13 emissions would be temporary during construction. Excess dust, including any mold remaining
14 in the buildings, would be controlled through best management practices (BMPs), such as dust
15 curtains and watering of debris to minimize health risks for workers and area residents. Internal
16 combustion engines on construction equipment would generate exhaust emissions during
17 operation, but the short duration of construction and limited equipment use would only result in
18 temporary and *de minimis* exhaust emissions. All applicable construction and operation permits
19 required by the Mississippi Department of Environmental Quality (MDEQ) would be obtained
20 prior to any demolition or construction activities. Adherence to controls and BMPs in those
21 permits would ensure that demolition- and construction-related air quality impacts would be
22 temporary and minor.
23

24 There would be no pollutant emissions as a result of normal JCC activities following completion
25 of construction. Therefore, there would be no significant air quality impacts as a result of the
26 implementation of Alternative 1.
27

28 GHGs generated during construction would consist of CO₂-equivalent emissions from internal
29 combustion engines. Given the limited numbers of vehicles and the intermittent duration of
30 vehicle use, the total annual GHGs released would be significantly less than the USEPA-
31 recommended threshold of 25,000 metric tons for which mandatory reporting is required.
32 Therefore, no significant impacts would occur regarding GHG and climate change as a result of
33 implementing Alternative 1.
34

35 **Alternative 2: New Construction**

36 Demolition and disposal of Buildings 1, 2, 5, and 9 on the Gulfport JCC campus would result in
37 the generation of dust and debris. While there would be more dust and debris generated under
38 Alternative 2 than under Alternative 1, BMPs described under Alternative 1 would be in place;
39 therefore, there would be no significant air quality impacts as a result of the implementation of
40 Alternative 2.
41

42 All applicable construction and operation permits required by the MDEQ would be obtained prior
43 to any demolition or construction activities. Adherence to controls and BMPs in those permits
44 would ensure that demolition- and construction-related air quality impacts would be temporary
45 and minor.
46

47 As under Alternative 1, no significant impacts would occur regarding GHG and climate change
48 as a result of implementing Alternative 2.

1 **Preferred Alternative (Alternative 3): Retain Existing Façades**

2 The demolition and disposal of Buildings 1 and 2, except for the street-facing façades, and
3 demolition of Buildings 5 and 9 would result in dust and debris generation similar to Alternative 2.
4 BMPs described under Alternative 1 would be in place; therefore, there would be no significant
5 air quality impacts as a result of the implementation of the Preferred Alternative.
6

7 All applicable construction and operation permits required by the MDEQ would be obtained prior
8 to any demolition or construction activities. Adherence to controls and BMPs in those permits
9 would ensure that demolition- and construction-related air quality impacts would be temporary
10 and minor.

11
12 As under Alternative 1, no significant impacts would occur regarding GHGs and climate change
13 as a result of implementing the Preferred Alternative.
14

15 **Alternative 4: No Action Alternative**

16 Under the No Action Alternative, there would be no demolition or other disturbance of existing
17 buildings on the Gulfport JCC campus; therefore, there would be no dust emissions or
18 equipment emissions, no impacts on air quality, and no impacts on GHGs. However, if a
19 significant wind event caused the roofs of Buildings 1, 2, or 5 to fracture, ACM in the transite
20 panel sub-roofs of the buildings could become airborne and pose a minor health risk to the
21 surrounding community.
22

23 **4.5 Noise**

24
25 **4.5.1 Regulatory Setting**

26 Noise is commonly defined as unwanted or unwelcome sound and is most commonly measured
27 in decibels on the A-weighted scale (dBA) (i.e., the scale most similar to the range of sounds
28 that the human ear can hear). The Day-Night Average Sound Level (DNL) is an average
29 measure of sound. The DNL descriptor is accepted by Federal agencies as a standard for
30 estimating sound impacts and establishing guidelines for compatible land uses. Sound is
31 federally regulated by the Noise Control Act of 1972, which charges the USEPA with preparing
32 guidelines for acceptable ambient noise levels. USEPA guidelines, as well as those of many
33 other Federal agencies, state that outdoor sound levels in excess of 65 dBA DNL are “normally
34 unacceptable” for noise-sensitive land uses including residences, schools, or hospitals (USEPA
35 1974). The Noise Control Act, however, only charges implementation of noise standards to
36 those Federal agencies that operate noise-producing facilities or equipment.
37

38 The Gulfport Code of Ordinances, Section 7-10 - *Noise generally*, outlines noise regulations for
39 the City of Gulfport.
40

41 **4.5.2 Affected Environment**

42 Noise surrounding the Gulfport JCC is generated by residential activities and vehicle traffic. In
43 addition to the JCC, which would continue to operate during demolition and construction,
44 sensitive noise receptors in the vicinity of the JCC include individual private residences.
45

46 **4.5.3 Environmental Consequences**

47 This section describes the potential impacts from noise that could result from the alternatives,
48 including the No Action Alternative.

1 **Alternative 1: Rehabilitate Existing Buildings**

2 Alternative 1 would involve primarily interior demolition and construction for Buildings 1, 2, and 5
3 and demolition of Building 9. It would also include new construction of the vocational trades
4 building and a central energy facility. During demolition and construction activities, there would
5 be intermittent, temporary noise emissions from construction equipment. Equipment used in
6 demolition and construction would generate noise above ambient levels. Estimated noise levels
7 from heavy construction equipment range from 75 to 105 dBA at 50 feet from the source, and as
8 a general rule, the sound intensity decreases 6 dBA with each doubling of the distance from the
9 source (USEPA 1971). Demolition and construction activities would be conducted during
10 daylight hours. Under Alternative 1, all of the demolition and much of the construction would be
11 interior work on Buildings 1, 2, and 5, which would minimize the noise heard in other Gulfport
12 JCC buildings, where administrative functions and classes would continue during construction,
13 and in the surrounding residential areas. There would also be noise associated with the
14 construction of the vocational trades building and the central energy plant. There would be
15 noticeable short-term increases in noise levels, as the noise generated during demolition would
16 be higher than the surrounding ambient sound levels. The proposed demolition and
17 construction would result in temporary, minor adverse noise effects that would impact students,
18 faculty, and staff at the Gulfport JCC and residents living near the facility.

19
20 Noise associated with operation and maintenance of the Gulfport JCC would be similar to the
21 existing conditions, resulting in negligible noise impacts.

22
23 **Alternative 2: New Construction**

24 Under Alternative 2, there would be more use of heavy construction equipment than under
25 Alternative 1, as Buildings 1, 2, 5, and 9 would be totally demolished and five new buildings
26 would be constructed. However, after hazardous materials are removed, the demolition would
27 be accomplished quickly, limiting the amount of time the public would be exposed to the
28 associated noise.

29
30 Other than the additional short-term noise associated with demolition and new construction,
31 noise impacts would be similar to Alternative 1.

32
33 **Preferred Alternative (Alternative 3): Retain Existing Façades**

34 Noise impacts would be similar to Alternative 2.

35
36 **Alternative 4: No Action Alternative**

37 The No Action Alternative would have no significant noise impacts because there would be no
38 construction or other changes at the Gulfport JCC.

39
40 **4.6 Utilities Infrastructure**

41
42 **4.6.1 Affected Environment**

43 Electric utility service within the City of Gulfport is provided by Mississippi Power, a subsidiary of
44 Southern Company. Mississippi Power provides service to 23 counties in southeastern
45 Mississippi. Natural gas is provided by CenterPoint Energy (based in Houston, Texas). The
46 City of Gulfport, Department of Public Works, provides water, sewer, solid waste, stormwater
47 collection, and storm drainage services. Telecommunications services are provided by a
48 number of companies, including AT&T Mississippi, Verizon, and Cable One.

1 **4.6.2 Environmental Consequences**

2 ***Alternative 1: Rehabilitate Existing Buildings***

3 Alternative 1 would allow the student population to increase by 173 (152 of which would be
4 residential students) and the faculty and staff to increase by an estimated 33 persons. With
5 these increases, the student population and faculty would return to the levels for which services
6 were provided prior to Hurricane Katrina.

7
8 The utilities serving the Gulfport JCC have adequate capacity to handle any minor increases in
9 demand for services. The new energy plant would result in lower electric utility use than the
10 facility used prior to Hurricane Katrina when the Gulfport JCC operated at full capacity. Many of
11 the students expected to attend the Gulfport JCC, as well as faculty and staff expected to be
12 associated with the JCC when it returns to full-capacity operations, already live in the region
13 serviced by the utility providers that service the Gulfport JCC, so the net increase in demand for
14 utilities would result in negligible, permanent impacts on utilities.

15
16 ***Alternative 2: New Construction***

17 Impacts associated with Alternative 2 would be similar to Alternative 1.

18
19 ***Preferred Alternative (Alternative 3): Retain Existing Façades***

20 Impacts associated with the Preferred Alternative would be similar to Alternative 1.

21
22 ***Alternative 4: No Action Alternative***

23 The No Action Alternative would have no impacts on utilities, as there would be no construction
24 or other changes that would impact utility use.

25
26 **4.7 Hazardous Materials**

27
28 **4.7.1 Regulatory Setting**

29 The management of hazardous materials is regulated under various Federal and state
30 environmental and transportation laws and regulations, including but not limited to the Resource
31 Conservation and Recovery Act (RCRA); the Comprehensive Environmental Response,
32 Compensation, and Liability Act (CERCLA); the Toxic Substances Control Act (TSCA); the
33 Emergency Planning and Community Right-to-Know provisions of the Superfund Amendments
34 and Reauthorization Act (SARA); and the Hazardous Materials Transportation Act. The
35 purpose of the regulatory requirements set forth under these laws is to ensure the protection of
36 human health and the environment through proper management (identification, use, storage,
37 treatment, transport, and disposal) of these materials. Some of the laws provide for the
38 investigation and cleanup of sites already contaminated by releases of hazardous materials,
39 wastes, or substances.

40
41 The TSCA (codified at 15 U.S.C., Ch. 53), authorizes the USEPA to protect the public from
42 “unreasonable risk of injury to health or the environment” by regulating the introduction,
43 manufacture, importation, sale, use, and disposal of specific new or already existing chemicals.
44 “New Chemicals” are defined as “any chemical substance which is not included in the chemical
45 substance list compiled and published under TSCA § 8(b).” Existing chemicals include any
46 chemical currently listed under § 8(b), including polychlorinated biphenyls (PCBs), asbestos,
47 radon, LBP, chlorofluorocarbons, dioxin, and hexavalent chromium.

48
49 TSCA Subchapter I, “Control of Toxic Substances” (§§ 2601-2629), regulates the disposal of
50 PCB-containing products, sets limits for PCB levels present within the environment, and
51 authorizes the remediation of sites contaminated with PCBs. Subchapter II, “Asbestos Hazard

1 Emergency Response” (§§ 2641-2656), authorizes the USEPA to impose requirements for
2 asbestos abatement in schools and requires accreditation of those who inspect ACM.
3 Subchapter IV, “Lead Exposure Reduction” (§§ 2681-2692), requires the USEPA to identify
4 sources of lead contamination in the environment, to regulate the amounts of lead allowed in
5 products, and to establish state programs that monitor and reduce lead exposure.
6

7 **4.7.2 Affected Environment**

8 Buildings 1, 2, and 5 were found to contain asbestos, LBP, and mold during a survey conducted
9 in 2015 (Southern Earth Sciences 2015). ACM was identified in the main administration
10 building (Building 1), the gymnasium (Building 2), and the cafeteria (Building 5). Friable ACM
11 was identified in pipe insulation in the administration building.
12

13 During a clean-out of the building interiors, all ACM that could reasonably be removed was
14 demolished and transported to a regulated special-waste landfill for disposal. Of the friable
15 ACM, all was removed except approximately 120 linear feet of pipe insulation above the
16 restrooms on the first floor of Building 1. Non-friable ACM remains in floor tiles and mastic in
17 the Building 1 and in roof materials and mastic for all buildings.
18

19 LBP was found on many steel structural members, staircases, and window frames and lintels in
20 all three buildings. The LBP would only be considered a hazardous waste in the event of
21 demolition of the buildings. Mold was found on most of the drywall, plaster, and ceiling tiles in
22 all three buildings, and it was removed with the host materials when the interiors were
23 demolished.
24

25 **4.7.3 Environmental Consequences**

26 ***Alternative 1: Rehabilitate Existing Buildings***

27 Implementation of Alternative 1 would require additional removal of interior and exterior building
28 components and materials during rehabilitation of the three buildings. Materials identified as
29 friable and non-friable ACM would require special handling during removal to prevent escape of
30 airborne ACM. In particular, replacement of the roof materials for all three buildings would
31 involve removal and replacement of ACM in roof materials and mastic. Sanding or cleaning of
32 metal structural members would create the potential for generating airborne LBP dust. BMPs to
33 contain the dust would be implemented. Demolition and handling of ACM and LBP is regulated
34 under permits issued by the USEPA and MDEQ. Adherence to the requirements of those
35 permits would minimize any hazardous waste impacts.
36

37 Construction equipment used for implementation of Alternative 1 would utilize fuel and
38 lubricants; however, the amounts used would be *de minimis* and the potential for spills would be
39 minimal. No hazardous substances would be used during rehabilitation of the three buildings,
40 and no hazardous substances in regulated quantities would be stored or used during operation
41 of the Gulfport JCC after completion. Therefore, there would be negligible impacts due to
42 hazardous substances or wastes associated with the implementation of Alternative 1.
43

44 ***Alternative 2: New Construction***

45 Alternative 2 would involve demolition and removal of Buildings 1, 2, 5, and 9, including ACM
46 and LBP remaining in those buildings. Regulations covering the removal and disposal of ACM
47 and LBP would specify BMPs required to protect the public’s health and prevent uncontrolled
48 generation of hazardous wastes. By following the regulatory requirements of permits issued for
49 demolition and disposal of the buildings, impacts due to generation of hazardous wastes would
50 be minor. All hazardous waste would be properly disposed of by permitted individuals. As with
51 Alternative 1, construction-related BMPs would be in place, no hazardous substances would be

1 used during construction of new buildings, and no hazardous substances in regulated quantities
2 would be stored or used during operation of the Gulfport JCC after completion. Therefore, there
3 would be negligible impacts from hazardous substances or wastes due to implementation of
4 Alternative 2.

5
6 ***Preferred Alternative (Alternative 3): Retain Existing Façades***

7 The Preferred Alternative would involve demolition and removal of the Buildings 1 and 2 and
8 demolition of Buildings 5 and 9, including ACM and LBP remaining in those buildings. As with
9 Alternatives 1 and 2, BMPs would be in place to protect public health and prevent uncontrolled
10 generation of hazardous wastes. By following the regulatory requirements of permits issued for
11 demolition and disposal of the buildings, impacts due to generation of hazardous wastes would
12 be less than significant. As with Alternative 1, construction-related BMPs would be in place, no
13 hazardous substances would be used during construction of new buildings, and no hazardous
14 substances in regulated quantities would be stored or used during operation of the Gulfport JCC
15 after completion. Therefore, there would be negligible impacts from hazardous substances or
16 wastes due to implementation of the Preferred Alternative.

17
18 ***Alternative 4. No Action Alternative***

19 Under the No Action Alternative, if a significant wind event, such as a hurricane, caused the
20 roofs of Buildings 1, 2, or 5 to fracture, then ACM in the transite panel sub-roofs of the buildings
21 could become airborne and pose a minor health risk to the surrounding community. If the
22 buildings are demolished, then precautionary BMPs, as required for control of airborne ACM,
23 would be implemented to contain ACM particles for proper disposal. All demolition debris would
24 require testing for ACM prior to transport and disposal. LBP would not be a health concern
25 unless demolition or collapse occurred, in which case steel members would require testing for
26 LBP to ensure proper disposal.

27
28 **4.8 Health and Safety**

29
30 **4.8.1 Regulatory Setting**

31 Federal, state, and Job Corps guidelines, rules, and regulations are in place to protect students,
32 faculty, and staff at the Gulfport JCC. Health and safety guidelines, rules, and regulations range
33 from Federal Occupational Safety and Health Administration (OSHA) laws and regulations and
34 state and local building codes to design practices focused on creating environments that allow
35 monitoring of students for safety while providing desirable spaces that foster healthy learning
36 environments.

37
38 **4.8.2 Affected Environment**

39 To ensure safety, Buildings 1, 2, and 5 are surrounded by chain-link and iron fencing to prevent
40 entry into the area around the damaged buildings. To promote student health, the JCC has a
41 small wellness center where medical and dental services are provided to students.

42
43 **4.8.3 Environmental Consequences**

44 ***Alternative 1: Rehabilitate Existing Buildings***

45 During construction, all applicable OSHA rules and regulations would be followed by project
46 contractors. Heavy equipment operation areas and interior demolition sites would be secured
47 to prevent inadvertent public access. Alternative 1 would require additional removal of the
48 interior and exterior of Buildings 1, 2, and 5, including some hazardous materials, as discussed
49 previously in Section 4.7.3. Adherence to permit requirements and BMPs would minimize
50 impacts on health and safety. Construction-related impacts would be temporary and negligible.

1 The buildings would be rehabilitated to meet required building health and safety codes;
2 however, the current building layouts would prevent the use of layouts that enhance personal
3 safety and allow natural lighting that is now recognized to foster a healthy learning environment.
4 Rehabilitation of Building 1, with its long hallways, hidden stairwells, and lack of common
5 spaces to break up the functions, would result in a number of locations in the building that would
6 be difficult to supervise adequately, as well as a much less healthy and satisfying learning
7 environment.

8
9 Rehabilitation of the gymnasium (Building 5) would be less than optimal from a health and
10 safety perspective. The existing facility spaces that served as locker rooms in the past (located
11 under the bleachers) are not conducive to the desired Job Corps environment in terms of
12 providing supervision needed to ensure safety and providing spaces that include natural light,
13 which have been found to provide optimum learning environments. Under Alternative 1, during
14 operations there would be permanent, moderate effects on health and safety.

15
16 ***Alternative 2: New Construction***

17 As with Alternative 1, during construction, all applicable OSHA rules and regulations would be
18 followed by project contractors. Heavy equipment operation areas and demolition sites would
19 be secured to prevent inadvertent public access. Construction-related impacts would be
20 temporary and negligible.

21
22 For facility operations, Alternative 2 provides optimal design for health and safety for students,
23 faculty, and staff, with structures and spaces designed to meet the most current design and
24 safety standards. Examples include designs that provide natural light through use of clerestory
25 windows and other architectural features; better design of functional space within the buildings
26 for more harmonious usage by occupants; and quieter HVAC systems. Additional examples
27 include more sound attenuation of noise generated both within and exterior to the building;
28 better Americans with Disabilities Act (ADA)/Architectural Barriers Act Accessibility Standard
29 (ABAAS) compliance, which offers an integrated building for the handicapped; more inviting
30 common space designs; and more functional spaces for functions, such as vocation shops and
31 kitchens, that require equipment in order to function. Alternative 2 also allows the incorporation
32 of designs that provide sight lines that allow visual supervision of students by staff, with spaces
33 designed so that students can be observed without them feeling like they are being watched.
34 Under Alternative 2, there would be negligible impacts on health and safety.

35
36 ***Preferred Alternative (Alternative 3): Retain Existing Façades***

37 As with Alternative 1, during construction, all applicable OSHA rules and regulations would be
38 followed by project contractors. Heavy equipment operation areas and demolition sites would
39 be secured to prevent inadvertent public access. Construction-related impacts would be
40 temporary and negligible. As with Alternative 2, under the Preferred Alternative, there would be
41 negligible impacts on health and safety.

42
43 ***Alternative 4: No Action Alternative***

44 Under the No Action Alternative, access to Buildings 1, 2, and 5 would continue to be restricted;
45 however, as noted previously in Section 4.7.3, the No Action Alternative presents the potential
46 for health impacts due to generation of hazardous waste, debris, and mold, as Buildings 1, 2,
47 and 5 continue to deteriorate. If a significant wind event caused the roofs of Buildings 1, 2, or 5
48 to collapse, then ACM in the transite panel sub-roofs of the buildings could become airborne
49 and pose a minor health risk to the surrounding community. Until the health risks are
50 ameliorated, there could be health risks associated with the No Action Alternative.

1 **4.9 Traffic and Transportation**

2
3 **4.9.1 Affected Environment**

4 The primary east-west transportation artery through Gulfport is Interstate 10 (I-10), which runs
5 east-west across southern Mississippi approximately 4 to 6 miles inland from the Gulf of Mexico.
6 Another east-west artery, U.S. Highway 90, known locally as Beach Boulevard, is located
7 immediately adjacent to the Mississippi coastline. The primary north-south transportation artery
8 in Gulfport is U.S. Highway 49, known locally as 25th Avenue.
9

10 The Gulfport JCC is located on 20th Street between 33rd Avenue and 34th Avenue,
11 approximately 0.5 mile west of U.S. Highway 49, 3.5 miles south of I-10, and 0.9 mile north of
12 U.S. Highway 90. It is a relatively low-traffic, residential area, with curb and gutter streets and
13 sidewalks. Estimated Annual Average Daily Traffic (AADT) data, indicating the number of
14 vehicles per day, are available for two locations on 33rd Avenue in the vicinity of the Gulfport
15 JCC (GRPC 2016). One location is approximately one block north and the other is
16 approximately five blocks south of the Gulfport JCC. The location that is north of the JCC, had
17 an AADT of 8,200 (2011), and the other had an AADT of 2,343 (2013).
18

19 **4.9.2 Environmental Consequences**

20 **Alternative 1: Rehabilitate Existing Buildings**

21 During construction, there would be temporary, minor increases in construction-related traffic as
22 construction workers access the site and construction materials and equipment are delivered.
23

24 Alternative 1 would result in up to an additional 33 faculty and staff commuting to and from the
25 Gulfport JCC each day. Few, if any, of the 60 non-residential students would commute to the
26 Gulfport JCC by car on a daily basis. Commuter students would be expected to arrive in
27 carpools or by bus, adding little vehicle traffic to the local roadways. The additional vehicles
28 would result in permanent, minor increases in traffic on roadways.
29

30 **Alternative 2: New Construction**

31 Impacts associated with Alternative 2 would be similar to Alternative 1.
32

33 **Preferred Alternative (Alternative 3): Retain Existing Façades**

34 Impacts associated with the Preferred Alternative would be similar to Alternative 1.
35

36 **Alternative 4: No Action Alternative**

37 Under the No Action Alternative, no impacts on traffic or transportation would occur because no
38 construction or other changes to the Gulfport JCC would take place.
39

40 **4.10 Socioeconomics**

41
42 This socioeconomics section outlines the basic attributes of population and economic activity
43 within the region of influence (ROI) for the Gulfport JCC and vicinity. Environmental justice and
44 the protection of children are included in this section. The ROI for socioeconomics is Harrison
45 County. Data are also provided for the City of Gulfport and for Census Tract 23, as the JCC is
46 located within Census Tract 23.
47

48 The Gulfport JCC has approximately 70 full-time and part-time employees serving the 107
49 students currently enrolled. Approximately 33 additional employees would be expected when
50 enrollment returns to the target number of 280 students, for an expected total employment of
51 103. Expenditures by both employees and students would be expected to be made in the local

1 economy. Of the 280 students, 220 are expected to live on-campus, and 60 are expected to be
 2 non-residential students.

3
 4 **4.10.1 Regulatory Setting**

5 EO 12898, entitled “Federal Actions to Address Environmental Justice in Minority Populations
 6 and Low-Income Populations,” was signed on 11 February 1994 by President Clinton. The EO
 7 directs Federal agencies to make achieving environmental justice part of their missions by
 8 identifying and addressing, as appropriate, disproportionately high adverse human health,
 9 environmental, economic, and social effects of their programs, policies, and activities on
 10 minority and/or low-income populations. A Presidential Transmittal Memorandum issued with
 11 the EO states that “each Federal agency shall analyze the environmental effects, including
 12 human health, economic and social effects, of Federal actions, including effects on minority
 13 communities and low-income communities, when such analysis is required by the NEPA 42
 14 U.S.C. Section 4321, et seq.”

15
 16 EO 13045 requires each Federal agency “to identify and assess environmental health risks and
 17 safety risks that may disproportionately affect children” and “ensure that its policies, programs,
 18 activities, and standards address disproportionate risks to children that result from
 19 environmental health risks or safety risks.” This EO was prompted by the recognition that
 20 children, still undergoing physiological growth and development, are more sensitive to adverse
 21 environmental health and safety risks than adults.

22
 23 **4.10.2 Affected Environment**

24 ***Population Demographics***

25 Population data from the U.S. Census Bureau show the impact that Hurricane Katrina had on
 26 the population within the ROI (Table 6). Between 2000 and 2010, the population of Harrison
 27 County, the City of Gulfport, and Census Tract 23 declined at an average annual rate of -0.1
 28 percent, -0.5 percent, and -1.4 percent, respectively, compared to an increase of 0.4 percent for
 29 the State of Mississippi and 1.0 percent for the U.S. The population increased in each area
 30 from 2010 to 2014; however, the estimated 2014 population of the City of Gulfport and Census
 31 Tract 23 remained below the population in 2000. From 2000 to 2014, the population of Harrison
 32 County increased at an average annual rate of 0.2 percent. Over the same time period,
 33 Mississippi’s population increased at an average annual rate of 0.4 percent, and the U.S.
 34 population at an average annual rate of 0.8 percent.

35
 36 **Table 6. Population**

Geographical Area	2000	2010	Average Annual Growth Rate 2000 to 2010 (Percent)	2014	Average Annual Growth Rate 2010 to 2014 (Percent)	Average Annual Growth Rate 2000 to 2014 (Percent)
Harrison County	189,601	187,105	-0.1	193,642	0.9	0.2
City of Gulfport	71,127	67,793	-0.5	69,913	0.8	-0.1
Census Tract 23	2,499	2,153	-1.4	2,190	0.4	-0.9
Mississippi	2,844,658	2,967,297	0.4	2,984,345	0.1	0.4
United States	281,421,906	308,745,538	1.0	314,107,084	0.4	0.8

37 Sources: U.S. Census Bureau 2000, 2010, and 2015a

Race and ethnicity data are presented in Table 7. The population of Harrison County is 34 percent minority, and the City of Gulfport is 46 percent minority. The population in Census Tract 23 is 65 percent minority. The minority population in Mississippi, Harrison County, Gulfport, and Census Tract 23 is primarily Black or African American.

Table 7. Race and Ethnicity (Percent)

Geographical Area	White Not Hispanic	Black or African American	Asian	Hispanic	Total Minority
Harrison County	66	25	4	5	34
City of Gulfport	54	38	2	6	46
Census Tract 23	35	64	0	1	65
Mississippi	58	38	1	3	42
United States	63	14	6	17	37

Source: U.S. Census Bureau 2015a

The median household incomes for Harrison County, Gulfport, and Census Tract 23 are well below the U.S. (Table 8). Median household income for Harrison County is estimated to be 79 percent of the U.S. Median household income for Gulfport is even lower at 69 percent of the U.S., and the median household income for Census Tract 23 is very low, at 44 percent of the U.S. median household income.

Table 8. Median Household Income and Poverty

Geographical Area	Median Household Income	Percent of U.S.	All Ages in Poverty 2014 (Percent)	Under Age 18 in Poverty 2014 (Percent)
Harrison County	\$42,285	79	20.0	30.3
City of Gulfport	\$36,658	69	25.5	37.9
Census Tract 23	\$23,621	44	41.2	72.4
Mississippi	\$39,464	74	22.6	32.2
United States	\$53,482	100	15.6	21.9

Source: U.S. Census Bureau 2015b

Poverty data show that the poverty rates in the ROI are high compared to the U.S. The poverty rate in Harrison County (20.0 percent) is above the U.S. poverty rate (15.6 percent) but below the poverty rate for Mississippi of 22.6 percent. Gulfport's poverty rate (25.5 percent) is higher than Mississippi and the U.S., and the poverty rate in Census Tract 23 is extremely high (41.2 percent). The poverty rate for children in Census Tract 23 is 72.4 percent, which is more than twice the child poverty rate for Mississippi and more than three times the child poverty rate for the U.S.

The level of educational attainment by the population age 25 and older is presented in Table 10. In Harrison County, the percentage of the population with a high school credential (86 percent) is the same as the U.S. and somewhat greater than Mississippi (82 percent). The percent of the population in Harrison County with a Bachelor's degree or higher (21 percent) is about the same as Mississippi (20 percent), but noticeably lower than the U.S. (29 percent). The percent of the population in Census Tract 23 with a high school credential (77 percent) and with a Bachelor's degree or higher (15 percent) is noticeably lower than the averages for Mississippi and the U.S.

1

Table 9. Educational Attainment (population 25 years and older)

Geographical Area	High School Credential or Higher (Percent)	Bachelor's Degree or Higher (Percent)
Harrison County	86	21
City of Gulfport	84	20
Census Tract 23	77	15
Mississippi	82	20
United States	86	29

Source: U.S. Census Bureau 2015c

2
3

Labor Force and Employment

The average annual labor force in Harrison County in 2014 was 83,826. The unemployment rate was 7.0 percent, which is below the 7.6 percent annual average unemployment rate for Mississippi (2014) and above the 2014 annual average unemployment rate for the U.S. of 6.2 percent (U.S. Bureau of Labor Statistics [BLS] 2015a and 2015b).

9

Employment by industry data show that employment in Harrison County is concentrated in Retail, Accommodation and Food Services, and Government and Government Enterprises. The percent of employment in Accommodation and Food Services in Harrison County (15.7 percent) is well above the percentages for Mississippi and the nation of 8.0 and 7.3 percent, respectively. Similarly, the percentage of employment in Government and Government Enterprises in Harrison County (23.0 percent) is well above the percentages for Mississippi and the U.S. of 17.7 and 12.9 percent, respectively. Within the Government and Government Enterprises category, military employment accounts for a major portion of the difference, with military employment accounting for 7.2 percent of employment in Harrison County, compared to 1.8 percent for Mississippi and 1.1 percent for the U.S. There is also a lower percentage of the population employed in manufacturing in Harrison County (3.8 percent) than in Mississippi (9.4 percent) and the U.S. (7.0 percent) (Bureau of Economic Analysis [BEA] 2015).

22

Housing

Housing data (Table 10) show that in Census Tract 23, the area around the Gulfport JCC, the median value of the owner-occupied housing units is well below the median value in Harrison County, the City of Gulfport, Mississippi, and the U.S. The median home value in Census Tract 23 is approximately 50 percent lower than the median home value in the U.S. The percentage of housing units that are owner-occupied is also much lower with only 42.4 percent of the occupied units owner-occupied, compared to 51.6 percent for the City of Gulfport and 59.1 percent for Harrison County. Mississippi (68.9 percent) and the U.S. (64.4 percent) have much higher percentages of owner-occupied housing units.

31

1

Table 10. Housing Units

Geographic Area	Total Housing Units	Median Value	Occupied		Homeowner Vacancy Rate*	Rental Vacancy Rate**
			Percent Owner Occupied	Percent Renter Occupied		
Harrison County	87,824	\$139,600	59.1	40.9	3.2	15.6
City of Gulfport	32,878	\$120,600	51.6	48.4	4.5	14.6
Census Tract 23	1,070	\$89,000	42.4	57.6	0.0	6.5
Mississippi	1,284,794	\$100,800	68.9	31.1	2.0	10.6
United States	132,741,033	\$175,700	64.4	35.6	2.1	6.9

2

Source: U.S. Census Bureau 2015d

3

*Homeowner vacancy rate is the proportion of the homeowner inventory that is vacant "for sale."

4

** Rental vacancy rate is the proportion of the rental inventory that is vacant "for rent."

5

6

Community Cohesion

7

Community cohesion is defined as the unifying force of conditions that provide commonality within a group. It has also been used to describe patterns of social networking within a community. Community cohesion refers to the common vision and sense of belonging within a community that is created and sustained by the extensive development of individual relationships that are social, economic, cultural, and historical in nature. The degree to which these relationships are facilitated and made effective is contingent upon the spatial configuration of the community itself; the functionality of the community owes much to the physical landscape within which it is set. The viability of community cohesion is compromised to the extent to which physical features are exposed to interference from outside sources.

16

17

The 33rd Avenue School has historical significance for many students who attended the school, their families, and others in the Gulfport community, as evidenced by an active alumni association, attendance at public meetings held in Gulfport to discuss the future of the school buildings, and television and print news coverage over several years.

21

22

Schools

23

Gulfport JCC is located within the Gulfport School District; The Gulfport School District includes seven elementary schools, two middle schools, one high school, and an alternative school for students assigned because of academic or behavior issues. Enrollment in Gulfport School District schools totaled 6,375 students for the 2015-2016 school year (Mississippi Department of Education 2016). The closest school to the JCC, West Elementary School, is located approximately 1 mile (via city streets) from the JCC. In addition to the Gulfport School District schools, there are several private/parochial schools in Gulfport.

29

30

31

Harrison County School District has 13 elementary schools, two combination elementary and middle schools, three middle schools, three high schools, a career and technical center (high school), and an alternative school. Enrollment in Harrison County Schools totaled 14,628 students for the 2015-2016 school year (Mississippi Department of Education 2016). The Mississippi Gulf Coast Community College, Jefferson Davis Campus, is also located in Gulfport. The Gulfport JCC also provides an important education and training function in the Gulfport community.

37

38

39

Environmental Justice

40

Analysis of demographic data on race and ethnicity and poverty provides information on minority and low-income populations that could be affected by the Proposed Action. Minority

41

1 populations are those persons who identify themselves as Black, Hispanic, Asian American,
 2 American Indian/Alaskan Native, Pacific Islander, or Other. Poverty status is used to define
 3 low-income. Poverty is defined as the number of people with income below poverty level, which
 4 was \$24,230 for a family of four in 2014, according to the U.S. Census Bureau (U.S. Census
 5 Bureau 2015a and 2015b). A potential disproportionate impact may occur when the minority in
 6 the study area exceeds 50 percent or when the percent minority and/or low-income in the study
 7 area are meaningfully greater than those in the region.

8
 9 The population of Census Tract 23 is 65 percent minority, which is greater than 50 percent and
 10 substantially higher minority than the City of Gulfport or Harrison County (Table 11). The
 11 percentage of the population in Census Tract 23 living in poverty is 41.2 percent, which is more
 12 than twice the poverty rate for Harrison County.

13
 14 **Table 11. Minority and Poverty (2014)**

	Minority (Percent)	All Ages in Poverty (Percent)	Under Age 18 in Poverty (Percent)
Harrison County	34	20.0	30.3
City of Gulfport	46	25.5	37.9
Census Tract 23	65	41.2	72.4
Mississippi	42	22.6	32.2
United States	37	15.6	21.9

15 Source: U.S. Census Bureau 2015b

16
 17 **Protection of Children**

18 The potential for impacts on the health and safety of children is greater where projects are
 19 located near residential areas. The Gulfport JCC project is located immediately adjacent to
 20 residential areas. The U.S. Census estimates that, in 2014, persons under 18 years of age
 21 accounted for 25 percent of the population in the City of Gulfport and 25 percent of the
 22 population in Census Tract 23.

23
 24 **4.10.3 Environmental Consequences**

25 From a socioeconomic perspective, this analysis focuses on students who are currently or might
 26 in the future be served by the Gulfport JCC, residents in the City of Gulfport and Harrison
 27 County, the region from which the Gulfport JCC draws students, graduates of 33rd Avenue High
 28 School, and the Mississippi SHPO and the broader historic preservation community.

29
 30 The Gulfport JCC is located within Census Tract 23 (Harrison County), which is a low-income,
 31 high-minority neighborhood, as shown previously in Table 13. To comply with the CEQ
 32 requirement for “early and meaningful public participation,” a public scoping meeting was held
 33 on June 14, 2016, in the Gulfport City Council Chambers, to present the proposed alternatives
 34 to the local community and gather feedback from attendees regarding the proposed
 35 alternatives. A meeting notice was published in the local newspaper (*Biloxi Sun Herald*) and
 36 invitation letters were sent by DOL Job Corps to representatives from MDAH, the City of
 37 Gulfport, the Office of Senator Thad Cochran, the President of the 33rd Avenue High School
 38 Alumni Association, the Quarters Group, and the ACHP. Thirty-four citizens attended (23 local
 39 citizens; 10 city, county, and state officials; and a representative from the ACHP), in addition to
 40 six DOL and Job Corps officials and two contractors preparing this EA. A summary of the
 41 meeting discussion and written comments is included in Appendix B.

1 In addition, a public meeting to present information on the Section 106 review is planned for late
2 2016, in the Gulfport City Council Chambers. Information on the Section 106 meeting,
3 attendance, and results/outcomes will be included in Appendix C in the Final EA.

4
5 **Alternative 1: Rehabilitate Existing Buildings**

6 Alternative 1 would provide permanent beneficial socioeconomic impacts for the City of Gulfport
7 and the region by meeting the desires of residents and former graduates for preservation of an
8 important landmark. Rehabilitation also improves the local viewshed, benefiting the
9 neighborhood around the Gulfport JCC, as well as the broader Gulfport community. Additional
10 beneficial impacts would come from training for students to be new trained workers for
11 companies in the community. Alternative 1 would employ an additional 33 faculty and staff,
12 adding jobs and providing minor, beneficial, direct and indirect socioeconomic benefits in the
13 ROI from additional earnings that would be spent in the ROI and revenues to local businesses.
14 Impacts on housing would be negligible, as any workers moving into the region would be easily
15 absorbed into the existing housing market.

16
17 With BMPs in place during construction, there would be minor, temporary noise, air quality, and
18 traffic impacts on the people living in the immediate vicinity of the Gulfport JCC; however, there
19 would be no long-term or permanent adverse socioeconomic impacts on local residents.

20
21 Rehabilitation of Buildings 1, 2, and 5 would best satisfy the desires of the local community;
22 however, design and engineering studies show that rehabilitation of the existing buildings would
23 yield less functional space than is needed to meet Job Corps standards and would result in a
24 less than optimal space layout for administrative functions, teaching, food service, and
25 recreation. As detailed previously in Section 3.1, for Building 1, design elements and design
26 requirements, including accessibility requirements, prevent functional use of all the available
27 space; result in less than optimal classroom sizes for some training; and cannot provide optimal
28 facilities for processing new students. Rehabilitation of Buildings 2 and 5, the gymnasium and
29 the cafeteria, would not allow the Gulfport JCC to meet current program standards for recreation
30 or for food service, as detailed previously in Section 3.1, thereby providing facilities for students
31 that are less than optimal. In addition, the space available for a new vocational trades building,
32 to provide the job training needed by Gulfport JCC students and companies in the region, would
33 be limited to a facility that has only four shop bays for training, instead of the seven training
34 shop bays that meet Job Corps Program Guidelines and would be provided under Alternative 2.

35
36 Under Alternative 1, there would be no disproportionately high or adverse impacts on minority or
37 low-income populations or the health and safety of children in the community surrounding the
38 Gulfport JCC. However, Alternative 1 does not meet DOL program guidelines for space for
39 administration, education, medical/dental, recreation, or food service, so it does not provide the
40 optimal environment for learning and safety for Gulfport JCC students provided by Job Corps at
41 other Job Corps sites around the country.

42
43 **Alternative 2: New Construction**

44 Alternative 2 would provide facilities that meet all Job Corps design standards. These design
45 standards, which have been developed and refined over many years, are based on historical
46 experience regarding the optimal design for providing a safe and effective learning environment
47 for students.

48
49 Alternative 2 is the optimal way to meet needs of Gulfport JCC students, providing benefits for
50 the students in the form of more options for training, and benefits to the community in the form
51 of well-trained workers. However, Alternative 2 would not preserve the 33rd Avenue High

1 School's historically significant and NRHP-eligible structures, as desired by many residents of
2 areas surrounding the school, 33rd Avenue High School graduates, and historic preservation
3 advocates who desire to see the school rehabilitated.
4

5 As with Alternative 1, Alternative 2 would provide jobs for an additional 33 faculty and staff,
6 providing minor, beneficial, direct and indirect socioeconomic benefits in the ROI from additional
7 earnings that would be spent in the ROI and revenues to local businesses. Impacts on housing
8 would be negligible, as any workers moving into the region would be easily absorbed into the
9 existing housing market. There would be minor, temporary beneficial impacts in the form of
10 construction-related hiring and increased revenues for local firms if local labor is hired and
11 materials are purchased locally.
12

13 Alternative 2 would meet the purpose of and need for the project, benefiting Gulfport JCC
14 students and the community by providing high-quality job training; however, it would result in the
15 demolition of a community landmark, which is unacceptable to some members of the
16 community. Alternative 2 would disproportionately adversely impact minority and low-income
17 populations living near the school and within the community who desire to have the 33rd
18 Avenue High School rehabilitated to serve as an historical landmark and be used by the
19 Gulfport JCC. There would be no disproportionately high or adverse impacts on the health and
20 safety of children with the implementation of Alternative 2.
21

22 ***Preferred Alternative (Alternative 3): Retain Existing Façades***

23 The Preferred Alternative would retain the street-facing façades of Buildings 1 and 2, with new
24 buildings constructed behind the façades to provide the GSF to meet the needs of the Gulfport
25 JCC. This alternative would preserve the look of the buildings from the street.
26

27 As with Alternatives 1 and 2, the Preferred Alternative would provide additional training options
28 for students, well-trained workers for the region, and jobs for an additional 33 faculty and staff,
29 providing minor, beneficial, direct and indirect socioeconomic benefits in the ROI from additional
30 earnings that would be spent in the ROI and revenues to local businesses. Impacts on housing
31 would be negligible, as any workers moving into the region would be easily absorbed into the
32 existing housing market. There would be minor temporary beneficial impacts in the form of
33 construction-related hiring and increased revenues for local firms if local labor is hired and
34 materials are purchased locally.
35

36 Under the Preferred Alternative, the vocational trade education/training building would be 19
37 percent smaller than DOL Program Guidelines recommend. The 19 percent less space
38 (approximately 80 feet in building length) translates to two fewer shop bays for training, reducing
39 the number of shop bays that would be built under Alternative 2 from seven to five.
40

41 While the Preferred Alternative would not provide full rehabilitation of the original 33rd Avenue
42 High School structures, the street-facing facades of the original buildings would be preserved,
43 thereby preserving much of the school's outward appearance. Forty-eight percent of the
44 comment cards received during and after the public meeting indicated that those residents
45 would be supportive of the Preferred Alternative. This response and comments at the public
46 meeting regarding support for a facility that is best for the students indicate that a substantial
47 percentage of the vocal residents would not view the Preferred Alternative as adversely
48 impacting minority and low-income populations. There would be no disproportionately high or
49 adverse impacts on the health and safety of children with the implementation of the Preferred
50 Alternative.

1 **Alternative 4: No Action Alternative**

2 Under the No Action Alternative there would be no construction or other changes to the land.
3 The Gulfport JCC would maintain the campus in its current configuration and functionality. The
4 dormitories and the modular buildings would be retained and used as they are, to the extent
5 feasible for the temporary modular structures, which have already been in use longer than
6 originally intended. The student capacity would remain at 107 students, which is 38 percent of
7 the original and future target capacity of 280 students. The GSF of permanent, functional space
8 needed to meet DOL's suggested program guidelines would not be available. In addition to
9 training fewer students, the lack of space would continue to limit the Gulfport JCC's ability to
10 provide training in several vocational trades that are important in the region. As a result, training
11 for demand occupations would remain unavailable to students, which could impact their ability
12 to obtain a job and their future earning potential.

13
14 The original 33rd Avenue High School buildings, Buildings 1, 2, and 5, would continue to
15 deteriorate due to weather exposure and would continue to be a visual reminder of both the
16 school that was an important part of the lives of many in the community that is no longer
17 functional and the damaging effects of Hurricane Katrina. The No Action Alternative also
18 presents the potential for minor health impacts if a significant wind event causes the roofs of
19 Buildings 1, 2, or 5 to collapse. If damaging winds result in the fracture of the transite panel
20 sub-roof, then ACM could become airborne and pose a minor health risk to the surrounding
21 community. Until the health risks are ameliorated, there is the potential for minor health risks
22 associated with the No Action Alternative.

23
24 Under the No Action Alternative, there would be disproportionate impacts on the low-income,
25 high-minority population living around the school and in the Gulfport community if the buildings
26 are allowed to continue to deteriorate. The NRHP-eligible structures would not be preserved
27 and there would be potential minor adverse health impacts if the structures were allowed to
28 deteriorate to the point that ACM becomes airborne. Training would not be available for the
29 additional students who would be trained at the rehabilitated Gulfport JCC. There could be
30 minor health and safety impacts that would disproportionately impact children if the buildings
31 were allowed to deteriorate to the point of structural instability and ACM is allowed to become
32 airborne.

1 **5.0 CUMULATIVE IMPACTS**
2

3 This section of the EA addresses the potential cumulative impacts associated with the
4 implementation of the alternatives and other projects/programs that are planned for the region.
5 The most severe environmental degradation may not result from the direct effects of any
6 particular action, but from the combination of effects of multiple, independent actions over time.
7 As defined in 40 CFR 1508.7 (CEQ Regulations), a cumulative effect is the impact on the
8 environment which results from the incremental impact of the action when added to other past,
9 present, and reasonably foreseeable future actions regardless of what agency (Federal or non-
10 federal) or person undertakes such other actions.

11
12 The USEPA suggests that analysis of cumulative impacts should focus on specific resources
13 and ecological components that can be affected by the incremental effects of the proposed
14 actions and other actions in the same geographic area. This can be determined by considering
15

- 16 • Whether the resource is especially vulnerable to incremental effects
 - 17 • Whether the Proposed Action is one of several similar actions in the same geographic
 - 18 • area
 - 19 • Whether other activities in the area have similar effects on the resource
 - 20 • Whether these effects have been historically significant for this resource
 - 21 • Whether other analyses in the area have identified cumulative effects
- 22

23 By Memorandum dated June 24, 2005, from the Chairman of the CEQ to the Heads of Federal
24 Agencies, entitled “Guidance on the Consideration of Past Actions in Cumulative Effects
25 Analysis,” CEQ made clear its interpretation that “...generally, agencies can conduct an
26 adequate cumulative effects analysis by focusing on the current aggregate effects of past
27 actions without delving into the historical details of individual past actions...” and that the
28 “...CEQ regulations do not require agencies to catalogue or exhaustively list and analyze all
29 individual past actions.”
30

31 The Gulfport JCC is located in a developed area within the City of Gulfport. It is approximately
32 1 mile north of the Gulf of Mexico and immediately southeast of the NCBC. Rehabilitation of the
33 Gulfport JCC would occur within the current site.
34

35 Harrison County, the City of Gulfport, and the area around the Gulfport JCC experienced
36 substantial redevelopment after the massive devastation throughout the region caused by
37 Hurricane Katrina. Construction in the immediate vicinity of the Gulfport JCC has been entirely
38 residential. In addition to residential construction, the region has experienced and continues to
39 experience extensive rebuilding of infrastructure and governmental and commercial buildings,
40 primarily located in previously developed areas, that are being built to replace infrastructure and
41 structures that were damaged or destroyed by Hurricane Katrina.
42

43 Restoration of the Port of Gulfport began in 2012 after several years of preparation. The \$566
44 million project is expected to be completed in late 2017. The project is being funded with
45 Community Development Block Grant (CDBG) funds through the U.S. Department of Housing
46 and Urban Development (HUD). Since 2012, port construction has provided more than 1,000
47 construction jobs to area residents, and the project is expected to create more than 1,300 new,
48 permanent jobs, with a target of quality jobs for low-to-moderate income residents of a three-
49 county area that includes Harrison County.

1 Other ongoing, recently completed, and reasonably foreseeable projects in the region include
2 the Gulfport Aquarium; Centennial Plaza, a mixed-use development at the site of the former
3 Gulfport Veterans Administration Medical Center; and a Marine Science Center being
4 developed by the University of Southern Mississippi. The area is also experiencing substantial
5 new residential development, including but not limited to development along Highway 90 in
6 response to a tax abatement district established in 2015, as well as construction and
7 rehabilitation of various highways and roads within the ROI.

8 9 **5.1 Analysis of Cumulative Impacts**

10
11 Impacts on each resource were analyzed according to how other actions and projects within the
12 ROI might be affected by the action alternatives and the No Action Alternative. Impacts can
13 vary in degree or magnitude from a slightly noticeable change to a total change in the
14 environment. A summary of the anticipated cumulative impacts on each resource is presented
15 below.

16 17 **Cultural Resources**

18 The current and future actions proposed by other private and governmental entities could have
19 cumulative adverse effects on cultural resources; however, these activities would likely be
20 subjected to review and approval through Section 106 of the NHPA. Consequently, any
21 potential adverse effects on cultural resources are expected to be mitigated or avoided. Under
22 the Preferred Alternative and Alternative 1, there would be no adverse impacts on cultural
23 resources, so when combined with other activities in the region, cumulative impacts on cultural
24 resources within the region would not be significant. However, Alternative 2 and the No Action
25 Alternative would contribute to permanent, major adverse cumulative impacts on cultural
26 resources within the region.

27 28 **Land Use and Aesthetics**

29 There would be no significant adverse land use or aesthetics impacts as a result of the action
30 alternatives. Construction related to any of the action alternatives would be within the existing
31 JCC site. Aesthetic impacts on the surrounding neighborhood would be beneficial, as the
32 buildings that are currently in disrepair would be rehabilitated. When combined with other
33 activities in the region, cumulative impacts on land use and aesthetics impacts within the region
34 would not be significant.

35 36 **Water Resources**

37 There are no surface water resources and no wetlands located within the Gulfport JCC, so there
38 would be no cumulative impacts. Under each of the alternatives, there would be a small section
39 two buildings (a total of approximately 5,000 sf) located within the floodplain; however, there
40 would be no significant impacts on water resources associated with the action alternatives.
41 When combined with other activities in the region, cumulative impacts on water resources within
42 the region would not be significant.

43 44 **Air Quality**

45 Air quality impacts generated by the action alternatives occur during construction, and they
46 would be mitigated through BMPs. Impacts would be temporary and minor. When combined
47 with other activities in the region, cumulative impacts on air quality within the region from the
48 action alternatives would be negligible. However, under the No Action Alternative, if a
49 significant wind event caused the roofs of Buildings 1, 2, and 5 to fracture, then ACM in the
50 transite panel sub-roofs of the buildings could become airborne and, when added to other air
51 quality issues, have a cumulative impact within the region.

1 **Noise**

2 All noise generated by the action alternatives would be temporary, limited to the duration of
3 construction. There would be no permanent change to the noise environment in the region.
4 Noise associated with the Gulfport JCC would not contribute to cumulative effects on ambient
5 noise levels in the region.
6

7 **Utilities**

8 The new energy plant that would be constructed under each of the action alternatives would
9 result in lower electric utility use than the facility used prior to Hurricane Katrina when the
10 Gulfport JCC operated at full-capacity and may not be significantly different from current usage.
11 Many of the students expected to attend the Gulfport JCC, as well as faculty and staff expected
12 to be associated with the JCC when it returns to full capacity operations, already live in the
13 region serviced by the utility providers that service the Gulfport JCC. The net increase in
14 demand for utilities would result in negligible effects within the region, and when combined with
15 other activities in the region, there would be no significant cumulative impacts.
16

17 **Hazardous Materials**

18 By following the regulatory requirements of permits issued for demolition and disposal and
19 adhering to BMPs in the handling of hazardous materials generated during construction of the
20 action alternatives, impacts from hazardous wastes would be minor. No hazardous substances
21 would be used during rehabilitation of the three buildings, and no hazardous substances in
22 regulated quantities would be stored or used during operation of the Gulfport JCC after
23 completion. Hazardous materials associated with the action alternatives would not contribute to
24 cumulative effects within the region. However, the No Action Alternative presents the potential
25 for minor health impacts if a significant wind event, such as a hurricane, caused the roofs of
26 Buildings 1, 2, or 5 to fracture. In that event, ACM in the transite panel sub-roofs of the
27 buildings could become airborne and pose a minor health risk to the surrounding community.
28

29 Under the No Action Alternative, if a significant wind event, such as a hurricane, caused the
30 roofs of Buildings 1, 2, or 5 to fracture, then ACM on the roofs of the buildings could become
31 airborne and pose a minor health risk to the surrounding community.
32

33 **Health and Safety**

34 Health and safety impacts from the action alternatives would be related to the health and safety
35 of students, faculty, staff, and construction personnel at the site. There would be no cumulative
36 impacts on the community or the region from the action alternatives. However, the No Action
37 Alternative presents the potential for minor health impacts if a significant wind event, such as a
38 hurricane, caused the roofs of Buildings 1, 2, or 5 to fracture. In that event, ACM in the transite
39 panel sub-roofs of the buildings could become airborne and pose a minor health risk to the
40 surrounding community.
41

42 Under the No Action Alternative, if a significant wind event, such as a hurricane, caused the
43 roofs of Buildings 1, 2, or 5 to fracture, then ACM on the roofs of the buildings could become
44 airborne and pose a minor health risk to the surrounding community.
45

46 **Traffic and Transportation**

47 Implementation of the action alternatives would result in minor increases in traffic in the
48 immediate vicinity of the Gulfport JCC. The 33 additional employees expected to be hired at the
49 Gulfport JCC likely already live and work within the region, and minimal traffic associated with
50 students is expected. When combined with other activities in the region, cumulative impacts on
51 traffic associated with the action alternatives would be minor.

1 **Socioeconomics**

2 Under the three action alternatives, rehabilitation of the Gulfport JCC would involve varying
3 levels of demolition and construction. Construction workers would be hired to accomplish the
4 required tasks. The Gulfport JCC project would increase demand for construction workers in
5 the ROI, and depending on the timing of the Gulfport JCC Proposed Action and other ongoing
6 and planned projects, would have a minor to moderate cumulative impact on construction
7 companies and workers within the ROI. Depending on other conditions in the region, the
8 increased demand for construction workers could 1) provide employment for currently
9 unemployed or underemployed construction workers, 2) force companies to look outside the
10 ROI for construction workers; or (less likely) 3) drive up costs if the companies are forced to pay
11 higher wages to get construction workers to work for them in response to a worker shortage. In
12 any event, the additional investment into the region, in the form of wages, the local leasing of
13 equipment or purchase of construction materials, or hiring of local subcontractors, would be
14 expected to bring direct investment into the region from outside the region that would have
15 cumulative positive ripple effects in the economy.

16
17 In addition to the increased monetary investments in the region, rehabilitation of the Gulfport
18 JCC under Alternatives 1 and 3, where at least the façades of buildings 1 and 2 would be
19 preserved, would, in conjunction with other projects to rehabilitate historically significant
20 properties such as the redevelopment of the Gulfport Veterans Administration medical center
21 (the Centennial Plaza mixed-use development project), provide cumulative positive benefits to
22 citizens seeking to preserve key symbols of the region's history, much of which was destroyed
23 during Hurricane Katrina. In contrast, Alternative 2, which would include total demolition of
24 Buildings 1,2, and 5, and the No Action Alternative would have moderate adverse cumulative
25 impacts on the ROI, which lost many symbols of its past as a result of Hurricane Katrina.

26
27 Rehabilitation of the Gulfport JCC would provide training in trades that are in demand in the
28 region. As a result of lack of space and training facilities, the Gulfport JCC is now limited to
29 providing training for 107 students. The only hard vocational trade training currently available at
30 the Gulfport JCC is electrical. The rehabilitated Gulfport JCC would allow training of an
31 additional 173 students and provide hard vocational training in several additional demand
32 occupations, including construction trades. The additional trained students would provide
33 workers for companies in the region, and cumulative benefits in the form of trained workers for
34 area companies.

1 **6.0 CONDITIONS AND MITIGATION MEASURES**
2

3 The Preferred Alternative (Alternative 3) was analyzed based on the studies, consultations, and
4 reviews undertaken as reported in this EA. During project construction, short-term impacts on
5 air quality, noise, and hazardous materials are anticipated, and conditions have been
6 incorporated to mitigate and minimize these effects. Short-term adverse impacts would be
7 mitigated using BMPs, such as watering of debris to minimize dust, proper vehicle and
8 equipment maintenance, and appropriate signage.
9

10 Based upon the studies, reviews, and consultations undertaken in this EA, the following
11 conditions must be met and mitigation measures taken by DOL prior to and during project
12 implementation:
13

- 14 • DOL must follow all applicable local, state, and Federal laws, regulations, and
15 requirements and obtain and comply with all required permits and approvals prior to
16 initiating work.
- 17 • If during the course of work, archaeological artifacts (prehistoric or historic) are
18 discovered, DOL will stop work in the vicinity of the discovery and take all reasonable
19 measures to avoid or minimize harm to the finds. DOL shall inform MDAH and will not
20 proceed with work until consultation with the SHPO and others, as appropriate.
- 21 • Project construction would involve the use of potentially hazardous materials (e.g.,
22 petroleum products, including but not limited to gasoline, diesel, brake and hydraulic
23 fluid, cement, caustics, acids, and solvents) and could result in the generation of small
24 volumes of hazardous wastes. In addition, ACM and LBP must be removed from the
25 Buildings 1 and 2 prior to demolition.
26

27 DOL will take appropriate measures to prevent, minimize, and control spills of hazardous
28 materials. Regulations covering the removal and disposal of ACM and LBP specify the BMPs
29 that would be followed to protect public health and prevent uncontrolled generation of
30 hazardous wastes. Generated hazardous or non-hazardous wastes would be disposed in
31 accordance with applicable Federal, state, and local regulations.
32

- 33 • DOL will comply with all local, state, and Federal requirements related to disposal of
34 solid waste, control and containment of spills, and discharge of surface runoff and/or
35 stormwater from the site.
- 36 • Applicable OSHA rules and regulations will be followed by project contractors. Heavy
37 equipment operation areas and demolition sites will be secured to prevent inadvertent
38 public access.
- 39 • Unusable equipment, debris, and material will be disposed of in an approved manner
40 and location. All coordination pertaining to these activities will be documented. All
41 waste is to be transported by an entity maintaining a current "waste hauler permit"
42 specifically for the waste being transported, as required by applicable regulations.
- 43 • A Coastal Consistency Determination under the CZMA of 1972 will be required.
- 44 • A portion of the cafeteria (primarily the loading dock) and a portion of the storage facility
45 would be located within the 100-year floodplain. These structures would be constructed
46 so the finished floor elevations are 3 feet above the 100-year flood elevation. DOL
47 would comply with the FEMA 8-step process.

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1 **8.0 LIST OF PREPARERS**

2

The following people were primarily responsible for preparing this Environmental Assessment.

Name	Agency/ Organization	Discipline/ Expertise	Experience	Role in Preparing EA
Ann Guissing	GSRC	Economics	35 years; NEPA studies, economic analysis, economic development	Project Manager; EA preparation, socioeconomics, environmental justice, traffic, land use and aesthetics, utilities
Steve Oivanki	GSRC	Geology	30 years; HAZMAT/ geological studies	Hazardous materials, air quality, water resources, alternatives descriptions
Sharon Newman	GSRC	GIS/ Graphics	19 years; GIS analysis	GIS and graphics
Carey Perry	GSRC	Ecology/Wetlands	11 years; NEPA studies, natural resources	Report review
Josh McEnany	GSRC	Wildlife Biology	15 years; NEPA studies, natural resources	Report review
Chris Ingram	GSRC	Biology/Ecology	37 years; EA/EIS studies	Quality Assurance/ Quality Control

3

APPENDIX A
AGENCY COORESPONDENCE AND PUBLIC MEETING NOTICE



MAY 17 2016

Re: Notice of Public Scoping Meeting Environmental Assessment for the Restoration or Replacement of Buildings at the Gulfport Job Corps Center, Gulfport, Mississippi

Dear Consulting Party:

The U.S. Department of Labor (DOL) has planned a public scoping meeting regarding the redevelopment of the Gulfport Job Corps Center (Gulfport JCC). The meeting will examine the work needed to restore the Gulfport JCC buildings, which were severely damaged by Hurricane Katrina.

In accordance with the National Environmental Policy Act (NEPA), DOL will prepare an Environmental Assessment (EA) to analyze the impacts of the restoration and/or replacement options under consideration. As part of the NEPA process, DOL is conducting a scoping meeting to solicit input from the public regarding the proposed alternatives.

Alternatives being considered include restoring existing buildings (which were designed to accommodate 280 students), constructing new buildings, retaining the existing facades with new construction behind the facades, and the No Action Alternative. The No Action Alternative entails the continued use of modular buildings (intended for temporary use), and would restrict the number of students who could be served from 280 to the 107 now being served.

The public scoping meeting will be held June 14, 2016, from 6 p.m. until 8 p.m. The meeting will be at the Council Chambers of City Hall, 2309 15th Street, 2nd Floor, Gulfport, MS 39501. Subject matter experts will be on-site to answer questions, and offer a brief presentation. Questions regarding the meeting or the EA can be e-mailed to fitzhugh.marsha@dol.gov; subject line: "Gulfport Job Corps Center EA." Comments or input regarding the alternatives or potential impacts on sensitive resources can be submitted at the meeting, or later via U.S. Postal Service to the following address: Gulf South Research Corporation, 8081 Innovation Park Dr., Baton Rouge, LA 70820. Information is due by July 14, 2016. Comments received will be addressed in the draft EA, which will be released for public review and comment for a period of 30 days.

Your participation is greatly appreciated and we look forward to seeing you at the date, time, and location noted above. If you have any questions or need additional information, please contact Marsha Fitzhugh at fitzhugh.marsha@dol.gov.

Sincerely,



Lenita Jacobs-Simmons
National Director
Office of Job Corps

cc: Charlene Dwin Vaughn, AICP
Assistant Director
Office of Federal Agency Programs
401 F Street, NW, Suite 308
Washington, DC 20004

Jim Woodrick, Director of Historic Preservation Division
Mississippi Department of Archives and History
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Kenneth H. P'Pool, Deputy State Historic Preservation Office
Mississippi Department of Archives and History
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1780 Gulfport, MS 39502

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Gulfport, Mississippi 39501
Lindsay Linhares: Lindsay_Linhares@cochran.senate.gov

Jimmy Woullard, President of 33rd High School Alumni Association
4168 Goldfinch Drive
Gulfport, MS 39501

Gayle Tart, Esquire
Appearing on Behalf of 33rd Alumni Association and the Quarters Group
Post Office Box 638
Long Beach, MS 39560

Proof of Publication

STATE OF MISSISSIPPI

COUNTY OF HARRISON

Notice of Public Scoping Meeting
 Environmental Assessment for the Restoration or Replacement of Buildings at the Gulfport Job Corps Center
 Gulfport, Mississippi
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 In accordance with the National Environmental Policy Act (NEPA), DOL will prepare an Environmental Assessment (EA) to analyze the impacts of the restoration and/or replacement options under consideration. As part of the NEPA process, DOL is conducting a scoping meeting to solicit input from the public regarding the proposed alternatives.
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 Your participation is greatly appreciated and we look forward to seeing you at the date, time, and location noted above. If you have any questions or need additional information, please contact Marsha Fitzhugh at fitzhugh.marsha@dol.gov.
 ADV29,1SUN 1576151

Before me, the undersigned Notary of Harrison County, Mississippi personally appeared Cruta Brackett who, being by me first duly sworn, did depose and say that she is a clerk of The Sun Herald, a newspaper published in the city of Gulfport, in Harrison County, Mississippi, and the publication of the notice, a copy of which is hereto attached, has been made in said paper 1 times in the following numbers and on the following dates of such paper, viz:

- Vol. 132 No., 239 dated 29 day of May, 2016
- Vol. _____ No., _____ dated _____ day of _____, 20_____
- Vol. _____ No., _____ dated _____ day of _____, 20_____
- Vol. _____ No., _____ dated _____ day of _____, 20_____
- Vol. _____ No., _____ dated _____ day of _____, 20_____
- Vol. _____ No., _____ dated _____ day of _____, 20_____
- Vol. _____ No., _____ dated _____ day of _____, 20_____

Affiant further states on oath that said newspaper has been established and published continuously in said county for a period of more than twelve months next prior to the first publication of said notice.

JUN 02 2016

Cruta Brackett

Clerk

PAID

Sworn to and subscribed before me this 1 day of

June, A.D., 2016

Katesha Price

Notary Public

*The Sun Herald has been deemed eligible for publishing legal notices in Jackson County to meet the requirements of Miss. Code 1972 Section 13-3-31 and 13-3-32



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**APPENDIX B
PUBLIC SCOPING MEETING**

**Public Scoping Meeting
Gulfport Job Corps Center Environmental Assessment
Gulfport City Council Chambers
Gulfport, Mississippi
June 14, 2016
6 p.m. – 8 p.m.**

Staff/Contractor Attendees:

Lenita Jacobs-Simmons – National Director, Job Corps
Marsha Fitzhugh – Job Corps
Bill Dakshaw – Job Corps
John Boyer – Engineering Support Contractor (ESC) for Job Corps
Chris Garrett – ESC for Job Corps
Eric Siddle – ESC for Job Corps
Ann Guissing – Gulf South Research Corporation (GSRC)
Steve Oivanki - GSRC

Gulfport Chief Administrative Officer – Dr. John R. Kelly

Public Attendees:

34 attendees; list of attendees included as Attachment A

Meeting Summary:

Attendees were asked to register as they arrived. They were provided a comment sheet for providing comments. The comment sheet provided mail and email addresses for sending comments at a later date. Posters showing the information to be presented at the meeting were placed around the room for attendees to view.

The public meeting began with brief presentations by Dr. John Kelly, Marsha Fitzhugh, and Lenita Jacobs-Simmons. Ann Guissing and Chris Garrett presented information on the efforts now underway (the Environmental Assessment, Section 106 consultation, and the feasibility study), the National Environmental Policy Act (NEPA) and the NEPA process, project goals, and the alternatives under consideration. Upon completion of the presentation, Ann Guissing facilitated a discussion of the alternatives, which include 1) Rehabilitate¹ Existing Buildings, 2) New Construction, 3) Retain Existing Façades, and 4) No Action Alternative. The No Action Alternative is required by NEPA and is not considered a viable alternative. The following are notes on the comments and topics addressed in the discussion.

Ken P'Pool, Deputy State Historic Preservation Officer (SHPO) with the Mississippi Department of Archives and History (MDAH), stated that unless a museum is planned, historic buildings are rehabilitated rather than restored in order to keep them on the tax rolls for the municipality that owns them and to keep them in the economy. This means that the outside appearance is usually restored, but interior components are upgraded to current building and safety standards for continued use for another purpose. This would be the case for the 33rd Avenue School buildings at the Gulfport Job Corps Center (JCC). The MDAH rehabilitation standards would be

¹ Changed from "Restore" to "Rehabilitate" in response to comments received at the Public Scoping Meeting.

met to the extent possible. In addition, state law requires historic buildings held by public agencies to be maintained for their historic value. The previous efforts after Hurricane Katrina did not follow state or Federal procedures, but the current effort will follow those procedures.

An audience member asked a question about the level of restoration anticipated. Job Corps/ESC for Job Corps staff responded that the U.S. Department of Labor (DOL) is seeking a functional, modern facility that incorporates features of the original structures. A discussion followed about using the words “rehabilitate” and “rehabilitation” instead of the words “restore” and “restoration,” with an apparent consensus regarding the need to change the terminology to be used in the EA.

An audience member stated that she wants a building that will “take students into the future.” She wants what is best for the future for the Gulfport JCC students, not necessarily what’s best for preserving the history of the buildings. If it comes down to a choice, she would defer to the benefit for future children and their education. The current safety standards must be met in any rebuilding effort.

Gulfport Councilwoman Ella Holmes-Hines said that rehabilitation of the Gulfport JCC must meet current city building standards and codes. She would like to see the historic character of the buildings retained, but not at the cost of safety. Job Corps staff noted that all new construction would meet current safety codes for the City of Gulfport. It would be a modern building inside.

An audience member wants the history told, but stated that the focus should be on what is best for the students.

An audience member stated that she was not opposed to interior changes, but the outside façades must be restored, and the buildings must not be torn down.

An audience member blamed the city for letting the buildings deteriorate after Hurricane Katrina. The buildings must be preserved for their historical value. She is a graduate of the high school, and many other graduates have become prominent members of the city and society and have achieved many honors. She stated that the building previously torn down was more historic than the buildings that remain. The school must be restored.

An audience member stated that all ideas for renovation and restoration of the Gulfport JCC are important. The 33rd Avenue School was the last black segregated school to close in the U.S. She also discussed past grievances related to segregation and disregard for the African-American community in Gulfport. She questioned the lack of insurance and blamed the JCC and Gulfport for the loss of the buildings after the storm.

An elected official, Mr. Richard Marsh, stated that the school’s history is important, and he wants local African-American architects and engineers to do the rehabilitation work on the buildings. He personally favors Alternative 3, keeping the façades and building new structures behind them.

Councilwoman Ella Holmes-Hines spoke about the rivalry between the 33rd Avenue High School and North Gulfport High School. She stated that the rivalry still remains in the community today. She favors either Alternative 1 (Rehabilitate Existing Buildings) or Alternative 3 (Retain Existing Façades).

Another audience member asked where the money for the project would come from. Why were the buildings not insured by the city or the Federal government? Where did the Federal money after the storm go? It was explained that the storm money went into the portable buildings to get the JCC up and running after the storm. The portable buildings, however, have exceeded their useful life. The Federal government is self-insured, and any money for rehabilitation would have to be appropriated by Congress. The JCC budget expires at the end of June each year. The Gulfport JCC is in each annual budget, but without concrete plans and appropriate documentation, no money can be spent on rehabilitating the buildings.

Several discussions followed regarding frustration with the lack of insurance and the lack of responsibility for protecting the buildings with tarps or other measures after the storm. Another audience member stated the need to stop talking about the past and move ahead with something to rehabilitate the buildings. Another audience member wanted to know why there was no stenographer for the meeting to accurately record all comments. It was explained that this was a scoping meeting to gather input on the alternatives and concerns the public has about the impacts associated with the alternatives. It was also stated that the comments and concerns expressed in the meeting and in writing over the next 30 days will be incorporated into the EA, that the public will have opportunities to comment on the draft EA after it is completed, and that there will be additional public meetings about this project in the future.

Comment Form Summary:

Comment forms were submitted by 20 meeting attendees. Many of them requested that the words “rehabilitate” and “rehabilitation” be used throughout the EA in place of the words “restore” and “restoration. All of the attendees submitting comment forms included a request regarding the alternative(s) they would like to see carried forward.

Alternative	Number of Attendees Selecting
Alternative 1	8
Alternative 2*	3
Alternative 3	2
Alternative 1 or 3	9

*One Comment Form was not signed; two comment forms were submitted by mail

Attachment A
Gulfport Job Corps Center
Public Scoping Meeting Attendees – June 14, 2016

Name	Category	City	Email Address
Gary Anderson	City of Gulfport	Gulfport	ganderson@gulfport-ms.com
Sam Edward Arnold	Private Citizen	Gulfport	samedwardarnold@gmail.com
Mel Arsenault	Mississippi State Port Authority	Gulfport	Marsenalt@shipmspa.com
Kenneth Casey Sr.	Gulfport City Council	Gulfport	kcasey@gulfport-ms.gov
Glenn Cobb	Private Citizen	Gulfport	
Glenda F. Collins	Private Citizen	Gulfport	grannyglecol@live.com
Eric R. Cooper	Private Citizen	Gulfport	coopere66@yahoo.com
Shirley Cooper	Private Citizen	Gulfport	
Lisa A. Floyd Etienne	Private Citizen	Saucier	etienne1527@aol.com
Chris Fisher	Private Citizen	Gulfport	
Jessie Fitzgerald	Elected Official	Gulfport	
Jerry Freightman	Private Citizen	Gulfport	
Lillie H. Graves	Gulfport Job Corps Center Staff	Gulfport	graves.lillie@jobcorps.org
Councilwoman Ella Holmes-Hines	Elected Official	Gulfport	ehines@gulfport-ms.gov
Brilla Hudson	Private Citizen	Gulfport	zphibleo@aol.com
Annie James	Private Citizen	Gulfport	
Kent Jones	Harrison County Board of Supervisors	NA	
Geraldine Jones	Private Citizen	Gulfport	
Prince Jones	Private Citizen	Gulfport	wmprincejones@yahoo.com
Gwendolyn Jones	Private Citizen	Gulfport	lawjones47@yahoo.com
Lelia Lang	33 rd Avenue Alumni Association	Gulfport	
Richard K. Marsh	Elected Official	NA	
Dorothy McClendon	Private Citizen	Gulfport	
Ken P'Pool	MDAH	Jackson	kppool@mdah.ms.gov
Dorothy Robert	Private Citizen	Gulfport	
Johnny Sanders	Birthday Mardi Gras Club	Gulfport	trojan68@bellsouth.net
Gayle Tart	Private Citizen	Long Beach	gayletartbaker@gmail.com
Ruthie Thaggart-White	33 rd Avenue School Alumni	Gulfport	Thagwhite@icloud.com
Charlene D. Vaughn	Advisory Council on Historic Preservation	Washington, D.C.	cvaughn@achp.gov
Sharron Wells	Gulfport Job Corps Center Staff	D'Iberville	wells.sharron@jobcorps.org
Ruthie White	NA	NA	
Nakisha R. Williams	Private Citizen	Gulfport	nakishaws@aol.com
Jimmie Woollard	NA	Gulfport	
Sandra Wyche	NA	Gulfport	wychesandra@gmail.com

NA – Not available

APPENDIX C
SECTION 106 PUBLIC MEETING NOTES
