Mr. Kenneth H. P'Pool  
Deputy State Historic Preservation Officer  
Mississippi Department of Archives and History  
P. O. Box 571  
Jackson, MS 39205-0571

RE: Reinitiation of Proposed Gulfport Job Corps Center Section 106 process – Mississippi Department of Archives and History (MDAH) Project Log #03-003-16, Harrison County

Dear Mr. P'Pool:

The Department of Labor (DOL) and Job Corps formally reinitiated consultation with your office in March 2016, under Section 106 of the National Historic Preservation Act (NHPA), for the Gulfport Job Corps Center (JCC), which was originally known as the 33rd Avenue High School. DOL would now like to continue the consultation process by providing your office with the documentation required in 36 CFR 800.6(a)(3) and 800.11(e).

Background

Job Corps is a national training and employment program administered by the DOL. Job Corps addresses multiple barriers to employment faced by disadvantaged youth throughout the United States. Job Corps’ mission for eligible young adults is to teach them the skills they need to become employable, prepare them for careers, and further their education.

There is substantial demand for Job Corps services in the Gulfport region. Since 2015, the Gulfport JCC and the other centers in the State of Mississippi have provided services to 1,501 of the approximately 12,000 eligible students who applied for services. While some of these eligible applicants were placed in centers in surrounding states, there is substantial unmet demand for Job Corps services in Mississippi.

The Gulfport JCC is one of the highest ranking JCCs in the nation. The Job Corps’ Outcome Measurement System (OMS) is a measure of center performance that is based on 1) placement in employment or higher education, 2) attainment of a degree or certificate, 3) literacy and numeracy gains, and 4) efficiency/cost per participant. The most recent OMS ranking for Gulfport (through February 2016) is a rank of 6 out of 126 centers across the county, an indication of the quality training the Gulfport JCC provides.

DOL proposes to redevelop the Gulfport JCC so that it can provide training at the 280-student capacity level for which it was originally designed. This Gulfport JCC redevelopment project
In a letter dated March 14, 2016, MDAH commented with the DOT that Buildings 1, 2, and 5 were potentially eligible for listing in the NRHP. The Culturon ICC was included in Phase I Archaeological Survey by Recophon and Associates, Inc., which was completed in February 2016. The survey found no previously recorded archeological sites and did not recommend any additional sites for inclusion in the NRHP.

The Culturon ICC was closed in August of 2015 and the site was acquired by the Mississippi Department of Archives and History. In 2017, Buildings 1, 2, and 5 were found to be potentially eligible for listing in the National Register of Historic Places (NRHP).

The ICC was closed due to budget cuts and student enrollment. In 2009, the ICC was reopened, and the modular buildings were brought on line. Since then, the ICC has continued to operate as a community college, offering courses in a variety of subjects, including vocational training programs.
5. would remain the conference, education building. Building 2, the administration, would be the primary administration and building. The historical nature of these buildings, Building 2, and 5 would undergo major renovation. But would remain their current outward facade as much as possible, in keeping with
interior student facilities (Proctor Flats-2). Buildings 1, 2, and 5 would undergo major structural integrity of all systems on the site.

Under Alternative 1, the DOT would rehabilitate the existing historic structures, with new

Alternative 1: Rehabilitation

described below and are summarized in Tables 1 and 2.

These alternatives are

Alternative 1 would be expected to take approximately 65 months, with 18 months for each

Alternative 1 would provide approximately 32,500 sf of usable space. Design and construction for

Guideline for Core Use of Corps facilities for 29,800 square feet (sf) for 280 students, and this

is a complete rehabilitation of those buildings (Attachment A, Figure 4). This is

in order to move the Chipper JC to full operational capacity. The DOT is proposing three

with may require further study and additional strengthening.

of the buildings. The study analyzed the buildings, but did not analyze the foundations,

foundation. These are the areas of building 1 that will require strengthening due to the current

November 29, 2016. One of the conclusions of the report is that the buildings will

MDAH is also included. These four alternatives, one of which is the Proposed Alternative, a fourth alternative, the No Action Alternative, one of which is the Proposed Alternative, are being considered.

Also, in 2016 the DOT committed with Land-Summers, Inc. on Jackson, Mississippi, to

perform additional research into historic resources within theARP and did not find any new

resources that would be eligible for listing in the NHP.
<table>
<thead>
<tr>
<th>No Action Alternative</th>
<th>Alternative 1</th>
<th>Alternative 2</th>
<th>Alternative 3</th>
</tr>
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<tbody>
<tr>
<td>Below Average</td>
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<tr>
<td>High</td>
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<tr>
<td>Below Average</td>
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<tr>
<td>Estimated Total Cost</td>
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Table 1: Summary of Alternatives
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<tr>
<th>Alternative</th>
<th>Total</th>
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<td>No Action</td>
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<td>Alternative 1</td>
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<td>Alternative 6</td>
<td>6,000</td>
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<tr>
<td>Alternative 7</td>
<td>520</td>
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<td>Alternative 8</td>
<td>320</td>
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<tr>
<td>Alternative 9</td>
<td>300</td>
</tr>
<tr>
<td>Alternative 10</td>
<td>332,187</td>
</tr>
</tbody>
</table>

Table 2: Gross Square Feet by Alternative
There are considerable uncertainties regarding the structural integrity/stability of key structural elements. A large-scale replacement and reinforcement of these elements might be necessary.

Alternative, including the following:

While Alternative 1 preserves the original buildings, several challenges are associated with this and 2 and within the site in spaces currently designated for parking.

Parking spaces for 90 vehicles would be available across 20th Street from Buildings 1 and 2.

A central security plan to serve the campus would be added.

In current appearance to Buildings 1 and 2.

Skills training for occupations in demand. The new vocational building would be similar old elementary school. To accommodate vocational training and provide shop-related.

A new, 15,000-square-foot (SF) building would be constructed on the site of the

All modular buildings currently being used on-site would be removed.

Buildings 10 and 11 (dormitories) would be used as is.

Photograph 1: Building 1, West Elevation

Photograph 2: Building 1, South Elevation

Photograph 3: Building 2, South Elevation

Photograph 4: Building 2, South Elevation

Other construction related to this Alternative includes the following:
Recreation into their overall job corps experience. 

Elevated areas that look out over the campus have been designed to provide a sense of the building's size and proportion. The location of the recreation floor in the existing building allows for views of the campus and the surrounding area. The large windows also provide natural light and views of the outside environment.

In terms of providing support and convenience for the Job Corps, locker rooms in the existing building are not conducive to the Job Corps mission. Presented below is the proposed solution for locker rooms, which would be located in the new addition. The locker rooms would be larger and more accommodating for the Job Corps needs.

The existing building is not accessible to the disabled. The new building would provide a solution to this problem by providing accessibility for all individuals.

Recreational facilities include the following:

- The inclusion of a large weight room.
- The inclusion of a swimming pool.
- The inclusion of a gymnasium.
- The inclusion of a multi-purpose room.

Although the overall GSF of the proposed building is greater than the existing building, it would be located at a lower elevation, providing a better view of the surrounding area. The new building would also provide additional space for the Job Corps needs.

Numerous features and exterior columns show signs of excessive deterioration due to weather exposure. These could need to be replaced or renovated, and the entire roof would require replacement and renovation to prevent future moisture damage.
Alternative 2: New Construction

Physical demolition is determined it would support the school's programming requirements, which would support the entrance usable space. No foundation would be required, which would restrict usable space. The foundation would need to be replaced and then to the walls. A hazardous material system would be required. The existing roof system would need to be replaced and then to the walls. Additional, the entire roof system would need to be replaced and then to the walls. The existing roof system would need to be replaced and then to the walls. Additionally, the roofing material and the roof systems would need to be replaced and then to the walls. The existing roof system would need to be replaced and then to the walls. The existing roof system would need to be replaced and then to the walls. Additionally, the roofing material and the roof systems would need to be replaced and then to the walls. The existing roof system would need to be replaced and then to the walls. The existing roof system would need to be replaced and then to the walls. Additionally, the roofing material and the roof systems would need to be replaced and then to the walls. The existing roof system would need to be replaced and then to the walls. The existing roof system would need to be replaced and then to the walls. Additionally, the roofing material and the roof systems would need to be replaced and then to the walls.
Although some features of buildings 1 and 2 would be retained in this alternative, the two buildings would be physically joined by a covered walkway. Buildings 1 and 2 would be constructed on the old elementary school grounds to serve as a new, modern cafeteria. Other new construction would be done to accommodate increased enrollment for parking.

The Preferred Alternative would result in a modern job corps instructional campus. While the 90-acre site on which the current campus is located was acquired to satisfy the Federal energy conservation and design requirements, the 106-acre site on which the Preferred Alternative would be located would be remained as a part of the federal energy conservation and design requirements. The construction of buildings 10 and 11 would be retained.

For instance, this alternative would be modeled and replaced by a new, modern cafeteria. Other construction would be done to accommodate increased enrollment for parking.

Exhibit 3/Preferred Alternative: Remain Existing Buildings

Although some features of buildings 1 and 2 would be retained in this alternative, the two buildings would be physically joined by a covered walkway. Buildings 1 and 2 would be constructed on the old elementary school grounds to serve as a new, modern cafeteria. Other new construction would be done to accommodate increased enrollment for parking.

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Alternative 4: No Action Alternative

The No Action Alternative would maintain the Gulfport JCC campus in its current configuration and functionality. The dormitories and modular buildings would be retained and used as is, to the extent feasible for the temporary modular structures. The student capacity would remain at 1,070 students. Training in vocational trades, other than electrical, would remain available to students. Buildings 1, 2, and 3 would continue to be utilized. The dormitory rooms, which are to be converted to classrooms, would continue to be used for the same purposes as before.

The DOL has issued the draft EA on November 16, 2016, analyzing impacts related to this project and proposing the same alternatives outlined above. DOL plans to complete the consultation for Section 106 concurrently with the NEPA process. The DOL plans on conducting a public meeting in January 2017, after the 30-day comment period for the draft EA and this Section 106 consultation. Dates and times will be forthcoming to you as soon as they are scheduled.

Sincerely,

[Signature]

Lenita Jacobs-Simmons
National Director
Office of Job Corps

cc: Charlene Dwin Vaughn, AICP
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Southern District Director

Mavis Franke

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The City of Culpeort
John Kelli, Chief Administrative Officer

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Mississippi Department of Archives and History
Kenneth H. Pool, Deputy State Historic Preservation Officer
Figure 4. Alliedville Site Plan

Storage and Maintenance
Recreational (Building Z)
Dormitory
Calera (Building G)
Administration/Education (Building I)
Energy Plant
Vocational Trades

Gulfport, Mississippi
Gulfport Job Corps Center