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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<td>3</td>
<td>ACM Asbestos-containing materials</td>
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<tr>
<td>4</td>
<td>ADA Americans with Disabilities Act</td>
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<tr>
<td>5</td>
<td>BEA Bureau of Economic Analysis</td>
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<td>6</td>
<td>BLS U.S. Bureau of Labor Statistics</td>
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<td>7</td>
<td>BMPs Best management practices</td>
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<td>CDBG Community Development Block Grant</td>
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<td>CEQ Council on Environmental Quality</td>
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<td>CH4 Methane</td>
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<td>CZMA Coastal Zone Management Act</td>
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<tr>
<td>15</td>
<td>dBA Decibels on the A-weighted scale</td>
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<td>EO Executive Order</td>
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<td>21</td>
<td>FEMA Federal Emergency Management Agency</td>
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<tr>
<td>22</td>
<td>FONSI Finding of No Significant Impact</td>
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<tr>
<td>23</td>
<td>GHG Greenhouse gas</td>
</tr>
<tr>
<td>24</td>
<td>GSF Gross square feet</td>
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<tr>
<td>25</td>
<td>GRPC Gulf Regional Planning Commission</td>
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<td>26</td>
<td>HABS Historic American Building Survey</td>
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<td>27</td>
<td>HFC Hydrofluorocarbons</td>
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<td>28</td>
<td>HUD U.S. Department of Housing and Urban Development</td>
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<td>29</td>
<td>HVAC Heating, ventilation, and air conditioning</td>
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<td>30</td>
<td>JCC Job Corps Center</td>
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<td>31</td>
<td>LBP Lead-based paint</td>
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<tr>
<td>32</td>
<td>MDAH Mississippi Department of Archives and History</td>
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<td>33</td>
<td>MDEQ Mississippi Department of Environmental Quality</td>
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<tr>
<td>34</td>
<td>NAAQS National Ambient Air Quality Standards</td>
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<td>35</td>
<td>NCBC Naval Construction Battalion Center</td>
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<td>36</td>
<td>NEPA National Environmental Policy Act</td>
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<td>37</td>
<td>NHPA National Historic Preservation Act</td>
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<tr>
<td>38</td>
<td>NO2 Nitrogen dioxide</td>
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<td>39</td>
<td>N2O Nitrous oxide</td>
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<td>40</td>
<td>NRHP National Register of Historic Places</td>
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<td>41</td>
<td>O3 Ozone</td>
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<tr>
<td>42</td>
<td>OMS Outcome Measurement System</td>
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<td>43</td>
<td>OSHP Occupational Safety and Health Administration</td>
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<tr>
<td>44</td>
<td>PCBs Polychlorinated biphenyls</td>
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<td>45</td>
<td>Pb Lead</td>
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<td>46</td>
<td>PFC Perfluorocarbons</td>
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<td>47</td>
<td>PM-2.5 Particulate&lt;2.5 micrometers</td>
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1.0 INTRODUCTION

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

The 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. The Job Corps addresses the multiple barriers to employment faced by disadvantaged youth throughout the United States.

In conjunction with this national strategy, DOL proposes to redevelop the Gulfport Job Corps Center (JCC) so that it can provide training for the 280-student capacity for which it was originally designed. This project would support and enhance the Job Corps’ educational and training mission and ensure that its facilities continue to provide an optimal environment for students and Job Corps personnel.
2.0 PURPOSE OF AND NEED FOR ACTION

2.1 Project Location

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

2.2 Background

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

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

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

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

In the State of Mississippi, over 7,000 youth have contacted the Job Corps over the last 14 months, seeking to enroll in JCC programs. In addition, over 9,000 eligible youth who reside in Louisiana and Alabama have contacted Job Corps to enroll. Based on national averages, about 75 percent of those youth (approximately 12,000) are actually eligible to enroll in Job Corps based on age, income, and other requirements. Since 2015, the Gulfport JCC and the other JCCs in the State of Mississippi have provided services to 1,501 of the approximately 12,000 eligible students.
Figure 1. Vicinity Map
Figure 3. Gulfport JCC Existing Site Plan
The Job Corps’ Outcome Measurement System (OMS) is a measure of center performance. The ranking is based on:

- Placement in employment or higher education
- Attainment of a degree or certificate
- Literacy and numeracy gains
- Efficiency/cost per participant

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

2.3 Purpose and Need

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

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

<table>
<thead>
<tr>
<th>Table 1. DOL Program Guidelines for Space at JCCs</th>
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<tbody>
<tr>
<td>Function</td>
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<tr>
<td>Main Building (Administration, Education, Medical/Dental)</td>
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<td>Education – Hard Vocational</td>
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<td>Storage/Maintenance</td>
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<td>Food Service</td>
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<td>Recreation</td>
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<td>Energy Plant</td>
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<td><strong>Total</strong></td>
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2.4 Scope and Content of the Environmental Assessment

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

2.5 Decision to Be Made

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

2.6 Public Participation

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

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

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

3.1 Alternative 1: Rehabilitate Existing Buildings

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

A central energy plant to serve the campus would be added. 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.

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

- Although the overall GSF of a renovated Building 1 compares favorably to that which would be built as part of the design of new structures (Alternative 2), the restrictions inherent in renovating the existing building would yield less usable space and result in a less than optimal space layout for the various functions that the Job Corps needs. These restrictions include the following:
  - Overly wide corridors subtract from the total usable space (Photograph 2).
Gulfport Job Corps Center
Gulfport, Mississippi

Vocational Trades
Energy Plant
Administration/Education (Building 1)
Cafeteria (Building 5)
Dormitory
Recreation (Building 2)
Storage and Maintenance

Figure 4. Alternative 1 Site Plan
Renovation of the building to comply with accessibility guidelines for the two half-stairwells on the lower floor of the building subtracts from the amount of usable space.

Restrictions imposed by the corridor walls result in the separation of related administrative functions.

Renovating the existing building results in less than optimal classroom sizes for some soft trade courses, such as Nurse’s Assistant.

The layout makes it more difficult to maintain separation of incoming students from the remainder of the student body during their orientation period, something that is considered essential to providing new students the opportunity to assimilate to their new environment.

The intrusion of the new concrete shear walls for stabilization of the structures will encroach on currently usable space.

It is estimated that the reduction in usable space in Building 1 could be as much as 5 percent, when compared to that for a new structure. The resulting cumbersome nature of the functional layout of the renovated Building 1 is difficult to measure, but carries with it inefficiencies that affect the day-to-day function of Gulfport JCC staff and fails to provide an optimal space layout that enhances the environment for the students at the Center.

Building 2, the gymnasium, does not meet current program standards for recreation, providing only 53.6 GSF per student compared to the 65.3 GSF per student recommended by DOL program guidelines, or approximately 18 percent less space than the program guidelines recommend. It lacks space for locker rooms, arts and crafts, weight rooms, and aerobic rooms. The existing facility spaces that served as locker rooms in the past (located under the bleachers) are not conducive to the Job Corps environment in terms of providing supervision and providing comfortable spaces that have natural light.

Rehabilitation of Building 2, the gymnasium, does not adhere to the campus design that Job Corps has found to best serve the students. Placement of the recreation building near the dormitories enhances the usage of the building during evening and weekend hours, which is advantageous to the students incorporating the social aspects of recreation into their overall Job Corps experience.

Space available for construction of the vocational trades building is limited, resulting in an estimated 35 percent less space for training for trades than is recommended by DOL program guidelines. The space available for a vocational trades building is limited by 1) the location of the existing cafeteria (Building 5); 2) the need to construct the vocational trades building in a location that provides the required street access for the shop bays; and 3) City of Gulfport setback requirements. As a result, the vocational trades building would have four shop bays for training instead of the desired seven shop bays, thereby limiting training opportunities for Gulfport JCC students and impacting the amount and types of training provided to meet the needs of companies in the region.

Building 5, the cafeteria (Photograph 3), does not meet current standards for food service, providing only 24.4 GSF per student, compared to the 32.4 GSF per student recommended by DOL program

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

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

3.2 Alternative 2: New Construction

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

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. Design would take an estimated 12 months, and construction would take an estimated 22 months.

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

Figure 6. Preferred Alternative Site Plan

Legend:
- Magenta: Vocational Trades
- Light Brown: Energy Plant
- Green: Administration/Education
- Dark Blue: Cafeteria
- Light Blue: Dormitory
- Orange: Recreation
- Yellow: Storage and Maintenance

Scale in Feet:
0 60 120 240

Gulfport Job Corps Center
Gulfport, Mississippi

Figure 6. Preferred Alternative Site Plan
Challenges associated with the Preferred Alternative include the following:

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

3.4 Alternative 4: No Action Alternative

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

3.5 Alternatives Considered but Eliminated

3.5.1 Building Stabilization and Preservation

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

3.6 Comparison of Alternatives

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

<table>
<thead>
<tr>
<th>Alternative 1</th>
<th>Alternative 2</th>
<th>Alternative 3 (Preferred)</th>
<th>Alternative 4</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Renovation</strong></td>
<td><strong>Demolition/Removal</strong></td>
<td><strong>New Construction</strong></td>
<td><strong>No Action Alternative</strong></td>
</tr>
<tr>
<td>Rehabilitate Buildings 1, 2, and 5</td>
<td>Remove modular buildings and demolish Building 9</td>
<td>Construct vocational building, storage/maintenance building, and new energy plant.</td>
<td>No renovation</td>
</tr>
<tr>
<td>No renovation</td>
<td>Demolish Buildings 1, 2, 5, and 9 and remove all modular buildings</td>
<td>All new construction</td>
<td>No demolition/removal</td>
</tr>
<tr>
<td>Significant reinforcement would be needed to maintain structural integrity.</td>
<td></td>
<td>Construct new buildings behind the façades of Buildings 1 and 2. Construct new cafeteria, hard vocational building, storage and maintenance building, and energy plant.</td>
<td>No new construction</td>
</tr>
<tr>
<td><strong>Estimated Total Cost</strong></td>
<td><strong>Time Required for Completion</strong></td>
<td><strong>Functionality for Job Corps</strong></td>
<td></td>
</tr>
<tr>
<td>$35,000,000</td>
<td>36 months</td>
<td>Below average</td>
<td></td>
</tr>
<tr>
<td>$28,000,000</td>
<td>34 months</td>
<td>High</td>
<td></td>
</tr>
<tr>
<td>$30,000,000</td>
<td>44 months</td>
<td>Above average</td>
<td></td>
</tr>
<tr>
<td>No additional costs would occur unless buildings reach a level of deterioration that would require demolition</td>
<td>Not applicable; no construction needed</td>
<td>Not applicable</td>
<td></td>
</tr>
</tbody>
</table>
## Table 3. Gross Square Feet by Alternative

<table>
<thead>
<tr>
<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Administration, Education, Medical/Dental</td>
<td>32,718</td>
<td>35,520</td>
<td>35,620</td>
<td>36,800</td>
<td>13,000</td>
</tr>
<tr>
<td>Education/Training – Hard Vocational</td>
<td>23,100</td>
<td>15,000</td>
<td>24,500</td>
<td>18,800</td>
<td>1,200</td>
</tr>
<tr>
<td>Storage and Maintenance</td>
<td>6,847</td>
<td>7,200</td>
<td>6,500</td>
<td>7,200</td>
<td>6,000</td>
</tr>
<tr>
<td>Food Service</td>
<td>9,072</td>
<td>6,820</td>
<td>9,280</td>
<td>9,280</td>
<td>3,000</td>
</tr>
<tr>
<td>Recreation</td>
<td>18,270</td>
<td>15,000</td>
<td>20,320</td>
<td>20,320</td>
<td>0</td>
</tr>
<tr>
<td>Energy Plant</td>
<td>2,800</td>
<td>2,800</td>
<td>2,800</td>
<td>2,800</td>
<td>0</td>
</tr>
<tr>
<td>Total</td>
<td>92,807</td>
<td>82,340</td>
<td>98,920</td>
<td>95,200</td>
<td>23,200</td>
</tr>
</tbody>
</table>
### Table 4. Summary of Impacts

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Cultural Resources</td>
<td>No adverse impacts on the existing buildings, based on a previous determination by the Mississippi SHPO.</td>
<td>Permanent, major adverse impacts on historic buildings. Mitigation could be provided.</td>
<td>Adverse impacts on historic buildings would be resolved through mitigation, so there would be no significant impacts on cultural resources.</td>
<td>Existing historic buildings would continue to deteriorate, resulting in permanent, major adverse effects on cultural resources.</td>
</tr>
<tr>
<td>Land Use and Aesthetics</td>
<td>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.</td>
<td>Minor permanent impacts on land use with new construction on the site. Beneficial impacts on aesthetics with new buildings replacing the damaged buildings.</td>
<td>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.</td>
<td>No impacts on land use. Permanent, adverse impacts on aesthetics for area residents, as well as students, faculty, and staff at the Gulfport JCC.</td>
</tr>
<tr>
<td>Water Resources</td>
<td>Negligible impacts on water resources or adjoining waterways.</td>
<td>Negligible impacts on water resources or adjoining waterways.</td>
<td>Negligible impacts on water resources or adjoining waterways.</td>
<td>No construction, so no impacts on water resources.</td>
</tr>
<tr>
<td>Air Quality</td>
<td>Temporary, minor air quality impacts during construction.</td>
<td>Temporary, minor air quality impacts during construction.</td>
<td>Temporary, minor air quality impacts during construction.</td>
<td>Potential minor impacts on air quality from asbestos-containing materials (ACM) if a significant wind event causes a roof fracture.</td>
</tr>
<tr>
<td>Hazardous Materials</td>
<td>Temporary, negligible impacts from hazardous substances or wastes.</td>
<td>Temporary, negligible impacts from hazardous substances or wastes.</td>
<td>Temporary, negligible impacts from hazardous substances or wastes.</td>
<td>Potential minor impacts from ACM if a significant wind event causes a transite panel sub-roofing fracture.</td>
</tr>
<tr>
<td>Health and Safety</td>
<td>Construction-related impacts would be temporary and negligible. Permanent, moderate effects on health and safety during operations.</td>
<td>Construction-related impacts would be temporary and negligible. Negligible impacts on health and safety during operations.</td>
<td>Construction-related impacts would be temporary and negligible. Negligible impacts on health and safety during operations.</td>
<td>Potential minor health impacts from ACM if a significant wind event causes a transite panel sub-roofing fracture.</td>
</tr>
<tr>
<td>-----------------------</td>
<td>----------------------------------------------</td>
<td>---------------------------------</td>
<td>-----------------------------------------------------</td>
<td>-------------------------------------</td>
</tr>
<tr>
<td>Transportation and Traffic</td>
<td>Temporary, minor adverse impact associated with construction. Permanent, minor adverse impacts associated with additional employees and additional day students.</td>
<td>Temporary, minor adverse impacts associated with construction. Permanent, minor adverse impacts associated with additional employees and additional day students.</td>
<td>Temporary, minor adverse impacts associated with construction. Permanent, minor adverse impacts associated with additional employees and additional day students.</td>
<td>No impacts on traffic.</td>
</tr>
<tr>
<td>Socioeconomics</td>
<td>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.</td>
<td>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.</td>
<td>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.</td>
<td>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.</td>
</tr>
</tbody>
</table>
4.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

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

Resources to be analyzed in this EA include the following:

- Cultural Resources
- Land Use and Aesthetics
- Water Resources
- Air Quality
- Noise
- Utilities Infrastructure
- Hazardous Materials
- Health and Safety
- Traffic and Transportation
- Socioeconomics

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

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

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

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

- No impact: The action does not cause a detectable change.
- Negligible: The impact is at the lowest level of detection.
• Minor: The impact is slight but detectable.
• Moderate: The impact is readily apparent.
• Major: The impact is severely adverse or exceptionally beneficial.

4.1 Cultural Resources

4.1.1 Regulatory Environment

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

4.1.2 Affected Environment

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

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

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

The history of the 33rd Avenue High School begins in the days of “Separate but Equal,” which was a doctrine established by the Supreme Court in the Plessy vs. Ferguson U.S. Supreme Court case of 1896, which established that the Equal Protection clause of the Constitution would not be violated if different races were taught separately from each other, as long as the educational qualities were equal to each other. In support of that doctrine, in 1921 a two-story wood-framed building was constructed on the current site. It served as the school for all ages of African-American students in the City of Gulfport. After a fire destroyed that building, a single-story masonry building was constructed in 1930 to serve as the school. This building later became the elementary school after the current high school buildings, Buildings 1, 2, and 5, were constructed in 1954 (33rd Avenue High School Alumni 2016).
Even though “Separate but Equal” was law in the United States, the State of Mississippi did not support each school system equally. White facilities were often large and new, and black facilities were often one-room schoolhouses or sheds in the back of mills. Salaries for black teachers were well below what their white counterparts earned, and the total spent on black students was a fraction of what was spent on white students. For the 1942-43 school year, for example, Mississippi spent $47.95 per white student, but only $6.16 on each black student (Bolton 2000).

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

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

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

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

**4.1.3 Environmental Consequences**

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

**Alternative 1: Rehabilitate Existing Buildings**

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

**Alternative 2: New Construction**

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

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

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

**Alternative 4: No Action Alternative**

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

4.2 Land Use and Aesthetics

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

4.2.1 Affected Environment

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

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

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

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

**Alternative 1: Rehabilitate Existing Buildings**

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

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

**Alternative 2: New Construction**

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

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

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

**Alternative 4: No Action Alternative**

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

4.3 Water Resources

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

4.3.1 Regulatory Setting

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

1. Determine whether the action would occur in, or stimulate development in, a floodplain.
2. Receive public review/input of the Proposed Action.
3. Identify and evaluate practicable alternatives to locating in the floodplain.
4. Identify the impacts of the Proposed Action (when it occurs in a floodplain).
5. Minimize threats to life, property, and natural and beneficial floodplain values, and restore and preserve natural and beneficial floodplain values.

6. Reevaluate alternatives in light of any new information that might have become available.

7. Issue findings and a public explanation.

8. Implement the action.

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

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

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

4.3.2 Affected Environment

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

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

4.3.3 Environmental Consequences

Proposed construction would occur within the 100-year floodplain for Brickyard Bayou. Because the buildings to be constructed on the Gulfport JCC campus are limited in their configuration by historical property rehabilitation considerations, there are no alternative building sites at the current Gulfport JCC location that can be considered to avoid building in the 100-year floodplain. Activities would be coordinated with the Floodplain Administrator for the City of Gulfport and would comply with the FEMA 8-step process.
Figure 7. 100-Year Floodzone
For construction, fill material would be placed in the floodplain to raise the finished floor elevation to 3 feet above the 100-year base flood elevation. The amount of floodplain area that would be filled for the action alternatives is approximately 5,000 square feet. Foundation walls would be designed to eliminate any rise to the 100-year flood elevation, in accordance with American Society of Civil Engineers (ASCE) 24.

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

**Alternative 1: Rehabilitate Existing Buildings**

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

**Alternative 2: New Construction**

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

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

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

**Alternative 4: No Action Alternative**

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

### 4.4 Air Quality

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

#### 4.4.1 Regulatory Setting

The status of the air quality in a given area is determined by concentrations of various pollutants in the atmosphere. The Federal Clean Air Act (42 U.S.C. 7401-7671q) requires the U.S. Environmental Protection Agency (USEPA) to establish a series of National Ambient Air Quality Standards (NAAQS) for air quality pollutant levels throughout the United States. The NAAQS are included in Table 5 (USEPA 2016). The General Conformity Rule (40 CFR 51.850-860 and CFR 93.150-160) requires any Federal agency responsible for an action in a non-attainment or
maintenance area for the NAAQS to determine that the action is either exempt from the General
Conformity Rule’s requirements and complete a Record of Non-applicability or positively
determine that the action conforms to the provisions and objectives of the State Implementation
Plan (SIP).

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

Table 5. National Ambient Air Quality Standards

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


4.4.2 Affected Environment

The Proposed Action would occur within Harrison County, Mississippi, which is designated as
“in attainment” for all USEPA NAAQS criteria pollutants (USEPA 2016); therefore, it is not
subject to 40 CFR, Part 93 Federal General Conformity Rule regulations.
Environmental Assessment for Rehabilitation or Replacement of Buildings at the Gulfport Job Corps Center

4.4.3 Environmental Consequences

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

Alternative 1: Rehabilitate Existing Buildings

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

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

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

Alternative 2: New Construction

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

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

As under Alternative 1, no significant impacts would occur regarding GHG and climate change as a result of implementing Alternative 2.
Preferred Alternative (Alternative 3): *Retain Existing Façades*

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

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

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

**Alternative 4: No Action Alternative**

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

### 4.5 Noise

#### 4.5.1 Regulatory Setting

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

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

#### 4.5.2 Affected Environment

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

#### 4.5.3 Environmental Consequences

This section describes the potential impacts from noise that could result from the alternatives, including the No Action Alternative.
Alternative 1: Rehabilitate Existing Buildings

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

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

Alternative 2: New Construction

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

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

Preferred Alternative (Alternative 3): Retain Existing Façades

Noise impacts would be similar to Alternative 2.

Alternative 4: No Action Alternative

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

4.6 Utilities Infrastructure

4.6.1 Affected Environment

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

Alternative 1: Rehabilitate Existing Buildings

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

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

Alternative 2: New Construction

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

Preferred Alternative (Alternative 3): Retain Existing Façades

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

Alternative 4: No Action Alternative

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

4.7 Hazardous Materials

4.7.1 Regulatory Setting

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

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

TSCA Subchapter I, “Control of Toxic Substances” (§§ 2601-2629), regulates the disposal of PCB-containing products, sets limits for PCB levels present within the environment, and authorizes the remediation of sites contaminated with PCBs. Subchapter II, “Asbestos Hazard...
Emergency Response” (§§ 2641-2656), authorizes the USEPA to impose requirements for asbestos abatement in schools and requires accreditation of those who inspect ACM. Subchapter IV, “Lead Exposure Reduction” (§§ 2681-2692), requires the USEPA to identify sources of lead contamination in the environment, to regulate the amounts of lead allowed in products, and to establish state programs that monitor and reduce lead exposure.

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

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

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

4.7.3 Environmental Consequences

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

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

Alternative 2: New Construction
Alternative 2 would involve demolition and removal of Buildings 1, 2, 5, and 9, including ACM and LBP remaining in those buildings. Regulations covering the removal and disposal of ACM and LBP would specify BMPs required to protect the public’s health and prevent uncontrolled generation of hazardous wastes. By following the regulatory requirements of permits issued for demolition and disposal of the buildings, impacts due to generation of hazardous wastes would be minor. All hazardous waste would be properly disposed of by permitted individuals. As with Alternative 1, construction-related BMPs would be in place, no hazardous substances would be
used during construction of new buildings, and no hazardous substances in regulated quantities would be stored or used during operation of the Gulfport JCC after completion. Therefore, there would be negligible impacts from hazardous substances or wastes due to implementation of Alternative 2.

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

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

**Alternative 4. No Action Alternative**

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

**4.8 Health and Safety**

**4.8.1 Regulatory Setting**

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

**4.8.2 Affected Environment**

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

**4.8.3 Environmental Consequences**

**Alternative 1: Rehabilitate Existing Buildings**

During construction, all applicable OSHA rules and regulations would be followed by project contractors. Heavy equipment operation areas and interior demolition sites would be secured to prevent inadvertent public access. Alternative 1 would require additional removal of the interior and exterior of Buildings 1, 2, and 5, including some hazardous materials, as discussed previously in Section 4.7.3. Adherence to permit requirements and BMPs would minimize impacts on health and safety. Construction-related impacts would be temporary and negligible.
The buildings would be rehabilitated to meet required building health and safety codes; however, the current building layouts would prevent the use of layouts that enhance personal safety and allow natural lighting that is now recognized to foster a healthy learning environment. Rehabilitation of Building 1, with its long hallways, hidden stairwells, and lack of common spaces to break up the functions, would result in a number of locations in the building that would be difficult to supervise adequately, as well as a much less healthy and satisfying learning environment.

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

Alternative 2: New Construction

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

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

Preferred Alternative (Alternative 3): Retain Existing Façades

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

Alternative 4: No Action Alternative

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

4.9.1 Affected Environment

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

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

4.9.2 Environmental Consequences

Alternative 1: Rehabilitate Existing Buildings

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

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

Alternative 2: New Construction

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

Preferred Alternative (Alternative 3): Retain Existing Façades

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

Alternative 4: No Action Alternative

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

4.10 Socioeconomics

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

The Gulfport JCC has approximately 70 full-time and part-time employees serving the 107 students currently enrolled. Approximately 33 additional employees would be expected when enrollment returns to the target number of 280 students, for an expected total employment of 103. Expenditures by both employees and students would be expected to be made in the local...
economy. Of the 280 students, 220 are expected to live on-campus, and 60 are expected to be non-residential students.

4.10.1 Regulatory Setting

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

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

4.10.2 Affected Environment

Population Demographics

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

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

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)

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

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

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

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

<table>
<thead>
<tr>
<th>Geographical Area</th>
<th>High School Credential or Higher (Percent)</th>
<th>Bachelor's Degree or Higher (Percent)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Harrison County</td>
<td>86</td>
<td>21</td>
</tr>
<tr>
<td>City of Gulfport</td>
<td>84</td>
<td>20</td>
</tr>
<tr>
<td>Census Tract 23</td>
<td>77</td>
<td>15</td>
</tr>
<tr>
<td>Mississippi</td>
<td>82</td>
<td>20</td>
</tr>
<tr>
<td>United States</td>
<td>86</td>
<td>29</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau 2015c

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).

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).

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.
Table 10. Housing Units

<table>
<thead>
<tr>
<th>Geographic Area</th>
<th>Total Housing Units</th>
<th>Median Value</th>
<th>Occupied</th>
<th>Homeowner Vacancy Rate*</th>
<th>Rental Vacancy Rate**</th>
</tr>
</thead>
<tbody>
<tr>
<td>Harrison County</td>
<td>87,824</td>
<td>$139,600</td>
<td>59.1</td>
<td>40.9</td>
<td>3.2</td>
</tr>
<tr>
<td>City of Gulfport</td>
<td>32,878</td>
<td>$120,600</td>
<td>51.6</td>
<td>48.4</td>
<td>4.5</td>
</tr>
<tr>
<td>Census Tract 23</td>
<td>1,070</td>
<td>$89,000</td>
<td>42.4</td>
<td>57.6</td>
<td>0.0</td>
</tr>
<tr>
<td>Mississippi</td>
<td>1,284,794</td>
<td>$100,800</td>
<td>68.9</td>
<td>31.1</td>
<td>2.0</td>
</tr>
<tr>
<td>United States</td>
<td>132,741,033</td>
<td>$175,700</td>
<td>64.4</td>
<td>35.6</td>
<td>2.1</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau 2015d

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

Community Cohesion
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.

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.

Schools
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.

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.

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

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

<table>
<thead>
<tr>
<th>Minority (Percent)</th>
<th>All Ages in Poverty (Percent)</th>
<th>Under Age 18 in Poverty (Percent)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Harrison County</td>
<td>34</td>
<td>20.0</td>
</tr>
<tr>
<td>City of Gulfport</td>
<td>46</td>
<td>25.5</td>
</tr>
<tr>
<td>Census Tract 23</td>
<td>65</td>
<td>41.2</td>
</tr>
<tr>
<td>Mississippi</td>
<td>42</td>
<td>22.6</td>
</tr>
<tr>
<td>United States</td>
<td>37</td>
<td>15.6</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau 2015b

**Protection of Children**

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

**4.10.3 Environmental Consequences**

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

The Gulfport JCC is located within Census Tract 23 (Harrison County), which is a low-income, high-minority neighborhood, as shown previously in Table 13. To comply with the CEQ requirement for “early and meaningful public participation,” a public scoping meeting was held on June 14, 2016, in the Gulfport City Council Chambers, to present the proposed alternatives to the local community and gather feedback from attendees regarding the proposed alternatives. A meeting notice was published in the local newspaper (*Biloxi Sun Herald*) and invitation letters were sent by DOL Job Corps to representatives from MDAH, the City of Gulfport, the Office of Senator Thad Cochran, the President of the 33rd Avenue High School Alumni Association, the Quarters Group, and the ACHP. Thirty-four citizens attended (23 local citizens; 10 city, county, and state officials; and a representative from the ACHP), in addition to six DOL and Job Corps officials and two contractors preparing this EA. A summary of the meeting discussion and written comments is included in Appendix B.
In addition, a public meeting to present information on the Section 106 review is planned for late 2016, in the Gulfport City Council Chambers. Information on the Section 106 meeting, attendance, and results/outcomes will be included in Appendix C in the Final EA.

**Alternative 1: Rehabilitate Existing Buildings**

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

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

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

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

**Alternative 2: New Construction**

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

Alternative 2 is the optimal way to meet needs of Gulfport JCC students, providing benefits for the students in the form of more options for training, and benefits to the community in the form of well-trained workers. However, Alternative 2 would not preserve the 33rd Avenue High
School’s historically significant and NRHP-eligible structures, as desired by many residents of areas surrounding the school, 33rd Avenue High School graduates, and historic preservation advocates who desire to see the school rehabilitated.

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

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

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

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

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

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

While the Preferred Alternative would not provide full rehabilitation of the original 33rd Avenue High School structures, the street-facing facades of the original buildings would be preserved, thereby preserving much of the school’s outward appearance. Forty-eight percent of the comment cards received during and after the public meeting indicated that those residents would be supportive of the Preferred Alternative. This response and comments at the public meeting regarding support for a facility that is best for the students indicate that a substantial percentage of the vocal residents would not view the Preferred Alternative as adversely impacting minority and low-income populations. There would be no disproportionately high or adverse impacts on the health and safety of children with the implementation of the Preferred Alternative.
Alternative 4: No Action Alternative

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

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

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

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

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

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

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

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

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

Restoration of the Port of Gulfport began in 2012 after several years of preparation. The $566 million project is expected to be completed in late 2017. The project is being funded with Community Development Block Grant (CDBG) funds through the U.S. Department of Housing and Urban Development (HUD). Since 2012, port construction has provided more than 1,000 construction jobs to area residents, and the project is expected to create more than 1,300 new, permanent jobs, with a target of quality jobs for low-to-moderate income residents of a three-county area that includes Harrison County.
Other ongoing, recently completed, and reasonably foreseeable projects in the region include the Gulfport Aquarium; Centennial Plaza, a mixed-use development at the site of the former Gulfport Veterans Administration Medical Center; and a Marine Science Center being developed by the University of Southern Mississippi. The area is also experiencing substantial new residential development, including but not limited to development along Highway 90 in response to a tax abatement district established in 2015, as well as construction and rehabilitation of various highways and roads within the ROI.

5.1 Analysis of Cumulative Impacts

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

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

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

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

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

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

Utilities

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

Hazardous Materials

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

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

Health and Safety

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

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

Traffic and Transportation

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

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

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

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

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

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

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

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

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

33rd Avenue High School Alumni. 2016. Website information. Internet URL: http://www.ms10most.com/listing/33rd-avenue-high-school/


Mississippi Department of Education. Harrison County School District (2400) and Gulfport School District (2421). 2015-2016. Internet URL: http://reports.mde.k12.ms.us/


USEPA 2016. National Ambient Air Quality Standards Table – Criteria Air Pollutants. Internet URL: http://www.epa.gov/criteria-air-pollutants/naaqs-table
8.0 LIST OF PREPARERS

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

<table>
<thead>
<tr>
<th>Name</th>
<th>Agency/Organization</th>
<th>Discipline/Expertise</th>
<th>Experience</th>
<th>Role in Preparing EA</th>
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<tbody>
<tr>
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<tr>
<td>Chris Ingram</td>
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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
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    Gayle Tart, Esquire
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    Long Beach, MS 39560
Proof of Publication

STATE OF MISSISSIPPI
COUNTY OF HARRISON

Before me, the undersigned Notary of Harrison County, Mississippi personally appeared Crista 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 ______ times in the following numbers and on the following dates of such paper, viz:

Vol. 132 No., 239 dated 28 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____

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

Clerk

PAID

Sworn to and subscribed before me this 1 day of

A.D., 20____

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
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 Guissinger – 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 Guissinger 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 Guissinger facilitated a discussion of the alternatives, which include 1) Rehabilitate 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.

Kenneth 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

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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.

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*One Comment Form was not signed; two comment forms were submitted by mail.
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NA – Not available