

DRAFT

Environmental Assessment

For

**Construction of a New
St. Martin High School
Ocean Springs, Mississippi**

For

**Jackson County, Mississippi
School Board**

FEMA-1604-DR-MS

Prepared for:

Federal Emergency Management Agency (FEMA)

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**Draft Environmental Assessment
Proposed New St. Martin High School
Hurricane Katrina
FEMA-1604-DR-MS**

1.0 INTRODUCTION

1.1 Disaster Background and Overview

FEMA proposes to provide assistance for this project through the Public Assistance Program (PA) under Presidential Disaster Declaration FEMA-1604-DR-MS. In accordance with 44 Code of Federal Regulations (CFR) for FEMA, Subpart B, Agency Implementing Procedures, Part 10.9, an Environmental Assessment (EA) was prepared pursuant to Section 102 of the National Environmental Policy Act (NEPA) of 1969, as implemented by the regulations promulgated by the President's Council on Environmental Quality (40 CFR Parts 1500-1508). The purpose of the EA is to analyze the potential environmental impacts of the proposed project, and to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

Hurricane Katrina made landfall on the southeastern coast of Louisiana and the southwestern coast of Mississippi on August 29, 2005, with maximum sustained winds of 140 mph. Hurricane-force winds extended outward up to 105 miles from the center of the storm. Coastal storm surge flooding of 20 to 30 feet above normal tide levels, along with large and dangerous battering waves, occurred near and to the east of where the center of the storm made landfall. Widespread damage occurred, including beach erosion and damage and/or destruction of homes and infrastructure.

Eighty-one counties in Mississippi were declared eligible for FEMA Public Assistance (assistance to State and local governments and certain private nonprofit organizations for the

repair or replacement of disaster-damaged facilities) under Presidential Disaster Declaration 1604-DR-MS on August 29, 2005.

Like many other public and private buildings on the Mississippi Gulf Coast, the extraordinary storm surge associated with Hurricane Katrina caused extensive damage to the St. Martin Attendance Center. The St. Martin Upper Elementary School and the St. Martin Middle School formerly located at 16304 Lemoyne Boulevard, Jackson County, Mississippi are part of the St. Martin Attendance Center. The Attendance Center consists of all schools in St. Martin. The school campuses were located approximately 300 meters north of the St. Martin Bayou, a bayou which drains into the Back Bay of Biloxi. More than fifteen feet of storm surge water inundated the two school's campuses, causing more than 50% destruction of all buildings including interior furnishings, equipment, plumbing, wiring and flooring. Due to the extent of the damages, all buildings were subsequently demolished.

The St. Martin Upper Elementary School facility consisted of a classroom building, a gymnasium, and a building containing classrooms, offices and a cafeteria, with a combined total space of 52,395 square feet. The St. Martin Middle School consisted of sixteen buildings with a combined total space of 99,251 square feet and included the following buildings: six classroom buildings; a science building; a cafeteria; a gymnasium; a vocational building; a field house, a maintenance storage building; a maintenance building; an industrial arts building; a bus maintenance building; and a concession building. The buildings eligible for reimbursement by FEMA under the new High School plans are only 11 of the buildings destroyed totaling 90,958 square feet. Students previously attending St. Martin Upper Elementary School and St. Martin Middle School are currently attending classes in temporary portable classroom buildings on Yellow Jacket Boulevard on the St. Martin Campus in Jackson County, Mississippi.

1.2 Purpose and Need

The purpose of the project is to permanently relocate the damaged educational facilities in the form of an improved project to be located on 16th Section Public Trust Lands owned by the Jackson County School District. The project will involve the construction of a new St. Martin High School. This new high school will replace the existing High School which will be converted to serve as the new Middle School, and the existing Junior High School will be converted to an Upper Elementary School.

The proposed new 168,185 square foot high school will be designed to support 2,508 students (with future additions of 26,400 square feet to support an additional 1122 students). The two story classroom wings will meet FEMA 361 Shelter requirements. FEMA 361 Design & Construction Guidance for Community Shelters provides for the design of engineered shelters that will protect large numbers of people during a high-wind event. Shelters designed by a professional according to the design and performance criteria outlined in this manual (including a design wind speed) are intended to minimize the probability of death and injury during a high-wind event by providing their occupants with near-absolute protection. These shelter projects are specifically funded through the HMGP 404 program. A site location map, a USGS map and an aerial map with the proposed location is outlined and included as Figures 1, 2 and 3 of Appendix A. The proposed building layout is included as Figure 4 in Appendix A.

The high school will be constructed of load-bearing, concrete masonry and brick composite walls; structural integrity will be designed to comply with FEMA 361 shelter wind load and impact resistance requirements. The load bearing composite walls will support structural pre-cast hollow-core concrete slabs over the classroom wings and structural, metal roof decking over the cafeteria, media center, and gymnasium.

The need for this project is due to the destruction of the St. Martin Upper Elementary and St. Martin Middle School facilities by Hurricane Katrina on August 29, 2005.

This Environmental Assessment has been prepared according to the National Environmental Policy Act as applied to FEMA 44 CFR Part 10. FEMA proposes to provide assistance to repair, restore, or relocate the school through the Public Assistance Program (PA) under Presidential Disaster Declaration FEMA-1604-DR-MS. In accordance with 44 Code of Federal Regulations (CFR) for FEMA, Subpart B, Agency Implementing Procedures, Part 10.9, an Environmental Assessment (EA) was prepared pursuant to Section 102 of the National Environmental Policy Act (NEPA) of 1969, as implemented by the regulations promulgated by the President's Council on Environmental Quality (40 CFR Parts 1500-1508). The purpose of the EA is to analyze the potential environmental impacts of the proposed project, and to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI). This section of the code requires FEMA to take into account environmental considerations before funding or approving actions.

This EA is intended to address specific issues relating to the application for funding from the Jackson County School District.

2.0 ALTERNATIVES CONSIDERED

2.1 Alternatives Analyzed and Dismissed

Repair/Re-construction of St. Martin Upper Elementary School and St. Martin Middle School in their previous locations at 16304 Lemoyne Boulevard, Biloxi

Re-construction of the buildings was not possible because the site is located within the new 100-year floodplain. The previously existing St. Martin Upper Elementary and St. Martin Middle School buildings were inundated with more than fifteen feet of water due to storm surge from the Back Bay of Biloxi during Hurricane Katrina and were more than 50% destroyed. The buildings were demolished. Reconstruction of new buildings constructed in this area would require elevation, and the schools would be located in a vulnerable location with respect to future hurricane storm surges.

2.2 Alternatives Further Evaluated

Site evaluation was limited to property owned by the Jackson County School District because acquisition of privately owned sites suitable for new school construction in the St. Martin attendance district are largely unavailable and if found, would likely be cost prohibitive. A site for the proposed project would require a minimum of 33.7 acres of developable uplands with good vehicular access and availability of public utilities.

The 33.7 acre requirement is the FEMA approved site area and is in accordance with the State of Mississippi education campus requirements. The following sites were evaluated because they are located within Section 16 land (land designated for school development/educational purposes) and are currently owned by the Jackson County School District. This will result in a cost savings of approximately \$3,000,000 to \$4,000,000 (which

is the estimated cost of a commercial tract of this nature of a suitable size (33.7 acres) as required by FEMA and the State of Mississippi. Another advantage of these sites is the creation of one centralized St. Martin campus, resulting in significant transportation efficiencies that would benefit the Jackson County School District for the life of the facilities.

- **Alternative 1: No Action Alternative**

Under the No Action alternative, FEMA would not fund the proposed project and no new school would be constructed. Students of St. Martin Upper Elementary and St. Martin Middle School would remain at their current locations in temporary portable classrooms. This would result in further disruption of the Jackson County School System, and additional personal hardships for students and school staff.

- **Alternative 2: Construction of a new St. Martin High School on Site Option 2 (Proposed Alternative)**

Site Option 2, an approximately 40-acre site, is located on the north east side of the campus access road Yellow Jacket Boulevard, north of the existing St. Martin High School. The location of Site Option 1 is provided in Appendix A of this report. This site was selected for evaluation based on its proximity to the access road and its apparent high composition of uplands. This site offers limited logistical advantages and would require construction of independent parking and campus loop roads. The site is characterized by the presence of hydric soils and a drainage way that will likely be classified as wetlands. However, identified uplands also exist in sufficient quantity to allow construction of the project. Site Option 1 is outside the Advisory Base Flood Elevation (ABFE).

- **Alternative 3: Construction of a new St. Martin High School on Site Option 3**

Site Option 3, an approximately 44-acre site located at the southern boundary of the 16th Section parcel along Yellow Jacket Boulevard and adjacent to the existing St. Martin High School, was also considered for the project. The location of Site Option 3 is provided in Appendix A of this report. Site Option 3 is already developed and is improved with six baseball fields, three softball fields and two football fields. This site offers the same logistical advantages of Site 1 including location of existing site utilities and walking distance to existing parking and athletic fields to be reutilized. This site would effectively be an extension of the existing campus. However, construction on this site would require the relocation of the existing athletic fields in this area which has been determined to be cost prohibitive.

- **Alternative 4: Construction of a new St. Martin High School on Site Option 1**

Site Option 1, an approximately 40-acre site located northeast of the existing St. Martin High School on Section 16 Land was considered for the project. The location of Site Option 1 is provided in Appendix A of this report. Site option 1 was selected for evaluation due to its good elevation and its adjacency to the existing high school facility. This site presents numerous logistical advantages due to the location of existing site utilities, walking distance to existing parking and athletic fields that would be reutilized. This location would effectively be an extension of the existing campus. A wetland determination indicated that the entirety of Site 1 is high quality pine savanna habitat and contains a high percentage of jurisdictional wetlands, which would not likely be approved for pre-construction filling by federal environmental regulatory agencies.

3.0 AFFECTED ENVIRONMENTS AND POTENTIAL IMPACTS OF THE ALTERNATIVES CONSIDERED

The proposed project site consists of an approximately 40-acre tract of currently undeveloped piney woods located on the north side of St. Martin High School, adjacent to Yellow Jacket Boulevard, near the intersection with Nix Road. It lies within a partially developed but predominately residential area in Western Jackson County, to the north of the city of Ocean Springs, Mississippi. This property is located within Section 16 land (land designated for school development/educational purposes) and is currently owned by the Jackson County School District.

The environmental review process for the Proposed Action included several field reconnaissance site visits, as well as background research and regulatory agency consultation. Field investigations included a Phase I environmental site assessment, a wetlands determination, a threatened and endangered species survey, a cultural resources survey, and a traffic study. Background research included a review of wetland maps, census statistics, FEMA floodplain maps, environmental regulatory records databases, archaeological and historic structures databases, threatened and endangered species information, soil surveys, historic aerial photographs, and other available information. Sections 3.0 through 3.12 below discuss the results of the environmental review process, including the appropriate investigation, coordination and consultation with regulatory agencies. When applicable, appropriate mitigation measures that would reduce any potential adverse effects are summarized.

Affected Environments

3.1 Geology, Seismicity and Soils

According to the Geologic Map of Mississippi (Alvin Bicker, 1969), the surficial soils at the site have been generally mapped as undifferentiated Holocene coastal deposits, consisting of sand, loam, gravel and clay.

Because the proposed project involves the construction of a new building, Executive Order 12699, Seismic Safety of Federal and Federally Assisted or Regulated New Building Construction, applies to the proposed project. According to the National Seismic Hazard Mapping Project, there is currently a low probability of seismic activity within the project area (USGS 2003).

According to information obtained from the Jackson County Soil and Water Conservation District, the principal surficial soil units of the subject property are classified as the Vancleave and the Escambia very fine sandy loam, and the Smithton loam. The Vancleave and Escambia consist of fine to very fine grained sands and silty loam sub-units mostly found along upland flats, but also encountered along peripheral drainage ways. The Escambia units typically have slopes between 0 to 2 percent, while the Vancleave units range between 2 to 5 percent. The Smithton loam, which appears to be mostly encountered along the eastern section of the subject property, is a very fine grained sedimentary sequence that is occasionally flooded. This soil unit is classified as hydric soil with slope typically ranging between 0 to 1 percent. A soils map is included as Figure 5 in Appendix A.

Alternative 1-No Action Alternative

Normal occurrences of soil erosion would be expected to occur if the site is not developed. The site is not located within a 100-year floodplain and is not subject to flooding, due to its

elevation and topography.

Alternatives 2, 3 and 4: Construction of a new St. Martin High School

Area soils would likely be disturbed during construction. Soil loss would occur directly from disturbance or indirectly via wind or water. Best management practices will be developed and implemented, such as implementing an erosion and sedimentation control plan using silt fences or hay bales, revegetating disturbed soils, and maintaining site soil stockpiles, to prevent soils from eroding and dispersing off-site.

Implementation of appropriate Best Management Practices (BMPs) would be required at the construction locations. BMPs include, but are not limited to; the installation of silt fences and revegetating bare soils to minimize erosion. The proposed project site does not contain soils classified as prime or unique farmland.

Any vegetation that is planted as part of the demolition BMPs or that establishes naturally will provide soil stabilization; thereby reducing soil erosion.

3.2-Land Use

The project site is located on vacant undeveloped Section 16 land, which is set aside for educational purposes

Alternative 1-No Action Alternative

No Impact

Alternative 2, 3 and 4: Construction of a new St. Martin High School

No Impact

3.3-Zoning

The project site is located on vacant undeveloped Section 16 land, which is set aside for educational purposes. It is zoned as R-1, according to the Jackson County Zoning Department.

Alternative 1-No Action Alternative

No Impact

Alternative 2, 3 and 4: Construction of a new St. Martin High School

No Impact

3.4 Floodplain Encroachment

Executive Order (EO) 11988 (Floodplain Management) requires Federal agencies to take action to minimize occupancy and modification of the floodplain. Specifically, EO 11988 prohibits Federal agencies from funding construction in the 100-year floodplain unless there are no practicable alternatives. FEMA's regulations for complying with EO 11988 are promulgated in 44 CFR Part 9. FEMA uses Flood Insurance Rate Maps (FIRMs) to identify the regulatory 100-year floodplain for the National Flood Insurance Program (NFIP).

Alternative 1-No Action Alternative

No Impact

Alternative 2, 3 and 4: Construction of a new St. Martin High School

Information provided by Mr. Ben Taylor of the Jackson County Floodplain Administration indicates that the site is located in Zone C which is not within a 100-year floodplain per the FEMA Flood Insurance Rate Map Number 285256 0160D dated 9/8/87. The Map depicting the property within Floodzone C is included as Figure 6 in Appendix A of this report.

3.5 Traffic Circulation and Parking Access to Residential and Commercial Areas to Traffic Patterns

The Mississippi Department of Transportation (MDOT) is responsible for the design, construction and maintenance of the State of Mississippi's Highway System as well as the portion of federal interstate highways within Mississippi's boundaries. Arterials, connectors, rural roads, and local roads are constructed and maintained by county or city governments. A traffic analysis report was conducted by Neel-Schaffer for the proposed project site. The traffic analysis report is included under separate cover.

The recommendations and conclusions of the traffic analysis report include three traffic related issues:

1. The intersection of Old Fort Bayou Road with Yellow Jacket Boulevard and Bayou Place has sight distance limitations due to high angle approaches that stops the majority of traffic on the minor approaches. Reconstruction of the intersection is recommended to significantly improve the intersection safety and reduce traffic delays.
2. The southbound left turn on Hwy. 609 at Old Fort Bayou Road conflicts with

the Reserve Apts. Northbound left turn and the Dollar General traffic. Reconstruction of the alignment as a long term project is recommended to alleviate the queuing problem that blocks through traffic on Hwy. 609.

3. The existing roadway width of Old Fort Bayou Road (20 ft.) between Hwy. 609 and Yellow Jacket Blvd. is too narrow for the existing traffic volumes and vehicle types. The roadway width is recommended to be widened to provide 12 ft. lanes and a 4 ft. (minimum) shoulders between Yellow Jacket Blvd. and Hwy. 609.

Alternative 1-No Action Alternative

No Impact

Alternatives 2, 3 and 4: Construction of a new St. Martin High School

The proposed new St. Martin High will be accessed by Yellow Jacket Boulevard, which is the existing school access road for the existing high school as well as for the temporary portable classroom buildings occupied by St. Martin Upper Elementary and St. Martin Middle School. A Traffic Analysis Study was conducted by Neel-Schaffer and is included in under separate cover.

Construction vehicles and equipment would be stored on-site during project construction and appropriate signage would be posted on affected roadways.

3.6 Public Health and Safety

OSHA is the Occupational Safety and Health Act, which insures that “no employee will suffer material impairment of health or functional capacity” as a result of their work. The general contractor will be responsible for ensuring that all construction activities would be performed using qualified personnel and in accordance with the standards specified in OSHA regulations. Placement of appropriate signage and barriers should be in place prior to construction activities to alert pedestrians and motorists of project activities.

EO13045 is Executive Order 13045, Reduce Environmental Health and Safety Risks to Children, which addresses potential health and safety risks to children. It does not require risk communication per se.

The general contractor for the construction project will contract for all work including all work pertaining to site clearing and all construction inclusive to complete the new facility. The Jackson County School District is responsible for providing School Reserve Officers (SROs) at the facility to provide security. Fire alarms, extinguishers, sprinkler systems, and security cameras will provide safety for the students and staff at the facility.

CERCLA (commonly referred to as Superfund) is the Comprehensive Environmental Response, Compensation, and Liability Act. It requires community relations components during the assessment of hazardous substances at inactive waste sites. Key communication pieces include a community relations plan, public access to the complete administrative record, an information repository, and advertisement of public involvement opportunities. Health and ecological impact may be determined requiring worker and public notification. Emergency removal actions may be required.

RCRA is the Resource Conservation and Recovery Act, which establishes regulatory standards for the generation, transportation, storage, treatment, and disposal of hazardous wastes. In regulatory terms, a RCRA hazardous waste is a waste that appears on one of the four hazardous wastes lists (F-list, K-list, P-list, or U-list), or exhibits at least one of four

characteristics—ignitability, corrosivity, reactivity, or toxicity. Hazardous waste is regulated under the Resource Conservation and Recovery Act (RCRA) Subtitle C.

Hazardous material means as any material that, because of its quantity, concentration, or physical and chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or environment.

An environmental database review, historic aerial photograph review, a telephone interview with former parcel occupant and site reconnaissance was conducted by Covington and Associates personnel in January 2007. The site visit and records review revealed no evidence of *recognized environmental conditions* on the subject property. The records database report is included under separate cover to this report.

Alternative 1-No Action Alternative

No Impact

Alternatives 2, 3 and 4: Construction of a new St. Martin High School

No Impact

There will be no impact from the proposed action with respect to the presence of hazardous materials and potential exposure, because no hazardous or toxic materials or wastes have been identified at the site location. Phase I Environmental Site Assessments (ESAs) were conducted by Covington and Associates in January 2007 for both Site Option 2 and Site Option 3, and the assessments has revealed no evidence of *recognized environmental conditions* on the subject property. A Phase I ESA was not conducted on Site Option 4 due to the preponderance of wetland soils on the site. The ESAs included a site visit and regulatory database search, conducted by EDR. These ESAs did not indicate that the Site

Options 2 and 3 were CERCLA sites or RCRA sites, nor the presence of hazardous or toxic materials or wastes on those sites. The Phase 1 ESA report for Site Option 2 (proposed alternative) is included under separate cover to this report.

3.7 Socioeconomic Issues

EO12898 is the Executive Order 12898 Environmental Justice in Minority Populations. This requires federal agencies, departments, and often their contractors to consider any potentially disproportionate human health or environmental risks their activities, policies, or programs may pose to minority or low-income populations.

Based on U.S. Census Bureau information for the year 2000, the percent populations of zip code 39532 (which is the zip code for the destroyed St. Martin Upper Elementary School and St. Martin Middle School) are 85.8% White, 7.2% Black or African American, 4.3% Asian, 2.2% Hispanic or Latino, and 0.4% American Indian or Alaska Native. The median household income (in 1999 dollars) for the area is \$41,411 and 7.1 % of families are below the poverty level.

For the zip code 39564 (the zip code including the new proposed St. Martin High School) the percent populations are 87.9% White, 6.6% Black or African American, 3% Asian, 2.3% Hispanic or Latino, and 0.4% American Indian or Alaska Native. The median household income (in 1999 dollars) for the area is \$47,133 and 3.9 % of families are below the poverty level.

Alternative 1-No Action Alternative

Although there is no requirement for compliance with EO 12898 when there are no federal

actions, low-income and minority families and children would be adversely affected if the new school were not constructed, due to insufficient permanent educational facilities as well as lack of the new 361 shelter facility that the school would provide in the event of a natural disaster.

Alternatives 2, 3 and 4: Construction of a new St. Martin High School

The proposed action will benefit the community by providing the upper elementary and middle school students with permanent educational facilities to replace temporary trailers, and by providing high school students with a new state-of-the art educational facility. The construction of the new St. Martin High School Facility will be designed in accordance of the “FEMA 361 Design and Construction Guidance for Community Shelters” document. The facility, inclusive of these requirements will consist of 93,748 square feet of hardened construction designed to resist 200 mph wind speeds. By FEMA guidelines of 20 square feet per person, this facility will benefit all citizens of Jackson County by safely housing 2,556 occupants during the event of a natural disaster. The FEMA 361 Shelter requirements also call for the inclusion of a hardened generator area and provisions for back-up for water and sewer utilities. The local community would be the least likely to successfully implement a long-distance evacuation plan to another state and therefore would benefit from the construction of a FEMA 361 community shelter at this location.

3.8 Air Quality

Under the Clean Air Act, the U.S. Environmental Protection Agency (EPA) establishes primary and secondary air quality standards. Primary air quality standards protect the public health, including the health of “sensitive populations, such as people with asthma, children, and older adults.” Secondary air quality standards protect public welfare by promoting ecosystems health, preventing decreased visibility, and damage to crops and buildings. EPA has set national ambient air quality standards (NAAQS) for six of the following criteria

pollutants; ozone (O₃), particulate matter (PM_{2.5} and 10), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), and lead (Pb). According to the MDEQ, the entire state of Mississippi is classified as in attainment, meaning criteria air pollutants do not exceed the NAAQS.

Alternative 1-No Action Alternative

No Impact

Alternatives 2, 3 and 4: Construction of a new St. Martin High School on Site Option 2

Increase in vehicle exhaust emissions and dust is anticipated during construction. Federal and state air attainment levels would not be exceeded. Best management practices would be developed and implemented to cover and/or wet area soils during construction to minimize dust. This project site is located in an attainment area. There will be negligible impacts to air quality.

3.9 Noise

Sound is most commonly measured in decibels (dB) on the A-weighted scale, which is 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.

Noise, defined herein as undesirable sound, is federally regulated by the Noise Control Act of 1972 (NCA). Although the NCA gives the EPA authority to prepare guidelines for acceptable

ambient noise levels, it only charges those federal agencies that operate noise-producing facilities or equipment to implement noise standards. EPA guidelines, and those of many other federal agencies, state that outdoor sound levels in excess of 55 dB DNL are “normally unacceptable” for noise-sensitive land uses such as residences, schools, or hospitals.

Alternative 1-No Action Alternative

No Impact

Alternatives 2, 3 and 4: Construction of a new St. Martin High School

The proposed project site consists mainly of rural forested land. There are no noise-sensitive areas within a 4-mile radius of the proposed project site. According to Mr. Ben Taylor of the Jackson County offices, there are currently no noise laws, regulations, or ordinances in effect for Jackson County.

The impact of increased noise is considered to be temporal and spatially distributed and minor in nature.

Construction noise impacts would be short-term and limited to the duration of construction activities. The vehicles from school use would increase the level of vehicular noise in the area during school transportation peak times in the morning and afternoon. There is no noise ordinance in effect for the project location.

3.10 Public Services and Utilities

Water and sewer services currently provided for this area by the West Jackson County Utility District. Natural gas service is provided to the area by Center Point Energy, and electricity is supplied by Singing River Electric. Fire protection is provided by the Fort Bayou Volunteer Fire Department and police protection is provided by the Jackson County Sheriff Department.

Alternative 1-No Action Alternative

No Impact

Alternatives 2, 3 and 4: Construction of a new St. Martin High School

The water and sewer for the school will tie into services currently provided for this area by the West Jackson County Utility District. Natural gas service is provided to the area by Center Point Energy, and electricity is supplied by Singing River Electric. Fire protection is provided by the Fort Bayou Volunteer Fire Department and police protection is provided by the Jackson County Sheriff Department.

3.11 Water Resources/Water Quality

The Clean Water Act (CWA), as amended in 1977, established the basic framework for regulating discharges of pollutants into the water of the United States. The proposed project site is located above the coastal lowlands aquifer system. Recharge of the aquifer in the vicinity of the proposed project site occurs in areas of higher elevations because water flows southwest toward the Gulf of Mexico. Dissolved solids, such as salinity, increase as the

velocity of the water decreases approaching the sea. The well that serves the existing St. Martin High school (south of the project location) is approximately 765 feet deep and is completed in the lower Graham Ferry aquifer. The well is rated to produce 600 gallons per minute, according to Mr. Tommy Fairfield, general manager for the West Jackson County Utility District, owner of the well. Mr. Fairfield indicated that the Mississippi Public Water System ID # is 0300161, and that the well is well is tied into a back-up water system which includes nineteen wells owned by the District. Furthermore, the on-site well is equipped with a 150 kw generator to provide power in case of an emergency. The existing St. Martin High School also has an on-site well which was drilled when the high school was built (approximately eleven years ago) but that well is used for irrigation purposes only at this time.

Based on the local topography, the northern portion of the site drains towards the west and the southern portion of the site drains toward the south, into topographic lows that drain into Bayou Talla to the southwest of the subject property. There is a shallow ditch adjacent to the eastern side of Yellow Jacket Boulevard.

Alternative 1-No Action Alternative

No Impact

Alternatives 2, 3 and 4: Construction of a new St. Martin High School

There will be minimal impacts to the groundwater due to slight increased demand on the potable aquifer at this location.

There are no Wild and Scenic Rivers located on or adjacent to the site. There is the potential

for localized increase in sedimentation in local drainage pathways during construction. Best management practices will be developed and implemented, such as implementing an erosion and sedimentation control plan using silt fences or hay bales to reduce sedimentation. If fill is stored on site, the contractor will be required to cover it appropriately. The storm water drainage system will consist of both sheet and sub-surface drainage. The system will be designed so that pre and post storm water run-off will equal.

There will be minimal impacts to surface water due to possible slightly increased runoff during construction to Bayou Talla.

3.12 Biological Resources

3.12.1 EO 11990 ** (Wetlands)

The basic requirement of E.O. 11990 is that a Federal agency avoid construction or management practices that would adversely affect wetlands unless that agency finds that (1) there is no practicable alternative, and (2) the proposed action includes all practicable measures to minimize harm to the wetlands.

Alternative 1-No Action Alternative

No Impact

Alternative 2: Construction of a new St. Martin High School on Site Option 2 (Proposed Alternative)

CAC is currently coordinating the necessary Joint Application and Notification with the US Army Corps of Engineers, Mobile District, Mississippi Department of Marine Resources (DMR), and Mississippi Department of Environmental Quality (DEQ). At current, the project proposes 2.31 acres of wetland impacts. The project is consistent with the DMR Coastal Zone Management Act by the nature of its size, impacts, and specific location. Approximately 2.3 acres will be impacted based on the most recent building design. A wetland permit application was submitted in September 6, 2007 and is included under separate cover to this report. CAC received US Army Corps of Engineers Public Notice on September 27, 2007 and is included under separate cover to this report.

Alternative 3: Construction of a new St. Martin High School on Site Option 3

No wetlands delineation was conducted on Site Option 3, an approximately 44-acre site located at the southern boundary of the 16th Section parcel along Yellow Jacket Boulevard and adjacent to the existing St. Martin High School. This site has been cleared and developed with six baseball fields, three softball fields and two football fields. Construction on this site would not result in impact to wetlands.

Alternative 4: Construction of a new St. Martin High School on Site Option 1

A wetlands determination conducted on Site Option 1, an approximately 40-acre site located northeast of the existing St. Martin High School on Section 16 Land, indicated that the entirety of Site 1 is high quality pine savanna habitat and contains a high percentage of jurisdictional wetlands, which would not likely be approved for pre-construction filling by federal environmental regulatory agencies. Construction on this site would result in a major impact to wetlands.

3.12.2 Threatened or Endangered Species (animal, plant, aquatic)

Affected Environment

The Endangered Species Act forbids federal agencies from authorizing, funding or carrying out actions which may “jeopardize the continued existence of” endangered or threatened species (Section 7(a) (2)). It forbids any government agency, corporation, or citizen from taking (i.e. harming, harassing, or killing) endangered animals without a permit. Once a species is listed as threatened or endangered, the ESA also requires that “critical habitat” be designated for that species, including areas necessary to recover the species (Section 3(5) (A)). Federal agencies are forbidden from authorizing, funding, or carrying out any action which “destroys or adversely modifies” critical habitat (Section 7(a) (2)).

The U.S. Fish and Wildlife Service lists 18 federally protected species for Jackson County, Mississippi. CAC has evaluated the seventeen listed species and objectively categorized them into the following groups based on species life history and habitat cover types found on the property.

Possible:

T - Bald eagle Haliaeetus leucocephalus

T- Yellow-blotched map turtle Graptemys flavimaculata

E- Mississippi Sandhill Crane Grus Canadensis pulla

E - Louisiana quillwort Isoetes louisianensis

E- Peregrine falcon Falco Peregrinus

Not Likely due to lack of Habitat:

T- Gulf Sturgeon Acipenser oxyrinchus desotoi

E - Red-cockaded woodpecker Picoides borealis

E - Florida Panther Puma concolor coryi

E- Least tern Sterna antillarum
PE – Mississippi gopher frog Rana sevosa
T - Louisiana black bear Ursus a. luteolus
T - Gopher tortoise Gopherus polyphemus
E – Chaffseed Schwalbea americana

Not Possible:

E - Kemp's ridley Lepidochelys kempii
E – Brown Pelican Pelecanus occidentalis
T - Green turtle Chelonia mydas
T - Loggerhead turtle Caretta caretta
T - Gulf sturgeon, Acipenser oxyrhynchus desotoi

Alternative 1-No Action Alternative

No Impact

Alternatives 2, 3 and 4: Construction of a new St. Martin High School

Coordination with the Mississippi Natural Heritage Program has revealed that no protected species have been previously recorded within a 2-mile radius of the project area attachment). It is the opinion of CAC's staff biologist that development activities associated with this property would not have any adverse effects on any listed species. The wetland habitat is somewhat sensitive to many species and should be protected as much as possible.

The Threatened and Endangered Species survey was conducted during numerous pedestrian surveys of the property at different levels and at different times during November 2006- March 2007. None of the listed species for Jackson County were recorded during the survey. Concurrence from the Mississippi Museum of Natural Science and U.S. Wildlife Service is

included in Appendix B. The Threatened and Endangered Species survey report is available under separate cover to this report.

Potential minimal temporary adverse impacts (displacement) to non-federally protected urban wildlife species. No threatened or endangered species were recorded for the project area.

3.13 Cultural Resources

3.13.1 Historic Properties

Section 106 of the National Historic Preservation Act (NHPA) granted legal status to historic preservation in Federal planning, decision making, and project execution. Section 106 requires all Federal agencies to take into account the effects of their actions on historic properties, and provide the Advisory Council of Historic Preservation with a reasonable opportunity to comment on those actions and the manner in which Federal agencies are taking historic properties into account in their decisions.

Alternative 1-No Action Alternative

No Impact

Alternatives 2 and 3: Construction of a new St. Martin High School on Site Option 2 and Site Option 3

A cultural resources survey was conducted for the project by Ms. Harriet L. Richardson Seacat and Mr. Nathan Durbin, Center for Archeological Studies, University of South Alabama. The physiographic characteristics of the tract suggest that prehistoric or historic sites could be found. Because of the probability that a site might be found, a survey strategy was

designed to cover the tract systematically. The field studies were conducted during the weeks of November 26, 2006 and January 1, 2007. A final report was submitted on January 11, 2007. The report is available under separate cover to this report. Alternative 2 (Proposed Alternative) is identified as Project Tract 1 in the report. Alternative 3 is identified as Project Tract 2 in the report.

On January 8, 2007, David Morgan searched the Mississippi archaeological site maps for cultural resources in the project tract vicinity. No archaeological sites have been previously recorded within 0.75 miles of the project tract. Archaeological surveys in this vicinity include one performed by Greenwell in 1984, and two others by Lauro in 1999 and 2001 (MDAH 2007). Neither archaeologist found any cultural resources during investigations on the subject property.

The investigation found no significant artifacts during the pedestrian survey or shovel testing on the subject property. No standing structures over 50 years of age currently exist within the survey tract. The report concluded that in the absence of any significant archaeological recovery from the project tract, it is recommended that no further cultural monitoring or mitigation be required.

CAC submitted a letter to Mr. Jim Woodrick of the Mississippi Department of Archives and History (MDAH), the MDAH response is contained in Appendix B. The MDAH listed no issues on the letter of concurrence.

Alternative 4: Construction of a new St. Martin High School on Site Option 1

No cultural resources survey was conducted on Site Option 1; therefore, the potential impacts for this alternative are unknown.

3.13.2 Archaeological Resources

Alternative 1-No Action Alternative

No Impact

Alternatives 2 and 3: Construction of a new St. Martin High School

A cultural resources survey was conducted for the project by Ms. Harriet L. Richardson Seacat and Mr. Nathan Durbin, Center for Archeological Studies, University of South Alabama. The physiographic characteristics of the tract suggest that prehistoric or historic sites could be found. Because of the probability that a site might be found, a survey strategy was designed to cover the tract systematically. The field studies were conducted during the weeks of November 26, 2006 and January 1, 2007. A final report was submitted on January 11, 2007. The report is available under separate cover with this report. Alternative 2 (Proposed Alternative) is identified as Project Tract 1 in the cultural resources report. Alternative 3 is identified as Project Tract 2 in the cultural resources report.

On January 8, 2007, David Morgan searched the Mississippi archaeological site maps for cultural resources in the project tract vicinity. No archaeological sites have been previously recorded within 0.75 miles of the project tract. Archaeological surveys in this vicinity include one performed by Greenwell in 1984, and two others by Lauro in 1999 and 2001 (MDAH 2007). Neither archaeologist found any cultural resources during investigations on the subject property.

The investigation found no significant artifacts during the pedestrian survey or shovel testing on the subject property. No standing structures over 50 years of age currently exist within the survey tract. The report concluded that in the absence of any significant archaeological recovery from the project tract, it is recommended that no further cultural monitoring or

mitigation be required.

CAC submitted a letter to Mr. Jim Woodrick of the Mississippi Department of Archives and History (MDAH). The MDAH letter of concurrence is included in Appendix B.

3.14 Cumulative Impacts

Cumulative impacts are those effects on the environment that result from the incremental effect of the proposed action (Option 2-Construction of new St. Martin High School) when added to the past, present, and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7). In accordance with NEPA and to the extent reasonable and practical, this EA considered the combined effect of the proposed action alternative- Option 2 and other actions occurring or proposed in the vicinity of the proposed project site.

The entire Mississippi Gulf Coast is undergoing continued recovery efforts after Hurricane Katrina caused extensive damages. The recovery efforts in Jackson County include demolition, re-construction and new construction. These projects and the proposed project alternative may have a cumulative temporary impact to air quality, surface water drainage, noise and traffic flow. No other cumulative effects are anticipated.

Alternative 1-No Action Alternative

No Impact

Alternatives 2, 3 and 4:

No long term impact anticipated. There will be some short-term, temporary impacts to air quality, surface water drainage, noise and traffic flow during construction activities.

3.15 Agency Coordination and Permits

All necessary permits and coordination with governing agencies will be the responsibility of Guild-Hardy and/or the contractor selected for site construction. All construction and required regulatory permits will be maintained and posted at a kiosk at the construction site.

Building permits will be obtained from the Jackson County Code Office, and permits to fill wetlands will be obtained from the U.S. Army Corps of Engineers. An N.P.D.E.S. storm water discharge permit will be obtained from the Mississippi Department of Environmental Quality.

The following agencies and organizations were contacted during the preparation of this EA. Letters received to date are included in the Appendix B.

Federal

- U.S. Army Corps of Engineers, Mobile District, Regulatory Division will be contacted through joint application and notification to be submitted on September 5, 2007, in accordance with Section 404 of the Clean Water Act.
- U.S. Environmental Protection Agency, Region 4, Water Management Division will be contacted through the Corps joint application process to be submitted in September 2007, in accordance with Section 404 of the Clean Water Act.

- U.S. Fish and Wildlife Service, Jackson Field Office through the Corps joint application process to be submitted in September 2007, in accordance with Section 404 of the Clean Water Act.
- A letter of concurrence from the office of Mississippi State Senator Trent Lott- June 25, 2007. The letter is included in Appendix B.

State

- Mississippi Department of Archives and History (MDAH) report sent by University of South Alabama. MDAH sent a letter of concurrence and is included in Appendix B of this report.
- Mississippi Department of Environmental Quality, Office of Pollution Control, Environmental Permits Division will be contacted through joint application and notification submitted on September 6, 2007, in accordance with Section 404 of the Clean Water Act.
- Mississippi Department of Marine Resources, Bureau of Wetlands Permitting will be contacted through joint application and notification submitted on September 6, 2007, in accordance with Section 404 of the Clean Water Act.
- Mississippi Department of Transportation, Environmental Division was contacted during the traffic study conducted by Neil Schaffer.
- A letter of concurrence from Mississippi Emergency Management Agency (MEMA) was received on July 6, 2007 and is included in Appendix B.

In accordance with applicable local, state, and federal regulations, the applicant would be responsible for acquiring any necessary permits prior to commencing construction at the proposed project site.

4.0 PUBLIC INVOLVEMENT

The proposed project was discussed during regularly scheduled Jackson County School District Board of Education meetings held on the following dates: 12/12/05; 1/12/06; 1/30/06; 2/13/06; 3/13/06; 4/3/06; 5/1/06; 5/15/06; 6/5/06; 6/26/06; 7/10/06; 8/7/06; 8/28/06; 10/16/06; 11/13/06; 12/11/06; 1/8/07; 1/25/07; 2/12/07; 3/12/07; 4/9/07 6/25/07; 7/09/07; 8/06/07; and 8/27/07.

The proposed project was also discussed with the Jackson County School Board of Education- Building Committee for the New High School on the following dates: 05/17/07; 05/24/07; 06/07/07; 07/12/07; 07/31/07; and 08/15/07.

The proposed action will be publicized during a fifteen-day public comment period. If no substantive comments are received, the Draft EA will become final and this initial Public Notice will also serve as the final Public Notice.

If no substantive comments are received, the Draft EA and FONSI will become final and the initial Public Notice will also serve as the final Public Notice. Substantive comments will be addressed as appropriate in the Final documents.

5.0 LIST OF PREPARERS

Anthony P. Damiano
Covington & Associates Corporation
1636 Popps Ferry Road
Suite M-5
Biloxi, MS 39532
Office Telephone: 228-396-0486

REFERENCES

www.apgea.army.mil/risk/PDF/LawReg.pdf

Environmental Data Resources (EDR), Inc. 2006. EDR Report Number 1814683.2s (dated December 11, 2006)

<http://www.epa.gov/safewater> accessed 1/19/07

Geologic Map of Mississippi, Alvin R. Bicker, Jr., 1969

West Jackson County Utility District, April 25, 2007 telephone interview with Mr. Tommy Fairfield, General Manager.

Jackson County Zoning/Planning/Flood Zone Department, interview with Ben Taylor, Certified Flood Zone Manager, April 23, 2007 regarding flood zone determination per Flood Insurance Rate Map 285256 0160D dated 9/8/87.

Natural Resource Conservation Service (Gulfport Service Center), personal interview with T. Harrington, District Conservationist

U.S. Census Bureau, <http://factfinder.census.gov/servlet/SAFFFacts?>- Accessed 4/24/07.

U.S. Fish and Wildlife Service (USFWS). 2006.

<http://www.jcsd.k12.ms.us>. Accessed 4/25/07.

U.S. Geological Survey (USGS). 2006. *Ground Water Atlas of the United States, Arkansas, Louisiana, Mississippi HA 730-F*. http://capp.water.usgs.gov/gwa/ch_f/F-text3.html. Accessed 12/15/06.

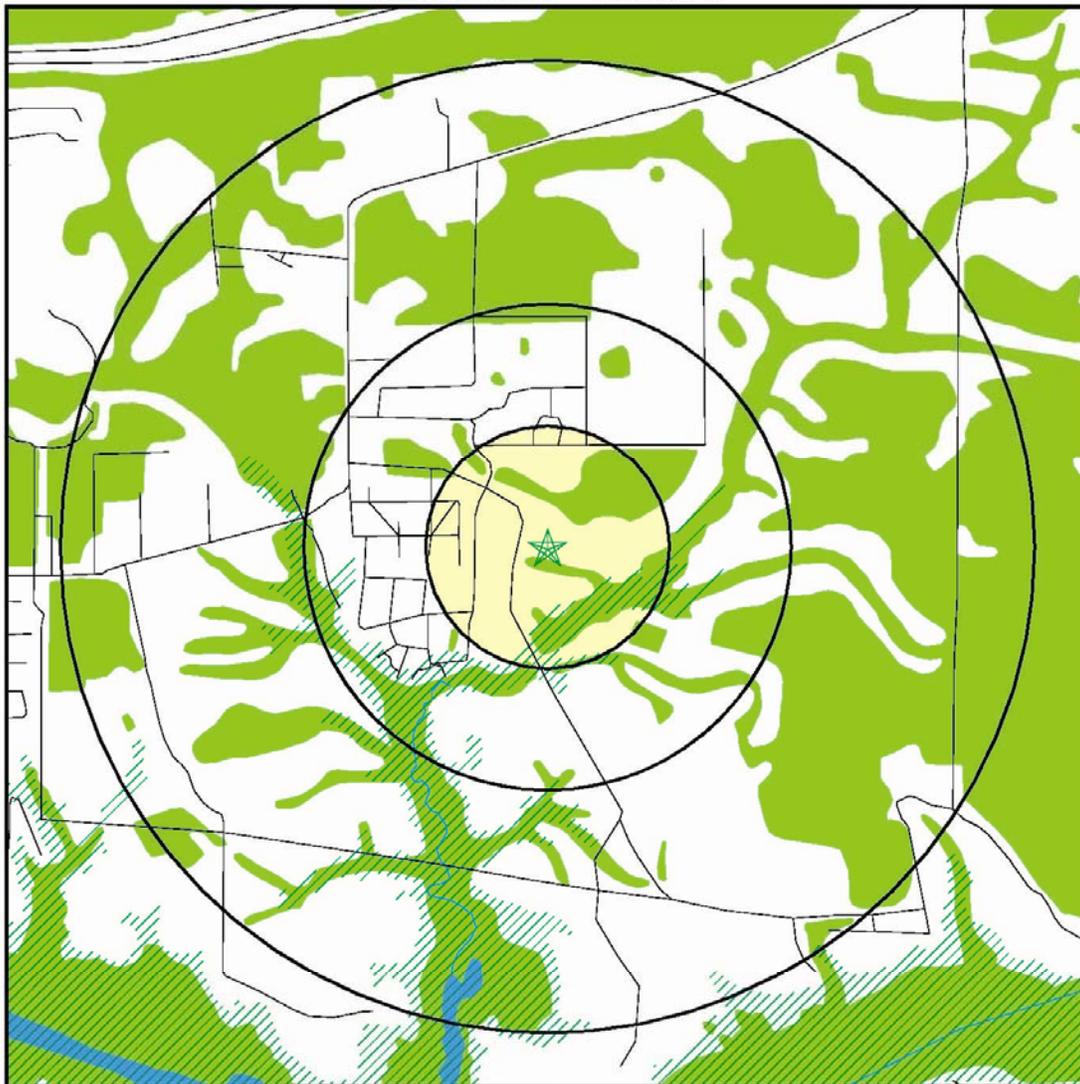
<http://websoilsurvey.nrcs.usda.gov/app/>. Accessed 4/20/2006

USGS. 2006c. <http://quake.wr.usgs.gov/prepare/factsheets/NewMadrid/>. Accessed 12/4/06.

USGS 7.5-Minute Topographic Quadrangle Map for “Ocean Springs, Miss.” (1992), reviewed April 24, 2007.

Appendix A
Figures, Maps and/or Photographs

OVERVIEW MAP - 1814683.2s



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Manufactured Gas Plants
- National Priority List Sites
- Landfill Sites
- Dept. Defense Sites
- Indian Reservations BIA
- ▲ Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone
- National Wetland Inventory

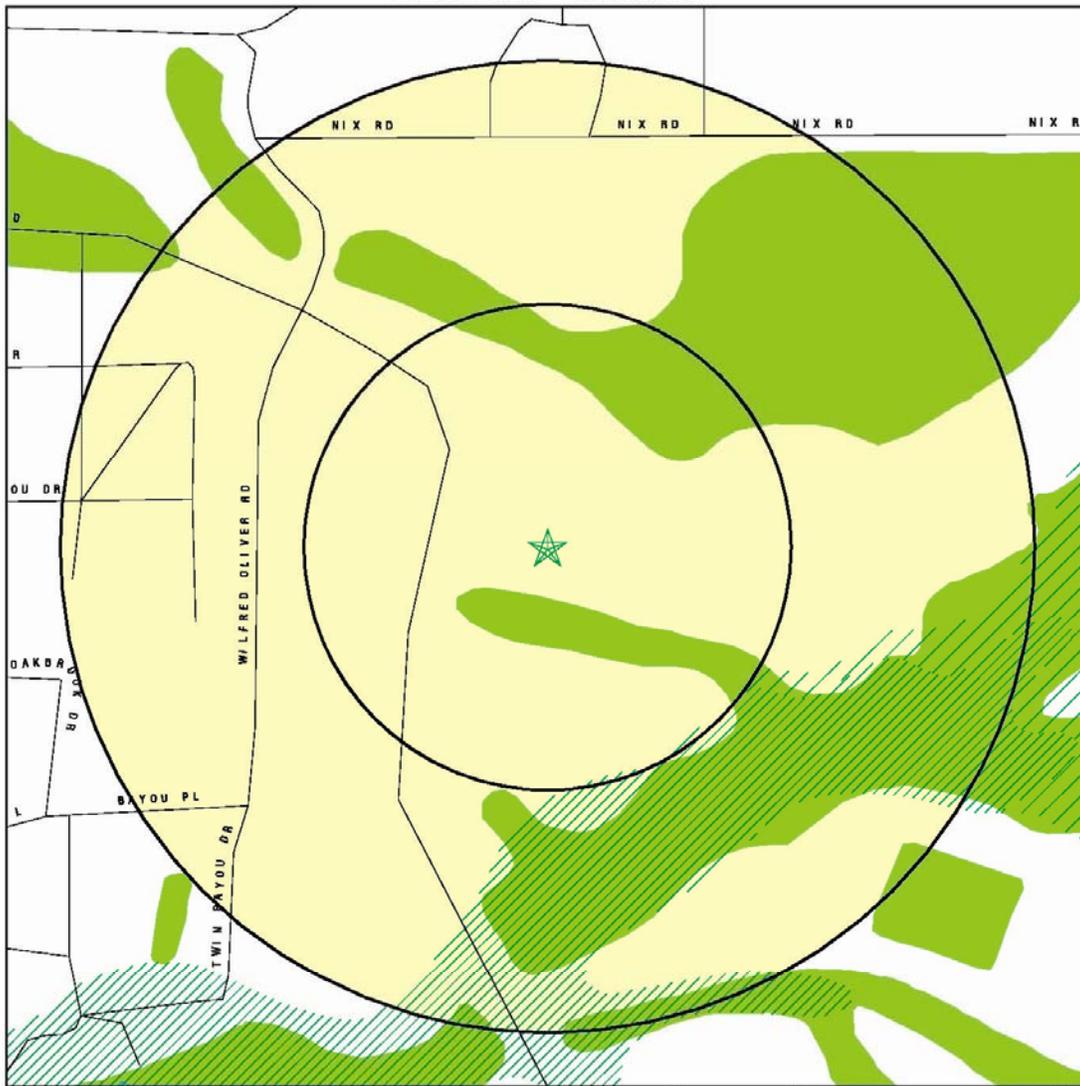
This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

<p>SITE NAME: Jackson County School District ADDRESS: 10800 Yellow Jacket Blvd. Ocean Springs MS 39564 LAT/LONG: 30.4398 / 88.7970</p>	<p>CLIENT: Covington and Associates Corp. CONTACT: Lars Larson INQUIRY #: 1814683.2s DATE: December 11, 2006 1:43 pm</p>
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Proposed Project Location- Option #2
Figure 1

DETAIL MAP - 1814683.2s



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Manufactured Gas Plants
- ⚡ Sensitive Receptors
- 🗑️ National Priority List Sites
- 🗑️ Landfill Sites
- 🗑️ Dept. Defense Sites
- 🇺🇸 Indian Reservations BIA
- 🛢️ Oil & Gas pipelines
- 🌊 100-year flood zone
- 🌊 500-year flood zone
- 🌿 National Wetland Inventory

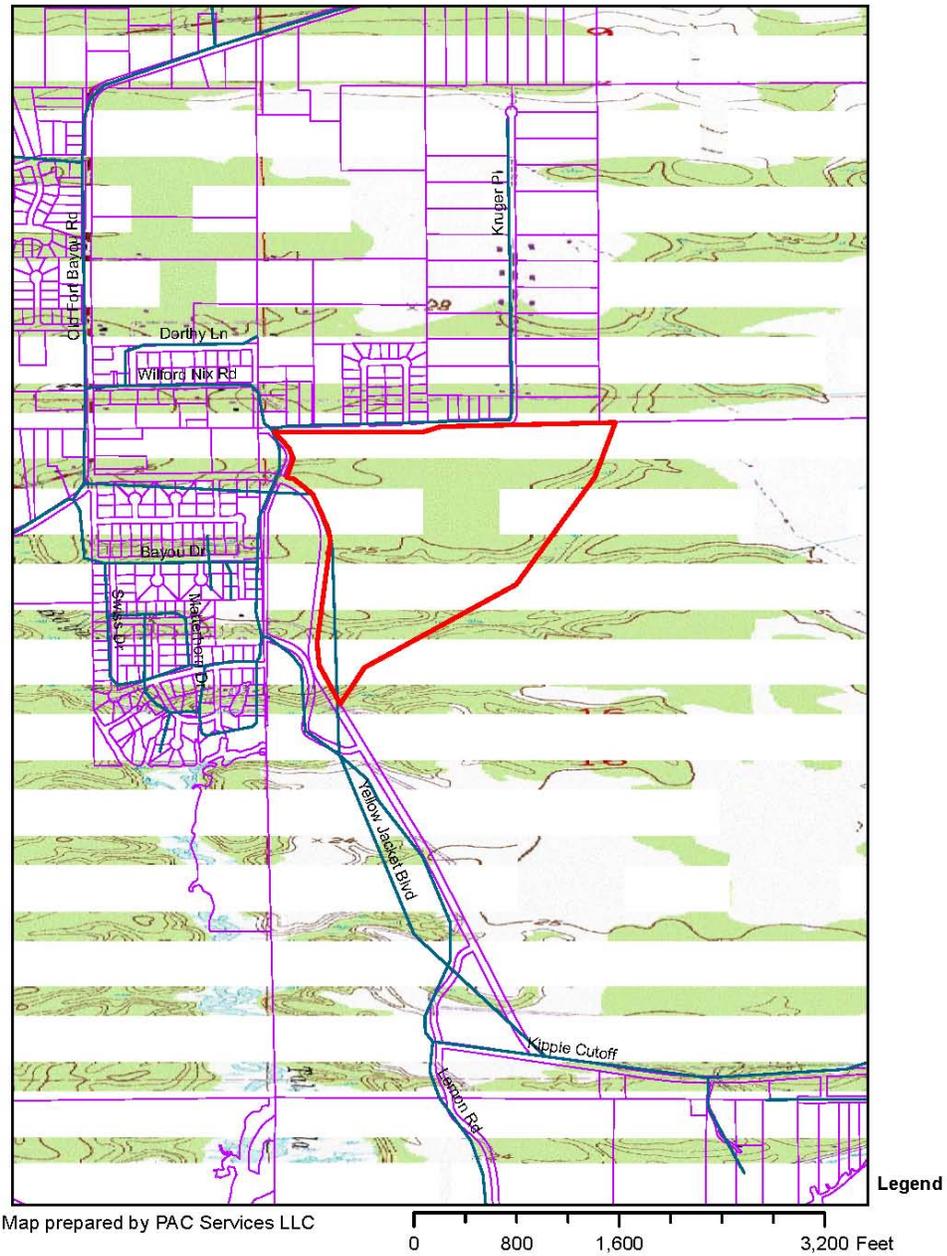
This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

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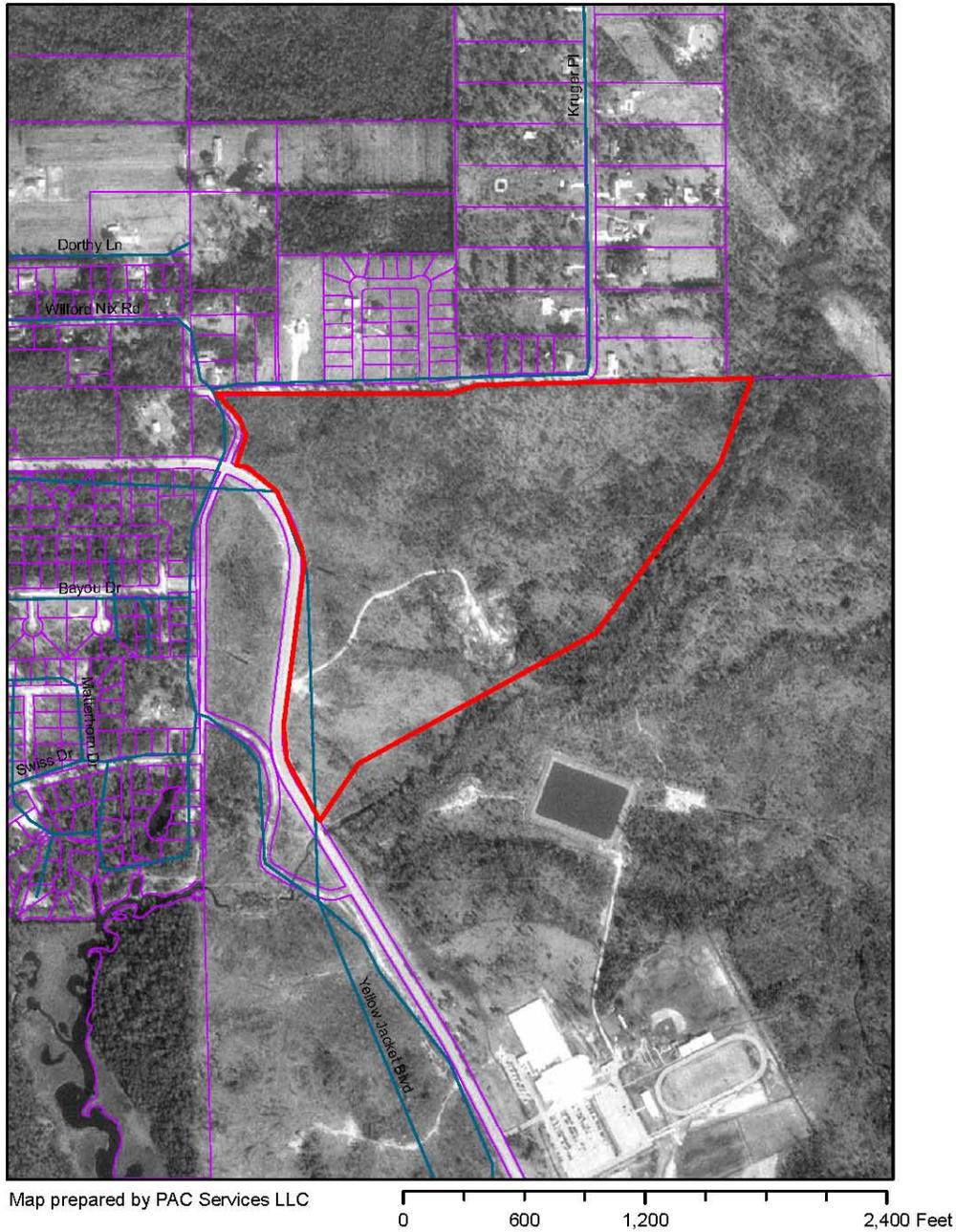
Proposed Project Location- Option #2
Figure 1a

Jackson County School District
Proposed School Site
Section 16 T7S R8W
Jackson County, Mississippi

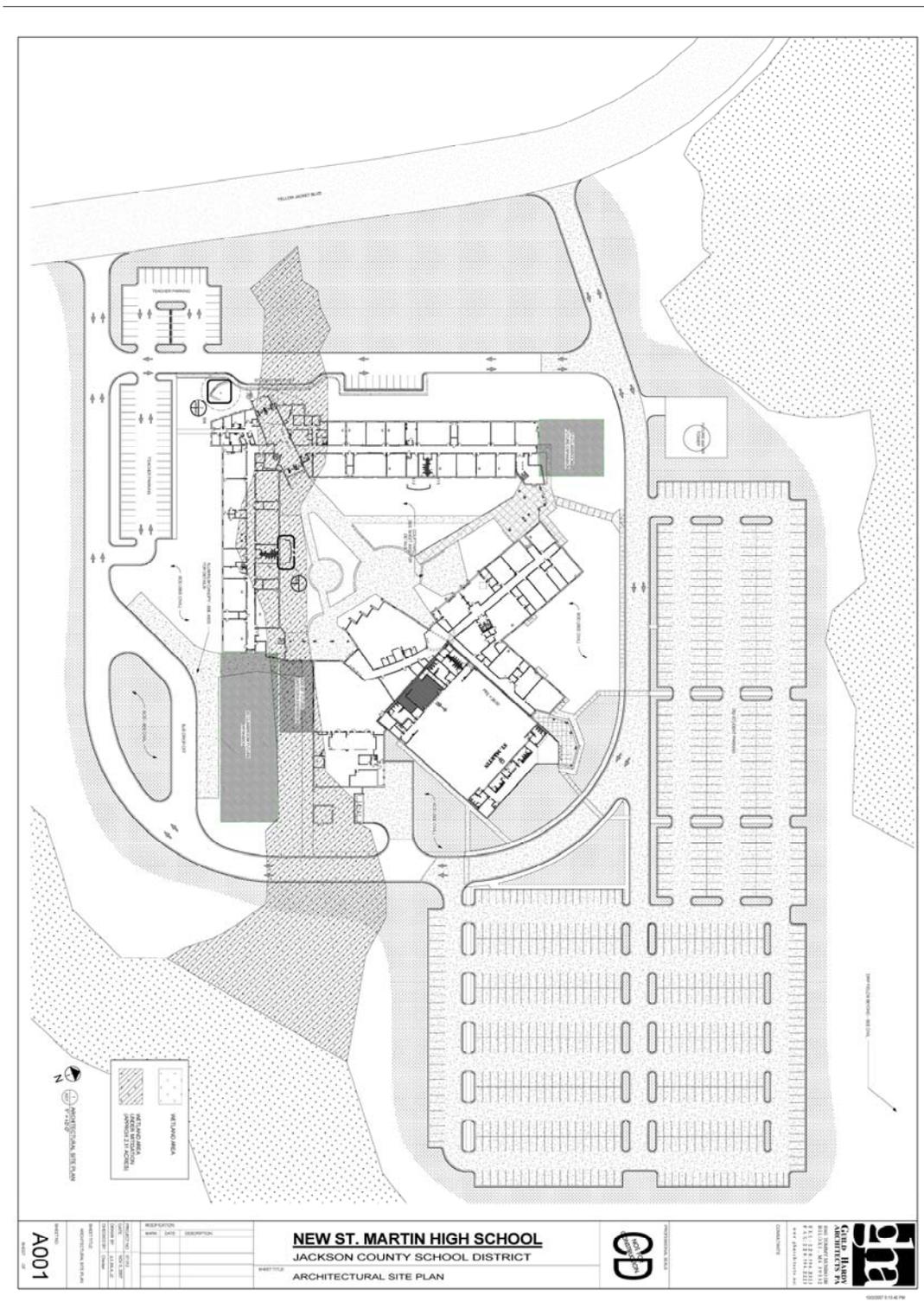


Proposed Project Location- Option #2
USGS Map
Figure 2

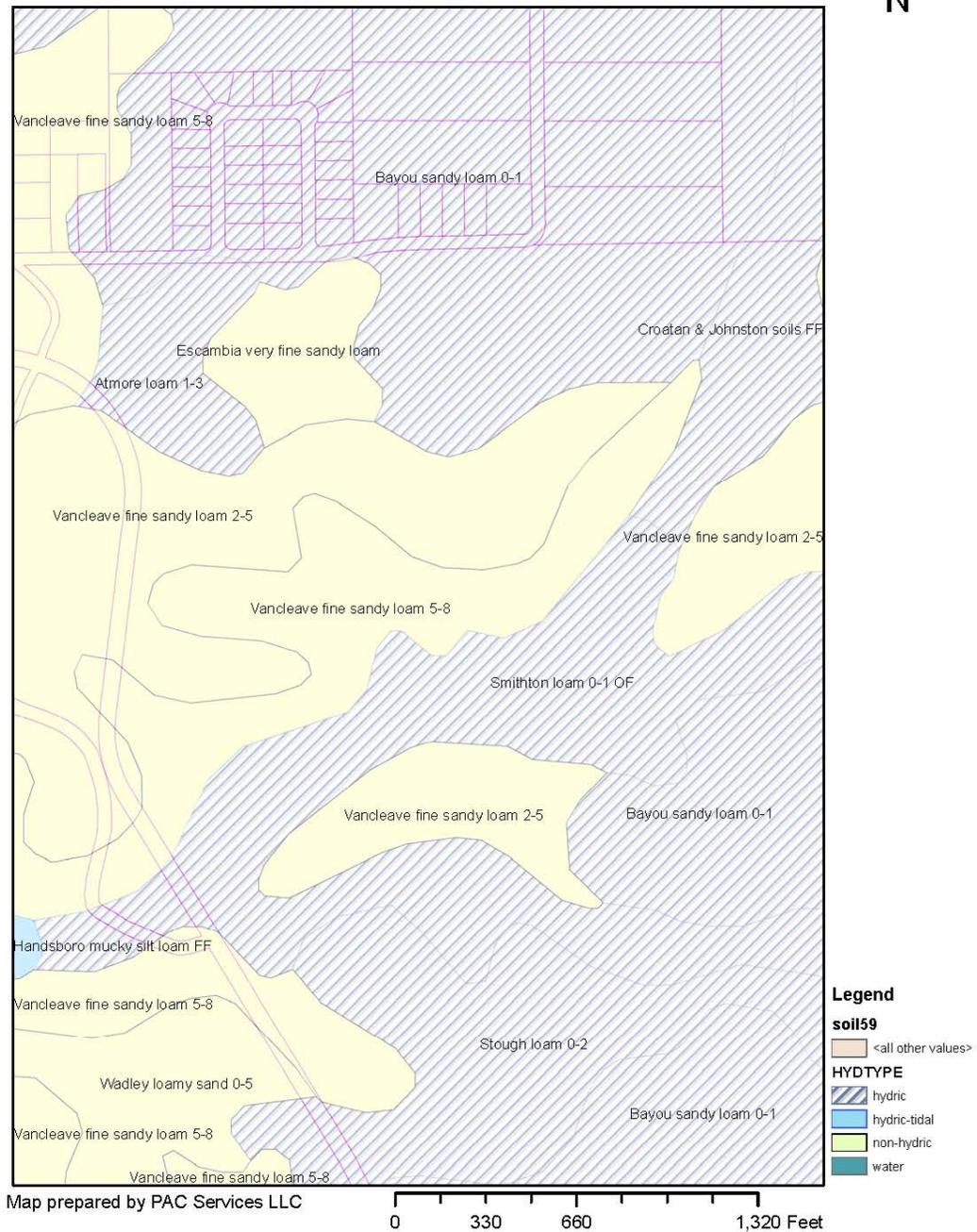
JACKSON COUNTY SCHOOL DISTRICT
Proposed School Site
Jackson County, MS



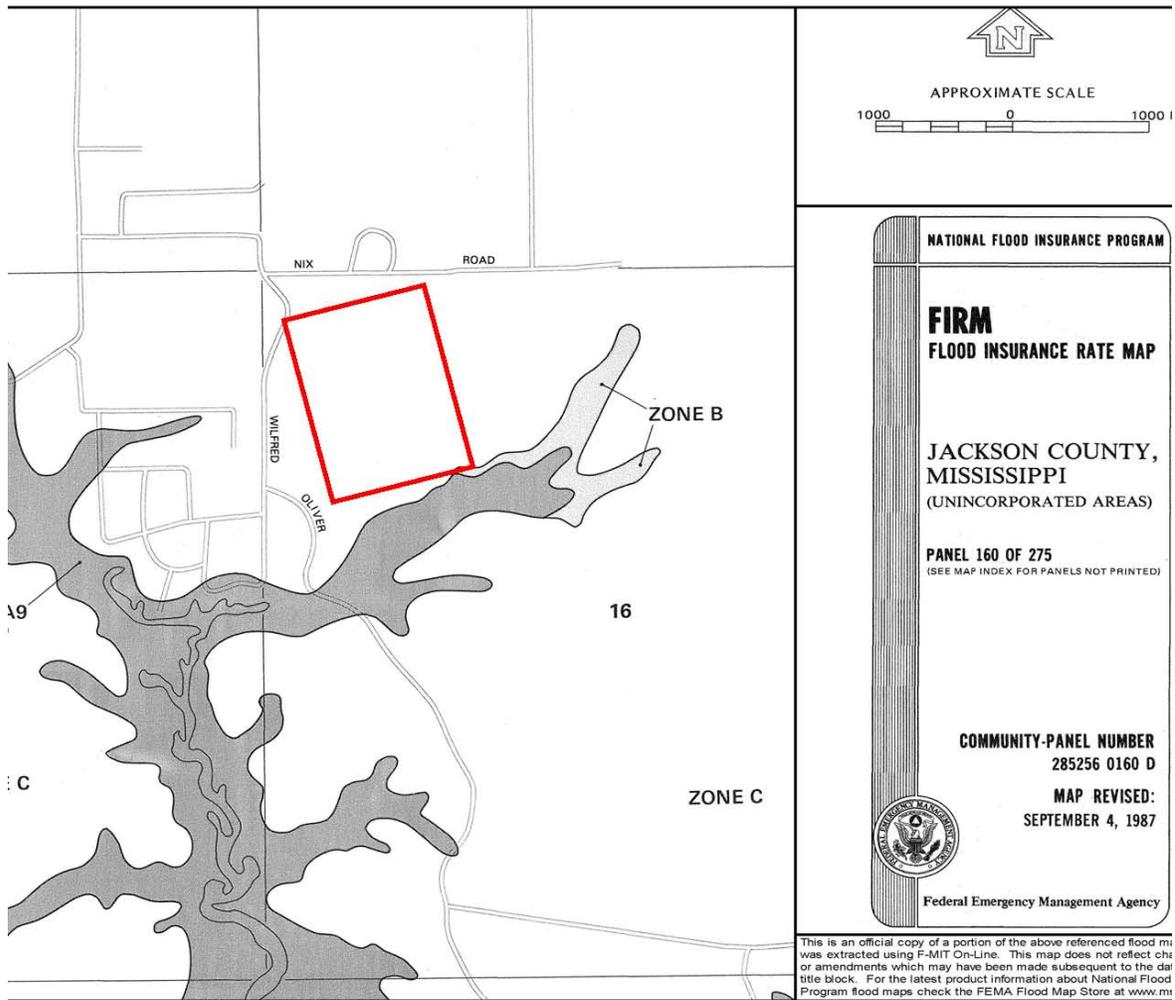
Proposed Project Location- Option #2
Aerial Photograph
Figure 3



Proposed Project Location- Option #2
Proposed Building Layout (October 2007)
Figure 4



Proposed Project Location- Option #2
NRCS soils map
Figure 5



**Proposed Project Location- Option #2
FEMA FIRM Map
Figure 6**

Appendix B
Agency Correspondence

December 6, 2006

Covington Associates Corporation
1636 Popp's Ferry Rd., M-5
Biloxi, MS 39532



Re: School Site Development
Jackson County

R# 5795

To Alane Young:

In response to your request for information dated November 30, 2006, we have searched our database for occurrences of state or federally listed species and species of special concern that occur within 2 miles of the site of the proposed project.

Based on information provided, we the proposed project likely poses no threat to listed species or their habitats. We do recommend best management practices be implemented during construction, and that adequate mitigation for wetland loss be implemented, if applicable.

Please feel free to contact us if we can provide any additional information, resources, or assistance that will help minimize negative impacts to the species and/or ecological communities identified in this review. We are happy to work with you to ensure that our state's precious natural heritage is conserved and preserved for future Mississippians.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Hicks".

Matthew Hicks, Coordinator
Mississippi Natural Heritage Program
(601) 354-7303

The Mississippi Natural Heritage Program (MNHP) has compiled a database that is the most complete source of information about Mississippi's rare, threatened, and endangered plants, animals, and ecological communities. The quantity and quality of data collected by MNHP are dependent on the research and observations of many individuals and organizations. In many cases, this information is not the result of comprehensive or site-specific field surveys; most natural areas in Mississippi have not been thoroughly surveyed and new occurrences of plant and animal species are often discovered. Heritage reports summarize the existing information known to the MNHP at the time of the request and cannot always be considered a definitive statement on the presence, absence or condition of biological elements on a particular site.

Preserving Natural Mississippi

The logo of the state of Mississippi, featuring a three-lobed shape.

2148 RIVERSIDE DRIVE ■ JACKSON, MS 39202-1353 ■ PHONE 601 354-7303 FAX 601 354-7227 ■ www.mdwfp.state.ms.us/museum

DEPARTMENT OF WILDLIFE, FISHERIES, AND PARKS

May 25, 2007

Alane C. Young
Covington Associates Corporation
1636 Popp's Ferry Rd., M-5
Biloxi, Mississippi 39532

RE: A Phase I Cultural Resources Assessment of two separate tracts of approximately 40 Acres each located on Yellow Jacket Boulevard north of Ocean Springs, MDAH Project Log #04-197-07, Jackson County

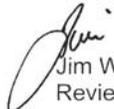
Dear Alane:

We have reviewed the January 11, 2007, cultural resources assessment by Nathan Durbin and Harriet L. Richardson Seacat, Archaeologists, received on April 26, 2007, for the above referenced undertaking, pursuant to our responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR Part 800. After review, we concur that no known cultural resources listed in or eligible for listing in the National Register of Historic Places will be affected. Therefore, we have no reservations with the project.

There remains the possibility that unrecorded cultural resources may be encountered during the project. Should this occur, we would appreciate your contacting this office immediately in order that we may offer appropriate comments under 36 CFR 800.13.

Please provide a copy of this letter to the Center for Archaeological Studies, University of South Alabama. If you have any questions, please call Pamela Lieb, MDAH Chief Archaeologist, at (601) 576-6940.

Sincerely,



Jim Woodrick
Review and Compliance Officer

FOR: H.T. Holmes
State Historic Preservation Officer

c: Clearinghouse for Federal Programs



**STATE OF MISSISSIPPI
HALEY BARBOUR, GOVERNOR**

MISSISSIPPI EMERGENCY MANAGEMENT AGENCY

**THOMAS M. "MIKE" WOMACK
EXECUTIVE DIRECTOR**

July 6, 2007

Mr. Rucks H. Robinson, Superintendent
Jackson County School District
P. O. Box 5069
Vanceleave, MS. 39565-5069

Dear Mr. Robinson:

I am pleased to respond to your letter of June 13, 2007 in which you requested our support of your efforts to build a new St. Martin High School to partial FEMA 361 Community Shelter standards. MEMA, upon FEMA approval, will provide 100% of the funding for the upgrade from normal construction cost to the FEMA 361 Standard through our Hazard Mitigation Grant Program (HMGP). It is my understanding that the initial estimate of project cost by your design firm is approximately \$ 8,385,000 for 37,666 square foot of shelter space. If there should be a substantial increase in design or cost, FEMA and the State will require an opportunity to consider the additional cost.

As you know, the Harrison County School District was recently funded for the upgrade at two of their new schools. This is certainly a cost effective method of providing storm protection to the school and the greater population of Jackson County.

My staff and I will look forward to working with you on this project. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Thomas M. "Mike" Womack
Governor's Authorized Representative

TMW/RKB

Cc: Butch Loper, Director
Jackson County Civil Defense

POST OFFICE BOX 5644 • PEARL, MISSISSIPPI 39208-5644 • PHONE 601-933-MEMA
EMERGENCY 1-800-222-6362 (24 HOUR)
TDD 1-800-445-6362



TRENT LOTT
MISSISSIPPI
FINANCE
COMMERCE, SCIENCE, AND TRANSPORTATION
RULES

United States Senate

SUITE 487, RUSSELL SENATE OFFICE BUILDING
WASHINGTON, DC 20510-2403

June 25, 2007

245 EAST CAPITOL STREET
SUITE 226
JACKSON, MS 39201

3119 PASCAGOULA STREET
SUITE A
PASCAGOULA, MS 39567

2012 15TH STREET
SUITE 451
GULFPORT, MS 39501

911 JACKSON AVENUE
SUITE 127
OXFORD, MS 38855

Mr. Rucks H. Robinson
Superintendent
Jackson County School District
Post Office Box 5069
Vanceleave, MS 39565-5069

Dear Mr. Robinson:

This is to acknowledge and thank you for contacting me regarding your Mississippi Emergency Management Agency (MEMA) Hazard Mitigation Grant application.

On your behalf, I written a letter to the Director of MEMA in support of your application. As soon as I receive more information, I will be sure to be in touch with you. In the meantime, please do not hesitate to call on me if you have any questions, or if there is some other way my office may be of service.

Again, thank you for taking the time to write and for giving me this opportunity to be helpful. With kind regards, I am

Sincerely yours,


Trent Lott

TL:jm

MBB

