



September 2, 2011

Mr. Stephen Ricks
Field Supervisor
U.S. Fish and Wildlife Service, Jackson Field Office
6578 Dogwood View Parkway
Suite A
Jackson, MS 39213

Re: Request for Project Review – Bay St. Louis-Waveland School District Proposed New Central Office Building, Hancock County, Mississippi

Dear Mr. Ricks:

On August 29, 2005, Hurricane Katrina made landfall on the Mississippi Gulf Coast, resulting in high winds, heavy rains, and flooding that caused extensive damage throughout the Bay St. Louis-Waveland School District (BWSD). Prior to Katrina, the BWSD maintained a multi-building facility near the intersection of Second Street and Ulman Avenue which included the Main Administrative Building located at 260 Carroll Avenue (see Figures 1 and 2). Due to its proximity to St. Louis Bay and the Gulf of Mexico, this facility was severely damaged by winds, heavy rains, and flooding. Functions of the damaged Main Administrative Building were relocated to a temporary facility adjacent to the SSES on the south side of Ulman Avenue.

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Nationwide Infrastructure Support Technical Assistance Consultants

A Joint Venture of URS Group, Inc. and Dewberry & Davis, LLC

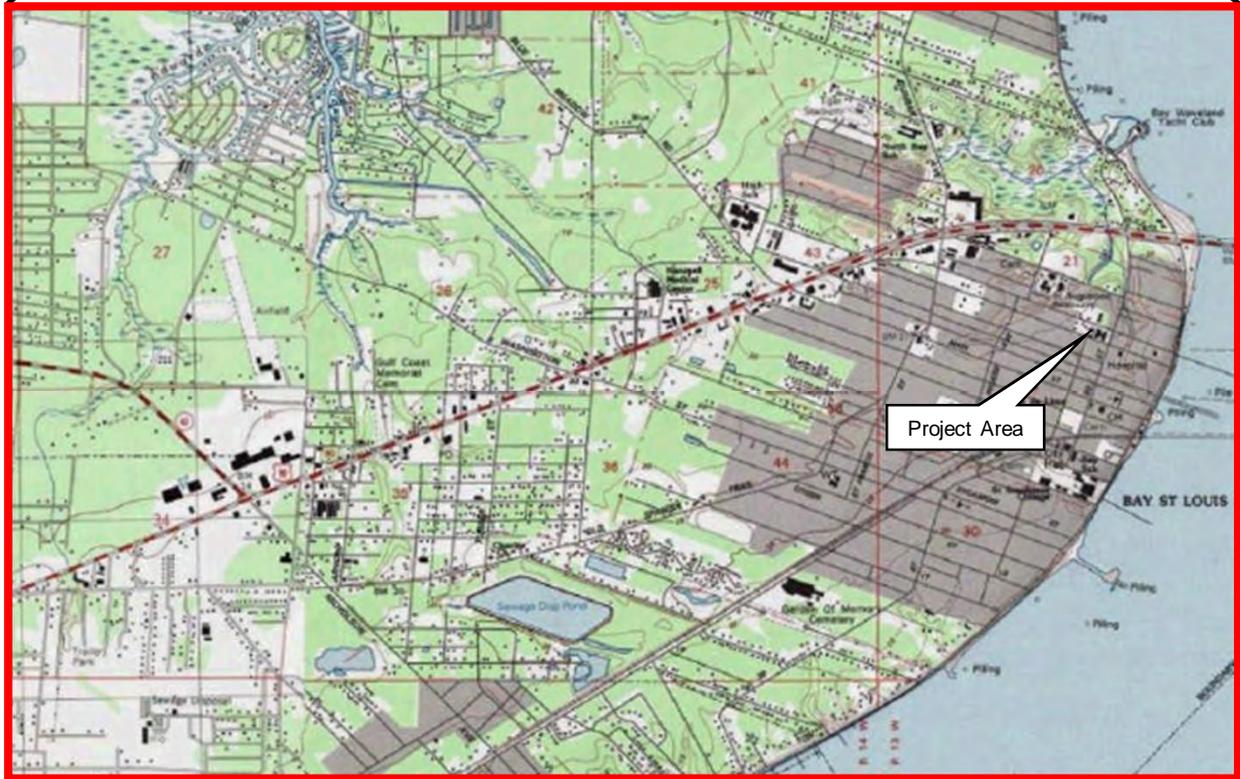
Sincerely,

NISTAC

A handwritten signature in blue ink that reads "Suzanne W Richert".

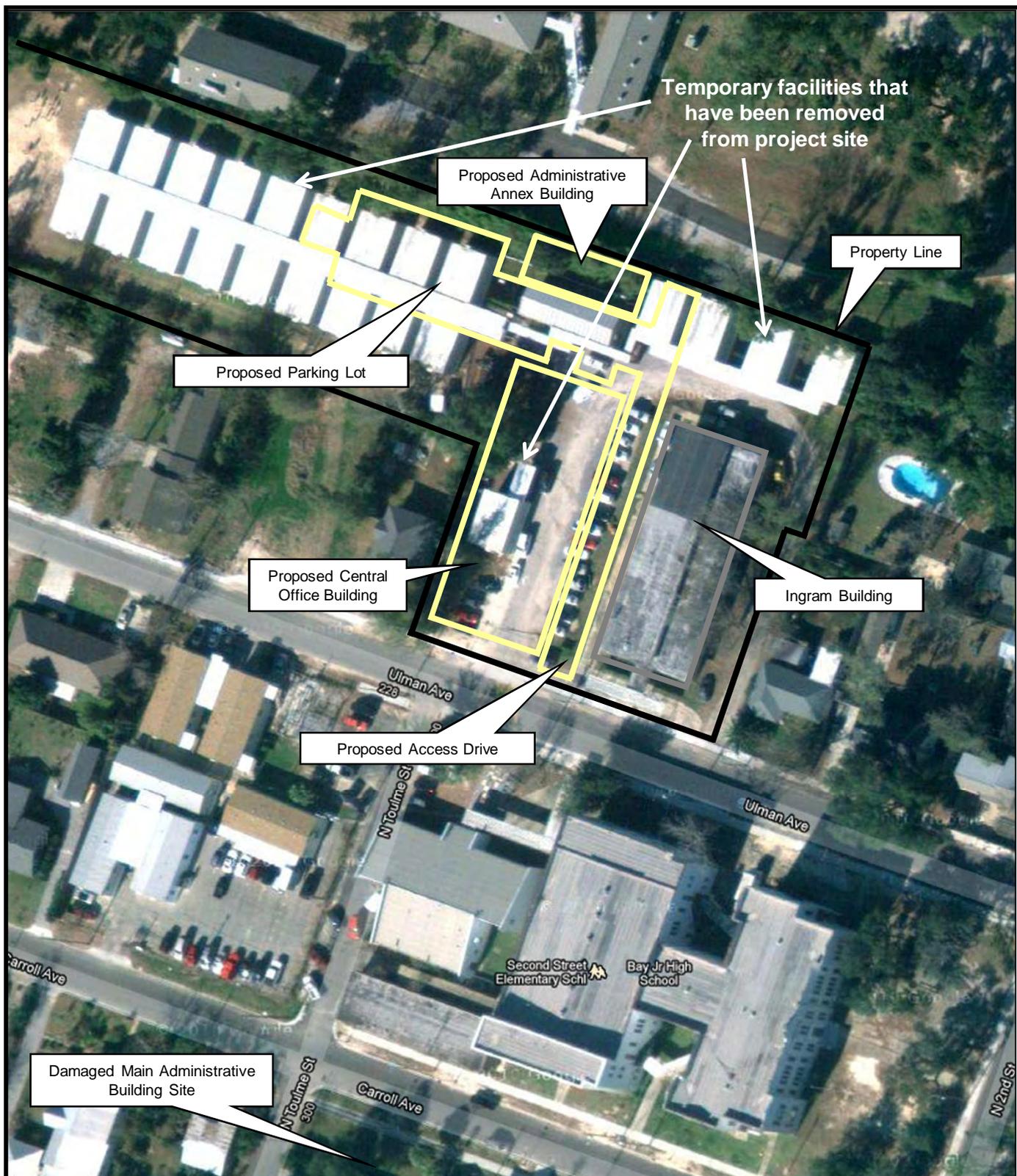
Suzanne Richert
Senior NEPA Specialist

Cc: Brian Mehok, NISTAC
Angela Chaisson, NISTAC



CLIENT FEMA			
PROJ BWSD New Central Office Building			
REVISION NO	DES BY		
SCALE	DR BY	SWR	9/1/11
FILE	CHK BY	AMC	9/2/11

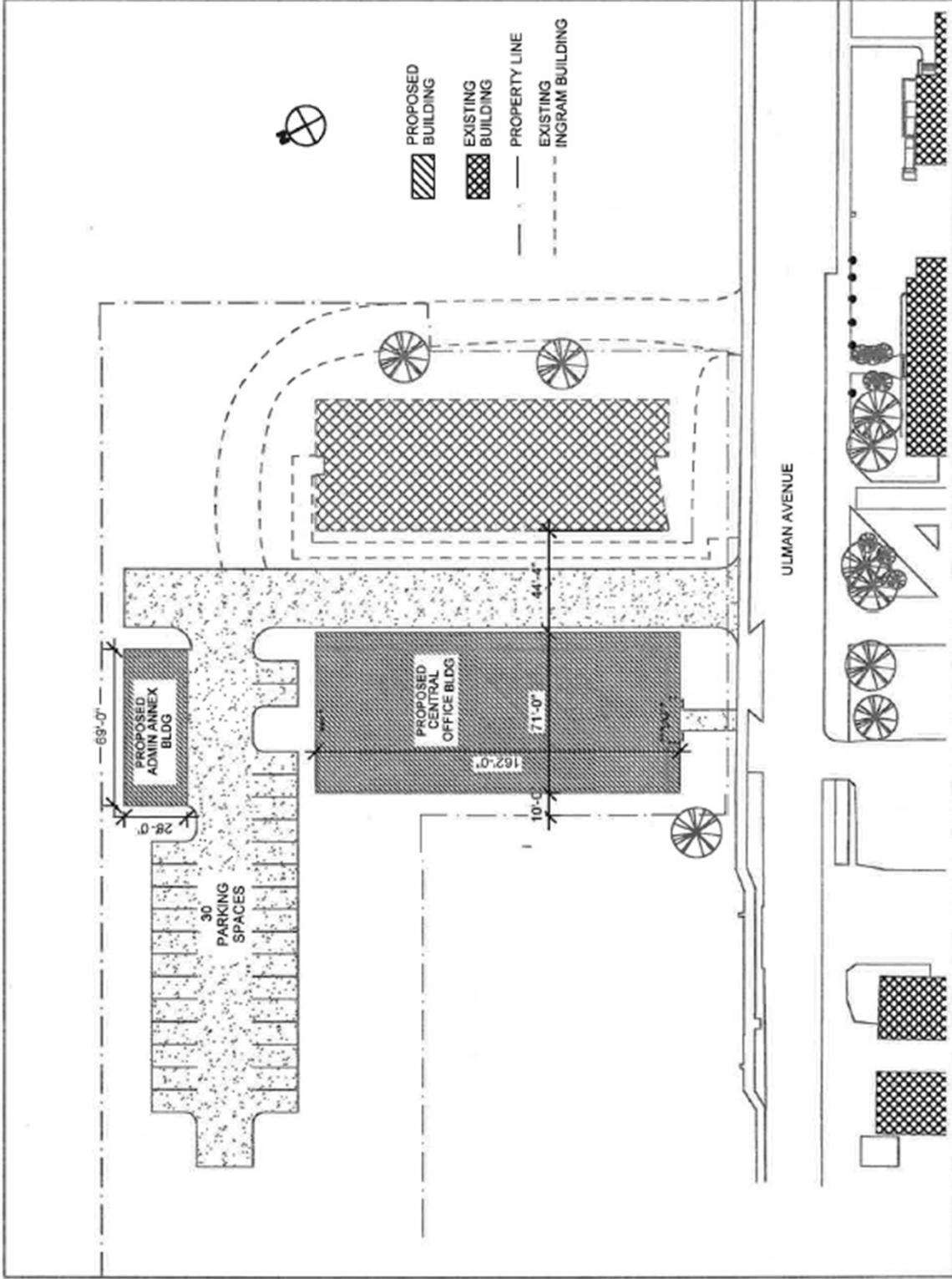
TITLE	PROJECT VICINITY
	
PROJ NO	15708003
FIGURE	1



Source: Google Earth 2011



CLIENT FEMA				TITLE PROJECT AREA		
PROJ BWSD New Central Office Building						
REVISION NO	DES BY					PROJ NO 15708003
SCALE Not to Scale	DR BY	SWR	9/1/11			FIGURE 2
FILE	CHK BY	AMC	9/2/11			



Source: Eley Guild Hardy Architects

CLIENT		FEMA	
PROJ		BWSD New Central Office Building	
REVISION NO	DES BY	DR BY	CHK BY
SCALE	Not to Scale	SWR	AMC
FILE		9/7/11	9/7/11
TITLE		PRELIMINARY SITE PLAN	
PROJ NO	FIGURE	3	



Attachment A
Photographic Log



Subapplicant Name:

Bay Waveland School District

Project:

New Central Office Building

Photo No.

1

Photo Date:

July 2011

Description:

Northwest corner of proposed 30-space parking lot looking east. Ingram Building is in background.

Source: FEMA



Photo No.

2

Photo Date:

July 2011

Description:

Looking south at proposed location of new Central Office Building. Ingram Building is on left in the photograph.

Source: FEMA





Subapplicant Name:

Bay Waveland School District

Project:

New Central Office Building

Photo No.
3

Photo Date:
July 2011

Description:

Proposed location of new Central Office Building looking north from Ulman Avenue. Ingram Building is to the right of the parked truck (just outside of the view of this photograph).

Source: FEMA



Photo No.
4

Photo Date:
July 2011

Description:

View looking east of the front side of the Ingram Building from Ulman Avenue. The new access drive would be constructed in the foreground of this photograph.

Source: FEMA





United States Department of the Interior



FISH AND WILDLIFE SERVICE

Mississippi Field Office
6578 Dogwood View Parkway, Suite A
Jackson, Mississippi 39213

October 11, 2011

IN REPLY REFER TO:
43910-2011-I-0880

NISTAC
12420 Milestone Center Drive, Suite 150
Germantown, MD 20876

Dear Ms. Richert:

The United States Fish and Wildlife Service (Service) has reviewed the information in your letter dated September 2, 2011, regarding the proposed development of a new school building and amenities for the Bay St. Louis - Waveland School District in Hancock County, Mississippi. Our comments are submitted in accordance with the Endangered Species Act (ESA) (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

Based on the information provided in your letter, the Service has determined that the proposed project will have "No Effect" on federally listed species or their habitats. No further consultation under the ESA is required with this office unless there are changes in the scope or location of the proposed project.

If you have any questions, please contact Paul Necaie in our office, telephone: (228) 493-6631, or visit our website at <http://www.fws.gov/mississippiES/>.

Sincerely,

for Stephen M. Ricks
Field Supervisor
MS Field Office



September 2, 2011

Mr. James D. Giattina
Director

U.S. Environmental Protection Agency, Region 4, Water Protection Division
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Re: Request for Project Review – Bay St. Louis-Waveland School District Proposed New Central Office Building, Hancock County, Mississippi

Dear Mr. Giattina:

On August 29, 2005, Hurricane Katrina made landfall on the Mississippi Gulf Coast, resulting in high winds, heavy rains, and flooding that caused extensive damage throughout the Bay St. Louis-Waveland School District (BWSD). Prior to Katrina, the BWSD maintained a multi-building facility near the intersection of Second Street and Ulman Avenue which included the Main Administrative Building located at 260 Carroll Avenue (see Figures 1 and 2). Due to its proximity to St. Louis Bay and the Gulf of Mexico, this facility was severely damaged by winds, heavy rains, and flooding. Functions of the damaged Main Administrative Building were relocated to a temporary facility adjacent to the SSES on the south side of Ulman Avenue.

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A Joint Venture of URS Group, Inc. and Dewberry & Davis, LLC

Sincerely,

NISTAC

A handwritten signature in blue ink that reads "Suzanne W Richert".

Suzanne Richert
Senior NEPA Specialist

Cc: Brian Mehok, NISTAC
Angela Chaisson, NISTAC



September 2, 2011

Mr. Homer L. Wilkes
State Conservationist
U.S. Department of Agriculture, Natural Resources Conservation Service
100 W. Capitol Street
Suite 1321 Federal Bldg.
Jackson, MS 39269

Re: Request for Project Review – Bay St. Louis-Waveland School District Proposed New Central Office Building, Hancock County, Mississippi

Dear Mr. Wilkes:

On August 29, 2005, Hurricane Katrina made landfall on the Mississippi Gulf Coast, resulting in high winds, heavy rains, and flooding that caused extensive damage throughout the Bay St. Louis-Waveland School District (BWSD). Prior to Katrina, the BWSD maintained a multi-building facility near the intersection of Second Street and Ulman Avenue which included the Main Administrative Building located at 260 Carroll Avenue (see Figures 1 and 2). Due to its proximity to St. Louis Bay and the Gulf of Mexico, this facility was severely damaged by winds, heavy rains, and flooding. Functions of the damaged Main Administrative Building were relocated to a temporary facility adjacent to the SSES on the south side of Ulman Avenue.

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Suzanne Richert
Senior NEPA Specialist

Cc: Brian Mehok, NISTAC
Angela Chaisson, NISTAC



Natural Resources Conservation Service
Suite 1321, Federal Building
100 West Capitol Street
Jackson, MS 39269

October 11, 2011

Suzanne Richert
Senior NEPA Specialist
Nationwide Infrastructure Support
Technical Assistance Consultants
12420 Milestone Center Drive, Suite 150
Germantown, MD 20876

Dear Ms. Richert:

This is in response of your letter dated September 2, 2011, regarding the Request for Project Review – Bay St. Louis-Waveland School District Proposed New Central Office Building in Hancock County, Mississippi.

Areas within city limits do not require an FPPA determination.

Sincerely,

A handwritten signature in black ink that reads "Delaney B. Johnson". The signature is written in a cursive style.

Delaney B. Johnson
State Soil Scientist



September 2, 2011

Dr. Susan Rees
PD

U.S. Army Corps of Engineers Mobile District, Planning Division
109 Saint Joseph Street
Mobile, AL 36602

Re: Request for Project Review – Bay St. Louis-Waveland School District Proposed New Central Office Building, Hancock County, Mississippi

Dear Ms. Rees:

On August 29, 2005, Hurricane Katrina made landfall on the Mississippi Gulf Coast, resulting in high winds, heavy rains, and flooding that caused extensive damage throughout the Bay St. Louis-Waveland School District (BWSD). Prior to Katrina, the BWSD maintained a multi-building facility near the intersection of Second Street and Ulman Avenue which included the Main Administrative Building located at 260 Carroll Avenue (see Figures 1 and 2). Due to its proximity to St. Louis Bay and the Gulf of Mexico, this facility was severely damaged by winds, heavy rains, and flooding. Functions of the damaged Main Administrative Building were relocated to a temporary facility adjacent to the SSES on the south side of Ulman Avenue.

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Suzanne Richert
Senior NEPA Specialist

Cc: Brian Mehok, NISTAC
Angela Chaisson, NISTAC



September 2, 2011

Ms. Kim Thurman
Environmental Division Administrator
Mississippi Department of Transportation, Environmental Division
Administration Building
P.O. Box 1850
Jackson, MS 39215-1850

Re: Request for Project Review – Bay St. Louis-Waveland School District Proposed New Central Office Building, Hancock County, Mississippi

Dear Ms. Thurman:

On August 29, 2005, Hurricane Katrina made landfall on the Mississippi Gulf Coast, resulting in high winds, heavy rains, and flooding that caused extensive damage throughout the Bay St. Louis-Waveland School District (BWSD). Prior to Katrina, the BWSD maintained a multi-building facility near the intersection of Second Street and Ulman Avenue which included the Main Administrative Building located at 260 Carroll Avenue (see Figures 1 and 2). Due to its proximity to St. Louis Bay and the Gulf of Mexico, this facility was severely damaged by winds, heavy rains, and flooding. Functions of the damaged Main Administrative Building were relocated to a temporary facility adjacent to the SSES on the south side of Ulman Avenue.

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Suzanne Richert
Senior NEPA Specialist

Cc: Brian Mehok, NISTAC
Angela Chaisson, NISTAC



September 2, 2011

Ms. Robin Zantow
Administrative Assistant
Mississippi Department of Marine Resources, Bureau of Wetlands Permitting
1141 Bayview Avenue
Biloxi, MS 39530

Re: Request for Project Review – Bay St. Louis-Waveland School District Proposed New Central Office Building, Hancock County, Mississippi

Dear Ms. Zantow:

On August 29, 2005, Hurricane Katrina made landfall on the Mississippi Gulf Coast, resulting in high winds, heavy rains, and flooding that caused extensive damage throughout the Bay St. Louis-Waveland School District (BWSD). Prior to Katrina, the BWSD maintained a multi-building facility near the intersection of Second Street and Ulman Avenue which included the Main Administrative Building located at 260 Carroll Avenue (see Figures 1 and 2). Due to its proximity to St. Louis Bay and the Gulf of Mexico, this facility was severely damaged by winds, heavy rains, and flooding. Functions of the damaged Main Administrative Building were relocated to a temporary facility adjacent to the SSES on the south side of Ulman Avenue.

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Suzanne Richert
Senior NEPA Specialist

Cc: Brian Mehok, NISTAC
Angela Chaisson, NISTAC



MISSISSIPPI
DEPARTMENT OF MARINE RESOURCES

September 16, 2011

Suzanne Richert
Senior NEPA Specialist
Nationwide Infrastructure Support Technical Assistance Consultants
12420 Milestone Center Drive, Suite 150
Germantown, MD 20876

RE: DMR-120086; Bay St. Louis-Waveland School District Proposed New Central Office Building

Dear Ms. Richert:

The Department of Marine Resources in cooperation with other state agencies is responsible under the Mississippi Coastal Program (MCP) for managing the coastal resources of Mississippi. Proposed activities in the coastal area are reviewed to insure that the activities are in compliance with the MCP.

The Department has received a request to review a proposal for the construction of a new Central Office Building located on Ulman Avenue in Bay St. Louis, Hancock County, Mississippi. The Department has no objections provided there are no direct or indirect impacts to coastal wetlands and no coastal program agency objects to the proposal. If wetland impacts are anticipated, an application should be submitted to this office for review. Thank you for the opportunity to comment on your project.

For more information or questions concerning this correspondence, contact Jeremy Overstreet with the Bureau of Wetlands Permitting at (228) 523-4118 or jeremy.overstreet@dmr.ms.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Willa J. Brantley".

Willa J. Brantley
Bureau Director, Wetlands Permitting

WJB/jro



September 2, 2011

Ms. Michelle Vinson
Mississippi Department of Environmental Quality
Office of Pollution Control, Environmental Permits Division
P.O. Box 2261
Jackson, MS 39289-0385

Re: Request for Project Review – Bay St. Louis-Waveland School District Proposed New Central Office Building, Hancock County, Mississippi

Dear Ms. Vinson:

On August 29, 2005, Hurricane Katrina made landfall on the Mississippi Gulf Coast, resulting in high winds, heavy rains, and flooding that caused extensive damage throughout the Bay St. Louis-Waveland School District (BWSD). Prior to Katrina, the BWSD maintained a multi-building facility near the intersection of Second Street and Ulman Avenue which included the Main Administrative Building located at 260 Carroll Avenue (see Figures 1 and 2). Due to its proximity to St. Louis Bay and the Gulf of Mexico, this facility was severely damaged by winds, heavy rains, and flooding. Functions of the damaged Main Administrative Building were relocated to a temporary facility adjacent to the SSES on the south side of Ulman Avenue.

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Suzanne Richert
Senior NEPA Specialist

Cc: Brian Mehok, NISTAC
Angela Chaisson, NISTAC



STATE OF MISSISSIPPI

HALEY BARBOUR

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

TRUDY D. FISHER, EXECUTIVE DIRECTOR

September 28, 2011

Ms. Suzanne Richert, Senior NEPA Specialist
Nationwide Infrastructure Support Technical Assistance Consultants
12420 Milestone Center Drive, Suite 150
Germantown, MD 20876

RE: School District Central Office Building, City of Bay St. Louis, Hancock County, MS

Dear Ms. Richert:

The Mississippi Department of Environmental Quality (MDEQ) has received your "Request for Environmental Assessment Statutory-Regulatory Compliance" determination request for the Central Office Building in the City of Bay St. Louis in Hancock County. Enclosed is a copy of MDEQ's CERCLA/Uncontrolled Sites File List that identifies sites within Hancock County that have potential contamination issues related to them. There are, however, many abandoned sites around the State that we are not aware of. An environmental site assessment may be necessary to evaluate potential recognized environmental conditions within the proposed project. If recognized environmental conditions are encountered, please contact me at 601-961-5388.

You can obtain additional information by accessing the following web addresses:

<http://www.epa.gov/enviro> (RCRA report and others)

<http://opc.deq.state.ms.us/default.aspx>

<http://muster.deq.state.ms.us/webreportapplication/ustsearchwf.aspx>

This project may be eligible for environmental site assessment assistance from MDEQ through the Targeted Brownfield Assessment (TBA) Program. (See attachment). Should you desire additional information on the application process for the TBA, please contact me at 601-961-5388.

Sincerely,

Andy McCain

Enclosures

OFFICE OF POLLUTION CONTROL

POST OFFICE BOX 2261 • JACKSON, MISSISSIPPI 39225-2261 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER



September 2, 2011

Dr. Richard Benton
Bureau Director
Mississippi Department of Agriculture and Commerce
P.O. Box 1609
Jackson, MS 39215

Re: Request for Project Review – Bay St. Louis-Waveland School District Proposed New Central Office Building, Hancock County, Mississippi

Dear Dr. Benton:

On August 29, 2005, Hurricane Katrina made landfall on the Mississippi Gulf Coast, resulting in high winds, heavy rains, and flooding that caused extensive damage throughout the Bay St. Louis-Waveland School District (BWSD). Prior to Katrina, the BWSD maintained a multi-building facility near the intersection of Second Street and Ulman Avenue which included the Main Administrative Building located at 260 Carroll Avenue (see Figures 1 and 2). Due to its proximity to St. Louis Bay and the Gulf of Mexico, this facility was severely damaged by winds, heavy rains, and flooding. Functions of the damaged Main Administrative Building were relocated to a temporary facility adjacent to the SSES on the south side of Ulman Avenue.

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Suzanne Richert
Senior NEPA Specialist

Cc: Brian Mehok, NISTAC
Angela Chaisson, NISTAC



September 2, 2011

Mr. Don Underwood
Executive Director
Mississippi Soil and Water Conservation Commission
P.O. Box 23005
Jackson, MS 39225-3005

Re: Request for Project Review – Bay St. Louis-Waveland School District Proposed New Central Office Building, Hancock County, Mississippi

Dear Mr. Underwood:

On August 29, 2005, Hurricane Katrina made landfall on the Mississippi Gulf Coast, resulting in high winds, heavy rains, and flooding that caused extensive damage throughout the Bay St. Louis-Waveland School District (BWSD). Prior to Katrina, the BWSD maintained a multi-building facility near the intersection of Second Street and Ulman Avenue which included the Main Administrative Building located at 260 Carroll Avenue (see Figures 1 and 2). Due to its proximity to St. Louis Bay and the Gulf of Mexico, this facility was severely damaged by winds, heavy rains, and flooding. Functions of the damaged Main Administrative Building were relocated to a temporary facility adjacent to the SSES on the south side of Ulman Avenue.

BWSD has requested FEMA funding for a proposed project to construct a new Central Office Building and a new Administrative Annex Building on the BWSD property just west of the Ingram Building (see Figures 2 and 3). The new Central Office Building will be a 10,000- to 12,000-square-foot two-story structure located at 213 Ulman Avenue. The building footprint is similar in width and length to the adjacent Ingram Building. The new Administrative Annex Building will be located directly north and behind the new Central Office Building. This building will be a 2,550-square-foot single-story, concrete masonry unit. A new access drive from Ulman Avenue would be constructed just west of the Ingram Building, with a new 30-space parking area constructed between the two new buildings. The project site is an open lot in an urban setting between two existing structures – the Ingram Building to the east and a residence to the west. The terrain is relatively flat and vegetated mostly with grasses, as well as trees and shrubs (see photographs in Attachment A). The new buildings would be outside the 100-year floodplain (Flood Zone C), but within the advisory base flood elevation.

NISTAC has been retained by FEMA to prepare an Environmental Assessment (EA) for the proposed project. In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, NISTAC requests that your agency review the proposed project and provide comments and any available information on resources under your agency's jurisdiction within the project area. If you have any questions or need additional information, please contact me by telephone at 276.223.8755 or electronic mail at suzanne.richert@urs.com.



Nationwide Infrastructure Support Technical Assistance Consultants

A Joint Venture of URS Group, Inc. and Dewberry & Davis, LLC

Sincerely,

NISTAC

A handwritten signature in blue ink that reads "Suzanne W. Richert".

Suzanne Richert
Senior NEPA Specialist

Cc: Brian Mehok, NISTAC
Angela Chaisson, NISTAC



FEMA

U.S. Department of Homeland Security
Federal Emergency Management Agency
Mississippi Recovery Office
Physical Address
220 Poppo Ferry Rd.
Building A South
Biloxi, MS 39532

December 5, 2011

Mr. Greg Williamson
Mississippi Department of Archives and History
Historic Preservation Division
P.O. Box 571
Jackson, MS 39205-0571

Re: Request for Section 106 Concurrence – Construction of New Central Administration Office Building and Annex Building (PA ID 045-00E4A-00, PW 11250 – Alternative Project), Bay St. Louis, Hancock County, Mississippi

Dear Mr. Williamson:

The Bay St. Louis-Waveland School District (BWSD) has applied for Federal funding from the Federal Emergency Management Agency (FEMA) to construct a new Central Administration Office Building (Central Administration Building) and Annex Building (Annex) on BWSD property located next to the Ingram Building. This property is on the north side of Ulman Avenue at 213 Ulman Avenue, Bay St. Louis, Hancock County, Mississippi (Figures 1 and 2). On August 29, 2005, Hurricane Katrina made landfall in Mississippi, damaging numerous facilities associated with the BWSD. Among the buildings damaged were the Second Street Elementary School (SSES) and the Ingram Building, both administration buildings of BWSD. Section 106 has been resolved for the abandonment of these buildings through the negotiation of a Memorandum of Agreement (MOA). Executed on September 14, 2011, this agreement document was signed by representatives of FEMA, the Advisory Council on Historic Preservation (ACHP), the Mississippi Department of Archives and History (MDAH), the Mississippi Emergency Management Agency (MEMA), and BWSD. This MOA addresses the disposition of the SSES and the Ingram Building and the construction of a new Central Administration Building and Annex.

Project Description (Undertaking)

The BWSD proposes to construct a new Central Administration Building and Annex – two detached buildings (Attachment A) – to be located on BWSD property at 213 Ulman Avenue adjacent to the Ingram Building. As proposed, the new Central Administration Building will be a 10,450-square foot (SF) one-story building. This building will house administrative offices. As proposed, the Annex will be a 2,200-SF one-story building. This building will house both information technology and maintenance functions. In a letter dated September 28, 2011, from Mr. Brad Barlow, Project Manager with the

BWSD, to Mr. Thomas M. Womack with MEMA, Mr. Barlow states that the Central Administration Building will be a steel structure with metal stud infill, and the Annex will be a pre-engineered structure with metal stud and masonry infill. An Eley Guild Hardy architectural narrative states that the exterior brick veneer and stucco finish are intended to be consistent with the historic character of the neighborhood and the building interiors will be finished with gypsum board over metal stud framing.

The Central Administration Building will be located on BWSD property adjacent to the west elevation of the Ingram Building. The footprint of the Central Administration Building is similar in width and length to the adjacent Ingram Building. The Annex will be located to the west of the proposed Central Administration Building and behind adjacent buildings and vegetation, reducing visibility from Ulman Avenue. An access drive from Ulman Avenue will be constructed between the Ingram Building and the Central Administration Building. The access drive will extend to the west along the northern portion of the entire lot, making a loop at the westernmost end of the property. A 56-space parking area will be constructed to the northwest of the proposed Central Administration Building. The Annex is located within this parking lot.

The pre-disaster functions of the extant Main Administration Building at 260 Carroll Avenue and the SSES Central Administration Maintenance Building (no longer extant) will be transferred to the new Central Administration Building. The SSES Central Administration Maintenance Building was demolished immediately following Hurricane Katrina because it was not structurally sound. Since the existing Main Administration Building is located on the SSES property, Section 106 was resolved per the stipulations in the MOA referenced above and the Main Administration Building will be mothballed and maintained by BWSD.

The proposed undertaking will include the abandonment and removal of the temporary administration facility housed in five portable trailers on the south side of Ulman Avenue adjacent to the SSES, and relocation of the functions to the new Central Administration Building and Annex.

Previous Section 106 Coordination

In an e-mail dated August 15, 2011, BWSD Project Manager Mr. Barlow provided project information to Mr. Kenneth P'Pool of the MDAH in response to his request for a narrative, site plan, and boundary survey from Eley Guild Hardy Architects, hired on behalf of the BWSD. This correspondence included a narrative describing the proposed buildings, site plan, anticipated improvements, and a boundary survey completed by the architecture firm. BWSD subsequently revised their design and Ms. Elrhei Thibodeaux, FEMA Historic Preservation Specialist, submitted the revised plans, which included a site plan, conceptual building elevations, and a floor plan, via e-mail to Mr. P'Pool on September 20, 2011. In an e-mail dated September 28, 2011, Mr. P'Pool noted that MDAH had concerns regarding the proximity of the new Central Administration Building and Annex to the National Register of Historic Places (NRHP)-eligible Ingram Building and the potential negative impact on its marketability and reuse. Mr. P'Pool also indicated the preliminary opinion of MDAH that the new Central Administration

Building would not result in an adverse effect on the NRHP-listed Old Bay St. Louis Historic District (OBSLHD).

Area of Potential Effects (APE)

Under contract to FEMA through the National Infrastructure Support Technical Assistance Consultants (NISTAC), Mr. Justin Bedard, a NISTAC Archaeologist, and Mr. Oscar Beisert, a NISTAC Architectural Historian, both qualified under the *Secretary of the Interior's Professional Qualification Standards* (36 CFR Part 61) in the disciplines of archaeology and architectural history, respectively, conducted an assessment of the project's potential to affect historic properties within the APE. During the week of August 15-19, 2011, Mr. Bedard and Mr. Beisert visited the proposed project site and conducted research.

For above-ground resources, the APE consists of the entire proposed project site, including the parcel north of Ulman Avenue on which new construction will occur and the parcel on the south side of Ulman Avenue where extant temporary facilities will be removed (Figure 3). The above-ground APE also includes the surrounding an 8-city-block area adjacent to or significantly within the viewshed of the undertaking.

For archaeological resources, the APE is limited to the area of ground disturbance on the BWSD property on the north side of Ulman Avenue, consisting of the legal land parcel (3.581 acres [ac] or 1.450 hectares [ha]) on which for the new Central Administration Building and Annex and associated parking lot will be constructed. Although the entire parcel on the north side of Ulman Avenue will not be subject to ground disturbing activities, this archaeological APE was established to account for the full range of potential ground disturbance that might occur within the parcel. Ground disturbing activities with the potential to affect archaeological resources related to this project include equipment and supply staging, slab-on-grade slab excavation and construction, heavy equipment usage across the parcel, vegetation removal, utility improvements, landscape and hardscape improvements and the construction of impervious surfaces for ingress, egress and parking. The 0.85-acre ([ac] 0.344-hectare [ha]) parcel currently occupied by the temporary administration facility portable trailers was not included within the archaeological APE, as the abandonment and removal of these buildings will not have an impact on any potential subsurface archaeological deposits or features.

Identification of Historic Properties

Site Description. The proposed site of new construction (Attachment B, Photo Nos. 1-10) is bound on the south by Ulman Avenue and to the north, east, and west by developed parcels (Attachment B, Photo Nos. 11-52). The proposed site is bounded to the north by the William J. Kelley (WJK) St. Augustine's Retreat Center, a complex of new buildings at 510 North Second Street (Attachment B, Photo Nos. 30-33). To the east, the project site includes the Ingram Building (Attachment B, Photo Nos. 1, 41-44) and is bounded by numerous late nineteenth- and early twentieth-century residential dwellings along Ulman Avenue and Second Street. To the west along Ulman Avenue, immediately adjacent to the proposed project site, is an early twentieth-century dwelling followed by a succession

of late twentieth-century dwellings. The BWSO temporary facilities (Attachment B, Photo Nos. 14, 51-52) and late nineteenth- and twentieth-century dwellings with some modern-era infill are located across Ulman Avenue to the south behind the SSES (Attachment B, Photo Nos. 22-26)

According to the BWSO and map resources developed prior to Hurricane Katrina, the proposed project site was used as a playground and outdoor space for students since the school's construction in 1954. Prior to this use, the parcel appears to have been in residential use. The Bay St. Louis real estate map of 1930, prepared by the Sanborn Map Company and updated through 1960, shows that the parcel contained a small wood-frame dwelling and one wood-frame outbuilding prior to 1954. Before 1930, the real estate maps depict a vacant lot among sparse residential development along Ulman Avenue.

Above-ground Resources. Because Bay St. Louis is a widely-recognized and well-established historic district recently documented in the Old Bay St. Louis Historic District [NRHP] Determination of Eligibility Report (OBSLHD DOE) prepared by FEMA in 2010, and in consideration of the information collected during FEMA's Section 106 activities associated with the SSES, efforts to identify additional above-ground historic properties in the APE were limited to fieldwork and cursory research. The OBSLHD DOE was the primary source of information on historic properties in the above-ground APE. Information obtained from MDAH by FEMA during previous studies conducted in Bay St. Louis was utilized, including information on SSES and the Ingram Building. Research was conducted at the Hancock County Historical Society in Bay St. Louis. Desktop research was also conducted, and photographic and other illustrative information on Bay St. Louis, the SSES and the Ingram Building were considered.

Fifteen above-ground historic properties were identified in the APE for this undertaking. This includes the OBSLHD, which consists of 681 contributing historic properties. Fourteen of the above-ground historic properties within the APE contribute to the larger OBSLHD, which has a period of significance that extends from 1850 to 1960. Two of the fourteen above-ground historic properties are individually eligible for listing in the NRHP. Summary information on these above-ground historic properties is presented in Table 1, below.

Table 1. Historic Properties within the Above-ground APE

<i>OBSLHD DOE Resource Number</i>	<i>Resource Description</i>	<i>NRHP Eligibility/ Date of Construction</i>	<i>Source Document</i>
N/A	Old Bay St. Louis Historic District	Listed (District)/ 1850-1960	OBSLHD DOE
176	208 Carroll Avenue Center Hall/Vernacular Residence (Attachment B, Photo No. 11)	Contributing (OBSLHD)/ca. 1900-1910	OBSLHD DOE
177	212 Carroll Avenue Queen Anne/L-Plan Residence (Attachment B, Photo No. 12)	Contributing (OBSLHD)/ ca. 1895-1900	OBSLHD DOE
178	302 Carroll Avenue Shotgun/L-galleried Residence	Contributing (OBSLHD)/ 1895-1900	OBSLHD DOE

<i>OBSLHD DOE Resource Number</i>	<i>Resource Description</i>	<i>NRHP Eligibility/ Date of Construction</i>	<i>Source Document</i>
	(Attachment B, Photo No. 13)		
179	304 Carroll Avenue Center Hall/Vernacular Residence (Attachment B, Photo No. 15)	Contributing (OBSLHD)/ ca. 1895-1900	OBSLHD DOE
181	308 Carroll Avenue Vernacular Residence (Attachment B, Photo No. 16)	Contributing (OBSLHD)/ ca. 1900	OBSLHD DOE
649	400 North Second Street Bay High School/Second Street Elementary School (Attachment B, Photo No. 22)	Eligible (Individual); Contributing (OBSLHD)/ 1926-1927; 1930s addition	OBSLHD DOE; MOA
650	502 North Second Street Craftsman Bungalow/Side-Gable Residence (Attachment B, Photo No. 27)	Contributing (OBSLHD)/ 1930-1940	OBSLHD DOE
652	504 North Second Street Queen Anne Residence (Attachment B, Photo No. 28)	Contributing (OBSLHD)/ ca. 1880-1890	OBSLHD DOE
654	506 North Second Street Vernacular Residence (Attachment B, Photo No. 29)	Contributing (OBSLHD)/ 1940-1950	OBSLHD DOE
844	201 Ulman Avenue Tudor Revival Gas Station (Current Residence) (Attachment B, Photo No. 37)	Contributing (OBSLHD)/ ca. 1930-1945	OBSLHD DOE
845	205 Ulman Avenue Dutch Colonial Revival Residence (Attachment B, Photo No. 39)	Contributing (OBSLHD)/ 1924-1926	OBSLHD DOE
846	209 Ulman Avenue Ranch Residence (Attachment B, Photo No. 40)	Contributing (OBSLHD)/ ca. 1940-1948	OBSLHD DOE
847	213 Ulman Avenue Ingram Building (Attachment B, Photo Nos. 1, 41-44)	Eligible (Individual); Contributing (OBSLHD)/ 1954	OBSLHD DOE; MOA
848	301 Ulman Avenue Vernacular Bungalow/Hip Roof (Attachment B, Photo Nos. 45-46)	Contributing (OBSLHD)/ 1930-1940	OBSLHD DOE

The temporary facilities on the south side of Ulman Avenue, consisting of the five portable pre-fabricated trailers, are post-Katrina (2005) and are not known to possess historical significance necessary to be eligible for listing in the NRHP.

Archaeological Resources. The undertaking is located within a mixed residential, civil, and commercial area of the OBSLHD. The 3.581-ac (1.450-ha) parcel is L-shaped and the majority of the parcel is currently a vacant lot. The parcel is located in the Coastal Flatwoods subdivision of the East Gulf Coastal Plain province. The Coastal Flatwoods is an area approximately 16 to 24 kilometers ([km] 10 to 15 miles [mi]) wide that parallels the Gulf Coast, and is characterized by level terraces. The project site is located at an elevation of approximately 6.1 to 9.1 meters ([m] 20 to 30 feet [ft]) above mean sea level. The site lies 0.3 mile (1.6 km or 1,584 ft) due west of the Bay of St. Louis.

A visual inspection of the site did not reveal any evidence of archaeological resources on the surface, other than push-piles and modern debris at the edge of the property assumed to be associated with the temporary trailers located on the property following Hurricane Katrina. Nine archaeological sites have been identified within one mile of the project site (Table 2), indicating a moderate potential for encountering archaeological resources within the APE. None of these sites are located within the archaeological APE for the proposed undertaking.

Table 2. Previously Recorded Sites within 1 Mile of the Project Site

<i>Site No.</i>	<i>Site Name</i>	<i>Site Description/Type/Components</i>	<i>NRHP Eligibility Status</i>
22HA528	Ramsey Mound	Middle Woodland Period platform mound	Eligible
22HA541	Gibbens Site	Gulf Formational Period site of unknown type	Potentially Eligible
22HA553	N/A	Nineteenth century blacksmith shop	Unknown
22HA556	N/A	Late eighteenth to mid-nineteenth century ammunition magazine	Potentially Eligible
22HA557	N/A	Nineteenth century ammunition magazine	Unknown
22HA558	N/A	War of 1812 British soldier graves	Unknown
22HA605	Bay-Waveland Yacht Club	Late Archaic and Middle Woodland periods and Late Woodland Period Midden Historic schooner shipwreck	Potentially Eligible
22HA613	N/A	Middle to Late Woodland periods midden Historic component of unknown type	Eligible
22HA679	N/A	Middle Woodland Period	Eligible

A Phase I Archaeological Survey of the proposed project site was conducted from August 15 to 19, 2011 to locate previously unidentified archaeological resources within the APE (Appendix C of the Phase I Cultural Resources Survey Report). Work consisted of a pedestrian survey, photographic documentation, and the excavation of shovel test pits (STPs) spaced at 20-m (65.6-ft) intervals across the 3.581-ac (1.450 ha) parcel. Twenty-four STPs were placed within the archaeological APE. Artifacts were recovered from 17 STPs: 15 were positive for historic or modern artifacts and two were positive for prehistoric artifacts. A total of 202 artifacts were recovered. This included 183 historic/modern artifacts, 4 prehistoric ceramics, and one biface fragment. Fourteen oyster shells were recovered in context with modern and historic artifacts and were interpreted as fill material.

A 1930 Sanborn Insurance Map for Bay St. Louis indicates the presence of two small residential buildings north of Ulman Avenue, west of the current driveway and approximately within the footprint of the proposed Central Administration Building. This map underwent revisions as early as 1944 until roughly 1958. However, the map was not professionally republished or reprinted; instead, the revisions are manifested in actual

physical “cut and paste” alterations to the map. While the intent of the overlay was to cover outdated portions of the map, the paper used has a transparent quality, making the original layer visible. The previously mentioned residential buildings appear on the 1930 map, but disappear between 1944 and 1958. These buildings do not appear on maps prior to 1930. No structural remains or features were identified during the Phase I Archaeological Survey. The limited historic artifacts were recovered from secondary deposits. As previously mentioned, evidence from the 1930 map and its alterations indicate that these buildings were probably razed between 1944 and 1958, when they do not appear on the map. It is possible that these buildings were razed for the construction of the Ingram Building, which suggests they were no longer extant by 1954.

Two soil types, Eustis loamy fine sand and Poarch fine sandy loam, have been identified with the project area. The majority of the project area consists of Eustis series soil, a deep, excessively drained soil that formed from coarse-textured marine or fluvial sediments. Soil profiles and artifact distribution data from the Phase I Archaeological Survey suggest the parcel is a mix of intact and heavily disturbed areas.

Isolated pockets of intact soils were identified in three areas of the archaeological APE: two in the middle of the parcel and a second area at the southwestern edge. Artifacts from these intact horizons included the four prehistoric ceramic sherds and one biface fragment. The limited number and distribution of prehistoric artifacts recovered from the APE indicate they represent isolated finds. The results of these finds meet the state requirements of an archaeological site and a MDAH site card was submitted with the site named BWSO 1. MDHA assigned BWSO 1 site number 22Ha726. The site card is included in Appendix C of the Phase I Cultural Resources Survey Report. However, due to the small size of the site, as well as the evidence of significant subsurface disturbance in adjacent portions of the parcel, FEMA has determined that the site is not eligible for NRHP listing.

In the summary report, NISTAC recommended no additional work on the 3.581-ac (1.450 ha) project site. FEMA, in consideration of summary report findings, has determined no archaeological historic properties are present within the archaeological APE.

Assessment of Effects on Historic Properties

No archaeological historic properties are present within the archaeological APE and no further work is recommended; therefore, FEMA has determined that no archaeological historic properties will be affected by the proposed undertaking. However, to ensure that adverse effects to historic properties are avoided, FEMA will have an archaeologist monitor the site during construction. If unexpected discoveries are made during the course of project execution, FEMA will proceed in accordance with the statewide Programmatic Agreement executed on December 21, 2010.

Fifteen above-ground historic properties are present within the above-ground APE. These historic properties include the OBSLHD and fourteen of its 681 contributing resources. The proposed undertaking will directly affect the OBSLHD. The OBSLHD is generally

characterized by identifiable and cohesive design, methods of construction, and architectural motifs that primarily pre-date WWII. However, buildings that fall outside of the general characteristics of the historic district are present within close proximity to the project site and throughout the district.

The proposed construction is to take place within a section of the OBSLHD that consists of almost equal numbers of contributing and non-contributing resources. Fourteen resources that contribute to the historic district and 15 buildings that are non-contributing resources are located within the APE. At least 10 of the non-contributing resources are located in the immediate viewshed of the project site. Non-contributing resources exist within the APE on Carroll Avenue (Attachment B, Photo Nos. 17-20), on North Second Street (Attachment B, Photo Nos. 30-33), on North Toulme Avenue (Attachment B, Photo Nos. 34-35), and on Ulman Avenue (Attachment B, Photo Nos. 47-49).

At the rear of the SSES is a detached school building of late twentieth-century construction with no readily identifiable relationship to the historic district in appearance, design, and/or materials. Although physically disparate, the building has not diminished the NRHP eligibility of the SSES. Immediately adjacent to the project site, the Ingram Building displays Modern elements reflective of the mid-twentieth century, yet is a contributing element to the historic district.

In contrast, many of the non-contributing buildings of contemporary (recent) construction that surround the project area reference and emulate the characteristics of the historic district. Within the 300 block of Ulman Avenue and the immediate viewshed of the project site are at least three newly constructed dwellings that are sympathetic to the size and scale of neighboring historic properties, and incorporate brick and stucco as their primary cladding materials.

As demonstrated above, the OBSLHD consists of numerous non-contributing and/or physically disparate resources within its boundaries. The project site is within a less cohesive section of the historic district, and the proposed Central Administration Building and Annex will be one-story and clad in brick veneer and stucco to be consistent with the surrounding neighborhood fabric. Although the project will be immediately adjacent to two individually eligible properties – the SSES and the Ingram Building – it will not further diminish their NRHP integrity of setting and feeling. Accordingly, FEMA has determined that the undertaking will have no adverse effect on above-ground historic properties.

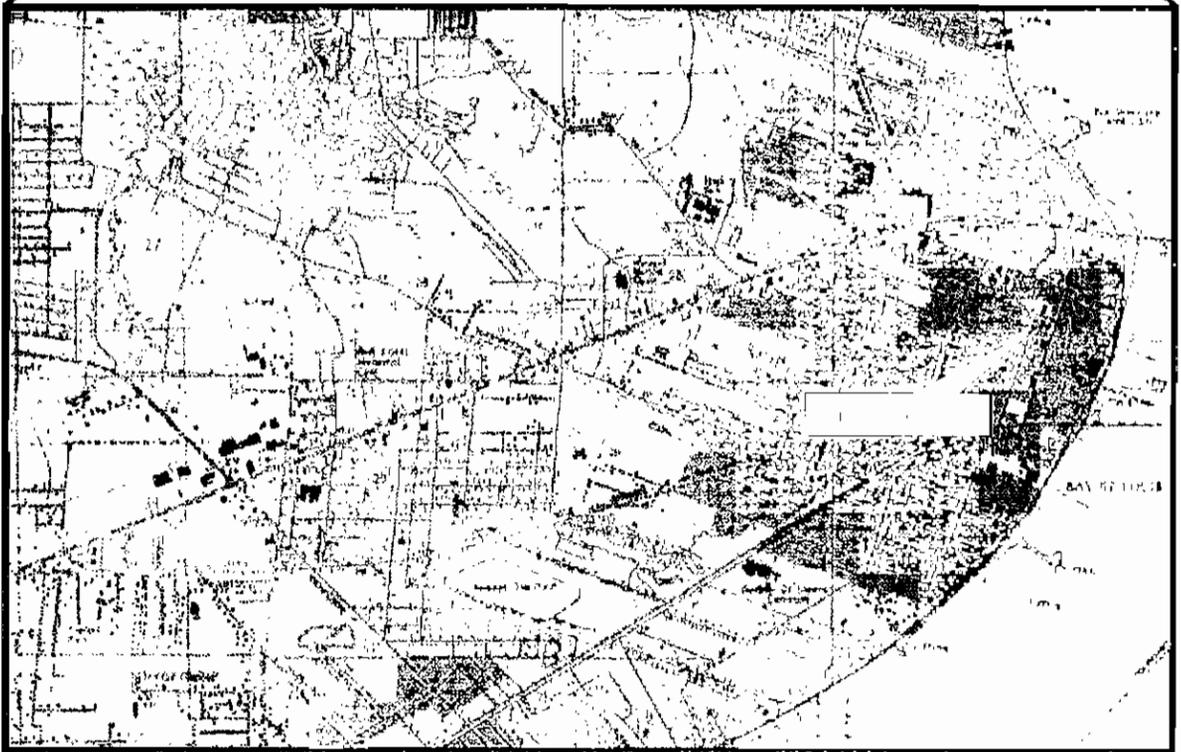
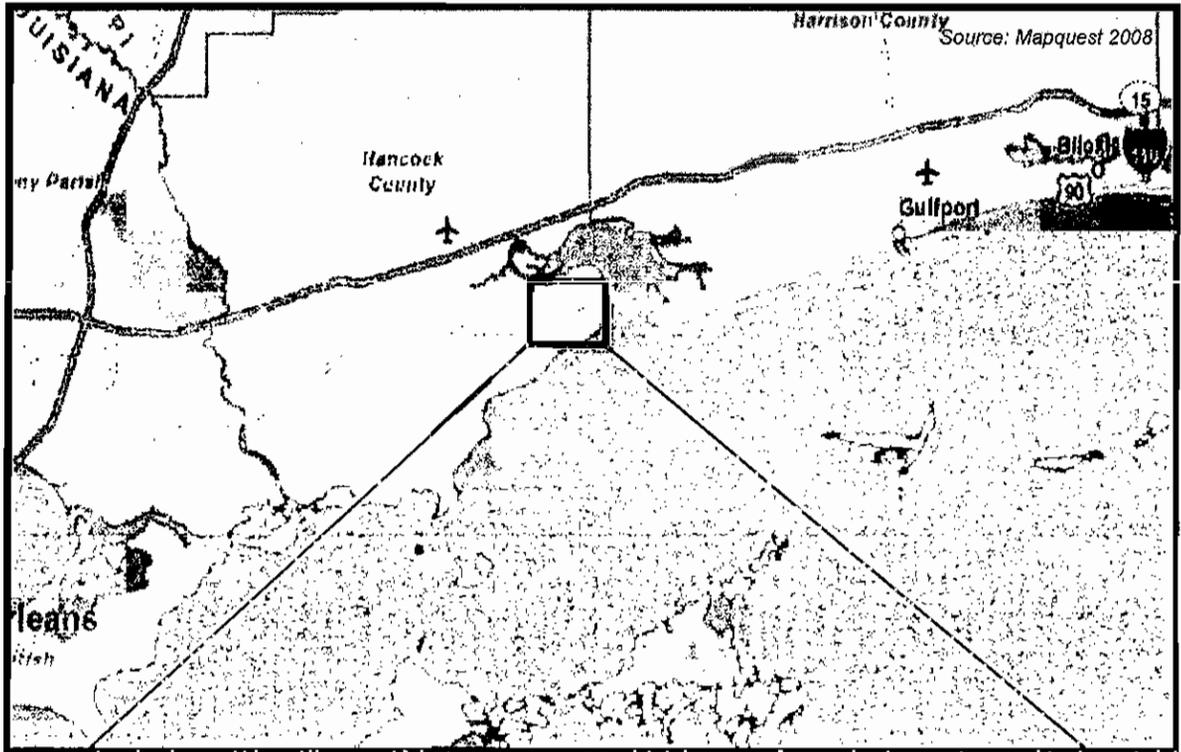
FEMA requests MDAH review and concurrence with its findings and determinations as presented in this letter and the enclosed Phase I Cultural Resources Survey Report. If you have any questions or need additional information, please contact Paul Drummond by telephone at (228) 594-2960 or electronic mail at paul.a.drummond@dhs.gov.

Sincerely,



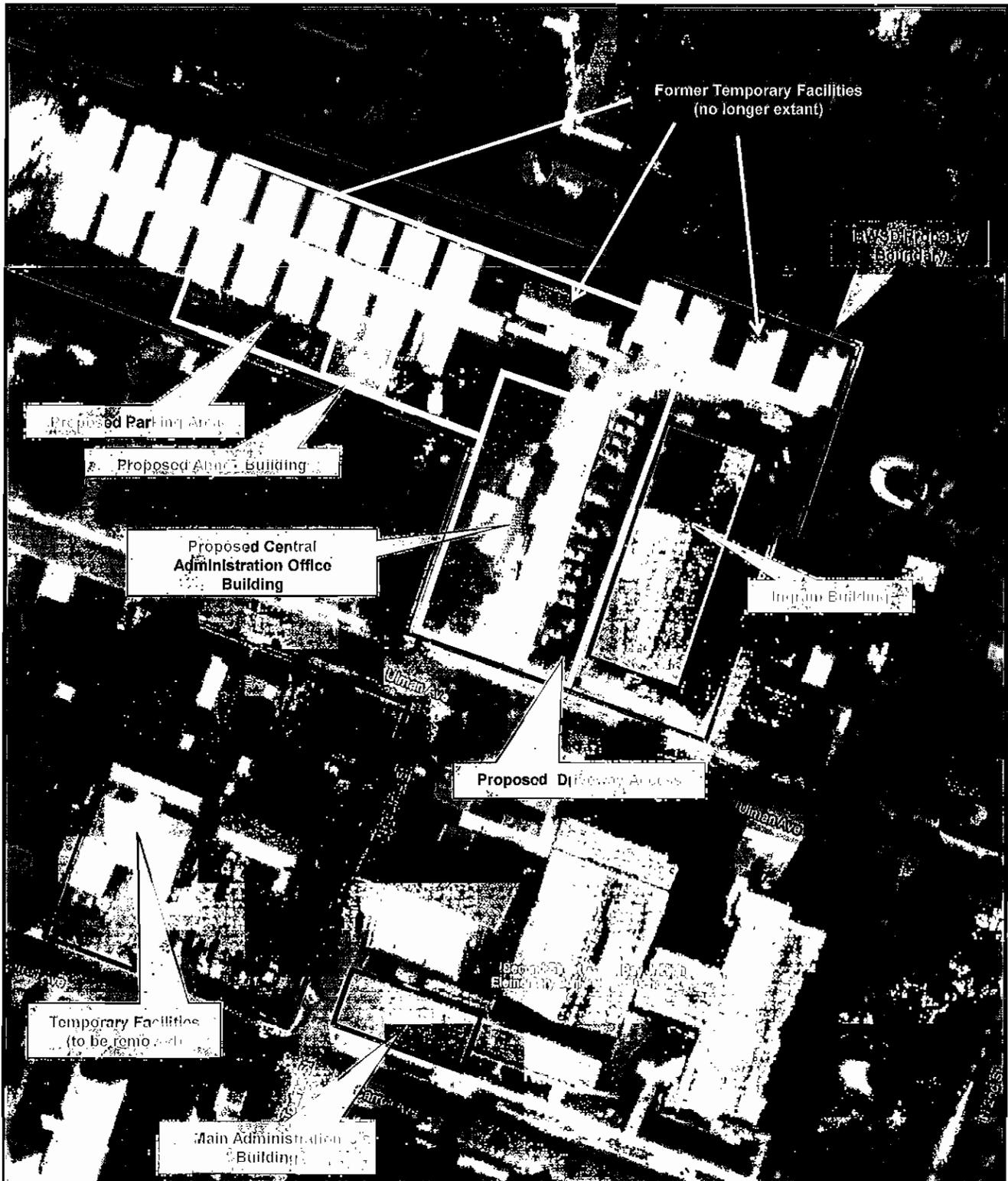
Michael Grisham
Environmental Liaison Officer

Enclosures: Figure 1: Project Location
Figure 2: Project Area
Figure 3: APE
Attachment A: Proposed Site Plan (dated 9/8/2011)
Attachment B: Photographic Log
Attachment C: *Draft Phase I Cultural Resources Survey for the Bay St.
Louis-Waveland School District New Central Administration Office
Building and Annex Building Project (November 2011)*



CLIENT	FEMA/BWSD		
PROJ	Construction of New Central Administration Office Building and Annex Building		
REVISION NO	N/A	DES BY	
SCALE	Not to Scale	DR BY	SWR 9/1/11
FILE	N/A	CHK BY	AMC 9/2/11

TITLE	PROJECT LOCATION	
 FEMA	PROJ NO	15708003
	FIGURE	1



Source: Google Earth Professional 2011

 = Project Site Boundary
 = Approximate Construction Footprint

CLIENT		FEMA/BWSD		TITLE		PROJECT AREA		
PROJ		Construction of New Central Administration Office Building and Annex Building		 FEMA		PROJ NO 15708003		
REVISION NO	N/A	DES BY				FIGURE		2
SCALE	Not to Scale	DR BY						
FILE	N/A	CHK BY						



Mississippi GIS Coordinating Council
© 2011 Google

Source: Google Earth Professional 2011

-  = Project Site Boundary
-  = Approximate Construction Footprint
-  = Above-ground Area of Potential Effects
-  = Archaeological Area of Potential Effects

CLIENT		FEMA/BWSD		TITLE		AREA OF POTENTIAL EFFECTS		
PROJ		Construction of New Central Administration Office Building and Annex Building		 FEMA		PROJ NO 15708003		
REVISION NO	N/A	DES BY				FIGURE		3
SCALE	Not to Scale	DR BY						
FILE	N/A	CHK BY						



P.O. Box 771, Jackson, MS 39201-0771
(601) 576-6850 • Fax (601) 576-6975
mdah@mississippi.gov
H.T. Holmes, Director

January 4, 2012

Mr. Michael Grisham
Environmental Liaison Officer
FEMA-DR-1604-MS
220 Popp's Ferry Road, Bldg. A South
Biloxi, Mississippi 39531

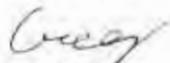
RE: Request for Concurrence for Proposed Construction of New Central Administration Office Building and Annex Building (PA ID 045-00E4A-00, PW 11250 – Alternative Project) Bay St. Louis, MDAH Project Log #12-050-11, Report # 11-0607, Hancock County

Dear Michael:

We have reviewed your request for concurrence and the November 2011 cultural resource survey report by Christopher Polglase, Principal Investigator, of NISTAC, received December 7, 2011, in accordance with our responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR Part 800. After reviewing the information provided, we concur with FEMA's determination that the project will have no adverse effect to the Old Bay St. Louis Historic District or its architectural resources, including the Ingram Building. We also concur that archaeological site 22Ha726 is not eligible for listing in the National Register of Historic Places. However, it is possible that site 22Ha726 is associated with site 22Ha679 and NRHP-listed site 22Ha528. As such, any earthmoving activities in the NE portion of the survey area in and around site 22Ha726 should be monitored by a qualified archaeologist. With this condition, we concur the project will have no adverse effect on archaeological resources.

Please provide a copy of this letter to Mr. Polglase. If you have any questions, please call us at (601) 576-6940.

Sincerely,


Greg Williamson
Review and Compliance Officer

FOR: H.T. Holmes
State Historic Preservation Officer



FEMA

U.S. Department of Homeland Security
Federal Emergency Management Agency
Mississippi Recovery Office
Physical Address
220 Popps Ferry Rd.
Building A South
Biloxi, MS 39532

December 5, 2011

Mr. Kenneth H. Carleton
Tribal Historic Preservation Officer
Mississippi Band of Choctaw Indians
101 Industrial Road
Choctaw, MS 39305

Re: Request for Section 106 Concurrence – Construction of New Central Administration Office Building and Annex Building (PA ID 045-00E4A-00, PW 11250 – Alternative Project), Bay St. Louis, Hancock County, Mississippi

Dear Mr. Carleton:

The Bay St. Louis-Waveland School District (BWSO) has applied for Federal funding from the Federal Emergency Management Agency (FEMA) to construct a new Central Administration Office Building (Central Administration Building) and Annex Building (Annex) on BWSO property located next to the Ingram Building. This property is on the north side of Ulman Avenue at 213 Ulman Avenue, Bay St. Louis, Hancock County, Mississippi (Figures 1 and 2). On August 29, 2005, Hurricane Katrina made landfall in Mississippi, damaging numerous facilities associated with the BWSO. Among the buildings damaged were the Second Street Elementary School (SSES) and the Ingram Building, both administration buildings of BWSO. Section 106 has been resolved for the abandonment of these buildings through the negotiation of a Memorandum of Agreement (MOA). Executed on September 14, 2011, this agreement document was signed by representatives of FEMA, the Advisory Council on Historic Preservation (ACHP), the Mississippi Department of Archives and History (MDAH), the Mississippi Emergency Management Agency (MEMA), and BWSO. This MOA addresses the disposition of the SSES and the Ingram Building and the construction of a new Central Administration Building and Annex.

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BWSD, to Mr. Thomas M. Womack with MEMA, Mr. Barlow states that the Central Administration Building will be a steel structure with metal stud infill, and the Annex will be a pre-engineered structure with metal stud and masonry infill. An Eley Guild Hardy architectural narrative states that the exterior brick veneer and stucco finish are intended to be consistent with the historic character of the neighborhood and the building interiors will be finished with gypsum board over metal stud framing.

The Central Administration Building will be located on BWSD property adjacent to the west elevation of the Ingram Building. The footprint of the Central Administration Building is similar in width and length to the adjacent Ingram Building. The Annex will be located to the west of the proposed Central Administration Building and behind adjacent buildings and vegetation, reducing visibility from Ulman Avenue. An access drive from Ulman Avenue will be constructed between the Ingram Building and the Central Administration Building. The access drive will extend to the west along the northern portion of the entire lot, making a loop at the westernmost end of the property. A 56-space parking area will be constructed to the northwest of the proposed Central Administration Building. The Annex is located within this parking lot.

The pre-disaster functions of the extant Main Administration Building at 260 Carroll Avenue and the SSES Central Administration Maintenance Building (no longer extant) will be transferred to the new Central Administration Building. The SSES Central Administration Maintenance Building was demolished immediately following Hurricane Katrina because it was not structurally sound. Since the existing Main Administration Building is located on the SSES property, Section 106 was resolved per the stipulations in the MOA referenced above and the Main Administration Building will be mothballed and maintained by BWSD.

The proposed undertaking will include the abandonment and removal of the temporary administration facility housed in five portable trailers on the south side of Ulman Avenue adjacent to the SSES, and relocation of the functions to the new Central Administration Building and Annex.

Previous Section 106 Coordination

In an e-mail dated August 15, 2011, BWSD Project Manager Mr. Barlow provided project information to Mr. Kenneth P'Pool of the MDAH in response to his request for a narrative, site plan, and boundary survey from Eley Guild Hardy Architects, hired on behalf of the BWSD. This correspondence included a narrative describing the proposed buildings, site plan, anticipated improvements, and a boundary survey completed by the architecture firm. BWSD subsequently revised their design and Ms. Elrhei Thibodeaux, FEMA Historic Preservation Specialist, submitted the revised plans, which included a site plan, conceptual building elevations, and a floor plan, via e-mail to Mr. P'Pool on September 20, 2011. In an e-mail dated September 28, 2011, Mr. P'Pool noted that MDAH had concerns regarding the proximity of the new Central Administration Building and Annex to the National Register of Historic Places (NRHP)-eligible Ingram Building and the potential negative impact on its marketability and reuse. Mr. P'Pool also indicated the preliminary opinion of MDAH that the new Central Administration

Building would not result in an adverse effect on the NRHP-listed Old Bay St. Louis Historic District (OBSLHD).

Area of Potential Effects (APE)

Under contract to FEMA through the National Infrastructure Support Technical Assistance Consultants (NISTAC), Mr. Justin Bedard, a NISTAC Archaeologist, and Mr. Oscar Beisert, a NISTAC Architectural Historian, both qualified under the *Secretary of the Interior's Professional Qualification Standards* (36 CFR Part 61) in the disciplines of archaeology and architectural history, respectively, conducted an assessment of the project's potential to affect historic properties within the APE. During the week of August 15-19, 2011, Mr. Bedard and Mr. Beisert visited the proposed project site and conducted research.

For above-ground resources, the APE consists of the entire proposed project site, including the parcel north of Ulman Avenue on which new construction will occur and the parcel on the south side of Ulman Avenue where extant temporary facilities will be removed (Figure 3). The above-ground APE also includes the surrounding an 8-city-block area adjacent to or significantly within the viewshed of the undertaking.

For archaeological resources, the APE is limited to the area of ground disturbance on the BWSD property on the north side of Ulman Avenue, consisting of the legal land parcel (3.581 acres [ac] or 1.450 hectares [ha]) on which for the new Central Administration Building and Annex and associated parking lot will be constructed. Although the entire parcel on the north side of Ulman Avenue will not be subject to ground disturbing activities, this archaeological APE was established to account for the full range of potential ground disturbance that might occur within the parcel. Ground disturbing activities with the potential to affect archaeological resources related to this project include equipment and supply staging, slab-on-grade slab excavation and construction, heavy equipment usage across the parcel, vegetation removal, utility improvements, landscape and hardscape improvements and the construction of impervious surfaces for ingress, egress and parking. The 0.85-acre ([ac] 0.344-hectare [ha]) parcel currently occupied by the temporary administration facility portable trailers was not included within the archaeological APE, as the abandonment and removal of these buildings will not have an impact on any potential subsurface archaeological deposits or features.

Identification of Historic Properties

Site Description. The proposed site of new construction (Attachment B, Photo Nos. 1-10) is bound on the south by Ulman Avenue and to the north, east, and west by developed parcels (Attachment B, Photo Nos. 11-52). The proposed site is bounded to the north by the William J. Kelley (WJK) St. Augustine's Retreat Center, a complex of new buildings at 510 North Second Street (Attachment B, Photo Nos. 30-33). To the east, the project site includes the Ingram Building (Attachment B, Photo Nos. 1, 41-44) and is bounded by numerous late nineteenth- and early twentieth-century residential dwellings along Ulman Avenue and Second Street. To the west along Ulman Avenue, immediately adjacent to the proposed project site, is an early twentieth-century dwelling followed by a succession

of late twentieth-century dwellings. The BWSD temporary facilities (Attachment B, Photo Nos. 14, 51-52) and late nineteenth- and twentieth-century dwellings with some modern-era infill are located across Ulman Avenue to the south behind the SSES (Attachment B, Photo Nos. 22-26)

According to the BWSD and map resources developed prior to Hurricane Katrina, the proposed project site was used as a playground and outdoor space for students since the school’s construction in 1954. Prior to this use, the parcel appears to have been in residential use. The Bay St. Louis real estate map of 1930, prepared by the Sanborn Map Company and updated through 1960, shows that the parcel contained a small wood-frame dwelling and one wood-frame outbuilding prior to 1954. Before 1930, the real estate maps depict a vacant lot among sparse residential development along Ulman Avenue.

Above-ground Resources. Because Bay St. Louis is a widely-recognized and well-established historic district recently documented in the Old Bay St. Louis Historic District [NRHP] Determination of Eligibility Report (OBSLHD DOE) prepared by FEMA in 2010, and in consideration of the information collected during FEMA’s Section 106 activities associated with the SSES, efforts to identify additional above-ground historic properties in the APE were limited to fieldwork and cursory research. The OBSLHD DOE was the primary source of information on historic properties in the above-ground APE. Information obtained from MDAH by FEMA during previous studies conducted in Bay St. Louis was utilized, including information on SSES and the Ingram Building. Research was conducted at the Hancock County Historical Society in Bay St. Louis. Desktop research was also conducted, and photographic and other illustrative information on Bay St. Louis, the SSES and the Ingram Building were considered.

Fifteen above-ground historic properties were identified in the APE for this undertaking. This includes the OBSLHD, which consists of 681 contributing historic properties. Fourteen of the above-ground historic properties within the APE contribute to the larger OBSLHD, which has a period of significance that extends from 1850 to 1960. Two of the fourteen above-ground historic properties are individually eligible for listing in the NRHP. Summary information on these above-ground historic properties is presented in Table 1, below.

Table 1. Historic Properties within the Above-ground APE

<i>OBSLHD DOE Resource Number</i>	<i>Resource Description</i>	<i>NRHP Eligibility/ Date of Construction</i>	<i>Source Document</i>
N/A	Old Bay St. Louis Historic District	Listed (District)/ 1850-1960	OBSLHD DOE
176	208 Carroll Avenue Center Hall/Vernacular Residence (Attachment B, Photo No. 11)	Contributing (OBSLHD)/ca. 1900-1910	OBSLHD DOE
177	212 Carroll Avenue Queen Anne/L-Plan Residence (Attachment B, Photo No. 12)	Contributing (OBSLHD)/ ca. 1895-1900	OBSLHD DOE
178	302 Carroll Avenue Shotgun/L-galleried Residence	Contributing (OBSLHD)/ 1895-1900	OBSLHD DOE

<i>OBSLHD DOE Resource Number</i>	<i>Resource Description</i>	<i>NRHP Eligibility/ Date of Construction</i>	<i>Source Document</i>
	(Attachment B, Photo No. 13)		
179	304 Carroll Avenue Center Hall/Vernacular Residence (Attachment B, Photo No. 15)	Contributing (OBSLHD)/ ca. 1895-1900	OBSLHD DOE
181	308 Carroll Avenue Vernacular Residence (Attachment B, Photo No. 16)	Contributing (OBSLHD)/ ca. 1900	OBSLHD DOE
649	400 North Second Street Bay High School/Second Street Elementary School (Attachment B, Photo No. 22)	Eligible (Individual); Contributing (OBSLHD)/ 1926-1927; 1930s addition	OBSLHD DOE; MOA
650	502 North Second Street Craftsman Bungalow/Side-Gable Residence (Attachment B, Photo No. 27)	Contributing (OBSLHD)/ 1930-1940	OBSLHD DOE
652	504 North Second Street Queen Anne Residence (Attachment B, Photo No. 28)	Contributing (OBSLHD)/ ca. 1880-1890	OBSLHD DOE
654	506 North Second Street Vernacular Residence (Attachment B, Photo No. 29)	Contributing (OBSLHD)/ 1940-1950	OBSLHD DOE
844	201 Ulman Avenue Tudor Revival Gas Station (Current Residence) (Attachment B, Photo No. 37)	Contributing (OBSLHD)/ ca. 1930-1945	OBSLHD DOE
845	205 Ulman Avenue Dutch Colonial Revival Residence (Attachment B, Photo No. 39)	Contributing (OBSLHD)/ 1924-1926	OBSLHD DOE
846	209 Ulman Avenue Ranch Residence (Attachment B, Photo No. 40)	Contributing (OBSLHD)/ ca. 1940-1948	OBSLHD DOE
847	213 Ulman Avenue Ingram Building (Attachment B, Photo Nos. 1, 41-44)	Eligible (Individual); Contributing (OBSLHD)/ 1954	OBSLHD DOE; MOA
848	301 Ulman Avenue Vernacular Bungalow/Hip Roof (Attachment B, Photo Nos. 45-46)	Contributing (OBSLHD)/ 1930-1940	OBSLHD DOE

The temporary facilities on the south side of Ulman Avenue, consisting of the five portable pre-fabricated trailers, are post-Katrina (2005) and are not known to possess historical significance necessary to be eligible for listing in the NRHP.

Archaeological Resources. The undertaking is located within a mixed residential, civil, and commercial area of the OBSLHD. The 3.581-ac (1.450-ha) parcel is L-shaped and the majority of the parcel is currently a vacant lot. The parcel is located in the Coastal Flatwoods subdivision of the East Gulf Coastal Plain province. The Coastal Flatwoods is an area approximately 16 to 24 kilometers ([km] 10 to 15 miles [mi]) wide that parallels the Gulf Coast, and is characterized by level terraces. The project site is located at an elevation of approximately 6.1 to 9.1 meters ([m] 20 to 30 feet [ft]) above mean sea level. The site lies 0.3 mile (1.6 km or 1,584 ft) due west of the Bay of St. Louis.

A visual inspection of the site did not reveal any evidence of archaeological resources on the surface, other than push-piles and modern debris at the edge of the property assumed to be associated with the temporary trailers located on the property following Hurricane Katrina. Nine archaeological sites have been identified within one mile of the project site (Table 2), indicating a moderate potential for encountering archaeological resources within the APE. None of these sites are located within the archaeological APE for the proposed undertaking.

Table 2. Previously Recorded Sites within 1 Mile of the Project Site

<i>Site No.</i>	<i>Site Name</i>	<i>Site Description/Type/Components</i>	<i>NRHP Eligibility Status</i>
22HA528	Ramsey Mound	Middle Woodland Period platform mound	Eligible
22HA541	Gibbens Site	Gulf Formational Period site of unknown type	Potentially Eligible
22HA553	N/A	Nineteenth century blacksmith shop	Unknown
22HA556	N/A	Late eighteenth to mid-nineteenth century ammunition magazine	Potentially Eligible
22HA557	N/A	Nineteenth century ammunition magazine	Unknown
22HA558	N/A	War of 1812 British soldier graves	Unknown
22HA605	Bay-Waveland Yacht Club	Late Archaic and Middle Woodland periods and Late Woodland Period Midden Historic schooner shipwreck	Potentially Eligible
22HA613	N/A	Middle to Late Woodland periods midden Historic component of unknown type	Eligible
22HA679	N/A	Middle Woodland Period	Eligible

A Phase I Archaeological Survey of the proposed project site was conducted from August 15 to 19, 2011 to locate previously unidentified archaeological resources within the APE (Appendix C of the Phase I Cultural Resources Survey Report). Work consisted of a pedestrian survey, photographic documentation, and the excavation of shovel test pits (STPs) spaced at 20-m (65.6-ft) intervals across the 3.581-ac (1.450 ha) parcel. Twenty-four STPs were placed within the archaeological APE. Artifacts were recovered from 17 STPs: 15 were positive for historic or modern artifacts and two were positive for prehistoric artifacts. A total of 202 artifacts were recovered. This included 183 historic/modern artifacts, 4 prehistoric ceramics, and one biface fragment. Fourteen oyster shells were recovered in context with modern and historic artifacts and were interpreted as fill material.

A 1930 Sanborn Insurance Map for Bay St. Louis indicates the presence of two small residential buildings north of Ulman Avenue, west of the current driveway and approximately within the footprint of the proposed Central Administration Building. This map underwent revisions as early as 1944 until roughly 1958. However, the map was not professionally republished or reprinted; instead, the revisions are manifested in actual

physical “cut and paste” alterations to the map. While the intent of the overlay was to cover outdated portions of the map, the paper used has a transparent quality, making the original layer visible. The previously mentioned residential buildings appear on the 1930 map, but disappear between 1944 and 1958. These buildings do not appear on maps prior to 1930. No structural remains or features were identified during the Phase I Archaeological Survey. The limited historic artifacts were recovered from secondary deposits. As previously mentioned, evidence from the 1930 map and its alterations indicate that these buildings were probably razed between 1944 and 1958, when they do not appear on the map. It is possible that these buildings were razed for the construction of the Ingram Building, which suggests they were no longer extant by 1954.

Two soil types, Eustis loamy fine sand and Poarch fine sandy loam, have been identified with the project area. The majority of the project area consists of Eustis series soil, a deep, excessively drained soil that formed from coarse-textured marine or fluvial sediments. Soil profiles and artifact distribution data from the Phase I Archaeological Survey suggest the parcel is a mix of intact and heavily disturbed areas.

Isolated pockets of intact soils were identified in three areas of the archaeological APE: two in the middle of the parcel and a second area at the southwestern edge. Artifacts from these intact horizons included the four prehistoric ceramic sherds and one biface fragment. The limited number and distribution of prehistoric artifacts recovered from the APE indicate they represent isolated finds. The results of these finds meet the state requirements of an archaeological site and a MDAH site card was submitted with the site named BWSO 1. MDHA assigned BWSO 1 site number 22Ha726. The site card is included in Appendix C of the Phase I Cultural Resources Survey Report. However, due to the small size of the site, as well as the evidence of significant subsurface disturbance in adjacent portions of the parcel, FEMA has determined that the site is not eligible for NRHP listing.

In the summary report, NISTAC recommended no additional work on the 3.581-ac (1.450 ha) project site. FEMA, in consideration of summary report findings, has determined no archaeological historic properties are present within the archaeological APE.

Assessment of Effects on Historic Properties

No archaeological historic properties are present within the archaeological APE and no further work is recommended; therefore, FEMA has determined that no archaeological historic properties will be affected by the proposed undertaking. However, to ensure that adverse effects to historic properties are avoided, FEMA will have an archaeologist monitor the site during construction. If unexpected discoveries are made during the course of project execution, FEMA will proceed in accordance with the statewide Programmatic Agreement executed on December 21, 2010.

Fifteen above-ground historic properties are present within the above-ground APE. These historic properties include the OBSLHD and fourteen of its 681 contributing resources. The proposed undertaking will directly affect the OBSLHD. The OBSLHD is generally

characterized by identifiable and cohesive design, methods of construction, and architectural motifs that primarily pre-date WWII. However, buildings that fall outside of the general characteristics of the historic district are present within close proximity to the project site and throughout the district.

The proposed construction is to take place within a section of the OBSLHD that consists of almost equal numbers of contributing and non-contributing resources. Fourteen resources that contribute to the historic district and 15 buildings that are non-contributing resources are located within the APE. At least 10 of the non-contributing resources are located in the immediate viewshed of the project site. Non-contributing resources exist within the APE on Carroll Avenue (Attachment B, Photo Nos. 17-20), on North Second Street (Attachment B, Photo Nos. 30-33), on North Toulme Avenue (Attachment B, Photo Nos. 34-35), and on Ulman Avenue (Attachment B, Photo Nos. 47-49).

At the rear of the SSES is a detached school building of late twentieth-century construction with no readily identifiable relationship to the historic district in appearance, design, and/or materials. Although physically disparate, the building has not diminished the NRHP eligibility of the SSES. Immediately adjacent to the project site, the Ingram Building displays Modern elements reflective of the mid-twentieth century, yet is a contributing element to the historic district.

In contrast, many of the non-contributing buildings of contemporary (recent) construction that surround the project area reference and emulate the characteristics of the historic district. Within the 300 block of Ulman Avenue and the immediate viewshed of the project site are at least three newly constructed dwellings that are sympathetic to the size and scale of neighboring historic properties, and incorporate brick and stucco as their primary cladding materials.

As demonstrated above, the OBSLHD consists of numerous non-contributing and/or physically disparate resources within its boundaries. The project site is within a less cohesive section of the historic district, and the proposed Central Administration Building and Annex will be one-story and clad in brick veneer and stucco to be consistent with the surrounding neighborhood fabric. Although the project will be immediately adjacent to two individually eligible properties – the SSES and the Ingram Building – it will not further diminish their NRHP integrity of setting and feeling. Accordingly, FEMA has determined that the undertaking will have no adverse effect on above-ground historic properties.

FEMA requests your review and concurrence with its findings and determinations as presented in this letter and the enclosed Phase I Cultural Resources Survey Report. If you have any questions or need additional information, please contact Paul Drummond by telephone at (228) 594-2960 or electronic mail at paul.a.drummond@dhs.gov.

Sincerely,



Michael Grisham
Environmental Liaison Officer

Enclosures: Figure 1: Project Location
Figure 2: Project Area
Figure 3: APE
Attachment A: Proposed Site Plan (dated 9/8/2011)
Attachment B: Photographic Log
Attachment C: *Draft Phase I Cultural Resources Survey for the Bay St.
Louis-Waveland School District New Central Administration Office
Building and Annex Building Project (November 2011)*