



**MAY 01 2017**

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

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

Dear Mr. P'Pool:

The Department of Labor (DOL) is in receipt of the Mississippi Department of Archives and History (MDAH) letter dated April 13, 2017 stating your decision to terminate MDAH's participation in the Section 106 consultation. While DOL is disappointed that the enthusiasm generated at the February 15, 2017 Section 106 consultation meeting, including that from the local community via their vote for Alternative No. 3, is not something that MDAH shares, we understand that the regulations permit the State Historic Preservation Officer (SHPO) to withdraw from the proceedings. The DOL accepts the MDAH decision in this regard.

As you indicated in your email cover, the DOL and the Advisory Council on Historic Preservation (ACHP) may still pursue a Memorandum of Agreement (MOA) without MDAH participation. It is DOL's intention to pursue the MOA with ACHP. The City of Gulfport will also continue to play a role, since they are an invited signatory of the MOA with clear responsibilities concerning the design approval and permitting of the project.

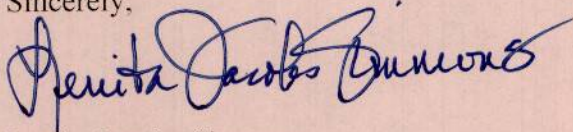
DOL will also continue to engage the 33<sup>rd</sup> Avenue High School alumni as the project develops, and keep them informed of their representation as part of the City, including inviting them to sign the MOA as a concurring party. DOL remains confident that an attractive historic preservation outcome can be achieved as a consequence of the good faith consultation and the patience exhibited by the community in their interest to see this project move forward.

DOL does not agree with MDAH's characterization of the selected alternative as described in your letter. The retention and reuse of original façades is a commonly employed preservation practice throughout the country. It also is recognized as an acceptable historic preservation compromise in situations where complete rehabilitation is infeasible or economically prohibitive. Therefore, DOL does not agree with MDAH's statements regarding the manner in which the new Gulfport Job Corps Center's has been approached given the center's program needs. In order to construct a state of the art educational training space that serves the maximum number of students, DOL has concluded that the existing buildings cannot be rehabilitated as MDAH

recommended. As an alternative, our consultants recommended that portions of the historic 33<sup>rd</sup> Avenue High School buildings be incorporated in the design of the new construction. As such, DOL believes this alternative will afford the Consulting Parties an opportunity to assist in the preservation and interpretation of a historic school that is important to the City of Gulfport.

DOL will have its consultants confer with MDAH about the role it will play in the recordation of the 33<sup>rd</sup> Avenue High School before work on the new facility begins. Otherwise, DOL will explore whether the National Park Service Regional office can provide this assistance since this will be a significant element in DOL's mitigation plan.

Sincerely,



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