



September 8, 2015

Ms. Charlotte Parrish
USPS NJ NDC
80 County Road
Jersey City, NJ 07097-9800

RE: Notice of Intent to Conduct an Environmental Assessment
Napa Franklin Station
1351 Second Street
Napa, Napa County, CA 94559-9991

Dear Ms. Parrish:

Thank you for forwarding the Notice of Intent to Conduct an Environmental Assessment for the Napa Franklin Station. The City is pleased that the physical and cultural environmental impacts of the proposed sale of the property will be evaluated pursuant to the requirements of the National Environmental Policy Act and believes that the range of alternatives to be considered by the Environmental Assessment is appropriate. We respectfully request that the following potential environmental impacts be considered and addressed in the Environmental Assessment.

- 1. Geologic Risks.** The historic building and subject property are located in an area that is susceptible to earthquakes and strong ground shaking. Short- and long-term measures for stabilizing the damaged historic building are needed to prevent further destruction to or loss of this important historic resource.

The subject property is located in an area that the United States Geological Survey (USGS) and California Geological Survey (CGS) have identified as being susceptible to earthquakes and strong ground shaking during a seismic event. In August, 2014, the South Napa Earthquake caused considerable damage in the area, prompting the President of the United States to declare the area a major disaster site. The USPS has reported that the Napa Franklin Station was significantly damaged as a result of the South Napa Earthquake. A damage assessment commissioned by the USPS concludes that extensive work will be required to repair the building and bring it up to current health and safety code requirements. The compromised structural condition of the building and its susceptibility to future earthquake events/strong ground shaking presents an immediate and on-going threat to a National Register listed historic resource.

The alternatives being evaluated in the Environmental Assessment should consider the need for measures that would address this potential impact (such as a Memorandum of Agreement under the Section 106 consultation process that has been initiated by the USPS

and/or a Preservation Covenant). Such measures would insure that the USPS or a future purchaser will (1) implement short-term measures needed to stabilize and protect the historic building from further damage should there be another earthquake event in the area; and (2) implement long-term permanent improvements to rehabilitate and restore the historic building to current health and safety requirements. Without such measures, the historic building remains susceptible to further damage or collapse - which could damage or destroy the character defining elements that have been identified as being integral to the subject historic resource.

- 2. Threat to a National Register Listed Historic Resource.** The subject property contains a historic building of national, state and local significance. Measures for preserving the character-defining historic elements of the building, including its architectural features and artistic materials and craftsmanship, are needed to ensure that these elements are protected, preserved and maintained.

The National Park Service has listed the subject property on the National Register of Historic Places (National Register Information System #85000133). The subject property is also listed as a "Landmark Property" on the City's locally adopted Historic Resources Inventory. The Napa Franklin Station is recognized as possessing considerable aesthetic value, containing one of the most flamboyantly, well decorated post offices in California. It is one of only a few post offices built in the State of California with such strong "Art Deco" design elements. The structure, with a construction date of 1933, is representative of the "New Deal" and "Works Progress Administration" building programs of President Franklin D. Roosevelt. Locally, the building's architecture is important example of architect William Corlett's work and a rare example of the Art Deco Style in Napa. Following the South Napa Earthquake, the USPS commissioned an addendum to the nomination for listing on the National Register of Historic Places (TetraTech, Brunzell & Mates, 2015). The addendum assesses interior and exterior damage that occurred as a result of the 2014 South Napa Earthquake and concludes that although the building elements that define the integrity of the resource were damaged, the damage was not great enough to impact the building's historic status and that the building continues to meet Criterion C for listing in the National Register of Historic Places. The character-defining historic elements of the building, including its architectural features and artistic materials and craftsmanship, are at risk and need to be protected and maintained to ensure that the building is preserved and remains eligible for listing on the National Register of Historic Places.

The alternatives being evaluated in the Environmental Assessment should consider the need for measures that would address this potential impact (such as a Memorandum of Agreement under the Section 106 consultation process that has been initiated by the USPS and/or a Preservation Covenant). Such measures would insure that the USPS or future purchaser will repair, restore, maintain and preserve building elements that have been identified as defining or contributing to the integrity of the subject historic resource. Without such measures, the historic building elements and materials are at risk of further damage, changes or actions that could jeopardize the building's historic status, including: deterioration by neglect, alterations or modifications that may compromise the individual or collective integrity of certain elements, or removal and demolition.

3. Consistency with Local Land Use Goals and Policies. Alternatives being considered as part of the Environmental Assessment are in conflict with local land use goals and policies contained in the City of Napa General Plan and Downtown Napa Specific Plan.

The subject property is centrally located in the City's historic downtown area. Use of the property as a postal facility has attracted residents, businesses and visitors to downtown, which has contributed to the overall vitality of the downtown area. Employment generated by use of the subject property as a postal facility has contributed to the City's downtown employment base, which is important to maintaining a viable downtown business environment.

In 2012, the City adopted a "Specific Plan" pursuant to State of California planning and zoning laws for the downtown area (Downtown Napa Specific Plan, May 2012). The primary goal of the Specific Plan is to revitalize downtown Napa into a vibrant place where residents and visitors come together to work, live, play and actively engage in the community. Overarching land use policies to achieve this goal include: (1) Revive Downtown as the primary job center in Napa; (2) Celebrate Napa's rich history and agricultural heritage; (3) Promote the downtown as the primary place where civic buildings are concentrated; (4) Build on Napa's inventory of historic structures to set the tone for downtown design; and (5) Reuse, rehabilitate and restore buildings and/or building elements wherever practical and feasible.

Of the alternatives being considered, rehabilitation of the building so that USPS operations can continue in the facility would be the alternative that best advances the goals and policies of the Downtown Napa Specific Plan. The other alternatives under consideration, including demolition of the existing facility and reconstruction of a new facility on the same site and demolition of the facility and construction of a new facility on another site, would be in conflict with the overarching goals and policies contained in the Downtown Napa Specific Plan. This is a Land Use and Zoning impact that should be considered in the Environmental Assessment.

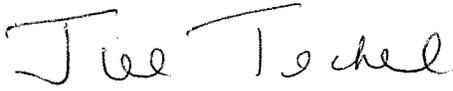
In addition to the Downtown Napa Specific Plan, the City has adopted a "General Plan" pursuant to State of California planning and zoning laws. The General Plan is a 20-year plan that guides the long term growth and physical development of the City. The General Plan contains land use goals and policies addressing preservation of the City's historic resources. The primary goal of the Historic Preservation element of the General Plan is to "preserve and maintain sites, buildings, and landscapes that serve as significant, visible reminders of the City's social, architectural and agricultural history."

Of the alternatives being considered, rehabilitation of the building so that USPS operations can continue in the facility would be the alternative that best advances the historic preservation goals and policies of the City's General Plan. Alternatives that consider demolition of the existing facility and reconstruction of a new facility on the same site or demolition of the facility and construction of a new facility on another site would be in conflict with goals and policies contained in the City's General Plan. This is a Land Use and Zoning impact that should be considered in the Environmental Assessment.

Given the historic significance and irreplaceable value of the Napa Franklin Station, we believe these potential impacts are highly relevant to the proposed action and must be considered in the Environmental Assessment. We also believe that the high level of community interest in the disposition of the Napa Franklin Station warrants that a public meeting be held prior to the conclusion of the environmental review process to allow for public review and comment on the conclusions of the Environmental Assessment prior to issuance of findings.

Thank you for your consideration of these requests. Please feel free to contact Mr. Ken MacNab of our staff at (707) 258-7860 or by e-mail: kmacnab@cityofnapa.org with any questions.

Respectfully,

A handwritten signature in cursive script that reads "Jill Techel". The signature is written in black ink and is positioned above the printed name.

Jill Techel,
Mayor

Attachments

cc: Congressman Mike Thompson
Julianne Polanco, State Historic Preservation Officer
Rick Tooker, City of Napa Community Development Director