



**National Trust for
Historic Preservation**
Save the past. Enrich the future.

September 25, 2015

Mr. Dean Cameron
United States Postal Service
Real Estate Specialist-Implementation Team
1300 Evans Avenue, Suite 200
San Francisco, CA 94188-8200

Re: Napa Franklin Station Post Office Relocation

Dear Mr. Cameron:

Thank you for the opportunity to provide comments on the proposed permanent relocation of retail post office services from the historic Napa Franklin Station Post Office, located at 1351 Second Street in Napa, California. The building was damaged in the 2014 South Napa earthquake and has been inaccessible to the public for over a year. We applaud the United States Postal Service's (USPS) reversal of its June, 2015 decision to demolish this treasured public building. However, until its future is clear, a decision on the permanent relocation of post office services would be premature.

We strongly encourage the USPS to identify and implement a plan that will result in preservation of Franklin Station's significant historic exterior and interior features and make every effort to retain services in the building prior to its making a decision on relocation. Following is a detailed statement of our concerns about the timing of the relocation process as well as recommendations for a successful outcome.

The Relocation Decision Should be Deferred Until the Future of Franklin Station is Determined

We request that USPS defer its decision on the permanent relocation of services until the end of its lease at its temporary location, which we understand to be approximately three years. The purpose of deferral would be to keep open the option of maintaining at least some post office operations in Franklin Station.

There is strong of public interest in keeping a USPS presence in the historic building where Napers have sent and received mail since the building was constructed in 1937. Further, as you and USPS Spokesperson Gus Ruiz suggested during the August 26, 2015 public meeting, a repaired Franklin Station would be an ideal location for downtown postal services. As such there is no apparent reason to rush a decision on the permanent relocation of services.

In an ideal scenario, USPS would retain, repair and maintain the building. As an alternative option, it would retain post office services in the building via a long-term leaseback of some portion of the property with a sympathetic buyer. Indeed, the ornate Art Deco lobby with service counter, brass framed bulletin boards and decorative terrazzo flooring is intended to host post office operations. Continuing its historic function in the lobby would also be supported by Secretary of the Interior Standard for Rehabilitation #1 which states as a first preference that historic properties for their historic purpose.

A leaseback should be enabled by the sale of the building at a nominal price to a sympathetic buyer. The buyer should agree to maintain the key character-defining features property through the terms of a protective covenant on the building held by a qualified covenant holder as has been proposed by USPS staff.

The Relocation Decision Should Be Deferred Pending Compliance with NHPA and NEPA

Deferral of the relocation is also required by federal environmental and historic preservation laws. The Section 106 process under the National Historic Preservation Act (NHPA) and an Environmental Assessment under the National Environmental Policy Act (NEPA) are currently underway, though not yet complete. A decision on relocation should be made only after these processes have vetted all viable preservation alternatives.

Should a relocation decision be made before these processes are finalized, the USPS would risk foreclosing options to avoid harm to historic properties. The Section 106 regulations instruct that federal agencies, including the USPS, may not take planning actions that “restrict the subsequent consideration of alternatives to avoid, minimize or mitigate the undertaking’s adverse effects on historic properties” prior to completing Section 106 review. *See* 36 C.F.R. § 800.1(c). USPS may, for instance, choose to keep and repair the property to avoid an adverse effect. Or it may negotiate a long term leaseback as a condition of the sales process to maintain the historic use of the building.

The Continuance of Post Office Operations at Franklin Station are Encouraged by Executive Orders 12072 and 13006

Two Executive Orders reinforce the strong national policy for keeping post office operations in historic buildings. These Orders instruct federal agencies a strong preference for the utilization of historic properties for federal agency activities.

Executive Order 12072, issued in 1978, states that “Federal space shall conserve existing urban resources.” Section 1-101. Further, it indicates that “[p]rocedures for meeting space needs in urban areas shall give serious consideration to the impact a site selection will have on improving the social, economic, environmental, and cultural conditions of the communities in the urban area.” Section 1.102. In conducting processes to meet federal space needs

“[a]gencies must consider the “utilization of human, natural, cultural, and community resources.” Section 1-104(c). The agency is required to consider “[u]tilization of buildings of historic, architectural, or cultural significance” and “[o]pportunities for locating cultural, educational, recreational, or commercial activities within the proposed facility.” Section 1-105(b),(e).

Executive Order 13006, issued in 1996, directs federal agencies not only to locate their operations in established downtowns, but to give first consideration to locating in historic properties within historic districts (See 61 Fed. Reg. 26,071 (May 24, 1996).) The order requires the federal government to “utilize and maintain, wherever operationally appropriate and economically prudent, historic properties and districts, especially those located in central business areas.” It also directs federal agencies to give “first consideration” to historic buildings when “operationally appropriate and economically prudent.” The order was codified into law as an amendment to the NHPA on May 26, 2000. See Pub. Law No. 106-208 (Section 4) (amending 16 U.S.C. § 470h-2(a)(1)).

Conclusion

Thank you for the opportunity to comment on this issue. We request that these comments be considered part of the record both for the USPS’ internal regulatory process as well as for Section 106 of the NHPA.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Roberts Turner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Brian Roberts Turner
Attorney

Cc (via email):

Daniel B. Delahaye, USPS Federal Preservation Officer
Charlotte Parrish, USPS Facilities Environmental Specialist
Reid Nelson, Tom McCulloch & Najah Duvall-Gabriel, ACHP
Ken MacNab & Rick Tooker, City of Napa
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