

**OFFICE OF HISTORIC PRESERVATION  
DEPARTMENT OF PARKS AND RECREATION**

1725 23<sup>rd</sup> Street, Suite 100  
SACRAMENTO, CA 95816-7100  
(916) 445-7000 Fax: (916) 445-7053  
calshpo@parks.ca.gov  
www.ohp.parks.ca.gov



October 14, 2015

Reply In Reference To: USPS\_2015\_0629\_001

Daniel B. Delahaye  
Federal Preservation Officer  
USPS Facilities HQ  
475 L'Enfant Plaza W, SW, Rm. 6631  
Washington, DC 20260-1862

RE: Proposed Historic Preservation Covenant, Napa Franklin Station, 1351 Second Street, Napa, Napa County, CA

Dear Mr. Delahaye:

Thank you for consulting with me. You do so on behalf of the United States Postal Service (USPS) in an effort to comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation at 36 CFR Part 800. You are requesting my concurrence with a Finding of No Adverse Effect. This is a change from your previous Finding of Adverse Effect.

In our first round of consultation I asked that, as outlined at 36 CFR 800.6 (a), the USPS provide alternatives to demolition in order to avoid, minimize, or mitigate adverse effects to Napa Franklin Station. I also asked that the USPS provide any available structural reports, economic analyses, or condition assessments associated with property. I also recommended the USPS hold a public meeting as part of a plan to involve the public. Since this time you have provided, in addition to your letter, a *Summary of Views Provided by Consulting Parties and the Public* (Summary of Views), and a Draft Preservation Covenant for review and comment.

I have reviewed your submittal and provide the following comments:

Summary of Views:

- 1) You note in the Summary of Views that USPS commissioned a cost of restoration analysis and released this report to the public through the media. Please provide me with a copy off this analysis so that it may be made part of the official consultation record;

Draft Covenant:

- 2) Line 1 of the version of the covenant sent to the City of Napa should clarify what exactly constitutes the initiation of construction.
- 3) Lines 2 and 14 of the draft covenant allude to the financial resources required to monitor and enforce the covenant. Typically, preservation organizations require funding for monitoring in advance of agreeing to hold covenants. Has the USPS considered providing sufficient funds to cover this cost upfront?

- 4) In regards to the list of Character Defining Features listed in Line 3, I recommend referencing the updated national register nomination instead of the 1985 nomination. I also recommend the USPS define "qualified personnel" by referencing the Secretary of the Interior's Professional Qualification Standards.
- 5) I understand that the transfer of Franklin Post Office will include a paved parking lot and a rear docking/loading area. Often times as a part of adaptive reuse projects involving historic properties, spaces like these are used to for additions. I recommend adding language to the covenant noting that any new additions to the property must conform to Items 9 and 10 of the *Secretary of the Interior Standards for Rehabilitation*.

Additional Comments:

- 6) Please clarify: is the USPS consulting on the demolition or the sale of Napa Franklin Station?
- 7) I also recommend USPS set forth a plan to secure the property against the elements as soon as possible. With the rainy season coming, there is high potential for additional damage to the property should cracks and openings in the buildings structure remain exposed.
- 8) I still strongly recommend the USPS hold at least one public meeting to address your proposal directly with consulting parties.

Thank you for considering historic resources during project planning. If you have any questions or comments, please contact Tristan Tozer of my staff at (916) 445-7027 or email at [tristan.tozer@parks.ca.gov](mailto:tristan.tozer@parks.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to be 'Julianne Polanco', with a long horizontal flourish extending to the right.

Julianne Polanco  
State Historic Preservation Officer