
**UNITED STATES POSTAL SERVICE
EXECUTIVE ORDER 13287, "PRESERVE AMERICA"
SECTION 3**

**REPORTING PROGRESS ON THE IDENTIFICATION,
PROTECTION, AND USE OF FEDERAL HISTORIC
PROPERTIES**

SEPTEMBER 30, 2014

SECTION 1 - IDENTIFICATION

1. Building upon previous Section 3 reports, please explain how many historic properties have been identified and evaluated by your agency in the past three years? Has your inventory improved? Please explain.

The Postal Service follows the definitions in the regulations implementing Sections 106 of the National Historic Preservation Act (NHPA) to classify properties it currently owns or leases as historic. The regulations under Section 106 define a historic property as one that is listed, or eligible for listing, on the National Register of Historic Places (NRHP).

The Postal Service's real property database, electronic Facilities Management System (eFMS), identifies properties, including historic buildings, in the USPS portfolio. The Postal Service began the process of reconciling Postal Service-owned properties listed on the NRHP to the properties in the eFMS in March of 2014. That reconciliation process is on-going and is likely to conclude after the close of this reporting period. Consequently, data provided herein reflects system generated output for the number of Postal Service properties that are historic and those considered possibly historic (using solely an age based formula) as of March, 2014.

Of the 8,937 USPS owned properties, which includes post office buildings, plants, distribution centers, vacant land for post office development or modular post offices, 61 properties are shown on the eFMS database to be listed in the NRHP, while 1,833 properties are considered possibly historic, by virtue of their construction date of 1964 or before. The USPS is in the process of determining whether such 1,833 properties are eligible for listing.

2. Describe your agency policies that promote and/or influence the identification and evaluation of historic properties.

It is the policy of the Postal Service, by a resolution of the Board of Governors, (Board of Governors Resolution No. 82-7, November 9, 1982), to abide by the general policies and requirements for historic preservation applicable to the Federal government set out in Sections 106, 110 and 111 of the National Historic Preservation Act of 1966 (NHPA) for activities in the areas of property acquisition, management and disposal.

The *U.S. Postal Service Facilities Guide to Real Property Acquisitions and Related Services* (Handbook RE-1) and the *Facilities Environmental Guide* (Handbook RE-6) outline current Postal Service policy regarding historic properties. These provide guidance as to how to comply with Sections 106, 110 and 111 of the NHPA, applicable regulations and Executive Orders as they relate to Facilities projects.

The Postal Service, in accordance with these policies, conducts a NRHP eligibility evaluation for properties that are the subject of proposed undertakings. When appropriate, an evaluation identified as the Postal Historic Structures Report (PHSR) is performed and is then utilized to evaluate the eligibility of a property. The PHSR findings are guided by the National Park Service standard for "Historic Structure Report, Part 1 Developmental History".

3. How has your agency established goals for the identification and evaluation of historic properties including whether they have been met?

The Postal Service' approach to identification and evaluation of its properties is to assess a property's historic significance on a case-by-case basis consequent to Section 106 compliance for proposed undertakings.

In support of its case by case evaluation efforts, the Postal Service, in cooperation with the National Council of State Historic Preservation Officers and the National Park Service, developed nationwide contexts for evaluating Postal facilities. In 2012, the USPS finalized a historic context study of Postal Service buildings dating from the period between 1940 and 1971. The project expanded on the Postal Service's previously existing historic post office context study for the period 1900 through 1940.

4. Describe any internal reporting requirements your agency may have for the identification and evaluation of historic properties, including collections (museum and archaeological).

The Facilities Department's primary recordkeeping system and real property database, eFMS, contains information on all owned and leased facilities and is accessible to all authorized USPS staff. The database includes the facility identification number, location, address, date of occupancy, current building ownership (owned, leased), NRHP status or possible eligibility, if known, and may include building images. The data set also notes whether an item from the New Deal Arts Collection is located within the building.

The eFMS system is updated by Facilities personnel based on information collected during maintenance, acquisition, or disposition of property. The Postal Service identifies its properties as historic or non-historic at the time that it engages in an undertaking and updates the database as appropriate.

In addition to the eFMS system, the Postal Service maintains a database containing information on its New Deal Arts Collection which artwork may no longer be associated with a Postal Service owned or leased facility that the eFMS tracks. This database contains basic information on each artwork including location, title, artist, media, installation date, program under which the artwork was commissioned, original cost, last known status, and, for most of the entries, a historic image of the artwork. This database is maintained by the Federal Preservation Officer.

5. Explain how your agency has employed the use of partnerships to assist in the identification and evaluation of historic properties.

The Postal Service has, during this reporting period, worked with State Historic Preservation Offices, certified local governments, local organizations and private citizens regarding the identification of historic properties and the possible nomination of properties to the NRHP. For example, the USPS supported the individual nomination of the Scappoose, Oregon Main Post Office and the Multiple Property Document for the United States Post Offices in Oregon, 1940-1971. The USPS also supported the La Jolla Historical Society's effort to nominate the La Jolla Post Office. The Postal Service also supported non-Postal proposals to nominate Postal facilities as part of an historic district to the NRHP, such as in Forest, Mississippi; Attalla, Alabama; Waverly, Iowa; and Albion, Indiana; among others,

6. Provide specific examples of major challenges, successes, and or opportunities your agency has experienced in identifying historic properties over the past three years.

As an independent establishment of the Executive Branch of the Federal government, the Postal Service receives no tax dollars for operating expenses and relies on the sale of postage, products and services to fund its operations. To address the difficult financial condition of the Postal Service, the Facilities Department was restructured in October 2012. The restructure resulted in changing from an area-based structure of responsibilities to the centralization of four activities:

- Planning
- Implementation
- Real Estate
- Repair and Alteration

Centralization has presented challenges in locating documents and information. In partial response, the Postal Service is reconciling its records directly with the NPS database. That information will be incorporated in eFMS.

Protection of Historic Properties

7. Explain how your agency has protected historic properties.

The Postal Service evaluates the physical condition of its historic properties in the same on-going manner as it evaluates all of its properties. The Postal Service employs standard methods of protection for those historic properties, including preservation, rehabilitation, and restoration as and when appropriate.

8. Describe the programs and procedures your agency has established to ensure the protection of historic properties, including compliance with Sections 106, 110, and 111 of NHPA.

Postal Service programs and procedures established to protect historic properties align with Postal policy and guidance previously referenced concerning identification and evaluation of historic properties (see question 2). In accordance with those policies and guidelines, the FPO is responsible for coordinating the Postal Service's activities regarding compliance of Facilities projects with applicable provisions of the NHPA.

Meetings are regularly held between the FPO and his staff and the Facilities management regarding Facilities projects impacting historic properties. In addition, the Law Department provides training to Facilities personnel on applicable provisions of the NHPA that affect Facilities projects.

9. Describe your agency policies that promote and/or influence the protection of historic properties.

The Postal Service engages in the following activities with respect to its portfolio of Facilities:

- Analyze properties to determine the most efficient use, including historic properties
- Maintain properties, including historic properties, and repair them as and when necessary, with repairs and maintenance of historic properties to be done in accordance with Federal historic preservation requirements, including the SOI's *Standards for the Treatment of Historic Properties* (National Park Service 1992)
- Engage in appropriate consultations under Section 106 as and when applicable.

10. Explain how your agency has employed the use of partnerships to assist in the protection of historic properties.

The Postal Service has, during this reporting period, worked with State Historic Preservation Offices, certified local governments, local organizations and private citizens regarding the protection of historic properties in connection with undertakings with respect to those properties. For example, the Postal Service used preservation covenants, filed with the deed, to place adequate and legally enforceable restrictions or conditions upon future owners to ensure long-term preservation of the property's historic significance. The Postal Service has in this reporting period worked successfully with State Historic Preservation Offices such as Pennsylvania, Illinois, Connecticut, Kansas, and Michigan; certified local governments such as Los Angeles, Santa Monica, and Burlingame, California; and private organizations including the New Jersey Historic Trust and the New York Landmarks Conservancy.

11. Provide specific examples of major challenges, successes, and/or opportunities your agency has encountered in protecting historic properties over the past three years.

The same challenges described in Question 17 affect the Postal Service's successes and opportunities to preserve historic properties.

Use

12. Explain how your agency has used historic properties.

Many historic properties are post offices. Currently the USPS is looking for operational efficiencies including consolidation of postal operations. In some cases the consolidation is from an historic property to a non-historic property and in other cases it is the opposite. For example, the United States Postal Inspection Service recently relocated into the NRHP listed Ft. Worth Downtown Station from other, non-historic leased facilities. The USPS has also engaged in adaptive re-use of postal properties, such as the NRHP listed former Washington DC City Post Office Building which is now used, among other uses, as the National Postal Museum.

Other examples of adaptive reuse occur when postal buildings are transferred to government, private or civic organizations. For example, after a \$252 million historic rehabilitation of 862,692 square feet, the former 30th Street Post Office is now home to the GSA's Philadelphia Campus. In another example, the former Venice, California Main Post Office is undergoing an estimated \$7.1 million private rehabilitation that proposes to repurpose the building as corporate offices and a 50 seat movie theater.

13. Explain the overall condition of the historic properties within your agency's control.

The Postal Service evaluates the condition of its historic properties in the same on-going manner as it evaluates all of its properties. The Postal Service monitors the condition of its properties by using a software application called the Infrastructure Condition Assessment Model (ICAM). This software allows the Postal Service to evaluate and determine necessary work to bring properties to the requisite condition. Historic buildings are included in this ICAM process and are monitored and repaired as needed.

14. Describe your agency policies that promote and/or influence the use of its historic properties.

The Postal Service uses its historic properties in the same way it uses all of its properties, to support the mission of the Postal Service.

15. Explain how your agency has used Section 111 (16 U.S.C. § 470h-3) of NHPA in the protection of historic properties.

The Postal Service responsibilities under Section 111 of the NHPA include, to the extent practicable, the development and establishment of alternatives for historic properties that are not needed by the Postal Service for operations. Leasing of the Postal Service's historic properties to others has not been determined to be practicable for the Postal Service given the financial constraints of the Postal Service. The Postal Service is not in a position to become a national landlord with numerous properties across the United States.

16. Explain how your agency has employed the use of partnerships to assist in the use of historic properties.

When the Postal Service determines that it will engage in an undertaking with respect to a property that the Postal Service determines is historic, the Postal Service works with State Historic Preservation Offices, certified local governments and private organizations and entities to develop appropriate safeguards to ensure long-term protection of the historic character defining features of the property in connection with the undertaking.

17. Provide specific examples of major challenges, successes, and/or opportunities your agency has encountered in using historic properties over the past three years.

The Postal Service has engaged in disposals of historic properties in order to achieve efficiencies of operations and cost savings. These disposals have presented opportunities for adaptive reuse by the new owners.

18. Describe your agency's sustainability goals and climate change adaptation planning and how stewardship of historic properties is being addressed.

The Postal Service is building on the work it began in June 2011, when it released its first climate change adaptation policy. The following June, the Postal Service published a high-level climate adaptation plan. In June 2013, the Postmaster General established a USPS Climate Change Adaptation Working Group (CCAWG). This group representing functional experts from across the Postal Service was tasked with creating the *United States Postal Service 2014 Strategic Sustainability Performance Plan* (SSPP), which was released in June 2014. It is intended that the CCAWG will continue to examine the Postal Service's approach to climate adaptation.