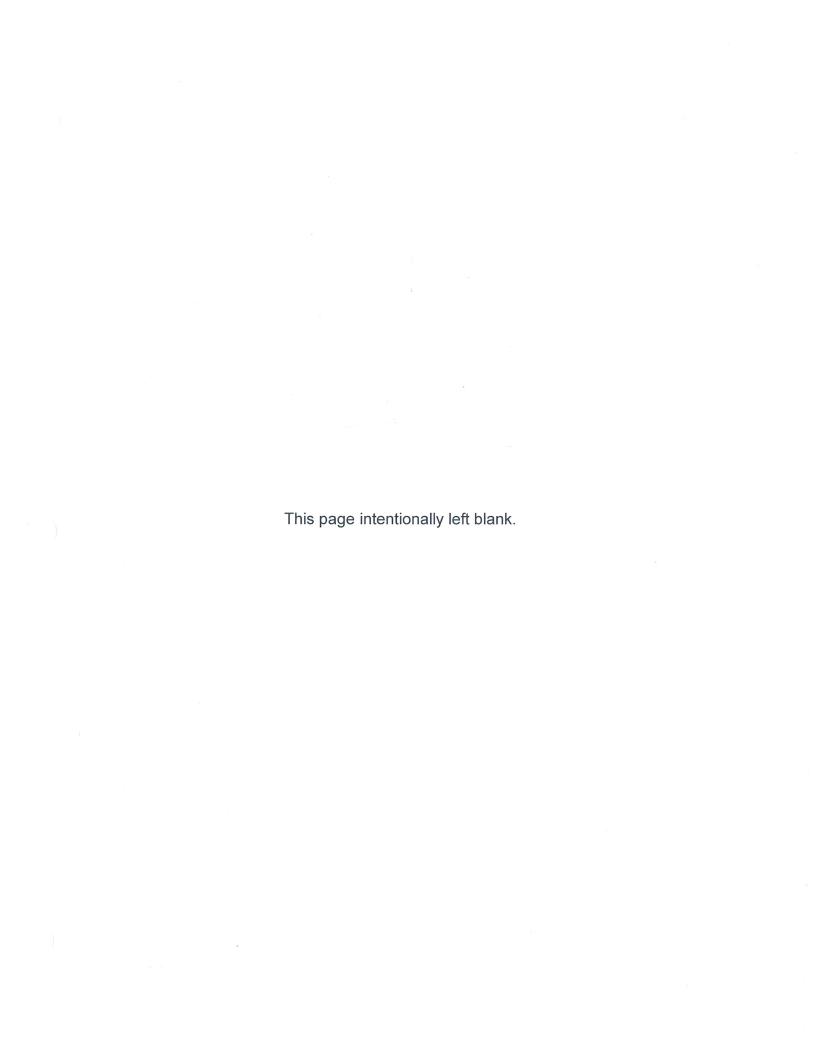
# Executive Order 13287: *Preserve America*Report to the Advisory Council on Historic Preservation

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ACHP	Advisory Council on Historic Preservation
AOH	Advisory Couries of Thistoric Frescribition

CPI Consumer Price Index

CRP Community Relations Program
CSRS Civil Service Retirement System

EFMS Web-Enabled Facilities Management System

EO Executive Order

FAP Federal Archaeology Program
FPO Federal Preservation Officer

FSO Facility Service Office

FSSP Facilities Single Source Provider
GAO Government Accountability Office

GSA General Service Administration

HPC Historic Preservation Coordinator

LSAP Leased Space Accessibility Program

MOA Memorandum of Agreement

NEPA National Environmental Protection Act

NHPA National Historic Preservation Act of 1966

NRIS National Register Information System

OMB Office of Management and Budget SHPO State Historic Preservation Officer

SOI Secretary of the Interior

THPO Tribal Historic Preservation Officer

TRAP Treasury Relief Art Project

USC U.S. Code

USPS U.S. Postal Service

WPA Works Program Administration

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# 1 Introduction

On March 3, 2003, President George W. Bush issued Executive Order (EO) 13287, *Preserve America*, reaffirming the commitment of the Federal government to fulfill its responsibilities under the National Historic Preservation Act of 1966 (NHPA), as amended (EO 13287 2003). EO 13287 was intended to improve Federal agency planning, accountability, and stewardship in regards to historic properties under the control of Federal agencies; to encourage agencies to explore partnerships to preserve and utilize these properties; to support the promotion of historic properties through heritage tourism and heritage education; and to promote the contribution of historic properties to local economies (ACHP 2006: 8-9).

To encourage Federal agency accountability, Section 3 of EO 13287 asked Federal agencies to report on their progress in meeting the goals of the EO. The first Section 3 Report was submitted by Federal agencies in 2004, with a follow-up progress report submitted in 2005 (EO 13287 2003: Section 3(a-c)). The EO asked that each Federal agency submit another report every 3 years thereafter. After Federal agencies submit their reports to the Advisory Council on Historic Preservation (ACHP) and the Secretary of the Interior (SOI), the ACHP will submit a triennial report to the President which summarizes the status of the Federal Government's historic properties and the recommendations provided to the Federal agencies (EO 13287 2003: Section 3(c)).

In accordance with EO 13287 reporting requirements, the U.S. Postal Service (USPS) submitted an initial report to the ACHP and the SOI in 2004, and a progress report in 2005 (USPS 2004 and 2005a). This 2008 EO 13287 report (2008 EO Report) is submitted to the ACHP by the Postal Service as the agency's first triennial report in compliance with EO 13287. The report addresses the informational requests contained in EO 13287, Section 3 (a)-(c) and Section 4 (a) and (b), and outlined by the ACHP in their 2007 guidance document for the implementation of this EO (EO 13287 2003: Section 3 (a-c) and Section 4 (a and b); ACHP 2007).

### This report includes:

- A description of the current status of the Postal Service's identification, protection, and use of historic properties
- A description of Postal Service policies and reporting requirements related to the identification, protection, and use of the historic properties owned or leased by the Postal Service
- Case studies that highlight the Postal Service's recent successes and opportunities associated with their historic properties
- A description of how the Postal Service's preservation program has progressed since the 2004 and 2005 Section 3 Reports
- Future Postal Service plans to improve the agency's preservation program

Steve Roth Manager

National Real Estate U.S. Postal Service

# 2 Methodology

Research, analysis, and report production for this 2008 EO Report were conducted according to the guidelines provided by the ACHP in 2007 and the reporting requirements outlined in EO 13287 (ACHP 2007; EO 13287 2003). Information collected and reviewed to complete this report included an examination of background materials and reports, internal interviews with the Postal Service personnel, the distribution of an internal questionnaire to key Postal Service personnel, and research using a variety of sources external to the Postal Service that provided information about Postal Service historic properties.

# 2.1 Background Research

Background research involved a review of EO 13287, previous Postal Service EO 13287 reports submitted to the ACHP in 2004 and 2005 (2004 EO Report and 2005 EO Report), ACHP 2007 reporting guidelines for the EO 13287 2008 report, online Postal Service publications and documents concerning agency policies and standard procedures, and other Federal agency reports commenting on Postal Service finances and operations, including reports from the Government Accountability Office (GAO) and the Office of Management and Budget (OMB). All document, reports, and online resources consulted for this research are listed in Section 9: References.

# 2.2 Internal Postal Service Research

Postal Service personnel and/or contractors provided additional information for this report. A data call questionnaire was created based on previous Postal Service EO reports and the ACHP 2007 guidelines. The questionnaire was submitted to the Postal Service Federal Preservation Officer (FPO) and to the designated historic preservation coordinators and/or contractors responsible for overseeing historic properties at Postal Service Facility Service Offices (FSOs). Additional interviews were conducted with Postal Service employees and/or contractors concerning the Postal Service's archaeology program, the history and management of collections related to documenting the institution's history, internal database (EFMS – Web-Enabled Facilities Management System), and the Leased Space Accessibility Program (LSAP). Interviews were conducted with the following Postal Service employees: the Postal Service Historian, Ms. Megaera Ausman; the LSAP Coordinator for the Northeast FSO, Ms. Barbara Dagenais; a facilities program analyst, Ms. Rose Letourneau; an archaeologist and facilities environmental specialist contracted to the Postal Service, Mr. James M. Ruffing; and the Postal Service FPO, Mr. Dallan Wordekemper.

# 2.3 Additional Research

Because the Postal Service's internal real property database, the electronic Facilities Management System (eFMS), has not been updated in an ongoing manner, information concerning the total number of Postal Service properties listed in the National Register of Historic Places was obtained from the National Register's online database, the National Register Information System.

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# 3 The Postal Service Preservation Program

# 3.1 Agency Mission Statement and Background

The U.S. Postal Service (Postal Service) was established in 1775 by an act of Congress and was officially known as the Post Office Department (USPS 2006). In 1970, Congress passed the Postal Reorganization Act of 1970 (39 U.S. Code [USC] 101), which renamed the department and defined the Postal Service as an independent establishment of the Federal government with the mission to "...have as its basic function the obligation to provide postal services to bind the nation together through the personal, educational, literary and business correspondence of the people" (Postal Reorganization Act of 1970, Public Law 91-375). The 1970 act required the Postal Service to operate in a "businesslike manner" and to generate sufficient revenue through sales to pay for its costs and to strive to "break even" (Postal Reorganization Act of 1970, Public Law 91-375). At the time of the 1970 reorganization, the Postal Service acquired all currently operating postal facility properties from the General Service Administration (GSA), including all buildings, furnishings, and artwork.

The Postal Service found that meeting the requirements of the 1970 Act became increasingly challenging at the dawn of the twenty-first century due to weak mail volumes and rising labor and infrastructure-related costs. In recognition of the need to change the way it accomplishes its mission, the Postal Service issued the United States Postal Service Transformation Plan (the Plan) in 2002, which called for the evolution of the agency into a "Commercial Government Enterprise" (USPS 2002). The Plan directed the agency to transform itself into a more agile entity that maintains its universal service duties while also developing greater flexibility to operate in a businesslike manner. The Plan was produced at the request of the U.S. Senate, which grew concerned about the Postal Service's long-term ability to fulfill its universal service obligation in the wake of a report by the U.S. GAO that placed the Postal Service on its High-Risk List (GAO 2007a).

The GAO's audits and evaluations identify Federal programs and operations that are high-risk due to their greater vulnerabilities to fraud, waste, abuse, and mismanagement. In recent years, GAO also has identified high-risk areas to focus on the need for broad-based transformations to address major economy, efficiency, or effectiveness challenges. Through the GAO's identification of high-risk problems, the government has the opportunity to implement lasting solutions that could potentially save billions of dollars, dramatically improve service to the public, strengthen confidence and trust in the government's performance and accountability, and ensure the ability of the government to deliver on its promises (GAO 2007a).

On December 11, 2002, President George W. Bush issued Executive Order 13278: President's Commission on the U.S. Postal Service (USPS 2006). The President issued the EO in response to a March 2001 letter from the Postal Service Governors stating that "significant statutory reform was needed to continue to provide consistent, satisfactory, universal service to the American people" (USPS 2006:58). The ninemember bipartisan commission identified the operational, structural, and financial challenges facing the Postal Service; examined potential solutions; and charted a

course to build a healthy financial foundation. The commission produced a final report, Embracing the Future, submitted to the President in 2003 calling for the Postal Service to remain a public institution subject to broad oversight, to focus on universal mail service as its core value, to be guided by the best business practices, to overhaul the postal network, to clarify the postal monopoly, and to maintain a culture of excellence (USPS 2003a).

This process of internal agency analysis, combined with recommendations from a broad range of government officials, led to the comprehensive postal reform legislation approved by Congress in December 2006 (Postal Accountability and Enhancement Act of 2006, Public Law 109-435). The Postal Accountability and Enhancement Act (the Act) identified ways to address many of the financial, operational, and human capital challenges facing the Postal Service. The Act requires the establishment of a more efficient, flexible, fair, transparent, and financially sound Postal Service. Since its enactment key actions have been implemented to meet these requirements, including establishment of a new rate-setting system and regulatory agency; "prefunding" Postal Service retiree health benefit obligations; and the updating of customer service standards. Implementation of key elements of the Act led to GAO's decision to remove the Postal Service from its High-Risk List in 2007 (GAO 2008b).

### 3.2 Postal Service Preservation Policy

It is the policy of the Postal Service, by a resolution of the 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 (USPS 2000). Accordingly, the Postal Service will meet the general preservation goals and specific legal requirements set forth in the NHPA, the Public Buildings Cooperative Use Act, the Archeological Resource Protection Act, the Native American Graves Protection and Repatriation Act, and Executive Orders 11593 (Protection and Enhancement of the Cultural Environment), 12072 (Federal Space Management), 13006 (Locating Federal Facilities on Historic Properties in our Nation's Central Cities), and 13287 (Preserve America). All laws and acts are listed in Section 9: References.

In order to comply with applicable Federal laws, the Postal Service has developed standard requirements with respect to how agency personnel address historic properties as they carry out their specific responsibilities. 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) are the agency's internal guidebooks that outline Postal Service policy in regards to historic properties (USPS 2008; USPS 1997). Postal employees responsible for historic properties use these guides on a daily basis as tools for the management of facilities, including historic properties. The guides provide standard operating procedures and other information about how Postal Service employees will carry out their responsibilities to ensure compliance with cultural resource regulations. The following flow chart, included in Handbook RE-6, is an example of the types of specific cultural resource management guidance that is contained in these documents (USPS 1997: 49).

3-2 September 2008

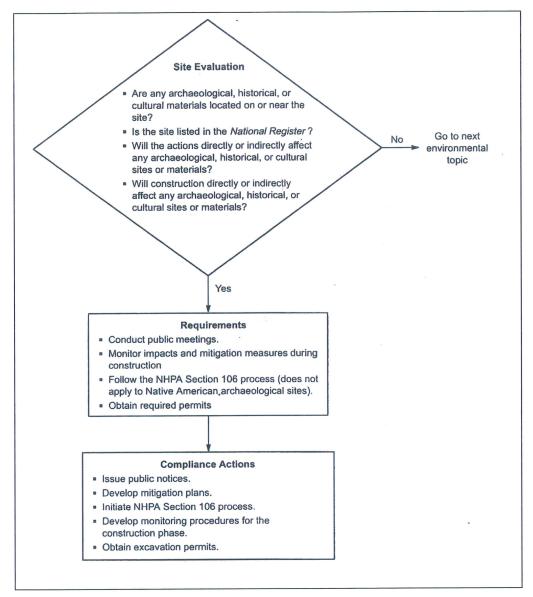


Figure 3-1: Historic and Cultural Resource Preservation Flow Chart from Facilities Environmental Guide (Handbook RE-6), p. 49

# 3.3 Postal Service Fiscal Constraints

A commercially viable and financially stable Postal Service remains vital to the American economy. In 2002 more than 7 million Americans visited post offices each day (USPS 2002). As of 2007, the Postal Service delivered more than 212 billion pieces of mail each year and collected nearly \$74 billion in annual revenue (USPS 2007: 3). The Postal Service was also a major employer with nearly 685,000 career employees, making it the third largest civilian employer in the Nation (USPS 2007: 3). Additionally, more than 1.8 million new delivery points were served by the postal network in 2007 (USPS 2007: 3).

Despite the comprehensive legislative reforms and stringent internal management efforts, the Post Service reported a \$5.1 billion net loss for fiscal year 2007, followed by

a revenue shortfall of \$1.1 billion in the third quarter of fiscal year 2008 (GAO 2008b; Wordekemper – e-mail August 12, 2008). These losses have been attributed to the national economic slow down that accelerated the reduction of mail volume, and to the continued inflation of fuel prices and rapidly escalating transportation costs. This uncertain economic environment serves to exacerbate the challenges facing the Postal Service and contribute to even lower mail volumes and revenues.

Another key financial constraint is the Postal Service's reliance on leased properties. In January 2008, the GAO released a report entitled *Federal Real Property: Strategy Needed to Address Agencies' Long-Standing Reliance on Costly Leasing*, which indicated that GSA and the Postal Service hold the majority of the Federal government's leased building space, totaling about 270 million square feet, or about 67 percent of the leased inventory space held by the Federal government within the United States and U.S. territories (GAO 2008a). The Postal Service leased 99,527,123 square feet of property in 2006 (GAO 2008a: 9).

The 2008 GAO report states that the majority of the Postal Service's leased buildings are used primarily for customer service post offices, and a portion of its building space is used for retail facilities and carrier annexes (GAO 2008). The GAO report examined 10 leases (seven GSA leases and three Postal Service leases) and found that it would be more cost-effective to own property, but the decision to lease was primarily driven by a limited availability of capital for property purchase and other considerations, such as operational efficiency and security (GAO 2008: 14).

The financial difficulties identified in the 2002 Transformation Plan and the President's 2003 report *Embracing the Future* are not cyclical phenomena that will fade with the economic recovery. The Postal Service's previous business model, based on the premise that increases in mail volumes will cover rising costs and mitigate rate increases, continues to be at risk because of growing competition from private companies, foreign postal operators, and technological alternatives, such as cell phones and the Internet.

The Postal Service has been actively addressing these significant challenges to its continued ability to ensure universal mail service at affordable rates. One approach outlined in the 2006 Act divided Postal Services market sectors into two broad categories: "Market-Dominant" and "Competitive." Market Dominant services include, but are not limited to, First Class mail, standard mail, and periodicals. Future rate increases for these services will be subject to a price cap based on the All Urban Consumers (CPI-U), which is a Consumer Price Index. Competitive Services, such as Priority Mail, Express Mail, Bulk Parcel Post, and Bulk International Mail will have greater pricing flexibility based on the need to stay competitive within the market niche (GAO 2008b:15). Additionally, the 2006 law made significant changes in respect to the funding of Civil Service Retirement System (CSRS) benefits and retiree health benefits, changes that will seek to address the agency's pressing need to identify ways to fund ever-increasing employee compensation programs (GAO 2008b:44).

# 3.4 Real Estate Management and Preservation Personnel

The structure of the Postal Service's preservation program has not changed since the 2005 EO Report (USPS 2005). One minor change was made to the organization of regional FSOs, with the Western FSO becoming responsible for Nevada and Arizona, States previously handled by the Pacific FSO (Wordekemper 2008).

### 3.4.1 Facilities Headquarters

The Postal Service's Facilities Headquarters, located in Arlington, VA, is responsible for overseeing all properties under the control of the Postal Service. Two persons at Facilities Headquarters, the Vice President of Facilities and the FPO, are responsible for overseeing historic properties (Wordekemper 2008).

### 3.4.1.1 Manager, National Real Estate

The Manager of National Real Estate is responsible for maintaining a complete inventory of all historic properties, including building, sites, and objects, under the control of the Postal Service.

#### 3.4.1.2Federal Preservation Officer

The Postal Service FPO is responsible for responding to all comments and inquiries regarding historic properties, reviewing and approving Section 106 reports, preparing nominations to the National Register of Historic Places (National Register), and creating preservation, restoration, relocation, and maintenance plans for buildings, sites, and objects (Wordekemper 2008). The FPO also approves all Building Disposition Plans and Artwork Retention Plans and authorizes loan agreements for items in the New Deal Arts Programs Collection. This is not currently a full-time position.

#### 3.4.2 Postal Historian

The Postal Historian is part of the Legislative Policy and Strategy Development department under the Government Relations division of the Postal Service, and reports to the Senior Vice President of that division. The Postal Historian is responsible for overseeing the preservation of Postal Service history. The Postal Historian is responsible for Postal artifacts, photographs, records, and non-New Deal Arts Collection artworks, including the disposition of these items. This is a full-time position.

#### 3.4.3 Facilities Service Offices

#### 3.4.3.1Historic Preservation Coordinator

The Historic Preservation Coordinator (HPC) is the regional staff person responsible for conducting inspections of historic buildings, sites, and objects within their region, initiating consultation with the State Historic Preservation Officers (SHPOs), assisting with National Register nominations, and preparing preservation, restoration, relocation, and maintenance plans (Wordekemper 2008). The HPC also prepares all Building Disposition Plans and Artwork Retention Plans for submission to the FPO. This is not currently a full-time position in any of the eight regions.

#### 3.4.3.2FSO Organization

The Postal Service has divided the United States into eight regions, each of which is served by an FSO (Figure 3-2). The FSOs are responsible for managing all facilities within their region, and report directly to Facilities Headquarters. Each FSO has one staff member designated as the HPC for the region (Wordekemper 2008).

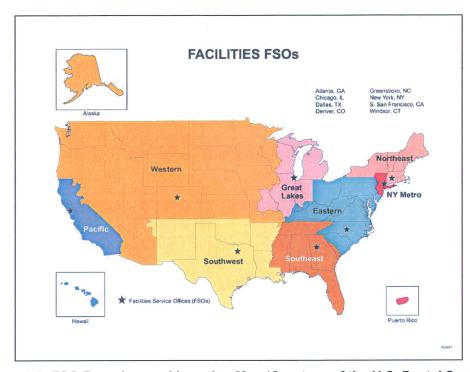


Figure 3-2: FSO Boundary and Location Map (Courtesy of the U.S. Postal Service)

Each of the eight FSOs is responsible for a specific geographic region (Wordekemper, e-mail, August 6, 2008):

- The Northeast FSO contains the States of Maine, New Hampshire, Vermont, Massachusetts, Connecticut, Rhode Island, and 80 percent of New York, containing the western and northern portions of the State.
- The New York Metro FSO contains the remaining 20 percent of New York State, consisting primarily of metropolitan New York City; 50 percent of New Jersey, consisting of the northern portion of the State; and the Commonwealth of Puerto Rico.
- The Eastern FSO contains the States of Pennsylvania, Ohio, Delaware, Maryland, West Virginia, Virginia, Kentucky, North Carolina, the District of Columbia, the remaining 50 percent of New Jersey, 20 percent of Indiana containing the southern tip of the State, and 90 percent of South Carolina containing everything but the land along the border with the State of Georgia.

- The Southeast FSO contains the States of Tennessee, Mississippi, Alabama, Georgia, Florida, and the remaining 10 percent of South Carolina located along the border with Georgia.
- The Great Lakes FSO contains the State of Michigan, the remaining 80 percent
  of Indiana containing the northern portion of the State, 50 percent of Wisconsin
  containing the eastern portion of the State, 95 percent of Illinois containing
  everything but the northwest corner of the State, and 50 percent of Missouri
  containing the northeast corner of the State.
- The Southwest FSO contains the States of Arkansas, Louisiana, Oklahoma, Texas, New Mexico, and 5 percent of Arizona containing the Four Corners region of the State.
- The Pacific FSO contains the States of California and Hawaii.
- The Western FSO contains the States of Alaska, Washington, Oregon, Idaho, Montana, Nevada, Colorado, Wyoming, Utah, North Dakota, South Dakota, Nebraska, Kansas, Minnesota, Iowa, the remaining 95 percent of Arizona containing the majority of the State, the remaining 50 percent of Wisconsin containing the western portion of the State, the remaining 5 percent of Illinois containing the northwest corner of the State, and the remaining 50 percent of Missouri containing the western and southern portions of the State.

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# 4 Identification of Historic Properties

Section Four provides an update on the number and types of historic properties that are currently owned or managed by the Postal Service. The section also discusses the agency's policies and procedures for complying with Section 110 of NHPA and EO 13287. The Postal Service utilizes the National Register's definition of historic properties in classifying the major categories of its properties. The National Register's definition of historic properties includes "significant properties, classified as buildings, sites, districts, structures, or objects" (National Park Service 1997:4). The Postal Service does not apply the standards outlined by the Federal Accounting Standards Advisory Board in defining major categories of its historic assets (Statement of Federal Financial Accounting Standards 29 - Heritage Assets and Stewardship Lands 2005).

# 4.1 <u>Composition and Distribution of Postal Service Historic</u> <u>Properties</u>

The Postal Service's real property database, eFMS, identifies buildings, including historic buildings, and items from the New Deal Arts Collection that are located within Postal Service buildings, some that may be considered objects by the National Register classification system. Information about other historic properties under the National Register classification system, including sites, districts, structures, and objects other than the New Deal Arts Collection, is not entered into the Postal Service real property database.

# 4.1.1 Buildings

# 4.1.1.1Composition

The Postal Service owns or leases a total of 36,754 buildings, with 8,893 buildings being owned and 27,861 buildings being leased (Figure 4-1, National Register Information System, Online database). Of these 36,754 buildings, 2,998, or 8 percent, are considered historic (Figure 4-2). These historic buildings include properties either listed in the National Register or determined eligible for listing in the National Register. The Postal Service classifies a building that is 50 years or older as eligible for listing in the National Register whether or not it has received a formal determination of eligibility through consultation with the SHPO or Tribal Historic Preservation Officer (THPO). Comparison of current statistics with the data provided in the 2004 EO Report suggests that the total number of buildings currently owned and leased by the USPS has increased by 1,750, or 5 percent, since 2004 (USPS 2004).

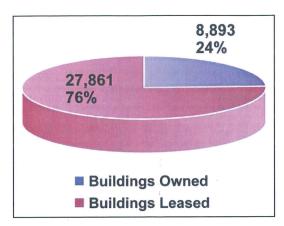


Figure 4-1: Buildings Owned or Leased by the Postal Service

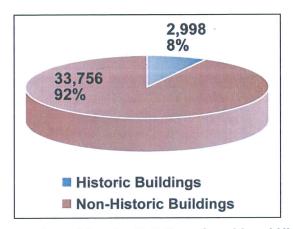


Figure 4-2: Postal Service Buildings Considered Historic

Of the historic buildings owned by the Postal Service, 1,086 (36.22 percent) are listed in the National Register, while the remaining 1,912 historic buildings are eligible for listing (Figure 4-3, National Register Information System, Online database).



Figure 4-3: Historic Postal Service Buildings Listed in and Eligible for Listing in the National Register

The Postal Service's real property database, the eFMS, does not contain a current number of historic properties listed in the National Register, because Postal Service personnel do not revise the database in an ongoing way due to a lack of available time (data concerning the number of historic properties <u>eligible</u> for listing in the National Register <u>was</u> available from eFMS because that data is based on the age of a property). For this report, the current number(s) of Postal Service properties listed in the National Register was obtained from the online National Register Information System (NRIS) database.

#### 4.1.1.2Historic Building Distribution

The majority of the historic buildings owned and leased by the Postal Service are found in the Pacific FSO, (21 percent), Western FSO (20 percent), and Great Lakes FSO (17 percent, Figure 4-4). California contains the majority of the eligible historic buildings in the Pacific FSO. The Western FSO contains 19 States, some of which are low-density States, including Colorado, Montana, Oregon, Wyoming, and Alaska. As discussed earlier in this report, two new States—Nevada and Arizona—have been added to the Western FSO since completion of the 2005 EO Report (USPS 2005a). Illinois contains the majority of eligible historic buildings in the Great Lakes FSO.

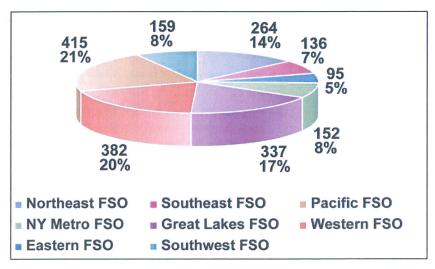


Figure 4-4 Historic Postal Service Buildings by FSO

The Eastern FSO (5 percent) and Southeast FSO (7 percent) have the fewest eligible historic buildings reported in the database.

#### Northeast FSO

The Northeast FSO contains the States of Maine, New Hampshire, Vermont, Massachusetts, Connecticut, Rhode Island, and 80 percent of New York containing the western and northern portions of the State.

The Northeast FSO contains a total of 540 historic buildings (Table 4-1). The total number of historic buildings includes buildings that have been determined eligible for

listing in or listed in the National Register. The New York State portion of this FSO contains 234 historic buildings, which is the highest number of historic buildings found in the Northeast FSO.

**Table 4-1: Northeast FSO Historic Buildings** 

State	Total Number of Historic Buildings
CT	58
MA	133
ME	51
NH	30
NY (80%)	234
RI	12
VT	22
Total	540

Rhode Island is the State with the fewest number of historic buildings in this FSO, with only 12 historic buildings determined eligible for listing on the National Register.

The historic buildings listed in or eligible for listing in the National Register within the Northeast FSO are shown in Figure 4-5. Within the Northeast FSO, there is a larger number of historic buildings listed in the National Register (276 properties) than that the number eligible for listing (264 properties). Of the 234 historic buildings in New York, 140 are listed in the National Register. Rhode Island, with five buildings, has the fewest historic buildings listed in the National Register.

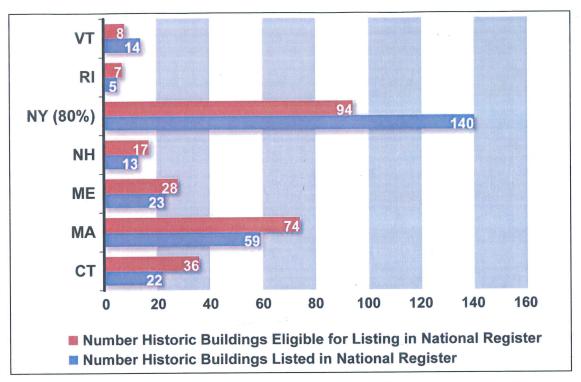


Figure 4-5: Northeast FSO Historic Buildings National Register Status by State

#### New York Metro FSO

The New York Metro FSO consists of a small geographic area containing the densely populated New York Metropolitan area (the area surrounding New York City and Northern New Jersey), the territory of Puerto Rico, and the Virgin Islands.

The New York Metro FSO contains a total of 194 historic buildings (Table 4-2). The total number of historic buildings includes buildings that have been determined eligible for listing in, or listed in, the National Register. The New York Metro FSO is geographically the smallest FSO in the United States. The New York portion of this FSO contains 126 historic buildings, which is the area with highest number of historic buildings found within the New York Metro FSO.

Table	4-2:	New	York	Metro	FSO	Historic	Buildings

State	Total Number of Historic Buildings
NJ (50%)	63
NY (20%)	126
PR	3
Virgin Islands	2
Total	194

The smallest numbers of historic buildings in this FSO are located in the territory of Puerto Rico and the Virgin Islands.

The historic buildings listed in or eligible for listing in the National Register within the New York Metro FSO are shown in Figure 4-6. Within the New York Metro FSO, the number of historic buildings eligible for listing in the National Register is larger than the number listed. Of the 126 historic buildings in New York, 91 are eligible for listing and 35 are listed in the National Register.

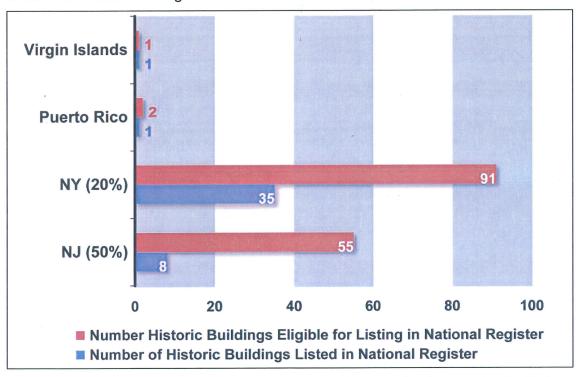


Figure 4-6: New York Metro FSO Historic Buildings National Register Status by State

#### Eastern FSO

The Eastern FSO contains the States of Pennsylvania, Ohio, Delaware, Maryland, West Virginia, Virginia, Kentucky, North Carolina, the District of Columbia, the remaining 50 percent of New Jersey, 20 percent of Indiana containing the southern tip of the State, and 90 percent of South Carolina containing everything but the land adjacent to the Georgia State border.

The Eastern FSO contains a total of 634 historic buildings (Table 4-3). The total number of historic buildings includes buildings that have been determined eligible for listing in or listed in the National Register. Pennsylvania contains 187 historic buildings, the greatest number of historic buildings among the Eastern FSO States.

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Table 4-3: Eastern FSO Historic Buildings

State	Total Number of Historic Buildings
DC	3
DE	8
IN (20%)	12
KY	56
MD	24
NC	56
NJ (50%)	26
ОН	115
PA	187
SC (90%)	12
VA	88
WV	47
Total	634

The historic buildings listed in or eligible for listing in the National Register within the Eastern FSO are shown in Figure 4-7. Within the Eastern FSO, most States have more eligible buildings than listed buildings, including: Delaware, Maryland, New Jersey, Ohio, Pennsylvania, South Carolina, and West Virginia. The District of Columbia and Delaware have the lowest number of historic buildings. The District of Columbia has two buildings listed on the National Register and one building eligible for listing. Delaware has two historic building listed in the National Register, as well as six buildings that are eligible for listing. Pennsylvania has the highest number of historic properties out of all the States within the Eastern FSO. Of the 187 historic buildings in Pennsylvania, 47 are listed in the National Register.

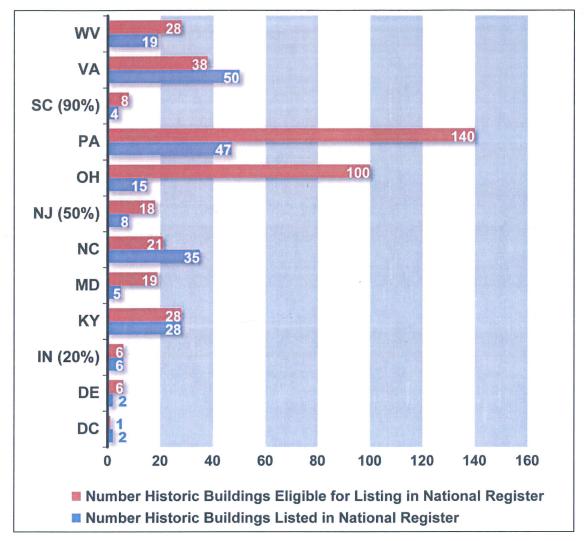


Figure 4-7: Eastern FSO Historic Buildings National Register Status by State

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#### Southeast FSO

The Southeast FSO contains the States of Tennessee, Mississippi, Alabama, Georgia, Florida, and the remaining 10 percent of South Carolina located along the border of Georgia.

The Southeast FSO contains a total of 256 historic buildings (Table 4-4). The total number of historic buildings includes buildings that are listed in or eligible for listing in the National Register. Georgia contains 69 historic buildings and is the State with the greatest number of historic buildings found in the Southeast FSO.

State	Total Number of Historic Buildings
AL	39
FL	31
GA	69
MS	62
SC (10%)	1
TN	54
Total	256

**Table 4-4: Southeast FSO Historic Buildings** 

The historic buildings listed in or eligible for listing in the National Register within the Southeast FSO are shown in Figure 4-8. Within the Southeast FSO, more historic buildings are eligible for listing in the National Register than formally listed. Of the 69 historic buildings in Georgia, 36 are listed in the National Register.

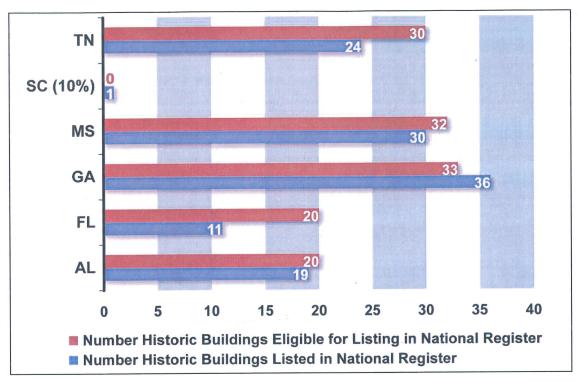


Figure 4-8: Southeast FSO Historic Buildings National Register Status by State

#### Great Lakes FSO

The Great Lakes FSO contains the State of Michigan, the remaining 80 percent of Indiana containing the northern portion of the State, 50 percent of Wisconsin containing the eastern portion of the State, 95 percent of Illinois containing everything but the northwest corner of the State, and 50 percent of Missouri containing the northeast corner of the State.

The Great Lakes FSO contains a total of 423 historic buildings (Table 4-5). The total number of historic buildings includes buildings that are listed in or eligible for listing in the National Register. The Illinois portion of this FSO contains 157 historic buildings, making it the State with the highest number of historic buildings found in the Great Lakes FSO.

State	Total Number of Historic Buildings
IL (95%)	157
IN (80%)	87
MI	89
MO (50%)	27
WI (50%)	63
Total	423

Table 4-5: Great Lakes FSO Historic Buildings

The State with the fewest historic buildings in this FSO is Missouri, which has 27 historic buildings.

The historic buildings listed in or eligible for listing in the National Register within the Great Lakes FSO are shown in Figure 4-9. Within the Great Lakes FSO, more historic buildings are eligible for listing than are listed in the National Register. Illinois has only 24 historic buildings listed in the National Register, while 133 are eligible for listing. Missouri has the fewest historic buildings listed in the National Register within this FSO.

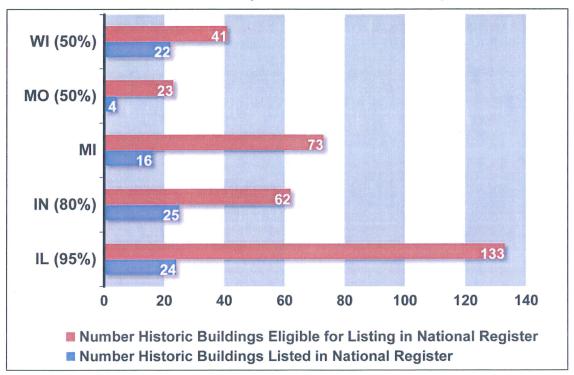


Figure 4-9 Great Lakes FSO Historic Buildings National Register Status by State

#### Southwest FSO

The Southwest FSO contains the States of Arkansas, Louisiana, Oklahoma, Texas, New Mexico, and 5 percent of Arizona containing the Four Corners region of the State.

The Southwest FSO contains a total of 220 historic buildings (Table 4-6). The total number of historic buildings includes buildings that have been determined eligible for listing in, or listed in, the National Register. Texas contains 94 historic buildings, which is the State with the highest number of historic buildings within the Southwest FSO.

State	Total Number of Historic Buildings
AR	33
AZ (5%)	0
LA	35
NM	8
OK	50
TX	94
Total	220

Table 4-6: Southwest FSO Historic Buildings

The area with the fewest historic buildings in this FSO is Arizona, with no historic buildings listed in or eligible for listing in the National Register.

The historic buildings listed in or eligible for listing in the National Register within the Southwest FSO are shown in Figure 4-10. Within the Southwest FSO, more historic buildings are eligible for listing than are listed in the National Register. Of the 94 historic buildings in Texas, 19 are listed in the National Register.

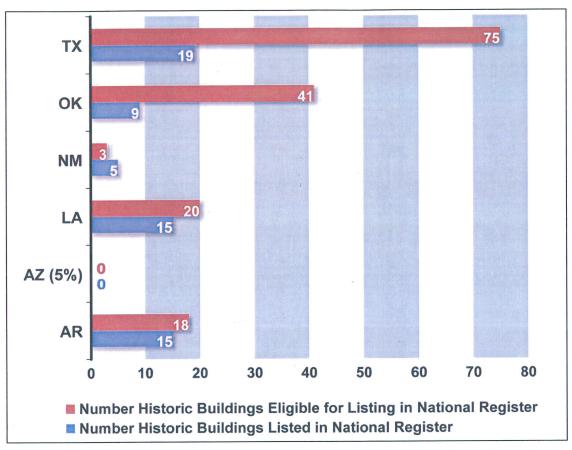


Figure 4-10: Southwest FSO Historic Buildings National Register Status by State

#### Pacific FSO

The Pacific FSO contains the States of California (a small portion of the northeast corner of the state is located within the Western FSO) and Hawaii.

The Pacific FSO contains a total of 127 historic buildings (Table 4-7). The total number of historic buildings includes buildings that have been determined eligible for listing in or listed in the National Register. California contains 125 historic buildings and is the State with the highest number of historic buildings found in the Pacific FSO.

State Total Number of Historic Buildings

CA 125

HI 2

Total 127

Table 4-7: Pacific FSO Historic Buildings

The State with the fewest historic buildings in this FSO is Hawaii, with only two historic buildings. Hawaii is the smallest State within the Pacific FSO, with a land area of 6,423 square miles, requiring fewer buildings to meet the needs of the public.

The historic buildings listed in or eligible for listing in the National Register within the Pacific FSO are shown in Figure 4-11. Within the Pacific FSO, more historic buildings are eligible for listing than are listed in the National Register. Of the 125 historic buildings in California, 34 are listed in the National Register.

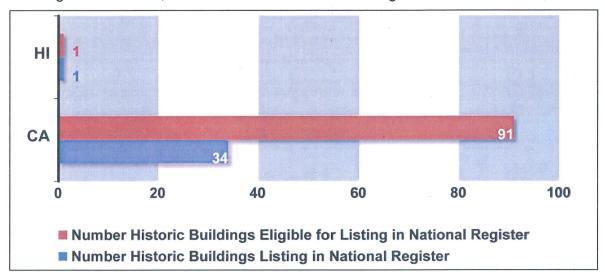


Figure 4-11: Pacific FSO Historic Buildings National Register Status by State

#### Western FSO

The Western FSO contains the States of Alaska, Arizona, Colorado, Idaho, Iowa, Kansas, Minnesota, Montana, Nebraska, Nevada, North Dakota, Oregon, South Dakota, Utah, Washington, Wyoming, the remaining 50 percent of Wisconsin containing the western portion of the State, the remaining 5 percent of Illinois containing the northwest corner of the State, and the remaining 50 percent of Missouri containing the western and southern portions of the State. The Western FSO also contains a small portion of the northeast corner of California (please see the Pacific FSO for California statistics).

The Western FSO contains a total of 602 historic buildings (Table 4-8), which is the second largest number of historic buildings found within an FSO. The total number of historic buildings includes buildings that have been determined eligible for listing in or listed in the National Register. The State of Kansas contains 74 historic buildings and is the State with the highest number of historic buildings found in the Western FSO.

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**Table 4-8: Western FSO Historic Buildings** 

State	Total Number of Historic Buildings
AK	2
AZ	15
CA	*
CO	44
IA	68
ID	27
IL (5%)	6
KS	74
MN	46
MO (50%)	33
MT	27
ND	23
NE	50
NV	12
OR	23
SD	22
UT	19
WA	52
WI (50%)	32
WY	27
Total	602

\*See Western FSO.

The fewest number of historic buildings in this FSO are located in the section of Illinois.

The historic buildings listed in or eligible for listing in the National Register within the Western FSO are shown in Figure 4-12. Within the Western FSO, more historic buildings are eligible for listing than are listed in the National Register.

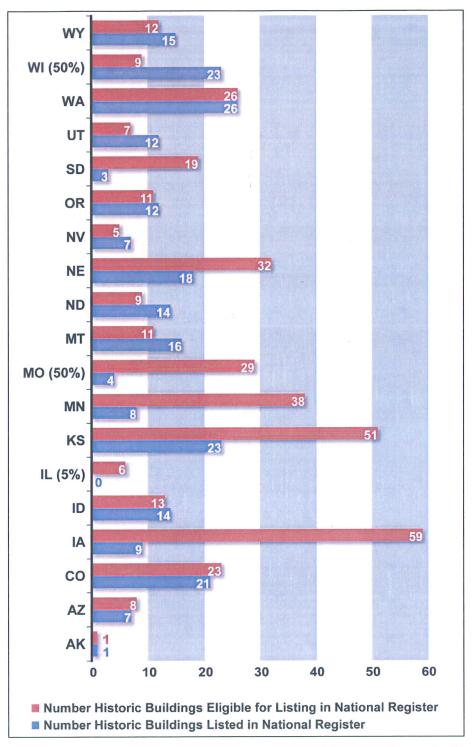


Figure 4-12: Western FSO Historic Buildings National Register Status by State

### 4.1.2 Reporting Mechanisms and Systems

The following reporting systems are used to document changes in the condition and status of the Postal Service's historic resources.

### 4.1.2.1Facilities Management System Database

Information about historic buildings is contained within the eFMS database, which is the Facilities Department's primary real property recordkeeping system. The database has recently been Web-enabled, which ensures greater accuracy and accessibility to all postal employees. This database contains information on all owned and leased facilities and is accessible to all authorized facilities staff (Letourneau 2008). The database includes the postal identification number, location, address, date of occupation, current building status (owned, leased, occupied, or vacant), National Register status (listed in the National Register or considered eligible for listing in the National Register, based on the fact that the building is 50 years or older), and an image of each historic building. The data set also notes whether an item from the New Deal Arts Collection is located within the building.

When a project is scheduled to occur at a historic property, the property information in the eFMS is reviewed and used to complete a Postal Service Form 4902, *Historic, Architectural, and Archeological Significance Survey.* If there are discrepancies identified at that time, the HPC or FPO can correct the information in the eFMS. The eFMS system is also continually updated by facilities personnel based on information collected during the maintenance, acquisition, and disposition of property. The historic status section of the database is reviewed and updated with each project.

### 4.1.2.2Federal Archaeology Program Report

The FPO completes an annual questionnaire describing the Postal Service's archaeological activities during the fiscal year for submission to the SOI, as required by the Archaeological and Historic Preservation Act (Archaeological and Historic Preservation Act 1974). This report is known as the Federal Archaeology Program (FAP) Report (National Park Service, FAP Web site). This information is included in the SOI's annual report to Congress on Federal archaeological activities.

#### 4.1.2.3New Deal Arts Collection Database

In addition to the eFMS system, the Postal Service maintains a database containing information on the New Deal Arts Collection at Facilities Headquarters. 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 approximately 80 percent of the entries, a historic image of the artwork. This database is only accessible by the FPO, and requests for information from it are forwarded to that individual by FSO HPCs, Postmasters, or members of the community.

### 4.1.2.4Facilities Single Source Provider

The Postal Service's newest tracking system for its buildings, the Facilities Single Source Provider (FSSP) system, went online at the end of FY05. As reported in the 2005 EO Report, the FSSP system enables the Postal Service to track maintenance

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needs and costs for all facilities, including historic buildings. The FSSP system is a standalone system that uses available facility information from EFMS but it does not connect to or replace eFMS.

It is hoped that in the future, the FSSP system will incorporate building inspections and condition assessments into its information tracking system, thereby enabling the Postal Service to keep track of system life cycles, maintenance issues, and costs leading to better long-term budgeting for the maintenance and management of all Postal Service facilities, including those with historic buildings.

# 4.1.3 Archeological Properties

The Postal Service does not maintain an inventory of archaeological properties or sites that are located within the boundaries of facilities that are owned or leased by the agency (Ruffin 2008). Similarly, the Postal Service does not maintain a record of recovered or lost artifacts or have a procedure to review and update archaeological data. Information concerning the nature of archaeological investigations carried out by the Postal Service is reported by the FPO to the SOI each year in the FAP Report that describes archaeological activities conducted by the agency (Wordekemper 2008).

The most recent information available online from the National Park Service FAP indicated that in 2005 the following archaeological activities were carried out by the Postal Service. The locations of these activities were not identified by State or FSO (National Park Service, FAP).

- 26 field studies were conducted
- 520 acres were inventoried
- 5 archaeological sites were identified
- 6 archaeological sites were determined eligible for the National Register
- · 2 data recovery projects were conducted
- 2 data recovery sites were identified
- 11 projects were curated
- 1 project is held within a Federal repository

# 4.1.4 Structures, Sites, Districts, and Objects

The National Register recognizes four categories of historic properties in addition to buildings: structures, sites, districts, and objects. The term structure is used to distinguish those functional constructions made for purposes other than creating human shelter (National Park Service 1997: 4). A site is the location of a significant event where the location itself possesses value, regardless of the value of any existing structure. This may include archaeological sites or a variety of above-ground sites. The Postal Service does not identify or categorize the location of structures or sites in its property holdings in eFMS. In addition, the Postal Service does not identify whether or

not its owned or leased properties are within National Register or other designated historic districts.

An "object" is a term used to distinguish those constructions that are primarily artistic in nature, or are relatively small in scale and simply constructed, according to the National Register. Although it may be, by nature or design, moveable, an object is associated with a specific setting or environment (National Park Service 1997: 5). Examples of objects that may be located on Postal Service properties include monuments, fountains, sculpture, or statuary. The Postal Service has also classified historic furnishings, such as desks and postboxes, along with vehicles, artworks (other than items from the New Deal Arts Collection), photographs, and papers as historic objects under the control of the Postal Historian.

The Postal Service described its policies and procedures for managing objects under its purview in the 2005 EO report (USPS 2005a: 4-3). The FPO and Postal Historian have shared responsibilities to determine how objects are protected and managed, and for their dispossession, if a Postal property that contains such an object will no longer be maintained by the agency.

#### 4.1.5 Artifacts

Artifacts are not a National Register category of historic property, but the Postal Service is responsible for many objects of various kinds that fall within that category. An artifact is defined as any manually portable product of human workmanship, including tools, weapons, ceremonial items, art objects, etc. (King 2005: 20). The Postal Service collects and curates a majority of its artifacts at the National Postal Museum. The museum, which is part of the Smithsonian Institution, was created in 1990 in a joint agreement between the Smithsonian Institution and the Postal Service, and is dedicated to the preservation, study, and presentation of postal history and philately (the study and collection of postage stamps). The National Postal Museum receives funding through three primary sources: the Postal Service, the Smithsonian Institution's annual Federal appropriation, and gifts from private individuals, foundations, and corporations (The National Postal Museum).

A new database to catalog Postal Service artifacts, called MIMSY-XG, was created and launched in January 2008 at the National Postal Museum (Ausman 2008). This database was created through the transfer of information from previous and outdated databases. The database is not linked to the Postal Service's real property database, eFMS.

#### 4.1.6 New Deal Arts Collection

The New Deal Arts Collection is a valuable and historically significant asset owned and controlled by the Postal Service. 1,309 murals and 332 sculptures were commissioned for post offices across the country from 1934 to 1943 under President Franklin D. Roosevelt's New Deal Arts Program. As of 2005, 1,206 murals and 314 sculptures of the 1,645 artworks originally commissioned were believed to be extant (USPS 2005a). These murals and sculptures are a vital part of America's national heritage as they compose the only comprehensive public art collection portraying the culture and character of the American people in a specific time period.

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The New Deal Arts Collection consists of those murals and sculptures commissioned from 1934 to 1944 specifically for postal facilities under the Treasury Department Section of Painting and Sculpture, Section of Fine Arts, and the Treasury Relief Art Project (TRAP). The collection does not include artwork commissioned for postal facilities outside of this time period or for other programs, architectural elements from buildings constructed from 1934 to 1944, or decorative elements, such as unique fixtures and furnishings (Postal Service Web site).

### 4.1.6.1Data Collection

As was reported in the 2005 EO Report, information about the New Deal Arts Collection is contained within a database and paper files at Facilities Headquarters that are the primary recordkeeping systems for the collection (Wordekemper 2008). The database was developed in 2002 and has been maintained by the FPO. The database is the FPO's primary tool to track artwork and to provide assistance to post offices around the country as they seek to maintain their part of the collection.

### 4.1.7 Historic Property Identification and Evaluation Policies

Policies concerning historic properties and related Postal Service responsibilities are outlined in the Postal Service guidance documents: Handbook RE-1, *Realty Acquisition and Management* (updated June 2008), and RE-6, *Facilities Environmental Handbook*. These documents describe Postal Service procedures regarding cultural resources, including compliance with the Section 106 process, identification and evaluation of historic properties, preparation of National Register nominations, and disposition of items from the New Deal Arts Collection. These guidance documents are provided to Postal Service facilities employees via hardcopy and/or online via the Postal Service's internal network.

Postal Service policy related to the identification and evaluation of historic properties is carried out during Section 106 consultation processes for individual undertakings. There are no other Postal Service policies related to the identification and evaluation of historic properties. Additionally, the agency has not established goals for these purposes.

The Postal Service is challenged by its fiscal constraints and its ongoing efforts to modernize its procedures to better carry out its core mission, and is therefore presently unable to devote the necessary budget with which to carry out a comprehensive historic property identification and evaluation program, or to update the eFMS on a regular, full-time basis. Cultural resource responsibilities are carried out by staff at both the national level (FPO), and at the FSOs by personnel who have many job responsibilities in addition to their cultural resource management assignments. In addition, none of the nine positions (the FPO and the FSO HPCs) are filled by personnel who meets the SOI's Professional Qualification Standards (48 FR 22716) in the fields of Architectural History, Historic Preservation, or Archaeology (National Park Service 1983).

# 4.2 Partnerships: Identification and Evaluation

The Postal Service relies primarily on its employees to carry out its Section 106 consultation responsibilities, including the identification and evaluation of historic

properties, or contracts with qualified cultural resource consultants when necessary to supplement its staff or to complete its regulatory responsibilities. The Postal Service has not identified effective ways to implement the use of partnerships, such as with other Federal agencies, State government, local governments, and/or non-profits, to assist with the identification or evaluation of historic properties that the agency owns or that may be affected by its undertakings.

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# **5 Protection of Historic Properties**

The Postal Service has one of the country's largest collections of historic properties owned and operated by a Federal agency that are actively used on a daily basis for similar purposes. The Postal Service continues to work diligently to balance the stewardship and protection of these properties with the challenge of modernizing its facilities to meet its core mission—delivering the Nation's mail. Given its financial constraints, the Postal Service believes that the most fiscally prudent and efficient way to protect its collection of historic properties is to continue to use and maintain those historic properties that meet its mission, and to find new owners for those historic properties that don't meet the agency's mission—owners who will responsibly protect these properties in the future.

# 5.1 Types of Protection

The agency fully understands the requirements to protect its historic resources under Federal law, and that protection includes the development of a preservation program that insures that historic properties are managed and maintained in a way that considers their preservation (NHPA 1966: Section 110). Like other owners of historic properties, the Postal Service employs standard methods of protection for its historic properties including preservation, rehabilitation, and restoration when appropriate. And the Postal Service agrees with the ACHP, who wrote in their guide to this report that "[o]ften the most effective form of protection is to ensure the active use of a historic property (the most cost-effective approach to protecting historic buildings is to insure their continued active use)" (ACHP 2007).

Most historic post offices that remain in Federal ownership are located in small town centers or dense urban cores. When constructed, these downtown post offices were an essential component of an active commercial economy. Their importance was reflected in their design, and historic post offices were usually among the finest buildings in a community. The post office was often the primary architectural representative of the Federal government in smaller towns. As such, the post office has occupied a key role in community identity. While many historic post offices remain in operation, some have been replaced with newer buildings to accommodate rapid population growth and technological advances in the way the Postal Service accomplishes its mission.

Today, the Postal Service has a real estate portfolio that includes not only newer facilities, but a growing number of older properties that are in need of continuing repair and modernization in order to be functional (USPS 2003a: 97). In many cases, the Postal Service has elected to sell functionally obsolete or deteriorating post offices. In 2003, the President's Commission on the U.S. Postal Service strongly recommended that "local communities should be given every opportunity to assume local ownership and control of excess properties, whether through purchase or donation" (USPS 2003a: 97). The Postal Service has actively sought to identify new local owners for those properties that no longer meet its mission. In addition, the Postal Service is permitted to trade excess real property with other Federal entities through the U.S. government's purchasing and property management agency, GSA, and seeks to do so as its real estate managers prepare properties for sale or other dispossession.

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The location and size of historic buildings in the Postal Service's enormous real estate portfolio affect the potential for their continued use by the agency. Among the major reasons underlying the decision to vacate many historic properties is that the facilities lack sufficient square footage to be efficiently readapted and updated to meet growing service needs. In addition, the location of properties in dense urban environments often makes construction of large additions to accommodate contemporary functions impractical or financially infeasible (Wordekemper 2008).

Whenever feasible, the Postal Service maintains a presence in its historic buildings and downtown locations, often reducing operations in a building to a "station" or retail facility while transferring major operations to a new location that better serves the agency's mission, and finding new users for the vacated space (Wordekemper 2008). In some cases, such as the James A. Farley Building and Western Annex in New York City, or the Main Post Office in Memphis, TN, the agency will seek lease agreements to operate small retail facilities within these large buildings when they are transferred with protective covenants to new owners (Wordekemper 2008).

# 5.2 Historic Property Protection Policies

The Postal Service does not currently incorporate consideration of historic properties into the development of either agency-wide strategic plans or annual performance plans at the national or regional levels. When considering historic properties during capital planning activities, the Postal Service does not have specific performance criteria for historic properties. The core of the Postal Service's historic protection policy is to:

- Analyze the Postal Service's real estate holdings agency-wide and determine the most efficient use and reuse of all of its holdings, including historic properties
- Maintain its collection of historic properties (including historic buildings and structures, but also recognizing its responsibility to identify and maintain objects, districts, and sites) and rehabilitate them when necessary in accordance with Federal historic preservation requirements, including the SOI's Standards for the Treatment of Historic Properties (National Park Service 1992)
- Maintain and protect its collection of nationally-significant murals and artworks located in Post Offices nationwide
- Make every effort to ensure that when historic properties are transferred to new owners through disposition activities, they are transferred to owners who agree to preserve and maintain them via legal agreements including covenants and Memoranda of Agreement, as required by Section 106 of the NHPA.

# 5.3 <u>Transferring Ownership of Historic Buildings</u>

The Postal Service is aware of the requirements under Sections 110 and 106 of the NHPA to strive to maintain, reuse, and readapt its historic real estate, and when the need to transfer a property to a new owner arises, to ensure its legal protection in the future. The FPO works in conjunction with the Postal Service's Facilities and Real Estate departments to help identify historic properties for which redevelopment is the most problematic, either because of the nature of the property itself or its surrounding

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neighborhood or community, and to support Section 106 consultation efforts to avoid, minimize, or mitigate adverse effects that arise from the transfer.

When selecting a buyer or developer for a historic property, the Postal Service must find one who can afford to redevelop the property, has a redevelopment plan which retains the important historic characteristics of a property, and is willing to accept legal restrictions governing the redevelopment project. The Postal Service must find a balance between historic preservation and property disposal issues when making property sale decisions. It is often in the best interest of the Postal Service to retain ownership of a vacant or underutilized property until the surrounding neighborhood can support the sale and redevelopment of large buildings. In some cases, it can take several years for a neighborhood to become economically viable enough to support a sale. In the case of historic properties, the Postal Service's preference is to retain ownership for as long as it deems necessary in order to ensure the building's preservation and to protect the Postal Service's property interests.

The Postal Service has been successful in transferring large properties with protective preservation agreements to developers in New York (James A. Farley Building and Annex), and Memphis, TN (Main Post Office). In each of these cases, an enormous urban property formerly owned by the Postal Service has found a new and appropriate use that respects its historic significance and continues its economic viability and use in its community. A smaller Main Post Office building located in Annapolis, MD, in one of the country's most important National Historic Landmark districts, is an additional example of how the Postal Service seeks to transfer properties in a preservation-sensitive manner. This property has been redesigned to include an addition of housing condominiums, with the Postal Service owning the older, historic portion of the building through a condominium agreement. This plan was endorsed and approved by the local historic preservation commission and the SHPO.

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# **6 Use of Historic Properties**

This section describes the policies under which the Postal Service uses its historic properties. The Postal Service must use its historic properties in a manner that supports the agency's mission first and foremost. Given the fiscal constraints that have forced the agency to maximize efficiency in order to meet the business goals mandated by its most recent reorganization, the highest public benefit derived from Postal Service property is a result of how those assets are used to accomplish its mission. However there is a side benefit in that every community that is host to a postal facility derives significant economic benefits in terms of jobs, support of local citizens and businesses, and communication needs. The Postal Service understands that its historic properties play an important role in maintaining the economic vitality of every city and neighborhood in which it operates its facilities.

# 6.1 Condition of Historic Properties

The Postal Service does not evaluate the condition of its historic properties on an ongoing basis. Each postal facility manager is responsible for maintaining its property according to agency rules and procedures, but the Postal Service has not attempted to systematically analyze the condition of its historic building stock. It is the overall impression of the FPO that the physical condition of historic properties owned by the agency varies from somewhat poor to quite good. A more objective assessment is not possible due to the fact that condition assessments are not regularly completed for properties owned by the Postal Service.

However, over the past 2 years the agency has undertaken a condition evaluation of its leased properties. That study, the *Existing Leased Facility Accessibility Survey*, is in the process of documenting how each of the facilities leased by the Postal Service complies with Federal handicapped accessibility regulations (Dagenais 2008). The evaluation taking place at three different levels: 1. Facilities that are 6,000 square feet or less in size are assessed by the Postmaster; 2. Facilities that are 6,001 to 60,000 square feet in size are assessed by contracted firms; and 3. Facilities that are 60,001 square feet or larger are cooperatively assessed by contracted firms working with Postal Service architects and engineering staff. At the conclusion of this study, the Postal Service will have an understanding of the basic physical condition of these properties, in addition to knowing how they might best be renovated to meet accessibility regulations.

# 6.2 <u>Historic Property Use Policies</u>

The Postal Service seeks every opportunity to maintain operations in historic buildings. When evaluating how best to upgrade a property for efficiency or to meet contemporary needs, the Postal Service's priorities are:

- To determine if it is possible to expand the existing building footprint by constructing an addition; or
- · Determine the feasibility of relocating to an existing building; or
- Design and construct a new facility.

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Historic properties within a community are examined for both their availability and their ability to meet the Postal Service's needs. If a historic property will not contribute to the Postal Service's mission, the historic property is not selected for use and other alternatives are considered.

# 6.2.1 Section 111 of the National Historic Preservation Act

The Postal Service is aware of its responsibilities under Section 111 of the NHPA and seeks ways to find alternative uses for surplus historic properties (NHPA 1966: Section 111, 16 USC § 470h-3(a)). In the 2005 EO Report, the Postal Service described its process for disposing of properties after it analyzes potential uses and finds none within the agency. Historic properties planned for transfer, lease, or sale are identified by Postal Service Form 7425, Excess Real Property Report, in order that the National Register eligibility of the property and presence of items from the New Deal Arts Collection can be tracked. An additional Postal Service Form 4902—Historic, Architectural, and Archeological Significance Survey—is completed for those properties that have not been formally evaluated for eligibility.

# 6.2.2 Disposal of Postal Service Buildings

Properties in need of disposal are first offered to GSA. If that agency does not have a use for the property, the Postal Service next offers the space to prospective lessors or buyers in the following order:

- Other Federal agencies
- 2. State government agencies
- 3. County government agencies
- 4. Municipal government agencies
- Private sector

Upon selection of a transfer party, the Postal Service negotiates the terms and conditions of the sale or lease with the prospective owner or tenant. The contracts include clauses that protect historic building elements from removal, alteration, and/or destruction, and are designed to protect the building's most significant architectural elements. The contracts also require that the Postal Service continue ownership of New Deal Arts Collection items after the property transfer.

If the property that is being transferred to a party that is not a Federal agency is listed in, or eligible for listing in, the National Register, the Postal Service carries out Section 106 consultation as required under the NHPA. If it is determined by that consultation that the transfer will result in an adverse effect, the Postal Service will enter into a Memorandum of Agreement (MOA) with the SHPO and other appropriate consulting parties as required by Section 106 of the NHPA to identify appropriate ways to ensure long-term protection of the property after transfer. The MOA will require that protective covenants or a property easement is included as a legal requirement of the sale or transfer, to ensure protection of the property after it is transferred. The ACHP is notified of a property transfer by the Postal Service to another party if an MOA is developed under Section 106 of the NHPA.

The Postal Service will not lease or exchange a historic property to any party if the Postal Service determines that the proposed lease or exchange will not adequately insure the preservation of the historic property.

# 6.3 Partnerships and Community Relations

The Postal Service continues to involve community stakeholders through its Community Relations Program (CRP) during the planning phase of projects that include the sale or transfer of properties to new owners, as mandated by both the NHPA and the National Environmental Protection Act (NEPA). The CRP ensures that discussions with stakeholders, especially members of the local community, take place whenever a project affects the community (USPS 1998). Other stakeholders, including leasing or purchasing parties and regulatory agencies, are consulted under the appropriate procedures outlined in the NHPA and NEPA.

Public hearings are held in the community to provide local stakeholders with an opportunity to express concerns about the proposed project. Vacating Postal Service property—especially properties that represent the historic character of a community—is sometimes contentious, with competing interests that see the proposed changes from diverse vantage points. The Postal Service is committed to evaluating the needs of the community at large while balancing agency responsibilities to its mission as it makes its decisions about property disposition.

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# 7 Postal Service Preservation Case Studies

# 7.1 Post Office Building Rehabilitation

The Postal Service expends significant amounts of public funds each year to maintain and rehabilitate all of its properties, including historic buildings and associated historic properties. It is here that the agency makes it strongest commitment to protecting the historic properties currently owned and operated by the Postal Service. The following sections describe just a few of these rehabilitation projects.

### 7.1.1 U.S. Post Office Door Restoration: Yonkers, NY

Located at 79-81 Main Street, the two-story, Classical Revival Yonkers Post Office sits prominently in the downtown commercial core of the city, occupying an entire polygonal city lot. With its symmetrical composition, conservative ornamentation, and superior building materials, the building embodies the Federal government's fundamental building principles of the period, which emphasized functionality, economy, and uniformity of design. The site was acquired in 1919 and selected for its close proximity to the Yonkers train station in accordance with the Treasury Department's policy of locating Federal buildings near railroads to facilitate efficient transport of mail. Construction began in 1926 and was completed in 1927 with a total budget of \$520,000. The building was erected under the direction of James A. Wetmore, Acting Supervising Architect of the Treasury from 1915 to 1933. The sheer enormity of the building speaks to the significance of Yonkers as a highly-populated and well-established 20<sup>th</sup>-century urban center. The building retains a high level of integrity and is recognized and listed in the National Register because of its architectural significance (National Park Service 1986).

The original bronze-clad entrance doors of the Main Street façade, distinctive and significant architectural features of the building, had become badly deteriorated over time and subsequently difficult to operate. The gradual sagging of the doors caused the solder joints of the bronze cladding to fail, allowing water to infiltrate and rot the interior wooded core of the doors. The weight and decay of the doors added further stress to the framework and caused the already corroded steel fastening mechanisms and hinges to break.

Instead of replacing the doors in an effort, however misplaced, to save money, the Postal Service restored them. The original copper cladding of the doors was removed and retained. The wood core was recreated by utilizing original stabilized pieces, new wood comparable to the original, and restoration epoxies. The copper cladding was reinstalled to the repaired wood core and soldered along the original joint lines. Worn and damaged sections at the top and bottom of the doors were replaced with new bronze cladding. The door jambs were modified and reinforced to accommodate the repaired doors.

The rehabilitation of the Yonkers Post Office bronze doors not only reestablished a signature design feature of the building but retained, stabilized, and reused much of the original historic building fabric while successfully returning the doors to their original function and operability (Schramm 2008). The project is a good example of the Postal

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Service's commitment to protecting historic buildings and their most significant historic features, even if relatively small in comparison to the property as a whole.



Figure 7-1: Yonkers Post Office

(Photo Courtesy of George Schramm, New York FSO Historic Preservation Coordinator)



Figure 7-2: Yonkers Post Office
(Photo Courtesy of George Schramm, New York FSO Historic Preservation
Coordinator)

# 7.1.2 U.S. Post Office Building: El Dorado, AR

Located at 101 South Jackson Avenue in downtown El Dorado, AR, the El Dorado Post Office was built in the Neoclassical style and designed under the direction of James A. Wetmore, Acting Supervising Architect of the Treasury Department from 1915 to 1934. Completed in 1931, the 57,329 square foot building housed the U.S. Federal Court for the Western District, the U.S. Marshall's Office, in addition to the El Dorado Post Office (Gaughan 2008).

Window restoration in 2007 demonstrated how original windows can be restored to correct deteriorated and unsafe conditions while maintaining the historic integrity of the building. The project involved the restoration of 95 existing original windows, including removal, repair, and reinstallation of the primary window frames, the glass, and the original storm windows. The repairs entailed replacing small amounts of damaged glass, glazing compound replacement, caulking replacement, cleaning, and reinstallation of storm windows. It is estimated that 98 percent of the original materials were conserved (Gaughan 2008).

The building is still used as the downtown post office in El Dorado and is listed in the National Register of Historic Places as a contributing resource in the El Dorado Commercial Historic District (Gaughan 2008).

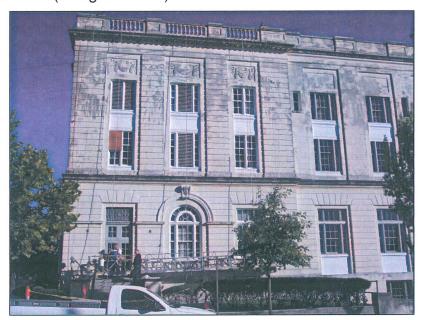


Figure 7-3: El Dorado Post Office Building (Photo Courtesy of Lisa Salas, Southwest FSO Historic Preservation Coordinator)

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Figure 7-4: El Dorado Post Office Building (Photo Courtesy of Lisa Salas, Southwest FSO Historic Preservation Coordinator)

# 7.2 Mural Restoration Projects

The Postal Service is proud to own, maintain, and protect one of the country's most significant collections of public artwork that tells the story of America through the eyes of artists during the Great Depression of the 1930s. These historic objects and artworks are among the agency's highest achievements in the historic preservation field. The Postal Service has devoted significant public funds to protect and restore these works of art when necessary. The following case studies, while certainly not exhaustive, provide several examples of projects that have taken place over the past 3 years.

Two Federal programs were responsible for the public artwork placed in post offices during this period. One program was created in 1934 as part of President Franklin D. Roosevelt's New Deal by the Procurement Division of the U.S. Treasury Department, the Section of Painting and Sculpture (often called "the Section"), and was dedicated to commissioning over 1,300 murals and 300 sculptures that were primarily placed in post offices throughout the country. Other artworks were created under the auspices of the Treasury Department's TRAP, which was established with a grant from the Works Program Administration (WPA) in 1935 to employ artists listed on the Federal relief rolls. Works from these programs were placed in public spaces—including post offices—so that all citizens would have access to the art. For the most part, large-scale murals were executed on subjects pertaining to national, State, or local history and culture (Park and Markowitz 1984: 6).

Over the years many of the murals have suffered from various forms of decay and deterioration. A lack of funding, knowledge, and/or expertise needed for conservation and/or restoration at the local level left these artworks in sad condition in many instances. In preparation for the celebration of the 75<sup>th</sup> Anniversary of the New Deal Program in 2008, the Postal Service has made a conscious effort to preserve this significant and historic art. Within the past 3 years, the Postal Service has successfully cleaned and/or restored 37 murals (Wordekemper e-mail September 5, 2008).

Preservation of the New Deal Art Collection is usually funded by the Postal Service in partnership with local communities. With conservation and restoration as the main objectives, the Postal Service and the local communities work to develop educational and informational materials for artwork located within Postal Service facilities (Schoenmann 2008). While it is the Postal Service's policy to keep these murals in their original locations, this is not always possible due to changes in the building's ownership and/or changes to the building as a result of new owners. The same is true for preservation of the murals. In most cases conservation and restoration is possible; however, when the condition of the mural results in a great loss of paint, some murals can only be documented.

The following mural restoration projects are among those for which communities partnered with the Postal Service in various ways in order to make the preservation of their murals a priority.

# 7.2.1 The Battle of Cranford During the American Revolution: Cranford, NJ

The Cranford Post Office, located at 3 Miln Street, Cranford, NJ, was constructed in the 1930s and received mural commissions shortly after its opening. Painted by Gerald Foster, *The Battle of Cranford During the American Revolution* is one of two murals erected here that depict an important event in the history of Cranford that also made a significant impact on national history, a battle that took place during the revolutionary war. At that time Cranford was a wealthy farming area located between the British Army headquarters on Staten Island, NY, and the Continental Army headquarters in Morristown, NJ (Schoenmann 2008). A second mural accompanying the battle scene is a mural of a man with a horse and cart, believed to represent Mr. Cran, an early farmer, from whom Cranford took its name. Awarded under TRAP funds, the murals were completed in 1937 in oil on canvas.

The Battle of Cranford During the American Revolution, the larger of the two murals, was divided in two sections during a post office renovation in 1972. Both murals suffered from deterioration that included paint loss. When the post office was renovated in 1972, the murals were restored with the most modern art restoration technology available at the time. Unfortunately, the technique and materials used for conservation proved to be harmful to the artwork in the long term. Recently, in a joint effort that included the Postal Service and the community of Cranford, the murals were restored. The restoration/conservation process took 6 months. During this time, the firm contracted to perform the restoration went through many processes to undo the operations that were performed in 1972. Following removal of the infill paint and the other hazardous materials, the painting was cleaned and restored.

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# 7.2.2 Post Office in the Country: New York, NY

Three frescos were originally commissioned for the 9<sup>th</sup> Avenue Lobby in the Farley Building Annex at West 33<sup>rd</sup> and 9<sup>th</sup> Avenue in New York City. Due to severe deterioration, by April 2003 only one remained extant. The mural entitled, *Post Office in the Country (*also known as *Ocean as a Link for Transportation*) was painted from 1936 to 1938 by Federico (Rico) Lebrun.

Because the Postal Service was in the process of transferring ownership of the building to a new owner, and Section 106 consultation required investigation of the mural to determine if it could be conserved, in November 2003 conservators commissioned by the Postal Service determined that there had been a paint loss of over 51 percent, leaving a severely damaged work of art that no longer appeared as it was originally conceived by the artist. Because of the level of deterioration and the lack of evidence to substantiate its original appearance, consultation under Section 106 of the NHPA between the Postal Service and the New York SHPO determined that the artwork was a poor candidate for either preservation or conservation, and that the best course of action would be to document the mural for future study, using accepted art conservation standards. That approach was agreed upon in an MOA and approved by the Postal Service, the New York SHPO, and the Empire State Development Corporation, the new owner of the building, in 2006 (URS/EG&G 2004).

The MOA included conservation specifications to document the fresco and stipulated that an appropriate archival repository in New York City would be identified to house the documentation. The final documentation included seven sheets of Mylar used to map the remaining artwork, including incision lines, and 42 photographs. In 2008, the New York Historical Society stepped forward to agree that it would take responsibility to archive the mural documentation, an example of how a private not-for-profit partnered with the agency to ensure protection of the last physical information about a significant work of art that could not be saved (Schoenmann 2008).



Figure 7-5: Documentation of the Frederico LeBrun mural located in the Farley Building Annex.

Photo courtesy of URS/ EG&G Corporation (October 2007)

# 7.2.3 A. Grignon Trading with the Indians: Kaukauna, WI

Unlike the majority of the fine art owned by the Postal Service, the mural *A. Grignon Trading with the Indians* is no longer displayed in its original location at 101 Oak Street in Kaukauna, WI. Painted by Vladimir Rousseff and 23 square feet in size, the mural was painted in oil on canvas for a fee of \$350 and installed on November 18, 1938. The mural represents the early settlement of Kaukauna, when Charles A. Grignon, a fur trader and early settler, operated a trading post in the 1830s from which he was able to trade with local Native American tribes such as the Menomini and Chippewa Indians (Charles A. Grignon Mansion Web site).

From 1988 to 2007 the original post office building has been used by the Kaukauna School District to house their administrative offices and, during this time, the school district served as a steward of the mural. In 2007, the school district offices relocated and, in turn, the Postal Service decided to move the mural to its new Kaukauna location at 120 Doty Street. A private conservation firm was hired to remove the mural from its original location and place it within the new post office. Following removal, the mural was conserved through an intense cleaning and application of appropriate protective coatings. An educational rededication ceremony was held at the new post office on May 7, 2008 (Schoenmann 2008).

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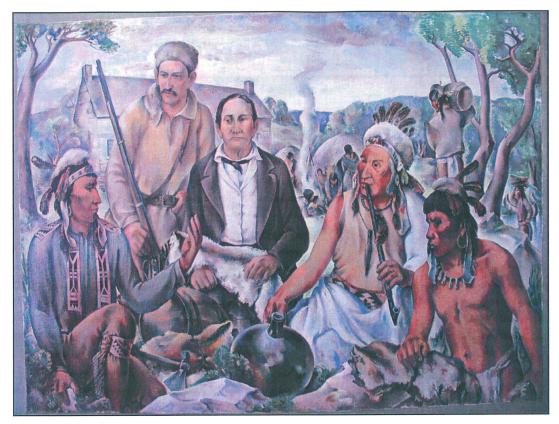


Figure 7-6: "A. Grignon Trading with the Indians" by Vladimir Rousseff
Photo courtesy of Parma Restoration, Chicago, IL

# 7.2.4 The Opening of the Cheyenne and Arapaho Country: Sayre, OK

The post office located at 201 North 4<sup>th</sup> Street, in downtown Sayre, OK, was completed in 1938 and designed in the Art Deco style under the direction of Louis A. Simon, Supervising Architect of the U.S. Government. Painted in oil on canvas by Vance Kirkland for \$750, the mural *The Opening of the Cheyenne and Arapaho Country* was added to the post office in the fall of 1940. The mural, which measures 12 feet by 5 feet and 5 inches, was placed in the lobby of the building above the entrance to the Post Master's office. Important to Oklahoma State and local history, the mural represents the opening of Native American tribal lands to white settlement. The Organic Act of 1890 designated specific portions of lands for the Native Americans as well as for the white settlers—Sayre, OK, was within the area designated for open settlement (Oklahoma Historical Society Web site).

Over the years the condition of the mural deteriorated due to water damage caused by the infiltration of water through the building's roof. The water damage caused the paint to separate from the ground layer of the canvas. In recognition of the 75<sup>th</sup> Anniversary of the New Deal Program in 2008, the mural was identified by the Postal Service as one of its most important pieces of public art in need of restoration. Restoration included consolidation of loose or flakey paint and correction of the loss of a number of pen points. The mural has been completely restored to its original condition (Schoenmann

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2008). As a result of the restoration, the Sayre Post Office received an award in 2008 from Oklahoma Main Street for the Best Public Improvement Project in the State (Wordekemper 2008).



Figure 7-7: "The Opening of the Cheyenne and Arapaho Country"

Photo courtesy of Parma Restoration, Chicago IL

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# 8 Summary

# 8.1 Status of Preservation Program Efforts

Since the 2005 EO Report, the agency's response to its fiscal challenges has been its primary focus. These challenges have not enabled the Postal Service to make substantive improvements to its preservation program. The Postal Service has, however, continued its strong commitment to protecting and conserving its New Deal Arts Collection and carrying out its Section 106 consultation responsibilities in an effective and comprehensive way.

#### 8.1.1 Postal Service Initiatives

The Postal Service has completed the following initiatives since completion of the 2005 EO 13287 progress report:

### 8.1.1.1 Handbook and Manual Updates

The Postal Service has completed the update of its procedural handbooks and manuals to correlate current Federal laws with existing Postal Service procedures and regulations. These revised handbooks will ensure that current regulations for protecting historic resources also correlate with Postal Service policies. The revised documents will be available to all Postal Service employees on the internal Postal Blue network.

The handbooks and manuals that were revised are:

- F-66, General Investment Policies and Procedures
- RE-1, Realty Acquisition and Management
- RE-5, Building and Site Security Requirements
- RE-12, Repair and Alteration Surveys
- RE-13, Repair and Alteration of Real Property Facilities
- RE-14, Design and Construction Handbook

#### 8.1.1.2Internal Education

The Postal Service continues to identify internal and external opportunities for cultural resource training for Postal employees. In May 2005, the Postal Service included two training sessions on cultural resource issues at its National Real Estate Conference. The sessions were attended by all of the conference attendees, a mix of Postal Service Facilities, Assets, and Real Estate employees along with Postal Service lease holders. The training is part of a larger effort to ensure that Postal Service employees at all levels have a basic understanding of the Section 106 process and an awareness of their cultural resource responsibilities as postal employees.

### 8.1.1.3 Historic Preservation Learning Portal

The Postal Service has been a financial supporter and active participant in development of the NPS Historic Preservation Learning Portal that provides preservation

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professionals with instant electronic access to 1000 federal, state, tribal, educational and non-profit preservation websites (National Preservation Institute 2008).

# 8.2 Preservation Program Issues

### 8.2.1 Staffing

The Postal Service does not currently have a full-time staff to address cultural resource issues. Both the FPO and FSO Historic Preservation Coordinators fill their positions on a part-time basis. None of the nine FSO positions are filled by an individual who meets the SOI's Professional Qualification Standards (48 FR 22716) in the fields of Architectural History, Historic Preservation, or Archaeology.

Due to the number and nature of the Postal Service's historic resources, and that the number of historic properties owned by the Postal Service is increasing as more Post Offices become 50 years of age, this is an issue that will need to be addressed in the near future.

### 8.2.2 Budget

The most pressing issues that affect the maintenance and preservation of the Postal Service's historic resources are the lack of a dedicated funding source for the agency's cultural resource program, and the anticipated budget deficit in the coming fiscal years. This is an agency-wide issue and part of a larger fiscal shortfall that the Postal Service is working to address.

# 8.3 Future Preservation Program Plans

The Postal Service plans to undertake the following cultural resource projects through September 2008.

# 8.3.1 Improved Reporting Methods

The Postal Service will develop an internal database to collect information on Section 106 consultations, archaeological resources, and artwork restorations. The information collected will be used to facilitate the completion of FAP and future EO 13287 reports.

#### 8.3.2 Preservation Education

The Postal Service will continue its publication of the *Postal Preservation* newsletter, with future issues providing updated information about cultural resource programs and regulations and addressing emerging Postal Service cultural resource issues.

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