

Executive Order 13287

Preserve America

Report to the Advisory Council on Historic Preservation

December 2011

Submitted by

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475 L'Enfant Plaza, SW
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EXECUTIVE ORDER 13287: *PRESERVE AMERICA*

REPORT TO THE ADVISORY COUNCIL ON HISTORIC PRESERVATION

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UNITED STATES POSTAL SERVICE
FACILITIES HEADQUARTERS
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Appendix A: Inventory of Historic and Possibly Historic Buildings by State

ACHP	Advisory Council on Historic Preservation
CPI	Consumer Price Index
CRP	Community Relations Program
CSRS	Civil Service Retirement System
eFMS	electronic Facilities Management System
EO	Executive Order
EM	Electromagnetic
FAP	Federal Archaeology Program
FOIA	Freedom of Information Act
FPO	Federal Preservation Officer
FSO	Facility Service Office
FSSP	Facilities Single Source Provider
GAO	Government Accountability Office
GPR	Ground Penetrating Radar
GSA	General Service Administration
HPC	Historic Preservation Coordinator
ICAM	Infrastructure Condition Assessment Model
KSVMF	Keystone Station and Vehicle Maintenance Facility
LPC	Landmarks Preservation Commission
LSAP	Leased Space Accessibility Program
MHT	Maryland Historical Trust
MOA	Memorandum of Agreement
NEPA	National Environmental Protection Act
NHPA	National Historic Preservation Act of 1966
NRHP	National Register of Historic Places
NRIS	National Register Information System
OMB	Office of Management and Budget
RFP	Request for Proposal
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 or Postal Service
WPA	Works Progress Administration

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]). The United States Postal Service (Postal Service) in an act of voluntary compliance with EO 13287 reporting requirements, submitted an initial report to the ACHP and the SOI in 2004, and a progress report in 2005 (USPS 2004a and 2005) and first triennial report in 2008. This document is the second triennial report for 2011.

The past 3 years have been truly unprecedented for the Postal Service. The need for the Postal Service to right-size and consolidate has become even more acute than it was in 2007, as evidenced by the \$5.1 billion loss in the previous fiscal year. Given ongoing fiscal constraints, it has become increasingly difficult for the USPS to carry out its core mission. Within this framework, the Postal Service has continued, despite its challenges, to meet the requirements of its historic preservation program.

A critical component of right-sizing its operations is the sale of various owned and leased postal facilities across the country. The Postal Service's real estate holdings – both owned and leased -- are being reduced. In order for the Postal Service to continue meeting its core responsibilities, it must adapt to the economic, societal and technological changes that make its business model relevant. Multiple goals must be pursued and linked to new initiatives, such as sustainability. This report highlights case studies that provide evidence of the Postal Service successfully pursuing several interrelated goals and remaining vibrant parts of the communities served.

This 2011 EO 13287 report (2011 EO Report) is submitted to the ACHP by the Postal Service as the organization's second triennial report under 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 2011 guidance document for the implementation of this EO (EO 13287 2003: Section 3).

This report includes:

- A description of the current status of the Postal Service's identification, protection, and use of historic properties
- description of Postal Service policies and reporting requirements related to the identification, protection, and use of the Postal Service's historic properties 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, 2005, and 2008 Section 3 Reports
- Future Postal Service plans to improve the organization's preservation program

2 Methodology

Research, analysis, and report production for this 2011 EO Report were conducted according to the guidelines provided by the ACHP in 2011 and the reporting requirements outlined in EO 13287 (ACHP 2011; 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, 2005, and 2008 (USPS 2004b; 2005; 2008b), ACHP 2011 reporting guidelines for the EO 13287 2011 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 2011 guidelines. The questionnaire was submitted to the Postal Service Federal Preservation Officer (FPO) and/or contractors working under the FPO responsible for overseeing historic properties. Additional interviews were conducted with Postal Service employees and/or contractors concerning the history and management of collections related to documenting the institution's history, internal database (eFMS – electronic Facilities Management System), and the Leased Space Accessibility Program (LSAP). (Interviews were conducted with the following Postal Service employees: Ms. Jennie Lynch, Senior Research Analyst, Historian; Real Estate Specialist for the Great Lakes FSO, Ms. Marla J. Larsen-Williams; 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

Information concerning the total number of Postal Service properties listed in the National Register of Historic Places (NRHP) was obtained from the National Register's online database, the National Register Information System (NRIS).

For the preparation of the case studies, additional research using desktop resources and interviews were conducted with internal Post Service employees mentioned above, staff associated with various State Historic Preservation Offices (SHPOs), and property owners of those post office buildings that were transferred out of Federal ownership.

3 The Postal Service Preservation Program

3.1 Mission Statement and Background

The Postal Service was established in 1775 by an act of Congress and was officially known as the Post Office Department (USPS 2006b). 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 a number of operating postal facility properties (listed in Volume 36 Number 173 of the Federal Register) 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 weakening 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 organization into a "Commercial Government Enterprise" (USPS 2002). The Plan directed the organization 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 2007).

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 and suggested a 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 2007).

On December 11, 2002, President George W. Bush issued Executive Order 13278: President's Commission on the U.S. Postal Service (USPS 2006:73). 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 nine-member 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 2003).

This process of internal organization 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 organization; “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).

Two years later in July of 2009, the Postal Service was back on the GAO’s High Risk List. (GAO Adds Postal Service’s Financial Condition to “High-Risk” List) (GAO-09-271) Citing profound effects of new technology, substantial drop in mail volume and significant infrastructure and personnel costs, the GAO urged Congress to develop and implement another restructuring plan. An identified short-term challenge was to cut expenses quickly enough to offset mail volume and revenue declines in order to avoid running out of cash needed to pay expenses. Long-term recommendations include consolidating operations, closing unneeded facilities, and reducing workforce. The Postal Service currently maintains an infrastructure of about 38,000 facilities nationwide.

3.2 Postal Service Preservation Policy

It is the policy of the Postal Service, by a resolution of the Board of Governors, (Board of Governors Resolution No. 82-7, November 9, 1982), to abide by the general policies and requirements for historic preservation applicable to the Federal government set out in Section 106 of the National Historic Preservation Act of 1966, Section 110 and 111 of the National Historic Act Amendments of 1980 and in Federal regulations issued to carry out these specific provisions of law. The Postal Service has also determined, through its regulations at 39 CFR 241.4(d), to comply with Executive Orders 12072 and 13006.

In order to comply with these Sections of the NHPA, their implementing regulations and Executive Orders, the Postal Service has developed standard requirements with respect to how its 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) outline Postal Service policy regarding historic properties (USPS

2008a; USPS 1997). Postal employees responsible for historic properties use these 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 Sections 106, 110 and 111 of the NHPA, applicable regulations and the above-referenced Executive Orders. 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). Handbook RE-6 is expected to be revised and the chart below may change.

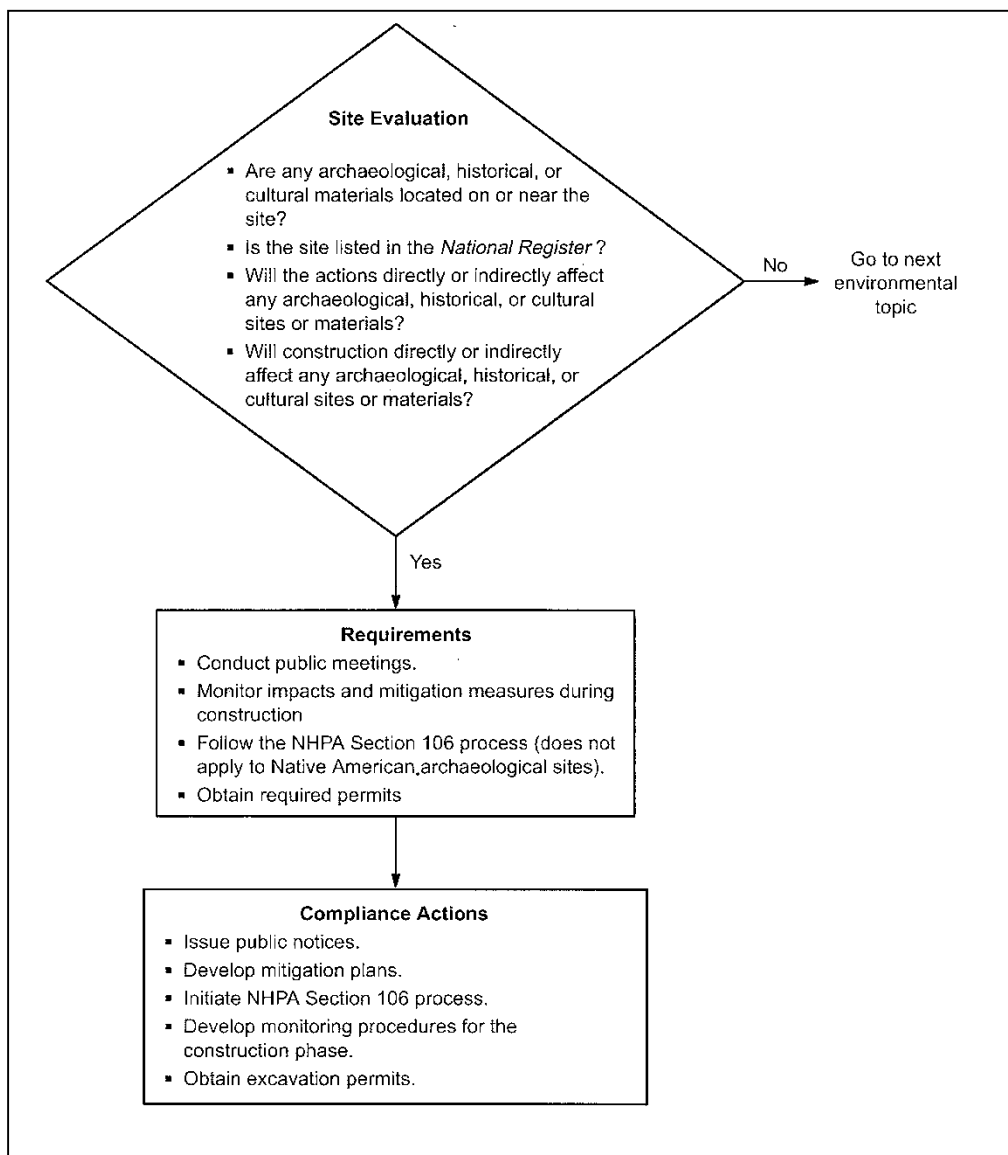


Figure 3-1. Historic and Cultural Resource Preservation Flow Chart from Facilities Environmental Guide (Handbook RE-6), p. 49

3.3 Postal Service Fiscal Constraints: Testimony, Newspaper Articles and the GAO Report

A commercially viable and financially stable Postal Service remains vital to the American economy. Despite the comprehensive legislative reforms and stringent internal management efforts, the Post Service reported a \$4.9 billion net loss for fiscal year 2011 (<http://about.usps.com/who-we-are/financials/10k-reports/fy2013.pdf>). These losses have been attributed to the national economic slowdown 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 contributes to even lower mail volumes and revenues.

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 organization's pressing need to identify ways to fund ever-increasing employee compensation programs (GAO 2008b:44).

In the past, the Postal Service was able to be self-supporting by relying on growth in mail volume. Although the current drop in mail volume is in part due to the recession, this trend is likely to continue beyond the current economic climate due to access to alternative electronic communication technologies. The Postal Service expects mail volume and revenue to continue declining next year, and flat or continued volume decline over the next 5 years.

In addition to the decrease in mail volume, visits to brick and mortar postal facilities are on the decline. Currently 85% of Postal Service revenue is generated from non-brick and mortar channels, while shares of retail revenue coming from other sources, such as digital services, stamps on consignment and self-service, have increased (USPS 2011a). This trend is consistent with the 2006 Congressional mandate to "expand and market a variety of alternative retail access channels" (USPS 2011a:8). On the facilities front, the Postal Service plans to study the future of 3,600 underutilized post offices.

Some post offices could consolidate or have hours reduced and others may move their service to retail establishments.

Retail Access Optimization Initiative (RAOI)

Since 2008, the Postal Service has cut 110,000 jobs and reduced costs by \$11 billion. Despite this, the Postal Service projects a 2011 budget deficit of \$8.3 billion (Mallenbaum 2011). Regulations on discontinuing a postal facility have recently been amended and now outline a decision making process (39 CFR 241.3). According to the regulations, a decision to close or consolidate a post office must be based on certain criteria, including the effect on the community served, the effect on the employees of the post office, compliance with the policy that the Postal Service must provide a maximum degree of effective and regular postal services to rural areas, communities and small towns where post offices are not self-sustaining, the economic savings to the Postal Service and other relevant factors. Relocations of postal services to another existing building or to a new site are governed by regulations found in 39 CFR 241.4.

Categories of retail facilities within the scope of the right-sizing initiative include Post Offices, stations and branches as described below:

- Low workload post offices (2,800 candidates) -- earned workload less than 2 hours per day and had revenue no greater than \$27,500.
- Insufficient demand and available alternative access (380 candidates) -- earned less than \$600,000 in 2010, less revenue in 2010 than average annual revenue for 2009, and 2008, and located within 12 miles of at least 5 alternative access sites.
- Retail annexes with insufficient demand and available alternate access (180 candidates) – Stations that offer retail service but do not house delivery operations and have annual revenue of less than \$1 million.
- Pending discontinuance actions awaiting public input – (260 Post Offices) (USPS 2011a).

The total number of candidates, as reported in direct testimony to the US Congress, is approximately 3,650 buildings and/or facilities from the Postal Service's entire portfolio. Postmaster General Donahoe announced right-sizing initiatives that could affect half of its 32,000 post offices, stations, and branches over the next six to seven years (USPS 2011b). Currently, 70,000 alternative retail outlets, such as supermarkets and kiosks, offer some Postal services.

Another often-cited source of financial drain is the USPS employee pension fund. The Postal Service is a self-funding entity that receives revenue from the sale of stamps and shipments; however, its workers receive benefits from the federal health care, retirement and workers compensation funds. The 2006 Postal Accountability and Enhancement Act of 2006 (Postal Accountability and Enhancement Act of 2006) mandated that the Postal Service pre-fund 75 years' of retiree health benefits over 10 ten years (Guffrey 2011). Other federal agencies have a pay-as-you-go benefit fund system. Without this pre-funding requirement, the Postal Service claims it would have made a profit of about \$1 billion from 2007 to 2010 (Rein and Davidson 2011).

Faced with a possible \$10 million Postal Service shortfall by the end of September of 2011, the Obama Administration became involved in the debate by backing proposals to end Saturday mail delivery and raise postage rates beyond the rate of inflation. In addition, the Postal Service would receive funds to lessen the financial burden of its benefit payments. Although supported by Postal employee unions and the Postal Service, critics in Congress referred to it as another taxpayer bailout.

In November, 2011 the US Senate announced a rescue plan that included a sizeable pension rebate, restructuring of the healthcare prefunding arrangements and a ban on eliminating Saturday deliveries for 2 years. By an 11 to 6 vote, a Senate committee approved the 21st Century Postal Service Act (S. 1789) on November 9, 2011. This bill would provide short-term financial relief and call for the dismantling of the agency's retail and mail processing network. American Postal Workers Union, Cliff Guffrey stated the bill will eliminate "hundreds of mail processing facilities and thousands of post offices, stations and branches" (APWU 2011). This bill did not become law.

Congress is allowing the Postal Service short-term relief on some of its financial commitments. The continuing resolution recently passed by the Senate included a measure to give the Postal Service until November 18 to pay a \$5.5 billion debt to the Treasury. The House is expected to approve the legislation (Kopp 2011). On November 17, 2011, the Postal Service announced plans to resume payments to the defined-benefit portion of the worker retirement fund next month, adding that they have enough cash to make the payments, although the USPS lost \$4.9 billion in the past fiscal year due to decrease in mail volume and growing labor costs. (O'Keefe 2011c). Congress continues to debate the future funding and management of the Postal Service.

Customer demand has always played a part in the Postal Service's reorganizing efforts. The Postal Service still delivers 40 percent of the world's mail to 150 million homes and businesses. Today, many home businesses rely on postal delivery and many goods purchased online and shipped with FedEx and UPS arrive with "last minute" delivery by the USPS (Rubio 2011). There are real and significant challenges facing the Postal Service, and there is no quick fix or simple solution to the organization's challenges. Right-sizing its operations is necessary and how this is accomplished will determine the legacy of this independent establishment.

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). Major changes, however, have been made to the organization of regional FSOs.

3.4.1 Facilities Headquarters

The Postal Service's Facilities Headquarters, located in Washington DC, is responsible for overseeing all properties under the control of the Postal Service. Two individuals at Facilities Headquarters, the Vice President of Facilities and the FPO, are responsible for overseeing historic properties (Dallan Wordekemper, personal communication 2008).

3.4.1.1 Manager, National Real Estate

The Manager of National Real Estate is responsible for managing the inventory of all properties, historic properties and objects under the control of the Postal Service.

3.4.1.2 Federal Preservation Officer

Section 110(c) of the NHPA states that the “head of each Federal agency shall, unless exempted under section 214, designate a qualified official to be known as the agency's “preservation officer” who shall be responsible for coordinating that agency's activities under this Act” (National Historic Preservation Act, 16. U.S.C. 470). The Postal Service FPO is responsible for responding to all comments and inquiries regarding historic properties, engaging in Section 106 consultations, preparing nominations to the NRHP, and creating preservation, restoration, relocation, and maintenance plans for buildings, sites, and objects (Dallan Wordekemper, personal communication 2008). The FPO also carries out Section 111 responsibilities, and approves all Building Disposition Plans and Artwork Retention Plans and authorizes loan agreements for items in the New Deal Arts Programs Collection.

3.4.2 Postal Historian

The Postal Historian is part of the Legislative Policy and Strategy Development group under the Government Relations and Public Policy department of the Postal Service, and reports to the Vice President of that department. The Postal Historian is responsible for overseeing the preservation of information and artifacts relating to Postal Service history. The Postal Historian is responsible for managing the Postal Service's collection of artifacts, historical photographs, records, and fine art, except for New Deal and stamp design artwork. Local postal officials may not dispose of historic items without the approval of the Postal Historian. This is a full-time position.

3.4.3 Facilities Service Offices

3.4.3.1 Historic 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 (Dallan Wordekemper, personal communication 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.

3.4.3.2 FSO Organization

The Postal Service has divided the United States into seven areas which are served by six Facility Service Offices (FSO) (Figure 3-1). 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 (Dallan Wordekemper, personal Communication 2008).

Since the 2008 EO Report, the number of regions and grouping of states has changed with the more significant modifications in the regions that make up the eastern half of the United States.

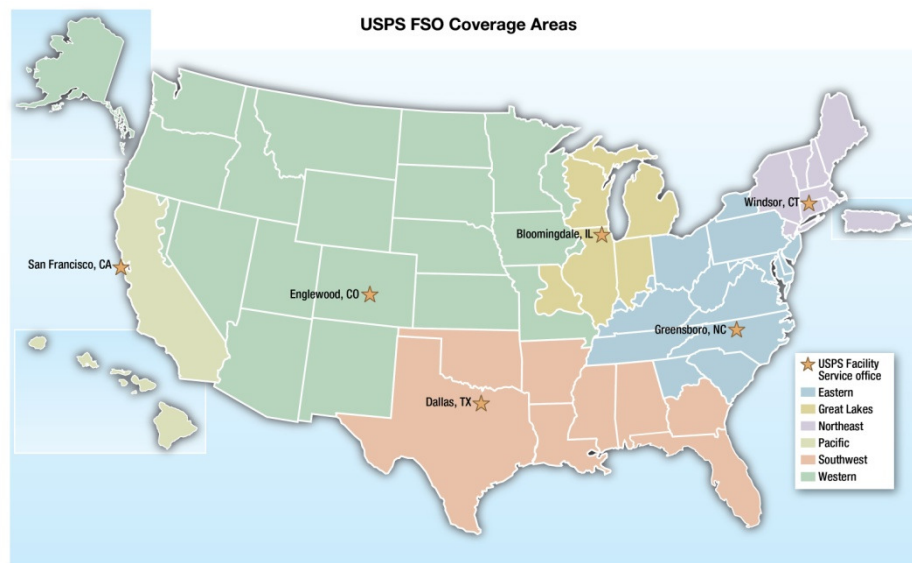


Figure 3-2. USPS FSO Coverage Areas (Courtesy of the U.S. Postal Service)

The current jurisdictions handled by the six FSOs are as follows: (Dallan Wordekemper, personal communication August 6, 2011):

- The Northeast FSO includes Maine, New Hampshire, Vermont, Massachusetts, Connecticut, and Rhode Island, the eastern portion of New York, northern New Jersey, the Commonwealth of Puerto Rico, and the U.S. Virgin Islands.
- The Eastern FSO includes Delaware, the District of Columbia, a portion of Georgia, Kentucky, Maryland, southern New Jersey, western New York, North Carolina, Ohio, Pennsylvania, South Carolina, Tennessee, and West Virginia.
- The Southwest FSO includes the Mississippi, Alabama, Florida, Arkansas, Louisiana, Oklahoma, Texas, and the remaining portion of Georgia.
- The Great Lakes FSO includes Michigan, the bulk of Indiana, the eastern portion of Wisconsin, all areas of Illinois, except the northwest corner, and the northeast corner Missouri.
- The Pacific FSO includes Hawaii and all of California except the northeast corner.
- The Western FSO includes Alaska, Washington, Oregon, Idaho, Montana, Nevada, Colorado, Wyoming, Utah, North Dakota, South Dakota, Nebraska, Kansas, Minnesota, Iowa, Arizona, New Mexico, the western portion of Wisconsin, the northwest corner of Illinois, the western and southern portions of Missouri, and the northeast corner of California.

4 Identification of Historic Properties

Section Four provides an update on the number and types of historic and possibly historic properties that are currently owned or managed by the Postal Service. The Postal Service follows the definitions in the regulations implementing Section 106 of the NHPA to classify its properties as historic. The regulations under Section 106 define a historic property as one that is listed in the NRHP or eligible for such listing. This section also discusses the organization's policies and procedures for complying with Section 110 of NHPA and EO 13287.

4.1 Composition and Distribution of Postal Service Historic Properties

The Postal Service's real property database, eFMS, identifies buildings, including historic buildings, and items from the New Deal Arts Collection that are located in Postal Service buildings. 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

4.1.1.1 Composition

The Postal Service owns or leases a total of 36,146 properties, with 8,989 properties being owned and 26,841 properties being leased (Figure 4-1, National Register Information System, Online database). Of the 8,989 owned properties, which includes post office buildings, plants, distribution centers, vacant land for post office development or modular post offices, 2,491, or 28 percent, are classified by the Postal Service as possible historic properties. (Figure 4-2). In eFMS, the Postal Service classifies a building that is 50 years or older as possibly eligible for listing in the NRHP, whether or not it has received a formal determination of eligibility. Comparison of current statistics with the data provided in the 2008 EO Report indicates that the total number of buildings currently owned and leased by the USPS has decreased by 608, or 2 percent, since 2008 (USPS 2008b).

Consistent with the Postal Service's need to right size its operations, a total of 81 properties were sold since 2008. Of these 81 properties, 23 were possible historic properties, or approximately 28 percent. The number of possible historic properties sold breaks down as follows: 5 in fiscal year 2009, 7 in fiscal year 2010, and 11 in fiscal year 2011. Please note that the transactions were categorized as either complete or partial sales and some of the transactions were only raw land. The following table provides detailed information on the historic properties sold during this period.

Table 4-1. Historic Properties Sold from Fiscal Year 2009 through Fiscal Year 2011

State	City/Town	Transfer Date (Month, Year)	Buyer	Facility Name	Building Occupied Year / NRHP Status
AZ	Phoenix	Aug-09	Non-Federal	Phoenix Downtown Station	1936 / Eligible
CA	Bell	Sep-09	Non-Federal	Bell Finance Station	1935 / Eligible
CA	Roseville	Apr-10	Non-Federal	Roseville Main Office	1935 / Eligible
CT	Meriden	Jun-09	Non-Federal	Meriden Main Office	1908 / Listed
CT	New Haven	Dec-09	Non-Federal	New Haven Main Office	1954 / Eligible
CT	Westport	May-11	Non-Federal	Westport Main Office	1936 / Eligible
CT	Greenwich	Aug-11	Non-Federal	Greenwich Avenue Station	1917 / Listed
FL	Palm Beach	Feb-11	Non-Federal	Palm Beach Main Office	1937 / Listed
IL	Naperville	Jun-11	Non-Federal	Naperville Finance Station	1940 / Eligible
LA	Franklin	Sep-10	Non-Federal	Franklin Main Office	1914 / Eligible
MD	Bethesda	Mar-11	Non-Federal	Bethesda Main Post Office	1938 / Eligible
MI	Birmingham	Apr-10	Non-Federal	Birmingham Administration Offices	1940 / Eligible
MN	St. Paul	May-09	Non-Federal	St. Paul Main Office / P&DC	1934 / Listed
MO	Washington	May-10	Non-Federal	Washington Old Main Office	1922 / Eligible
NC	Beaufort	Jun-11	Non-Federal	Beaufort Main Office	1938 / Eligible
NJ	Riverton	Jan-10	Non-Federal	Riverton Main Office	1940 / Eligible
NY	Ballston Spa	May-11	Non-Federal	Ballston Spa Main Office	1935 / Listed
PA	Lewisburg	Dec-10	Non-Federal	Lewisburg Main Office	1933 / Eligible
PA	Erie	Dec-10	Non-Federal	Erie Downtown Station	1932 / Eligible
TX	El Dorado	Feb-09	Non-Federal	El Dorado Downtown Station	1931 / Eligible
TX	Pasadena	Oct-10	Non-Federal	Pasadena Bob Harris Station	1940 / Eligible
WA	Tacoma	May-10	Non-Federal	Tacoma Downtown Station	1910 / Listed
WA	Kent	Jun-11	Non-Federal	Kent Main Office	1940 / Eligible

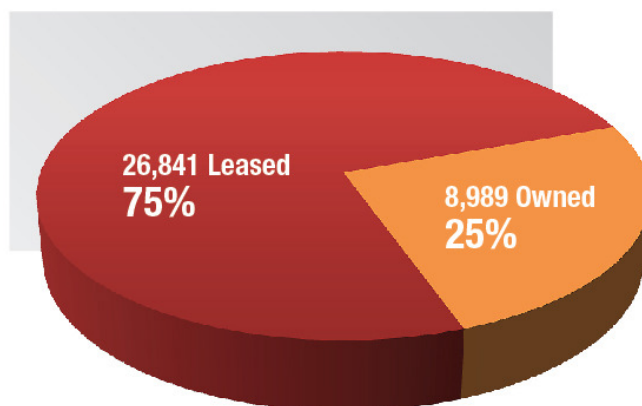


Figure 4-1. Buildings and Land Owned or Leased by the Postal Service

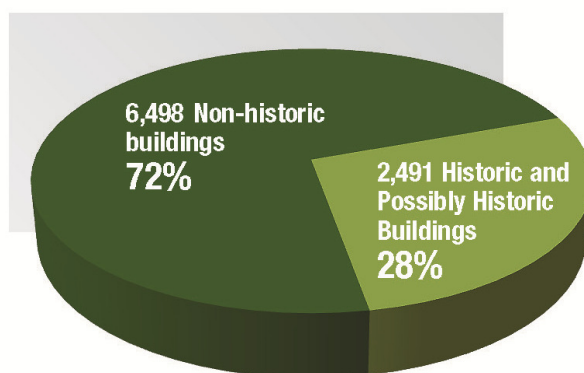


Figure 4-2. Postal Service Buildings Considered Historic and Possibly Historic

Of the buildings owned by the Postal Service, 523 (21 percent) are listed in the NRHP, while the remaining 1,968 buildings are considered possibly historic, by virtue of their construction date of 1961 or older (Figure 4-3, National Register Information System).

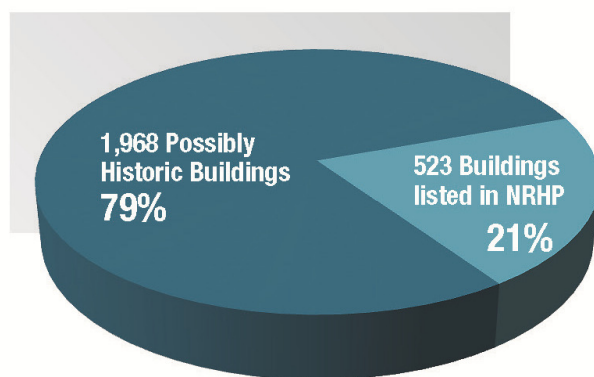


Figure 4-3. Historic Postal Service Buildings Listed in the National Register and Other Possibly Historic Buildings

The Postal Service's real property database, eFMS, does not contain a current number of properties listed in or formally determined eligible for listing in the NRHP. Time constraints prevent constant updating.

For this report, the current number(s) of Postal Service facilities that are historic (i.e., those listed in the NRHP), and those considered possibly historic (i.e. buildings dating from 1968 or older), was obtained from the Postal Service.

4.1.1.2 Historic and Possibly Historic Building Distribution

The majority of the historic and possibly historic buildings owned by the Postal Service are found in the Eastern FSO, Northeast FSO, and Western FSO. Pennsylvania contains the majority of the historic buildings in the Eastern FSO. New York contains the majority of the historic buildings in the Northeast FSO. The Pacific FSO (5 percent) has the fewest historic buildings reported in the database.

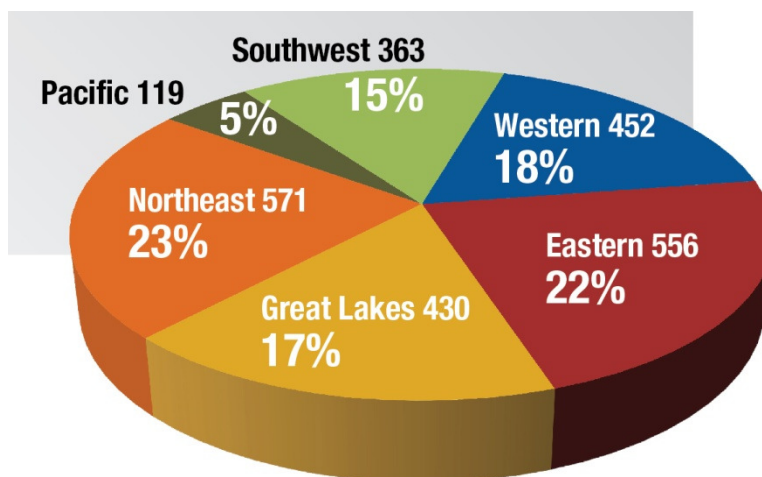


Figure 4-4. Historic and Possibly Historic Postal Service Buildings by FSO

4.1.1.2.1 Northeast FSO

The Northeast FSO contains a total of 571 historic and possibly historic buildings (Table 4-1). New York State contains 189 historic Postal Service buildings, the highest number in the Northeast FSO.

Table 4-2. Northeast FSO Historic and Possibly Historic Buildings

State	Total Number of Historic and Possibly Historic Buildings
CT	41
DC	4
GA (30%)	13
MA	86
MD	26
ME	31
NC	36
NH	18
NJ (50%)	58
NY (60%)	189
PR	3
RI	12
SC	16
VA (50%)	28
Virgin Islands	1
VT	9
Total	571

The District of Columbia, the Commonwealth of Puerto Rico, and the Virgin Islands are the jurisdictions with the fewest number of historic or possibly historic buildings. The historic and possibly historic buildings within the Northeast FSO are shown in Figure 4-5.

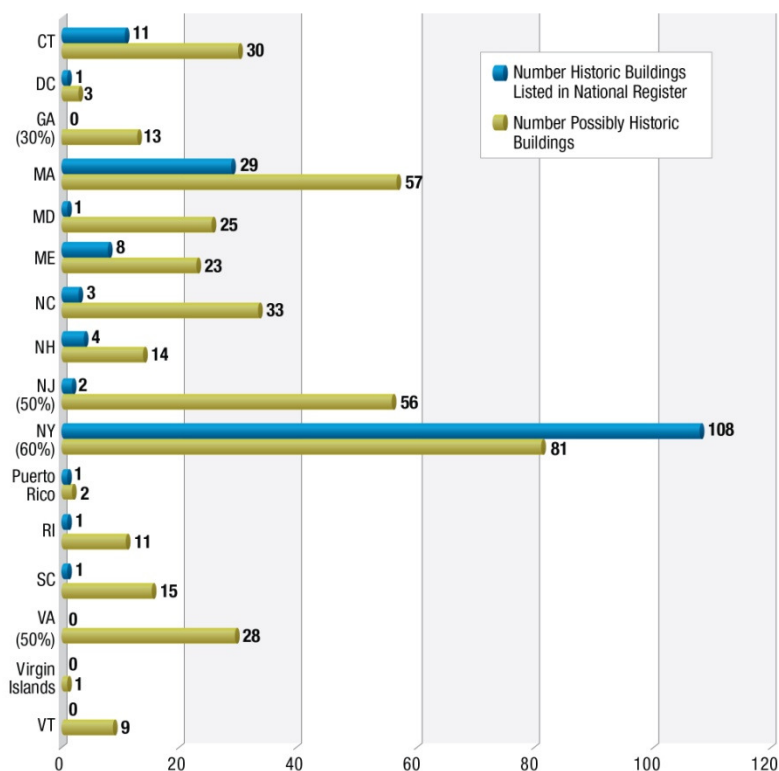


Figure 4-5. Northeast FSO Historic and Possibly Historic Buildings Status by State

4.1.1.2.2 Eastern FSO

The Eastern FSO contains a total of 556 historic and possibly historic buildings (Table 4-3).

Table 4-3. Eastern FSO Historic and Possibly Historic Buildings

State	Total Number of Historic and Possibly Historic Buildings
DE	9
GA (20%)	2
KY	51
NJ (50%)	35
NY (40%)	45
OH	126
PA	182
TN	49
VA (50%)	20
WV	37
Total	556

The historic and possibly historic buildings within the Eastern FSO are shown in Figure 4-6. Georgia and Delaware have the lowest number of historic buildings. Delaware has one historic building listed in the NRHP, as well as eight buildings that are eligible for listing. Pennsylvania has the highest number of historic properties out of all the States within the Eastern FSO with 182 historic buildings, three of which are listed in the NRHP.

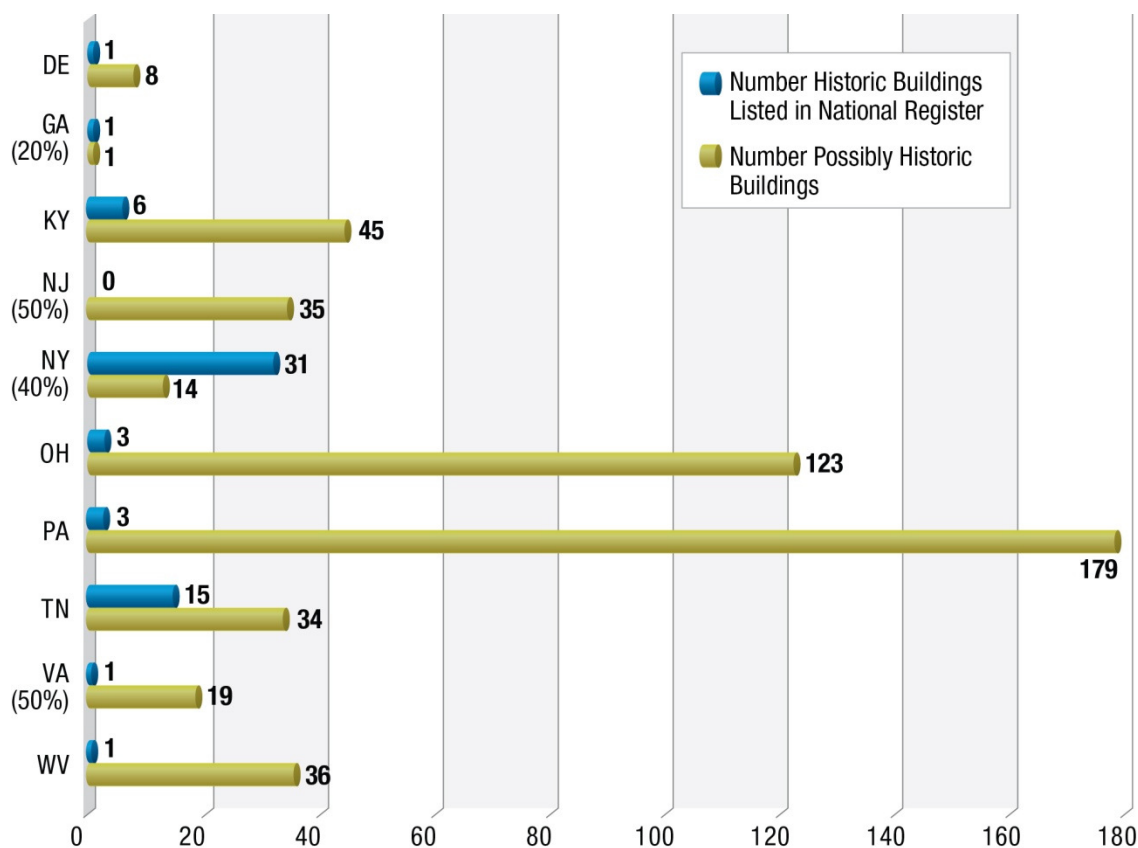


Figure 4-6. Eastern FSO Historic and Possibly Historic Buildings Status by State

4.1.1.2.3 Great Lakes FSO

The Great Lakes FSO contains a total of 430 historic and possibly historic buildings (Table 4-4). The Illinois portion of this FSO contains 170 historic and possibly historic buildings, the highest number in the Great Lakes FSO.

Table 4-4. Great Lakes FSO Historic and Possibly Historic Buildings

State	Total Number of Historic and Possibly Historic Buildings
IL (95%)	170
IN (80%)	80
MI	98
MO (50%)	32
WI (60%)	50
Total	430

The State with the fewest historic and possibly historic buildings in this FSO is Missouri, which has 32 historic and possibly historic buildings.

The historic and possibly historic buildings listed within the Great Lakes FSO are shown in Figure 4-7. Missouri and Indiana have no historic or possibly historic buildings listed in the NRHP.

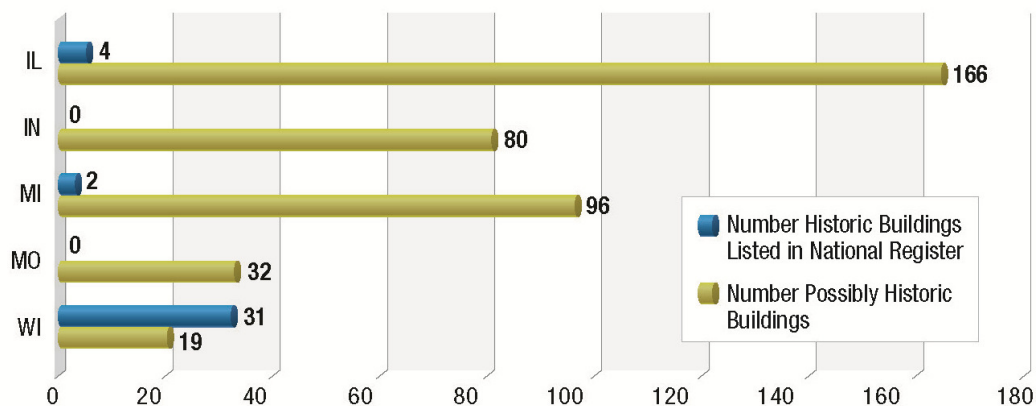


Figure 4-7. Great Lakes FSO Historic and Possibly Historic Buildings Status by State

4.1.1.2.4 Southwest FSO

The Southwest FSO contains a total of 363 historic and possibly historic buildings (Table 4-5). Texas contains 113 historic and possibly historic buildings, the highest number within the Southwest FSO.

Table 4-5. Southwest FSO Historic and Possibly Historic Buildings

State	Total Number of Historic and Possibly Historic Buildings
AL	37
AR	33
FL	28
GA (50%)	30
LA	32
MS	44
OK	46
TX	113
Total	363

The State with the fewest historic and possibly historic buildings in this FSO is Florida, with 28 buildings.

The historic and possibly historic buildings within the Southwest FSO are shown in Figure 4-8. Of the 113 historic and possibly historic buildings in Texas, 8 are listed in the NRHP.

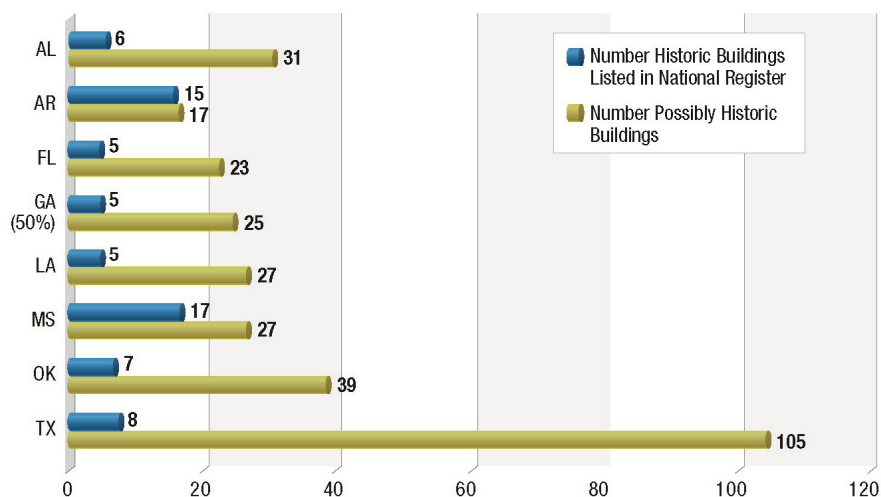


Figure 4-8. Southwest FSO Historic and Possibly Historic Buildings Status by State

4.1.1.2.5 Pacific FSO

The Pacific FSO contains a total of 119 historic buildings (Table 4-6). California contains 116 historic and possibly historic buildings, the highest number in the Pacific FSO.

Table 4-6. Pacific FSO Historic and Possibly Historic Buildings

State	Total Number of Historic and Possibly Historic Buildings
CA	116
HI	3
Total	119

The State with the fewest historic and possibly historic buildings in this FSO is Hawaii, with only three buildings.

The historic and possibly historic buildings within the Pacific FSO are shown in Figure 4-9. Of the 116 historic and possibly historic buildings in California, 27 are listed in the NRHP.

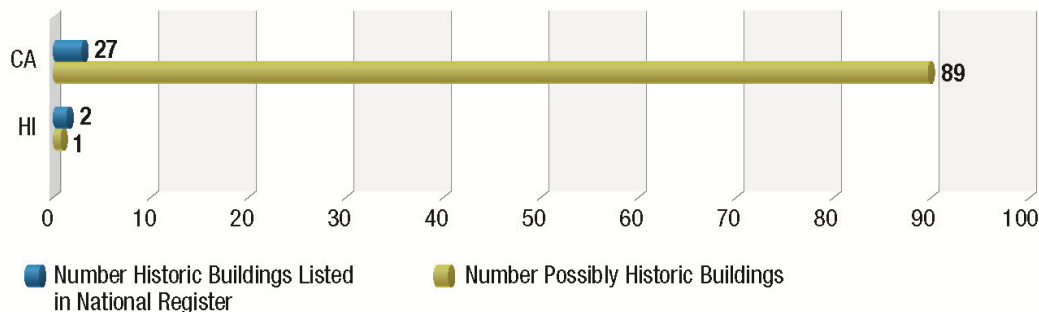


Figure 4-9. Pacific FSO Historic and Possibly Historic Buildings Status by State

4.1.1.2.6 Western FSO

The Western FSO contains a total of 452 historic and possibly historic buildings (Table 4-7), Iowa contains 68 historic buildings the highest number in the Western FSO. The fewest number of historic and possibly historic buildings in this FSO are located in the Alaska and New Mexico. The historic and possibly historic buildings within the Western FSO are shown in Figure 4-10.

Table 4-7. Western FSO Historic and Possibly Historic Buildings

State	Total Number of Historic and Possibly Historic Buildings
AK	2
AZ	10
CA	0*
CO	27
IA	68
ID	16
IL (5%)	0
KS	58
MN	49
MO (50%)	44
MT	13
ND	13
NE	35
NM	3
NV	7
OR	15
SD	21
UT	15
WA	30
WI (40%)	12
WY	14
Total	452

*See Western FSO.

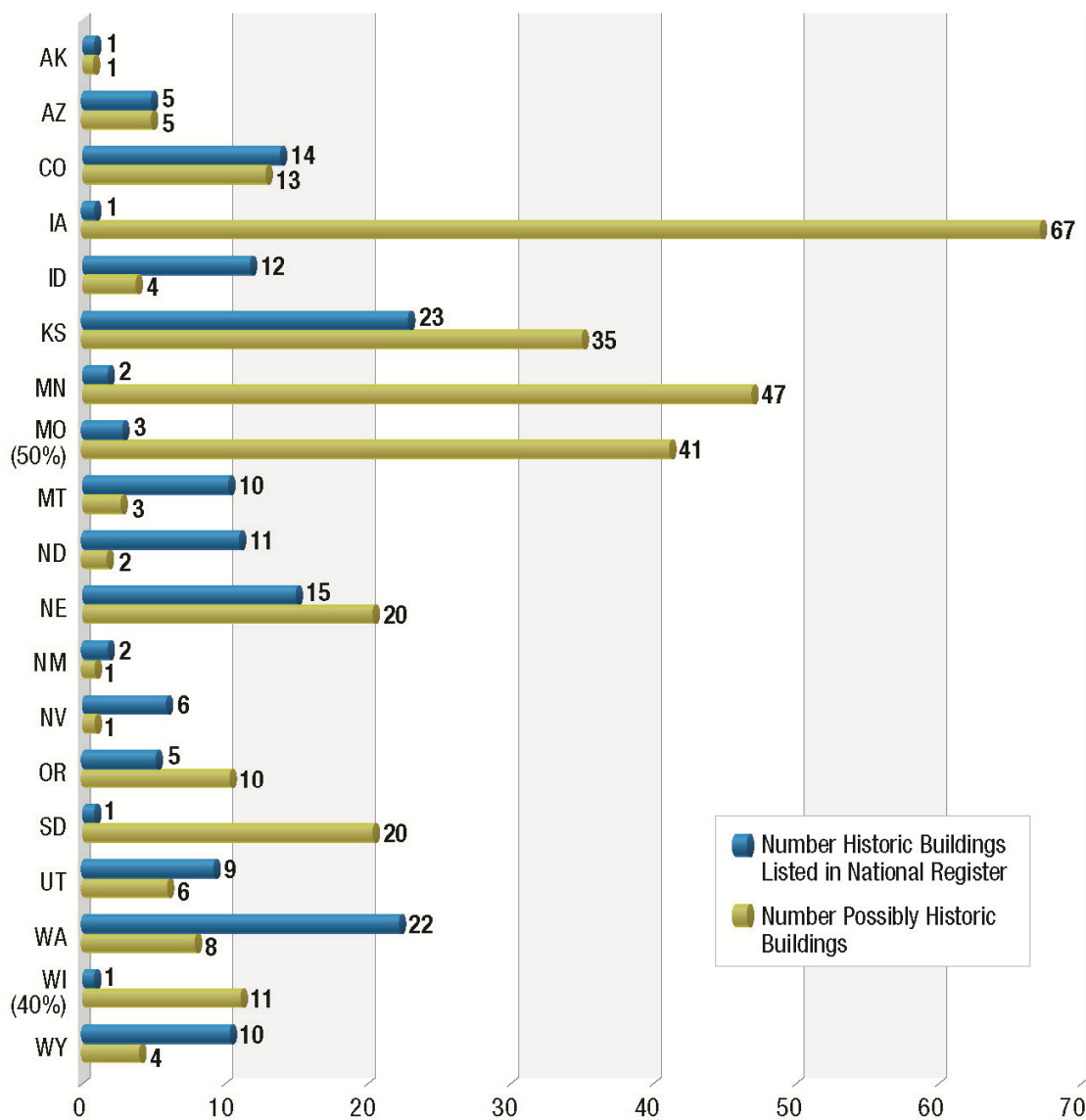


Figure 4-10. Western FSO Historic and Possibly Historic Buildings Status by State

4.1.2 Reporting Mechanisms and Systems

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

4.1.2.1 Facilities Management System Database

Some 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), NRHP status or similar (listed in the NRHP or considered eligible for listing in the NRHP, based on the building being 50 years of age or greater, 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.

The eFMS system is updated by Facilities personnel based on information collected during the maintenance, acquisition, or disposition of property. The historic status section of the database is reviewed and updated at such time as an "undertaking" occurs.

4.1.2.2 Federal Archaeology Program Report

In previous years, the FPO has voluntarily completed an annual questionnaire describing the Postal Service's archaeological activities during the fiscal year for submission to the SOI. This report is known as the Federal Archaeology Program (FAP) Report (National Park Service, Federal Archeology Program). This information is included in the SOI's annual report to Congress on Federal archaeological activities. These reports were not completed for the period 2009-2011.

4.1.2.3 New Deal Arts Collection Database

In addition to the eFMS system, the Postal Service maintains a database containing information on the New Deal Arts Collection. 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 FSO HPCs. Postmasters or members of the community forward requests for information from it to those individuals.

4.1.3 Archeological Properties

The Postal Service does not maintain an inventory of archeological sites that are located within the boundaries of facilities that are owned or leased by the agency (James Ruffing, personal communication 2008). Information concerning the nature of archaeological investigations carried out by the Postal Service is reported by the FPO to

the SOI in the FAP Report that describes archeological activities conducted by the organization (Dallan Wordekemper, personal communication 2008).

CASE STUDY: Keystone Station Vehicle Maintenance Facility, Harrisburg, PA

The Keystone Station and Vehicle Maintenance Facility (KSVMF) is located in a small industrial and commercial section of Harrisburg, Pennsylvania. Built around 1962, the KSVMF consists of the Harrisburg Post Office, the vehicle maintenance facility (VMF), and a large concrete parking lot. The Harrisburg Post Office is a rectangular, two-story, International-style building with a flat roof and basement.

USPS considered transferring ownership of the KSVMF to a new owner. In September of 2009, the Postal Service submitted a historical, cultural, and archaeological resources screening report, to the Pennsylvania Historical and Museum Commission (PHMC) for comment. The report documented the presence of six historic districts and 16 previously identified above-ground resources within 1 mile of the KSVMF. The PHMC determined that the undertaking would not affect known above-ground historic resources, but recommended conducting a Phase IA archaeological assessment, possibly followed by Phase IB survey, or that a protective covenant be placed on the property prior to the transfer. In particular, it was noted that the property may have potential to contain resources associated with historic residential development, the Pennsylvania Canal, and the Lebanon Valley Railroad Company (URS 2010). The goal of the Phase IA study was to determine the property's potential for significant archaeological resources and assess potential levels of integrity.

Historic maps of the area showed that numerous buildings and facilities were built on the KSVMF property since the mid-nineteenth century. Maps dating from the 1840s and 1860s depict the presence of the Pennsylvania Canal, the Buehler & Cameron and Till & Mains boat yards, and the W. Colder House (URS 2010). Sanborn fire insurance maps further chronicled the industrial and railroad expansion that took place on the property during the late nineteenth and early twentieth centuries.

Based on this research, USPS contracted with SOI qualified archaeologists and historians to conduct a geophysical survey and a Phase IA survey, which assessed subsurface conditions and identified subsurface cultural features (URS 2010). The geophysical investigation consisted of electromagnetic (EM) and ground-penetrating radar (GPR) surveys. The combination of the two methods provided added confidence in locating potential subsurface features of interest including both metallic and non-metallic objects.

The EM survey was conducted using the EM-31 terrain conductivity meter manufactured by Geonics, Ltd. The EM-31 provided a rapid and cost effective means of measuring the electrical conductivity of subsurface materials including soil, rock and buried wastes. EM data aided in the characterization of buried metallic objects, lateral extent of building foundations, disposal areas, buried pathways, and/or trench materials and other features associated with ground disturbance (URS 2010). The EM-31 method involved the production of an electrical current producing a primary, variable magnetic field that produces secondary magnetic fields. A receiver measured changes in magnitude and phasing of voltages correlated to subsurface materials.

GPR is an effective technology for detecting and delineating buried features such as metallic and non-metallic utilities, graves, building foundations, landscape features, trenches and artifacts. The GPR method involves transmitting high-frequency electromagnetic pulses and then measuring the radar pulses reflected from various subsurface materials or objects. The geophysical surveys were conducted across the accessible portions of the designated areas of interest. The EM data were collected along a series of parallel profiles spaced approximately 5 feet apart and oriented generally north-south. EM data were collected at a rate of 10 readings per second and merged with positional data using a Trimble ProXH differential global positioning system (GPS)(URS 2010). Continuous GPR data were collected with positional data recorded at 1-second intervals with self-contained transmitter/receiver antenna towed along the transect lines (URS 2010).

While research indicated there was a potential for the presence of archaeological resources in the project area, the geophysical investigation results did not support this analysis. Most of the KSVMF property had been subjected to significant subsurface disturbance related to construction of the USPS building, parking lots, subsurface utility networks, and the various railroad tracks (URS 2010). Only one small area, along what was once Chestnut Street in the northeast corner of the property, indicated minimal disturbance. No geophysical responses suggested the presence of historic features, such as canals or foundations.



Figure 4-11. Facing northwest towards the KSVMF



Figure 4-12. View facing southeast toward the parking area where the GPR and EM surveys were conducted

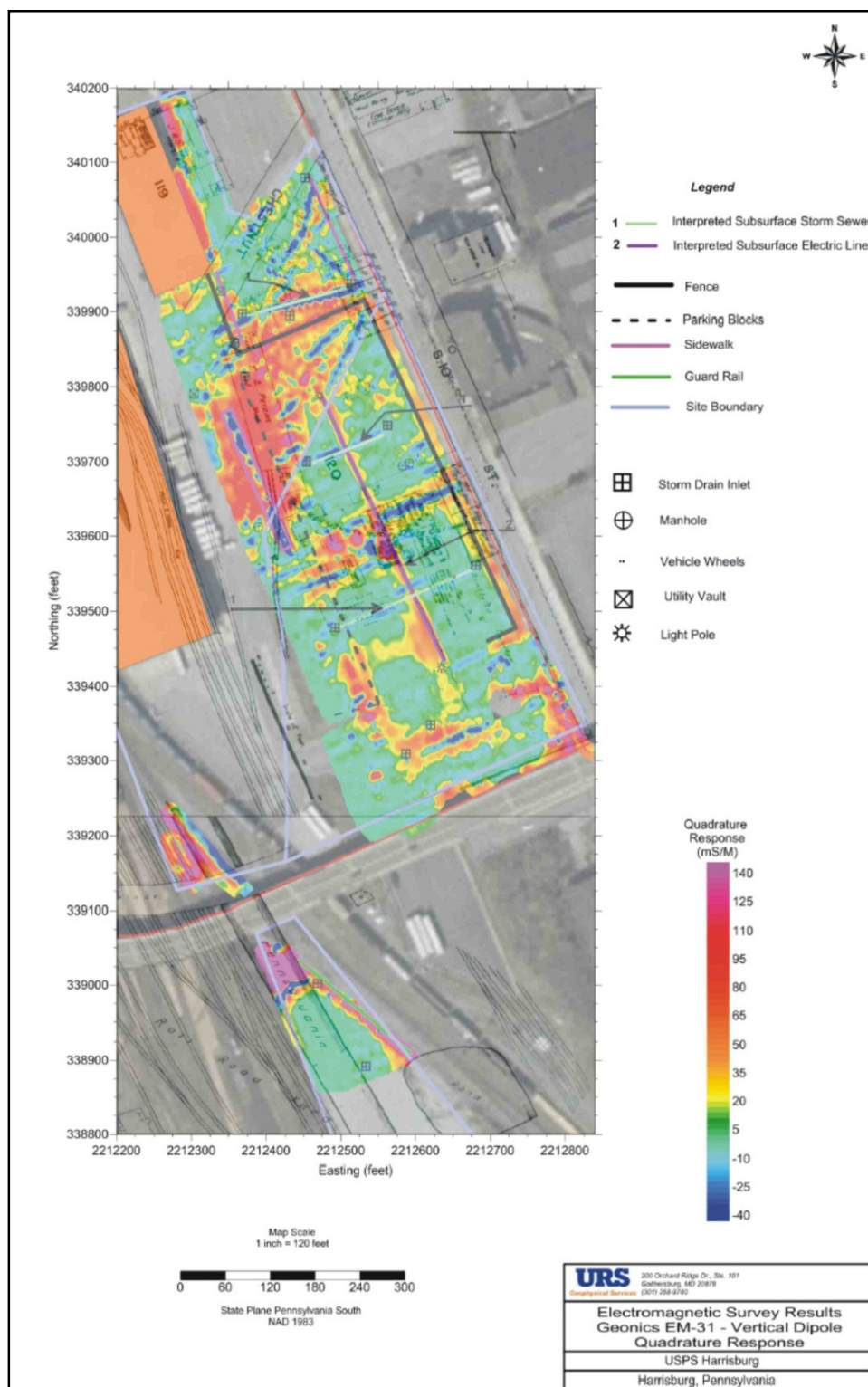


Figure 4-13. Example of exhibit depicting electromagnetic survey results

4.1.4 Structures, Sites, Districts, and Objects

The NRHP 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 (Andrus and Shrimpton 1997: 4). A site is the location that has a historical association with a topic of a significant event where the location itself possesses value. The Postal Service does not identify or categorize the location of structures or sites in eFMS or whether or not its owned or leased properties are within 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 NRHP. Although it may be, by nature or design, moveable, an object is associated with a specific setting or environment (Andrus and Shrimpton 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 clocks, along with vehicles, artworks (other than items from the New Deal Arts Collection), photographs, and papers as historic character-defining features under Section 106 of the NHPA.

The Postal Service described its policies and procedures for managing objects under its purview in the 2005 EO report (USPS 2005: 4-3). The FPO and Postal Historian have shared responsibilities to determine how objects are protected and managed, and, depending upon the type of object, for their disposition.

4.1.5 Artifacts

Artifacts are not a NRHP 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 database to catalog Postal Service artifacts, called MIMSY-XG, was created and launched in January 2008 at the National Postal Museum (Megaera Ausman, personal communication 2008). This database was populated using information transferred from previous and outdated databases. New Deal Arts Collection

The New Deal Arts Collection is a valuable and historically significant asset owned by the Federal Government. Some pieces of the collection are controlled by the General Services Administration and some 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 2005). Some of these belong to the Postal Service and some belong to the GSA.

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 (USPS 2010).

4.1.5.1 Data Collection

Information about the Postal Service's portion of the U.S. Government's New Deal Arts Collection is contained at Facilities Headquarters (Dallan Wordekemper, personal communication 2008). The database was developed in 2002 and has been maintained by the FPO. This database is the FPO's primary tool to track artwork and to provide assistance to post offices around the country.

4.1.6 Historic Property Identification and Evaluation Policies

Policies concerning historic properties identification and evaluation are outlined in the Postal Service documents: Handbook RE-1, *Realty Acquisition and Management* (updated June 2008), and Handbook 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 handbooks are made available to Postal Service facilities employees via hardcopy and/or online via the Postal Service's internal network.

The Postal Service engages in a process to identify a property as historic or non-historic at the time that the Postal Service engages in an "undertaking" as defined in the regulations implementing Section 106 of the NHPA.

The Postal Service continues to be challenged by its fiscal constraints and ongoing efforts to modernize its procedures to better carry out its core mission. A comprehensive historic property identification and evaluation program is cost prohibitive and would not eliminate the need to engage in the same identification and evaluation process each time there was an undertaking with respect to a specific property.

4.2 Partnerships: Identification and Evaluation

The Postal Service relies on its employees and consultants to carry out its Section 106 consultation responsibilities, including the identification and evaluation of historic properties using qualified contractors. The Postal Service has discussed but has not implemented partnerships 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 except in the context of Section 106 consultations.

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 establishment that are actively used on a daily basis. The Postal Service continues to work diligently to balance the stewardship and protection of these properties with the challenge of meeting 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 manage its properties is to use and maintain those historic properties that are operationally significant, and to find new owners for properties, including historic properties, that do not meet the Postal Service's operational needs—owners who will responsibly protect these properties in the future. Currently, the Postal Service is in the process of right-sizing its operations, as demand for first class mail service has decreased approximately 25% over the past five years and the agency faces increasing costs from its retirement health care program. This loss of revenue, coupled with an increase in operational costs, has created substantial pressure to right size the operations and facilities used in such operations.

5.1 Types of Protection

The organization 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. Most historic post offices that remain in Postal Service ownership are located in small town centers or dense urban cores. When originally built, these downtown post offices were an essential component of an active commercial economy. Their importance was reflected in their design, and historic post office buildings were usually among the finest buildings in a community. The post office building was often the primary architectural symbol of the Federal government in smaller towns. While some such buildings continue to house Postal Service operations, a number of such operations have been relocated to newer facilities to accommodate rapid population growth and technological advances and to better serve the public.

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 2003: 97). 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 2003: 97). The Postal Service welcomes local interests to engage in the bidding process as prospective purchasers of 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 GSA, and has engaged in discussions from time to time with GSA regarding the transfer of Postal Service properties to the GSA. The location and size of historic buildings affect the potential for their continued use. Among the major reasons underlying the decision

to vacate such properties is that the facilities are not able to be efficiently readapted and updated to meet growing service needs or are too large for the operations currently in place.

If practicable, the Postal Service maintains a presence in its historic buildings and downtown locations by reducing operations in a building to a “station” or retail facility and transferring other operations to a new location that better serves the agency’s mission. (Dallan Wordekemper, personal communication 2008). In some cases, such as the James A. Farley Building and Western Annex in New York City the Postal Service retained a long term lease agreement to operate small retail facilities within these large buildings when they are transferred with protective covenants to new owners (Dallan Wordekemper, personal communication 2008).

5.2 Historic Property Protection Policies

The Postal Service, like other entities which are self-sustaining, develops agency-wide strategic plans and annual performance plans at the national or regional levels. The core of the Postal Service’s asset management policy is to:

- Analyze the Postal Service’s real estate holdings organization-wide and determine the most efficient use and reuse of all of its holdings, including historic properties
- Maintain its collection of properties, including historic properties and repair them as and when necessary, with such repairs and maintenance of historic properties to be done in accordance with Federal historic preservation requirements, including 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 nationwide
- Engage in appropriate consultations under Section 106 so that when historic properties are transferred to new owners through disposition activities, they are transferred to new owners subject to an agreement to preserve the historic features of such properties or subject to a Memorandum of Agreement that directs the Postal Service and the new owner to engage in certain preservation activities.

5.3 Transferring Ownership of Historic Buildings

The Postal Service is cognizant of the requirements under Sections 110 and 111 of the NHPA to maintain, reuse, and readapt its historic real estate if practicable. When the need to transfer a property to a new owner arises, the Postal Service follows Section 106 of the NHPA and the implementing regulations. The FPO works in conjunction with the Postal Service’s Facilities department to help identify historic properties and to support Section 106 consultation efforts to avoid, minimize, or mitigate adverse effects that arise from a transfer out of Federal ownership.

Often, when selecting a buyer or developer for a historic property, the Postal Service must find one willing to accept legal restrictions governing the property and its future redevelopment.

The ACHP 2011 publication *Sustainability and Historic Federal Buildings* notes the role of Federal agencies reusing underutilized or vacant Federal historic buildings as a form of sustainability. The practice of one federal agency utilizing "... historic buildings that may be excess for another federal agency is an opportunity to meet historic preservation and sustainability goals concurrently." The publication goes on to note that, although many Federal agencies have excess buildings, the Postal Service has "approximately 400 excess post office buildings, many historic or located in historic districts in urban or town centers." An alternative to acquisition is for Federal agencies to consider leasing historic properties in accordance with Section 111 of the NHPA, which allows the proceeds from the lease to benefit the leased property or other historic properties in the USPS portfolio. Due to its financial and administrative constraints, leasing of its historic properties is not a practicable option.

As stated in the recent 2011 ACHP guidance for EO 13287, "local governments and organizations can be effective partners for developing plans to protect and use historic properties." By working with the planning, zoning, building code departments and local economic development authorities, the purchaser of a Postal Service property can align redevelopment with the desires and needs of the community. For historic post offices, this is especially important. The use of preservation covenants and easements encourages such collaboration.

When many historic postal facilities were constructed, they did not have to comply with current zoning and building codes. In addition, municipal redevelopment goals for the area may not have been consistent with current uses. The location of these buildings in many communities suggests their reuse will impact the community and its infrastructure. When city or town governments play a meaningful role in developing reuse options for these buildings, they will be more invested in the results and long-term preservation of these resources.

A state or local government entity may have future facility needs that could be accommodated by an abandoned post office or postal facility. The NPS Historic Surplus Property Program enables state, county and local governments to obtain historic buildings once used by the Federal government at no cost. This program, which is administered in partnership with GSA, enables local government entities to realize cost savings that make historic rehabilitation more cost competitive with new construction – the cost of the additional facility does not include property acquisition, only rehabilitation. Use of this program is not currently viable for the Postal Service due to its financial constraints and fiduciary responsibilities.

The Postal Service has been successful in transferring large properties with protective preservation agreements to private developers in Michigan, Florida, Maryland, New York, and Washington DC. In each of these cases, an 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.

CASE STUDY: Birmingham Post Office, Birmingham, MI

Like other central city postal facilities around the country, Birmingham Post Office functions were relocated to larger and more efficient mail processing and distribution centers, better aligning population changes within distribution districts. The USPS converted the Birmingham Post Office to administrative functions in 1990, but these functions were phased out in 2007. The building, which backs onto a vibrant downtown retail district, is generally regarded as an important landmark in Birmingham. The post office was designed in the Neoclassical Revival style by the Supervising Architect of the U.S. Treasury Department under the direction of Louis A. Simon. The construction of the post office in 1939-40 by the James I. Barnes Construction Company of Mt. Pleasant, Michigan was funded by the Works Progress Administration (WPA). The proportion and scale of the building, the classic use of dimensional stone and masonry, and the attention to setting is the product of careful planning, design, and execution.



Figure 5-1. Birmingham Post Office

The goals for the proposed reuse of the property included achieving a higher and better use for this building by transferring it to a new owner who could assume responsibility for its maintenance and develop it into a facility that would meet the needs of the downtown Birmingham real estate market. Additionally, the goal was to preserve the building's historic character-defining features, while meeting the requirements of both the Birmingham's Historic District Commission and the NHPA.

The USPS initiated consultation with the SHPO under Section 106 in 2009 for the purpose of transferring ownership of the former Birmingham Post Office to the Surnow Company. The former post office is situated within the boundaries of the city's Shain Park Historic District and appeared to be eligible for listing in the NRHP as a contributing resource. The SHPO was concerned that the sale of the property out of Federal ownership would leave it without any legally enforceable conditions to ensure its long-term preservation.

The Deputy SHPO stated that a preservation covenant would address their agency's concerns regarding long-term preservation and would be a more appropriate option

than a MOA, as implementation of the covenant would be considered a no adverse effect. The Surnow Company had the full cooperation of the SHPO with the terms and conditions of the preservation covenant following the sale and necessary redevelopment approvals were received quickly (Dallan Wordekemper, personal communication 2011). The USPS transferred the property with a protective covenant, as the SHPO had concurred that undertaking would have no adverse effect on the Birmingham Post Office.

In a telephone interview on July 21, 2011, Jeff Surnow noted that during the planning and development stage, a number of architectural features of the original design were discovered – specifically the skylights (monitors), one of which was 1200 square feet. The infill that blocked the original clerestory skylights was removed and the skylights were restored. The ground floor featured the original maple wood floors. Although these were in poor condition, they were retained and restored as well.

Mr. Surnow was required to maintain three sides of the building. The fourth, or north/rear façade, that features the loading dock was converted into a new building entrance to provide direct public access onto the main downtown commercial district. The existing rear loading dock was glassed in and the existing circa 1980 carport was replaced with a new carport that incorporated a new handicap access ramp (Jeff Surnow, personal communication 2011).

Mr. Surnow noted that he does not have other buildings that offer such a dramatic interior space. The former post office retained its original 14-foot windows and 20-foot ceilings. New office space within the existing first floor and basement was constructed and a second floor was installed in the building envelope. A central staircase was installed creating an atrium space from the ground floor to the skylights 45 feet in height (Jeff Surnow, personal communication 2011). The mural titled, *The Pioneer Society's Picnic*, painted by Carlos Lopez located on the east wall of what was the lobby, was also retained and is the subject of a mural loan agreement from the Postal Service

Mr. Surnow stated that he could not recall working on another project where the construction workers would invite friends and family to show the building. He said many factors contributed to the project's success including the location, architectural features of the building, and the interior style/concept. Construction took ten months and currently ten companies lease space within the building. The uniqueness of the building project could be summed up in a final comment - one approaches a 1930 building, but enters in 2011 (Jeff Surnow, personal communication 2011).



Figure 5-2. Birmingham Post Office, Interior, Main Level during construction



Figure 5-3. Birmingham Post Office, Interior, Main Level after construction



Figure 5-4. Georgetown Post Office

CASE STUDY: Georgetown Post Office and Custom House, Washington, DC

The Postal Service has identified the Georgetown Post Office and Custom House, located in Washington, D.C., for possible transfer out of postal ownership. An imposing two-story edifice built in 1858 in the Greek Revival style under the direction of the U.S. Department of the Treasury, the Georgetown Post Office and Custom House occupies a small but prime piece of real estate in the heart of a bustling urban residential and commercial area in northwest Washington, D.C. The building is individually listed in the National Register, and a contributing property within the NRHP-listed and National Historic Landmark Georgetown Historic District. In spite of its central location, however, the building has been underutilized since the removal of the custom house functions to another site in 1967. At present, active postal functions only require use of the first floor, consisting of the public lobby and the work spaces in a 1926 rear addition. The second floor, formerly the custom house space, and the basement remain largely vacant.

Because of the population density of the surrounding area and the resulting high volume of pedestrian traffic, the local community has expressed a strong desire for postal functions to remain intact in this location. In response, the Postal Service is exploring the sale of the property to a party that would permit the agency to maintain a presence in the building through a condominium agreement.

In 2010, the USPS entered into negotiations with EastBanc, a respected local developer with extensive experience in the redevelopment of historic properties. Since that time, the Postal Service and EastBanc have been working together to determine a viable path forward for the Georgetown Post Office and Custom House.

In accordance with Section 106 of the National Historic Preservation Act, the Postal Service has identified the proposed transfer of the Georgetown Post Office and Custom House out of Federal ownership as an undertaking. Additionally, as a NRHP-listed property within the District of Columbia, alterations to the property are subject to the review and approval of the city's Historic Preservation Review Board as required by the

local zoning ordinance. Because the post office is located within the Georgetown Historic District, the project is subject to yet a third layer of review by the Old Georgetown Board of the U.S. Commission of Fine Arts, an advisory design review board established in the early 20th century for the purpose of safeguarding the character-defining aesthetics and design principles of the National Capitol.

The Section 106 compliance process has been a complicated one, beginning with the dual role of the Historic Preservation Division of the D.C. Office of Planning as both the State Historic Preservation Officer for Section 106 as well as the staff support to the city's Historic Preservation Review Board for local zoning purposes. Seeking to engage all legitimate consulting parties consistent with Section 106 regulations and in recognition of the active role of these organizations in such projects, the Postal Service has integrated a broad range of entities into the process, including the National Park Service, National Capitol Planning Commission, the Commission of Fine Arts and the Old Georgetown Board, the D.C. Preservation League, the Citizens Association of Georgetown, and the Advisory Neighborhood Commission 2E. In recognition of the historical significance of the Georgetown Post Office and Custom House, the ACHP has expressed an interest in the Section 106 process and has requested to be informed as it proceeds, although has not asked to be a consulting party.

During late 2009 and 2010, EastBanc coordinated multiple meetings with the SHPO, the Old Georgetown Board within the Commission of Fine Arts, neighborhood groups, including the Advisory Neighborhood Commission 2E, and participated in a March 22, 2010 public hearing at the National Postal Museum regarding the project. An initial redevelopment scheme proposing the construction of townhouses was developed. Later in the year, alternative schemes focusing on new office development use were prepared. On August 30, 2010 the Postal Service notified the SHPO that the circumstances under which the USPS would move forward had changed, and requested re-initiation of the Section 106 process. USPS proposed protective covenants that would specify adequate and enforceable restrictions and conditions to ensure the long-term preservation of the property's historic character-defining features. This correspondence noted that the new owners of the Georgetown Post Office would be subject to District of Columbia and federal agency laws and regulations, including the Shipstead-Luce Act of 1930 (enabling legislation for the Commission of Fine Arts) and the Old Georgetown Act of 1950 (enabling legislation for the Old Georgetown Board), and would be required to submit development plans to the D.C. Historic Preservation Review Board, providing further assurance that the undertaking would be adequately reviewed by historic preservation regulatory agencies. The SHPO indicated that this approach was acceptable and would fulfill the Postal Service's Section 106 responsibilities and result in a finding of no adverse effect on the historic property.

While it appeared that the Section 106 consultation process had been successfully concluded at this point, EastBanc encountered difficulties because of differing opinions provided by multiple local review agencies, including the Old Georgetown Board, on the proposed redevelopment. For example, one organization supported a fully-residential use, while others requested an office/residential use. In addition, the SHPO reversed their finding and suggested that the USPS instead use a Memorandum of Agreement, because the protective covenant, running with the land, created issues regarding

demolition in the context of federal historic preservation standards that would have to be followed. The SHPO also indicated that it would not support the revised Old Georgetown Board-approved design for the redevelopment.



Figure 5-5. Extension to US Custom House, Washington DC, c. 1920

In response, EastBanc and their architects, Core Group, prepared a new redevelopment scheme for the landmark property. This scheme, which included two variants – one for combined restaurant and office use, and one for just office use – incorporated the full building envelope as currently present on the site, including both the 1858 main block and the 1926 addition, and retained other historic features on the site including the brick paving and brick- and stone-masonry property wall. Interior changes proposed were primarily relegated to secondary spaces and those spaces that do not retain their historic integrity, while the primary, character-defining spaces in the building were to be left intact. Upon presentation of the revised scheme to the D.C. Office of Planning and Historic Preservation staff, it was agreed by all consulting parties that conclusion of the Section 106 process could be achieved through historic preservation covenants without a Memorandum of Agreement. As of October 2011, plans are proceeding along this path.

The case of the Georgetown Post Office and Custom House illustrates the commitment of the Postal Service to find and work with a viable purchaser willing to support preservation of the building in response to strong public sentiment. This has resulted in a viable redevelopment scheme that meets the varied goals of the numerous stakeholders in the process.

CASE STUDY: Palm Beach, FL

The Palm Beach Post Office was constructed in 1937. This Spanish Revival style facility represents an important period in the history of government architecture, when hundreds of such buildings were constructed in smaller communities throughout the

United States. Despite its relatively modest design, the Palm Beach Post Office is a well-preserved example of public architecture which successfully accomplishes the intentions of its designers to convey dignity and formality. This is conveyed through an elaborate entrance and a lobby rich with architectural components, including its original lobby artwork -- three historic murals by artist Charles Rosen. The property was listed in the National Register in 1983 and is a designated local landmark under the Town of Palm Beach Historic Preservation Ordinance.



Figure 5-6. Palm Beach Post Office

After the Postal Service initiated the Section 106 process, a prospective new owner for the property was identified. Future design plans for the building initially included the removal of *Seminole Indians & Two Landscapes*, a three-mural piece installed in the main public lobby in 1938, a historic character defining feature which would have an adverse effect on the post office. The USPS initially planned to develop a MOA that contained mandatory design review by Florida SHPO in perpetuity.



Figure 5-7. Palm Beach Post Office Lobby, Charles Rosen Murals

In February 2010, the Postal Service formally initiated the Section 106 process. The Postal Service determined that the project would have no adverse effect on historic properties because the historic character-defining features would be preserved through the use of protective covenants. The Florida SHPO responded in March 2010 with a request that the USPS “identify and list *the architecturally or historically significant exterior and interior features*” [their emphasis] of the property and “add them to the covenants.”

The USPS retained the services of qualified consultants that met the SOI’s *Professional Qualification Standards* (36 CFR Part 61) in Architectural History and History to assist in the analysis of the Palm Beach Post Office and identify its historically significant exterior and interior features. The resulting list of historic character defining features was incorporated into the Historic Preservation Covenants as requested by the Florida SHPO.



Figure 5-8. Palm Beach Post Office, Lobby Interior

The post office was sold to Jeff Greene. Mr. Greene said he planned to use the Mediterranean-style building to house the offices of his Palm Beach-based company, Florida Sunshine Investments, Inc. (Greene, personal communication 2011).

The Landmarks Preservation Commission (LPC) approved Mr. Greene’s renovations plans, prepared by the architectural firm Bridges, Marsh & Associates, which involve maintaining the building’s main lobby intact except for creating an opening at the existing client counter to lead into the workroom space. In the workroom area, bathroom facilities, office and support space, an open atrium *area* with skylights, and a mezzanine wrapping around on the north and south sides will be added for better space utilization. The exterior will remain as is with the exception of upgrading the fenestration as needed to match the existing fabric; the building will be painted; deteriorated plaster will be re-pointed; and the front door will be retained. The existing ramps on the rear elevation will be removed and replaced with steps and railings at the rear loading area.

Based on the March 16, 2011 meeting minutes, the LPC was “very pleased with the adaptive re-use” (Palm Beach LPC 2011).

5.4 Protecting Artwork: WPA Murals

The U.S. Treasury Department’s section of Fine Arts and Sculpture commissioned hundreds of artists to paint murals for post offices around the country. These murals, depicting local themes and historic events are characterized by the monumental figures of everyday people working, shopping, at leisure, or characters or events of local historic interests. The topics of these murals were selected by local citizens and the artists had to comply with their wishes. Although not considered social realism, these murals provide a perspective on American’s artistic tastes and values during the 1930s.

As part of the Postal Service’s stewardship of the murals under its control, these artworks are restored when resources are available. The following table contains a list of murals that have been restored, cleaned or inspected in the last 3 years.

Table 5-1. Post Office Murals restored, cleaned or inspected since 2008

	Year	Month	Location	Action		
1	2008	October	Long Beach, NY	Restored		
2	2009	March	Union, MO	Installed		
3			Chillicothe, IL	Inspected		
4		April	Monrovia, CA	Restored		
5		May	Smithfield, VA	Restored		
6			East Boston, MA	Inspected		
7		August	Virginia Beach, VA	Restored		
8			Portsmouth, OH	Restored		
9			Springfield, OH	Restored		
10		September	Culver City, CA	Inspected		
11			Chlesea, MI	Restored		
12			Evert Branch, Boston MA	Restored		
13	2010	March	Gambier, OH	Restored		
14			Yellow Springs, OH	Restored		
15			Marysville, OH	Restored		
16		April	Melrose Park, IL	Installed		
17		May	Waupakoneta, OH	Restored		
18		July	Grants Pass, Oregon	Restored		
19	2011	March	Hamilton, OH	Restored		
20			Coldwater, OH	Restored		
21			Paulding, OH	Restored		
22		May	Herrin, IL	Restored		
23			Geneva, IL	In progress		

Since 2008, a total of 17 murals in post offices around the country have been restored, with one being in the process of being restored. In addition, two murals have been installed and three have been inspected.

It is the goal of the Postal Service to protect these historic artworks and provide public access to these paintings, even after the post office building is sold. Postal Service policy states:

When murals from the Postal Fine Arts Collection cannot be housed in situ or regional postal retail space, it is the goal of the USPS to identify a public organization or institution that has the interest and demonstrates the ability to properly showcase the art locally and to maintain public access to the art.

When a post office containing a mural or murals is sold, a mural loan agreement is often entered into between the Postal Service and such purchaser. In other cases the mural may be removed from the building and re-installed in a public space in accordance with professional standards, such as those outlined by the American Institute for Conservation of Historic and Artistic Works. Typical conditions of mural loan agreements include insurance restrictions on use of the image, maintenance, protection, and restoration obligations. In other cases, murals may be relocated to nearby Postal Service facilities.

In the past 3 years, the Postal Service has entered into the following agreements regarding the protection and preservation of Post Office Murals.

Table 5-2. Loan Agreements for Artwork

Location	Loan Holder	Address	# of Units	Date of Loan
1. Phoenix AZ	City of Phoenix	522 N Central Ave	4 murals	7/31/2009
2. Monrovia CA	City of Monrovia & Monrovia Historic Preservation Group	321 S Myrtle Ave	1 mural	11/21/08
3. Palm Beach FL	Little Broad Beach Partners, L.P.	95 N County Rd	1 mural	2/3/2001
4. Terre Haute IN	Indiana State University	7 th & Cherry St	1 mural	7/66/2010
5. Birmingham MI & City of Birmingham Historic Committee	320 Investments, LLC.	320 Martin St	1 mural	4/27/2010
6. Beaufort NC	Town of Beaufort	701 Front Street	4 murals	6/28/2011
7. Boone NC	City of Boone	679 W King St	1 mural	9/19/08

CASE STUDY: Herrin Mural, Herrin, IL

The 2005 news article “Missing post office mural provides local mystery,” notes that author Mary Thompson had recently written a book titled “A Guide to Depression-Era Art in Illinois Post Offices”. While undertaking research for her book, Ms. Thompson discovered something interesting about Herrin’s post office art – it was no longer there. (Wiehle 2005).

The mural entitled “George Rogers Clark Conferring with Indians near Herrin” was commissioned to Gustaf Dalstrom for the lobby of the Herrin Post Office in Herrin, Illinois. The mural was installed in 1940 at a cost of \$600 and was funded under the Section of Fine Arts Program. The mural depicted George Rogers Clark talking with the area Kaskaskia tribe members in 1778. Records noted that the mural was destroyed during the 1964 renovations and expansion of the lobby.

Quoted in the 2005 news article, Ms. Thompson stated that, “at the time of the remodeling, [people] weren’t too interested in the artwork in post offices, so it’s possible that somebody just took it home” (Wiehle 2005). Her hunch was later validated, as it was learned that someone was, indeed, interested in the mural - the assistant postmaster at the time, Paul Popham, who salvaged the mural.

Tom Popham, Paul Popham’s son, retained the mural after his father passed away and took it with him when he moved from Herrin to Stillwater, Oklahoma in 1983. Tom Popham later found the 2005 news article, “Missing post office mural provides local mystery,” online and immediately issued a press release indicating the mystery had been solved (Dallan Wordekemper, personal communication 2011). Mr. Popham still had the mural in storage. In October 2008, he and his wife drove from Oklahoma to Chicago to deliver the mural to Parma Conservation. In November 2008, Parma Conservation decided to face the mural, temporarily gluing a protective cover to minimize loss of oil paint, and store it in a tube until funding was secured. The goal was to return the mural to Herrin in the best possible state of conservation (Dallan Wordekemper, personal communication 2011).



Figure 5-9. Herrin Mural at Parma Conservation pre-restoration

Over the years, the Postal Service had been actively seeking funding assistance for the restoration of the mural. In June 2010, the Postal Service requested the assistance of author Mary Thompson to help identify funding for the restoration. Ms. Thompson met with Mayor Vic Ritter and other interested groups including the Herrin Woman's Club.

Parma Conservation had quoted a cost of \$28,000 to restore the mural to the highest museum standards. The Postal Service working with the local Woman's Club was able to fund the restoration of the mural.



Figure 5-10. Herrin Mural during restoration at Parma Conservation

Parma Conservation President Elizabeth Kendall was quoted in a May 27, 2011 news article that “it took almost six months of work to restore with a staff of six people. We really put our hearts into it. We were so pleased and honored to be a part of it so future generations can enjoy it.” (Fitzgerald 2011). The mural was delivered by Parma Conservation for the May 26, 2011 dedication, (Dallan Wordekemper, personal communication 2011). Mr. Popham and his wife were in attendance at the ceremony.



Figure 5-11. Herrin Mural after restoration by Parma Conservation

6 Use of Historic Properties

The Postal Service uses its historic properties in a manner that supports the Postal Service's mission first and foremost. Given the fiscal constraints the Postal Service must engage in right-sizing of its operations even when such right-sizing impacts historic properties.

6.1 Condition of Historic Properties

The Postal Service evaluates the condition of its historic properties in the same on-going manner as it evaluates all of its properties. Each postal facility manager is responsible for maintaining its property according to agency rules and procedures. It is the overall impression of the FPO that the physical condition of historic properties owned by the organization has not been the subject of complaints by purchasers or the public. A more objective assessment is not possible due to the fact that condition assessments are done cyclically for properties owned by the Postal Service.

In addition to the input from the postal facility manager, the Postal Service monitors the condition of its overall building stock by using a software application called the Infrastructure Condition Assessment Model (ICAM). This software functions as an analytical tool to allocate funding for maintenance and repair work to restore infrastructure assets to a desired level of condition. ICAM is used by a combination of professional building inspectors, maintenance professionals and Postmasters on a regularly scheduled basis. The results are used to build the repair and alterations budgets of each of the FSOs. Inspections are focused on "key systems" that can affect the ability of the facility to support mail operations (e.g. roof, parking areas, loading dock, HVAC, etc.) Historic buildings are included in this ICAM process and the functional systems contributing to an historic building's stability and longevity are monitored and repaired as needed.

Notwithstanding the likelihood of a property's selection for disposal, the property's systems are kept to a sufficient operating level in order for the building to retain its market viability and prevent structural damage.

6.2 Historic Property Use Policies

When property upgrades are needed to improve efficiency or meet operational needs, the Postal Service evaluates whether it is practicable to upgrade the existing facility or whether the better choice is to relocate postal services from the properties, including historic properties.

The 2008 EO 13287 report references the Postal Service considering available historic properties in individual host communities for possible Postal Service operations expansion. Since 2008, the Postal Service has much less opportunity to consider expansion into historic properties, due to the need to right-size to reflect declining revenues.

The Postal Accountability and Enhancement Act. Title III of the Act, Modern Postal Standards, contains Section 302: Postal Service Plan, which addresses facilities

management. The Act notes that the previous year's Presidential Commission on the Postal Service found "the Postal Service has more facilities than it needs and the streamlining of this distribution network can pave the way for potential consolidation of sorting facilities and elimination of excess costs." The facilities plan under Subsection C of Title III's Section 302 calls for "a strategy for how the Postal Service intends to rationalize the postal facilities network and remove excess processing capacity and space from the network" in addition to identifying "cost, cost savings, and other benefits associated with the infrastructure rationalization alternatives." The current asset management goals of the Postal Service clearly reflect this emphasis on addressing efficiencies of operations and cost savings.

The Presidential Memorandum of June 10, 2010, *Disposing of Unneeded Federal Real Estate*, addresses the effectiveness of previous efforts in decreasing the Federal government's real estate holdings. "Past attempts at reducing the Federal Government's civilian real property assets produced small savings and had a minor impact on the condition and performance of mission-critical properties. These efforts were not sufficiently comprehensive in disposing of excess real estate and did not emphasize making more efficient use of existing assets" (O'Keefe 2010)

The Presidential Memorandum continues by directing "executive departments and agencies (agencies) to accelerate efforts to identify and eliminate excess properties" including "accelerating cycle times for identifying excess assets and disposing of surplus assets" (O'Keefe 2010).

Much of the infrastructure of the Postal Service not only predates the internet, but also was built in response to different distribution realities and demographics. Although the Postal Service has often had to accommodate new technologies and changing demographics, current operational models, a decreasing market share and pressure for increased cost savings have created situations in which the small downtown post office is functionally obsolete and a regional distribution center on the outskirts of town can offer operational efficiencies and potential for consolidation of Postal activities.

The current emphasis on right-sizing and creating greater operational efficiencies does not diminish the Postal Service's commitment to stewardship of its historic properties. As in the past, the Postal Service develops plans that allow historic properties to be preserved in accordance with applicable provisions of the NHPA.

Primarily, the Postal Service's historic properties are post offices. A substantial number of the nation's postal facilities were built during the early 20th century and continue to be post offices. The 1902 Omnibus Public Buildings Act allowed Congress to authorize construction of numerous Federal buildings. Between 1900 and 1912, 200 out of the 727 new Federal buildings constructed were post offices (Causier and Juriewicz 2000). The 1913 Public Buildings Act mandated that the design of a post office be a function of the facilities revenue; the more money a post office brought in the more architecturally embellished the building. The subsequent McAdoo Classification System created many Class 2 post offices for small towns, "such as any businessman would consider a reasonable investment" (Causier and Juriewicz 2000) During the 1920s, post office plans were standardized and the majority of designs were completed by the Supervising Architect's Office. Roosevelt's New Deal and creation of the Public Works

Administration appropriated funds for the design and construction of a total of 406 post offices – nearly one-eighth of all PWA construction projects. The use of 11 standardized plans and “materials and products native to the localities” resulted in buildings that “proved economical and satisfactory...stimulating employment and spreading the benefits of the building program” (USPS 1982). Post WWII post offices often reflected the suburbanization of the country’s cities, becoming part of the car culture of efficiency rather than an element of a town’s civic center.

Historically, government, private agencies, and residences depended on postal service as the primary means of communicating and conducting business. In prior times, the post office was central part of people’s day-to-day lives as much as it was often a central part of a town’s civic center building stock.

6.2.1 Section 111 of the National Historic Preservation Act

The Postal Service responsibilities under Section 111 of the NHPA include, to the extent practicable, the development and establishment of alternatives for historic properties that are not needed by the Postal Service for its operations. (NHPA 1966: Section 111) At this time, adaptive reuse has been used in connection with disposals of certain historic properties. Leasing of historic properties to others has not been determined to be practicable for the Postal Service given budget constraints which make it difficult for the Postal Service to become a nation-wide landlord. Currently, the Postal Service has identified 2,491 properties that are listed in the NRHP or are possibly historic. These properties comprise approximately 29% of the master list of 8,989 owned or leased properties.

6.2.2 Disposal of Postal Service Buildings

Once the Postal Service has determined that a property is not necessary for postal operations, the assigned Realty Asset Management personnel initiate action on the property. Before taking any disposition action, Realty Asset Management must assess the developmental and/or joint-use potential of the property (USPS 2008a). The disposition of all Postal Service properties requires the completion of an environmental evaluation in accordance with Handbook RE-6, *Facilities Environmental Handbook*. Prior to disposal, other regulatory processes are commenced, such as notification under 39 CFR 778 to appropriate governmental officials, community consultation in connection with expansion, relocation or new construction of a Postal Service customer service facility, and Section 106 reviews.

When the Postal Service transfers a property to a non-Federal agency or party, and the property is listed in, or eligible for listing in, the NRHP, the Postal Service carries out Section 106 consultation as required under the NHPA. The Postal Service consults 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 historic character defining features of the property after transfer. The ACHP is notified of a property transfer by the Postal Service to another party if a MOA is developed under Section 106 of the NHPA. An MOA would typically be used if the USPS and the consulting parties agree that a preservation covenant is not the best alternative. Only

when all regulatory processes are completed will the Postal Service sell a property, whether or not historic.

6.3 Partnerships and Community Relations

As part of the regulatory process the Postal Service engages the community in connection with the possible relocation of a customer service facility. In addition, the Postal Service has implemented a process to notify the community of certain real estate actions in compliance with the Postal Accountability and Enhancement Act. Further, the Postal Service informs the public of its request for consultation under Section 106.

CASE STUDY: Morgan General Mail Facility Project, New York, NY

This project is noteworthy because it achieves two of the Postal Service's important goals – the preservation of historic properties, and carrying out operations in an increasingly sustainable manner. The Postal Service dedicated its first- and New York City's largest green roof-high atop the Morgan Processing and Distribution Center – also known as the Morgan General Mail Facility – on July 22, 2009. This project involved a \$63 million renovation of the existing 2,200,000 square-foot building in midtown Manhattan. The ten-story main facility with appended six-story wing occupies the entire block bounded by Ninth and Tenth Avenues and West 29th and West 30th Street. It is connected to the Farley Complex by a tunnel. Constructed in 1933 over part of New York Central rail yards, the ten-story building was determined NRHP-eligible by the SHPO as significant under Criterion C as a significant example of the many postal facilities associated with the New Deal-era building program. The six-story building constructed in 1992 connects to the 1933 building via an enclosed bridge over West 29th Street.



Figure 6-1. Morgan General Mail Facility

One component of the green retrofit project included the replacement of 1,500 historic steel single pane windows in the north building with new, more energy efficient aluminum double glazed thermal windows. The historic status of the building required the design for the replacement windows to match the visual sightlines and narrow mullions of the existing single panel steel windows. The design also involved refurbishing of the decorative cast iron spandrel panels.

When the 109,000 square-foot roof was inspected for a 2007 scheduled replacement, it was determined to be strong enough to support the weight of the soil, vegetation and other requirements of a green roof. The design included an open paved piazza (10,000 square feet) including benches, trees, and walking path over a new PVC roofing system. The fourteen orange-hued Ipe Brazilian wood benches were made from lumber certified sustainable by the Forest Stewardship Council and require no maintenance, sealants or staining. All plants and vegetation are native to the region and make up approximately 59 percent of the roof. Native plants and ground cover include: *Coral Carpet*, *John Creech*, *Weinhenstephaner*, *Immergrunchen*, *Fudaglut*, and *Red Carpet*, (USPS 2009).



Figure 6-2. Morgan Green Roof

The green roof benefits the environment and the Postal Service. The roof will last up to 50 years, twice as long as the roof it replaced. It will also reduce the amount of contaminants in stormwater runoff flowing into New York's municipal water system by as much as 75 percent in the summer and up 40 percent in the winter. "The green roof is more energy efficient than a traditional roof, and is projected to save the Postal Service \$30,000 yearly on heating and cooling costs," (USPS 2009).

The project reflects the Postal Service's commitment to create sustainable spaces and facilities. The facility was submitted for LEED-certification upon completion. The 2.5 acre seven story high green roof offers panoramic views of midtown Manhattan and the

northern New Jersey shore. In a 2009 USPS news release, Mr. Sam Pulcrano, USPS's Vice President of Sustainability, was quoted saying "the Morgan green roof is the largest in New York and one of the largest in the country, [and] not only does it provide employees with a beautiful, serene outdoor environment, the green roof will help us meet our goal to reduce energy usage 30 percent by 2015" (USPS 2009).

CASE STUDY: 450 Lexington Avenue Windows, New York, NY

For a project in mid-town Manhattan, the glass used in this building's windows became an determining factor of the interior space market value. If the 1930s-era opaque glass was changed to clear glass to provide more natural light and better views of mid-town, the rental value for the space would increase. The Postal Service studied various options and worked with the NY SHPO to find a solution that would not change the overall aesthetics of the windows and building of a single floor's exterior, and also not negatively impact the market rental value.

Designed by the collaboration of firms Warren and Wetmore and Reed and Stem, the Grand Central Terminal Post Office at 450 Lexington Avenue was constructed between 1906 and 1909 and represents a highly successful integration of road and surface transportation with rail and pedestrian movement. Situated diagonally northeast of Grand Central Terminal, the extensive building is one of the few remaining examples of an early restrained Beaux-Arts-style building in New York City. The post office was part of the New York Central Railroad "Terminal City" development plan for midtown Manhattan that centered on the 1913 Grand Central Station. The building was modified over the years, most substantially in the late 1980s and early 1990s with the addition of a 40-story office tower on top of the building.



Figure 6-3. Grand Central Terminal Post Office

In 2010, the Postal Service considered leasing the fourth floor of the post office. The estimated rental cost per square foot would increase if the circa 1938 opaque glass

window panes were replaced with clear glass panes, providing more natural light and views of midtown Manhattan. The Postal Service was uncertain whether these windows were significant historic features of the building, and contracted with a firm with architectural historians and historians who met SOI's professional qualification standards to undertake this study.

While compiling data for the study, it was determined that the Grand Central Terminal Post Office building was not yet listed in the NRHP. A nomination was prepared in 1982 and was signed by the New York Deputy State Historic Preservation Officer, but it was not certified by the Keeper of the National Register. A 1984 MOA for the construction of the 40-story office tower stated that the USPS considered the building eligible for listing in the National Register and stipulated cleaning, repair, and preservation of the Lexington Avenue and East 45th Street façades of the 1909 building as part of the tower construction project.

The opaque glass windows of the building were installed as part of a 1937-1938 renovation, after the USPS acquired the building from the New York Central Railroad in 1932. Prior to this renovation, all the windows contained clear glass, as exhibited in historic photographs. Although the window glazing was changed within the period of significance, based on thematic aspects of building's significance, and little to no reference to the reglazing in the existing literature and historic record, it was determined that the opaque glazing, in and of itself, was not a character-defining feature of the historic property.

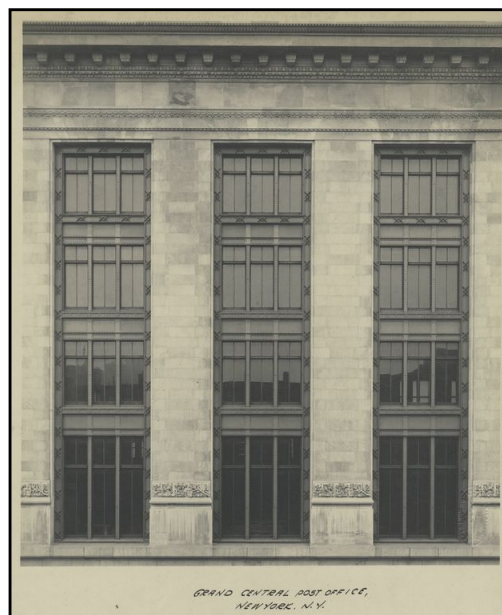


Figure 6-4. Detail of current window frame and glazing (left), and detail of window frame and glazing in 1908 (right), shortly after completion

Returning the fourth-story opaque window panes to their original clear finish would create a visual effect similar to the original windows before the 1937-1938 reglazing. However, because the installation of glass on the fourth story was visually inconsistent

with that of the remaining stories, the undertaking could disrupt the aesthetic and visual continuity of the historic façades, and potentially have an adverse effect on the Grand Central Terminal Post Office. In addition, this would be inconsistent with the 1984 MOA's stipulation that new work harmonize with the existing character of the façades. The contractors recommended that the Postal Service consult with the SHPO on whether an adverse effect on the historic property would be avoided if the lease for the space required that the lessee replace the existing fourth-story window glass with a tinted glazing product that would have similar aesthetic and reflective qualities to the remaining extant 1937-38 façade windows, as viewed from the street level.

The contractor suggested an option involving the installation of clear glass with an applied coating or tint, or glass manufactured with a tint. This option could provide ample light and acceptable views of the surrounding area without creating a jarring disruption of existing light reflection properties. This option could be explored by contacting window glass fabricators and conducting on-site tests to determine levels of visual and reflective compatibility with the existing opaque windows at the lower levels. If a glazing product, or appropriate coating or tinting application could be found that is compatible with existing visual and reflective qualities of the building, avoidance of an adverse effect to the historic property would be possible. The Postal Service could affect this by conditioning the lease of the fourth floor space on the lessee installing this material. This may result in the SHPO concurring with the USPS's determination that the undertaking would have no effect on historic properties, as this undertaking would be consistent with the *Secretary of the Interior's Standards for Rehabilitation*.

The study and recommendations were submitted to the SHPO for review and comment. In a response dated May 13, 2011, the SHPO concurred with the Postal Service's determination that the proposed replacement of the glazing on the fourth floor with clear glazing would result in a determination of no adverse effect. The SHPO agreed that the use of the clear glazing would create somewhat of a hybrid glazing appearance on the building façade. However, the SHPO stated that it would prefer this alternative to the alternative of introducing yet another type of window glazing or the tinted glazing. It was the SHPO's opinion that it was most appropriate to keep what the Postal Service has or return to the original window appearance.

CASE STUDY: The Smithsonian National Postal Museum, Washington, DC

Constructed in 1914, the Washington DC Post Office Building operated exclusively as a postal facility until 1986, when postal operations were reduced to a retail presence. The building was designed by the architectural firm of Graham and Burnham. Burnham designed the adjacent monumental Washington Union Station.

In 1990, the Postal Service and the Smithsonian signed a 22-year sublease agreement, and moved the Smithsonian's stamp and postal history collection to the former Washington, D.C. Post Office Building, creating the National Postal Museum. The Smithsonian is responsible for the operational and maintenance cost for the subleased space, reducing the financial burden of the building on the Postal Service.

In September 2010, the Postal Service initiated Section 106 consultation regarding its plans to expand the National Postal Museum. Specifically, the undertaking proposed an

expansion of the National Postal Museum Gallery in an area that had been previously occupied by the Capitol City Brewing Company (CCBC).

Changes to the exterior of the building included a proposal to remove of two exterior stair entrances, construct an exterior canopy over the entrance, and remove exterior signage associated with CCBC as a tenant and return the building to its original grandeur. To better control temperature, humidity, light and security within the space, additional improvements were to be made to the mechanical system and modern thermal windows installed enhanced by postage stamp designs placed on the window glazing.

The Postal Service staff met with the DC SHPO, representatives of the National Capital Planning Commission and the U.S. Commission of Fine Arts to discuss proposed modifications to the building. Postal Service staff also met with the Architect of the Capitol and the GSA concerning the proposed project. All agencies supported the undertaking. The DC SHPO concurred with the Postal Service's determination of no adverse effect in correspondence dated April 19, 2011.

The Smithsonian Institution will initiate project work shortly; this should take approximately one year to complete. This will result in an enhanced public visitation experience of the largest philatelic stamp collection in the world.

CASE STUDY: Rockville Post Office, Rockville, MD

This notable Post Office is an excellent example of the adaptive re-use of a historic building within a Maryland jurisdiction. Architecture of the town's civic center has been enhanced through this adaptive re-use project, with this Post Office continuing to maintain a civic function as part of Rockville's local government.

When the Neo-Classical Post Office opened in Rockville, Maryland in 1939 at the corner of Washington and Montgomery Avenues, the town celebrated with a parade and a reception. The Post Office was a WPA project, designed by Supervising Architect Louis A. Simon and Architect R. Stanley-Brown.



Figure 6-5. 1939 Rockville Maryland Post Office.

One of three “New Deal” federally funded post offices built in Montgomery County, the dressed gray limestone and classical lines of the building are similar to the 1931 County Courthouse across Montgomery Avenue. . The post office was listed in the NRHP in 1986 as a contributing resource in the County Courthouse Historic District. With the construction of a new post office several blocks away on Rockville Pike during the

1970s, the 1939 Post Office gradually decreased its postal services function, and as it was a property managed by the GSA, accommodated other Federal government functions, such as a local U.S. Marine Corps recruiting office until it was eventually vacated.

In 2008, the City of Rockville had the opportunity to acquire the 1939 Rockville Post Office from GSA, for Homeland Security-related use. Rockville had been looking for a new and larger home for the Police Department, which was housed in the basement of City Hall. For the property to be transferred from Federal ownership to a non-Federal entity, and be considered a no adverse effect under Section 106 of NHPA, “adequate restrictions or conditions are included [in the transfer instrument] to ensure preservation of the property’s significance historic features” (City of Rockville 2011). The City of Rockville negotiated a preservation easement with GSA and the Maryland Historical Trust (MHT). As the SHPO, the MHT administers the NHPA Section 106 program for the State of Maryland.



Figure 6-6. Proposed conversion of Rockville Post Office to City of Rockville Police Department and Annex

The City of Rockville pursued development of the rehabilitation and reuse plans congruent with the easement negotiations. The city wanted to ensure the building and site could be rehabilitated for use as the Rockville Police Station prior to acquiring the property and committing financial resources to the project. The post office building and site were deeded at no cost to the City of Rockville by the Federal government with the stipulation that the building would be used in perpetuity for a homeland security-related purpose. The City of Rockville invested \$6.4 million in the project, which includes the rehabilitation of the 11,415 square-foot historic building and the construction of a 14,538 square foot rear annex, which will have a green roof. The public lobby of the building, which features marble wainscoting and the WPA mural, will function as public reception area for non-security related police department functions, such as acquiring a dog license or paying a parking ticket. The rehabilitation of the building retains the character-defining features of the contributing resource in the NRHP Courthouse Square Historic District.

6.4 Mural Restoration Projects

The Postal Service owns a substantial collection of artwork that tells the story of America through the eyes of artists during the Great Depression of the 1930s. The Postal Service has devoted significant funds to protect and restore these works of art when necessary. The Herrin, Illinois case study described in Section 5.4 of this report is a representative example of projects that have taken place over the past three years.

Two Federal programs were responsible for the artwork placed in post offices. One program was created in 1934 as part of President Franklin D. Roosevelt's New Deal by the U.S. Treasury Department, the Section of Painting and Sculpture and was dedicated to commissioning over 1,300 murals and 300 sculptures that were placed in post offices and other federal properties throughout the country (U.S. General Services Administration, 2011). Other artworks were created under the auspices of the Treasury Department's TRAP, which was established with a grant from the WPA in 1935 to employ artists listed on the Federal relief rolls. Works from these programs were placed in public spaces such as schools, court houses—including post offices.. 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).

Preservation of that portion of the New Deal Art Collection owned by the Postal Service is funded by the Postal Service, sometimes in partnership with local communities. Within the past three years, the Postal Service has successfully cleaned and/or restored 17 murals Reference the schedule that is shown elsewhere in this report. 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.

While it is the Postal Service's preference to keep these murals in their original locations (in situ), this is not always possible. On occasion, a mural will be relocated to another Postal Service facility or to a governmental building, such as a library or community center under a loan arrangement as previously discussed. Whether or not a property containing a mural changes ownership, the ownership of the mural remains with the Postal Service.

7 Summary Status of Preservation Program Efforts

Financial constraints over the years since the 2008 EO Report have prevented the Postal Service from expanding 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.

7.1 Postal Service Initiatives

Development of a Nationwide Historic Context Study that will look at the Postal Owned Facilities Constructed or Occupied between 1940 and 1971 will provide a comprehensive NRHP evaluation of materials for Post Office facilities dating from this period and provide assistance to the NRHP. See below for more details on this initiative.

The Postal Service has completed the update of certain handbooks and manuals to ensure Postal Service policies meet regulatory requirements. This is an on-going process and other handbooks and manuals are expected to be updated in the future. The revised documents will be available to all Postal Service employees on the internal Postal Service network.

7.2 Internal/External Education

The Postal Service continues to identify internal and external opportunities for cultural resource training for Postal Service employees. The Postal Service continues to train staff located in the seven FSO offices. Certain postal employees may also obtain information from courses offered by the ACHP.

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

7.2.1.1 History and Context Study of Postal Facilities Constructed or Occupied Between 1940 and 1971

The Postal Service issued a Request for Proposals in March 2011 for development of the above-referenced study. This study will include a review of the evolution of Postal Service facilities built or first occupied between a roughly 30 year span from the period just preceding World War II through the Postal Reorganization Act of 1971. The study has two stated objectives:

- Provide a recognized and acknowledged reference document that defines significant periods of operational changes and design of Postal Service buildings constructed between 1940 and 1971 on the national and regional levels; and

- Identify and evaluate significant architects as well as historic character-defining features, if any, of Postal Service owned/constructed buildings from the identified period

The principal focus of this work is the production of a technical study that can be used by the Postal Service, SHPOs, the Keeper of the National Register, the ACHP and members of the public to evaluate Postal Service properties within this temporal period for listing in the National Register. The Postal Service has requested that this study be completed in sufficient detail to allow its use as a reference tool.

Proposals from cultural resource management firms are now under consideration by the Postal Service, but it is anticipated that approval of one of the proposals will occur in late 2011. Work on this study should begin during the winter of 2011.

7.3 Preservation Program Issues

7.3.1 Staffing

The Postal Service has a total of 8 employees working on historic preservation matters. Two of the seven FSO historic coordinator positions are filled by individuals who meet SOI's Professional Qualification Standards (48 FR 22716; National Park Service 1983). The Postal Service also has one additional qualified architect who meets the SOI *Professional Qualification Standards*.

The Postal Service will continue to maintain and preserve all of its properties, including historic properties, as its financial condition permits. Future Preservation Program Plans

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

7.3.2 Improved Reporting Methods

The Postal Service will develop an internal database to collect information on Section 106 consultations, archaeological resources, and artwork restorations.

7.3.3 Preservation Education

The Postal Service will work on 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.

7.3.4 Tax Incentives for Rehabilitating Historic Post Offices

Postal Service buildings that are listed in or eligible for listing in the NRHP may be eligible for tax credits for certified rehabilitation projects. When a NRHP post office is sold out of Federal ownership, a knowledgeable developer can use tax credits to obtain a greater return on investment than otherwise through the use of these credits.

State tax credits and local jurisdiction property tax credits can also apply to a qualified project, if the state or local jurisdiction has these programs. In some areas, close to 50% of qualified project costs can be realized through tax credits by combining Federal, state and local financial incentives. By contacting the State Historic Preservation Office,

a potential developer of a postal facility or office can find out if these programs can work for their project.

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Web Sites

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National Register Information System (NRIS)

<http://www.nps.gov/history/nr/research/nris.htm>

U.S. Government Accountability Office

<http://www.gao.gov/>.

U.S. Postal Service

<http://www.usps.com/>.

U.S. Postal Service

<http://about.usps.com/who-we-are/financials/10k-reports/fy2013.pdf>

Appendix A

Inventory of Historic and Possibly Historic Buildings by State

State	Status of NHRP Listed and Possibly Historic USPS Buildings		
	NRHP Listed Buildings	Possibly Historic Buildings Eligible for Listing	Total
AK	1	1	2
AL	6	31	37
AR	16	17	33
AZ	5	5	10
CA	27	89	116
CO	14	13	27
CT	11	30	41
DC	1	3	4
DE	1	8	9
FL	5	23	28
GA	6	39	45
HI	2	1	3
IA	1	67	68
ID	12	4	16
IL	4	166	170
IN	0	80	80
KS	23	35	58
KY	6	45	51
LA	5	27	32
MA	29	57	86
MD	1	25	26
ME	8	23	31
MI	2	96	98
MN	2	47	49
MO	3	73	76
MS	17	27	44
MT	10	3	13
NC	3	33	36
ND	11	2	13
NE	15	20	35
NH	4	14	18
NJ	2	91	93
NM	2	1	3

State	Status of NRHP Listed and Possibly Historic USPS Buildings		
	NRHPListed Buildings	Possibly Historic Buildings	Total
NV	6	1	7
NY	142	92	234
OH	3	123	126
OK	7	39	46
OR	5	10	15
PA	3	179	182
PR	1	2	3
RI	1	11	12
SC	1	15	16
SD	1	20	21
TN	15	34	49
TX	8	105	113
UT	9	6	15
VA	1	47	48
VI	0	1	1
VT	0	9	9
WA	22	8	30
WI	32	30	62
WV	1	36	37
WY	10	4	14
Total	523	1,968	2,491