



November 5, 2013

VIA CERTIFIED MAIL / RETURN RECEIPT REQUESTED

Ann M. Yarnell
Facilities Environmental Specialist
United States Postal Service
P.O. Box 39430
Tampa, FL 33630-9430

Re: Request for Section 106 Consultation
Berkeley Main Post Office
2000 Allston Way
Berkeley, CA 94704

Dear Ms. Yarnell:

Thank you for including the Berkeley Architectural Heritage Association (BAHA) as a consulting party in the Section 106 process for the Berkeley Main Post Office (Post Office) and the opportunity to comment on the findings by the USPS, as outlined in the letter dated September 3, 2013, addressed to the State Historic Preservation Officer.

BAHA disagrees with the USPS finding of no adverse effect, since the proposed sale of the Post Office could have far-reaching implications for the entire Berkeley Civic Center Historic District, which is listed on the National Register of Historic Places (NRHP).

BAHA reiterates the Berkeley City Council's request that any action concerning the proposed sale of the Post Office be deferred for a one-year term in order to explore a negotiated outcome.

BAHA also concurs with the Berkeley City Council's statement that a Section 106 process cannot be lawfully completed without an environmental impact statement (EIS) as required by NEPA.

Furthermore, BAHA believes that a sale of the Post Office would be shortsighted and lead to long-term loss. The building should continue under Government ownership, its front part retaining the historic postal retail operations and the

upper story and rear part leased to various government- and non-profit agencies that are currently leasing privately owned space.

If a sale goes through, it should include a leaseback of the lobby area for retail Post Office operations for at least 50 years and preferably in perpetuity. Such an arrangement will ensure preservation of the historic use and character-defining features, as well as continued public access.

Before any sale of the Post Office takes place, a professional seismic assessment of the building should be completed.

Area of Potential Effects (APE). The alleged Area of Potential Effects, as shown by the blue boundary in Figure 2 of the USPS letter, is much too limited. The APE needs to be expanded so as to include all of the Berkeley Civic Center Historic District. BAHA agrees with the Berkeley Landmarks Preservation Commission (LPC) that selling off the Post Office could undermine the integrity of this National Register-listed historic district, whose components were painstakingly assembled over four decades with the goal of providing the residents of Berkeley with a public and civic core. The APE should also include the property containing the Berkeley Main Public Library, a National Register-listed facility located very near the Post Office.

Affected Historic Properties. The USPS letter erroneously identified only three potentially affected historic properties: the Post Office itself, the YMCA at 2001 Allston Way, and the former Federal Land Bank building at 2180 Milvia Street. However, the enumeration of, and assessment of effects upon, specific historic properties should also include all of the other facilities identified as contributors to the National Register-listed Civic Center Historic District, such as but not limited to the Berkeley Community Theater and Old City Hall. Also included should be the former Armstrong College (2222 Harold Way) and Elks Club (2018 Allston Way)—both of which are City-designated landmarks and directly adjoin the Post Office—and the aforementioned Public Library.

Preservation Covenant. BAHA concurs with the Berkeley City Council that the preservation covenant should state explicitly that nothing in it limits the City's police power or exempts the owner from complying with local laws. The covenant should specifically address all the resources, including the artwork in its current location. All should be subject to strong and clear controls that would permanently guarantee protection for all the historic character-defining features and prevent the possibility of inappropriate work, alterations, or uses that do not meet the Secretary of the Interior's Standards.

In order to facilitate enforcement of the preservation covenant, the covenant should require an annual fee payable by the new owner for inspection of compliance, as well as attorneys' fees and cost if the City of Berkeley has to take enforcement action.

BAHA concurs with the LPC that the covenant agreement should be in perpetuity; that it should be transferrable, not dissolvable; and that it should be enforced by a coalition of agencies, in consultation with the LPC, with ongoing funding provided by the USPS.

Future Uses. In order to meet the Secretary of the Interior's Standard 1, the property should be used as it has been used historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships. The property is significant under National Register Criterion A within the historic context and significant historic theme of Politics/Government.

Additions/Alterations. Any addition, exterior alterations, or related new construction should be compatible with the historic materials, features, size, scale, proportions, and massing of the existing landmark property and surrounding historic district. Since the overall mass and scale of the Post Office building is identified as an exterior character-defining feature, it is critical that any alteration will not destroy this key feature of the property. Thus, any addition should be smaller than the original building in mass and scale and designed sensitively to reference the proportions, patterns, and elements found at the landmark property. Any addition and adjacent or related new construction should also be constructed so that, if removed in the future, the essential form and integrity of the property and its environment would be unimpaired. Any addition, whether vertical or horizontal, should also be set back an appropriate distance from the front and sides of the original building, so that the original form is preserved, and the addition reads as a secondary element. Current views of the Post Office façades shall not be obstructed by any new construction. The Preservation Covenant should clearly state that any exterior alterations, addition, or related new construction should not destroy historic materials, features, and spatial relationships that characterize the building, and should be compatible with the landmark property and surrounding historic district.

Character-Defining Features. BAHA concurs with the list of Revised Historic Character-Defining Features submitted by the LPC in an attachment to its letter of September 30, 2013. The following features should be added to that list:

- David Slivka's "Post Office Activities" limestone bas-relief on the eastern wall of the loggia.
- The two-part composition and fenestration pattern of the southern one-story addition constructed between 1931 and 1932.

There should also be consideration for the spatial relationships around the building, including the open space that allows the building's entire exterior to be clearly visible from public streets, enhancing the property's sense of significance.

Should you have any questions concerning this letter, please contact the undersigned by email at baha@berkeleyheritage.com.

Sincerely,

Susan D. Cerny

Susan D. Cerny
Corporate Secretary

cc: Carol Roland-Nawi, State Historic Preservation Officer & Tristan Tozer, USPS Reviewer,
Office of Historic Preservation, 1416 9th Street Sacramento, CA 95814

Mayor Bates and Berkeley City Council, 2180 Milvia Street, Berkeley, CA 94704

Sally Zarnowitz, Secretary, Landmarks Preservation Commission, City of Berkeley, 2120
Milvia Street, Berkeley, CA 94704

Eric Angstadt, Director of Planning, City of Berkeley Department of Planning &
Development, 2120 Milvia Street, Berkeley, CA 94704

Al Minard, Chair, Alameda County Parks, Recreation, and Historical Commission,
Alameda County Administration Building, 224 West Winton Avenue, Hayward, CA
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Cindy Heitzman, Executive Director, California Preservation Foundation, 5 Third Street,
Suite 424 San Francisco, CA 94103

National Post Office Collaborate, PO Box 1234, Berkeley, CA 94701