



May 16, 2012

Caroline D. Hall  
Assistant Director, Federal Property Management Section  
Advisory Council on Historic Preservation  
1100 Pennsylvania Avenue NW, Suite 803  
Old Post Office Building  
Washington, DC 20004

Dallan C. Wordekemper, CCIM  
Real Estate Specialist/Federal Preservation Officer  
475 L'Enfant Plz SW, Ste 6670  
Washington DC 20260-1862

Maria R. Infanger  
Attorney  
USPS Law Department  
Procurement & Property Law Section  
475 L'Enfant Plaza, SW, Room 6107  
Washington, DC 20260-1127

**RE: Venice Main Post Office, 1601 Main Street, Los Angeles, CA**

Dear Ms. Hall, Mr. Wordekemper and Ms. Infanger:

On behalf of the Los Angeles Conservancy, I am writing to express our ongoing concern about the proposed sale of the historic Venice Main Post Office building located at 1601 Main Street in the city of Los Angeles, and the associated Section 106 process which has been initiated by the United States Postal Service (USPS). The Conservancy is an indentified consulting party for this Section 106 undertaking. Further, we are part of a coalition of organizations and individuals that have come together on this issue to ensure the historic Venice Main Post Office building is protected should it be transferred out of Federal ownership.

The Venice Main Post Office has been serving the community since its construction in 1939 as part of the Federal Works Progress Administration. The building is attributed to Louis A. Simon, who was the Supervising Architect in the Office of the Supervising Architect of the Department of the Treasury. Modernist artist Edward Biberman created a site-specific mural in the lobby of the Venice Post Office that depicts the early history of Venice. City founder Abbot Kinney is surrounded by images like the canals that he built

for the “Venice of America,” and a wooden roller coaster representing the amusement parks that once drew thousands to the seaside community.

Though we and others would like to see the building continue to operate as the Venice Main Post Office, we understand a decision has been made by the USPS to close and relocate its services to another nearby facility. Given this decision to vacate, we are strongly urging the USPS to do all it can do to ensure this historic building is protected in the future. We ask the USPS to be proactive in selecting an appropriate private owner who understands the significance of the building and can work with the community, to preserve the Venice Main Post Office building and maintain public access to the interior mural in the future.

### **I. Undertaking will result in an adverse effect**

The sale of the Venice Main Post Office Building out of Federal ownership is an adverse effect, as there currently is not an acceptable provision in place by the USPS to offer “adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property’s historic significance.”<sup>1</sup> Despite the USPS’s assertion, we do not believe the USPS’s draft covenant, if imposed, would adequately “avoid adverse effects.” Therefore, as a consulting party, the Conservancy disagrees with the finding by the USPS that this undertaking will result in a no adverse effect.<sup>2</sup>

A draft covenant prepared by the USPS and provided to consulting parties requires the California Office of Historic Preservation (CA SHPO) to accept, monitor and enforce the covenant. The CA SHPO reportedly does not currently hold any covenants and has repeatedly stated to the USPS that it will not accept a covenant for the Venice Main Post Office building. With limited staff, resources, and broad geography to serve throughout the state of California, the CA SHPO cannot provide adequate monitoring and enforcement actions should they be required in the future.

The USPS formally consulted with the Conservancy through a conference call on April 17, 2012. Representing the Conservancy was Adrian Scott Fine, Director of Advocacy, and our invited guest, Elizabeth Merritt, deputy general counsel at the National Trust for Historic Preservation (NTHP). In the call the Conservancy and the NTHP stated our concerns with the no adverse effect finding, specifically regarding the CA SHPO’s unwillingness to accept the draft covenant provided by the USPS.

As part of consultation, the Conservancy and the NTHP suggested various alternatives and options for how the USPS might resolve these issues and ultimately provide adequate long-term protection for the building. This included offering the covenant to an appropriate and qualified third party entity, separate from the CA SHPO. Another entity may be more equipped to accept, monitor and enforce the covenant. The Conservancy currently operates a easement program and may be a possible recipient for a covenant, following further discussions with the USPS.

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<sup>11</sup> 36 CFR § 800.5(a)(2)(vii)

<sup>2</sup> USPS letter to CA SHPO, April 10, 2012

In addition, we discussed local landmark designation through the City of Los Angeles as another possible option that could be considered. The Los Angeles program would call for nominating the building as a Historic-Cultural Monument (HCM). Currently there are more than 1,000 HCMs throughout Los Angeles. Proposed changes and alterations to an HCM must be reviewed by the City's preservation architect to guarantee compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for Rehabilitating Historic Buildings*. This level of review and protection afforded through HCM designation could provide adequate long-term preservation of the Venice Main Post Office building.

Following a brief discussion by the participants on the conference call, the USPS stated these were not viable alternatives to the draft covenant prepared by the USPS, with representatives citing various concerns and issues.

## **II. Draft covenant by the USPS is inadequate**

The draft covenant provided by the USPS is problematic for a number of reasons. First, there is no entity currently willing to accept the covenant, much less provide monitoring and enforcement should it be required in the future. Second, the draft covenant requires additional language and clarifications to ensure it adequately provides a base level of long-term protection. Third, the draft covenant provides a reference to "historic features" but does not include any details for how these will be identified. The Conservancy recommends the USPS prepares baseline documentation of the Venice Main Post Office building by a qualified preservation professional that identifies features and character-defining elements.

While the Conservancy would suggest a more detailed and thorough covenant, we have reviewed the draft covenant provided by the USPS and offer some relatively minor revisions to better address the basic goals and intent of a covenant (please see attached).

## **III. Disposal of Venice Main Post Office building is proceeding without the completion of the Section 106 process.**

The USPS accepted formal bids for the purchase of the Venice Main Post Office building on April 23, 2012. To date there has not been any further consultation through the Section 106 process. The Conservancy is very concerned about the USPS proceeding with its sale of the Venice Main Post Office building. We are requesting the USPS, the CA SHPO, consulting parties, and the Advisory Council on Historic Preservation -- should it agree to participate -- to resolve the outstanding disagreements and continue consultation through the Section 106 process prior to any sale. A sale of this property should not go forward until the adverse effect finding and measures ensuring long-term preservation are appropriately addressed.

The Conservancy would like to work collaboratively with the USPS to seek an acceptable solution to these challenges. We firmly believe there are viable options and alternatives

that should be considered, addressing issues in Venice but also applying more broadly as best practices and approaches that may be applicable nationwide for the USPS. Other Federal agencies have successfully addressed similar issues with the disposal of historic properties in the recent past, including the General Services Administration and the Department of Defense.

Thank you and we look forward to discussing these issues further. Please do not hesitate to contact me at (213) 430-4203 or [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions or concerns.

**Los Angeles Conservancy:**

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 7,000 members. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural heritage of Los Angeles County through advocacy and education.

Sincerely,

A handwritten signature in black ink that reads "Adrian Scott Fine". The signature is written in a cursive, slightly slanted style.

Adrian Scott Fine  
Director of Advocacy

cc: John M. Fowler, Advisory Council on Historic Preservation  
James W. Coyne, USPS  
Tristan Tozer, California State Parks Office of Historic Preservation  
Milford Wayne Donaldson, California State Parks Office of Historic Preservation  
Ken Bernstein, Office of Historic Resources, City of Los Angeles,  
Jennifer Gates, California Preservation Foundation  
Elizabeth Merritt, National Trust for Historic Preservation  
Brian Turner, National Trust for Historic Preservation  
Amanda Seward, Venice Neighborhood Council  
Councilman Bill Rosendahl, City of Los Angeles,  
Rafi Nazarians, Office of U.S. Senator Barbara Boxer,  
Mike Davies, Office of U.S. Senator Dianne Feinstein,  
Jason Linde, Office of Congresswoman Janice Hahn  
Office of Congressman Henry Waxman