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Ann Sarver  
Facilities Environment Specialist  
6013 Benjamin Road, Suite 205  
Tampa, FL 33634

Re: Richmond Main Post Office, 1025 Nevin Avenue, Richmond, CA 94801  
Comment in response to Section 106 Consultation Notice dated August 17, 2017

Dear Ms. Sarver,

On behalf of Richmond Main Street Initiative, its board of directors, and the community we serve, I am writing to object to the USPS's finding that the sale of the Richmond Main Post Office will have no adverse affect on the historic properties of this building.

The National Historic Preservation Act regulations clearly state that a "change of the character of the property's use ... that contribute[s] to its historic significance" is an adverse effect (36 CFR Part 800 - Protection of Historic Properties).

The Richmond Main Post Office building was designed and constructed with the express and sole purpose of operating as a post office, which it has done since opening in 1939. Evidence of this can be found in the historic record as well as the Narrative Statement of Significance (Section 8) portion of the National Register of Historic Places Registration Form for the Richmond Main Post Office. Among other details, this narrative reveals that the "Richmond Main Post Office was constructed in 1938, under the federal Public Works Administration (PWA)" as part of a national effort to increase federal buildings. (Section 8, Page 11-12)

Therefore the sale of the building and relocation of its retail post office operations, will wholly and completely change the character of the property's use, thereby adversely affecting the historic nature of this building.

Additionally, even with a preservation covenant in place, there is no guarantee that the historic features of the building will be preserved. We've seen this happen in other communities. The purchase of the Venice Post Office by Hollywood producer Joel Silver offers an example of how private ownership of an historically significant post office has been detrimental to the integrity of the building; despite a preservation covenant, the building was used as collateral on failed business ventures, which resulted in the building sitting vacant and becoming a target for blight for years.

The Richmond Main Post Office is a spectacular example of Art Deco architecture, is a rare example of a building that has retained both its original form and function, and

serves as a landmark for residents and visitors. The relocation of retail operations and the proposed sale of the building, raises serious historic preservation concerns. Downtown Richmond has already lost a large portion of its historic buildings; others have been abandoned or left vacant for many years, with owners who do not have the financial means or desire to restore them. A vacant post office would be a setback for Downtown's revitalization and retention of cultural heritage.

Furthermore, as outlined in the NHPA, one of the main goals of Section 106 is to ensure that a wide variety of alternatives are considered in order to avoid, minimize, and mitigate harm to the historic building. Throughout the public notice and comment period related to the relocation/closure/sale of the Richmond Main Post Office, alternative options--including leasing extra space or leasing the entire building--have not been communicated or seriously considered. These suggestions were brought up by the community at the May 30, 2017 Public Hearing, as well as via written comments submitted by the public during the subsequent public comment period. USPS has shown no interest in considering alternatives, such as leasing out extra space in the building, and therefore appears to be acting contrary to this portion of the Section 106 process.

Richmond Main Street also has concerns about the accuracy and comprehensive nature of the National Register of Historic Places Registration Form for the Richmond Main Post Office. Close review of this form reveals inaccuracies that are important in the consideration of the building's eligibility for sale and raises serious concerns about the postal service's commitment to adhering to the regulatory processes related to this matter.

In two places the form lists the building as vacant:

1. Sections 1-6 page 3: Function or Use. Under Current Use section "VACANT/not in use" is used
2. Section 7 page 6: Narrative Description, Interior: The first paragraph describes the layout of the building and states that "The building is vacant as of January 2017".

As the USPS is surely aware, this building is currently owned by USPS and operating as a fully functioning USPS post office. If the vacancy status has any impact on the Section 106 process, this factually inaccurate designation of the building as vacant or not in use must and should be corrected.

Other details related to the historic significance of the building have been omitted from the form, resulting in an inaccurate classification of the building's eligibility for the National Register under Criteria C. The following historically significant associations entitle the Richmond Main Post Office for additional criteria designations:

Criterion A: Property is associated with events that have made a significant contribution to the broad patterns of our history.

The Richmond Main Post Office

- Served as air raid shelter during WWII;

- Served as the site where people of Japanese descent, including those who were U.S. citizens, were required to register as enemy aliens;
- Served as headquarters for a special wartime census which showed that Richmond's population had soared from 23,000 in 1940 to 114,899 just two years later;

These three examples solidly connect the building to the larger WWII historic context and contribute to the city of Richmond's narrative and cultural identity as a Home Front community and major contributor to the WWII effort.

Criterion B: Property is associated with the lives of persons significant in our past.

As demonstrated by Congressman Mark DeSaulnier, the Richmond Main Post Office is associated with the career or an important local community member and leader, as well as a USPS employee:

- Harold McCraw, Sr., a former Richmond Postmaster and community leader, is associated with this building. McCraw served 45 years with the U.S. Postal Service, working his way up to Richmond Postmaster in 1974; he was instrumental in creating opportunities for minorities in the Postal Service. Enclosed is a letter from Annie Jones, McCraw's sister, outlining his life story and career with USPS.

Accordingly, the form's current assertion that the post office is not associated with the career of an important economic, educational, or political leader in the community, state, or nation, is inaccurate.

We urge that the aforementioned sections of this form be updated to truthfully and more accurately reflect the building's current use and function, and its historic significance. Further we respectfully request that, with this updated information, the regulatory processes be revisited.

Richmond is woefully underserved in many aspects. Many groups are working together to change this. The preservation of historic buildings, especially those whose services are authentic to the original intention of the structure, are necessary for the cultural and historic identity of Richmond, as well as the equitable revitalization of our Downtown. The relocation, closure, and sale of the Richmond Main Post Office—the primary and most historically significant post office in the city—will add to this unfortunate trend.

Again, on behalf of Richmond Main Street and its community stakeholders, I object to the USPS finding that the sale of the Richmond Main Post Office will have no adverse affect on the historic properties of this building. I strongly urge the USPS to consider alternative courses of action that will maintain the building's current form and function.

Sincerely,  
  
Amanda Elliott  
Executive Director