

November 19, 2004

Mr. William Moncrief
United States Postal Service
Windsor Service Center
6 Griffin Road North
Windsor, Connecticut 06006-0300

Dear Mr. Moncrief:

Re: USPS
Relocate Main Post Office, Main Street
V/Aurora, Cayuga County
04PR3910

Thank you for requesting the comments of the State Historic Preservation Office (SHPO) for the United States Postal Service (USPS) proposal to relocate the Main Post Office in the Village of Aurora. This information was received October 25, 2004 and reviewed under Section 106 of the National Historic Preservation Act of 1966 (NHPA) and the relevant implementing regulations. Based on this review, the SHPO is pleased to provide the comments below.

1. As we understand it, this is a collaborative undertaking involving the Village of Aurora and the Aurora Foundation, which is itself a partnership between Wells College and a Wells alumna. The proposed relocation---which requires renegotiating a current USPS lease in effect until March 2009---is also part of a larger proposal that involves renovating both floors of the Foundation-owned Heary Building, demolishing the current Village-owned Post Office facility, expanding the parking lot onto the footprint of the existing Post Office and regrading the lot in a tiered fashion to address a parking shortage. All components of the project are located within the Aurora Village-Wells College Historic District, a remarkably intact resource listed in the National Register of Historic Places on November 19, 1980.
2. A November 2004 Aurora Foundation newsletter indicates the group has already begun work at the National Register-listed Heary Building: masonry cleaning, repointing, window replacement, new storefronts, a new front entrance, sandblasting of brick walls, the removal of a rear addition, and the salvage of architectural elements for eventual reuse in the first floor renovations are all cited. Although the USPS submission included no photographs or information about existing interior conditions, we can inform you that if this historic building's interior has been gutted as residents advise and a March 23, 2004 Auburn "Citizen" article indicates, the undertaking has already had an Adverse Effect and the SHPO's ability to consider project alternatives has been foreclosed. The replacement of windows and storefronts and the sandblasting of brick could also contribute to that finding.
3. This appears to be the same tiered parking proposal initially proposed as part of the Foundation's Aurora Inn project, which included the gutting of the Inn's intact interior, the removal of its historic additions, the demolition of the adjacent National Register-listed Vanderipe Market and the construction of a larger building on its general footprint. Despite counsel to the contrary in August 7 and 16, 2001 Department of Environmental Conservation (DEC) letters, that parking proposal was removed from the project after the SHPO advised that renegotiation of the USPS parking lease could trigger a review of all work under Section 106 and documents prepared by the Village during the State Environmental Quality Review Act (SEQRA) process indicate that the review of parking improvements and impacts would occur at a later date.
4. The sponsor's postponement of those improvements may be a second case of the foreclosure envisioned by Section 110(K) of the NHPA. (The first was the sponsor's removal of a proposed dock after our letters advised its inclusion would require Army Corps of Engineers permits which in turn would trigger a Section 106 review: the dock, which Wells officials acknowledge has been an important goal for more than 15 years, was reintroduced and Corps permits were requested after the controversial gutting of the Aurora Inn and the demolition of the Vanderipe Market, were complete.) By copy of a February 8, 2000 letter responding to concerns raised by Wells alumna Jane Reeves, the SHPO informed Wells President Lisa Marsh Ryerson of Section 110(K)'s proviso against federal assistance for sponsors who intentionally circumvent Section 106's procedures and adversely affect historic resources.

Based on the reintroduction of parking improvements that are similar to those initially proposed for the Aurora Inn project (and that can be carried out only if the USPS renegotiates its current lease and abandons its current facility), the SHPO can advise that the larger Aurora Foundation undertaking has already had an Adverse Effect on the National Register-listed Aurora Inn and the Aurora Village-Wells College Historic District. The gutting of National Register-listed buildings, or already-performed work whose effects are adverse, would also contribute to our finding.

5. Section 110(K) is clear that federal assistance is granted in only the most exceptional of circumstances. Given the well-documented history surrounding the Aurora Inn undertaking, and the significant issues of segmentation,

anticipatory demolition and foreclosure raised by many residents of the affected community in recent discussions for a re-introduced dock, it appears that Advisory Council on Historic Preservation regulations 36 CFR 800.9(c) provide the USPS with two options: if the USPS decides to pursue the relocation, your Federal Preservation Officer (FPO) must initiate extraordinary Adverse Effect consultation with the Advisory Council. In that scenario the USPS should provide information about current interior conditions and a history of your project involvement, specifically addressing Aurora Postmaster Dave Kulakowski's statements in a March 2004 news article that the relocation had been approved by your office. (Those statements may explain, in part, resident assertions that the move was presented at Village meetings as *fait accompli*.)

The USPS should also clarify Ms. Demaio's and Mr. McGrath's guidance when they met the sponsors on site in January 2004. Was the Section 106 review process explained and were the sponsors advised not to perform any work until it was complete? If the USPS's environmental responsibilities were not discussed it would be helpful to understand why; conversely, if they were discussed you should explain why the sponsor undertook work contrary to USPS counsel. In light of the January 2004 meeting, the USPS's June 23, 2004 letter to the Village, and the October 18, 2004 letter from the Aurora Coalition, we would also like to understand the sequence of events and what prompted the October 19, 2004 initial consultation letter (e.g. what information was the USPS waiting to receive before initiating SHPO consultation?)

Finally, e-mails, letters and phone calls received from Village residents indicate we may be in the midst of a public comment period that was not fully understood by all at the October Village Trustees meeting you attended. If the USPS decides to pursue the relocation, a renewed and well-publicized hearing and public participation process is warranted given the potential for controversy, the confusion surrounding the Postmaster's statements in March 2004, the project's linkage to parking improvements proposed as part of the Aurora Inn, the possibility of intentional sponsor segmentation and foreclosure, and concerns regarding a perceived reduction in ease of access under Americans with Disabilities Act (ADA) requirements. The Advisory Council can provide more guidance in this regard.

The SHPO asks that you keep us apprised of your involvement and copy our colleagues at the National Trust for Historic Preservation and the Preservation League of New York State on future submissions given their longstanding interest in the historic resources of Aurora. We appreciate the opportunity to comment on this undertaking. Please telephone me at 518/237-8643, ext. 3276 with any questions you may have. Please also refer to the PR# above in any future correspondence for this project.



Sincerely,

Richard M. Lord
Historic Sites Restoration Coordinator
(Richard.Lord@OPRHP.state.ny.us)

enc: November 2004 Aurora Foundation newsletter
SHPO 7/26/04 letter
NTHP 7/26/04 letter
PLNYS 7/28/04 letter

cc: Dallan Wordekemper, USPS Agency Preservation Officer
Aurora Coalition, P.O. Box 334, Aurora, New York 13026
Marilyn Fenollosa, National Trust for Historic Preservation
Daniel Mackay, Preservation League of New York State