

Office of the Mayor

October 18, 2013

Carol Roland-Nawi
State Historic Preservation Officer
Tristan Tozer, SHPO Reviewer
Office of Historic Preservation
1416 9th Street
PO Box 942896
Sacramento, CA 94296-0001

RE: Section 106 Consultation for the Berkeley Main Post Office
2000 Allston Way, Berkeley, CA 94704

Dear Ms. Roland-Nawi and Mr. Tozer:

The Berkeley City Council initiated section 106 consideration of the proposed relocation of the Berkeley Main Post Office at its regular meetings on October 1 and 15, 2013. Recognizing that USPS has consented to extend the section 106 comment period through November 12, 2013, and conduct a tour of the entire property prior to that time, the City Council anticipates sending supplemental comments by that deadline. In the meantime, however, the Council is providing the following comments for your consideration, based on information known to us at this time:

1. The City Council appreciates the USPS extension of time and offer to conduct a tour of the premises. The City Council reiterates its outstanding request that USPS agree not to advance its proposed sale and relocation of the Berkeley Main Post Office for a one-year term, to enable the consulting parties to explore a negotiated outcome. For the immediate moment, now learning that USPS has listed the property for sale, the City Council requests that USPS commits that as long as the section 106 process remains open, USPS will not enter into a contract for sale or lease of the property, or purchase or lease of a replacement postal facility; and in any event without 30 days' notice to the City Council.

2. The section 106 process cannot lawfully or practically be completed without preparation and circulation of an environmental impact statement (EIS) as required by the National Environmental Policy Act (NEPA). USPS' proposed sale of the property represents a major federal action that affects the human environment on at least these fundamental grounds: potential loss of exterior and interior historical features in the property; potential loss of integrity to the public uses embraced in the National Register

Civic Center Historic District; impacts on neighboring properties and uses. The EIS will enable a public process that identifies alternatives to sale, including sale with specific conditions to respect and continue the property's public and postal use.

3. The area of potential indirect effects should be expanded to include all of the existing Civic Center Historic District, and all of the properties on blocks adjacent to the one on which the Post Office sits. For example, USPS has not currently included properties to the east on the adjacent block, nor has it included the entire Berkeley High School, an intense and sensitive land use directly across Milvia Street.

4. USPS has asserted as one unassessed alternative that in the absence of a sale the building will be "shuttered." There is no discussion or mitigation of the deterioration that is caused by vacancy of a building.

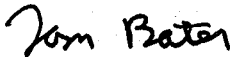
5. The City has numerous concerns about the terms and form of the draft covenant, were the property to be sold. The City would be happy to draft a revised covenant addressing these concerns, including, but not limited to:

- a. There are multiple resources: the building, the bas relief on the building and the murals. All should be addressed in the covenant; at a minimum the loan agreement should be part of the covenant, and the City as enforcing authority should have some meaningful role in protection of the resources subject to the loan (even if only as USPS's agent), and some way of obtaining prompt action by the USPS to enforce it.
- b. Term: Perpetuity or life of building.
- c. Resources: City should have enough resources to enforce the covenant including an annual fee on a per hour basis from the new owner for annual inspection and verification of compliance. In addition, the covenant should provide that attorneys' fees and costs and expert costs can be recovered from the buyer in the event the City has to take enforcement action.
- d. Use of building: The sale should include lease back of the lobby area for retail Post Office operations for a significant period (50 years). This eliminates many issues regarding access and protection of the murals.
- e. Access to Building: Access should include all parts of the front building and the rear addition. Any new use should be open to the public for hours similar to the current Post Office operation (six days per week during regular business hours).
- f. Reservation of police power: The covenant should state explicitly that nothing in it limits the City's police power or exempts the owner from complying with all local laws.

6. The list of consulting parties should be expanded to include the Post Office Collaborate, a nonprofit organization that is headquartered in Berkeley, with a post box in the Berkeley Main Post Office, and which is working nationwide to preserve the historic and community uses and resources in USPS properties.

In addition, at a special meeting on September 23, 2013, the Berkeley Landmarks Preservation Commission (LPC) took action authorizing the LPC Chair to submit the attached letter and comments to the United States Post Office as part of the Section 106 consultation process. As the City's Chief Elected Local Official I am also transmitting the LPC's letter and attachments, which includes their recommendation and comments.

Sincerely,

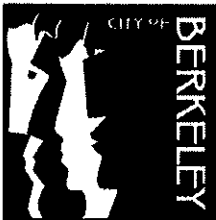


Tom Bates

Mayor

Enclosure: Letter and Attachments by Certified Local Government Historic Preservation Commission

cc: Ann M. Yarnell, USPS
Christina Morris, National Trust for Historic Preservation
Jacqueline McCormack, National Post Office Collaborate



Planning and Development Department
Land Use Planning Division

September 30, 2013

Attn. Ann M. Yarnell
United States Postal Service
PO Box 39430
Tampa, FL 33630-9430

Re: Request for Section 106 Consultation
Berkeley Main Post Office
2000 Allston Way
Berkeley, CA 94704 ("the Property")

Dear Ms. Yarnell,

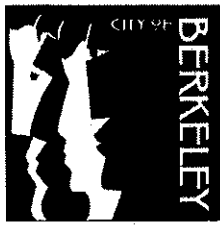
The Landmarks Preservation Commission (Commission) received the United States Postal Service (USPS) Request for Section 106 Consultation on September 10, 2013, and is grateful for the opportunity to participate in the process as a consulting party. At its September 12, 2013 meeting the Commission appointed a subcommittee to review the Section 106 documentation and analysis. At a special meeting on September 23, 2013 the Commission held a public hearing, considered public comment including the correspondence attached to this letter (Attachment 2), provided comments and voted 7-0-0-2 (Ruegg and Ng absent) to authorize the Commission Chair to include the comments in this letter signed on its behalf.

Undertaking

The Commission concurs with the USPS that pursuant to 800.3(a) the potential sale of the Property is an undertaking with the potential to cause adverse effects on historic property. As noted in the documentation, the Property was designated a City of Berkeley Landmark in 1980, and listed on the National Register of Historic Places in 1981 under Criteria A and C. The Property was assigned status on the National Register as a contributor to the Berkeley Historic Civic Center District in 1998, and was also listed on the California Register of Historical Resources. The Commission also found the description of the Property on the updated California Department of Parks and Recreation (DPR) 523A form accurate, while recommending revisions to the Historic Character Defining Features for the Property (Attachment 1).

Area of Potential Effects (APE)

The Commission firstly concurs with, and adds to, the APE for direct effects as the Property and any immediately adjacent property, including: 2000 Allston Way – Berkeley Main Post Office, 2001 Allston - Way Young Men's Christian Association, 2180 Milvia Street – Federal Land Bank; and additionally 2222 Harold Way – Armstrong College, 2018 Allston Way – Elks Club, and 2090 Kittredge Way - Berkeley Public Library. The Commission noted that the potential for adverse effects to the Property as a result of any non-compatible seismic retrofit work not reviewed for conformance with the Secretary of the Interior's Standards should be considered. The Commission secondly contends that because the National Register nomination found that the Berkeley Historic Civic Center District "has been intimately intertwined with the political/social history and welfare of the city," the complete Berkeley Historic Civic Center



Planning and Development Department
Land Use Planning Division

District should be included in the APE for indirect effects because of the potential to introduce visual or other elements which diminish or alter the setting and integrity of the district.

Determination of Effect

The Commission is concerned that currently the National Register Berkeley Historic Civic Center District, which was assembled only after 40 years of purchasing land and building out the parcels surrounding the park at the center according to the vision, retains a high degree of integrity, even after 60 years, and that the sale of the parcel and the uncertain future of the building and the site once in private hands, could undermine the integrity of the entire District. The Commission agrees in concept that a preservation covenant could ameliorate the potential for direct and indirect adverse effects within the APE, including: the Berkeley Main Post Office building and associated artwork in its current location. However, the overriding concern on the Commission lies in the preservation of the Historic Character Defining Features and public access to the civic function of the building in perpetuity, preferably through a lease back to the USPS, which would preserve its civic and historically appropriate cultural use. The Commission is concerned that the preservation covenant and agreement for loan of artwork as drafted appear to allow for the dissolution of the intention to prevent adverse effects to historic properties. It is recommended that the preservation covenant include the artwork in its current location, that the agreement be in perpetuity, and be transferable, not dissolvable and be enforced by a tripartite coalition of: a responsible non-profit organization with historic preservation at its core, a state agency, and a local preservation agency. Such enforcement should be carried out in consultation with the Commission, with ongoing funding provided by the USPS.

For the above reasons, the Commission disagrees with a finding of no adverse effect, and requests continued consultation to resolve the potential for adverse effects to historic properties as a result of the proposed sale of the Property. Should you have any questions concerning this letter, please contact Landmarks Preservation Commission Secretary Sally Zarnowitz, (510) 981-7429 or szarnowitz@cityofberkeley.info

Respectfully Yours,

A handwritten signature in black ink, appearing to read "Austene Hall", with a long horizontal line extending to the right.

Austene Hall, Chair
City of Berkeley Landmarks Preservation Commission

Cc: Office of Historic Preservation
Mayor and Council

Attachments:

- 1) Revised Historic Character Defining Features
- 2) Correspondence

ATTACHMENT 1

HISTORIC CHARACTER DEFINING FEATURES (REVISED)

2000 Allston Way

Berkeley Main Post Office

Revised Historic Character Defining Features

Interior features are the following:

- Glazed arches between workroom and lobby;
- Coffered lobby ceiling;
- Individual service counter windows with detailed ~~wood~~ oak framing, brass grilles and feather-chip e-glass grilles and service window doors;
- Suzanne Scheuer mural over former Postmaster's office door (~~Note that this mural will not be sold, conveyed or transferred out of Federal ownership. In the event that the Property is transferred out of Federal ownership, then the mural will remain in the Property subject to a loan agreement, a sample of which is attached to this letter~~);
- Arches around postmaster's door and service windows;
- Marble baseboards and wainscot;
- ~~Capitals and~~ Columns in lobby and small and large Corinthian capitals cast ceramic and ~~wood~~ oak;
- Band joining all columns and capitals of lobby (currently painted brown);
- Carved oak woodwork on columns between entrance doors, windows, service bays and vestibule;
- Entrance door ~~wood~~ oak frames with modified Corinthian capitals;
- ~~Wood~~ Oak and glass vestibule at center entrance;
- Carved ~~wood~~ oak and triangular dentilled pediment over Postmaster's former office door (now elevator door) and lettering;
- Post office boxes;
- Original bulletin cases;
- Oak casework with movable metal grills
- Marble staircase, oak handrail, and ornamental metal end pieces and railings; and
- Landing of marble staircase with mosaic tiles and black, white, and red fretwork around the edges.
- Second floor marble and tile flooring

Exterior features are the following:

- Height, mass and scale of building
- Hipped roof sheathed in tile with wide overhang;
- Exterior siding, including poured concrete, limestone, terra cotta trim, and rusticated cast blocks at corners;
- Rounded corners of two story portion of building on all four sides;
- Arcade of eleven high round arches on plan Tuscan columns;
- Loggia with groin vaults ;
- Marble on floor and wainscot of loggia;
- Original ~~wood~~ oak frame pane arches with functioning transom windows;
- Low cement windowsills with wave decoration;
- Ornate groove along the top of the exterior walls;
- ~~Modernistic~~ Pilasters along the primary façade ~~slightly above the roofline;~~
- Pilasters flanking the entrance doors;
- Entrance doors – three sets of paired oak and glass doors with brass fittings;
- Columns with pilasters capped with extremely stylized Corinthian capitals;
- Ornamental features of the exterior: small terra cotta frieze which tops the second story, wide terra cotta belt course with dentils, swags, medallions, and wave patterns below 11 second story windows and around the entire building; cornice soffit; terra cotta shields above rusticated cast blocks; two rows of curved wooden brackets framing rectangular panels at eave soffit and soffit paint colors; wrought iron railings with heraldic shields and diagonal rope pattern;
- Arched windows with terra cotta sills on one-story portion of building, and numerous windows continuing on west and east side with heraldic medallions and other decorative elements;
- Granite entry steps forming “plaza” at main (north) entry

Late Communications
Landmarks Preservation Commission

SEP 23 2013

RECEIVED
at Meeting

September 23, 2013

To: City of Berkeley's Landmarks Preservation Commission
Re: Section 106 Review of the USPS Proposed Sale of Historic 2000 Allston Way
Attn: Chair Austene Hall

Thank you for adding these brief comments to the public record. I am a resident of Berkeley, a renter at an apartment building near this historic post office. I am a regular patron of the post office, and an admirer of the beautiful New Deal art and architectural design. I strongly disagree with the erroneous analysis of the USPS official Ann Yarnell dated September 3, 2013.

This Commission should disagree with the conclusion of the USPS because it is inadequate, factually and legally flawed and deficient. The four step process of the 106 Review calls for this proposed sale to go to 'Step 4,' that is adverse effects need to be resolved including more inclusion of input from the public and the federal Advisory Council on Historic Preservation.

They agreed that their proposed transfer of a 100 year old historic building that was designed for public use including the post office constitutes an "undertaking," i.e. outside of federal ownership. Step 2, however is flawed, in that as a speaker at the hearing today noted, USPS failed to identify two adjoining historic buildings that would clearly be affected by a change in use of this building. Their Step 3 analysis is similarly flawed. They are required under 36 C.F.R. Section 800.3 to 'assess adverse effects,' which the USPS significantly failed in doing.

They dismiss any 'effect' because the referral to an 'unknown' and undetermined "protector of the covenant" has not been named, and would not include them. However, this building is a cherished historical monument worthy of a more thorough and complete analysis and assessment. The law requires that they consider any 'change in character of use of historic buildings.' However, they have not identified what new use the building would be, how the use of the building would change, etc. An empty promise of protection with a vague, and undefined 'covenant,' is worse than no covenant at all. It leaves a hole big enough to drive a huge high-priced housing development through.

The Step 4 should proceed, and this Section 106 Review should not be concluded. They cannot transfer or sell this property without adequate covenants (this is hard wired into the law).

Sincerely, Moni T. Law 2325 McKinley Ave, Berkeley (Cal Berkeley Class of 1982, USF
Law School Class of 1986, J.D., Washington State)



1010 Park Hills Road
Berkeley, CA 94708
September 23, 2013

Late Communications
Landmarks Preservation Commission

SEP 23 2013

RECEIVED
at Meeting

Landmarks Preservation Commission
c/o Sally Zarnowitz, LPC Secretary
Land Use Planning Division
2120 Milvia Street
Berkeley, CA 94704

RE: Request for 106 Consultation Berkeley Post Office

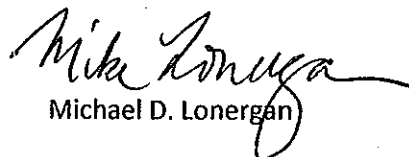
Dear Commissioners:

The USPS is today asking the City of Berkeley to approve draft covenant language enabling the USPS to sell one of the principal and defining buildings of Berkeley's Civic Center Historic District. Without knowledge of the seismic status of the building there is a high level of uncertainty on the impact that a sale into private hands will have on this historic building. It is foreseeable that a new owner will plead economic necessity to argue that completing a seismic retrofit requires sacrificing many historic features of the building including its current scale. On September 26, 2012, the City of Berkeley requested information on the seismic status of the building and on February 19, 2013, the USPS replied that they had no "responsive documents."

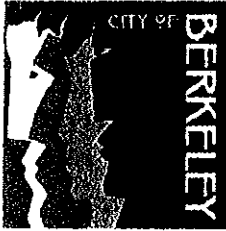
I strongly urge you to have a seismic report in hand before approving any preservation covenant.

Further I note that there is an artwork loan agreement covering the Scheuer mural but not the Slivka bas-relief. The language protecting these public works of art needs to be strong and clear. The commissions for both the Slivka bas-relief and the Scheuer mural stipulated that they were to be located in the City of Berkeley. They have been part of our cultural history for 75 years and the covenant and "loan agreement" must make clear that these two public works of art will always remain in Berkeley.

Sincerely,


Michael D. Lonergan

enclosures



Office of the City Manager

September 26, 2012

Ms. Diana Alvarado
Property Manager
USPS Pacific Facilities Service Office
1300 Evans Avenue, Suite 200
San Francisco, CA 94188-8200

Subject: Request for Information Regarding Berkeley Main Post Office

Dear Ms. Alvarado,

The City of Berkeley City Council will be conducting a Special City Council meeting on Thursday October 18, 2012 at 7:00 p.m. in the City Council Chambers located at 2134 Martin Luther King Jr. Way. The purpose of that meeting will be for the City Council to discuss the proposal by the United States Postal Service (USPS) to sell the Berkeley Main Post Office and relocate its operations elsewhere.

We understand that the USPS is required by law to conduct public meetings regarding the sale of its property. The City of Berkeley is amenable to the USPS utilizing the Special City Council meeting on October 18th as the forum for one of those public meetings. However, please be advised that the USPS remains responsible for providing the legally required public notice for its public meeting. In any event, USPS representatives are both invited and encouraged to attend the meeting in order to provide more information about the Service's plans with respect to this facility.

At that meeting, the City Council is also likely to discuss its response to the USPS's plans to sell the Berkeley Main Post Office. In furtherance of that discussion, below please find a list of documents that we hereby request be provided to the City prior to the October 18th meeting:

- a. Seismic status of the building including any engineer's reports or construction estimates of required work or approved plans for any retrofit work that has been conducted;
- b. Useable square footage;
- c. Interior floor plan, structural plan, foundation plans;

Page 2

September 26, 2012

Request for Information Regarding Berkeley Main Post Office

Mike
Sticky Note

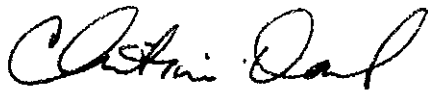
NEPA: National Environmental Policy Act requires the USPS to prepare EAs (Environmental Assessments) and EIS (Environmental Impact Statements) for proposed actions.

- d. Inspection reports of HVAC and Mechanical/Electrical/Plumbing systems including any estimates of remaining useable lifespan if they exist;
- e. Evidence of any roof replacements or repairs and/or reports on roof repairs required;
- f. Phase I and Phase II reports;
- g. Historical information or reports; and
- h. Any analyses or reports prepared pursuant to a review of the facility under CEQA or NEPA.

Finally, please note that the City of Berkeley is a Certified Local Government (CLG) in partnership with the State Office of Historic Preservation (SOHP) and the National Park Service. As a CLG, the City of Berkeley provides public participation by way of its Landmarks Commission public hearings related to Section 106 processes. Please confirm that the USPS, as lead agency, will involve the City of Berkeley and its Landmarks Preservation Commission as a consulting party in findings and determinations made during the section 106 process.

We appreciate your attention to our requests. Please let us know if you have further questions about the City Council meeting on October 18th, or require clarification about any of our requests. Either myself or Deputy City Manager William Rogers can be reached at 510-981-7000.

Sincerely,



Christine Daniel
City Manager

cc: Honorable Mayor and City Councilmembers
William Rogers, Deputy City Manager
Zach Cowan, City Attorney
Eric Angstadt, Planning Director
Mark Numainville, Acting City Clerk
Mary Kay Clunies-Ross, Public Information Officer

FACILITIES



RECEIVED
CITY MANAGER

2013 FEB 20 AM 10:59

February 19, 2013

Christine Daniel
Office of the City Manager
2180 Milvia Street
Fifth Floor
Berkeley, CA 94704-1122

RE: FOIA Case No. 2013-FPRO-00099

Dear Ms. Daniel:

This is in response to your Freedom of Information Act (FOIA) request, dated October 31, 2012, in which you seek access to Postal Service records.

You requested a variety of information related to the physical structure of the Main Post Office facility located at 2000 Allston Way. You further specified some specific types of information that you would like to receive. At this time, the Postal Service has located and is providing the following information.

- a. Requested Seismic Studies – (no responsive documents)
Requested Engineer's reports – (no responsive documents)
Requested Construction Estimates – (no responsive documents)
List of projects – (attached – 2 pages)
FMS Maintenance Report (attached – 1 page)
- b. Requested Useable Square Footage- see attached eDetail report (1 page)
- c. Requested Floor plan(s) – see attached Space Survey (6 pages)
Requested Structural plan(s) – (no responsive documents)
Requested Foundation plan(s) – (no responsive documents)
- d. Requested inspection reports for HVAC & Mechanical/Electrical/Plumbing – see attachment entitled Berkley MPO Scenario Baseline & Assessment Photos
- e. Requested information on Roof - see attached document entitled USPS Berkley Main Office, CA AIM
- f. Requested Phase 1 Report(s) – see Attached Environmental report (461 pages)
- g. Requested historical information / reports – see attached reports (158 pages)
- h. Requested Reports/Analyses per CEQA / NEPA – see attached PS Form 8194 (3 pages)
Also see attached "Review of Internal Report Docs..." (2 pages)

After a search of various potential sources for responsive information, the Postal Service has now provided you with all of the responsive documentation that the Postal Service has within its files. No available documents were withheld on the basis of any exemption.

The Postal Service does not consider this a denial of your request in that no records are being withheld. However, should you disagree, you have the right to appeal any of the items denied to your request in writing to the General Counsel, U.S. Postal Service, Washington, DC 20260-1100, within 30 days of the date of this letter. The letter of appeal should include statements concerning the denial, the reasons why it is believed to be erroneous, and the relief sought, along with copies of your original request, this letter of denial, and any other related correspondence.

Sincerely,

Jim Allen

Jim Allen
Program Analyst
Facilities Headquarters

Enclosures
cc: HQ Records.

Landmarks Preservation Commission
Sally Zarnowitz, Secretary
Land Use Planning Division
2120 Milvia Street
Berkeley, CA 94704

Late Communications
Landmarks Preservation Commission

September 23, 2013

SEP 23 2013

RECEIVED
at Meeting

Re: SECTION 106 REVIEW REGARDING THE MAIN POST OFFICE

Dear Commissioners:

This is to suggest some comments for use in Section 106 consultation about the Postal Service's proposal to sell off the Berkeley Main Post Office. (The remarks here are my own and don't purport to represent the position of any organization I happen to belong to.)

The documentation and analysis sent by the USPS are badly flawed, and the supposed finding of no adverse effect is unwarranted. Here are various more specific comments:

- **Inadequate "Area of Potential Effects."** The September 3 USPS letter's second page and the Figure 2 it refers to define an APE (Area of Potential Effects) that is much too small. It excludes *most* of the City- and National Register-designated Civic Center Historic District. Because this district by its very nature is and should remain a cohesive whole, no part of it should be excluded from the APE.
- **Failure to Consider Impact on the Elks Club and Armstrong College Buildings.** Although even the USPS's own alleged APE does rightly include the entire west side of Harold Way, the USPS letter fails to specify and discuss, as potentially affected historic resources, that frontage's Elks Club and Armstrong College buildings. This omission is particularly glaring because both those buildings are officially designated Landmarks and both of them directly adjoin the Main Post Office.
- **Vagueness About the Post Office's One-Story Wing.** The USPS letter's pages 6-7 and the accompanying "Preservation Covenant" purport to list the Main Post Office property's specific historic features. But while the listing of exterior features gets very detailed regarding the building's two-story part, it is relatively quite vague about the one-story wing. Is this vagueness meant to leave potential for a future owner to build something atop that wing?
- **Silence About the Property's Open Areas.** The listing of specific features says nothing about the Main Post Office property's *open* areas that adjoin much or all of the building's east, west, and south sides. These areas arguably are themselves important because they enable viewing the historic building's adjacent walls. Wouldn't this silence about the open areas make it easier for a future owner to build something sizable upon them and thereby block views toward the historic walls?
- **Failure to List Flooring of the Second Story's Hallway.** The listing of historic features does include "Landing of marble staircase with mosaic tiles and black, white, and red fretwork around the edges." But shouldn't it similarly list the original tile mosaic floor of the second story's *hallway*? That flooring can be seen in Photograph 19 on page 15 of the USPS packet's DPR Primary Record form.
- **Desirable Requirement to Retain Postal Operations at the Front.** Postal Service representatives have said they'd "prefer" that the building's sale include a leaseback proviso whereby a relatively small area, along the lobby, would continue to provide what the USPS calls "retail" postal services to the public. But shouldn't this be made a *requirement* within the Preservation Covenant itself? Keeping

such usage really is a “preservation” concern. A vital element of the building’s historic significance is the century-long, powerful tradition of myriad citizens going there to do postal business.

- **Preservation Covenant’s Worrisome Flexibility.** See how the proposed Preservation Covenant’s paragraph 3 says, “No construction, alteration or rehabilitation shall be undertaken that would affect the historic features of the property without prior consultation with, and the express permission of (*covenant enforcer name*).” That language apparently means the covenant enforcer would have undefined flexibility to “permit” changes that “affect” even the character-defining historic features. While the document’s paragraph 1 as such calls for compliance with the Secretary of the Interior’s Standards, those standards are generalized and could in practice get violated if the supposed enforcer were lax. Especially troubling is the Preservation Covenant’s paragraph 9, which says, “The (*covenant enforcer name*) may, for good cause, and following [quite undefined and possibly minimal] notice to the public, modify or cancel[!] any or all[!] of the foregoing restrictions upon application of the grantee, its heirs, successors or assigns.” Furthermore, the USPS letter’s page 9 describes the accompanying Preservation Covenant as just a “draft”—and that page’s last three lines even leave it quite unclear *who* would determine the covenant’s final terms.
- **USPS’s Dangerous Power to Appoint the Covenant Enforcer.** The letter’s page 9 says, “The USPS is actively seeking a preservation covenant enforcer for this property,” and evidently the enforcer would be picked by the Postal Service *itself*. With the goal in mind of maximizing potential sale proceeds, the USPS might favor a candidate who it tacitly assumes would, in the future “enforcing,” be helpfully lenient.

Sincerely,

JOHN S. ENGLISH

John S. English
2500 Hillegass Avenue, Apt. 3
Berkeley, CA 94704-2937