

ALAMEDA COUNTY COMMUNITY DEVELOPMENT AGENCY

Sandra Rivera Agency Director

224 West Winton Ave Room 110

Hayward, California 94544-1215

> phone 510.670.5333 fax 510.670.6374

www.acgov.org/cda

September 12, 2024

Susan Khang, Manager (A), Address Management Systems United States Postal Service, California District 2 3775 Industrial Blvd, Room 2071 West Sacramento, CA 95799-0043 susan.f.khang@usps.gov

Dear Susan,

By submitting this letter, the County of Alameda formally requests that the USPS implement an administrative change for the unincorporated communities of Ashland, Castro Valley, Cherryland, Fairview, Hayward Acres, and San Lorenzo to align Preferred Last Lines (mailing address "Place Names" or "PLLs") in those communities with Planning Area names and boundaries, as defined in the Alameda County General Plan. A list of the 30,201 addresses for which the County requests PLL changes is attached as **Attachment A**. A map of the impacted areas is included as **Attachment B**. A resolution from the Alameda County Board of Supervisors authorizing this request is included as **Attachment C**, and letters of support for this change are included as **Attachment D**.

BACKGROUND

In the unincorporated Alameda County communities of Ashland, Castro Valley, Cherryland, Fairview, Hayward Acres, and San Lorenzo (the "Project Area"), Preferred Last Lines (PLLs) and ZIP Codes assigned by the United States Postal Service (USPS) do not match municipal Planning Area community names and/or boundaries (see map in **Attachment B**).

"Planning Areas" are the official names and boundaries of the County's unincorporated communities, as defined in the Alameda County General Plan. USPS Preferred Last Lines (PLLs) are mailing address place names assigned by USPS to align with mail delivery routes. The USPS uses four PLLs in the urban unincorporated communities of Alameda County, associated with the four USPS branches serving the area: "Castro Valley", "Hayward", "San Leandro", and "San Lorenzo". In the Project Area, current USPS PLLs and ZIP Codes are:

Planning Areas	USPS Preferred Last Line(s) and ZIP Code(s)
Ashland	Hayward (94541), San Leandro (94578), San Lorenzo (94580)
Castro Valley	Castro Valley (94546, 94552), Hayward (94542), San Leandro (94578)
Cherryland	Hayward (94541), San Lorenzo (94580)
Fairview	Castro Valley (94552), Hayward (94541, 94542)
Hayward Acres	Hayward (94541)
San Lorenzo	Hayward (94541), San Lorenzo (94580)

DEFINING THE PROBLEM

The USPS established ZIP Codes and PLLs in the 1960s for the purpose of enabling quick and efficient mail delivery. Beyond their stated purpose, ZIP Codes and PLLs are also widely used by businesses and government agencies for geographic, economic, and demographic purposes.

USPS ZIP Codes and PLLs have become important social identifiers and key geographic units for data collection and analysis in the fields of marketing, real estate, public health, education, and more.

In unincorporated Alameda County, as in many municipalities across the country, USPS PLLs/ZIP Codes do not match official Planning Area community names or boundaries. This mismatch has resulted in longstanding negative consequences for the County's unincorporated communities. For example:

- Public health data are commonly collected by ZIP Code (and associated PLL). When ZIP Codes straddle jurisdictional boundaries, as in ZIPs 94578 and 94541, unincorporated community data are obscured by data from neighboring cities, impacting the County's ability to collect accurate, disaggregated demographic data for unincorporated communities.
- Many unincorporated-area residents have USPS PLLs associated with the neighboring cities of San Leandro or Hayward, negatively impacting unincorporated community identity. As a result, many residents are unaware that they live in unincorporated communities. This makes it difficult for unincorporated-area residents to locate and access essential government and emergency services and impacts their ability to engage in civic life and local decision-making.

IDENTIFYING A SOLUTION

Recognizing the wide-reaching impacts of this issue, USPS ZIP Codes and PLLs arose as a key concern of the Eden Area Livability Initiative (EALI). EALI was a community visioning process launched in 2012 by Alameda County District 4 Supervisor Nate Miley to improve the quality of life and health of the residents of the Eden Area, which includes the unincorporated-area communities of Ashland, Cherryland, Hayward Acres, San Lorenzo, and Fairview. In 2019, the EALI Phase II Governance Working Group began researching ZIP Code realignment for unincorporated Alameda County. The Community Development Agency (CDA) took over the project in 2022 and began discussions with USPS about the County's options related to ZIP Codes and PLLs.

In June of 2022, CDA provided USPS staff Dorothy Navarro with an initial estimate of 27,365 parcels impacted by mismatched PLLs. Based on information provided by USPS staff Dorothy Navarro, Julie Stanley, and Susan Khang, CDA established an outreach website with information in English, Spanish, and Chinese (www.acgov.org/cda/USPSproject), launched an online survey, and held <u>a series of community meetings</u> to present the community with three potential solutions:

• Option 1: Preferred Last Line (Place Name) Change

The unincorporated community Planning Area names would become the default USPS PLLs for each community. "Hayward" and "San Leandro" – city names – would no longer be default USPS Place Names in unincorporated Alameda County, but residents could continue to use old PLLs with correct street address and ZIP Code. ZIP codes and mail delivery routes would not change. USPS can offer this "administrative change" outside of any formal ZIP Code Realignment process, and USPS staff stated that they would be very likely to approve this change. No formal community survey would be required. Implementation timeline: 6 months from County request.

• Option 2: Alternate Preferred Last Line (APLL)

The USPS would recognize the unincorporated community Planning Area names as *optional alternatives* to existing USPS PLLs. The default USPS PLLs, ZIP Codes, and mail delivery routes would not change, and residents could use any approved PLL or APLL with the correct street address and ZIP Code. USPS can offer this "administrative change" outside of any formal ZIP Code

Realignment process, and USPS would be extremely likely to approve this change. No formal community survey would be required. Implementation timeline: 1 month from County request.

• Options 3: ZIP Code Boundary Realignment

The County could submit a request to the USPS to align ZIP Code boundaries and PLLs with Planning Area names. This option would require a formal application process, and the USPS would require the County to send a survey to all impacted addresses. 50% of surveys must be returned, and 50% of returned surveys must support the change. Supportive survey responses would not guarantee approval, and USPS would be very unlikely to approve a ZIP Code Boundary Realignment because it impacts the way mail is delivered. Implementation timeline: 1 year or more from County request.

The County's outreach efforts indicated support for pursuing either Option 1 (PLL change) or Option 3 (full ZIP Code Boundary Realignment). Option 2 (Alternate Preferred Last Line) received little community support and was deemed an insufficient response to the issue. Based on feasibility information provided by USPS, CDA staff recommended pursing Option 1. On September 21, 2023, the Alameda County Board of Supervisors approved a resolution authorizing the Community Development Agency to submit a request to the USPS to change mailing address PLLs (Place Names) for the unincorporated communities of Ashland, Castro Valley, Cherryland, Fairview, Hayward Acres, and San Lorenzo to align with the Planning Area names and boundaries of those communities (resolution included as **Attachment C**).

SUPPORTING DOCUMENTATION

Letters in support of the proposed PLL change are included as Attachment D.

USPS staff have advised the County that there is no formal process for pursuing PLL changes. In an effort to assist the USPS in performing a thorough review of the County's request, we also provide the following answers to the questions raised in the USPS ZIP Code boundary review process per Attachment A (USPS Management Instruction PO-439-2016-1, **Attachment E**):

- Does the requested boundary represent a formally established municipal boundary, or is it based on subjective perceptions?
 - The requested PLL boundaries represent established municipal boundaries, as outlined in the Alameda County General Plan. Ashland, Cherryland, Castro Valley, Fairview, and San Lorenzo are all Census Designated Places, with names that are recognized by the USGS Board on Geographic Names in its Geographic Names Information System (GNIS)¹. The community of Hayward Acres has been recognized in the Alameda County General Plan since at least 1963, but it does not have GNIS listing and is currently included in the San Lorenzo CDP. In parallel with this Place Name request to USPS, the County also pursuing separate Census designation and GNIS listing for Hayward Acres.
- Are the proposed boundaries cohesive and manageable, or will isolated pockets of deliveries be created? Will split sector-segments or block faces result?
 - Boundaries would remain cohesive and manageable because the proposed PLL change would not alter existing mail delivery routes.
- Will the requested boundaries create duplicate street addresses within a ZIP Code?
 - The proposed PLL change would not create duplicate street addresses within a ZIP Code, nor would it create duplicate street addresses between ZIP Codes that share a PLL.

¹ <u>https://edits.nationalmap.gov/apps/gaz-domestic/public/search/names</u>

- Can the requested boundary be accessed efficiently, or is access restricted by man-made or natural barriers?
 - The affected area will continue to be accessed efficiently and without any barriers because the proposed PLL change would not alter existing mail delivery routes.
- Will the affected deliveries be served from a different station or branch of the same Post Office, or by a different Post Office?
 - The proposed PLL change would not result in any changes to service or delivery because it would not alter existing mail delivery routes.
- Can the gaining facility physically accommodate the change? Are new or upgraded facilities planned within the affected area?
 - The proposed PLL change would not result in changes to the volume of mail processed by USPS facilities because it would not alter existing mail delivery routes.
- Will the potential transferred deliveries be served by the same form of delivery service in the gaining office (e.g., city, rural, or highway contract route delivery)?
 - No deliveries will be transferred to another office because the proposed PLL change would not alter existing mail delivery routes.
- Are there potential impacts to customer satisfaction, such as changes in parking availability, time of delivery to businesses, or locations and distances to travel for left-notice mail?
 - The proposed PLL change would not impact parking availability, time of delivery to business, or create other customer service-related issues because it would not alter existing mail delivery routes. Correcting the mismatch between USPS PLLs and official unincorporated Alameda County Planning Areas would help to alleviate longstanding community concerns related to community identity and visibility.
- If other municipalities will be affected, what is their position regarding the change?
 - The proposed PLL change would only impact addresses in unincorporated Alameda County; no other municipalities would be affected by this change.
- Will future annexation efforts generate ongoing request for change in the affected area? If so, approximately how many deliveries would be involved?
 - \circ $\:$ No official annexation efforts are currently underway in the affected area.

PHASED APPROACH TO IMPLEMENTATION

To minimize strain on USPS staff resources and to allow the County time to establish a GNIS listing for the community of Hayward Acres, the County proposes working with USPS to agree on a phased approach to implementation. For example, the County and USPS may agree to implement these changes one community at a time, or one ZIP Code at a time.

CONCLUSION

Since the ZIP Code system was devised in the 1960s, millions of Americans have been assigned mailing address Preferred Last Lines that do not align with municipal boundaries, impacting community identity, resident access to municipal resources, and other key aspects of civic and economic life². As a large, urban jurisdiction seeking remedies for this mismatch, Alameda County is well placed to serve as a case study for the USPS to help inform development of guidance for other jurisdictions seeking PLL changes.

² "Changing Postal ZIP Code Boundaries." CRS Report for Congress. June 23, 2006, <u>https://sgp.fas.org/crs/misc/RL33488.pdf</u>

There is limited disadvantage to the USPS from granting this request, but a tremendous potential benefit to the urban unincorporated communities of Alameda County, including:

- Improving unincorporated-community visibility and identity.
- Improving emergency response due to the impact of current PLL irregularities on emergency GPS databases.
- Decreasing mailings mistakenly sent by neighboring cities to unincorporated-area residents based on incorrect PLLs.
- Alleviating confusion about municipal boundaries.
- Additional ancillary benefits associated with providing accurate place names.

Thank you for your consideration of this request. The County looks forward to working with USPS to accomplish this long-awaited change on behalf of Alameda County's unincorporated communities.

Sincerely,

DocuSigned by:

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Sandra Rivera Director, Community Development Agency

CC:

Alameda County Board of Supervisors Congressman Eric Swalwell (CA-14) Juan González III, Mayor, City of San Leandro Mark Salinas, Mayor, City of Hayward Julie Stanley, USPS AMS Field Support, Julie.R.Stanley@usps.gov

Attachments

- A. List of Addresses for which Alameda County is requesting Preferred Last Line changes
- B. Map of Project Area
- C. Resolution
- D. Letters of Support
- E. USPS Management Instruction PO-439-2016-1

Attachment A

List of Addresses for which Alameda County is requesting Preferred Last Line changes

(sent to USPS separately as an Excel file)

Attachment B

Map of Project Area



Attachment C

Resolution – Alameda County Board of Supervisors

RESOLUTION NUMBER R-2023 - 669

A RESOLUTION AUTHORIZING THE COMMUNITY DEVELOPMENT AGENCY TO SUBMIT A REQUEST TO THE UNITED STATES POSTAL SERVICE TO CHANGE MAILING ADDRESS PLACE NAMES FOR UNINCORPORATED ASHLAND, CASTRO VALLEY, CHERRYLAND, FAIRVIEW, HAYWARD ACRES, AND SAN LORENZO TO ALIGN WITH PLANNING AREA NAMES AND BOUNDARIES, AS DEFINED IN THE ALAMEDA COUNTY GENERAL PLAN

WHEREAS, a "Place Name" (also known as a "Preferred Last Line") is the mailing address "city" name that the United States Postal Service (USPS) assigns by default to addresses in a ZIP Code based on the location of the USPS branch that delivers mail to that ZIP Code; and

WHEREAS, "Planning Areas" are the official names and boundaries of the unincorporated communities of Alameda County, as defined in the Alameda County General Plan; and

WHEREAS, Place Names assigned by the USPS do not accurately reflect Planning Area community names or boundaries in the unincorporated Alameda County communities of Ashland, Castro Valley, Cherryland, Fairview, Hayward Acres, and San Lorenzo; and

WHEREAS, Ashland addresses have USPS Place Names of Hayward (94541), San Leandro (94578, or San Lorenzo (94580); and

WHEREAS, Castro Valley addresses have USPS Place Names of Castro Valley (94546, 94552), Hayward (94542), or San Leandro (94578); and

WHEREAS, Cherryland addresses have USPS Place Names of Hayward (94541) or San Lorenzo (94580); and

WHEREAS, Fairview addresses have USPS Place Names of Castro Valley (94552) or Hayward (94541, 94542); and

WHEREAS, Hayward Acres addresses have a USPS Place Name of Hayward (94541); and

WHEREAS, San Lorenzo addresses have USPS Place Names of San Lorenzo (94580) or Hayward (94541); and

WHEREAS, the mismatch between USPS Place Names and Planning Area names causes confusion and negatively impacts unincorporated community identity by confusing residents about where they live, where they can access government and emergency services, and which local elected officials represent them; and

WHEREAS, approximately 27,365 parcels (or approximately 75,000 addresses) in the urban unincorporated communities are impacted by mismatched USPS Place Names; and

WHEREAS, the issue of mismatched unincorporated Place Names and Planning Areas and misaligned ZIP Codes arose as a key concern of the Eden Area Livability Initiative (EALI), a group launched by Supervisor Nate Miley to improve the quality of life and health of the residents of the Eden Area; and

WHEREAS, the EALI Phase II Governance Working Group began researching ZIP Code realignment options and processes in 2019; and

WHEREAS, in March of 2022, Supervisor Nate Miley requested the Community Development Agency's assistance with completing the project; and

WHEREAS, Community Development Agency staff learned from the USPS that the County could request one of three options from the USPS: Option 1, a Place Name (Preferred Last Line) Change; Option 2: an Alternative Preferred Last Line Change; and Option 3: a ZIP Code Boundary Realignment; and

WHEREAS, in Option 1: Place Name (Preferred Last Line) Change, the unincorporated community Planning Area names of Ashland, Castro Valley, Cherryland, Fairview, Hayward Acres, and San Lorenzo would become the default USPS Place Names for each community; and

WHEREAS, in Option 2: Alternate Preferred Last Line Change, the USPS would recognize the unincorporated community Planning Area names as optional alternatives to existing USPS Place Names; and

WHEREAS, in Option 3: ZIP Code Boundary Realignment, an option that the USPS has indicated it is unlikely to approve, the County could request to align ZIP Code boundaries and Place Names with unincorporated Planning Areas; and

WHEREAS, on December 7, 2022, Community Development Agency staff presented the three options as an informational item to the Board of Supervisors' Unincorporated Services Committee, and the Committee indicated initial support for Option 1: Place Name Change, directing Staff to gather information about estimated costs and present the options to the community for comment; and

WHEREAS, on January 25, 2023, Community Development Agency staff presented the three options as an informational item to the Castro Valley Eden Area Chamber of Commerce, which expressed general support for Option 1; and

WHEREAS, on February 21, 2023, Community Development Agency staff presented the three options as an informational item to the Castro Valley Municipal Advisory Council, which expressed general support for Option 1 or Option 2; and

WHEREAS, on March 7, 2023, Community Development Agency staff presented the three options as an informational item to the Fairview Municipal Advisory Council, which expressed general support for Option 1 or Option 2; and

WHEREAS, on April 11, 2023, Community Development Agency staff presented the three options as an informational item to the Eden Area Municipal Advisory Council, which

expressed general support general support for pursuing Option 1 immediately while making preparations to pursue Option 3 in the near future; and

WHEREAS, Community Development Agency staff released a communitywide electronic survey from March to July, 2023, receiving 136 responses, 65 percent of which indicated Option 1 (Place Name Change) as their first choice; and

WHEREAS, on August 10, 2023, Community Development Agency staff presented the results of these community engagement efforts as an action item to the Board of Supervisors' Transportation and Planning Committee with a recommendation the County pursue Option 1 (Place Name Change) in the short term and consider pursuing Option 3 (ZIP Code Boundary Realignment) after there is time to assess the implementation of Option 1; and

WHEREAS, Board of Supervisors' Transportation and Planning Committee voted unanimously in favor of pursuing Option 1 (Place Name Change) and directed staff to schedule a hearing before the Board of Supervisors for approval; and

WHEREAS, the Board of Supervisors did hold a public hearing at 10:00 am on Thursday, September 21, 2023 in the Board of Supervisors' Chambers, Fifth Floor, 1221 Oak Street, Oakland, California, to consider the proposal and any objections thereto; and

WHEREAS, the Board of Supervisors did hear and consider all reports, recommendations, and testimony presented; and

NOW, THEREFORE, BE IT RESOLVED that the Board of Supervisors does hereby authorize the Community Development Agency to submit a request to the United States Postal Service to change mailing address Place Names for unincorporated Ashland, Castro Valley, Cherryland, Fairview, Hayward Acres, and San Lorenzo to align with Planning Area names and boundaries, as defined in the Alameda County General Plan. **THE FOREGOING** was **PASSED** and **ADOPTED** by a majority vote of the Board of Supervisors of the County of Alameda this 21st day of September, 2023 by the following vote:

AYES: Supervisors Márquez, Tam, Haubert and President Miley - 4

NOES: None

EXCUSED: Supervisor Carson - 1

ABSTAIN: None

Mile

Nate Miley, President Board of Supervisors

ATTEST: Clerk of the Board of Supervisors

atus By: eputv

APPROVED AS TO FORM: Donna R. Ziegler, County Counsel

DocuSigned by: Caitlyn M. Gulyas By:

Caitlyn Gulyas Deputy County Counsel

Attachment D

Letters of Support

ERIC SWALWELL 14th District, California

20990 Redwood Road Castro Valley, CA 94546 (510) 370-3322

174 CANNON HOUSE OFFICE BUILDING WASHINGTON, DC 20515 (202) 225-5065

SWALWELL.HOUSE.GOV

Congress of the United States Bouse of Representatives

Washington, DC 20515

RANKING MEMBER, SUBCOMMITTEE ON RESPONSIVENESS AND ACCOUNTABILITY TO OVERSIGHT

> SUBCOMMITTEE ON ADMINISTRATIVE STATE, REGULATORY REFORM, AND ANTITRUST

SUBCOMMITTEE ON IMMIGRATION INTEGRITY, SECURITY AND ENFORCEMENT

COMMITTEE ON HOMELAND SECURITY RANKING MEMBER, SUBCOMMITTEE ON CYBERSECURITY AND INFRASTRUCTURE PROTECTION

August 14, 2024

Dorothy E. Navarro, Mgr. Address Management Systems United States Postal Service, California 2 District 3775 Industrial Blvd., Room 2071, West Sacramento, CA 95799-0043

Dear Ms. Navarro,

I write to bring to your attention a matter of significant importance to the constituents of Alameda County, California, regarding the alignment of USPS mailing address Place Names with the official names and boundaries of the county's unincorporated communities. This initiative, known as the Alameda County USPS Project, seeks to rectify longstanding discrepancies that have adversely affected community identity, public health data collection, and residents' access to essential public services.

At its September 21, 2023, hearing, the Alameda County Board of Supervisors, through Resolution R-2023-669, authorized a formal request to the USPS to change mailing address Place Names for unincorporated communities such as Ashland, Castro Valley, Cherryland, Fairview, Hayward Acres, and San Lorenzo. The current Place Names do not accurately reflect the official community boundaries as defined in the Alameda County General Plan, leading to confusion among residents and service providers.

The County has identified approximately 30,200 addresses in urban unincorporated areas where USPS Place Names are mismatched. For instance, residents of Cherryland or Hayward Acres may receive mail addressed to "Hayward," which does not accurately represent their community identity. This discrepancy not only impacts everyday life but also complicates public health data collection and hinders residents' ability to access essential services.

Alameda County has actively engaged with USPS since March 2022 on this issue, initially proposing changes for approximately 27,365 addresses. Despite community outreach efforts and overwhelming support for a Place Name change as the most viable solution, recent communications with USPS have suggested reluctance due to operational constraints. While USPS indicated the possibility of an Alternate Preferred Last Line option, this would not fully address the underlying community identity issues highlighted by Alameda County.

Therefore, I strongly urge the USPS to reconsider Alameda County's request for a Preferred Last Line (Place Name) change. This administrative adjustment is crucial in ensuring that mailing addresses accurately reflect the official community names and boundaries, aligning with best practices observed in successful initiatives across other jurisdictions nationwide.

20990 Redwood Road Castro Valley, CA 94546 (510) 370-3322

174 CANNON HOUSE OFFICE BUILDING WASHINGTON, DC 20515 (202) 225-5065

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Congress of the United States House of Representatives

Washington, DC 20515

RANKING MEMBER, SUBCOMMITTEE ON RESPONSIVENESS AND ACCOUNTABILITY TO OVERSIGHT

SUBCOMMITTEE ON ADMINISTRATIVE STATE, REGULATORY REFORM, AND ANTITRUST

SUBCOMMITTEE ON IMMIGRATION INTEGRITY, SECURITY AND ENFORCEMENT

COMMITTEE ON HOMELAND SECURITY RANKING MEMBER, SUBCOMMITTEE ON CYBERSECURITY AND INFRASTRUCTURE PROTECTION

I appreciate your attention to this matter and request you give Alameda County's request full and fair consideration in accordance with all applicable laws, rules, and regulations.

Thank you for your continued service to our communities.

Sincerely,

Eric Swalwell Member of Congress

Ene Swelinde



Alameda County Fire Department

6363 Clark Avenue --- Dublin, CA-94568 Tel (925) 833-3473 --- (510) 632-3473 --- Fax (925) 875-9387 www.acgov.org/fire

WILLIAM L. McDONALD Fire Chief April 29, 2024

SERVING:

City of Dublin

City of Emeryville

City of Newark

City of San Leandro

City of Union City

Lawrence Berkeley National Laboratory

Lawrence Livermore National Laboratory

Unincorporated Areas of Alameda County

Alameda County Regional Emergency Communications Center "Accredited Center of Excellence" Dear USPS District Manager,

I am writing to express my full support of Alameda County's efforts to work with the United States Postal Service (USPS) to modify USPS Place Names (also called "Preferred Last Lines") to match the official community names and boundaries of unincorporated Ashland, Cherryland, Hayward Acres, San Lorenzo, Castro Valley, and Fairview. As Fire Chief for the Alameda County Fire Department (ACFD), I recognize the immense value that this project holds for the communities the ACFD serves.

The ACFD provides all-risk emergency services to the unincorporated areas of Alameda County that are covered in this project. The services we provide include: Advanced Life Support; Fire Suppression; Hazardous Materials Response; Urban Search & Rescue; Water Rescue; Community Outreach & Education; Disaster Preparedness; Fire Prevention and Code Compliance; and Regional Dispatch.

Address data is foundational to the ACFD's work, and accurate situs addresses allow the ACFD to rapidly respond to emergencies throughout our service area. The Place Names and ZIP Codes in the County's unincorporated communities do not conform to formally established municipal boundaries, causing confusion for both community members and emergency responders when communicating the location of an incident.

Fulfilling the County's request will affirm the existence and dignity of the unincorporated-area communities while improving the ACFD's ability to provide rapid and responsive emergency services.

The Alameda County Fire Department stands in full support of the County's efforts to accurately register Place Names for the Unincorporated Area communities and urges USPS to approve and implement the County's request.

Sincerely,

Delino I. W

William McDonald Fire Chief, Alameda County Fire Department



YESENIA SANCHEZ SHERIFF-CORONER

510-272-6866

May 10, 2024

Nate Miley, Supervisor, District 4 Attn: USPS Project Support Letter 20980 Redwood Road, Suite 250 Castro Valley, CA 94548

Dear United States Postal Services:

Subject: Request to Change USPS Place Names in Unincorporated Alameda County

The Alameda County Sheriff's Office (ACSO) is pleased to submit this letter in support of Alameda County's efforts to work with the United States Postal Service (USPS) to modify USPS Place Names (also called "Preferred last Line") to match the official community names and boundaries of unincorporated Ashland, Cherryland, Hayward Acres, San Lorenzo, Castro Valley, and Fairview.

ACSO is a public safety organization that provides law enforcement services to the citizens in the unincorporated Alameda County communities of Ashland, Cherryland, Hayward Acres, San Lorenzo, Castro Valley, Fairview, and more. Every day in our work, we see citizens confused about where to access public services such as filing police reports. Many times, citizens try to file police reports with Hayward Police or San Leandro Police for crimes that occurred in Ashland, Cherryland, or Fairview only to be turned away and told to report with ACSO. Citizens living in Ashland share a ZIP with San Lorenzo. One citizen complained, "I barely knew where Ashland was until recently, and my family has been here since 1950." Many citizens lament that despite their unique community identity, they lack official or widespread recognition. The citizens of Ashland, Cherryland, Hayward Acres, San Lorenzo, Castro Valley, and Fairview matter and want to be acknowledged.

Having USPS Place Names that match our unincorporated community names will help forge a stronger relationship between our organization and the community by eliminating any confusion on who we are and validating our unique identity. Changing USPS Place Names will provide greater ownership and name recognition for our organization and the community. ACSO strongly urges you to support this long-overdue change.

Sincerely,

Yesenia L. Sanchez Sheriff-Coroner

YLS:GSG:mb



April 29, 2024

Dear United States Postal Service,

On behalf of Alameda County Health (AC Health), we are writing in full support of Alameda County's (California) USPS Place Name Change application to correctly register unincorporated area "Place Names" to align with the official names and boundaries of the communities of Ashland, Cherryland, Hayward Acres, Fairview, San Lorenzo, and Castro Valley. AC Health is the county's health jurisdiction and is comprised of the departments of Behavioral Health, Environmental Health, and Public Health, along with the Emergency Medical Services Agency, Housing and Homelessness Services, Healthy Schools and Communities and other major programs. For more than 80 years, AC Health has worked to improve the health and safety of county residents and the neighborhoods in which they live, work, and play.

When USPS Place Names and associated ZIP codes do not match the official community names, it can have a negative impact on community identity, public health data collection, and on our residents' ability to access essential public services in unincorporated Alameda County. AC Health depends on understanding the localized needs of our communities to deliver effective, appropriate, and targeted services. While we relied heavily on zip code data to tailor our COVID-19 pandemic response, not having place names accurately match zip codes made it difficult to precisely measure our impact in specific communities. Accurate data is an essential component of public health, and it provides us the insight into the health and wellness of our residents while allowing us to track population health status.

Thank you for your consideration.

Sincerely,

Colleen Chawla Agency Director Alameda County Health

Colleen Chawla Director

1000 San Leandro Boulevard Suite 300 San Leandro, CA 94577

TEL (510) 618-3452 FAX (510) 351-1367

Health.AlamedaCountyCA.gov



ORO LOMA SANITARY DISTRICT

BOARD OF DIRECTORS Fred Simon, President Shelia Young, Vice-President Benny Lee, Secretary Rita Duncan, Director Paul Stelzmann, Director

> GENERAL MANAGER Jimmy Dang

April 23, 2024

Nate Miley Supervisor, District 4 20980 Redwood Road, Suite 250 Castro Valley, CA 94546

SUBJECT: SUPPORT CHANGE USPS PLACE NAMES

Dear United States Postal Services:

Oro Loma Sanitary District is submitting this letter in support of Alameda County's efforts to work with the United States Postal Service (USPS) to modify USPS Place Names (also called "Preferred Last Lines") to match the official community names and boundaries of unincorporated Ashland, Cherryland, Hayward Acres, San Lorenzo, Castro Valley, and Fairview. Oro Loma is a public agency that provides wastewater and solid waste services in the unincorporated Alameda County to the above-mentioned communities.

We see and deal with the confusion that the incorrect place names cause. Residents of these communities are often provided with the wrong program information because their zip is connected to the neighboring city. This is problematic for two reasons:

- 1. These areas do not belong to the City of Hayward or City of San Leandro. However, they often receive City information due to their shared USPS Place Name.
- 2. Municipal Solid Waste Agreements vary in rates, programs, and services. Therefore, the community "USPS Place Names" should be unique to each community.

By changing the "Place Names," USPS would be helping the communities they too serve and ensuring they are provided information and resources available to them. Oro Loma strongly urges you to support this long overdue change.

Sincerely,

Jimmy Dang General Manager

Oro Loma Sanitary District

City of San Leandro Civic Center, 835 E. 14th Street San Leandro, California 94577 www.sanleandro.org



April 25, 2024

United State Postal Service 475 L'Enfant Plaza SW, Washington, DC, 20260-3100.

Dear United States Postal Service:

As the Mayor of San Leandro, I support the County of Alameda's efforts to collaborate with the United States Postal Service (USPS) to modify USPS Place Names (also called "Preferred Last Lines") to match the official community names and boundaries of unincorporated Ashland, Cherryland, Hayward Acres, San Lorenzo, Castro Valley, and Fairview.

Thousands of businesses and residents in unincorporated Alameda County presently have USPS Place Names that don't match their official community names. For example, there are many residents who live in the unincorporated communities cited above whose Place Names and mailing addresses are currently designated as "San Leandro, California", when in fact they live outside of the municipal boundaries of the City of San Leandro. As a result, many people incorrectly believe themselves to be residents of our City, when their local government services are actually provided by the County of Alameda, as governed by the Alameda County Board of Supervisors.

Having USPS Place Names that match the locally identified unincorporated community names would foster greater clarity and accountability for local governments throughout the region and reduce confusion to the public. For these reasons, I am pleased to support this long-overdue change.

Thank you for your consideration of this input.

Sincerely,

Juan González III Mayor, City of San Leandro A City where Kindness Matters and Innovation Flourishes



UCCE Alameda County Department of Agriculture Offices 224 West Winton Ave, Suite #134 Hayward, CA 9454 cealameda.ucanr.edu

May 24, 2024

RE: Letter of Support for USPS Place Names

Dear United States Postal Services,

I am submitting this letter as a resident of Alameda County, and a professional in a relevant field, to formally support of Alameda County's efforts to work with the United States Postal Service (USPS) to modify USPS Place Names (also called "Preferred Last Lines") to match the official community names and boundaries of unincorporated Ashland, Cherryland, Hayward Acres, San Lorenzo, Castro Valley, and Fairview. As an individual with expertise in the area of community development and environmental justice (I hold Masters Degrees from the University of California in both Community Development and Geography), and the current Black, Indigenous and People of Color (BIPOC) Advisor serving the San Francisco / Bay Area through the University of California Cooperative Extension (UCCE)¹ I engage in these communities in my work. My work pertains especially to BIPOC communities in unincorporated Alameda County, the same communities affected by this proposal, in my work I have noted that:

• Alameda Counties unincorporated communities have a high representation of BIPOC communities and low-income households; both are disproportionately vulnerable populations to negative economic, environmental and health impacts (CalEnvironScreen / US census tract data).

• Lack of alignment of USPS (mail address) and place names creates a less cohesive sense of community identity which can be detrimental to civic engagement and social cohesion; this can also create barriers to accessing services in an unincorporated area that has less basic infrastructure and governance support, when compared to cities.

• This lack of alignment in names and mailing addresses can add confusion in communities that already experience high levels of linguistic isolation- as is the case of many of the census tracts that are identified in this proposal (CalEnviroScreen, census tract data).

It is my professional opinion that aligning place names is key to the establishment and long-term success of programs that serve BIPOC communities; furthermore, I believe this proposed action will 1) aid in the maintenance of social and economically beneficial infrastructure and services (such as that provided by USPS), and 2) also potentially boost civic engagement. The proposed USPS Place Names effort will aid in improving upon and maintaining critical infrastructure that affects BIPOC communities in unincorporated areas of Alameda County. I strongly urge you to support this long overdue change.

Sincerely,

Cristina Murillo Barrick Alameda County Resident UCCE BIPOC Community Development Advisor, serving the Bay Area

¹ Please note the views expressed in this letter are my own and do not necessarily represent the official opinion of the University of California.



April 30, 2024

Dear United States Postal Services:

On behalf of First 5 Alameda County (First 5), I am pleased to submit this letter in **support of the County** of Alameda's efforts to work with the United States Postal Service (USPS) to modify USPS Place Names (also called "Preferred Last Lines") to match the official community names and boundaries of its unincorporated communities: Ashland, Cherryland, Hayward Acres, San Lorenzo, Castro Valley, and Fairview.

First 5 was established in 1998 by California's Proposition 10. Our role is to improve life outcomes for Alameda County's youngest children. We are guided by a "whole community, whole family, whole child" policy and programming approach to our work. We partner with community-based organizations to ensure that families and providers have the resources they need for children to thrive—including basic needs, connections to services and information, and peer support to promote mental health and well-being. We invest in place-based strategies through our <u>Neighborhoods Ready for School</u> grants to promote neighborhood conditions where families can thrive.

First 5 uses lessons learned from our investments, research and data, and partnerships to inform policy positions and influence local, state, and national decision-making. We utilize geographic data to target investments towards communities with the greatest need. However, **data for the unincorporated areas** of the county are often only available at the zip code level. While this method gives us a broad understanding of areas with greater need, it requires broad assumptions and poses challenges in identifying the unique needs and specifying investments for individual and distinct unincorporated communities in our county.

Modifying USPS Place Names to match official community names and boundaries of unincorporated Ashland, Cherryland, Hayward Acres, San Lorenzo, Castro Valley, and Fairview would support local agencies, systems, and community organizations with the data to target investments in communities with most need. These communities have been historically underserved and underfunded, affected by structural racism, and resulting economic and health inequities. To promote equitable investments and delivery of programs, First 5 strongly supports the long overdue change of having USPS Place Names that match our unincorporated community names and boundaries.

Sincerely,

Knishin spanos

Kristin Spanos Chief Executive Officer First 5 Alameda County



P: (510) 227-6900 F: (510) 227-6901





April 30, 2024

Dear United States Postal Services:

Community Child Care Council (4Cs) of Alameda County is pleased to submit this letter in support of Alameda County's efforts to work with the United States Postal Service (USPS) to modify USPS Place Names (also called "Preferred Last Lines") to match the official community names and boundaries of unincorporated Ashland, Cherryland, Hayward Acres, San Lorenzo, Castro Valley, and Fairview.

4Cs is a non-profit family resource agency dedicated to strengthening children, families and child care providers in Alameda County since 1972. We provide access to affordable, quality child care by connecting families and providers to a wide network of community partners, child focused resources and financial assistance programs. We also provide family navigation, basic needs resources like diapers, formula and food in the unincorporated Alameda County communities of Ashland, Cherryland, Hayward Acres, San Lorenzo, Castro Valley, and Fairview.

Every day in our work, we see the residents of unincorporated Alameda County frustrated with the negative consequences of living in an area that has incorrect place names, such as confusion as to what resources are available to them and what communities they belong to. We also see confusion on the government level as to how to gather accurate data about the communities which typically determines where government funding is allocated. Having USPS Place Names that match our unincorporated community names would provide clarity to residents and government entities that would ensure better supported and informed communities. 4Cs of Alameda County strongly urges you to support this long overdue change.

Sincerely,

Rence S. Hengeld

Renee Herzfeld Chief Executive Officer (CEO)

Abbors, Alison, CDA

From:	Todd Anglin <todd.anglin.debk@statefarm.com></todd.anglin.debk@statefarm.com>
Sent:	Monday, April 8, 2024 10:12 AM
То:	PlaceNamesNow
Cc:	Gary Slate; Todd Anglin
Subject:	CVEA Chamber of Commerce support for USPS Place Names Modification

Dear United States Postal Service:

The Castro Valley / Eden Area Chamber of Commerce has 2 offices in the unincorporated Alameda County community and represents nearly 350 business members across our county. We support Alameda County's efforts to work with the United States Postal Service (USPS) to modify USPS Place Names (also called "Preferred Last Lines") to match the official community names and boundaries of unincorporated Ashland, Cherryland, Hayward Acres, San Lorenzo, Castro Valley, and Fairview.

We have heard the strong desire by many of our business members and residents where thousands of businesses and residents in unincorporated Alameda County have USPS Place Names that don't match official community names. For example, my USPS Place Name where I live is "Hayward", even though I live in the unincorporated community of Fairview. This causes a lot of confusion for people often thinking they need to go to Hayward City Hall for contractor permits for work, fire department info (Fairview has its own Fairview Fire Prevention District), emergency service calls, code/zoning compliance, and a host of other issues we experience all the time due to the confusion.

Having USPS Place Names that match our unincorporated community names would clear up a lot of confusion, while also giving people a strong community identity where they actually live. I strongly urge you to support this long overdue change.

Sincerely,

Todd Anglin,

Board Chair of the Castro Valley Eden Area Chamber of Commerce



Todd Anglin, Board Chair 2024 Castro Valley/Eden Area Chamber of Commerce Office: (510) 537-5300 Per. Cell: (510) 866-6829 Info@castrovalleychamber.com www.edenareachamber.com

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April 17, 2024

Dear United States Postal Services,

I am writing to you on behalf of Eden United Church of Christ, a service provider operating in the unincorporated areas of Alameda County, specifically within the Eden Area. We have been serving the residents of our community for 159 years. In the past 13 years, in particular, we have been providing food security services, newcomer navigation, community empowerment & resiliency services, and most recently financial empowerment programs. Our commitment to enhancing the lives of our community members has brought us face-to-face with numerous challenges of our members and neighbors--one of which pertains to the misalignment of USPS place names and the actual geographic identities of our service areas.

The ongoing issue with incorrect USPS place names has significantly impacted the communities we serve. Residents often face confusion over their actual municipal affiliations, which complicates their ability to access public services, receive timely emergency response, and participate fully in county and state programs that are designated for their actual living areas.

We understand that the Alameda County Board of Supervisors, in collaboration with the USPS, is considering a formal request to correct these place names to reflect the true identities of these communities. We wholeheartedly support this initiative as it would provide immediate benefits in terms of enhancing community identity, improving the accuracy of public health data, and ensuring more efficient delivery of services.

Aligning ZIP codes with true community names will empower residents and enable service providers like us to better target and tailor our efforts to the specific needs of each community. We appreciate the efforts of the Community Development Agency and the Board of Supervisors in recognizing and addressing this long-standing issue.

We look forward to the positive outcomes of this change and are eager to assist with the facilitation of this transition. Thank you for considering this crucial improvement that promises to enhance the quality of life and service accuracy for the residents of unincorporated Alameda County.

Sincerely,

The Rev. Dr. Arlene K. Nehring Senior Minister & Executive Director Eden United Church of Christ



May 9, 2024

Dear United States Postal Services,

Resources for Community Development (RCD) is pleased to submit this letter in support of Alameda County's efforts to work with the United States Postal Service (USPS) in modifying USPS Place Names (also known as "Preferred Last Lines") to align with the official community names and boundaries of unincorporated Ashland, Cherryland, Hayward Acres, San Lorenzo, Castro Valley, and Fairview.

For over 37 years, RCD's model has focused on service-enriched affordable housing. Our experience in serving individuals with diverse and often co-occurring special needs has deepened our understanding of building inclusive communities that welcome everyone. RCD's investment in unincorporated communities has led to advancements in policies and programs to meet basic needs, aid in pandemic recovery efforts, improve infrastructure and promote economic development initiatives.

Each day, we encounter the frustrations of residents in unincorporated Alameda County grappling with the fallout of inaccurate place names. This confusion creates uncertainty regarding available resources and community affiliations for residents and government agencies tasked with allocating funds and collecting data. Rectifying these discrepancies by aligning USPS Place Names with our community names is crucial for providing clarity and support to residents and government entities. This issue drastically impacts the communities we serve, hindering access to public services, emergency response, and participation in designated programs.

We fully endorse this initiative, recognizing its potential to enhance community identity, streamline service delivery, and improve public health data accuracy. By aligning ZIP codes with accurate community names, residents and service providers alike will be better equipped to address each area's unique needs.

Thank you for considering this crucial improvement, which promises to enhance clarity for residents and service accuracy in unincorporated Alameda County. Matching USPS Place Names with our community names would effectively remove obstacles to care and broaden service accessibility for our community members. Therefore, RCD strongly urges you to support this long-overdue change.

Sincerely,

Dan Sawislak Executive Director Resources for Community Development

 Resources for Community Development 2220 Oxford Street • Berkeley, CA 94704 (510) 841-4410 • FAX (510) 548-3502
 WWW.RCDHOUSING.ORG



April 8, 2024

Dear United States Postal Services:

Tiburcio Vasquez Health Center, Inc. (TVHC) is pleased to submit this letter of support of Alameda County's efforts to work with the United States Postal Service (USPS) to modify USPS Place Names (also called "Preferred Last Lines") to match the official community names and boundaries of unincorporated Ashland, Cherryland, Hayward Acres, San Lorenzo, Castro Valley, and Fairview in Southern Alameda County, California.

TVHC is a Federally Qualified Health Center (FQHC) that operates 11 primary care clinics throughout Southern and Central Alameda County and provides primary care, dental, behavioral health care, youth health services, health education and outreach, and other supportive services to low-income, limited English proficient, uninsured, and publicly insured patients. Many the patients we serve reside in the unincorporated Alameda County communities of Ashland/Cherryland, San Lorenzo, Castro Valley, Fairview, and Hayward Acres.

As an organization focused on increasing access to health care for the most vulnerable people in our communities, TVHC is aware of how critically important it is to have correct place names in our service area. When place names are not correct, it is harder for prospective patients to find our services or to even know we are in their immediate area. This creates an additional barrier to care for people who already face many challenges, and it also makes it harder for us to gather the most accurate data about the people in our service area.

Having USPS Place Names that match our unincorporated community names would help to eliminate this barrier to care and increase access for our community members. Because of this, TVHC strongly urges you to support this long overdue change.

Sincerely,

DocuSigned by: Andres Schweb-Gelinda

Andrea Schwab-Galindo, MPH **Chief Executive Officer**



Cherryland Community Association P.O. Box 292 San Lorenzo, CA 94580

May 2024

To the Attention of the United States Postal Service:

The Cherryland Community Association is pleased to submit this letter in support of Alameda County's efforts to work with the United States Postal Service (USPS) to modify USPS Place Names (also called "Preferred Last Lines") to match the official community names and boundaries of unincorporated Ashland, Cherryland, Hayward Acres, San Lorenzo, Castro Valley, and Fairview.

Cherryland Community Association is a volunteer community-based organization advocating and working for the betterment of our neighborhood to ensure equity and inclusion of our rich and culturally diverse population, and to improve the health, safety, and quality of life in our underserved community in the unincorporated Eden Township of Cherryland in Alameda County.

Businesses and residents throughout unincorporated Alameda County have USPS Place Names that don't match official community names. For example, the unincorporated community of Cherryland has the USPS Place Name of 'Hayward' with both communities sharing the same zip code of 94541. The following are some consequences experienced by Cherryland residents due to the use of incorrect Place Names:

- Many residents, including long-term residents, are not aware of where they actually reside,
- Uncertainty about who their government representatives are leads to confusion.
- Confusion exists in navigating which entity delivers public services, including safety, health, environmental, zoning enforcement, and economic and civic development.
- Ensure transparent and accurate appropriation of tax revenues to administer better services to the underserved unincorporated community of Cherryland.

Having USPS Place Names that match our unincorporated community names would provide community identity. The Cherryland Community Association strongly urges you to support this long-overdue change.

Sincerely,

Cherryland Community Association Cindy Torres, President Michael Freed, Vice-President/Treasurer Letters of support from residents were sent to USPS, but have been excluded from this packet to protect personal information provided by residents

Attachment E

USPS Management Instruction PO-439-2016-1



Management Instruction

ZIP Code Boundary Review Process

This management instruction establishes policy and procedures for ZIP Code[™] boundary reviews.

Development

This ZIP Code Boundary Review Process document was developed by Headquarters Delivery Operations.

Objectives

The ZIP Code Boundary Review Process was developed to provide guidance when responding to proponent requests for a ZIP Code boundary change or realignment. It includes instruction on those elements common to all ZIP Code boundary reviews and documentation required as part of the review process. Items such as maps of the impacted area, addresses impacted by the proposed boundary realignment, and associated costs of the request. In addition, instruction is provided on conducting boundary review customer surveys.

Scope

All Postal Service[™] managers should become familiar with this instruction in order to provide responses to ZIP Code boundary review requests received from proponents within their respective area of oversight. Responses and documentation must be consistent with the policies established in this Management Instruction.

Policy

The ZIP Code system is designed to provide an efficient postal distribution and delivery network. ZIP Code assignments are, therefore, closely linked to factors such as mail volume, delivery area size, geographic location, and topography, but not necessarily to municipal or perceived community boundaries. The general stability of ZIP Code boundaries is essential to prompt and accurate distribution of mail. However, delivery growth and changing demographics can necessitate adjustments to ZIP Code boundaries in order to achieve Postal Service objectives.

While the Postal Service must be guided by concerns for service and efficiency, it does appreciate the identity and addressing concerns of

DateMarch 1, 2016EffectiveMarch 1, 2016NumberPO-439-2016-1ObsoletesN/AUnitDelivery Operations

Edward F. Phelan, Jr. Vice President, Delivery Operations

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local communities. Therefore, municipal requests to modify authorized last lines of address and/or ZIP Code boundaries in order to provide municipal identity, especially in undeveloped areas, will be reasonably considered.

A community group may also request an adjustment to a ZIP Code boundary as outlined in this policy. The requested boundary should be consistent with the actual municipal boundary and identity of the affected area. Documented endorsement of the request by the local government is strongly recommended. This will help to ensure that the non-postal interests of all customers are represented fairly and are in concert with long-term municipal planning.

Requests to amend postal ZIP Code boundaries must receive careful, thorough, and balanced evaluations. The unique situations pertinent to each ZIP Code boundary must be considered. Administrative solutions that do not adversely affect postal operations should be pursued to the extent reasonably practicable. Realignment of a ZIP Code boundary should be considered only where there are no viable administrative solutions and no unreasonable impacts to postal operations.

Roles and Responsibilities

Proponents (Municipalities and Community Groups)

Submit the specific change(s) desired, with any rationale and justification, in writing to the District Manager who would be responsible for the affected territory if the change were approved. If the request is later denied, the decision may be appealed, unless denial was based on a negative customer response to a survey conducted in accordance with this process. The basis of consideration of an appeal will be limited to whether or not reasonable accommodation was made by local postal managers.

Appeals must be made within **forty-five (45) days** of the issuance of the District Manager's final decision and submitted to:

MANAGER, RURAL DELIVERY U.S. POSTAL SERVICE 475 L'ENFANT PLAZA SW RM 7416 WASHINGTON, DC 20260-7340

Local Postmasters

If requests are received locally, forward them to the district for appropriate consideration. Provide background and operational information pertinent to the evaluation of the request.

District Managers

Operations Programs Support will normally process all requests concerning addressing and ZIP Code boundaries. On receipt of a request, notify affected Postmasters, obtain background material, and:

- Identify all issues (see Attachment A);
- Identify potential administrative solutions (see Attachment B);

- Determine specific impacts and the operational feasibility of the request;
- Quantify impacts (use Attachment C);
- Provide detailed supporting documentation;
- Review findings with the affected Postmasters;
- Meet with the proponent, either in person or via teleconference, to discuss the issues, impacts, and potential alternatives. If partial accommodation is feasible, the proponent may wish to amend the request; and
- Prepare a recommendation.

A final determination should be provided within **sixty (60) days** of receipt of the request. However, depending on the magnitude of potential changes and/or the number of pending requests, some extension or prioritization may be necessary. If a determination is not expected within 60 days, notify the proponent of the estimated completion date.

The District Manager will make a decision to authorize alternative solutions, and/or to grant or deny any realignment. If the proposal is denied, the District Manager must advise the proponent <u>in writing</u>, giving the specific reasons for denial. The response must be based on the results of the analysis and must advise the proponent of the appeal process.

If accommodation is being considered, advise the affected Postmaster(s) and arrange a joint meeting with the proponent, either in person or via teleconference, to discuss the proposed accommodation. If agreement is reached, proceed with the customer survey element of the process.

Vice Presidents, Area Operations

The Vice President, Area Operations, must do the following:

- Review all cases that are appealed;
- Validate the data used to support the decision;
- Ensure that a thorough and reasonable evaluation was conducted; and
- Provide a written decision to the Headquarters Manager, Rural Delivery.

Headquarters

The Manager, Rural Delivery, administers the ZIP Code Boundary Review Process.

A proponent whose request has been denied as a result of this process may appeal that decision to the Manager, Rural Delivery, <u>except</u> where a potential accommodation was agreed to, but was not implemented due to a negative customer survey response.

On receipt of an appeal, Headquarters will obtain the case file from the district. The basis of consideration will be limited to whether or not reasonable accommodation was provided. Generally, a decision will be provided within 60 days.

Customer Support and Surveys

Reviews should be conducted with the assumption that the proponent is fairly and accurately representing customer preferences. If previous surveys or feedback contradict this, they can be noted, but they are not a suitable basis for denial of a request.

The Postal Service will not conduct surveys before a potential accommodation is identified and agreed upon. This prevents inappropriate concern or speculation about a change that might not be feasible.

If a potential accommodation is agreed upon, customer support is then confirmed via a survey. Prior to the actual survey, some municipalities may opt to hold public hearings in order to explain their concerns and rationale to the affected customers. This is the responsibility of the municipality; however a postal representative should be available to answer any postal questions that arise.

The Postal Service will transmit one copy of the pertinent survey form to each occupied address deemed to be affected by the proposed ZIP Code boundary change. As specified on the survey form, respondents will be given a finite deadline for completion of the survey form and receipt by the designated postal official.

The criteria for evaluation of the survey responses are set in advance of the survey's distribution and the Postal Service must obtain written concurrence from the proponent before distribution of survey forms. At a minimum, the Postal Service must receive 50 percent or more of the originally disseminated survey forms from addresses to which they were originally sent; of that number, a majority (more than 50 percent) of responses received must support the proposed accommodation/ change before the results can be considered for approval, unless more stringent criteria is mutually agreed to in writing by the Postal Service and the proponent(s) of the change, in advance of commencement of the customer survey.

One survey form will be sent for completion to each occupied address deemed by the Postal Service to be affected by the proposed change. The survey form must:

- State that the Postal Service has received a request and identify the proponent;
- State the specific change being considered and the rationale for it;
- Identify known customer impacts (e.g., changes in last line of address, assignment to a different Post Office[™], changes in availability of left-notice mail, etc.);
- Request a response expressing agreement or disagreement with the proposal, and any comments;
- Explain that the change will be implemented if 50 percent of survey forms are completed and received by the requested deadline, <u>and</u> the majority (more than 50 percent or predetermined super-majority) of survey responses received support the change; and
- Identify the postal address to which completed forms must be mailed and the date by which they must be received.

A sample survey is provided in Attachment D.

Subsequent Municipal Requests

The ZIP Code Boundary Review Process emphasizes comprehensive, long-term planning by both municipal and postal managers. This helps to avoid frequent, disruptive changes in response to strip annexation or other actions.

To encourage this approach and help to ensure stability in the ZIP Code network, facility planning, and postal operations, once a request to match a municipal boundary has been accommodated, additional requests to amend that boundary will not be considered more frequently than once every 10 years.

ATTACHMENT A UNITED STATES POSTAL SERVICE ZIP CODE BOUNDARY REVIEW PROCESS

IDENTIFYING INTERNAL AND EXTERNAL ISSUES

This includes, but is not limited to, the following items:

Does the requested boundary represent a formally established municipal boundary, or is it based on subjective perceptions? *Note:* Boundaries designating school districts, voting precincts, telephone service areas, and similar territorial assignments are not, in themselves, appropriate for consideration.

Are the proposed boundaries cohesive and manageable, or will isolated pockets of deliveries be created? Will split sector-segments or block faces result?

Will the requested boundaries create duplicate street addresses within a ZIP Code? (Do not consider suffixes and pre- and post-directionals to be distinguishing features.)

Can the requested boundary be accessed efficiently, or is access restricted by man-made or natural barriers?

Will the affected deliveries be served from a different station or branch of the same Post Office, or by a different Post Office?

Can the gaining facility physically accommodate the change? Are new or upgraded facilities planned within the affected area?

Will the potentially transferred deliveries be served by the same form of delivery service in the gaining office (e.g., city, rural, or highway contract route delivery)?

Are there potential impacts to customer satisfaction, such as changes in parking availability, time of delivery to businesses, or locations and distances to travel for left-notice mail?

If other municipalities will be affected, what is their position regarding the change?

Will future annexation efforts generate ongoing requests for change in the affected area? If so, approximately how many deliveries would be involved?

ATTACHMENT B UNITED STATES POSTAL SERVICE ZIP CODE BOUNDARY REVIEW PROCESS

IDENTIFYING POTENTIAL ADMINISTRATIVE SOLUTIONS

Opportunities will vary by locale, but could include the following:

Use of municipal name in the mailing address (when the municipality is served by a single Post Office (including its stations and branches), and there is no duplicate name within the state).

Use of the intermediate office concept in rural delivery areas.

Long-term strategies to adjust ZIP Code boundaries in undeveloped areas.

ATTACHMENT C UNITED STATES POSTAL SERVICE ZIP CODE BOUNDARY REVIEW PROCESS

QUANTIFYING IMPACTS AND ESTIMATING COSTS

The following material is provided as a <u>general guide</u> to quantifying the impacts of a potential ZIP Code boundary change in response to a municipal request. Because each boundary situation is unique, some significant impacts may not be reflected in this outline and should be added locally. Conversely, some aspects of a proposal may not generate any measurable costs or savings.

Identify changes in the method of distribution, if any, that would result if the requested boundary were adopted. Consider automated, mechanized, and manual operations, including equipment needs and workload shifts, at mail distribution points and the associate offices involved.

For carrier operations, identify the number of deliveries and routes involved, specific changes in office and street duties that would result, and whether or not route inspections, mail counts and adjustments would be required. Identify the <u>net</u> impacts of the request, and identify any additional delivery equipment required to support the proposal (e.g., cases and vehicles), <u>or excess equipment</u> that would become available.

Determine specific abolishment, reassignment, and posting requirements for each affected position (clerical, delivery, support, and administrative) and its assigned employee, in accordance with the appropriate national and local agreements.

Methodology

Unless otherwise specified, use district cost and productivity data as of the immediately preceding month, excluding December, June, July, August, and September. Use the National Payroll Hours Summary Report to determine work hour rates, including benefits. Attach supporting documentation.

Misdirected Mail

The cost of handling misdirected mail is not itemized below, but it is a critical element. Mail that is undeliverable due to Postal Service adjustments, as is the case for ZIP Code boundary changes, is not processed through the Computerized Forwarding System, although the changes themselves are made available to mailers through Address Information System data files.

Instead, mail that cannot be immediately captured through doublelabeling of automated, mechanized, and manual equipment must be rehandled. Depending on the specific situation, the types and amounts of misdirected mail that will incur a re-handling expense may vary dramatically.

For example, adjustments of territory involving two cities whose mail is processed by a single Processing and Distribution Center (P&DC)

should generate less misdirected mail than adjustments involving more than one P&DC. The degree to which distribution is automated or mechanized, readability rates, and the processing of Standard Mail and USPS[®] Retail Ground mail may be factors. Local experience with other ZIP Code changes may provide an historical estimate of increased misdirected volume relative to the number of affected deliveries. Each district must evaluate potential factors carefully and arrive at its own cost estimates for re-handling of misdirected mail.

Estimating Postal Costs: "One-Time" Costs

- 1. Address Management: Data Revision and Mapping, hours x rate.
- Engineering and Technical Support: Programming hours x rate for LDC.
 Engineering and Technical Support: Revised Facility/Floor Plans Hours x rate for LDC.
- Facility Costs: Design Provide estimate <u>only</u> if significant revisions to contracted designs will be required as a result of the proposed change and additional cost will be incurred.
- Distribution: Scheme Training Scheme changes, divided by sixteen = training hours; training hours x clerks requiring training x rate for PS Grade Level.
- 5. Distribution and Delivery: Equipment For use only if the proposal will create a requirement for additional equipment, or result in excess equipment that would not otherwise have been required or available. Excess items must be credited as a savings. For automated, mechanized or manual distribution equipment and carrier cases, use current supply center or contract cost. For delivery vehicles, assume a cost of \$20,000. Item x quantity x cost.
- 6. Delivery: Route Inspections and Adjustments Due to Transfers of Territory Between 5-digit Areas.

City Routes:

- For 1-5 routes, 23 hours per route x LDC 20 rate.
- For each 5-route increment, 23 hours for the first route and 19 hours for each of the remaining 4 routes.
- If DSIS software is used to complete the time card analyses and calculate Forms 1840 and 1838, reduce the total work hours required by 4 hours per route.

Rural Routes:

 Estimated supervisory hours to conduct inspections, adjustments, and special mail counts required as a result of the proposal x LDC 20 rate.

If route inspections or adjustments are anticipated in the foreseeable future, a potential accommodation should be considered at that time, to mitigate the costs. Relocation/Replacement of Equipment and Supplies: (Physical move, new facility plaques, meter dies, etc.) Estimated expenses.

Estimating Postal Costs: Recurring Costs

- Facilities: Floor Space Requirements
 For use if the proposal will create a requirement for additional space that is unavailable in the impacted facility. If the gaining and losing facilities are scheduled for expansion or replacement and the potential impact of a boundary change can be incorporated during planning or construction stages, only the net change in facility costs due to the proposal should be reported. For example, a space requirement could be readily shifted to another site, but a dramatic difference in real estate values or lease rates could impact the total costs. Include operational and support space required. The representative annual cost per square foot x footage.
- 2. Delivery Operations:
 - City Carrier Travel
 - Net change in daily mileage (+ or -) x LLV cost per mile x 302 delivery days.
 - Rural Carrier Equipment Maintenance Allowance:
 - Net change in daily mileage (+ or -) x current per mile rate of EMA x 302 delivery days.
- 3. Clerical, City or Rural Carrier Work Hours:
 - Net changes in work hours, complement, and unique impacts only. Report net changes in bargaining unit complement by LDC. Generally, work hours will shift commensurate to workload, forming a constant. In some cases, however, impacts <u>created or eliminated</u> by the proposal may be significant. Report the net impacts only.
 - For example, volume formerly processed in a mechanized operation and now forced into a manual operation at a lower rate of productivity is reportable. In city delivery, 7 minutes daily additional "deadhead" travel time to reach an isolated delivery pocket might result and would be reportable.
 - Use the <u>net change (+ or -)</u> in daily work hours x the rate per hour for the appropriate LDC x 302 days.
- 4. Management/Support: Work Hours and Complement In some cases, transferred workload will create or increase the Postmaster grade or complement in the gaining office, and may or may not be offset by a decrease in the losing office. Supervisory and custodial work hours may be impacted, in particular. Report net impacts in work hours, salaries, and complement.

ATTACHMENT D UNITED STATES POSTAL SERVICE ZIP CODE BOUNDARY REVIEW PROCESS

[SAMPLE SURVEY]

[USPS Letterhead]

AN IMPORTANT SURVEY ABOUT POSSIBLE POSTAL CHANGES

Dear Postal Customer in ZIP Code XXXXX:

On behalf of customers in your area, [proponent] has requested that the Postal Service [accept the name XXXX in your last line of address, provide service to your area from another Post Office, etc.]. According to [proponent], the benefits of this change are [recognition of actual municipal identity, elimination of duplicate addresses, etc.].

This survey form has been developed to determine the preferences of affected addressees. One copy has been sent to each occupied address in ZIP Code [XXXXX] deemed to be affected by the proposed change. The Postal Service is willing to make this change if at least 50 percent of survey responses are returned, and the proposal is supported by ["a majority (more than 50 percent) of survey responses received" / "at least (specify designated super-majority percent) of survey responses received"] no later than [month, day, year].

FOR YOUR PREFERENCE TO BE CONSIDERED, YOU MUST RESPOND TO THIS SURVEY ENSURING THAT IT IS COMPLETED LEGIBLY AND COMPLETELY AND RETURNED TO THE ADDRESS INDICATED HEREIN BY THE ABOVE DATE.

EFFECTS OF THE CHANGE:

If the request is approved, you will (be able to use XXX in your last line of address with the ZIP Code XXXXX; be required to change your last line of address to...; need to notify correspondents of your new mailing address; pick up left-notice mail from the X Post Office; experience brief delays due to mail being redirected; no impact; etc.) This change would be effective [date].

DO YOU SUPPORT THE REQUESTED CHANGE?

YOUR NAME:_____

YOUR SIGNATURE:

(Type or print legibly)

YOUR ADDRESS

(Type or print legibly)

PLEASE SUBMIT ANY WRITTEN COMMENTS ON THE REVERSE SIDE OF THIS SURVEY FORM.

Thank you very much for your assistance.