

# LOMURRO | DAVISON

LOMURRO DAVISON EASTMAN & MUÑOZ P.A.

RECEIVED  
Postal Regulatory Commission  
Office of the Chief Admin. Officer

June 23, 2011

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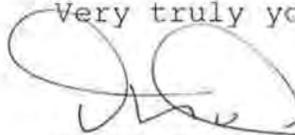
Postal Regulatory Commission  
901 New York Avenue NW  
Suite 200  
Washington, DC 20268-0001

RE: Petition for Review of Closure Decision -  
Postal Service Facility at 13 Lafayette Street,  
Freehold, New Jersey 07728

Dear Sir/Madam:

I am the Township Attorney for the Township of Freehold, Monmouth County, New Jersey. Enclosed please find the Township's Petition for Review of the above referenced closure decision.

Very truly yours,



DUANE O. DAVISON,  
Freehold Township  
Municipal Attorney  
[ddavison@lomurrolaw.com](mailto:ddavison@lomurrolaw.com)  
732-410-2318

DOD/ma

Enc.

cc: Freehold Township Committee  
Peter R. Valesi, Township Administrator  
Teresa Warner, Township Clerk  
Timothy White, Township Engineer

**PETITION FOR REVIEW (APPEAL) OF FINAL  
DECISION TO CLOSE POSTAL FACILITY LOCATED  
AT 13 LAFAYETTE STREET, FREEHOLD, NJ**

**Petitioner:** Township of Freehold, located in Monmouth County, New Jersey, for and on behalf of its residents who regularly utilize a.) the Postal Service Facility at 13 Lafayette Street, Freehold, New Jersey ("Lafayette Street Facility") which is scheduled to be closed, and b.) the Postal Service Facility at 200 Village Center Drive, Freehold, New Jersey ("Village Center Drive Facility") which will receive a large portion of the patrons currently using the Lafayette Street Facility.

**Respondent:** United States Postal Service.

**Decision Under Appeal:** United States Postal Service final decision to close the Lafayette Street Facility as set forth in a letter dated May 25, 2011, attached hereto as Exhibit "A" ("Final Decision").

**Reasons for Appeal:**

1. The Final Decision results in those persons and businesses who currently use the Lafayette Street Facility transferring to the Village Center Drive Facility. As documented in the exhibits which are listed below, the Village Center Drive Facility is currently inadequate to service even its current customer base. It is poorly designed, has inadequate and dangerous access, inadequate

parking, inadequate staffing, is cramped<sup>1</sup>, overcrowded<sup>1</sup>, and congested<sup>1</sup>.

2. The poor conditions of the Village Center Drive Facility as listed in No. 1 above will be severely exacerbated by shifting significant patronage from the Lafayette Street Facility to the Village Center Drive Facility. Census data supports an estimate of a 33% increase in served population for the Village Center Drive Facility if closure of the Lafayette Street Facility proceeds. This circumstance will be to the significant detriment to the residents of the Township who utilize the Village Center Drive Facility.

3. Although the distance between the Lafayette Street Facility and the Village Center Drive Facility is only 2.5 miles, as attached, during most times of the day, the traffic congestion is such as to make this a trip which will consume 30 minutes on a good day and 45 to 60 minutes during peak traffic periods.

4. Unlike the Lafayette Street Facility, the Village Center Drive Facility is inaccessible to pedestrian traffic, being located adjacent to a four lane, high traffic County highway with no sidewalks.

5. Freehold Borough is the County Seat for the County of Monmouth. It's population growth since 2000 has been 15% - 1½

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<sup>1</sup> Quoting July 13, 2009 correspondence from Congressman Christopher H. Smith. See Exhibit "B".

times the national average if the Lafayette Street Facility is closed, will have the distinction of being the only County Seat in the State of New Jersey without its own postal facility.

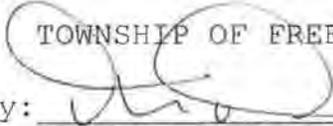
6. The Lafayette Street Facility is located in the middle of Freehold Borough where, according to Census figures, 14.2% of the households do not have use of a motor vehicle. In the entire 07728 zip code area, 1,325 homes do not have use of a motor vehicle. Forty (40%) percent of such homes are within walking distance of the Lafayette Street Facility.

**Oral Argument:** The Township reserves its right to request oral argument and hereby requests that it be included in oral argument if same is granted to any other Petitioner.

**Exhibits Referenced and Relied Upon Herein:**

1. Letter dated July 13, 2009 from Congressman Christopher H. Smith to Ms. Megan Brennan, Vice President of Area Operations, United States Postal Service - Eastern District - designated Exhibit "B".
2. Memorandum dated June 22, 2011 from Timothy P. White, Freehold Township Engineer to Peter R. Valesi, Freehold Township Administrator - designated Exhibit "C".
3. Letter dated December 21, 2009 from Freehold Township Mayor, Anthony J. Ammiano to Ms. Carolyn Lewis Gallagher, Chair, Board of Governors, US Postal Service - designated Exhibit "D".
4. Letter dated November 16, 2009 from William J. Mehr, Esq. to Denise Mason, Manager Post Office Operations, South Jersey District - designated Exhibit "E".
5. Memorandum dated June 23, 2011 from Freehold Township Administrator to Duane O. Davison, Esq., Freehold Township Attorney - designated Exhibit "F".

It is respectfully requested that the Postal Regulatory Commission reverse the determination to close the Lafayette Street Facility.

TOWNSHIP OF FREEHOLD  
By:   
DUANE O. DAVISON  
Freehold Township  
Municipal Attorney

DATED: 6-23-11

DISTRICT MANAGER



SOUTH JERSEY DISTRICT

May 25, 2011

Post Office Box Customer  
Lafayette Trailer, Freehold NJ 07728

This is to inform you of the U.S. Postal Service's decision to close the Lafayette Trailer located at 13 Lafayette Street, Freehold NJ. We advised you in July of 2009 of our intent to conduct a feasibility study and the final decision has been made. This trailer will close at the end of business on July 29, 2011.

Because of the drastic decline in mail volume, the Postal Service is in a fiscal crisis and must take action to reduce the size of its retail and delivery network. By consolidating, streamlining and adjusting our operations, the Postal Service becomes a more efficient and effective organization.

I want to assure you that the community's input was received and carefully considered before making this decision. Ultimately, based on all of the factors involved, the decision was made to proceed with the closure.

As a Post Office box customer, you have the option of continuing your Post Office box at the Freehold Post Office located at 200 Village Center Drive. You will not be required to change your mailing address if you choose to continue your Post Office Box at the new location. Once the trailer is closed, you will be required to exchange your current box keys for the new box keys at the Freehold Post Office. You will also need to complete a new PS 1093, *Application for Post Office Box Service*. Full retail service hours at the Freehold office are from 8:30 a.m. to 5 p.m. Monday through Friday, and 9 a.m. to 1 p.m. on Saturday. The Post Office box lobby is open from 6 a.m. to 7 p.m. Monday through Saturday.

Local mail delivery will not be affected by this move. Full retail services will still be available in neighboring offices and our customers will continue to receive the same excellent service they always have.

The Post Offices, stations or branches nearest to your residence are located at:

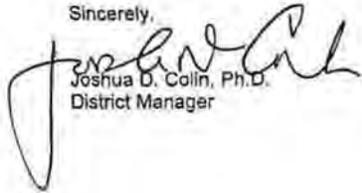
- Freehold Post Office – 200 Village Center Drive, Freehold NJ 07728
- Adelphia Post Office – 16 Wyckoff Mills Road, Adelphia NJ 07710
- Tennent Post Office – 420 Main Street, Tennent NJ 07763



However, a trip to the Post Office can be skipped altogether and you can purchase stamps and shipping labels online using the Postal Service's website, [usps.com](http://usps.com). You can also request free package pickup at [usps.com](http://usps.com). The Postal Service will pick up packages during regular mail delivery the next business day – and, unlike other shipping companies, there is no fee for this service. Postage stamps can also be purchased at 1.800.STAMP.24, thousands of banking ATMs and in more than 63,000 retail outlets across the nation.

If you have questions, or need additional information, please contact the Freehold Post Office at 732-431-4525.

Sincerely,



Joshua D. Colin, Ph.D.  
District Manager

P O Box 9001  
BELLMAWR NJ 08019-8897  
856-933-4460  
FAX: 856-933-4004

**CHRISTOPHER H. SMITH**  
6TH DISTRICT, NEW JERSEY

CONSTITUENT SERVICE CENTERS:

1540 Kuser Road, Suite A9  
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TTY (609) 585-3660

108 Lacey Road, Suite 38A  
Whiting, NJ 08759-1331  
(732) 350-2300

2373 Rayburn House Office Building  
Washington, DC 20515-3004  
(202) 225-3765

<http://chrismsmith.house.gov>



**Congress of the United States**

**House of Representatives**

July 13, 2009

COMMITTEES:

FOREIGN AFFAIRS

AFRICA AND GLOBAL HEALTH  
SUBCOMMITTEE  
RANKING MEMBER

WESTERN HEMISPHERE  
SUBCOMMITTEE

COMMISSION ON SECURITY AND  
COOPERATION IN EUROPE  
RANKING MEMBER

CONGRESSIONAL-EXECUTIVE  
COMMISSION ON CHINA  
RANKING MEMBER

DEAN, NEW JERSEY DELEGATION

Ms. Megan Brennan  
Vice President of Area Operations  
United States Postal Service - Eastern District  
1 Marquis Plaza  
5315 Campbells Run Road  
Pittsburgh, Pennsylvania 15277-0001

Dear Ms. Brennan,

I am writing to request your personal review of a proposal to close the Freehold, New Jersey Downtown Station, an issue that has been pending for some time and which, more recently, has been significantly mishandled by postal officials at the South Jersey District.

In February, I had been advised by local officials in Freehold Borough and Freehold Township, New Jersey, that the Central New Jersey District had determined to close the Freehold Downtown station. After contacting the District Manager, I co-hosted a meeting on March 16, 2009 in Freehold Borough with a number of public leaders from State, County and Municipal levels who are thoroughly familiar with the commercial and residential activity in the area, the infrastructure needs, and commuter patterns—items that can impact customer access and service at a postal facility.

At the meeting, Central District Manager Priscilla Maney was specifically asked and specifically responded that no decision had yet been made by the local USPS District to close the Freehold Downtown Station. We were also advised that the USPS proposal includes a shift of the work from the Downtown Station to the already cramped, overcrowded and congested Freehold Township Post Office. Post officials reported at the meeting that the decision would be predicated in part on the costs and projected cost savings of moving the workload out of the Borough to the Township. However, they also stated that they were unable to provide any estimates of the direct or indirect costs to the USPS to design and construct a new parking lot, sidewalks and curbs, add P.O. boxes and adjust staffing for expected increased volume at the Township facility. Thus a second, follow-up meeting was promised by the USPS, at which this cost information would be presented and the proposal would be further discussed. (See enclosed letter.)

I think it is important to note, that as our local coalition awaited the information and the scheduling of a follow up meeting for the local officials, Jeff Sagnip, my Public Policy Director was in touch with postal district officials especially after the postal service completed its

cc: TC  
P. Valesi  
P. Hopkins

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restructuring and placed the Freehold Downtown Station in the newly defined South Jersey District.

It is deeply disturbing that the USPS switched gears and made an abrupt decision late last week without following through on its commitment to local leaders to provide cost information and an opportunity to further evaluate and understand the basis of the proposal. As a result, it is unclear as to what information was used to make this announcement and if local and customer information was taken into account.

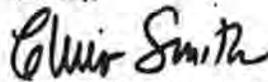
On background, please be aware that thousands of USPS customers are affected. The Freehold Downtown Station serves the Borough (pop. 11,456), much of neighboring Freehold Township (pop. 35,575), and municipal, county and state offices located in the Borough. The Borough is the center for and seat of government of Monmouth County (pop. 655,674)—fourth largest in the State. All 21 towns in New Jersey which are home to their county government have a post office facility.

The Freehold Downtown Station remains a model example of a cost effective, federal-local cooperative effort that benefits the financial interest of the taxpayer, the USPS and its customers. This station is provided to USPS customers at a significantly reduced cost, since the land, including a spacious parking lot, is provided by the county free of charge. The annual cost to lease the 800 square-foot temporary structure is only \$12,000, a bargain for the USPS.

The USPS has clearly not lived up to promises, particularly in regard to its obligation to comply with the reasonable requests of local officials for additional information before a final decision was made. Therefore, I respectfully request that you personally engage in this unfortunate oversight on the part of the South Jersey District, which now indicates it plans to close the station and completely eliminate service in Freehold Borough by mid August.

I have long had great respect for the work the USPS performs. I look forward to your reply to have the South Jersey District both provide the promised cost information and arrange the promised meeting before a final decision is rendered. Please feel free contact me for any additional information.

Sincerely,



CHRISTOPHER H. SMITH  
Member of Congress

CHS:jgc

CC: Joseph Diglio, District Manager, USPS South Jersey District



## MEMORANDUM

TO: Peter R. Valesi, Township Administrator  
FROM: Timothy P. White, Township Engineer  
DATE: June 22, 2011  
RE: Village Center Drive – Post Office Parking Lot & Access Drive

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Per your request I have reviewed the parking lot and access drive at the above location. The parking lot consists of 26 – 10' x 18' parking spaces and 2 – 8' x 18' handicap parking spaces. All parking spaces are perpendicular to the curb. A 25' wide two-way aisle separates two balanced modules of spaces. A turn-a-round area exists at one end of the lot and a 25' wide curvilinear two-way access drive is at the other end.

Although a high turnover exists at the post office, trip generation during peak hours and on weekends results in a constant queue or backup extending into Village Center Drive for vehicles entering the site. A similar queue also exists for vehicle exiting the site due to the volume of traffic on Village Center Drive.

The geometry of the access drive is curvilinear and aligned along a "reverse curve". The curves are extremely sharp and the angle of approach entering the parking lot is not straight-in. Heavy pedestrian traffic within the parking lot exists due to the high turnover. The two-way aisle traffic and the single entrance/exit increase traffic conflicts points. As a result of all of these conditions, although most drivers are familiar with the site, capacity of the parking lot is further reduced and cause congestion.

It should also be noted that the lot was overlaid in 2010. Prior to the lot being overlaid, the Township requested that repairs be made on numerous occasions due to failing pavement. Among other reasons, pavement failure results from heavy use. For all of the above reasons, it is my opinion that the parking lot and access drive does not properly service the post office and also causes Village Center Drive to backup and therefore the lot should be improved.

Please call me if you have any questions regarding this matter.

cc: Duane O. Davison, Township Attorney



# TOWNSHIP OF FREEHOLD

**MAYOR**  
*Anthony J. Ammiano*  
**TOWNSHIP COMMITTEE**  
*David M. Salkin, Deputy Mayor*  
*Dorothy H. Avallone*  
*Eugene B. Golub*  
*Robert C. McGirr*

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*"Preserving and Enhancing the Quality of Life"*

December 21, 2009

Ms. Carolyn Lewis Gallagher, Chair  
Board of Governors, US Postal Service  
475 L'Enfant Plaza, SW  
Room 10300  
Washington, DC 20260

Dear Governor Lewis:

I am writing on behalf of the Township Committee of the Township of Freehold and the Freehold Township residents to express concern with the letter received by many constituents of Freehold Township and Freehold Borough from Denise Mason. Of particular concern were her remarks indicating that the Postal Services continuing to consider consolidation of the Freehold Borough Post Office into the Freehold Township Post Office. On behalf of the residents of Freehold Township, fifteen thousand of whom are served by the Freehold Borough Post Office, we strenuously oppose this endeavor and we believe that, along with Congressman Chris Smith, we had been assured that the Freehold Borough Post Office would not be considered for consolidation until more accurate information on customer service use and satisfaction was collected.

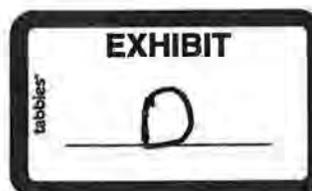
Freehold Borough is the county seat of Monmouth County and home to the county's courthouse and administration building. The downtown business district includes many small businesses that rely heavily on the mail service to communicate with their customers and clients. To deny them the use of the Freehold Borough Post Office would be to put them at a considerable disadvantage and place a tremendous strain on their business communications.

Freehold Borough and Freehold Township are two individual jurisdictions, each with their own government and municipal services. The location of these two offices compliments the distribution of the customers in Freehold Borough and Freehold Township. If the Postal Service were to consolidate these two locations to the Freehold MPO, a lack of parking at that location would discourage many customers from using the Postal Service. The purposed consolidation would exacerbate an already excessive waiting time for customers served at the Freehold MPO.

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1 MUNICIPAL PLAZA • FREEHOLD, NJ 07728-3099 • PHONE (732) 294-2000 • FAX (732) 462-7910  
[www.twp.freehold.nj.us](http://www.twp.freehold.nj.us)

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We would respectfully request that the following considerations be factored in to any decision made concerning closing the Freehold Post Office:

1. A lack of parking, inadequate vehicular circulation and unsafe conditions of the access to the Freehold MPO facility.
2. The excessive waiting time at the Freehold Township facility.
3. The inability of a large pedestrian population (many of which are senior citizens) to be able to access postal services if the Freehold Borough location is closed.
4. The removal of postal services from the Monmouth County seat.

On behalf of the thousands of residents served by the Freehold Borough postal facility, we implore you to reconsider any position that involves closing Freehold Borough Post Office. On behalf of the Township Committee and our residents we thank you for your continued time and assistance in this matter.

Sincerely,

ANTHONY J. AMMIANO  
FREEHOLD TOWNSHIP MAYOR

AJA/ph

cc: Congressman Christopher Smith  
NJ State Senator Jennifer Beck  
NJ Assemblyman Declan O'Scanlon  
NJ Assemblywoman Caroline Casagrande  
Director Monmouth County Freeholders, Barbara McMorrow  
Freehold Borough Mayor, Michael Wilson  
Freehold Center Partnership/Downtown Freehold CEO, A. Richard Gatto

MEHR, LaFRANCE & WILLIAMS  
ATTORNEYS AT LAW  
10 EAST MAIN STREET  
FREEHOLD, NEW JERSEY 07728

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E-MAIL - billmehr@mfwlaw.net

WILLIAM J. MEHR  
PETER R. LaFRANCE  
MARK WILLIAMS

PLEASE REPLY TO  
P.O. BOX 680  
FREEHOLD, N.J. 07728

November 16, 2009

Denise Mason  
Manager Post Office Operations  
South Jersey District  
501 Benigno Blvd.  
P.O. Box 9001  
Bellmawr, NJ 08099-9992

RE: Lafayette Station/Trailer Station

Dear Ms. Mason:

I am writing this letter in response to the undated November 2009 letter put into our postal boxes at the Freehold Lafayette Station/Trailer providing the results of the questionnaire that was tendered last month by the Postal Service. As with any poll/questionnaire, the results of the questionnaire can be interpreted by interested parties in the light that is most favorable to what they want to accomplish. In this case, of the 375 questionnaires that were distributed (I guess into the postal boxes located within the trailer, although it does indicate that additional questionnaires were available at the counter/lobby desk for walk-in customers to take or request during the survey period), the summary indicates that 184 questionnaires were returned and of that amount, 19 (or slightly over 10%), provided favorable responses, 86 (or almost 47%) had unfavorable responses, and the remaining approximate 43% responded with "responses expressing no opinion". It would be interesting to see what criteria was used to determine that someone was responding "expressing no opinion" whether the closure was good or bad; since why else would one respond to the questionnaire which was directed as to whether or not the Trailer should be closed down. One would expect that any kind of indication that the closing of the Trailer would cause a hardship to the respondent should be deemed to be an unfavorable response, rather than a response "expressing no opinion".

Regardless of that, to lump together favorable responses with the subjective responses "expressing no opinion" to indicate that 53% of the respondents do not oppose the closing of the Lafayette Station Trailer is ludicrous. Almost 47%, or almost 1 out of every 2 respondents, oppose the closure, while only 10% actually were favorable to the closure. That is a ratio of almost 5:1 opposed versus those who thought the Trailer should be closed.



To then add to the favorable responses and the subjective responses expressing no opinion, those surveys that were not returned, and draw a conclusion that 77% of the customers have no known opposition to the closing of the Trailer, is even more absurd. It is typical when questionnaires or surveys are tendered to people that they do not take the time to fill them out. A 50% response, which effectively is what you have here, of people who at least returned the questionnaire, is an excellent response and shows substantial interest in the maintenance of the Station/Trailer. To assume that someone who received a questionnaire and did not take the time to fill it out and return it, is in support of the proposal to shut down the Trailer, has no merit or basis in fact.

In fact, if you were to take the 86 unfavorable responses and indicate those people who "did not express an opinion" as being unfavorable, rather than in favor of closing the Trailer, the percentage of returned questionnaires opposing the Trailer closure would be approximately 90%. If you are going to make an assumption regarding people's response, that is just as valid as the conclusion that the Postal Service reached.

In addition to the above, in reviewing the "postal concerns" I note that of the 17 questions that were responded to, the great majority of them are related to resident concerns versus those of the business community. It is correct that the Freehold Township Main Post Office is 2.5 miles away from the downtown area. It should be noted that there is inadequate bus service or other public transportation to take people from the downtown area to that post office on a regular basis. It should also be noted that many times the actual time spent traveling from downtown Freehold Borough to the Main Post Office in Freehold Township and back to Freehold Borough is 30 minutes during most of the day and 45 to 60 minutes during peak traffic time due to traffic conditions and the number of intervening traffic lights. In addition to that, there is inadequate parking at the Main Post Office location in a poorly designed parking lot and entry area, and there is inadequate staff provided during peak business hours to promptly respond to business customer needs. During holiday season, this Post Office which serves a residential population close to 50,000 people in addition to two separate towns' business districts, has insufficient space in the lobby to promptly and properly handle not only the mail processing requirements, but also package processing. The maintenance of the Trailer in Freehold Borough actually relieves the pressure on the Main Post Office during peak periods.

With the quantity of business related mail that is processed through the Lafayette Station/Trailer on a daily basis from the businesses within the downtown area and the area around the Court House, if the Lafayette Station/Trailer closes down, it is unlikely that the existing mail carrier cohort servicing the Freehold Borough Center area could handle the increased mail delivery required, as well as mail pick-up at business locations to insure that mail would be delivered in the shortest possible time frame. There are many days that mail is delayed either due to processing delays at the Regional Centers and at the Freehold Main Post Office where due to the amount of second and third class mail being handled, first class mail is delayed in delivery. The delay is evidenced when a series of mail pieces originating from the same location, are printed and post marked at the same time, and are delivered over a period of several days rather than all on the same date. Having the Postal Trailer

in the downtown and with much outgoing mail being taken directly to the Postal Trailer on a daily basis, and the majority of the mail being processed by the local Post Office and being delivered at the same time through the postal service boxes, result in a substantially reduced amount of mail being delivered by the mail carrier.

As for the question regarding whether Freehold Borough deserves its own post office because it is a County seat, that is not a situation characterized simply as a "community identity" question. This question relates to the fact that County seats are major locations of business and commerce in each county of the State of New Jersey, and I am sure the same applies throughout the United States. Perhaps you can check the Postal Service records to determine what percentage of county seats within the United States do not have main post office stations, or at least satellite stations. I am sure your report will indicate that probably significantly less than 5% of county seats throughout the Country do not have either a main post office or satellite to serve them. In fact, in many county seats in the State of New Jersey there are several postal stations, normally one being a main station and the remaining being satellite station(s). Freehold Borough is the main business cross roads in Western Monmouth County due to its location, as well as its being the County seat, and containing all courtrooms. Not having a post office or satellite station within the Borough in the general area of the Court House and County Administration buildings will cause a substantial disruption to the business community. In addition, since there is not frequent public transportation service from downtown Freehold to the Freehold Township Main Post Office, removing the Trailer from a municipality that has approximately 10,000 residents, is a severe hardship on the residents, particularly those who do not have cars, or are senior citizens. In addition, we have a large Hispanic population of legal and illegal immigrants who do not have cars and utilize many local services. Having a satellite post office in the Borough also serves their needs.

Having postal service at the Township Main Post Office that is approximately 2.5 miles away solves neither the Borough residents' or business' needs for a post office within walking distance of the Freehold Business Center and surrounding residential areas. Closing the Lafayette Station/Trailer does nothing to improve postal service and will only drive more people to utilize alternate services for written communications. In fact, if you keep on rationalizing survey statistics, like you did here in Freehold, you can probably eliminate the Postal Service altogether as the great majority of Americans would simply "express no opinion".

Respectfully submitted,

Mehr, LaFrance & Williams, Esqs.

By: \_\_\_\_\_  
William J. Mehr, Esq., Managing Partner

WJM/pk  
cc: Catherine Sinesi, Manager Consumer Affairs  
Richard Gatto, CEO, Downtown Freehold – Freehold Center Partnership

RE: Lafayette Station/Trailer Station

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page 4

Joe Bellina, Freehold Borough Administrator  
Terri O'Connor, Deputy County Administrator

## MEMORANDUM

TO: Duane O. Davison, Esq.  
Township Attorney

FROM: Peter R. Valesi,  
Township Administrator

DATE: June 23, 2011

SUBJECT: Freehold Borough Post Office Closing  
Population Data

I have researched the Census data for Freehold Township, Freehold Borough, the West Freehold Census Designated Place (CDP) and the East Freehold CDP. In addition to these Census tracts, I also analyzed Census data for the 07728 zip code.

The first discussion point for the population is the latest Census data shows that Freehold Township has a population of 36,184. Freehold Borough has a population of 12,052. By population alone, this would designate the Freehold Township Village Center Drive Post Office with a 33% increase in served population, a figure which would operationally paralyze most of the operations of any business.

A more interesting and pertinent fact in the local Census data is the number of households without vehicles throughout the zip code. For background, Freehold Borough is a semi-urban neighborhood community of which 39% of residential units are rented versus owned. Of the 3,695 residential units in Freehold Borough, 525 of them (or 14.2%) do not own or have use of a vehicle. In the entire 07728 zip code area, 1,325 homes do not have use of a vehicle and 40% of those non-vehicular homes are within walking distance of the Freehold Borough Lafayette Street Post Office. When compared to the Freehold Township Census areas, where over 96% of homes have a vehicle, the numbers relating to pedestrian traffic to the Freehold Borough Post Office are evidence enough for the need of a local Post Office in that area.

Lastly, population growth is a factor in Freehold Borough that cannot be ignored. While Freehold Township's population growth was at the U.S. average of approximately 9.8% (U.S. was 9.7%) since 2000, Freehold Borough's population grew by nearly 15%. The population density of the Borough increased from 5,500/sq. mi. to 6,026/sq. mi.

I trust that this information is sufficient for inclusion in your appeal submission brief. Noting the above, demographics, density and proximity are all statistical factors that point towards the need for a Borough Post Office. Should you have any questions or require any additional information, please do not hesitate to contact me.

PRV/smm

