

CA - Edison

1/15/7(p)

IsJkuore: formal objection. recognizing  
Middlesex County as a standard metropolitan  
Statistical area

P.i. 3789, 1219

pg A.

CA 001348 L



**Township of Edison**  
Middlesex County, New Jersey 08817

**FILED**

**JAN 19 1976**

**MMD O. FURMAN, J.S.C.**

January 15, 1976

Hon. David D. Furman  
Middlesex County Courthouse  
New Brunswick, New Jersey 08903

Re: Urban League of Greater New Brunswick  
et al v. Mayor and Council of Carteret, etc.  
Docket No. C-4122-73

Dear Judge Furman:

This letter is to formally object to the plaintiff's application to you that the Court take judicial notice of the designation of Middlesex County as a standard metropolitan statistical area.

More specifically, I protest against any assumption, presumption, or judicial notice that would establish or tend to establish Middlesex County as a "region" in the context of fair-share housing.

A book published by Rutgers University, and copywrited in 1974 by the Center for Urban Policy Research, entitled "Land Use Controls: Present Problems and Future Reform", edited by Davis Listokin is a composite of the writing of several researchers which deals with very many aspects of the problem which are the gravamen of the captioned matter.

All of these writers agree that the boundaries of Middlesex County do not coincide with the concepts of a "region" in the context of this litigation.

To the Township of Edison, which I represent, the definition of the region is critically important because Edison is neither a "developed" nor a totally "undeveloped" community. Ergo, Edison's "fair-share", if any, will be judged in accordance with the comparison of its present development to the rest of the "region".

This is a factual question, and, an all together important one.

Respectfully yours,

Roland A. Winter

RAW/flf  
cc: All Attorneys

*Edison*

CA001348L