

6-25-84

AMG

Memo from judge to All Counsel
re: Caton's computerized figures
-w/Caton's assessment of computerized

Pgs. 5
Pi # 3354

AM000158D



CHAMBERS OF
JUDGE EUGENE D. SERPENTELLI

Superior Court of New Jersey

OCEAN COUNTY COURT HOUSE
C. N. 2191
TOMS RIVER, N. J. 08753

June 25, 1984

Memo to All Counsel

Re: AMG v. Township of Warren

I am enclosing a copy of a letter received from Philip Caton regarding his measurement of the commutershed. In the event that I should decide to utilize the thirty minute commutershed approach for any purpose, I intend to rely upon Mr. Caton's findings unless I receive specific objections, within five days, from any party to these proceedings.

In the event of an objection, it will be necessary to have an additional hearing.

EDS:RDH

Eugene D. Serpentelli, JSC

CLARKE & CATON

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June 20, 1984

The Honorable Eugene D. Serpentelli
Judge of the Superior Court of New Jersey
Ocean County Court House
CN2191
Toms River, NJ 08753

RECEIVED
JUN 21 1984
CLARKE & CATON

Re: Warren Township

Dear Judge Serpentelli:

This letter is in response to your request that I examine the commutershed region of Warren Township, Somerset County to determine whether or not Hudson County should be included therein.

After consultation with Messrs. Chadwick, Coppola, Moskowitz and Reading and as a result of my own independent assessment I conclude that Hudson County is not within Warren Township's commutershed region as that term has been defined in the concensus approach drafted by Carla Lerman. The basis for this determination and my approach to the issue are described below.

First of all, the planners involved in this case do not agree on the functional center of the Township. However, since neither point of origination is within 30 minutes driving time of Hudson County it was not necessary to refine the selection to one single position. Indeed, the two points are both centrally located in Warren Township and are separated by just over one mile.

As is evident by the attached Exhibit, four different routes were measured from each point of origination. The closest measured drive time to Hudson County was 30.8 minutes and the furthest was 33.8 minutes.

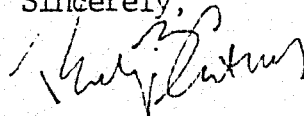
The Warren Township Planning Board Base Map (scale 1": 1,600') was used to calculate the distances on local roads in the Township leading to I-78. Thereafter the distances on the major highway network were measured at short intervals on the General Highway Map Series of the NJ Department of Transportation (scale 1": 2,640'). This map series is particularly useful for

regional determinations since the entire state is mapped at one large scale in 64 sheets which match accurately to each other. This diminishes the opportunity for error which is involved with transferring from maps at different scales and possibly published by different organizations.

Naturally there is always the possibility of human error affecting these measurements. I attempted to minimize that variable by using the standard NJDOT map series at the largest available scale and by measuring with dividers at relatively short intervals (in order to measure even subtle bends in the road). Please understand that I make no claim to be more accurate in the actual mechanics of measuring than any other planner who approaches the task carefully.

However, given the procedure outlined above and my results there is simply no basis for me to conclude other than that Hudson County lies outside Warren Township's commutershed region. I hope that this information is of assistance to the Court.

Sincerely,



Philip B. Caton, AICP

PBC:cjl
Attachment

Starting Point #1 is the intersection of King George and Mount Horeb Roads

Starting Point #2 is on Mount Bethel-Warrenville Road at a point 1,000 feet north of the intersection with Mount Horeb Road

	<u>Minutes</u>
1A. Starting point #1 to I-78 (1.78 miles @ 30mph):	3.6
I-78 to US 1/9 (20.6 miles @50 mph):	24.7
US 1/9 to Hudson County Boundary (Kearny) (2.9 miles @40 mph):	4.4
Total	<u>32.7</u>
1B. Starting point #2 to I-78 (2.01 miles @ 30 mph):	4.0
I-78 to US 1/9 (20.6 miles @ 50 mph):	24.7
US 1/9 to Hudson County Boundary (Kearny) (2.9 miles @ 40 mph):	4.4
Total	<u>33.1</u>
2A. Starting point #1 to I-78 (1.78 miles @ 30 mph):	3.6
I-78 to NJ Turnpike Exit 14 (20.25 miles @ 50 mph):	24.3
Exit 14 to Hudson County Boundary (Kearny) (3.0 miles @ 50 mph):	3.6
Total	<u>31.5</u>
2B. Starting point #2 to I-78 (2.01 miles @ 30 mph):	4.0
I-78 to NJ Turnpike Exit 14 (20.25 miles @ 50 mph):	24.3
Exit 14 to Hudson County Boundary (Kearny) (3.0 miles @ 50 mph):	3.6
Total	<u>31.9</u>
3A. Starting point #1 to I-78 (1.78 miles @ 30 mph):	3.6
I-78 to NJ Turnpike Exit 14 (20.25 miles @ 50 mph):	24.3
Straight through Exit 14 to Hudson County Boundary (Bayonne) (2.4 miles @ 50 mph):	2.9
Total	<u>30.8</u>
3B. Starting point #2 to I-78 (2.01 miles @ 30 mph):	4.0
I-78 to NJ Turnpike Exit 14 (20.25 miles @ 50 mph):	24.3
Straight through Exit 14 to Hudson County Boundary (Bayonne) (2.4 miles @ 50 mph):	2.9
Total	<u>31.2</u>

	<u>Minutes</u>
4A. Starting point #1 to I-78 (1.78 miles @ 30 mph):	3.6
I-78 to US 1/9 (20.6 miles @ 50 mph):	24.7
US 1/9 to Exit at Stockton Avenue (.75 miles @ 40 mph):	1.1
Stockton to Wilson to Ferry to Jackson and across 4th St. Bridge to Hudson County Boundary (Harrison) (2.0 miles @ 30 mph):	4.0
Total	<u>33.4</u>
4B. Starting point #2 to I-78 (2.01 miles @ 30 mph):	4.0
I-78 to US 1/9 (20.6 miles @ 50 mph):	24.7
US 1/9 to Exit at Stockton Avenue (.75 miles @ 40 mph):	1.1
Stockton to Wilson to Ferry to Jackson and across 4th St. Bridge to Hudson County Boundary (Harrison) (2.0 miles @ 30 mph):	4.0
Total	<u>33.8</u>