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June 18, 2025

**Via eCourts and Regular Mail**

Hon. Thomas C. Miller, A.J.S.C. (ret.)  
Program Chair  
Affordable Housing Dispute Resolution Program  
Richard J. Hughes Justice Complex  
P.O. Box 037  
Trenton, New Jersey 08625

**Re: In the Matter of the Application of the Borough of Somerville  
SOM-L-106-25  
Declaratory Judgment Action filed pursuant to Directive No. 14-24  
Submission of Housing Element and Fair Share Plan**

Dear Judge Miller:

This office represents the Borough of Somerville (the "Borough") in connection with its participation in the Affordable Housing Dispute Resolution Program (the "Program"). On March 26, 2025, the Court entered an Order fixing the Borough's fair share obligations for the Fourth Round affordable housing cycle. That Order requires the Borough to submit its Housing Element and Fair Share Plan to the Program by June 30, 2025.

Pursuant to N.J.S.A. 52:27D-304.1 et seq., enclosed, please find the Borough's Housing Element and Fair Share Plan, adopted by the Planning Board of the Borough of Somerville (the "Planning Board"), along with a Resolution adopted by the Borough Council of the Borough of Somerville endorsing said plan and approving a draft of the Borough's proposed inclusionary zoning ordinance required to implement the Borough's Fourth Round obligation.

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By submitting its compliance materials prior to June 30, 2025, the Borough respectfully asserts its continued entitlement to immunity from exclusionary zoning litigation in accordance with N.J.S.A. 52:27D-304.1(f)(2)(a).

Enclosed herein, please find the following documents:

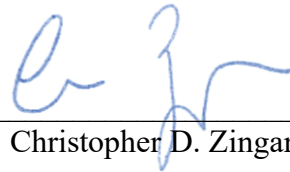
1. Borough of Somerville Housing Element and Fair Share Plan, dated May 19, 2025, which has been submitted in two parts due to eCourts electronic filing size limitations;
2. Resolution of the Planning Board Adopting the 2025 Housing Element and Fair Share Plan; and
3. Resolution No. 25-0616-180 of the Borough Council titled, "Endorsing the Housing Element and Fair Share Plan, Dated May 19, 2025, Approving a Draft Ordinance Implementing the Borough's Inclusionary Zoning Mechanism in Connection with Said Plan, and Authorizing the Submission of Said Plan and Materials to the Affordable Housing Dispute Resolution Program."

Thank you for your attention and courtesies. Please do not hesitate to contact the undersigned with any questions.

Very truly yours,

**RAINONE COUGHLIN MINCHELLO, LLC**

By:



Christopher D. Zingaro, Esq.

Encls. (3)

cc: Borough of Somerville, *via e-mail*  
Fair Share Housing Center, *via e-mail and Certified Mail*