



40 Paterson Street
P.O. Box 480
New Brunswick, NJ 08901
Tel: (732) 545-4717 Fax: (732) 545-4579
www.hoaglandlongo.com

Corrine LaCroix Tighe
Of Counsel
ctighe@hoaglandlongo.com

March 12, 2026

Via eCourts

The Honorable Daniel R. Lindemann, J.S.C.
Union County Superior Court
2 Broad Street
Elizabeth, NJ 07207

Re: In the Matter of the Application of the Township of Scotch Plains
Docket No.: UNN-L-000314-25

Dear Judge Lindemann:

Our office represents the Township of Scotch Plains (the “Township”) in the above-captioned matter. The Township hereby files this letter and attached documents to meet the deadline under the Fair Housing Act, N.J.S.A. 52:27D-304.1(f)(2)(c) and the March 16, 2026 deadlines established in the Consent Order for Conditional Compliance between the Township and Fair Share Housing Center (“FSHC”), which was entered by the Court in this matter on December 15, 2025 (the “Consent Order”).

To that end, please see certified copies of the following Implementing Ordinances and Resolutions on behalf of the Township:

1. Planning Board Resolution Adopting Amended Fourth Round Housing Element and Fair Share Plan;
2. Resolution 2026-65 Endorsing Amended Fourth Round Housing Element and Fair Share Plan;
3. Ordinance 2026-1 Downtown Affordable Housing Overlay Zone – Tier 1;
4. Ordinance 2026-2 Downtown Affordable Housing Overlay Zone – Tier 2;
5. Ordinance 2026-3 Downtown Affordable Housing Overlay Zone – Tier 3;
6. Ordinance 2026-4 Morse Avenue Affordable Housing Overlay Zone;
7. Ordinance 2026-5 B-2 South Avenue Affordable Housing Overlay Zone;
8. Ordinance 2026-7 Affordable Housing Ordinance;
9. Resolution 2026-76 Adopting Spending Plan with copy of plan; and
10. Resolution 2026-77 Adopting Affirmative Marketing Plan with copy of plan.

The Resolutions adopting Home Improvement Manual. Authorizing Affordability Manual and Adopting Administrative Agent Operating Manual will be uploaded under separate cover due to file size.

To date, the Township has worked diligently to implement its Amended Fourth Round Housing Element and Fair Share Plan and all of the corresponding ordinances, resolutions and administrative documents. Should any documentation need to be corrected or amended, the Township will do so timely, in accordance with any instructions from the Court, and in collaboration with FSHC.

I thank Your Honor for your time and attention to this matter.

Respectfully submitted,

Corrine L Tighe /s/
CORRINE LaCROIX TIGHE

cc: Joelle Paull, Fair Share Housing Center (via eCourts)
Michael Mistretta, Township Affordable Housing Planner (via email)
Thomas Strowe, Director of Planning & Community Development (via email)