

SURENIAN, EDWARDS, BUZAK & NOLAN LLC

Jeffrey R. Surenian, Esq. ▲
Email - JRS@Surenian.com

Michael J. Edwards, Esq. ►
Email - MJE@Surenian.com

Edward J. Buzak, Esq. ▼
Email - EJB@Surenian.com

Erik C. Nolan, Esq.
Email - EN@Surenian.com

Also admitted:
◀ CA ▼ DC ▲ PA ■ MA ► NY

A Limited Liability Company
Counselors at Law
311 Broadway, Suite A
Point Pleasant Beach, New Jersey 08742
Phone: (732) 612-3100
Fax: (732) 612-3101
www.Surenian.com

—
North Jersey location:
150 River Road, Suite N-4
Montville, NJ 07045
Phone: (973) 335-0600
Fax: (973) 335-1145

Keli L. Gallo, Esq. ►
Email - KLG@Surenian.com
Susan L. Crawford, Esq. ▲■
Email - SLC@Surenian.com
Nancy L. Holm, Esq. ▲
Email - NLH@Surenian.com
Jacquelin P. Gioioso, Esq.
Email - JPG@Surenian.com
William E. Olson, Esq.
Email - WEO@Surenian.com

March 6, 2026

Via eCourts

Honorable Daniel R. Lindemann, J.S.C.
Union County Courthouse
2 Broad Street, 4th Floor Rotunda
Elizabeth, NJ 07207

**RE: In the Matter of the Application of the City of Summit
Docket No. UNN-L-310-25**

Dear Judge Lindemann:

As the Court is aware, this office represents the City of Summit with regard to affordable housing matters. In accordance with the Court's February 12, 2026 Order accepting the Recommendation of Program Judge Thomas I. Miller, A.J.S.C. (ret.), the terms of the City's Mediation Agreements with challengers Fair Share Housing Center ("FSHC") and Russo Development Corporation ("Russo"), the City of Summit hereby submits the following implementation documents, as required by the amended Fair Housing Act, N.J.S.A. 52:27D-304.1(f)(2)(c), to be submitted by March 15 of the relevant compliance year:

1. The City's Adopted, Amended Fourth Round Housing Element and Fair Share Plan ("HEFSP"), including Appendix;
2. Planning Board Resolution Adopting the Amended Fourth Round HEFSP;
3. Council Resolution ID No. 41955, Endorsing the Amended Fourth Round HEFSP;
4. Ordinance No. 26-3369, Amending the City's Affordable Housing Overlay Zones and corresponding Planning Board Consistency Resolution;

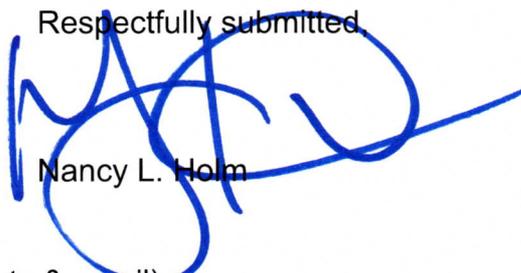
5. Ordinance No. 26-3372, Rezoning 190 River Road (Russo's Proposed Project) and 180 River Road for respective inclusionary development and corresponding Planning Board Consistency Resolution;
6. Ordinance No. 26-3371, Rezoning for the BCUW 100% affordable senior project and corresponding Planning Board Consistency Resolution;
7. Ordinance No. 26-3370, Rezoning for the Harmen Holdings inclusionary project and corresponding Planning Board Consistency Resolution;
8. Ordinance No. 26-3373, Rezoning for Franklin Place inclusionary zoning and corresponding Planning Board Consistency Resolution;
9. Ordinance No. 26-3367, Adopting an Abandoned Properties Ordinance;
10. Ordinance No. 26-3368, Repealing and Replacing the City's Affordable Housing Ordinance, Mandatory Set-Aside Ordinance, and Development Fee Ordinance to conform to new affordable housing regulations and corresponding Planning Board Consistency Resolution;
11. Resolution ID No. 41959, Authorizing the Mayor to sign the First Amendment to the City's Mediation Agreement with Russo and fully executed agreement to ensure that the deadlines in the City's FSHC and Russo agreements are consistent with regard to the transfer of the Shunpike property;
12. Resolution ID No. 41961, Authorizing the Mayor to sign the Agreement with the Summit Housing Authority, which will be fully executed at the SHA's special meeting, which is expected to be held on March 11, 2026, according to the SHA. The City will upload the fully executed agreement on eCourts as soon as possible after the SHA's Special Meeting;
13. Resolution ID No. 41960, Authorizing the Mayor to sign the Agreement with Our House and corresponding fully-executed agreement
14. Resolution ID No. 41956, Adopting the City's Administrative Agent's Operating Manual, which includes the City's affordability assistance program;
15. Resolution ID No. 41958, Adopting the City's Affirmative Marketing Plan
16. Resolution ID No. 41957, Adopting the City's Amended Spending Plan
17. Resolution ID No. 41816, Authorizing the Mayor to sign the Harmen Holding Developer's Agreement, dated November 17, 2025, and corresponding fully-executed agreement;
18. Resolution ID No. 41662, Authorizing the Mayor to sign a Memorandum of Understanding with BCUW for 100% affordable project, dated July 1, 2025 and corresponding fully executed MOU;

19. Resolution ID No. 41521, Appointing Augusto Dal'Maso as Municipal Housing Liaison, dated March 4, 2025;
20. Current Administrative Agent contract with Leckington Associates;
21. Most Current Union County Home Improvement Program Information and Application; and
22. 2019 Third Round Final Judgment of Compliance and Repose, prior Conditional Judgments of Compliance and Repose, and Fairness Order under Docket No. UNN-L-2440-15.

The City has worked tirelessly to implement its Amended Fourth Round HEFSP and all of the corresponding ordinances, agreements, and administrative documents. Should any documentation need to be corrected or amended, the City will do so timely, in accordance with the instructions of the Court, Special Adjudicator, and in collaboration with FSHC and Russo. With regard to deadlines that extend beyond the March 15 statutory deadline, the City will continue to comply with those deadlines in accordance with the terms of its Mediation Agreements.

The City reiterates its sincere appreciation to Judge Miller, Special Adjudicator Cofone, FSHC, and Russo for working together with Summit to come to agreements in an extremely short timeframe, and looks forward to finalizing its Fourth Round compliance with the Court in the coming months.

Respectfully submitted,



Nancy L. Holm

cc: Christine Cofone, PP, AICP (via eCourts & email)
All attorneys of record (via eCourts)
Mayor & Common Council, City of Summit (via email)
Tammie Baldwin, City Administrator (via email)
Augusto Dal'Maso, Municipal Housing Liaison (via email)
Burgis Associates (via email)