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March 12, 2026

Via eCourts

Honorable William G. Mennen, J.S.C.  
Somerset County Courthouse  
20 N. Bridge Street, PO Box 3000  
Somerville, NJ 08876  
Ph. 908-322-7700, Ext. 13630

Re: I/M/O the Application of the Township of Greenwich, Docket No. WRN-L-26-25  
**TRANSMITTAL OF IMPLEMENTING ORDINANCES AND  
RESOLUTIONS**

Dear Judge Mennen:

I represent the Township of Greenwich (the “Township”) which is subject to an order entered by your Honor on March 5, 2026 which, while dismissing challenges filed by Dowell Realty Associates, LLC and Lamplight RE, ordered that the challenge filed by Fair Share Housing Center (FSHC) remains open to allow the court to resolve the objections raised therein (largely documentary in nature or largely seeking clarifications), and ordered the parties to independently continue their dialogue and document review with the goal of allowing the Township to present its proofs, documents, and clarifications to FSHC and providing FSHC an opportunity to contest or refute those offerings.

Your Honor’s March 5, 2026 order further provides that the Township “shall follow the procedure set forth in N.J.S.A. 52:27D-304.1(f)(2)(c) and (d), requiring that, on or before March 16, 2026,<sup>1</sup> the Municipality shall (i) adopt and file its proposed amended HEFSP as well as the implementing ordinances and resolutions proposed within the amended HEFSP, which adoption shall be subject to change based on any forthcoming settlement if negotiations remain ongoing as of that date or, in the alternative, (ii) adopt a binding resolution by March 16, 2026 to commit to adopting the implementing ordinances and resolutions required following resolution of the dispute(s)....” While the Township has adopted a binding resolution which accompanies this letter for filing, the Township has also adopted implementing ordinances and resolutions which also accompany this letter for filing.

I emailed FSHC proposed amendments to the June, 2025 adopted HEFSP to incorporate recommended revisions relating to the durational adjustment issue and am waiting to hear back from FSHC as to whether same is acceptable before I present the amendments to the Land Use Board for adoption and the Township Committee for endorsement.

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<sup>1</sup> Citing R. 1:3-1, your Honor noted that the statutory deadline for municipalities to adopt all necessary implementing ordinances and resolutions for non-challenged and challenged HEFSPs, or alternatively, a binding resolution to commit to adopting the implementing ordinances and resolutions following settlement and/or resolution of a Program submitted dispute (with necessary adjustments) was March 15, 2026 but, because the deadline falls on a Sunday, the deadline became Monday, March 16, 2026, as the next day that was neither a Saturday, Sunday, or a legal holiday, and thus adoptions made and confirmed on and as of March 16, 2026, are deemed compliant.

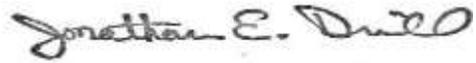
By copy of this letter with the accompanying filings, I ask FSHC to please review the accompanying filings and advise if it believes any of these documents need to be amended.

Finally, I ask FSHC to advise if it believes there are any documents which have not been adopted which need to be adopted.

The following documents accompany this letter and are being submitted for filing via eCourts, all of which are following implementing ordinances and resolutions:

1. Ordinance 103-2026 creating the IRH-1 zone.
2. Ordinance 104-2026 creating the IRH-2 zone.
3. Ordinance 105-2026 creating the IORH-1 zone.
4. Ordinance 106-2026 adopting Affordable Housing regulations and Development Fee regulations.
5. Resolution 37-26 binding the Township to adopt and/or amend any additionally required implementing resolutions and ordinances after the existing dispute is resolved.
6. Resolution 38-26 adopting the Spending Plan.

Respectfully submitted,

A handwritten signature in black ink that reads "Jonathan E. Drill". The signature is written in a cursive style with a prominent initial "J".

JONATHAN E. DRILL

Copies:

All counsel of record via eCourts