### TOWNSHIP OF SOUTH BRUNSWICK



Municipal Building • P.O. Box 190 • Monmouth Junction, NJ 08852-0190

Phone 732-329-4000 TDD 732-329-2017 Fax 732-329-0627

#### Via Email and Regular Mail

January 6, 2016

Honorable Douglas K. Wolfson, J.S.C. Superior Court of New Jersey Middlesex County Courthouse 56 Paterson Street P.O. Box 964 New Brunswick, NJ 08903-0964

Re: In the Matter of the Application of the Township of South Brunswick

Docket No. MID-L-3878-15

Our File No. L1347

#### Dear Judge Wolfson:

Pursuant to the Court's order of November 16, 2015, I submitted on December 18, 2015, revisions to the Township's preliminary Third Round Plan. The December 18 revised plan continued to utilize the 2014 COAH obligation numbers for South Brunswick. The Plan and the cover letter accompanying same alerted the court to the fact that the Township was reserving the right to revise its Third Round Housing Element and Fair Share Plan based upon the anticipated report from Econsult regarding statewide, regional and municipal obligations.

By my letter of January 4, 2016, I transmitted a copy of the Econsult Solutions report dated December 30, 2015, to the court, Special Master Coffone and all parties in this matter. This report indicates that the Township's obligations are as follows:

Prior Obligation (1987-1999): 842 (which has been fully satisfied)
 Present Need (1999-2015): 130 (representing rehabilitation units)

• Prospective Need (2015-2025): 215 (new units required)

The Township continues to remain committed to voluntary compliance with its constitutional obligation to provide realistic opportunities for affordable housing. Given these revisions to the Township's Third Round Prospective obligation, the Township hereby submits the enclosed revised Plan based upon the obligations contained in the Econsult report. The enclosed revision is submitted without prejudice, the Township reserving all rights it has to amend same should the need arise as this matter progresses.

# TOWNSHIP OF SOUTH BRUNSWICK

Municipal Building • P.O. Box 190 • Monmouth Junction, NJ 08852-0190

Thank you for your considerations in this matter. If you have any questions or comments, please do not hesitate to contact me.

Respectfully submitted,

## s/Donald J. Sears

Donald J. Sears Director of Law

DJS/lw

Cc: Robert A. Kasuba, Esq., attorney for AVB
Henry Kent-Smith, Esq., attorney for Richardson
Kenneth D. McPherson, Jr., attorney for SBC
Kevin J. Moore, Esq., attorney for SG
Kevin Walsh, Esq., and Adam Gordon, Esq., attorneys for FSHC
Brett Tanzman, Esq., attorney for Windsor
Benjamin Bucca, Jr., Esq., attorney for SB Planning Board
Christine Nazzaro-Cofone, PP, Special Master