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December 22, 2021

Hon. Gregg A. Padovano, J.S.C.  
Bergen County Courthouse, Chambers 331  
10 Main Street  
Hackensack, NJ 07601

Re: In re Borough of Saddle River Third Round Mount Laurel  
Affordable Housing Obligation, Docket No. BER-L-6120-15  
Submission of Compliance Documents 44 and 45

Dear Judge Padovano:

As you are aware, I represent the Borough of Saddle River (the "Borough") in the above matter in which your Honor is in the process of conducting a combined fairness and compliance hearing which will resume on December 28, 2021. I am now submitting via eCourts the following compliance documents which implement the Second Amendment to the Settlement Agreement, and which I will arrange to have uploaded to the Borough's website:

44. Ordinance 21-1024 adopted on December 20, 2021 repealing Ordinance 21-1006 and Affordable Housing Zoning District 4 (the "AH-4 zone") and restoring Block 1703, Lot 15 (the so-called "Woodcliff Lake Road site") to its prior R-1 zoning; and
45. Ordinance 21-1025 adopted on December 20, 2021, expanding the Affordable Housing Zoning District 3 (the "AH-3 zone") to include Block 1609, Lot 9 (25 E. Allendale Road) and to include the Choctaw Trail right-of-way to accommodate the 100% affordable housing development which will be constructed by The Michaels Organization ("TMO"), and to expand the principal permitted uses to allow special needs housing on Block 1605, Lot 1 (20 E. Allendale Road) and up to three special needs housing units in TMO's development.

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I intend to move the above documents into evidence as exhibits P-54 and P-55 at the commencement of the continued hearing in this matter on the basis of judicial notice pursuant to N.J.R.E. 201(a) and (d) as these documents are ordinances adopted by a governmental entity.

Additionally, by letter dated April 29, 2021 I submitted the following document but I neglected to move it into evidence thereafter as exhibit P-47 so, for completeness of the record, I will move it into evidence at the commencement of the continued hearing as exhibit P-47:

37. Ordinance 21-1006 adopted on April 19, 2021 creating the AH-4 zone for the 78 Woodcliff Lake Road site. (To be clear, this ordinance was repealed by the Borough last night by the adoption of Ordinance 21-1024 and the only reason I will move it into evidence is for purposes of making the record complete).

By copy of this letter, I will be providing special master Banisch and all counsel who are participating in the combined fairness and compliance hearing with a filed copy of this letter and filed copies of compliance documents #44 and #45.

Respectfully submitted,

STICKEL, KOENIG, SULLIVAN & DRILL, LLC



By: JONATHAN E. DRILL

Copy w/ enclosures via email:

Frank Banisch, III, PP, AICP (special master)  
Adam M. Gordon, Esq. (Attorney for Intervening Defendant FSHC)  
Joshua Bauers, Esq. (Attorney for Intervening Defendant FSHC)  
Eric M. Bernstein, Esq. (Attorney for Intervening Defendant SRI)  
Joshua Zielinski, Esq. (Attorney for SR Residents - NJ, objecting to the SRI sites)  
Robert Simon, Esq. (Attorney for Galitis objecting to SR Residents)

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**Wendy Rubenstein, Esq. (Attorney for Zhanna Torres, objecting to the  
78 Woodcliff Lake Road site)**

**John L. Schettino, Esq. (Attorney for Borough of Woodcliff  
Lake, objecting to the 78 Woodcliff Lake Road site, and Intervening  
Defendant as to the issue of providing access to Woodcliff Lake's  
sewer and water resources)**

**Richard S. Mazaway, Esq. (Attorney for the Silvers and the  
Rodriguez's, objecting to the 78 Woodcliff Lake Road site)**

**Steven G. Sanders, Esq. (representing himself and his wife pro se)**

**Copy w/enclosures to all other counsel of record via eCourts**