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# Housing Plan Element and Fair Share Plan

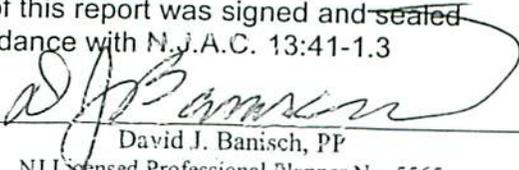
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Township of Independence  
Warren County, New Jersey

Adopted: June 7, 2010

*Prepared by*  
***Independence Township Land Use Board***  
in consultation with Banisch Associates, Inc.  
111 Main Street, Flemington, NJ 08822

The original of this report was signed and sealed  
in accordance with N.J.A.C. 13:41-1.3

  
\_\_\_\_\_  
David J. Banisch, PP  
NJ Licensed Professional Planner No. 5565

*June 8, 2010*  
\_\_\_\_\_  
Date Signed

**FINDINGS OF FACT, CONCLUSIONS AND RESOLUTION**  
**REGARDING THE HOUSING ELEMENT AND FAIR SHARE PLAN OF THE**  
**INDEPENDENCE TOWNSHIP MASTER PLAN**

The Planning Board of the Township of Independence, in the County of Warren and State of New Jersey, upon motion duly made and seconded, adopts the following findings of fact, conclusions and resolution:

**FINDINGS OF FACT:**

1. The Independence Township Master Plan, as adopted pursuant to The Municipal Land Use Law, N.J.S.A. 40:55D-1, et seq., was the subject of a complete re-examination, resulting in the adoption of a Resolution regarding same dated March 18, 2002. Thereafter, and as memorialized in a Resolution dated May 19, 2003, the Independence Township Planning Board adopted an Amendment to the Re-Examination, addressing and recommending a change in the zoning designation of several parcels of property within the Township. By Resolution dated October 17, 2005, the Independence Township Planning Board adopted a Stormwater Management Element to the Master Plan. On November 21, 2006, the Independence Township Planning Board adopted a Housing Element and Fair Share Plan as memorialized in a Resolution adopted on January 16, 2006.

2. The Independence Township Planning Board, in compliance with the requirements of the Municipal Land Use Law and the Fair Housing Act of 1985, has determined that a revised Housing Element, recalculating the prior round obligation for the 1987 -1999 period and identifying a Third Round rehabilitative share and a Third Round growth share for the 2004-2018 period is appropriate.

3. Pursuant to N.J.S. 40:55D-28.b.(3), a Housing Element pursuant to N.J.S. 52:27D-310 is an integral part of a Master Plan for the Township. N.J.A.C 5:97-2.1(a) requires the adoption of the Housing Plan Element by the Planning Board and endorsement by the Township Committee

4. The Independence Township Planning Board has carefully studied and discussed the various relevant factors relating to the Housing Plan Element and Fair Share Plan of the Master Plan as set forth in various drafts, including a draft dated May, 2010, for public hearing purposes, and has had the benefit of instructive explanations of the proposed changes to the Plans.

5. Public notice was given of the hearing on the adoption of the Housing Element and Fair Share Plan in accordance with N.J.S. 40:55D-13 by publication and by notice to the clerk of every adjoining municipality and to the Warren County Planning Board at least ten (10) days prior to the date of such hearing.

6. The Independence Township Planning Board conducted a hearing, after acquiring jurisdiction by such notice and publication as aforesaid, on the adoption of the Housing Plan Element and Fair Share Plan, and has determined that the said Housing Plan Element and Fair Share Plan are consistent with the goals and objectives of the Independence Township 1995 and 2000 updates and the March, 2002 Re-Examination Report, and the amendments and supplements thereto, and that the adoption and implementation of the same is in the public interest and protects public health and safety and promotes the general welfare and satisfies the mandatory contents and required criteria as set forth in N.J.S. 52:27D-310 and the third round substantive rules of the Council On Affordable Housing.

7. The Fair Share Plan appropriately sets forth a plan as to how the Township of Independence proposes to address its required provision of low and moderate income housing needs in accordance with the statutes and Rules as applicable.

**CONCLUSIONS:**

1. The Planning Board of the Township of Independence has prepared and adopted and by this resolution does memorialize such preparation and adoption of a Housing Plan Element and Fair Share Plan, and desires to recommend to the municipality that the Fair Share Plan be approved by the Township Committee of Independence Township and forwarded to the Council On Affordable Housing for review, comment, recommendation and substantive certification by the said Council On Affordable Housing in accordance with law and the Rules and Regulations promulgated thereunder, and that the Housing Plan Element and Fair Share Plan be forwarded to the Warren County Planning Board and to all others entitled to notice of the adoption hereof.

**RESOLUTION:**

**RESOLVED**, that the Housing Plan Element and Fair Share Plan dated May, 2010, be and it is hereby approved and adopted as consistent and in furtherance of the goals and objectives of the Township of Independence Master Plan, and that the Housing Plan Element and Fair Share Plan be and is hereby adopted with a recommendation that same be approved by the Township Committee of Independence Township and forwarded to the Council On Affordable Housing for review, comment, recommendation and substantive certification by the said Council On Affordable Housing in accordance with law, and that the Housing Plan Element and Fair Share Plan be forwarded to the Warren County Planning Board and to all others entitled to notice of the adoption hereof.

**BE IT FURTHER RESOLVED** that a copy of this resolution, as well as the Housing Plan Element and Fair Share Plan shall be sent to the Warren County Planning Board and to the municipal clerk of each adjoining municipality in accordance with law

The foregoing resolution was duly adopted at a meeting of the Independence Township Planning Board conducted on June 7, 2010, memorializing formal action taken by the Independence Township Planning Board on June 7, 2010.

  
\_\_\_\_\_  
Alfia Schemm, Administrator  
Independence Township Planning Board

RESOLUTION NO. 34-2010

**RESOLUTION OF THE INDEPENDENCE TOWNSHIP COMMITTEE ENDORSING THE 2010 HOUSING PLAN ELEMENT AND FAIR SHARE PLAN AND PETITIONING THE NEW JERSEY COUNCIL ON AFFORDABLE HOUSING FOR THIRD ROUND SUBSTANTIVE CERTIFICATION**

**WHEREAS**, the Land Use Board of Independence Township, Warren County, State of New Jersey adopted the Independence Township 2010 Housing Plan Element and Fair Share Plan of the Master Plan on June 7, 2010; and

**WHEREAS**, a true copy of the resolution of the Land Use Board adopting the Housing Plan Element and Fair Share Plan is attached pursuant to N.J.A.C. 5:95-2.2(a)2; and

**NOW THEREFORE BE IT RESOLVED** that, pursuant to N.J.A.C. 5:96-2.2, the Independence Township Committee, hereby endorses the Housing Plan Element and Fair Share Plan as adopted by the Independence Township Land Use Board; and

**BE IT FURTHER RESOLVED** that the Independence Township Committee, pursuant to the provisions of N.J.S.A. 52:27D-301 et seq. and N.J.A.C. 5:96-3.2, submits this petition for substantive certification of the Housing Plan Element and Fair Share Plan to the Council on Affordable Housing for review and certification; and

**BE IT FURTHER RESOLVED** that notice of this petition for substantive certification shall be published in a newspaper of countywide circulation pursuant to N.J.A.C. 5:96-3.5 within seven days of issuance of the notification letter from the Council on Affordable Housing's Executive Director indicating that the submission is complete and that a copy of this resolution, the adopted Housing Plan Element and Fair Share Plan and all supporting documentation shall be made available for public inspection at the Independence Township Clerk's office, located at 286 Route 46 West, Great Meadows, New Jersey 07838 during the hours of 7:30am to 5:00pm, Monday through ~~Friday~~ for a period of 45 days following the date of publication of the legal notice pursuant to N.J.A.C. 5:96-3.5.

*Thursday*

I herein certify that the foregoing resolution is a true and correct copy of the resolution that was duly adopted by the Township Committee of the Township of Independence, County of Warren, State of New Jersey at a regular meeting held on June 7, 2010.

*Deborah H. Hrebenak*  
Deborah Hrebenak, CMC, Independence Township Clerk

Date:

*6.7.2010*

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# Housing Plan Element and Fair Share Plan

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Township of Independence  
Warren County, New Jersey

DRAFT  
May 2010

*Prepared by*  
***Independence Township Land Use Board***  
in consultation with Banisch Associates, Inc.  
111 Main Street, Flemington, NJ 08822

The original of this report was signed and sealed  
in accordance with N.J.A.C. 13:41-1.3

## Introduction

This is Independence Township's amended Third Round Housing Plan Element (HPE) and Fair Share Plan (FSP). On November 21, 2005, Independence adopted its original Third Round Plan. The 1995 Housing Plan Element and Fair Share Plan based the Township's full obligation under the fact that there was a lack of land in the Township that was affordable, approval and developable. The rationale at the time was (1) the idea that the Township lacked water and sewer and (2) the State Development and Redevelopment Plan designated the area as PA4B Rural/Environmentally Sensitive Planning Area and PA5 Environmentally Sensitive Planning Area<sup>1</sup>.

In January 2007, the NJ Appellate Division overturned COAH's substantive rules because of a challenge and suspended any further COAH substantive certifications of municipal Third Round Plans. The Court ordered COAH to revise its rules, which were then adopted in September 2008 becoming effective on October 20, 2008. As a result, in order for the 562 municipalities that were not certified prior to the January 2007 Appellate Division ruling to remain under COAH's protection from "builder's remedy" lawsuits, municipalities must repetition COAH.

This Plan responds to Independence Township's affordable housing obligation, as it is now constituted under COAH's revised 2008 Third Round rules. While COAH's initial Third Round rules identified affordable housing obligations for the period 2004-2014, the revised rules extended the Third Round affordable housing compliance period by four years through 2018. The revised rules continue to rely upon a 'growth share' methodology, albeit with a substantially more aggressive set-aside formula than the original growth share requirement. Under growth share rules, Third Round new construction affordable housing obligations result from any development that receives a certificate of occupancy between January 1, 2004 and December 31, 2018.

COAH's revised Third Round rules address affordable housing obligations dating back to 1987 and identify three components of municipal affordable housing need, including

- (1) "Recalculated" prior round obligation for the 1987-1999 period,
- (2) Third Round rehabilitation share, and
- (3) Third Round growth share obligation for the 2004-2018 period.

This amended Housing Plan Element addresses these three components of affordable housing need, which in Independence Township include:

- (1) COAH recalculated "prior round" affordable housing obligation of 10 units,
- (2) Rehabilitation obligation of 19 units, and
- (3) "Growth Share" obligation consisting of 52 affordable units according to COAH,

This Housing Element and Fair Share Plan details Independence Township's plan to address the full 81 unit cumulative COAH obligation.

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<sup>1</sup> Former rules for Round Three required affordable housing in Centers in PA4B or PA5.

## COAH and Statutory Affordable Housing Requirements

This Amended Housing Plan Element has been prepared in accordance with the Municipal Land Use Law (N.J.S.A. 40:55D-28b (3)) and the Fair Housing Act (N.J.S.A. 52:27D-310), to address Independence Township's cumulative housing obligation for the period 1987- 2018. N.J.S.A. 52:27D-310 outlines the mandatory requirements for a Housing Plan Element. This plan also responds to the affordable housing mandates of the Third Round Substantive Rules of the Council on Affordable Housing (N.J.A.C. 5:97-1 et seq.).

At N.J.S.A. 40:55D-28.b(3), the Municipal Land Use Law identifies the following requirements for a Housing Plan Element:

(3) A housing plan element pursuant to section 10 of P.L.1985, c.222 (C.52:27D-310), including, but not limited to, *residential standards and proposals for the construction and improvement of housing*;

The COAH rule standard for the *Content of a Housing Element* (N.J.A.C. 5:97-2.3 a) also requires that a Housing Element submitted to the Council for certification include the minimum requirements prescribed by N.J.S.A 52:27D-310 which provides that

*“a municipal housing element shall be designed to achieve the goal of access to affordable housing to meet present and prospective housing needs, with particular attention to low and moderate income housing, and shall contain at least:*

*a. An inventory of the municipality's housing stock by age, condition, purchase or rental value, occupancy characteristics, and type, including the number of units affordable to low and moderate income households and substandard housing capable of being rehabilitated, and in conducting this inventory the municipality shall have access, on a confidential basis for the sole purpose of conducting the inventory, to all necessary property tax assessment records and information in the assessor's office, including but not limited to the property record cards;*

*b. A projection of the municipality's housing stock, including the probable future construction of low and moderate income housing, for the next ten years, taking into account, but not necessarily limited to, construction permits issued, approvals of applications for development and probable residential development of lands;*

*c. An analysis of the municipality's demographic characteristics, including but not necessarily limited to, household size, income level and age;*

*d. An analysis of the existing and probable future employment characteristics of the municipality;*

*e. A determination of the municipality's present and prospective fair share for low and moderate income housing and its capacity to accommodate its present and prospective housing needs, including its fair share for low and moderate income housing; and*

*f. A consideration of the lands that are most appropriate for construction of low and moderate income housing and of the existing structures most appropriate for conversion to, or rehabilitation for, low and moderate income housing, including a consideration of lands of developers who have expressed a commitment to provide low and moderate income housing.”*

## Addressing the Statutory Requirements

*N.J.S.A 52:27D-310.a. An inventory of the municipality's housing stock...*

Appendix A responds to subsection 1.a. above.

*N.J.S.A 52:27D-310.b. A projection of the municipality's housing stock...*

From 2000 through 2009, Independence Township has seen considerable residential development, issuing 141 certificates of occupancy during the 10-year period. This growth was at its highest in 2000 with 41 units and has steadily declined since then. Much of this can be attributed to the adoption of the Highlands rules and RMP, the lack of sewer and water and more recently the Great Recession and severe downturn in the economy. The years 2000-2002 saw an average of 31 certificates of occupancy per year. However, there has been an average of 7.8 certificates of occupancy per year for the period 2003-2009 as a run-up to RMP adoption.

**Table 1**  
**Independence Township's Residential Growth 1/1/2000- 12/31/2009**

Year	Residential CO's
2000	41
2001	30
2002	22
2003	7
2004	12
2005	13
2006	3
2007	7
2008	3
2009	3
<b>TOTAL</b>	<b>141</b>

Source: NJ Department of Community Affairs

If a similar slow rate of growth (7.8 new CO's/year) continues for the 2010-2018 portion of the current COAH cycle, another 70.2 units would be built. This figure is much lower than COAH's projection for Independence Township, which identified an estimated 259 residential units for the 2004 – 2018 time period comprising COAH's third round.

Actual third round growth share – A total of 41 certificates of occupancy for residential development were issued in Independence Township after January 1, 2004 through 2009. this results in a COAH growth share requirement of 10.25 affordable housing units.

Year	Residential CO's
2004	12
2005	13
2006	3
2007	7
2008	3
2009	3
<b>TOTAL</b>	<b>41</b>

Post January 1, 2004 residential development indicates a growth rate of 6.8 units per year. Growth is expected to be anemic for the duration of the third round at the current pace of development, particularly in view of existing economic conditions, which suggest very low levels of growth throughout the region in the next several years to come.

*N.J.S.A 52:27D-310.c. An analysis of the municipality's demographic characteristics...*

Appendix A responds to subsection 1.c.

*N.J.S.A 52:27D-310.d. An analysis of the existing and probable future employment characteristics of the municipality;*

Appendix A documents the employment characteristics as detailed in the 2000 Census. Table 2 identifies actual non-residential growth within the Township since 2000.

**Table 2: Non-Residential Actual Growth by Use Group, 2000-2009**

Sq.ft./ affordable unit	Office		Multi-Family		A--3		Storage		TOTALS	
	5,714		-		10,000		16,000		Sq. Ft.	Non-Res Obligation
	Sq.ft. of CO issued	# affordable units	Sq.ft. of CO issued	# affordable units	Sq.ft. of CO issued	# affordable units	Sq.ft. of CO issued	# affordable units		
<b>2000</b>	0	0	7,497	0	0	0	5,500	0.3	12,007	0.3
<b>2001</b>	0	0	3,024	0	0	0	5,500	0.3	8,524	0.3
<b>2002</b>	0	0	0	0	0	0	0	0	0	0.00
<b>2003</b>	10,775	1.9	396	0	0	0	80,326	5.00	91,497	6.90
<b>2004</b>	0	0	0	0	216	0.02	0	0	216	0.02
<b>2005</b>	0	0	0	0	216	0.02	0	0	216	0.02
<b>2006</b>	4,800	0.8	0	0	0	0	0	0	4,800	0.80
<b>2007</b>	0	0	0	0	0	0	0	0	0	0.00
<b>2008</b>	0	0	0	0	0	0	0	0	0	0.00
<b>2009</b>	0	0	0	0	0	0	0	0	0	0.00
<b>Totals</b>	<b>15,575</b>	<b>2.7</b>	<b>10,917</b>	<b>0</b>	<b>432</b>	<b>0.04</b>	<b>91,326</b>	<b>5.6</b>	<b>118,250</b>	<b>8.34</b>

The Township experienced a total of 118,250 square feet of non-residential development since 2000, however, only 107,333 square feet contributed to the nonresidential growth share affordable housing requirement of production. Since 2000, an obligation for 8.34 affordable units was generated from non-residential development. This figure results in 0.8 affordable units/year, but during the past six years the Township has seen significantly slower non-residential development than it did in the period 2000-2003.

For 2004-2009, there was a total nonresidential growth share obligation of .84 affordable units generated, which is 0.14 affordable units/year. If this rate of nonresidential growth is projected to 2018 a total of 1.26 additional units of obligation would be generated. Under COAH's jobs formula this is , which would result in approximately 34 jobs for the entire third round. COAH's estimate for employment growth in Independence Township is a loss of 43 jobs for the 2004 through 1018 third round.

***N.J.S.A 52:27D-310.e. A determination of the municipality's present and prospective fair share for low and moderate income housing...***

For COAH's third round, the present and prospective fair share is comprised of three components of need, as follows:

- (1) Recalculated prior round obligation (10 units);
- (2) Third round rehabilitation obligation (19 units); and
- (3) Third round growth share (52.8 or 52 units).

Independence Township has a rehabilitation obligation under the Third Round rules of 19 units, which represents its present need, which is addressed in this Housing Plan Element and Fair Share Plan. The other two components of need include the recalculated prior round need and the third round growth share, which are also addressed in this Plan. As noted above, this includes the recalculated prior round obligation of 10 units and the third round growth share of 52 units. This represents a net ***39-unit increase over Independence Township's original Third Round growth share affordable housing obligation of 12.6 affordable units according to the Chapter 94 methodology***, which formed the basis for the Housing Element and Fair Share Plan in 2005. COAH's Chapter 97, the regulations now in effect, assigned Independence Township a four-fold increase in its growth share based upon growth estimates for the Township, which are not expected to come to fruition based upon current economic circumstances and a depressed residential market.

**Table 3  
Independence Township's Actual Growth 1/1/2004- 12/31/2009**

<b>Year</b>	<b>Res. CO's</b>	<b>Affordable Units from Housing</b>	<b>Non-Residential Square feet</b>	<b>Affordable Units from Non-Res.</b>	<b>Total Affordable Units</b>
2004	12	3	216	0.02	3.02
2005	13	3.25	216	0.02	3.27
2006	3	0.75	0	0	0.75

2007	7	1.75	0	0	1.75
2008	3	0.75	0	0	0.75
2009	3	0.75	4800	0.84	1.59
<b>TOTAL</b>	<b>41</b>	<b>10.25</b>	<b>5,232</b>	<b>0.88</b>	<b>11.13</b>

Considering the **0.88** affordable unit obligations (non-residential) with the **10.25** affordable unit obligation (residential) yields **11.13** affordable units “owed” by Independence Township based on growth that occurred between January 1, 2004 December 31, 2009. Independence Township’s 11.13-unit growth share during the past 6 years equates to an obligation of 1.85 affordable units/year or approximately 26 units of affordable housing attributable to growth share for the 18-year third round. The several versions of the Third Round COAH rules have provided wildly differing estimates of the Township’s growth share obligation, as seen in Table 4 below.

Under the COAH rule as adopted, Independence Township has a growth share obligation of 52 units for the period between January 1, 2004 and December 31, 2018. For this forecast to be correct, between January 1, 2010 and December 31, 2018 Independence Township would have to incur an additional 40 units of new growth share obligation or slightly over 4 affordable units each year. *This yearly total is far greater than the 6-year total* affordable obligation of slightly two units a year for Third Round period (since January 1, 2004).

***N.J.S.A 52:27D-310.f. A consideration of the lands and of the existing structures that is most appropriate for construction of conversion to, or rehabilitation for low and moderate income housing...***

Independence Township is a Highlands municipality with land within the Planning Area and Preservation Area. The Township has identified the Planning Area portion of the municipality as the area of the Township most likely to be successful in affordable housing production under an inclusionary development overlay zoning ordinance. Independence Township will implement these standards in both the Planning Area and Preservation Areas of the Township in order that applications for new residential development consisting of at least four (4) market rate units will be required to provide their fair share of affordable housing under COAH’s third round regulations.

### **Independence Township’s Affordable Housing Production**

#### **Rehabilitation Share**

According to Appendix B of N.J.A.C. 5:97, Independence Township’s rehabilitation share is 19 units. This determination is based on overcrowded units constructed before 1950, units with incomplete kitchens, incomplete plumbing, and the estimated number of low and moderate- income households in the municipality. Table 4 provides the results of the calculation.

**Table 4**

**Calculation of the Rehabilitation Obligation**

Overcrowding of units constructed prior to 1950	7
Incomplete plumbing facilities	+12
Incomplete kitchen facilities	+7
Low and moderate income share	0.714
Rehabilitation share credit	0
<i>Rehabilitation Obligation</i>	<i>19 units</i>

Source: Appendix B to *N.J.A.C. 5:97*

The Township is reviewing three options to address its obligation. The options include:

1. In Warren County, the Department of Human Services oversees the Warren County Housing Program Home Improvement/ Rehab, which may administer a program for the Township.
2. Another option under consideration is contracting with another municipality such as Philipsburg Housing Improvement Program, which works in coordination with the County.
3. A third option is permitting ECHO units which are modular, self-contained units erected on sites containing an existing dwelling, which can address a municipality’s rehabilitation share. This option may only address a portion of the obligation so in may be adopted in concert with one of the other options.

**Fair Share Plan**

**Recalculated Prior Round**

In this Plan, Independence Township proposes to address its recalculated prior round obligation of 10 units; plus its actual third round growth share obligation of 11 units through essentially two mechanisms authorized in COAH’s rules for affordable housing production. These include the (1) market-to-affordable provisions in the regulations and (2) supportive and special needs housing. Independence Township’s affordable housing trust fund balance is very limited as of May, 2010. The affordable housing mechanisms identified to address the recalculated prior round obligation and the actual third round obligation will require a local funding commitment for implementation.

1. Market-to-affordable - Independence Township has identified the market-to-affordable mechanism as found at (N.J.A.C. 5:97-6.9). – The Township seeks to minimize the tax burden for affordable housing production through the market-to-affordable program by purchasing or subsidizing single-family units to convert to two- or more family buildings to be sold / and or rented as affordable units. The Township will seek to partner with either non-profit or for-profit developers to convert existing market-rate housing stock to affordable units. The minimum subsidy required on a market-to-affordable unit is \$25,000 for a moderate income unit and \$30,000 for a low-income unit. Private for-profit developer partnerships

seem most likely, as there has been some interest expressed in market to affordable conversions by the private sector. The Township will seek to fund these partnerships utilizing the market to affordable subsidies identified at N.J.A.C. 5:97-6.9. However additional subsidy may be required dependent on acquisition costs, and physical alterations required for rehabilitation and conversion. The Township plans to produce 12 affordable housing units using this mechanism.

In addition to single- and multi-family conversions, the Township has identified existing rental apartment complexes in the Township as candidates for the market-to-affordable program. These include the Towpath Apartments and Liberty House. Towpath consists of 211 apartments and Liberty House includes 40 apartments.

Market to Affordable Program: **up to 21 units<sup>2</sup>**

2. Supportive and special needs housing – Independence Township will identify a private-non profit agency for the creation of one or more group homes for persons of special needs. These may include congregate lining arrangements for the elderly or developmentally disabled.

Supportive/special needs housing **up to 10 bedrooms**

Tables 5 and 6 identify the Township’s Prior Round and Third Round Compliance mechanisms. The Township fully satisfies the Prior Round COAH obligation of 10 affordable units.

**Table 5**  
**Summary of Independence Township’s Recalculated Prior Round**  
**Affordable Housing Compliance**

	<b>Units Proposed</b>	<b>Bonus</b>
Liberty House (Rental Units )		
Age Restricted	2	.66
Family Units	3	0
<b>Towpath Apartments</b>		
<b>Family Units</b>	<b>5</b>	
<b>Totals</b>	<b>10</b>	<b>.66</b>
<b>Total affordable units and credits</b>	<b>1.66</b>	

### **Third Round Growth Share**

COAH rules permit municipalities to meet Third Round growth share obligations with a combination of techniques, and specify how the growth-share will be satisfied, including:

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<sup>2</sup> Waiver will be requested to exceed maximum allowable by eleven (11) units at the time of of petition for substantive certification.

- at least 25% of growth share must be rental units - Independence Township's rental obligation is 13;
- no more than 50% of the 13-unit rental obligation (6 units) may be met with age-restricted units and special needs housing;
- up to 25% of growth share may be age-restricted units (13);
- Rental bonuses for non-age restricted units only apply after the rental obligation has been met.
- At least 13% of growth share must be provided for affordable to households earning 30% or less of median income (This results in 6.76, which are rounded up to 7).
- 2:1 bonus credits for any rental unit are applicable only to family units or permanent supportive housing units. (Maximum number of credits can exceed rental obligation of 13.)
- 1:25 units of credit for each bedroom in supportive and special needs housing and as in prior round
- 1:33 units of credit for each age-restricted rental unit

**Table 6**  
**Summary of Independence Township's Third Round**  
**Affordable Housing Compliance**

	<b>Units</b>
<b>Third Round Rehabilitation</b>	<b>19</b>
Rehabilitation Program	-10
ECHO Program	-9
<b>Remaining Rehabilitation Obligation</b>	<b>0</b>
<b>Third Round New Construction Obligation</b>	<b>52</b>
Third Round Growth Share	52
<b>Third Round Compliance Mechanisms</b>	<b>(10-unit actual)</b>
Towpath Apartments	
Age-restricted	+5
Family rentalMarket-to-Affordable	+10
Subtotal vs. actual growth share:	15 vs. (10)
Special Needs and Supportive Housing	+10
Inclusionary Zoning Overlay Development	+42
Plan Total vs. third round new construction obligation:	67 vs. 52
Actual units as of 6/8/10 to be credited to third round new construction obligation:	0

**Market To Affordable - Towpath Apartments**

Independence Township will seek to create up to 15-units of market-to-affordable housing consisting of five (5) age-restricted units and 10 family rental units at the

Towpath Apartments on County Route 517 in Independence Township. Towpath consists of 211 apartments, which charge market rents that the Township anticipates will be within reason to subsidize for the creation of these units, as indicated in the table below:

Based on conversations with the CFO of Salem Management Company the following table provides the type of units available with rents and rents based on COAH’s rent calculator for Warren County.

<b>Units</b>	<b>1 Bedroom</b>	<b>2 Bedroom</b>	<b>Subsidy</b>
Towpath rents <sup>3</sup>	\$950/month	\$1150/month	
Low Income 35% <sup>4</sup>	\$541/month		\$409/month
Low Income 50% <sup>5</sup>	\$787/month		\$163/month
Moderate Income 60%	\$952/month		(\$2)/month
Low Income 35%		\$648/month	\$502/month
Low Income 50%		\$944/month	\$206/month
Moderate Income <sup>6</sup> 60%		\$1140/month	\$10/month

The difference between the market rents charged by Salem Management and those rents required under COAH’s rules would result in a direct a subsidy for the low-income component of a market to affordable program.

The moderate-income subsidy would be marginal for both the one- and two-bedroom apartments, with just a \$2/month subsidy for a moderate-income one-bedroom unit; and a \$10/month subsidy for two-bedroom apartment under a market to affordable program. It is anticipated that these units will require some form of subsidy to incentivize the designation of market-rate units as affordable units for all three.

Subsidies are expected in the form of a ‘front-end’ lump sum payment for the market to affordable program for all low- and moderate income designations, which will require income controls in the form of deed restrictions on specific units in the development.

**Inclusionary Development (N.J.A.C. 5:97-6.4)**

Independence Township will adopt an inclusionary overlay zoning ordinance the entire Highlands Planning Area portion of the Township, including the R-1/2 - 20,000 sq. ft., R-1 - 1-acre, R-2 – 2-acre, R-3 – 3-acre, R-4 – 4-acre and AR – 10-acre zoning districts. In the Highlands Preservation Area, mandatory DEP rules will apply, except

<sup>3</sup> Rent includes heat, hot water, trash collection

<sup>4</sup> 35% of medium income

<sup>5</sup> 50% of medium income

<sup>6</sup> 60% of medium income

that the mandatory inclusionary zoning will apply to all parcels of land capable of supporting four (4) or more new residential lots, which, under COAH's rules, is the minimum number of lots under which the Township can require the provision of affordable housing in connection with inclusionary zoning. A total of 42-units are proposed to be created under this affordable housing technique, which Independence Township proposes to modify from the strict application of COAH's requirements to conform to NJDEP regulations for non-sewer service areas.

Under a Highlands Plan Conformance scenario, which is not proposed in this Plan, the Township may rely upon Highlands minimum lot size and density requirements. Under no Highlands RMP conformance, the Township will defer to the NJDEP septic densities as indicated under N.J.A.C. 7:15, which are slightly more dense than densities indicated under Highlands nitrate dilution standards (i.e. 2 p.p.m. vs. 1.87 p.p.m for the Conservation Zone). This will result in conflict with COAH's rules which, according to N.J.A.C. 5:97-6.4(b)2.iv., require a density increase that cannot be achieved without violating DEP septic densities.

The Township's overlay zoning ordinance will include incentives including a mandatory clustering or lot size averaging requirement to permit lots as small as 2-acres for affordable units required. Additionally, in accordance with N.J.A.C. 5:97-6.4(b)4., the bulk standards in the ordinance "shall minimally reflect a decrease in lot size and lot width requirements for both affordable and market-rate units in an inclusionary zone to enable the additional number of permitted units to fit on the site without the need for variances. Attached single family housing, clustering and/or lot-size averaging shall be permitted in such inclusionary zones located both within and outside of a sewer service area, as necessary to accommodate the additional number of units." The overlay zoning ordinance shall provide for "reduced setbacks, increased building heights and/or additional stories to accommodate the increased number of units."

The range of base densities under a Plan Conformance scenario will be 9.7-acres to 11.3-acres per unit in the Conservation Zone; and 25.3-acres to 28.8-acres per unit in the Protection Zone. Since there are slightly less stringent nitrate dilution standards required under N.J.A.C. 7:15, permitted densities are expected to indicate an increase of approximately 10% over these densities that are indicated under the Highlands Plan Conformance scenario.

Inclusionary zoning is proposed as an overlay so that the Township is assured that there is at least a 20% affordable housing set aside with every residential development involving four (4) or more units.

### **Development Fee Ordinance**

The Township will continue to rely upon its adopted development fee ordinance for collections to the affordable housing trust fund. Additionally, the Township's overlay zoning ordinance will include provisions for payments in lieu in conformity with N.J.A.C. 5:97-(c)3 and any such payments received will be likewise paid into the

affordable housing trust fund to subsidize the affordable housing activities in this Plan that require municipal subsidy.

### **Summary**

The Township has enacted a development fee ordinance and has a COAH-approved development fee and spending plan, which is in the process of being updated. The Township will use funds from the Housing Trust Fund to fund accessory apartments and municipal sponsored program, and to fund a variety of affordability assistance programs such as down payment assistance to low income purchasers and grants/loans for rental assistance for very low-income households.

As indicated in this Plan, Independence Township has formulated a strategy to address the portion of the Township's *actual* growth share. Actual growth share is primarily related to the retroactive obligation that accrued by virtue of development that has occurred *not as a result of approvals granted following the adoption of the initial or revised third round rules, but primarily as a result of approvals granted prior to COAH's promulgation of its initial growth share methodology in the summer of 2004*. Despite this inherent inequity in COAH's rules and significant environmental constraints imposed on the municipality by the NJDEP regulations and Highlands regional planning rules, Independence Township has endeavored to identify a strategy to fully address its affordable housing obligation.

Independence Township's strategies in this Plan will require modest accommodations from the Council on Affordable Housing to fully implement this plan as proposed. These accommodations include waiving and relaxation of the rigid application of certain limits and requirements in Chapter 97. Nevertheless, Independence Township has identified a plan that will result in the provision of its fair share of affordable housing in accordance with the affordable housing obligation assigned to the Township by the Council on Affordable Housing.

## APPENDIX A

### HOUSING AND DEMOGRAPHIC CHARACTERISTICS

#### Inventory of Municipal Housing Units

The primary source of information for the inventory of the Township's housing stock is the 2000 U.S. Census, with data reflecting conditions in 2000. While the Census data was compiled in 2000, it remains the only source of information that provides the level of detail needed for this analysis.

According to the 2000 Census, the Township had 2,210 housing units, of which 2,146 (97%) were occupied. Table 1 identifies the units in a structure by tenure; as used throughout this Plan Element, "tenure" refers to whether a unit is owner-occupied or renter-occupied. Although the Township consists mainly of one-family, detached dwellings (54%), there are a significant number in attached or multi-family structures. The Township had a lower percentage of renter-occupied units, 21%, compared to 26% in Warren County and 52% in the State.

**Table 1: Units in Structure by Tenure**

Units in Structure	Total Units	Vacant Units	Occupied Units		
			Total	Owner	Renter
1, detached	1,200	25	1,175	1,103	72
1, attached	554	16	538	475	63
2	51	8	43	16	27
3 or 4	72	0	72	6	66
5+	319	25	304	84	220
Other	0	0	0	0	0
Mobile Home	14	0	14	8	6
<b>Total</b>	<b>2210</b>	<b>64</b>	<b>2,146</b>	<b>1,693</b>	<b>453</b>

*Source: 2000 U.S. Census, Summary Tape File 3 (STF-3) Tables QT-H10, DP-4 and QT-H5*

Table 2 indicates the year housing units were built by tenure, while Table 3 compares the Township to Warren County and the State. Independence's housing stock reflects an ongoing development pattern with less than ten percent of the housing stock being built prior to 1940 with continued growth through to 2000. A slight slowing of production occurred between 1940 through 1969. Owner-occupied units follow the same pattern as the year structures were built with a fairly even development pattern with a spike in the 1990's. Renter occupied units were typically built between 1940 and 1989 and prior to 1940. The presence of an older housing stock is one of the factors, which correlates highly with filtering. Filtering is a downward adjustment of housing need, which recognizes that the housing requirements of lower-income groups can be served by

supply additions to the higher-income sections of the housing market. This trend also reflects the historic nature of the Township.

**Table 2: Year Structure Built by Tenure**

Year Built	Total Units	% of Total	Vacant Units	Occupied Units		
				Total	Owner	Renter
1990 – 2000	747	34.8	35	747	747	0
1980 – 1989	400	18.6	3	400	302	98
1970 – 1979	335	15.6	15	335	186	149
1960 – 1969	149	6.9	0	149	100	49
1950 – 1959	141	6.6	0	141	87	54
1940 – 1949	85	4.0	0	85	71	14
Pre-1940	225	10.5	11	225	199	26

Source: 2000 U.S. Census, STF-3 QT-H7 for Township

Table 3 compares the year of construction for all dwelling units in the Township to Hunterdon County and the State. Independence had a larger percentage of units built in the 1970’s than did the County or State and a smaller percentage of units built from 1940 to 1959.

**Table 3: Comparison of Year of Construction for Township, County, and State**

Year Built	%		
	Independence Township	Warren County	New Jersey
1990 – 2000	34.8	11.1	10.5
1980 – 1989	18.6	15.2	12.4
1970 – 1979	15.6	15.7	14
1960 – 1969	6.9	11.8	15.9
1940 – 1959	10.6	16.7	27.1
Pre-1940	10.5	29.5	20.1
Median Year	1972	1973	1962

Source: 2000 U.S. Census, STF-3 DP-4 for Township, County, and State.

The 2000 Census documented household size in occupied housing units by tenure, and the number of bedrooms per unit by tenure; these data are reported in Tables 4 and 5, respectively. Table 4 indicates that renter-occupied units generally housed smaller households, with 73% of renter-occupied units having 2 persons or fewer compared to 51% of owner-occupied units. Table 5 indicates that renter-occupied units generally had fewer bedrooms, with 88.5% having two bedrooms or fewer, compared to 38% of owner-occupied units.

**Table 4: Household Size in Occupied Housing Units by Tenure**

Household Size	Total Units	Owner-occupied Units	Renter-occupied Units
1 person	525	321	204
2 persons	669	541	128
3 persons	356	293	63
4 persons	388	356	32
5 persons	155	137	18
6 persons	33	32	1
7+ persons	20	13	7
Total	2,146	1,693	453

Source: 2000 U.S. Census, STF-3 H-17 for Township.

**Table 5: Number of Bedrooms per Unit by Tenure**

Number of Bedrooms	Total Units	(%)	Vacant Units	Occupied Units		
				Total	Owner	Renter
No bedroom	21	0.1	0	21	0	21
1 bedroom	375	17.0	26	349	101	248
2 bedrooms	687	31.1	13	674	542	132
3 bedrooms	478	21.6	4	474	436	38
4 bedrooms	538	24.3	14	524	509	15
5+ bedrooms	111	5.0	7	104	104	0

Source: 2000 U.S. Census, STF-3 QT-H8 and QT-H5 for Township.

Table 6 compares the Township's average household size for all occupied units, owner-occupied units, and renter-occupied units in 2000 to those of the County and State. The Township's average household size for all occupied and owner-occupied units was similar to those of the County.

**Table 6: Average Household Size for Occupied Units for Township, County, and State**

Jurisdiction	All Occupied Units	Owner-occupied units	Renter-occupied units
Independence Township	2.61	2.76	2.04
Warren County	2.61	2.77	2.19
New Jersey	2.68	2.85	2.37

Source: 2000 U.S. Census, STF-1 DP-1 for Township, County, and State.

The distribution of number of bedrooms per unit is shown in Table 7. The percentage distribution is similar for the Township, County and State.

**Table 7: Percentage of All Units by Number of Bedrooms**

Jurisdiction	None or one	Two or Three	Four or More
Independence Township	17.2	53.5	29.3
Warren County	13.3	62.0	24.7
New Jersey	18.3	59.1	22.6

Source: 2000 U.S. Census, STF-3 QT-H4 for Township, County, and State.

In addition to data concerning occupancy characteristics, the 2000 Census includes a number of indicators, or surrogates, which relate to the condition of the housing stock. These indicators are used by the Council on Affordable Housing (COAH) in calculating a municipality's deteriorated units and indigenous need. The surrogates used to identify housing quality, in addition to age (Pre-1940 units in Table 2), are the following, as described in COAH's rules.

- Persons per Room                      1.01 or more persons per room is an index of overcrowding.
- Plumbing Facilities                      Inadequate plumbing is indicated by either a lack of exclusive use of plumbing or incomplete plumbing facilities.
- Kitchen Facilities                      Inadequate kitchen facilities are indicated by shared use of a kitchen or the non-presence of a sink with piped water, a stove, or a refrigerator.

Table 8 compares the Township, County, and State for some of the above indicators of housing quality. The Township had more overcrowding and inadequate plumbing and kitchens than the County.

**Table 8: Housing Quality for Township, County, and State**

Condition	%		
	Independence Township	Warren County	New Jersey
Overcrowding <sup>7</sup>	1.5	0.5	0.5
Inadequate plumbing <sup>2</sup>	0.6	0.2.	0.7
Inadequate kitchen <sup>2</sup>	0.3	0.3	0.8

Notes: <sup>1</sup>The universe for these factors is occupied housing units.

<sup>2</sup>The universe for these factors is all housing units.

Source: 2000 U.S. Census, STF-3 QT-4 for Township, County, and State.

The last factors used to describe the municipal housing stock are the assessed housing values and gross rents for residential units. In 2000, the median residential housing value was \$169,500 (Table 9) with most of the Township's housing stock falling in the \$150,000 to \$199,999 price range.

**Table 9: Value of Residential Units**

Value	Number	%
Less than \$50,000	4	0.3
\$50,000 to \$99,999	83	5.7
\$100,000 to \$149,999	437	30.2
\$150,000 to \$199,999	445	30.7
\$200,000 to \$299,999	341	23.5
\$300,000 to \$499,999	126	8.7
\$500,000 to \$999,999	0	0
\$1,000,000 or more	12	0.8
Median (dollars)	169,500	

*Source: 2000 U.S. Census, STF-3 DP-4*

Table 10 indicates that in 2000 the majority of renter-occupied units rents were in the range of \$500 to \$749 a month. The median contract rent for the Township was \$720 per month.

**Table 10: Gross Rents for Specified Renter-Occupied Housing Units**

Contract Monthly Rent	Number	%
Less than \$200	0	0
\$200 to \$299	19	4.3
\$300 to \$499	31	7
\$500 to \$749	192	43.5
\$750 to \$999	86	19.5
\$1,000 to \$1,499	89	20.2
\$1,500 or more	6	1.4
No Cash Rent	18	4.1
Median (contract rent)	720	

*Source: 2000 U.S. Census, STF-3 QT-H12 for Township*

The data in Table 11 indicate that in 2000 there were 19 households earning less than \$35,000 annually, which was the approximate income threshold for a three-person, moderate-income household in Hunterdon County in 2000. At least 10 of these households were paying more than 30% of their income for rent; a figure of 30% is considered the limit of affordability for rental housing costs.

**Table 11: Percentage of Household Income in 1999 Applied to Gross Rent**

Percentage of Income	Number of Households	Percentage of Household
Less than 15 percent	80	18.1
15 to 19 percent	77	17.5
20 to 24 percent	52	11.8
25 to 29 percent	49	11.1
30 to 34 percent	55	12.5
35 percent or more	110	24.9
Not computed	18	4.1

*Note:* The universe for this Table is specified renter-occupied housing units.

*Source:* 2000 U.S. Census, STF-3QT-H13 for Township.

## Analysis of Demographic Characteristics

As with the inventory of the municipal housing stock, the primary source of information for the analysis of the demographic characteristics of the Township's residents is the 2000 U.S. Census. The Census data provide a wealth of information concerning the characteristics of the Township's population in 2000.

The 2000 Census indicates that the Township had 5,603 residents, or 1,563 more residents than in 1990, representing a population increase of approximately 13%. The Township's 39.7% increase in the 1990's compares to a 19.6% increase in Warren County and an 8% increase in New Jersey.

The age distribution of the Township's residents is shown in Table 12. Males are predominating in the age classes of 0 to 4, with a female predominance in age's groups 5 to 19, 20 to 34, 35-54, 55-64, 65-74 and over 75.

**Table 12: Population by Age and Sex**

Age	Total Persons	Male	Female
0 – 4	364	198	166
5 – 19	1,223	610	613
20 – 34	1,009	481	528
35 – 54	2,067	1,003	1,064
55 – 64	489	240	249
65-74	253	124	129
75 +	198	54	144
Total	5,603	2,710	2,893

*Source: 2000 U.S. Census, STF-3 QT-P1 for Township.*

Table 13 compares the Township to the County and State by age categories. The principal differences among the Township, County, and State occur in the 70+-age range where the Township and County are greater than the State.

**Table 13: Comparison of Age Distribution for Township, County, and State (% of persons)**

Age	Independence Township	Warren County	New Jersey
0-4	6.5	6.9	6.7
5 – 19	21.9	21.4	20.4
20 – 34	18.0	17.0	19.8
35 – 54	36.8	33.1	39.8
55 – 69	11.1	12.2	11.6
70 +	5.5	9.6	1.6
Median	36.8	37.6	36.7

*Source: 2000 U.S. Census, STF-3 QT-P1 for Township, County, and State.*

Table 14 provides the Census data on household size for the Township, while Table 15 compares household sizes in the Township to those in Warren County and the State. The Township and County differed from the State in terms of the distribution of household sizes by having a greater percentage within each category.

**Table 14: Persons in Household**

Household Size	Total Units
1 person	525
2 persons	669
3 persons	356
4 persons	388
5 persons	155
6 persons	33
7+ persons	20
Total	1,693

*Source: 2000 U.S. Census, STF-1 QT-P10 for Township.*

**Table 15: Comparison of Persons in Household for Township, County, and State (% of households)**

Household Size	Township	County	State
1 person	64	58.5	24.5
2 persons	60.3	61.9	30.3
3 persons	31.2	32.3	17.3
4 persons	28.1	29	16
5 persons	12.1	12.7	7.5
6 persons	2.1	3.8	2.7
7 or more persons	2.3	1.9	1.7
Persons per household	2.61	2.61	2.68

Source: 2000 U.S. Census, STF-3 QT-P10 for Township, County, and State.

Table 16 presents a detailed breakdown of the Township's population by household type and relationship. There were 3,656 persons in family households in the Township and 560 persons in non-family households; a family household includes a householder living with one or more persons related to him or her by birth, marriage, or adoption, while a non-family household includes a householder living alone or with non-relatives only. In terms of the proportion of family and non-family households, the Township had more family households than the County or State (86.4% for the Township, 71.1% for the County, and 70.3% for the State).

**Table 16: Persons by Household Type and Relationship**

	Total
In family Households:	1,490
Spouse	1,287
Child	783
In Non-Family Households:	656
Male householder:	56
Living alone	30
Not living alone	26
Female householder:	147
Living alone	77
Not living alone	70
In group quarters:	0
Institutional	0
Non-institutional	0

Source: 2000 U.S. Census, SF-1 QT-P10, 11 and 12 for Township.

Table 17 provides 1999 income data for the Township, County, and State. The Township's per capita and median incomes were higher than those of the County and the State were.

**Table 17: 1999 Income for Township, County, and State**

Jurisdiction	Per Capita Income	Median Income	
		Households	Families
Independence Township	\$30,555	\$67,247	\$79,819
Warren County	\$25,728	\$66,223	\$72,788
New Jersey	\$27,006	\$55,146	\$65,370

*Source: 2000 U.S. Census, SF-3 DP-3 for Township, County, and State.*

Table 18 addresses the lower end of the income spectrum, providing data on poverty levels for persons and families in 2000. The determination of poverty status and the associated income levels is based on the cost of an economy food plan and ranges from an annual income of \$8,501 for a one-person household to \$28,967 for an eight-person family for the year 1999. According to the data in Table 18, the Township had proportionately lower persons qualifying for poverty status than the County. The percentages in Table 18 translate to 158 persons and 18 families were classified in poverty status. Thus, the individual persons had a much larger share of the population in poverty status.

**Table 18: Poverty Status for Persons and Families for Township, County, and State  
(% with 1999 income below poverty)**

Jurisdiction	Persons (%)	Families (%)
Independence Township	2.8	1.2
Warren County	6.7	5.0
New Jersey	8.5	19.4

*Source: 2000 U.S. Census, SF-3 DP-3 for Township, County, and State.*

The U.S. Census includes a vast array of additional demographic data that provide insights into an area's population. For example, Table 19 provides a comparison of the percent of households who moved into their current residents in 1995; this is a surrogate measure of the mobility/stability of a population. The data indicate that the percentage of the year 2000 Township residents residing in the same house as in 1995 was below that of the County and State.

**Table 19: Comparison of Place of Residence for Township, County, and State**

Jurisdiction	Percent living in same house in 1995
Independence Township	52.6
Warren County	57.9
New Jersey	59.8

Source: 2000 U.S. Census, SF-3 QT-H7 for Township, County, and State.

Table 20 compares the educational attainment for Township, County, and State residents over age 25. The data indicate that more Township residents achieved a high school diploma or higher or a bachelor's degree or higher than the County and State.

**Table 20: Educational Attainment for Township, County, and State Residents (Persons 25 years and over)**

Jurisdiction	Percent (%) high school graduates or higher	Percent (%) with bachelor's degree or higher
Independence Township	91.2	35.7
Warren County	84.9	24.4
New Jersey	82.1	29.8

Source: 2000 U.S. Census, SF-3 DP-2 for Township, County, and State.

The 2000 Census also provides data on the means of transportation, which people use to reach their place of work. Table 21 compares the Census data for the Township, County, and State relative to driving alone, carpooling, using public transit, and using other means of transportation. The Township had a relatively high percentage of those who drive alone, and a relatively low percentage of workers who carpool or use public transit. Of the 6% of workers who resided in the Township and used other means of transportation to reach work, 115 workers worked from home and 65 workers walked to work.

**Table 21: Means of Transportation to Work for Township, County and State Residents (Workers 16 years old and over)**

Jurisdiction	Percent who drive alone	Percent in carpools	Percent using public transit	Percent using other means
Independence Township	83.5	8.7	1.9	6.0
Warren County	81.4	10.9	1.2	6.5
New Jersey	73	10.6	9.6	6.8

Source: 2000 U.S. Census, SF-3 DP-3 for Township, County, and State.

The US Census supplies data on the employment by industry within a municipality. While the most current data available is from 1999, and given current economic conditions, it may provide a snapshot into employment in the Township. As witnessed in 1999, the most predominate industry in the Township is educational, health and social services, followed by manufacturing.

**Table 22: Employment and Waged: 1999 Annual Report by Industry**

<b>INDUSTRY</b>	<b>Employees</b>	<b>%</b>
Agriculture, forestry, fishing and hunting, and mining	9	0.3
Construction	288	9.1
Manufacturing	432	13.7
Wholesale trade	159	5
Retail trade	324	10.3
Transportation and warehousing, and utilities	181	5.7
Information	128	4.1
Finance, insurance, real estate, and rental and leasing	203	6.4
Professional, scientific, management, administrative, and waste management services	380	12.1
Educational, health and social services	539	17.1
Arts, entertainment, recreation, accommodation and food services	160	5.1
Other services (except public administration)	165	5.2
Public administration	184	5.8

The employment rate, according to the Department of Labor for 2008, shows that the Township had a higher percentage of people in the labor force, as well as higher employment of those in the labor force than the County.

**Table 23: Labor Force and Employment**

Jurisdiction	Labor Force	Employed	Unemployed	Unemployment Rate
Independence Township	3,529	3,465	164	1.8%
Warren County	59,171	56,171	3,000	5.1%