TOWNSHIP OF HOPEWELL

MERCER COUNTY

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September 8, 2016

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

RE: Comments on Draft Environmental Impact Statement
Docket CP15-558-000
Proposed Gas Pipeline
PennEast Pipeline Company LLC
Hopewell Township, Mercer County

Dear Ms. Bose,

Hopewell Township has an obligation to provide its fair share of affordable housing, as mandated by the New Jersey Constitution, the state Affordable Housing Act, and the New Jersey Supreme Court. See, *Adoption of N.J.A.C. 5:96 and 5:97 by N.J. Council on Affordable Housing*, 221 N.J. 1 (2015) (Mount Laurel IV).

In order to meet this requirement, Hopewell Township purchased the 46.104 acre tract known as Block 85, Lot 3 for the express purpose of providing affordable housing. This tract is integral to the Township's Affordable Housing Plan (attached), which is currently subject to the jurisdiction of the Superior Court (see, *In the Matter of the Application of the Township of Hopewell*, Docket No. MER-L-1557-15). The Penn East pipeline is planned to bisect this lot, permanently impairing its ability to provide the required affordable housing.

As part of the current litigation, an expert retained by the Fair Share Housing Center and other interested parties has issued a report indicating that Hopewell Township's constitutional housing obligation for affordable housing is in excess of 1,000 units. In order to achieve this obligation, a minimum design density of 15 dwelling units per acre would be required on the subject tract. The Hopewell Township Planning Board has developed the attached spreadsheet demonstrating how Hopewell Township can reasonably meet this obligation.

The PennEast pipeline continues to prevent the construction of a minimum of 30 affordable units based upon the attached schematic plan. This is an unacceptable impact because it deprives Hopewell Township of its ability of meeting its constitutional obligation.

On page 2 of Hopewell Township's scoping comments submitted to FERC at it 2/25/15 scoping meeting, a very specific concern was raised regarding the PennEast impact to this tract. These comments as stated read as follows:

1. ***AFFORDABLE HOUSING IMPACTS***
   a. *The **DRAFT** depiction of the Preferred Alternate Route will encumber land on a designated affordable housing tract known as Tax Block 85, Tax Lot 3. This encumbrance will impact Hopewell Township's ability to provide affordable housing on this tract. Providing affordable housing is a constitutional obligation which should not be pre-empted.* ***The EIS must address this impact.***

The efforts by PennEast to relocate a portion of its pipeline have not addressed the impact to Hopewell Township's affordable housing obligation. Because Hopewell Township's obligation is a constitutional obligation, enforced by the courts, the only option available at this time is the NO impact option. There can be no loss of area to Block 85 Lot 3. This may be achieved by:

1. Relocating the pipeline such that it does not affect any portion of Block 85 Lot 3.

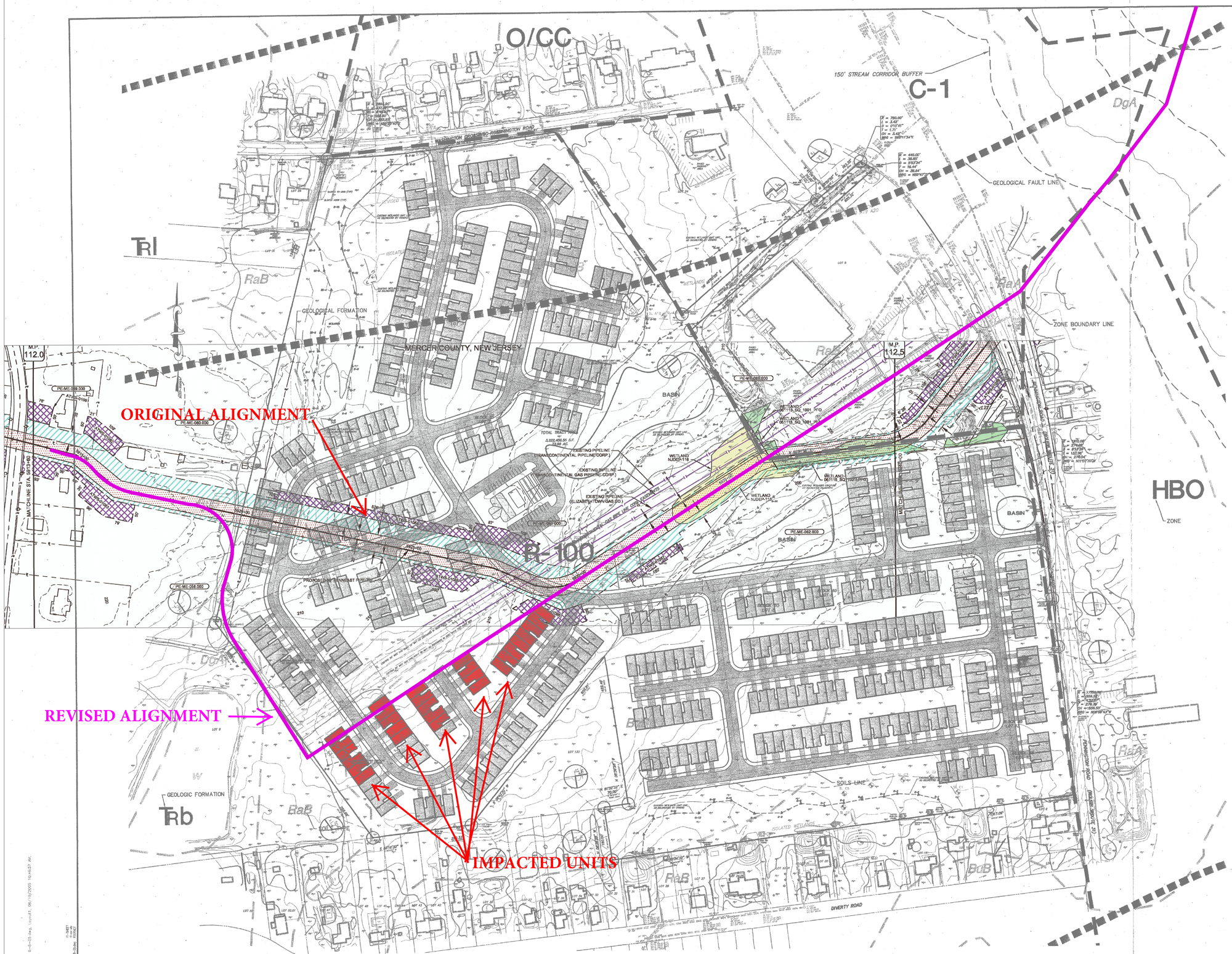
2. Relocating the proposed PennEast connection to the Transcontinental Gas pipeline (Transco) will eliminate the need to bisect Block 85 Lot 3. A physical connection to Transco is possible west of Block 85, Lot 3.

Sincerely,

Kevin D. Kuchinski, Mayor

C: Hopewell Township Committee
Steven P. Goodell, Esquire
Governor Chris Christie
Senator Robert Menendez
Senator Cory Booker
Senator Shirley Turner
Congresswoman Bonnie Watson Coleman
Assemblywoman Elizabeth Maher Muoio
Assemblyman Reed Gusciora

Mercer County Board of Chosen Freeholders
Robert Martin, NJDEP Commissioner
John Gray, NJDEP Deputy Chief of Staff
Judith A. Enck, USEPA Region 2 Administrator
John Eddins, ACHP



ZONING

ZONED R-100

R-100 ADULT HOUSING OPTION

ORDINANCE REQUIRES (SEC. 17-159.3)

	REQUIRED
LOT AREA	7 Ac.
LOT WIDTH	300'
LOT DEPTH	300'
FRONT SETBACK	50'
SIDE YARD SETBACK	25'
REAR YARD SETBACK	25'
DIST. BETWEEN BUILDINGS	30'
BUILDING HEIGHT	30FT / 2 STORIES
LOT COVERAGE	55%
MAX FAR	NONE
PARKING	2.3 PER UNIT (RSIS)

TOTAL NUMBER OF TOWNHOUSE UNITS = 418

SOILS LEGEND:

		DEPTH TO BEDROCK (FT)	DEPTH TO SEASONAL HIGH GROUND WATER (FT)
BuB	BUCKS SILT LOAM, 2-6% SLOPES	3.5 – 5	6+
BuB2	BUCKS SILT LOAM, 2-6% SLOPES	3.5 – 5	6+
DgA	DOYLESTOWN & REAVILLE SILT LOAM 0-2% SLOPES	3.5 – 5	0 – 1
RaA	READINGTON & ABBOTTSTOWN SILT LOAM, 0-2% SLOPES	3 – 4	1.5 – 2.5
RaB	READINGTON & ABBOTTSTOWN SILT LOAM, 2-6% SLOPES	3 – 4	1.5 – 2.5

GROSS DENSITY CALCULATION:

TOTAL SITE AREA	73.98 Ac.
LESS WATER COURSES	0.00 Ac.
LESS SEASONAL HIGH WATER AT SURFACE	0.53 Ac.
LESS SLOPES GRATER THAN 20 PERCENT	0.06 Ac.
LESS 50% AREA OUTSIDE WATER COURSE AND WITHIN 100 YEAR FLOOD PLAIN	0.00 Ac.
LESS 50% SLOPES BETWEEN 10 – 20 PERCENT	0.04 Ac.
LESS 50% SEASONAL HIGH WATER 0.5 – 1.5'	0.00 Ac.
NET SITE AREA	73.35 Ac.
GROSS DENSITY	5.69 UNITS PER ACRE

GEOLOGIC FORMATION: LOCKATONG AND STOCKTON

FILE COPY

REVISION NO. | DATE | REVISION

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GRAPHIC SCALE IN FEET

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Engineers and Consultants

Cert. Of Authorization 24GA27926200

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RESIDENTIAL TOWNHOME AS-OF-RIGHTS PLAN

BEAZER HOMES

PENNINGTON TRACT

BLOCK 85 – LOTS 3, 8 AND 13

TOWNSHIP OF HOPEWELL MERCER COUNTY NEW JERSEY

PROJECT NO. 04036303	DATE 6/8/05
DRAWN BY BD	DESIGNED BY JMW
SCALE 1" = 100'	CHECKED BY RJC
SCHOOR DEPALMA	
SHEET NO. 1 of 1	

MANALNT

HOPEWELL TOWNSHIP HOUSING PLAN
OCTOBER 15, 2015 AFFORDABLE DEVELOPMENT SCENARIO

Excess Round 2 Units Applicable to Round 3			64
Round 3 Provided Up To June 2015	Community Options	*(rental)*	4
	HomeFront	*(rental)*	3
	Wrick Ave	*(sale)*	1
	Minnietown Lane	*(sale)*	2
	Accessory Apts	*(rental)*	1
	Project Freedom	*(rental)*	72
Total Units Provided to June 2015 for Round 3 (Including Round 2 Excess)			**147**
Total Rental Bonus			**79**
Total Affordable Units Applicable to Round 3			**226**

Tract Number	Block	Lot	Zone	Lot Area Information					Gross Density (DU/ac)	Total Units	Affordable Units	Total Market Rate Units
				Gross Ac.	Environmentally Constrained Ac.	Developed Ac.	Other Encumbered Ac.	Developable Ac.				
Excess Round 2 Units plus Round 3 through June 2015											226	
Hopewell Township (Tract A-Zaitz)	85	3	R-100	44.1	7.4	0.0	1.3	7.0		75	75	0
								28.3	15	425	106	318
Enourato et al (Tracts B, C & D)	78	15.01, 16, 17, 35	HBO	22.0	4.0	5.0	0.0	13.1	15	196	44	152
CF Hopewell LLC Scotch Road East (Tracts F, H & J)	91	3.11, 3.191, 3.95	OP	150.1	69.4	6.0	27.5	47.2	20	944	283	661
CHS (Tracts G, I & K)	91	3.181, 3.961, 3.22	OP	165.3	41.9	65.2	7.9	50.3		350	35	315
CF Hopewell LLC Scotch Road West (Tract L)	93	6.01	OP	200.5	53.5	0.0	0.0	117.0	6	702	140	562
								30.0	10	300	45	255
Klockner (Tract M)	78.09	21	R-100	22.4	6.1	0.0	0.0	16.3	15	244	55	189
Sheet Totals				**604**	**182.3**	**76.2**	**36.7**	**309**	**81**	**3235**	**1010**	**2451**
										Unused Rental Bonus (See Note #3)	**301**	
										Total Affordable Units this Scenario	**1311**	

NOTES:

1. NJAC provides 6 du/ac for single family development with a 20% set aside for affordable. NJAC provides 10 du/ac for rentals with a 15% set aside for affordable. When this sheet identifies gross densities that are greater than NJAC, the set aside ratios increased using a linear relationship.

2. Tracts E, N and O were removed from consideration by the Planning Board at its September 17, 2015 special meeting.

3. The CAP for 2:1 rental bonus is 25% of prior round obligation plus present round obligation. For 1,000 units, the CAP is 1,520 x 0.25 or 380 units. Beyond 380 affordable rental unit affordable bonus is 1:1

Housing Plan Element and Fair Share Plan

Township of Hopewell
Mercer County, New Jersey

Prepared by the Hopewell Township Planning Board in consultation with Francis J. Banisch III, AICP/PP

Adopted by the Planning Board on November13, 2008

Amended by the Planning Board on November 17, 2011

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

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Calculation of Fair Share

The affordable housing obligation is cumulative and includes the affordable housing need for the period 1987 to 2018. The affordable housing obligation consists of three components: the rehabilitation share; the prior round obligation (1987 to 1999); and, growth share (1999 to 2018).

Rehabilitation Share

The rehabilitation share for affordable housing is the number of existing housing units as of April 1, 2000 that are old, crowded and deficient and also occupied by households of low- and moderate-income. The rehabilitation share for each municipality is provided in Appendix C of N.J.A.C. 5:97-1 et seq. (the COAH third round substantive rules). The rehabilitation share for the Township is 5 affordable units. The Township has provided 34 rehabilitated units since April 1, 2000.

Prior Round Obligation

The prior round obligation is the municipal new construction obligation from 1987 to 1999. Obligations from the first and second rounds have been recalculated to include the most recent data from the 2000 Census. The result is the Township's prior round obligation decreased from 521 affordable units to 520 affordable units.

Credits/Reductions from Prior Round Obligation

The Township is eligible for the following credits and reductions from its prior round obligation of 520 units:

TABLE 1. Prior Round Credits/Reductions

Category/Development	Total Affordable Units	Rental Credits	Age-Restricted units	Housing Unit Credits
Regional Contribution Agreements	198			198
Pennington Pointe	5		5	5
CIFA Group Home	4	4		8
Brandon Farms	138			135
Bonus for Substantial Compliance	46			46
Hopewell Gardens	149			
Handicapped	15	15		30
Age-restricted*	134	28	85	113
Total				**535**

* Because of the cap on the number of age-restricted units, only 85 of the 134 age-restricted units could be counted in the prior round obligation. The 49 age-restricted rental units are excess units that can be carried to the third round.

Based on the above analysis, the Township has 15 excess units from its prior round obligation that can be carried forward to the Third Round (520 affordable units from prior round obligation and 535 housing unit credits). In addition, the Township has an excess of 49 age-restricted rental units that can be carried to the Third Round.

Residential Growth Share

In the rules published by COAH in January 2008, subsequently adopted in June 2008 and then draft revisions published in June 2008 and adopted in September 2008, the Council indicated that the Township would increase by 1,474 housing units from 2004 to 2018 (Appendix F of NJAC 5:97-1 et seq.). This estimate is in stark contrast to the projections of the Delaware Valley Regional Planning Commission (DVRPC), which is the Metropolitan Planning Organization (MPO) for the Township. The DVRPC has established that the Township will grow by 515 households in the period 2005-2015.

However, NJAC 5:97-2.4(a) permits the municipality to exclude market-rate units within inclusionary developments that are constructed after January 1, 2004 from residential growth for the purposes of projecting the growth share. Hopewell Grant, which includes the 240 market-rate units for the 149 unit Hopewell Gardens affordable project, has 182 units which have been occupied after January 1, 2004, and which can be used to reduce the household projection. In addition the 149 unit affordable project also can be deducted. Dividing the resulting household projection of 1,143 units by 5 (one affordable unit for each four market-rate units) yields a residential growth share of 228.6 affordable units based on this calculation.

Nonresidential Growth Share

The nonresidential growth share is based on one affordable unit for each new 16 jobs created in the Township. The estimate from Appendix F of the COAH rules is 4,064 new jobs over the period 2004-2018. Based on this calculation, the nonresidential growth share is 254 affordable units.

Total Fair Share Obligation

TABLE 2. Fair Share Obligation

Category	Required units	Units provided
Rehabilitation share	5	5
Prior round obligation	520	535
Growth share obligation	483 (Estimate of future development)	
Total	1,008	540

The Township's total fair share for the period from 1987-2018 is 1,008 affordable units. The Township has provided 535 units under the prior rules (15 units in excess of the prior round obligation), and has an additional 49 units not counted in the prior round, consisting of 49 age-restricted rental units, that it will put towards its third round obligation.

Fair Share Plan

In the previous section a fair share obligation of 1,008 units has been established. The following outlines how this obligation will be addressed.

Table 3 below summarizes the Hopewell Township fair share obligation and the plan for meeting that obligation. Additional details for each component of the plan are provided in the narrative that follows the table.

TABLE 3. Hopewell Township Fair Share Obligation, Summary of Requirements and Planned Round Three Compliance			
		Requirement	**Township Provision**
Total Fair Share Obligation		**Unknown**	--
Rounds One and Two		**520**	**535**
Rehabilitation Share		5	5
Round Three (Growth Share) Requirement		**Unknown**	
Excess		--	15
Not Counted in Prior Rounds, Eligible in Round Three		--	49
Subtotal, Excess Applicable to Round Three Requirements		--	**64**
Net New Round Three Requirement After Excess from Prior Rounds		**Unknown**	--
1.	Scattered Site Projects (Community Options, HomeFront, Wrick Avenue, Minnietown Lane)	--	15
2.	Accessory Apartments	--	10
3.	Block 78, Lot 10.04 (Project Freedom)	--	70
4.	Block 33, Lot 1.02 (Pennytown)	--	70
5.	Block 91, Lot 3.96 (Capital Health Systems)*	--	70
6.	Block 93, Lot 5 (Burroughs tract)	--	7
7.	Block 85, Lot 3 (Zaitz tract)	--	180
8.	Residential development (ongoing, inclusionary zoning distributed throughout Hopewell Township)	--	50
Total Units applicable to Round Three		--	**472**
Excess for Round Three Requirement		--	*53*

*Specifically as to CHS, the Developer's Agreement indicates the following:

"CHS will satisfy any affordable housing obligation that its project imposes on the Township, as such obligation is set forth in the Township's affordable housing ordinances enacted in accordance with the rules and regulations of the New Jersey Council on Affordable Housing as are in effect at the time the applicant applies for a Certificate of Occupancy for the proposed development or any portion thereof, or as modified or amended by the New Jersey Council on Affordable Housing and/or a court of final jurisdiction subsequent to that time, either through on site construction or other means acceptable to the Township, or a combination of both".

Rehabilitation

The Township has satisfied its rehabilitation obligation of five affordable units. Thirty-four units have been rehabilitated since April 1, 2000.

Prior Round Obligation

The adjusted prior round allocation of affordable units is 520 affordable units. The Township has provided 535 affordable units, resulting in an excess of 15 affordable units. In addition, the Township has 49 age-restricted rental units that could not be counted in the prior round obligation, but can be carried to the third round.

Excess Units from Prior Round Obligation

In accordance with the calculations provided in the previous section, the Township has established that it has 49 excess units consisting of age-restricted, rental units at the Hopewell Gardens facility, and 18 additional units that exceeded the prior round obligation. These excess units will be utilized to address a portion of the Township's fair share and rental obligations, and will be applied to limit the number of new age-restricted, affordable dwellings that can be provided.

Municipally Sponsored and 100 percent Affordable Programs

The Township is proposing the use of five properties for municipally sponsored, 100 percent affordable programs (NJAC 5:97-6.7):

- Block 2, Lot 8 is a 1.1 acre parcel on Minnietown Lane and Hopewell Wertsville Road. The Township intends to provide 2 modular units on the property. The Township owns the property, which it purchased using funds from the Township's affordable housing trust account. The property is located in a residential zoning district where the use is permitted. The Township has prepared an analysis to provide new septic systems to support the proposed use. (Table 3, Reference Number 1)
- Block 130, Lot 77.01 on Wrick Avenue, a 0.5 acre parcel which the Township obtained through a tax foreclosure. The Township has entered a contract to construct a modular home on this property. The property is located in a residential zoning district and has a well and septic system available. (Table 3, Reference Number 1)

- Block 33, Lot 1.02 is a 25 acre parcel with frontage on Marshall's Corner-Woodsville Road, Pennington-Hopewell Road (County Route 654), and Route 31. The tract currently has an on-site wastewater treatment plant that could service up to 60 affordable units. (Table 3, Reference Number 4)

- Block 93, Lot 5 on Scotch Road, is a 34 acre parcel acquired by the Township specifically for affordable housing purposes. The Township is seeking an experienced developer of affordable housing to provide 30 to 50 units on this property, and intends to prepare a Request for Proposals (RFP) to solicit such a developer. However, wastewater treatment limitations may only permit seven units if conventional on-site disposal is utilized. If possible, wastewater treatment will be provided through an on-site community wastewater treatment system or connection to ELSA, and potable water through a public water supply system or an on-site well. The property is adjacent to major employers and in close proximity to the municipal complex, and is located in a residential zoning district. (Table 3, Reference Number 6)

- Block 85, Lot 3 The Zaitz tract (Block 85, Lot 3) is hereby substituted for the previously designated Weidel Tract (Block 88, Lot 5.021). The Weidel tract was landlocked and the majority of the site (74%) is wooded. Before Weidel is capable of being developed, an estimated taxpayer investment of $3,100,000 is required to provide access to the public roadway system and sewer/water infrastructure to the site. Weidel was the only municipal site available with potential access to sewer/water infrastructure at the time of the Round 3 COAH mandate and as such it was selected as an affordable housing site.

  The Zaitz tract (Block 85, Lot 3) is more particularly well suited for housing. This 44-acre tract has frontage along Mercer County Route 546. This tract is an open agricultural lot which is disconnected from other major agricultural tracts, making it less desirable for agriculture related uses. The Zaitz tract has fewer environmental constraints than Weidel and is located within an area designated for new public sewer and public water infrastructure. The Zaitz tract is within close proximity to retail services and has access to mass transit which the Weidel tract did not. The Township plans to construct approximately 200 affordable units on the tract, utilizing an experienced developer of affordable housing and subject to a forthcoming Request for Proposals. (Table 3, Reference Number 7)

Municipally sponsored affordable housing projects require additional documentation, beyond site control as noted above. The housing sites satisfy the following criteria:

- The selected sites are suitable pursuant to NJAC 5:97-3.13 in that they are either in Planning Area 2 or are consistent with sound planning principles and the goals, policies and objectives of the State Development and Redevelopment Plan (SDRP);
- The Township has the capability to administer the projects in accordance with the Uniform Housing Affordability Controls (NJAC 5:80-26). The Township has a municipal housing liaison to administer the projects, and will seek administrative help if needed;

- The units will have a low/moderate income split in accordance with the Uniform Housing Affordability Controls (UHAC), providing at least 50% of the units for low-income households and no more than 50% for moderate-income households;
- The units will be affirmatively marketed by the Township's municipal housing liaison or another agency in accordance with the UHAC rules;
- The units will have the appropriate controls on affordability in accordance with the COAH and UHAC rules;
- The units will have the appropriate bedroom distribution, providing a mix of one-, two- and three-bedroom units for the municipal construction project;
- The municipality has adequate funding capabilities through the use of development fees, payments in lieu of construction, or bonding capability if necessary;
- The construction will begin within 2 years of the grant of substantive certification.

Accessory Apartments

The revised Third Round rules permit a deed restriction on affordability controls of 10 years, rather than the 30 year restriction that was proposed in the prior Third Round rules. The 30 year restriction was a deterrent to the program. In addition, the minimum payment to the property owner is now $25,000 for the creation of a low-income dwelling, and $20,000 for the creation of a moderate-income dwelling. The Township is including 10 units in its Third Round compliance plan, but if the program is successful can provide up to 50 units through this mechanism. (Table 3, Reference Number 2)

Supportive and Special Needs Housing

The Township is proposing the use of two group homes on property owned by the Township to address its fair share obligation (NJAC 5:97-6.10) concerning supportive and special needs housing. The first of these is designated as Lot 5 in Block 93 and is located on Scotch Road. Currently on the 34 acre property are a 2-family dwelling and a single-family dwelling, yielding three affordable dwelling units (one 3-bedroom and two 2-bedroom). The property will be leased to Home Front for 3 family rental units. (Table 3, Reference Number 1)

Block 26, Lot 4.03 on Harbourton Rocktown Road, a 1 acre parcel which includes an existing dwelling and outbuildings. The existing dwelling will be demolished and replaced. The Township owns the property, which it purchased using funds from the Township's affordable housing trust account. The property will be conveyed to Community Options for the construction of a 4 bedroom group home for individuals with learning disabilities. The property is located in a residential zoning district and the use is permitted. A new septic system has been provided. (Table 3, Reference Number 1)

Block 78, Lot 10.04 is a 22 acre parcel located on Denow Road east of Route 31. The Township is proposing to lease the land to Project Freedom for the development of approximately 100

units, the majority of which will be for the developmentally disabled. The tract currently has a sewage treatment allocation from ELSA. (Table 3, Reference Number 3)

The Township has control of these properties through fee simple ownership. The Township's contribution is the property and any assistance it may provide in securing approvals and additional ancillary funds. The interested organizations are to provide sources of funding beyond that available from the Township. The agencies have indicated that adequate funding can be provided.

The Municipal Land Use Law (MLUL, NJSA 40:55D-66.1) indicates that community residences (group homes) shall be a permitted use in all residential zoning districts of a municipality, and the requirements shall be the same as for single family dwelling units located within such districts. Both of the proposed group homes are located within a residential zoning district.

Residential Development

The Township's build-out analysis identifies properties that can meet COAH's requirement of one affordable unit per four market-rate units, i.e. a five lot subdivision is possible. This analysis of the R-150, VRC and MRC zoning districts indicates that 145 affordable units may be provided in these residential districts. However, the Township is taking credit for only 50 affordable units from this category, as it is unlikely the build-out will occur by 2018, and not all subdivided lots will contribute to growth share. In addition, the Township intends to incorporate COAH's standard for a 20 percent affordable housing set-aside into the zoning provisions for all residential and mixed-use districts. (Table 3, Reference Number 8)

Rental Housing

The COAH rules indicate that at least 25 percent of a municipality's growth share obligation shall be addressed with rental housing (NJAC 5:97-3.10(b)3), and that at least 50% of the rental housing obligation addressed within the municipality must be family housing units (NJAC 5:97-3.9). Given the Township's growth share obligation of 483 units, 121 units must be rental housing, and no more than 60 units may be addressed through age-restricted housing. The Township has a prior cycle credit of 49 age-restricted rental units. Thus, 72 additional rental units are required, 11 of which could be age-restricted units. The three units on Block 93, Lot 5 to be developed under the auspices of Home Front will satisfy some of the family unit rental obligation. With the Project Freedom project of approximately 70 units, and the municipally constructed, 100 percent affordable developments that are contemplated, the Township will well exceed its rental obligation, and thus should be eligible for additional rental credits.

Age-Restricted Housing

The COAH rules indicate that not more than 25 percent of the growth share obligation addressed within a municipality may be met with age-restricted housing (NJAC 5:97-3.10(c)2). Thus, the Township can provide up to 120 affordable units for age-restricted households. The Township has 49 excess age-restricted units that it is carrying forward to the third round. Therefore, the

Township has the option to supply 71 age-restricted units in the Municipally Sponsored and 100 percent Affordable Programs to address the growth share obligation.

Additional Potential Projects

An individual has also expressed an interest in developing a 9 unit affordable assisted living project. As the Township's growth share obligation evolves over the next decade, and the individual is in a position to present firm plans, this project may also benefit the Township's affordable housing inventory.

Nonresidential Development

With regard to nonresidential development, the Township is considering a number of options to address the growth share component created by nonresidential development, which is projected to be the bulk of the Township's growth share. The Township is amending its development fee ordinance to require a 2.5 percent contribution of the equalized assessed value of new development to the affordable housing trust fund. Some nonresidential developers have committed to addressing whatever the prospective affordable housing need entails. For example, Capital Health Systems (CHS) has committed to fulfill its affordable housing requirement, and even though the bulk of the CHS development is exempt from the growth share calculation, CHS has identified a 10 acre site that is suitable for affordable housing. A preliminary site plan for 80 affordable units has been prepared, but the short-term obligation should range between 26 and 52 units. (Table 3, Reference Number 5)

Growth Share Ordinance

The Township has prepared a draft growth share ordinance to address potential residential and nonresidential development. The draft growth share ordinance requires for residential development either construction of the affordable housing obligation on-site or off-site, or a payment in lieu of construction. The payments in lieu of construction will be utilized to fund affordable housing activities within the Township, such as the municipally sponsored construction projects.

Development Fee Ordinance

The Township has prepared an amended development fee ordinance that increases the fee to 1.5% of the equalized assessed value for residential development and 2.5% of the equalized assessed value for nonresidential development. The Township will utilize these funds to contribute to the municipally sponsored and 100% affordable projects.

Implementation Schedule

The following Table 4 identifies the implementation phasing plan for the Hopewell Township compliance plan.

Table 4. Hopewell Township Implementation Phasing Plan					
2009-2010		**2011-2012**	**2013-2014**	**2015-1016**	**2017-2018**
• Municipal property acquisition • Project site planning and permitting • Provider agreements • Non-municipal financing secured • 64 units for excess units from prior round obligation • 15 units at scattered sites • 2 units for accessory apartments • 9 units for Inclusionary residential developments • 70 units for Project Freedom • Compliance assessed		• Project site planning and permitting • Provider agreements • Additional non-municipal financing secured • 2 units for accessory apartments • 6 units for inclusionary residential developments • 70 units at Pennytown • Master Plan reviewed • Housing Plan reviewed • Compliance assessed • CHS COs issued	• Project site planning and permitting • Provider agreements • Additional non-municipal financing secured • 26 units for CHS • 2 units for accessory apartments • 12 units for inclusionary residential development • 40 units for Zaitz tract • Compliance assessed	• 44 units for CHS • 7 units for Burroughs tract • 2 units for accessory apartments • 13 units for Inclusionary residential development • 90 units for Zaitz tract • Compliance assessed	• 50 units for Zaitz tract • 2 units for accessory apartments • 10 units for inclusionary residential development • Compliance assessed • Master Plan reviewed • Housing Plan reviewed
Cumulative Round III Units	160	238	318	474	536

Inventory of Municipal Housing Conditions

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.

According to the 2000 Census, the Township had 5,629 housing units, of which 5,498 (98%) were occupied. Table 5 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. While the Township largely consisted of one-family, detached dwellings (86% of the total, compared to 49% in the County), there were 791 units in attached or multi-family structures. The Township had a relatively low percentage of renter-occupied units, 7%, compared to 33% in Mercer County and 34% in the State.

TABLE 5: Units in Structure by Tenure

Units in Structure	Vacant Units	Occupied Units		
		Total	Owner	Renter
1, detached	99	4,731	4,481	250
1, attached	7	549	528	21
2	13	85	21	64
3 or 4	6	23	0	23
5+	6	102	71	31
Other	0	0	0	0
Mobile home or trailer	0	8	8	0
Total	**131**	**5,498**	**5,109**	**389**

Source: 2000 U.S. Census, Summary Tape File 3 (STF-3) for Township, QT-H10.

Table 6 indicates the year housing units were built by tenure, while Table 7 compares the Township to Mercer County and the State. Approximately 79% of the owner-occupied units in the Township have been built since 1950, and 93% of the units built since 1950 were owner-occupied. Interestingly, the highest rate of renter occupied units was built before 1950.

TABLE 6: Year Structure Built by Tenure

Year Built	Vacant Units	Occupied Units		
		Total	Owner	Renter
1990-2000	13	1,672	1,639	20
1980-1989	0	531	531	0
1970-1979	6	537	514	17
1960-1969	41	864	789	34
1950-1959	22	873	746	105
1940-1949	0	282	226	56
Pre-1940	49	870	664	157

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

Table 7 compares the year of construction for all dwelling units in the Township to Mercer County and the State. The Township had a much larger percentage of units built between 1990-2000 than did the County or State, and a smaller percentage of units built before 1950, although the Township was very similar to the County and State in the 1950s and 1960s. These differences are highlighted further by the median year of construction.

TABLE 7: Comparison of Year of Construction for Township, County, and State

Year Built	----------%----------		
	Hopewell Township	Mercer County	New Jersey
1990 – 2000	29.7	10.2	10.5
1980 – 1989	9.4	12.4	12.4
1970 – 1979	9.5	12.5	14.0
1960 – 1969	15.3	15.2	15.9
1950 – 1959	15.5	16.6	17.1
1940 – 1949	5.0	9.6	10.1
Pre-1940	15.5	23.5	20.1
Median Year	**1969**	**1960**	**1962**

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

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 8 and 9, respectively. Table 4 indicates that renter-occupied units generally housed smaller households, with 68% of renter-occupied units having 2 persons or fewer compared to 50% of owner-occupied units. Table 5 indicates that renter-occupied units generally had fewer bedrooms, with 55% having two bedrooms or fewer, compared to 13% of owner-occupied units.

TABLE 8: Household Size in Occupied Housing Units by Tenure

Household Size	Total Units	Owner-occupied Units	Renter-occupied Units
1 person	878	740	138
2 persons	1960	1834	126
3 persons	978	915	63
4 persons	1105	1069	36
5 persons	442	420	22
6 persons	103	100	3
7+ persons	32	31	1
Total	**5498**	**5109**	**389**

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

TABLE 9: Number of Bedrooms per Unit by Tenure

Number of Bedrooms	Total Units	(%)	Vacant Units	Occupied Units		
				Total	Owner	Renter
No bedroom	0	0	0	0	0	0
1 bedroom	216	3.8	13	203	97	106
2 bedrooms	783	13.9	19	764	589	175
3 bedrooms	2126	37.8	49	2077	2013	64
4 bedrooms	2010	35.7	40	1970	1939	31
5+ bedrooms	494	8.8	10	484	471	13

Source: 2000 U.S. Census, SF-3 for Township, QT-H8.

Table 10 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 owner-occupied units was the same as those of the State, and higher than those in Mercer County. The average household size for renter-occupied units was lower than for the State or County.

TABLE 10: Average Household Size for Occupied Units for Township, County, and State

Jurisdiction	All Occupied Units	Owner-occupied units	Renter-occupied units
Hopewell Township	2.77	2.81	2.21
Mercer County	2.62	2.75	2.37
New Jersey	2.68	2.81	2.43

Source: 2000 U.S. Census, SF-3 for Township, County, and State, DP-1.

The distribution of bedrooms per unit, shown in Table 11, indicates that the Township contained fewer small units (no or one bedroom) than the County or State and significantly more large units (four or more bedroom) than either the County or State in 2000. The State and County had similar patterns with two or three bedroom units being the most prevalent.

TABLE 11: Percentage of All Units by Number of Bedrooms

Jurisdiction	None or one	Two or Three	Four or More
Hopewell Township	3.8	51.7	44.5
Mercer County	17.3	57.6	25.1
New Jersey	18.3	59.2	22.6

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

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. In the first Two Rounds of COAH's fair share allocations (1987-1999), COAH used seven indicators to calculate indigenous need: age of dwelling; plumbing facilities; kitchen facilities; persons per room; heating fuel; sewer; and, water. In the Round Three rules, COAH has reduced this to three indicators, which in addition to age of unit (Pre-1940 units in Table 6), are the following, as described in COAH's rules.

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 12 compares the Township, County, and State for the above indicators of housing quality. The Township has less units with inadequate plumbing and kitchen facilities than the County and State.

TABLE 12: Housing Quality for Township, County, and State

Condition	----------%----------		
	Hopewell Township	Mercer County	New Jersey
Inadequate plumbing [1]	0	.4	.5
Inadequate kitchen [1]	.1	.3	.5

Notes: [1]*The universe for these factors is all housing units.*

Source: *2000 U.S. Census, SF-3 for Township, County, and State, QT-H8 and QT-H4.*

The last factors used to describe the municipal housing stock are the housing values and gross rents for residential units. With regard to values, the 2000 Census offers a summary of housing values, seen in Table 13, which indicate that 72% of all residential properties in the Township were valued at $200,000 or more.

TABLE 13: Value of Residential Units

Value	Number of Units	--------%--------
$0 – 50,000	60	1.3
$50,000 – 99,999	73	1.6
$100,000 – 149,999	227	4.9
$150,000 – 199,999	898	19.4
$200,000 – 299,999	1774	38.4
$300,000 – 499,999	1073	23.2
$500,000 – 999,999	476	10.3
$1,000,000 +	44	1

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

The data in Table 14 indicate that in 2000 virtually all housing units rented for more than $500/month, with the largest percentage, 51%, found between $500 and $999 per month, and 38% of the units renting for $1,000/ month or more.

TABLE 14: Gross Rents for Specified Renter-Occupied Housing Units[1]

Monthly Rent	Number of Units	--------%--------
Under $200	0	0
$200 – 299	0	0
$300 – 499	9	2.6
$500 – 749	99	28.9
$750 – 999	76	22.2
$1,000 – 1,499	76	22.2
$1,500 or more	54	15.7

Note: *Median gross rent for Hopewell Township is $833.*
Source: *2000 U.S. Census, SF-3 for Township, QT-H12.*

The data in Table 15 indicate that in 2000 there were 90 renter households earning less than $35,000 annually. At least 76 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. All 8 renter households that make between $10,000 and $19,999 annually were paying more than 35% for gross rent.

TABLE 15: Household Income in 1999 by Gross Rent as a Percentage of Household Income in 1999[1]

Income	Number of Households	Percentage of Household Income					
		0 – 19%	20 – 24%	25 – 29%	30 – 34%	35% +	Not computed
< $10,000	0	0	0	0	0	0	0
$10,000 – 19,999	8	0	0	0	0	8	0
$20,000 – 34,999	82	6	0	8	16	52	0
$35,000 +	253	135	72	8	0	9	29

Note: *[1]The universe for this Table is specified renter-occupied housing units.*
Source: *2000 U.S. Census, SF-3 for Township,QT-H13.*

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 16,105 residents, or 4,515 more residents than in 1990, representing a population increase of approximately 28%. The Township's 28% increase in the 1990's compares to a 7% increase in Mercer County and an 8% increase in New Jersey.

The age distribution of the Township's residents is shown in Table 16. The younger age classes (0-4, 5-19) were relatively evenly split between males and females, while males predominated in the 18-24, 25-44 and 45-64 classes, and females predominated in the 65+ classes. The disproportionate population figures for the 18-24 and 25-44 male categories represented, in large part, the all-male population at the Mercer County Corrections Center, which housed 847 persons in 2000.

TABLE 16: Population by Age and Sex

Age	Total Persons	Male	Female
0-4	1,076	553	523
5 – 19	3,499	1,797	1,702
20 – 34	2,201	1,244	957
35 – 54	5,903	2,960	2,943
55 – 69	2,162	1,085	1,077
70 +	1,264	569	695
Total	**16,105**	**8,208**	**7,897**

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

Table 17 compares the Township to the County and State for the same age categories. The principal differences among the Township, County, and State occur in the 20-34 and 35-54 age categories. The Township had a lower percentage of 20-34 year olds than the County or State, while the Township's 35-54 year old category was higher than the County and State. The Township also had a lower percentage of those over the age of 70. In the 5 to 19 age category, the school age category, the Township slightly exceeded the County and State.

TABLE 17: Comparison of Age Distribution for Township, County, and State (% of persons)

Age	Hopewell Township	Mercer County	New Jersey
0-4	6.7	6.3	6.7
5 – 19	21.8	21	20.4
20 – 34	13.7	21.1	19.9
35 – 54	36.6	30.6	30.9
55 – 69	13.4	11.9	12.4
70 +	7.8	9.3	9.7
Median	**100**	**100**	**100**

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

Table 18 provides the Census data on household size for the Township, while Table 19 compares household sizes in the Township to those in Mercer County and the State. The Township differed from the County and State in terms of the distribution of household sizes by having fewer households of one person and more households of 4 and 5 persons. The Township also had more households of two persons that the County or State.

TABLE 18: Persons in Household

Household Size	Number of Households
1 person	878
2 persons	1,960
3 persons	978
4 persons	1,105
5 persons	442
6 persons	103
7 or more persons	32

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

TABLE 19: Comparison of Persons in Household for Township, County, and State (% of households)

Household Size	Hopewell Township	Mercer County	State
1 person	16	25.6	24.5
2 persons	35.6	30.9	30.3
3 persons	17.8	17.2	17.3
4 persons	20.1	15.4	16
5 persons	8	6.9	7.5
6 persons	1.9	2.5	2.7
7 or more persons	.6	1.6	1.7
Persons per household	**2.77**	**2.62**	**2.68**

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

Table 20 presents a detailed breakdown of the Township's population by household type and relationship. There were 4,429 family households in the Township and 1,069 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 (80.6% for the Township, 68.6% for the County, and 70.3% for the State).

TABLE 20: Persons by Household Type and Relationship

	Total
In family Households:	
Householder	4,429
Spouse	3,983
Child	2,230
In Non-Family Households:	
Male householder:	431
Living alone	327
Not living alone	104
Female householder:	638
Living alone	551
Not living alone	87
In group quarters:	
Institutionalized:	
Correctional institution	847
Nursing homes	21
Mental hospitals	0
Juvenile institutions	0
Other institutions	0
Non-institutionalized	13

Source: 2000 U.S. Census, SF-3 for Township, QT-P11 and QT-P12.

Table 21 provides 1999 income data for the Township, County, and State. The Township's per capita and median incomes were higher than those of the State and the County. The definitions used for households and families in Table 21 are similar to those identified in the description of Table 20, so that the households figure in Table 21 includes families.

TABLE 21: 1999 Income for Township, County, and State

Jurisdiction	Per Capita Income	----------Median Income----------	
		Households	Families
Hopewell Township	43,947	93,640	101,579
Mercer County	27,914	56,613	68,494
New Jersey	27,006	55,146	65,370

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

Table 22 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 $9,039 for a one-person household to $29,140 for an eight-person family (three-person family is $14,255). According to the data in Table 22, the Township had proportionately has fewer persons and families qualifying for poverty status than the County or State. However, the percentages in Table 22 translate to 173 persons, but only 38 families, in poverty status. Thus, the non-family households had a much larger share of the population in poverty status.

TABLE 22: Poverty Status for Persons and Families for Township, County, and State (% with 1999 income below poverty)

Jurisdiction	Persons (%)	Families (%)
Hopewell Township	1.1	.9
Mercer County	8.6	5.9
New Jersey	8.5	6.3

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

The U.S. Census includes a vast array of additional demographic data that provide interesting insights into an area's population. For example, Table 23 provides a comparison of the percent of persons who moved into their homes between the years 1995-1998; this is a surrogate measure of the mobility/stability of a population. The data indicate that the percentage of year 2000 Township residents residing in the same house as in 1995 exceeded that of the County and State.

TABLE 23: Comparison of Place of Residence for Township, County, and State (1995-1998)

Jurisdiction	Percent living in same house in 1995-1998
Hopewell Township	32
Mercer County	27
New Jersey	28

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

Table 24 compares the educational attainment for Township, County, and State residents. These data indicate that Township residents exceeded State and County residents in educational attainment. It is interesting to note that among the State's 21 Counties, Mercer County is sixth in the State in college graduates.

TABLE 24: 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
Hopewell Township	93	55.8
Mercer County	81.9	34
New Jersey	82.2	29.8

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

The 2000 Census also provides data on the means of transportation which people use to reach their place of work. Table 25 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 6.8% of workers who resided in the Township and used other means of transportation to reach work, 87% (or 438 workers) worked at home and 4% (or 24 workers) walked to work.

TABLE 25: 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
Hopewell Township	83.3	5.5	4.4	6.8
Mercer County	73.3	11	6.9	8.8
New Jersey	73	10.6	9.6	6.7

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

Projection of Municipal Housing Stock

As part of the mandatory contents of a housing element, the township is required to produce "a projection of the municipality's housing stock, including the probable future construction of low and moderate income housing, for the next six years, taking into account, but not necessarily limited to, construction permits issued, approvals of applications for development and probable residential development of lands." (N.J.S.A. 52:27D-310b.)

DVRPC Population Forecast for 2015

In order to forecast a 2015 population for the Township, it is necessary to consider past history, current zoning, and some expectation as to what might happen in the future; the last element obviously is the most problematic.

The DVRPC, which is the Metropolitan Planning Organization (MPO) for Mercer County, also provided draft population forecasts through the year 2030. The Township analysis of these forecasts, as reflected in the January 31, 2005 letter to the County and detailed below, has been accepted by Mercer County and the DVRPC has accepted the revision.

The following table identifies the number of housing units that were authorized by building permits over the last 30 years.

TABLE 26: History of Building Permit Issuance for Last 30 Years

Decade	Total residential units authorized by building permits	Annual range (units)- Low and high years	Average year (units)
1970 to 1979	590	28 (1975) to 97 (1973)	59
1980 to 1989	525	14 (1981) to 108 (1987)	52.5
1990 to 1999	1,794 *	24 (1991) to 442 (1993)	179.4

* This figure includes 1,293 building permits issued for the various projects at Brandon Farms.

If Brandon Farms is excluded from the above data, which is legitimate since the development resulted from the Township's past affordable housing obligation, the number of building permits issued for the 1990-1999 period is reduced to 501 building permits. Thus, the three decades show a fairly consistent development pattern of 501 to 590 units every ten years, or an average of 539 residential units every ten years. The lowest ten-year period was 1975-1984, when 370 residential units were authorized by building permits. During the ten-year period from 1983-1992, which included both boom and bust times, there were 552 residential units authorized by building permits, which closely approximates the average decade over the last three decades.

We also note that since this time period the Township has gone through a rezoning that has reduced the development potential substantially. Many of the units noted above were developed

under the two-acre zoning that prevailed in the R-200 District, which no longer exists. Given the zoning changes, we can anticipate a slower rate of growth. If the growth period of 1975-1984 prevails in the future, as might be expected considering the rezoning, we would anticipate a total of 370 units for single-family residential growth in the 2005-2015 period, excluding the ongoing construction of a townhouse development and an age-restricted development, which include 116 and 46 units, respectively. Adding those units to the forecast population growth produces the following:

TABLE 27: Forecast Dwelling Unit Growth from 2005-2015

Type of Unit	Number of Units
Single-family detached	370
Townhouse	116
Age-restricted	46
Total	532

This forecast is consistent with the history of building permit issuance in the Township, current approvals and current zoning.

Municipal Employment and Projections

As part of the mandatory contents of a housing element, the Township is to provide "an analysis of the existing and probable future employment characteristics of the community." (N.J.S.A. 52:27D-310d) In COAH's First Round (1987-1993), COAH used employment data, in terms of how many people worked within a municipal border, as an allocation factor for its affordable housing need allocations. In the Second Round (1993-1999) COAH changed this allocation factor to the value of non-residential ratables. Now in the proposed Third Round rules COAH is using the growth in non-residential jobs as a component of the growth share formula for the determination of a municipality's affordable housing obligation.

DVRPC Employment Estimate and Projections

The DVRPC also estimates and projects employment from the years 2000 to 2030. These figures are depicted below (the figure for the year 2000 is an estimate, the other years are projections):

TABLE 28: DVRPC Employment Estimate and Projections

Year	Employment
2000	8,025
2005	9,475
2010	12,125
2015	12,593
2020	13,403
2025	14,339
2030	14,893

These figures were examined relative to known employment in the Township, and the DVRPC employment in 2005 appears accurate. While an independent projection has not been prepared for the year 2015, the DVRPC numbers are reasonable. As to the DVRPC projection for 2030, again an independent projection has not been prepared, but it appears that this number is likely to underestimate the employment as of that date, given the extended approvals that have been granted to the Township's 4 major office/research employers. Thus, Mercer County notified the DVRPC that the employment projections are acceptable.